



Proposed changes to increase the penalty charge for drivers

Consultation Report
December 2017

MAYOR OF LONDON



**TRANSPORT
FOR LONDON**
EVERY JOURNEY MATTERS

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Executive summary

We developed a proposal to increase the cost of Penalty Charge Notices (PCN) for contraventions of the Transport for London (TfL) Red Route network and Congestion Charging zone. The proposal was intended to address an increase in the number of contraventions of the rules of the; red route network and the Congestion Charging zone. These contraventions can cause congestion, which in turn delays journeys and can prevent businesses from operating efficiently, damaging the potential for economic growth or the creation of new jobs in our city.

We held a 10 week consultation on our proposals, which ran from 4 September – 10 November 2017, and we invited everyone with an interest across London to reply.

Summary of results

We received **7,411¹** responses to our consultation in total.

Respondents who visited our online consultation 'portal' were asked to complete a questionnaire which sought views on:

- Alternative options might be available and which could address the increase in the number of contraventions of the Red Route network or Congestion Charging zone
- Any hardships that our proposals might cause to any particular road user or group of users
- Any other comments about our proposals

We also asked respondents for their postcode so that we could plot respondents to our consultation on a map, and additionally how they had heard about our proposals and what they thought about the quality of our consultation.

We identified around 150 separate issues which respondents had raised in their written comments to us. There were a number of common themes within these issues raised and we found that all of the issues could be categorised according to the following:

- 'In-principle views' – comments opposing or supporting the proposed increase in principle, or providing some additional context for these views
- 'Alternative suggestions to increase compliance' - suggestions for alternative methods which respondents felt TfL should consider instead of increasing the cost of PCNs
- 'Hardships caused by the proposals' - Comments relating to the potential hardships that might be caused to road users should the cost of TfL PCNs be increased

¹ This excludes four duplicate responses we received.

- ‘General comments’ - A range of comments which did not relate specifically to the proposals, for example about the use made of the road network by various users, or about road infrastructure projects or policies

Structure of this report

Chapter 1 of this Consultation Report summarises our proposals to increase the cost of PCNs for Red Route and Congestion Charging contraventions.

Chapter 2 explains in detail how the consultation was carried out, including how it was publicised and what channels were available for responses.

Chapters 3 - 4 provide a detailed statistical and thematic analysis of the responses to the consultation.

Finally, chapter 5 provides our response to each of the issues raised.

We have also included a range of Appendices to support this report.

