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Appendix A: Supplementary information

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

July 2021

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1.Introduction

Purpose

This document provides information on the Congestion Charge scheme, the proposed changes to the scheme including why we are proposing them and how they have been developed, the expected traffic impacts of the proposals as well as the potential wider impacts as identified in the Integrated Impact Assessment.

Overview of proposed changes

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

Since its introduction, there have been a number of changes to the scheme, including the level of daily charge and penalty charge for non-payment, the charging zone, the operating days and hours, payment methods and discounts and exemptions to the charge. The recent temporary changes to the scheme are set out in Section 2.

The current Mayor's Transport Strategy¹ (MTS) contains proposal 20, which states:

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

Prior to 22 June 2020, the main Congestion Charge operating conditions were:

- £11.50 charge level for each charging day on which a vehicle enters the Congestion Charge zone (CCZ)
- £1 discount if using Auto Pay or Fleet Auto Pay
- £14 pay next day charge (if paid by one day after travel in the CCZ, to avoid a penalty charge notice (PCN))
- The charging hours were Monday to Friday 07:00 – 18:00, no charge at weekends
- No charging on Bank Holidays or the days between Christmas Day and New Year's Day
- 90 per cent residents' discount for eligible residents
- NHS staff and patient reimbursement schemes

The full details of the Congestion Charge before the pandemic were set out in the consolidated Charging Scheme order dated May 2019².

¹ Mayor's Transport Strategy, 2018 (www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf)

² The consolidated Charging Scheme order dated May 2019 can be found here: www.tfl.gov.uk/cdn/static/cms/documents/consolidated-scheme-order-may2019.pdf

In response to the emergency situation arising from the COVID-19 pandemic and in accordance with the Government's request for TfL to urgently bring forward proposals to widen the scope and levels of road user charging schemes, temporary changes were introduced to the Congestion Charge on 22 June 2020 and remain in place. These temporary changes were intended to support the Mayor's Streetspace plan and facilitate the flow of essential traffic (including for key workers) in central London during the pandemic. The temporary changes are:

- £15 charge level for each charging day on which a vehicle enters or is kept in the CCZ
- No Auto Pay or Fleet Auto Pay discount
- £17.50 charge level to pay after the day of travel and deadline for payment extended to three days after travel
- The charging hours are Monday to Sunday 07:00 – 22:00 except Christmas Day
- The 90 per cent residents' discount was closed to new applicants from 1 August 2020 (residents registered for the discount by this date continued to receive a 90 per cent discount)
- NHS staff and patient reimbursement schemes were expanded to encompass more staff journeys and all patients most at risk from the coronavirus
- New reimbursement arrangements were introduced for:
 - workers working at care homes located in the CCZ;
 - workers and volunteers providing services on behalf of a local authority or charity in direct response to the pandemic or which supports the most vulnerable people.

[The full details of the Congestion Charge as it applied as from 22 June 2020 are set out in the consolidated Charging Scheme order dated July 2020³.]

TfL and the Mayor keep the Congestion Charge under review to ensure its continued effectiveness, as per the MTS.

We are now consulting on new proposed changes to the Congestion Charge which we consider will enable us to continue to achieve MTS objectives and ensure the Congestion Charge continues to be effective in reducing traffic and congestion in central London.

The proposals are:

- £15 charge level for each charging day on which a vehicle enters the CCZ
- No Auto Pay or Fleet Auto Pay discount
- £17.50 charge level to pay after the day of travel and deadline for payment extended to three days after travel
- The charging hours will be Monday to Friday 07:00 – 18:00 and Saturdays, Sundays and Bank Holidays 12:00 – 18:00
- No charge from Christmas Day to New Year's Day bank holiday (inclusive)
- 90 per cent residents' discount, re-opened to new applicants
- Reimbursement arrangements for NHS patients who are vulnerable to risk of infection, care home workers working at care homes in the CCZ, local authority or

³ The consolidated Charging Scheme order dated July 2020 can be found here:
www.tfl.gov.uk/cdn/static/cms/documents/consolidated-scheme-order-july-2020.pdf

charity workers and volunteers providing certain services in relation to the COVID-19 pandemic are proposed to 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 is also proposed to continue.

A summary comparison of the pre-pandemic scheme, temporary changes and new proposals can be seen in the below table.

	Pre-pandemic scheme up to 22 June 2020	Temporary changes to the Congestion Charge from 22 June 2020	Proposed changes to / provisions in the Congestion Charge
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	Mon – Fri, 07:00 – 18:00	Mon – Sun, 07:00 – 22:00	Mon – Fri, 07:00 – 18:00; Sat, Sun & bank holidays, 12:00 – 18:00
Non- charging days	Bank holidays and the days between Christmas Day and New Year's Day	Christmas Day	Christmas Day to New Year's Day bank holiday (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, and new reimbursement arrangements for care home workers working at care homes in the Congestion Charging Zone and charities and local authorities' workers/volunteers providing certain services.	<p>Extended NHS staff reimbursement arrangement.</p> <p>NHS patient reimbursement arrangement expanded to patients vulnerable to risk of infection during any future pandemic or epidemic prevalent in Greater London (this includes the COVID-19 pandemic).</p> <p>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 future pandemic or epidemic prevalent in Greater London.</p>
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Table 1: Comparison of pre-pandemic Congestion Charge, temporary changes and new proposals for consultation

Each of the proposals is discussed in detail in section five. In addition to the proposals described above, we are also proposing to make an administrative change to how residents pay for multiple consecutive charging days.

Subject to the consultation and if confirmed by the Mayor, the proposed changes would come into immediate effect the day after a decision is made for them to be implemented, expected to be later this year. The exception would be the introduction of new charging days and hours, which involve changes to signage and technology systems. The changes to days and hours would come into effect on 28 February 2022.

2.The Congestion Charge

History of the scheme

A Congestion Charge was first introduced in central London on 17 February 2003. The current boundary of the Congestion Charge zone (CCZ) is shown in Figure 1. The scheme reduces traffic and congestion in central London by reducing the number of vehicles that enter the CCZ during charging hours. This secures further benefits identified below.

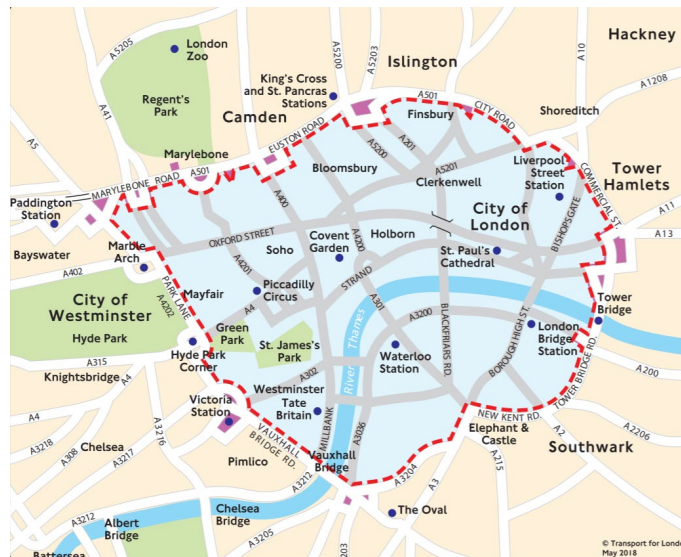


Figure 1: The Congestion Charge zone

The scheme requires that a charge must be paid for each day on which a vehicle that is kept or used in the CCZ during the charging hours.

The Congestion Charge has a number of discounts and exemptions, which are set out below. Generally, customers have to register for a discount and provide proof of eligibility. Exemptions, however, are usually automatically applied.

Discounts (100% except residents' discount)
Residents' discount (90%)
Blue Badge holders
Accredited breakdown vehicles
Vehicles with 9+ seats
Cleaner Vehicle Discount for electric and certain plug-in hybrid vehicles
Motor tricycles

Roadside recovery vehicles

Table 2: Discounts to the Congestion Charge

Exemptions
Two-wheeled motorcycles and mopeds
Emergency service vehicles (police, ambulance, lifeboat and fire service vehicles exempt from Vehicle Excise Duty)
NHS vehicles that are exempt from vehicle tax
Vehicles used by disabled people that are exempt from vehicle tax
Vehicles for more than one disabled person that are exempt from vehicle tax
Designated wheelchair accessible PHVs licensed with TfL (when fulfilling a booking)
Taxis licensed by TfL
HM Coastguard and Port Authorities vehicles
Certain borough and TfL operational vehicles
Armed forces vehicles
Royal Parks Agency and Crown Estate Paving Commission vehicles

Table 3: Exemptions to the Congestion Charge

There are also reimbursement arrangements for NHS staff and patients, care home workers and certain charity and local authority workers or volunteers. More information on these rules can be found here: <https://tfl.gov.uk/modes/driving/reimbursements-of-the-congestion-charge-and-ulez-charge>. The full details of the existing exemptions as from 22 June 2020 are set out in the consolidated Charging Scheme order dated July 2020⁴.

Initial impacts

Following its introduction, the Congestion Charge was very effective in reducing traffic and congestion in the CCZ. There was a 30 per cent reduction in congestion within the CCZ, and a 15 per cent reduction in circulating traffic. In addition, by reducing the overall volumes of traffic within the CCZ and increasing the efficiency of circulating traffic, the

⁴ The consolidated Charging Scheme order dated July 2020 can be found here: www.tfl.gov.uk/cdn/static/cms/documents/consolidated-scheme-order-july-2020.pdf

Congestion Charge was responsible for a reduction in emissions. This equated to approximately a 12 per cent emissions reduction of both NO_x and PM₁₀ from road traffic and 20 per cent reduction in emission of CO₂ from road traffic, based on a 24-hour annual average day.

Congestion Charge in recent years

The MTS highlighted that 15 years after the introduction of the Congestion Charge, while it remained an integral part of managing road space, the challenge facing central London had changed. It emphasised the changing composition of vehicles in the CCZ and the times in which they entered.

One of the elements discussed was the growth in uncharged vehicles in the CCZ, in particular the rise in the number of private hire vehicles (PHVs). It stated that the number of PHVs entering the CCZ had grown from the 4,000 predicted in 2003 to more than 18,000 daily.

In April 2019, the PHV exemption was removed, except for those designated as wheelchair accessible, following public consultation. This had the effect of reducing the number of unique PHVs entering the CCZ in line with expectations when compared to before the exemption was removed.

The MTS also set out that weekend traffic levels in the CCZ had become similar to levels on weekdays. The graphs below, taken from the MTS, showed traffic levels in the CCZ on weekdays and at the weekend (Saturday and Sunday average) by half hour period. This demonstrated the high levels of traffic at the weekend in comparison to weekday traffic levels.

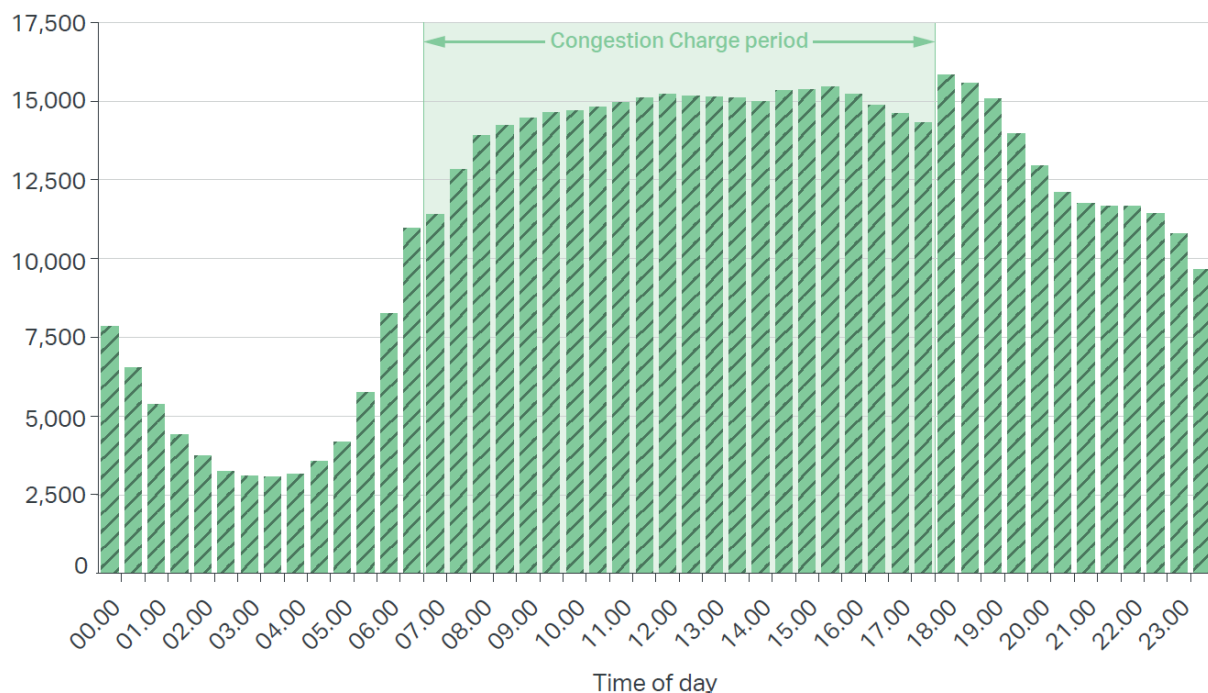


Figure 2: Traffic levels in CCZ by half hour, Monday to Friday average (Source: Mayor's Transport Strategy, 2018)

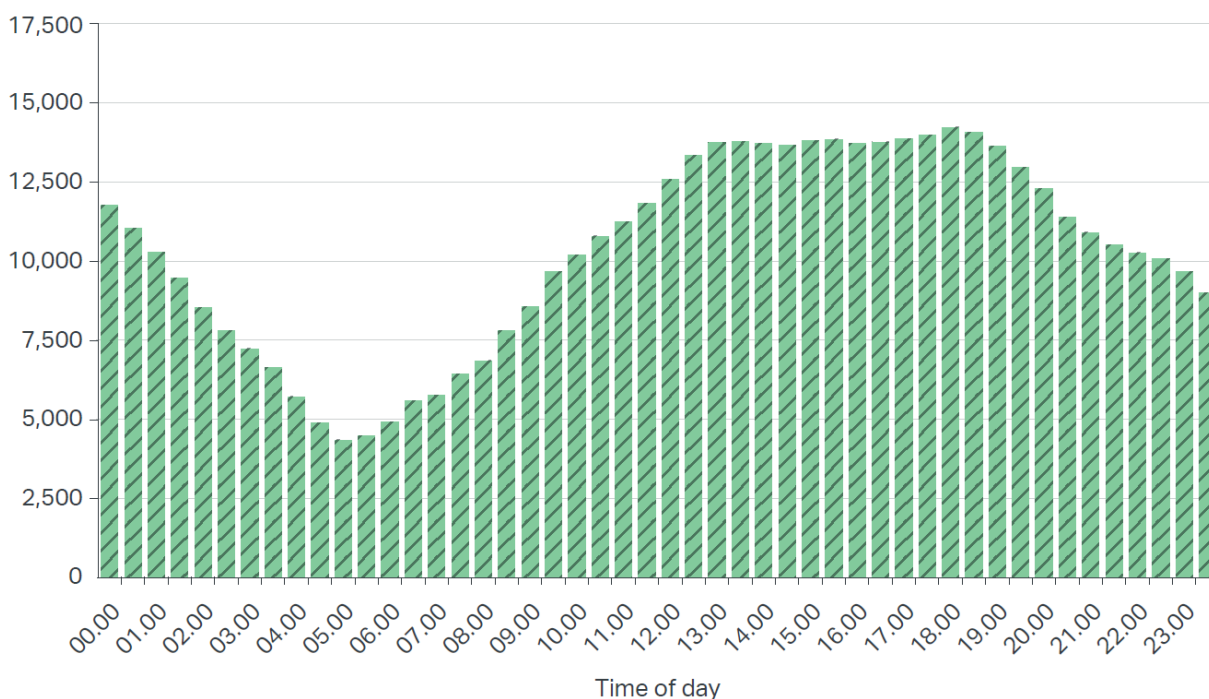


Figure 3: Traffic levels in the CCZ by half hour, Saturday and Sunday average (Source: Mayor's Transport Strategy, 2018)

Temporary changes to the Congestion Charge

To address the transport challenges arising from the COVID-19 pandemic, a package of temporary changes to the Congestion Charge came into effect on 22 June 2020. The temporary changes were introduced following a funding package being agreed with the Department for Transport, with one aspect being to urgently bring forward proposals to widen the scope and levels of road user charging schemes. These changes are intended to support the enhanced provision of space for walking and cycling as implemented by the Mayor's Streetspace plan and facilitate the free 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.

Following the Government's announcement of the progression to Step 4 of the 'Roadmap out of lockdown' on 19 July 2021, we reviewed the transport challenges arising from the pandemic and identified that the following are likely to persist beyond Step 4:

- a slow return of users to public transport and a general reluctance for people to currently return to using it as they did pre-pandemic;
- temporary road space changes to roads in the CCZ reducing capacity for motorised traffic, with no immediate plans to return to the pre-pandemic situation; and
- the return of traffic at a faster rate than public transport use, bringing with it the potential risk of a car-based recovery, with its associated impacts on health, the environment and road danger, as well as and the inability of central London's limited road capacity to cope.

The temporary changes to the Congestion Charge scheme remain a necessary response to these persistent challenges. They will remain in place and will continue to be kept under review. If the temporary changes are still in place at the time of the proposed implementation of any proposed changes or provisions (as per this consultation), the intention is that they will be replaced by these proposals.

3. The case for new proposals

The Mayor's Transport Strategy (MTS)

The Mayor's Transport Strategy (MTS) sets out the healthy streets approach, which puts people at the centre of transport planning. The MTS recognises that the success of London's transport system relies on reducing Londoners' dependency on cars in favour of increased walking, cycling and public transport use. As such, the central aim of the MTS is for 80 per cent of all trips in London to be made on foot, cycle or public transport by 2041.

An increase in the number of journeys being made by people walking, cycling and using public transport, and a reduction in car use across London, will not only deliver the vision and central aim of the MTS, but will also help address poor air quality and the climate emergency, deliver the Mayor's ambition for Vision Zero and provide vibrant, attractive and inclusive public spaces. In addition, a shift from car use to more space-efficient means of travel also provides the only long-term solution to the congestion challenges that, as outlined in the MTS, threaten London's status as an efficient, well-functioning city.

Reliable deliveries and servicing, high-quality public services and easy access to workplaces and cultural and leisure attractions are all dependent on the development of an increasingly efficient transport network. Reducing car dependency and increasing the share of sustainable modes of transport (sustainable mode share) is a critical component to keeping London moving.

Sustainable mode share

Delivering the mode share aim of the MTS requires that London's public transport provides a reliable and practical alternative to car use, and that people feel safe and confident to walk and cycle. Achieving this requires that the negative impacts of traffic and congestion caused by motorised vehicles are reduced.

Prior to the pandemic, across Greater London, we were making steady progress towards the MTS aim for 80 per cent sustainable mode share. In 2019, 63.2 per cent of all trips were made by sustainable modes. The latest mode share estimates are for Q3 2020, which found sustainable mode share had reduced to 54.9 per cent as a result of the significant change in travel behaviour due to the pandemic. Although trips by public transport have decreased, there has been an increase in walking and cycling, though there continues to be a significant risk of increasing car travel.

The 80 per cent mode share aim is a London wide ambition. For trips being made within, to and from central London, the expected mode share in 2041 is:

Travel between central area and	MTS 2041 expected walk/cycle/bus mode share
Central	95%
Inner	99%
Outer	99%

Table 4: Mode share (expected) in 2041 (Source: Mayor's Transport Strategy, 2018)

The central London 2041 mode share ambitions in Table 4 reflect the already higher sustainable mode share of these trips and the very high levels of public transport connectivity. Prior to the pandemic, a 90 per cent sustainable mode share for trips made by London residents within central London had been achieved, with almost all remaining car trips potentially switchable to sustainable modes.

Despite this high sustainable mode share, congestion was still evident within the CCZ especially outside charging hours. High levels of traffic and congestion in the CCZ add delay to journey times for businesses and individuals, reduce the reliability of buses, worsen air pollution and make streets less safe for those walking and cycling. Reducing traffic improves conditions for those sustainable modes, which is required to meet MTS objectives.

Efficient movement in central London

A shift from car use to sustainable modes also makes more efficient use of London's streets. Compared to buses and people walking and cycling, cars take up considerably more road space per person. The MTS sets a clear total traffic reduction target of 10-15 per cent by 2041 to tackle congestion and improve the efficiency of streets for the movement of people and goods.

The tightly constrained road network in central London means efficient movement is fundamental to the continued success of such a limited geographical area. Reducing car use provides economic benefits by freeing up space and reducing journey times for essential trips that keep London's businesses and key services functioning.

Around 50 temporary or experimental street space schemes have been implemented by TfL and the boroughs in central London since May 2020. These include schemes to increase footway space, timed road closures and cycleways. All schemes focus on reallocating road space from general traffic to support the increased levels of travel by sustainable modes in central London.

These measures supported increased levels of sustainable travel during the pandemic (due to social distancing, reduced public transport capacity and Government advice) and are likely to remain in place beyond Step 4 of the Government's roadmap out of lockdown. These temporary measures may be considered for permanency, subject to consultation, engagement and assessment of their impacts.

In developing new proposals for the Congestion Charge, we have considered the pre-pandemic situation with regards to traffic and congestion with the road network capacity

available at that time, as well as the existing capacity of the road network given there are number of temporary and experimental schemes in place and it is possible that some or all may remain in place (but this is uncertain).

The Congestion Charge plays an important role in helping to manage traffic and congestion. The MTS highlighted that the scheme may need to be reviewed in light of increased traffic before the temporary Streetspace changes were introduced. If any Streetspace schemes in central London are made permanent in the future after due process is followed, the case for reducing traffic levels would be even stronger.

4. Development of proposals

Prior to the pandemic, the MTS highlighted the traffic challenge in central London with high levels of traffic outside charging hours.

Section 2 outlined previous changes to the Congestion Charge scheme as a result of ongoing review of the traffic conditions and relevant external factors in central London.

Looking forward, it is clear that some of the transport challenges that have arisen as a result of the pandemic may be longer-term features of the transport landscape in central London.

New proposals have been developed to ensure the Congestion Charge scheme remains effective in managing traffic and congestion in central London in support of long term MTS objectives as well as effectively addressing persistent transport challenges arising from the pandemic.

Transport scenarios and forecasts

We have undertaken a scenario planning exercise to help inform future decision making, given the need to understand the impact of the pandemic on the economy and travel demand in the future. We have developed five post-pandemic scenarios to account for the increased uncertainty. To allow for detailed assessment, we have also created two fully modelled forecasts which combine assumptions from the five scenarios. This includes a Reference Case - which assumes a close return to pre-pandemic travel behaviours and updated economic forecasts - and the Hybrid forecast - which assumes slightly slower population growth, more working from home and online shopping and a slower recovery in public transport usage.

In both the current Reference Case and Hybrid forecast, traffic levels in central London could increase, as shown in Figure 4. In the Hybrid forecast - in part due to the impact from the slower recovery in public transport usage - we could effectively lose the last 10 to 15 years of traffic reduction without intervention. Further information can be found in the Integrated Impact Assessment (IIA), within the Consultation Materials.

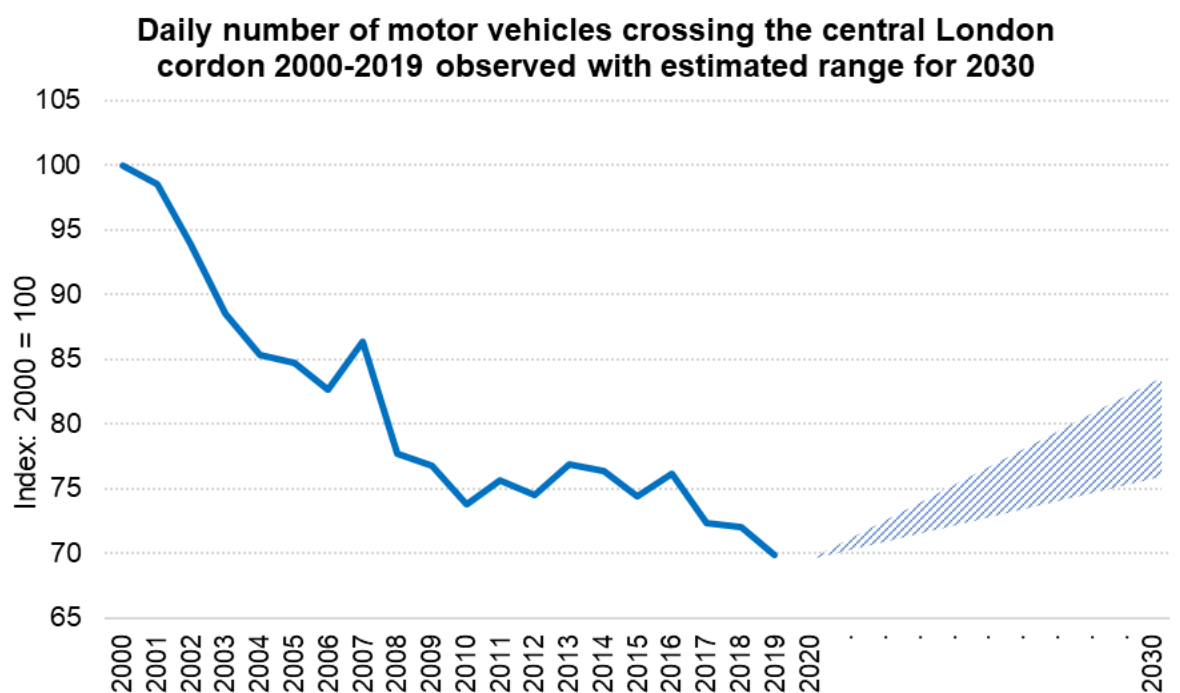


Figure 4: Daily number of motor vehicles crossing the central London cordon 2000-2019 with 2030 estimate (Source: TfL modelling)

In November 2020, the GLA commissioned Arup to produce a report on the future of the Central Activities Zone. The 'Central Activities Zone (CAZ) Economic Futures Research' report was published in March 2021⁵ and recommends an ambitious step change in creating inclusive and accessible public realm with increased space for pedestrians and active travel. Complementing this, the report says, is: the need to remove vehicles from some areas of the CAZ to create large 'car free' areas; and a review of the congestion charge to prevent a car led recovery and ensure traffic levels are kept low.

Option development

We have assessed several potential changes to the Congestion Charge for their effectiveness in achieving its primary objective of traffic and congestion reduction in support of the policies and proposals of the MTS.

A summary of options considered including why they were or were not taken forward to consultation is included in the below table.

Parameter	Option	Taken forward / Rejected	Justification
Charging level	Increase charge to £13	Rejected	<ul style="list-style-type: none"> Modelling analysis indicates that the charge would have a lesser impact on traffic in the CCZ,

⁵ <https://www.london.gov.uk/business-and-economy-publications/central-activities-zone-caz-economic-futures-research>.

			reducing car kms in the CCZ in pre-pandemic charging hours by around 1.5%
	Increase charge to £15	Taken forward	<ul style="list-style-type: none"> Modelling indicates a £15 charge would be expected to reduce car kms in the CCZ in pre-pandemic charging hours by around 4%
Weekday Charging hours	Extend charging hours in the evening	Rejected	<ul style="list-style-type: none"> Not being taken forward while future weekday travel patterns remain uncertain and due to potential impacts on the recovery of the evening economy
	End charging at 6pm	Taken forward	<ul style="list-style-type: none"> In combination with a £15 charge level, there is a traffic reduction in pre-pandemic charging hours. The profile of traffic in the evening will be kept under review
Weekend charging hours	Charging hours 12 noon – 6pm	Taken forward	<ul style="list-style-type: none"> Traffic levels at weekends are similar to weekdays, with car and PHV traffic even higher than on an average weekday, pre-pandemic, causing delay to essential traffic including buses and freight. Highest levels of traffic seen on weekends from midday. In combination with a £15 charge, there is a reduction in car traffic of around 15%.
	Extend charging hours beyond 12 noon – 6pm	Rejected	<ul style="list-style-type: none"> Although entries to the zone have been higher on Saturday and Sunday compared to an average weekday, overall traffic levels are lower on weekend mornings. Longer charging hours at the weekend, given the different activity profile compared to weekdays, may adversely impact some individuals.
Charging days	Charge weekends	Taken forward	<ul style="list-style-type: none"> Traffic levels at weekends are similar to weekdays, with car and PHV traffic having been even higher than on an average weekday, pre-pandemic Extends the benefits of reduced traffic and congestion (including freeing up road space for sustainable modes and essential traffic, as well as emissions reductions) to weekends, when

			more people are travelling for leisure
	Charge bank holidays	Taken forward	<ul style="list-style-type: none"> Car and PHV traffic were higher on bank holidays than on an average weekday pre-pandemic Extends the benefits of reduced traffic and congestion to bank holidays when there are likely to be higher proportions of visitors and leisure trips
	Charge-free weekends	Rejected	<ul style="list-style-type: none"> Traffic levels at weekends are very similar to weekdays, with car and PHV traffic even higher than on an average weekday pre-pandemic, causing delay to essential traffic including buses and freight
	Charge-free period from Christmas Day to New Year's Day Bank Holiday inclusive	Taken forward	<ul style="list-style-type: none"> Fewer alternative travel options on Christmas day Changes to travel patterns throughout period, for example through the closure of some businesses throughout the period, reducing traffic and the impact of journeys for those who are travelling on those days
Discounts, charges and exemptions	Maintain residents 90% discount	Taken forward	<ul style="list-style-type: none"> Residents receive a 90% discount in recognition of the fact they are unable to avoid the charge if they need to drive Removing the discount would have greater impacts for residents whose opportunity to avoid the charge would be even more constrained by the proposed higher charge level and introduction of weekend charging
	Remove residents' discount	Rejected	<ul style="list-style-type: none"> At this time, it remains appropriate to provide a reduced level of charge for residents who may have less option to avoid the charge
	Reduce residents' discount	Rejected	<ul style="list-style-type: none"> The higher charge level and extension of charging hours to weekends may further influence some residents' mode choice. The impact of the new proposals, if confirmed, on residents' car trips would be kept under review
	Longer-time period to pay	Taken forward	<ul style="list-style-type: none"> To provide drivers with more time to pay the charge (at a higher rate

	'next day' following travel into the CCZ		than the ordinary charging level) before being issued with a PCN
	Increase charge level for 'next day' payment to £17.50	Taken forward	<ul style="list-style-type: none"> • Increase to charge required to continue incentive to pay in advance of travel into the CCZ. The £2.50 price differential between the ordinary charging level and deferred charge is retained
	Remove Auto Pay and Fleet Auto Pay discount	Taken forward	<ul style="list-style-type: none"> • The rationale for introducing Auto Pay discounts was to encourage people to switch to paying by account. As the majority of people now pay by Auto Pay, this incentive is no longer required • Removing the discount reinforces that access to road space in central London should not be discounted for those who are liable to pay the full charge • An incentive remains to continue using Auto Pay as it reduces the risk of having to pay a higher charge in the days following travel in the zone or incurring a PCN for non-payment
	Introduce wider reimbursements or make changes to existing reimbursement schemes	Taken forward	<ul style="list-style-type: none"> • The extension of the NHS staff reimbursement is proposed to be retained • The other reimbursement arrangements introduced as part of the temporary changes will be retained and extended to ensure they can be used in future pandemic and epidemics in Greater London, recognising the positive impacts this has had for those in response roles and vulnerable people they support

5. The proposals and their impact on traffic and congestion

The new Congestion Charge proposals have been developed to support the long term aims of the MTS whilst also helping to address short to medium term transport challenges. The Congestion Charge is one of the key tools to manage road space and demand in central London but relies upon continual review to ensure its ongoing effectiveness in changing circumstances.

£15 charge level

Background and context

The charge level was previously increased in 2014, when it increased from £10 to £11.50. Previous changes included an increase in 2011 from £8 to £10 and an increase in 2005 from £5 to £8. The period since 2014 is the longest time in which a permanent increase to the charge level has not been made, gradually eroding the deterrent effect of the charge.

In June 2020, the charge level was temporarily increased to £15 as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed?

We are proposing to set the charge level at £15 to help reduce traffic and congestion in central London and support the other aims of the MTS. The increase in charge level reflects the high value of road space in central London and has been assessed and forecast to have a positive impact on (that is, to reduce) traffic in the CCZ. Road space in central London is tightly constrained and as far as possible, motorised traffic should be disincentivised from entering the CCZ.

High levels of motorised traffic in such a small area have significant negative impacts on those who work, visit and live in central London, increasing costs for businesses, slowing down essential journeys and negatively impacting air quality.

Impact of the proposal

A £15 charge level is expected to reduce car kms in the CCZ by around four per cent between 07:00 – 18:00 on weekdays, compared to a situation where no changes were made to the pre-pandemic scheme. 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 into each weekday.

Monday to Friday charging hours 07:00-18:00

Background and context

Prior to the pandemic, the Congestion Charge operated on weekdays from 07:00 – 18:00.

The hours of operation were temporarily extended in June 2020 to 07:00 – 22:00 on weekdays and weekends as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed

We are proposing that the Congestion Charge will operate on weekdays from 07:00 – 18:00, the same weekday charging hours as the pre-pandemic scheme.

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. When determining the right time to end the Congestion Charge operating hours on weekdays, we have considered the changing and uncertain nature of weekday travel patterns, the impact on the evening economy in central London and on those who need to carry large or heavy loads to participate in it or drive in for shift work.

It is also recognised that there may be cumulative impacts of the proposed package of changes which could impact overall weekday traffic and congestion levels. A higher charge level during the week (and removal of the Auto Pay discount) will result in some mode shift. Charging at weekends will also influence mode choice for a new cohort of drivers, which could extend benefits to journeys made on other days.

If the proposed new weekday charging hours are implemented, they will be kept under review to understand their impact on evening traffic.

Impact of proposal

This proposal is not expected to impact traffic and congestion as compared to the pre-pandemic scheme. However, wider changes to the Congestion Charge, weekday travel patterns and the road network in central London could lead to changes in behaviour which could have knock-on impacts for traffic levels in the CCZ in the evenings.

Saturday and Sunday charging hours from 12:00 – 18:00

Background and context

Prior to the pandemic, car (including PHV) traffic was higher on Saturdays and Sundays than on an average weekday. Car and PHV traffic also made up over 70 per cent of traffic in the CCZ at the weekend, compared to 50 per cent in the week.

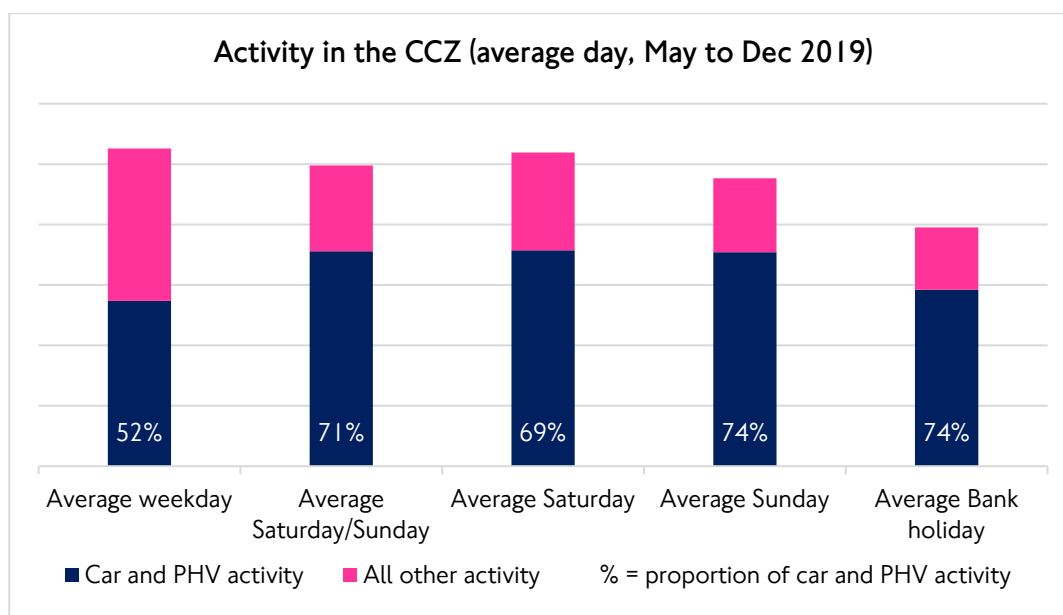


Figure 5: Activity in CCZ comparing average weekday, average weekend and average bank holiday

As highlighted in the MTS, the challenge facing central London has changed. With higher levels of car and PHV traffic seen at the weekend, the pre-pandemic charging days did not reflect the days of the week with the highest number of entries to the CCZ. It is necessary to take steps to help reduce levels of traffic and congestion seen at the weekend to ensure we meet the aims of the MTS, with the proposed charging hours reflecting this.

High traffic levels at the weekends contribute to congestion and delay, including for bus passengers, as well as a less pleasant street environment, higher levels of emissions and increased road danger.

Charging on Saturday and Sunday from 07:00 – 22:00 was temporarily introduced in June 2020 as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed?

We are proposing that weekend charging hours will be from 12:00 – 18:00 on Saturdays and Sundays, when traffic is at its highest.

Although entries to the CCZ have been higher on Saturday and Sunday compared to an average weekday, overall traffic levels are lower on weekend mornings. Given the different activity profile at the weekends compared to weekdays, we are proposing shorter hours at the weekend which will help to mitigate the impact on some individuals.

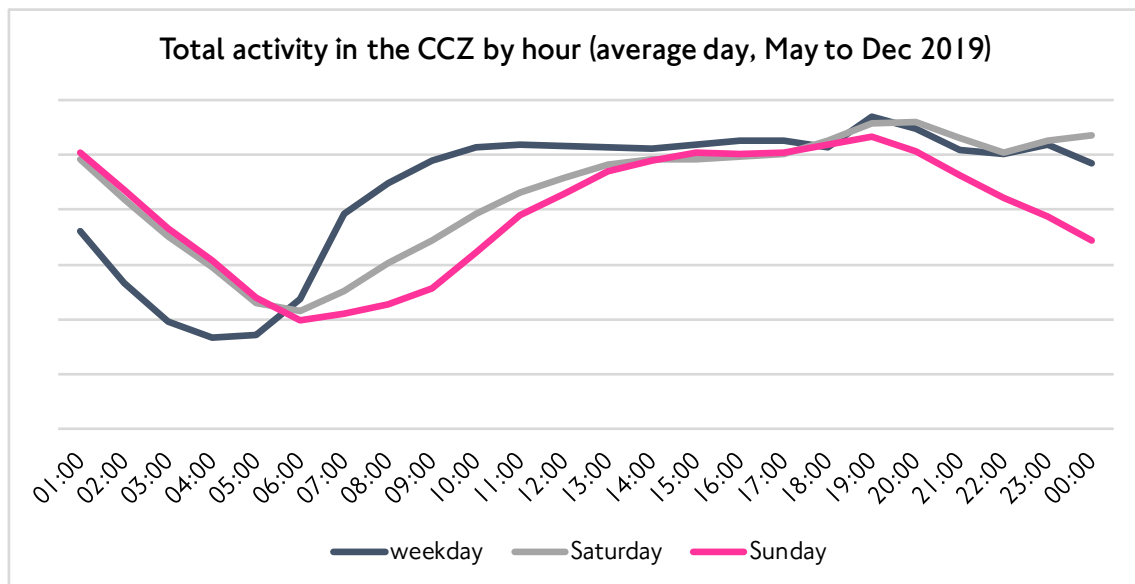


Figure 6: Total activity by hour on Saturdays, Sundays and average weekday in CCZ

Shorter hours of operation at the weekend could help to support freight trips that have a positive impact on London's weekend economy. Starting the hours later also accounts for later availability of public transport on the weekend.

Impact of the proposal

A £15 charge between 12:00 and 18:00 on Saturdays and Sundays is expected to reduce car kms in newly charged hours by around 15 per cent compared to a situation where no changes were made to the pre-pandemic scheme. As a result, sustainable travel to the CCZ is expected to increase. It is estimated that there will be around 8,000 new public transport trips and 3,000 walking and cycling trips each day on the weekend.

Bank Holiday charging hours from 12:00 – 18:00

Background and context

Prior to the pandemic, car and PHV traffic was higher on Bank Holidays than on an average weekday.

All days except Christmas Day were charged as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed?

We are proposing to introduce Bank Holiday charging hours from 12:00 – 18:00. This will help to encourage the use of sustainable modes of travel and reinforce that central London road space is tightly constrained across all days. Charging the majority of Bank Holidays also means that for most of the year the Congestion Charge will operate seven days a week.

Impact of the proposal

The impact of the proposal is likely to be similar to that expected at the weekends, with around 15 per cent reduction in car kms in the newly charged hours with a £15 charge.

No charge between Christmas Day and New Year's Day bank holiday (inclusive)

Background and context

Prior to the pandemic, the Congestion Charge operated Monday to Friday excluding Bank Holidays and the period between Christmas Day and New Year's Day.

The days of operation were extended to include every day except Christmas Day as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed?

We are proposing that the period in between Christmas and the New Year's Day bank holiday inclusive (including where this falls later than 1 January due to New Year's Day falling on a weekend) will not be charged.

Traffic levels are normally around 20 per cent lower during this week. 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.

Impact of the proposal

There is not expected to be a traffic impact from this proposal compared to the pre-pandemic scheme, as those days were not previously charged.

90 per cent residents' discount, open to new and existing residents

Background and context

In 2003, when the scheme was introduced, a 90 per cent residents' discount was provided in recognition that residents are unable to avoid the charge if they need to drive.

The residents' discount was closed to new applicants from 1 August 2020 as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed?

In light of additional charging hours at weekends, there are fewer opportunities than previously for residents to avoid the charge. We are proposing to maintain the 90 per cent residents' discount and to re-open applications for all eligible residents to register for the discount.

Impact of the proposal

There is not expected to be a noticeable traffic impact from this proposal as compared to the pre-pandemic scheme, as this re-opens applications for the residents' discount that was in place previously (and which continued for registered residents). There may be some small impact on residents' travel behaviour from the introduction of charges at the weekend and the higher charge level.

£17.50 pay 'next day' charge (up to three days after travel)

Background and context

The pay next day charge provides customers with an opportunity to pay the Congestion Charge at a slightly higher rate following their day of travel before they are issued with a PCN (penalty charge notice) for non-payment. The mechanism allows drivers to avoid a PCN if they remember to pay shortly after they have been in the CCZ. Prior to the pandemic, the pay next day charge was set at £14 (£2.50 above the usual charge) and customers only had one day to pay.

The pay 'next day' charge was temporarily increased to £17.50 (with three days to pay) in June 2020 as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed?

We are proposing that the pay 'next day' charge is set at £17.50 and that the deadline for making a delayed payment is three days after the day of travel. Failure to pay after that deadline will result in a PCN being issued in the normal way. This proposal provides drivers with additional time to pay the Congestion Charge and the proposed increase is in line with the previous difference between the Congestion Charge and pay next day charge (£2.50 difference).

Impact of the proposal

This proposal maintains the differential in the charge level for a delayed payment in line with the proposed charge level of £15. However, it is expected to benefit drivers as it provides them with additional days to pay the charge, albeit at a slightly increased level, before they are issued with a PCN.

Removing the Auto Pay and Fleet Auto Pay discounts

Background and context

Auto Pay was introduced in January 2011 and allows customers to be automatically billed monthly for the number of charging days on which their vehicle is used within the CCZ, providing they have an Auto Pay account. There are two forms of Auto Pay: Auto Pay and Fleet Auto Pay. Fleet Auto Pay is available for businesses with six or more vehicles, allowing them to add multiple vehicles to one account. It has the same benefits as standard Auto Pay and helps businesses to administer the Congestion Charge for larger fleets.

Auto Pay and Fleet Auto Pay were introduced to help make the process of paying the Congestion Charge simpler and to remove the risk of incurring a PCN for non-payment. To encourage people to adopt this form of payment, a £1 discount was given. This has been very successful, with more than three quarters⁶ of customers now paying via Auto Pay.

Even without the discount, it is still beneficial for customers to use Auto Pay and Fleet Auto Pay as it removes any administrative burden of paying for the Congestion Charge on a daily basis as well as the risk of receiving a PCN for non-payment and it is simple to use.

Auto Pay and Fleet Auto Pay discounts were removed as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed?

We are proposing that the £1 discount for both Auto Pay and Fleet Auto Pay is removed. It is evident that the original reason for introducing the discount to incentivise uptake of the payment method has been successful and, therefore, the discount is no longer required. In addition, removing the discount reinforces that access to road space in central London should not be discounted for those who are liable to pay the full charge.

Impact of the proposal

This proposal continues to allow customers and businesses to benefit from the Auto Pay and Fleet Auto Pay systems. The original intention of the discount was to incentivise a new mechanism of charging, however, given high levels of use it is no longer considered necessary to provide a discount. It is not expected that this change alone will have a considerable impact on customers or businesses traveling into the CCZ, or traffic levels, though it will add an additional deterrent effect by eliminating what would otherwise be a reduction on the increased charge level.

⁶ Based on Congestion Charge payment activity for January–May 2021, on average around 76 per cent of customers paid via Auto Pay.

Retaining and adapting temporary reimbursement schemes

Background and context

Pre-pandemic, reimbursements were available for NHS staff and NHS patients in respect of certain journeys.

The eligibility criteria of the NHS staff and the NHS patient reimbursement schemes were expanded, and new arrangements introduced for care home workers, local authorities and charities as part of the temporary measures introduced in response to the transport challenges created by the pandemic.

What is proposed

We are proposing to either retain or adapt the reimbursement arrangements that were introduced as part of the temporary changes to ensure that people most vulnerable to infection from epidemics and pandemics continue to be protected and to facilitate essential trips made by NHS staff in times of exceptional or extraordinary circumstances including for commuting purposes.

The NHS staff reimbursement arrangement would continue in its expanded form.

The NHS patient, care home workers and local authorities and charities reimbursement criteria would be modified to replace COVID-19 specific references with 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 COVID-19 pandemic.

Impact of the proposal

Continuation of the reimbursements is expected to have a positive impact on specific groups in exceptional circumstances, but is not expected to result in significant traffic impacts.

Removal of resident online and app payments for consecutive charging days

Background and context

Holders of the residents' discount can currently pay for multiple consecutive charging days by post, call centre, App or online, and may also pay for any number of charging days by Auto Pay.

What is proposed

We are proposing to remove the ability for residents to pay by App or online for multiple consecutive charging days. Resident payments for multiple consecutive charging days will

still be able to be made by post or via the call centre and residents will still be able to pay for any number of individual charging days by Auto Pay.

Impact of the proposal

The number of residents who do not use Auto Pay is relatively small, the frequency of purchases of multiple consecutive charging days is low and alternative payment channels will remain available, therefore, this proposal is not expected to have a significant impact on holders of the residents' discount.

6. Summary of the Integrated Impact Assessment

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

The objective of an Integrated Impact Assessment (IIA) is to understand the impacts of proposals, both positive and negative, of the following assessment areas:

- Equality impacts;
- Business/economic impacts;
- Environmental impacts;
- Health impacts.

Each assessment includes a baseline, objectives, evidence of likely impacts of the proposals, assessment of these against the objectives, and a summary of potential positive and negative impacts. An IIA also identifies possible measures to enhance the positive impacts of proposals and mitigate against the negative impacts. They often include engagement with stakeholders to understand the impact of the proposals on relevant groups.

Following a competitive procurement process, we commissioned Jacobs to undertake an IIA on the proposed changes to the Congestion Charge. The full document can be found on the consultation website, with a summary provided below.

The wider impacts of the proposed package

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. Each of the theme-focused assessments was undertaken to an agreed scope with relevant baseline.

The people category includes an assessment of 'protected characteristic' groups. This enabled Jacobs to understand how the proposals could impact all the protected characteristic groups (age, disability, sex, race, pregnancy or maternity, gender reassignment, religion or belief, and sexual orientation) and those from deprived areas / on low incomes. It also demonstrates how we have discharged the Public Sector Equality Duty when developing and deciding to put the proposed changes forward for consultation. Together with the consultation responses and any updates, the IIA will also be relied on by

the Mayor when making his decision whether to implement the proposed changes or not, including whether to make any modifications to them.

The IIA assessment compares the new proposals against the equivalent features of the pre-pandemic scheme, rather than comparing against temporary circumstances when many people would not have been travelling in the usual way. Overall impacts were determined according to their scale (extent of impact) and sensitivity (response to impact). Each impact identified was given an impact rating from -3 (major negative) to +3 (major positive). In the people section, protected characteristic groups that are particularly impacted by the proposals, either positively or negatively, are identified.

The full report is available to read as part of the supporting information for this consultation. Key findings are summarised below.

Environment



Reduction (approximately 1.5 per cent) in annual emissions of NO_x, PM₁₀ and PM_{2.5} within central London.

Reduction (approximately 1.5 per cent) in annual emissions of CO₂ within central London.

Economy



Neutral impacts overall on employment and businesses, with potential for minor impacts for some sectors (retail, accommodation and food services, arts and recreation)

Wider supply chains will be affected by the proposals but the overall impact on London's wider economy is expected to be neutral

People (including health and equalities)



Reduction in pollutant emissions leading to positive health outcomes particularly for people living in the boroughs within the CCZ.

Increase in active travel in central London.

Improvement in bus and taxi journey times and reliability.



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.

Increased costs to PHV drivers unable to spread additional costs across multiple trips.

Reduction in travel by individual with a fear for their safety on public transport, walking or cycling.

Potential increase in crowding on public transport.

Increased costs for disabled drivers – particularly at weekends – who do not qualify for blue badge.



Impact upon mental and physical health due to a reduction in traffic making the streets more attractive to socialise/walk/cycle on.

Improvements in road safety as a result of a reduction in congestion.



Potential reduction in noise levels likely to be imperceptible.

Mitigated or partly mitigated impacts

Financial impact for people in certain low income jobs and charities delivering mobile services using motorised transport during weekend charging hours. *Impacts on charities providing services in response to pandemics or epidemics would be mitigated by retaining the temporary charities reimbursement.*

Increased cost for those providing privately funded or voluntary care and those accessing healthcare who are unable use public transport or active travel. Particular impact on pregnant women travelling into the CCZ for medical appointments. *Partially mitigated by NHS patient reimbursement (including for pregnant women where they are vulnerable to infection during pandemics or epidemics).*

Short-term impact upon people with underlying health conditions vulnerable to coronavirus travelling by public transport if they are not eligible for reimbursements. *Mitigated by retaining the temporary NHS patient reimbursement criteria relating to those vulnerable to infection during a time of pandemic or epidemic.*

7. Next steps

We would like to hear your views on our proposals for changes to the Congestion Charge. You can access the questionnaire for these proposals [here](#).

In addition to this document you can read more about the expected impacts, both positive and negative, of these proposals in the [Integrated Impact Assessment](#).

Appendix B: Marketing materials and questionnaire

Appendix B: Marketing materials and questionnaire

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Appendix B 1: Consultation webpage

I



[Home](#) » [Planning for the future - policy hub](#) » [New Congestion Charge proposals](#)

New Congestion Charge proposals

Transport for London is proposing changes to the central London Congestion Charge.

Since its implementation in 2003, TfL has made changes to the Congestion Charge to ensure it remains effective, including changes to discounts and exemptions, charge level and days/times of operation. Last year we made temporary changes to the charge in response to the transport challenges presented by the pandemic, including operating daily until 22:00.

Our proposals

The proposals we are now consulting on are:

- A daily charge of £15
- Reducing the hours of operation from 07:00 to 22:00 each day, to between 07:00-18:00 Monday to Friday and between 12:00-18:00 at weekends and on Bank holidays
- There would be no charge between Christmas and New Year

- A discount of 90% for residents living in the Congestion Charge zone
- A pay next day charge of £17.50, and the deadline for making a delayed payment is three days after the day of travel
- No discount for payments made by Auto Pay or Fleet Auto Pay
- Retain reimbursement arrangements which would apply in exceptional circumstances

The new proposals are part of the commitment by the Mayor of London and TfL to reduce traffic and congestion in central London. This would improve London's air quality and encourage more journeys to be made by walking, cycling or public transport.

Have your say

We would like to hear your views on these proposals for changes to the Congestion Charge.

You can do this by completing the [online survey](#) on this site, providing your comments no later than Wednesday 6 October 2021.

We also want this consultation to be accessible to everyone. There is an [Easy Read version of our materials](#) in the 'Documents' section. There is also an [Easy Read version of our survey](#). In the bottom right-hand corner there are also British Sign Language videos of the proposals and the survey (audio versions of these are available in the 'Documents' section). If you need to translate this page into another language, please use the 'Select language' button in the bottom-left hand corner of this page.

To take part you will need to register with your email address. Your details will be kept secure and only used, with your permission, to update you about the outcome of the consultation and our next steps.

If you prefer not to complete the survey, then please submit your response to us in writing to ccyourview@tfl.gov.uk or FREEPOST TFL HAVE YOUR SAY (no stamp needed).

Information to help you respond

Have a look at our [Frequently Asked Questions](#). These will be updated during the consultation as questions come in.

There is additional information in the 'Documents' section of this page. This includes:

- [A summary of our proposals](#)
- [A map of the congestion charge zone](#)
- Easy read versions of the [materials](#) and [survey](#)

If you'd like more detailed information, there is also:

- [Supplementary information](#) - this contains information on the Congestion Charge scheme, the proposed changes to the scheme including why we are proposing them, the expected traffic impacts as well as the potential wider impacts
- [Integrated Impact Assessment](#) - the full IIA is a lengthy report and contains more information on our rationale as to why change is needed, plus forecast impacts of the proposed changes on travel patterns, the environment, people (health and equalities) and economy/business. The report has an Executive Summary.
- [Variation Order](#) - a legal document setting out the basis for the proposed changes
- [A copy of our consultation survey](#), in case you would prefer to complete it offline and post it to our Freepost address (which is FREEPOST TFL HAVE YOUR SAY)

Survey

Questions

New Congestion Charge proposals survey

Please share your views by taking part in our online survey. It should take you no more than 10 minutes to complete. Please note you will be required to register on Have your say to take part in the survey and your existing Congestion Charge or Oyster account details will not work.

If you prefer not to complete the survey, then please submit your response to us in writing to:

- ccyourview@tfl.gov.uk or
- FREEPOST TFL HAVE YOUR SAY (no stamp needed)

Please note that responses to the survey will be made publicly available after the consultation has closed in the form of a report on the results. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

Appendix B 2: Radio advert script

SFX: *General ambient background of light traffic in London.*

VO: Transport for London is proposing changes to the central London Congestion Charge.

The proposals are part of the commitment by the Mayor of London and TfL to:

reduce traffic and congestion in central London,
improve London's air quality,
increase the number of people walking, cycling
or using public transport.

To have your say visit tfl.gov.uk/ccyourview

Consultation ends on Wednesday 6 October.

To the Mayor of London and TfL, every journey matters.

30 seconds long.

Appendix B 3: Stakeholder email

Sent 28 July 21

Subject: Proposed changes to the central London Congestion Charge

Dear Stakeholder

We'd welcome your views on proposed changes to the Congestion Charge.

Last year, in response to the transport challenges of the pandemic and the Government's emergency funding of Transport for London (TfL), we made temporary changes to the Congestion Charge. This included extending its charging hours until 22:00 each day and increasing the charge level to £15. We are now consulting on new proposals. The proposals include reducing the charging hours to between 07:00 and 18:00 Monday to Friday and 12:00 to 18:00 at weekends.

The new proposals are part of the commitment by the Mayor of London and TfL to reduce traffic and congestion in central London. This would improve London's air quality, reduce carbon emissions and encourage more journeys to be made by walking, cycling or public transport.

The proposed changes are:

- £15 charge level
- No Auto Pay or Fleet Auto Pay discount
- £17.50 pay next day charge, and can be paid up to three days after travel
- The charging hours would be Monday to Friday from 07:00 – 18:00 and Saturdays, Sundays and Bank Holidays from 12:00 – 18:00
- No charge from Christmas Day to New Year's Day bank holiday (inclusive)
- 90 per cent residents' discount, re-opened to new applicants
- Reimbursement arrangements for certain NHS patients, care home workers, local authority and charity workers or volunteers providing certain services during epidemics or pandemics prevalent in Greater London. The expanded NHS staff reimbursement is also proposed to continue.

To find out more about our proposals and to have your say please contact us:

Online: tfl.gov.uk/ccyourview

Email: ccyourview@tfl.gov.uk

Post: FREEPOST TFL HAVE YOUR SAY (no stamp required)

The consultation closes Wednesday 6 October 2021.

Once it has closed, TfL will prepare a report summarising all of the responses for the Mayor, who will decide how to proceed.

Yours sincerely



Alex Williams

Director of City Planning

Appendix B 4: Stakeholder reminder email

Sent 14 September 21

Subject: Proposed changes to the central London Congestion Charge

Dear Stakeholder

As you may know, we are currently consulting on proposed changes to the Congestion Charge.

Thank you to those that have responded already.

If you have not yet responded and plan to do so, this is a reminder that you have until **Wednesday 6 October 2021**.

To find out more about our proposals and to have your say please contact us:

Online: tfl.gov.uk/ccyourview

Email: ccyourview@tfl.gov.uk

Post: FREEPOST TFL HAVE YOUR SAY (no stamp required)

Yours sincerely

A handwritten signature in black ink that reads "Alex Williams". The signature is written in a cursive, flowing style.

Alex Williams


Director of City Planning

Appendix B 5: Customer Relationship Management email


We would like your opinion on proposed
Congestion Charge changes

Can't see this email? [View online](#)

[Home](#)[Plan a journey](#)[Status updates](#)



Transport for London



Dear Jon,

We are proposing changes to the Congestion Charge to help reduce traffic and improve air quality in central London.

These changes include:

- The days and hours when the charge would apply
- How much the charge would be
- Discounts for residents living in the zone

For more information on our proposals and to share your views, please [visit our consultation page](#).

The consultation will run until Wednesday 6 October.

Yours sincerely,

Alex Williams
Director of City Planning

Appendix B 6: Leaflet to residents

Have your say on proposed changes to the Congestion Charge



MAYOR OF LONDON

 **TRANSPORT FOR LONDON**
EVERY JOURNEY MATTERS

Last year we made temporary changes to the Congestion Charge, which meant it operated until 22:00 each day. We are now consulting on changes to the charge, including:

- A 90% discount for residents living in the Congestion Charge zone
- A daily charge of £15
- Reducing the hours of operation from 07:00 to 22:00 each day, to between 07:00-18:00 Monday to Friday and between 12:00-18:00 at weekends and bank holidays
- A no charge period between Christmas and New Year


The proposals are part of the commitment by the Mayor and TfL to reduce traffic and congestion in central London. This would improve London's air quality and increase the number of people walking, cycling and using public transport.

Consultation ends Wednesday 6 October 2021

To find out more and provide us with your views please contact us:

Online: tfl.gov.uk/ccyourview
Email: ccyourview@tfl.gov.uk
Post: **FREEPOST TFL HAVE YOUR SAY (no stamp required)**

Our website has a summary of the proposals in easy read, audio and British Sign Language video. If you don't have access to the internet, or would like a paper copy of the response form or the information in any other formats please contact us using the details above.



Have your say

Appendix B 7: Press advert

Have your say on proposed changes to the Congestion Charge

Last year we made temporary changes to the Congestion Charge, which meant it operated until 22:00 each day. New proposals include reducing the hours of operation to between 07:00 and 18:00 Monday to Friday and 12:00 to 18:00 at weekends.

The proposals would continue to help reduce traffic and congestion. This would improve London's air quality.

Other proposals include:

- How much the charge would be
- Discounts for residents living in the zone

Consultation ends Wednesday 6 October 2021

To find out more and provide us with your views, please visit tfl.gov.uk/ccyourview

**Have
your
say**



MAYOR OF LONDON



Appendix B 8: online and mobile advertising banners

Congestion Charge Consultation MPU – 300x250



Have your say
on proposed
changes to the
Congestion Charge

To help reduce
traffic and
improve air quality
in the zone

Consultation
ends Wednesday
6 October



Find out more

MAYOR
OF LONDON



Congestion Charge Consultation Leaderboard – 728x90

Have your say on proposed
changes to the Congestion Charge



To help reduce traffic and
improve air quality in the zone



Consultation ends
Wednesday 6 October



MAYOR OF LONDON

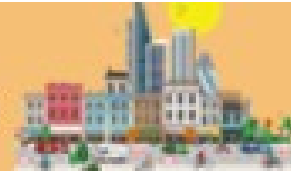
Have
your
say

Find out
more ›

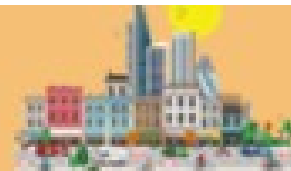


Congestion Charge Consultation Mobile Banner – 320x50

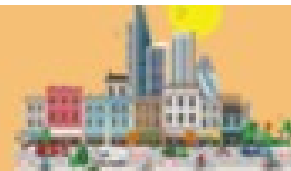
Have your say on proposed
changes to the Congestion Charge



To help reduce traffic and
congestion in central London



Consultation ends
Wednesday 6 October



Have
your
say

Find out
more ›



Appendix B 9: Metro article

Articles run on 29 July, 9 August and 27 September

Have your say

LONDONERS are being encouraged to have their say on proposed changes to the Congestion Charge in the capital.

Following temporary changes made last year to the charge, which saw it operate until 10pm each day across the Congestion Charge zone, TfL is consulting on a range of changes.

These include reducing the operating hours from 7am until 10pm to 7am until 6pm on weekdays, and midday until 6pm on weekends and bank holidays.

Other proposed changes include a 90 per cent discount for residents living within the zone, a daily charge of £15, and stopping the Congestion Charge between Christmas and the New Year.

The proposals are part of the commitment by TfL and the Mayor to reduce traffic and congestion in central London. This would help improve air quality and increase the number of people walking, cycling and using public transport.

The consultation will remain open until October 6 2021. For more information on the proposed changes and to have your say on the consultation, visit the website at tfl.gov.uk/ccyourview

Appendix B 10: Press release

New Congestion Charge proposals for sustainable travel in central London

28 July 2021

No charge in the evenings to support London's culture, hospitality and night-time businesses

"As we look to the future it's vital the charge strikes the right balance between supporting London's economic recovery and helping ensure it is a green and sustainable one. These proposals support the capital's culture, hospitality and night-time businesses which have struggled so much, as well as encouraging people to walk, cycle and use public transport"

Sadiq Khan

Mayor of London

In accordance with the condition in the Government's first emergency funding agreement - required due to TfL's income being decimated by the pandemic when ridership plummeted - TfL urgently brought forward proposals to temporarily widen the scope and level of the Congestion Charge in June 2020.

The operational hours of the charge were extended to include evenings and weekends, and the charge was increased from £11.50 to £15.

Since then, the Mayor has been clear that the temporary charges should be reviewed to ensure a strong economic recovery in London and one that is environmentally sustainable and fair to all.

TfL is today (28 July) opening a consultation and seeking views on the future operation of the Congestion Charge.

The main proposals include no charges in the evenings to support London's recovery, operating between 12:00-18:00 on weekends and retaining the current charge level of £15.

These changes will support London's culture, hospitality and night-time businesses and also ensure gains made in reducing car dependency over more than 15 years are not lost and the capital's recovery from the pandemic is a green and sustainable one.

High levels of traffic make deliveries less reliable, delay bus journeys, worsen air pollution and make it less safe for people walking and cycling.

Congestion is also damaging to the economy; in 2017, drivers in London spent an average of 71 hours in gridlock during peak hours, contributing to congestion costing London £9.5 billion in 2017*.

The Mayor's target is for 80% of trips made in the capital in 2041 to be by walking, cycling or public transport, and the target for central London is 95% of trips to be made by these types of travel.

Reducing congestion

The proposed new weekend charging hours are targeted at reducing congestion at the busiest times. Weekend car and private hire traffic before the pandemic was higher than during the week and made up 70% of traffic in the charging zone on a Saturday and Sunday.

If the proposed new weekend hours are brought in, it is estimated there will be an increase in sustainable travel compared to before the pandemic, with around 8,000 new public transport trips and 3,000 walking and cycling trips each day on the weekend.

To boost London's culture, hospitality and night-time businesses, as well supporting shift workers who perform essential roles in the central London economy, the plans include the charge stopping at 18:00 on weekdays.

This is in line with the pre-pandemic hours, rather than the current 22:00 finish time. Evening traffic data will be kept under review, given that weekday travel patterns in particular remain uncertain.

Following feedback from those living in central London, the plans include opening up the 90% residents' discount to new applicants. The discount has been closed to new applicants since 1 August 2020.

Other proposals include:

- No charge between Christmas Day and New Year's Day inclusive
- The charge to be in operation on bank holidays from 12:00-18:00
- Being able to pay up to three days after travel

The pandemic has brought into sharp focus the need to protect the vulnerable and those involved in caring for them, so TfL is also consulting on retaining recently expanded reimbursement schemes for NHS patients, care workers, local councils and charities during epidemics and pandemics.

The pre-pandemic NHS staff and patient reimbursement arrangements will continue.

Attractive option

TfL continues to ensure that public transport remains an attractive option as part of the recovery from the pandemic.

A wide range of additional measures including an enhanced cleaning regime with hospital-grade substances mean the network is cleaner than ever before. Regular independent testing by Imperial College has found no traces of coronavirus on the public transport network.

The Mayor of London, Sadiq Khan, said: 'The Government insisted on the widening of the level and scope of the Congestion Charge last year as a condition of TfL's emergency funding agreement - which was only needed because of the pandemic.

'As we look to the future it's vital the charge strikes the right balance between supporting London's economic recovery and helping ensure it is a green and sustainable one.

'These proposals support the capital's culture, hospitality and night-time businesses which have struggled so much, as well as encouraging people to walk, cycle and use public transport.

'We must not replace one public health crisis with another due to filthy polluted air, and our measures to create more space for walking and cycling have already had a huge impact. I urge Londoners to have their say and take part in the consultation.'

Alex Williams, TfL's Director of City Planning, said: 'These proposals are aimed at ensuring that travel in and around the heart of the city is sustainable in the long term.

'We know that the charge plays a vital role in helping the logistics industry reach its customers on time and in encouraging people to walk, cycle and take public transport.

'It is also a time when theatres, restaurants and other cultural attractions are trying to get back on their feet again, which is why, after listening to industry bodies, the plans include the charge only being in place during the day.

'This is a balanced package of measures and I would encourage people to have their say in the consultation.'

Since May 2020, more than 100km of new or upgraded cycle lanes have been built or are under construction, along with more than 22,500 square metres of extra pavement space reallocated for people walking.

The measures mean people are increasingly using bikes to get around their local area and for exercise, with recent TfL data showing cycling has increased by 22% in outer London compared to spring 2019, with a seven per cent rise in inner London.

Much needed boost

Kathryn McDowell CBE, Managing Director of London Symphony Orchestra, said: 'This is great news for the LSO and the performing arts in London, especially as we open our doors to full houses in the autumn season.

'We know from audience research that for some people, the lifting of the evening congestion charge will enable them to attend evening events in central London, and it will certainly give the night-time economy a much needed boost as we recover from the pandemic.'

Mark Davyd, CEO of Music Venue Trust, said: 'We warmly welcome this step on the Congestion Charge by the Mayor of London. Grassroots music venues in London desperately need all the help they can get to recover from the impact of this crisis. 'The Mayor has been consistent in his support for live music right from the first days of the pandemic and throughout the last 18 months, and this is another sensible measure that encourages artists and audiences to come together as we try to Revive Live.'

Lohan Presencer, Chairman of Ministry of Sound, said: 'This is good news for the night-time economy, making it easier for staff to travel to and from work and for customers to return to late night venues.'

Cameron Leslie, Director of Fabric, said: 'We're really pleased that the Mayor has rolled back the Congestion Charge to 18:00.'

'Any measure to encourage people back into central London at this time by whatever mode of transport should be wholeheartedly supported. The night-time economy needs all the support it can get.'

Sir Nicholas Kenyon, Managing Director of the Barbican, said: 'It is wonderful to see audiences flocking back to the live arts in London, and the lifting of the evening Congestion Charge would be a huge help in putting culture and events at the heart of the capital's recovery.'

Julian Bird, CEO of the Society of London Theatre, said: 'The theatre industry welcomes this consultation; removing the Congestion Charge in the evenings will help support our sector's pandemic recovery, benefitting audiences and theatre workers travelling into the West End.'

Elaine Bedell, CEO Southbank Centre, said: 'The Southbank Centre is supportive of these proposals to the Congestion Charge which will be of significant benefit to our audiences and visitors and we welcome the opportunity this consultation provides for people to have their say.'

Huw Davies, Deputy Managing Director, Royal Philharmonic Orchestra (RPO), said: 'As an organisation that is heavily dependent on audiences coming into

London to attend evening concerts, the RPO warmly welcomes the proposal to bring forward to 18:00 the end of the congestion charge.

'We hope that this initiative will help stimulate and rebuild London's night-time economy, which has, for more than 16 months, been so badly impacted by the pandemic.

'The RPO looks forward to welcoming audiences old and new to its London concerts during its 75th Anniversary Season and is grateful to the Mayor for this gesture of support.'

* TfL's Freight Strategy (page 34): <http://content.tfl.gov.uk/freight-servicing-action-plan.pdf>

Notes to editors

- It is proposed that the discount for using AutoPay will be removed, after high take-up of the option. Customers will continue to benefit from the convenience of the automatic payment
- The proposals plan to retain the current £17.50 charge for paying in the three days after travel
- Residents' ability to pay for consecutive days online and via the app will be removed, following the successful widespread take-up of AutoPay
- Other discounts and exemptions, including the Blue Badge Discount and Cleaner Vehicle Discount, are unaffected by the new proposals
- If these proposals are taken forward following the consultation, the changes to hours will take place on 28 February 2022, giving time for signage to be updated. Other proposals will be implemented immediately after a mayoral decision on the changes
- The consultation closes on Wednesday 6 October 2021. To respond, visit : tfl.gov.uk/ccyourview
- The following table lays out the proposed changes, alongside the pre-pandemic scheme and the temporary changes made in response to the pandemic

	Pre-pandemic scheme up to 22 June 2020	Temporary Changes to the Congestion Charge from 22 June 2020	Proposed changes to the Congestion Charge
Charge level	£11.50	£15	£15
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	Mon - Fri, 0700-1800	Mon - Sun, 0700-2200	Mon - Fri, 0700-1800; Sat, Sun & bank holiday, 1200-1800
Non- charging days	Bank holidays and the days between Christmas Day and New Year's Day	Christmas Day	Christmas Day to New Year's Day bank holiday (inclusive)
Residents' discount	90 per cent for all residents following registration for discount	90 per cent residents' discount closed to new applicants from 1 August 2020	90 per cent for all residents following registration for discount
Reimbursements	NHS staff and patient reimbursement arrangements	NHS staff and patient reimbursement schemes extended, and new reimbursement arrangements for care home workers working at care homes in the Congestion	Extended NHS staff arrangements. Extended NHS patient reimbursement for patients vulnerable to risk of infection during an epidemic or pandemic.

		Charging Zone and charities and local authorities' workers providing certain services.	Reimbursements for care home workers working at care homes in the Congestion Charging Zone and charities and local authorities' workers providing certain services during the current and any future pandemic or epidemic prevalent in Greater London.
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Appendix B 11: London Gazette notice

OTHER NOTICES

OTHER NOTICES

COMPANY LAW SUPPLEMENT

The Company Law Supplement details information notified to, or by, the Registrar of Companies. The Company Law Supplement to the London, Belfast and Edinburgh Gazette is published weekly on a Tuesday.

These supplements are available to view at <https://www.thegazette.co.uk/browse-publications>.

Alternatively use the search and filter feature which can be found here <https://www.thegazette.co.uk/all-notices> on the company number and/or name. (3725082)

COMPLETION OF CROSS-BORDER MERGER

Notice is hereby given that a formal notification was received by me confirming the completion of a cross-border merger under Directive 2005/56/EC. Details are as follows:

Date of receipt of notification: 10 July 2021

Effective date of Merger 3 June 2021

Merging companies:

1 – Texnova Limited – Company Number 06157480 (England & Wales)

2 – Texnova Technik GmbH – Company number HRB 15330 PI (Germany)

New company:

3 – Texnova Technik GmbH – Company number HRB 15330 PI (Germany)

Louise Smyth

Registrar of Companies for England and Wales (3852321)

IXTHUS CHURCH COUNCIL

Notice is hereby given by the Executive Committee of the Ixthus Church Council that Reverend Margaret Jeptui Tanui having been properly elected Bishop under the auspices of the Ixthus Church Council (ICC), having gone through the due process of scrutiny by the Executive Committee of the ICC and having successfully satisfied all the other requirements pertaining to the rank of Bishop, is approved by the Executive Committee to be recognized, consecrated and licensed as a Pentecostal free standing Bishop of Valley Of Praise Ministries International.

Objections are invited in writing to the Secretary of the Ixthus Church Council, Global Headquarters Office, 193-195 Fore Street, Angel Place, Edmonton, London, N18 2UD, England within 67 days of the appearance of this notice, after which Bishop-Elect, Reverend Margaret Jeptui Tanui will be received by the ICC Bishops and empowered by the ICC constitution to conclude this process.

His Eminence, Archbishop Dr. A. C. C. Evangelou MBE, ICC International President (3852325)

LONDON BOROUGH OF BARKING AND DAGENHAM

PUBLIC NOTICE

SECTION 123 LOCAL GOVERNMENT ACT 1972

Notice is hereby given in accordance with Section 123(2A) of the Local Government Act 1972 that London Borough of Barking and Dagenham (the "Council") intends to dispose of an area of public open space being land at Wedderburn Road, IG11. The area of open public space to be disposed of measures 311 sqm.

The Notice and plan showing the approximate position of the affected land will be posted on the window of the Barking Learning Centre, 2 Town Square, Barking IG11 7NB and also on the Council's website at: <https://www.lbbd.gov.uk/open-spaces-public-notices>.

Any objections or representations regarding the proposed disposal of Wedderburn Road, IG11 should be made in writing to Mr Ron Chaggar, Barking Town Hall, 1 Town Square, Barking IG11 7LU to be received no later than 5pm on 27 August 2021. The grounds for any objection should be stated.

Dated: 23 July 2021 (3852322)

LORDSHIP OF THE MANOR OF BEGBROKE IN THE COUNTY OF OXFORDSHIRE

NOTICE is hereby given that Joan Renter Ranz, Esq. is seized with Full Title Guarantee of the legal and beneficial title and ownership of the Lordship of the Manor of Begbroke in the County of Oxfordshire together with all the rights, intellectual property, manorial land, incidents, members and appurtenances thereto belonging, the same having been acquired for good and proper consideration on 11th May 2021. Inquiries should be directed to Mr M Baxendale Solicitor of Newhall Solicitors LLP, 83 Newhall Street, Birmingham B3 1LH and to the Manorial Society of Great Britain, 104 Kennington Road, London SE11 6RE. (3852323)

TRANSPORT FOR LONDON

GREATER LONDON AUTHORITY ACT 1999

CONGESTION CHARGING

TRANSPORT FOR LONDON as the charging authority, hereby gives notice that it has made an Order under the Greater London Authority Act 1999 entitled the Greater London (Central Zone) Congestion Charging (Variation) Order 2021 ('the Congestion Charging Variation Order').

The Congestion Charging Variation Order further amends the Greater London (Central Zone) Congestion Charging Order 2004 which was made by Transport for London on 30 September 2004, confirmed with modifications by the Mayor of London on 27 October 2004 and has subsequently been varied.

The Congestion Charging Variation Order provides for the following proposed changes:

- 1) The level of charge would be set at £15;
 - 2) The hours of operation would be between 07:00 - 18:00 Monday to Friday and 12:00 - 8:00 at weekends and on Bank Holidays;
 - 3) The charge would not apply during the period between Christmas Day and the New Year's Day bank holiday (inclusive);
 - 4) The pay next day charge would be set at £17.50, and the deadline for making a delayed payment would be three days after the day of travel;
 - 5) There would be no discount for paying by Auto Pay or Fleet Auto Pay;
 - 6) The 90 per cent discount for residents living in the Congestion Charge zone would be open to new applicants;
 - 7) Residents would be able to pay for consecutive charging days by post or call centre;
 - 8) Reimbursement arrangements would be available during epidemics and pandemics prevalent in Greater London for NHS patients who are vulnerable to risk of infection and unable to travel by public transport, care home workers working at care homes in the Congestion Charging Zone and local authorities and charity workers or volunteers providing certain services. The expanded NHS staff reimbursement and usual NHS patient reimbursement arrangements would continue.
- Consultation materials including the Congestion Charging Variation Order may be viewed at tfl.gov.uk/ccyourview or may be obtained by emailing ccyourview@tfl.gov.uk. A summary of the proposals in easy read, audio and British Sign Language Video is also available. Paper copies and other formats are available on request.

Transport for London invites the making of representations on, or objections to, the proposed changes. Any representations that are submitted must be made in writing and be received by 6 October 2021. Representations may be sent to ccyourview@tfl.gov.uk or by post to: **Freepost TFL HAVE YOUR SAY (No stamp required)**

Dated: 26 July 2021

Gareth Powell

Managing Director, Surface Transport (3852324)

Appendix B 12: Questionnaire

New Congestion Charge proposals survey

Please share your views by taking part in our online survey. It should take you no more than 10 minutes to complete.

If you prefer not to complete the survey, then please submit your response to us in writing to:

- ccyourview@tfl.gov.uk or
- FREEPOST TFL HAVE YOUR SAY - Congestion Charge (no stamp needed)

Please note that responses to the survey will be made publicly available after the consultation has closed in the form of a report on the results. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

Our aims

Our aims are to reduce traffic and congestion in central London to help achieve the objectives of the Mayor's Transport Strategy (MTS), including:

- Reducing private car use in central London;
- Increasing trips made by walking, cycling or public transport;
- Improving journey times for essential traffic including emergency services, buses and freight;
- Helping to eliminate deaths and serious injuries from our roads;
- Improving air quality and reducing carbon emissions; and
- Creating vibrant and attractive open spaces

How important is it to you that we take steps to reduce traffic and congestion in central London?

(Choose any one option)

- ☐ Very important
- ☐ Fairly important
- ☐ Important
- ☐ Slightly important
- ☐ Not at all important
- ☐ No opinion

How important is it to you that we take steps to increase the number of people walking, cycling and using public transport in central London?

(Choose any one option)

- ☐ Very important
- ☐ Fairly important
- ☐ Important
- ☐ Slightly important
- ☐ Not at all important
- ☐ No opinion

Proposed changes

The Congestion Charge scheme is an important tool for managing traffic and congestion in central London. It has been kept under review to ensure it remains effective against this and to support delivery of the objectives of the Mayor's Transport Strategy. Last year we made temporary changes to the scheme, including operating it daily until 22:00.

We are now proposing changes to the level of charge, the hours and days of operation, discounts for residents living in the zone, the next day charge, Auto Pay discounts and reimbursements. For full details please see the consultation materials. If introduced, these proposed changes would come into effect later this year immediately following the decision to make them. The exception would be the proposed new charging hours and days, which would come into effect on 28 February 2022 to allow time to make changes to technology systems and on-street signage.

How effective do you consider the following proposed changes to the Congestion Charge scheme would be in achieving our aims set out above?

Questions	No effect	Minor effect	Moderate effect	Major effect	Don't know
Set the level of the Congestion Charge at £15.00 (Since June 2020, the charge level has been set at £15.00 as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Operate the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday). (This is the same as before the pandemic. Since June 2020, charging hours have been 07:00 to 22:00 on weekdays as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Operate the Congestion Charge on Saturday and Sunday and on bank holidays between 12:00 and 18:00 (but not in the period between 25 December and the New Year's Day bank holiday). (Since June 2020, charging hours have been 07:00 to 22:00 on Saturdays, Sundays and bank holidays (except Christmas Day), as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Reopen applications for the residents' discount of 90 per cent of the Congestion Charge. (Since August 2020 the residents' discount has been closed to new applications as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Increase the "pay next day" charge to £17.50 and extend the deadline for making payment to three days. (Since June 2020, the charge has been set at £17.50 with three days for delayed payment as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
No discount for payments made by Auto Pay or Fleet Auto Pay. (Since June 2020, no discount has been given for payments made by Auto Pay or Fleet Auto Pay as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					

How important is it to you that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London (existing reimbursement arrangements in other circumstances are proposed to continue)?

(Choose any one option)

- ☐ Very important
☐ Fairly important
☐ Important
☐ Slightly important
☐ Not all important
☐ No opinion

Do you have any further comments about the proposals? Please note which proposal(s) your comments are about.

If you have identified any positive or negative impacts in the previous question please let us know any suggestions to mitigate those negatives or enhance those positives. Please note which proposal(s) your comments are about.

Are you a resident in the Congestion Charge zone?

(Choose any one option)

- ☐ Yes
- ☐ No
- ☐ Don't know

Are you registered for a discount or exemption to the Congestion Charge or have you used a reimbursement arrangement?

(Choose any one option)

- ☐ Yes
- ☐ No
- ☐ Don't know

If relevant, please state the discount or exemption you are registered for or the reimbursement scheme you have used (please tick all that apply).

(Choose all that apply)

- ☐ Discount - residents (90%)
- ☐ Discount - Blue Badge holders
- ☐ Discount - accredited breakdown
- ☐ Discount - vehicles with 9+ seats
- ☐ Discount - cleaner electric and certain plug-in hybrid vehicles
- ☐ Discount - motor tricycles
- ☐ Discount - roadside recovery vehicles
- ☐ Exemption - two wheeled motorcycles and mopeds
- ☐ Exemption - emergency service vehicles (police, ambulance, lifeboat and fire service vehicles exempt from Vehicle Excise Duty)
- ☐ Exemption - NHS vehicles that are exempt from vehicle tax
- ☐ Exemption - vehicles used by disabled people that are exempt from vehicle tax
- ☐ Exemption - vehicles for more than one disabled person that are exempt from vehicle tax
- ☐ Exemption - designated wheelchair accessible PHVs licensed with TfL (when fulfilling a booking)
- ☐ Exemption - taxis licensed by TfL
- ☐ Exemption - HM Coastguard and Port Authorities vehicles
- ☐ Exemption - certain borough operational vehicles
- ☐ Exemption - armed forces vehicles
- ☐ Exemption - Royal Parks Agency and Crown Estate Paving Commission vehicles
- ☐ Reimbursement - an NHS patient
- ☐ Reimbursement - NHS staff
- ☐ Reimbursement - a local authority employee
- ☐ Reimbursement - a charity employee or volunteer
- ☐ Reimbursement - working at a care home within the Congestion Charge zone

Are you (please tick all that apply)?

(Choose all that apply)

- ☐ A resident in the Congestion Charge zone
- ☐ A local business owner
- ☐ Employed locally
- ☐ A visitor to the area
- ☐ A commuter to the area
- ☐ Not local but interested in the scheme
- ☐ A taxi (black cab) driver
- ☐ A private hire vehicle driver
- ☐ Other (please specify)

How often do you drive in the Congestion Charge zone?

(Choose any one option)

- ☐ Every day
- ☐ 5-6 days a week
- ☐ 3-4 days a week
- ☐ 1-2 days a week
- ☐ 1-3 times a month
- ☐ Less than once a month
- ☐ Never

Can you please confirm if you are responding as an individual or as an official representative of an organisation (e.g. interest group, charity or trade body).

(Choose any 1 options)

- ☐ As an individual
- ☐ As an official representative of an organisation

If you are responding as an official representative of an organisation then please provide your organisation name below.

How did you hear about this consultation (the main way you heard)?

(Choose any one option)

- ☐ Received an email from TfL
- ☐ Received a leaflet from TfL
- ☐ Read about it in the press
- ☐ Heard a radio advert about it
- ☐ Saw it on the TfL website
- ☐ Social media
- ☐ Other (please specify)

What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

Questions	Very good	Good	Adequate	Poor	Very poor	Not applicable
Website structure & ease of finding what you needed						
Written information						
Maps, images & related diagrams						
Online survey format						
Website accessibility						
Promotional material						

Do you have any further comments about the quality of the consultation materials?

Appendix C: Integrated Impact Assessment (IIA)



TfL Proposed Congestion Charge Changes IIA
Proposed Congestion Charge Changes Integrated Impact Assessment

01 | 04
July, 2021

Transport for London

TfL Congestion Charge IIA

Project No: B2417100
Document Title: Proposed Congestion Charge Changes Integrated Impact Assessment
Document No.: 01
Revision: 04
Document Status: FINAL
Date: July, 2021
Client Name: Transport for London
Author: Jacobs UK Limited
File Name: CC IIA Report

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Executive Summary

Introduction

This report summarises the findings from the Integrated Impact Assessment (IIA) of the Proposed Changes to the Congestion Charge. The IIA provides an integrated assessment of the potential positive and negative effects on the environment, equalities, health and the economy. It also identifies mitigation measures to either enhance potential positive effects or minimise negative ones.

