

MD2883 Appendix 4

Sunday charging hours: review of proposed recommendation

10 December 2021

1. Purpose of the note

Following a briefing on the outcome of the public consultation on new Congestion Charge proposals, the Mayor asked TfL to carry out an additional review of the proposed Sunday charging hours and whether a later start time of 13:00 would be justified in light of stakeholder feedback.

Concerns around charging hours beginning at noon on Sundays were raised in particular by faith groups, churches and other religious organisations based in the Congestion Charging Zone (CCZ) who run services and other events on Sundays.

2. Summary of stakeholder feedback regarding Sunday charging hours

18 responses were received from faith and religious groups to the consultation. This included one response received on behalf of nine churches in the Westminster area.

Out of the faith groups who responded, 11 opposed charging on Sundays or at the weekend entirely and eight suggested alternative charging hours.

The main concerns around Sunday charging (hours) raised by faith groups were the potential negative impacts on their organisations and congregations, especially older and disabled people and those on low incomes. The key potential impacts raised were:

- Additional cost for those continuing to drive to attend services and activities which do not finish in time for people to drive out of the zone before charging hours commence
- People being unable to continue to attend services and activities
- Reduced size of congregations leading to lower financial support for faith groups and associated community and outreach services

There was not an agreed view from stakeholders on what an appropriate later start time would be. A number of alternatives were suggested including charging hours commencing at 13:00, 14:00 or 15:00. These are times when traffic levels are high and the largest increases in entries to the zone have already occurred.

Further detail on the issues raised and our responses, including consideration of mitigations such as discounts and exemptions that may be available to those who still need to travel by car, can be found in the Appendix to this note and in Chapter 5 of the Report to the Mayor.

3. Basis for current Sunday charging proposal

Prior to the introduction of the temporary changes to the Congestion Charge in June 2020 in response to the transport challenges of the Covid-19 pandemic, the scheme charging days were Monday to Friday; there was no charge on Saturday and Sunday. As the changes introduced in 2020, including weekend charging, are of a temporary nature and implemented in the context of

exceptional travel circumstances, we have used the 2019 scheme and traffic data as the baseline to develop the proposals and to assess their potential impacts.

The central aim of the Mayor's Transport Strategy (MTS) is for 80 per cent of all trips in London to be made on foot, cycle or public transport by 2041. The strategy sets out the fundamental importance of efficient movement of traffic in central London to support more reliable bus journeys, efficient freight trips and higher levels of walking and cycling.

The MTS highlighted that 15 years after the introduction of the Congestion Charging Scheme, while the Scheme remained an integral part of managing road space, the challenges facing central London had changed. It emphasised the changing composition of vehicles in the CCZ and the times in which they entered, highlighting that weekend traffic levels in the CCZ had become similar to levels on weekdays.

Prior to the Covid-19 pandemic, car traffic (including private hire vehicles (PHVs)) 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.

On weekdays, charging hours start at 07:00 as traffic increases, but before it reaches its daytime peak. At weekends, car and PHV activity in the CCZ builds up more slowly and reaches the level at which charging hours start during the week later in the day, around 10:00 (Figure 1).