Next steps

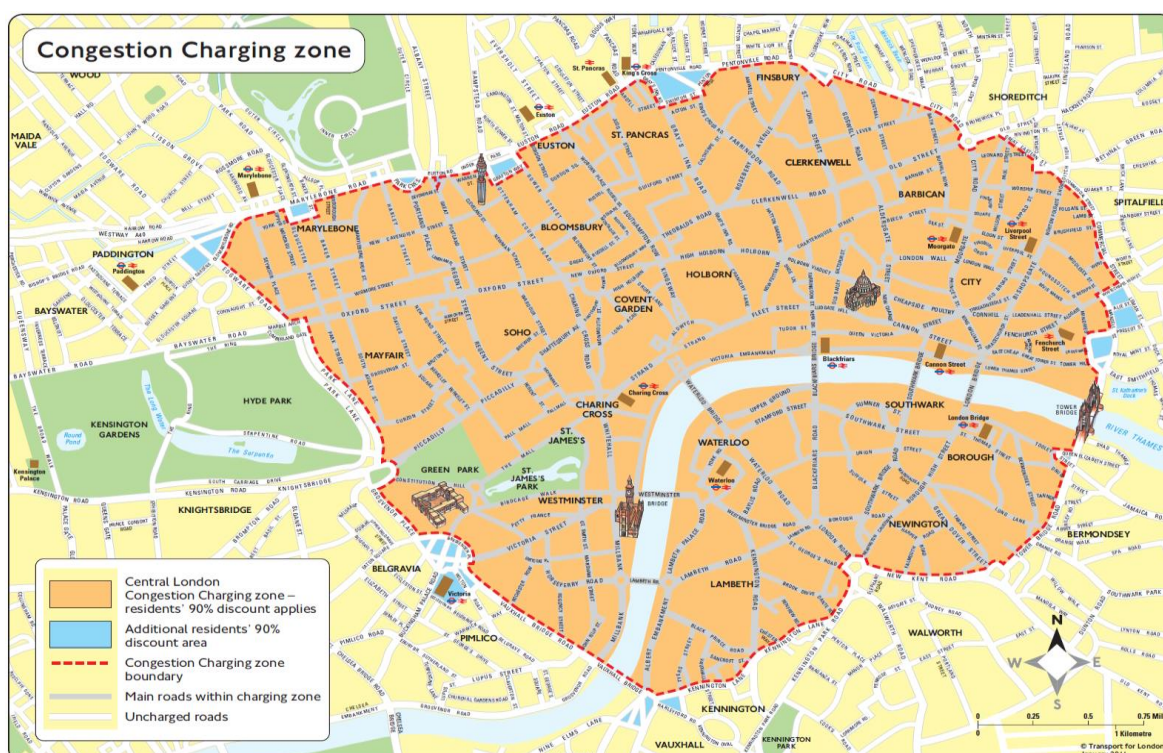
The information contained in this report has been presented to the Mayor, who will use it to decide whether or not to increase the cost of a PCN. Should the Mayor decide to increase the cost of PCNs issued for contraventions of the rules of the red route network, he must notify the Secretary of State for Transport, who may object if he considers them to be excessive. If he does so, the increased level may not be introduced until the Secretary of State withdraws this objection. The Secretary of State must exercise his reserve powers within 28 days of being notified. The Secretary of State does not have the same power of veto over the level of PCNs issued in respect of non-payment of the Congestion Charge.

1. About the proposals

1.1 Introduction

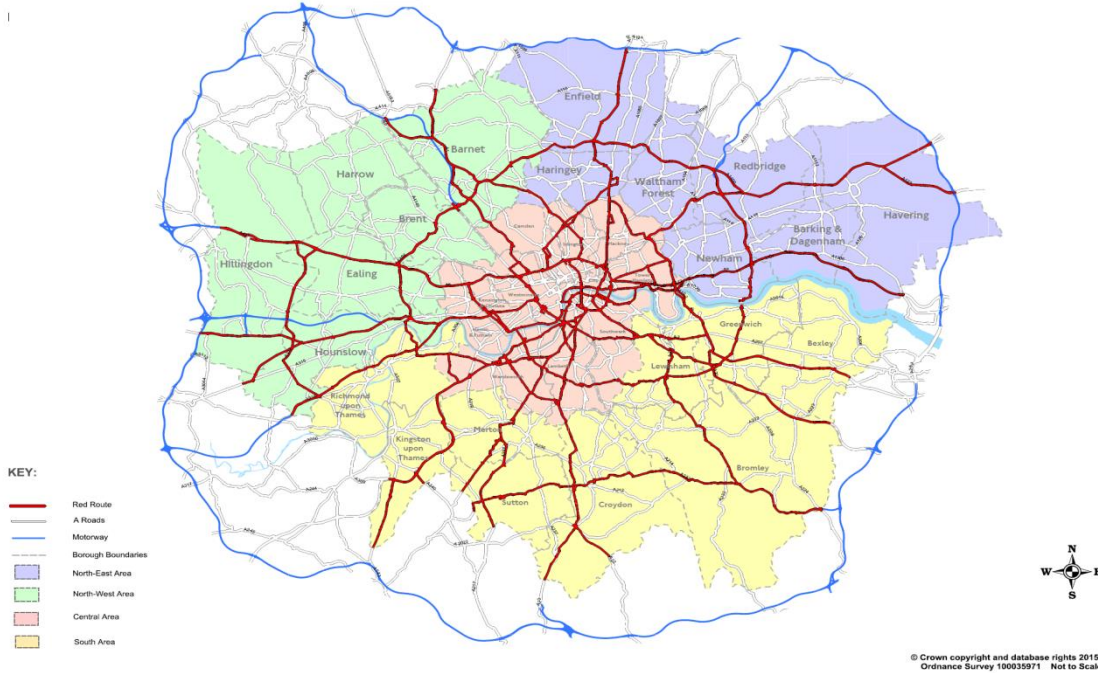
TfL is responsible for managing both the Congestion Charging zone and London's network of 'red routes'. London's Local Authorities are responsible for managing the remainder of our city's roads.