Policy Context

TfL's Proposed Changes to the Congestion Charging scheme sit within the context of the Mayor's strategic policies as set out in: Mayor's Transport Strategy (TfL, 2018) (MTS); the London Plan (GLA, 2021) and the Mayor's Environment Strategy (GLA, 2019).

The MTS is key to the delivery of the London Plan and the Mayor's Environment Strategy. It sets out that central London must remain very well connected, with world class public realm and safe air quality levels. It highlights the importance of bus services and that they are prioritised to ensure reliability. It is clear that given the fundamental importance of efficient movement to the continuing success of such a limited geographical area, the future of central London must involve steady reduction in car use.

The expected outcomes of the MTS include a 95 per cent mode share for walk/cycle/public transport for trips within Central London (up from 90 per cent in 2015) and a 99 per cent mode share for trips between central London and inner/outer London (compared with 95 per cent and 90 per cent respectively in 2015) by 2041.

Proposal 20 of the MTS commits the Mayor (through TfL) to keep existing and planned road user charging schemes (including the Congestion Charge) under review to ensure they prove effective in furthering or delivering the policies and proposals of the MTS. The Congestion Charge remains an important tool available to help manage demand for road space in central London and thereby deliver the vision of the MTS.

The Congestion Charge

Following its introduction in 2003, the Congestion Charge was very effective in reducing traffic levels and congestion in the CCZ, and it remains an integral part of managing demand for road space in central London and delivering the aims of the MTS. However, the MTS (TfL, 2018) highlighted those 15 years after the introduction of the Congestion Charge, the challenge facing central London had changed. Traffic levels in central London were at the highest in the evening, and weekend levels were broadly similar to weekday levels. Both evenings and weekends are outside of pre-pandemic charging hours.

In June 2020, a package of temporary changes to the Congestion Charge were introduced as emergency measures in response to the transport challenges brought about by the coronavirus pandemic (the Temporary Changes). The objectives were to prevent streets in central London becoming unusably congested and to support the transformation of London's streets as part of streetspace schemes.

Proposed Changes

A number of Proposed Changes to the Congestion Charge are being considered by TfL. They have been selected to promote the primary objective of reducing traffic and congestion in Central London. A range of options were considered and tested, including different charge levels and hours of operation, and the Proposed Changes were developed as a result of this analysis. The Proposed Changes are set out in Table 0-1 alongside the Pre-

Pandemic Scheme and the Temporary Changes introducing in June 2020 in response to the coronavirus pandemic.

Table 0-1: Comparison of proposed changes with Congestion Charge prior to June 2020 Temporary Changes

	Pre-pandemic scheme up to 22 June 2020	Temporary changes to the Congestion Charge from 22 June 2020	Proposed changes to / provisions in the Congestion Charge
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	Mon – Fri, 07:00 – 18:00	Mon – Sun, 07:00 – 22:00	Mon – Fri, 07:00 – 18:00; Sat, Sun & bank holidays, 12:00 – 18:00
Non- charging days	Bank holidays and the days between Christmas Day and New Year's Day	Christmas Day	Christmas Day to New Year's Day bank holiday (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, and new reimbursement arrangements for care home workers working at care homes in the Congestion Charging Zone and charities and local authorities' workers/volunteers	Extended NHS staff reimbursement arrangement. NHS patient reimbursement arrangement expanded to patients vulnerable to risk of infection during any future 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 future

		providing certain services.	pandemic or epidemic prevalent in Greater London.
--	--	-----------------------------	---

*The discounts and exemptions remain unchanged from the pre-pandemic existing scheme

This IIA is focused on the impact of the Proposed Changes compared with the pre-Pandemic scheme. The Temporary Changes have, to date, been in operation during periods of lockdown and social restrictions and so the impact of the Proposed Changes for many people resuming their activities would be in comparison to equivalent features of the pre-pandemic scheme for example, a higher charge level and additional hours of operation. Where people have been driving in the CCZ during the period of Temporary Changes, they may experience reduced impacts for example, if they were driving in the CCZ after 6pm or on weekend mornings given that these periods would not be charged in future under the Proposed Changes. We consider the most appropriate assessment to be a comparison between the new proposals against the equivalent features of the pre- pandemic scheme rather than comparing against temporary circumstances when many people would not have been travelling in the usual way. Therefore, the Temporary Changes are not themselves assessed, although relevant experience from their operation is referenced where it helps to inform the IIA.

The earliest TfL is proposing to introduce the Proposed Changes to the CCZ would be late 2021 or early 2022, subject to public consultation and Mayoral approval. The assessment will have a temporal scope of 10 years (to 2031). In line with the MTS, it is anticipated that TfL will keep the operation of the CCZ under regular review and further changes may be proposed within this timeframe which would require further assessment.

Approach to the IIA

The IIA process is a tool for identifying key impacts associated with the Proposed Changes to the Congestion Charge, including how negative impacts could be avoided or mitigated where possible, and how positive impacts could be enhanced. The IIA report brings together the findings of each of the assessments into one integrated document, where they are reported under three themes to be consistent with the structure of the MTS IIA:

- London's Environment (incorporating the Environmental Assessment)
- London's People (incorporating the Health Impact Assessment and the Equality Impact Assessment)
- London's Economy (incorporating the Economic and Business Impact Assessment).

Overall impacts have been determined against two assessment parameters: scale and sensitivity:

- Scale: the extent to which London's environment, people, and economy would be impacted (positively or negatively) by the proposals considering the numbers/proportion that would experience the impact within the area of assessment
- Sensitivity: this considers how those impacted might respond; whether they are able to absorb or adapt to the Proposed Changes where negatively impacted.

The overall impact is expressed on a rating from -3 to +3 (1 = minor; 2 = moderate; 3 = major) in accordance with the IIAs for previous proposed changes to the CCZ in 2018 and temporary changes made in 2020. Where negative impacts are assessed, potential further mitigation measures are identified for consideration by TfL.

Stakeholder Engagement

This assessment has been informed by a series of thematic stakeholder workshops held to discuss the potential impacts of the Proposed Changes and to explore potential mitigation measures. Three workshops - Business and Economy; Environment and Health; and Equality - were held in July 2021. In addition, a separate discussion was held with members of TfL's Independent Disability Advisory Group (IDAG) to discuss the likely impacts of the changes on disabled people.

Key points raised by stakeholders in the Business and Economy workshop were:

- Consideration should be given to workers unable to travel by public transport or active travel, for example musicians carrying heavy/bulky equipment, those experiencing public transport disruption especially as a result of early weekend engineering works, and low-income self-employed delivery drivers
- Increase in charge will impact on very low margin freight industry, for which many types of journey cannot be rescheduled to avoid the charge (e.g. delivery to construction sites). Absence of legislative requirements is hindering move towards freight consolidation
- Need to distinguish between immediate post-pandemic situation and longer-term ambition. Concerns that Proposed Changes will impact on short-medium term demand for domestic day trips to London, which is seen as a major growth opportunity during the post pandemic recovery. Next 12-18 months is critical for some smaller entertainment, food and drink and retail business
- Concern that Proposed Changes will lead to time shifts in vehicle movements and greater congestion before and after the charging period especially at weekends
- Impact on street traders/markets at weekends and the increased demand for immediate delivery of retail goods could put stores in CCZ at a disadvantage when serving customers outside the CCZ
- Perception that back office functions e.g. dealing with PCNs were not as efficient as they could be leading to higher costs for businesses

- Concern that Proposed Changes will lead to further consolidation of the PHV sector.

Key points raised by stakeholders in the Environment and Health workshop were:

- General improvements to air quality and carbon reduction due to reduced congestion were noted as positive impacts. However, it was highlighted that the diversion or re-routing of vehicles to avoid paying the Congestion Charge may increase ambient noise and air quality impacts for residents outside the CCZ. It was suggested that businesses operating within the CCZ could consolidate deliveries to counteract potential redistribution impacts and reduce vehicle trips further.
- In relation to accessibility and active travel, it was noted that an increase in the number of people choosing to cycle is being seen in London and the Proposed Changes could help to facilitate uptake of this mode. It was highlighted that road space for sustainable modes needs to be prioritised to allow for mode shift to continue. Additional facilities and cycle parking may be required to sustain the increase in the volume of bicycles, adapted bicycles and scooters on the street.
- PHV drivers were noted as being disproportionately impacted by the Proposed Changes and it was suggested that flat fee of charging across operators be mandatory to address this. It was noted that various charges impact on drivers' earnings and that these should be either be paid by the consumer or PHVs should be exempt from the charge.
- It was noted that larger numbers of people walking and cycling as a result of the Proposed Changes may result in an increase in road traffic collisions for these groups. More people walking on the streets in the evenings may have the additional benefit of making the streets safer, from a crime perspective. The fear of using public transport for vulnerable groups at risk of coronavirus due to the easing of pandemic restrictions was also highlighted as a concern.

Key points raised by stakeholders in the Equalities workshop were:

- Some religious services in central London which cater to specific nationalities or denominations attract worshippers from a large catchment area. A high proportion of these worshippers are older people who are unable to use public transport. Multiple services may be held at weekends with some not finishing until after 12pm.
- Informal care and social visits to vulnerable people by family and friends often takes place at weekends, and if the Proposed Changes lead to a reduction in these visits it may have impacts on feelings of loneliness and isolation for some older and/or disabled residents.
- The cost burden of the Congestion Charge falls on PHV drivers rather than operators. PHV drivers are disproportionately from BAME backgrounds.

There is anecdotal evidence that, because of the Congestion Charge, some PHV drivers are refusing fares into the CCZ or terminating trips outside the zone, leaving passengers to complete their journeys by other modes. This may increase as a result of the Proposed Changes.

A list of organisations that attended each stakeholder workshop is provided in the IIA Report.

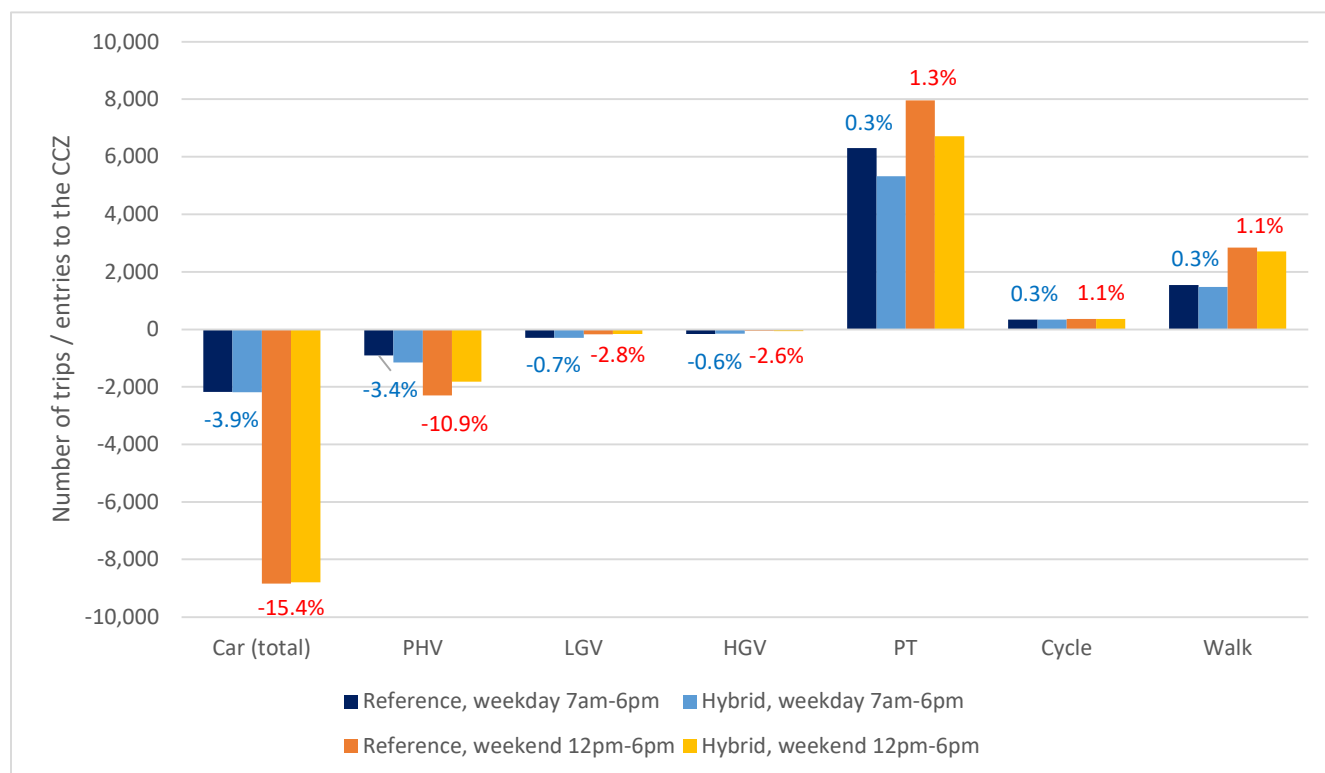
Forecast impact of the Proposed Changes on travel patterns

TfL has undertaken analysis, using their suite of strategic transport models and bespoke road user charging tool, to estimate the impact that the Proposed Changes will have on travel patterns. Transport modelling has been undertaken for 2021 and 2031 (for two forecasts – Reference Case and Hybrid) to understand the potential impact of the Proposed Changes over the next 10 years.

- The Reference Case forecasts follows a more traditional transport forecast and, whilst taking into account central macro-economic forecasts representing the impact of the pandemic, it does not assume any significant behavioural change
- The Hybrid forecast is an amalgamation of the five scenarios, based on a rolling review, to understand if features of the scenarios are more or less plausible as London recovers.

In percentage terms the change in trips under both forecasts are identical demonstrating that the Proposed Changes are equally impactful in a range of different potential future circumstances. The impact on the Reference Case and Hybrid Forecast is presented here. Figure 0-1 below shows the total impact on travel by mode, for personal or business trips.

Figure 0-1: Change in vehicle entries into the CCZ, by mode, 2031 Reference Case and Hybrid demand forecasts



The reduction in total car trips (business and other) is about 4 per cent on weekdays between 0700-1800, and about 3 per cent for PHVs over the same period. At the weekend the reduction in car trips is higher during the weekend charging hours (1200-1800) of 15 per cent and 11 per cent for PHVs.

The increase in the charge causes a reduction of less than 1 per cent in both LGV and HGV entries into the CCZ between 0700 and 1800. The introduction of a charge at weekends has a slightly larger impact, with a reduction

of approximately 3 per cent in both LGV and HGV trips between 1200 and 1800, however the absolute number of freight trips are much smaller at the weekend.

Summary of Impacts

A brief summary of each positive and negative impact and its overall rating is provided in Table 0-2 below, alongside existing and potential further mitigation or enhancement measures.

Table 0-2: Existing and potential mitigation and enhancement measures

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation / Enhancement
Environment				
Air Quality	Minor reduction (approximately 1.5%) in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within central London.	+1 Minor Positive	ULEZ, LEZ	N/A
Climate Change	Minor reduction (approximately 1.5%) in annual emissions of CO ₂ within central London.	+1 Minor Positive	ULEZ, LEZ	N/A
People				
Air Quality, Health and Health Inequalities	Reduction in pollutant emissions leading to positive health outcomes particularly for people living in the boroughs within the CCZ.	+1 Minor Positive	ULEZ, LEZ	N/A
Noise	Potential reduction in noise levels likely to be imperceptible.	0 Neutral	ULEZ, LEZ	N/A
Connectivity	Increase in active travel in central London.	+1 Minor Positive	Streetspace schemes, Low Traffic Neighbourhoods	Further targeted roll out of existing measures.
	Improvement in bus journey times and reliability.	+1 Minor Positive	N/A	N/A
	Potential increase in crowding on public transport.	-1 Minor Negative	N/A	N/A

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation / Enhancement
Access to health and social care and other social infrastructure	Impact upon access to health and social care services within the CCZ for people on low incomes travelling by motorised vehicle.	0 Neutral	Cheaper alternative modes of transport available.	N/A
	Increased cost of access to healthcare during weekend charging hours for older people and disabled people unable to use public transport or active travel.	0 Neutral	Blue Badge holders can nominate up to two vehicles per day to receive 100% discount Designated Accessible PHVs remain exempt. Disabled tax class vehicle exemption. NHS Patient reimbursement scheme.	Raise awareness of eligibility for extended NHS Patient Reimbursement Scheme through NHS Trusts.
	Impact upon pregnant women, accessing the CCZ who cannot use public transport or active travel for medical appointments.	0 Neutral	NHS Patient Reimbursement Scheme.	Clarify and communicate eligibility of pregnant women for NHS Patient Reimbursement Scheme through NHS Trusts.
	Increased cost of providing privately funded or voluntary care requiring access by private vehicle.	-1 Minor Negative	Residents discount (for those living in the CCZ) Blue Badge holders can nominate up to two vehicles per day to receive 100% discount	N/A
	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.	-1 Minor Negative	9+ seat minibus exemption Blue Badge discount Existing parking charge exemptions at weekends at certain places of worship	TfL encourage faith organisations to consider 'shuttle services' to provide access into the CCZ for religious services.
Accessibility	Increased costs for disabled drivers –	-1 Minor Negative	Designated wheelchair	TfL to raise awareness of discounts available.

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation / Enhancement
	particularly at weekends – who do not qualify for blue badge.		accessible PHVs and taxis remain exempt 2019 changes to Blue Badge eligibility for 'hidden' disabilities.	
Access to work and training	Financial impact for people in low income jobs in retail, hospitality and leisure who need to travel to work by private transport during weekend charging hours.	-1 Minor Negative	N/A	N/A
	Increased costs to PHV drivers unable to spread additional costs across multiple trips.	-1 Minor Negative	Cleaner vehicle discount (until December 2025). Designated Wheelchair Accessible PHVs remain exempt. Blue Badge holders can nominate two vehicles to receive 100% discount. Ability to pass on increased costs to passengers, in whole or in part.	N/A
	Impact for people that drive to weekend school/ adult education and education offered by faith groups within CCZ.	0 Neutral	School buses and minibuses of 9+ seats are exempt from the charges, which could be used to provide access into the CCZ for weekend school sports fixtures or other group activities.	N/A
Health and Health inequalities	Impact upon mental and physical health due to a reduction in traffic making the streets	+1 Minor Positive	TfL and borough initiatives to improve streetspace for	Further targeted roll out of active travel measures.

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation / Enhancement
	more attractive to socialise/walk/cycle on.		walking and cycling.	
Social Integration	Financial impact on charities delivering mobile services (or requiring transportation of goods/equipment) to vulnerable people during weekend charging hours.	-1 Minor Negative	N/A	Consider further reimbursement eligibility or exemption.
	Impact on community groups operating within the CCZ.	0 Neutral	Likely to be resident of CCZ and qualify for discount or be able to use active or sustainable travel modes.	N/A
Safety and Crime	No impacts related to surveillance of illegal driving and other antisocial behaviour as the Proposed Changes will not introduce measures of relevance.	0 Neutral	N/A	N/A
	Reduction in travel by individuals with a fear for their safety on public transport, walking or cycling.	-1 Minor Negative	CCTV coverage and patrolling of public transport by Metropolitan Police Service, British Transport Police and City of London Police. Mayor's Tackling Violence Against Women and Girls Strategy Targeted campaigns such as tackling hate crime on the public transport network.	Additional targeted campaigning and outreach be undertaken in relation to perceptions of safety on public transport for community groups.
	Improvements in road safety as a	+1 Minor Positive	Police enforcement and existing TfL campaigns and	N/A

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation / Enhancement
	result of a reduction in congestion.		communication strategies. Introduction of 20mph speed limits.	
Health and Health inequalities	Short-term impact upon people with underlying health conditions vulnerable to coronavirus travelling by public transport as they are not eligible for reimbursements.	-1 Minor Negative	Enhanced cleaning regime in stations and on public transport vehicles. Targeted campaigning to continue to be undertaken in relation to perceptions of safety on public transport in relation to coronavirus.	It is recommended that the temporary changes scheme criteria for NHS patients that are assessed as being at high or moderate risk from coronavirus is maintained.
Economy				
Employment	Neutral impacts overall, with potential for minor impacts for some sectors (retail, accommodation and food services and arts, entertainment and recreation).	Neutral	Placemaking, streetspace and active travel measures	Further enhancement of urban realm and provision for increase in active travel within central London from public transport hubs to destinations.
Business	Neutral impacts overall, with potential for both minor negative and positive impacts for some sectors (retail, accommodation and food services and arts, entertainment and recreation).	Neutral	Placemaking, streetspace and active travel measures	Further enhancement of urban realm and provision for increase in active travel within central London from public transport hubs to destinations.
London's Wider Economy	Wider supply chains will be affected by the Proposed Changes	Neutral		N/A

1 Introduction

1.1 Overview

This report provides the detailed findings of the Integrated Impact Assessment (IIA) of the Proposed Changes to the Congestion Charge. It also provides the background to, and a summary of, the Proposed Changes, and an explanation of the overall approach to the IIA.

1.2 Purpose of IIA

An IIA provides an integrated assessment of the potential positive and negative effects of a proposal or plan. It also identifies potential mitigation measures which could help mitigate any adverse impacts or enhance beneficial impacts. This IIA comprises the following assessments:

- Environmental Assessment (EA)¹
- Equalities Impact Assessment (EQIA)
- Health Impact Assessment (HIA)
- Economic and Business Impact Assessment (EBIA)

1.3 Structure of IIA Report

The remainder of this report is structured as follows:

Section 2 – summarises the background and sets out the Proposed Changes to the Congestion Charge which are the subject of this IIA

Section 3 – explains the overall approach taken to the assessment and the methodologies employed by the individual assessment components (health and equality, economic, and business and environment)

Section 4 – provides a summary of the forecast change in traffic as a result of the Proposed Changes

Section 5 – an assessment of impacts against environmental objectives

Section 6 – an assessment of health and equalities impacts

Section 7 – an assessment of impacts on business and the economy

Section 8 – summarises impacts identified alongside existing and potential further mitigation measures.

¹ The IIA of the changes to the CCZ will not be a statutory Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC.

2 Proposed Changes to the Congestion Charge

2.1 Policy Context

TfL's Proposed Changes to the Congestion Charging scheme sit within the context of the Mayor's strategic policies as set out in: Mayor's Transport Strategy (TfL, 2018); the London Plan (GLA, 2021), and the Mayor's London Environment Strategy (GLA, 2018).

The Mayor's Transport Strategy (MTS) has the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport (Policy One) and reducing overall traffic levels by 10-15 per cent by 2041 (Policy 5). The expected outcomes of the MTS include a 95 per cent mode share for walk/cycle/public transport for trips within Central London (up from 90 per cent in 2015) and a 99 per cent mode share for trips between central London and inner/outer London (compared with 95 per cent and 90 respectively in 2015) by 2041.

Proposal 20 of the MTS commits the Mayor (through TfL) to keep existing and planned road user charging schemes (including the Congestion Charge) under review to ensure they prove effective in furthering or delivering the policies and proposals of the MTS. By reducing traffic and congestion, road user charging schemes play a complementary role to the Healthy Streets Approach set out in the MTS. All revenue from the Congestion Charge helps to facilitate the transformation of the design and layout of street space through co-ordinated improvements to public transport and streets to create safe, secure, accessible, inclusive, well-designed gateways and routes to and from public transport. It also recognises the importance of the charge in supporting reliable bus journey times and efficient freight and servicing.

The MTS is key to the delivery of the London Plan and the Mayor's Environment Strategy. The London Plan is the Mayor's Greater London Authority Spatial Development Plan (SDS), which outlines an integrated economic, environmental, transport and social framework for the development of London over a 20-25 year period (2019-2041).

The Mayor's London Environment Strategy (LES) commits the Mayor to accelerating the attainment of legal limits for air quality in Greater London, including through the reduction of emissions from London's Transport Network by enabling Londoners to switch to more sustainable forms of travel. In 2019 the Mayor introduced the Ultra Low Emission Zone (ULEZ), the world's toughest vehicles emission standards, in central London. The ULEZ currently has the same boundary as the Congestion Charge Zone (CCZ) but operates 24 hours a day, seven days a week (except Christmas Day). The ULEZ boundary is due to extend to inner London from 25 October 2021.

The Congestion Charge remains an important tool available to help manage demand for road space in central London and thereby deliver the vision of the MTS. The MTS sets out that central London must remain very well connected, with world class public realm and safe air quality levels. It highlights the importance of bus services and that they are prioritised to ensure reliability. It is clear that, given the fundamental importance of efficient movement to the continuing success of such a limited geographical area, the future of central London must involve steady reduction in car use.

A review of relevant legislation and policy documents which inform the assessment is provided in Appendix A.

2.2 Background

Introduction to the Scheme

In February 2003, the then Mayor of London introduced the Congestion Charge at £5 a day with the aim of reducing traffic congestion in and around the charging zone and encouraging a shift from private vehicles to public transport within central London.

Following its introduction, the Congestion Charge was very effective in reducing traffic levels (by 15 per cent) and congestion (by 30 per cent) in the CCZ, and it remains an integral part of managing demand for road space in central London and delivering the aims of the MTS. However, the MTS highlighted that 15 years after the introduction of the Congestion Charge, the challenge facing central London had changed. It notes that traffic levels in central London were at the highest in the evening, and weekend levels were broadly similar to weekday levels. At the time of publication of the MTS in 2018, both evenings and weekends were outside of charging hours.

Previous Changes to the Scheme

The Congestion Charge has progressively increased since its introduction: to £8 per day from July 2005; to £10 from January 2011; and to £11.50 from June 2014.

While the Congestion Charge and other measures implemented by the Mayor to address congestion and poor air quality have seen the use of private cars in central London continue to decline, there was an increase in the number of private hire vehicles (PHVs) entering the CCZ (from 4,000 in 2003 to more than 18,000 by 2017). Growth in the number of licensed PHVs operating in the CCZ was a factor leading to increased congestion in the zone and in 2019, following consultation and impact assessment, the Mayor removed the PHV exemption for all vehicles except those designated as wheelchair accessible. This had the effect of reducing the number of unique PHVs entering the CCZ by up to 42 per cent (pre-pandemic).

Pre-Pandemic Scheme

By the beginning of 2020, the Congestion Charge imposed an £11.50 charge (£10.50 if using Auto Pay) on all motorised vehicles being driven within the CCZ from 7am to 6pm, Monday to Friday, unless they were exempt or registered for a discount (as set out in Table 2-1 and Table 2-2).

Table 2-1: Vehicles eligible for exemptions from Congestion Charge

Exemptions
<ul style="list-style-type: none"> ▪ Two wheeled motorbikes (and sidecars) and mopeds ▪ Emergency service vehicles² ▪ NHS vehicles that are exempt from vehicle tax ▪ Vehicles used by disabled people that are exempt from vehicle tax and have 'disabled' taxation class ▪ Vehicles for more than one disabled person (for example Dial-a-Ride) that are exempt from vehicle tax and have a 'disabled' taxation class ▪ Taxis and designated wheelchair accessible PHVs ▪ HM Coastguard and Port Authorities vehicles ▪ Certain borough [and TfL] operational vehicles ▪ Armed forces vehicles ▪ Royal Parks Agency and Crown Estate Paving Commission vehicles

² Which have a taxation class of 'ambulance' or 'fire engine' on the date of travel

Table 2-2: Vehicles eligible for discounts

Discounts
<ul style="list-style-type: none"> ▪ Residents' discount ▪ Blue Badge ▪ Accredited breakdown vehicles ▪ Vehicles with 9+ seats ▪ Cleaner vehicle discount³ ▪ Motor tricycles ▪ Roadside recovery vehicles

Table 2-3: Pre-pandemic reimbursement scheme

Reimbursement eligibility criteria
<p>A selective reimbursement scheme operated for qualifying National Health Service (NHS) staff and NHS patients, in accordance with the following criteria:</p> <ul style="list-style-type: none"> ▪ NHS staff reimbursement (by TfL) of journeys which are made by NHS staff providing services in respect to an emergency, or other extraordinary circumstances, including journeys to and from work where deemed eligible by the NHS Trust. ▪ NHS patient reimbursement arrangement covered patients that met the following criteria*: <ol style="list-style-type: none"> 1. A patient who: <ol style="list-style-type: none"> a. Has a compromised immune system; or b. Requires regular therapy or assessment; or c. Requires recurrent surgical intervention AND 2. The patient is clinically assessed as too ill, weak, or disabled to travel to an appointment on public transport.

*The same NHS Patient reimbursement scheme is in operation for the Ultra Low Emission Zone.

Temporary Changes

In June 2020, as part of the extraordinary funding and financing arrangement with the Department for Transport, TfL brought forward proposals to broaden the level and scope of the Congestion Charge. The operation of the Congestion Charge was changed on a temporary basis as an emergency response to the transport challenges created by the coronavirus pandemic. The changes are set out in Table 2-4:

³ From 25 October 2021, the cleaner vehicle discount will change so that only battery electric or hydrogen fuel cell vehicles are eligible. Then from 25 December 2025, the cleaner vehicle discount will be discontinued.

Table 2-4: Temporary changes to the Congestion Charge

Temporary Changes
<ul style="list-style-type: none"> ▪ Charging hours were extended from 7am-6pm to 7am-10pm ▪ Charging days were extended from 5 days a week (excluding bank holidays) to 7 days a week (including bank holidays with the exception of Christmas Day) ▪ The daily charge level increased from £11.50 to £15 ▪ The £1 Auto Pay discount and Fleet Auto Pay discount were removed ▪ The charge level for delayed payment was increased to £17.50 and the time available to make a delayed payment was extended from one day to 3 days ▪ The 90% residents' discount was closed to new applicants (from 1 August 2020) ▪ The NHS Staff and NHS patient reimbursement rules were amended to facilitate their expanded application (TfL reimbursed the Congestion Charge when it was paid by NHS staff in respect of their commutes and by patients who are most at risk if they contract Covid-19 when attending NHS appointments) ▪ A new reimbursement arrangement was included for care home workers working at care homes in the CCZ and for local authorities and charities providing certain services in response to the pandemic.

These changes were introduced as emergency measures in response to the transport challenges brought about by the pandemic. The objectives were to prevent streets in central London becoming unusably congested and to support the transformation of London's streets as part of Streetspace for London plan. The temporary changes are required to be kept under review regarding milestones in the pandemic and significant changes.

2.3 Description of Proposed Changes

A number of new Proposed Changes to the Congestion Charge are being proposed by TfL. They have been selected to promote the primary objective of reducing traffic and congestion in Central London, which should facilitate an increase in the mode share for walk/cycle/public transport and support other MTS policies and proposals. The Proposed Changes are set out in Table 2-5 alongside the Pre-Pandemic Scheme and the Temporary Changes introduced in June 2020 in response to the coronavirus pandemic.

This IIA is focused on the impact of the Proposed Changes compared with the Pre-Pandemic scheme. The Temporary Changes have, to date, been in operation during periods of lockdown and social restrictions and so the impact of the Proposed Changes for many people resuming their activities would be in comparison to equivalent features of the pre-pandemic scheme for example, a higher charge level and additional hours of operation. Where people have been driving in the CCZ during the period of Temporary Changes, they may experience reduced impacts for example, if they were driving in the CCZ after 6pm or on weekend mornings given that these periods would not be charged in future under the Proposed Changes. We consider the most appropriate assessment to be a comparison between the new proposals against the equivalent features of the pre pandemic scheme rather than comparing against temporary circumstances when many people would not have been travelling in the usual way. Therefore, the Temporary Changes are not themselves assessed, although relevant experience from their operation is referenced where it helps to inform the IIA.

Table 2-5: Comparison of Proposed Changes with Congestion Charge prior to June 2020 and Temporary Changes

Area	Pre-pandemic scheme up to 22 June 2020	Temporary Changes to the Congestion Charge from 22 June	Proposed changes to the Congestion Charge
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	Mon – Fri, 0700-1800	Mon – Sun, 0700-2200	Mon – Fri, 0700-1800; Sat, Sun & bank holiday, 1200-1800
Non- charging days	Bank holidays and the days between Christmas Day and New Year's Day	Christmas Day	Christmas Day to New Year's Day bank holiday (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
Reimbursements	NHS staff and patient reimbursement arrangements	NHS staff and patient reimbursement arrangements extended, and new reimbursement arrangements for care home workers working at care homes in the Congestion Charging Zone and charities and local authorities' workers/volunteers providing certain services.	Extended NHS staff reimbursement arrangement. Extended NHS patient reimbursement arrangement for patients vulnerable to risk of infection during the current and any future pandemic or epidemic prevalent in Greater London. Reimbursement arrangements for care home workers working at care homes in the Congestion Charging Zone and charities and local authorities' workers/volunteers providing certain services during the current and any future pandemic or epidemic prevalent in Greater London

*The discounts and exemptions remain unchanged from the pre-pandemic existing scheme

In comparison to the scheme in operation pre-pandemic, the Proposed Changes are:

- An increase in the daily charge of £3.50 to £15
- The introduction of a six-hour charging period (12pm – 6pm) on Saturday and Sunday
- The introduction of charging on bank holidays (except Christmas Day, Boxing Day and New Year's Day)
- The removal of charging from 25th December to New Year's Day Bank Holiday (inclusive)
- The removal of the £1 Auto Pay discount.

Weekday charging hours and eligibility for residents' discount will revert to those in place pre-pandemic. There are no proposals to change the vehicles eligible for discounts or exemptions.

TfL is seeking views on the reimbursement criteria that should apply under the Proposed Changes.

2.4 Alternatives Considered

TfL considered a range of possible changes to the Congestion Charge in order to meet the MTS objectives. A range of options were considered based on the level of charge, and the hours and days of operation. Table 2-6 below provides a summary of the alternatives that were considered.

Table 2-6: Alternatives considered for proposed changes to Congestion Charge

Parameter	Option	Taken forward / Rejected	Justification
Charging level	Increase charge to £13	Rejected	<ul style="list-style-type: none"> • Modelling analysis indicates that the charge would have a lesser impact on traffic in the CCZ, reducing car kms in the CCZ in pre-pandemic charging hours by around 1.5%
	Increase charge to £15	Taken forward	<ul style="list-style-type: none"> • Modelling indicates a £15 charge would be expected to reduce car kms in the CCZ in pre-pandemic charging hours by around 4%
Weekday Charging hours	Extend charging hours in the evening	Rejected	<ul style="list-style-type: none"> • Not being taken forward while future weekday travel patterns remain uncertain and due to potential impacts on the recovery of the evening economy
	End charging at 6pm	Taken forward	<ul style="list-style-type: none"> • In combination with a £15 charge level, there is a traffic reduction in pre-pandemic charging hours. The profile of traffic in the evening will be kept under review
Weekend charging hours	Charging hours 12 noon – 6pm	Taken forward	<ul style="list-style-type: none"> • Traffic levels at weekends are similar to weekdays, with car and PHV traffic even higher than on an average weekday, pre-pandemic, causing delay to essential traffic including buses and freight. • Highest levels of traffic seen on weekends from midday. • In combination with a £15 charge, there is a reduction in car traffic of around 15%

	Extend charging hours beyond 12 noon – 6pm	Rejected	<ul style="list-style-type: none"> Although entries to the zone have been higher on Saturday and Sunday compared to an average weekday, overall traffic levels are lower on weekend mornings. Longer charging hours at the weekend, given the different activity profile compared to weekdays, may adversely impact some individuals
Charging days	Charge weekends	Taken forward	<ul style="list-style-type: none"> Traffic levels at weekends are similar to weekdays, with car and PHV traffic having been even higher than on an average weekday, pre-pandemic Extends the benefits of reduced traffic and congestion (including freeing up road space for sustainable modes and essential traffic, as well as emissions reductions) to weekends, when more people are travelling for leisure
	Charge bank holidays	Taken forward	<ul style="list-style-type: none"> Car and PHV traffic were higher on bank holidays than on an average weekday pre-pandemic Extends the benefits of reduced traffic and congestion to bank holidays when there are likely to be higher proportions of visitors and leisure trips
	Charge-free weekends	Rejected	<ul style="list-style-type: none"> Traffic levels at weekends are very similar to weekdays, with car and PHV traffic even higher than on an average weekday pre-pandemic, causing delay to essential traffic including buses and freight
	Charge-free period from Christmas Day to New Year's Day Bank Holiday inclusive	Taken forward	<ul style="list-style-type: none"> Fewer alternative travel options on Christmas day Changes to travel patterns throughout period, for example through the closure of some businesses throughout the period, reducing traffic and the impact of journeys for those who are travelling on those days
Discounts, charges and exemptions	Maintain residents 90% discount	Taken forward	<ul style="list-style-type: none"> Residents receive a 90% discount in recognition of the fact they are unable to avoid the charge if they need to drive Removing the discount would have greater impacts for residents whose opportunity to avoid the charge would be even more constrained by the proposed higher charge level and introduction of weekend charging
	Remove residents' discount	Rejected	<ul style="list-style-type: none"> At this time, it remains appropriate to provide a reduced level of charge for residents who may have less option to avoid the charge

	Reduce residents' discount	Rejected	<ul style="list-style-type: none"> The higher charge level and extension of charging hours to weekends may further influence some residents' mode choice. The impact of the new proposals, if confirmed, on residents' car trips would be kept under review
	Longer-time period to pay 'next day' following travel into the CCZ	Taken forward	<ul style="list-style-type: none"> To provide drivers with more time to pay the charge (at a higher rate than the ordinary charging level) before being issued with a PCN
	Increase charge level for 'next day' payment to £17.50	Taken forward	<ul style="list-style-type: none"> Increase to charge required to continue incentive to pay in advance of travel into the CCZ. The £2.50 price differential between the ordinary charging level and deferred charge is retained
	Remove Auto Pay and Fleet Auto Pay discount	Taken forward	<ul style="list-style-type: none"> The rationale for introducing Auto Pay discounts was to encourage people to switch to paying by account. As the majority of people now pay by Auto Pay, this incentive is no longer required Removing the discount reinforces that access to road space in central London should not be discounted for those who are liable to pay the full charge An incentive remains to continue using Auto Pay as it reduces the risk of having to pay a higher charge in the days following travel in the zone or incurring a PCN for non-payment
	Introduce wider reimbursements or make changes to existing reimbursement schemes	Taken forward	<ul style="list-style-type: none"> The extension of the NHS staff reimbursement is proposed to be retained The other reimbursement arrangements introduced as part of the temporary changes will be retained and extended to ensure they can be used in future pandemic and epidemics in Greater London, recognising the positive impacts this has had for those in response roles and vulnerable people they support

3 Approach to the IIA

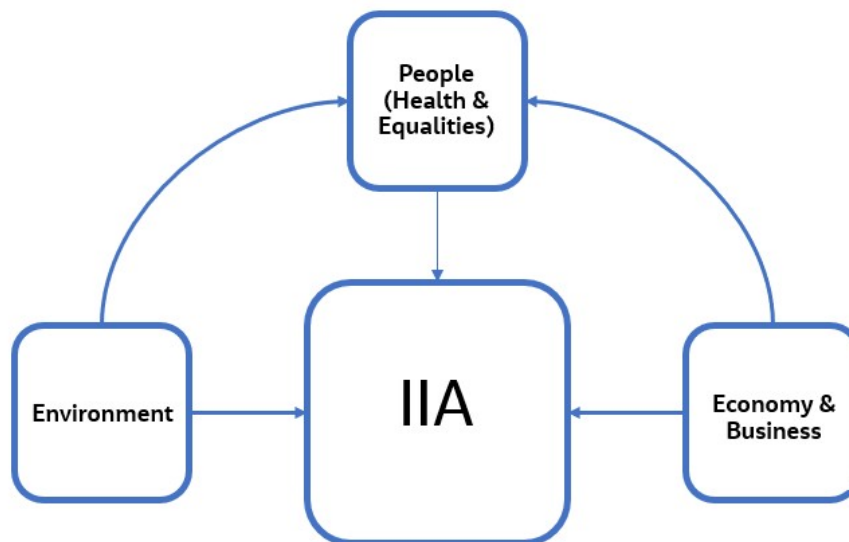
3.1 Overview of the IIA Process

The IIA process is a tool for identifying key impacts associated with the Proposed Changes to the Congestion Charge, including how negative impacts could be avoided or mitigated where possible, and how positive impacts could be enhanced. This IIA report brings together the findings of each of these assessments into one integrated document, where they are reported under three themes to be consistent with the structure of the Mayor's Transport Strategy IIA:

- London's Environment (incorporating the Environmental Assessment)
- London's People (incorporating the Health Impact Assessment and the Equality Impact Assessment)
- London's Economy (incorporating the Economic and Business Impact Assessment).

A single assessment framework has been employed to allow all potential impacts arising from the Proposed Changes to be assessed together, rather than individually.

Figure 3-1: The relationship between the different IIA assessment topics



3.2 IIA Assessment Framework

The IIA framework is objective led, with the starting point for the assessment being the IIA framework developed for the MTS (2018). Assessment objectives and reporting is grouped under three themes – people, economy, environment – as employed in the assessment of temporary changes to the CCZ (June 2020) and the IIA for the ULEZ Further Proposals (2017). Appendix H provides the full list of IIA objectives, and associated topics, and identifies which are relevant (scoped in) to this assessment and why.

Table 3-1: IIA themes and topics

Theme	London's People	London's Economy	London's Environment
Topics	Health and Health Inequalities Accessibility Projected Characteristics (Equality and inclusion) Safety and Crime Social Integration Design Connectivity Noise	Employment Business London's Wider Economy	Nitrogen dioxide Particulate matter (PM ₁₀ and PM _{2.5}) Carbon dioxide

Each of the theme-focused assessments have been undertaken to an agreed temporal and geographical scope; these are outlined in the subsections that follow. The existing (baseline) conditions across the relevant IIA themes are also presented, drawing on a wide range of research and datasets.

Overall impacts have been determined against two assessment parameters: scale and sensitivity. These consist of:

- **Scale:** the extent to which London's environment, people, and economy would be impacted (positively or negatively) by the proposals considering the numbers/proportion that would experience the impact within the area of assessment. Where quantitative data is not available this is based on judgement.
- **Sensitivity:** this considers how those impacted might respond; whether they are able to absorb or adapt to the Proposed Changes where negatively impacted. If the impacted group has no alternatives and, as such, will be greatly impacted by the proposal, then it is considered to be highly sensitive to the change. Where they are able to continue to function as normal, sensitivity would be low.

The application of these assessment parameters to the individual assessments is explained in Appendix B.

The discounts, exemptions and reimbursement arrangements which form part of the pre-pandemic scheme are taken into consideration (as existing mitigation measures) in determining the overall impact rating.

Table 3-2: Impact rating matrix

	Scale of Impact				
		No Change	Low	Medium	High
Sensitivity of Group	High	Neutral	Minor or moderate	Moderate or major	Major
	Medium	Neutral	Minor	Moderate	Moderate or major
	Low	Neutral	Neutral or minor	Minor or moderate	Minor or moderate

The overall impact is expressed on a rating from -3 to +3 (as shown on Table 3-3) in accordance with the IIAs for previous proposed changes to the CCZ in 2018 and temporary changes made in 2020. Duration of impact is reported separately. Where negative impacts are assessed, potential further mitigation measures are identified for consideration by TfL.

Table 3-3: Scale of rating of impacts

Scale of Overall Impact	Rating
+3	Major positive
+2	Moderate positive
+1	Minor positive
0	Neutral
-1	Minor negative
-2	Moderate negative
-3	Major negative

Temporal Scope

The earliest TfL could introduce the Proposed Changes to the CCZ would be late 2021 to early 2022, subject to public consultation and Mayoral approval. Some changes would be possible in December, others would involve changes to signage and technology systems so would need until February the following year. The assessment has a temporal scope of 10 years (to 2031). In line with the MTS, it is anticipated that TfL will keep the operation of

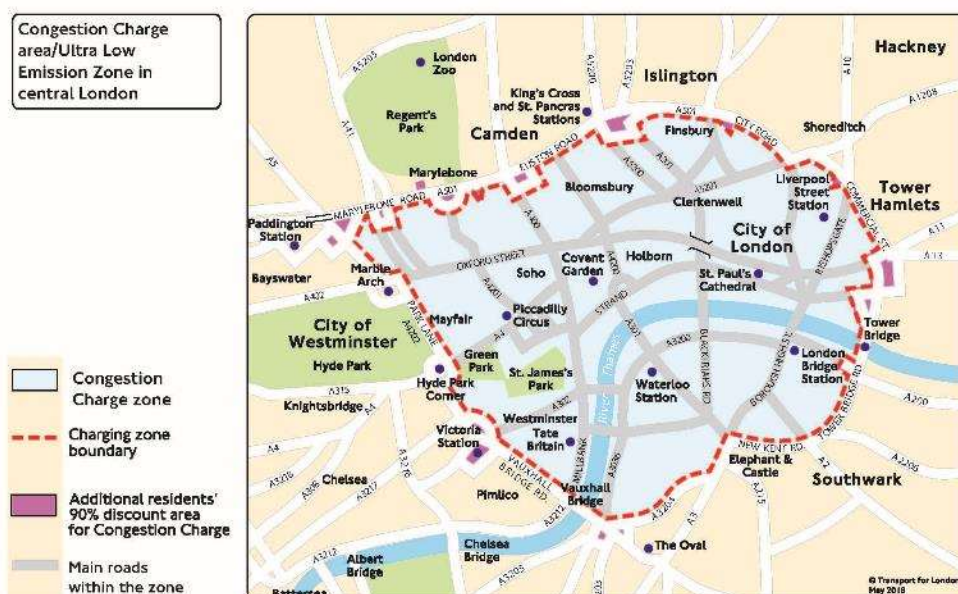
the CCZ under regular review and further changes may be proposed within this timeframe which would require further assessment.

All impacts have been assessed in terms of their likely duration and reported as either short-term (0-2 years), medium-term (3-5 years) or long-term (6-10 years).

Geographical Scope

The geographical scope of the assessment is Central London, except where specified within the individual assessment methodologies in Appendix B. The spatial scale at which impacts will be reported will be dependent upon the spatial resolution of relevant data sets, notably traffic data (observed and modelled) and emissions modelling. The CCZ (as shown on Figure 3-2) covers all or some of the City of London and the City of Westminster, and the London Boroughs of Camden, Lambeth, Southwark, Hackney, Islington and Tower Hamlets. The assessments will report impacts, where relevant, for the CCZ, and Greater London. A comparison of the boundaries is shown on Figure 3-3. Further details for each of the specific assessments are provided in Appendix B.

Figure 3-2: Congestion Charge area and current Ultra Low Emission Zone in central London⁴



Cumulative Impacts

The IIA has considered the potential for cumulative impacts on the environmental, economic or population receptors arising from the combined impact of a number of other road charging schemes within Greater London, in combination with the changes to the CCZ (inter-project cumulative effects).

⁴ From 25 October 2021, the ULEZ will expand to include to create a single larger zone bounded by the North Circular Road (A406) and South Circular Road (A205)

It was agreed with TfL that the projects taken into account in the cumulative assessment should comprise other road user charging schemes in operation, or which have had formal approval to proceed. These are:

1. The Ultra Low Emission Zone (ULEZ) – currently operational across central London (same boundary as CCZ) 24 hours a day every day (except Christmas Day), but due to be expanded to create a single larger zone bounded by the North Circular Road (A406) and South Circular Road (A205) from 25 October 2021 – requires vehicles which do not meet the specified emissions standards to pay a daily charge to enter the zone
2. The Low Emission Zone (LEZ) – operational across most of Greater London, 24 hours a day, every day of the year. Heavy diesel vehicles that do not meet the specified emissions standards are required to pay a daily charge to drive within the zone
3. Silvertown/Blackwall tunnel charging – construction work started on the Silvertown Tunnel in March 2021 with the tunnel expected to open in 2025. Once open, drivers will have to pay a charge for using either the Blackwall or Silvertown Tunnel. The exact level of charge is yet to be determined. Both tunnels fall within the LEZ and expanded ULEZ.

The scoping of this assessment concluded that there were unlikely to be any cumulative effects associated with the interaction of these schemes for the reasons given below.

Drivers of vehicles driving within the CCZ which do not meet the specified emissions standards already pay the ULEZ charge. Therefore, the expansion of the ULEZ has no impact on vehicles that already travel within or into the CCZ.

The Low Emission Zone similarly forms part of the baseline for the assessment as all of the most polluting lorry bus and coach vehicles travelling in the CCZ are subject to this charge. Coaches and buses are both exempt from the Congestion Charge. Only the small minority of heavy goods vehicles which do not comply with the LEZ emissions standards are subject to both the LEZ and the Congestion Charge. Due to the time restrictions placed on HGV entries into the CCZ by the London Lorry Control Scheme, under the Proposed Changes there would only be one additional hour per week (12-1 pm on a Saturday) when vehicles required to pay the LEZ would also incur the Congestion Charge). It is considered that most HGV operators would be able to adjust their schedule to avoid travelling through the CCZ at this time⁵.

The Silvertown Tunnel will be located 5km east of the CCZ and provides north/south connectivity across the Thames. Approaching the CCZ from the southeast, travel via the Silvertown tunnel would be a diversion from the primary A2 route, similarly travelling from the northeast, travel via the Silvertown Tunnel would be a diversion from the primary A13 route. Neither route via the Silvertown Tunnel would provide an advantage in terms of distance or travel time, so would be unlikely to be chosen. The primary routes for traffic wishing to travel from south east London to north west London (or vice versa) to a destination outside of the CCZ do not cross through the CCZ: instead traveling along its edge via the A4202, Vauxhall Bridge and then the A202 and A2, or via the A501, A13, Silvertown Tunnel, A102 and A2. Neither of these route choices would be impacted by the proposed change to the CCZ.

⁵ Under the London Lorry Control Scheme⁵ (LCS) vehicles over 18 tonnes may not enter the CCZ between 9pm and 7am Monday to Friday (including Friday night) and from 1pm Saturday to 7am Monday morning.

3.3 Stakeholder Engagement

A series of thematic stakeholder workshops were held to discuss the emerging findings of this IIA and to explore potential mitigation measures, including amendments to the reimbursement schemes. Three workshops - Business and Economy; Environment and Health; and Equality - were held in July 2021. In addition, a separate discussion was held with members of TfL's Independent Disability Advisory Group (IDAG).

All workshops were held online using Microsoft Teams. A full list of organisations that attended and a summary of the key points raised are included in Appendix G.

Jacobs worked with TfL to inform the selection of stakeholders to be invited to the workshops.

3.4 Traffic Forecasts Employed to Assess Impacts

Future Scenarios and Forecasts

The impacts of the coronavirus pandemic on patterns of travel and the economy are unprecedented, resulting in significant uncertainty in how they will affect the Capital in the longer term. There is a need to look at how the current crisis might impact the economy and further stimulate travel behaviour change. In response to this, TfL undertook a scenario planning exercise to help inform future decision making. This exercise produced five plausible scenarios for the implications of the coronavirus pandemic on travel demand. They consider:










- How quickly the public health crisis dissipates, and the speed and nature of economic recovery
- How working, shopping and leisure practices might change in the medium to longer term
- Changes to London's place in the world, and impacts on population, employment and demographics.

All are plausible and, in some cases, would significantly change the London transport market. They consider a 2030 timeframe. It is important to note that these scenarios have been designed to be independent of TfL intervention, they were created using the factors above and do not include any policy or infrastructure planning that TfL may consider. Therefore, they are reflections of behavioural and economic trends that may arise only as a result of recent events. To enable detailed assessment to be undertaken, TfL has constructed two fully modelled, multi-year forecasts - the Hybrid and Reference Case forecasts - which provide two points of reference within the range of uncertainty:

- The Reference Case forecasts follows a more traditional transport forecast and, whilst taking into account central macro-economic forecasts representing the impact of the pandemic, it does not assume any significant behavioural change
- The Hybrid forecast is an amalgamation of the five scenarios, based on a rolling review, to understand if features of the scenarios are more or less plausible as London recovers.

The assumptions underpinning these two forecasts are summarised in Figure 3-3. Modelling work to inform the IIA has looked at two future periods using these two forecasts. A point where post- pandemic traffic levels are assumed to have stabilised (late 2021 / 2022) and 2031. Traffic modelling will compare the situation with and without the proposed changes. The models have a base year of 2016.

Figure 3-3: Comparison of assumptions informing Reference Case and Hybrid Forecasts

Inputs	Ref case		Hybrid	
Population 2030		10 million in line with London Plan projections	 Slower growth to 9.7 million in line with more recent 4 year trend	
Employment	↑	London's economic growth continues throughout the 2020s	Decrease in blue collar employment rates in Central London, and slower economic growth overall through the 2020s means lower levels of employment than reference case 	↓
Working from home	—	No change in the levels of home working 	Much more working from home in office jobs, for those on higher incomes and for offices located in Central London leaving overall commuting trip rates at 90% of 2018 levels	↑ ↑
Propensity to use sustainable modes	↑	Attitudes towards public transport modes are unaffected. There is a small increase in willingness to cycle 	Attitudes to Public Transport change for some following a prolonged period of restrictions but the majority are willing to return. Many who enjoyed cycling during lockdown make a permanent change 	↑
Car ownership	↓	Car ownership falls as population growth encourages use of sustainable modes, together with London Plan policy of reduced parking supply and increased parking charges	Car ownership remains steady even as population grows, reversing a long held trend, as people desire many transport options 	—
Shopping	↑	Large shopping centres remain attractive, and the proportion of retail floorspace grows. All shopping trips increase 	Larger shopping centres are not as attractive as they once were, as consumers show a greater shift to online and a slight shift towards local shopping. Local shopping trips increase.	↑
Leisure	↑	Leisure trips increase with population growth, and spatial distribution of leisure remains consistent with pre-Covid 	Greater flexibility means more discretionary trips, an 8% increase during the working day. However, there is a decrease in these trips that do not start from home. There are more shorter, local trips than trips to Central London 	↑

4 Forecast Impacts of Proposed Changes on Travel Patterns

4.1 Introduction

To understand the potential impact that the Proposed Changes will have on travel patterns, TfL has undertaken analysis 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, as described in Section 3.4. This section of the report summarises the key outputs from this analysis to provide a basis for the subsequent impact assessments. In both the Reference Case and Hybrid forecasts, overall traffic in the CCZ is forecast to increase. TfL's current forecasts indicate that the last 10 to 15 years of traffic reduction could be lost by 2030 without intervention.

4.2 Private Motor Vehicles

Table 4-1 shows the number of highway trips by private motorised vehicles into the CCZ in 2031 under the pre-pandemic Congestion Charging scheme and the forecast impact of the Proposed Charges on the number of trips. (Taxis and coaches are not included in the forecasts as neither are subject to the Congestion Charge).

Table 4-1: Impact of Proposed Changes on private motor vehicle entries into CCZ, 2031

	Time Period	Car (business)	Car (other)	PHV	LGV	HGV
2031 with pre-pandemic scheme	7am-6pm, weekdays	12,100 to 14,400	42,000 to 44,600	26,700 to 33,800	44,600 to 45,700	10,300 to 11,200
	12-6pm, weekends	12,200 to 14,600	42,500 to 45,200	16,600 to 21,100	5,900 to 6,100	1,000
Impact of Proposed Change (% Change)	7am-6pm, weekdays	-0.9%	-5.4%	-3.4%	-0.7%	-0.6%
	12-6pm, weekends	-3.8%	-23.1%	-10.9%	-2.8%	-2.6%

The trip forecasts for each vehicle type reflect a range of possible futures for London (represented by the scenarios), depending on the speed and nature of recovery from the current coronavirus pandemic. Although the absolute level of demand varies between the different forecast scenarios, the Proposed Changes are equally effective in both scenarios. Consequently, in percentage terms, the reduction in trips remains constant across both sets of forecasts.

Over a 24-hour period the impact during the week is smaller in percentage terms, with an aggregate reduction of 1.5 per cent compared to an aggregate reduction of 2.3 per cent in the charging hours. The impact of the Proposed Changes is more pronounced at the weekend, with an aggregate 24-hour reduction of 4.8 per cent compared to a 13.2 per cent reduction in the charging hours.

Non-freight Trips (Car and PHV)

For non-freight entries into the CCZ, the Proposed Changes result in a reduction in car and PHV trips entering the CCZ across the day (24 hours). Based on the data in Table 4-1, the reduction in total car trips (business and

other) is about 4 per cent on weekdays between 0700-1800, and about 3 per cent for PHVs over the same period. At the weekend the reduction in car trips is higher at approximately 8 per cent over 24 hours, with the impact concentrated from 1200-1800 when the forecast reduction is 15 per cent. For PHVs the impact at weekends is a reduction of 11 per cent 1200-1800, and 3 per cent over 24 hours.

Freight Trips (LGV and HGV)

The forecast impact of the Proposed Changes on the number of freight trips in the CCZ is small, resulting in a reduction of less than 1 per cent in both LGV and HGV entries into the CCZ between 0700 and 1800, with a similar impact experienced over the 24-hour period. The introduction of a charge at weekends has a slightly larger impact, with a reduction of approximately 3 per cent in both LGV and HGV trips between 1200 and 1800. Over a 24-hour period at the weekend the overall reduction is approximately 1 per cent.

4.3 Public Transport and Active Modes

Table 4-2 shows the estimated number of public transport, walking and cycling trips into the CCZ in 2031, with the pre-pandemic scheme and with the Proposed Changes. As with the private motor vehicle trips, the range of pre-pandemic scheme forecasts reflects a range of possible futures for London, depending on the speed and nature of recovery from the coronavirus pandemic. Although the absolute level of demand varies between the different forecast scenarios, the Proposed Changes are equally effective under both scenarios

Modelling undertaken for public transport, walk and cycle is conducted at a weekday 24-hour level. To estimate the impact at weekends, the difference in impacts on car trips has been applied to public transport and active modes (i.e. assuming the same proportions of mode shift on the weekends as seen on weekdays). This offers a way to approximate the impacts in those time periods but may not capture the full effect including any potential knock on impacts and therefore the percentage increase in public transport and active mode use could be higher than this forecast suggests.

Table 4-2 Impact of Proposed Changes on active mode and public transport entries into CCZ 2031

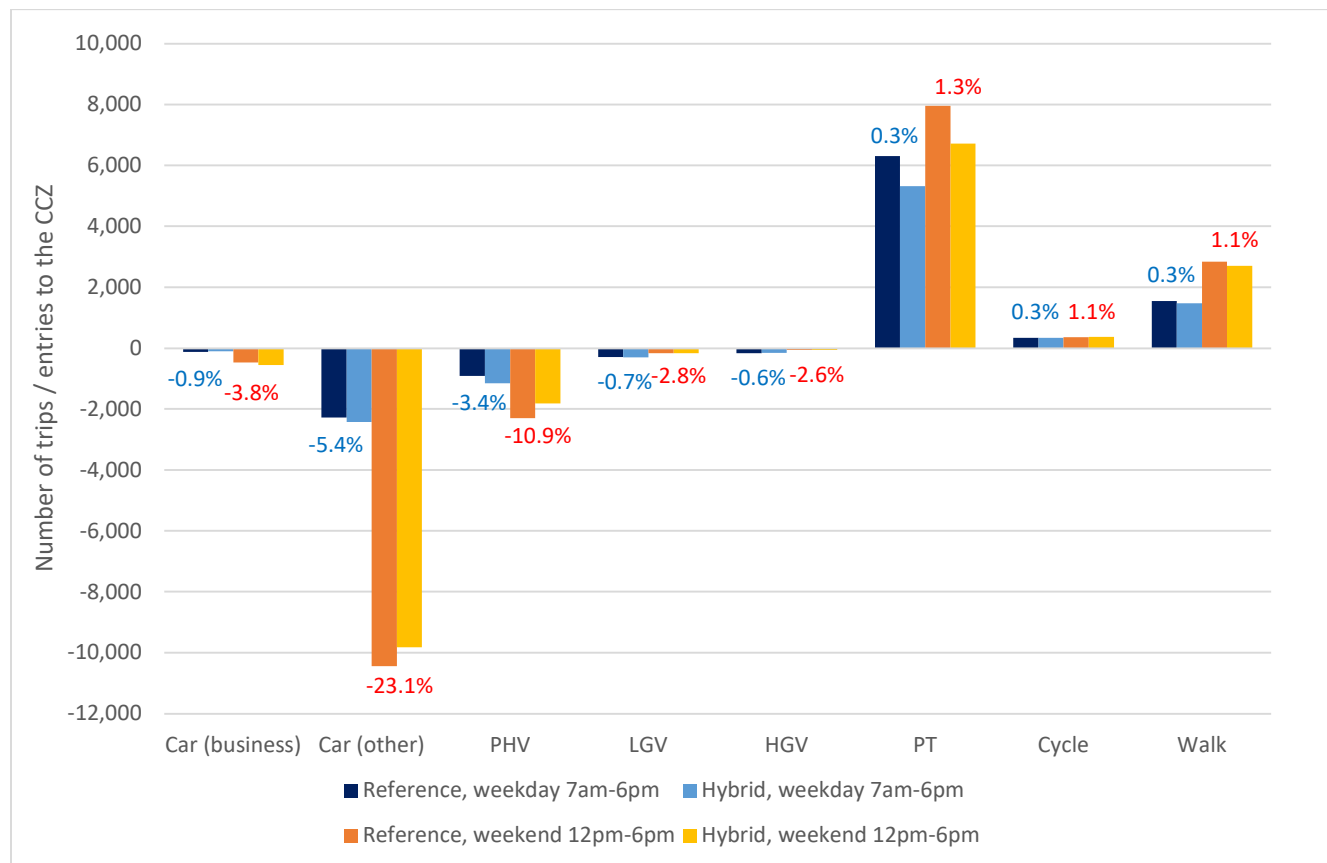
	Time Period	Public Transport	Cycle	Walk
2031 trips with pre-pandemic scheme	7am-6pm, weekdays	1,969,300 to 1,661,400	119,800 to 119,000	512,100 to 538,000
	12-6pm, weekends	527,600 to 625,300	32,200 to 32,600	237,300 to 249,300
Impact of Proposed Change (% Change)	7am-6pm, weekdays	0.3%	0.3%	0.3%
	12-6pm, weekends	1.3%	1.1%	1.1%

It can be seen that there is an increase in trips by all three modes in 2031 as a result of the Proposed Changes. The largest increases (over one percent) are forecast to occur during the weekend charging hours, with a smaller increase (0.3 percent) for all modes during weekday charging hours.

4.4 Summary

Figure 4-1 shows the total impact on travel by mode. Negative denotes a reduction in travel with the Proposed Changes, whereas positive shows an increase in travel.

Figure 4-1: Change in vehicle entries into the CCZ, by mode, 2031 Reference Case and Hybrid demand forecasts



With the Proposed Changes, the aggregate impact on total non-freight trips during the week (0700-1800) and weekend (1200 – 1800) across all modes of transport shown is likely to be marginal, with the reduction in car and PHV trips expected to largely be offset by an increase in public transport and active mode trips. Other exempt modes such as taxis, coaches and motorcycles may also see a small increase in trip numbers but were not included in the assessment. Therefore, the impact of the Proposed Changes is likely to be small in terms of the forecast non-freight trips into the CCZ, but (in line with the MTS) it encourages a shift away from unsustainable modes to public transport and active travel choices.

The increase in the charge causes a reduction of less than 1 per cent in both LGV and HGV entries into the CCZ between 0700 and 1800. The introduction of a charge at weekends has a slightly larger impact on freight trips, with a reduction of approximately 3 per cent in both LGV and HGV trips between 1200 and 1800.

5 Environment

5.1 Introduction

This section considers how the Proposed Changes are likely to perform against the two objectives relevant to the environment, namely:

- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.

As such, the assessment of the potential impacts of the Proposed Changes on the environment has focussed on changes in emissions of key road traffic derived air pollutants and greenhouse gases (GHGs), specifically:

- Oxides of nitrogen (NO_x)
- Particulate matter less than 10µm in diameter (PM₁₀)
- Particulate matter less than 2.5µm in diameter (PM_{2.5})
- Carbon dioxide (CO₂).

Estimated changes in emissions of NO_x, PM₁₀ and PM_{2.5} and CO₂ as a result of the Proposed Changes are presented and discussed in sections 5.3 and 5.4 respectively, whilst the methodology used to derive these estimates is summarised in Appendix B. Baseline conditions are described in Appendix C.

Emissions of air pollutants and CO₂ have not been estimated outside of central London, as the Proposed Changes are expected to have a relatively minor impact on traffic flows and therefore emissions outside of the CCZ. Likewise, the assessment has focussed on road traffic emissions, as emissions from other sources would not be affected by the Proposed Changes. TfL bus, taxi, motorcycles, coaches and specialist vehicle emissions have also not been estimated as they are exempt from the Congestion Charge and therefore considered unlikely to be substantially affected by the Proposed Changes.

5.2 Assessment Criteria

The impact of the Proposed Changes on emissions of air pollutants and CO₂ has been assessed by comparing estimated emissions 'with the Proposed Changes' with those 'without the Proposed Changes', for the relevant assessment year / scenario. In the absence of relevant guidance, the following criteria have been used to describe the magnitude of relative changes in estimated emissions within this assessment:

- < 1 per cent = Negligible
- 1 – 5 per cent = Minor
- 5 – 10 per cent = Moderate
- >10 per cent = Major.

5.3 Objective: Reduce Emissions of Harmful Pollutants

Oxides of Nitrogen (NO_x)

Estimated changes in car, PHV, LGV and HGV NO_x emissions within central London with the Proposed Changes are summarised in Table 5-1, with a more detailed breakdown provided in Appendix D. These data indicate that:

- Annual NOx emissions associated with these vehicle types are estimated to decrease by 1.6 per cent to 1.7 per cent in 2021⁶ and 1.4 per cent to 1.5 per cent in 2031 as a result of the Proposed Changes
- Greater absolute reductions in NOx emissions are estimated to occur in 2021 than in 2031, as vehicle exhaust emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in NOx emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.0 per cent to 5.2 per cent) The majority of the reductions in NOx emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

Table 5-1: Estimated changes in car, PHV, LGV and HGV NOx emissions within central London with Proposed Changes

Time Period	2021 ⁶ Reference Case		2021 ⁶ Hybrid		2031 Reference Case		2031 Hybrid	
	kg/yr	%	kg/yr	%	kg/yr	%	kg/yr	%
Annual	-2,930	-1.6%	-3,180	-1.7%	-1,350	-1.4%	-1,420	-1.5%
Weekday, 7am-6pm	-1,340	-1.5%	-1,400	-1.5%	-620	-1.3%	-650	-1.3%
Weekend, 12pm-6pm	-1,590	-5.1%	-1,790	-5.2%	-730	-5.0%	-760	-5.0%
Note: Values presented in kg/yr in table above are rounded to the nearest 10kg, whereas the percentages presented are exact.								

Particulates (PM₁₀ and PM_{2.5})

Estimated changes in car, PHV, LGV and HGV exhaust and non-exhaust⁷ PM₁₀ emissions within central London with the Proposed Changes are shown in Table 5-2, with a more detailed breakdown provided in Appendix D. These data indicate that:

- Annual PM₁₀ emissions associated with these vehicle types are estimated to decrease by 1.7 per cent to 1.8 per cent in 2021 and 1.6 per cent in 2031 as a result of the Proposed Changes
- Greater absolute reductions in PM₁₀ emissions are estimated to occur in 2021 than in 2031, as vehicle exhaust emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in PM₁₀ emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.2 per cent to 5.5 per cent)
- The majority of the reductions in PM₁₀ emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

⁶ Whilst traffic and emissions modelling were undertaken for the year 2021 (and not the expected first full calendar year of implementation, 2022), the results from the modelling undertaken for 2021 are considered representative of those for 2022.

⁷ Emissions occur not only as a result of exhaust emissions but also as a result of road surface, brake and tyre abrasion (termed 'non-exhaust' emissions).

Table 5-2: Estimated changes in car, PHV, LGV and HGV PM10 emissions within central London with Proposed Changes

Time Period	2021 ⁶ Reference Case		2021 ⁶ Hybrid		2031 Reference Case		2031 Hybrid	
	kg/yr	%	kg/yr	%	kg/yr	%	kg/yr	%
Annual	-570	-1.7%	-625	-1.8%	-470	-1.6%	-505	-1.6%
Weekday, 7am-6pm	-250	-1.7%	-260	-1.7%	-215	-1.6%	-225	-1.6%
Weekend, 12pm-6pm	-320	-5.5%	-360	-5.5%	-255	-5.2%	-275	-5.3%
Note: Values presented in kg/yr in table above are rounded to the nearest 10kg, whereas the percentages presented are exact.								

Estimated changes in Car, PHV, LGV and HGV exhaust and non-exhaust⁷ PM_{2.5} emissions within central London with the Proposed Changes are shown in Table 5-3, with a more detailed breakdown provided in Appendix D. These data indicate that:

- Annual PM_{2.5} emissions associated with these vehicle types are estimated to decrease by 1.7 per cent to 1.9 per cent in 2021⁶ and 1.6 per cent to 1.7 per cent in 2031 as a result of the Proposed Changes
- Greater absolute reductions in PM_{2.5} emissions are estimated to occur in 2021 than in 2031, as vehicle exhaust emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in PM_{2.5} emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.1 per cent to 5.4 per cent)
- The majority of the reductions in PM_{2.5} emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

Table 5-3: Estimated changes in car, PHV, LGV and HGV PM2.5 emissions within central London with Proposed Changes

Time Period	2021 ⁶ Reference Case		2021 ⁶ Hybrid		2031 Reference Case		2031 Hybrid	
	kg/yr	%	kg/yr	%	kg/yr	%	kg/yr	%
Annual	-285	-1.7%	-320	-1.9%	-235	-1.6%	-260	-1.7%
Weekday, 7am-6pm	-125	-1.7%	-130	-1.7%	-105	-1.6%	-115	-1.7%
Weekend, 12pm-6pm	-155	-5.4%	-180	-5.4%	-125	-5.1%	-140	-5.3%
Note: Values presented in kg/yr in table above are rounded to the nearest 10kg, whereas the percentages presented are exact.								

Overall Impact

The Proposed Changes are estimated to result in a minor reduction in annual emissions of car, PHV, LGV and HGV derived air pollutants in central London and are therefore expected to have a **minor positive** impact on annual mean air pollutant concentrations. The Proposed Changes are estimated to result in a larger reduction in emissions between 12pm-6pm on weekends and are therefore expected to have a **moderate positive** impact on short-term air pollutant concentrations during this period. In order to put these changes in emissions into context, total estimated reductions in car, PHV, LGV and HGV NO_x and PM_{2.5} emissions within central London between 2021⁷ and 2031 (including interim years), with the Proposed Changes, are shown in Table 5-4, along with the corresponding estimated monetary benefit attributable to these changes derived using Defra's Air Quality Appraisal: Damage Costs Toolkit⁸.

Table 5-4: Estimated changes in NO_x and PM_{2.5} emissions within central London and associated monetary benefits

	Minimum	Maximum
Total reduction in NO _x emissions between 2021 and 2031 (tonnes)	24.2	26.0
Total reduction in PM _{2.5} emissions between 2021 and 2031 (tonnes)	2.9	3.2
Monetary Benefit (Central Present Value)	£2,621,293	£2,871,487
<p>Notes:</p> <p>Monetary benefit derived using Defra's Damage Costs Appraisal Toolkit (March 2021) over an 11 year appraisal period from 2021 to 2031, for a 2021 base year and using damage costs for "Road Transport Central London".</p> <p>Total reductions in emissions between 2021 and 2031 derived by linearly interpolating between estimated changes in emissions in 2021 and 2031 respectively, with 'Minimum' and 'Maximum' values representing the minimum and maximum changes in emissions between the various scenarios considered.</p>		

5.4 Objective: Reduce Carbon Dioxide Emissions

Estimated changes in Car, PHV, LGV and HGV CO₂ exhaust emissions within central London with the Proposed Changes are shown in Table 5-5, with a more detailed breakdown provided in Appendix D. These data indicate that:

- Annual CO₂ exhaust emissions associated with these vehicle types are estimated to decrease by 1.7 per cent to 1.8 per cent in 2021⁶ and 1.7 per cent to 1.8 per cent in 2031 as a result of the Proposed Changes
- Greater absolute reductions in CO₂ emissions are estimated to occur in 2021 than in 2031, as vehicle exhaust emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in CO₂ emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.5 per cent to 5.7 per cent)
- The majority of the reductions in CO₂ emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

⁸ <https://www.gov.uk/government/publications/assess-the-impact-of-air-quality>

Table 5-5: Estimated Changes in Car, PHV, LGV and HGV CO₂ Emissions within central London with Proposed Changes

Time Period	2021 ⁶ Reference Case		2021 ⁶ Hybrid		2031 Reference Case		2031 Hybrid	
	T/yr	%	T/yr	%	T/yr	%	T/yr	%
Annual	-1,870	-1.7%	-1,990	-1.8%	-1,490	-1.7%	-1,580	-1.8%
Weekday, 7am-6pm	-820	-1.7%	-850	-1.7%	-650	-1.6%	-670	-1.6%
Weekend, 12pm-6pm	-1,050	-5.5%	-1,150	-5.6%	-840	-5.5%	-900	-5.7%
Note: Values presented in T/yr in table above are rounded to the nearest 10 tonnes, whereas the percentages presented are exact.								

Overall Impact

The Proposed Changes are estimated to result in a minor reduction in emissions of Car, PHV, LGV and HGV derived CO₂ in central London and are therefore expected to have a **minor positive** impact.

5.5 Summary of Findings

Table 5-6: Summary of the Potential Impacts of Proposed Changes to the Congestion Charge on London's Environment

IIA Objective	Description of Impact	Duration (Short, Medium, Long)	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)
To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure	Minor reduction (approximately 1.5%) in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within central London as a result of a reduction in vehicle kilometres travelled. The greatest reductions in emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (approximately 5%).	Long	Low	High	+1 Minor positive
To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	Minor reduction (approximately 1.5%) in annual emissions of CO ₂ within central London as a result of a reduction in vehicle kilometres travelled. The greatest reductions in emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (approximately 5%).	Long	Low	High	+1 Minor positive

6 People (Health & Equalities)

6.1 Introduction

This section analyses how the Proposed Changes are likely to perform against the ten objectives relevant to Health and Equalities. The mapping exercise undertaken as part of the initial scoping of the IIA (refer to Appendix B) identified specific Health and Equalities IIA Topics and associated objectives to be included in the assessment.

The assessment considers the impacts of the implementation of the Proposed Changes on people with protected characteristics as defined in the Equality Act 2010 as well as low income Londoners. Specifically, the following relevant protected characteristics are considered: age, disability, sex, race, pregnancy and maternity, gender reassignment, religion and belief, and sexual orientation.

Two over-arching objectives relate to the Health and Equalities Impact Assessment:

- Objective 1: To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- Objective 2: To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.

Under these two overarching objectives, the People assessment specifically considers impacts associated with each of the following objectives. For each objective, one or more related health determinants are identified.

- Objective 3: To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure
 - Air quality
- Objective 4: To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure
 - Noise
- Objective 5: To enhance and improve connectivity for all to and from and within and around London and increase the proportion of journeys made by sustainable and active transport modes
 - Accessibility, connectivity and active travel
- Objective 6: To maximise accessibility for all in and around London
 - Accessibility, connectivity and active travel
 - Access to health and social care services and other social infrastructure
- Objective 7: To maintain and strengthen London's position as a leading, connected, knowledge-based global city and to support a strong, diverse and resilient economy providing opportunities for all
 - Access to work and training
- Objective 8: To ensure London has socially integrated communities which are strong, resilient and free of prejudice
 - Social integration and inclusive design
- Objective 9: To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness, reducing the need to travel by motorised transport

- Social integration and inclusive design
- Objective 10: To contribute to safety and security and generate the perceptions of safety
 - Crime reduction, community safety and road traffic collisions.

This chapter assess how the Proposed Changes contribute towards the realisation of all ten objectives considered relevant to the Health and Equalities IIA Topics. The two over-arching objectives are considered through the lens of Objectives 3 – 10, with overall impacts on health and equalities reported for each. The specific equality groups impacted are identified under the assessment of each objective below.

6.2 Objectives: Air Quality and Noise

Air Quality

Objective 3: To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.

People living in the CCZ

Estimates suggest that exposure to outdoor air pollution contributes to 40,000 deaths per year in the UK (Royal College of Physicians, 2016). The main pollutants from vehicle emissions are particulate matter (PM₁₀ and PM_{2.5}) and nitrogen oxides (NO_x), which can affect lung function and cause respiratory problems.

The Mayor of London identified air quality as a priority area for policy in the London Environment Strategy (LES) published in May 2018, which contains a range of actions to improve air quality in London over the short, medium, and longer term, and it is a priority in the 2019 Health and Care Vision for London. The LES highlighted road traffic as one of the key causes of poor air quality in the city and set an objective to achieve compliance with UK and EU limits as soon as possible. Promoting mode shift and tackling traffic and congestion is a key focus of London transport policy as fewer vehicles on the road results in lower emissions, which helps to reduce air pollution.

As reported in Chapter 4: Environment, minor reductions in emissions of nitrogen oxides and particulate matter within central London are predicted due to a reduction in vehicle kilometres travelled with the Proposed Changes in place, and there would be a resulting **minor positive** impact on air quality within the CCZ in the long-term.

People living in deprived areas in the CCZ

People living in more deprived areas can be exposed to higher concentrations of air pollution and higher noise levels, often because homes and residences of these groups are situated next to busy roads with higher concentrations of emissions. Data regarding health inequalities in relation to socio-economic deprivation and environment is provided in Appendix E.

Existing levels of deprivation in the CCZ are mixed and unequal: the CCZ includes localities within the 10 per cent most deprived and the 10 per cent least deprived nationally as measured on the Index of Multiple Deprivation (refer to Figure E5.4). The areas of greatest deprivation within and surrounding the CCZ are within the boroughs of Tower Hamlets, Hackney, and Southwark, and some areas in the east of Westminster. Reducing air pollution through implementation of transport policies aimed at promoting mode shift and reducing congestion, such as the Proposed Changes, may improve health outcomes to a greater extent for those living in the more deprived areas of boroughs within the CCZ and help to reduce health inequalities.

Black, Asian and minority ethnic people

A recent study commissioned by the Greater London Authority (GLA) aimed to identify whether air pollution has a role in health and social inequality, and the degree to which this could be quantified. It also aimed to investigate the impact of future policy such as those in the LES on inequalities in exposure (Aether, 2019). The study found that areas which have the highest numbers of mixed/multiple ethnic group residents are more likely to have the highest levels of NO₂ in 2013, whereas those with the highest numbers of white residents are more likely to have lower concentrations (Aether, 2019).

The study identified that *'the LES will make a significant improvement to future air quality and that the areas currently facing the worst challenges are projected to undergo the greatest improvement. These areas are often those with the highest levels of deprivation and with the largest proportion of residents from non-white ethnic groups.'* (Aether, 2019, p.38). This conclusion is also supported by a recent study undertaken by Imperial College London (2021) which looked at the impact on health of the Mayor's air quality policies and air pollution in London. The research found that the life expectancy gains from air quality interventions were greater in Inner London, including in some more deprived boroughs, probably due to the greater concentration reductions in Inner London and to variations in baseline mortality rates (Imperial College London, 2021). While the Proposed Changes are not specifically included within the policies assessed as part of the GLA and Imperial College London research, it could be assumed that any policy that may improve air quality in London would support life expectancy improvements and health benefits, especially for black, Asian and minority ethnic people and people living in deprived areas (where these groups are often disproportionately represented).

Children, older people, disabled people, and pregnant women

Inner London boroughs have a lower burden of air pollution related mortality due to their younger age profile; however, for other air quality related health outcomes, such as asthma admissions in children, boroughs with younger populations are more affected (Imperial College London, 2021). The reduction in emissions of nitrogen oxides and particulate matter within central London as a result of the Proposed Changes would have a beneficial impact on children at primary schools in the CCZ, all of which are situated in locations where the safe exposure limits for these pollutants are exceeded. The reduction in pollutants may improve health outcomes relating to respiratory problems in children, such as asthma.

Older people, people with relevant disabilities (such as chronic lung or heart conditions), and pregnant women are also more susceptible to air pollution. There is a lower proportion of older people living within Inner London (including within the CCZ) than Outer London, and research shows there are a greater number of deaths as a result of air quality in Outer London due to the older population, despite pollution levels there being relatively lower (Imperial College London, 2021). Data was not available for the purposes of this IIA to assess whether traffic may be displaced to Inner and Outer London from the CCZ as a result of the Proposed Changes, and whether displacement could result in changes in pollutant concentrations in these areas. However, it is expected that there would be health benefits for older people, pregnant women, and disabled people with chronic conditions living and travelling within the CCZ due to the reduction in pollutant emissions with the Proposed Changes in place.

In summary, improvements in air quality from a reduction in pollutant emissions as a result of the Proposed Changes are assessed to result in **minor positive** impacts for people living and travelling within the CCZ. The most beneficial change in health outcome would be experienced by groups who are particularly susceptible and/or highly exposed to poor air quality, including black, Asian and minority ethnic people, young people and children, older people, pregnant women, those with relevant disabilities, and people living in deprived areas in the CCZ. There are no negative impacts associated with a reduction in pollutants.

Noise

Objective 4: To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

People living in the CCZ

In Greater London almost 2.4 million people are exposed to road traffic noise levels that are above the WHO threshold for outdoor noise levels (55dB). Road traffic dominates the noise environment within the CCZ during the day; a cohort of people surveyed for the City of London Noise Strategy 2016 – 2026 cited road traffic as the noise source they noticed most often. The Proposed Changes would result in fewer vehicle trips within the CCZ when compared to the scenario without the Proposed Changes, and it is considered that fewer vehicle trips may result in lower overall ambient noise levels. However, changes to noise levels as a result of the Proposed Changes are likely to be small, and any changes to the local noise environment are unlikely to be within the perceptual range of most individuals.

Previous noise monitoring undertaken following the introduction of the Congestion Charge in 2003 can be used as a benchmark for comparison. Following its introduction, the volume of traffic for all vehicles crossing the charging zone boundary during charging hours between 2002 (before charging) and 2003 (after charging) reduced by 14 per cent for inbound traffic and 18 per cent for outbound traffic (Transport for London, 2004). Despite this reduction, which was considered statistically significant, the Second Annual Report for the Congestion Charge Zone (Transport for London, 2004) reported no evidence from sample noise measurements in and around the charging zone of significant changes in the ambient noise climate. However, it was noted that the perception of air quality and noise in the area improved after the introduction of congestion charging, although this was not mentioned to respondents beforehand as a possible factor (Transport for London, 2004). While this perception does not accord with the noise monitoring results, the Report surmised that *'it is possible that smoother traffic flow alters the noise climate by reducing the incidence of (more annoying) peaks, such as from braking and accelerating, associated with congested stop-start traffic conditions.'* (Transport for London, 2004, p.98). However, the difference in noise levels are unlikely to be as perceptible as a result of the Proposed Changes due to the less substantial reduction in vehicle trips forecast compared with the introduction of the CCZ (Table 6-1).

Taking the above into account, it could be assumed that any reduction in traffic within the CCZ has potential to have a beneficial effect for residents through reducing noise levels. This is more likely to be noticed by residents during the extended charging hours at weekends, when the level of traffic reduction is highest and the background noise from construction and other activities is not present. Furthermore, at these times, reductions in noise levels may have differential beneficial impacts for disabled people that are hypersensitive to loud sounds, such as those with Autism.

Overall, the changes to noise levels in the CCZ as a result of the Proposed Charges are likely to be positive, but probably only perceptible during weekend charging hours, and the extent to which this could affect human health of residents within the CCZ would be very minor. A **neutral impact** on the noise environment and associated health effects is therefore predicted.

6.3 Objectives: Connectivity, Accessibility and Social Integration

Connectivity, Accessibility and Active Travel

Objective 5: To enhance and improve connectivity for all to and from and within and around London and increase the proportion of journeys made by sustainable and active transport modes.

People travelling within the CCZ

The forecast number of vehicle trips (not including by public transport) indicate that the Proposed Changes would result in a reduction of total freight and non-freight vehicle trips made within the CCZ. However, the scale of this reduction varies considerably between weekday and weekends as set out in Table 6-1.

Table 6-1: Forecast changes in trips in CCZ with Proposed Changes (2031)

Time Period	Car (Business and Other)	PHV	Freight (HGV and LGV)
Weekdays 0700-1800	-4%	-3%	-1%
Weekends 1200 - 1800	-15%	-11%	-3%

As set out in Section 4, the Proposed Changes are estimated to result in an additional 6,000 trips by public transport on weekdays between 7am and 6pm, and 8,000 on Saturdays and Sundays between 12pm and 6pm. Furthermore, the Proposed Changes are forecast to result in an increase in uptake of active travel modes, with an additional 400 cycle trips and an additional 1,500 walking trips during weekday charging hours and an additional 2,800 during weekend charging hours. Active travel is the main source of physical activity for Londoners, and physical activity helps to prevent and manage over 20 chronic conditions and diseases, including some cancers, heart disease, type 2 diabetes, and depression.

Other factors which could influence peoples' willingness to use active travel modes could be positively impacted, for example improvements in amenity as a result of relief from severance (fewer vehicles making it easier for pedestrians to cross the road), a change in people's perception about road safety, better air quality and lower noise levels. As outlined in the baseline, busy roads and excessive noise are cited by people as barriers affecting their desire to walk to a destination. Although these factors are not expected to change significantly as a result of the Proposed Changes, minor improvements (particularly during weekend charging hours) could encourage more people to use sustainable and active travel within the CCZ, providing health benefits from increased physical activity.