Figure 1: Car and PHV activity in the CCZ

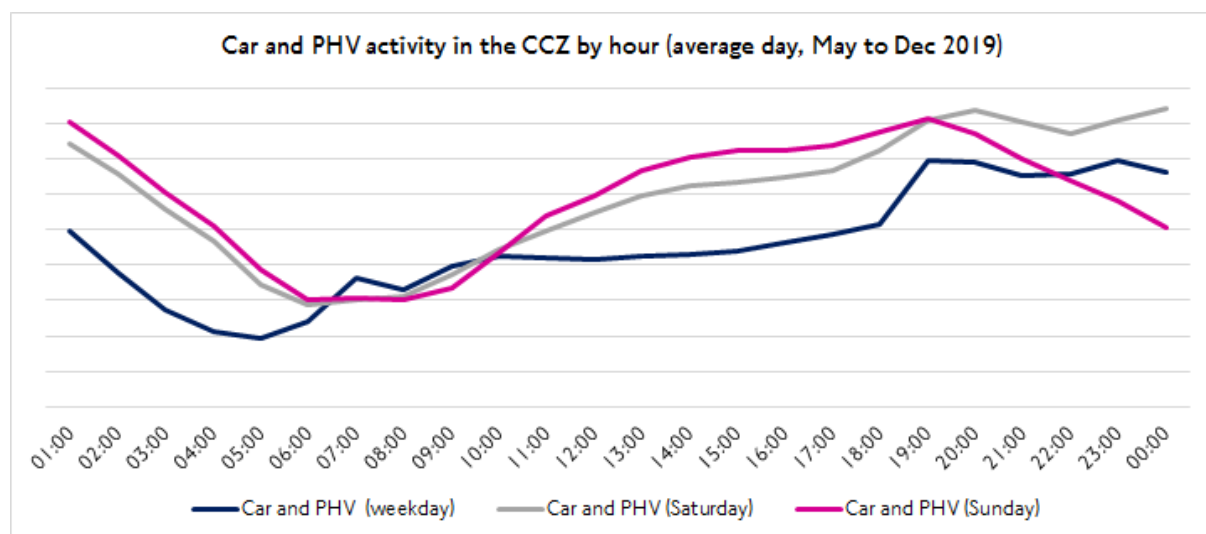
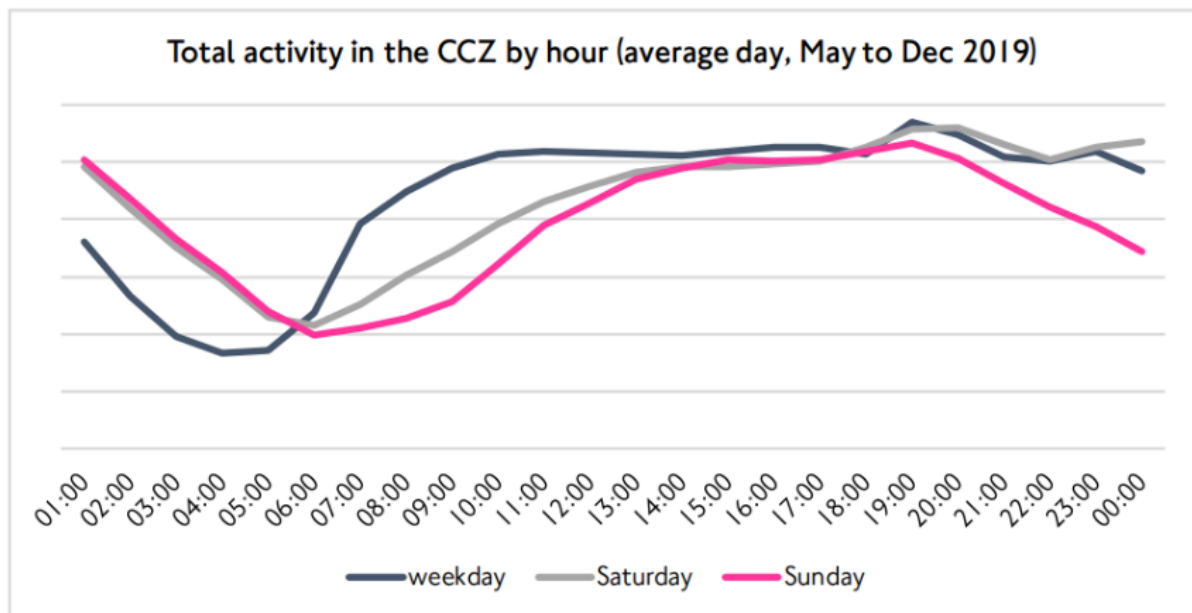


Figure 2 shows total activity¹ in the CCZ is lower during weekend mornings compared to weekdays. Again, total activity builds up more slowly and reaches the levels at which charging hours start during the week by around 11:00. Given the overall lower traffic levels, the different types of journey (including those travelling to church services on Sunday mornings) and the fact that higher levels of traffic are observed later, we have proposed a later start time of 12:00 on Saturdays and Sundays. Like weekday charging hours, this introduces charging as traffic increases, but before it reaches its daytime peak. The 12:00 start to charging hours has been identified as being a point at which traffic is increasing quickly and can be deterred, preventing it from reaching previous high levels.

¹ Activity refers to total Automatic Number Plate Recognition (ANPR) camera captures which act as a proxy for total vehicle movement/traffic

Figure 2: Total activity by hour on Saturdays, Sundays and average weekday in CCZ



For clarity and ease of customer understanding, it is preferable to have consistent charging hours on Saturdays and Sundays. Having three different sets of charging hours across the week would increase the complexity of the scheme for users as well as the volume of information motorists would need to absorb from signage in and around the zone. Introducing differential charging hours across the weekend would add further operational complexity and signage issues. It could potentially delay implementation of new charging hours, which would disbenefit those travelling on weekend mornings from the current proposed implementation date.