The Congestion Charging zone is an area of central London where it is necessary to pay the Congestion Charge in order to drive a vehicle from 07:00 – 18:00, Monday to Friday. The map below shows the extent of the zone:



If we detect a vehicle within the zone which does not pay the charge by midnight the following charging day, and which is not exempt or does not have a valid discount in place, we will issue a PCN to the registered 'keeper' of that vehicle. The current cost of a PCN is £130, although a 50 per cent discount applies if it is paid within 14 days, reducing the cost to £65. If the PCN is not paid or challenged within 28 days, the cost increases to £195.

The red routes are a network of strategic roads in London which carry 30 per cent of London's traffic, but which make up only five per cent of the city's roads. On average, each of London's red routes carries 50,000 vehicles per day. This is two and a half times the volume of traffic carried on key A roads managed by London's Local Authorities. The map below shows the extent of the network:



Our priority in managing London's red routes is to keep traffic moving. To this end, restrictions on the red route network are designed to discourage stopping or parking where it would be dangerous or disruptive to other road users. For example, it is not permitted to park or stop on a double-red line at any time or on a single-red line at certain times (although vehicles displaying a Blue Badge can stop to set down or pick up the holder of the Blue Badge). It is also not permitted for anyone to stop in a yellow box junction or drive in a bus lane during its hours of operation.

If we detect a vehicle stopping or parking illegally on the red route network, we will issue a PCN. The cost of a PCN for a contravention of the red route network is the same as for failing to pay the Congestion Charge.

1.2 Purpose

London's roads are vital in supporting our city and allowing it to function. They enable people to travel, including by bus or cycle, and they support trade and employment in our city. They link our communities and have a significant effect on our quality of life. Traffic congestion on our roads harms our environment, making our communities less pleasant places to be. It affects the quality of our air and can impede economic growth. It is in everyone's interest that our roads function efficiently and that traffic is kept moving smoothly.

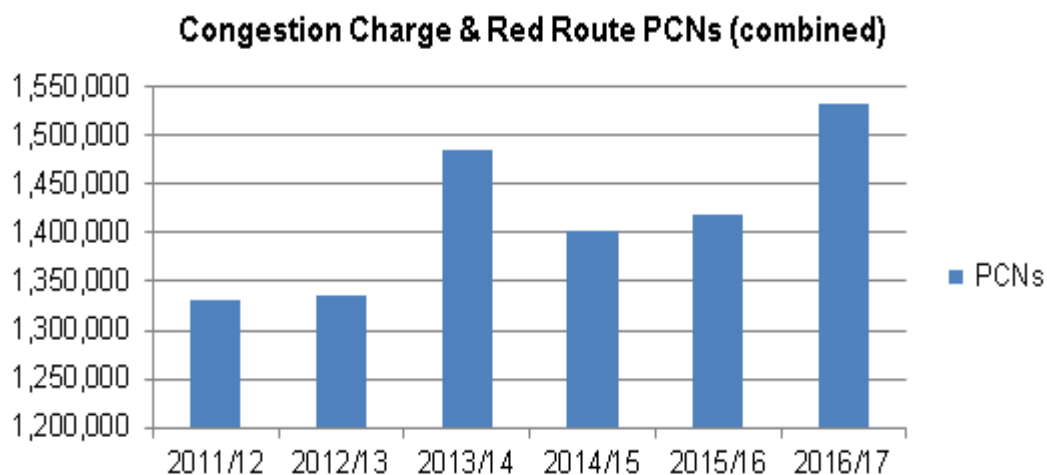
One tool at our disposal to keep traffic moving is to issue Penalty Charge Notices (PCN) for 'contraventions' of the Red Route network (ie. those roads we manage) or Congestion Charging zone. Doing so encourages road users to drive responsibly, to

the benefit of everyone. We invest every penny we raise from issuing PCNs back into London's road and public transport network.