Lower levels of road traffic can help to reduce the risk of road fatalities and injuries for those using sustainable and active travel modes (e.g. walking and cycling), making these modes safer and encouraging people to use them. The overall reduction in private vehicles should also facilitate, where appropriate, the permanent installation of streetspace schemes to provide additional space for sustainable and active travel modes. For example, freeing up street space to be provided for cycling infrastructure within the CCZ would help to address road danger and reduce conflict between cyclists and motorists. These factors may improve peoples' confidence and perceptions of safety for walking and cycling. The impact of the Proposed Changes on road traffic collisions is discussed further below.

During stakeholder engagement it was highlighted that road space for sustainable modes needs to be prioritised to allow for mode shift to continue. Stakeholders also noted that additional facilities and cycle parking may be required to sustain the increase in the volume of bicycles, adapted bicycles and scooters on the street. It was also raised by stakeholders that everyone has different needs and there is no 'one size fits all' - different groups of people will be affected more than others, and some people may not be able to easily switch to active travel or sustainable modes. Additionally, stakeholders noted that large volumes of cyclists can impact on accessibility for pedestrians.

Overall, a **minor positive** impact on health outcomes would be expected as a result of improved amenity, connectivity and increased uptake of sustainable and active travel within the CCZ, particularly for those that do not have access to a car. The increased trips made by active travel may equate to a general increase in physical activity for those travelling within the CCZ, and an overall **minor positive** impact on physical and mental health is expected for people cycling and walking within the CCZ in the medium to long term.

Older people may experience a greater benefit to their health from increased active travel as they are less likely to participate in sports and recreational activities, instead tending to stay active through walking and cycling (Transport for London, 2014).

Objective 6: To maximise accessibility for all in and around London.

People with low incomes, black, Asian and minority ethnic people, women, older and disabled people – access by bus

Journey time data from Section 6 of this report indicates that, in total, an estimated 37,500 hours of travel time will be saved per week by those travelling by car, PHV, LGV and HGV as a result of the Proposed Changes. It is expected that similar time savings would also be experienced by people using buses. Baseline data on the use of transport modes in London by different population groups (refer to Appendix E) indicates that this mode of transport is disproportionately used by people living in areas of deprivation and on low incomes, black, Asian and minority ethnic people, women, older people, children and young people, and disabled people.

However, a modal shift to buses may also result in increasing numbers using services and as such reducing the quality of the passenger experience for those that regularly use them; particularly people who require space for manoeuvring and storing wheelchairs and prams. As identified in the baseline, '*passengers pushing and shoving each other*' is a common response for disabled people and women when asked to identify potential barriers to them using public transport, with 33 per cent and 30 per cent identifying this as a barrier to using public transport respectively (TfL 2019a). The potential for increased crowding on public transport to generate safety concerns around the transmission of coronavirus is discussed under Objective 10.

Overall, there is likely to be a **minor positive impact** on bus users associated with the benefits of faster journey times and reliability as well as a **minor negative impact** particularly for disabled people and women due to increases in crowding.

Low income, disabled people, and women – access by PHV

Where increases in the Congestion Charge are passed onto PHV customers through fare increases, evidence from the 2018 IIA of Changes to the London Congestion Charge Scheme (Mott Macdonald, 2018) suggests that this impact could be disproportionately experienced by low income Londoners (earning less than £5,000 per year), women and disabled people who make greater use of PHVs than other groups. PHVs which are designated wheelchair accessible will continue to be exempt from the Congestion Charge and, as such, this will reduce the likely impact of the Proposed Changes on some disabled passengers, though it is acknowledged that only a very small proportion (less than one per cent) of the PHV fleet is currently wheelchair accessible.

Overall, impacts on most low income Londoners who regularly use PHVs are likely to be **neutral** as they should be able to choose a larger operator that is able to spread the additional costs over multiple journeys. However, there may be minor negative impacts on low income Londoners who rely on smaller local PHV operators to make regular journeys during the proposed weekend charging hours. These impacts are likely to be experienced where those operators make fewer journeys into central London and are therefore less able to spread the costs of the charge.

Disabled people

The Proposed Changes retain the 100 per cent discount to those who hold a blue badge⁹, or equivalent badge colour, for central London boroughs. Those eligible for a blue badge in England qualify through the higher rate of the mobility component of the Disability Living Allowance (DLA), or meet the moving around criteria (8 points or more), or the journey planning criteria of the Personal Independence Payment (PIP). As set out in Appendix E, in 2020 90 per cent of valid Blue Badges (113,229) within London were eligible through DLA and PIP thresholds. Disabled people without a blue badge may be disproportionately financially impacted by the increase in charge, as evidence indicates that people with disabilities in London earn on average 15.3 per cent less than non-disabled people (ONS 2019). However, eligibility for the blue badge was extended in 2019 to include people who experience very considerable difficulty when walking (which may include very considerable psychological distress), or are at risk of serious harm when walking, or when walking pose a risk of serious harm to any other person.

It is considered that this extension of the blue badge scheme will help to avoid negative impacts of the Proposed Changes for the majority of disabled people who require to travel within the CCZ by motorised transport. There may be a minor negative impact on those disabled people who still do not qualify and need to travel by private vehicle during the extended operating hours at weekends (for example to attend medical appointments).

Stakeholders also highlighted the potential impacts on some disabled people (mental or physical health condition) who benefit from the Department for Work and Pension's Access to Work Scheme. This provides for taxi or PHV fares to work or a support worker if an individual cannot use public transport. Anecdotal evidence has suggested that the Congestion Charge has led to some PHV drivers refusing to accept Access to Work passengers travelling to the CCZ, to avoid paying the charge. Given that designated wheelchair accessible PHVs and all taxis are exempt from the charge, it is considered that people who rely on this scheme should be able to find an alternative operator/vehicle, and may be eligible for the Taxicard service (the majority of which are undertaken by taxi rather than PHV).

Stakeholders noted incidences of PHV drivers terminating passenger trips outside the CCZ boundary to avoid paying the charge, and highlighted the differential impacts that this is likely to have on some disabled people (including blind people) who may be unable to continue their journey to their final destination without assistance. Passengers are able to report such incidences to TfL to investigate, and action may be taken against drivers who have failed to complete journeys.

Access to Health and Social Care Services and Other Social Infrastructure**Objective 6: To maximise accessibility for all in and around London.***People with low incomes*

There is a high concentration of health and social care services within the CCZ, as shown in Figure 10-14. Access to health and social care services is an important determinant of health and wellbeing. Issues in accessing transport are a key reason for people missing healthcare appointments. This could be partly as a result of the costs associated with both motorised (private vehicle, taxis and PHVs) and public transport, particularly for vulnerable people on low incomes, which can lead to health problems from missed appointments, late diagnoses, and lack of treatment.

⁹ The blue badge system differs between the Central London Boroughs which allocate different colour of badges, consisting of City of London (Red), Kensington and Chelsea (Purple), City of Westminster (White) and Camden (Green). The eligibility differs between Boroughs however the difference in badges, eligibility and where they can be used is not considered a CCZ issue.

People on low incomes travelling to access health and social care services by motorised transport may be disproportionately impacted by the Proposed Changes, as the increased financial cost prevents them from entering the CCZ to seek treatment. However, even without the Proposed Changes the existing cost of parking in the CCZ is likely to mean that motorised transport is already unaffordable for low income households; for example, St. Thomas's Hospital charges £3.20 per hour, while Moorfields has no on-site parking and patients would need to pay on-street parking fees if accessing the facility by vehicle. As such, it is considered that the Proposed Changes would have a **neutral impact** on the accessibility to health and social care services within the CCZ for people on low incomes as there are cheaper means of transport available as an alternative to motorised transport.

The issue of the unreliability of public transport caused by delays and disruption on the network can also result in the negative health outcomes arising from missed appointments discussed above. Addressing this unreliability through reduced congestion within the CCZ as a result of the Proposed Changes may result in more people being able to attend medical appointments on time, which would have a **minor positive impact** on health.

Pregnant women, disabled people and older people

Certain groups of people may require access to healthcare facilities more often than others - such as pregnant women, disabled people and older people - and may therefore be disproportionately impacted by the Proposed Changes. The pre-pandemic scheme provides for reimbursements which it is considered could mitigate the impacts on these groups; the criteria apply to 'relevant patients' which have a compromised immune system; require regular therapy or assessment; or require recurrent surgical interventions. The patient must also be clinically assessed as too ill, weak, or disabled to travel to an appointment on public transport.

The assessment identified an existing uncertainty regarding the eligibility of pregnant women for the NHS patient reimbursement. The pre-pandemic scheme reimbursement criteria may not sufficiently cover women at advanced stages of pregnancy as it may be open to interpretation by healthcare professionals. Consequently, pregnant women may be subject to a disproportionate financial impact due to the requirement to attend multiple appointments over the course of their pregnancy. This impact could be exacerbated by higher charges or in newly charged hours. There are two maternity hospitals located within the CCZ (Guy's Hospital and St Thomas'). The pre-pandemic Congestion Charge may have a disproportionate impact on pregnant women and their families who travel by car and are required to travel from outside the CCZ to attend antenatal appointments (during charging hours) over the course of the pregnancy and before or after birth; especially at an advanced stage of pregnancy when using public transport may be less convenient/practical.

The Proposed Changes offer an opportunity to review the existing eligibility criteria and the way they are applied to different groups, and to consider how the reimbursements can be better communicated to service users. This could be done through the NHS trusts to identify how best to adapt and/or apply and communicate the eligibility criteria to ensure that the pregnant women are covered by the reimbursement scheme.

In relation to impacts on other vulnerable people, the pre-pandemic reimbursement eligibility criteria covers 'relevant patients' who may have difficulty travelling by public transport as outlined above. However, details of reimbursements may not be fully known by NHS patients who are eligible. To capture these cases and reduce potential impacts on health, further promotion of the scheme is recommended to raise awareness of the pre-pandemic scheme criteria, particularly for NHS patients who are disabled older or on low incomes.

Overall, the Proposed Changes will have a **neutral impact** on pregnant women, disabled people and older people requiring access to the CCZ for healthcare; however it is recognised that there may be a degree of uncertainty among members of the public regarding the existing NHS patient eligibility criteria and that the Proposed Changes present an opportunity to address this.

People receiving care (disabled people, older people)

The Proposed Changes may also have financial and health implications for people receiving care from self-employed or informal carers, whose carers are required to pay the charge for entering the zone using their own private vehicle and who are not eligible for reimbursement. The Kings Fund (2021) estimates that local authorities only fund approximately 25 per cent of adult social care requests they receive from residents, so it may be assumed that the remaining 75 per cent either pay for their own care entirely or rely on family/friends.

Research by the King's Fund also found that unpaid carers provide the equivalent of four million paid care workers to the social care system (Kings Fund, 2021). In 2011, 128,577 people in London provided unpaid care to others (NOMIS 2011). This provision of care was relatively even across the different boroughs within the CCZ (refer to Appendix E). Across England, women represented a significantly higher proportion of carers (57.7 per cent) compared to men (43.2 per cent) in 2011 (ONS 2013).

The Congestion Charging Impacts Monitoring Sixth Annual Report (Transport for London, 2008) surveyed a cohort of people in relation to changes in their travel patterns within the CCZ following the western extension of the zone. The survey found that those visiting someone as a carer reported a drop of nearly 10 percent in the frequency of visits made during charging hours. This reflects the findings of interviews undertaken in 2006 and 2007 with disabled people and carers¹⁰, which found that some disabled people resident in the CCZ felt lonely and isolated during the daytime as friends and family avoid visiting during charging hours and instead visit during evenings and weekends. Respondents were also more reluctant to ask for help if it meant their friends and family would have to pay the charge. As the Proposed Changes would introduce charging on Saturday and Sunday afternoons, this could therefore reduce visits from friends and family to disabled or older people within the CCZ during these times. However most social care would continue to be provided within the pre-pandemic weekday charging hours, or in the evenings when the charge is not in place. A new charge would be introduced at the weekends; in some situations this could be avoided depending on the time of travel, though it is acknowledged that there may be an overlap with mealtimes or administering medication for those receiving care.

Overall, the impact on older and disabled people dependent upon car-based formal care services that is not funded by adult social care services (or is provided by family and friends) is considered likely to have a **minor negative impact**.

People with different religions or beliefs

As shown in Figure 10-14, there are 131 places of worship located within the CCZ. Many types of religious services and associated religious education take place during weekends and weekday evenings. The Proposed Changes would impose a new cost on those people who do not currently qualify for pre-pandemic discounts or exemptions who only need to access religious services within the CCZ by car during the extended charging hours on Saturday and Sunday, although the temporary extension of the charging hours to Saturday and Sunday as part of the temporary changes to the Congestion Charge in June 2020 means this is already being incurred in practice. Although places of worship in Central London are highly accessible by public transport it is acknowledged that there may be some reasons why worshippers who currently drive may find it difficult to switch modes:

- Many specialist and/or historic places of worship are located within the CCZ. While there may be alternative religious facilities available outside the CCZ, people are unlikely to change their preferred place of worship due to the specialist nature of these venues

¹⁰ Face to face in-depth interviews were carried out with 60 disabled people and carers resident in the original congestion charging zone and the western extension in 2006 and 2007, before and after the introduction of charging in the western extension.

- Due to their specialist nature, many have large catchment areas, including places in which public transport accessibility may be low on weekends (particularly Sunday)
- The demographic profile of participants in some religious services includes a large proportion of older people who may find it difficult to switch to public transport, walking or cycling. In 2019, for example, 33 per cent of regular worshippers at Church of England Churches were aged 70 or over.

During stakeholder engagement it was highlighted that people accessing places of worship in central London will already have been impacted by the Temporary Changes to the Congestion Charge introduced in June 2020, and that older people and disabled people may find it difficult at the weekend to access the CCZ on public transport due to service disruption. It was also noted that City of London/Westminster City Council do make parking exemptions at the weekend for some places of worship.

Although charges on weekends would be limited to between 12pm – 6pm, religious services often take place at several times on weekends (and vary considerably depending on faith). Overall, it is considered that there may be a **minor negative impact** on people practicing faith or belief travelling to the CCZ for the purposes of worship due to the extended charging hours on Saturday and Sunday. It is considered that the majority of impacts related to accessing religious facilities would be short-term and would eventually result in a mode shift away from motorised transport, and/or places of worship may amend the timing of their services.

Access to Work and Training

Objective 7: To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economy providing opportunities for all.

People on low incomes

Certain employment sectors operating within the CCZ, and the people working within these sectors, have the potential to be disproportionately impacted by the Proposed Changes. Those on low incomes are more likely to work in jobs that cannot be done from home, such as in the hospitality sector, so will have more need to travel. Under the Proposed Changes, those that are dependent on a car or PHV to make journeys to work may find it more difficult and expensive to travel within the CCZ, particularly at weekends.

However, the cost of an Adult Daily off-peak travelcard (£13.90 for Zones 5/2 to Zone 1, or £12.70 daily capped fare on an Oyster Card) is cheaper than paying the £15 Congestion Charge (in addition to potential parking charges) for those that require to access the CCZ on weekends. In addition, bus travel in London is capped daily at £4.65 and weekly (Monday to Sunday) at £21.90 for an adult. As such, although the Proposed Changes may result in a negative financial impact to those that require access by car at those times on Saturday and Sunday not previously subject to the Congestion Charge, there are alternative means of travel which are less expensive. The impact of the Proposed Changes is therefore likely to be focused on those people who:

- Are unable to access public transport, for example due to a lack of service on Saturday and/or Sunday (in relation to people travelling from outside Greater London) and will therefore be subject to a new £15 charge; (or part thereof depending on different variables) and/or:
- Are required to transport heavy equipment by car/van to and from their place of work (and will therefore experience either an increase in cost of 30 per cent if travelling during weekday charging hours, or an entirely new cost of £15 if travelling on a Saturday or Sunday afternoon)¹¹.

¹¹ NHS Staff are eligible for reimbursement for specific trips (see table 2.3).

Low income: Retail, hospitality and leisure workers.

As identified in Section 7 (Economy), three sectors of London's economy are considered to have the potential to be negatively impacted by the Proposed Changes: namely retail, hospitality and leisure activities as they operate at weekends more than many other industries in Central London. These sectors consist of around 310,000 jobs within the CCZ and only 10 per cent of individuals in these sectors travel to work by car, van, taxi or PHV. In London, median annual gross income in 2019 was just under £20,000 for employees in the accommodation and food services and retail industries and approximately £24,500 for those employed in arts, entertainment and recreation (ONS, 2019).

This is most likely to impact upon people required to carry heavy equipment to their place of work that are not eligible for reimbursement under the pre-pandemic criteria. For example, performers or personal trainers who need to transport heavy equipment at weekends for events on Saturday and Sunday afternoons within the CCZ. These people may have lower incomes and would be less able to absorb the financial burden, particularly since performers have been unable to play live shows during the coronavirus pandemic. Research undertaken by Essex Business School Centre for Work (2021) surveyed live performers and found that, for 94 per cent of participants, lockdown and social distancing had resulted, entirely or largely, in a loss of income from performance work and 67 per cent needed to access financial support from the government or other organisations during the pandemic. The Proposed Changes may exacerbate the financial burden on performers who need to transport equipment within the CCZ on a Saturday or Sunday afternoon. Although some performers may be reimbursed by venues as part of their payment, this is unlikely to apply in all cases.

During stakeholder engagement it was noted that the unreliability of public transport on the weekends due to maintenance and associated service disruption can be a potential barrier preventing people working in the CCZ from accessing employment. It was suggested by one stakeholder that reimbursements could be made available to people required to travel by motorised vehicle into the CCZ for work as a result of a public transport service disruption.

Overall, given the timing of the new hours of operation at weekends and the limited number of people who would be directly impacted (in relation to the overall workforce in these sectors) it is considered that the extension of the charge is likely to give rise to a **minor negative impact** on low income people working at weekends and commuting by car in retail, hospitality and leisure industries.

Low income: PHV drivers

Based on recent TfL data, 78 per cent of PHV drivers who gave information were not from a white background. (The 2018 IIA for the removal of the PHV exemption undertaken by Mott MacDonald found that 94 per cent of PHV drivers were not from a white British background (Mott Macdonald, 2018)). In April 2019, the Congestion Charge exemption for (non-designated wheelchair accessible) PHVs was removed. The impacts predicted as a result of these cost increases on the sector were reported in an IIA study produced for TfL (Mott MacDonald, 2018). Key findings in terms of the impact on drivers included:

- Only 33 per cent of PHV drivers made journeys into the CCZ during weekday (0700-1800) charging hours
- The scale of impacts would be dependent upon the ability for operators and/or drivers to spread costs across passenger journeys and how they choose to operate
- Some drivers / operators were expected to specialise, (i.e. focusing on or deploying specific PHVs for journeys within the CCZ and so spreading the cost over more journeys), which would reduce the potential impact of the costs regardless of whether they choose to pass on the cost to passengers or absorb it
- For drivers operating in the suburbs and towns on the periphery of London there would be a risk to the revenue stream (i.e. potentially inducing modal shift) of longer, central London-bound fares. Some PHV

operators may have to pass the charge directly on to passenger fares when journeys enter the CCZ, as they may be less able to justify spreading the cost of entering the CCZ among all customers, as this would make them uncompetitive in their local market

- In the event that PHV drivers took the burden of the costs, certain protected characteristic groups were identified to experience minor adverse impacts, notably black, Asian and minority ethnic and female drivers. Although women make up only 2 per cent of PHVs drivers, they were assessed to be disproportionately impacted on the basis that they are more likely to work part time and therefore less able to spread the cost of the charge across a number of journeys.

Section 7 of this IIA considers the impact of the Proposed Changes on the PHV sector. It acknowledges that the impacts of the changes are likely to be experienced differently depending on the size of the operator, with the smaller operators finding it more difficult to spread the costs across a large number of journeys. Experience indicates that the larger operators (i.e. Uber, Ola, Bolt) have introduced a fixed fee which is added to fares (currently typically £1.50) for journeys that start, end or pass through the CCZ. This applies 24 hours a day 7 days per week and the drivers are said to receive the full fee. Monday to Friday the proposed increase in the Congestion Charge of £3.50 is not considered to have an impact on the majority of PHV drivers who work for an operator that has introduced an additional fee, as it would only require an additional 2-3 trips to cover the additional cost (and some drivers may already carry out sufficient trips to recover fully the additional cost). However, some stakeholders from the PHV sector have emphasised that the burden of the charge falls entirely on the drivers, rather than the operators. To mitigate this, one suggestion made by stakeholders was for TfL to levy a minimum fee on all PHV operators, instead of charging individual drivers.

However, the use of PHVs varies across London. The results of the 2017 PHV and Taxi Driver Diary Survey (Steer Davies Gleave, 2017¹²) for PHV origins and destinations is given in Table 7-4 Across the day, over 75 per cent of PHV trips do not enter the CCZ, while approximately 1 in 20 trips are entirely within the CCZ.

Overall, the impact of the extension of the charge into the weekends (12pm-6pm) is not expected to have a negative impact on PHV drivers who operate primarily in or to and from the CCZ. However, there is the potential for a **minor negative** impact to some drivers – those who work for PHV operators who are not able to change their fares in response to the Proposed Changes, with £15 equivalent to the profit from several standard fares. The impact would be experienced by those PHV drivers work in the CCZ during the daytime at weekends who previously did not pay the Congestion Charge, and differentially by women PHV drivers who are more likely to work part-time.

Young people, children and students: access to education

Access to education and training is also an important consideration due to the close links between education and improved equality and health outcomes. Figure 10-14 shows the location of educational facilities within the CCZ. The Proposed Changes may have an impact upon those that drive to weekend classes located within the CCZ; however, it should be noted that many educational facilities only offer parking for disabled people. Additionally, some places of worship within the CCZ offer religious educational courses and there may be impacts on people from different faiths travelling by motorised transport to access these courses. However, in the majority of cases it is anticipated that it will be possible to access these facilities by public transport or active travel. There may be exceptions where students are travelling from areas with low public transport accessibility, but in such circumstances it should be possible to drive to a station outside the CCZ (or ULEZ expanded area) to gain access to a public transport service to central London at the weekend. A **neutral impact** is therefore expected for students accessing weekend educational classes within the CCZ.

¹² <http://content.tfl.gov.uk/driver-diaries.pdf>

Some parents will drive their children to activities such as Saturday morning lessons at school, or weekend sport fixtures or religious education in the CCZ. Many of these will not be impacted by a charge which does not commence until noon. Even where journeys are required during charging hours, for the majority it is anticipated that journeys will be relatively local in nature, in an area which benefits from the highest levels of public transport accessibility in London. It is understood that, where parents may be transporting multiple children with varying needs and equipment, public transport may be viewed as a more difficult and time-consuming option. However, it is considered that impacts would be largely avoided due to the timing of the charges. For instance where weekend activities would usually fall within the charging hours, schools may be able to amend the timing of their sports fixtures so that parents can avoid paying the charge.

Where sporting fixtures or other activities take place between schools, it would be expected that the school would provide transport for students from their site using a school bus or 9+ seater minibuses which are exempt from the charge, so there would be no additional financial impact on the school of the extension of the charging hours.

Overall, it is considered there will be a **neutral impact** on access to education for children and young people as a result of the Proposed Changes.

Social Integration and Inclusive Design

Objective 8: To ensure London has socially integrated communities which are strong, resilient and free of prejudice.

Access to basic services and social infrastructure is important for health and wellbeing, particularly for vulnerable people who may require additional support to integrate into the community. The Proposed Changes will impose additional costs on charitable organisations which provide support to vulnerable people within the CCZ during the weekday and weekend charging hours. This may include providing transportation to hostels for rough sleepers or safe refuge for victims of domestic abuse, as well as soup kitchens or food banks which rely on motorised transport for heavy equipment and supplies. The additional costs during the week are unlikely to have a discernible impact on these activities. It is unknown to what extent voluntary services which require transportation on a weekend will be able to adjust the hours they travel within the CCZ to avoid the charging hours, or how many of their vehicles will be exempt (e.g. 9+ seats) or eligible for a discount.

Overall, the extension of the operating hours is considered likely to have a **minor negative** impact on charitable/voluntary services that operate during weekend afternoons. This will be mitigated where the charitable/voluntary services in question fall within the proposed reimbursement provision for certain local authority and charity employees, which was implemented in June 2020 and relates to provision of services beyond those that respond to the pandemic.

In relation to potential impacts on groups accessing community facilities (e.g. community centres), it is considered that the majority of impacts would be avoided due to the likelihood that people accessing these facilities would live locally and would therefore be eligible for the residents' discount, or would be able to use public transport or active travel modes. A **neutral impact** on community groups operating within the CCZ is therefore expected.

Objective 9: To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness, reducing the need to travel by motorised transport.

Severance caused by high levels of traffic in residential areas can prevent people from spending time outdoors in their local community, resulting in reduced social cohesion, loneliness and associated poor physical and mental health effects (Transport for London, 2020).

By reducing traffic levels in central London the Proposed Changes would complement other transport policies in place aimed at promoting placemaking and community integration, such as streetspace schemes, including, for

example, 'School Streets'. The aim of 'School Streets' is to restrict vehicle access to schools at drop off and pick up times, thereby promoting active travel modes for travelling to school. Low Traffic Neighbourhoods (LTNs) – of which there are already several in the CCZ – are also part of the measures implemented by TfL to create more space for walking and cycling. LTNs aim to reduce the amount of traffic on residential streets, making them safer to walk and cycle on, and improving physical and mental health through increased physical activity. There is also potential for an improvement in social cohesion in the LTNs, through making streets a more attractive and safer place for people to socialise, particularly on weekends.

Overall, a **minor positive** (indirect) impact on health outcomes could be expected from improvements to social integration and inclusive design within the CCZ from public realm amenity improvements, facilitated by the reduction in traffic as a result of the Proposed Changes and complementing other TfL policies to promote placemaking.

6.4 Objective: Crime Reduction and Safety

Crime Reduction and Community Safety

Objective 10: To contribute to safety and security and generate the perceptions of safety.

The Congestion Charge is enforced by a network of cameras situated at entry and exit points to the CCZ and at key locations within the zone itself. As such, there is unlikely to be any change in the level of surveillance that could deter illegal driving and other antisocial behaviour, nor would the implementation of the Proposed Changes be likely to cause any increase in crime or fear of crime.

While it is considered that the Proposed Changes would not have an impact on actual levels of crime, some people may be reluctant to shift from a private vehicle to an alternative mode of transport which they perceive to be less safe. Fear and perceptions of crime can act as a deterrent against people using public transport even if the actual levels of crime are low. TfL data indicates that during 2019/20, an average of eleven million passengers travelled on TfL's public transport services each day, with very few of them ever experiencing or witnessing crime. For every one million passenger journeys there were eleven reported crimes, the majority of these being theft offences (Transport for London, 2020b).

Fear of crime within the general population is not expected to be influenced by the Proposed Changes, however, some groups may experience these fears disproportionately which could prevent them from switching from private vehicle to alternative travel modes. Women surveyed by TfL in 2012 cited crime and personal safety as a barrier to using public transport more often, as well as concerns about anti-social behaviour, fear of crime on the bus/train and getting to the bus/train, fear of terrorist attacks, and risk of accidents (see Appendix E). In 2017/18, on average 30 per cent of Londoners reported feeling very or quite worried about their personal security when using public transport (TfL 2019a). This was particularly relevant for disabled people (37 per cent), young people (16-24 years old) (35 per cent), women (34 per cent) and black, Asian and minority ethnic people (33 per cent) (TfL 2019a). It is acknowledged that some of these fears may apply more specifically to using public transport in the evenings or at night, which would not be affected by the Proposed Changes.

In the short-term some people may not feel safe travelling by public transport in the CCZ when they have previously travelled by motorised vehicle. Overall, this is likely to have a disproportionate **minor negative impact** on disabled people, young people, women and black, Asian and minority ethnic people. It is acknowledged that fear of crime may reduce over time due to increased use of public transport as a result of the Proposed Changes. However, it is recommended that additional information is communicated to disabled people, young people, women and black, Asian and minority ethnic people to alleviate concerns about safety on public transport.

Implications of Coronavirus

The immediate impact of the Proposed Changes on mode shift may be affected by ongoing concerns or restrictions related to coronavirus transmission. The duration of this change in travel behaviour patterns is uncertain and is likely to be dictated by the economic and social recovery from the pandemic.

TfL has undertaken research to identify the most important measures to improve peoples' experience while using public transport in relation to coronavirus concerns. Measures being undertaken by TfL to assure the public that the public transport system is safe include ensuring cleanliness in buses, trains and stations, mandatory face coverings on all modes (unless individuals are exempt), and managing capacity in stations, on trains and buses to facilitate social distancing (Transport for London, 2020). While TfL's survey data showed that concern about catching coronavirus remains highest when travelling on public transport compared to other activities, the level of concern has decreased over time, falling from almost 80 per cent at the end of May to less than 70 per cent by mid-September 2020 (Transport for London, 2020). However, perceptions of risk of coronavirus and social distancing requirements are likely to remain a disincentive to public transport use compared to other modes in the short-term.

There is potential for the Proposed Changes to disproportionately impact on vulnerable people who have heightened concerns in relation to coronavirus for reasons relating to health, social and economic inequality. A rapid evidence review undertaken by the Greater London Authority (2020, p. 6) found that *'individuals from marginalised, or disadvantaged, groups who are in precarious situations and who already experienced poorer social, economic and health outcomes, are undoubtedly disproportionately affected by the current situation'* [in relation to coronavirus]. This issue was also raised by stakeholders during consultation. Certain groups have been identified as more vulnerable to the effects of coronavirus, including older people, black, Asian and minority ethnic people, men, and those with underlying health conditions. In addition, those living in the most deprived areas are twice as likely to die from coronavirus than those living in the least deprived areas (City Intelligence 2020). These groups may be forced into using public transport where they do not feel safe, or feel they have no choice but to travel by private vehicle and therefore pay the proposed increase in the daily charge (or cost of taxi or PHV hire).

As discussed above, the Proposed Changes may result in increased numbers travelling by public transport at the weekends and potential crowding may differentially impact on older people, black, Asian and minority ethnic people, men, people living in deprived areas and those with underlying health conditions. A **minor negative impact** is expected on people vulnerable to coronavirus, but this is likely to be short term, as the Proposed Changes will also free up street space for active travel, making these modes more attractive as an alternative to private vehicle. It is also acknowledged that concerns in relation to coronavirus and the safety of public transport but the announcement by the Mayor that the wearing of face coverings will be a condition of carriage on London Transport following the removal of their mandatory use by the UK Government on 19 July 2021 may help to alleviate concerns for some people.

Road Traffic Collisions

Objective 10: To contribute to safety and security and generate the perceptions of safety.

The Mayor's Vision Zero Action plan sets targets of a 65 per cent reduction in all persons killed or seriously injured (KSI) on London's roads by 2022, and a 70 per cent reduction in people killed or seriously injured by a bus by 2022. The Proposed Changes offer an opportunity to work towards the realisation of this target through reducing the number of vehicles trips within the CCZ.

All boroughs within the CCZ perform worse than the England average in relation to road traffic casualties and serious injuries; Westminster is the worst performing borough in London with 97.4 casualties and serious injuries per 100,000 of the population, in comparison to the 42.6 England average. Concerns around road safety present a serious barrier in preventing people from taking up active travel modes, particularly cycling.

Research by the Living Streets charity found that road collisions are unequally distributed across different ethnic and socio-economic groups; people from an ethnic minority (excluding white minorities) who live in a deprived area are three times more likely to be killed or injured walking on Britain's roads than a white person from a non-deprived area (Living Streets, 2021). This may be partially attributed to the amount of time spent as a pedestrian, as people from ethnic minorities and deprived backgrounds are more likely to walk and less likely to have a car.

Removing traffic from the roads, coupled with an existing 20mph speed limit within the CCZ, is a key mechanism through which road traffic collisions can be reduced. TfL studies in relation to traffic flows within the CCZ during the coronavirus lockdown can be used to illustrate how reducing road traffic can lead to a decline in road traffic collisions. Casualty statistics that show a continued decline in the number of people killed or seriously injured on London's roads in 2020, with a 21 per cent decrease over the year compared to 2019 data (Transport for London, 2021). The data show that the greatest reduction in road casualties during the coronavirus lockdown in 2020 was within central London, linked to the larger-scale reduction in activity there (Transport for London, 2020). However, it is also acknowledged that, during the coronavirus pandemic, lower volumes of traffic in central London freed up road space and reduced congestion – meaning that drivers were presented with free-flow conditions – with speed limited only by prevailing speed restrictions and traffic signals, rather than by congestion. This resulted in an increase in average vehicle traffic speeds, which tends to increase the relative severity of casualties (Transport for London, 2020).

Key observations from the TfL data obtained during the pandemic noted the overall reduction in casualties but also that lower levels of motorised traffic had resulted in an increase in the severity of collisions for the vulnerable road users (pedestrians, cyclists and motorcyclists). It is considered that use of motorcycles and scooters to access the CCZ at weekends may increase, as these forms of transport are exempt from the Congestion Charge. Since road users travelling on two wheels are at a higher risk of accidents, there is potential for an increase in road collisions in this group. It was also noted during stakeholder engagement that larger numbers of people walking and cycling as a result of the Proposed Changes may result in an increase in road traffic accidents for these groups.

By way of mitigation and next steps to address these emerging issues, TfL are continuing to work with the Metropolitan Police Service to enforce against unsafe behaviours among all road users, and safety messaging and communications are being adapted in response. It is expected that any potential negative impacts on vulnerable road users from the Proposed Changes would be mitigated by TfL measures already in place and would not be significant in comparison to the change in behaviour seen during the pandemic, where traffic reduction was more severe.

Overall, it is considered that the reduction in vehicle traffic resulting from the Proposed Changes may improve both cycle and pedestrian safety in London and perceptions of general road safety through an overall reduction in traffic flows within the CCZ. There is potential for a **minor positive** impact on health outcomes to arise from reduced fatalities and casualties, and from removing safety concerns as a barrier to cycling. This is likely to have a greater benefit for those that make more use of active travel modes (including public transport) including black, Asian and minority ethnic people, young people, older people and disabled people.

6.5 Summary

The potential impacts of the Proposed Changes on the population of London as discussed in Section 6 are summarised in Table 6-2.

Table 6-2: Summary of Potential impacts on the Proposed Changes on the population of London

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.	<u>Air Quality</u> Improvements to air quality (reduction in emissions of NO _x , PM ₁₀ and PM _{2.5}) which would have positive health outcomes, particularly for people living in the boroughs within the CCZ.	Differential benefits for following groups living in the CCZ: People in deprived communities: Young people and children; Older people; Disabled people; Pregnant women; and Black, Asian and minority ethnic people.	Low	High	+1 – Minor Positive	Long	N/A

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.	<u>Noise</u> M traffic unlikely to be perceptible, as such resulting in negligible effects upon the human health of residents within the CCZ.	Potential for differential positive impact on disabled people living in the CCZ, who are hypersensitive to loud sounds e.g. people with autism.	Low	Low	0 - Neutral	N/A	N/A
To enhance and improve connectivity for all to and from and within and around London and increase the proportion of journeys made by sustainable and active transport modes.	<u>Active Travel</u> Potential modal shift to active travel for those travelling by motorised vehicle within the CCZ as such resulting in positive health outcomes as a result of improved amenity, connectivity and increased uptake of physical activity. Improved safety for pedestrians due to reduction in traffic.	People travelling within the CCZ: Differential benefit to older people.	Low	Medium	+1 – Minor Positive	Long	TfL should continue to identify opportunities to roll out of LTNs and streetspace schemes where these may be facilitated through introduction of the Proposed Changes to support increased physical activity and social cohesion.
	<u>Public Transport Reliability</u> Positive impact for people using bus travel due to potential improvements in journey	People travelling within the CCZ with disproportionate benefit for:	Low	Medium	+1 – Minor Positive	Long	N/A

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
	times and reliability as a result of reduction in congestion.	Black, Asian and minority ethnic people; Women; Young people and children; Older people; and People on low incomes.					
	<u>Public Transport Crowding</u> Negative impact related to the potential increased crowding of public transport for people with mobility impairments and the available space for wheelchairs and buggies as the Proposed Changes may result in a shift to a more affordable means of travel.	Differential impacts for: Disabled people; and Parents/carers travelling with babies	Low	Medium	-1 - Minor Negative	Short	N/A
	<u>Disabled drivers</u> Negative impact upon disabled people not eligible for the blue badge scheme travelling by motorised transport	Disabled people, particularly on low incomes.	Low	High	-1 Minor Negative	Long	Extension of Blue badge scheme in England to people with 'hidden' disabilities in August 2019 has reduced number of people potentially impacted. It is recommended that TfL engage

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
	within the CCZ which may result in barriers to accessing essential services and opportunities during weekend charging hours, or weekday charging hours due to a higher charge level.						with disability groups to raise awareness of discounts available. Taxis (which have a range of accessibility features) and designated wheelchair accessible PHVs are exempt from the Congestion Charge.
To maximise accessibility for all in and around London.	<u>Access to healthcare</u> Impact on pregnant women requiring access to healthcare and medical facilities within the CCZ travelling by motorised transport and are unable to use public transport or active travel.	Disproportionate impact on pregnant women;	Low	High	0 Neutral	Long	Clarify and communicate eligibility of pregnant women for NHS Patient Reimbursement Scheme through NHS Trusts.
	Impact on certain vulnerable groups requiring access to healthcare and medical facilities within the CCZ travelling by motorised transport and are unable to use public transport or active travel	Disabled people; Older people.	Low	High	0 Neutral	Long	Raise awareness of eligibility for NHS Patient Reimbursement Scheme through NHS Trusts.

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
	<p><u>People receiving home-based care</u></p> <p>Negative impact on people requiring help from informal / self-employed carers will be impacted by the cost increase and extended charging hours.</p>	<p>Disproportionate impact on:</p> <p>Disabled people; and</p> <p>Older people.</p>	Low	High	- 1 – Minor Negative	Medium/Long	N/A
	<p><u>Access to Places of Worship</u></p> <p>Negative impact for people who require access to places of worship and attend religious services within the zone by motorised vehicle at weekends and are unable to travel by public transport, walking or cycling.</p>	<p>Disproportionate impact on people with different religions or beliefs, particularly older people who may be unable to travel by public transport.</p> <p>Differential impacts on people attending specialist places of worship within the CCZ.</p>	Low	Medium	- 1 Minor Negative	Short	As minibuses of 9+ seats or more are exempt from the Proposed Charges, it is recommended that TfL encourage faith organisations to consider 'shuttle services' to provide access into the CCZ for religious services.
To maintain and strengthen London's	<p><u>Retail, Hospitality and Leisure Sector workers</u></p>	Differential impact on people on low incomes.	Low	Medium	-1 Minor Negative	Long	

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economy providing opportunities for all.	Negative financial impact for people in low income jobs in these sectors who need to travel to work by private transport to transport heavy equipment e.g. musicians, personal trainers etc.						
	<u>PHV drivers</u> Adverse impact upon drivers working for smaller PHV operators, making fewer journeys into the CCZ who may be less able to spread the additional costs incurred by travelling into the zone during weekends.	Disproportionate impacts on: Black, Asian and minority ethnic people; Low income Londoners Women	Low	Medium	-1 - Minor Negative	Short	TfL policies on emissions standards for PHVs will enable them to avoid charges. Cleaner vehicle discount will remain in place to 2025. Designated wheelchair Accessible Vehicles (WAVs) and Blue Badge holders nominated vehicles receive 100% discount. Option of passing on the charge, whole or in part, to customers.
	<u>Access to Education</u> Neutral impact for people that drive to weekend school/ adult education and education	N/A	Low	Low	0 - Neutral	Short	School buses and minibuses of 9+ seats are exempt from the charges, which could be used to provide access into the CCZ for weekend school sports fixtures or other group activities.

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
	offered by faith groups within CCZ.						
To ensure London has socially integrated communities which are strong, resilient and free of prejudice.	<u>Charitable Organisations</u> Negative financial impact on charitable organisations providing services during weekend charging hours (e.g. soup kitchens run by faith groups). May impact on health of such vulnerable people and prevent them from obtaining food, accessing social infrastructure and integrating into communities.	Differential impact on: Rough sleepers; Low income Londoners	Low	High	- 1 – Minor Negative	Long	Further charitable activities could be considered for reimbursement eligibility or exemption.
To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense	<u>Placemaking</u> Positive impact upon placemaking due to a reduction in traffic, making London's streets safer and more attractive	Disproportionate impact on: Older people Children Disabled people	Low	Medium	+ 1 – Minor Positive	Long	Potential placemaking benefits would be enhanced through roll out of LTNs and streetspace schemes through reducing traffic on residential streets, making them safer to walk and cycle on and improving physical and mental health through increased

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
of place and distinctiveness, reducing the need to travel by motorised transport.	to socialise, particularly on weekends.	Women					physical activity and social cohesion.
To contribute to safety and security and the perceptions of safety	<u>Crime reduction and community safety</u> Neutral impacts related to surveillance of illegal driving and other antisocial behaviour as the Proposed Changes will not introduce measures of relevance.	N/A	Low	Low	0 - Neutral	N/A	N/A
	<u>Reduction in Travel</u> Negative impact related to the fear of crime on public transport and London's streets may deter some people switching from vehicles to sustainable and active travel models, as such resulting in reduced access to opportunities or financial impact. However, in the medium-long term, this	Disproportionate impact on: Disabled people; Women; LGBTQ people; and Black, Asian and Minority ethnic people.	Low	Medium	-1 – Minor Negative	Medium	Measures are already in place for crime prevention such as CCTV coverage and patrolling of public transport by Metropolitan Police Service, British Transport Police and City of London Police. Policies such as the Mayor's Tackling Violence Against Women and Girls Strategy and the Women's Night Safety Charter are also in place. It is recommended that additional targeted campaigning be undertaken in relation to perceptions of safety on public

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
	impact is anticipated to reduce due to a transition to active travel.						transport for protected characteristic groups.
	<p><u>Coronavirus</u></p> <p>Disproportionate short-term impact upon people with underlying health conditions vulnerable to coronavirus travelling by public transport due to potential crowding at weekends.</p>	<p>Differential impact on:</p> <p>Disabled people;</p> <p>Older people;</p> <p>Black and ethnic minority people;</p> <p>Men;</p> <p>People living in socio-economically deprived areas; and</p> <p>Pregnant Women</p>	Low	Medium	-1 – Minor Negative	Short	<p>Measures are already in place such as an enhanced cleaning regime in stations and on public transport vehicles. Reduced capacity is in operation and social distancing is recommended where possible. In line with government guidance at the time of writing, from July 19 2021 use of face masks on public transport in London is mandatory unless exempt.</p> <p>It is recommended that targeted campaigning continue to be undertaken in relation to perceptions of safety on public transport in relation to coronavirus.</p>
	<p><u>Road traffic accidents</u></p> <p>Positive impact related to improvements in road safety as a result of a reduction in congestion.</p>	<p>Disproportionate impact on:</p> <p>Black, Asian and minority ethnic people;</p> <p>Older people;</p> <p>Disabled people; and</p>	Low	Medium	+1 - Minor Positive	Long	Measures are already in place to target speeding and other road safety issues, for example police enforcement and TfL campaigns and communication strategies.

IIA Objective	Description of Impact	Equality groups impacted disproportionately or differentially	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)	Duration (Short, Medium, Long)	Potential Mitigation/Enhancement (Brief description or 'Not Applicable')
		People living in deprived communities.					

7 Economy and Business

7.1 Overview of Assessment

The relevant IIA objective is 'To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economy providing opportunities for all.'

The assessment has been undertaken under three topics:

- Employment
- Businesses
- London's wider economy.

When considering the impact of the Proposed Changes, both direct and indirect effects need to be considered. Direct impacts are those which affect an individual who will have to pay a charge, where they would not before. This could affect, for example, an individual's effective return to labour by reducing the income they receive from working within the CCZ. Indirect impacts are those which affect businesses located within the CCZ, for example, due to an increase or reduction in patronage as a result of behaviour change prompted by the charge, brought about by the potential disincentive to travel caused by the Proposed Changes. There may be links between direct and indirect impacts and so it is important not to double count the impacts of the proposed changes.

It is also important to isolate the labour market and business segments which will be most affected by the Proposed Changes, and to understand the potential magnitude of impacts in the context of the total economic output of central London, and of London as a whole. Details of potential equality impacts (caused by certain population groups being more affected than others) are considered within Chapter 6.

The potential impacts will vary depending on vehicle type and journey purpose as discussed below.

Private Car Users

Individuals will be affected differently depending on the purpose of their trip, and time and day they travel. With the Proposed Changes individuals making leisure trips may decide the total cost of the activity is too expensive and so not make the trip. The impact of this is felt by service providers and is discussed in the 'Non-user Impacts' section below.

Individuals making business trips may be able to pass on the increased cost to customers. If this is the case, and the market is willing to pay the increased premium, then there is likely to be limited overall economic impact. Alternatively, they may absorb the increased cost into existing operational costs – in effect decreasing profit. It is necessary to understand the sorts of businesses that make use of private vehicles to understand whether the Proposed Changes are likely to have a material effect on the overall cost of service delivered.

The Proposed Changes affect both the hours of operation and the charging level compared to the situation before the temporary changes. Those individuals that travel in the CCZ on weekdays between 0700 and 1800 would already have paid the pre-pandemic charge of £11.50, and so will only be impacted by the proposed increase of £3.50 per day. However, a proportion of individuals may typically travel outside of the pre-pandemic charged hours, but within the proposed new charged hours during the weekend. These drivers will have to pay the full (increased) charge if they do not choose to alter their travel behavior. It should be noted that individuals that have been driving in the zone since the introduction of temporary changes in June 2020 will have been subject to charges from 7am to 10pm seven days a week. However, there will be some people who previously

travelled within the CCZ pre-the temporary changes who have not done so since who will be affected by the Proposed Changes.

The impact of the Proposed Changes on individuals who are commuting comes in two parts:

- Whether there is an alternative method of travel available to them (and if so what is the cost differential between the current car-based commute and the alternative method – either the ‘top-up’ differential between the current and proposed charge, or the full new charge amount)
- The impact to the individual of switching their method of commute.

The first is considered within this section, the second is an equalities issue and is primarily considered within Chapter 6, but also taken into account in this section.

Light Goods Vehicles

Light Goods Vehicles¹³ (LGV) users may also be able to pass on the increased cost to customers. If this is the case, and the market is willing to pay the increased premium, then there is likely to be limited overall economic impact. Alternatively, they may absorb the increased cost into existing operational costs – in effect decreasing profit. Some operators may also switch to vehicles that are eligible for the Cleaner Vehicle Discount (until December 2025).

Heavy Goods Vehicles

The process for the assessment of the impact on Heavy Goods Vehicles¹⁴ (HGV) trips is as for LGV trips.

Private Hire Vehicles

From an economic and business impact perspective it is key to understand whether the Proposed Changes will affect overall economic activity. There is the potential for Private Hire Vehicle operators/owners/drivers¹⁵ (PHV) and their customers to be impacted differently. From an economic and business impact perspective what is important is how the market as a whole responds to the Proposed Changes. The equalities implication for PHV drivers is dealt with in Section 6.

For this assessment we consider the potential impact on the PHV sector as a whole to assess the potential for trip suppression, and whether this will have a material impact on overall employment within the sector and affect other sectors.

Non-user Impacts

Businesses located within the CCZ might be impacted indirectly if patronage is increased or decreased, or if the cost of business increases due to the Proposed Changes. Direct costs to the business are considered within the sections described above. Businesses most likely to be adversely impacted are those where customers need to access the business by a chargeable vehicle and where alternative travel methods might not be attractive. As for business travellers who might be affected by the Proposed Changes, it is important to understand whether the Proposed Changes are likely to have a material effect on the overall cost of service purchased. Other businesses

¹³ Light commercial vehicles, under 3.5t gross weight. Commonly considered a “van”.

¹⁴ Rigid or articulated commercial vehicles over 3.5t gross weight. Commonly considered a “lorry”.

¹⁵ Private hire vehicles must be pre-booked via an operator and cannot use taxi ranks. It is illegal for PHVs to ply for hire.

may experience beneficial impacts if reduced congestion and the consequential improved walking environment leads to higher footfall and hence spend within the CCZ.

Potential Implications of the Coronavirus Pandemic

The impact of coronavirus is likely to include lower economic activity in central London due to the loss of businesses and employment in the hardest hit sectors of the economy. Moving forward, as lockdown measures continue to ease or be removed and activity increases there is considerable uncertainty about changes that may occur in transport use and travel demand. For example, it is unknown the extent to which home working by central London office workers will remain significantly different than pre-coronavirus, and for how long. These trends could have implications for the demand for the retail and hospitality sectors in the city centre. This could be compounded by the acceleration of the trend of moving more to on-line retail, which could reduce demand for London's bricks and mortar retail sector. With cycling provision improved during the pandemic we are also likely to see further increases in cycling demand. For example, cycle use within the CCZ at weekends has been running 2-3 times higher than pre-pandemic.

7.2 Business Impacts / Financial Costs to Users

TfL has undertaken analysis, using their suite of strategic transport models and bespoke road user charging tool, to forecast the impact that the Proposed Changes will have on travel patterns. This assessment has been undertaken using the 2031 outputs, as in absolute terms the impacts are greater (and therefore represent a 'worst-case scenario'. Had the 2021 data been used the outcome would have been the same (as, as a percentage the impacts are identical). Table 7-1 shows the forecast change in non-freight trips into the CCZ following the Proposed Changes. That is, car and PHV trips decline while trips by sustainable modes increase.

Table 7-1: Difference in the number of non-freight trips with the Scheme Proposed Changes compared to without them, 2031

	Time Period	Car (business)	Car (other)	PHV	PT	Cycle	Walk
Percentage Difference	weekday, 24 hours	-0.5%	-3.5%	-1.5%	0.2%	0.2%	0.2%
	weekday, 7am-6pm	-0.9%	-5.4%	-3.4%	0.3%	0.3%	0.3%
	weekend, 12-6pm	-3.8%	-23.1%	-10.9%	1.3%	1.1%	1.1%

The Proposed Changes have a small impact on the total number of trips into the CCZ and hence minimal economic impact in terms of economic activity whether that is employment or consumer spending. The mode shift that arises from the Proposed Changes will provide economic benefits as a result from reduced congestion and making central London more attractive for residents, workers and visitors. However, there is the potential that individual sectors of the economy could be impacted. As discussed above, these include those associated with the weekend economy.

Entertainment and Retail

The primary (non-employment) reasons for individuals to access the CCZ during proposed charging times at the weekend are entertainment and retail. Although, as a proportion, marginally more individuals use car or PHV to

access the CCZ during the proposed charged period on the weekend than during the charged period in the week, the significant majority of trips are made by active mode or by public transport (around 7.5 per cent of trips to the CCZ are made by private transport between 1200-1800 on a weekend, compared to 3.5 per cent between 0700-1800 on a weekday).

The change of the retail offer over the past 15 years means that it is no longer necessary to visit a specific store with a vehicle in order to make a purchase. The availability of cheap home delivery and delivery to local stores means that there is now limited need to drive within the CCZ on a weekend to access a specific store. Further a significant proportion of retail spend is made by foreign tourists, who are not entering the CCZ by car¹⁶. Individuals visiting the CCZ for retail purposes, who opt to travel by car, PHV or taxi and who are looking to make expensive purchases, are unlikely to change behaviour due to the Proposed Changes. It is considered likely that a relatively small proportion of those who drive and only make small purchases would also be unwilling to use a different method of travel. The loss of these individuals would impact the retail sector, but the expectation is that these are both small in number and also small in value to retailers and secondary industries. As such, this impact is expected to be minimal on the retail sector within the CCZ. Where car drivers trips switch to public transport or active modes, there could be increased footfall and spend¹⁷.

Travel to the West End is primarily made by public transport, or active modes. Previous research suggests that between 5 per cent¹⁸ (retail) and 11 per cent¹⁹ (for theatre visits) of trips to consumer activities within the West End are made by car. This supports the suggestion that the Proposed Changes are unlikely to have a material impact on the secondary industries within the area. Although the latter figure is from reports that are over 10 years old, in that time parking provision within the West End has reduced, and so it is reasonable to assume that the percentage of trips made by private vehicles has not increased.

Work undertaken by the GLA²⁰ looking at the relative proportion of worker and tourism spending within the CAZ²¹ suggests that annual spending by tourists is significantly larger than by workers, even when office-based spending is taken into account. Table 7-2 shows that for every £1 spent by office workers within the CAZ approximately £7 is spent by tourists.

Table 7-2: Annual spend by commuters and tourists within the CAZ (£bn)

Commuter Group	Value	Tourist Group	Value
London Commuters	£3.5	Domestic	£17.5
UK Commuters	£1.3	International	£15.7
Total	£4.8	Total	£33.2
Commuter Group	Value	Tourist Group	Value

Source: GLA Economics

By further reducing traffic levels in central London, the introduction of the Proposed Changes has the potential to make London a more attractive city for tourists and shoppers generally. There is a lack of detailed quantified

¹⁶ <https://data.london.gov.uk/dataset/lost-worker-tourism-expenditure-caz>

¹⁷ <https://tfl.gov.uk/info-for/media/press-releases/2018/november/getting-more-people-walking-and-cycling-could-help-save-our-high-streets#:~:text=The%20research%20has%20also%20found,each%20month%20than%20car%20drivers.>

¹⁸ https://www.london.gov.uk/sites/default/files/retail_wpa_retail_west_end.pdf

¹⁹ <https://www.london.gov.uk/questions/2005/1051>

²⁰ <https://data.london.gov.uk/download/lost-worker-tourism-expenditure-caz/fc2ba4eb-fec1-4671-b53e-bb7f02e97ca0/CAZ%20Analysis%20Briefing%20Note-final.pdf>

²¹ The CAZ includes the CCZ and some of the surrounding boroughs, as well as the north of the Isle of Dogs - <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/central-activities-zone>

research on the relationship between low car areas and tourist volumes, but studies undertaken by the European Union²² and by IIIIE²³ suggest anecdotally that the introduction of measures to reduce car access to a city centre is unlikely to have a negative impact on tourist numbers, and may in fact increase them. If this was to occur within central London it would help offset any decrease in spend by local residents / workers as a result of the scheme.

Overall, the expected impact on the weekend retail and leisure economy is defined as low as a result of the Proposed Changes.

Private Hire Vehicles Sector

The additional cost that will be incurred if a PHV driver must pay the Congestion Charge is £3.50 per weekday (£4.50 if they previously used Auto Pay) and £15 on Saturday and Sunday. The impact of the proposed changes on the PHV sector will depend on whether a PHV incurs the charge at all and, if so, the number of trips each charge payment can be spread over and the extent to which it can be passed on to passengers. A single owner / operator who enters the CCZ once a day (and cannot pass on the charge to passengers, or can pass it on only in part or for trips into the CCZ) may be more affected than a large operator who (if they desired) could spread the charge out over many trips. Table 7-3 shows the size of different operators within London (note that a driver may be employed by more than one operator). The licensing regime changed in 2017, requiring more detail from operators (the bands described as Tier 1 to 8 in the table). Most operators need to update their licence every 5 years, and so some operators are still categorised under the old system (the bands described as 'small' and 'standard').

Table 7-3: PHV operators by size, April 2021

PHV Operator Licence Type	PHVs	PHV Operators	%
Small	0-2 PHVs	181	9.29%
Standard	3+ PHVs	441	22.63%
Tier 1	0-10 PHVs	1021	52.39%
Tier 2	11-20 PHVs	141	7.23%
Tier 3	21-50 PHVs	104	5.34%
Tier 4	51-100 PHVs	48	2.46%
Tier 5	101-500 PHVs	7	0.36%
Tier 6	501-1,000 PHVs	1	0.05%
Tier 7	1,001-10,000 PHVs	3	0.15%
Tier 8	10,000+ PHVs	2	0.10%
	Total	1949	100.00%

Uber is one of the Tier 8 operators. It charges a flat fee for every trip through the CCZ (£1.50) irrespective of the time of day or day of week, and says that this is given to the driver. The driver is responsible for paying the daily Congestion Charge, but Uber's policy recognises that this is an additional cost and that charging a single user the

²² https://ec.europa.eu/environment/pubs/pdf/streets_people.pdf

²³ <https://lup.lub.lu.se/student-papers/record/8996627/file/8996628.pdf>

full Congestion Charge amount for a short trip might not be viable. Other large operators, including Bolt and Ola, operate very similar policies.

Implementing a scheme similar to Uber could be challenging for smaller operators though for long distance trips the overall cost increase associated with the Proposed Changes might be more easily accepted by passengers making occasional journeys. Concern was raised in the stakeholder engagement that the Proposed Change would accelerate the trend towards consolidation in the PHV sector thereby reducing competition.

Charging a £1.50 premium per trip, as Uber does, means that a driver needs to make 10 trips in the CCZ to cover the total cost on a Saturday or Sunday, or three trips to cover the increase during the week.

There is the potential for a negative impact to some drivers who are not able to change their fare tariffs at all (either increasing fares generally or passing on some or all of the Congestion Charge) in response to the Proposed Changes, with £15 possibly being the equivalent to the profit from several standard fares. There may be some increased demand for PHVs at weekends if people who previously drive into the CCZ in their own vehicles in switch modes including to PHVs.

The use of PHVs varies across London. The results of the 2017 PHV and Taxi Driver Diary Survey (Steer Davies Gleave, 2017²⁴) for PHV origins and destinations is shown in Table 7-4. Across the day, over 75 per cent of PHV trips do not enter the CCZ, while approximately 1 in 20 trips are entirely within the CCZ.

Table 7-4: Geographic spread of PHV trips, 2017

		Destination					
		Central	Inner	Outer	Heathrow	Outside	Total
Origin	Central	6%	7%	2%	0%	0%	15%
	Inner	6%	32%	5%	1%	1%	45%
	Outer	1%	5%	22%	1%	1%	29%
	Heathrow	0%	1%	0%	0%	0%	1%
	Outside	0%	0%	2%	0%	7%	9%
	Total	13%	45%	31%	2%	9%	100%

Source: PHV and Taxi Driver Diary Survey (Steer Davies Gleave, 2017)

²⁴ <http://content.tfl.gov.uk/driver-diaries.pdf>

Goods Vehicle Operators

As with PHVs, the impact on goods vehicles will depend on whether an operator is able to spread the charge over a wide range of consumers as well as the magnitude of the charge in comparison to the cost of the service being provided. The size of the operator will have an impact on this, as smaller operators (for instance those using their own vehicles as sole traders) may find the logistics of spreading the charge among a range of clients more difficult than larger operators (those running a fleet may be able to apply a small fee to all end users, and use this to pay the charge).

Stakeholders from the freight sector consider that the proposed increase in the Congestion Charge will negatively impact on a very low margin freight industry, for which many types of journey cannot be rescheduled to avoid the charge (e.g. delivery to construction sites). However, some stakeholders acknowledge there are benefits from reduced congestion for delivery vehicles within the CCZ.

Larger vehicles are already restricted in the hours they can enter the CCZ, under the London Lorry Control Scheme²⁵ (LCS). Under the scheme, vehicles over 18 tonnes may not enter the CCZ between 9pm and 7am Monday to Friday (including Friday night) and from 1pm Saturday to 7am Monday morning. Given that these restrictions are already in place (and so many larger vehicles already pay the charge), and that the charge is less than 7 per cent of the daily cost of running a large vehicle²⁶ (assuming 80,000 miles / year travel), the overall impact to this group of operators is expected to be small.

There is potential for operators of smaller vehicles (LGVs and smaller HGVs) to be more affected, as they are not impacted by the existing LCS. These operators may choose to run vehicles in the evenings or at weekends (rather than in the pre-pandemic charging periods) to avoid having to pay. For those vehicles that are subject to the LCS, there is only one hour on a Saturday (12-1) which would fall within the charging hours, and it is likely that most operators could amend their delivery schedules to avoid this.

Forecast changes in Goods Vehicle trips as a result of the Proposed Changes are shown in Table 7-5.

Table 7-5: Difference between the number of goods vehicle trips, with and without Scheme, 2031

	Time Period	LGV	HGV	Total
Percentage Difference	weekday, 24 hours	-0.5%	-0.5%	-0.5%
	weekday, 7am-6pm	-0.7%	-0.6%	-0.7%
	weekend, 12-6pm	-2.8%	-2.6%	-2.8%

For both LGV and HGVs, the reduction in trips across the week is less than 1 per cent. As before, the impact is larger at the weekend so there is the potential for certain sectors to be more adversely affected.

Reduced road congestion will lead to improved journey reliability, faster journeys and lower operating costs which will in part offset the direct financial impact of the Proposed Changes. Although individual operators may be affected, a change of this magnitude is likely to have a small impact on the goods vehicle sector within central London and so the overall impact of the Proposed Changes is expected to be minimal.

²⁵ <https://lcspermits.com/>

²⁶ <https://motortransport.co.uk/wp-content/uploads/2020/01/Binder1.pdf>

7.3 Impacts on London's Economy

One aspect of the reduction in trips associated with the Proposed Changes will be a decrease in journey time (due to a reduction in congestion) for those trips which remain. Table 7-6 shows the forecast time savings by vehicle type for different time periods in the 2030 reference case. The corresponding values as a result of the Proposed Changes are given in Table 7-7. Positive values represent the number of hours saved travelling.

Table 7-6: Travel time saving by time period, 2030 reference growth, hours saved by time period per day

Time Period	Car	PHV	LGV	HGV
weekday, 24 hours	2,402	579	249	70
weekday, 7am-6pm	1,807	554	256	62
weekend, 24 hours	8,927	1,307	186	51
weekend, 12-6pm	7,560	1,093	147	21

The reduction in the level of traffic reduces congestion and leads to reduction in journey time. The monetised values of the time saved is shown in Table 7-7:

Table 7-7: Value of travel time savings, daily, 2021 prices and values

Time Period	Car	PHV	LGV	HGV	Total
Weekday, 24 hours	£36,120	£8,706	£4,879	£1,389	£51,094
Weekday, 7am-6pm	£27,170	£8,329	£5,019	£1,221	£41,739
Weekend, 24 hours	£126,195	£18,480	£3,933	£1,006	£149,615
Weekend, 12-6pm	£106,861	£15,449	£3,098	£425	£125,833

It is estimated that nearly 37,500 hours of travel time will be saved per week due to the Proposed Changes. This is worth over £550k a week (2021 prices and values), or approximately £29m per year.

As shown in Table 7-8, in 2031 on average 135,000 users will enter the CCZ between 07:00 and 18:00 on weekdays and 68,000 will enter between 12:00 and 18:00 per day at the weekend. The additional payments arising from the Proposed Changes, also shown in Table 7-8, are based on an additional £3.50 per trip during the week and the full £15 per trip at the weekend. This table assumes that no vehicle entries are eligible for any exemption or discount.

Table 7-8: Daily trips made in newly charged periods, and additional payment, 2031 Reference Case Forecast

Time Period	Car	PHV	LGV	HGV	Total
Weekday, 7am-6pm	54,000	25,800	44,300	11,100	135,200

Additional Payment (£3.50 per day)	£189,000	£90,300	£155,050	£38,850	£473,200
Weekend, 12-6pm	46,800	14,800	5,700	1,000	68,300
Additional Payment (£15 per day)	£702,000	£222,000	£85,500	£15,000	£1,024,500

Paying the charge increases the cost of doing business. It either increases the spend required from the producer or increases the relative cost to the consumer. If this increase is small as a proportion of total output, then the scale of impact across London's economy will be low. Taking a worst case scenario that all vehicles (excluding taxis and buses) entering the CCZ are unique entries and are not eligible for any exemption or discount then this would equate to an increase in user charge payments of £230m in 2031, this equates to less than 0.5 per cent of total current overall Gross Value Added (GVA) of industries within the CAZ (approximately £147bn/year in 2018)²⁷, and less than 0.1 per cent of the total GVA of Greater London (£467bn in 2018). It is worth noting that in November 2019, pre-pandemic, around 30 per cent of unique vehicles detected each day have a discount or exemption for the Congestion Charge. All revenues raised by the Proposed Changes must by law be spent on measures which will directly or indirectly facilitate the implementation of the MTS.

The worst-case long-term London-wide economic forecast ('significant headwinds') suggests a reduction from pre-Covid baseline growth assumptions by at most 5 per cent to 2031²⁸. Even under this scenario, the total additional cost of the charge each year would still be only 0.1 per cent of the GVA of Greater London.

7.4 Conclusions

Overall, the impacts of the Proposed Changes on the performance of the economy of the CCZ and business within it is defined as low. This is discussed by impact area below.

Impacts on Employment

Given the relatively small number of workers within the CCZ who choose to travel to work by car or PHV and so might be impacted by the Proposed Changes, it is not expected that there will be a significant impact on employment as a result of the Proposed Changes. The level of impact is likely to be reduced further as a significant proportion of workers who travel by car or PHV to work will be doing so during the present temporary charging periods, and so will not be affected by the Proposed Changes.

As shown in Appendix E (Figure 10-21), of the 1.8 million people who work within the CCZ, only around 10 per cent travel to work by car, van, taxi or PHV and this number is likely to have declined since the 2011 census. Employees of sectors with a high presence of weekend work (those working in retail, accommodation and food services and arts, entertainment and recreation) have the potential to be most significantly affected. Workers in these sectors comprise approximately 17 per cent of jobs within the CCZ, with commuting patterns showing similarly low levels of car and PHV use – that is slightly less than 2 per cent of total jobs in the CCZ are in economic sectors with a high proportion of evening and weekend work and are undertaken by people who

²⁷ Arup, Gerald Eve, LSE (2021) The economic future of the Central Activities Zone
https://www.london.gov.uk/sites/default/files/caz_economic_future_emerging_findings_update15022021.pdf

²⁸ Arup, Gerald Eve, LSE (2021) The economic future of the Central Activities Zone Phase 2
https://www.london.gov.uk/sites/default/files/caz_economic_future_phase_2_report.pdf

commute by car or PHV. As such, the Proposed Changes are unlikely to have a significant impact on employment within the CCZ given the availability of public transport alternatives.

Impacts on Businesses

Forecasting undertaken suggests a reduction of approximately 1 per cent in people accessing the CCZ by car or PHV under the Proposed Changes. This is likely to overstate the total impact as some of these trips will now be undertaken by public transport and active modes. A reduction of this magnitude is unlikely to affect businesses, at an aggregate level, within the CCZ.

As with employment, there is the potential for certain sectors to be negatively impacted but there is also the potential, especially at weekends of positive impact. Retail, accommodation and food services and arts, entertainment and recreation have a larger presence in the weekend economies. Evidence suggests that relatively few people use cars or PHVs to access consumer activities (between 5 per cent and 11 per cent depending on the activity). While reduced traffic levels, especially at weekends, will improve the overall ambience of central London as well as facilitating the permanent reallocation of street for cyclists and pedestrians. These will lead to higher footfall and spending. The compound impact of the proposed changes, and the relatively small proportion of car and PHV trips, combined with the ability for some consumers to switch modes, and the improvement in the pedestrian environment means that the overall impact to business within the CCZ is likely to be neutral.

It is necessary to consider the interaction between businesses and employment. A business could be affected if the proposed change in charges affected its ability to employ workers, just as it would be if the number of customers it served reduced. The assessment of the Proposed Changes on employment suggests minimal impacts, and so it is not considered likely that business will be impacted in this manner.

Impacts on London's Wider Economy

Output within the CCZ contributes nearly £150bn / year to London's economy. In this context the impact of the Proposed Changes (~£230m / year) is small. Given the expectation that the scale of impacts on businesses and employment within the CCZ will be low, it is not expected that wider supply chains will be affected by the Proposed Changes, and so the overall impact on London's wider economy is expected to be neutral.

7.5 Summary

Table 7-9: Summary of the potential impacts of Proposed Changes to the Congestion Charge on London's Economy

IIA Objectives	Description of Impact	Duration (Short, Medium, Long)	Scale (Low, Medium, High)	Sensitivity (Low, Medium, High)	Impact Rating (Major, Moderate, Minor, Neutral)
Employment	Neutral impacts overall, with potential for minor impacts for some sectors (retail, accommodation and food services and arts, entertainment and recreation).	Medium	Low	Low	Neutral
Business	Neutral impacts, with potential for both minor and positive impacts for some sectors (retail, accommodation and food services and arts, entertainment and recreation).	Medium	Low	Low	Neutral
London's Wider Economy	Neutral impact expected to London's wider economy.	Long	Low	Low	Neutral

8 Summary of Impacts and Potential Mitigation

This section provides a consolidated list of existing and potential further measures to mitigate negative impacts identified in this report as well as potential enhancement measures which could support positive impacts arising from the Proposed Changes to the Congestion Charge.

A brief summary of each positive and negative impact and its overall rating is provided in the Table 8-1, alongside existing and potential further mitigation measures. Neutral impacts are only listed in this table where a potential enhancement measure has been identified.

Table 8-1: Existing and potential mitigation and enhancement measures

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation/Enhancement
Environment				
Air Quality	Minor reduction (approximately 1.5%) in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within central London.	+ 1 Minor Positive	ULEZ, LEZ	N/A
Climate Change	Minor reduction (approximately 1.5%) in annual emissions of CO ₂ within central London.	+ 1 Minor Positive	ULEZ, LEZ	N/A
People				
Air Quality, Health and Health Inequalities	Reduction in pollutant emissions leading to positive health outcomes particularly for people living in the boroughs within the CCZ.	+ 1 Minor Positive	ULEZ, LEZ	N/A
Connectivity	Increase in active travel in central London.	+ 1 Minor Positive	Streetspace schemes, Low Traffic Neighbourhoods	Further targeted roll out of existing measures.
	Improvement in bus journey times and reliability.	+ 1 Minor Positive	N/A	N/A

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation/Enhancement
	Potential increase in crowding on public transport.	-1 Minor Negative	N/A	N/A
Access to health and social care and other social infrastructure	Increased cost of access to healthcare during weekend charging hours for older people and disabled people unable to use public transport or active travel.	0 Neutral	Blue Badge holders can nominate up to two vehicles per day to receive 100% discount Designated Wheelchair Accessible PHVs and taxis remain exempt. Disabled tax class vehicle exemption NHS Patient Reimbursement Scheme	Raise awareness of eligibility for NHS Patient Reimbursement Scheme through NHS Trusts.
	Impact upon pregnant women accessing the CCZ who cannot use public transport or active travel for medical appointments.	0 Neutral	NHS Patient Reimbursement Scheme.	Clarify and communicate eligibility of pregnant women for NHS Patient Reimbursement Scheme through NHS Trusts.
	Increased cost of providing privately funded or voluntary care requiring access by private vehicle.	-2 Minor Negative	Residents discount (for those living in the CCZ) Blue Badge holders can nominate up to two vehicles per day to receive 100% discount	N/A
	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.	-1 Minor Negative	9+ seat minibus exemption Blue Badge discount Weekend parking exemptions for certain places of worship	TfL encourage faith organisations to consider 'shuttle services' to provide access into the CCZ for religious services.

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation/Enhancement
Accessibility	Increased costs for disabled drivers – particularly at weekends – who do not qualify for blue badge.	-1 Minor Negative	Designated wheelchair accessible PHVs and taxis remain exempt 2019 changes to Blue Badge eligibility for 'hidden' disabilities.	TfL to raise awareness of discounts available.
Access to work and training	Financial impact for people in low income jobs in retail, hospitality and leisure who need to travel to work by private transport during weekend charging hours.	-1 Minor Negative	N/A	N/A
	Increased costs to PHV drivers unable to spread additional costs across multiple trips.	-1 Minor Negative	Cleaner vehicle discount (until December 2025). Designated Wheelchair Accessible PHVs remain exempt. Blue Badge holders can nominate two vehicles to receive 100% discount.	N/A
Health and Health inequalities	Impact upon mental and physical health due to a reduction in traffic making the streets more attractive to socialise/walk/cycle on.	+1 Minor Positive	TfL and borough initiatives to improve streetspace for walking and cycling.	Further targeted roll out of active travel measures.
Social Integration	Financial impact on charities delivering mobile services (or requiring transportation of goods/equipment) to 'vulnerable'	-1 Minor Negative	N/A	Consider further reimbursement eligibility or exemption

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation/Enhancement
	people during weekend charging hours.			
Safety and Crime	Reduction in travel by individual with a fear for their safety on public transport, walking or cycling.	-1 Minor Negative	CCTV coverage and patrolling of public transport by Metropolitan Police Service, British Transport Police and City of London Police. Mayor's Tackling Violence Against Women and Girls Strategy Targeted campaigns such as tackling hate crime on the public transport network.	Additional targeted campaigning and outreach be undertaken in relation to perceptions of safety on public transport for community groups.
	Improvements in road safety as a result of a reduction in congestion.	+1 Minor Positive	Police enforcement and existing TfL campaigns and communication strategies.	N/A
Health and Health inequalities	Short-term impact upon people with underlying health conditions vulnerable to coronavirus travelling by public transport as they are not eligible for reimbursements.	-1 Minor negative	Enhanced cleaning regime in stations and on public transport vehicles. Targeted campaigning to continue to be undertaken in relation to perceptions of safety on public transport in relation to coronavirus.	N/A
Economy				
Employment	Neutral impacts overall, with potential for minor impacts for some sectors (retail,	Neutral	Placemaking, streetspace and active travel measures	Further enhancement of urban realm and provision for increase in active travel within central London

Theme / Topic	Description of Impact	Impact Rating	Existing Mitigation / Enhancement	Potential Further Mitigation/Enhancement
	accommodation and food services and arts, entertainment and recreation).			from public transport hubs to destinations.
Business	Neutral impacts overall, with potential for both minor negative and positive impacts for some sectors (retail, accommodation and food services and arts, entertainment and recreation).	Neutral	Placemaking, streetspace and active travel measures	Further enhancement of urban realm and provision for increase in active travel within central London from public transport hubs to destinations.

Potential Further Mitigation Measures

As shown in Table 8-1, there are a number of discounts, exemptions and reimbursements in place for the pre-pandemic Congestion Charge scheme that will remain in place and would mitigate the financial impacts associated with the implementation of the Proposed Charges on certain people and businesses travelling within the CCZ.

Additionally, wider TfL initiatives currently in place in relation to road safety and crime on public transport would mitigate the potential for negative impacts to arise as a result of a modal shift away from motorised transport.

However, there are several minor negative impacts identified in this report which may be reduced or avoided through the introduction of targeted further mitigation measures. The following potential further mitigation measures identified in Table 8-1 are in particular recommended for consideration by TfL:

- To reduce potential financial and accessibility impacts on disabled people accessing essential services and opportunities within the CCZ, it is recommended that TfL engage with disability groups to raise awareness of discounts available, and the extension of the Blue Badge scheme in England to people with 'hidden' disabilities in August 2019
- To reduce potential financial impacts on people with different religions or beliefs alternative who are not able or do not wish to use public transport or active travel to attend religious services within the CCZ, it is recommended that TfL encourage faith organisations to consider 'shuttle services' using 9+ seater minibuses to provide access into the CCZ for services during weekend charging hours
- To reduce potential financial impacts for people (particularly women, LGBTQ people, and black, Asian and minority ethnic people) who may be deterred from using public transport due to fear of crime, it is recommended that TfL undertake additional targeted campaigning in relation to perceptions of safety on public transport for these groups to alleviate concerns.

It is also considered that there may existing impacts from the pre-pandemic Congestion Charge on pregnant women, disabled people and older people requiring access to the CCZ for healthcare. The pre-pandemic scheme reimbursement criteria may not sufficiently cover women at advanced stages of pregnancy as it may be open to interpretation by healthcare professionals. The Proposed Changes offer an opportunity to review the existing

eligibility criteria and the way they are applied to pregnant women (and possibly other groups) and to consider how the reimbursements can be better communicated to service users.

Enhancement of existing TfL policies and initiatives

A number of positive impacts have been identified which would support or enhance current TfL policies.

The Proposed Changes may facilitate the future roll out of LTNs and streetspace schemes through reducing traffic on residential streets, making them more attractive and safer to walk and cycle on and improving physical and mental health through increased physical activity and social cohesion. Potential road safety improvements as a result of the Proposed Changes complement the MTS 'Vision Zero' policies, while reduced congestion in central London would support TfL bus reliability initiatives through reducing public transport journey times. Reduced congestion may also help.

Within central London this should help to facilitate improved active mode provision (i.e. walking and cycling facilities), specifically with respect to safe and attractive access to public transport hubs, for instance, by making some temporary streetspace schemes permanent, subject to consultation, to facilitate safe and convenient onward travel within the CCZ.

In terms of wider policy, reducing emissions within central London will contribute towards the UK's climate change targets, efficient freight objectives, air quality and carbon targets.

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10 Glossary, Abbreviations and Acronyms

Glossary

Term	Definition
Accessibility	The ease with which all passengers can gain access to TfL services.
Active, efficient and sustainable modes	Active, efficient and sustainable modes are defined in the Mayor's Transport Strategy as walking, cycling and public transport.
Base year	Year from which changes to transport demand are assessed.
Black, Asian and Minority Ethnic (BAME) people	In this classification, black, Asian and minority ethnic comprises all Mixed, Asian, Black and Other (non-white) ethnicities.
Connectivity	The general term for how easy it is for people to get to places, jobs, homes and services.
Congestion Charge	The London Congestion Charge is a fee charged on most cars and motor vehicles being driven within the Congestion Charge Zone in Central London at certain times of day.
Cumulative impacts	The assessment of cumulative impacts considers the effects of multiple projects (inter-project) and/or impacts of the Proposed Changes (intra-project) on receptors.
Differential impact	A differential equality impact is one which affects members of a protected group differently from the rest of the general population because of specific needs or a recognised sensitivity or vulnerability associated with their protected characteristic.
Disabled people	People who have, as defined by the Equality Act 2010, a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on a person's ability to do normal daily activities. The social model of disability defines disability as the effect of the barriers, discrimination and disadvantages faced by disabled people, not the impact of their specific impairment.
Disproportionate impact	A disproportionate impact can occur when a protected group is known to make up a greater proportion of the population than their representation in the wider local authority or employment sector; or, where an impact is predicted on a community resource or mode of travel which is heavily used by a protected group
Health determinant	Health determinants are the range of personal, social, economic and environmental factors which determine the health status of individuals or populations. A change to a single health determinant can affect the health status of different individuals or communities depending on their characteristics and sensitivity to change.
Health inequalities	Health inequalities are systematic, avoidable and unfair differences in mental or physical health between groups of people. These differences affect how long people live in good health and are mostly a result of differences in people's homes, education and childhood experiences, their environments, their jobs and employment prospects, their access to good public services and their habits.

Term	Definition
Health outcome	A health outcome is a change in the health status of an individual, group or population which is attributable to a planned intervention or series of interventions (e.g. the Proposed Changes).
Healthy streets approach	The Mayor and TfL's approach to prioritising people and their health in decision-making to create a healthy, inclusive and safe city for all. The approach makes London a more attractive place to walk, cycle and use public transport, and reduces the dominance of motorised transport.
Hybrid Forecast	A transport forecast by TfL which is an amalgamation of the five scenarios based on a rolling review to understand if features of the scenarios are more or less plausible as London recovers from the coronavirus pandemic.
Inclusive design	The creation of environments that everyone can use – confidently, independently and with choice and dignity – to access, and benefit from, the full range of opportunities available. Inclusive design avoids separation or segregation and is made up of places and spaces that acknowledge diversity and difference, meeting the needs of everyone in society.
Killed or Serious Injured (KSI)	A standard metric used to measure levels of road safety.
Low Emission Zone (LEZ)	A charging zone across most of Greater London for vehicles that do not meet emissions standards for particulate matter.
Macro-economic	Relating to the branch of economics concerned with large-scale or general economic factors, such as interest rates and national productivity.
Mitigation	Taking measures to reduce or remove identified impacts
Mode Share	The relative use of each mode of transport. The calculation of mode share in the strategy is based on trips.
Protected Characteristic Group (PCGs)	Defined in the Equality Act 2010. Specifically, the following equality groups are defined: age, disability, sex, race, pregnancy and maternity, gender reassignment, religion and belief, sexual orientation.
Public realm	The public realm is commonly defined as any space that is free and open to everyone. The London Plan describes it as 'the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.'
Public Sector Equality Duty	The public sector Equality Duty (PSED) is defined in Equality Act 2010 s 149. In summary, it requires public bodies in exercising their functions to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act, to advance equality of opportunity between persons who share certain protected characteristics and those who do not and to foster good relations between persons who share certain protected characteristics and those who do not.
Receptor	In this context, an element that is susceptible to being affected (either directly or indirectly) by the Proposed Changes, e.g. people living within the CCZ.

Term	Definition
Reference Case	A transport forecast by TfL that takes into account central macro economic forecasts representing the impact of the coronavirus pandemic, but does not assume any behavioural change.
Severance	The perceived division that can occur within a community when it becomes separated by a major traffic artery. It may result from the difficulty of crossing a heavily trafficked existing road or as a result of a physical barrier created by the road itself.
Social integration	The building of strong communities where all Londoners can lead interconnected lives and play an active part in their city and the decisions that affect them. This can only be achieved by working to prevent, identify and remove inequalities and barriers that prevent people from engaging in their communities and wider society, while recognising the important role played by interaction and participation in overcoming these.
Vision Zero	An approach to road danger reduction that works towards the elimination of road traffic deaths and serious injuries by reducing the dominance of motor vehicles on London's streets.