If charging hours were to commence later on Saturdays and Sundays, traffic benefits of charging between 12:00 and 13:00 while traffic is still increasing, would be lost on both days.

The current proposed later start to weekend charging hours (compared to weekdays) will help mitigate the impact on some individuals, including, potentially, churchgoers on Sunday mornings, while tackling traffic and congestion during the busiest part of the day. Shorter hours of operation at the weekend could also help to support trips that have a positive impact on London's weekend economy.

This is consistent with the analysis put forward in the Report to the Mayor.

4. Conclusion

Having reviewed the traffic data and responses from stakeholders, it remains our view that it is crucial to tackle high traffic levels on Sundays to achieve MTS objectives. Looking at the traffic profile over the day, the data supports the original recommendation of Sunday charging hours being from 12:00 to 18:00.

This is consistent with the approach taken in respect of weekday charging; it introduces charging before traffic reaches its highest levels, and when traffic is at similar levels to those seen during the start of weekday charging hours (in fact this level is reached by around 11:00; by 12:00 total activity

is slightly higher than 7am on weekdays, but we would expect weekend activity to reduce once those hours are also charged).

This will help to ensure the effectiveness of the charge at weekends when traffic is at its highest. Shorter charging hours compared to weekdays will also provide an important mitigation to those who need or want to make trips into the zone at weekends, including to church services, who can do so in the morning without attracting a charge, due to their lesser impact on traffic and congestion.

Those who choose or need to attend later services have a number of travel options, including paying the Congestion Charge. Other mitigations include the discounts and exemptions which are offered as part of the scheme and other travel options including the extensive public transport network and travel concessions.

A later start to charging hours, or charge free day on Sundays would be detrimental to our efforts to ensure the Congestion Charging Scheme remains effective in achieving its primary objective of reducing traffic and congestion in the CCZ to deliver the aims of the MTS.

The recommendation for charging hours of 12:00 to 18:00 at weekends is based on our assessment of ensuring the benefits of the scheme can be realised while offering some mitigation.

Appendix A – Review of issues raised by stakeholders and our responses regarding Sunday charging hours

18 responses were received from faith and religious groups to the consultation including one response received on behalf of nine churches in the Westminster area. Several of these churches also responded individually. In addition, we held a meeting with representatives from 11 faith organisations, eight of which also responded to the consultation in writing (either independently, as a co-signatory on the ‘Nine Churches’ letter, or both).

Written responses were received from the following faith groups: All Souls Serve the City; Bermondsey Central Hall Methodist Church; the Brotherhood of the Cross and Star; City Temple; Churches Together in Westminster; Diocese of London; Eleventh Church of Christ, Scientist; The Guild of St Bride’s; Hinde St Methodist Church; Kingdom Faith Church Trust¹; Mandarin Evangelical Church, Metropolitan Tabernacle (Baptist Church); Nine Churches in the Westminster area (Methodist Central Hall, Emmanuel Church, Kingdom Faith Church, Westminster Chapel, St James the Less, The Redeemed Christian Church of God, St Etheldreda’s Church, Christchurch Mayfair, Emmanuel Chinese Church); Notre Dame de France RC Church; The Chapter of Southwark Cathedral; St James Spanish Place; St Olave’s; St Peter’s Italian Church; Westminster Chapel¹ (and the Gate Pregnancy Centre which is based at the chapel) (a ¹ indicates that a separate response was received alongside being a signatory to the ‘Nine Churches’ letter).

A meeting with TfL was also held on 14 October 2021 that was attended by representatives from: Bevis Marks Synagogue, Christ Church Mayfair, Churches Together Westminster, Emmanuel Chinese Church*, Emmanuel Church Westminster*, Grace London, Kingdom Faith*, Methodist Central Hall*, Redeemed Church of God*, St Etheldreda’s Church*, Westminster Chapel* (an asterisk indicates that the organisation was also included in the ‘Nine Churches letter’ which was a collective response).

Issue raised: There should be no charge at the weekend or on Sundays

Out of the faith groups who responded, 11 opposed charging on Sundays or at the weekend entirely.

TfL response: Section 3 of this note sets out weekend traffic patterns compared to weekdays and highlights that the MTS identified weekend traffic levels in the CCZ as a particular challenge.

Introducing charging at weekends, including Sundays, is therefore necessary to ensure the Congestion Charge remains effective in achieving its primary objective of reducing traffic and congestion in the CCZ. This is consistent with Proposal 20 of the MTS which commits the Mayor and us to keeping the Congestion Charging Scheme under review in order to ensure that it remains fit for purpose:

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.