To help keep our roads moving and as part of the Mayor's vision to make streets safer and more welcoming for pedestrians and cyclists, we have developed a proposal to increase the cost of a PCN. This will ensure it remains an effective deterrent, including against poor or inconsiderate driving which can cause delays and make our streets less safe.

1.3 Detailed description

The cost of a PCN for failing to pay the Congestion Charge has remained unchanged for four years. The cost of a PCN for contraventions of the red route network has stayed the same since 2011. Over the last few years however, there have been an increasing number of contraventions of the rules of the red route network and the Congestion Charging zone. It has therefore been necessary for us to issue an increasing number of PCNs, as shown in the chart below:



We proposed increasing the cost of a PCN both for failing to pay the Congestion Charge and contravening of the rules of the red route network.

We proposed that the cost of a PCN should be increased to £160, an increase of £30. The opportunity to pay the PCN at a 50 per cent discount within 14 days will remain in place, with a discount to £80. Should the PCN not be paid or challenged within 28 days, the cost would increase to £240.

2. About the consultation

2.1 Purpose

The objectives of the consultation were:

- To give stakeholders and the public easily-understandable information about the proposals and allow them to respond
- To allow respondents to suggest alternatives to our proposals which we may not have been aware of
- To understand any particular hardships or other issues which might be caused by the proposals of which we were not previously aware
- To understand concerns, objections and any other issue

2.2 Potential outcomes

The potential outcomes of the consultation were:

- Following careful consideration of the consultation responses, the Mayor decides to proceed with the scheme as set out in the consultation
- Following careful consideration by the Mayor of the consultation responses, and subsequent direction to do so from him, we modify the proposals in response to issues raised and proceed with a revised scheme
- Following careful consideration of the consultation responses, the Mayor decides not to proceed with the scheme

2.4 Who we consulted

We sought the views of anyone who uses the London road network or who might consider themselves to be affected by our proposals. We designed a campaign to publicise the consultation that we considered would have as wide a reach as possible, within reasonable budgetary constraints.

In developing our consultation we were mindful of all our statutory duties. For example TfL must consult on any variations to the Congestion Charging scheme. The previous Mayor issued statutory guidance to TfL detailing consultation practice, entitled “Guidance from the Mayor of London on charging schemes pursuant to schedule 23 of the Greater London Authority Act 1999”.

Schedule 9 of the Traffic Management Act 2004, details the procedure which applies to varying the level of a PCN issued for contravening the rules of the TLRN. Both the Mayors statutory guidance and the Traffic Management Act 2004 informed our approach to the consultation.

2.5 Dates and duration

The consultation ran for 10 weeks from 4 September – 10 November 2017. We considered that this was sufficient for respondents to consider our proposals and submit their view. This timeframe additionally accorded fully with published Mayoral guidance² on requirements for consultation on proposed changes to the Congestion Charging zone.

2.6 What we asked

Our online consultation ‘portal’ included a questionnaire which respondents were asked to consider and complete. Respondents were also free to submit their views in writing by email or post.

Our questionnaire consisted of three open questions and two closed questions. Respondents were additionally asked to provide their name and postcode and, if relevant, the name of any stakeholder organisation or business they were representing in submitting a response.

The three open questions asked respondents for their views on:

- Alternative options which might be available and which could address the increase in the number of contraventions of the Red Route network or Congestion Charging zone
- Any hardships that our proposals might cause to any particular road user or group of users
- Any other comments about our proposals.