Abbreviations and Acronyms

Term	Definition
CCZ	Congestion Charge Zone
CO ₂	Carbon dioxide
EA	Environmental Assessment
EBIA	Economic and Business Impact Assessment
EQIA	Equalities Impact Assessment
GHG	Greenhouse gases
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
HUDU	Healthy Urban Development Unit
IIA	Integrated Impact Assessment
LES	London Environment Strategy
LEZ	Low Emission Zone
LGV	Light Goods Vehicle
LTN	Low Traffic Neighbourhoods
MTS	Mayor's Transport Strategy
NHS	National Health Service
NO _x	Oxides of nitrogen
PCG	Protected Characteristic Group
PHV	Private Hire Vehicle
PM ₁₀	Particulate matter less than 10µm in diameter

Term	Definition
PM_{2.5}	Particulate matter less than 2.5µm in diameter
ULEZ	Ultra Low Emission Zone
VKM	Vehicle kilometres

Appendix A. Relevant Policy and Legislation

A.1 Environment

Legislation, Plan or Policy	Relevance to the IIA
Environment Act 1995, Part IV ²⁹	Introduced a system of Local Air Quality Management (LAQM) in the UK. This requires local authorities to review and assess air quality within their boundaries regularly and systematically against Air Quality Objectives (AQOs) and to declare an Air Quality Management Area (AQMA) and make Air Quality Action Plans (AQAPs) to meet the AQOs, where these are exceeded. Where needed, the Mayor of London can (following consultation) use powers of direction to require boroughs to take steps to meet air quality objectives.
Air Quality (England) Regulations 2000 ³⁰ and Air Quality (England) Amendment Regulations 2002 ³¹	Set national AQOs for local authorities in England. AQOs exist for a variety of pollutants, including NO ₂ , PM ₁₀ and PM _{2.5} , for the protection of human health.
The Air Quality Standards (England) Regulations 2010 ³²	Transposed into English law the requirements of Directives 2008/50/EC ³³ and 2004/107/EC ³⁴ on ambient air quality, which set Limit Values for concentrations of pollutants in ambient (outdoor) air. Limit Values are defined for a variety of pollutants, including NO ₂ , PM ₁₀ and PM _{2.5} .
Mayor's Transport Strategy (MTS) (2018)	Under 'Improving air quality and the environment' Policy 6 of the MTS 2018 states that: <i>"The Mayor, through TfL and the boroughs, and working with stakeholders, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures may include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/levies, responsible procurement, the making of traffic restrictions/regulations and local actions".</i> Under 'Achieving a zero carbon city and good air quality', Policy 7 of the MTS states: <i>"The Mayor, through TfL and the boroughs, and working with stakeholders, will seek to make London's transport network zero emission by 2050, contributing towards the creation of a zero carbon city, and also to deliver further improvements in air quality to help meet tighter air quality standards, including achieving a health-based target of 10µg/m³ for PM_{2.5} by 2030. London's streets and transport infrastructure will be transformed to enable zero emission operation, and the switch to ultra low and zero emission technologies will be supported and accelerated".</i>

²⁹ <http://www.legislation.gov.uk/ukpga/1995/25/contents>

³⁰ <http://www.legislation.gov.uk/uksi/2000/928/contents/made>

³¹ <http://www.legislation.gov.uk/uksi/2002/3043/contents/made>

³² <http://www.legislation.gov.uk/uksi/2010/1001/contents/made>

³³ <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32008L0050>

³⁴ <https://eur-lex.europa.eu/eli/dir/2004/107/oj>

Mayor's London Environment Strategy (LES) (2018)	Objective 4.2 of the Mayor's London Environment Strategy is to " <i>achieve legal compliance with UK and EU limits as soon as possible, including by mobilising action from London boroughs, government and other partners</i> ", whilst Objective 4.3 is to " <i>establish and achieve new, tighter air quality targets for a cleaner London by transitioning to a zero emission London by 2050, meeting world health organization [WHO] health based guidelines for air quality</i> " and Objective 6.3 is " <i>a zero emission transport network by 2050</i> ".
Climate Change Act 2008 ³⁵	<p>Through the Climate Change Act 2008, as amended by the 2050 Target Amendment in June 2019, the UK Government has committed to:</p> <ul style="list-style-type: none"> ▪ reduce GHG emissions by at least 100% of 1990 levels (net zero) by 2050; and ▪ contribute to global emission reductions, to limit global temperature rise to as little as possible above 2°C. <p>To meet these targets, the UK Government has set five-yearly carbon budgets, which currently run until 2032. They restrict the amount of GHG the UK can legally emit in a five-year period (expressed as tonnes of carbon dioxide equivalent (CO₂e)). In December 2020, the Committee on Climate Change published its recommendation for the 6th UK carbon budget³⁶, which is the first budget to be published on a trajectory towards 'net zero'. At the time of writing, however, this budget was yet to be formally adopted into UK law.</p>

A.2 People

Legislation, Plan or Policy	Relevance to the IIA
The GLA Act 1999 (section 33)	Requires the Mayor and Greater London Authority (GLA) to put in place procedures to have 'due regard' and promote equality of opportunity in relation to the formulation and implementation of mayoral strategies. EQIA is an important tool in achieving this.
Equality Act (2010)	The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society, places duty on public authorities to pay 'due regard' to actively tackling all forms of discrimination, harassment and victimisation, promote equality of opportunity and good relations.
Mayor's Transport Strategy (MTS) (2018)	<p>The MTS sets out the Mayor's policies and proposals to achieve the vision to '<i>create a future London that is not only home to more people, but is a better place for all of those people to live in</i>' (p.19). The Strategy sets three key themes using the Healthy Streets Approach to achieve this vision:</p> <ol style="list-style-type: none"> 1) Healthy streets and healthy people; 2) A good public transport experience; and 3) New homes and jobs <p>The health and economic benefits of active travel, including reducing the burden on the NHS, are a strong focus of the MTS. The Strategy also seeks to</p>

³⁵ https://www.legislation.gov.uk/ukdsi/2019/9780111187654/pdfs/ukdsiem_9780111187654_en.pdf

³⁶ <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

	create “a good public transport experience” with ambitions to improve the safety, affordability, accessibility and inclusivity of public transport in London.
Mayor’s London Environment Strategy (LES) (2018)	The strategy recognises that air and noise pollution, the threat to green spaces and the adverse effects of climate change all pose major risks to the health and wellbeing of Londoners, particularly those living in the most deprived areas. The strategy sets out proposals for strategies and investment to deliver sustainable growth, improve health and reduce inequalities. Part of the strategy is a commitment to improving pollution and air quality in London through encouraging cleaner vehicles and encouraging uptake of active travel (Greater London Authority, 2018).
The Marmot Review: Fair Society, Healthy Lives (Marmot et al, 2010) Health Equity in England: The Marmot Review 10 Years On (The Health Foundation, 2020)	The Marmot Review (2010) set out a life course framework for tackling health inequalities in England. The review ‘sets out a framework for action under two policy goals: to create an enabling society that maximizes individual and community potential; and to ensure social justice, health and sustainability are at the heart of all policies. and aims to support healthy communities’ (Local Government Association, 2021). The Marmot Review ‘10 years on’ report shows that, in England, health is getting worse for people living in more deprived districts and regions, health inequalities are increasing and, for the population as a whole, health is declining.
Healthy Streets for London Framework (2017)	The MTS uses the Healthy Streets Approach (TfL, 2017), which makes health and personal experience the priority in transport plans for the city. There are 10 healthy streets indicators, and those considered relevant to the Health and Equalities Impact Assessment are as follows: <ol style="list-style-type: none"> 1) Pedestrians from all walks of life; 2) Easy to cross; 3) Places to stop and rest; 4) Not too noisy; 5) People choose to walk, cycle and use public transport; 6) People feel safe; 7) People feel relaxed; 8) Clean air.
The London Health Inequalities Strategy (2018)	The London Health Inequalities Strategy sets out a vision for making London a healthier, fairer society, with all Londoners having the best opportunities to live a long life in good health. The Strategy highlights the ‘stark’ health inequalities which can be seen by the differences in life expectancy in certain parts of the city compared to others. The Strategy gives key aims for reducing health inequalities in London.
The City of London Noise Strategy (2016 – 2026)	The City of London Noise Strategy combines and updates policies and programmes that are already in place to manage and mitigate noise in London. The Noise Strategy includes new measures to work alongside existing approaches to improve the management of the acoustic environment in London. The following aspects are considered within the strategy: <ul style="list-style-type: none"> ▪ Noise associated with new developments ▪ Noise associated with transport and street works ▪ Noise complaints from residents, visitors and businesses ▪ Protecting and enhancing the acoustic environment and soundscape

Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy (2018)	Inclusive London is the Mayor's Equality, Diversity and Inclusion Strategy, which seeks to achieve greater fairness and equality for people in London. The Strategy outlines long-term strategic objectives relating to equality, diversity and inclusion of groups protected by the Equality Act 2010 but also wider issues such as low-income Londoners, young people in care, care leavers, single parents, migrants and refugees. Of relevance to the CCZ, a series of objectives are orientated around improving accessibility, inclusivity, safety and affordability of transport in London (Greater London Authority, 2018).
The London Plan (2021)	The London Plan is the Mayor's Greater London Authority Spatial Development Plan (SDS) which outlines an integrated economic, environmental, transport and social framework for the development of London over a 20-25 year period (2019-2041). The Plans vision seeks to promote <i>Good Growth</i> which balances the following objectives which should be taken into account by all planning and development in London: <ol style="list-style-type: none"> 1) GG1 Building strong and inclusive communities; 2) GG2 Making the best use of land; 3) GG3 Creating a healthy city; 4) GG4 Delivering the homes Londoners needs; 5) GG5 Growing a good economy; and 6) GG6 Increasing efficiency and resilience.
Action on Equality – TfL's commitments to 2020 (2016)	Action on Equality sets out TfL's commitments to promoting equality for customers, staff and stakeholders, in compliance with the Equality Act 2010. The vision for Equality and Inclusion outlined is that ' <i>every person matters in keeping London moving, working and growing</i> ' (p.15), with actions proposed based on this vision, objectives and policies. Action on Equality outlines a series of TfL equality objectives which demonstrate the improvement TfL seek to make to the equality of transport.

A.3 Economy

Legislation, Plan or Policy	Relevance to the IIA
The London Plan (2021)	The London Plan identifies the specific issues associated with future development within the Central Activities Zone ("Taking account of the dense nature of the CAZ, practical measures should be taken to improve air quality [...] and to address issues related to climate change and the urban heat island effect" (pp.85)), while maintaining the need to enhance the provision and attractiveness of office space with the Central Activities Zone (CAZ) by "improvements to walking, cycling and public transport connectivity and capacity" (pp.254, also discussed on pp.86), and that "London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management [and that] [t]he special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure [...] should be conserved, enhanced and promoted". (pp. 288).

	<p>Thirteen different strategic functions of the CAZ are detailed (pp. 87). The following are nine considered most relevant for understanding the economic and business impacts the CC.</p> <ul style="list-style-type: none"> a) Agglomerations of nationally and internationally significant offices and company headquarters connected with finance, business, professional bodies, associations and institutions b) Uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance c) Centres of excellence for higher and further education and research d) Centres of medical excellence and associated specialist facilities e) Legal establishments of regional, national and international importance f) Arts, culture, leisure, entertainment and activities and areas of regional, national and international importance g) Retailing, including specialist outlets, of regional, national and international importance h) Tourism facilities including hotels and conference centres i) Specialist creative clusters. <p>The London Plan requires that any development plan or associated policy change appropriately balances the strategic functions of the CAZ. It also notes the importance of the night time economy within the CAZ and highlights the need to “promote the night-time economy [...] particularly in the Central Activities Zone,” “improve access, inclusion and safety, and make the public realm welcoming for all night-time economy users and workers” and “ensure night-time economy venues are well-served with safe and convenient night-time transport” (pp. 318)</p> <p>Such provision needs to meet with the Mayor’s strategic target for “80 % of all trips in London to be made by foot, cycle or public transport by 2041” (pp.416).</p>
<p>The Mayor’s Economic Development Strategy (EDS) (2018)</p>	<p>Sets out approach to facilitating ongoing sustainable economic growth in London, including the need to apply the healthy streets approach, reduce car dependency and transition to a low carbon economy. There is a focus on improving public realm and making walking and cycling to economic centres more appealing, and on reducing traffic levels and improving air quality to reduce the economic strain that ill health has on productivity within the city. Economic growth linked with development, and associated land use or policy change, needs to fit within the framework set out in the London Plan.</p> <p>The EDS considers the different forms of economic centres within London, noting that the Central Activity Zone (CAZ) differs significantly from the surrounding town and village centres. The CAZ accommodates over 30% of London’s Jobs and generates 10% of UK output – the EDS recognises the need to protect and enhance the unique functions of the CAZ, so that businesses and workers continue to be attracted to it.</p>

<p>The Mayor's Transport Strategy (MTS) (2018)</p>	<p>The MTS defines the link between the approach to future transport provision with London and the conditions which will allow London's economy to flourish. It recognises the need to connect business to each other, and to their customers and workers, while facilitating 'good growth' – i.e. growth which is sustainable and healthy for Londoners. Relevant policies, which may be impacted by the proposed CC and also impact on the economy and businesses, include:</p> <ul style="list-style-type: none"> a) 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 % of all trips in London to be made on foot, by cycle or using public transport by 2041. b) Policy 2: The Mayor, through TfL and the boroughs, and working with stakeholders, will seek to make London a city where people choose to walk and cycle more often by improving street environments, making it easier for everyone to get around on foot and by cycle, and promoting the benefits of active travel. c) 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 % by 2041. d) Policy 10: The Mayor, through TfL and the boroughs, and working with stakeholders, will use the Healthy Streets Approach to deliver coordinated improvements to public transport and streets to provide an attractive whole journey experience that will facilitate mode shift away from the car. e) Policy 17 The Mayor, through TfL and the boroughs, and working with stakeholders, will seek the use of the full potential of the Thames to carry passengers, to integrate river services with the public transport system, walking and cycling networks, and to enable the transfer of freight from road to river in the interests of reducing traffic levels and the creation of Healthy Streets. f) Policy 19 The Mayor, through TfL and the boroughs, and working with stakeholders, will seek the development of London's public transport services to support the growth of the night-time economy.
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Appendix B. Assessment Methodologies

B.1 Environment

B.1.1 Approach

The impact on the environment has been assessed by estimating changes in emissions of air pollutants and greenhouse gases which have the potential to occur as a result of the Proposed Changes. In order to do this, road traffic derived emissions of oxides of nitrogen (NO_x), particulate matter (PM₁₀ and PM_{2.5}) and carbon dioxide (CO₂) were estimated based on modelled vehicle kilometres (vkm) travelled per year by different vehicle classes (i.e. cars, LGVs, PHVs and HGVs), both 'with' and 'without' the Proposed Changes. Emissions associated with each vehicle type were calculated using vehicle specific emission factors derived by TfL, in order to account for London specific vehicle composition projections.

B.1.2 Scope

Emissions of air pollutants and CO₂ have not been estimated outside of central London, as the Proposed Changes are expected to have a relatively minor impact on traffic flows and therefore emissions outside of the CCZ. Likewise, the assessment has focussed on road traffic emissions, as emissions from other sources are unlikely to be affected by the Proposed Changes. TfL bus, taxi, motorcycles, coaches and specialist vehicle emissions have also not been estimated as these are considered unlikely to be substantially affected by the Proposed Changes.

Road traffic emissions (in tonnes per year) were estimated both on an annual basis and over specific time periods to illustrate the varying influence of the Proposed Changes on emissions. The following time periods were considered:

- Annual
- Weekday, 7am-6pm
- Weekend, 12pm-6pm.

Emissions were estimated for the following scenarios:

- The 2016 base year (consistent with the base year of the 2019 London Atmospheric Emissions Inventory (LAEI))
- 2021 Reference Case (without the Proposed Changes)
- 2021 Reference Case (with the Proposed Changes)
- 2021 Hybrid (without the Proposed Changes)
- 2021 Hybrid (with the Proposed Changes)
- 2031 Reference Case (without the Proposed Changes)
- 2031 Reference Case (with the Proposed Changes)
- 2031 Hybrid (without the Proposed Changes)
- 2031 Hybrid (with the Proposed Changes).

B.2 People (Health and Equalities)

Introduction

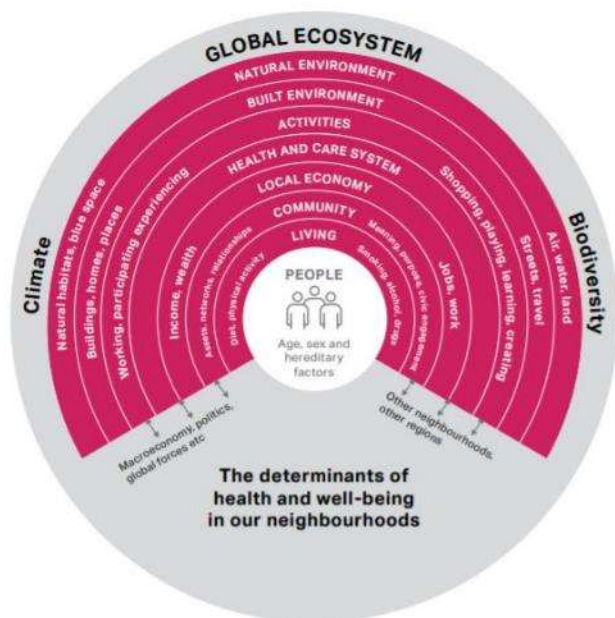
The 'People' theme of the IIA encompasses both 'Health' and 'Equalities'. Due to the close inter-relationship between health and equality, these two elements have been combined into a single 'Health and Equalities Impact Assessment'. The population deemed to be affected by the Proposed Changes comprises the communities within the CCZ as well as people in Inner and Outer London who may be accessing the CCZ for work or other reasons. The aim of the Health and Equalities Impact Assessment is to assess the potential positive and negative impacts on the health and wellbeing of the affected population, in particular on PCGs, and identify the potential for inequalities to arise as a result of the Proposed Changes.

In this context, inequalities includes social, economic, and environmental inequalities, all of which are interlinked and play a part in determining the health status of an individual or population. As set out in the Marmot Review (2010, p.16): *'social inequalities in health arise because of inequalities in the conditions of daily life and the fundamental drivers that give rise to them: inequities in power, money and resources.'* Key examples of factors that can give rise to health inequalities include education and employment, income and wealth, and the neighbourhoods that people live in, which may have higher or lower levels of air quality and noise pollution than others. These factors are also closely linked to health-related behaviours such as peoples' level of physical activity. These circumstances have the potential to be shaped through policy; for example, protecting the environment by reducing air pollution will contribute to improving health and reducing health inequalities (Greater London Authority, 2018).

There is a strong body of evidence documenting the interlinkages between inequalities and health outcomes and the Marmot Review (2010, p.15) concluded that *'reducing health inequalities is a matter of fairness and social justice'*.

For the purpose of this assessment, the social, economic and environmental inequalities that could arise as a result of the Proposed Changes have been considered within the framework of health determinants, as set out by Barton and Grant (2006) Figure 10-1).

Figure 10-1: Determinants of health and well-being (Barton and Grant 2006)



Within London, overall health is improving across a range of factors, yet inequalities persist. Changes to transport policies provide an important opportunity to influence the health and wellbeing of people in London, due to the close links between traffic flows and travel modes and resulting impacts on health. The Mayor's 'Healthy Streets for London' Framework has set out indicators related to how changes to the path and road network can improve the health of people living in the city, with many of these indicators having the potential to be affected by the Proposed Changes.

Figure 10-2: Healthy streets indicators (Transport for London, 2017)



Public Sector Equality Duty

Equalities Impact Assessment (EQIA) is an effective mechanism for helping TfL, as a public body, to demonstrate how it is meeting Public Sector Equality Duty duties within the Equality Act 2010 (and duties to promote equality of opportunity in the GLA Act 1999 (as amended)) when developing policy and proposals. The EQIA identifies any potential disproportionate³⁷ or differential³⁸ impacts from implementation of the proposed measures on Protected Characteristic Groups (PCGs) as defined in the Equality Act as well as on social and economically deprived communities and low-income Londoners. The policy and legislative context in relation to the Health and Equalities Impact Assessment is set out in Appendix A.

Summary of relevant guidance

In development of the methodology and assessment for the IIA, cognisance has been given to the recently published human health guidance from the International Association for Impact Assessment (IAIA) and European Public Health Association 'Human Health: Ensuring a High Level of Protection' (IAIA 2020). The NHS Healthy Urban Development Unit's (HUDU) Rapid Health Impact Assessment Tool (London HUDU, 2009) was used for scoping the health determinants to be included in the assessment. The HUDU tool was revised in January 2013 to take into account new legislation and policy changes both nationally and in London related to health and spatial planning, including the findings of the Marmot Review and the Healthy Streets principles.

In relation to assessing potential impacts on PCGs, technical guidance on the Public Sector Equality Duty for England published by the Equality and Human Rights Commission (EHRC) (2014), as well as good practice from previous TfL EQIAs/IAs has been used to inform the assessment.

Scoping

As part of the scoping exercise, the MTS IIA objectives were mapped against the MTS IIA topics to identify which determinants of health – linked to inequalities, as discussed above – should be scoped in or out of the assessment, based on the potential for these objectives to be realised as a result of the implementation of the charges. The NHS Healthy Urban Development Unit's (HUDU) Rapid Health Impact Assessment Tool (London HUDU, 2019) was then used to refine the focus of the IIA topics specifically in relation to potential impacts on health and equalities, and identify any additional aspects not covered by the IIA objectives. Potential topics for inclusion within the scope were considered in relation to how impacts may be experienced by PCGs as well as by the general population. The IIA objectives considered applicable to the HIA and EQIA are listed in Table 10-1.

³⁷ A disproportionate impact can occur when a protected group is known to make up a greater proportion of the population than their representation in the wider local authority or employment sector; or, where an impact is predicted on a community resource or mode of travel which is heavily used by a protected group.

³⁸ A differential equality effect is one which affects members of a protected group differently from the rest of the general population because of specific needs or a recognised sensitivity or vulnerability associated with their protected characteristic.

Table 10-1: Mapping to determinants of health from MTS IIA objectives and topics

Overarching Objectives	MTS IIA Objective	MTS IIA Topic	HUDU Rapid Health Impact Assessment Tool Determinants
<p>To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities</p> <p>To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.</p>	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure	Air quality	Air quality, noise and neighbourhood amenity
	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	Noise	
	To maximise accessibility ³⁹ for all in and around London	Accessibility	Accessibility and active travel
	To enhance and improve connectivity ⁴⁰ for all to and from and within and around London and increase the proportion of journeys made by sustainable and active transport modes	Connectivity	Access to health and social care services and other social infrastructure
	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	Social Integration	Social cohesion and inclusive design
	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness, reducing the need to travel by motorized transport	Design	
	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economy providing opportunities for all	Employment	Access to work and training
	To contribute to safety and security and generate the perceptions of safety	Safety and Crime	Crime reduction and community safety

³⁹ The ease with which all passengers can gain access to TfL services.

⁴⁰ The general term for how easy it is for people to get to places, jobs, homes and services.

Taking cognisance of both the MTS IIA Topics and the HUDU Rapid Health Assessment Tool, the key determinants for consideration in relation to potential impacts on health and equalities are as follows:

- Air quality
- Noise
- Accessibility, connectivity and active travel
- Access to health and social care services and other social infrastructure
- Access to work and training
- Social integration and inclusive design
- Crime reduction, community safety and road traffic accidents.

Anticipated health and equality impacts relating to physical activity in open space are addressed in the assessment under 'Accessibility, Connectivity and Active Travel.'

The following determinants, although important for health and equality, were 'scoped out' of the IIA as they were not anticipated to be affected by the Proposed Changes, as follows:

- Housing design and affordability
- Access to open space and nature
- Access to healthy food
- Minimising the use of resources.

The topic of 'climate change' is assessed as part of the Environmental Assessment and is scoped out as having potential for indirect health and equality impacts. It is considered that any impacts on climate change which do arise as a result of the Proposed Changes would be positive, though minor (refer to Section 5 - Environment), and therefore unlikely to have a perceptible impact on health and/or PCGs.

The health and equalities determinants identified in the scoping exercise and taken forward for impact assessment are subsequently referred to as 'Health and Equalities IIA Topics'.

General Methodology

The Health and Equalities Impact Assessment draws on the outputs from the Environment Assessment and Economic and Business Impact Assessment. Interdependencies with the other IIA themes are illustrated in Figure 3-1. In addition, the Health and Equalities Impact Assessment utilises data collected through desk-based research and information provided by TfL.

The assessment is qualitative and identifies potential significant health and equalities impacts using professional judgement and evidence from the latest publicly available literature on the relationship between transport, health, and inequalities, and outputs from the other parts of the IIA as described above.

Due to the close inter-relationship between health and equalities, the two topics have been considered together within the IIA. Where there are potential equalities impacts unrelated to health, for example in relation to economic impacts on PCGs, these are reported separately.

The assessment of Health and Equalities IIA Topics and how the Proposed Changes perform in relation to the MTS objectives takes into consideration duration, scale, and sensitivity and are reported in terms of the potential for an impact (Positive, Negative, Neutral or Uncertain) – or change in health outcome⁴¹ – to arise, and whether

⁴¹ The term 'health outcome' refers to the health status of an individual, group or population attributable to a planned intervention (e.g. the Proposed Changes).

there is potential for a disproportionate or differential impact PCGs as well as on social and economically deprived communities and low-income Londoners.

Geographical Scope

The Health and Equalities Impact Assessment considers impacts occurring within the CCZ, however recognises that these impacts may be experienced by people travelling to and from the CCZ for work, services, or leisure, as well as residents within the CCZ.

For certain impacts, it is noted that people living in boroughs within the CCZ may experience a greater scale of change in their environment, particularly in relation to direct health impacts from reduced noise levels and improved air quality. Particular focus has therefore been given to the following boroughs: Westminster, Camden, Lambeth, Southwark, Tower Hamlets, City of London, Islington, and Hackney (see Figure 3-2).

Similarly, certain impacts relate only to the CCZ, such as road safety improvements within the boundary area. However, it is recognised that people living in other areas of London also travel within and around the CCZ, and potential for indirect health and equality impacts on the wider population and PCGs has been considered. As such, health profile data has been gathered for all London boroughs. An assessment of impact upon PCGs and low-income Londoners that travel within and around the CCZ has also been undertaken.

Baseline Data

The baseline for the Health and Equalities Impact Assessment has been developed through data collected from desk-based sources including a review of scientific journals and research, policy documents and emerging evidence, and additional information provided by TfL. Baseline data has been gathered in relation to health profiles in London, the proportion of different PCGs present within the geographic areas described above, and the travel characteristics of PCGs and low income Londoners. Key health inequalities within London have also been identified.

Baseline data to inform the Health and Equalities Impact Assessment has been compiled from the following sources:

- Office for National Statistics (ONS)
- London Data Store
- Index of Multiple Deprivation (IMD)
- Public Health England Fingertips Tool
- Mayor of London statistical reports
- London Travel Demand Survey
- Travel in London (Annual Reports)
- Travel in London: Understanding our diverse communities (2019).

Baseline data relating to health and equalities is set out in Appendix E: People Baseline.

Health and Equalities IIA Topics

As shown in Table 10-2, the methodology of the Health and Equalities Impact Assessment varies depending on the Health and Equalities IIA Topic.

Table 10-2: Health and equalities assessment topic methodology

Health and Equalities IIA Topics	Methodology
Air quality	<p>The assessment has considered the potential positive and negative health effects related to asthma, lung disease, and other respiratory and circulatory effects associated with forecast changes in traffic emissions. This analysis is based on the quantitative data received from the air quality modelling outputs provided by TfL and assessed under the Environment theme. These data are available in relation to changes in pollutant emissions within the CCZ so impacts on specific sensitive locations (e.g. schools, care homes) and on people within the CCZ have not been assessed. However, the results of the Mayor's audit of air pollution in primary schools and nurseries has also been utilised, to identify those which fall within areas that are forecast to experience a reduction in emissions.</p> <p>Effects of a change in air quality on specific vulnerable populations have also been considered, including black, Asian and minority ethnic people, older and younger people, pregnant women, disabled people, and low income communities.</p>
Noise	<p>Noise may be influenced by any forecast changes in traffic flows within and around the CCZ. As no separate noise modelling has been undertaken, analysis has been necessarily high-level and based on professional judgement using available baseline data related to the noise environment and traffic flows, and comparing this with the future year traffic scenarios provided by TfL. Previous noise monitoring studies undertaken by TfL in relation to the original Congestion Charges have also been considered.</p> <p>Effects on population sub-groups have been considered, including low income communities who may be disproportionately affected by a change in noise levels.</p>
Access to health and social care services and other social infrastructure	<p>There may be impacts on community access to services particularly for service vehicles and for access to services for vulnerable groups. The health effects of this issue have been considered via examination of the potential effects of the Proposed Changes on the major health centres and education facilities in the CCZ as well as mobile care services.</p> <p>The analysis has focussed on changes to accessing health or social resources due to the financial impact of the Proposed Changes and access restrictions (for those both travelling to receive health services or travelling to provide care via vehicle) or economic effects, particularly for vulnerable people.</p>
Accessibility, connectivity and active travel	<p>This topic has assessed the effects on active travel and connectivity within the CCZ due to changes in amenity and accessibility and the potential indirect impacts on human health from an increase in physical activity.</p> <p>Quantitative data on changes in the number and type of transportation trips and changes in the length of trips from the baseline year and future year scenarios has been utilised to determine the potential for an increased uptake of active travel as a result of the charges.</p>

Health and Equalities IIA Topics	Methodology
	<p>Effects of any potential changes to physical activity due to increased uptake of active travel and improved amenity – as a result of safety improvements, reduced severance and better air quality – has been analysed qualitatively based on any studies that have been done to date.</p> <p>Potential negative impacts on accessibility to the CCZ for those PCGs unable to use active travel or public transport – such as older people and disabled people – have also been considered.</p>
Social integration and inclusive design	<p>The potential for the Proposed Changes to act as a conduit in improving social integration and access to community facilities within the CCZ, through driving inclusive design and reducing severance, has been assessed. While it is recognised that the Proposed Changes themselves do not constitute a change in road/street design, it was considered that they could have a positive indirect impact on public realm⁴² and provide new opportunities for placemaking.</p> <p>The potential for the Proposed Changes to impact on the operations of charitable organisations that provide services and assist vulnerable people with integrating into the community has also been considered.</p> <p>Existing levels of social cohesion have been identified as far as possible, through use of the IMD and other relevant baseline sources. Effects of any potential changes to social integration have been assessed qualitatively, and where available informed by relevant data from community surveys or studies on the effects of the CCZ to date.</p>
Access to work and training	<p>Changes in access to work and training opportunities within the CCZ that could arise from the financial burden associated with the Proposed Changes and the indirect impact they have on health and equality have been considered.</p> <p>This topic utilises the outputs of the EBIA and relevant surveys or findings of studies associated with the CCZ in terms of behaviour modifications and economic effects. Potential impacts have been discussed in relation to specific employment sectors and population sub-groups likely to be affected, and any specific effects on particular PCGs which may arise.</p>
Crime reduction, community safety and road traffic accidents	<p>Changes and/or perceived changes in safety and crime within the CCZ associated with the Proposed Changes have been assessed qualitatively, as has the potential for people to feel unsafe using public transport and PHVs/taxis due to long term coronavirus concerns or fear of being attacked (based on survey evidence where available).</p> <p>Additionally, the effect of the Proposed Changes on 'Vision Zero for London' – the goal that by 2041 all deaths and serious injuries will be eliminated from London's transport network – has been considered. Baseline data regarding road traffic accidents within the CCZ has been assessed qualitatively against the predicted change in traffic flows as a result of the Proposed Changes and studies relating to road safety in central London have also been considered.</p>

⁴² The **public realm** is commonly defined as any space that is free and open to everyone. The London Plan describes it as 'the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.'
https://www.london.gov.uk/sites/default/files/mdag_agenda_public_london.pdf

Health and Equalities IIA Topics	Methodology
	The potential for disproportionate effects on vulnerable groups and PCGs associated with safety and crime has been considered.

In addition to potential disproportionate or differential impacts on health, equality aspects are cross cutting across the other IIA elements. PCGs have potential to be differentially or disproportionately affected by the environmental, economic, health, crime and safety and accessibility topics. The PCGs considered in the IIA in relation to health and economic impacts are outlined in Table 10-3. Protected Characteristics related to marriage and civil partnership have been scoped out of this assessment as it is anticipated that the Proposed Changes are not of relevance to this PCG. In addition, while it is not formally a PCG under the Equality Act 2010, socio-economic deprivation has also been considered and is explained below.

Table 10-3: Protected characteristic groups considered in the IIA

Protected Characteristic Group	Definition
Age	This refers to persons defined by either a particular age or a range of ages. This assessment considers effects for school age (0-17), young people (18-25), older people (60+ and 75+).
Disability	A disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities. Although this assessment refers to disabled people as one group, it is acknowledged that this covers a wide range of people who are disabled in different ways and includes those with hidden disabilities.
Gender reassignment	This refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity.
Pregnancy and maternity	The EQIA considers effects for pregnant women and mothers of new babies. The impact on this group is related to their requirements for access to medical services and pre and/or post-natal care within the CCZ, in addition to health impacts of air pollution.
Race	The Equality Act defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins. The assessment considers effects for relevant groups, following the ONS terminology used in the 2011 Census ⁴³ . Reference is made to Black, Asian and Minority Ethnic people (black, Asian and minority ethnic) more generally, where the effects relate to a number of groups in relation to this protected characteristic.

⁴³ Census 2011 categories are White or White British people (English, Welsh, Scottish, Irish, Northern Irish, Gypsy or Irish Traveller, Other White); Asian or Asian British people (Indian, Pakistani, Bangladeshi, Chinese, Other Asian); Black or Black British (African, Caribbean); Mixed Race (White and Black Caribbean, White and Black African, White and Asian, White Other); and Other Ethnic Groups (Arab or Other groups).

Protected Characteristic Group	Definition
	The assessment considers the impacts of the CCZ measures upon the different races, particularly considering methods of travel used and location.
Religion or belief	Religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief. The assessment considers effects for relevant groups, following ONS terminology for religious affiliation ⁴⁴ as well as for relevant sub-groups of main religious groups.
Sex	This refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives.
Sexual orientation	Sexual orientation refers to whether a person's sexual orientation is towards their own sex, the opposite sex or to both sexes.
Socio-economically deprived people	<p>Socio-economic deprivation relates to a person's social and economic position in relation to others, based on income, education and occupation. It is not a protected characteristic as defined by the Equality Act 2010. The impacts on deprived or disadvantaged communities and people on low incomes (less than £20,000 per year) will be related to their ability to access employment and essential services and well as impacts on their health.</p> <p>Poor health is linked to high levels of unemployment and lack of access to education, therefore contributing to socio-economic deprivation. Socio-economically deprived groups are more likely to be employed in jobs that are required to work shifts at weekends – i.e. hours which were previously not subject to the Congestion Charge.</p>

Assumptions / Limitations

The health and demographic profile created for the London boroughs is based on data collection from secondary sources. Whilst these sources will provide general population data in the London boroughs and on vulnerable groups and PCGs, the data gathered and the assessment undertaken is at a population level. The ability to assess at the level of population sub-groups as set out in Table 10-3 has been dependent on the availability of travel data for the different groups.

The coronavirus pandemic has led to over a hundred thousand premature deaths in the UK with thousands more seriously ill. At the time of undertaking the human health assessment, the full implications on the physical and mental health of London's population and different PCGs (and socio-economic deprivation) within it, as a result of the pandemic are not yet known. Some initial analysis has been undertaken by the Greater London Authority in relation to socio-economic inequalities and coronavirus and the relevant demographic data. Studies have been referenced where pertinent to the assessment.

It should be noted that the health profile data gathered for this assessment is primarily from pre-2020; therefore this assessment does not take into account coronavirus statistics in the health baseline. However, it is understood that the traffic forecasts (Hybrid scenario) data for 2031 take account of the likely long-term implications of the pandemic for travel behaviour.

⁴⁴ Census 2011 religious affiliation main categories are Christian, Buddhist, Hindu, Jewish, Muslim, and Sikh.

During stakeholder engagement it was raised that the diversion or re-routing of vehicles to avoid paying the Congestion Charge may increase ambient noise and air quality impacts for residents outside the CCZ. Data was not available for purposes of this IIA to assess whether traffic may be displaced to Inner and Outer London from the CCZ as a result of the Proposed Changes, and if such a displacement could result in changes in pollutant emissions or noise levels. Therefore, it was not possible to assess the potential for health impacts as a result in changes of pollutants and noise levels in Inner and Outer London. The assessment has focussed on the potential changes in pollutants as a result of the Proposed Changes within the CCZ and it is assumed that other mayoral policy interventions aimed at facilitating mode shift and reducing congestion would address any potential displacement effects on air quality and noise, and as a result perceptible impacts on health and equalities in these areas would be unlikely to occur.

B.3 Economy and Business

Introduction

The MTS defines the link between the approach to future transport provision within London and the conditions which will allow London's economy to flourish. It recognises the need to connect businesses to each other, and to their customers and workers, while facilitating 'good growth' – i.e. growth which is sustainable and healthy for Londoners. This is reiterated in the Mayor's Economic Development Strategy (EDS), which also recognises the need to protect and enhance the unique functions of the CAZ, so that businesses and workers continue to be attracted to it. So, the starting point for the assessment was that if the Proposed Changes make it difficult or unattractive for businesses within the CCZ this could have a detrimental effect on its output and stifle 'good growth'.

The primary effects of the Proposed Changes will be felt within the CAZ itself, and a review of the potential impacts here formed the core of this assessment. Consideration was also given to the total level of change in user charging as a proportion of economic output, and the relative impact that this might have on the wider London economy.

Although there will be individual economic areas (or businesses) which are impacted by the proposed change, the focus of this assessment is what the impacts are likely to be at a macro level, in terms of: (a) employment and business output within the CAZ; and (b) the potential for significant secondary market impacts, for example in supply chains, or as a result of reduced accessibility.

Methodology

There is no legislative framework for conducting an EBIA hence the approach taken is a pragmatic one to identify any material impacts that may occur due to the proposed changes. In particular impacts on: employment; small and medium sized enterprises; and London's economy as a whole. As the proposed changes are broadly in line with the present Temporary Changes it is expected any potential impacts will mainly occur in relation to the evening economy and retail and leisure activities at the weekend. This is due to the daytime charging regime being well established with no negative material economic impacts being identified during its operation.

The approach was, therefore, to assess the scale and nature of the retail and evening economies within the CCZ, in terms of employment and in relation to the size of London's overall economy. The next stage was to determine the proportion of those participating and working within these sectors who presently travel into the Congestion Charge area by car using previously published research. For those participating in the evening economy - the potential additional charge will be put into the context of typical expenditure for a night out, while for those working - it will be compared against average wage levels.

For commercial and PHV impacts we reviewed TfL ANPR data on movement into the CCZ by vehicle type and by time of day to ascertain what the impact of the present temporary changes have had on vehicle movements. This included a review of potential secondary market impacts caused by a potential reduction in availability of PHVs, and how PHV operators might look to mitigate the Proposed Changes.

This assisted in determining the potential impact of the proposed charge against the context of the size of London's economy. Account was also taken of the economic costs of congestion which the proposed measures seek to reduce. This was done by comparing the expected traffic flows with and without the Proposed Changes.

Scoping

This assessment is divided into three topic areas:

1. Employment impacts within the CCZ – these impacts are considered in broad employment terms, with sectors which are particularly vulnerable to impact considered separately. Impacts are considered at the broad sectoral level
2. Business Impacts within the CCZ - these impacts are considered across the economy as a whole, with sectors which are particularly vulnerable to impact considered separately. Impacts are considered at the broad sectoral level
3. Wider London economic impacts – the overall impact of the proposed changes is considered in terms of the total output from within the CAZ and across Greater London, to make an assessment as to whether there is the potential for wider economic impacts as a result of the proposed changes to the CCZ.

Impacts within individual sectors, although potentially large within that sector, need to be considered within the wider context of the assessment being undertaken. If employment is able to transfer from one sector to another (assuming relative productivity is unchanged) then the overall economic impact of the proposed changes will be small.

For instance, within the PHV and taxi market, PHV and taxi trips make up only a relatively small proportion of total highway trips to the CAZ (less than 10 per cent total trips). Further as a proportion of total PHV and taxi trips the number of trips made to the CAZ is low. This means that changes will only impact a small percentage of entries to the CCZ and a small percentage of PHV / taxi operators. As such, although considered at an aggregate level, a detailed review of the impact of Proposed Changes within the PHV and taxi sector is not proportionate for the purpose of the EBIA.

The potential impact in secondary markets caused by people potentially not being able to access work, or any knock-on costs to businesses within the CCZ is of more relevance to assessment of the broad economic impacts of the Proposed Changes.

The specific impact within the PHV sector, and the potential for the impact within the PHV sector to affect individual population groups is discussed within the EQIA section.

Approach

Using observed and forecast traffic data and employment and business data the potential impacts to the economy were identified – in terms of impacts to employment and broad sector business impacts. The outcomes of this assessment were tested and validated through stakeholder engagement.

The ranges for assessment of the magnitude of impacts is given in Table 10-4. An increase in employment from 100 people to 110 people would be assessed as a moderate positive impact, whereas an increase in costs to businesses (as a percentage) of output of 4 per cent would be assessed as a minor negative impact.

Table 10-4: Economic and business impact magnitudes

Scale of Overall Impact	Rating	Impact Level (as a % change from baseline)
+3	Major positive	>10%
+2	Moderate positive	+5 % to +10%
+1	Minor positive	+2 to +5%
0	Neutral	+2% to -2%
-1	Minor negative	-2% to -5%
-2	Moderate negative	-5% to -10%
-3	Major negative	<-10%

The assessment of the sensitivity of an impact to the changes is assessed qualitatively as 'Low', 'Medium' or 'High'.

Baseline Data Sources

The following is a list of data sources used for this assessment:

1. ONS travel to work data
2. TfL Model outputs
3. NOMIS output data
4. London Data Store economic activity data
5. ANPR data.

Assumptions and Limitations

It is assumed that traffic data forecasts provided by TfL give an accurate representation of the impact of the Proposed Changes. Further it is assumed that the impact of coronavirus does not have a structural impact on the economy within central London, and so that current broad market conditions are appropriate for use when assessing the impact of the Proposed Changes.

Appendix C. Environment Baseline

C.1 Data Sources

Baseline air quality conditions within the study area have primarily been established using outputs from the London Atmospheric Emissions (LAEI) 2016 ⁴⁵, specifically:

- Mapped concentrations of NO₂, PM₁₀ and PM_{2.5} across Greater London in µg/m³.
- Emissions of NO_x, PM₁₀, PM_{2.5} and CO₂ (in tonnes/year) for 2016 for different source categories within Central, Inner and Outer London, respectively
- The estimated proportion of the population exposed to an annual average NO₂ concentration above the AQO of 40µg/m³, within Central, Inner and Outer London respectively, based on modelled 2016 ground level concentrations.

Projected roadside NO₂ concentrations for a 2018 reference year ⁴⁶ have also been mapped across the study area for 2021 and 2030 in order to illustrate the geographical location of any projected exceedances of the annual mean EU Limit Value across central London.

C.2 Baseline Conditions

Figure 10-3, Table 10-5, Figure 10-4 and Figure 10-5 below illustrate modelled 2016 annual mean NO₂, PM₁₀ and PM_{2.5} concentrations across Greater London, respectively, which indicate that:

- Annual mean NO₂ concentrations exceeded the level of the annual mean AQO across Central London and areas of Inner and Outer London, in particular next to busy roads. In terms of human exposure to NO₂, the data in Table C.1 indicates that in 2016 100 per cent of the population in Central London were exposed to annual mean NO₂ concentrations above the AQO, reducing to 48 per cent in Inner London and 3 per cent in Outer London.
- Annual mean PM₁₀ concentrations were within the AQO across Greater London.
- Annual mean PM_{2.5} concentrations were within the AQO (25 µg/m³) across Greater London but exceed the World Health Organisation (WHO) guideline value of 10 µg/m³.

⁴⁵ <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2016>

⁴⁶ <https://uk-air.defra.gov.uk/library/no2ten/2020-no2-pm-projections-from-2018-data>

Figure 10-3: Modelled 2016 annual mean NO2 concentrations across greater London

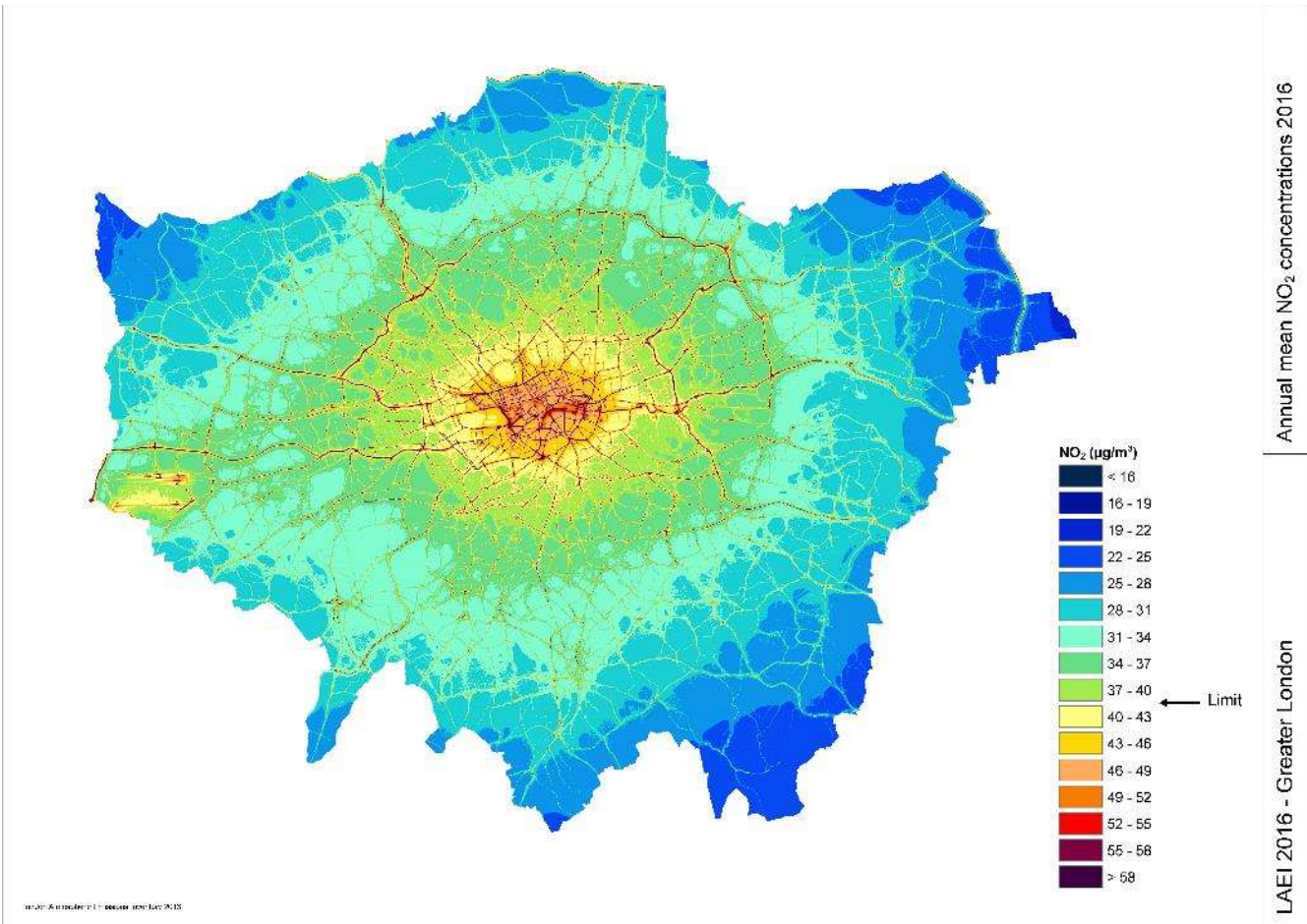


Table 10-5: Proportion of population exposed to annual average NO2 concentration above AQO

Year	Central	Inner	Outer
2016	100%	48%	3%
SOURCE: London Atmospheric Emissions Inventory 2016			

Figure 10-4: Modelled 2016 annual mean PM10 concentrations across greater London

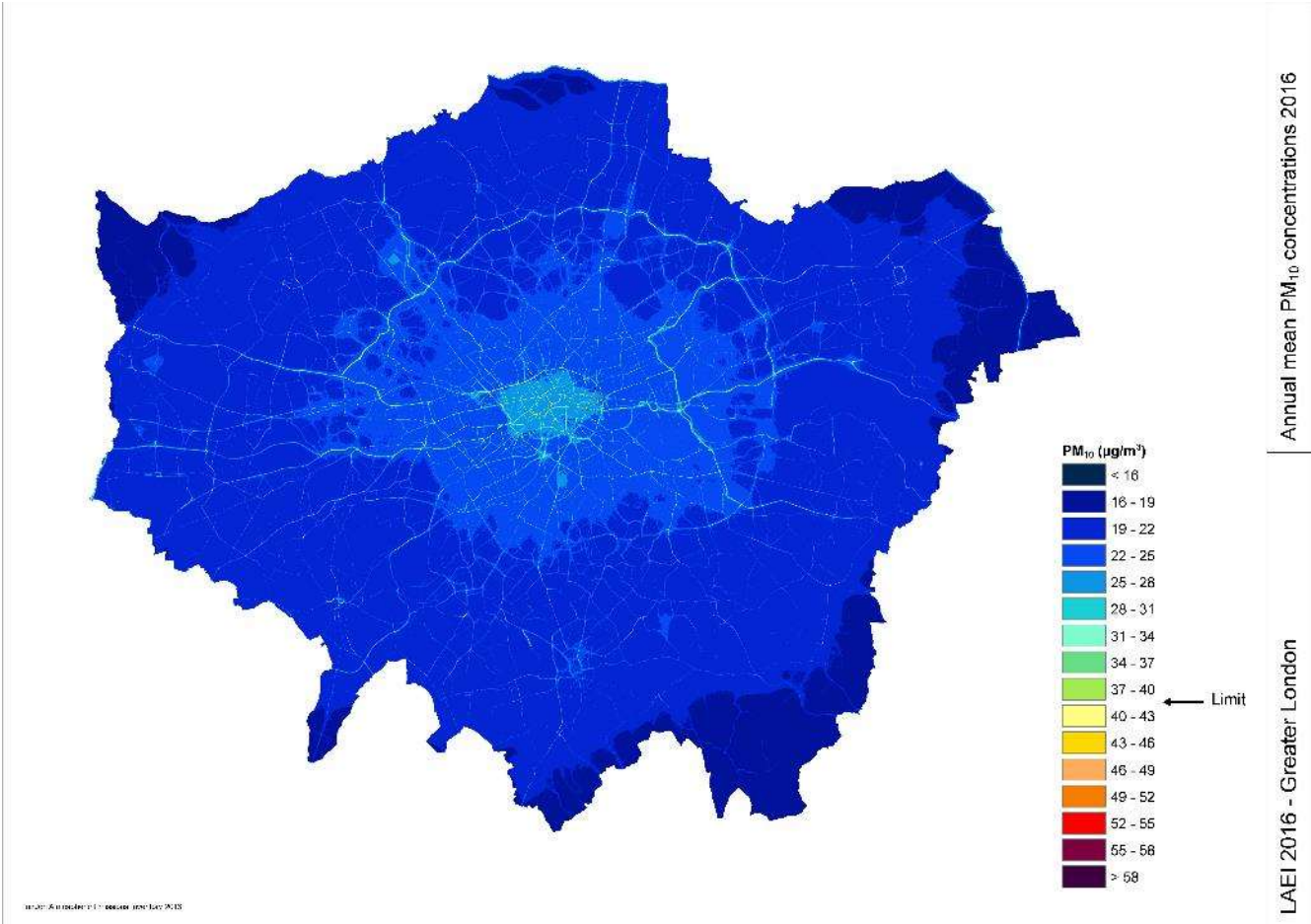


Figure 10-5: Modelled 2016 annual mean PM_{2.5} concentrations across greater London

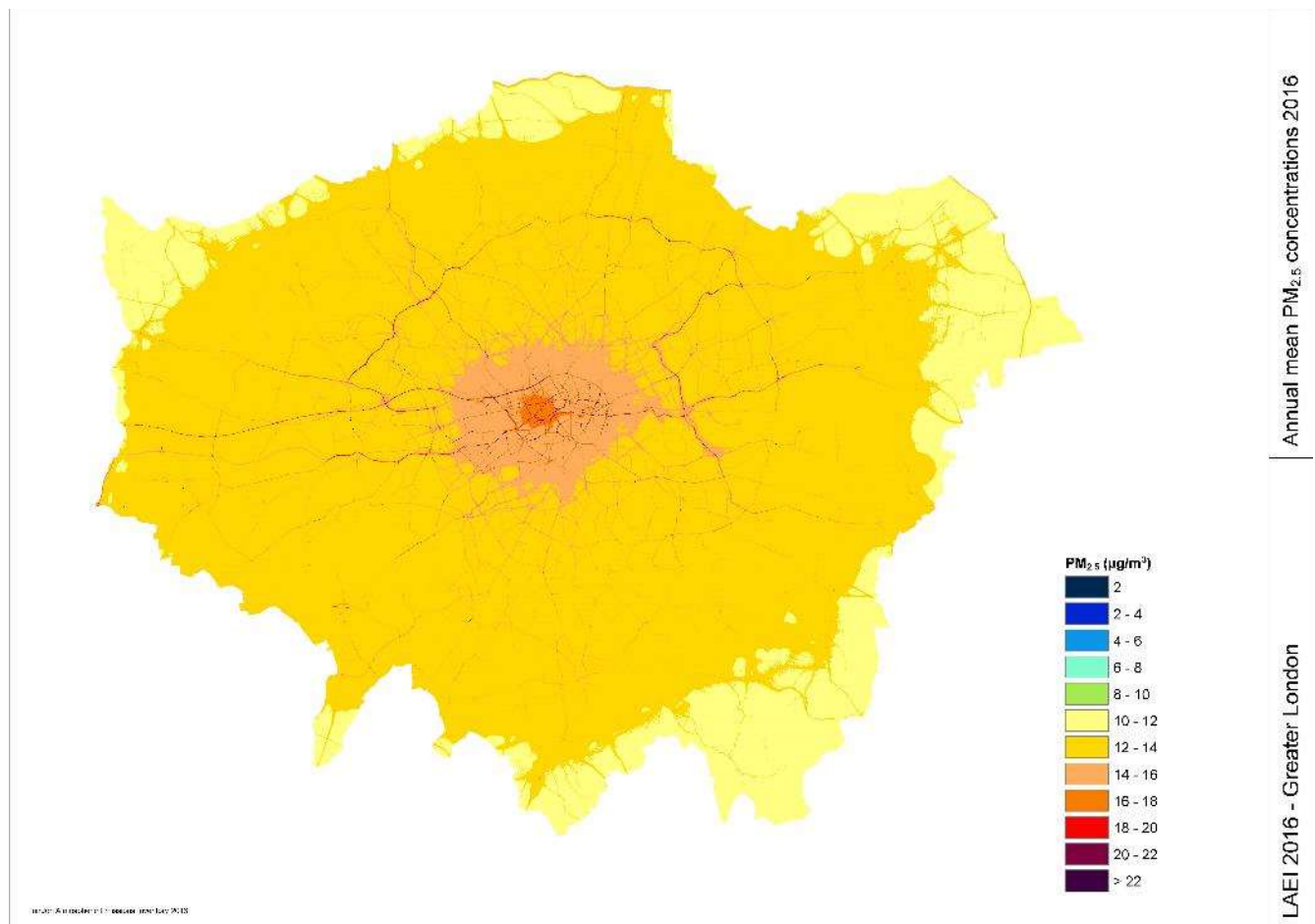


Table 10-6 to Table 10-9 summarise estimated emissions of NO_x, PM₁₀, PM_{2.5} and CO₂ in 2016 within Central, Inner and Outer London, respectively.

These data indicate that:

- In 2016, road transport is estimated to have contributed 41 per cent, 51 per cent and 48 per cent of total NO_x emissions in Central, Inner and Outer London, respectively
- In 2016, road transport is estimated to have contributed 19 per cent, 26 per cent and 27 per cent of total PM₁₀ emissions in Central, Inner and Outer London, respectively
- In 2016, road transport is estimated to have contributed 20 per cent, 29 per cent and 32 per cent of total PM_{2.5} emissions in Central, Inner and Outer London, respectively
- In 2016, road transport is estimated to have contributed 22 per cent, 28 per cent and 28 per cent of total CO₂ emissions in Central, Inner and Outer London, respectively.

Proposed Congestion Charge Changes Integrated Impact Assessment

Table 10-6: Estimated 2016 NOx emissions in greater London (tonnes / year)

Source	Central London	Inner London	Outer London
Domestic	43.3	860.5	1,788.7
Industrial and Commercial	1,154.3	4,116.9	8,416.0
Miscellaneous	1.1	15.0	65.9
Aviation	7.9	319.0	3,668.8
Rail transport	3.5	277.3	629.3
River transport	216.9	260.4	205.0
Road transport	975.9	6,179.6	13,699.3
Total	2,402.8	12,028.7	28,473.0
SOURCE: London Atmospheric Emissions Inventory 2016			

Table 10-7: Estimated 2016 PM10 emissions in greater London (tonnes / year)

Source	Central London	Inner London	Outer London
Domestic	4.5	195.2	608.1
Industrial and Commercial	260.7	1,118.6	2,393.3
Miscellaneous	3.4	28.3	69.2
Resuspension	37.9	284.5	723.4
Aviation	0.0	3.9	64.2
Rail transport	0.2	17.6	41.2
River transport	6.1	7.7	6.7
Road transport	74.1	580.0	1,458.3
Total	386.9	2,235.8	5,364.4
SOURCE: London Atmospheric Emissions Inventory 2016			

Table 10-8: Estimated 2016 PM2.5 emissions in greater London (tonnes / year)

Source	Central London	Inner London	Outer London
Domestic	4.5	195.0	607.5
Industrial and Commercial	168.7	508.9	905.7
Miscellaneous	3.2	24.6	54.7
Resuspension	1.4	10.4	26.7
Aviation	0.0	3.5	52.6

Proposed Congestion Charge Changes Integrated Impact Assessment

Source	Central London	Inner London	Outer London
Rail transport	0.2	15.7	36.9
River transport	5.8	7.3	6.4
Road transport	44.6	316.0	788.3
Total	228.4	1,081.5	2,478.6
SOURCE: London Atmospheric Emissions Inventory 2016			

Table 10-9: Estimated 2016 CO₂ emissions in greater London (tonnes / year)

Source	Central London	Inner London	Outer London
Domestic	119,920	2,447,140	4,861,012
Industrial and Commercial	723,146	1,981,527	5,428,125
Aviation	1,624	85,375	953,801
Rail transport	242	25,722	55,414
River transport	13,320	17,930	12,843
Road transport	241,813	1,786,558	4,497,519
Total	1,100,065	6,344,252	15,808,716
SOURCE: London Atmospheric Emissions Inventory 2016			

Figure 10-6 and Figure 10-7 below illustrate projected annual mean roadside NO₂ concentrations (for a 2018 reference year)⁴⁶ for 2021 and 2031, respectively, which indicate that the annual mean NO₂ Limit Value (40 µg/m³) is currently exceeded adjacent to a number of road links in Central London, but is expected to be achieved by 2030.

Figure 10-6: Projected annual mean roadside NO₂ concentrations in central London (2021)

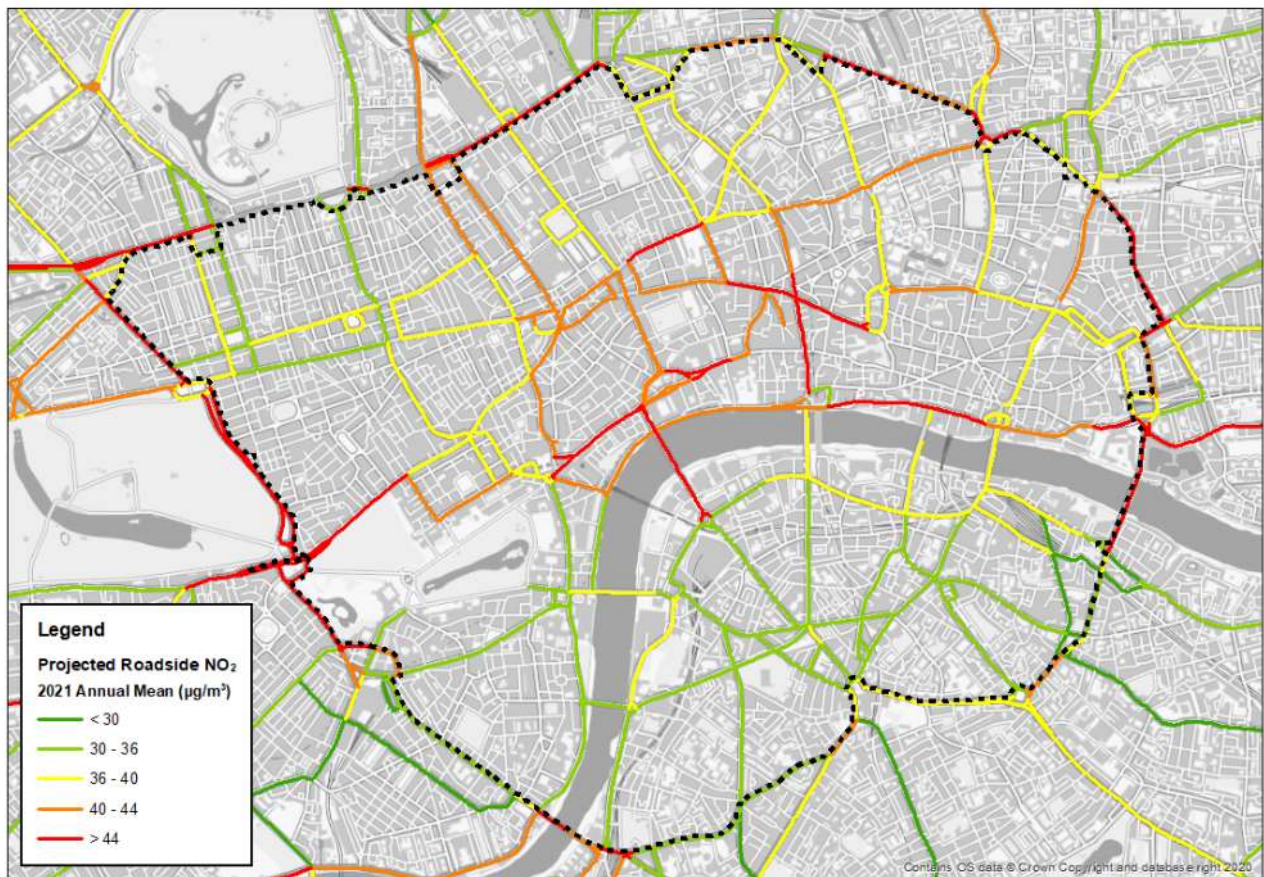


Figure 10-7: Projected annual mean roadside NO₂ concentrations in central London (2030)



C.2.1 Impacts of London Ultra Low Emission Zone

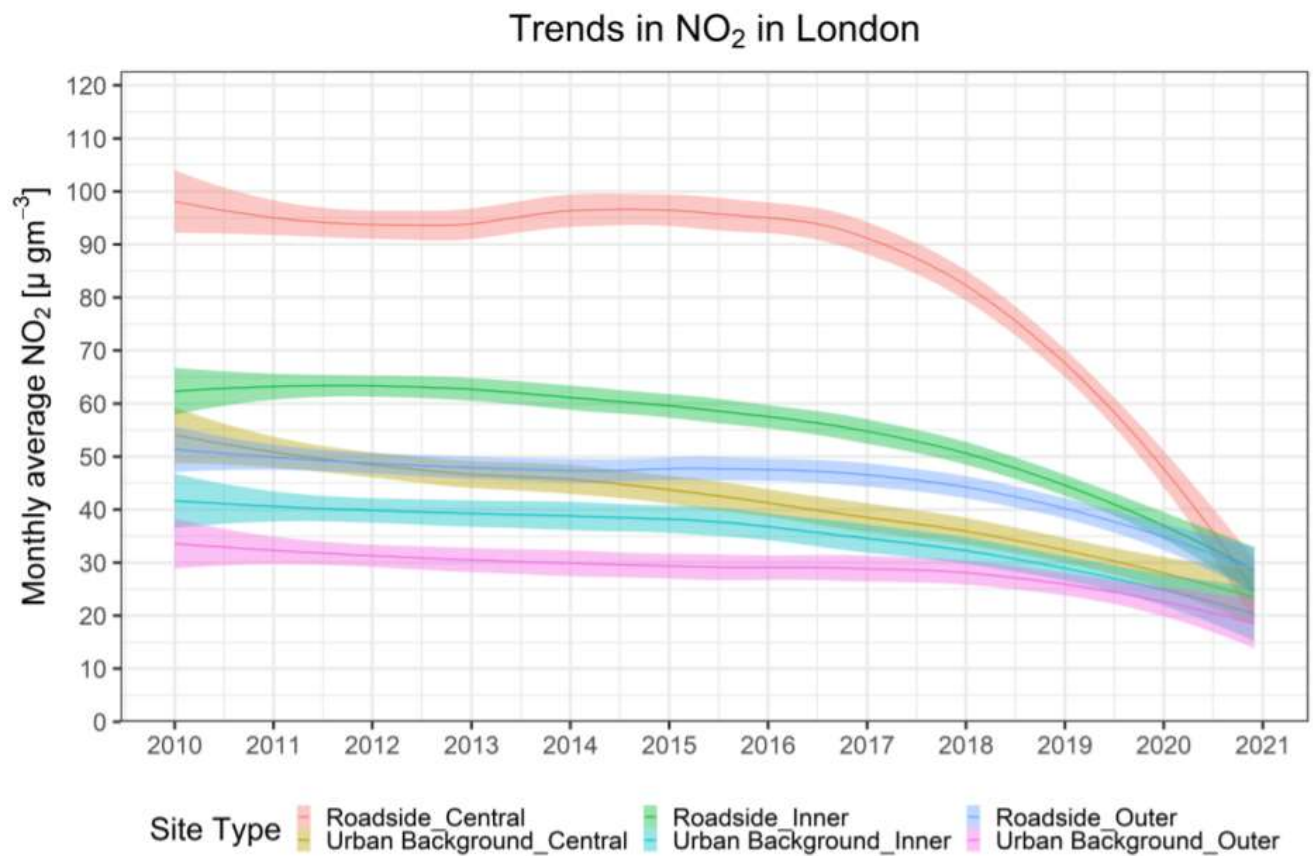
On 8th April 2019 the Mayor of London launched the world's first Ultra Low Emission Zone (ULEZ) in order to improve air quality within London. Trend analysis undertaken by the GLA⁴⁷ indicates that concentrations of NO₂ at roadside sites in Central London in February 2020 were 39 µg/m³ less than in February 2017, when changes associated with the ULEZ began (a reduction of 44 per cent). This is over double the reduction at inner roadside sites (18 µg/m³), and four times the reduction at roadside sites in outer London.

Current annual mean NO₂ concentrations within Greater London are therefore likely to be substantially lower than presented in Figure C.1, particularly within Central London. An updated version of the LAEI, which includes the modelled impact of the ULEZ, is, however, not yet available.

As illustrated in Figure 10-8, the rapid downward trend in NO₂ concentrations continued through 2020 in Central London. However, traffic flows in Central London were the most affected by pandemic measures and this will have had the effect of reducing NO₂ levels temporarily below those achieved by the ULEZ.

⁴⁷ https://www.london.gov.uk/sites/default/files/ulez_ten_month_evaluation_report_23_april_2020.pdf

Figure 10-8: Measured trends in annual mean NO₂ concentrations across greater London



SOURCE: Mayor of London (2021), Central London Ultra Low Emission Zone – 2020 Report ⁴⁸

⁴⁸ https://www.london.gov.uk/sites/default/files/ulez_evaluation_report_2020-v8_finalfinal.pdf

Appendix D. Environment Assessment Results

D.1 Oxides of Nitrogen (NOx)

Estimated changes in car, PHV, LGV and HGV NOx emissions within central London with the Proposed Changes are shown in Table 10-10. These data indicate that:

- Annual NOx emissions associated with these vehicle types are estimated to decrease by 1.6 per cent to 1.7 per cent in 2021 and 1.4 per cent to 1.5 per cent in 2031 as a result of the Proposed Changes
- Greater absolute reductions in NOx emissions are estimated to occur in 2021 than in 2031, as vehicle emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in NOx emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.0 per cent to 5.2 per cent)
- The majority of the reductions in NOx emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

Table 10-10: Estimated changes in Car, PHV, LGV and HGV NOx emissions within central London with Proposed Changes

Time Period	Vehicle Type	2021 reference case		2021 hybrid		2031 reference case		2031 hybrid	
		kg/yr	%	kg/yr	%	kg/yr	%	kg/yr	%
Annual	Car	-2,010	-8.6%	-2,030	-8.6%	-1,010	-8.6%	-1,070	-8.6%
	PHV	-390	-4.5%	-620	-5.9%	-40	-4.5%	-50	-4.5%
	LGV	-390	-0.9%	-390	-0.9%	-170	-0.9%	-180	-0.9%
	HGV	-140	-0.8%	-140	-0.8%	-130	-0.8%	-120	-0.8%
	Car, PHV, LGV & HGV	-2,930	-1.6%	-3,180	-1.7%	-1,350	-1.4%	-1,420	-1.5%
Weekday, 7am-6pm	Car	-700	-4.1%	-710	-4.1%	-350	-4.1%	-370	-4.1%
	PHV	-210	-3.4%	-260	-3.4%	-20	-3.4%	-30	-3.4%
	LGV	-310	-0.7%	-310	-0.7%	-140	-0.7%	-140	-0.7%
	HGV	-120	-0.6%	-120	-0.6%	-110	-0.6%	-110	-0.6%
	Car, PHV, LGV & HGV	-1,340	-1.5%	-1,400	-1.5%	-620	-1.3%	-650	-1.3%
Weekend, 12pm-6pm	Car	-1,310	-16.3%	-1,320	-16.3%	-660	-16.3%	-690	-16.3%
	PHV	-180	-10.9%	-370	-10.9%	-20	-10.9%	-20	-10.9%
	LGV	-80	-2.8%	-80	-2.8%	-30	-2.8%	-30	-2.8%
	HGV	-20	-2.6%	-20	-2.6%	-20	-2.6%	-20	-2.6%
	Car, PHV, LGV & HGV	-1,590	-5.1%	-1,790	-5.2%	-730	-5.0%	-760	-5.0%

Note: Values presented in kg/yr in table above are rounded to the nearest 10kg, whereas the percentages presented are exact.

D.2 Particulates (PM₁₀ and PM_{2.5})

Estimated changes in car, PHV, LGV and HGV exhaust and non-exhaust⁷ PM₁₀ emissions within central London with the Proposed Changes are shown in Table 10-11. These data indicate that:

- Annual PM₁₀ emissions associated with these vehicle types are estimated to decrease by 1.7 per cent to 1.8 per cent in 2021 and 1.6 per cent in 2031 as a result of the Proposed Changes
- Greater absolute reductions in PM₁₀ emissions are estimated to occur in 2021 than in 2031, as vehicle emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in PM₁₀ emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.2 per cent to 5.5 per cent)
- The majority of the reductions in PM₁₀ emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

Table 10-11: Estimated changes in car, PHV, LGV and HGV PM₁₀ emissions within central London with Proposed Changes

Time Period	Vehicle Type	2021 reference case		2021 hybrid		2031 reference case		2031 hybrid	
		kg/yr	%	kg/yr	%	kg/yr	%	kg/yr	%
Annual	Car	-415	-8.6%	-420	-8.6%	-330	-8.6%	-350	-8.6%
	PHV	-75	-4.5%	-125	-5.9%	-60	-4.5%	-80	-4.5%
	LGV	-50	-0.9%	-50	-0.9%	-45	-0.9%	-45	-0.9%
	HGV	-30	-0.8%	-30	-0.8%	-35	-0.8%	-30	-0.8%
	Car, PHV, LGV & HGV	-570	-1.7%	-625	-1.8%	-470	-1.6%	-505	-1.6%
Weekday, 7am-6pm	Car	-145	-4.1%	-145	-4.1%	-115	-4.1%	-120	-4.1%
	PHV	-40	-3.4%	-50	-3.4%	-35	-3.4%	-45	-3.4%
	LGV	-40	-0.7%	-40	-0.7%	-35	-0.7%	-35	-0.7%
	HGV	-25	-0.6%	-25	-0.6%	-30	-0.6%	-25	-0.6%
	Car, PHV, LGV & HGV	-250	-1.7%	-260	-1.7%	-215	-1.6%	-225	-1.6%
Weekend, 12pm-6pm	Car	-270	-16.3%	-270	-16.3%	-215	-16.3%	-225	-16.3%
	PHV	-35	-10.9%	-75	-10.9%	-25	-10.9%	-35	-10.9%
	LGV	-10	-2.8%	-10	-2.8%	-10	-2.8%	-10	-2.8%
	HGV	-5	-2.6%	-5	-2.6%	-5	-2.6%	-5	-2.6%
	Car, PHV, LGV & HGV	-320	-5.5%	-360	-5.5%	-255	-5.2%	-275	-5.3%
Note: Values presented in kg/yr in table above are rounded to the nearest 5kg, whereas the percentages presented are exact.									

Estimated changes in Car, PHV, LGV and HGV exhaust and non-exhaust⁷ PM_{2.5} emissions within central London with the Proposed Changes are shown in Table 10-12. These data indicate that:

- Annual PM_{2.5} emissions associated with these vehicle types are estimated to decrease by 1.7 per cent to 1.9 per cent in 2021 and 1.6 per cent to 1.7 per cent in 2031 as a result of the Proposed Changes
- Greater absolute reductions in PM_{2.5} emissions are estimated to occur in 2021 than in 2031, as vehicle emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in PM_{2.5} emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.1 per cent to 5.4 per cent)
- The majority of the reductions in PM_{2.5} emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

Table 10-12: Estimated changes in car, PHV, LGV and HGV PM_{2.5} emissions within central London with Proposed Changes

Time Period	Vehicle Type	2021 reference case		2021 hybrid		2031 reference		2031 hybrid	
		kg/yr	%	kg/yr	%	kg/yr	%	kg/yr	%
Annual	Car	-200	-8.6%	-205	-8.6%	-165	-8.6%	-175	-8.6%
	PHV	-45	-4.5%	-75	-5.9%	-35	-4.5%	-50	-4.5%
	LGV	-25	-0.9%	-25	-0.9%	-20	-0.9%	-20	-0.9%
	HGV	-15	-0.8%	-15	-0.8%	-15	-0.8%	-15	-0.8%
	Car, PHV, LGV & HGV	-285	-1.7%	-320	-1.9%	-235	-1.6%	-260	-1.7%
Weekday, 7am-6pm	Car	-70	-4.1%	-70	-4.1%	-55	-4.1%	-60	-4.1%
	PHV	-25	-3.4%	-30	-3.4%	-20	-3.4%	-25	-3.4%
	LGV	-20	-0.7%	-20	-0.7%	-15	-0.7%	-20	-0.7%
	HGV	-10	-0.6%	-10	-0.6%	-15	-0.6%	-10	-0.6%
	Car, PHV, LGV & HGV	-125	-1.7%	-130	-1.7%	-105	-1.6%	-115	-1.7%
Weekend, 12pm-6pm	Car	-130	-16.3%	-130	-16.3%	-105	-16.3%	-115	-16.3%
	PHV	-20	-10.9%	-45	-10.9%	-15	-10.9%	-20	-10.9%
	LGV	-5	-2.8%	-5	-2.8%	-5	-2.8%	-5	-2.8%
	HGV	<-5	-2.6%	<-5	-2.6%	<-5	-2.6%	<-5	-2.6%
	Car, PHV, LGV & HGV	-155	-5.4%	-180	-5.4%	-125	-5.1%	-140	-5.3%
Note: Values presented in kg/yr in table above are rounded to the nearest 5kg, whereas the percentages presented are exact.									

D.3 Carbon dioxide

Estimated changes in Car, PHV, LGV and HGV CO₂ emissions within central London with the Proposed Changes are shown in Table 10-13. These data indicate that:

- Annual CO₂ emissions associated with these vehicle types are estimated to decrease by 1.7 per cent to 1.8 per cent in 2021 and 1.7 per cent to 1.8 per cent in 2031 as a result of the Proposed Changes

- Greater absolute reductions in CO₂ emissions are estimated to occur in 2021 than in 2031, as vehicle emissions are expected to reduce over time due to improvements in the local vehicle fleet (e.g. increased electrification)
- The greatest reductions in CO₂ emissions as a result of the Proposed Changes are estimated to occur between 12pm and 6pm on weekends (5.5 per cent to 5.7 per cent)
- The majority of the reductions in CO₂ emissions as a result of the Proposed Changes are estimated to be attributable to a reduction in emissions from cars.

Table 10-13: Estimated changes in car, PHV, LGV and HGV CO₂ emissions within central London with Proposed Changes

Time Period	Vehicle Type	2021 reference case		2021 hybrid		2031 reference case		2031 hybrid	
		T/yr	%	T/yr	%	T/yr	%	T/yr	%
Annual	Car	-1,430	-8.6%	-1,450	-8.6%	-1,190	-8.6%	-1,260	-8.6%
	PHV	-180	-4.5%	-280	-5.9%	-70	-4.5%	-90	-4.5%
	LGV	-150	-0.9%	-150	-0.9%	-130	-0.9%	-130	-0.9%
	HGV	-110	-0.8%	-110	-0.8%	-100	-0.8%	-100	-0.8%
	Car, PHV, LGV & HGV	-1,870	-1.7%	-1,990	-1.8%	-1,490	-1.7%	-1,580	-1.8%
Weekday, 7am-6pm	Car	-500	-4.1%	-510	-4.1%	-420	-4.1%	-440	-4.1%
	PHV	-100	-3.4%	-120	-3.4%	-40	-3.4%	-50	-3.4%
	LGV	-120	-0.7%	-120	-0.7%	-100	-0.7%	-100	-0.7%
	HGV	-100	-0.6%	-100	-0.6%	-90	-0.6%	-80	-0.6%
	Car, PHV, LGV & HGV	-820	-1.7%	-850	-1.7%	-650	-1.6%	-670	-1.6%
Weekend, 12pm-6pm	Car	-930	-16.3%	-940	-16.3%	-780	-16.3%	-820	-16.3%
	PHV	-80	-10.9%	-170	-10.9%	-30	-10.9%	-40	-10.9%
	LGV	-30	-2.8%	-30	-2.8%	-20	-2.8%	-30	-2.8%
	HGV	-10	-2.6%	-10	-2.6%	-10	-2.6%	-10	-2.6%
	Car, PHV, LGV & HGV	-1,050	-5.5%	-1,150	-5.6%	-840	-5.5%	-900	-5.7%
Note: Values presented in T/yr in table above are rounded to the nearest 10 tonnes, whereas the percentages presented are exact.									

Appendix E. People Baseline

E.1 Introduction

This appendix sets out the baseline information gathered in relation to four key aspects for the Health and Equalities Impact Assessment:

- Health profiles of London, and the boroughs fully or partially within the CCZ where this data was available
- An evidence base for the health pathways and determinants (Health and Equalities IIA Topics) considered in the assessment
- Key health inequalities in London
- Baseline data in relation to PCGs.

E.2 Health Profiles

E.2.1 London

The 2011 Census asked people to self-assess their health as 'very good', 'good', 'fair', 'bad' or 'very bad'. Around half of London residents said their health was very good and around a third said that it was good. Of the remaining 1.3 million some 305,000 residents, 3.7 per cent of the total, reported that they had bad health and 100,000 (1.2 per cent) reported very bad health in London compared to 4.3 per cent and 1.3 per cent in England and Wales respectively (ONS, 2011).

Public Health England (PHE) publish Health Profiles that report a range of health indicators collected at ward level in London to rank the overall health of boroughs within Greater London against the average levels in England.

Table 10-14 presents results for the Health Profile indicators that may be affected by the Proposed Changes for Greater London as a whole and all London Boroughs. Each indicator is benchmarked against the English average using the following colour codes:

- Green = better
- Orange = similar
- Red = worse.

Most of the indicators for Greater London are similar or better than the average levels in England as a whole, however there is significant variation between boroughs, as shown in Table 10-14. For the IMD indicator, the least deprived boroughs are predominantly situated in the south-west, in the outer London are (for instance, Richmond upon Thames, Sutton, Merton, Kingston upon Thames). On the contrary, the most deprived boroughs are located in the north-east, these include Hackney, Tower Hamlets, Barking and Dagenham, Newham and Islington. This geographical distribution is also reflected in the 'children in low income families' indicator.

The 'percentage of physically active adults' fluctuates across the city with no clear pattern. Overall, the London region is performing worse with 66.6 per cent of physically active adults compared to the England average of 67.2 per cent. This varies from the 'excess weight in adults' indicator which is significantly better in London in comparison with the England average. Londoners in the south and west of London were getting more exercise than those in the east, with many boroughs, including Richmond, Kensington and Chelsea, and Kingston upon Thames having over 70 per cent of adults categorised as physically active. In many cases, low levels of adult physical activity were reflected in obesity rates. Boroughs in outer east London have a higher number of adults with weight problems. At the borough level, the number of children classed as overweight or obese are the highest in east and north east London (Barking and Dagenham, Newham), whilst south west boroughs (Richmond and Sutton) have the lowest levels of overweight children in London.

Life expectancy for both women and men is better in outer London, with the exception of Camden, Kensington and Chelsea and Westminster, where expectancy is also above than the England average. The “under 75 mortality rates from all cardiovascular diseases” indicator also varies across all boroughs. In general, the London region performs in line with the England average however the London boroughs of Barking and Dagenham, Hackney, Tower Hamlets and Lambeth perform significantly worse with rates over 86 per 100,000 under 75 cardiovascular mortality compared to the 70.4 England average. On this indicator only two boroughs (Camden and Westminster) perform better than the England average.

Regarding the health profiles of boroughs within CCZ it is worth noting that performance in several of the indicators is poorer compared to other boroughs within the London region and the England average. All of the boroughs within the CCZ (Camden, Westminster, Lambeth, Southwark, Tower Hamlets, City of London, Islington and Hackney) perform significantly worse than the England average on the “children in low income families” indicator, with the worst performing boroughs being Islington with 30.8 per cent and Tower Hamlets with 30.3 per cent compared to the 17 per cent England average and the 18.8 London Region average. On the other hand, for the “obese children indicator” the worst performing CCZ boroughs are Hackney and Southwark with 27.4 per cent and 27.2 per cent of obese children compared to 21 per cent England average.

Indicators where CCZ boroughs outperform the England average include “excess weight in adults” and “life expectancy at birth for women”. For the male life expectancy indicator all CCZ boroughs perform in line with the England average except for Camden which performs better than average.

Table 10-14 shows the overall IMD rankings for the boroughs within the CCZ. In relation to the indicator for ‘Health’ in the IMD, all boroughs within the CCZ perform worse than the England average with the exception of Camden and Westminster that outperform the national average. The most deprived boroughs in the CCZ are Hackney and Tower Hamlets. This is also reflected in the “children in low income families indicator” with Tower Hamlets ranking the lowest in the CCZ and the second lowest among all London boroughs.

Table 10-14: Health profile indicators for London Boroughs, benchmarked against England (PHE, 2021)

Indicator	Period	Units	England	London Region	Barking and Dagenham	Barnet	Bexley	Brent	Bromley	Camden	Croydon	Ealing	Enfield	Greenwich	Hackney	Hammersmith and Fulham	Haringey	Harrow
Deprivation score (IMD 2015)	2019		21.8	-	32.7	16.1	16.3	25.5	14.2	20.1	22.5	22.7	25.8	24.5	32.5	22.2	27.9	15
Children in low income families (under 16s)	2016	Proportion %	17	18.8	22.5	14	16.3	18	13.2	27.3	16.1	16.9	22.2	21.8	24.7	20.6	21.3	12.9
Obese children (Year 6)	2019 – 20	Proportion %	21	23.7	29	20.6	22.8	25.2	15.6	21.9	25.1	23.5	27	27.6	27.4	19.7	22.3	21
Percentage of physically active adults	2018 – 19	Proportion %	67.2	66.6	46.7	59.4	64.4	56.3	69.5	70.1	62.1	60.4	67.4	62.9	67.7	74.2	68.7	64.5
Excess weight in adults	2018 – 19	Proportion %	62.3	55.9	72.7	55.2	65.9	49.5	65.7	41.7	62.9	57.6	66.8	60.9	51.7	48.9	48.7	54.8
Life expectancy at birth (Male)	2017 – 19	years	79.8	80.9	78.1	82.9	80.1	81.4	81.6	83.3	80.4	81.1	81	79.6	79.8	79.8	80.7	83.2
Life expectancy at birth (Female)	2017 – 19	years	83.4	84.7	82.3	86	84.1	85.5	85.1	87.1	83.9	84.8	84.7	83.4	84.2	84.7	84.8	86.2
Under 75 mortality rates from all cardiovascular diseases	2017 – 19	Value per 100,00	70.4	69.1	91.2	51.1	60.2	76.2	55.5	58.5	65.5	76.5	71.9	74.1	87.2	76.2	81.4	56.6
Killed and seriously injured on roads	2016 – 18	value per 100,000	42.6	39.5	37	30.8	25.6	29	31.5	50.9	27.2	38.6	32.8	29.8	49.2	52.3	40.8	24.6

Indicator	Period	Units	Havering	Hillingdon	Hounslow	Islington	Kensington and Chelsea	Kingston upon Thames	Lambeth	Lewisham	Merton	Newham	Redbridge	Richmond upon Thames	Southwark	Sutton	Tower Hamlets	Waltham Forest	Wandsworth	Westminster
Deprivation score (IMD 2019)	2019		16.9	18.2	21.5	27.5	21.5	11.4	25.4	26.7	14.6	29.6	17.2	9.4	25.8	14	27.9	25.2	16.6	20.3
Children in low income families (under 16s)	2016	Proportion %	16.5	16	13.8	30.8	20.5	11.7	23.4	22.6	13.1	20.1	14.7	8.5	23.2	9.8	30.3	19.4	17.2	27.3
Obese children (Year 6)	2019 – 20	Proportion %	23.8	21.3	23.9	25	23.1	18.6	23.7	24.2	20.1	24.2	25	11.1	27.2	18.4	25.9	23.7	19	25.2
Percentage of physically active adults	2018 – 19	Proportion %	63.7	61.6	63.3	75.3	70	71	73	73.1	66.8	56.2	58.9	76.1	69.6	71.3	70	69.7	79.6	70.4
Excess weight in adults	2018 – 19	Proportion %	63.1	59.8	57.5	55.8	49.4	57.4	50.2	59.1	55.1	57.4	59.7	53.6	51.5	62.9	56.9	52.9	52.5	48.6
Life expectancy at birth (Male)	2017 – 19	years	80.1	80.2	80.2	79.7	83.9	81.8	79.5	79.1	81.1	80.4	81.5	82.6	79.6	80.9	80.4	80.7	80.6	84.9
Life expectancy at birth (Female)	2017 – 19	years	84.1	84	84	83.4	87	85.2	84.2	83.8	84.5	83.5	85.2	86.3	84.9	84.3	83.6	85	84.2	87.2
Under 75 mortality rates from all cardiovascular diseases	2017 – 19	Value per 100,000	71.4	75.8	81.8	73.9	45.6	58.5	84.9	81.3	62.3	94	63.4	53	69.6	51.7	86.9	79.2	76.6	51.6
Killed and seriously injured on roads	2016 – 18	value per 100,000	30.5	32.5	38.9	49.2	66.3	27.3	54.5	32.5	29.4	32.7	28.3	35.6	44.7	26.4	51.2	30.9	42.8	97.4

E.3 Health and Equalities IIA Topics Evidence Base

A literature review of various sources - including scientific research, policy documents and emerging evidence - has been undertaken to form an evidence base for the Health and Equalities Impact Assessment. The purpose of the literature review is to identify a plausible health pathway and resulting potential change in health outcome in relation to the Health and Equalities IIA Topics impacted by the Proposed Changes. The evidence base and relevant pathways for the Health and Equalities IIA Topics are provided in this section.

E.3.1 Air Quality

The links between air quality emissions and health effects are well established, with poor air quality linked to human health conditions such as asthma, respiratory problems and cardiovascular disease (Royal College of Physicians, 2016). It is now widely accepted that long-term exposure to air pollution (exposure to pollution over the entire life span of an individual) increases mortality risk and thus decreases life expectancy. Estimates suggest that exposure to outdoor air pollution contributes to 40,000 deaths per year in the UK (Royal College of Physicians, 2016). The main pollutants from vehicle emissions are particulate matter and nitrogen oxides (NO_x). These pollutants can affect lung function and cause respiratory problems, with short-term acute exposure having a greater adverse effect than a longer-term exposure at lower concentrations.