Issue raised: Charging hours should start later on a Sunday

Out of the faith groups who responded, eight suggested alternative charging hours. A start time of 13:00 was suggested five times; 14:00 three times; and 15:00 once.²

² Note that one respondent suggested more than one alternative start time.

A start time of 12:00 was proposed as it reflects levels of activity and different patterns and journey purposes that are seen on Saturdays and Sundays compared to weekdays such as a reduction in the level of commuting and more leisure travel and travel for shopping and personal business.

TfL response: We have assessed traffic data to evaluate the suggested later start times, though as stated above, total activity at 12:00 on Sundays is aligned with the level of traffic that necessitates the introduction of charging on weekdays.

Traffic data is captured in hourly intervals. On Sundays, in the hour from 12:00 – 13:00 car and PHV entries to the CCZ increase by 10 per cent on the entries in the preceding hour (between 11:00 and 12:00). In the hour between 13:00 and 14:00, the rate of increase reduces to five per cent for cars and PHVs.

The rate of increase seen in the hour 12:00 – 13:00 is greater than between any other period covered by the proposed charging hours. Benefits of commencing charging hours while traffic is rising steeply are greater than later in the day when more vehicles have already entered the zone. Starting charging at 12:00 when traffic is at the same level as it is during the start of weekday charging hours, and when entries are increasing at a faster rate than later in the day, ensures the peak increase in activity during the proposed hours is captured. A later start would miss the opportunity to influence drivers entering the CCZ during this time and limits our ability to reduce overall levels of traffic within the CCZ during the busiest part of the day.

Issue raised: Potential negative impacts on those attending religious services and social, leisure, fundraising and charitable activities by faith groups

The main concerns around Sunday charging (hours) raised by faith groups were the potential negative impacts on their organisations and congregations, especially older and disabled people and those on low incomes. The key potential impacts raised were:

- Additional cost for those continuing to drive to attend services and activities which do not finish in time for people to drive out of the zone before charging hours commence
- People being unable to continue to attend services and activities
- Reduced size of congregations leading to lower financial support for faith groups and associated community and outreach services

TfL response: The potential impact on faith groups from the proposed changes was considered by the independent transport consultants Jacobs, who were commissioned to undertake an Integrated Impact Assessment (IIA). The IIA includes an Equality Impact Assessment (EqIA) which is relevant to the discharge of our Public Sector Equality Duty under the Equality Act. The EqIA assessed the potential impact across all protected characteristics (including religion or belief), as defined by the Equality Act, alongside an additional assessment of the potential impacts on low-income households.

It recognised that there would be an increased cost to travel to services as a consequence of weekend charging (principally but not only Sundays) and assessed this as a minor negative impact which would likely be short-term. This is because people would be likely to adjust their travel behaviour so that they avoided the charge, for example by using public transport instead. Additionally, some churches and other places of worship could alter the hours of services in order to accommodate trips within non-charging hours. At the weekends the non-charged period is longer than during the week, offering more opportunity to re-time activities. We appreciate that altering the hours of service is not a viable alternative for all churches and places of worship, as raised by stakeholders during the consultation. However, there are other mitigations in place.

These mitigations include the 100 per cent blue badge discount, which can be applied to up to two vehicles per day, neither of which needs to be owned by the blue badge holder, and the exemption for disabled tax class vehicles. The 90 per cent residents' discount and the Cleaner Vehicle Discount may also be available for some people driving at the weekend during charging hours. For people without access to a car, all taxis and wheelchair accessible PHVs are exempt from the Congestion Charge as are vehicles with nine or more seats, for example, minibuses used by community or church organisations.

In addition, there is an extensive public transport network that is available in central London, and which 90 per cent of people travelling to central London use. For older and disabled people, there are some passes that provide for reduced or free public transport into and within London at all times at the weekend, such as the Freedom Pass and English National Concessionary Pass for people outside of London, and the Senior and Disabled Persons railcards.

Car ownership is low for the lowest income households in London. Table 1 shows the proportion of London households with income up to £35,000 per year that do not have access to a car.

Table 1: Proportion of London households in different income bands with no access to a car

	<£10k	£10-£20k	£20-35k
Central	94%	74%	53%
Inner	80%	71%	60%
Outer	68%	48%	28%

The proposed changes have been identified as having a small negative impact on faith groups' fundraising activities at weekends. It would be challenging to define a bespoke exemption to mitigate this that would not further undermine the benefits of the scheme in reducing traffic and supporting delivery of the MTS.