The two closed questions asked respondents:

- How they had heard about the consultation, selecting from five options (or recording free text comments if none of these were applicable)
- What they felt about the quality of the consultation itself, selecting from five options

A copy of our consultation questionnaire is included in Appendix A.

² For details see ‘GUIDANCE FROM THE MAYOR OF LONDON TO TRANSPORT FOR LONDON ON CHARGING SCHEMES PURSUANT TO SCHEDULE 23 OF THE GREATER LONDON AUTHORITY ACT 1999’

2.7 Methods of responding

Respondents were able to submit their response to the questions through the following channels:

- By completing an online questionnaire available via www.tfl.gov.uk/penalty-charge
- By email to consultations@tfl.gov.uk
- In writing to Freepost TfL Consultations

2.8 Consultation materials and publicity

Our consultation materials were available online at www.tfl.gov.uk/penalty-charge and were comprised of the following:

- Written information which explained our proposals and the reasons for them in summary form
- An Impact Assessment, which explained the impacts arising from our proposals
- A 'Variation Order', which; if confirmed by the Mayor, would enable TfL to increase the cost of PCNs as proposed.

This information was additionally available to inspect in person at our offices³ during normal office hours. The consultation materials are included in Appendix A.

The consultation was publicised through a public and stakeholder email campaign, advertisements and statutory notices in the press, and through a TfL Press Release.

2.8.1 Email campaigns

We designed two email campaigns to publicise the consultation. Both were intended to inform recipients of our proposals and invite them to submit their comments to us.

Public campaign

From the start of our consultation on 4 September, we sent emails to 517,095 recipients who had registered with us to receive updates from us about driving in London.

A copy of our email to these recipients is included in Appendix A.

Stakeholder campaign

At the start of our consultation on 4 September, we sent an email to 1419 recipients at a range of stakeholder organisations. These included all of London's boroughs,

³ These offices were Transport for London, Palestra, 197 Blackfriars Road, Southwark, SE1 8NJ

Assembly Members and Members of Parliament, transport groups, disabled persons groups and businesses, amongst others.

A copy of our email and a list of the stakeholder organisations who received it are included in Appendix A.

2.8.5 Advertising and statutory notices

We promoted the consultation through advertising in a range of London-wide press titles, and additional a number of driving-related trade titles. As required by published Mayoral guidance⁴, we additionally gave notice in the London Gazette that we had made an order under schedule 23 to the Greater London Authority Act 1999, to vary the Congestion Charging scheme. Copies of our advertisement and notice are included in Appendix A. The table below lists the titles which carried our advertisement or notice, and the dates that these appeared.

Title	Nature of insert	Date appeared
Truck & Driver	Advertisement	10 October 2017
Bus & Coach buyer	Advertisement	3 November 2017
Business car	Advertisement	3 October 2017
What Van?	Advertisement	25 October 2017
Fleet World	Advertisement	13 October 2017
Evening Standard	Advertisement	7 September 2017
Metro London	Advertisement	12 September 2017
City AM	Advertisement	18 September 2017 & 25 September 2017
London Gazette	Statutory Notice	4 September 2017

2.8.6 PR & Social media

TfL issued a Press Release to a range of relevant media prior to the launch of our consultation on 4 September 2017. A copy of our Press Release is included in Appendix A.

We promoted our consultation through Twitter at various points through the consultation.

⁴ For details see 'GUIDANCE FROM THE MAYOR OF LONDON TO TRANSPORT FOR LONDON ON CHARGING SCHEMES PURSUANT TO SCHEDULE 23 OF THE GREATER LONDON AUTHORITY ACT 1999'



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We're consulting on proposals to increase the cost of a Penalty Charge Notice to £160. Closes on 10 Nov 2017. Info: consultations.tfl.gov.uk/general/penalt...