Between 2017 and 2025, the total cost of PM_{2.5} and NO₂ combined is estimated to be £1.6 billion in models used in Public Health England's cost of air pollution project (Public Health England, 2018). It has been predicted that total health costs resulting from air pollution vary between £8.5 billion and £20.2 billion per year. Poor air quality can also have a negative economic effect by reducing productivity amongst individuals of working age. The Department for Environment, Food and Rural Affairs estimated that in 2012, poor air quality costed the economy £2.7 billion through productivity loss (Defra, 2015).

Levels of vulnerability to poor air quality can change due to biological (e.g. age, sex, disease, diet) or environmental (e.g. place of residence, housing, access to healthcare, mode of travel) factors. Groups particularly vulnerable to air pollution include children, pregnant women, older people and those from more deprived backgrounds. For children, air pollution can have a negative effect on neural development and cognitive capacities, which in turn can affect performance at school and later in life. Similarly, pregnant women are at greater risk from air pollution, with maternal exposure to ambient air pollution associated with adverse impacts on fertility, pregnancy, new-borns, and children. People from more deprived communities are also more sensitive to air pollution because they are more likely to have existing medical conditions and tend to live in areas where air pollution is worse (Royal College of Physicians, 2016)

Traffic contributes to a range of gaseous air pollutants and to suspended particulate matter (PM) of different sizes and composition. A report by the Committee on the Medical Effects of Air Pollutants (COMEAP) noted positive associations between long-term exposure to NO₂ and all-cause, respiratory and cardiovascular mortality, children's respiratory symptoms and lung function, though uncertainties remain about causality due to strong correlations with other pollutants (COMEAP, 2015). Tailpipe emissions of primary particles from road transport account for up to 30 per cent of fine PM in urban areas (World Health Organisation, 2005). There is evidence to suggest that both primary and secondary (particularly sulphate) PM is detrimental to health. A report by the COMEAP (2010) concluded that *'removing all anthropogenic particulate matter air pollution could save the UK population approximately 36.5 million life years over the next 100 years and would be associated with an increase in UK life expectancy from birth, i.e. on average across new births, of six months.'*

In 2013 roughly 1.9 million people, or 23 per cent of London's population were living in areas with average NO₂ concentrations above the EU limit value, mostly in central and inner London. Concentrations are still higher towards central London, with its higher density of emissions sources (Greater London Authority, 2018).

Despite falling vehicle numbers, central London has had significantly higher levels of congestion when compared with outer London and the rest of the UK. According to a report on "The economic future of the Central Activities

Zone (CAZ)" (2021), there was an initial reduction in congestion during the March 2020 lockdown, however congestion rates increased again in autumn 2020 due to more people using private cars instead of public transport as a result of the coronavirus pandemic. The ULEZ, and its extension to the outer circular road, together with other Mayoral policies and a conversion to lower emission fleets is expected to improve air quality in London by 2025.

A recent report by Imperial College London (2021) predicts that London specific air quality policies, combined with wider improvements in air quality, will improve the average life expectancy of a child born in London in 2013 by six months, compared with 2013 air pollution concentrations remaining unchanged. The report found that in 2019 around 4000 deaths in the London could be caused by air pollution. The highest mortality rates were identified in outer London boroughs. This is due to the higher percentage of older people living in these areas who are more susceptible to the impacts of air pollution. Life expectancy improvements were found to be greater in inner London as a result of a greater concentration of air pollution reductions in these areas.

The Mayor of London's School Air Quality Audit Programme has audited 50 primary schools in the city's most polluted areas and made recommendations to reduce emissions and exposure. Figure 10-9 shows the location of London primary schools where the legal limit for nitrogen dioxide has been exceeded. The map highlights that the more polluted schooled are situated within central and inner London, on major arterial roads, and along the North-South Circular. Figure 10-10 shows that all London Primary schools are also exposed to levels of particulate matter above the WHO's recommended safe levels of exposure.

Figure 10-9: London's more polluted primary schools and 2013 LAEI baseline annual mean NO₂ concentrations (Mayor of London, 2018)

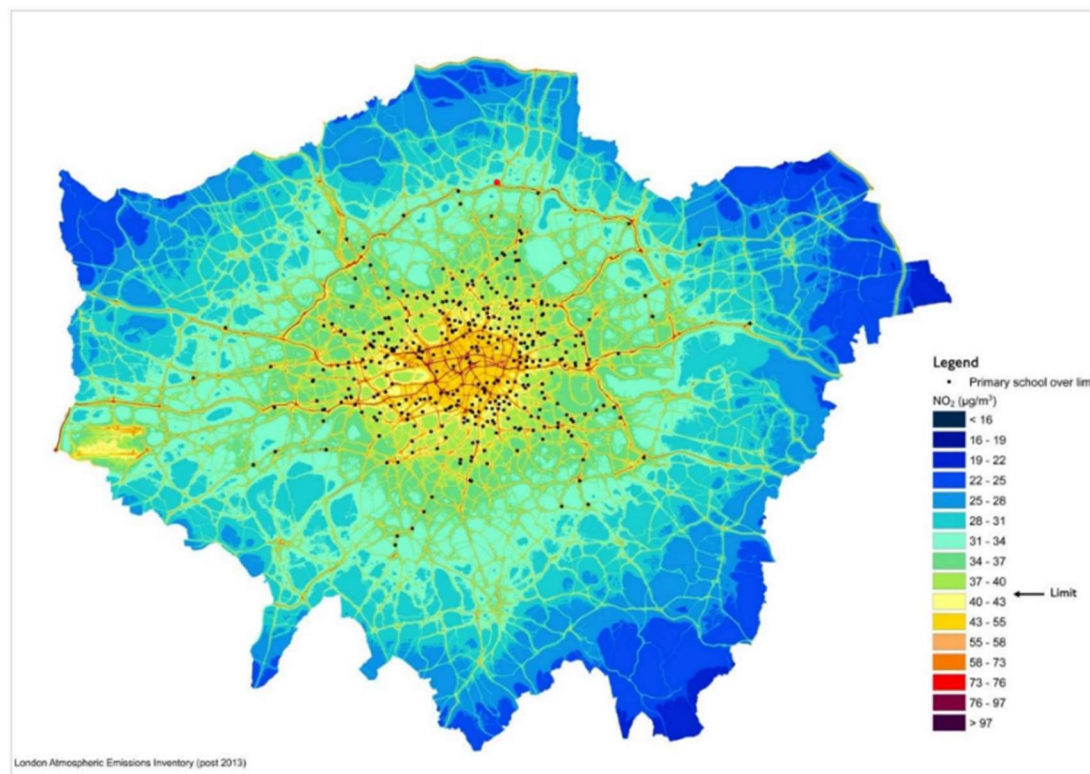
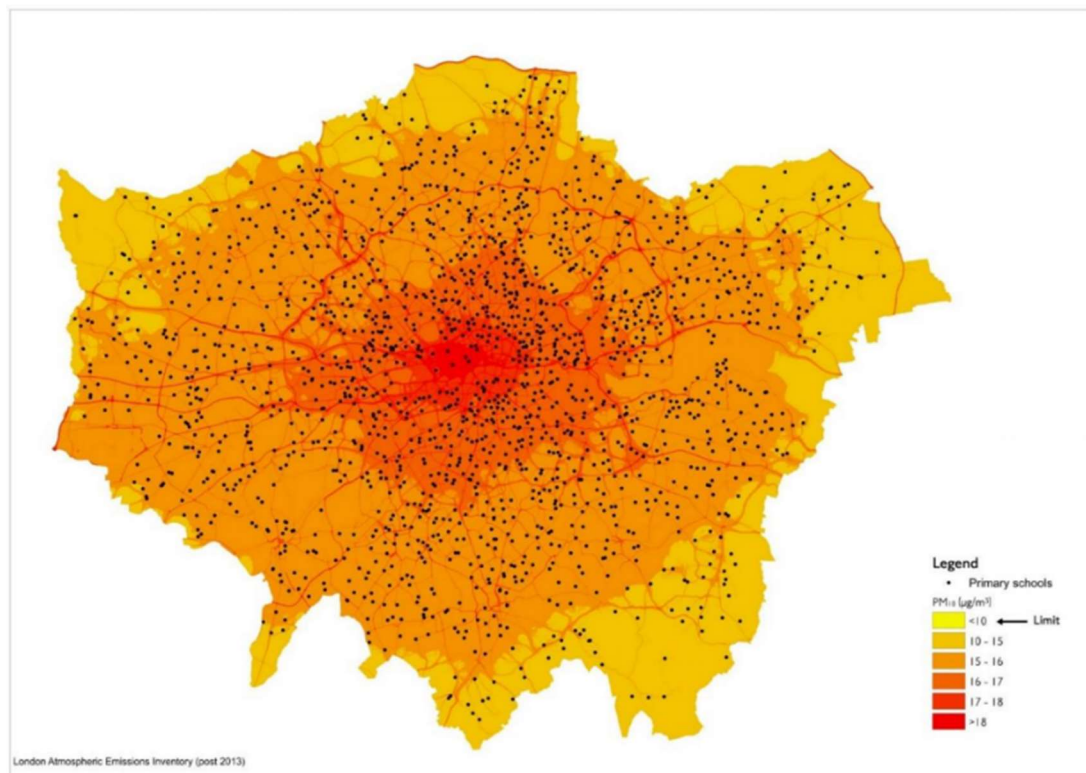


Figure 10-10: London's more polluted primary schools and 2013 LAEI baseline annual mean PM10 concentrations (Mayor of London, 2018)



The Mayor's School Air Quality Audit Programme Report (2018) also identified links between severance as a result of busy road traffic and increased exposure to higher levels of air pollution. The report found that children approaching the school building often have to cross a busy road and wait for extended periods at the roadside where exposure to emissions at its worse, before they are able to cross.

Further baseline information in relation to air pollution is detailed in Appendix B.

E.3.2 Noise

The World Health Organisation states that high levels of environmental noise are a threat to public health. Living in an area which is frequently exposed to intolerable levels of noise can be linked with a varied range of negative impacts on health, wellbeing and quality of life. On the contrary, a quiet area with an absence of significant noise can benefit wellbeing and might improve mental health, creativity, problem solving, concentration and sleep quality (Randall, 2012). There is an extensive range of non-auditory health effects that may be linked with exposure to ambient noise. Examples of non-auditory health effects which have been linked to environmental noise include annoyance, sleep disturbance, cardiovascular and physiological effects, mental health effects, reduced performance, learning and communication difficulties (WHO, 2000).

Disruptive noise impacts in urban spaces is closely associated with negative health impacts on society especially amongst those who are most vulnerable to increased noise impacts. A report published by the Health Protection Agency in 2010 cited examples of nonauditory health effects which have been linked to environmental noise including annoyance, sleep disturbance and other night time effects, cardiovascular and physiological effects, mental health effects, reduced performance, communication and learning effects (Environmental Noise and Health in the UK, 2010). Additionally, long-term average exposure to high levels of noise can trigger elevated blood pressure and lead to ischaemic heart disease (European Commission, n.d).

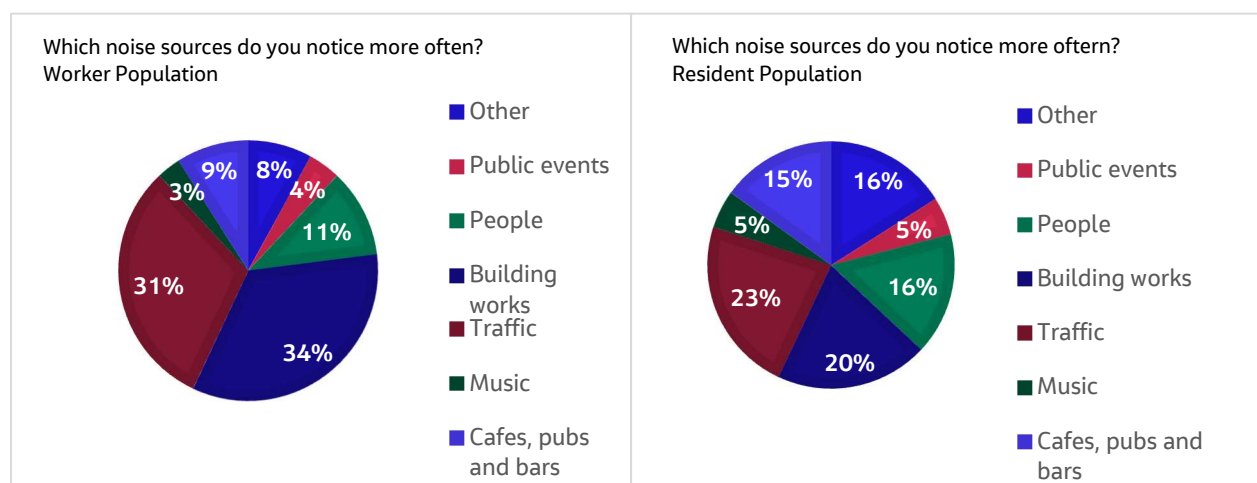
The London Environment Strategy (2018), states that the social cost of noise pollution in England from road traffic alone is predicted to be between £7bn and £10bn per year. In London due to the widespread road network across the capital, road traffic is the major single cause of noise pollution in London. Noise exposure data shows that within Greater London, almost 2.4 million people are exposed to road traffic noise levels that are above the WHO threshold for outdoor noise levels (55dB). However, it should be noted that WHO's environmental noise guidelines for road traffic recommends reducing noise exposure levels below 50dB on average and below 45dB at night to avoid adverse health effects (WHO, 2018).

According to the City of London Noise Strategy 2016 – 2026 (City of London, n.d), the City of London (London's principal business location situated within the CCZ) experiences relatively high levels of noise with traffic dominating the city during the day, and building service noise dominating at night and at weekends. The Strategy cites noise from commercial vehicles as significant particularly on Transport for London 'red routes', from commercial vehicle and Hackney cab activity related to servicing the business and development needs of the City (City of London, n.d).

In 2009 noise monitoring was undertaken in the City average noise levels in the City during the week day were found to be between 53dB LAeq,T at the center of Barbican to 74dB LAeq,T at Bank junction. At night, noise levels at the Barbican reduced to 50dB LAeq,T and to 72dB LAeq,T at Bank junction (City of London, n.d). These noise levels are above both the average and night-time exposure levels recommended by WHO, though it should be noted that the noise levels recorded were attributed to a range of sources and not just road traffic.

The Strategy also reviewed the noise complaints received in the City since 2011. The number of complaints received in relation to road traffic noise was low (1 per cent of total complaints) compared to noise complaints received for other sources, particularly for construction/demolition activities (39 per cent of total complaints). However, when a selection of residents, visitors and workers were surveyed regarding the type of noise they notice in the City, 23 per cent of residents and 31 per cent of workers cited traffic as the source of noise noticed most often, as shown on Figure 10-11 (City of London, n.d.).

Figure 10-11: Noise sources noticed most often, responses from workers and residents (City of London, n.d)



These data indicate that while construction works are the most likely to be complained about – likely due to the higher, more intrusive levels of noise – traffic remains the next greatest cause for concern in terms of its noticeability. Road traffic noise is less likely to be complained about however, possibly as it is a more consistent source of background noise.

E.3.3 Accessibility, Connectivity and Active Travel

Walking, cycling and public transport allow people to be more physically active compared to car use, with the average amount of time spend physically active per journey being less than 1 minute for car trips; 8-15 minutes for public transport trips; 17 minutes for walking trips; and 22 minutes for cycling trips (Mayor of London, n.d). Active travel is a key mode of transport in London and is the main source of physical activity for Londoners. There is strong evidence to suggest that physical activity – including physical activity through active travel - can help prevent some diseases particularly cardiovascular and cerebrovascular disease, certain cancers, Type-2 diabetes and obesity. The UK is currently experiencing an epidemic of obesity and physical activity: in England nearly a quarter of adults are classified as obese, and two-thirds are obese or overweight. The Foresight Report of 2007 predicted that by 2050, 60 per cent of men, 50 per cent of woman and 25 per cent of children will be obese, costing society £50 billion per year (Government Office for Science, 2019). According to PHE the percentage of active adults is lower in London (66.6 per cent) compared to the England average of 67.2 per cent. However physical activity in London has increased over recent years (ibid). Similarly, the percentage of adults classified as overweight has continued to improve in the London region (55.9 per cent), outperforming the national average of 62.3 per cent.

The Mayor's Transport Strategy sets the aim for all Londoners to travel actively for at least 20 minutes every day by 2041. UK Chief Medical Officers recommend that adults should do at least 150 minutes per week of moderate to vigorous physical activity and aligns with the current aim for all Londoners to achieve 20 minutes of active travel per day. However, new evidence shows that health benefits are gained from even very short periods of physical activity, and therefore the guidance no longer states that activity needs to be done in minimum periods of ten minutes.

In addition to the health benefits gained from use of sustainable and active travel modes, changes to accessibility can have other implications for people's physical and mental health. Community severance⁴⁹ resulting from traffic congestion can lead to increased distances to workplaces and community facilities such as schools, parks, religious centres, and health services. For older people, the road network can contribute considerably to feelings of isolation and low levels of independent mobility. There is also empirical evidence to suggest that increased traffic speed and volume reduces physical activity, social contacts, children's play and access to goods and services (Mindell and Saffron, 2012). Removing severance by providing more attractive walking routes can therefore result in improved social cohesion and increased uptake of physical activity.

As outlined above, use of public transport also supports active travel. The MTS sets out that buses play a key role in delivering the Healthy Streets approach, and are one of the most efficient uses of road space, as they can move 70 people in the same amount of space taken up by about three cars (Mayor of London, 2018). The removal of cars from the roads frees up street space and makes streets more attractive for active travel. Buses are also an affordable, reliable mode of transport that is accessible to all, including older and disabled people and those travelling with young children.

In relation to current use of active travel modes, trips made by walking and cycling have increased in recent years. Figure 10-12, from Transport for London's Travel in London Report 13 (2020) illustrates the percentage mode share for active, efficient and sustainable modes of travel from 2000 to 2019. The active, efficient and sustainable mode share for 2019 was estimated to be 63.2 per cent, a 0.2 percentage point increase over 2018, and 3.6 percentage points higher than 2010 (Transport for London, 2020). In 2019/20, 42 per cent of Londoners achieved 20 minutes of active travel per day, an increase of 3 percentage points on 2018/19.

In 2019, 11.5 per cent of Londoners lived within 400 metres of the London-wide cycle network, compared to the Mayor's aim of 28 per cent by 2024, a 30.6 per cent increase on 2018 (Transport for London, 2020). Emerging evidence shows that there is stronger growth in cycle volume and improvement in other transport strategy

⁴⁹ The term 'community severance' describes the effects of transport infrastructure or motorised traffic as a physical or psychological barrier separating one built-up area from another built-up area or open space.

outcomes in areas where investment is made in cycling infrastructure. For example, providing more space for cyclists reduces congestion, making buses more reliable and efficient, and thereby a more attractive mode of sustainable transport. Pedestrian flows are higher on high streets and city hubs, tending to be lower on local streets and footpaths, highlighting the importance of allocating appropriate space to their movement and to reduce congestion of pavements. TfL surveys highlight that a quarter of people find roads are not easy to cross and a similar proportion reports road are too noisy; both are factors which deter people from walking and detract from their enjoyment of central London.

Transport for London's Travel in London Report 13 (2020) breaks down the percentage of active and sustainable mode share between the London boroughs, illustrated in Figure 10-12. In general, in the years 2016/17 to 2018/19 Inner London (including central London) residents had a higher share of trips made by active, efficient and sustainable modes, to be expected given the denser land use and more comprehensive public transport network. Residents of several of the boroughs within the CCZ – City of London, Westminster, Camden and Hackney – had some of the highest cycle and walking mode share of all London boroughs. Outer London residents had lower overall active, efficient and sustainable mode shares

Figure 10-12: Trip-based active, efficient and sustainable mode share (London Travel Demand Survey) (Transport for London, 2020).

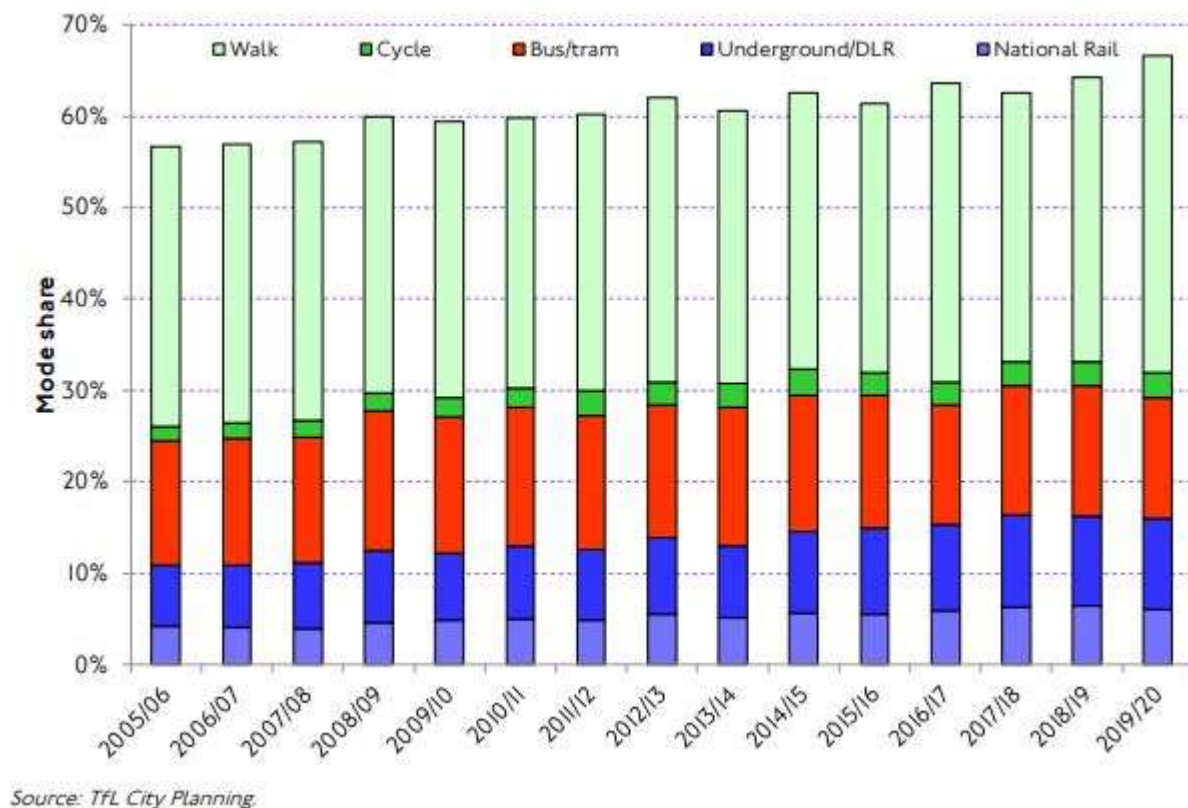
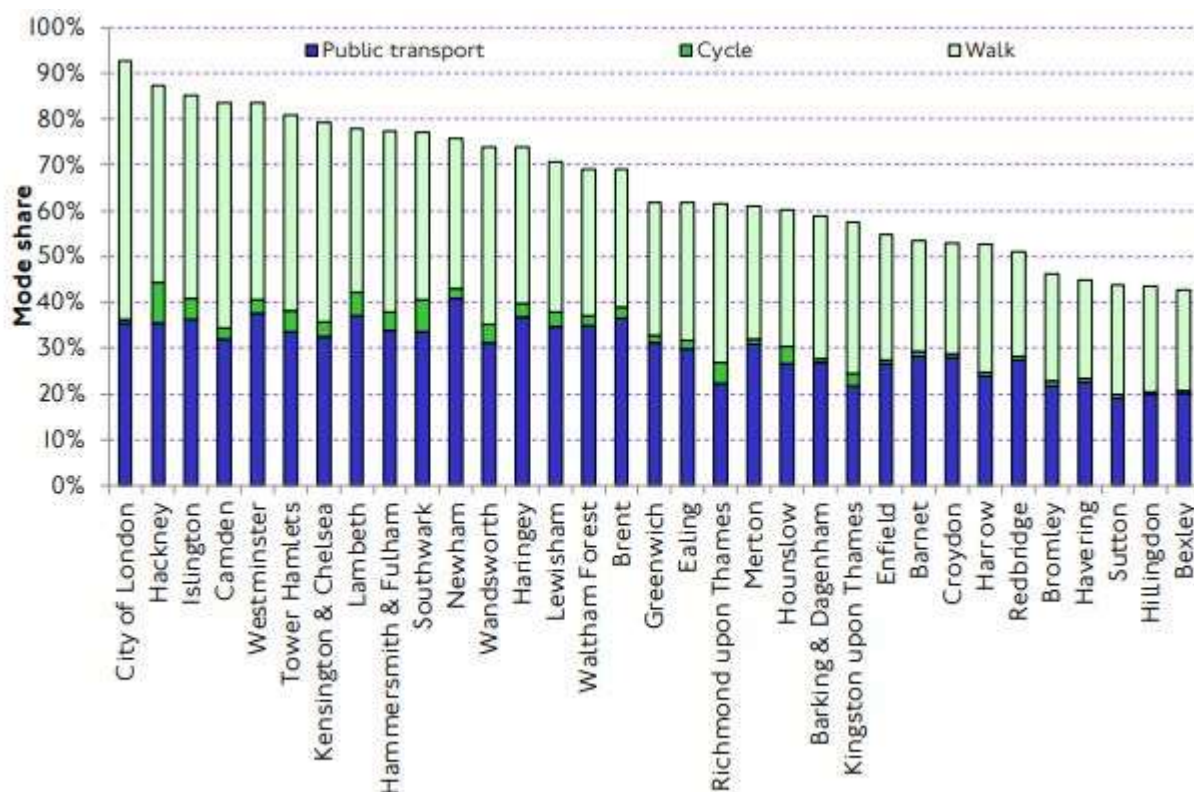


Figure 10-13: Trip based mode share for active, efficient and sustainable modes by borough of residence, LTDS 3 year average 2017/18 – 2019/20 (Transport for London, 2020).



Source: TfL City Planning.

During the coronavirus pandemic, a new initiative for improving streetspace in London aimed to make it easier and safer for people to social distance through investing in infrastructure for people to get around by walking, cycling, scooting and wheelchair. It was envisaged that the measures would encourage people to take up active travel modes and prevent an increase in car use whilst contributing towards reducing air pollution and tackling the climate emergency. The measures were supported by doctors and healthcare professionals who, in a letter to the Mayor of London in 2020, noted the potential health benefits in relation to several determinants of health. Obesity and inactivity was noted as an 'epidemic of disease', with one in six deaths in the UK attributable to inactivity as well as 40 per cent of long term illnesses. This was compared to the Netherlands where cycling is a daily part of life, and where there are far lower levels of obesity than the UK (Transport for London, 2020).

Doctors and healthcare professionals in London have also noted that a great deal of their patients regard safety as a barrier which prevents them from taking up cycle as a mode of transport within the city, as they feel it is too dangerous. Other major cities which provide safe cycle infrastructure – Copenhagen, Barcelona, and Seville, as well as small areas of London and other UK cities – has resulted in more people taking up cycling in these urban areas. Evidence shows that improved infrastructure leads to significant reductions in deaths and serious injuries; London had 125 fatalities and 3780 serious injuries on the roads in 2019, while Oslo – noted as having extensive active travel infrastructure – recorded no fatalities in the same year (Transport for London, 2020).

E.3.4 Access to health and social care services and other social infrastructure

The 2008 Place Survey showed that 44 per cent of adults in England reported access to healthcare services as one of the key factors that made an area a good place to live (Department for Communities and Local Government, 2008). According to the Department for Transport, 'over the course of a year around 1.4 million

people miss, reject, or choose not to seek healthcare due to transport problems (Social Exclusion Unit, 2003). The key areas that influence people's ability to access healthcare services include lack of financial support for people on low incomes, location of healthcare facilities and lack of access to adequate transport. In particular for people without access to a car, the lack of available and affordable public transport limits healthcare accessibility. This leads to costs on the health of patients resulting from missed appointments, late diagnoses and treatment not being sought.

People with disabilities reported worse access to healthcare, with financial cost, long waiting lists and transportation as the major barriers (Sakellariou and Rotarou, 2017). These findings are concerning as they demonstrate that a section of the population, who may have higher healthcare requirements, faces increased barriers in accessing services. Regarding mental health services, London performs significantly worse compared to the rest of England, with the lowest rates of recovery and improvement across the country. Early intervention in Psychosis services have waiting times of a year or more, therefore people hit crisis point long before they obtain adequate treatment. When those with mental ill-health are in crisis, only 14 per cent report having access to the support they need (Greater London Authority, 2015).

Access to local shops, places of entertainment, community activities and post offices all contribute to well-being. Results from a 2010/11 survey showed that 5 per cent of adults in United Kingdom feel 'isolated' due to difficulties in accessing local shops and services (Randall, 2012). People without private cars are likely to be vulnerable to impacts on accessibility to local and social facilities. This is more common among people on low incomes and older people. Access to leisure and social facilities is a determinant of health and wellbeing. Having easy access to local shops and services, and green spaces to walk or play in, which in turn can help people to live healthier and happier lives (Randall, 2012). Research demonstrates that leisure activities can have a positive impact on individuals' physical and mental health because it serves as way of coping with daily stressors and difficult life events (Caldwell, 2005).

Key health and social care services and other social infrastructure accessed by the Londoners within the CCZ are shown on Figure 10-14. The proportion of provision of unpaid care for the boroughs within the CCZ is shown on Figure 10-15. Other than providing no care, across the boroughs, 62 per cent provided 1 to 19 hours, 16 per cent provided 20 to 49 hours and 22 per cent provided 50+ hours of unpaid care a week.

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Figure 10-14: Key health and social care facilities within the CCZ

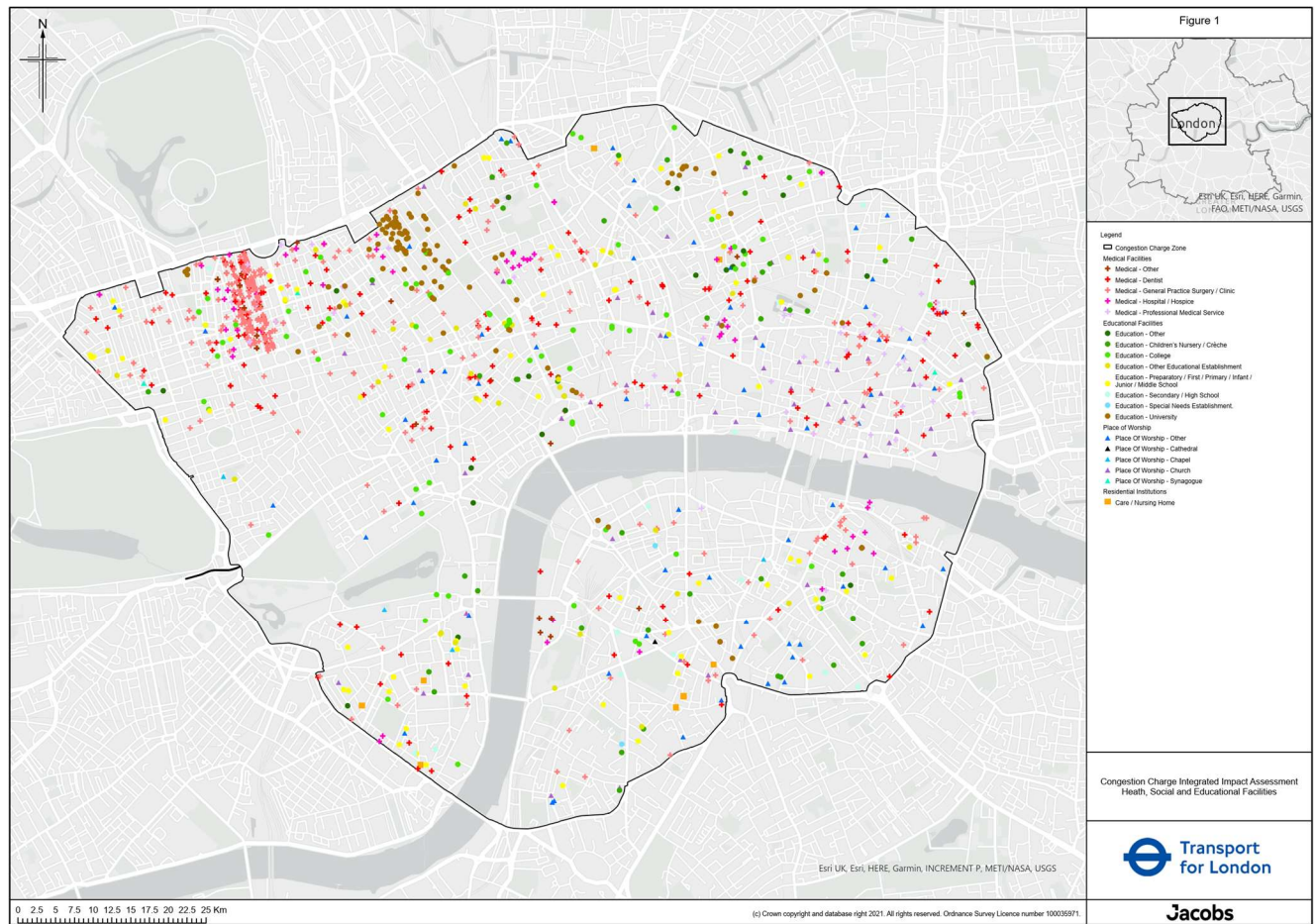
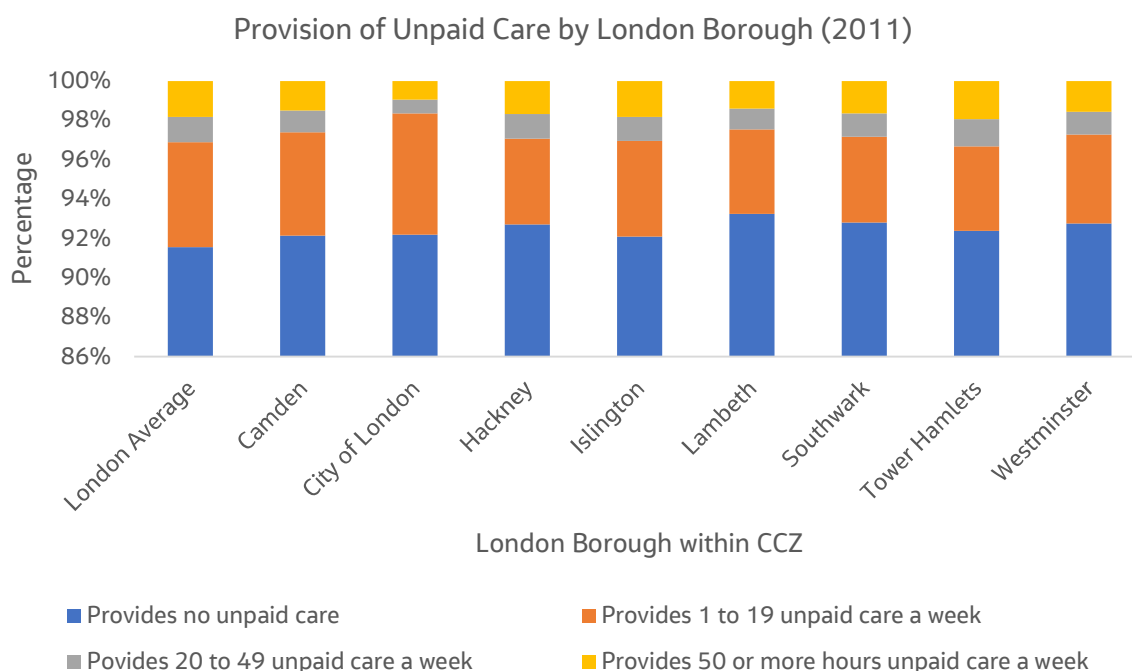


Figure 10-15: Provision of unpaid care by London Borough (NOMIS 2011)



E.3.5 Access to work and training

In London, the Central Activities Zone (CAZ) is one of the most globally competitive business locations, is a key driver of both the London and UK economy. Boroughs with a part in the CAZ have grown strongly in recent years in comparison with boroughs in inner and outer London. The boroughs within the CAZ are Camden; Hackney; Islington; Kensington and Chelsea; Lambeth; Southwark; Tower Hamlets; Wandsworth; and, Westminster. The most represented occupations within the CAZ are high skilled jobs in the scientific and technical sector, finance and insurance, information and communication, and business administration and support services (Mayor of London, 2016). Unemployment levels in London are higher than at national rates and as with large cities the labour market can be more challenging specifically for disadvantaged Londoners. This hardship is especially true for young adults and those from low income families who struggle to access jobs in the first place or develop desired skills (London Datastore, 2021).

Cumulative material wealth provides increased opportunities for participation in society and improves access to healthier lifestyle choices, which are directly linked with improved physical and mental health. Being in employment is related with social and psychological wellbeing, with work being one of the core aspects of individual identity and social status (Wadell, 2007). Unemployment is an important risk factor for physical and mental health and is a major contributor to health inequalities within society. The 2010 Marmot Review concluded that employment is important in protecting an individual's health and wellbeing. The London Health Commission's report *Health in London: Review of the London Health Strategy High Level Indicators* (2005) describes how unemployment is linked with injuries, morbidity, and premature mortality, particularly through higher risk of cardiovascular illnesses. It is also associated with anxiety, depression, self-harm, and even suicide.

According to the Marmot Review 10 Years On (2020), unemployment rates have decreased but increases in employment have often been in low-paid, unskilled, self-employed, short-term, or zero-hours contract jobs.

London suffers from in-work poverty⁵⁰, the latest available data for London's Poverty Profile demonstrates for people living in families where all adults work full time is 9 per cent in comparison with 6 per cent ten years ago. For individuals living in families where one or more adults work part-time it is 49 per cent, compared with 41 per cent a decade ago (Trust for London, 2020).

Zero-hours contracts are contracts that do not guarantee a minimum number of paid hours. They are an insecure form of income which is often detrimental to health, particularly for those in low paid jobs. Evidence suggest that short-term, or no, contracts lead to increased anxiety which is harmful to health. In London more than three-quarters of those working on zero-hour contracts earned less than the London living wage (Durcan, 2015). Furthermore, there are higher numbers of individuals on this type on contracts in lower skilled and lower paid jobs compared to higher skilled and better paid occupations. The negative health impacts of zero-hours contracts will be higher in manual occupations, contributing to increase health inequalities. There is also evidence that adverse work conditions are more common among ethnic minority groups. Workers from minority ethnic backgrounds are more likely to be on zero-hours contracts than white workers. Similarly, there are age differences with a larger number of 16–24-year olds and over-65s are on zero hours contracts in comparison to other age groups.

E.3.6 Social integration and inclusive design

The Mayor's Transport Strategy defines social integration as *'The building of strong communities where all Londoners can lead interconnected lives and play an active part in their city and the decisions that affect them. This can only be achieved by working to prevent, identify and remove inequalities and barriers that prevent people from engaging in their communities and wider society, while recognising the important role played by interaction and participation in overcoming these.'* Within a community, social integration creates social networks which can reduce isolation and enable people to cope with illness. Community disruption and adverse impacts on access to community facilities can result in negative effects on human health. Therefore, increased trust and belonging contribute to higher levels of social integration which can help improve health and wellbeing, reduce crime, and increase support for equal rights. This can create a safer, healthier, safer and more equal city (Social integration commission, 2014).

Relationships are important for physical health and psychosocial well-being, and are conceptualised through terms such as social cohesion, social capital, social networks, social integration and social support (Office of Disease Prevention and Health Promotion, 2020). According to The Mayor's Strategy for Social Integration (2018), relationships could be more diverse. Of the population surveyed, 90 per cent of Londoners agree that London is a good place to live and 66 per cent feel a sense of belong to their neighbourhood. In 2015, some 21 per cent of Londoners claimed that all their friends were of the same ethnicity as themselves. Almost a third stated that all their friends were a similar age to themselves and 30 per cent said that all their friends had similar education levels to them (Greater London Authority, 2018).

The European Environment Agency also found that green spaces in urban areas act as hubs for community interactions, foster social integration and reduce social tension, in particular groups that are vulnerable to social exclusion (Institute for European Environmental Policy, 2016). Moreover, access to public spaces can provide an arena for building social capital, whereby groups can meet to collaborate on joint projects, fostering social networking and cohesion. Perceptions of quality and character in a neighbourhood are positively associated with sense of community and place attachment (Dempsey, 2008). Disruption effects can discourage users from accessing certain facilities, or using certain open spaces or footpaths, which could lead to potential feelings of isolation or a loss of sense of community. These can accumulate and create indirect health effects for residents within these communities.

Improving social integration involves supporting greater participation and accessibility to services. Thus, to achieve social integration it is important to reduce barriers that affect certain groups and addressed inequalities

⁵⁰ In-work poverty occurs when a working household's total income does not meet their needs.

within in the city. Increased inequalities and reduced public spending on those most in need represent significant challenges for social cohesion. Public spending cuts put community services under strain, which results in people feeling threatened by migration. Moreover, community-led, and voluntary organisations, play a vital role in endorsing social integration, are also challenged by funding cuts (Greater London Authority, 2018). There are large gaps and differences between people's everyday experiences of their education, housing, childcare, work, and access to opportunities. These gaps make it more difficult to create an understanding between communities and they increase distrust among individuals (Gould and Hijzen, 2017).

E.3.7 Crime reduction, community safety and road traffic accidents

Crime reduction and community safety

Neighbourhood safety has repeatedly been shown to be associated with the health and well-being of the residents. A recent ONS report on Measuring National Wellbeing recognised crime as a key factor in determining wellbeing (Randall, 2012). In the 2008 Place Survey 61 per cent respondents identified low levels of crime as a contributor that makes an area a good place to live (Department for Communities and Local Government, 2008). There is also a relationship between crime, fear of crime and feelings of safety (Putrik, Amelsvoort, & Mujakovic, 2019). The effects of crime on health include both direct effects, for instance through violence, and indirect psychological and social effects resulting from fear of crime. Fear of crime can appear through symptoms such as stress, sleeping difficulties, loss of confidence, loss of appetite and health harming 'coping' mechanisms such as alcohol consumption and smoking (Hirschfield, 2003). This is further supported by Sttaford et al. (2007) who found that participants that reported high levels of fear of crime were 50 per cent more prone to display symptoms of common mental health issues with more than 90 per cent more likely to exhibit signs of depression than those with the lowest levels.

A 2016 London Assembly Report 'Crime on Public Transport' found that crime on public transport in London is falling, with the overall number of crimes and victims of crime across TfL's public transport network on a downward trend. However, a rise in violence and sexual offences was reported. It was noted despite general progress, fear and perceptions of crime can act as a deterrent against people using public transport even if the actual levels of crime are much lower.

Women made up 50 per cent of London's population in 2018, but 59 per cent of trips at night are by men compared with 49 per cent during the day (Transport for London, 2019), suggesting barriers exist which dissuade women from travelling in the evening. A 2012 TfL Report 'Understanding the travel needs of London's diverse communities: Women' found that:

- Concerns over crime and anti-social behaviour affect the frequency of travel 'a lot/a little' after dark for 65 per cent of women compared to 45 per cent of men
- Women are less likely to feel safe when travelling after dark; feelings of safety from crime and anti-social behaviour are lower for women when considering daytime and night-time travel
- The difference between how safe men and women feel is most apparent for walking after dark with 49 per cent of women claiming they feel safe doing so compared to 73 per cent of men
- Women (of all ages) are less likely to use un-booked minicabs with 15 per cent claiming they are likely to do so in future compared to 32 per cent of men.

In the same report, women surveyed cited crime and personal safety as a barrier to using public transport more often, as well as concerns about anti-social behaviour; fear of crime on the bus/train and getting to the bus/train; fear of terrorist attacks; and risk of accidents.

According to the 2012 TfL survey previously mentioned, the most cited reason for not using public transport for both men and women was overcrowding on transport services. This factor could have additional safety

implications today due to concerns around coronavirus transmission. Londoners who would usually utilise public transport to enter the CCZ may have switched to private vehicle during the coronavirus pandemic due to government guidance advising to avoid public transport where possible. Following the easing of restrictions many people may still have concerns over contracting the virus on public transport. Despite the success of the vaccination programme the fear of coronavirus variants could prevent people from returning to public transport in the short-medium term.

Research from the DfT's National Travel Attitudes Study shows that respondents are most concerned for their health when using transport modes that involve contact with other passengers, particularly modes which require them to sit or stand with other passengers. However, studies have suggested that the virus transmission risk is relatively low, and transport operators have been working hard to minimise it further. Respondents feel less concerned when using personal cars, bicycles and walking (Transport for London, 2020).

A study by Transport Focus undertaken in July 2020 found that *'Three in 10 'don't feel safe using public transport at the moment' and four in 10 disagree with the statement 'I have few concerns about using public transport now if I have the need to do so'. Those who used to be regular public transport users before the lockdown are no less concerned.'* However, the survey results showed that for those actually making journeys by public transport, around eight in 10 bus and train passengers were satisfied with their journey overall, suggesting a gap between the views of those who are travelling by public transport and being content with the experience, and those who are not. Seven in 10 people say they will feel safer using public transport with passengers wearing face coverings, of those travelling, around one in four are dissatisfied with the number of people wearing face coverings when they made a journey (Transport Focus, 2020).

Road traffic collisions

The Mayor's Vision Zero Action plan sets targets of a 65 per cent reduction in all persons killed or seriously injured on London's roads by 2022, and a 70 per cent reduction in people killed or seriously injured by a bus by 2022. In the MTS, buses are highlighted as having a key role in reducing traffic and making streets safer and easier to cross and are also safer for occupants than cars (Mayor of London, 2018). Road danger disproportionately affects those travelling on foot, by bike, or on motorcycles, with 80 per cent of all those killed or seriously injured on London's roads travelling by these modes (Mayor of London, 2018).

As shown in Table 10-14, regarding the indicator 'killed or seriously injured on roads', most boroughs in London perform better than the national average. However, all boroughs within the CCZ perform worse than the England average. Westminster is the worst performing borough with 97.4 casualties and serious injuries, in comparison to the 42.6 England average. This is likely to be due to the large number and density of daytime and night-time pedestrians and cyclists using the roads in central London.

Overall, in 2019 there was a decline in the number of individuals killed or seriously injured on London's roads compared to the 2005-09 baseline. The rate of the decline has slowed since 2014 but there was a 4 per cent reduction compared to 2018 (Travel in London, 2019). Additionally, in 2019, 26,102 people were slightly injured while travelling on London's roads; a two per cent reduction on 2018, with the greatest difference being a 19 per cent reduction among bus and coach passengers (Travel in London, 2020).

There are substantial disparities in the proportion of casualties between women and men for different types of travel. In 2018, women accounted for 36 per cent and men for 64 per cent of total casualties. Men accounted for 93 per cent of motorcyclist fatalities, and on average made 84 per cent of total motorcycle journeys in 2018/19. Despite reductions in motorcyclist deaths, motorcyclists continue to make up a disproportionate number of deaths and serious injuries (Travel in London, 2019). For cyclist casualties in London, men accounted for 76 per cent of the total, with 73 per cent of all cycle journeys being made by men (Travel in London, 2019).

E.4 Health Inequalities

An increasing number of the UK population live with long-term conditions, and the NHS spends significant time treating individuals with conditions that are an outcome of social determinants (Marmot review, 2020). In England, the cost of treating illness resulting from health inequalities has been projected at £5.5 billion per year. In addition, health inequalities lead to productivity losses of between £31–33 billion each year (Public health England, 2015).

The 2010 Marmot Review described how having access to transport allows access to work, education, social networks and services that improve individual's opportunities and overall community cohesion; conversely, not having good transport access increases inequalities in a range of the social determinants of health. The review also states that the Government's prioritisation of road and train travel over buses since 2010 has also exacerbated inequalities, as road and rail services are used less by those on low incomes, who depend on buses more. The Government's Transport Analysis Guidance (2003) also states that some transport users such as disabled people and mothers with young children, may experience more difficulties in accessing and egressing public transport.

Health inequalities seem to affect children the most and are shaped by levels of deprivation and broader socio-economic aspects. Marmot et al. (2010) found that children's life opportunities are shaped by the economic, social, and environmental conditions in which they grow. Experiences in early childhood are the foundation for physical, emotional, and intellectual development. These are then reflected on differences on health outcomes such as birth weight, eye health, oral health, and obesity. Moreover, health impacts resulting from social disadvantages continue to accumulate during children's lives, further exacerbating health, social and economic inequalities.

Research shows a strong link between health and social status. Living in disadvantaged areas is related with a greater risk of poor mental and physical health (Public Health England, 2017). Poor health also makes it more difficult for adults to obtain work and to be productive, having a negative impact on income throughout their lives. Living on a low income also limits individuals' ability to afford a basic healthy standard of living which includes nutritious food, fuel for heating and appropriate quality and affordable housing (Marmot et al., 2010). Having a low-income also increases the probability of living in an area with lower quality green or public spaces and poorer air quality. According a report on Health Inequalities in London (Public Health England, 2015), people in the most deprived decile in England are twice as likely to die from respiratory disease under 75 years in comparison with people in the least deprived decile.

People living in more deprived areas can be exposed to higher concentrations of air pollution and higher noise levels, often because homes and residences of these groups are situated next to busy roads with higher concentrations of emissions. Research has demonstrated that deprived populations living in areas that are exposed to high levels of air pollution, or are exposed over a long duration, will assuredly experience the worst effects (University of the West of England, 2017). Studies also suggest that more advantaged communities are not as likely to suffer pollution-related health impacts as poorer communities, even where the advantaged communities live in more polluted areas (University of the West of England, 2017). This may be due to a combination of factors including better pre-existing health status and the ability to afford better healthcare and lifestyle goods.

Regarding poor air quality, children (aged up to 14 years) and older people over 65 years are deemed more susceptible to the impacts of pollution; pregnant women are also a vulnerable population due to potential harmful impacts on the unborn foetus and evidence regarding adverse birth outcomes (Guo L.Q et al, 2019). Studies on the impacts of air pollution on people living in London were undertaken by Aether on behalf of the Greater London Authority (GLA) in 2013, 2017 and 2019. The 2013 and 2017 studies found that populations living in the most deprived areas were on average more exposed to poor air quality than those in less deprived areas and sought to understand inequalities in access to clean air in London (Aether, 2017). The aim of Air

Pollution Exposure in London: Impact of the London Environment Strategy (2019) study was to investigate the impact of future policy on inequalities in exposure. The key outcome of the analysis indicated that the London Environment Strategy was projected to make significant progress in removing inequality associated with poor air quality (Aether, 2019).

Children living in deprived areas are also more likely to be exposed to higher levels of air pollution. The Updated Analysis of Air Pollution Exposure in London (2017) found that in 2010, there were 1777 primary schools in London of which 433 were in locations where average concentrations exceed the NO₂ EU limit value. Of these 433 primary schools, 82 per cent were deprived schools. As part of the Mayor's School Air Quality Audit Programme Report (2018) it was found that an average 23 per cent of the children attending the 50 schools audited as part of the air quality audit programme qualified for free school meals. In some cases, this was as high as 43 per cent, though at other schools in the programme it was as low as 3 per cent (Mayor of London 2019, p.38).

A study by Living Streets (2021) found that deprived ethnic minority pedestrians are over three times more likely to be a casualty on Britain's roads than white non-deprived pedestrians, with both ethnicity and income playing a part in the inequality. National Travel Survey data shows that people living in lower income quintiles make more journeys by walking as they are less likely to have access to a car (Living Streets, 2021), meaning they are exposed to road traffic more frequently. The Living Streets study recommended that further work be undertaken to explore how risks differ amongst different ethnic minority communities.

E.5 Protected Characteristic Groups and Low Income Londoners

This section outlines the baseline conditions for each PCG considered in the assessment.

E.5.1 Age

Table 10-15 shows the age profile of Central London residents from 2017 to 2019. The 25-44 age category had the greatest proportion of population across the three years, followed by the 17-24 and 45-59 age categories. In 2019, the 0-4, 05-16 and 60-64 age categories had the lowest proportion of population.

Table 10-15: Age breakdown of central London residents (LTDS, 2017 - 2019)

Age	Average (Years 2017 – 2019)
0-4	4%
05-16	10%
17-24	18%
25-44	34%
45-59	18%
60-64	4%
65+	12%

Table 10-16 provides a breakdown of the different methods of travel used by Londoners once a week specific to younger and older people. It is evident that the most common method for both demographics is walking however this is consistent across all London's population. The use of bus is highest amongst the 11-15 and 16-24 age groups, with 65+ recording slightly lower although being greater than the London average. Travelling by

car (as a driver) for 65-79 age groups is greater than the lower average but then reduces to below the average for those 80+.

Table 10-16: Proportion of Londoners using types of transport once a week – by age (TfL 2019a)

% Transport Type	Age						
	All Population	5-10	11-15	16-24	65-69	70-79	80+
Walking	95%	97%	98%	96%	94%	90%	73%
Bus	59%	44%	75%	76%	67%	68%	56%
Car (as passenger)	44%	75%	72%	48%	39%	41%	43%
Tube	41%	14%	16%	52%	36%	28%	15%
Car (as a driver)	38%	-	-	15%	54%	45%	25%
National Rail	17%	3%	7%	19%	16%	12%	5%
Overground	12%	4%	6%	15%	9%	6%	3%
Other taxi/minicab	10%	4%	3%	14%	5%	5%	7%
DLR	5%	2%	3%	7%	2%	2%	2%
London taxi/minicab	3%	0%	1%	2%	2%	2%	3%
Trams	2%	2%	4%	3%	3%	2%	1%
Motorbike	1%	-	-	1%	1%	-	-

E.5.2 Disability

According to the Family Resources Survey in 2019 to 2020, 1.3 million people in London had a disability (DfW&P 2020). As shown in Table 10-17, in 2019, 7 per cent of London residents identified as having a disability which limited their ability to travel. A reason for this may be as a result of the difficulty using public transport, with 45 per cent of disabled Londoners in 2018 finding planning and making trips on public transport stressful (TfL 2019b).

Table 10-17: Central London residents who have a disability which limits travel (2017/18 -2019/20) (LTDS)

Disability which limits travel	2017 – 2019 Average	
	Count*	%
Yes	15,086	7%
No	195,400	93%

*sample does not include those who did not answer

Table 10-18 shows the breakdown of transport methods used at least once a week by disabled people compared to non-disabled people. The most common method for disabled people was walking (81 per cent), although being less than those without a disability (96 per cent). Bus travel for disabled people was similar to non-disabled levels, however beyond 65 years of age, use of bus travel decreases for disabled people and increases for the non-disabled aged 65+. Use of a car as a passenger was similar, however those without disabilities recorded higher levels of using a car once a week than disabled people. These trends show a greater uptake of bus, walking and being a passenger of a car for disabled people.

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Table 10-18: Proportion of Londoners using types of transport at least once a week (2016/17) (TfL 2019a)

Method of Travel	Disabled	Disabled 16-64	Disabled 65+	Non-disabled	Non-disabled 65+
Walking	81%	88%	70%	96%	95%
Bus	58%	64%	48%	60%	72%
Car (as a passenger)	42%	40%	41%	45%	41%
Car (as a driver)	24%	26%	25%	39%	52%
Tube	21%	30%	13%	43%	35%
National Rail	9%	12%	5%	17%	15%
Overground	7%	10%	3%	12%	8%
Other taxi/minicab (PHV)	10%	12%	8%	10%	4%
London taxi/black cab	3%	3%	3%	2%	2%
DLR	3%	5%	2%	5%	1%
Tram	2%	3%	1%	2%	2%
Motorbike	-	1%	-	1%	1%
Net: Any public transport (bus, Tube, National Rail, DLR, London Overground, tram).	61%	69%	52%	74%	78%

In relation to blue badge holders, in 2018/19 there were 227,000 blue badge holders in London, this was a decrease of 3.7 per cent from 2017/18 (DfT 2019). Those eligible for a blue badge in England qualify through the higher rate of the mobility component of the Disability Living Allowance (DLA) or meet the moving around criteria (8 points or more) or the journey planning criteria of the Personal Independence Payment (PIP). In 2020, 105,722 people in London who held valid Blue badges qualified through the Higher Rate Mobility Component of the Disability Living Allowance or met the moving criteria of the Personal Independence Payment or Journey planning criteria of the PIP (DfT 2020). In 2019 eligibility for blue badges in England was extended to people with hidden disabilities (including anxiety disorders or a brain injury). Although there is no strict differentiation between a hidden or visible disability, a hidden disability is defined as '*a disability that may not be immediately obvious*' (Hidden Disabilities, Online).

Disabled people in London are more likely to live in households with less than £20,000 annual income, 61 per cent compared to 25 per cent of non-disabled Londoners. This is more applicable for those aged 25-64 with 58 per cent in this age category living in a low-income household compared to 19 per cent of those without a disability within this age category (TfL 2019a).

A study undertaken by the King's Fund found that in 2019/20, there was a decrease in the number of people in England receiving long-term care, from 842,000 to 839,000. However, the number of people asking for social care support from their councils increased in 2019/20 from 1.91 million to 1.93 million (King's Fund, 2021). Additionally, analysis undertaken as part of the 'State of Adult Social Care in London' report found that London can expect the demand on adult social care to increase in the coming decades as a result of growth among vulnerable population groups (London Councils, 2019).

Unpaid carers make up a large proportion of the care force. The King's Fund Study found that '*unpaid carers – usually, but not always, family members – contribute the equivalent of four million paid care workers to the social care system. Without them, the system would collapse. The charity Carers UK estimates that carers in*

England have contributed more than £400 million of care each day since the start of the Covid-19 pandemic. ' (King's Fund, 2021)

E.5.3 Race/Ethnicity

Figure 10-16 provides a breakdown of the population of Greater London residents for different ethnic groups in 2018. In 2018, 59 per cent of the Greater London population were of white ethnicity, followed by those identifying as Asian (18 per cent), Black (12 per cent) and Mixed/Other (11 per cent).

The diversity of the Central Activity Zone, and the importance of this to the economic and cultural success of London has recently been acknowledged in a report to the GLA (Arup et al, 2021). This highlights the importance of access of employers in the CAZ to a wide range and diversity of workers to its success, but it also acknowledges that the CAZ workforce is less ethnically diverse than its resident population due to the volume of commuters from less diverse areas of the UK.

Figure 10-16: Ethnicity of greater London residents in 2018 (ONS 2018)

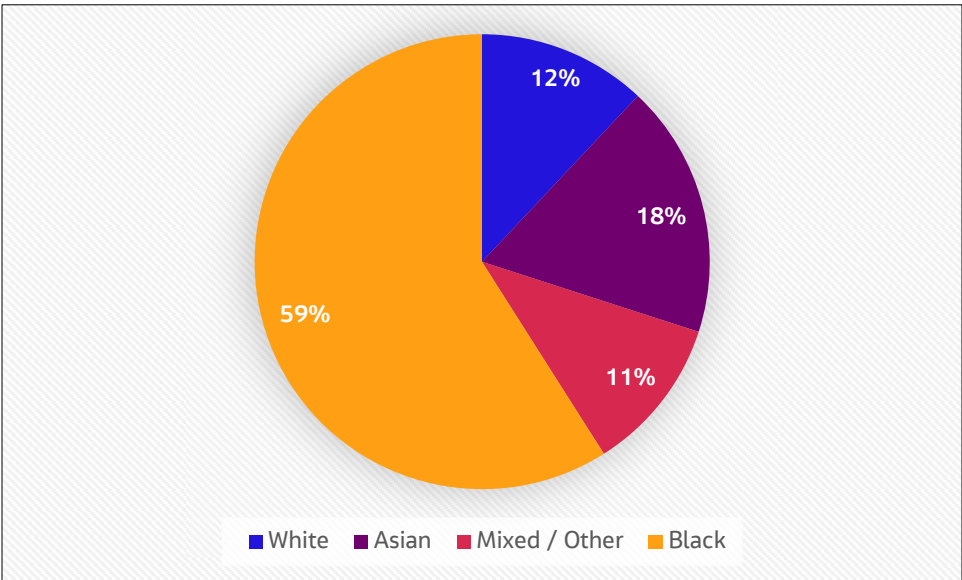


Table 10-19 provides a breakdown of Londoners using different types of transport at least once a week by ethnicity. It is evident that a greater number of Londoners from black, Asian and minority ethnic backgrounds travel by bus once a week than white Londoners who, however, recorded greater levels of car use as a driver.

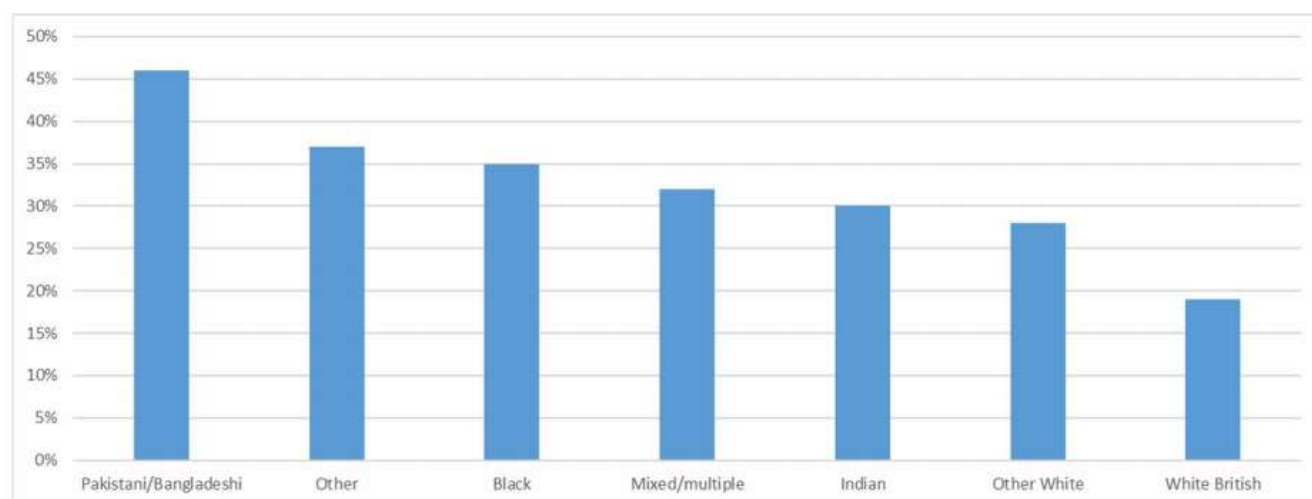
Table 10-19:Proportion of Londoners using types of transport at least once a week – by ethnicity (2016/17) (TfL 2019a)

Method of travel	Ethnicity						
	All	White	Black, Asian and minority ethnic	Black	Asian	Mixed	Other
Walking	95%	95%	96%	96%	96%	94%	93%

Method of travel	Ethnicity						
	All	White	Black, Asian and minority ethnic	Black	Asian	Mixed	Other
Bus	59%	56%	65%	73%	59%	64%	66%
Car (as passenger)	44%	43%	46%	41%	50%	51%	40%
Car (as a driver)	38%	41%	32%	24%	36%	27%	29%
Tube	41%	43%	37%	36%	36%	38%	41%
National Rail	17%	19%	13%	16%	11%	16%	8%
Overground	12%	12%	12%	15%	9%	14%	11%
Other taxi/minicab (PHV)	10%	11%	8%	10%	6%	11%	8%
London taxi/black cab	3%	3%	1%	1%	1%	1%	5%
DLR	5%	5%	7%	7%	6%	9%	2%
Tram	2%	2%	2%	4%	2%	3%	0%
Motorbike	1%	1%	0%	0%	0%	1%	1%

Figure 10-17 shows the proportion of employees who are paid below the London Living Wage by ethnicity between 2014-16. The greatest number of employees paid below the London Living Wage identified as Pakistani/Bangladeshi with a proportion of over 45 per cent.

Figure 10-17: Proportion of employees paid below the London living wage, by ethnicity, London, 2014-16 (GLA 2019)



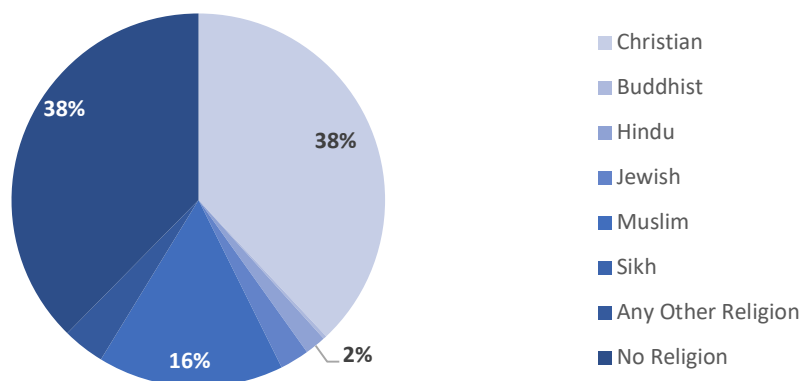
E.5.4 Pregnancy and maternity

In 2018, out of a total 121,000 births in Greater London, 25,000 were in boroughs in the CCZ (GLA 2019b). The General Fertility Rate (GFR) for Greater London was 60.1 compared to an average of 47.7 for boroughs within the CCZ. There are two maternity hospitals located within the zone (Guy's Hospital and St Thomas').

E.5.5 Religion or belief

Figure 10-18 shows the share of the population of the CCZ holding different religious beliefs. In 2011, the majority identified as Christian (38 per cent), followed by Islam (16 per cent). 38 per cent of the population identified as having no religion. These proportions are consistent with the Greater London average. Figure 10-14 (above) maps the different places of worship located within the CCZ.

Figure 10-18: Religion of CCZ boroughs (GLA 2019c)



E.5.6 Sexual orientation

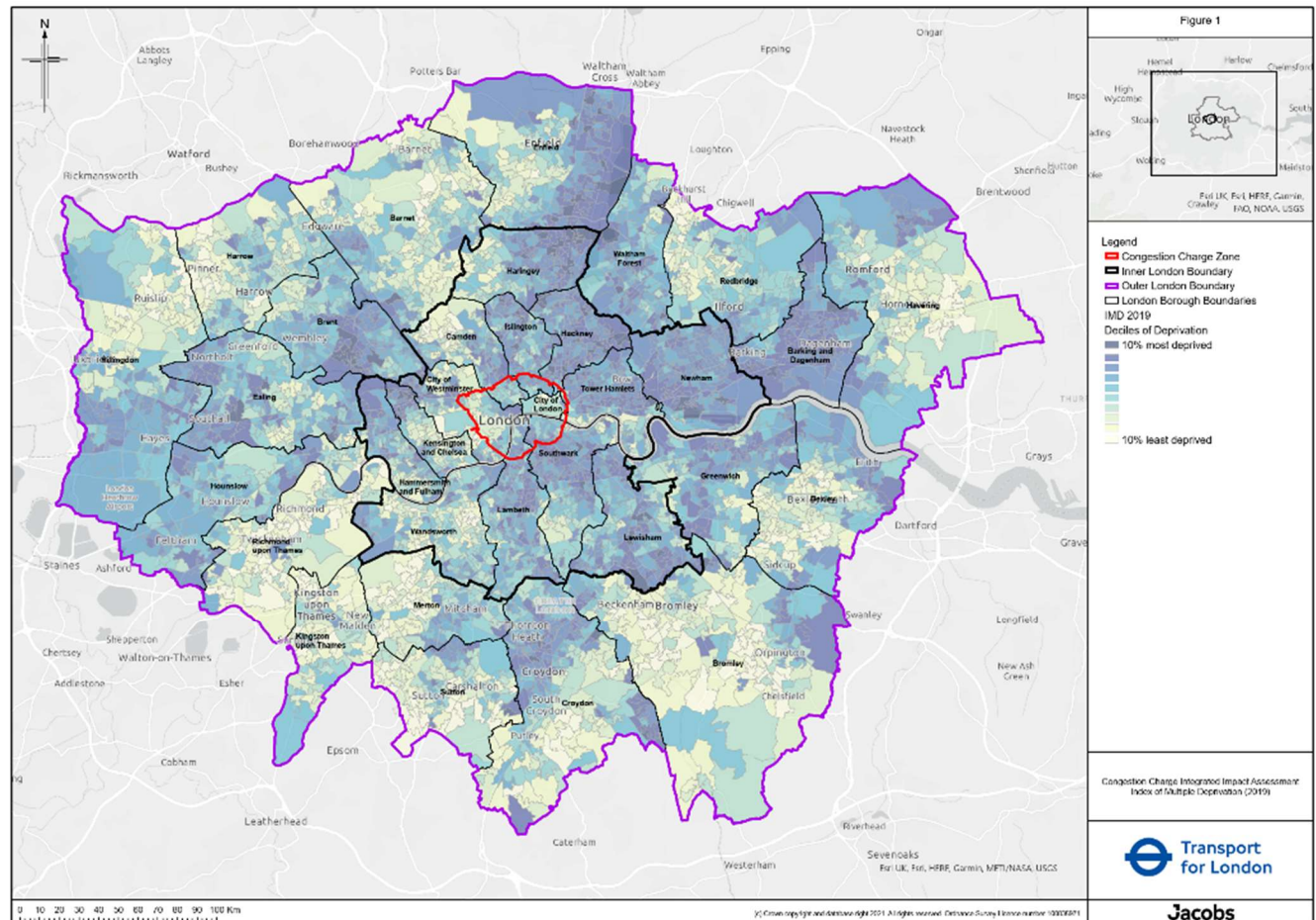
Data on the sexual orientation is not readily available within the national census. However, according to the Office for National Statistics in 2016, London recorded the largest proportion of population in UK regions who identified as lesbian, gay or bisexual (LGB), with 2.7 per cent of the population (ONS 2017). This may be attributed to the younger demographics of the population living in London compared to the rest of the country. Culturally central London is known to play a vital role in the LGBTQ+ community, not least as home to the vast majority of night time venues specifically catering from these groups.

E.5.7 Socio-economically deprived people / low income Londoners

Figure 10-19 maps 2019 Index of Multiple Deprivation (IMD) levels within the London in relation to the CCZ, Inner London, and Outer London. The most deprived areas within the CCZ are located towards the periphery of the CCZ, with wards located within the City of London recording the lowest deprivation levels. However, as acknowledged by Arup (2021) a lot of people from London's most disadvantaged communities depend on jobs in central London.

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Figure 10-19: 2019 IMD of CCZ Boroughs (OpenStreetMap, accessed 2021)



In relation to the methods of travel used by those in deprivation, Table 10-20 shows the proportion of Londoners using all types of transport at least once a week in 2016/17. Other than walking, Bus travel records the greatest proportion (69 per cent) of those earning less than £20,000. 23 per cent of those earning less than £20,000 use a car once a week, however it not known whether the use of this vehicle is to enter the CCZ.

Table 10-20: Proportion of Londoners using all types of transport at least once a Week (TfL 2019a)

Method of Travel	Income						
	All Londoners	All less than £20,000	less than £5000	£5000-£9,999	£10,000 - £14,999	£15,000 - £19,999	£20,000 - £24,999
Walking	95%	93%	91%	92%	93%	95%	95%
Bus	59%	69%	70%	71%	69%	68%	63%
Car (as a passenger)	44%	38%	35%	37%	37%	41%	44%
Car (as a driver)	38%	23%	16%	20%	26%	27%	32%
Tube	41%	32%	36%	30%	29%	36%	36%
National Rail	17%	11%	11%	11%	9%	11%	15%
Overground	12%	11%	10%	13%	8%	11%	11%

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Method of Travel	Income						
	All Londoners	All less than £20,000	less than £5000	£5000-£9,999	£10,000 - £14,999	£15,000 - £19,999	£20,000 - £24,999
Other taxi/minicab (PHV)	10%	9%	9%	10%	7%	10%	8%
DLR	5%	5%	5%	5%	6%	6%	7%
Tram	2%	2%	2%	1%	3%	4%	3%
Motorbike	1%	1%	1%	-	1%	1%	1%

Appendix F. Economy Baseline

F.1 Introduction

This appendix sets out the baseline information gathered in relation to:

- Jobs in the CCZ
- Travel in the CCZ
- Vehicle Trips in the CCZ.

F.2 Jobs in the CCZ

The CCZ has the highest level of job density within London, supporting approximately 1.8m jobs. A breakdown of jobs by economic sector is given in Table 10-21.

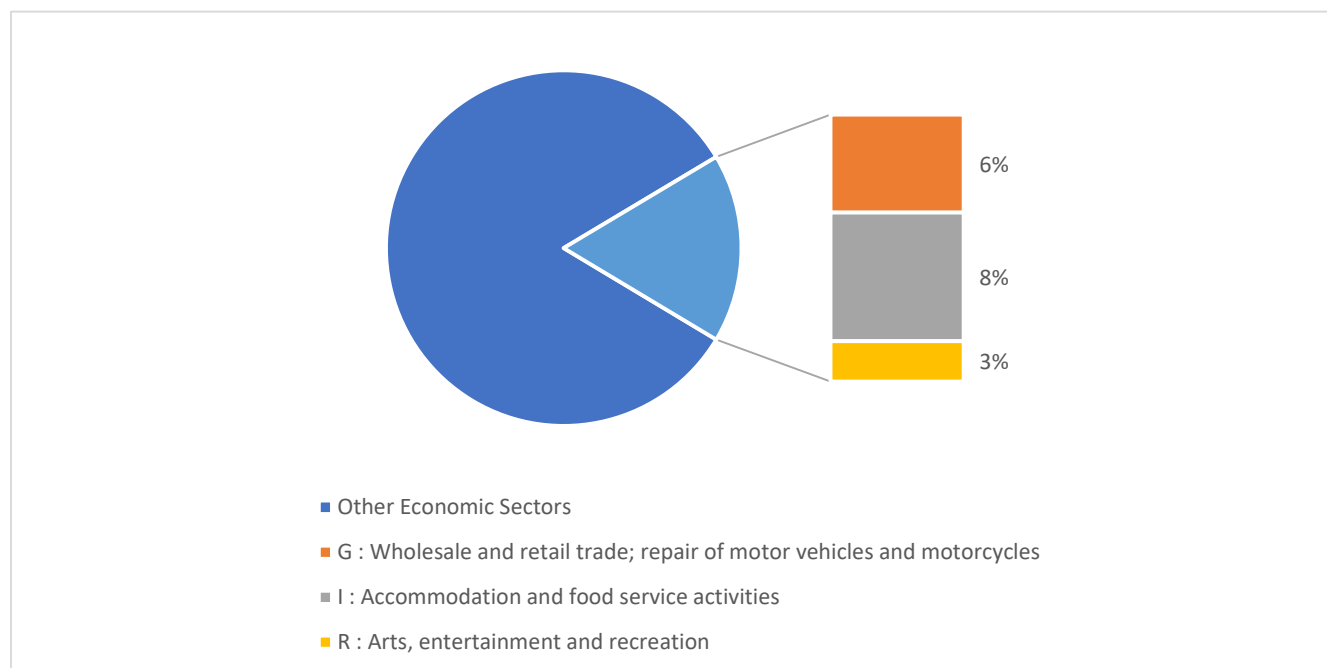
Table 10-21: Jobs in CCZ by economic sector

Job Category	Jobs within CCZ	% of Total jobs
Agriculture, forestry and fishing	500	0.03%
Mining and quarrying	800	0.05%
Manufacturing	15,700	0.87%
Electricity, gas, steam and air conditioning supply	5,900	0.33%
Water supply; sewerage, waste management and remediation activities	1,700	0.09%
Construction	39,300	2.17%
Wholesale and retail trade; repair of motor vehicles and motorcycles	114,200	6.31%
Transportation and storage	28,400	1.57%
Accommodation and food service activities	150,000	8.29%
Information and communication	209,800	11.59%
Financial and insurance activities	266,200	14.71%
Real estate activities	53,000	2.93%
Professional, scientific and technical activities	380,800	21.05%
Administrative and support service activities	199,300	11.02%
Public administration and defence; compulsory social security	86,600	4.79%
Education	67,900	3.75%
Human health and social work activities	95,900	5.30%
Arts, entertainment and recreation	46,700	2.58%
Other service activities	46,600	2.57%
Total	1,809,300	100.00%

Source: Business Register and Employment Survey

The majority of these jobs are in sectors which are unlikely to be affected by the Proposed Changes. They are in sectors which are typically not reliant on highway transport for employee or customer access (when based on central London), or (where applicable) they will already be paying under the current congestion charging scheme – as the majority of employees, customers and suppliers who access the CCZ by vehicle currently do so during the existing charged periods. The economic sectors which are most likely to be impacted are retail, hospitality and leisure activities, shown in Figure 10-20, based on the data from Table 10-21. These are sectors which are public facing and experienced significant trade at the weekend when the pre-June 2020 temporary charges did not apply.⁵¹

Figure 10-20: Economic sectors with higher potential for impact as a result of the Proposed Changes



Source: Business Register and Employment Survey

In total sectors most likely to be impacted by the Proposed Changes support approximately 310,000 jobs within the CCZ (approximately 17 per cent of total employment). Important to note is that not all of these jobs will be impacted. As discussed in 6.2, and detailed in Figure 10-21, the vast majority employees will already access their work through public transport, cycling and walking even when travelling at times when the pre-temporary charges did not apply.

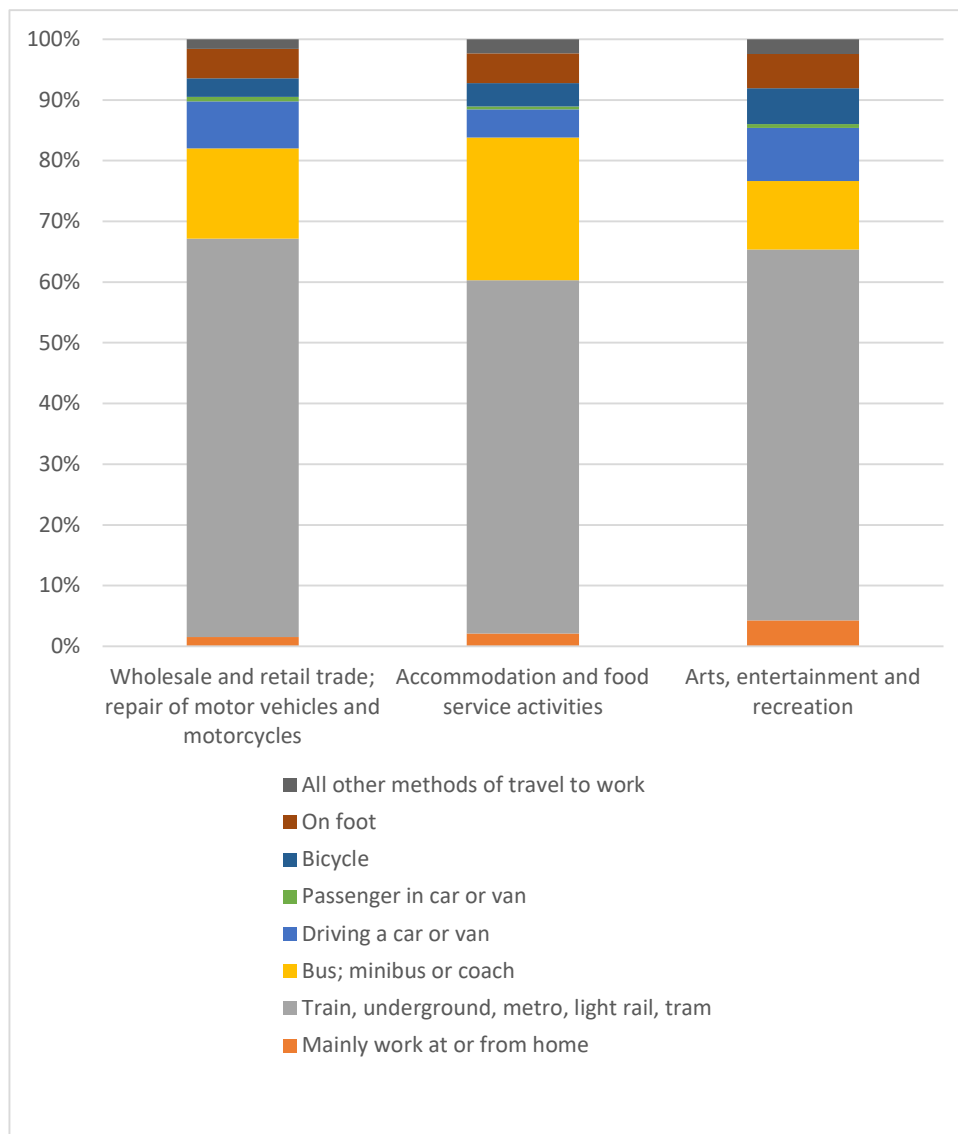
F.3 Travel in the CCZ

Commuting into the CCZ is typically done by public transport. Figure 10-21 gives the split by travel mode for the three sectors identified as at higher risk of impact as a result of the Proposed Changes. Since the 2011 census

⁵¹ ONS data on the nighttime economy (<https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/adhocs/008001numberofworkplacesinthenighttimeeconomyinlondonboroughsandmiddlelayersuperoutputareasmsoas2001to2017>) suggests that in MSOAs within the CCZ

there has been a steady decline in the number of cars entering the central area and hence the proportion of people commuting by car into the CCZ has declined so this section presents a worse case position.

Figure 10-21: Method of transport for commuting



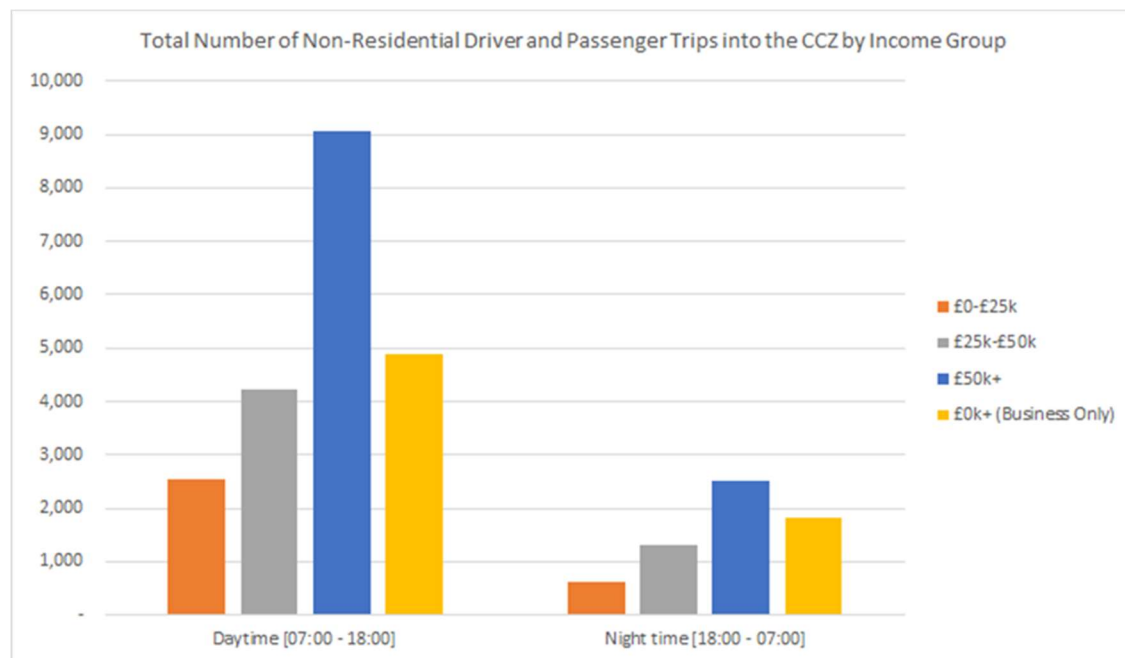
As shown the vast majority of people working in these sectors commute to work by public transport, over 70 per cent and in the case of accommodation and food services over 80 per cent. Only around 10 per cent of individuals travel to work by car, van, taxi or PHV. Many of these will already be subject to the present charge and in almost all cases there are alternative public transport services available.

In 2019 there were 19,000 licensed taxis and 96,000 licensed PHVs within London. The last full year for which data is available prior to the coronavirus pandemic, and which gives a better representation of the long-term situation. During the pandemic some operators opted to declare vehicles 'off-road' (due to lack of demand), and so are not included within the most recently available data. Using this data could underrepresent the potential impact to the PHV and Taxi sector.

Data on entries into the CCZ for 2019 suggest that approximately 30 per cent of PHVs entered the CCZ on a given weekday. There were ~34,000 unique entries by PHV on a Saturday, and ~31,000 on a Sunday. Of these 74 per cent and 70 per cent respectively entered between 0700 and 2200.