6:00 am - 5 Nov 2017

2.8.7 Digital advertising

We created an animated display which was designed to catch browsers' attention and direct them to our online consultation portal. The display was targeted to appear automatically on websites considered to be of interest to members of the public who would additionally have an interest in driving in London.

2.8.8 Stakeholder engagement and 'third party' publicity

The public consultation was supplemented by engagement with stakeholders. This was to ensure that stakeholders were well briefed about the potential timetable for the proposed changes, to understand their issues and concerns, and to encourage participation in the consultation.

A number of stakeholder organisations supplemented our own publicity of the consultation with activity of their own, principally through Twitter. We have included in Appendix A some examples of this 'third party' publicity, for which we were very grateful.

2.9 Equalities Assessment

We undertook an Equalities Assessment of our consultation in advance of its launch to ensure that it would be participative as possible. We took the following actions in conducting our consultation to ensure that everyone who had a view could share it with us:

- Publishing an Impacts Assessment as part of our consultation, to outline our thoughts on what impacts our proposal might cause
- Publicising the opportunity to take part in the consultation in a variety of ways, including through an advertising campaign in the London-wide press
- Providing our consultation materials on-line at tfl.gov.uk/penalty-charge and inviting potential respondents to view them in person at our offices

2.10 Analysis of consultation responses

We appointed WSP to undertake analysis of the written comments provided by respondents to our consultation, and additionally to undertake statistical and geographical analysis of respondents to the consultation.

All responses to the consultation were inputted to our online consultation 'portal' either directly by each respondent or, in the case of responses received by letter or email, by TfL staff.

Each week, we provided WSP with the output from our consultation 'portal' so that the issues raised by respondents could be analysed. All personal data (names, email addresses, IP addresses, etc) was removed from the output prior to sending.

WSP produced a 'code frame' which listed every issue raised by respondents to the consultation. The code frame was initially built based on a review of the first 200 responses to the consultation by senior WSP managers, to establish a framework for consistent 'coding' of the remaining responses. As each subsequent response to the consultation was analysed, the issues raised were either mapped to an existing code or, where a new issue was identified, a new code would be created.

As WSP's coding continued, senior managers would undertake a check of 15 per cent of the 'coded' responses chosen randomly, to ensure consistency in coding.

3. About the respondents

This section explains how replied to our consultation, what methods they choose to submit their views and how they had heard about our consultation.

3.1 Number of respondents

The following table shows the number of responses to the consultation which we received from the public and from organisations or individuals we judged to be stakeholders⁵.

Respondents	Total	%
Public responses	7390	99.7
Stakeholder responses	21	0.3
Total	7411	100

3.2 How respondents heard about the consultation

We asked respondents how they had heard about the consultation, and provided a range of potential options. Our findings are shown in the following table and chart.

How respondents heard	Total	%
Read about in the press	216	2.9
Received a letter from TFL	23	0.3
Received an email from TFL	5704	77.0
Saw it on the TFL Website	177	2.4
Social Media	212	2.9
Other ⁶	152	2.1
Not Answered	927	12.5

⁵ We identified as a 'stakeholder' those respondents who, in our judgement, are notable as they are reasonably well known amongst the public. This includes London's local authorities, Members of Parliament or Assembly Members, major transport groups, Trades Unions, local neighbourhood or residents associations, major charities, etc.

⁶ Respondents who selected this option could specify what channel had alerted them to our consultation in free text.

3.3 Methods of responding

The following table shows how respondents choose to submit a response to our consultation.

Methods of responding	Total	%
Website	6753	91.1
Email or letter	658	8.9
Total	7411	100

3.4 Postcodes of respondents

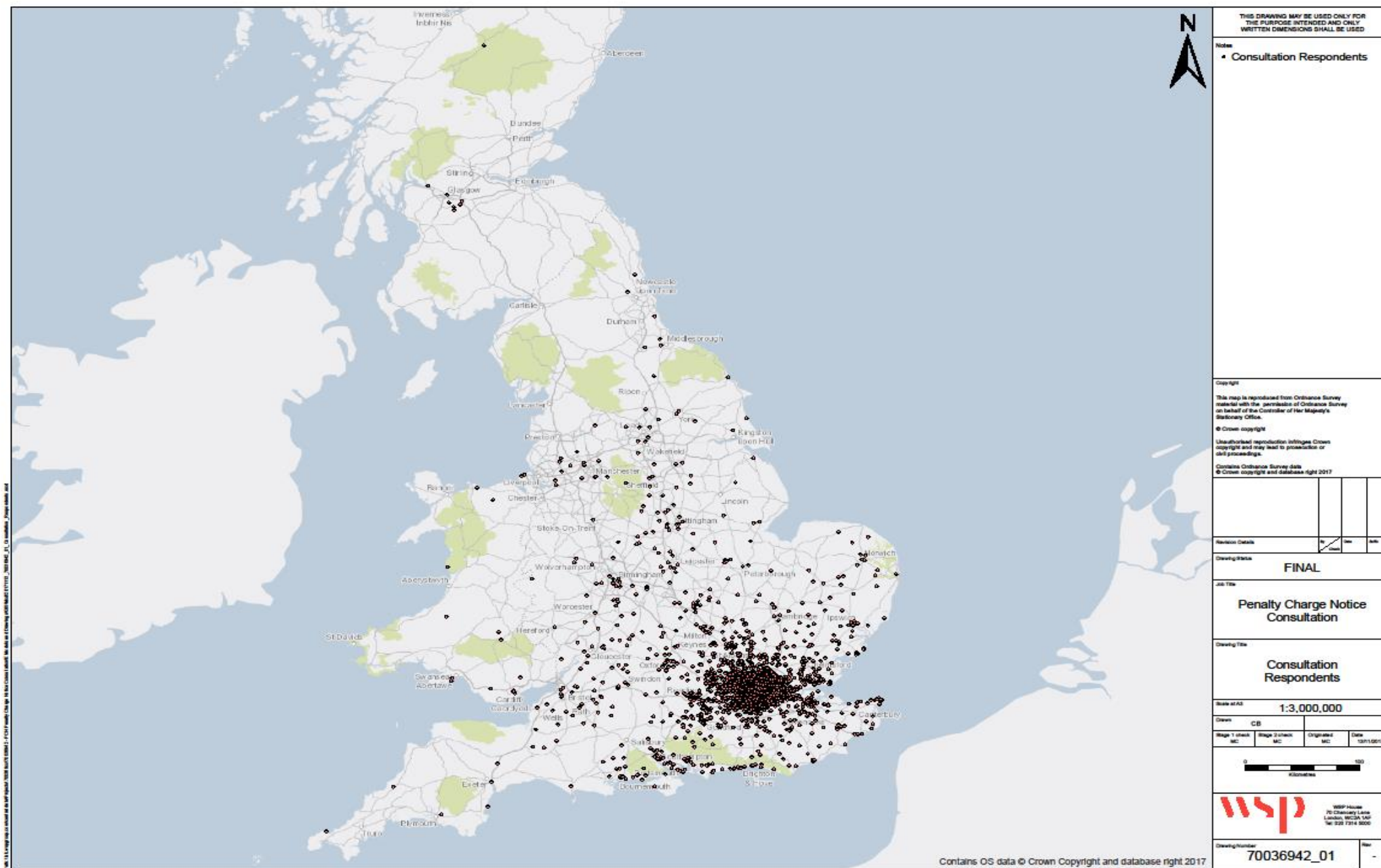
In every case where a respondent provided us with a valid postcode, we ‘plotted’ them to an originating borough or district. We received responses to the consultation from across the UK, and the table below shows the top ten most represented Local Authority areas in terms of respondents to the consultation, as well as the number of respondents either who did not provide a postcode, or provided a postcode we could not match to a Local Authority area.

Appendix B includes the complete table, accounting for all respondents to the consultation.