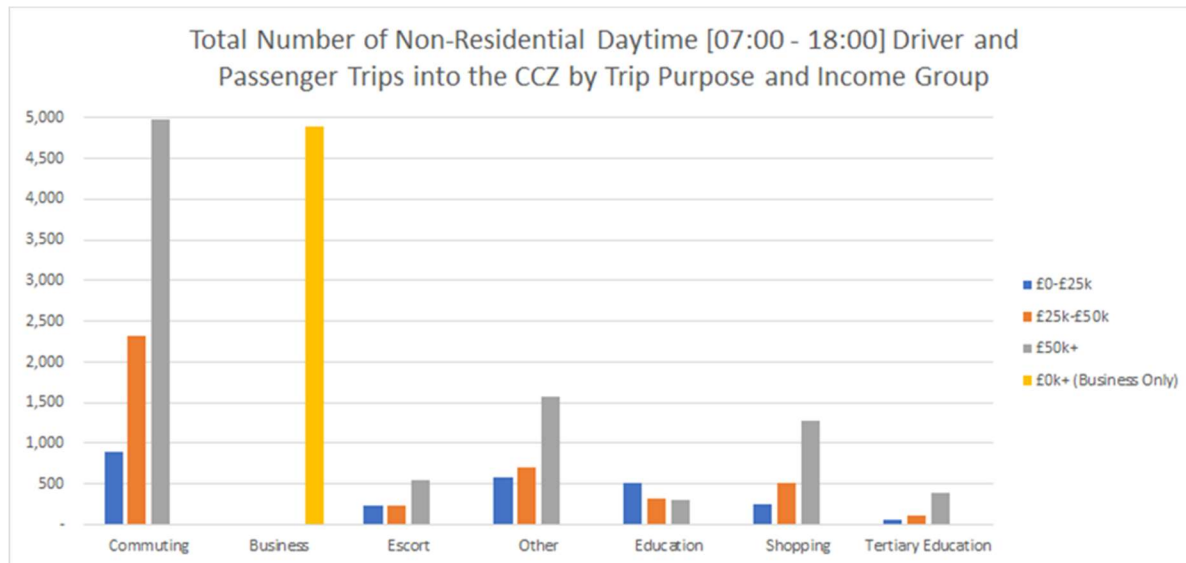
Data on journey purpose of car trips into the CCZ by non-residents has been obtained from TfL's Modular MoTioN transport model (base year 2016), and is shown in Figure 10-22 and Figure 10-23. Figure 10-22 shows the profile of daytime and night time trips into the CCZ by income group. It is evident that greatest numbers of trips during daytime (charging hours) and night-time (non-charging hours) are by the higher income groups. Figure 10-23 provides breakdown of non-residential trips into the CCZ by journey purpose and income. It can be seen that the number of trips made by drivers or passengers from lowest income groups are lower than the higher income groups for all purposes with the exception of primary and secondary education (for which they account for the greatest number of trips – approximately 500 per day).

Figure 10-22: Non-residential driver and passenger trips into the CCZ by income group



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Figure 10-23: Non-residential daytime trips into the CCZ by trip purpose and income group



Travel by London Underground/DLR

Table 10-22 and Table 10-23 details the number of entries and exits from all London Stations within the boroughs of Westminster and City of London in 2017. The data is broken down into weekdays and weekends

Table 10-22: Annual 2017 entries and exits from London stations

Weights	253	52	59
	Sum of Weekday Entry	Sum of Saturday Entry	Sum of Sunday Entry
City of London	424,168	142,797	99,112
City of Westminster	1,002,122	792,199	545,856
Grand Total	1,426,290	934,996	644,968

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Table 10-23: Sum of entries and exits central London stations

Weights	253	52	59
	Sum of Weekday Exit	Sum of Saturday Exit	Sum of Sunday Exit
City of London	429,092	145,899	95,781
City of Westminster	1,010,051	801,693	527,854
Grand Total	1,439,143	947,592	623,635

Table 10-24: Sum of entries and exits (with weightings)

Weights	Sum (product with weights) of Entry + Exit (Millions)
City of London	242
City of Westminster	655
Grand Total	898

The weighting is based on the assumption that seven Bank-holidays are represented by seven Sundays and grossing up to a 364-day year excluding Christmas Day. This adjustment does not change from year to year depending on when the Bank Holidays are but is used as an annual factor for comparing one year with another.

Appendix G. Stakeholder Workshops

G.1 Environment and Health

Friday 9 July 2021

Participants

Better Transport

RNIB

City of London

Living Streets Charity

Barts Health NHS Trust

Southbank London

GMB Union

ADCU

John Lewis Partnership

Night-time industries Association

NHS Confederation

Summary of feedback:

- General improvements to air quality and carbon reduction due to reduced congestion were noted as positive impacts.
- View expressed that air quality assessment should also consider background air pollutants from other sources. River vehicles were noted as a mode of travel that can be more polluting than other modes.
- Concern expressed that the diversion or re-routing of vehicles to avoid paying the Congestion Charge may increase ambient noise and air quality impacts for residents outside the CCZ.
- It was suggested that businesses operating within the CCZ could consolidate deliveries to counteract potential redistribution impacts and reduce vehicle trips further.
- When freight operators have replaced non-compliant vehicles there should be incentives for their use i.e. to allow out of hours deliveries and priority routes for freight deliveries as these are also essential to London's Economy.
- The increase in people choosing to cycle was acknowledged and the Proposed Changes could help to further facilitate this.
- Road space for sustainable modes needs to be prioritised to allow for mode shift to continue. Additional facilities and cycle parking may be required to sustain the increase in the volume of bicycles, adapted bicycles and scooters on the street. Inclusive parking facilities for active travel modes could also be improved in line with the new Cycle Rail parking guidelines.
- It was noted that different groups of people will be affected more than others. Some people may not be able to easily switch to active travel or sustainable modes and may therefore be disproportionately impacted. Additionally, large volumes of cyclists or 'cycle superhighways' can impact on accessibility for pedestrians.

- Disabled people without a Blue Badge who work for schools/local authorities who need to access the CCZ using their own vehicles were identified as being impacted by the Proposed Charges.
- It was highlighted that in central London places of worship will already have been impacted by coronavirus, and that older people and disabled people may find it difficult at the weekend to access the CCZ on public transport due to service disruption. It was noted that City of London/Westminster City Council make parking exemptions at the weekend for places of worship.
- It was noted that obtaining data on how people travel to various facilities within the CCZ would help to identify the scale of impact on particular groups, e.g. on people accessing places of worship.
- People who use taxis/PHVs for access to the CCZ would be financially impacted.
- It was suggested that reimbursements could be made available to people required to travel by motorised vehicle into the CCZ for work due to public transport service disruption at the weekends.
- The potential negative impact on some PHV drivers income was discussed. One suggestion was to shift the cost burden from driver to operator by the introduction of a mandatory flat fee for operators.
- Fewer vehicles on the streets as a result of the Proposed Changes would complement the Low Traffic Neighbourhoods scheme, which may allow more space on the street for pushchairs/wheelchair users to move around.
- It was argued that larger numbers of people walking and cycling as a result of the Proposed Changes may result in an increase in road traffic accidents for these groups.
- More people walking on the streets may have the benefit of making the streets safer, from a crime perspective.
- It was suggested that a transition period be implemented for vulnerable people who do not feel comfortable traveling in crowded public transport during the coronavirus pandemic.

G.2 Equalities

Monday 12 July 2021

Participants

National Institute for the Blind

Guide Dogs for the Blind

Royal Borough of Kensington and Chelsea

John Lewis Partnership

St Peter's Italian Church

ADCU

GMB

Summary of feedback:

- Some religious services in central London cater to specific nationalities or denominations attract worshippers from a wide catchment area. A large proportion of worshippers are older people who are unable to use public transport. Multiple services may be held at weekends with some not finishing until after 12pm.

- Informal care and social visits to vulnerable people by family and friends often takes place at weekends, and if the changes lead to a reduction in these visits it may have impacts on feelings of loneliness and isolation for some older and/or disabled residents.
- PHV drivers disproportionately from BAME communities. Cost burden of Congestion Charge falls on drivers not operators. Is there a way of shifting costs onto operators (e.g. minimum fees for operators)?
- Concern that Proposed Changes will further exacerbate increase in market share of larger operators.
- Anecdotal evidence that some PHV drivers are refusing fares into the CCZ (even though they can be penalised by operators) or terminating trips outside the zone. This includes trips made under the Department of Work and Pensions Access to Work Scheme (for disabled people). Many disabled people who do not qualify for Blue Badge use PHVs.
- Concerns raised about accessibility of website for discount applications.

G.3 Economy and Business

Tuesday 13 July 2021

Participants:

GMB

Musicians Union

Freight Transport Association

Logistics UK

Federation of Small Business

Royal Mail

Baker Street Business Improvement District

Ashford and St Peter's Hospitals NHS Foundation Trust

John Lewis Partnership

British Vehicle Rental and Licensing Association

Summary of feedback:

- Consideration should be given to workers unable to travel by public transport or active travel, for example musicians carrying heavy/bulky equipment, those experiencing public transport disruption, and low-income self-employed delivery drivers.
- Increase in charge will impact on very low margin freight industry, for which many types of journey cannot be rescheduled to avoid the charge (e.g. delivery to construction sites). Absence of legislative requirements is hindering move towards freight consolidation.
- Need to distinguish between immediate post-pandemic situation and longer-term ambition. Concerns that Proposed Changes will impact on short-medium term demand for domestic day trips to London which is seen as a major growth opportunity during the post pandemic recovery. Next 12-18 months is critical for some smaller entertainment, food and drink and retail business.

- Inadequate/inefficient back office function supporting the Congestion Charge, has cost implications for businesses (e.g. vehicle leasing and rental).
- Concern that Proposed Changes will lead to time shifts in vehicle movements and greater congestion before and after the charging period especially at weekends.
- Impact on street traders/markets at weekends and the increased demand for immediate delivery of retail goods could put stores in CCZ at a disadvantage when serving customers outside the CCZ.
- Perception that back office functions e.g. dealing with PCNs were not as efficient as they could be leading to higher costs for businesses.
- Recognised there were benefits from reduced congestion for delivery vehicles within the CCZ.
- Concern that Proposed Changes will lead to further consolidation of the PHV sector.

Appendix H. IIA Objectives Scoping Table

IIA Theme/Topic	Relevant MTS IIA Objective	Proposed Changes IIA Scoped In/Out	Justification
Environment			
Nitrogen Dioxide	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure	In	CCZ objective to reduce number of vehicles travelling through central London should lead to a reduction in emissions.
Particulates		In	
Carbon Dioxide	<p>To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.</p> <p>To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050</p>	In	CCZ objective to reduce number of vehicles travelling through central London should lead to a reduction in emissions.
Energy use and supply	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	Out	No potential impacts identified.
Flood Risk	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	Out	No potential impacts identified
Geology and Soils	To conserve London's geodiversity and protect soils from development and over intensive use	Out	No potential impacts identified

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IIA Theme/Topic	Relevant MTS IIA Objective	Proposed Changes IIA Scoped In/Out	Justification
Historic Environment	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	Out	Assume no changes to physical environment which will impact on setting of historic assets.
Materials and Waste	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	Out	No impact on vehicle disposal rates.
Natural Capital and Natural Environment	To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity	Out	Only potential impact could be associated with reduction in pollutant deposition on protected habitats due to reduction in traffic flow in the CCZ. Likely to be marginal.
Noise	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	In (included under equality and health)	Noise is detrimental to human health
People			
Health (and health inequalities)	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities	In	<p>Assessment includes consideration of health effects as a result in changes to air quality, noise, accessibility and social integration, connectivity, safety and crime, employment, as well as health inequalities.</p> <p>Climate change in relation to health scoped out – any change to GHG emissions and indirect health benefits from the proposal will likely be imperceptible.</p>

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IIA Theme/Topic	Relevant MTS IIA Objective	Proposed Changes IIA Scoped In/Out	Justification
			Employment effects in relation to health scoped in due to the potential for permanent changes to have an increased financial burden on drivers/employees, resulting in stress.
Accessibility and social integration	To maximise accessibility for all in and around London	In (under equality and health)	<p>Changes to the Congestion Charge may impact on transport accessibility as well as access to healthcare and social infrastructure.</p> <p>Sub-heading amended to include 'social integration' in relation to removal of severance, potentially encouraging people to spend more time outdoors and integrate socially (potential link with Mayors Streetspace for London Plan).</p>
Protected Characteristics and Deprivation (Equality and Inclusion)	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.	In	<p>Changes to the Congestion Charge may have a differential impact on those with protected characteristics and those in deprivation</p> <p>As set out in the 2020 IIA, travel trends differ between protected characteristic groups in addition to variations in levels of deprivation. As such implementation of permanent CCZ measures will impact protected characteristic groups and those in deprivation differentially.</p>
Social Integration	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	In	Proposed Changes may result in a beneficial effect on social integration due to removal of severance, potentially encouraging people to spend more time outdoors.
Design	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness, reducing the need to travel by motorized transport	In	Scheme could have a positive indirect impact on public realm and provide new opportunities for placemaking.
Safety and Crime	To contribute to safety and security and generate the perceptions of safety	In (under equality and health)	Proposed Changes to the Congestion Charge might impact on perception of safety / fear of crime when travelling for some people who may not be able to afford to pay the charge and need to switch to public transport or active modes.

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IIA Theme/Topic	Relevant MTS IIA Objective	Proposed Changes IIA Scoped In/Out	Justification
Economy			
Employment		In	Changes to the Congestion Charge may impact on cost of accessing employment in London and impact on labour supply.
Businesses		In	Changes to the Congestion Charge may impact on business costs and operations
London's wider economy	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economy providing opportunities for all	In	Changes to the Congestion Charge may impact London's economy depending on scale of impacts on sectors present in the CCZ.
Connectivity	To enhance and improve connectivity for all to and from and within and around London and increase the proportion of journeys made by sustainable and active transport modes	In (under equality and health)	Increasing the proportion of journeys in central London by sustainable and active travel modes is an objective of the CCZ. The changes could encourage more uptake of these modes due to improved amenity and may impact on health from increased physical activity associated with active travel.
Infrastructure	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	Out	Scheme does not provide new infrastructure.
Sustainable Land Use	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	Out	Scheme could enable reallocation of road-space but this is not a direct impact. Unlikely to have any impact on overall patterns of development, based on evidence of CCZ to date.
Housing Supply, Quality, Choice and Affordability	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to	Out	Scheme will have no impact on housing provision.

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IIA Theme/Topic	Relevant MTS IIA Objective	Proposed Changes IIA Scoped In/Out	Justification
	better meet demographic change and household demand		
Culture	To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	Out	Scheme has no impact on heritage or cultural assets.

Appendix D: Coding frame and frequency counts

These tables show the number of respondents who indicated the comment or issue in the open questions and the per cent of the total number of people who responded to the open questions (shown in % columns in each table). The per cent value is greater than 100 per cent as people could raise more than one issue or comet within the open questions. The following tables are for comments and issues raised about the proposals. Please see the final table for comments made regarding the consultation itself.

Coding ref	Charge Level	Public or Stakeholder		Respondent Type																			
		Total		A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
1	Support/agree with the proposed charge level (£15)	184	2	27	2	9	2	16	4	35	2	44	2	54	2	9	2	1	4	6	2	20	2
2	Charge should be higher (general comments)	194	3	44	3	6	1	20	5	68	5	61	3	100	4	9	2	2	9	0	0	17	2
3	Charge should be higher for weekdays (Monday - Friday)	15	0	0	0	0	0	0	0	6	0	5	0	4	0	0	0	1	4	1	0	1	0
4	Charge should be higher for weekends (Saturday and Sunday)	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
5	Charge should be higher on Sundays only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Charge should be higher during peak/rush hours	2	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0
7	Charge should be higher for other specified periods	4	0	0	0	0	0	0	0	2	0	2	0	2	0	0	0	0	0	0	0	1	0
20	Charge should return to pre-pandemic levels (£11.50)	554	7	67	4	35	8	14	4	99	7	143	6	164	7	36	7	0	0	31	11	58	6
21	Charge should be lower/oppose the proposed charge level (£15) (general comments)	617	8	78	5	38	8	18	5	108	7	187	8	212	9	51	9	0	0	28	10	80	8
22	Charge should be lower for weekdays (Monday - Friday)	6	0	0	0	0	0	0	0	2	0	1	0	2	0	0	0	0	0	1	0	0	0
23	Charge should be lower for weekends (Saturday and Sunday)	29	0	3	0	3	1	1	0	7	0	13	1	12	0	4	1	0	0	1	0	2	0
24	Charge should be lower on Sundays only	5	0	0	0	0	0	0	0	0	0	3	0	1	0	0	0	0	0	0	0	3	0
25	Charge should be lower during peak/rush hours	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	Charge should be lower for other specified periods	16	0	7	0	0	0	1	0	3	0	6	0	3	0	2	0	0	0	1	0	2	0

Coding ref	Charges - Vehicle Types	Public or Stakeholder		Respondent Type																			
		Total		A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
40	Support taxis (black cabs) not being charged/being exempt from charges	20	0	4	0	1	0	1	0	3	0	2	0	3	0	1	0	1	4	7	3	1	0
41	Oppose taxis (black cabs) not being charged/should not be exempt from charges	37	0	4	0	1	0	3	1	13	1	13	1	16	1	2	0	1	4	7	3	4	0
42	Support PHVs being charged/should not be exempt from charges	19	0	3	0	2	0	1	0	3	0	6	0	6	0	0	0	1	4	3	1	3	0
43	Oppose PHVs being charged/should be exempt from charges	84	1	2	0	2	0	0	0	9	1	12	1	10	0	1	0	1	4	55	20	2	0
44	PHVs should be charged more/higher amount	8	0	3	0	1	0	1	0	2	0	0	0	3	0	0	0	0	0	0	0	1	0
45	PHVs should be charged less/lower amount	16	0	1	0	0	0	0	0	1	0	1	0	3	0	0	0	0	0	9	3	0	0
46	Taxis/PHVs (cannot determine which) should not be charged/should be exempt from charges	22	0	4	0	3	1	1	0	3	0	4	0	10	0	1	0	2	9	7	3	3	0
47	Taxis/PHVs (cannot determine which) should be charged/should not be exempt from charges	22	0	4	0	2	0	0	0	6	0	5	0	7	0	2	0	0	0	0	0	6	1
48	Taxis/PHVs (cannot determine which) should be charged more/higher amount	9	0	1	0	1	0	1	0	4	0	1	0	5	0	1	0	0	0	0	0	2	0
49	Taxis/PHVs (cannot determine which) should be charged less/lower amount	7	0	2	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	2	1	0	0
50	Delivery/freight/servicing vehicles should not be charged/should be exempt from charges	41	1	9	1	4	1	4	1	5	0	7	0	13	1	3	1	0	0	3	1	6	1
51	Delivery/freight/servicing vehicles should be charged more/higher amount	37	0	7	0	2	0	0	0	9	1	12	1	12	0	5	1	1	4	0	0	4	0
52	Delivery/freight/servicing vehicles should be charged less/lower amount	13	0	3	0	1	0	1	0	0	0	3	0	3	0	0	0	0	0	0	0	5	1
53	Support/agree with battery electric vehicles/hydrogen fuel cell vehicles not being charged/being exempt from charges	101	1	21	1	9	2	9	2	20	1	32	1	36	1	6	1	0	0	1	0	10	1
54	Oppose/disagree with battery electric vehicles/hydrogen fuel cell vehicles not being charged/being exempt from charges	20	0	2	0	2	0	1	0	4	0	10	0	8	0	0	0	0	0	1	0	6	1
55	Should be no charge/exemptions for other specified vehicle types	74	1	14	1	9	2	3	1	13	1	16	1	15	1	9	2	1	4	6	2	12	1
56	Charges should be higher for other specified vehicle types	115	1	22	1	8	2	8	2	24	2	36	2	39	2	10	2	0	0	4	1	16	2
57	Charges should be lower for other specified vehicle types	60	1	10	1	5	1	2	1	16	1	19	1	21	1	3	1	0	0	2	1	6	1

Coding ref	Auto Pay and Pay Next Day	Public or Stakeholder		Respondent Type																			
				A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
		Total		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
70	Should be a discount for Autopay / Fleet auto pay users	205	3	38	3	11	2	14	4	53	4	64	3	68	3	12	2	0	0	9	3	32	3
71	Support having no Autopay discount	40	1	5	0	0	0	3	1	9	1	8	0	10	0	1	0	0	0	0	0	3	0
80	Should reduce time to pay (e.g. within 24 hours)	8	0	3	0	1	0	2	1	1	0	2	0	2	0	0	0	0	0	0	0	0	0
81	Should extend time to pay (e.g. greater than 3 days)	42	1	4	0	1	0	0	0	6	0	8	0	10	0	6	1	0	0	1	0	7	1
82	Should be no extra charge for not paying on the same day	94	1	17	1	5	1	4	1	18	1	31	1	34	1	12	2	0	0	2	1	6	1
83	Support increase in charge when paying up to three days later (£17.50)	43	1	5	0	2	0	3	1	5	0	11	0	10	0	8	1	0	0	0	0	1	0
84	Support extending the time to pay to three days	35	0	1	0	2	0	0	0	8	1	13	1	15	1	1	0	0	0	1	0	2	0
85	Suggest increasing the charge for not paying on the same day (e.g. £20)	11	0	3	0	1	0	2	1	1	0	5	0	4	0	2	0	0	0	1	0	2	0

Coding ref	Zoning and Charging Period		Public or Stakeholder	Respondent Type																				
			Total		A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
					Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
100	Should extend the Congestion Charge zone/increase the boundary	121	2	11	1	4	1	5	1	46	3	43	2	63	3	12	2	1	4	3	1	15	2	
101	The Congestion Charge zone should align the zone for the ULEZ expansion (planned for Oct 2021)	6	0	1	0	0	0	1	0	3	0	2	0	1	0	0	0	0	0	0	0	1	0	
102	Should reduce the size/boundary of the Congestion Charge zone	30	0	4	0	5	1	1	0	7	0	7	0	11	0	4	1	0	0	0	0	6	1	
103	Proposed changes should be implemented sooner	82	1	25	2	5	1	13	3	10	1	20	1	17	1	5	1	0	0	4	1	8	1	
104	Proposed changes should be delayed	23	0	3	0	1	0	0	0	2	0	6	0	11	0	1	0	0	0	0	0	4	0	
105	Should have a way to check if you've been inside the zone/when you need to pay	70	1	4	0	2	0	3	1	20	1	22	1	31	1	7	1	0	0	1	0	12	1	
120	Do not support new charging period/hours (general comment)	128	2	19	1	6	1	6	2	25	2	46	2	41	2	9	2	0	0	1	0	10	1	
121	Support the new charging period/hours (general comment)	173	2	34	2	7	2	13	3	26	2	38	2	41	2	9	2	1	4	1	0	23	2	
123	Support changes to include charge on Bank Holidays	17	0	3	0	0	0	2	1	3	0	9	0	7	0	3	1	0	0	0	0	2	0	
124	Support Christmas Day to New Year Day (inclusive) charge-free period	131	2	4	0	3	1	0	0	12	1	14	1	19	1	6	1	0	0	2	1	4	0	
125	Oppose changes to include charge on Bank Holidays	501	6	85	6	33	7	15	4	93	6	151	7	152	6	39	7	0	0	19	7	57	6	
126	Oppose Christmas Day to New Year Day (inclusive) charge-free period	15	0	4	0	0	0	2	1	3	0	3	0	4	0	0	0	0	0	0	0	0	0	
127	Should be no charge for weekdays (Monday - Friday)	10	0	7	0	0	0	3	1	1	0	3	0	1	0	0	0	0	0	0	0	0	0	
128	Should be no charge for weekends (Saturday and Sunday)	2474	32	314	21	136	30	67	17	462	32	806	36	772	31	176	32	1	4	95	34	329	33	
129	Should be no charge for Sundays	408	5	52	3	13	3	11	3	62	4	131	6	111	4	29	5	0	0	3	1	79	8	
130	Should be no charge for other specified periods	26	0	7	0	3	1	1	0	3	0	7	0	6	0	1	0	0	0	0	0	1	0	
131	Charging period/hours should replicate those used through the temporary changes	344	4	66	4	14	3	20	5	124	8	137	6	195	8	29	5	1	4	1	0	33	3	
132	Charging period/hours for Mon-Fri should replicate those used through the temporary changes	79	1	17	1	4	1	8	2	27	2	32	1	43	2	7	1	1	4	1	0	7	1	
133	Charging period/hours for Mon-Fri should return to pre-pandemic (ie 0700-1800)	1425	18	204	14	93	20	45	12	272	19	445	20	450	18	116	21	1	4	74	27	177	18	
134	Charging period/hours for Sat-Sun should replicate those used through the temporary changes	26	0	7	0	0	0	1	0	4	0	10	0	9	0	0	0	0	0	1	0	8	1	
135	Charging period should apply 24/7/all the time	99	1	24	2	2	0	9	2	33	2	38	2	55	2	6	1	0	0	1	0	10	1	
136	Charging period/hours should be extended (general comments)	97	1	18	1	3	1	10	3	40	3	33	1	52	2	7	1	0	0	0	0	6	1	
137	Charging period/hours should be reduced (general comments)	220	3	44	3	12	3	12	3	37	3	60	3	70	3	15	3	0	0	6	2	19	2	
138	Charging period/hours should be extended during weekends to be the same as weekdays	20	0	3	0	0	0	2	1	5	0	9	0	9	0	0	0	0	0	0	0	5	1	
139	Other specific time changes suggested (that do not fit into above)	376	5	57	4	16	4	16	4	78	5	129	6	129	5	27	5	3	13	7	3	52	5	

Coding ref	Public or Stakeholder		Respondent Type																			
			A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
	Total		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
140 Support/agree with the residents' discount	835	11	513	34	51	11	149	38	44	3	61	3	88	3	19	3	0	0	9	3	54	5
141 Should not be a residents' discount	177	2	22	1	13	3	10	3	65	4	59	3	101	4	14	2	1	4	0	0	14	1
142 Residents' discount should be higher	102	1	54	4	6	1	12	3	10	1	18	1	16	1	5	1	0	0	1	0	6	1
143 Residents' discount should be lower	86	1	17	1	2	0	2	1	27	2	33	1	40	2	7	1	0	0	2	1	11	1
144 Boundary should be extended for residents' discount/unfair to those located just outside	73	1	9	1	7	2	0	0	23	2	13	1	22	1	3	1	0	0	2	1	25	3
145 Other specific changes suggested to residents' discount	149	2	63	4	7	2	16	4	22	2	31	1	34	1	10	2	0	0	2	1	19	2
146 Oppose the removal of online and app resident pre-payment	4	0	2	0	1	0	2	1	2	0	2	0	1	0	1	0	0	0	0	0	1	0
160 Should be no reimbursement for NHS staff	49	1	8	1	5	1	3	1	15	1	14	1	19	1	4	1	0	0	2	1	8	1
161 Should be no reimbursement for NHS patients	12	0	1	0	1	0	0	0	5	0	3	0	4	0	2	0	0	0	0	0	1	0
162 NHS staff reimbursement should apply in general	115	1	16	1	4	1	4	1	25	2	21	1	39	2	8	1	0	0	4	1	13	1
163 NHS patient reimbursement should apply in general	69	1	8	1	1	0	1	0	9	1	12	1	19	1	6	1	0	0	0	0	8	1
164 NHS staff/patients should be incentivised to use active travel modes or public transport	19	0	4	0	1	0	2	1	11	1	7	0	12	0	1	0	0	0	0	0	3	0
180 Should be no discounts for anyone	23	0	5	0	3	1	2	1	8	1	6	0	10	0	1	0	0	0	0	0	4	0
181 Support there being a discount for blue badge holders	81	1	4	0	0	0	2	1	7	0	11	0	13	1	1	0	0	0	0	0	4	0
182 Should be a discount for other disabled people (i.e. in addition to blue badge holders)	61	1	11	1	3	1	2	1	13	1	21	1	22	1	4	1	1	4	3	1	16	2
183 Should be a discount for elderly people	31	0	3	0	2	0	0	0	2	0	8	0	6	0	3	1	0	0	2	1	8	1
184 Should be a discount for vulnerable people (not specified whether referring to disabled or elderly people)	9	0	3	0	0	0	2	1	0	0	2	0	2	0	0	0	0	0	0	0	2	0
185 Should be a discount for those with informal family care arrangements	111	1	37	2	4	1	10	3	8	1	25	1	14	1	3	1	0	0	1	0	15	2
186 Should be a discount for vehicle sharing i.e. car / van sharing clubs	9	0	2	0	0	0	0	0	1	0	2	0	3	0	2	0	0	0	0	0	2	0
187 Should be a discount for emergency services workers (e.g. police)	44	1	5	0	2	0	3	1	16	1	9	0	20	1	3	1	1	4	1	0	10	1
188 Should be a discount for key workers	67	1	20	1	2	0	7	2	21	1	16	1	31	1	4	1	0	0	4	1	10	1
189 Should be a discount for my business	3	0	0	0	1	0	0	0	0	0	2	0	2	0	0	0	0	0	0	0	1	0
190 Should be a discount for smaller businesses	16	0	3	0	2	0	2	1	2	0	2	0	3	0	0	0	1	4	0	0	4	0
191 Should be a discount for businesses (general comments)	15	0	2	0	6	1	0	0	3	0	4	0	5	0	1	0	0	0	2	1	1	0
192 Should be a discount for those on lower incomes/financially struggling	111	1	18	1	5	1	2	1	22	2	25	1	31	1	8	1	0	0	4	1	19	2
193 Should be a discount for other specified users/groups	154	2	31	2	7	2	10	3	30	2	33	1	51	2	16	3	0	0	7	3	27	3

Coding ref	Wider Impacts	Public or Stakeholder		Respondent Type																			
		Total		A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
210	Proposed changes will have no impact to congestion	465	6	72	5	37	8	18	5	100	7	145	7	191	8	33	6	2	9	18	6	69	7
211	Proposed changes will have a positive impact on congestion/will reduce it	43	1	14	1	1	0	4	1	8	1	11	0	13	1	3	1	0	0	0	0	5	1
212	Proposed changes will cause more congestion/increase it	467	6	81	5	29	6	27	7	135	9	160	7	214	9	36	7	4	17	11	4	64	7
213	Proposed changes will have no impact to air quality	153	2	26	2	11	2	10	3	33	2	41	2	67	3	13	2	0	0	5	2	14	1
214	Proposed changes will have a positive impact on air quality/will improve it	16	0	3	0	1	0	0	0	6	0	4	0	7	0	0	0	0	0	0	0	2	0
215	Proposed changes will make air quality/pollution worse	247	3	36	2	14	3	12	3	68	5	85	4	109	4	17	3	2	9	8	3	35	4
216	Proposed changes will have no impact to noise pollution	3	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
217	Proposed changed will have a positive impact on noise pollution/reduce it	2	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
218	Proposed changes will make noise pollution worse/create more noise	16	0	8	1	1	0	1	0	2	0	7	0	4	0	2	0	0	0	0	0	5	1
219	Proposed changes will have no impact to safety	20	0	3	0	1	0	0	0	5	0	7	0	8	0	0	0	0	0	0	0	1	0
220	Proposed changed will have a positive impact on safety issues/improve safety	6	0	0	0	0	0	0	0	2	0	4	0	3	0	1	0	0	0	1	0	0	0
221	Proposed changes will make make safety issues worse	125	2	21	1	3	1	11	3	34	2	53	2	66	3	14	3	0	0	3	1	21	2
223	Will push people out of London/cause people to move away/relocate	8	0	2	0	0	0	0	0	1	0	3	0	3	0	1	0	0	0	0	0	1	0
222	Congestion Charge pushes congestion and pollution outside of the zone	18	0	3	0	3	1	2	1	4	0	6	0	5	0	0	0	0	0	1	0	6	1

Coding ref	Impact on society, active travel and public transport	Public or Stakeholder		Respondent Type																			
		Total		A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
230	Proposed changes will negatively impact active travel (walking, cycling)	108	1	11	1	1	0	4	1	39	3	50	2	65	3	11	2	0	0	0	0	12	1
231	Proposed changes will positively impact active travel (walking, cycling)	6	0	2	0	0	0	0	0	2	0	3	0	2	0	0	0	0	0	0	0	0	0
232	Proposed changes will negatively impact public transport	49	1	9	1	1	0	4	1	9	1	23	1	25	1	3	1	0	0	0	0	8	1
233	Proposed changes will positively impact public transport	3	0	2	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0
240	Will have detrimental impact on theatres/restaurants/nightlife (e.g. West End)	471	6	45	3	21	5	9	2	63	4	192	9	143	6	45	8	1	4	8	3	77	8
241	Will have a detrimental impact on my business/livelihood	198	3	33	2	37	8	8	2	37	3	51	2	50	2	11	2	1	4	22	8	31	3
242	Will have a detrimental impact on small businesses	146	2	23	2	24	5	4	1	22	2	33	1	44	2	7	1	0	0	9	3	15	2
243	Will have detrimental impact on businesses (general comments)	739	10	88	6	72	16	17	4	126	9	274	12	230	9	71	13	1	4	20	7	98	10
244	Will have detrimental impact on London's economy	517	7	61	4	47	10	13	3	98	7	190	9	170	7	43	8	0	0	9	3	83	8
245	Will have detrimental impact on those struggling financial/on lower incomes (e.g. debt)	650	8	125	8	38	8	30	8	121	8	165	7	194	8	32	6	0	0	21	8	91	9
246	Congestion Charge costs will be/are being passed onto residents/customers from businesses/services	21	0	6	0	2	0	1	0	2	0	3	0	0	0	1	0	0	0	0	0	6	1
260	Proposed changes will have a positive impact on those with protected characteristics	11	0	4	0	0	0	3	1	1	0	2	0	1	0	2	0	0	0	0	0	1	0
261	Proposed changes will have a negative impact on those with protected characteristics	135	2	23	2	7	2	6	2	16	1	46	2	35	1	8	1	0	0	4	1	18	2
262	Will encourage people to drive at different times (e.g. evenings and weekends for shopping and leisure)	45	1	15	1	2	0	6	2	8	1	14	1	18	1	3	1	0	0	0	0	4	0
263	Will negatively impact on social/leisure activities	603	8	114	8	21	5	18	5	74	5	200	9	150	6	36	7	0	0	11	4	82	8
264	Will negatively impact on faith groups (e.g. travelling to church)	445	6	47	3	6	1	10	3	43	3	121	5	90	4	21	4	0	0	2	1	93	9
265	Will negatively impact disabled people	195	3	43	3	8	2	9	2	27	2	52	2	48	2	11	2	0	0	3	1	46	5
266	Will negatively impact elderly people	366	5	79	5	13	3	15	4	25	2	95	4	65	3	21	4	0	0	9	3	58	6
267	Will negatively impact vulnerable people (not specified whether referring to disabled or elderly people)	184	2	32	2	8	2	9	2	24	2	43	2	42	2	15	3	0	0	3	1	32	3

Coding ref	Alternative mitigating suggestions and General Comments	Public or Stakeholder		Respondent Type																			
				A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
280	Needs to be more enforcement of poor cyclist behaviour	132	2	34	2	6	1	4	1	26	2	25	1	33	1	6	1	1	4	3	1	26	3
281	Needs to be more encouragement/investment in public transport (e.g. cheaper, more frequent etc)	496	6	63	4	24	5	12	3	114	8	159	7	210	8	46	8	2	9	5	2	68	7
282	Needs to be more encouragement/investment in active travel (walking, cycling, infrastructure, pedestrianisation)	244	3	47	3	11	2	16	4	58	4	83	4	96	4	25	5	1	4	5	2	29	3
283	Other suggestions to reduce congestion/pollution	393	5	95	6	34	7	23	6	82	6	96	4	142	6	21	4	1	4	7	3	58	6
284	Need more parking areas/spaces	57	1	10	1	6	1	1	0	6	0	13	1	17	1	4	1	0	0	2	1	11	1
285	Need less parking areas/spaces	15	0	3	0	1	0	0	0	1	0	6	0	5	0	0	0	0	0	0	0	2	0
286	Make parking cheaper	39	1	4	0	6	1	0	0	7	0	9	0	18	1	2	0	0	0	0	0	3	0
287	Make parking more expensive	13	0	3	0	1	0	1	0	1	0	3	0	2	0	0	0	0	0	0	0	4	0
288	Request for TfL to explore wider road charging schemes	89	1	20	1	2	0	9	2	22	2	27	1	32	1	6	1	0	0	0	0	9	1
289	Should stop/limit commercial vehicles entering during the day	9	0	3	0	0	0	2	1	0	0	1	0	1	0	1	0	0	0	1	0	1	0
300	Support/agree with the proposed changes (general comment)	194	3	34	2	4	1	7	2	29	2	40	2	47	2	11	2	0	0	6	2	11	1
301	Oppose/disagree with the proposed changes (general comment)	295	4	44	3	17	4	11	3	68	5	80	4	98	4	13	2	1	4	13	5	43	4
302	Support/agree with the Congestion Charge scheme (general comment)	58	1	17	1	2	0	6	2	10	1	11	0	14	1	4	1	0	0	2	1	8	1
303	Oppose/disagree with the Congestion Charge scheme (general comment)	299	4	46	3	35	8	8	2	54	4	82	4	90	4	21	4	1	4	11	4	43	4
304	Unfair to penalise drivers (general comments)	379	5	68	5	29	6	16	4	68	5	82	4	114	5	27	5	1	4	15	5	66	7
305	Oppose proposed changes because of Covid-19 (e.g. feel safer driving, already financially struggling)	361	5	57	4	16	4	13	3	57	4	105	5	123	5	26	5	0	0	10	4	51	5
306	Support proposed changes because of Covid-19	10	0	3	0	0	0	1	0	3	0	3	0	4	0	2	0	0	0	0	0	0	0
307	Other traffic measures cause congestion not volume of traffic	569	7	125	8	59	13	33	9	115	8	116	5	181	7	36	7	4	17	25	9	95	10
308	Public transport isn't a viable option for journey	278	4	48	3	7	2	15	4	55	4	66	3	98	4	15	3	0	0	2	1	54	5
309	Proposals will not meet TfL's aims	223	3	42	3	9	2	16	4	55	4	73	3	97	4	21	4	2	9	3	1	37	4
310	Walking/cycling/active travel not a viable option for some	9	0	2	0	0	0	0	0	0	0	1	0	3	0	0	0	0	0	0	0	1	0

Coding ref	Others	Public or Stakeholder		Respondent Type																			
		Total		A resident in the Congestion Charge zone		A local business owner		Employed locally and a resident		Employed locally and not a resident		A visitor to the area		A commuter to the area		Not local but interested in the scheme		A taxi (black cab) driver		A private hire vehicle driver		Other	
				Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
320	Congestion Charge is just another tax/money-making scheme	1070	14	181	12	93	20	41	10	205	14	295	13	342	14	72	13	3	13	51	18	177	18
321	Criticism of the Mayor	611	8	98	6	51	11	25	6	126	8	134	6	182	7	18	3	3	13	29	10	88	9
322	Criticism of the Government	99	1	21	1	5	1	3	1	22	1	24	1	25	1	6	1	0	0	4	1	17	2
323	Criticism of TfL	805	10	145	9	74	16	34	9	151	10	211	9	276	11	50	9	5	21	37	13	129	13
324	Comment about existing ULEZ	186	2	35	2	14	3	5	1	33	2	42	2	55	2	13	2	0	0	3	1	30	3
325	Comment about ULEZ October expansion	90	1	14	1	4	1	6	2	13	1	18	1	23	1	8	1	0	0	0	0	17	2
326	Comment about Penalty Charge Notice consultation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
327	Criticism of consultation/ consultation material	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
328	Comments about Low Traffic Neighbourhoods (LTNs)	19	0	4	0	1	0	1	0	2	0	4	0	8	0	0	0	0	0	2	1	5	1
329	References/comparisons made to other cities/countries	9	0	1	0	1	0	1	0	0	0	3	0	3	0	0	0	0	0	0	0	1	0
400	Other (does not fit into codeframe)	163	2	48	3	17	4	12	3	26	2	41	2	43	2	17	3	0	0	5	2	17	2

The following table shows comments and issues raised about the consultation process.

Coding ref	Consultation	Public or Stakeholder						Respondent Type																			
		Stakeholder		Public		Total		A resident in		A local		Employed		Employed		A visitor to the		A commuter to		Not local but		A taxi (black		A private hire		Other	
		Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
500	issues with questions / information - complicated or unclear	2	15	734	31	736	31	187	35	49	27	52	38	187	34	266	34	293	32	56	28	2	33	13	27	112	26
501	issues with questions - not possible to answer questions	0	0	54	2	54	2	16	3	6	3	5	4	9	2	16	2	19	2	9	5	0	0	1	2	10	2
502	Issues with the questions - irrelevant	0	0	115	5	115	5	24	5	7	4	11	8	27	5	39	5	36	4	12	6	0	0	0	0	22	5
503	Issues with the questions - leading	3	23	737	31	740	31	146	27	73	40	39	29	169	31	238	30	299	33	62	31	2	33	7	15	145	33
504	Issues with questions - No way to indicate support or opposition	0	0	350	15	350	15	67	13	29	16	24	18	84	15	133	17	145	16	26	13	0	0	3	6	61	14
505	Issues with questions - range of responses were limited	0	0	169	7	169	7	40	8	10	5	12	9	46	8	67	9	68	7	16	8	0	0	5	10	28	6
506	Issues with questions - Can't express which proposals would work best (e.g. don't ask opinions on certain aspects)	1	8	276	12	277	12	65	12	24	13	14	10	71	13	104	13	104	11	15	8	0	0	3	6	54	12
511	Inadequate space to provide detailed comments	0	0	54	2	54	2	12	2	6	3	3	2	12	2	19	2	19	2	5	3	0	0	2	4	7	2
512	No questions relating to the financial aspects of the proposals	1	8	38	2	39	2	8	2	4	2	1	1	10	2	12	2	15	2	2	1	0	0	3	6	11	3
513	Poor quality / design / presentation	2	15	382	16	384	16	94	18	31	17	17	13	88	16	121	15	136	15	30	15	0	0	8	17	72	17
514	Lack of data or evidence to support the proposals	5	38	100	4	105	4	21	4	5	3	6	4	23	4	31	4	36	4	12	6	0	0	1	2	23	5
515	No map of congestion zone	0	0	27	1	27	1	8	2	1	1	3	2	7	1	6	1	8	1	1	1	0	0	0	0	7	2
520	Consultation material not advertised or publicised enough	1	8	231	10	232	10	56	11	12	7	15	11	44	8	65	8	98	11	18	9	0	0	4	8	52	12
521	Consultation was difficult to access	0	0	123	5	123	5	28	5	10	5	6	4	25	5	37	5	47	5	6	3	1	17	1	2	25	6
522	Issues with registration to access consultation	0	0	35	1	35	1	9	2	2	1	2	1	9	2	10	1	9	1	3	2	0	0	0	0	8	2
523	Oppose the need to register to access the consultation	0	0	76	3	76	3	25	5	4	2	6	4	17	3	18	2	19	2	5	3	0	0	1	2	12	3
530	No issues /general positive comment	0	0	52	2	52	2	13	2	2	1	1	1	8	1	17	2	17	2	2	1	0	0	3	6	11	3
531	Other comment about the consultation / consultation material	0	0	85	4	85	4	20	4	6	3	3	2	18	3	28	4	23	3	5	3	1	17	6	13	19	4
532	Hope comments/feedback will be useful/listened to/considered/addressed	0	0	12	1	12	0	3	1	1	1	1	1	0	0	2	0	1	0	3	2	1	17	0	0	1	0
533	Concerns about whether consultation will fairly represent London's residents/should be further consultation	0	0	5	0	5	0	2	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	2	4	0	0

Appendix E: AECOM Congestion Charge consultation analysis report

Congestion Charge Consultation Analysis

Transport for London

November 2021

Quality information

Prepared by	Checked by	Verified by	Approved by
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1. Introduction

1.1 Background: Overview of the consultation

In 2020, Transport for London (TfL) made temporary changes to the charge in response to the transport challenges presented by the Covid-19 pandemic, including operating daily until 22:00. TfL consulted on new proposals which would help reduce traffic and congestion and improve air quality. The table below summarises the proposals:

Figure 1.1 Summary of charges

	Pre-pandemic scheme (up to 22 June 2020)	Temporary changes (from 22 June 2020)	Proposed changes
Charge level	£11.50	£15	£15
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	Mon – Friday 07:00 – 18:00	Mon – Sun 07:00 – 22:00	Mon – Fri 07:00 – 18:00 Sat, Sun & Bank holiday 12:00 – 18:00
Non-charging days	Bank holidays Days between Christmas and New Year's Day	Christmas Day	Christmas Days to New Year's Day Bank Holiday (inclusive)
Residents' discounts	90 per cent for all residents following registration for discount	90 per cent discount for new residents closed (from 1 August 2020)	90 per cent for all residents following registration for discount
Reimbursements	NHS staff and patient reimbursement arrangements	NHS staff and patient reimbursement schemes extended New reimbursement arrangements for care home workers working at care homes in the Congestion Charge zone, charity workers and local authority workers providing certain services	Extended NHS staff reimbursement arrangement NHS patient reimbursement arrangements expanded to patients vulnerable to risk of infection during future 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 Congestion Charge zone, charity workers, local authority workers / volunteers providing certain services during the COVID-19 pandemic, expanded to any future pandemic or epidemic prevalent in Greater London

1.2 The consultation

TfL held a consultation between 28th July 2021 and 6th October 2021 about proposed changes to the Congestion Charge. The findings from the consultation will be used to inform a decision by the Mayor of London on the proposed changes.

AECOM were appointed to carry out the following tasks:

- Thematic coding and analysis of open-ended questions;
- Quantitative analysis of the closed questions and demographic questions;
- Cleaning and analysis of postcode data provided; and
- Mapping of respondent location

1.3 The questionnaire

TfL designed and hosted the questionnaire on the TfL consultation portal. A copy of the questionnaire can be found in Appendix B, questions included:

- Importance of taking steps to reduce traffic and congestion in central London;
- Importance of taking steps to increase the use of sustainable transport;
- Perceived effectiveness of the different aspects of the proposals in supporting TfL's delivery of the Mayor's Transport Strategy;
- Importance of reimbursement arrangements for some people;
- Comments about the proposal and mitigation;
- Respondent information demographics and use of the Congestion Charge zone; and
- Feedback on the consultation material

1.3.1 Format of report

Following this introduction:

- Chapter 2: describes the methodology used;
- Chapter 3: details the key findings to the consultation; and
- Chapter 4: provides feedback on the consultation process and material

2. Methodology

2.1 Receiving responses

Most responses were received via the consultation questionnaire hosted on the TfL portal. To ensure inclusivity, TfL also gathered responses via email and hardcopy questionnaire. An “easy read” version of the questionnaire was also available.

TfL entered all responses received by methods other than the online questionnaire into the TfL portal. The database was delivered to AECOM in weekly batches for processing, analysis, and reporting.

2.2 Campaigns

When analysing the responses, it is apparent there has been a small campaign amongst churchgoers. A total of 53 emails were received that were very similar in response.

2.3 Thematic coding

All free-text responses and letters and emails were grouped into themes to allow meaningful analysis. Letter and email responses were combined with the free text comments given in the questionnaire for analysis purposes.

Where possible, free text responses have been analysed by topic rather than response to a question to allow meaningful analysis and avoid double counting where respondents have given the same response to several questions.

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

Throughout the report, quotes from the free text responses and letters and emails have been used to illustrate the points raised. Quotes have been selected to best show the essence of what was said for each theme. For ease of reading, any clear and obvious typos or spelling errors have been corrected.

2.4 Analysis and reporting

The consultation was open to all and, therefore, respondents were self-selecting. This, coupled with the fact respondents could choose which of the questions they answered, means the results and responses should be viewed as indicative of the wider population and any identified sub-groups rather than representative. The profile of respondents is detailed in the next section.

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

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

The percentages shown for the free text comments are taken from the number of people who provided a comment.

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

A large volume of data was received and therefore the following chapters summarise the main findings and highlight pertinent differences between groups. A set of tables is available in **Appendix A**.

2.5 Response

2.5.1 Type of respondent

A total of 9680 responses were received, of which 92 were stakeholders.

Respondents represented the following (NB respondents can be represented in more than one group):

Table 2.1 Respondent types

Respondent type	Count
A resident in the Congestion Charge zone	1925
A local business owner	538
A visitor to the area	2830
A commuter to the area	3173
Not local but interested in the scheme	767
A taxi (black cab) driver	31
A private hire vehicle driver	389
Employed locally	2312
Other	1119

For analysis purposes, we have split those employed locally into two categories:

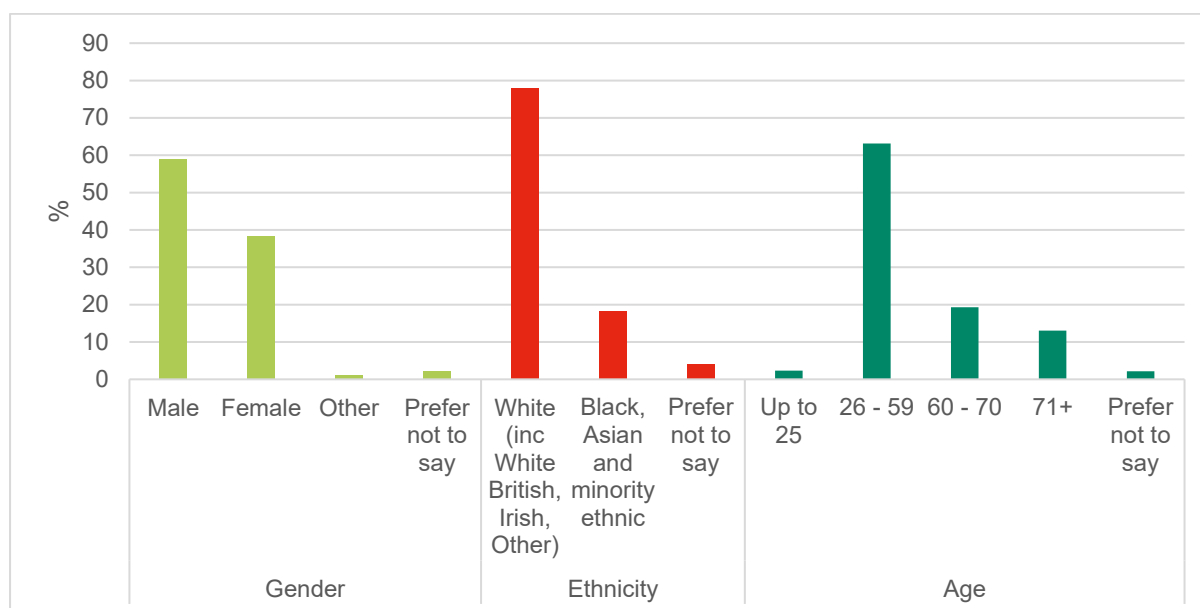
- Employed locally and a resident (482)
- Employed locally and not a resident (1830)

Not everyone (1189 respondents) provided this information.

Of the 9680 total responses received, 6732 provided a comment to at least one of the open questions in the survey. For the issues commonly raised throughout the report, the percentages are of respondents who provided a comment to either of the open questions on the proposals.

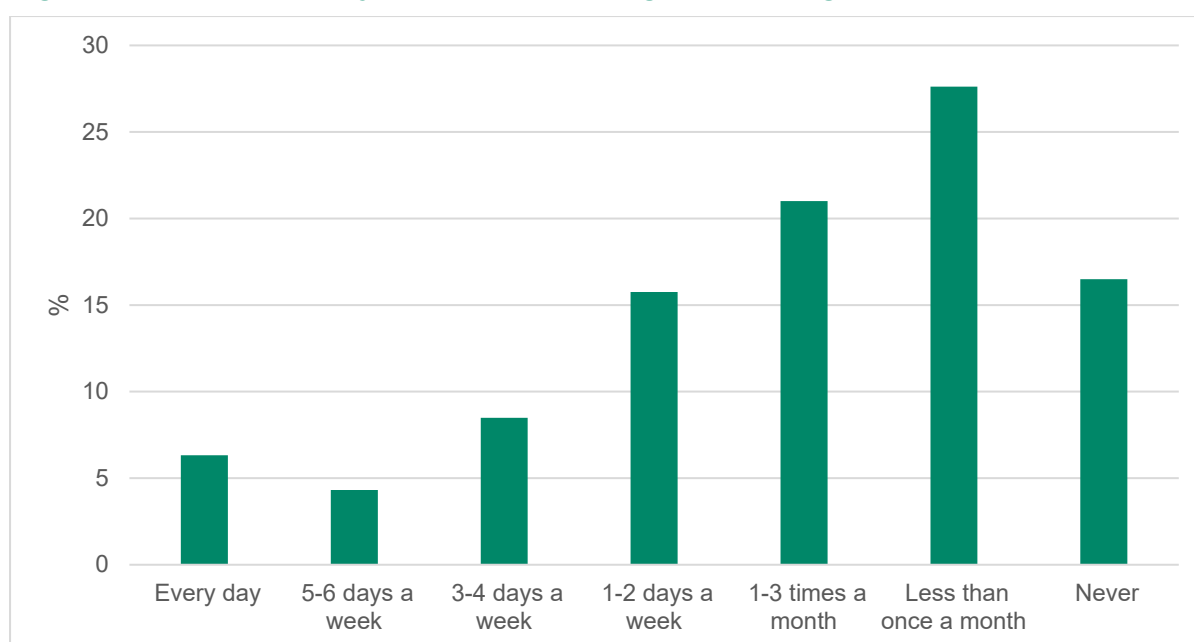
2.5.2 Respondent profile

Respondents provided details about themselves such as age, gender and ethnic origin. These questions were optional, and only around a third of respondents chose to provide this information. the percentages in Figure 2.1 are of those who provided this information and not of all respondents. Any difference in response by demographic profile should be treated with caution.

Figure 2.1 Respondent profile

Base: all respondents who provided demographic information (Gender 2785; Ethnicity 2802; Age 2808).

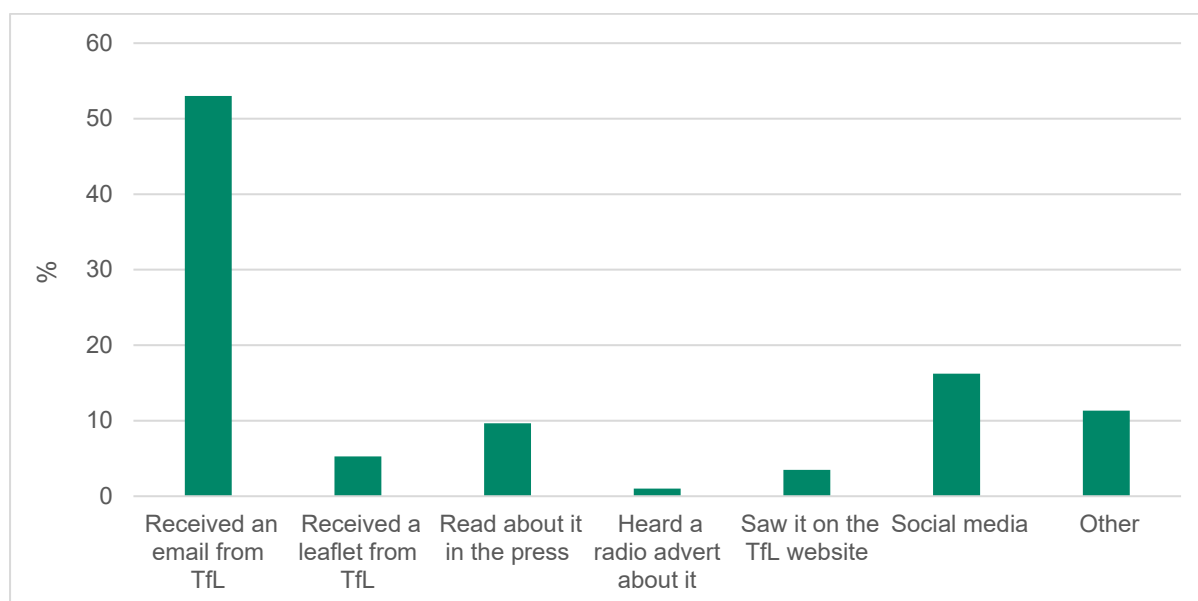
Other information was also gathered from respondents that could influence their opinion, including frequency of driving within the Congestion Charge zone.

Figure 2.2 How often do you drive in the Congestion Charge zone?

Base: all respondents who answered (8589)

2.5.3 How respondents heard of consultation

As part of a process to monitor and improve methods of communication to the public, TfL asked respondents how they heard about the consultation. Of those that responded, more than half (53 per cent) had received an email from TfL inviting them to take part.

Figure 2.3 How did you hear about this consultation (the main way you heard)?

Base: all respondents who answered (8600)

2.5.4 Respondent location

A total of 2642 respondents (25 per cent) provided a postcode. The vast majority of these were from the Greater London area. Figure 2.4 and Table 2.2 below shows the location of respondents and a breakdown of Greater London respondents by London Borough.

Figure 2.4 Respondent location map

Contains OS data © Crown copyright and database right 2021

Table 2.2 Respondent location

Location	Count	%
Barking and Dagenham	19	1
Barnet	59	2
Bexley	27	1
Brent	28	1
Bromley	29	1
Camden	143	5
City of London	42	2
City of Westminster	387	15
Croydon	43	2
Ealing	55	2
Enfield	24	1
Greenwich	30	1
Hackney	72	3
Hammersmith and Fulham	102	4
Haringey	36	1
Harrow	14	1
Havering	17	1
Hillingdon	24	1
Hounslow	31	1
Islington	146	6
Kensington and Chelsea	137	5
Kingston upon Thames	19	1
Lambeth	200	8
Lewisham	76	3
Merton	53	2
Newham	33	1
Redbridge	31	1
Richmond upon Thames	58	2
Southwark	189	7
Sutton	13	*
Tower Hamlets	63	2
Waltham Forest	37	1
Wandsworth	222	8
Outside Greater London	183	7
Total	2642	100

3. Key findings

3.1 Introduction

The key responses to the consultation are described in this section.

The start of the questionnaire set out TfL's aims to reduce traffic and congestion in central London to help achieve the objectives of the Mayor's Transport Strategy, including:

- Reducing private car use in central London
- Increasing trips made by walking, cycling or public transport
- Improving journey times for essential traffic including emergency services, buses and freight
- Helping to eliminate deaths and serious injuries from London's roads
- Improving air quality and reducing carbon emissions
- Creating vibrant and attractive open spaces

The questionnaire included a question on each key aspect of the proposed changes to the Congestion Charge, and respondents were also able to provide comments. For ease of reporting, comments are described alongside the relevant question:

- Importance of taking steps to reduce traffic and congestion in central London
- Importance of taking steps to increase the use of sustainable transport
- Effectiveness of setting the level of the Congestion Charge at £15 in achieving the aims
- Effectiveness of operating the Congestion Charge from 07:00-18:00 on weekdays in achieving the aims
- Effectiveness of operating the Congestion Charge on Saturday and Sunday and bank holidays between 12:00 and 18:00 in achieving the aims
- Effect of reopening applications for residents' discount of 90 per cent of the Congestion Charge in achieving the aims
- Effectiveness of increasing the "pay next day" charge to £17.50 and extending the deadline for making payment to three days in achieving the aims
- Importance of reimbursement arrangements for NHS staff and patients, care home workers, others during pandemics or epidemics in Greater London in achieving the aims;
- Comments on the Congestion Charge (open question)
- Comments if any positive or negative impacts have been identified and suggestions to mitigate the negative and enhance the positives (open question)

There was considerable overlap between the two questions and, therefore, the responses were combined and analysed by topic rather than by response for each question.

3.2 Importance of reducing traffic and congestion in central London

3.2.1 Overall summary

Eleven 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.

Table 3.1 How important is it to you that we take steps to reduce traffic and congestion in central London? (%)

	All responses	Public	Stakeholder *
Very important	33	33	55
Fairly important	16	16	11
Important	22	22	23
Slightly important	17	17	9
Not at all important	11	11	2
No opinion	1	1	0
Total	8601	8557	44

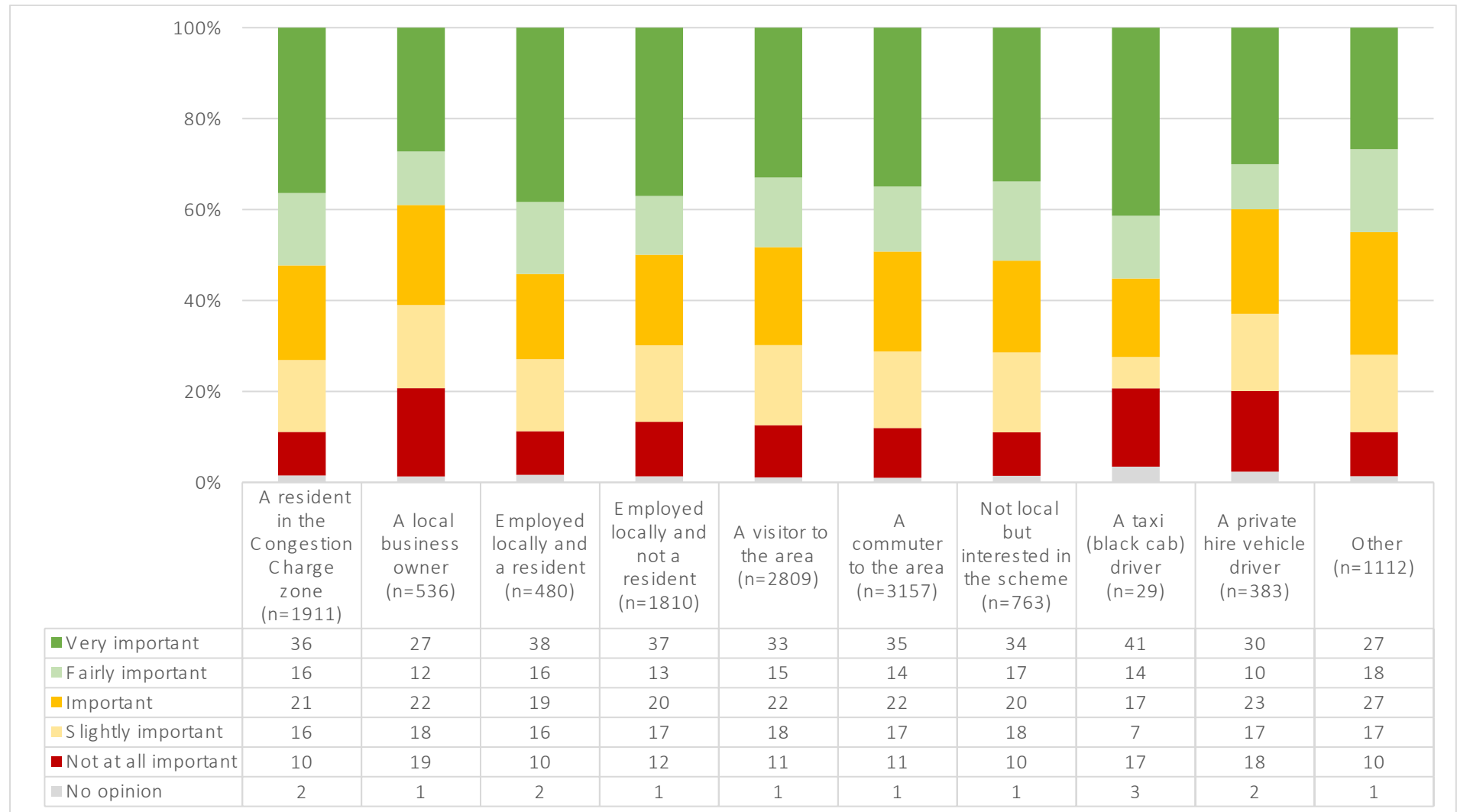
Base: all respondents (1031 public; 48 stakeholders; 1079 total did not answer this question)

*Only includes 44 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution

Roughly half of all members of the public, including residents in the Congestion Charge zone (52 per cent), those employed locally and a resident (54 per cent), and those not local but interested in the scheme (51 per cent) felt that it was either very or fairly important to take steps to reduce traffic and congestion in central London.

Local business owners were less likely to think it was very or fairly important (39 per cent) to reduce traffic and congestion in central London, with 19 per cent stating it was not at all important.

Figure 3.1 How important is it to you that we take steps to reduce traffic and congestion in central London?



Other statistically significant differences between sub-groups:

- There was a strong correlation between the frequency of driving in the area and the extent to which respondents felt it was important to reduce traffic and congestion in London. Of those who drive every day, 36 per cent felt it was very or fairly important compared to 41 per cent of those who drive once or twice a week and 69 per cent of those who never drive in the Congestion Charge zone
- Almost a fifth (19 per cent) of respondents who travel five days a week or more thought reducing traffic and congestion was not at all important compared to 3 per cent of those who drive once a month or less
- Respondents who are registered for a discount were more likely to consider traffic and congestion as not at all important, compared to those with no discount (14 per cent compared to 11 per cent)
- There was a stronger feeling of importance among those respondents who do not consider themselves to be religious than people of faith (56 per cent very important compared to 33 per cent)

3.2.2 Issues commonly raised

Around a fifth of respondents who provided a comment raised concerns that the proposed changes would not improve congestion, air quality and noise pollution. The concerns raised included:

- **Proposed changes will have no impact on congestion (6 per cent¹):** There was concern amongst respondents that the proposals would not improve congestion, and local business owners (8 per cent²) and commuters to the area (8 per cent³) were the most concerned. Respondents often referred previous Congestion Charges and how they felt they had little impact on levels of congestion, and they believed that reducing the hours will have no positive impact

“Since coming out of lockdown the traffic in central London has been worse than ever. All the changes to the Congestion Charge made no impact” (Employed Locally)

“None of this will achieve any aim to reduce any congestion or improve air quality - need much more drastic actions” (Commuter)

“The Congestion Charge has made no impact to traffic coming into London during the week, the roads are still congested” (Commuter)

- **Make congestion worse (6 per cent):** Similarly, some respondents were concerned congestion would increase and worsen because of the proposed changes to the Congestion Charge to reduce the charging period as compared to the temporary changes. Concerns referred to the reduced hours as being counterproductive as people will be encouraged to use their cars, increasing congestion outside of charging hours. Concerns were also raised about the proposals potentially pushing congestion to outside of the Congestion Charge zone as people try to avoid paying the charges

“The proposals as they stand will do nothing to tackle congestion, reduce car use or promote active travel. Rather they will do the opposite and encourage greater use of

¹ This is the percentage of members of the public who provided a comment

² This is the percentage of local business owners who provided a comment

³ This is the percentage of commuters to the area who provided a comment

private motor vehicles adding to already over-burdened roads across the capital” (Employed Locally)

“Reducing the hours during which the CC applies will once again encourage through-traffic to drive into London during evening commuter and weekend leisure hours, negatively impacting health, emissions, pedestrian safety and cycle safety. It would be a serious step back” (Commuter)

“Having the times of the Congestion Charge operate outside normal working hours causes more congestion on the major artery roads circulating the Congestion Charge zone which increases pollution and congestion” (Local Business Owner)

- **Proposed changes will have no impact to air quality (2 per cent) or will make air quality worse (3 per cent):** There was concern amongst some respondents that the proposals would not improve air quality or indeed make it worse. Those employed locally and not a resident (3 per cent) were the most concerned. The main reasons for their concern were that the reduced hours would not improve congestion and will therefore have no impact on air quality or potentially make it worse. Some felt that the Congestion Charge already had little effect on air quality and therefore feel the proposed changes will make little difference

“I feel that these proposals in terms of hours of operation are a major blow for preventing traffic and will lead inevitably to worsening car traffic, pollution and damage London’s environment” (Employed Locally)

“None of the proposals are going to have much effect on Improving air quality and reducing carbon emissions; and Increasing trips made by walking, cycling or public transport. They seem to be about supporting the hospitality industry only by allowing people to drive to restaurants etc” (Visitor)

“I do not support returning to shorter operating hours, and that doing so would be going against the goal of improving air quality and of supporting walking and cycling and public transport” (Employed Locally)

- **Proposed changes will make safety issues worse (2 per cent):** Some respondents were concerned about the impact the proposed changes would have on safety. Some felt that the reduced charging period could increase the number of vehicles on the road outside of the charging period, causing safety concerns for cyclists and pedestrians. Some respondents identified that this perceived reduction in safety could deter people from using active modes of travel, which is not the objective of the proposed changes

“I strongly oppose reducing the operating time of the congestion time from 22:00 to 18:00. As someone who commutes through central London by bike this will increase the congestion and could put me at greater risk from traffic and expose me to more air pollution. Consequently, I need the congestion times to remain the same as during the pandemic” (Commuter)

“Stopping the charge at 6pm will have a devastating effect on the safety, comfort and therefore volume of cyclists, people on foot, in wheelchairs etc. The volume of traffic is likely to skyrocket at 6pm just when many vulnerable road users will be leaving work and/or heading to evening activities thereby making these journeys dangerous and unpleasant” (Commuter)

“These proposals will increase cars on the road, increasing traffic during weekends and putting cyclists and pedestrians at risk. It will undo the increase in non-car users over the last year, and making roads more dangerous” (Resident)

On the other hand, there were some positive comments stating the proposal will have a positive impact on congestion and felt the proposals should go further:

- **Proposed changes will have a positive impact on congestion/will reduce it (1 per cent):** Some respondents specifically commented about how they felt the proposed changes would have a positive impact on congestion and would help to reduce it

“The proposed changes seem fair as it tackles the crux of the congestion issue in central London especially during peak hours of morning to end of business day” (Employed Locally)

“By reducing the Congestion Charging hours from 24/7 to 7am - 6pm on weekdays it will allow essential businesses (shops / supermarkets / hospitality etc) to organise deliveries outside of normal working hours when the roads are quieter, and less people are around. This will have the knock-on effect of improving air quality and also make the roads safer and less polluted” (Commuter)

“Congestion charge from 7 to 22 has been an extra burden on many people, and unfortunately, not everyone can walk or cycle to work. Returning Congestion charge back to 7 to 18 would help relieve this burden for many people and would still be effective in helping reduce traffic during the most of the day” (Not local but interested in the scheme)

- **Should extend the Congestion Charge zone/increase the boundary (2 per cent):** Some respondents suggested the Congestion Charge zone boundary should be increased, with those commuting to the area (3 per cent) and those employed locally and not a resident (3 per cent) saying this most often. Respondents generally felt that extending the boundary would be a positive measure to encourage and increase active travel and public transport use, whilst reducing car use and improving congestion, air quality and noise for residents

“The charge should be higher, in place for longer, cover a larger area, and with a reduced/no residents’ discount - people need to be discouraged from driving, and the Congestion Charge is an ideal tool to do this” (Employed locally)

“Extend it to the suburbs. There is a lot of traffic outside of central London but that is not being tackled” (Commuter)

“The charge should be extending geographically, with a higher charge in locations with better public transport (e.g. Central London)” (Commuter)

- **Proposed changes should be implemented sooner (1 per cent):** Some respondents felt the proposed changes should be implemented sooner, especially those who are employed locally and a resident (3 per cent). Some felt the temporary changes were implemented quickly and felt the reduced charging period should be implemented as soon as possible to allow businesses to recover after the Covid-19 pandemic

“Why wait till February to bring in the changes. It’s important the reduction in hours happens immediately to revitalise Central London NOW” (Other)

“It is about time these temporary measures are lifted, in my view the sooner we go back to 7-6pm on weekdays for Congestion Charge, the quicker the London economy will be boosted” (Employed Locally)

“I think if these proposals are agreed upon, the proposals should be acted upon as soon as possible. Hopefully earlier than February 2022...” (Resident)

3.3 Importance of increasing the number of people walking, cycling and using public transport in central London

3.3.1 Overall summary

Just over one in five respondents (22 per cent) felt it was not at all important to take steps to increase the number of people walking, cycling and using public transport in central London. All other respondents with an opinion considered it was important on a range from slightly important to very important.

Table 3.2 How important is it to you that we take steps to increase the number of people walking, cycling and using public transport in central London? (%)

	All responses	Public	Stakeholder *
Very important	28	28	43
Fairly important	13	13	14
Important	18	18	23
Slightly important	18	18	11
Not at all important	22	22	7
No opinion	2	2	2
Total	8601	8557	44

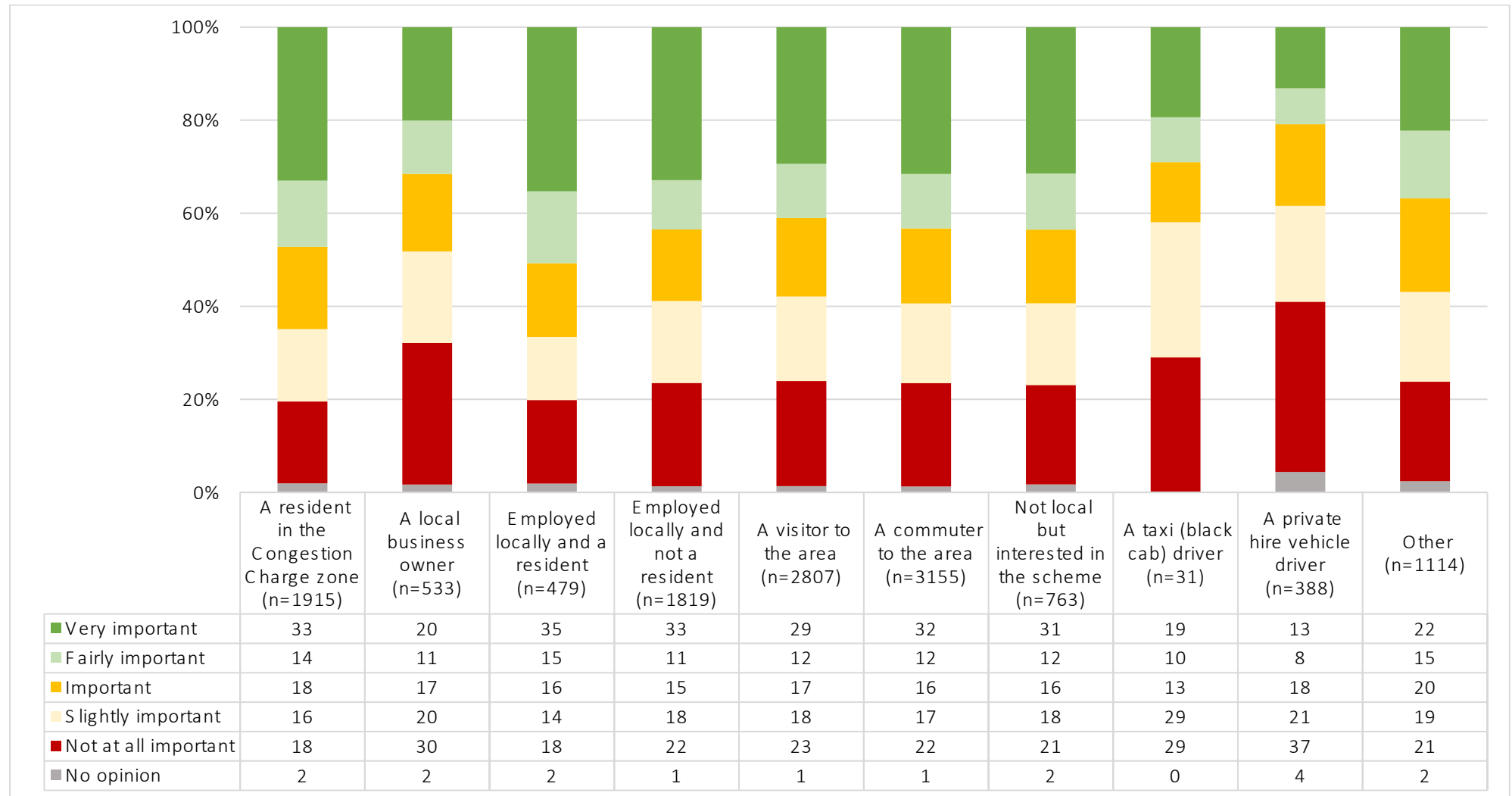
Base: all respondents (1031 public; 48 stakeholders; 1079 total did not answer this question)

*Only includes 44 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Those employed locally and a resident, along with Congestion Charge zone residents, were most likely to state that they felt it was very or fairly important to increase the number of people walking, cycling, and using public transport (50 per cent and 47 per cent respectively).

Private hire vehicle drivers and local business owners were less likely to say it was very or fairly important to increase the number of people using active travel and public transport, with 37 per cent and 30 percent respectively saying it was not at all important and 21 per cent and 31 per cent respectively saying it was very or fairly important to increase active travel and public transport.

Figure 3.2 How important is it to you that we take the steps to increase the number of people walking, cycling and using public transport in central London?



Other statistically significant differences between sub-groups:

- There was a strong correlation between the frequency of driving in the area and the extent to which respondents felt it is important to increase walking, cycling and public transport, with 42 per cent of those who drive every day and 34 per cent of those who drive 5-6 days a week feeling it was not at all important, compared to 15 per cent each for those who drive in the Congestion Charge zone less than once a month
- Younger respondents (aged 25 or under) had a stronger feeling of importance regarding how much TfL should be increasing the number of people walking, cycling and using public transport, with 55 per cent stating that it is very important compared to 39 per cent of those aged 26 or older
- Respondents who considered themselves to have a disability were more likely to say that increasing the number of people walking, cycling and using public transport is not important than those without disabilities (22 per cent compared to 14 per cent)

3.3.2 Issues commonly raised

Some comments were received about the impact on sustainable transport, with 2 per cent of respondents sharing concerns that the proposals will negatively impact sustainable travel, particularly active travel

“These changes are going to increase car use and make the centre unpleasant for pedestrians and cyclists” (Employed Locally)

“Reducing the operating hours of the Congestion Charge on weekdays and weekends, and reintroducing residents’ discounts will DECREASE the number of people walking, cycling and using public transport in central London. This is a retrograde step from a traffic congestion and environmental perspective, please reconsider it” (Employed Locally)

“Decreasing the operation times during the week will encourage driving as people will be trying to cycle home. It will release far more cancer-causing pollution into the air which is absolutely unacceptable. The roads will appear busier and stressful for those walking or cycling. If there is no charge after 18:00 I would forget getting the bus or bike, and I would just drive” (Visitor)

3.4 Effectiveness of setting the level of the Congestion Charge at £15

3.4.1 Overall summary

Over half (51 per cent) of respondents who gave a response to the question felt the proposed changes to the Congestion Charge would have a moderate or major effect in achieving the aims set out.

Table 3.3 How effective do you consider setting the level of the Congestion Charge at £15 in achieving our aims? (%)

	All responses	Public	Stakeholder *
No effect	25	25	28
Minor effect	19	19	9
Moderate effect	26	26	40
Major effect	25	25	21
Don't know	5	5	2
Total	8568	8525	43

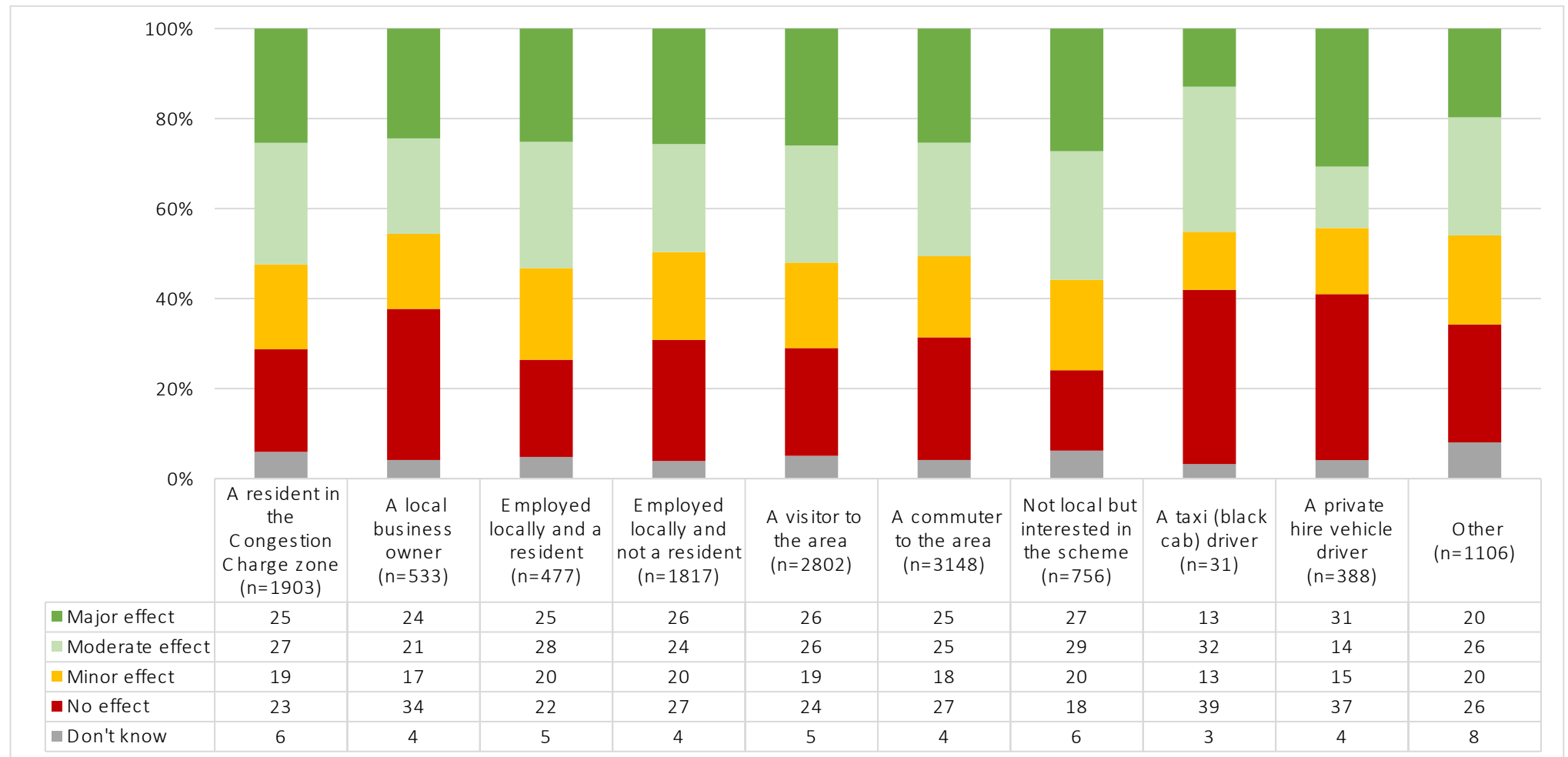
Base: all respondents (1063 public; 49 stakeholders; 1112 total did not answer this question)

*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Residents, visitors to the area and those interested in the scheme but not local were most likely to state that they felt a £15 Congestion Charge would have a moderate or major effect on achieving the aims (52 per cent, 52 per cent and 56 per cent respectively).

However, local business owners and private hire vehicle drivers were less likely to feel the £15 Congestion Charge would have a moderate or major effect, with half (50 per cent and 52 per cent respectively) saying the increased charge would have a minor or no effect.

Figure 3.3 How effective is setting the level of the Congestion Charge at £15 in achieving our aims?



Other statistically significant differences between sub-groups:

- There was a strong correlation between the frequency of driving in the area and the extent to which respondents felt the £15 Congestion Charge would have a moderate or major effect in achieving the aims, with 39 per cent of those who drive every day and 31 per cent who drive 3-4 days a week felt the charge would have no effect, compared to 22 per cent who drive in the Congestion Charge zone less than once a month and 20 per cent who never drive in the Congestion Charge zone
- Of younger respondents aged 25 or under, 42 per cent felt that it would have a major effect compared to 27 per cent of those aged over 25

3.4.2 Issues commonly raised

Overall, a fifth of comments referred to the effectiveness of setting the level of congestion at £15, of which, three quarters expressed concerns that the charge was too high and the remaining feeling the charge should be lower. Private hire vehicle drivers and those employed locally and a resident were more likely to comment on the charge level.

A detailed list of responses by respondent type can be found in Appendix A. The key comments in favour included:

- **Support the proposed charge level of £15 (2 per cent):** Some respondents expressed their support for the increased charge level of £15, particularly residents employed locally (4 per cent). Respondents often commented about how they felt the increased charge would act as a deterrent for car users and would be a positive step towards reducing congestion. However, some were concerned that increasing the charge would be limited in its effectiveness if the charging periods were reduced

"I would like to see congestion charging become more stringent to deter unnecessary traffic and fund non-polluting means of travel" (Other)

"I would like the Congestion Charge to stay at £15 between 7am and 10pm every day of the week" (Resident)

"Keeping the £15 charge is great but reducing the hours is not" (Employed Locally)

- **Charge should be higher (3 per cent):** Some respondents who commented wanted the charge to be higher than the proposed £15. Those employed locally and a resident (5 per cent), and commuters to the area (4 per cent) made comments supporting a higher charge. Generally, these respondents stated the charge should be more stringent to discourage people from driving into London

"Driving into London should be prohibitively expensive, and therefore the cost should be very high, such as £30" (Employed Locally)

"£15 is not a deterrent for many people. The charge should be significantly higher" (Employed locally)

"£15 is too low considering how much burden each car entering the Congestion Charge zone puts on the entire city and its residents. In my opinion it should be much higher" (Visitor)

The key comments against the proposed £15 charge included:

- **Oppose the charge level (£15) or support a lower charge (8 per cent):** Some respondents provided comments disagreeing with the proposed £15 charge or suggested that the charge should be reduced. Private hire vehicle drivers (10 per cent), those who are not local but interested in the scheme (9 per cent), local business owners (8 per cent), visitors (8 per cent) and commuters (9 per cent) raised this. Some respondents referred to the need for lower charges as they felt it would disproportionately affect low-income households who would struggle to pay £15 a day for necessary journeys. Other respondents felt there would be negative effects on businesses and London's economy as respondents felt people will be deterred from entering London because of the £15 charge (see section 3.11 on further comments about the impact on businesses)

"The proposal to leave Congestion Charge at £15 is a tax on the poor. To some users the £15 could leave a massive dent in earnings" (Commuter)

"The daily charge is too high, many people are suffering financially since this pandemic. Many people are in low paid jobs and sometimes it might be cheaper or easier to drive rather than take public transport or cycle, especially if you have to take children to school first. The daily charge should be between £8-10. The Congestion Charge will just put people off working in or visiting London" (Not a local resident but interested in the scheme)

"The charge should not be more than £10 daily as the public and businesses of London have suffered so much loss because of this and now because of the pandemic" (Other)

- **Charge should return to pre-pandemic levels (£11.50) (7 per cent):** Returning the charge to pre-pandemic levels (£11.50) was suggested by some respondents, feeling that it was an affordable charge that still allows people to travel when necessary and encouraging people to support London's businesses and economy. Private hire vehicle drivers (11 per cent) raised this. Some respondents expressed discontent at the proposed charges and the Mayor bringing forward the proposals

"I would like to express my opposition to the proposal to keep the Congestion Charge at £15. In June 2020 the Mayor promised that the decision to increase the charge from £11.50 to £15 would be temporary; I would now expect the promise to be honoured and the charge to be kept at £11.50" (Other)

"Reduce the daily charge back to £11.50. I strongly believe leaving the charge to £15 is complete ludicrous and have an impact on businesses which you are aware of are struggling in Central London" (Other)

3.5 Effectiveness of operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday).

3.5.1 Overall summary

More than three fifths (62 per cent) of respondents who gave a response to the question felt the £15 charge would have a moderate or major effect on achieving the aims, whilst 20 per cent felt that it would not have an effect.

Table 3.4 How effective is operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday) in achieving our aims? (%)

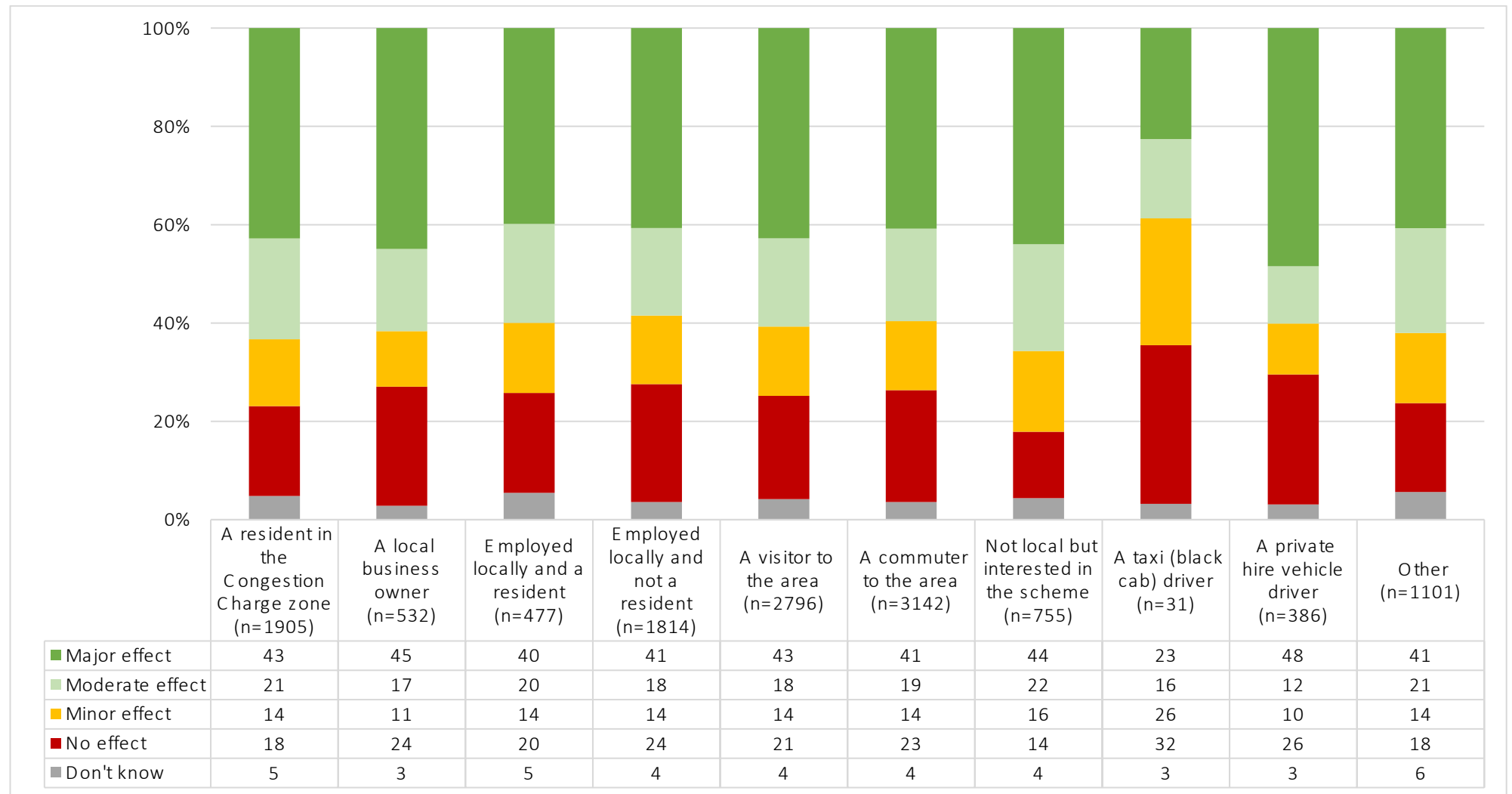
	All responses	Public	Stakeholder *
No effect	20	20	19
Minor effect	14	14	23
Moderate effect	20	20	21
Major effect	42	42	37
Don't know	4	4	0
Total	8551	8508	43

Base: all respondents (1080 public; 49 stakeholders; 1129 total did not answer this question)

*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Local business owners, those employed locally but not residents and private hire vehicle drivers were most likely to feel that the Congestion Charge operating from 07:00-18:00 on weekdays (Monday to Friday) would have little or no effect (36 per cent, 38 per cent and 37 per cent respectively).

Figure 3.4 How effective is operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday) in achieving our aims?



Other statistically significant differences between sub-groups

- There was a small correlation between gender and those who thought the weekday charging hours would influence levels of congestion, with 66 per cent of women feeling it would have a moderate or major effect, compared to 58 per cent of men, and 21 per cent of men stated that it would have no effect on the aims
- Respondents aged under 60 were more likely to state that the weekday charging period would have no effect than those aged over 60 (22 per cent compared to 13 per cent). By contrast, the older age group were more likely to state it would have a moderate effect (29 per cent compared to 21 per cent)

3.5.2 Issues commonly raised

Around a quarter of respondents who provided a comment, referred to the Monday to Friday charging period. Responses were complex and some overlap with comments on weekend charging (See section 3.6.2). Around three-quarters of the comments received did not agree with the proposed changes and wanted the charging period reduced in some way. The remaining comments either agreed with the proposals or wanted them to go further. A detailed list of responses by respondent type can be found in Appendix A.

The main comments regarding the changes included:

- **Do not support the new charging period/ hours (2 per cent):** Respondents who shared this comment often explained that they felt the proposed charging period would be going backwards and would not be enough to achieve the aims.

“The hours of operation should stay as they currently are i.e. 7am to 10pm. Reducing the Congestion Charge operating times will encourage traffic and pollution and is not consistent with aims to reduce both” (Commuter)

“I am wholly opposed to any relaxation of the CC times: if you want to encourage people to walk and cycle and to use public transport then stopping the CC at 1800 is ridiculous: that's just the time that many people are leaving work, especially those cycling or walking who leave late to avoid the traffic” (Resident)

- **Charging period/hours should replicate those used through the temporary changes (4 per cent):** Respondents commented about the need to keep the extended hours in order from Monday – Sunday to reduce car use, and some felt that traffic levels have decreased during the temporary charges and are therefore worth keeping as they have achieved the aims. Other respondents felt that the longer charging period is a deterrent to people driving into London, and they believed that this had also encouraged active and public transport use in the city

“In order to reduce car use, the current temporary covid measures should be continued” (Employed Locally)

“Keep the temporary arrangements, car journeys need to be discouraged as much as possible! Residents should not receive a discount with excellent public transport connections” (Commuter)

“Reducing the hours of operation and removing temporary measures will only increase congestion and pollution. Levels set out during the pandemic should be maintained or better still further increased to reduce congestion and pollution” (Employed Locally)

- **Support the new charging period/ hours (general) (2 per cent):** Generally, these respondents supported the new charging period as they wish to see the temporary charging hours reduced from the temporary changes for the economy to recover, as people travel into the zone for leisure purposes, boosting the night-time economy

“Reducing the Congestion Charge hours to 7am-6pm will help many businesses recover from the economic impact of the pandemic” (Employed Locally)

“The decision to remove the evening charging hours is very good move for businesses, restaurants and entertainment venues” (Other)

- **Mon-Fri charging hours should replicate those used through the temporary changes (1 per cent):** Commuters (2 per cent) and those employed locally and a resident (2 per cent) were more likely than others to specifically say Monday to Friday charging hours should stay at the level set through the Covid-19 pandemic. Respondents felt the extended hours successfully deter car use through the weekdays and therefore improve congestion and air quality. However, some of these respondents also felt the weekend charges should not replicate the temporary charging hours as it's important that businesses and London's economy benefits from trade at the weekend

“Reducing the hours of operation from what they are now to only be in operation between 7am-6pm M-F is not going to encourage people to take more public transport” (Employed Locally)

“Reducing the hours when the Congestion Charge operates is entirely at odds with the objectives of trying to reduce traffic and make our streets more pedestrian and cycle friendly. Please keep the charges and arrangements that were introduced during the pandemic!” (Commuter)

- **Charging period for Monday to Friday should return to pre-pandemic (07:00-18:00) (18 per cent):** Private hire vehicle drivers (27 per cent), visitors to the area (20 per cent), local business owners (20 per cent) and those employed locally but not a resident (19 per cent) were most likely to make these comments. Generally, comments support the new Monday to Friday charging period as they wish to see the temporary charging hours reduced in order for the night-time economy to recover, as people come in for leisure, theatre, restaurants and more

“As a business owner who operates within the Congestion Charge zone. The times of 7am to 10pm has been a nightmare. Delivery companies charge over the top price. Customers are not able to come because 10pm is not a time people like to dine. But if the proposed changes happen it will help my business as well as many more immensely” (Local Business Owner)

“I strongly believe that the days hours within which the Congestion Charge should operate should revert back to the pre-Covid position. This is essential for the recovery of the retail, hospitality and entertainment sectors, all of which have suffered to an unbelievable extent during the Covid restrictions” (Visitor)

“I think it is very important for the London economy to return to operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday). (This is the same as before the pandemic)” (Resident)

- **Charging period/hours should be reduced (general comments) (3 per cent):** Respondents felt charging periods should be reduced to allow for people to enjoy the night-time economy in London and not be deterred by a charge and to implement reduced hours at weekends to support London economy on Saturdays and Sundays

"I would like to see the operating times for the CC reduced to support the local shops and economy" (Commuter)

"The Congestion Charge time should be reduced so that we can access the Congestion Charge zone in the evenings and at weekends when traffic is less heavy so that we can support local businesses in the Congestion Charge zone" (Employed Locally)

- **Other specific time changes suggested (5 per cent):** Respondents suggested other specific time changes. Frequent suggestions included the charge should end later than 18:00, but before current 22:00: Some respondents felt later charging times would better support the aims of the scheme in reducing congestion. Many of the comments included concerns surrounding pedestrian and cycle safety as the proposed charge does not include rush hour traffic and therefore busier roads pose a threat to those cycling and walking home from work

"The weekday Congestion Charge should be extended to at least 19 - 20.00 in the evening to encourage safe commuting by bicycle" (Other)

"The 18:00 cut off does not seem right to me. It invites people to drive in for evening events & (possibly) risks drunk driving later. It would make streets more clogged with cars in the evening & would certainly not contribute to improvements in the walking or cycling environment after 18:00" (Visitor)

"Why not bring the time down from 22:00 to 20:00. This will help night out goers, but we will avoid peak hour traffic. Bring the limit to 18:00 does not help with traffic reduction, it will just delay the traffic by an hour" (Resident)

"7am to 6pm Monday to Friday is too short to have a significant impact. 6am to 7pm would be much more effective" (Taxi Driver)

3.6 Effectiveness of operating the Congestion Charge on Saturday and Sunday and bank holidays between 12:00 and 18:00

3.6.1 Overall summary

Almost a half (45 per cent) of respondents who gave a response to the question felt operating the Congestion Charge on Saturday and Sunday and on bank holidays between 12:00 and 18:00 would have a moderate or major effect on achieving the aims. Likewise, a third (33 per cent) thought the charges would have no effect on managing congestion.

Table 3.5 How effective is operating the Congestion Charge on Saturday and Sunday and bank holidays between 12:00 and 18:00 in achieving our aims? (%)

	All responses	Public	Stakeholder *
No effect	33	33	40
Minor effect	17	17	19
Moderate effect	16	16	14
Major effect	29	29	26
Don't know	5	5	0
Total	8526	8484	42

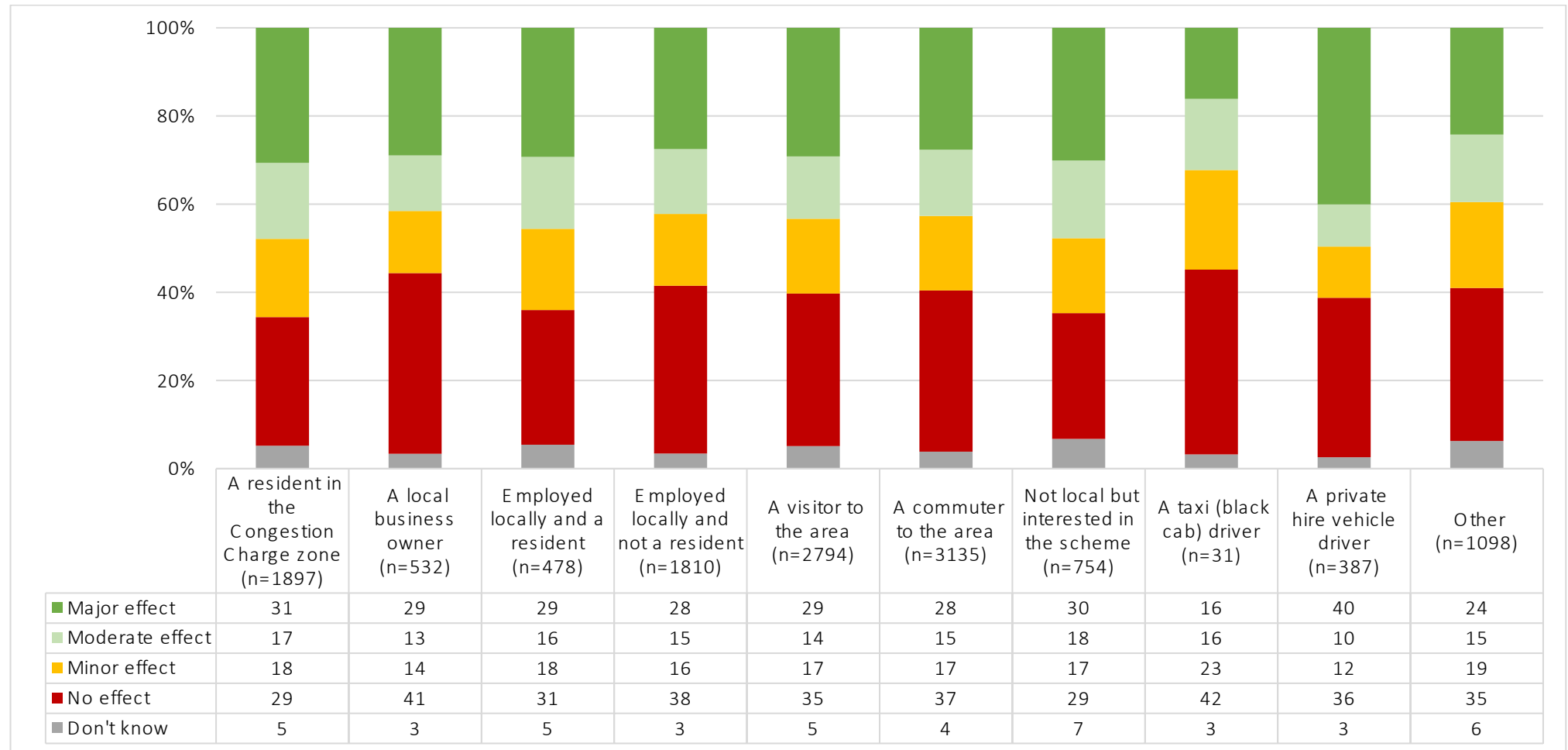
Base: all respondents (1104 public; 50 stakeholders; 1154 total did not answer this question)

*Only includes 42 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Residents living within the Congestion Charge zone and private hire vehicle drivers were most likely to state that they felt operating the Congestion Charge from 12:00-18:00 on weekends and bank holidays would have a moderate or major effect on achieving the aims (48 per cent and 50 per cent respectively).

Local business owners were less likely to feel the proposed weekend and bank holiday charges would have a moderate or major effect on achieving the aims, with over half (55 per cent) believing they would have little or no effect.

Figure 3.5 How effective is operating the Congestion Charge on Saturday and Sunday and on bank holidays between 12:00 and 18:00 in achieving our aims?



Other statistically significant differences between sub-groups:

There was a correlation between the frequency of driving in the area and the extent to which they felt the weekend and bank holiday Congestion Charge periods would influence the aims. Of those who drive into the Congestion Charge zone every day, 49 per cent stated that the changes would have a moderate or major effect, compared to 41 per cent of those who never drive into the Congestion Charge zone.

3.6.2 Issues commonly raised

Overall, half of respondents who commented referred to the effectiveness of the Congestion Charge operating on Saturday and Sundays and on bank holidays between 12:00 and 18:00. Visitors to the area, those not local but interested in the scheme, private hire vehicle drivers, and those employed locally and not a resident, in particular provided comments.

A detailed list of responses by respondent type can be found in Appendix A. Around a fifth of comments on the weekend charging supported the proposals or wanted them to go further including:

- Support Christmas Day to New Year Day (inclusive) charge free period (2 per cent):**
 The question about weekends and bank holidays outlined that there would be no charge in the period between 25th December and the New Year's Day bank holiday. Respondents in support of the Christmas Day to New Year charge free period mentioned how leisure and social activities at this time are important and that people should not be penalised for coming into London over this period

"The no charge period between Christmas and New Year is helpful, sensible and welcomed" (Other)

"...No charge between Christmas & New Year is great as now I know I can book the theatre" (Visitor)

"I agree with the relief of this payment between Christmas and NY as it encourages people into the city when many people have gone away to visit friends and family at this time" (Visitor)

- Charging period should apply 24/7 all the time (1 per cent) or Charging period should be extended (1 per cent):** Respondents who work in the area including those who live there or are commuters (2 per cent each) were most likely to feel that the charging period needed extending. Reasons given included air quality outside of the Congestion Charge period and a feeling that the time periods will only impact a fraction of drivers in Central London

"...I strongly believe that keeping the Congestion Charge zone operating 24/7 is a very important means to stop private car use in central London, reducing pollution and encouraging sustainable transport" (Commuter)

"I would like to see the charge run 24 hours a day, as we have manic speeding drivers waking us up every morning just before 7am racing to beat the charging time" (Resident)

Around four-fifths of comments about weekend charges raised concerns including:

- There should be no charge on weekends (Saturday and Sunday) (32 per cent):**
 Private hire vehicle drivers (34 per cent), visitors to the area (36 per cent), those not local but interested in the scheme (32 per cent) and those employed locally (30 per cent) were more likely to oppose a weekend charge than others. Respondents frequently referred to the London economy and particularly the hospitality and entertainment industries, as well as the retail sector and felt that the Congestion Charge is harmful to these industries. Other respondents felt that the weekend was when people travelled into the area to visit family members

“The Congestion Charge hours should return to the hours pre-pandemic with no Congestion Charge at the weekend. Cultural events take place at the weekend e.g. theatre, cinema, concerts and not everyone can travel by public transport, especially older and vulnerable individuals” (Other)

“The charge is great BUT you need to scrap the charge on weekends. Many people in zones 2,3, 4 find it hard to get into town on weekends, and the weekend was the ONE time that people would venture anywhere near the West End. Most people I know do not bother with going into town at all” (Private Hire Vehicle Driver)

“I disagree with proposal to keep the Congestion Charge at Weekends. Weekends are times when people are off work spending time with their families. The train fares and cost of living in London are already expensive enough, and people should not be charged more to go into London. People shouldn't be charged more for going into London for leisure purposes, or to go to their place of worship on a Sunday. I mean, surely having a Congestion Charge at the Weekend is like having to pay Peak Train fares at the Weekend.” (Employed Locally)

Other specific time changes suggested (that do not fit into the other suggestions) (5 per cent) included:

- Some respondents specifically requested for shorter charging periods over the weekend so that residents and visitors can enjoy the afternoon and early evening economy in London

“I STRONGLY Object to the Congestion Charge on the weekend during the day, since this will have a dramatic impact on the households who have family outside the Congestion Charge zone, who come into the Congestion Charge zone on the weekends, when it is already quieter. A much more effective time would be in the evening on Weekdays and Saturday, when you get people coming to the theatre from outside the Congestion Charge zone” (Resident)

“I don't understand the point of having the Congestion Charge between 12pm-6pm on weekends. The businesses i.e., Retail, restaurants, hospitality, arts & culture, etc. have struggled badly during CV-19 and all the lockdowns and restrictions. Please either scrap the afternoon charge or switch to 6am-12pm” (Employed Locally)

- The charging period should start later on Sunday. These comments were particularly provided by those who attend church. Comments highlight the proposed weekend start time at 12:00 means many people travelling to places of worship may be discouraged or prevented from doing so as services generally run into the Congestion Charge period. Comments suggest a later start to allow people to attend places of faith without being penalised by the charge

“For the weekends, and particularly Sunday, can the start time be put back to 1pm as many people have been put off going their usual place of worship because of the charge” (Visitor)

“I don't understand the rationale for operating the charge on Saturdays & Sundays from 12pm - I attend an 11:00 church service on Sundays to provide childcare and this timing would mean I can drive to church without being charged but not home again. This seems odd to me and appears to penalise communities of all faiths who worship at weekends” (Employed Locally)

“Church attenders would still be unable to use cars as most services don't end till between 12pm to 12.45pm, and as many are elderly, this deprives some lonely souls of company and fellowship. Sunday hours should be 2pm to 6pm or 8pm” (Visitor)

- **Oppose changes to include a charge on bank holidays (6 per cent):** Visitors to the area (7 per cent), private hire vehicle drivers (7 per cent), local business owners (7 per cent) raised concerns about charges during bank holidays. Comments specifically referred to the negative impact this will have on the economy, feeling the proposal will stop people visiting London for leisure purposes

“The charge should be removed entirely from weekends and bank holidays. Again, the current extended times have no impact on congestion since they do not target peak traffic times, but the reopening of London to leisure and community is stifled” (Local Business Owner)

“Weekends and bank holidays should be free as before, roads are much quieter in these days with no heavy traffic or congestion, also many businesses rely on weekends and bank holidays to sell more when people tend to go to central London when there is no CC fee” (A private hire vehicle driver)

“Congestion Charge at weekends and bank holidays should not be maintained. It reduces the number of people going into central London to shop and access restaurants and theatres and should only be a Monday to Friday charge” (Visitor)

- **There should be no charge for Sundays (5 per cent):** Comments related to the need for one day in the week for people to access London without paying charges and the benefits this can have on leisure and the economy

“Businesses have been hit hard by the charge being run on Sundays as we have lost the out-of-town day trip crowd. Many people used to visit Westminster for the parks, galleries, and museums pre-Covid which boosted the local economy. Removing the charge on Sunday’s would bring this business back” (Local Business Owner)

“I think there should be no Congestion Charge on Sundays. Although there is an aim for more people to use public transportation, walk, cycle - that sometimes is not possible for elderly people, people with small children, people with disabilities, people moving large objects and having one day a week when they can go into London with the expense/anxiety of a congestion fee is a good idea” (Visitor)

Many respondents specifically commented about the effect of Sunday charges on faith groups practicing their religion. These comments addressed the issue those trying to practice their faith face when trying to travel on a Sunday, when they are restricted by charges due to the proposals. These respondents highlighted that faith groups may feel isolated if they aren’t able to access their faith communities

“There should be no charge on Sundays, for those travelling to and from a place of worship. Under the current temporary arrangement, those who have attended the same service for decades, with all the spiritual and personal benefit that follows (including and especially for lonely elderly people), have no longer been able to attend due to the cost, to their great detriment” (Employed Locally)

“Even the Congestion Charge between 12 and 1800 on Sunday has a deleterious effect of people trying to attend church and other religious services. Making Sunday a charge free day would help people wishing to worship in City parish churches and other religious places of worship” (Not local but interested in the scheme)

3.7 Effect of reopening applications for the residents' discount of 90 per cent of the Congestion Charge

3.7.1 Overall summary

Over half (52 per cent) of respondents who gave a response to the question felt reopening applications for the residents' discount of 90 per cent would have a moderate or major effect on achieving the aims, whilst 23 per cent thought the charges would have no effect on achieving the aims.

Table 3.6 How effective is reopening applications for the residents' discount of 90 per cent of the Congestion Charge in achieving our aims? (%)

	All responses	Public	Stakeholder *
No effect	23	23	37
Minor effect	13	12	19
Moderate effect	15	15	14
Major effect	37	37	23
Don't know	12	12	7
Total	8509	8466	43

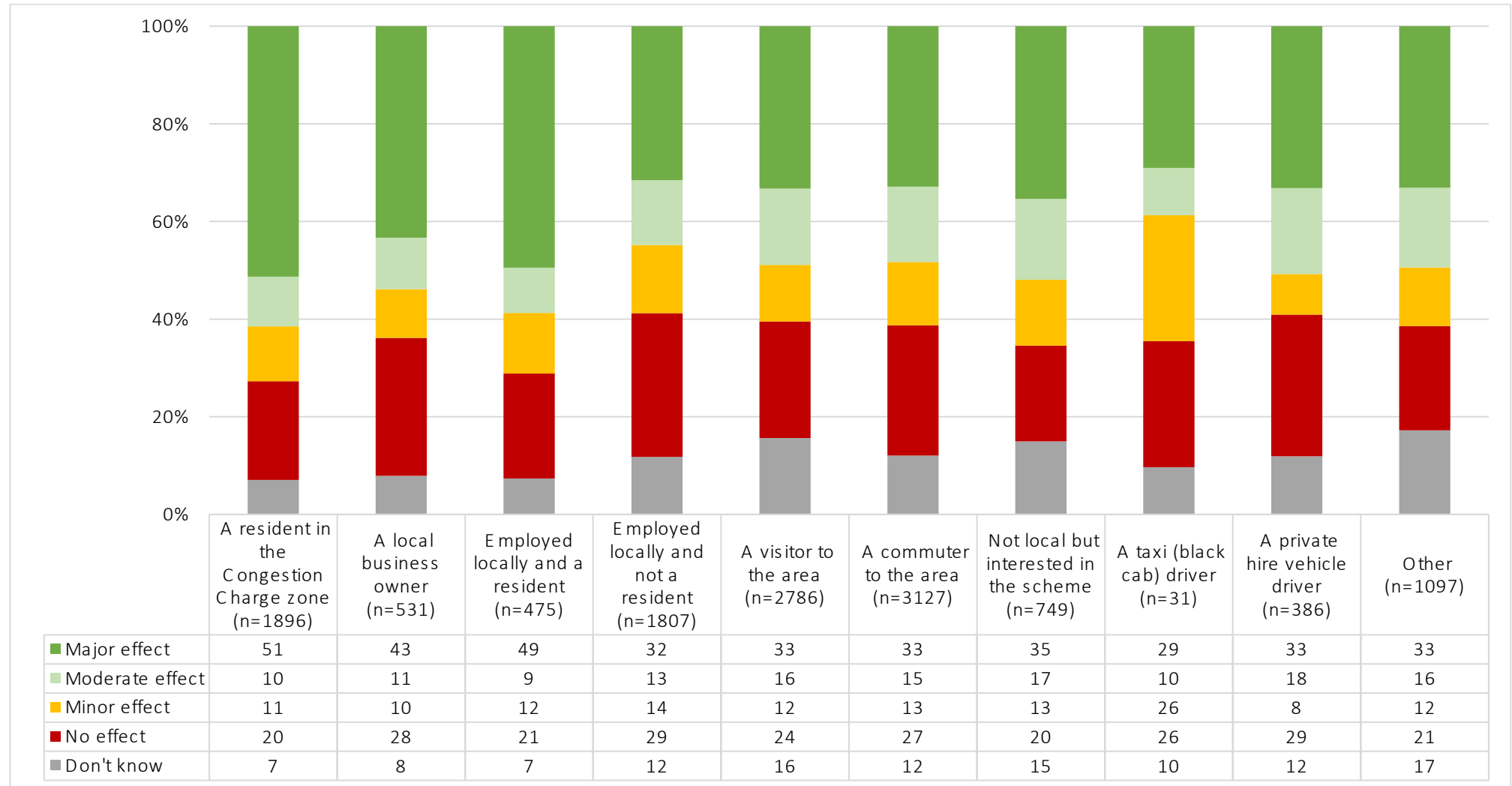
Base: all respondents (1122 public; 49 stakeholders; 1171 total did not answer this question)

*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Residents in the Congestion Charge zone were most likely to state reopening applications for the residents' discount would have moderate or major effect (61 per cent).

However, those employed locally but not a resident were less likely to feel reopening the residents' discount would have a moderate or major effect (45 per cent), with 29 per cent believing it would have no effect in achieving the aims.

Figure 3.6 How effective is reopening applications for the residents' discount of 90 per cent of the Congestion Charge in achieving our aims?



Other statistically significant differences between sub-groups:

- There was a strong correlation between the frequency of driving in the area and the extent to which they feel reopening residents' discounts would influence congestion, with 44 per cent of those who drive in the Congestion Charge zone weekly or more stating that the changes would have a major effect, compared to 33 per cent of those that drive less frequently
- Respondents of faith are significantly more likely to believe it will have a major effect than those who follow no religion (37 per cent compared to 29 per cent)

3.7.2 Issues commonly raised

Around a fifth of respondents who commented referred to the reopening of residents' applications for a discount of 90 per cent of the Congestion Charge.

A detailed list of responses by respondent type can be found in Appendix A. The main comments included:

- **Support of the residents' discount (11 per cent):** Residents in the Congestion Charge zone (34 per cent) gave their support for the residents' discount. Generally, comments relate to the financial burden of having no discount when living within the Congestion Charge zone, respondents note it is not generally residents who drive within the city and therefore should not be penalised just for living in London

"I think that the resident's discount should be entirely reinstated. Without the residents' discount, Londoners living within the Congestion Charge are unfairly punished for congestion which is not their fault. Living in central London should not impose arbitrary further costs" (Resident)

"People inside the Congestion Charge zone only use their cars when necessary, not just for going for a leisurely drive in the centre of London. The roads get congested by cars coming in the Congestion Charge zone from outside" (Resident)

"Penalising Londoners who live within the Congestion Charge zone by charging the full amount seems completely unfair and can have a serious impact in particular on resident's mobility and ability to work. The 90% discount seems like a reasonable balance" (Resident)

- **Should be higher (1 per cent):** Residents in the Congestion Charge zone (4 per cent) support a residents' discount higher than 90 per cent. Respondents highlighted the demand for 100 per cent discounts for residents as they felt residents should not be penalised for living in London, where they already pay a premium and higher taxes to live in London

"I think residents living in the Congestion Charge zone should have 100% discount and be exempt altogether - it's where they live!" (Employed Locally)

"Residents' discount should be 100%. Residents in London, especially central London, already pay a premium for ownership of a private vehicle via very restricted parking permits or higher fuel costs that translate to higher tax revenue" (Resident)

"As a resident in the Congestion Charge zone I already pay for parking on the road, road tax, Congestion Charge and council tax. Residents should be fully exempt from the Congestion Charge and so should their visitors" (Resident)

- **Discounts should be given to residents just outside the Congestion Charge zone (1 per cent):** Local business owners (2 per cent) and those employed locally but not a resident (2 per cent) in particular, suggested residents just outside of the Congestion Charge zone should receive a residents' discount. Respondents suggested that extending the discount 'boundary' to include those living on the periphery of the Congestion Charge zone is fair, highlighting that those living just on the edge of the Congestion Charge zone

are penalised and must pay full prices despite being near others who do receive the residents' discount

"I think you need to consider residents that live in Zone 1 (and possibly 2) and reduce or eliminate Congestion Charge zone - we are locals not tourists and it is fair to say we do need to access the congestion zone at times for personal reasons" (Other)

"Discounts should be available for a wider group of Londoners who live near the Congestion Charge zone. I live just outside the Congestion Charge zone but have to pay £15 to go to my local shops. This is not fair to me or the local businesses especially when so many central businesses are struggling. We should be striving to bring central London back to life by making it accessible and supporting those businesses" (Employed Locally)

"People near the Congestion Charge zone are the worst impacted as they have to drive miles around it (bad for the environment). There should be further discounts for people living very near it (within a mile) and people near it (within 2 miles)" (Employed Locally)

- **Should be no residents' discount (2 per cent):** Some commuters to the area (4 per cent) were more likely to comment against the residents' discount. Respondents highlighted that residents' discounts may encourage car ownership, making travel by car a cheaper, more convenient way for residents to travel rather than using the active or public travel London offers, contradicting the aims to reduce congestion and improve air quality

"Reopening the residents' discount programme will promote car ownership within the Congestion Charge zone, and the low charge may result in residents opting to use their cars for more journeys in order to get value for money from the £1.50 charge. It should remain closed for new applicants to discourage car ownership" (Commuter)

"...scrap the residents' discount scheme. These proposals will lead to increased levels of traffic on already congested roads and exacerbate air pollution levels" (Local Business Owner)

- **Should be lower (1 per cent):** Commuters to the area (2 per cent) felt the residents' discount should be less than 90 per cent. These respondents generally referred to a 90 per cent residents' discount being excessive and counterproductive to TfL's aims to reduce car use

"I'd decrease the discount for residents of the Congestion Charge zone gradually from 90% to around 50% to encourage active travel and to help fund active travel infrastructure" (Commuter)

"A 90% discount for residents is madness and will only encourage car use and ownership in the Congestion Charge zone where it should be strongly discouraged, in line with TfL's aims and the governments 'Gear Change' strategy" (Employed Locally)

"There should be a much-reduced residents' discount, as 90% is far too high and will not do anything near enough to reduce car use inside the Congestion Charge zone. Car owners inside the Congestion Charge zone have almost no disincentive to drive, despite having excellent transport available and having both walking and cycling available for a huge number of destinations" (Commuter)

3.8 Effectiveness of increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days.

3.8.1 Overall summary

Two fifths (42 per cent) of respondents who gave a response to the question felt increasing the “pay next day” charge to £17.50 and extending the deadline for making the payment to three days would have a moderate or major effect on achieving the aims, whilst 31 per cent thought the charges would have no effect.

Table 3.7 How effective is increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days in achieving our aims? (%)

	All responses	Public	Stakeholder *
No effect	30	30	36
Minor effect	18	18	31
Moderate effect	19	19	19
Major effect	23	23	14
Don't know	10	10	0
Total	8495	8453	42

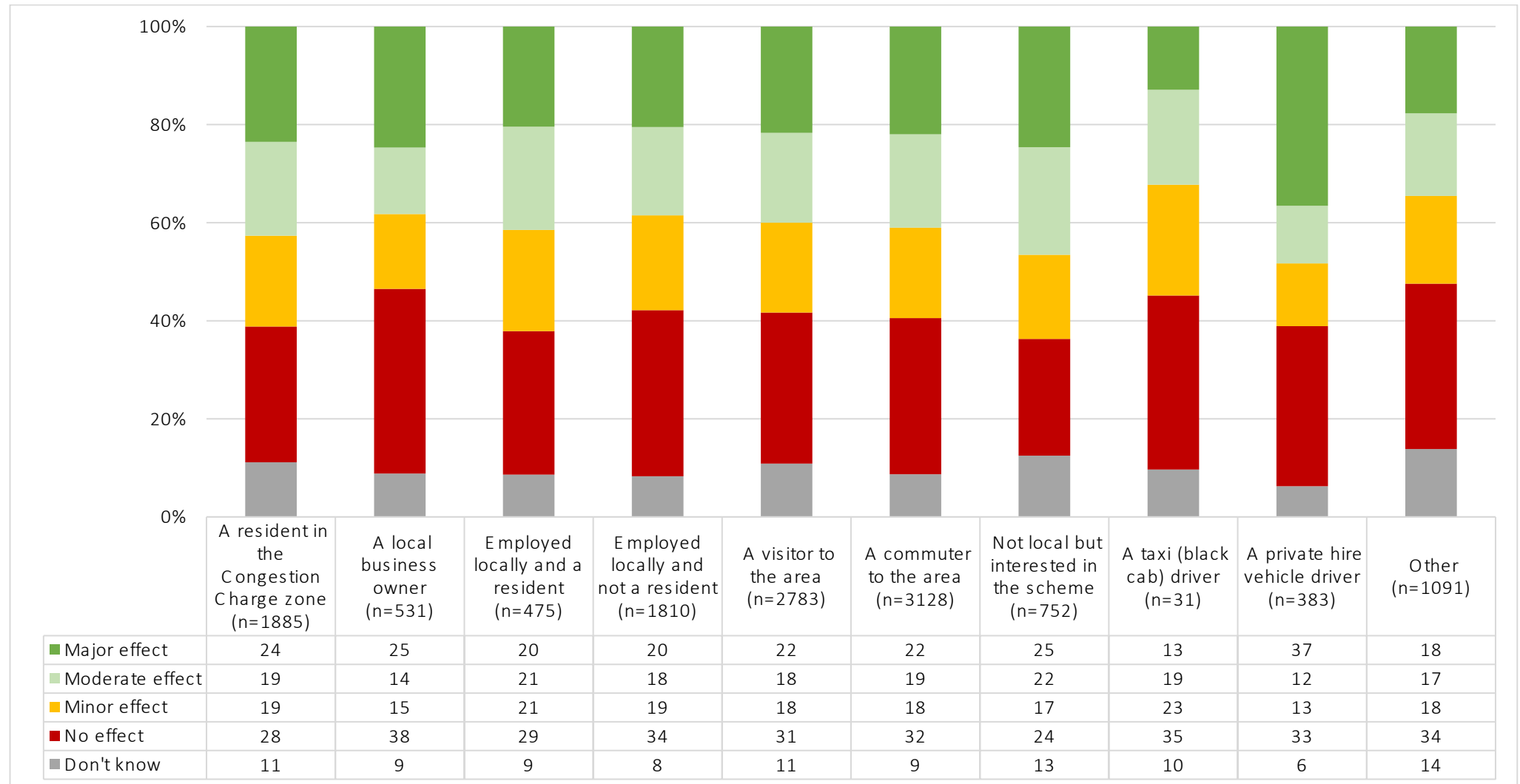
Base: all respondents (1135 public; 50 stakeholders; 1185 total did not answer this question)

*Only includes 42 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Those not local but interested in the scheme and private hire vehicle drivers were most likely to state they felt increasing the “pay next day” charge and extending the payment deadline would have a moderate or major effect on achieving the aims (47 per cent and 48 per cent respectively).

However, local business owners were less likely to feel extending the payment deadline would have a moderate or major effect (38 per cent), with 38 per cent also saying it would have no effect in achieve the aims.

Figure 3.7 How effective is increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days in achieving our aims?



Other statistically significant differences between sub-groups:

There was a correlation between the frequency of driving in the area and the extent to which respondents felt the increase and extension of the “pay next day” charge would have an effect on the aims. Of those who drive into the Congestion Charge zone every day, 36 per cent stated that the changes would have a major effect, compared to 20 per cent of those that drive in at least once a month

3.8.2 Issues commonly raised

Overall, 1 per cent of respondents gave comments on the effectiveness of increasing the pay next day charge to £17.50 and extending the deadline for making payment to three days and they generally felt there should be no extra charge for not paying on the same day, the charge level should remain at £15 and not increase to £17.50.

3.9 Effectiveness of no discount for payments made by Auto Pay or Fleet Auto Pay

3.9.1 Overall summary

Just over a third (36 per cent) of respondents who gave a response to the question felt that having no discounts for payments made by Auto Pay or Fleet Auto Pay would have a moderate or major effect on achieving the aims, whilst 33 per cent thought the charges would have no effect on achieving the aims.

Table 3.8 How effective is having no discount for payments made by Auto Pay or Fleet Auto Pay? (%)

	All responses	Public	Stakeholder *
No effect	33	32	40
Minor effect	17	16	33
Moderate effect	16	16	14
Major effect	20	20	14
Don't know	15	15	0
Total	8466	8426	43

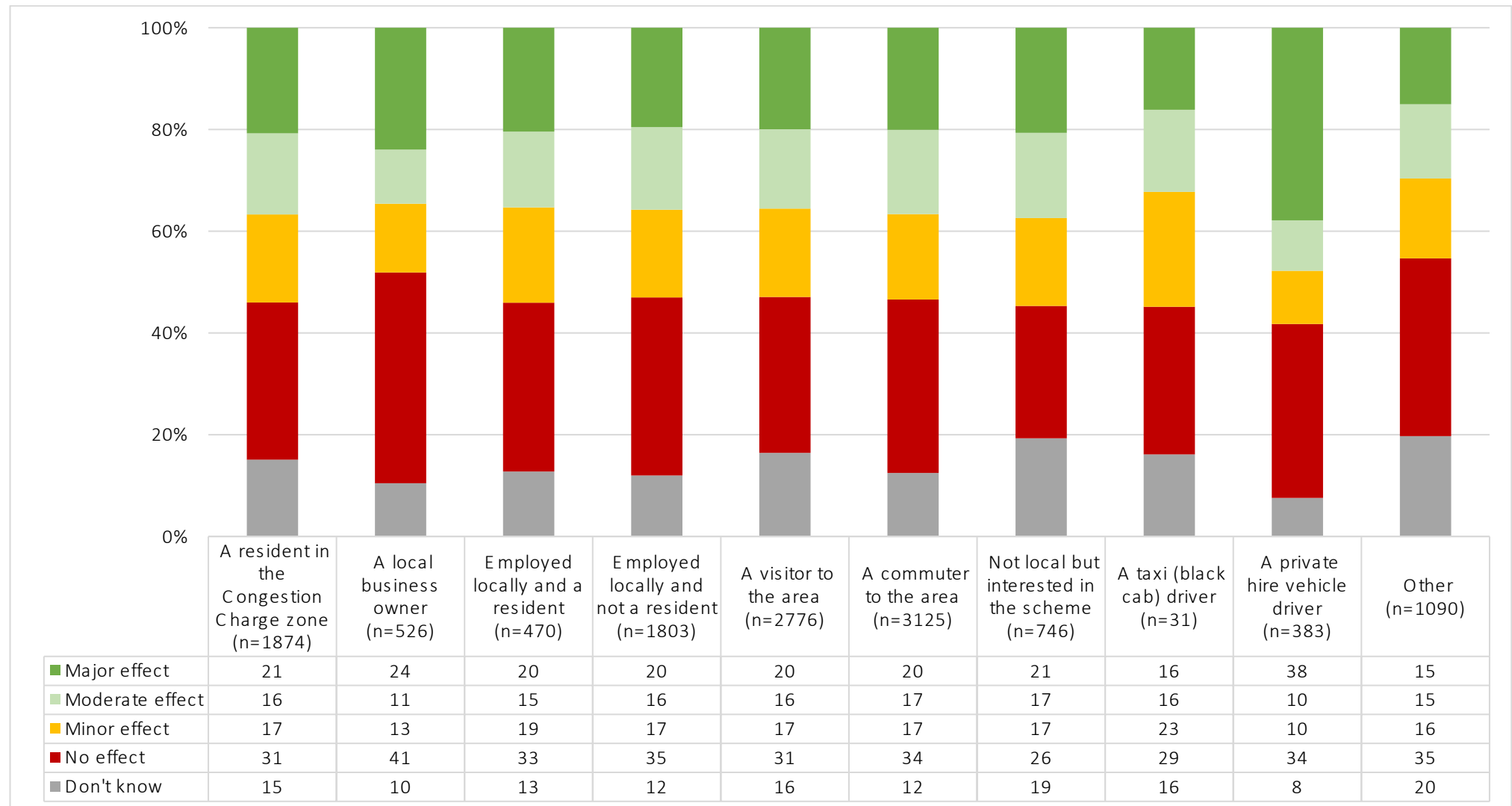
Base: all respondents (1162 public; 49 stakeholders; 1214 total did not answer this question)

*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Private hire vehicle drivers were most likely to state they felt that no discounts for Auto Pay or Fleet Auto Pay would have moderate or major effects on achieving the aims (48 per cent).

Local business owners were most likely to state it would have little or no effect on the aims with 55 per cent.

Figure 3.8 How effective is having no discount for payments made by Auto Pay or Fleet Auto Paying achieving the aims?



Other statistically significant differences between sub-groups:

There was a correlation between the frequency of driving in the area and the extent to which respondents felt no discounts for Auto Pay would have an effect on the aims. Those who travel more frequently during the week are more likely to feel the change would have a moderate or major effect, with 44 per cent of those who drive into the Congestion Charge zone everyday compared to 33 per cent travelling in just 1-2 days a week

3.9.2 Issues commonly raised

Overall, 3 per cent of respondents who gave a comment mentioned how effective having no discounts for payments made by Auto Pay or Fleet Auto Pay would be in achieving the aims. Those employed locally and living in the area, those employed locally and not living in the area and private hire vehicle drivers were the most likely to comment on the Auto Pay discounts. There was no consensus among respondents with some believing the £1 discount should be kept in place with others arguing it had no real effect. The most common comment was that having a small discount for Auto Pay encourages its uptake and would be slightly beneficial to the London economy

“Auto pay, and the discount for such payment, should be restored as these are vehicles/people which have to travel in London on a regular basis. They should not be penalised for bringing economic benefit to the capital” (Commuter)

“I believe Auto Pay scheme to be very useful and I appreciate the discount it offers. As a driver I am already discouraged to drive into the city unless I really need to by congestion charging, so taking away the discount seems like a strange decision.” (Employed Locally)

“There needs to a cap on how much private hire vehicle drivers pay per week, and the Auto Pay discount needs to be reinstated ASAP. Sorry, but putting the cart before the horse isn’t a way of running traffic policy in London, and drivers are not the only source of income” (Employed Locally)

3.10 Importance of reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London

3.10.1 Overall summary

Thirteen per cent of respondents felt it was not important to have reimbursement arrangements. All other respondents with an opinion considered it was important on a range from slightly important to very important.

Table 3.9 How important is it to you that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London? (%)

	All responses	Public	Stakeholder *
Very important	50	50	45
Fairly important	14	14	11
Important	12	12	23
Slightly important	8	8	0
Not at all important	13	13	9
No opinion	3	3	11
Total	8567	8523	44

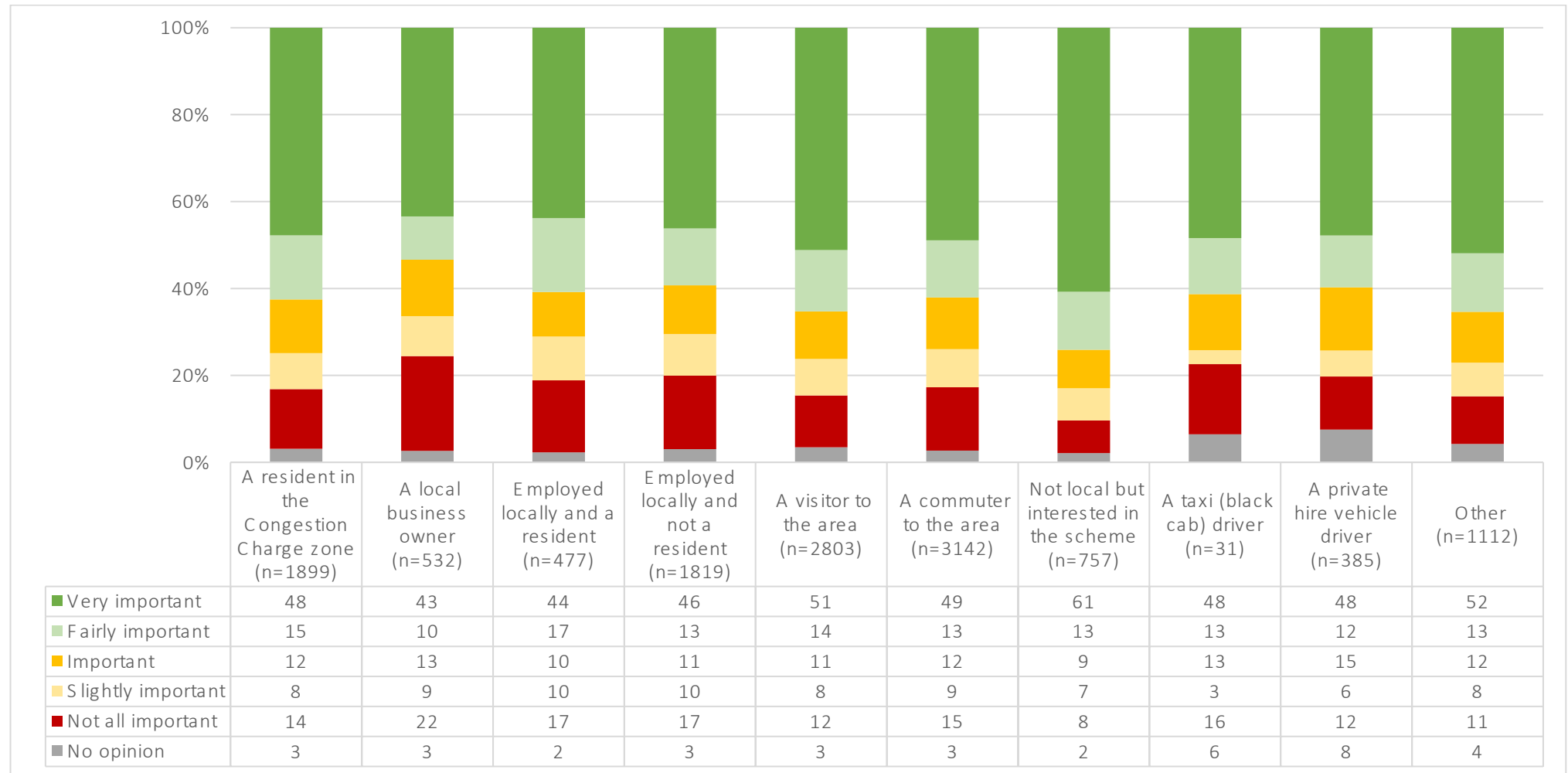
Base: all respondents (1065 public; 48 stakeholders; 1113 total did not answer this question)

*Only includes 44 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Visitors to the area, and particularly those interested in the scheme but not local, were most likely to state they felt that reimbursement arrangements were very or fairly important (65 per cent and 74 per cent respectively).

Local business owners were less likely to feel that reimbursement arrangements were very or fairly important, with 22 per cent saying they were not at all important.

Figure 3.9 How important is it to you that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London?



Other statistically significant differences between sub-groups:

- Women were more likely to think reimbursement arrangements were fairly or very important (72 per cent) compared to men (63 per cent). Men were also more likely (13 per cent) to think it was not at all important compared to 7 per cent of women
- There was a correlation between age and how important respondents thought the reimbursement arrangements were, with the older respondents being more likely to feel they are fairly or very important. 70 per cent of 60–70-year-olds and 72 per cent of 71+ year olds think it is fairly or very important compared to 62 per cent of 26–59-year-olds

3.10.2 Issues commonly raised

Overall, 3 per cent of respondents gave a comment that mentioned reimbursing arrangements for **NHS staff and patients**. Comments included:

- **Should be no reimbursement for NHS staff (or patients) (1 per cent):** Respondents felt there is no need to reimburse NHS staff as this was felt to be the incentivisation of driving rather than using public transport

“I do not agree with maintaining the extended reimbursement scheme for NHS staff. Staff should not be encouraged to drive to work. This is bad for the environment and congestion” (Employed Locally)

“I think enabling NHS staff/care home staff working in a Congestion Charge zone to receive reimbursements might be a misguided policy. It should be up to their employers to reimburse them for costs incurred in the carrying out of their work-related duties, not TfL” (Employed Locally)

“I think NHS should get public transport where possible so would not advocate reimbursement” (Resident)

- **NHS staff or patient reimbursement should apply in general (2 per cent):** Respondents suggested that NHS staff should be exempt from the charge and not have to pay the charge in the first place, along with comments that the reimbursement is essential for those staff travelling through the Congestion Charge to work

“NHS staff shouldn't have to pay congestion fees while providing a clinical service to patients regardless of if there is a pandemic. They are providing a service to vulnerable residents” (Commuter)

“Working for the NHS (and) having my congestion paid for this last year has massively helped with my anxieties during a pandemic. Please keep reimbursing the NHS and other key workers for their congestion fees” (Employed Locally)

Some respondents referred to the complicated process for carers or vulnerable patients trying to apply for reimbursements, highlighting the additional financial stresses added when travelling into hospital and that public transport is not a practical option when transporting patients to hospital

“...I would like to ask that patients who are required to use London hospitals for their treatment be exempt, my husband was diagnosed with cancer last year and has to attend Guy's hospital sometimes twice a week for scans and consultations, on top of the cost of driving in the Congestion Charge can cost us £30-£45 a week, especially as Guy's is just on the edge of the Congestion Charge zone. It is difficult to pay if like last year he was off sick and on minimal wages. So, the possibility of either a reduced charge or an exemption would really help” (Other)

"We believe that there is a strong case for the patient reimbursement arrangements to be extended beyond the conditions of a pandemic or epidemic. Many patients travelling for the purposes of healthcare – particularly within central London, where a significant number of specialist healthcare facilities (for example, cancer centres) are located – will be either immuno-suppressed and/or suffer from mobility problems that make it impossible to use public transport. Our view is that patients should, as standard, be exempted from the charge if their safety and health might be put at risk should they be unable to travel by road" (Employed Locally)

Overall, 8 per cent of respondents who gave a comment mentioned **other specific groups** that should or should not receive discounts. The main comments mentioned that the following groups should receive discounts:

- **Emergency service workers (1 per cent):** Respondents referred to discounts when commuting to work, especially as shift and commuting times do not make public or active transport practical

"Your proposal has NO CONSIDERATIONS for emergency service workers who have no choice but to come into work silly hours where public transport is not available" (Commuter)

"I don't believe reimbursements should be made for just NHS workers. I think this should be available for all emergency service members. Policemen and women and firemen and women are just as important to London being a safe, and functional place for residents to live" (Employed Locally)

- **Key workers (1 per cent):** Particularly those who work shifts or long hours should receive discounts, comments refer to the need for a discount / reimbursement after the pandemic

"...I think it's actually extortionate that I have to pay £15 to get into and out of London and pay for parking, at a time when you people are saying thank you too key workers yet you punish us the most. With charges and penalties" (Commuter)

"Key workers could be offered discounted or free public transport, bike hire (and maybe even discounted bike purchase) rather than encouraging them to drive by reimbursing the Congestion Charge (maybe a discount could be offered on the Congestion Charge instead)" (Resident)

"I think there should also be a discount/exemption of Congestion Charge for key workers living in London who need their car to commute to work" (Resident)

- **Disabled people (1 per cent):** Respondents highlighted the need for discounts as other transport options are limited and other comments mentioned there should be no charge at all and disabled people should be exempt rather than receiving discounts

"Only the people who actually need a car in order to get around, should be granted 90% to 100% discount, like people with disabilities and walking difficulties" (Commuter)

"One concern I have about the Congestion Charge is I feel that the disabled/elderly should have some kind of reduction or exemption. I work in the NHS and there are some groups who need to travel by car for physical reasons, e.g. wheelchair users, those at risk of falls, etc. I know that ableism is a huge problem in our society and deepening the financial divide experienced by many elderly and disabled would be disappointing and difficult" (Other)

"Taxi and private hire services such as Uber should be able to claim a lower rate of Congestion Charge when travelling with disabled passengers, and pass this saving onto disabled riders as part of their fare. Alternatively, disabled passengers should be able to claim back the cost of Congestion Charge built into their taxi / private hire fare from TfL directly" (Resident)

- **Those with informal family care arrangements (1 per cent):** Residents in the Congestion Charge zone (2 per cent) in particular, made comments there should be a discount for those with informal family care arrangements, comments highlight the expense of travelling throughout London to carry out responsibilities, such as looking after elderly relatives or taking children to school

“Residents’ discount is important. People shouldn’t be punished because of where they live. £15 to help out elderly family because I live in the Congestion Charge zone is unfair” (Resident)

“It is important to re-introduce the residents’ discount. Residents driving within the Congestion Charge zone are often undertaking necessary journeys - such as those involved with supporting elderly relatives. For example, I do not routinely drive to / from work, but use my car when going out of London - such as to drive to take my parents to medical appointments - they live in a rural area without a regular public transport network” (Resident)

- **Those on lower incomes / financially struggling (1 per cent):** Respondents addressed the financial burden that the proposed charge may have on lower income households, hindering opportunities and access in London. In addition, other respondents highlighted the disproportionate effect the charge could have on these households compared to residents / workers on higher incomes who may not perceive the charge to be a barrier, feeling that it would be easier for them to pay and continue driving within the Congestion Charge zone

“If you are low paid and you need the car for work you should not have to pay the same who are paid a high wage” (Commuter)

“My salary is quite low and I would struggle to pay for the Congestion Charge if this is going to be discussed as a matter for change. People are struggling as it is and my work is expected to double. This additional cost will be difficult for me to manage” (Other)

“The prices of £15 is way too high for most ordinary people. This makes it so the rich can drive where and when they want while poorer people cannot” (Other)

- **Other specified groups (2 per cent):** Shift workers, care workers, private healthcare workers, charity workers, pregnancy, young families, students, construction workers, religious practises all received suggestions they should be in receipt of a discount

“All essential low paid workers (e.g., cleaners, NHS, Carers, Police) and shift workers should receive exemptions or discounts. I am employed by Met Police and the Congestion Charge has penalised me being a shift worker as trains do not run early enough for me to start my 5:30am shift 7 days a week” (Employed Locally)

“As carers, domiciliary care workers, etc. are on a low income and work at anti-social hours, I think it is essential that it is essential that they are reimbursed” (Employed Locally)

“Discount for NHS: Don’t forget private/independent hospitals do about 50% NHS work. They seem to be excluded” (Commuter)

“There also should be a discount/ exemption considered for young families (with kids under 3 years old) who cannot move freely using London public transport due to severe problems with step free access for pushchairs and those who travel with babies” (Visitor)

“Please introduce reimbursement arrangements for students who need to collect and deliver heavy things within the CC area in connection with their education, and also for education staff” (Employed Locally)

- **New residents:** There were several respondents who felt new residents in the area should be allowed to apply for the residents' discount, which is currently closed. Respondents felt it was important to reinstate the residents' discount for new residents as it was unfair and penalising them just on the basis that they moved into the Congestion Charge zone after the temporary measures were introduced

"I am horrified at the idea that new residents in central London will not be able to apply for a discount. Very unfair" (Resident)

"Scrapping the residents' discount has made our life so tough! We moved here inside the Congestion Charge zone in September 2020, the month after you scrapped it, so practically we haven't been able to afford to have a car as £15 a day is too much. This was fine at the beginning, but we have a new baby (born August 2021) and being reliant on taxis for hospital, appointments, shopping etc has made things incredibly expensive and limiting. It's hard because we can see other people who have lived here longer use the car but it feels like we're being punished as new residents" (Resident)

"It is vital that residents are eligible for residents' discounts and application should be open to new residents. As it is, many residents have moved out of central London and not being eligible for residents' discount is a deterrent for people who are looking to move into central London" (Resident)

3.11 Further comments about the proposals

3.11.1 Introduction

Many of the comments received commented on the other impacts of the proposals, gave alternative suggestions to help reduce congestion or raised concerns about the changes.

3.11.2 Financial impact

Overall, a third of respondents who gave a comment mentioned the financial impacts of the new proposals. Local business owners, visitors to the area and those who are not local but interested in the scheme were the most likely raise issues about the financial impact of the proposals.

A detailed list of responses by respondent type can be found in Appendix A. The main concerns raised included:

- **Will have detrimental impact on businesses (9 per cent):** Local business owners (16 per cent), visitors to the area (12 per cent) and respondents who are not local but interested in the scheme (13 per cent) were most likely to feel the proposals would have detrimental impacts on businesses; the extended hours and weekend charging were felt to be particularly damaging

“There should be a better balance to encourage people to London. Businesses are suffering due to the greater restriction placed on entering London across too many areas. Having extended longer hours is not right” (Commuter)

“You must reduce the fee and reduce the hours of operations to help businesses in central London. You should encourage visitors into centre of town from about 6pm and all-day Saturday and Sunday, to encourage people back into theatres, museums, restaurants etc. The economy is in a dire situation, you have a duty to sustain thousands of jobs in town” (Visitor)

- **Small businesses (2 per cent) and the night-time Economy (6 per cent)** were identified as being particularly affected by the proposals and were sensitive to the higher charge
 - **Small business and self-employed** people (3 per cent) were thought to be particularly affected by the Congestion Charge and many of the comments referred to cost of receiving supplies as well as the impact of those whose business is based around driving such as tradesmen

“Increasing the daily charge is choking local small business. Removing the window on Sunday for example where we have a chance to bring in supplies is another loss for small business owners” (Local Business Owner)

“We have to carry out work on many occasions in the area, none of which can be done any other way. All cost incurred have to be passed on to all clients in the area. All are complaining bitterly regarding the additional costs, as it is increasing their operating costs. None of the work we carry out can be done any other way, other than on large HGV vehicles. Car traffic is the main problem in the area. HGV traffic is only for commercial use and should not incur charges of this magnitude in cost and restrictions of times which are currently in place. The revised times will make virtually no difference to the total charges we have to charge customers” (Local Business Owner)

“The current rates are too high and make life very difficult for small businesses like gardeners, builders, window cleaners etc. Large businesses and rich people won’t mind. The current policy is hitting Londoners hard” (Other)

- **Theatres / restaurants / nightlife (6 per cent):** These industries were thought to be already struggling due to the impact of Covid-19 and it was felt the proposed changes also impact on these types of business more than others

“Very keen to restore no Congestion Charge in evenings: London needs to attract people back into its theatres, concert halls, events. 6pm is a sensible time to remove the Congestion Charge” (Resident)

“The proposal to operate the charge at weekends will (continue to) be hugely detrimental to weekend trade in hospitality, retail and entertainment in London” (Local Business Owner)

“By keeping the Congestion Charge from 0700am till 2200pm you are killing the night life in central London; restaurants, theatres cinemas, concert venues, basically all aspects of night life” (A private hire vehicle driver)

- **Detrimental impacts on London’s economy (7 per cent):** Similarly, local business owners (13 per cent), visitors to the area (9 per cent) and respondents who are not local but interested in the scheme (8 per cent) who commented suggested the proposals would have a negative impact on London’s economy, again these related to reduced footfall/ business as well as increased business costs to deliver and receive goods. It was felt London is already vulnerable as it recovers from the Covid-19 pandemic

“The temporary expanded Congestion Charge times have been very damaging to the London economy, and significantly penalise Londoners living outside the Congestion Charge zone” (Resident)

“I strongly do not support any CC at weekends or on bank holidays because (a) the proposed hours of 12.00 to 18.00 are likely to directly conflict with travel times of those who prefer or have need to travel by car into the central zone for whatever purpose at weekends, whose expenditure whether in shops, theatres, cinemas, restaurants etc would directly support London’s economy...” (Other)

“I strongly disagree with the weekend charge remaining especially as it was only meant to be a temporary measure. I like to shop in central London at weekends and now I don’t because I don’t want to take public transport. Surely we should be encouraging shoppers to visit our ailing stores to kick start the economy?” (Visitor)

- **Will have detrimental impact on those struggling financially / on lower incomes (8 per cent):** Most of these respondents were concerned about how those on low incomes would be the hardest hit by the increased Congestion Charge, and that those who are poorest will be disproportionately affected by the Congestion Charge. Concerns were centred around the additional cost in travelling to and from work and travelling to visit friends and family

“I think the increased charge and Congestion Charge zone will have a terrible negative impact on those lower income workers who rely on their cars. It will increase consumer costs for builders, plumbers etc and cause endless logistical problems for working parents trying to take schoolchildren to different after school events” (Resident)

“The people that will be hit the hardest are the ones that work in the Congestion Charge zone (CCZ) will be the lowly paid workers that work inside the CCZ or have to commute through the CCZ to reach their employment and will face further costs to either travel through or around the CCZ. The wealthy residents that live in or nearby the CCZ can offset the extra costs and it will not encourage them to either walk, ride a bicycle and or use public transport...” (Visitor)

“...As always the proposed changes affects people living in inner London who are often working on minimum wages and trying to make ends meet. Many people inside

the Congestion Charge zone rely on driving to reach jobs, make essential trips such as food shopping and to pick up children, as well as people who need to drive into the Congestion Charge zone. I have friends and family who all can no longer visit family members inside the Congestion Charge zone due to the hours. This includes not being able to visit their elderly parents as it's unaffordable for normal citizens" (Employed Locally)

3.11.3 Social impact

Just under a fifth of respondents who gave a comment mentioned the social impacts of the new proposals. Residents, visitors, and commuters and those who are not local but interested in the scheme were the most likely to raise issues about the social impact of the proposals

A detailed list of responses by respondent type can be found in Appendix A. The main concerns raised included:

- **Will negatively impact on social and leisure activities (8 per cent):** Concerns were centred around the additional costs of travelling into London to shop, eat and to visit sites and several comments related to the increase in cost acting as a deterrent to family visits and socialising with friends and family in London, particularly at the weekends

"The Congestion Charge imposed over the weekend has destroyed much of the life of London since people can no longer drive in for leisure and pleasure. Businesses big and small are and will continue to suffer" (Other)

"The weekend and evening charges should be scrapped immediately. They are anti-social and damaging for residents who are no longer able to have freely visiting relatives and friends. It has cut off those living inside the Congestion Charge zone from people travelling to see them" (Resident)

"To extend Congestion Charge permanently into the weekend would seriously impact social events and retail/ hospitality in central London. This would also impact poorer income individuals coming into central London and is grossly inequitable" (Commuter)

An alternative view was that people choosing to drive into London at different times for shopping and leisure was identified as a potentially negative impact of the proposed Congestion Charge changes. Respondents raised concerns that the proposals would create more congestion outside of the Congestion Charge hours as people come into London in the evenings for leisure and socialising

"Reducing the hours of the Congestion Charge to 18:00 especially on weekends will encourage more people to drive into London for evenings out or use Ubers to / from work." (Employed Locally)

"...evening traffic had become a serious issue leading up to the pandemic, to the point that congestion within the Congestion Charge zone would be as bad (in some cases worse) outside the usual operating hours. The proposed changes will encourage people to return to their vehicles for leisure travel in central London, to drive in unnecessarily for evening leisure/entertainment, or to pass through from one side to another without concern for the negative impact it has on air quality, noise pollution, road safety and local residents..." (Resident)

- **Will negatively impact on faith groups (6 per cent):** Most respondents' comments referred to the proposed Sunday charges impacting congregations travelling to their place of worship. Many respondents felt it was unfair on those travelling to religious services. Comments referred to the difficulty of travelling on public transport for members of faith groups and how the proposed Congestion Charge hours and cost is a barrier for those wanting to practice their religion

"I feel like the Sunday charging will have a huge impact on the health and longevity of churches within the Congestion Charge zone. Charging on Sundays will make it very

difficult for many church members to make it to their churches which are inside the Congestion Charge zone. Particularly those who are younger with young children. Sunday charging has the potential to drive people and families out of faith communities within central London and could lead to many churches having to close due to lack of funding from members” (Employed Locally)

“The timings at weekends should be altered to allow people to travel to places of worship by car. Most services are in the morning and starting the charge at 12pm would mean they risk being charged as they travel home. Start it at 2pm perhaps. For many elderly people, driving to place of worship is vital in being part of a community” (Visitor)

- **Will negatively impact on vulnerable people (5 per cent):** These respondents were concerned that those who are vulnerable and rely on cars to drive will be disproportionately affected compared to those who are able to use public transport and avoid the Congestion Charge

“These proposals are discriminatory against people who managing conditions which make walking or cycling impossible for any distance and also those who are vulnerable for using public transport either from long term Covid security or the distance to walk to bus stops or stations. This is extremely serious for the 1000's of people who are not registered disabled” (Commuter)

“The proposals also discriminate against elderly and vulnerable people living within the Congestion Charge zone as many feel isolated due to family members and friends not being able to afford to visit” (Resident)

“Lots of people currently feel very uncomfortable on public transport given the pandemic, particularly those who are vulnerable but not eligible for exemptions to the charge e.g. pregnant women. I think it's a disgrace that these people are effectively penalised against because they aren't comfortable compromising their safety on public transport” (Commuter)

The elderly and disabled were also identified separately as being particularly affected by the proposals and were sensitive to the changes:

- **Elderly (5 per cent):** Concerns were raised about those unable to drive and the pressures the charge places on those visiting the elderly, potentially resulting in isolation and loneliness

“You have not thought about the elderly residents who have isolated and been alone for 18 months they want family and friends to visit in the weekends as before but now you have extended this” (Commuter)

“Complete removal of the charge at the weekend. My elderly parents who live within the Congestion Charge and have done so for many years prior to its creation have been isolated from friends and family. They would often get visitors at the weekend who would pass by for a visit but since the introduction of the weekend charge these visits have ceased leaving them feeling isolated and is have a detrimental effect on their mental health.” (Resident)

“I feel that the proposed new timing for the charges on Sundays will continue to have a negative impact in particular on elderly people who have been deprived of social contact with local places of worship which is vital to their wellbeing. Many of them are unable to use public transport and are brought into the area by car by their families or friends” (Other)

- **Disabled (2 per cent):** In particular, respondents were concerned with the costs imposed on disabled people who are dependent on a vehicle to go about daily activities

"My key challenge with maintaining a higher Congestion Charge and maintaining its operation over the weekend is that it penalises disabled people such as myself, who are the most dependent on travelling on the road via taxi / private hire services. No consideration has been given to the impact on our quality of life" (Resident)

"I am disabled and you have made it impossible for my family to deliver me fresh meals daily, you have made it almost impossible for me to use my car to get around" (Other)

"...I would also point out that disabled and many elderly people with less mobility than younger citizens do not benefit from improvements for cyclists and walkers. Failing to restore levy-free vehicle access to the centre of London outside the working week risks disadvantaging those groups further" (Other)

3.11.4 Alternative mitigating suggestions

Just under a fifth of respondents who gave a comment suggested alternative suggestions to help tackle congestion:

- **Needs to be more encouragement / investment in public transport (6 per cent):** Those who are not local but interested in the scheme (8 per cent), commuters (8 per cent), and visitors (7 per cent) referred to the need for improved public transport. Comments related to the need for investment to provide reliable, frequent, easily accessible, affordable and safe modes of public transport in and around London. Comments also suggested the need for incentives to encourage the use of public transport to become more sustainable

"Maybe instead of a residents' discount for Congestion Charge, think about an incentive or discount for using public transport instead. Incentivise away from car usage" (Local Business Owner)

"Cleanliness, reliability and safety still needs to be improved on public transport, this more than anything else would encourage users out of their cars" (Commuter)

"Put a package in place that is attractive to transfer people onto public transport from cars which includes feeling safe during travel, punctual times, cost, and converting to use hydrogen, rather than punitive measures" (A private hire vehicle driver)

"TFL should run all public transport 24hrs, make fares fair and cheaper and run public surveys to get the root cause of why people drive to Central London and provide solutions to the root cause. Tube and trains at their best and during rush hour is an endurance game and not everybody can withstand it, especially for families with small or school aged children, people less able to walk or get to tube etc. A bus can only take 2 prams max and if it is full none at all" (Commuter)

- **Needs to be more encouragement / investment in active travel (3 per cent):** Comments related to the need for improved cycle and walking infrastructure, for safer and more pleasant active travel journeys to provide people with the opportunity to travel sustainably in pedestrianised areas or on cycle lanes throughout London

"Focus on active transport - increase cycling and walking. Look to the Dutch cities. Focus on integrated transport systems" (Resident)

"We need more cycle lanes, more cycle parking ... improved infrastructure for active travel. Promote active travel above all other forms" (Resident)

"The roads especially the cycle lanes are not safe to use and full of debris. When we do use the cycle lanes, we are constantly worried we might get a puncture. TFL and the councils need to ensure the cycle lanes are clean from debris" (Employed Locally)

"These proposals will not have much impact on increasing walking and cycling. TfL needs to drastically increase the amount of protected cycle lanes everywhere and improve the ability of pedestrians to cross the street quickly and safely without fear of being run over" (Resident)

Although there are comments regarding the need to improve investment and encouragement in active travel, there were also comments regarding the need for enforcement of cyclists. Comments refer to the danger of cyclists on pavements and the need for segregated cycle facilities, along with the need to have regulations and controls over cyclists as other road users are subject to

"I am frightened of walking on pavements because there are so many cyclists on them now. I would like to walk more but I use my car because it isn't safe on the pavement" (Not local but interested in the scheme)

"...Would be nice if cyclists would actually abide by the highway code like any other vehicle. E.g. Not running red lights, wait on zebra crossings, pull out without looking behind them, riding on pedestrian pavements. This would thus minimise the risk of accidents for cyclists, motorists, and pedestrians" (Employed Locally)

- **Other suggestions to reduce congestion/pollution (5 per cent):** Local business owners (7 per cent) and residents (6 per cent) were most likely to make comments suggesting various other activities to reduce congestion and/or pollution. Frequent suggestions included:

- More encouragement and investment in low carbon transport/electric vehicles and charging points

"Bring full electric buses" (Other)

"Incentives to upgrade to cleaner vehicles should be incorporated into rates set for commercial users of the Congestion Charge zone" (Local Business Owner)

"Would suggest increasing the number of electric charging points and further incentivising the switch to electric cars for those living in the Congestion Charge zone. Currently there are not enough charging points, and this puts people off" (Resident)

- Banning or further restricting vehicles from entering the city, with some commenting about all vehicles but others focusing on HGVs or limiting delivery vehicles to specified periods

"If you want to reduce pollution ban all cars with diesel engines and all others beyond certain age! They are the ones creating pollution" (Visitor)

"Should look at having no HGV lorries in Central London between 7am till 10pm. This reduces traffic and also traffic pollution. This program is running in some parts of the GCC and works very well" (Visitor)

- Charging/fining people who park but leave their vehicle idling, with some believing this significantly contributes to air pollution

"The biggest polluters are the many trucks and delivery vans that enter London and leave their engines idling" (Resident)

"Drivers [should be] banned from idling when parked" (Other)

"Come down hard on motorists parking leaving their engines running - I have never seen enforcement despite there being Clean air zones. People sit on parking bays

thinking they won't get a parking ticket if the engine runs outside my house. Give them parking ticket and TFL enforce idling engines with a fine" (Other)

3.11.5 Other comments

Other comments received included:

- **Other traffic measures cause congestion not volume of traffic (7 per cent):** Some local business owners (13 per cent), private hire vehicle drivers (9 per cent) and residents living in the Congestion Charge zone (8 per cent) commented that congestion in the area was caused by other traffic measures. Comments included the implementation of cycle lanes, bus lanes, the closure of streets for pedestrianisation, reduced speed limits and the closure of several roads and bridges around London being the major cause of congestion, rather than the volume of traffic

"By closing down hundreds of streets, imposing 24-hour bus lanes, cycle lanes and other such restrictions, which is causing traffic to choke down frequently" (A private hire vehicle driver)

"Closing streets and reducing lanes has also have a negative impact and are causing more traffic and therefore pollution" (Commuter)

- **Public transport isn't a viable option for journey (4 per cent):** Comments were made about public transport not being a viable option for some respondents and/or for certain journeys, with this being shared by those employed locally (4 per cent of both those who are also a resident and those who are not) and commuters to the areas (4 per cent). Respondents discussed how public transport was not available at certain times they need to travel (e.g. those who work night shifts), or that they did not consider it to be a viable option to them due to health conditions or other circumstances

"Public transport is not an option for the shift times that I work (nor is it safe)" (Employed Locally)

"The extension of the charging hours, has a detrimental effect on night workers, who, dependent on their shifts and location, cannot get home on public transport, if they wanted to, so only option is to drive to work" (Employed Locally)

"I think the Congestion Charge is a punitive tax which unfairly penalises poor Londoners, and the disabled for whom buses, and the Tube may not be a viable option, either due to disability or unsociable working hours" (Commuter)

- **Proposals will not meet TfL's aims (3 per cent):** Some respondents felt that the Congestion Charge proposals would not meet the aims specified in the consultation materials. Some felt the proposals did not go far enough and would not sufficiently improve congestion and pollution levels, with some feeling the reduction in charging period may increase congestion levels

"It seems odd to reduce hours of operation when there are illegal levels of pollution in London. It appears to be totally contrary to your goals. They need to be kept extended and other measures introduced to reduce pollution levels" (Commuter)

"Retain the current hours, increase the Congestion Charge. Reducing the hours would be very counterproductive to the aims of decreasing road traffic and pollution" (Employed locally)

"These changes will hardly have an effect on your aims. If you truly aspired to reach your aims, you would make proposals that wholly discouraged vehicle use except for essential journeys or publicly available transport options" (Local Business Owner)

- **Congestion Charge is just another tax/money-making scheme (14 per cent):** Respondents referred to the Congestion Charge as a tax/ money-making scheme, private vehicle drivers (20 per cent) and local business owners (19 per cent) raised their discontent and belief that the Congestion Charge is just a money-making scheme

"It is utterly ridiculous to impose a Congestion Charge at weekends. This takes away important custom from shops that are already struggling. Just a money-making exercise with no real benefit" (Visitor)

"The proposals will make little or no difference to traffic levels and to the aims listed above. It merely taxes existing car use to raise funds to plug the shortfall created by the Mayor's disastrous management of public transport" (Other)

"This has been put in place purely as a money-making scheme and has nothing to do with it being better for the environment or reducing emissions etc. it's just passed off to look that way" (Employed Locally)

- **Criticism of TfL (10 per cent):** Criticism generally regarded TfL's aims to disincentivise driving, some respondents criticised how it was penalising drivers and those who can't rely on active travel or public transport, or criticism regarded TfL not doing enough to create more sustainable infrastructure in London

"Major changes need to come about in the management of TfL rather than punishing residents and businesses that depend on London's roads" (Commuter)

"This is a regressive and absurd tax that will substantially increase the cost of living in London. It will penalise the poorest workers who need their vehicles for work - for example, cleaners who have to transport their cleaning materials with them. TfL is the biggest creator of pollution in London. If proper planning and use of technology for managing traffic flows were used there would be far less pollution. TfL seems incapable of managing roads in London and responsibility should be transferred to an organisation incentivised to make traffic flow" (Local Business Owner)

"TfL continue to ignore the fact that a number of people have no choice but to drive into Central London. People for example like myself who need to transport heavy equipment are being unfairly penalised. I would rather use public transport, but the nature of my job prohibits this. It is desperately unfair" (Resident)

- **Criticism of the Mayor (8 per cent):** Comments included criticism that the Mayor has gone back on his promises during the election and is jeopardizing London's economy by restricting those who can travel into London

"If the Mayor of London wants to get London back to a thriving cultural venue for Londoners, he seriously needs to make driving easier until public transport is much better" (Employed Locally)

"It's appalling at Sadiq Khan ran for election on a promise not to increase the Congestion Charge, and that changes to charging hours and cost were made in response to the pandemic, and he has now backtracked and is seeking to make these changes permanent" (Commuter)

"The mayor told us it will be temporary. He is breaking his own words. Let the Congestion Charge return to £11.50 as it was and weekends remain free. This will help the economy of London businesses to recover" (A private hire vehicle driver)

4. Comments on the consultation process and material

4.1.1 Summary

Respondents rated the quality of website accessibility highest, with 77 per cent considering it to be adequate, good, or very good. Over two-thirds of respondents rated the quality of the consultation to be adequate, good, or very good in terms of written information (69 per cent) and website structure and ease of finding what they needed (72 per cent), with 24 per cent rating these components as poor or very poor. There were mixed opinions about the online survey format, with 66 per cent rating it as adequate, good, or very good but 32 per cent rating it as poor or very poor.

Table 4.1 What do you think about the quality of this consultation? (%)

Component of consultation	Very good	Good	Adequate	Poor	Very poor	N/A
Website structure & ease of finding what you needed	11	25	36	11	13	5
Written information	9	25	35	12	12	7
Maps, images & related diagrams	6	19	28	9	9	29
Online survey format	9	24	33	15	17	3
Website accessibility	11	31	35	7	8	9
Promotional material	5	15	29	10	12	30

Base: Website 8469, Written info 8370, Maps 8297, Online survey 8403, Website accessibility 8351, Promotional material 8227

4.1.2 Issues commonly raised

Many of those who responded to the open question about the quality of the consultation materials commented about the consultation questions themselves, including their clarity, wording and phrasing, and ability to respond to them. Comments were also received about the general design and presentation of the survey as well as accessibility for participating in the survey.

The main four issues raised in the open question were:

- **Issues with the questions - leading (9 per cent):** 9 per cent of respondents who commented on the materials mentioned how they felt the consultation questions were leading and biased, with some believing that the decision to implement the proposed changes had already been made by TfL and/or the Mayor and that the consultation was a “tick box exercise” that will have no impact on the proposals

“The document has clearly been designed to achieve a desired outcome. This is a cynical approach which reinforces the idea that there is no real desire to find out what people think - just a desire to provide cover for what those in positions of authority have already decided is in everybody else's best interests” (Employed Locally)

“I think the questions are framed in an extremely biased way. You aren't asking whether or not people agree with the changes, you're asking if people think that they will help you achieve a goal that not everyone believes is beneficial” (Commuter)

"The questions are biased towards allowing the mayor to do what he pleases. It is a meaningless tick box exercise. Respondents have not been given an opportunity to express their opinion in a meaningful way" (Commuter)

- **Issues with questions / information - complicated or unclear (9 per cent):** Those who felt the questions and/or information in the consultation materials was complicated or unclear commented about how they were unsure how to answer some of the questions because of this, particularly with questions that ask about effect as some respondents discussed how a major effect could be either positive or negative but felt they could not easily convey this in their response. Some respondents commented more specifically about how they felt that some questions were "open to interpretation" and felt that two people could hold the same views but provide different responses due to the wording of the survey questions and response options

"Honestly, the way the questions were written were kind of confusing. I wasn't sure what they were asking me. For example, I wanted to say that these proposals are bad, but because they don't do enough, rather than they're bad because they exist" (Commuter)

"I'm not sure the questions were framed very well - tricky to work out how to respond to some" (Commuter)

"Some of the wording is ambiguous e.g. a major effect could be a positive major effect or a negative major effect" (Resident)

- **Poor quality / design / presentation (5 per cent):** Those who provided these comment of the consultation process and materials commented about how they felt the general overall quality and design of the survey to be poor, such as the structure of the survey or the amount of text displayed on each page when completing the survey. Some respondents felt that the survey design and structure was "overly simplistic", whereas others commented about how they felt the survey was "text-heavy" and would have benefited from more graphics to demonstrate the proposed changes and information

"I found the structure of the survey overly simplistic for such a complex issue and some of the questions open to interpretation" (Other)

"The webpage is very text-heavy, so an infographic would have been useful to represent the changes" (Commuter)

"This survey is not very clear and poorly structured" (Commuter)

- **Issues with questions - no way to indicate support or opposition (4 per cent):** Some respondents commented about how they felt there was no way for them to indicate whether they support or oppose the proposed changes to the Congestion Charge or whether they support or oppose the Congestion Charge more generally. Whilst some felt that this was a mistake in the design of the survey, others felt that it was an intentional decision to restrict criticism of the Congestion Charge itself

"You haven't asked questions that will tell you what people really think of the Congestion Charge zone. It seems like you have tailored questions to suit justifying the Congestion Charge zone" (Employed Locally)

"Disappointed in the survey format. This is clearly designed to avoid tabulating negative responses. There is no option to vote against the proposals, which suggests that opposition will be ignored" (Commuter)

*"You don't ask whether we support or oppose specific measures. It is written in such a way that it assumes that we agree with the proposed changes, and only ask how much *effect* they have. This is a guided question, which is unwise" (Commuter)*

In addition to the main four issues raised by respondents, some commented about difficulties they experienced when trying to access the consultation or disagreed with the need to register online to access the consultation:

- **Consultation was difficult to access (2 per cent):** Some respondents commented about how they felt the consultation was difficult to access, sharing how the online platform had crashed and required them to try another time to complete the survey. Some specifically commented about how they had issues accessing the survey from their mobile device

“The website crashed several times. Many people will have been put off by this and their voices will not be heard” (Local Business Owner)

“Survey did not load well and needed to try three different browsers. Continue button on page one does not work. Needed to hit enter in order to proceed” (Resident)

“Couldn’t access the site on my phone so had to switch to laptop” (Local Business Owner)

- **Oppose the need to register to access the consultation (1 per cent):** Some respondents explained how they opposed the need for people to register on the online platform before being able to access the survey. Of those who commented about this, some shared how they felt it was not common practice for online consultations, and others felt it was “unnecessary” and could have been a “barrier” that prevented some from completing the survey

“Registration seems like an unnecessary step” (Local Business Owner)

“Having to create an account in order to do the survey is a big barrier for many and not common practice for online consultations” (Employed Locally)

“Having to register is a significant barrier to providing feedback” (Commuter)

Appendix A – Data tables

Code	Charge Level	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
1	Support/agree with the proposed charge level (£15)	6	7	178	2	184	2
2	Charge should be higher (general comments)	2	2	192	3	194	3
3	Charge should be higher for weekdays (Monday - Friday)	0	0	15	0	15	0
4	Charge should be higher for weekends (Saturday and Sunday)	0	0	1	0	1	0
6	Charge should be higher during peak/rush hours	0	0	2	0	2	0
7	Charge should be higher for other specified periods	0	0	4	0	4	0
20	Charge should return to pre-pandemic levels (£11.50)	12	13	542	7	554	7
21	Charge should be lower/oppose the proposed charge level (£15) (general comments)	2	2	615	8	617	8
22	Charge should be lower for weekdays (Monday - Friday)	0	0	6	0	6	0
23	Charge should be lower for weekends (Saturday and Sunday)	0	0	29	0	29	0
24	Charge should be lower on Sundays only	0	0	5	0	5	0
25	Charge should be lower during peak/rush hours	0	0	1	0	1	0
26	Charge should be lower for other specified periods	0	0	16	0	16	0

Code	Charges - Vehicle Types	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
40	Support taxis (black cabs) not being charged/being exempt from charges	1	1	19	0	20	0
41	Oppose taxis (black cabs) not being charged/should not be exempt from charges	0	0	37	0	37	0
42	Support PHVs being charged/should not be exempt from charges	1	1	18	0	19	0
43	Oppose PHVs being charged/should be exempt from charges	0	0	84	1	84	1
44	PHVs should be charged more/higher amount	0	0	8	0	8	0
45	PHVs should be charged less/lower amount	0	0	16	0	16	0
46	Taxis/PHVs (cannot determine which) should not be charged/should be exempt from charges	0	0	22	0	22	0
47	Taxis/PHVs (cannot determine which) should be charged/should not be exempt from charges	0	0	22	0	22	0
48	Taxis/PHVs (cannot determine which) should be charged more/higher amount	0	0	9	0	9	0
49	Taxis/PHVs (cannot determine which) should be charged less/lower amount	0	0	7	0	7	0
50	Delivery/freight/servicing vehicles should not be charged/should be exempt from charges	3	3	38	0	41	1

51	Delivery/freight/servicing vehicles should be charged more/higher amount	0	0	37	0	37	0
52	Delivery/freight/servicing vehicles should be charged less/lower amount	1	1	12	0	13	0
53	Support/agree with battery electric vehicles/hydrogen fuel cell vehicles not being charged/being exempt from charges	2	2	99	1	101	1
54	Oppose/disagree with battery electric vehicles/hydrogen fuel cell vehicles not being charged/being exempt from charges	0	0	20	0	20	0
55	Should be no charge/exemptions for other specified vehicle types	5	6	69	1	74	1
56	Charges should be higher for other specified vehicle types	1	1	114	1	115	1
57	Charges should be lower for other specified vehicle types	0	0	60	1	60	1

Code	Auto Pay and Pay Next Day	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
70	Should be a discount for Autopay / Fleet auto pay users	13	15	192	3	205	3
71	Support having no Autopay discount	3	3	37	0	40	1
80	Should reduce time to pay (e.g. within 24 hours)	0	0	8	0	8	0
81	Should extend time to pay (e.g. greater than 3 days)	0	0	42	1	42	1
82	Should be no extra charge for not paying on the same day	0	0	94	1	94	1
83	Support increase in charge when paying up to three days later (£17.50)	3	3	40	1	43	1
84	Support extending the time to pay to three days	2	2	33	0	35	0
85	Suggest increasing the charge for not paying on the same day (e.g. £20)	1	1	10	0	11	0

Code	Zoning and Charging Period	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
100	Should extend the Congestion Charge zone/increase the boundary	3	3	118	2	121	2
101	The Congestion Charge zone should align the zone for the ULEZ expansion (planned for Oct 2021)	0	0	6	0	6	0
102	Should reduce the size/boundary of the Congestion Charge zone	0	0	30	0	30	0
103	Proposed changes should be implemented sooner	0	0	82	1	82	1
104	Proposed changes should be delayed	1	1	22	0	23	0
105	Should have a way to check if you've been inside the zone/when you need to pay	0	0	70	1	70	1
120	Do not support new charging period/hours (general comment)	1	1	127	2	128	2
121	Support the new charging period/hours (general comment)	3	3	170	2	173	2
123	Support changes to include charge on Bank Holidays	1	1	16	0	17	0
124	Support Christmas Day to New Year Day (inclusive) charge-free period	1	1	130	2	131	2
125	Oppose changes to include charge on Bank Holidays	6	7	495	6	501	6
126	Oppose Christmas Day to New Year Day (inclusive) charge-free period	0	0	15	0	15	0
127	Should be no charge for weekdays (Monday - Friday)	0	0	10	0	10	0

128	Should be no charge for weekends (Saturday and Sunday)	18	20	2456	32	2474	32
129	Should be no charge for Sundays	8	9	400	5	408	5
130	Should be no charge for other specified periods	0	0	26	0	26	0
131	Charging period/hours should replicate those used through the temporary changes	10	11	334	4	344	4
132	Charging period/hours for Mon-Fri should replicate those used through the temporary changes	0	0	79	1	79	1
133	Charging period/hours for Mon-Fri should return to pre-pandemic (ie 0700-1800)	12	13	1413	19	1425	18
134	Charging period/hours for Sat-Sun should replicate those used through the temporary changes	0	0	26	0	26	0
135	Charging period should apply 24/7/all the time	1	1	98	1	99	1
136	Charging period/hours should be extended (general comments)	1	1	96	1	97	1
137	Charging period/hours should be reduced (general comments)	0	0	220	3	220	3
138	Charging period/hours should be extended during weekends to be the same as weekdays	0	0	20	0	20	0
139	Other specific time changes suggested (that do not fit into above)	11	12	365	5	376	5

Code	Discounts and Reimbursements	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
140	Support/agree with the residents' discount	15	17	820	11	835	11
141	Should not be a residents' discount	4	4	173	2	177	2
142	Residents' discount should be higher	0	0	102	1	102	1
143	Residents' discount should be lower	3	3	83	1	86	1
144	Boundary should be extended for residents' discount/unfair to those located just outside	0	0	73	1	73	1
145	Other specific changes suggested to residents' discount	1	1	148	2	149	2
146	Oppose the removal of online and app resident pre-payment	0	0	4	0	4	0
160	Should be no reimbursement for NHS staff	0	0	49	1	49	1
161	Should be no reimbursement for NHS patients	0	0	12	0	12	0
162	NHS staff reimbursement should apply in general	10	11	105	1	115	1
163	NHS patient reimbursement should apply in general	5	6	64	1	69	1
164	NHS staff/patients should be incentivised to use active travel modes or public transport	1	1	18	0	19	0
180	Should be no discounts for anyone	0	0	23	0	23	0
181	Support there being a discount for blue badge holders	1	1	80	1	81	1

182	Should be a discount for other disabled people (i.e. in addition to blue badge holders)	0	0	61	1	61	1
183	Should be a discount for elderly people	0	0	31	0	31	0
184	Should be a discount for vulnerable people (not specified whether referring to disabled or elderly people)	0	0	9	0	9	0
185	Should be a discount for those with informal family care arrangements	0	0	111	1	111	1
186	Should be a discount for vehicle sharing i.e. car / van sharing clubs	2	2	7	0	9	0
187	Should be a discount for emergency services workers (e.g. police)	0	0	44	1	44	1
188	Should be a discount for key workers	1	1	66	1	67	1
189	Should be a discount for my business	0	0	3	0	3	0
190	Should be a discount for smaller businesses	3	3	13	0	16	0
191	Should be a discount for businesses (general comments)	1	1	14	0	15	0
192	Should be a discount for those on lower incomes/financially struggling	3	3	108	1	111	1
193	Should be a discount for other specified users/groups	9	10	145	2	154	2

Code	Wider Impacts	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
210	Proposed changes will have no impact to congestion	6	7	459	6	465	6
211	Proposed changes will have a positive impact on congestion/will reduce it	0	0	43	1	43	1
212	Proposed changes will cause more congestion/increase it	11	12	456	6	467	6
213	Proposed changes will have no impact to air quality	0	0	153	2	153	2
214	Proposed changes will have a positive impact on air quality/will improve it	0	0	16	0	16	0
215	Proposed changes will make air quality/pollution worse	8	9	239	3	247	3
216	Proposed changes will have no impact to noise pollution	0	0	3	0	3	0
217	Proposed changes will have a positive impact on noise pollution/reduce it	0	0	2	0	2	0
218	Proposed changes will make noise pollution worse/create more noise	1	1	15	0	16	0
219	Proposed changes will have no impact to safety	0	0	20	0	20	0
220	Proposed changes will have a positive impact on safety issues/improve safety	0	0	6	0	6	0
221	Proposed changes will make safety issues worse	6	7	119	2	125	2
223	Will push people out of London/cause people to move away/relocate	0	0	8	0	8	0

222	Congestion Charge pushes congestion and pollution outside of the zone	0	0	18	0	18	0
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Code	Impact on society, active travel and public transport	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
230	Proposed changes will negatively impact active travel (walking, cycling)	6	7	102	1	108	1
231	Proposed changes will positively impact active travel (walking, cycling)	0	0	6	0	6	0
232	Proposed changes will negatively impact public transport	2	2	47	1	49	1
233	Proposed changes will positively impact public transport	0	0	3	0	3	0
240	Will have detrimental impact on theatres/restaurants/nightlife (e.g. West End)	7	8	464	6	471	6
241	Will have a detrimental impact on my business/livelihood	4	4	194	3	198	3
242	Will have a detrimental impact on small businesses	6	7	140	2	146	2
243	Will have detrimental impact on businesses (general comments)	20	22	719	9	739	10
244	Will have detrimental impact on London's economy	4	4	513	7	517	7
245	Will have detrimental impact on those struggling financial/on lower incomes (e.g. debt)	10	11	640	8	650	8
246	Congestion Charge costs will be/are being passed onto residents/customers from businesses/services	2	2	19	0	21	0

260	Proposed changes will have a positive impact on those with protected characteristics	0	0	11	0	11	0
261	Proposed changes will have a negative impact on those with protected characteristics	4	4	131	2	135	2
262	Will encourage people to drive at different times (e.g. evenings and weekends for shopping and leisure)	1	1	44	1	45	1
263	Will negatively impact on social/leisure activities	8	9	595	8	603	8
264	Will negatively impact on faith groups (e.g. travelling to church)	20	22	425	6	445	6
265	Will negatively impact disabled people	2	2	193	3	195	3
266	Will negatively impact elderly people	3	3	363	5	366	5
267	Will negatively impact vulnerable people (not specified whether referring to disabled or elderly people)	6	7	178	2	184	2

Code	Alternative mitigating suggestions and General Comments	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
280	Needs to be more enforcement of poor cyclist behaviour	0	0	132	2	132	2
281	Needs to be more encouragement/investment in public transport (e.g. cheaper, more frequent etc)	9	10	487	6	496	6
282	Needs to be more encouragement/investment in active travel (walking, cycling, infrastructure, pedestrianisation)	11	12	233	3	244	3
283	Other suggestions to reduce congestion/pollution	13	15	380	5	393	5
284	Need more parking areas/spaces	0	0	57	1	57	1
285	Need less parking areas/spaces	0	0	15	0	15	0
286	Make parking cheaper	0	0	39	1	39	1
287	Make parking more expensive	0	0	13	0	13	0
288	Request for TfL to explore wider road charging schemes	16	18	73	1	89	1
289	Should stop/limit commercial vehicles entering during the day	1	1	8	0	9	0
300	Support/agree with the proposed changes (general comment)	6	7	188	2	194	3
301	Oppose/disagree with the proposed changes (general comment)	5	6	290	4	295	4
302	Support/agree with the Congestion Charge scheme (general comment)	6	7	52	1	58	1

303	Oppose/disagree with the Congestion Charge scheme (general comment)	3	3	296	4	299	4
304	Unfair to penalise drivers (general comments)	2	2	377	5	379	5
305	Oppose proposed changes because of Covid-19 (e.g. feel safer driving, already financially struggling)	4	4	357	5	361	5
306	Support proposed changes because of Covid-19	0	0	10	0	10	0
307	Other traffic measures cause congestion not volume of traffic	6	7	563	7	569	7
308	Public transport isn't a viable option for journey	3	3	275	4	278	4
309	Proposals will not meet TfL's aims	11	12	212	3	223	3
310	Walking/cycling/active travel not a viable option for some	0	0	9	0	9	0

Code	Others	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
320	Congestion Charge is just another tax/money-making scheme	12	13	1058	14	1070	14
321	Criticism of the Mayor	4	4	607	8	611	8
322	Criticism of the Government	0	0	99	1	99	1
323	Criticism of TfL	5	6	800	10	805	10
324	Comment about existing ULEZ	6	7	180	2	186	2
325	Comment about ULEZ October expansion	3	3	87	1	90	1
328	Comments about Low Traffic Neighbourhoods (LTNs)	0	0	19	0	19	0
329	References/comparisons made to other cities/countries	1	1	8	0	9	0
400	Other (does not fit into codeframe)	1	1	162	2	163	2

Code	Quality of consultation	Stakeholder		Public		Total	
		Count	%	Count	%	Count	%
500	Issues with questions / information - complicated or unclear	2	15	734	31	736	31
501	Issues with questions - not possible to answer questions	0	0	54	2	54	2
502	Issues with the questions - irrelevant	0	0	115	5	115	5
503	Issues with the questions - leading	3	23	737	31	740	31
504	Issues with questions - No way to indicate support or opposition	0	0	350	15	350	15
505	Issues with questions - range of responses were limited	0	0	169	7	169	7
506	Issues with questions - Can't express which proposals would work best (e.g. don't ask opinions on certain aspects)	1	8	276	12	277	12
511	Inadequate space to provide detailed comments	0	0	54	2	54	2
512	No questions relating to the financial aspects of the proposals	1	8	38	2	39	2
513	Poor quality / design / presentation	2	15	382	16	384	16
514	Lack of data or evidence to support the proposals	5	38	100	4	105	4
515	No map of congestion zone	0	0	27	1	27	1
520	Consultation material not advertised or publicised enough	1	8	231	10	232	10
521	Consultation was difficult to access	0	0	123	5	123	5
522	Issues with registration to access consultation	0	0	35	1	35	1

523	Oppose the need to register to access the consultation	0	0	76	3	76	3
530	No issues /general positive comment	0	0	52	2	52	2
531	Other comment about the consultation / consultation material	0	0	85	4	85	4
532	Hope comments/feedback will be useful/listened to/considered/addressed	0	0	12	1	12	0
533	Concerns about whether consultation will fairly represent London's residents/should be further consultation	0	0	5	0	5	0

Appendix B - Questionnaire

New Congestion Charge proposals

Have Your Say Transport for London

New Congestion Charge proposals survey

Please share your views by taking part in our online survey. It should take you no more than 10 minutes to complete.

If you prefer not to complete the survey, then please submit your response to us in writing to:

- ccyourview@tfl.gov.uk or
- FREEPOST TFL HAVE YOUR SAY - Congestion Charge (no stamp needed)

Please note that responses to the survey will be made publicly available after the consultation has closed in the form of a report on the results. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

Our aims

Our aims are to reduce traffic and congestion in central London to help achieve the objectives of the Mayor's Transport Strategy (MTS), including:

- Reducing private car use in central London;
- Increasing trips made by walking, cycling or public transport;
- Improving journey times for essential traffic including emergency services, buses and freight;
- Helping to eliminate deaths and serious injuries from our roads;
- Improving air quality and reducing carbon emissions; and
- Creating vibrant and attractive open spaces

How important is it to you that we take steps to reduce traffic and congestion in central London?

(Choose any one option)

- ☐ Very important
- ☐ Fairly important
- ☐ Important
- ☐ Slightly important
- ☐ Not at all important
- ☐ No opinion

How important is it to you that we take steps to increase the number of people walking, cycling and using public transport in central London?

(Choose any one option)

- ☐ Very important
- ☐ Fairly important
- ☐ Important
- ☐ Slightly important
- ☐ Not at all important
- ☐ No opinion

New Congestion Charge proposals

Have Your Say Transport for London

Proposed changes

The Congestion Charge scheme is an important tool for managing traffic and congestion in central London. It has been kept under review to ensure it remains effective against this and to support delivery of the objectives of the Mayor's Transport Strategy. Last year we made temporary changes to the scheme, including operating it daily until 22:00.

We are now proposing changes to the level of charge, the hours and days of operation, discounts for residents living in the zone, the next day charge, Auto Pay discounts and reimbursements. For full details please see the consultation materials. If introduced, these proposed changes would come into effect later this year immediately following the decision to make them. The exception would be the proposed new charging hours and days, which would come into effect on 28 February 2022 to allow time to make changes to technology systems and on-street signage.

How effective do you consider the following proposed changes to the Congestion Charge scheme would be in achieving our aims set out above?

Questions	No effect	Minor effect	Moderate effect	Major effect	Don't know
Set the level of the Congestion Charge at £15.00 (Since June 2020, the charge level has been set at £15.00 as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Operate the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday). (This is the same as before the pandemic. Since June 2020, charging hours have been 07:00 to 22:00 on weekdays as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Operate the Congestion Charge on Saturday and Sunday and on bank holidays between 12:00 and 18:00 (but not in the period between 25 December and the New Year's Day bank holiday). (Since June 2020, charging hours have been 07:00 to 22:00 on Saturdays, Sundays and bank holidays (except Christmas Day), as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Reopen applications for the residents' discount of 90 per cent of the Congestion Charge. (Since August 2020 the residents' discount has been closed to new applications as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
Increase the "pay next day" charge to £17.50 and extend the deadline for making payment to three days. (Since June 2020, the charge has been set at £17.50 with three days for delayed payment as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					
No discount for payments made by Auto Pay or Fleet Auto Pay. (Since June 2020, no discount has been given for payments made by Auto Pay or Fleet Auto Pay as part of the temporary measures introduced in response to the transport challenges arising from the pandemic).					

How important is it to you that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London (existing reimbursement arrangements in other circumstances are proposed to continue)?

(Choose any one option)

- ☐ Very important
☐ Fairly important
☐ Important
☐ Slightly important
☐ Not all important
☐ No opinion

Do you have any further comments about the proposals? Please note which proposal(s) your comments are about.

New Congestion Charge proposals

Have Your Say Transport for London

If you have identified any positive or negative impacts in the previous question please let us know any suggestions to mitigate those negatives or enhance those positives. Please note which proposal(s) your comments are about.

Are you a resident in the Congestion Charge zone?

(Choose any one option)

- ☐ Yes
☐ No
☐ Don't know

Are you registered for a discount or exemption to the Congestion Charge or have you used a reimbursement arrangement?

(Choose any one option)

- ☐ Yes
☐ No
☐ Don't know

If relevant, please state the discount or exemption you are registered for or the reimbursement scheme you have used (please tick all that apply).

(Choose all that apply)

- ☐ Discount - residents (90%)
☐ Discount - Blue Badge holders
☐ Discount - accredited breakdown
☐ Discount - vehicles with 9+ seats
☐ Discount - cleaner electric and certain plug-in hybrid vehicles
☐ Discount - motor tricycles
☐ Discount - roadside recovery vehicles
☐ Exemption - two wheeled motorcycles and mopeds
☐ Exemption - emergency service vehicles (police, ambulance, lifeboat and fire service vehicles exempt from Vehicle Excise Duty)
☐ Exemption - NHS vehicles that are exempt from vehicle tax
☐ Exemption - vehicles used by disabled people that are exempt from vehicle tax
☐ Exemption - vehicles for more than one disabled person that are exempt from vehicle tax
☐ Exemption - designated wheelchair accessible PHVs licensed with TfL (when fulfilling a booking)
☐ Exemption - taxis licensed by TfL
☐ Exemption - HM Coastguard and Port Authorities vehicles
☐ Exemption - certain borough operational vehicles
☐ Exemption - armed forces vehicles
☐ Exemption - Royal Parks Agency and Crown Estate Paving Commission vehicles
☐ Reimbursement - an NHS patient
☐ Reimbursement - NHS staff
☐ Reimbursement - a local authority employee
☐ Reimbursement - a charity employee or volunteer
☐ Reimbursement - working at a care home within the Congestion Charge zone

Are you (please tick all that apply)?

(Choose all that apply)

- ☐ A resident in the Congestion Charge zone
☐ A local business owner
☐ Employed locally
☐ A visitor to the area

New Congestion Charge proposals

Have Your Say Transport for London

- ☐ A commuter to the area
- ☐ Not local but interested in the scheme
- ☐ A taxi (black cab) driver
- ☐ A private hire vehicle driver
- ☐ Other (please specify)

How often do you drive in the Congestion Charge zone?

(Choose any one option)

- ☐ Every day
- ☐ 5-6 days a week
- ☐ 3-4 days a week
- ☐ 1-2 days a week
- ☐ 1-3 times a month
- ☐ Less than once a month
- ☐ Never

Can you please confirm if you are responding as an individual or as an official representative of an organisation (e.g. interest group, charity or trade body).

(Choose any 1 options)

- ☐ As an individual
- ☐ As an official representative of an organisation

If you are responding as an official representative of an organisation then please provide your organisation name below.

How did you hear about this consultation (the main way you heard)?

(Choose any one option)

- ☐ Received an email from TfL
- ☐ Received a leaflet from TfL
- ☐ Read about it in the press
- ☐ Heard a radio advert about it
- ☐ Saw it on the TfL website
- ☐ Social media
- ☐ Other (please specify)

What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

Questions	Very good	Good	Adequate	Poor	Very poor	Not applicable
Website structure & ease of finding what you needed						
Written information						
Maps, images & related diagrams						
Online survey format						
Website accessibility						
Promotional material						

Do you have any further comments about the quality of the consultation materials?

Appendix F: List of stakeholders contacted

Appendix F: List of stakeholders contacted

A large database of stakeholders involving over 1,500 contacts were notified of the consultation in addition to publicity activities. This included:

All 33 London local authorities with notification to: Leaders, Chief Executives, Cabinet Leads, Councillors, Transport Leads and Communications Officers

Strategic London organisations: Greater London Authority, London Councils, London Fire Brigade, Metropolitan Police, London Ambulance Service

MPs

Abbott, Diane	Hodge, Margaret
Aiken, Nickie	Huq, Rupa
Ali, Rushanara	Jones, Sarah
Allin-Khan, Rosena	Lammy, David
Anderson, Fleur	Lopez, Julia
Bacon, Gareth	Malhotra, Seema
Begum, Apsana	McDonagh, Siobhain
Blackman, Bob	McDonnell, John
Brokenshire, James	Murray, James
Brown, Lyn	Neill, Bob
Buchan, Felicity	Offord, Matthew
Butler, Dawn	Olney, Sarah
Cadbury, Ruth	Oppong-Asare, Abena
Charalambous, Bambos	Osamor, Kate
Clark, Feryal	Pennycook, Matthew
Colburn, Elliot	Philp, Chris
Corbyn, Jeremy	Reed, Steve
Coyle, Neil	Reeves, Ellie
Creasy, Stella	Ribeiro-Addy, Bell
Cruddas, Jon	Rosindell, Andrew
Cryer, John	Scully, Paul
Daby, Janet	Sharma, Virendra
Davey, Ed	Siddiq, Tulip
de Cordova, Marsha	Simmonds, David
Duncan Smith, Iain	Slaughter, Andy
Efford, Clive	Starmer, Keir
Eshalomi, Florence	Stewart, Bob
Evennett, David	Streeting, Wes
Foxcroft, Vicky	Tarry, Sam
Freer, Mike	Thomas, Gareth
Gardiner, Barry	Thornberry, Emily
Hammond, Stephen	Timms, Stephen

Hands, Greg	Villiers, Theresa
Harman, Harriet	West, Catherine
Hayes, Helen	Wilson, Munira
Hillier, Meg	

Assembly members

Boff, Andrew	Garratt, Neil
Clarke, Anne	Rogers, Nicholas
Pidgeon, Caroline	Sahota, Onkar
Russell, Caroline	Fortune, Peter
Baker, Elly	Sheikh, Sakina
Best, Emma	Moema, Sem
Bokhari, Hina	Bailey, Shaun
McCartney, Joanne	Berry, Sian
Prince, Keith	Hall, Susan
Hirani, Krupesh	Devenish, Tony
Duvall, Len	Desai, Unmesh
Cooper, Leonie	Polanski, Zack
Ahmad, Marina	

Stakeholder organisations: Freight and motoring interests

AA	Innovate UK
Abacus Transtex	Institute of Couriers
Abel & Co	IRTE/SOE
ADM Mailing Ltd	ITM Power
Aerodyne Global Ltd	Iveco
Aggregate Industries	J Coffey Plant Ltd
Agility Free Solutions	Jay Transport
Air Liquide	John Lewis
ALD Automotive	Joint Research Centre
Allison Transmission UK	JouleVert
Anderson Grant	Keltbray
Angel Trains Ltd	Keolis
APC UK	KFC UKI
APP Web Plant Hire	Kilnbridge
APT Controls	Knights of Old
AS Watson (Health & Beauty UK Ltd)	KNK Group
ASDA Stores	Kuehne + Nagel
Association of Vehicle Recovery Operators	L Lynch Plant Hire & Haulage Ltd
Astra Vehicle Technologies	LDV

Atkins Global	Link Group
Axle Haulage Ltd	Logistics UK
BC Wiles and Son Ltd	London Calling
B2B Surge	London Chamber of Commerce and Industry
Babcock International	London First
Ballard	Low Carbon Vehicle Partnership
Barclays Asset Finance	Lyreco
Baxle Ltd	M A Ponsonby Ltd
BD Auto	Magtec
Bid Food	MAN
Biffa Waste Services	Marks & Spencer
Billingsgate Tenant	Martin Brower UK
Biocentre	McGrath Group
BLG	MCIA
BMM Energy Solutions LTD	McNicholas
BOC Fuels	Metropolitan Police
Bollore (Blueprint London)	Mineral Products Association
Borough Market	MITIE
BPF	ML Power Systems
BPR Group	MMAPP Haulage Contractors Ltd
BR Saunders	Mobile Mini
Brake	Morrisons
Brewery Logistics Group	Motorcycle Action Group
Brewing, Food & Beverage Industry Suppliers Association	Motorcycle Industry Association
British Beer and Pub Association	Muni-serv
British Gas	MWW Ltd
British Vehicle Rental and Leasing Association	National Franchised Dealers Association
BVRLA	National Grid
BYD	National Motorcycle Council
BYD UK	NHS
C40	Night Time Industries Association
Calor	Nomad Power
Canary Wharf Group	NRG Fleet Services Ltd
Carousel Logistics	Ocado
Cartwright Group	Octopus Energy Services Limited
CECA	O'Donovan Waste Disposal
Cemex	Organic Power / Biomethane Ltd
Cenex	Parcelforce
Central London Freight Quality Partnership	Parsons Brinkerhoff
Centre for Sustainable Road Freight	Pizza Express

Charge Engineering	PLA
ChargeMaster	Pod Point Ltd
CILT	Prestige Cars and Couriers
City Scaffolding	Pret a Manger
City Sprint	Professional Recovery Operators Federation
Clear Channel	Prohire
Clipper Logistics	RAC
Close Brothers Asset Finance	Recycled Materials Supplies
CNG Fuels	Reliagen Holdings Ltd
CNH Industrial	Renault
Co-operative Group	Reynolds
Cold Chain Federation	Restore Datashred
Commercial Group	Rexel
Commercial Vehicle Franchise for DAF Trucks - Greenhous DAF	RFG
CoMoUK	RHA
Confederation of British Industries	Riverford
Confederation of Passenger Transport	Road Haulage Association
Cool Van	Route Monkey
Cross River Partnership	Royal Mail
Cummings Ltd	Ryder
Dachser	Sainsburys
DAF Trucks Limited	Saints Transport
Daimler	SBS
Deepstore Records Management	Scania
Dennis Eagle	Scarab-Sales
DfT	Serco
DHL Supply Chain	Shell
DHL UK	Shredstation
DairyCrest	Siemens Financial Services Ltd
Doddle	Simply Waste Solutions
Dore to Door Specialist Handling Ltd	Sir Robert Alpine
DPD Group	Skanska
DSM (Distribution Services Management)	Sky
DVLA	Smithfield Market Traders Association
Eezehaul Logistics	Society of Motor Manufacturers and Traders
E Moss	South West Truck & Van
Emsol	Specialist Fleet Services
Energy Saving Trust	Tarmac

Enterprise Car Club	Tesco
EO Charging	Tevva Motors
Erith	The Co-Operative Group
Europcar	The First Mile
Eurovia UK	The Linde Group
Event Concept	The Regional Training Centre
Evo-Group/Truline	The Society of Golden Keys
Excalibre Technologies Ltd	Thermo King
Federation of Licensed Victuallers Association	Tideway
Federation of Small Business	TJ Hammond Transport
Federation of Wholesale Distributors	TKMaxx
Fedex	TNT
Fleetcor	Top Flight Couriers
Flush Media	Tracsis
FM Conway	Transport and Travel Research
Ford Motor Company	Trucking Magazine
Ford Transport Operations	Trueline
FORS Community Partnership	Ubeequo
Freight Transport Association	UK Hospitality
Frigoblock	UK Warehousing Association
Fruit 4 London	UKLPG
FSB	UKPN
GAP Group	United Utilities
GasCorp Holdings	UPS
Gasrec	VansA2Z
Gnewt Cargo	Voltia
Green Freight Europe/EST	Volvo Group London
Greenstick Energy	VVPLC
Grundon Waste Management	W. Howard Ltd
Guest Trucks	Walls and Ceilings
H2gogo Industries	Warburtons
HA Boyse and Son	Wego Carbon Neutral Couriers
Heathrow Airport	West End (Chinatown) Tenants Association
Heathrow Truck Centre Ltd	West Midlands ITA
Hermes	Whirlpool Corporation
Hermes Parcelnet Limited	Wilcox Commercial Vehicles
Hotchkiss Ltd	William Hain Ltd
Howdens	William Jackson Food Group
ICE	Wincanton
Iceland	WJ
Ikea	XPO

Imagineline	Zipcar
Innogy	

Stakeholder organisations: Taxi and private hire interests

Addison Lee	Licensed Taxi Drivers Association
App Drivers and Couriers Union	Licensing Private Hire Car Association
Bolt	London Cab Drivers Club
Chauffeur and Executive Committee	Ola
City Fleet	Private Hire Board
ComCab	RMT Taxi Branch
FreeNow	Uber
Gett	Unite the Union
GMB Union	United Cabbies Group
Greater London Hire	ViaVan
LEVC	

Stakeholder organisations: Public transport, walking and cycling interests

Chingford Line User Group	London Cycling Campaign
Camden Cyclists	Rail Delivery Group
Campaign for Better Transport	Ramblers
Clapham Transport Users group	Richmond and Kingston Accessible Transport (RaKAT)
Cycle Islington	Sustrans
East Surrey Transport Committee	Sutton Community Transport
H & F Community Transport Project	Tower Hamlets Wheelers
Harrow Cyclists	Transport for All
Harrow Monitoring Group	Wandsworth Community Transport
Harrow Rail Users Group	WestTrans
Lambeth Cyclists	Westway Community Transport

Stakeholder organisations: Airports interests

Heathrow Airport	London City Airport
Gatwick Airport	London Luton Airport

Stakeholder organisations: Age interests

Age UK (London branches)	Greater London Forum for Older People
Ageing Better in Camden	Kensington & Chelsea Forum for Older Residents
Bexleyheath & District Club for the Disabled	Kilburn Older Voices Exchange (KOVE)
Brent Irish Advisory Service	Merton Senior Citizens Forum
Camden Chinese Community Centre Chinese Housebound Project	Richmond Upon Thames Forum for Older People
City Connections Service (Part of Age UK East London)	Somali Elderly and Disabled Centre
Cypriot Elderly and Disabled Group (Enfield)	Wandsworth Older People's Forum
Elders Voice	

Stakeholder organisations: Resident and tenant interests

A2Dominion Homes Limited	Higham Residents Association
Addiscombe and Shirley Park Residents Association	Highbury Fields Association
Advance Housing and Support Limited	Highgate Society
Affinity Sutton Homes Limited	Housing & Care 21
AmicusHorizon Limited	Hyde Housing Association Limited
Anchor Trust	Ibscott and Wyhill Tenants and Leaseholders Association
Angel Association	Keniston Housing Association Limited
Barbican Association	Leftley Estate Community Association
Barclay Road Residents Association	London & Quadrant Housing Trust
Barking and Dagenham Leaseholders Association	Look Ahead Care and Support
Barking Reach Residents Association	Loughborough Junction Action Group LJAG
Barnes Community Association	Marylebone Association
Barnet Residents' Association	Merton & Sutton Mediation
Barnet Society	Merton Park Ward Residents Association
Becontree Residents Association	Moat Homes Limited
Becontree Ward Central Tenants and Residents Association	Mount Green Housing Association Limited
Bexley Churches Housing Association Limited	Network Housing Group
Brixton Forum	North Cray Residents' Association

Brockley Hill Residents' Association	Norwood Action Group
Camden Cutting	Norwood Forum
Central Croydon Community Action	Notting Hill Housing Trust
Chadwell Heath Residents Association	Old Ford Housing Association (Circle Housing)
CHASE Residents' Association	Omega Housing Limited
Chestnuts	One Housing Group Limited
Chislehurst and Sidcup Housing Association	Orbit Group Limited
Christian Action Housing Association	Orbit South Housing Association Limited
Clapham Park Forum	Outward Housing
Cold Blow Residents Association	Pavilion Resident association
Co-operative Development Society Limited	Peabody Trust
Copper Mill Heights Resident Association	Perryview Housing Co-operative Limited
Coppermill Heights	Poplar HARCA
Coppies Grove Residents Association	Providence Row Housing Association
Coulsdon West Residents' Association	Riverside Community Association
Covent Garden Community Association	Russian Community Association
Craymill Housing Co-operative Limited	Sanctuary Housing Association
Croydon Communities Consortium (CCC)	SE5 Forum for Camberwell
Dowsett Estate Residents' Association	Shepherds Bush Housing Association Limited
Ealing Community Network	Southern Housing Group
East Coulsdon Residents' Association	Spitalfields Housing Association
East Homes Limited	Stockwell Forum
East Thames Group	Streatham Action
Eastend Homes	Swan Housing Association
Family Mosaic	Teachers' Housing Association Limited
Ferry Lane Action Group (FLAG)	The Residents' Society of Mayfair & St. James's
Fulham Estate Residents Association	The Riverside Group Limited
Gallions Housing Association	The Soho Society
Gateway Housing Association	Tower Hamlets Community Housing
Genesis Housing Association	Tower Hamlets Homes
H & F Federation of Tenants and Residents Association (HAFFTRA)	Town and Country Housing Group

Habinteg Housing Association Limited	Townshend Close Housing Co-operative Limited
Hale Village	Walthamstow Village Residents Association
Harrow Federation of Tenants & Residents' Associations	Wandle Housing Association Limited
Hazel Housing Co-operative Limited	Warwick Gardens Residents' Association
Hexagon Housing Association Limited	Whitworth Housing Co-operative Limited

Stakeholder organisations: Accessibility and disability interests

AccessAble	Harrow & Brent United Deaf Club
Action and Rights for Disabled People in Newham	Harrow Association of Disabled People
Action and Rights of Disabled People in Newham	Harrow Samaritans
Action Disability Kensington & Chelsea	Havering Association for People with Disabilities (H.A.D)
Action for Hearing Loss	Hillingdon Access & Mobility Forum
Action on Disability	Hillingdon Autistic Care and Support
Action Space	Hounslow Deaf Club
Advocacy for All	Hounslow Disability Forum
Advocacy in Greenwich	Ilford Shopmobility (Disability Redbridge)
Advocacy Project	Inclusion London
Alzheimer's Society for Lambeth and Southwark	Independent Disability Advisory Group (IDAG)
Alzheimer's Society Croydon	Jami (Jewish Association for Mental Health)
Alzheimer's Society Dementia Support Service Wandsworth	Jewish Deaf Association
Alzheimer's Society UK	Just Say Parents Forum
Arnold House — Leonard Cheshire Disability	Kensington Residents Group
Asian People's Disability Alliance	Kent Association for the Blind
Aspire Wellbeing	Lambeth Dementia Alliance
Association of Muslims With Disabilities	Lambeth Living Well Collective (the Collaborative)
B&D Access Group & IDDP	LB Richmond & Wandsworth
Balham Resource Centre	LDN 4U Camden
Barnet Torch Fellowship Group	LDN 4U RBKC
Bexley Deaf Centre	LDN 4U Westminster
Bexley Dodgers Boccia Club	LDN Drop-in Hub (Westminster)
Bexley Down's Syndrome Group	Learning Disabilities Forum

Bexley Mencap	Learning Disabilities Partnership Board
Bexley Snap	Leonard Cheshire Disability
BlindAid	Lewisham Nexus Service
Brent Disability Forum	Local Voices and Accessible Transport Forum
Brent Mencap	London Vision
Brent MIND	London Visual Impairment Forum (LVIF)
Brent Visual Impairment Service	Mencap
British Blind Sport	Merton Children with Disabilities Team
British Disabled Angling Association	Middlesex Association for the Blind
British Heart Foundation	Mind Croydon
Bromley and Lewisham Mind	Mobility Services
Bromley Experts by Experience CIC	NAS Lambeth Branch
Bromley Mencap	National Asthma Campaign
Bromley Mobility Forum (XbyX Bromley)	National Autism Society
Bromley Voice	National Autistic Society, Merton Group
Bromley Well	New Directions Enfield Learning Disability Support
Bromley, Lewisham and Greenwich Mind	North West London wheelchair services user
Camden Carers' Group and Former Carers' Group	Park Avenue Disability Resource Centre
Camden Disability Action	Parkinson's UK
Camden Learning Disabilities Service	Queen Elizabeth Foundation Mobility Services
Camden People First	RBKC Mobility Forum
Camden Society Choices	Real - Local Voices and Accessible Transport Forum
Celebrations Theatrical Group	Redbridge Disability Association
Centre 404	Redbridge Disability Consortium
Certitude Travel Buddies	Remploy
Chainreaction	Respond
Cheviots Children's Disability Service	Rethink advocacy
Choice in Hackney	Richmond MENCAP
Choice Support	Richmond Transport and Mobility Forum
Conquest Art	RNIB
Creative Support	Royal Society of Blind Children
Croydon Disability Forum	RUILS/Mobility Forum and Transport Action Group
Croydon Mencap	Scope
Croydon Mobility Forum	Sensory Needs Forum

Croydon People First	Service User Network (SUN)
Crutch Haringey	South East London Vision (SELVIS)
DASH	Southwark Mobility Forum
Deaf Access	Speak Out In Hounslow
Deaf Ethnic Women's Association (DEWA)	St Joseph's Pastoral Centre
Disability Action In Islington	Sutton Mencap
Disability Action in the borough of Barnet (DabB)	The Disability Confident Action Group (DCAG)
Disability Advice Service	The Enfield Branch of the National Autistic Society
Disability Backup	The Kingston Association for the Blind
Disability Equality Forum	The Kingswood Centre
Disability Horizons	The Royal Association of Deaf People (RAD)
Disability Inspired Alliance	Thomas Pocklington Trust
Disability Network Hounslow	Tower Hamlets Accessibility Forum
Disability Rights UK	Tower Hamlets Mental Health Partnership Group / Community Options Involvement Network
Disablement Association Barking and Dagenham (DABD)	Trailblazers, Muscular Dystrophy UK
Elfrida Rathbone Camden	Transport for All
Enfield Disability Action	Valuing People Network
Enfield Mencap	Visually Impaired in Camden
Epilepsy Society	W9 Empowerment Group
Fight for Sight	Waltham Forest Disability Resource Centre
Friends of African Caribbean Carers and Sufferers of Dementia	Waltham Forest Mobility Forum
Gateway Club - Orpington and Bromley	Wandsworth Community Transport
Greenwich Association of Disabled People	Wandsworth Learning Disabilities Network
Guide Dogs UK	Wandsworth Mobility Forum
H&F Disability Forum	West Hampstead Parents Group
H&F Local and Vocal Hub	Westminster City Council, Learning Disability Partnership
HACS	Wheels for Wellbeing
Haringey Association for Independent Living (HAIL)	Whizz-Kidz
Haringey Mencap	Wingate and Finchley FC Disabled Fans' Forum
Haringey Wheelchair User Group	Winvisible (Women With Visible and Invisible Disabilities)

Stakeholder organisations: Health and care interests

About Me Care & Support	Kensington and Chelsea Health Trainer Service
Adults and Health	Kingston Wellbeing Substance Misuse Service
Asthma UK and British Lung Foundation	Mental health and wellbeing network
Barnet Bipolar Self Help support group	Moorfields Eye Hospital
Barnet Parent Carer Forum	Nafsiyat Intercultural Therapy Centre
Barnet, Enfield and Haringey Mental Health NHS Trust	NHS Confederation
Barts NHS Trust	NHS South East London
Bexley Clinical Commissioning Group	Nightingale Community Hospice
Bluebird Care	North Central London NHS CCG
BME Health Forum	North East London NHS CCG
Brent Gateway Partnership	North London Asian Care
Bubic	North Middlesex University Hospital
Camden Carers' Service	North West London NHS CCG
Carers' Hub (Carers of Barking and Dagenham)	Oxleas NHS Foundation Trust
Carers network	Parent Forum
Carers' Support (Bexley)	Parents Forum Resource Group
Carers Trust Lea Valley Crossroads Care Service	Public Health England
Carers UK	Royal National Orthopaedic Hospital NHS Trust
Central and North West London NHS Foundation Trust	South East London NHS CCG
Central Middlesex Hospital	South West London NHS CCG
Children's Service	St Ann's Hospital
Crossroads Care Enfield	STS First Aid
Ealing Hospital	The Manor House Centre for Psychotherapy and Counselling
Enfield Carers Centre	University College London Hospital NHS Trust
Enfield Health and Social Care Partnership	Wandsworth Mental Health Resource Centre
Excel Women's Centre	Wembley Taekwondo
Go Golborne Project	Westminster Drug Project
Great Ormond Street Hospital for Children NHS Foundation Trust	Willesden 2011 Judo Club
Guy's and St Thomas NHS Trust	Willesden Cycling Club
HAGA	Willesden Sportability Club
Haringey Advisory Group on Alcohol (HAGA)	Willesden Sports Centre

Haringey Clinical Commissioning Group	Willesden Triathlon Club
Healthwatch (inner London branches)	Willesden Volleyball Club
Imperial College Healthcare NHS Trust	Yoga in Daily Life Association UK
Institute of Psychotherapy and Disability	

Stakeholder organisations: Commerce, local trader, night-time economy interests

1Love	Lefkara Association of Great Britain - Enfield Branch
Aimer Products Limited	Let's Go Business Hub
All Safe and Sound Ltd	London and Partners
ALVA	London Chamber of Commerce and Industry (LCCI)
Amma Radek	London Higher
Argent LLP	London Soccerdome
Augustin's Solicitors	London Stadium
Baker Street Quarter Partnership	London Tourism Co-operative (SOS)
Barking & Dagenham Chamber of Commerce	Lordship Hub Co-op
Blakeney Group (Lloyd Webber theatres)	Markfield Beam Engine and Museum
Blue House Yard	Merlin Entertainments Group
British Chambers of Commerce (BCC)	New River Studios
British Independent Retailers Association	O2 Arena
Cassel Hospital	Pearson's in Enfield
Certax Accounting	PwC
Chickenshed	Richmond Royal Hospital
CoMo	Siemens Crystal
Compass	Skanska UK plc
Confederation of British Industry (CBI)	Skills & Training Network
Cornerstone Business Recovery	Society of London Theatre (SoLT)
Craving Coffee	Society of London Theatres
Creative Industries Federation	Society of the Golden Keys
Crossriver Partnership	Somerset House Trust
E20	South East London Chamber of Commerce
Elevation Training and Empowerment CIC	Tech London Advocates
Elevation-Profile C.I.C.	TechUK

Enfield Vision	Teddington Memorial Hospital
Enterprise Enfield	Thames Clipper
ExCeL	The Crown Estate
Excitech Ltd	The Engine room
FASTSIGNS	The Mall Wood Green
Federation of Small Businesses	The Mill Project
Fusion foods	The Portman Estate
Godwin Lawson Foundation	The Vue
Great Portland Estates plc	The Wenta Business Centre
Green Cross First Aid Training	TheCityUK
Green Lanes Shopping Centre	Tottenham Hale Retail Park (Workman Retail)
Haringey Association of Neighbourhood Watches	Tottenham Hotspur Football & Athletic Co. Ltd
Haringey Law Centre	UK Coach Operators Association
Harringay Traders	UPHD
Hien Le & Co Chartered Accountants	Visit Britain
Holiday Inn Stratford	Visit London
Hope and Restoration/trading as H&R Training Professionals	Visitor Economy Advisor
HuskBrewing	Wake Up Docklands
IoD	Westfield
JFG Communications	Westfield Group
John Lewis Partnership	Westminster Property Association
Kent Solicitors	Yellow Pavilion

Stakeholder organisations: Business improvement districts

Aldgate BID	Kingston First
Angel.London	London Riverside BID
Argall BID	Love Uxbridge
Baker Street Quarter Partnership	Love Wimbledon
Be Richmond BID	Make it Ealing BID
Beddington Industrial Area BID	Marble Arch London
Bee Midtown BID	McDonalds PLC
Better Bankside BID	New West End Company (BID)
Bexleyheath Town Centre BID	Orpington First
Blue Bermondsey BID	Positively Putney BID
Brixton BID	Purley BID
Camden Town Unlimited	Sidcup Partners
Cheapside Business Alliance	South Wimbledon Business Area
Croydon BID	Southbank Partnership
Euston Town Unlimited	Stratford Original BID
Fitzrovia Partnership	Successful Sutton BID
Future Wood Green BID	Team London Bridge

Hammersmith BID	The Northbank London
Hampstead Village BID	This is Clapham
Harrow BID	Try Twickenham BID
Hatton Garden BID	Vauxhall One
Heart of London BID	Wandsworth Town Bid
Ilford BID	We Are Waterloo
IN Streatham BID	West Norwood & Tulse Hill BID
IN West Ealing	Willow Lane BID
Kimpton Industrial Park Proprietors Association	

Stakeholder organisations: Education and youth interests

Alexandra Park School	Newham College of Further Education
Barnet Lone Parent Centre	Newham Sixth Form College
Barking & Dagenham Children's Centre	Oasis Academy Hadley
Britannia Village School	Park View School, West Green
Broomfield School	Pavilion resident association
Capel Manor College	Pembury House
Chace Community School	Rainham ROYALS Youth Centre
Drew School	Ruislip Young People's Centre
Ebrahim Community College	Sidcup Youth Centre
Edmonton County School	St Michael's Primary School
Enfield County School	St Michael's School of Governors
Enfield Grammar School	The Sulgrave Youth Club
Ferry Lane Primary School	UCL
Fountains Mill Young People's Centre	Unite Students
Grange Day Centre	University of East London
Greenwich Mums	University of the Third Age
Greenwich University	Waverley School
Haringey School Liaisons	West Drayton Young Peoples Centre
Haringey Sixth Form College	West Lea School
Heatham House Youth Centre	Westside Young Leaders Academy
Highgate School	Westside Young People Centre
Highgate Schools Transport Coalition	Whitehorse Youth Centre
Hillingdon Dads (SEND Family Support)	Willesden Supplementary Saturday School
Imperial College London	Woodside High School
Into University	Youth Action Diversity Trust
Lordship Lane Primary School	

Stakeholder organisations: Race and ethnicity interests

African & Caribbean Heritage Association	KEY Knowledge Enriches You
African French Speaking Organisation	Kongolese Children's Association
Asylum Aid	Lambeth Chinese Community Association
B.A.P Theatre LTD	London Gypsy and Traveller Unit
Bexley African Caribbean Community Association (BACCA)	Muslim Cultural & Welfare Association of Sutton
Bexley Association of Turkish Speakers (BATS)	Muslim Cultural & Welfare Association of Sutton - Sister Group
British Afghan Women's Society	Sangam
Croydon BAME forum	Sisters In Islam - Muslim Youth Club
East London Chinese Community Centre	Somali Parent and Children Play Association
Enfield Caribbean Association	Sutton Centre for Equalities
Enfield Racial Equality Council	Tamil Relief Centre
Enfield Somali Community Association	The Shane Project
Gargaar Somali Welfare Association	Wapping Bangladesh Association
Ghanaian Welfare Association	Wellbeing Connect
Goldy Goldy Asian Women's group	West Indian Self Effort (WISE)
Greek & Greek Cypriot Community of Enfield (GGCCE)	West Indian Senior Citizen Organisation (WISCO)
Hindu Society	Young Roots
Iranian Community Service	

Stakeholder organisations: Religious interests

Al Manaar- The Muslim Cultural Heritage Centre	Network of Sikh Organisations UK
Asian Women's Lone Parents Association	No Place for Hate Forum
Bevis Marks Synagogue	Sacred Heart Church
Churches Together	Salvation Army
Darul Aman Trust (MASJID)	St Peters Italian church
Dorjechang Buddhist Centre	Stand In The Gap
Faith Regen Foundation LTD	Sutton Salvation Army
Faiths Together in Croydon	Tower Hamlets Inter-Faith Forum
Faiths Together in Lambeth	Wembley United Synagogue
Highway House	Westminster Chapel
Highway of Holiness Youth Club and Training Centre	Wildfire Urban Key
Hillside Church	Willesden 7th Day Adventist Church

Holy Trinity Church	Willesden Green Baptist Church
Hope in Tottenham	Yogi Divine Society (YDS UK)
Lambeth Multi-Faith Action Group	Youth with a Mission Urban Key (London)
London Faiths Forum	Yusuf Islam Foundation
Mitcham Lane Baptist Church	

Stakeholder organisations: Environmental interests

Chartered Institute of Environmental Health	Living Streets
CleanAir London	Mums for Lungs
Environment Agency	Natural England
Historic England	

Stakeholder organisations: Safety interests

Brake charity	Roadpeace
British Youth Council	RoSPA
Child Accident Prevention Trust	Sarah Hope Line
Fawcett Society	Suzy Lamplugh Trust
London Road Safety Council	

Stakeholder organisations: Other

50+ restart	Home-Start Haringey
Abbey Children's Centre Nursery	Hurst Community Centre
ARCA Generation	Ilse Amlot Centre for Women and Children
Artsrichmond (Richmond upon Thames Arts Council)	Independent Living Agency
Betar Bangla	Institution of Civil Engineers (ICE)
Better Archway	Isleworth Explorers Club
Bexley Civic Society	Islington Archaeology and History Society
Bexley Neighbourhood Watch	Jags Foundation CIC
Bexley Voluntary Service Council	K&C Social Council
Bioregional	Katherine Low Settlement
Blenheim - Insight	Linden Hall Community Centre
Bridge Renewal Trust	London Assembly Green Party Group
British Land	London Food Alliance
British Property Federation	London Friend
Bromley Living Streets Group	London Senior Social
Build UK	Love Hampton Hill
Canonbury Society	Merton Centre for Independent Living

Carers Hub	Muslim Cultural & Welfare Association of Sutton
Castlehaven Community Association	National Trust
Centre for Cities	North Cray Neighbourhood Centre
Centre for London	Northumberland Heath Community Forum
Charlton Athletic Community Trust	Northumberland Park Advice Service
Chatham Hall	Oakleigh School and Early Learning Centre
Citizens Advice	Parkside Community Centre
City Gateway Women's Project	PLOS Theatre Company
Civil Engineering Contractors Association (CECA)	Praxis Community Projects
Club SW18-2-35	Rail Delivery Group
Community Cafe	Rainbow Hamlets
Community Cook Up	Rainbow Trust Children's Charity
Community Southwark	RBKC Mobility Forum
Considerate Constructors Scheme	Richmond Concern Society
Construction Industry Council (CIC)	Richmond Music Trust
Core Cities UK	Rotary Club - Bromley
County Hall Owners and Residents Association (CHORA)	Sidcup Community Group
Craftory Workshop	Slade Green Community Forum
Crayford Community Centre	Society Links Tower Hamlets
Crayford Forum	Southwark Disablement Association
Cultural Industries Development Agency	Spare Tyre - Arts and Theatre
Dalgarno Trust	Sprout Community Arts
Dorset Community Association	St Barnabas Monday Club
Dovetail Community Outreach	St Hilda's Community Centre
Ealing Centre for Independent Living	St John's Hill Centre
East London Advanced Technology Training	St Margaret's Community website
East London Garden Society	St Mungo's
Eastside Youth Havering	Stifford Community Centre
ELOP - East London out Project	Sundridge Park Working Men's Club
Enfield Clubhouse	Sutton LGBT Forum
Enfield People's Project	Teddington Society
Enfield Visually Impaired Bowls Club	Teddington Town website
English Heritage	The Islington Society
Erith Town Forum	The Lesbian and Gay Foundation - Carers Online Forum
Essex Wildlife Trust	The Purple Penguin Club
Euston Design	The Rooted Forum
Every Parent & Child	Totally Richmond
Family and Youth People CoL	Tottenham Hotspur Foundation

Fight for Peace	Tottenham Traders Partnership
Friends of Alexandra Park	University of the Third Age Bromley
Hackney and Tower Hamlets Friends of the Earth	Wandsworth LGBT Forum
Hampton Wick Society	Willesden and Brent Chess Club
Haringey Borough Women's Football Club	Willesden District Scouts
Haringey Boxing Club	Willesden Green Town Team
Haringey Citizens Group	Willesden Local History Society
Haringey Cycling Campaign	Women's Institute (North West London)
Haringey Women's Forum	Wood Green Works
HBC Community Centre	Work Rights Centre
Highbury Roundhouse Community Centre	Young Brent Foundation
Hilldrop Community Centre	Young's Football Coaching School
Hillingdon Asian Women's Group	Your Life You Choose
Hillingdon Community Transport	Youth Engagement Solutions Ltd
Hillingdon Somali Women's Group	Youth Offending Service
Hillside Clubhouse	Zebra Cross Children's Club

Appendix G: Summary of stakeholder responses

Appendix G: Summary of stakeholder responses

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Political	Business representative groups	Businesses	Transport	Faith	Community
Borough & Bankside Ward Southwark (3 dlrs)	Aldgate Connect BID	Api Cultural	Addison Lee	All Souls Serve the City	Army cadet force
Caroline Pidgeon AM	Central District Alliance BID	Atkins Electrical	Brewery Logistics Group	Bermondsey Central Hall Methodist Church	Bloomsbury Air
City of London Corporation	Confederation of British Industry	Change Group (travel money)	British Vehicle Rental and Leasing Association	Brotherhood of the Cross and Star	Camden Cycling Campaign
GLA Conservatives	Federation of Small Businesses	Grovers of Borough Market	Campaign for Better Transport	Churches Together in Westminster	Clapham Public Transport Users Group
LB Camden	Heart of London BID	HCA Healthcare UK	Collaborative Mobility UK	City Temple URC	East Dulwich Residents
LB Hackney	Independent Healthcare Providers Network	High Security Alarms	FREE NOW	Diocese of London	Harlesden Neighbourhood Forum
LB Islington	KIPPA BID	Jubilee Market Hall	Freedom for Drivers Foundation	Eleventh Church of Christ, Scientist	Harrow Council for Justice
LB Tower Hamlets - note, this is an officer led response on behalf of the Transport Planning Team and does not necessarily reflect the views of our executive mayor and council cabinet.	Logistics UK	Little Big Leaders	GMB	Guild of St Brides	London Ambulance Service NHS Trust
Sian Berry AM	London Chamber of Commerce and Industry	London Electric Vehicle Company	Licensed Private Hire Car Association	Hinde Street Methodist Church	London Forum of Civic and Amenity Societies
Westminster	London Chinatown Chinese Association	LTC CENTRAL LIMITED, Scaffolding, Roofing and brickwork.	London Cycling Campaign	Kingdom Faith Church Trust	Physic Triangle RA
	Musicians Union	LW Theatres	London Living Streets	Mandarin Evangelical Church	Southwark Cyclists
	New West End Company	Medical Dispatch	London Road Safety Council	Metropolitan Tabernacle Baptist Church	Spitalfields Housing Association
		Piper Transport Services	London TravelWatch	Nine Churches in Westminster/ Emmanuel Church	
		Public Eye (PR)	RAC Motoring Services	Notre Dame de France RC Church	
		Ristretto Events	Railfuture	St James RC Church, Spanish Lane	
		Royal Academy of Arts	Road Danger Reduction Forum	St Olave Hart Street	
		Royal Mail Group	Road Haulage Association	St Peters Italian Church	
		Sibilla Food Importers	Zipcar	The Chapter of Southwark Cathedral	
		Sterling Lights		Westminster Chapel	
		United Fitness Brands			
		UPS			

1. Political representatives and organisations

Borough & Bankside Ward Southwark councillors Councillors Victor Chamberlain, Adele Morris and David Noakes	<p>The Borough & Bankside ward councillors [LB Southwark] are concerned about the current scheme's impact on residents in the zone. They welcome the proposals – in particular the return of the residents' discount. They are concerned about bus service reductions and the lack of night tube. They suggest a campaign to encourage travelling by public transport into the zone.</p>
Caroline Pidgeon Liberal Democrat Assembly Member	<p>Caroline Pidgeon AM would like to see a sophisticated form of road pricing based on charging per mile travelled, the local demand on roads and the level of pollution created by a vehicle. She also suggests a variable charge for when congestion is at its highest. She generally welcomes the proposals for discounts and exemptions, but would like to see discounts for car clubs.</p>
City of London	<p>The City of London supports reduced evening charging hours on weekdays and weekends.</p> <p>They suggest reconsidering the need for a Sunday/Bank Holiday charge to help the leisure and culture sectors, and faith communities.</p> <p>They suggest a smarter, more dynamic approach to road user charging from 2026 when the current road user charging contracts end.</p>
GLA Conservatives Keith Prince Assembly Member	<p>Keith Prince AM states the current temporary charge has been arduous for many. He would like to see a return to the pre-pandemic charging conditions. They should be reintroduced without delay – particularly the residents' discount. He suggests a discount for car clubs.</p>
LB Camden Cllr Adam Harrison	<p>LB Camden supports most of the proposals but would like to keep the 10pm end to the charging hours to deter motor traffic.</p>

	They suggest increasing the level of charge annually in line with inflation.
LB Hackney	<p>LB Hackney suggests a 7pm end to the charge would reduce incoming evening traffic from overlapping with the evening peak. 7pm would be consistent with other timed restrictions like bus lane hours.</p> <p>They are concerned that an increase in evening traffic will impact the attractiveness of cycling and walking. They added that public transport should be the standard promoted and facilitated for all journeys into Central London. However, they also recognise the importance of the night-time economy so would accept a 6pm end, but with a £15 charge as a reasonable compromise.</p>
LB Islington	LB Islington are supportive of the proposals. They suggest an expanded, variable road charging system.
LB Tower Hamlets	LB Tower Hamlets state that the reduction in operating hours of the charge at weekends and during weekday evenings will make it more difficult to achieve targets in sustainable mode share. They want the charging hours to end at 10pm every day.
Sian Berry Assembly Member	Sian Berry AM is opposed to the proposals where they may encourage motor traffic and private car ownership. She suggests the best solution to congestion in London isn't the congestion charge, it is smart, fair, privacy-friendly road charging.
Westminster City Council	Westminster City Council are generally supportive of the proposals, including the £15 charge and the return of the residents' discount. They also support the reduction of charging hours to 6pm to support the night-time economy.

	They strongly object to weekend and Bank Holiday charging for the impact on hospitality workers and places of worship.
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2. Business Representative groups

Aldgate Connect BID	Aldgate Connect BID opposes reducing the charging hours. They believe there will be more congestion and freight traffic from 6pm, causing pollution.
Central District Alliance BID	The Central District Alliance support improving air quality, but are concerned the proposals will also impact on motorists and businesses who have to drive into London. They also state that weekend footfall is much lower than weekday footfall, and have concerns the measures may deter weekend travel into central London.
Confederation of British Industry	<p>The CBI consider that against an uncertain economic backdrop, the permanent introduction of the combined proposals would have a material impact on businesses.</p> <p>They state the proposals would increase business costs. They are concerned that the removal of Auto Pay would increase administration costs.</p> <p>They make suggestions for discounts and exclusions including increased discounts for freight operators and a discount for businesses carrying out emergency infrastructure repairs.</p>
Federation of Small Businesses (FSB)	The Federation of Small Businesses is opposed to the proposals, particularly the £15 charge, for the financial impact on businesses which may not be able to absorb extra costs. They request the £11.50 charge is reinstated.

	They suggest weekend exemptions be given to specific market traders and construction-related small businesses.
Heart of London Business Alliance (HOLBA)	The Heart of London Business Alliance is opposed to the proposals which increase the scope and cost of the Congestion Charge. They feel the proposals will discourage visitors to the West End and negatively impact struggling businesses. They suggest new, fairer charging mechanisms should be considered.
Independent Healthcare Providers Network	The Independent Healthcare Providers Network supports reimbursement arrangements for NHS staff and patients, and would like them extended to the private healthcare sector They suggest reimbursement arrangements are extended to operate outside of pandemics.
KIPPA BID Limited (Kimpton Industrial Park in Sutton)	The KIPPA BID Limited has concerns about the proposals due to the effect on businesses.
Logistics UK	Logistics UK is opposed to the proposals, particularly the £15 charge, weekend charging and removal of fleet Auto Pay. They support the daily reduction of charging hours to 6pm.
London Chamber of Commerce and Industry	The London Chamber of Commerce and Industry supports the reduction of hours to 6pm. They oppose the increased charge and removal of fleet autopay, as they will add to the cost burden on businesses. They suggest the development of a more streamlined road user charging scheme.

London Chinatown Chinese Association	<p>The London Chinatown Chinese Association opposes the proposals for a £15 charge and weekend charging. A weekend charge would negatively affect Chinese businesses, Sunday schools and social activities.</p> <p>They support reducing the hours to 6pm and generally suggest reverting to pre-pandemic charging conditions.</p>
Musicians Union	<p>The Musicians' Union suggest a 5pm end to the charge, instead of 6pm. Many musicians have to drive into central London due to having large, bulky instruments that can't be carried on public transport. Paying the charge would considerably affect their take home pay.</p>
New West End Company	<p>New West End Company surveyed 60 businesses to inform their comments.</p> <p>They oppose increasing the scope and cost of the Congestion Charge because of the effect on businesses.</p> <p>They suggest postponing the Sunday charging.</p>

3. Businesses

Api: Cultural (sustainable urban bee keeping)	<p>Api: Cultural [sustainable urban bee keeping] welcome the reduced weekday charging hours, no Christmas charge and the return of the 90% discount for residents.</p> <p>They oppose weekend charging as it will affect them meeting clients in the zone. They would like to see reimbursements introduced for London's beekeepers.</p>
Atkins Electrical Ltd	<p>Atkins Electrical Ltd state the charging hours proposals won't affect their electrical business. But it will suffer due to the £15 charge. This will affect their profitability, on top of the cost of new environmentally compliant vans, parking charges and material costs having increased due to Brexit.</p>
Change Group (travel money specialist)	<p>The Change Group suggests the charge should be £25 or higher, for more investment in public transport like in Singapore.</p>
Grovers of Borough Market	<p>The Grovers of Borough Market suggest that businesses in the zone get a discount.</p>
HCA Healthcare UK	<p>HCA Healthcare state that safe travel around London continues to be an issue for those with certain conditions.</p> <p>They suggest the exceptional reimbursement scheme should include vulnerable private patients, as well as NHS patients.</p>

High Security Alarms Ltd	High Security Alarms Ltd comments that an intruder alarm specialist needs to carry over 20kg of batteries plus other tools, so needs to drive. They used to book visits at the weekend, but the new plans will stop that. They state they can't absorb the extra charges and their customers will suffer. They consider small businesses will be forced out of London because of all the charges on motorists.
Jubilee Market Hall Ltd	The Jubilee Market Hall Ltd suggests that small businesses, such as market traders that have to bring stock via vehicles, should also receive the 90% discount.
Little Big Leaders	Little Big Leaders finds the proposals discriminatory against the poor and disadvantaged. Face to face tutoring won't be possible for deprived children in the zone due to the charges. They would like an exemption for educators.
London EV Company Ltd.	The London EV Company Ltd suggest an exemption for wheelchair accessible hackney carriages. They suggest a discounted charge for the cleanest commercial vehicles.
LTC Central Ltd (scaffolding, roofing and brickwork)	LTC Central Ltd [builders] oppose charging at the weekend and the reopening of the residents' discount.
LW Theatres	LW Theatres support 6pm weekday charging to help their audience and the economy. They oppose weekend charging hours because of the effect on matinees.

Medical Despatch	Medical Despatch oppose the proposals and queries whether vehicles with ambulance vehicle taxation should be exempt.
Piper Transport Services	Piper Transport Services opposes the resident discount and the Saturday charge.
Public Eye (Public Relations agency)	Public Eye PR supports reduced weekday hours to help London's economy and thinks weekend charging should not happen for the same reason.
Ristretto Events Ltd	Ristretto Events Ltd opposes the removal of the Auto Pay discounts due for the impact on businesses.
Royal Academy of Arts	The Royal Academy of Arts supports the weekday and weekend charging hours to help businesses, and opposes proposals to remove the Auto Pay discounts for the same reason.
Royal Mail Group	The Royal Mail would like advance notice of any changes to help their business adapt, as they have no option but to use vehicles in the zone.
Sibilla Food Importers	Sibilla Food Importers states that it would be better to exclude all traffic except residents and authorised vehicles from the zone. They say that the Congestion Charge doesn't mitigate congestion and don't make the zone accessible to those on lower incomes.
Sterling Lights Ltd	Sterling Lights Ltd note the financial losses incurred by businesses during the pandemic and rather than charges would like to see more traffic lanes, bypasses and flyovers. They think the speed limit should be increased to 30-40mph.
United Fitness Brands	United Fitness Brands runs 18 gyms in London and is against weekend charging, which would further impact businesses badly affected by the pandemic.

UPS	UPS supports the reduction of hours to 6pm.
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4. Transport organisations

Addison Lee	<p>Addison Lee stated that the £15 charge and the extended hours to 10pm almost doubled costs for their drivers operating in the zone. They welcome the proposal to end the charging hours at 6pm.</p> <p>They propose the Congestion Charge cost returns to £11.50 (and £10.50 with fleet auto pay). They do not support weekend charging.</p> <p>They also propose that the exemption for fully electric vehicles should be extended to 2030.</p>
Brewery Logistics Group	<p>The Brewery Logistics Group suggest freight operators should be exempt from the charge as 99% of London's goods are delivered by road. They state that all their trips are essential.</p>
British Vehicle Rental and Leasing Association (BVRLA)	<p>British Vehicle Rental and Leasing Association (BVRLA) state that car clubs support the Mayor's transport priorities - each car club vehicle removes 23.5 private vehicles from the road, reducing congestion and improving air quality.</p> <p>They state the £15 cost and weekend hours of operation would drive up the cost of car clubs and could encourage a return to private car use. They are concerned about the loss of the fleet Auto Pay discount. They repeat their request for a blanket exemption to shared mobility providers who offer ULEZ compliant vehicles.</p> <p>If this is not granted, they suggest various other exemptions for car clubs and rental vehicles to encourage the switch from car ownership to car usership:</p>

	<ul style="list-style-type: none"> • A weekend exemption for car clubs and rental offering ULEZ compliant vehicles • A residents' discount for rental or car club vehicles that reside within the zone • A digitised process that enables operators to apply for discounts and or exemptions • An e-notification system which would notify fleet owners electronically of all penalty charge notices should also be adopted
Campaign for Better Transport	The Campaign for Better Transport broadly support the proposals.
Collaborative Mobility UK	<p>CoMoUK state that car clubs suppress private car use and contribute to the aims of the Mayor's Transport Strategy, each car club in London displaces 23.5 owned cars. They state that the financial impact of the proposals to their business is significant and this was not recognised in the IIA. Not having a discount for car club users living within the zone, but having one for the private cars of residents encourages private car use.</p> <p>They suggest:</p> <ul style="list-style-type: none"> - a residents' discount for car club cars resident in the charging zone - restoration of the Fleet Auto Pay discount - a weekend exemption for car clubs
FREE NOW (a mobility app)	FREE NOW believes that TfL should consider introducing a means-tested approach to residential discounts. A progressive, sliding scale discount should be linked to either house value or family income. They state this would incentivise a switch to public transport.
Freedom for Drivers Foundation	Freedom for Drivers Foundation oppose the proposals as thinks the charge hasn't reduced congestion and is a money-generating tax.

GMB (union)	The GMB oppose charging Private Hire drivers, couriers and those delivering food. These people are often some of the lowest paid workers. They want healthcare reimbursement arrangements (e.g. NHS patients and staff) to be available at all times, not just during pandemics. They suggest a levy on workplace parking, and also that instead of PHVs paying the Congestion Charge there could be a small levy on all trips.
Licensed Private Hire Car Association	The Licensed Private Hire Car Association is opposed to any proposal where they add to costs for PHV drivers (i.e. the increased charge, weekend hours and removal of autopay discounts). They state PHVs reduce car journeys and car ownership, whilst improving London's carbon footprint.
London Cycling Campaign	The London Cycling Campaign supports the proposed charge level. They oppose the reduction in evening hours and reintroducing the 90 per cent discount for new residents, which they say will encourage motor traffic and reverse the recent, large increases to cycling levels. They suggest a smart road user charging system for the whole of London.
London Living Streets	London Living Streets support the proposed charge level, removal of Auto Pay and the principle of weekend charging. LLS calls for the charging hours to run until 10pm every day. They oppose the resident discount. They suggest a smart road user charging system for the whole of London.
London Road Safety Council	The London Road Safety Council supports the extension of hours and inclusion of weekends. They suggest a tiered approach to pricing: large vehicles/fleets pay more while residents and small businesses with one vehicle get a discount or exemption.
London Travelwatch	London Travelwatch support the principle of weekend charging and state that weekday charging until 10pm should be considered if traffic increases.

	<p>They suggest additional pro-bus measures: longer operational hours for bus lanes, a review of parking on bus routes, and more bus and cycle only streets.</p> <p>They also suggest a smart road user charging system for the whole of London.</p>
RAC Motoring Services	<p>The RAC is concerned the proposals won't affect traffic volumes and penalise those with no other options but to drive. They state the charge level was supposed to be temporary.</p> <p>They welcome the greater flexibility for paying and that discounts and exemptions would continue for residents and certain workers.</p> <p>They support schemes which support cycling, but want TfL to pay attention on any impact these schemes have on buses and all other motor vehicles.</p>
Railfuture	<p>Railfuture is opposed to the reduced hours as this will mean more congestion and harm from vehicles after 6pm.</p>
Road Danger Reduction Forum	<p>The Road Danger Reduction Forum is opposed to the current level of the residents' discount (stating that it should be no more than 30%) and reduction in charging hours.</p>
Road Haulage Association (RHA)	<p>The Road Haulage Association are generally opposed to the proposals. They suggest that HGV and van drivers are essential for London, similar to NHS workers and others, and that they should be exempt from the charge. They add that exempting delivery vehicles would assist London businesses to recover.</p>

Zipcar	<p>Zipcar state that car clubs reduce private car use, with each car club vehicle removing 23.5 private cars. They state that car sharing contributes to the aims of the Mayor's Transport Strategy.</p> <p>They state that existing and proposed charges have to date led to a four-fold, multi-million pound increase in the operating costs for Zipcar.</p> <p>Zipcar has stated that car clubs were not invited to contribute to the IIA research on the impact to their businesses. They disagree the proposals would have a neutral impact on them.</p> <p>They state that not having a discount for car club users living within the zone, but having one for the private cars of residents encourages private car use.</p> <p>They suggest:</p> <ul style="list-style-type: none"> - a residents' discount for car club cars resident in the charging zone - restoration of the Fleet Auto Pay discount - a weekend exemption for car clubs

5. Faith organisations

All Souls Serve the City (Charitable Incorporated Organisation)	All Souls Serve the City suggest removing the charge on Sundays and having an exemption for charities. The elderly and disabled struggle to attend services on Sundays when public transport is not as good.
Bermondsey Central Hall Methodist Church	The Bermondsey Central Hall Methodist Church support having reduced evening hours but would like weekend charging removed. The charges affect people travelling to church and with fewer people travelling the church is struggling financially.
Brotherhood of the Cross and Star	The Brotherhood of the Cross and Star oppose Sunday charging, or suggest it could be between 15:00 and 21:00.
Churches Together in Westminster	<p>Churches Together in Westminster oppose the proposals for weekend charging. They say the proposals will affect their sustainability due to members' inability to attend. Poor Sunday public transport levels is also a problem, plus elderly and disabled people can't always use it. Musicians and volunteers with heavy equipment also can't use public transport.</p> <p>They suggest a 2pm start to weekend charging and a reimbursement scheme for faith charities.</p>
City Temple	The City Temple oppose the proposals as the charge increases their costs and decreases the number of people who can benefit from their charity work. They suggest the charge should return to pre-pandemic levels and that private hire vehicle numbers should be limited in the zone.

Diocese of London	The Diocese of London oppose the timings for weekend charging. They suggest a 13:00 start time instead of 12:00 to make services easier for various churches, synagogues and Hindu temples.
Eleventh Church of Christ, Scientist, London	The Eleventh Church of Christ, Scientist is opposed to the proposals for weekend charging which would impact attendance at their services. They suggest not charging on Sundays or an exemption for certain church workers.
Guild of St Bride's	Guild of St Bride's oppose the proposals for weekend charging due to the impact on attendance. They suggest a 1pm start, no charge on Sundays or an exemption.
Hinde Street Methodist Church	Hinde Street Methodist Church suggest that the Sunday charging hours could begin at 13:00 to allow the 11:00 service to finish. This means the elderly and disabled who drive or are driven, would be able to attend.
Kingdom Faith Church Trust	<p>The Kingdom Faith Church Trust runs a food kitchen on Saturdays and a church on a Sunday. Engineering works on Sundays make public transport difficult.</p> <p>They oppose the removal of the Auto Pay discount.</p>
Mandarin Evangelical Church	The Mandarin Evangelical Church are opposed to the proposals for and suggest no charge on Sundays.
Metropolitan Tabernacle (Baptist Church)	The Metropolitan Tabernacle support weekday hours ending at 6pm. They suggest no charging on Sundays.
Nine Churches in the Westminster area	Nine Churches in the Westminster area (listed below) have responded collectively. They are opposed to the proposals for Sunday charging. As well

	<p>as affecting services, the charge will affect children's and youth work, training, outreach and sports activities.</p> <p>The outreach work affected includes foodbanks, debt advice, homeless outreach, Crisis Pregnancy Advice centre, toddler groups, TEFL and homework clubs.</p> <ol style="list-style-type: none"> 1. Methodist Central Hall 2. Emmanuel Church 3. Kingdom Faith Church 4. Westminster Chapel 5. St James the Less 6. The Redeemed Christian Church of God 7. St Etheldreda's Church 8. Christchurch Mayfair 9. Emmanuel Chinese Church
Notre Dame de France RC Church	The Notre Dame de France RC Church opposes the proposals for weekend charging because public transport is expensive for a family. They agree that the daily charge should be increased.
The Chapter of Southwark Cathedral	The Chapter of Southwark Cathedral oppose to the proposals for Sunday charging – they suggest a 1pm start. They support the proposals for the residents' discount.
St James RC Church, Spanish Place	St James RC Church, Spanish Place oppose the proposals for Sunday charging. They suggest a later start to charging on Sundays, 1pm or 2pm.
St Olave Church, Hart Street	St Olave Church suggests the charge starts at 2pm on Sunday.
St Peter's Italian Church	St Peter's Italian Church is against weekend charging as it impacts church attendance on Sundays, as well as businesses and the hospitality sector.

Westminster Chapel	<p>Westminster Chapel state the changes will affect freedom to worship and directly affect the local community (e.g. those who volunteer at the foodbank). They are against Sunday charging.</p> <p>They think the environmental argument for the changes is weak given that ULEZ is operational. They suggest no charge on Sundays.</p>

6. Community Organisations

Army Cadet Force	The Army Cadet Force opposes the proposals and would like a return to the pre-pandemic charges.
Bloomsbury Air	Bloomsbury Air oppose the reduced evening hours. They support a £15 charge and no discount for Auto Pay. They suggest a discount lower than 90 per cent and a surcharge for SUVs and 4x4s. They also suggest support for those on low incomes within the zone.
Camden Cycling Campaign	The Camden Cycling Campaign opposes the reduction in hours to 6pm, as contrary to TfL's stated aims and policies.
Clapham Public Transport Users Group	<p>Clapham Public Transport Users Group state that Streetspace, LTNs and the conversion of some bus lanes to cycle lanes have caused congestion and worsened bus services, particularly affecting the disabled.</p> <p>They think bus services are not being invested in and money from the charge should be used to improve them, instead of cycling and e-scooters.</p>
East Dulwich Residents	The East Dulwich Residents Association states that pollution and congestion in London is getting worse and the proposals do not go far enough.
Harlesden Neighbourhood Forum	The Harlesden Neighbourhood Forum oppose any proposals which might increase traffic at the expense of cyclists and pedestrians.
Harrow Council for Justice	The Harrow Council for Justice requests the Congestion Charge is scrapped as they say it hasn't solved congestion nor improved pollution levels.

	They consider it is a regressive tax that impacts the poor most, and the £15 increase as a way to save the finances of TfL.
London Ambulance Service NHS Trust	The London Ambulance Service NHS Trust suggest continuing the reimbursement scheme or exemption for NHS workers accessing the congestion charge zone for work.
London Forum of Amenity & Civic Societies	The London Forum of Amenity & Civic Societies welcomes the 6pm end to charging hours and also weekend charging. They suggest a more sophisticated system of road pricing. They also request that consideration is given again to the western extension of the zone.
Physic Triangle Residents Association (located in south Chelsea)	The Physic Triangle Residents Association oppose the temporary charging hours and having the charge extended to run at the weekends.
Southwark Cyclists	Southwark Cyclists are opposed to reducing the charging hours, as this proposal will increase motor traffic.
Spitalfields Housing Association	The Spitalfields Housing Association states social tenants who live in Folgate Street on the border of the zone are penalised for things like the school run. They would like the charge returned to pre-Covid rules and are particularly against weekend charging because of the effect on children and families attending events.

Appendix H: Stakeholder responses to the questionnaire

Appendix H: Stakeholder responses to closed questions. Please note, only 44 stakeholders used the questionnaire (either additional to or instead of comments)

Stakeholder	Importance of		Effectiveness of the following to meet TfL’s aims						Importance of
	Reducing traffic and congestion in central London	increasing walking, cycling and public transport	proposed £15 charge	proposed operating hours from 07:00 – 18:00 (Monday to Saturday)	proposed operating hours on Saturday and Sunday and on bank holidays between 12:00 and 18:00 (but not in the period between 25 December and the New Year’s Day bank holiday)	proposed reopening applications for the residents’ discount of 90 per cent	proposed increasing the “pay next day” charge to £17.50 and extend the deadline for making payment to three days	proposed no discount for payments made by Auto Pay or Fleet Auto Pay	
City of London Corporation	Very important	Very important	Moderate effect	Moderate effect		Minor effect		Minor effect	Important
London Borough of Tower Hamlets	Very important	Very important	Moderate effect	Moderate effect	Minor effect	Minor effect	Minor effect	Minor effect	Fairly important
London Assembly City Hall Greens Group	Very important	Very important	Major effect	Major effect	Major effect	Major effect	Major effect	Major effect	Very important
Change Group	Very important	Very important	Moderate effect	Major effect	Major effect	No effect	Minor effect	Minor effect	Important
Grovers of borough market ltd	Fairly important	Fairly important	No effect	No effect	No effect	No effect	No effect	No effect	No opinion
Jubilee Market Hall Ltd	Important	Important	Moderate effect	Major effect	Major effect	Major effect	Major effect	Moderate effect	Very important
Little Big Leaders	Very important	Very important	Major effect	Major effect	Major effect	Major effect	Major effect	Major effect	Very important
London Ambulance Service NHS Trust	Very important	Very important	Moderate effect	Moderate effect	Moderate effect	Don't know	Minor effect	Minor effect	Very important
LTC CENTRAL LIMITED, Scaffolding, Roofing and	Important	Slightly important	No effect	No effect	No effect	No effect	No effect	No effect	Very important
Medical Despatch Event Services	Important	Important	Don't know	Major effect	Major effect	Major effect	Major effect	Major effect	Very important
Ristretto Events Ltd	Very important	Fairly important	Major effect	Major effect	Minor effect	No effect	No effect	No effect	Fairly important
Royal Academy of Arts	Important	Important	No effect	Major effect	Major effect	Major effect	Minor effect	No effect	Not all important
Royal Mail Group	Fairly important	Important	Moderate effect	Moderate effect	Moderate effect	Don't know	Moderate effect	Moderate effect	No opinion
SIBILLA FOODS Ltd.	Very important	Very important	No effect	Minor effect	Minor effect	No effect	No effect	No effect	Not all important
Sterling Lights Ltd.	Slightly important	Not at all important	No effect	No effect	No effect	Minor effect	Minor effect	Minor effect	Important
United Fitness Brands	Very important	Important	Moderate effect	Moderate effect	No effect	No effect	No effect	No effect	Fairly important
Piper Transport	Slightly important	Important	Moderate effect	Minor effect	No effect	No effect	Moderate effect	Major effect	Important
Independent Healthcare Providers Network	Very important	Very important							Very important
Musicians' Union	Very important	Very important	Major effect	Moderate effect	Moderate effect	No effect	Minor effect	No effect	Very important
Addison Lee	Fairly important	No opinion	No effect	Major effect	No effect	Moderate effect	No effect	No effect	Very important
Brewery Logistics Group	Very important	Important	Moderate effect	Moderate effect	Moderate effect	Moderate effect	Moderate effect	Major effect	Important
FREE NOW	Very important	Very important	Major effect	Major effect	Major effect	Minor effect	Moderate effect	Moderate effect	Very important
Freedom for Drivers Foundation	Important	Not at all important	No effect	No effect	No effect	No effect	No effect	No effect	Important
London Living Streets	Very important	Very important	Major effect	Minor effect	Minor effect	Major effect	Major effect	Major effect	No opinion
RAC Motoring Services	Fairly important	Slightly important	Minor effect	No effect	Moderate effect	Moderate effect	Moderate effect	No effect	Very important
Railfuture	Very important	Very important	No effect	No effect	No effect	No effect	No effect	No effect	Important
Road Danger Reduction Forum	Very important	Very important	Minor effect	Minor effect	Major effect	Minor effect	Minor effect	Minor effect	Important
ASSTC CIO (all souls serve the city)	Not at all important	Slightly important	Minor effect	Moderate effect	No effect	Don't know	No effect	Minor effect	Very important
Brotherhood of the Cross and Star Church	Very important	Fairly important	Major effect	Major effect	No effect	Major effect	No effect	Minor effect	Very important
City Temple URC	Important	Fairly important	No effect	Major effect	No effect	Major effect	No effect	No effect	Very important
Eleventh Church of Christ, Scientist, London	Very important	Very important	Moderate effect	Major effect	Moderate effect	Minor effect	Major effect	Minor effect	Very important
Kingdom Faith Church Trust	Slightly important	Slightly important	No effect	Moderate effect	No effect	Major effect	Moderate effect	No effect	Very important
Mandarin Evangelical Church London	Very important	Fairly important	Moderate effect	Major effect	Major effect	No effect	Moderate effect	Moderate effect	Not all important
Notre Dame de France RC church	Important	Important	Major effect	Major effect	No effect	Moderate effect	No effect	No effect	No opinion
as Rector of St James Roman Catholic Church, G	Important	Not at all important	No effect	Major effect	No effect	No effect	No effect	No effect	Not all important
St Olave Hart Street	Important	Important	Moderate effect	Minor effect	Major effect	Major effect	No effect	No effect	Very important
The Chapter of Southwark Cathedral	Fairly important	Fairly important	Moderate effect	Minor effect	Minor effect	Moderate effect	Minor effect	Minor effect	Very important

[illegible]