Postcode	Total	%
City of Westminster	270	3.6
Kensington and Chelsea	214	2.8
Southwark	207	2.7
Camden	199	2.7
Wandsworth	190	2.6
Barnet	177	2.4
Lambeth	176	2.4
Islington	173	2.4
Tower Hamlets	141	1.9
Hackney	133	1.8

3.4 Distribution of respondents across Greater London

The following maps show the location of respondents to our consultation across the UK and within London-only.





3.5 Stakeholder responses

We received 21 responses from organisations we considered to be stakeholders, as listed below. We have included in Appendix B a short summary of the response from each stakeholder.

AA

Alliance of British Drivers

British Vehicle Rental and Leasing Association

Campaign for Better Transport

Confederation of Passenger Transport

DHL

Freight Transport Association

Friends of Capital Transport Campaign

Greenwich African Caribbean Organisation

Hackney Living Streets

Heart of London Business Alliance

John Lewis

Living Streets

London Borough of Camden

London Borough of Merton

London Councils

RAC

RAC Foundation

The Soho Society

UPS

Westminster City Council

4. Summary of all consultation responses

This section describes the outcomes of the consultation, including what issues were raised by respondents. We have structured this section in the same way as our consultation questionnaire, which is included in full in Appendix A.

Respondents to our consultation raised over 150 separate issues, many of which were repeated from question to question. These are collected in a 'code frame', which lists all the issues raised and includes a count against each to indicate the frequency it was raised. We have included the complete code frame in Appendix C the complete code frame, but in each of the sub-sections below have included only the top-10 most frequently raised codes against each question in our consultation questionnaire, to avoid this section of the report becoming unwieldy.

In many cases, we found that respondents raised identical issues in each of the three open questions in our questionnaire. In each of the following tables, we include counts against each of the issues raised by respondents, to indicate how frequently it was raised. We have not attempted to sift the responses to the consultation to remove issues that were repeated from one question to another, so the counts provided in the table below should be treated with caution and may not necessarily represent individual respondents.

We respond to every issue raised by respondents to our consultation in section 5.

4.1 Summary of responses to Question 1: Do you believe that there are other, alternative options to increase compliance with the red route network and congestion charging zone?

We asked respondents whether they felt that any alternative options might be available. We have considered every issue raised, including every alternative suggestion.

We have provided below the Top 10 most frequently raised issues by respondents to question 1. We have also included a count against each issue, to indicate the frequency that it was raised by respondents.

Issue raised	Frequency
Criticism of TfL motivations for increasing charge (greed etc.)	769
Alternative suggestions to increase compliance - higher charges for repeat offenders	647
Poor road signage causes offences	552
No, will not increase compliance or change behaviour	490
Alternative suggestions to increase compliance - driver education / awareness programmes	445
No, PCN Charge should be reduced / already high	396
No, abolish the PCN charge	385
No, existing charge is adequate / no need to change	334
Alternative suggestions to increase compliance - ore traffic warden patrols	325
Yes, increase the PCN charge	265

4.2 Summary of Question 2: Would the increase in the value of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users

We asked respondents whether they felt that any proposals would cause any particular hardships, or penalise any particular group of users. We have considered every issue raised.

We have provided below the Top 10 most frequently raised issues by respondents to question 2. We have also included a count against each issue, to indicate the frequency that it was raised by respondents.

Issue raised	Frequency
No, PCN Charge should be reduced / already high	1137
Criticism of TfL motivations for increasing charge (greed etc.)	934
No, abolish the PCN charge	494
No, will not increase compliance or change behaviour	389
Poor road signage causes offences	205
No personal effect	180
Oppose PCN increase for certain user types/reasons - couriers	157
Oppose PCN increase for certain user types/reasons - disabled drivers	153
Yes, increase the PCN charge	150
Oppose PCN increase for certain user types/reasons - elderly drivers	145

4.3 Summary of Question 3: Any other comments

We gave respondents opportunity to note any other concern with our proposals. We have considered every concern raised.

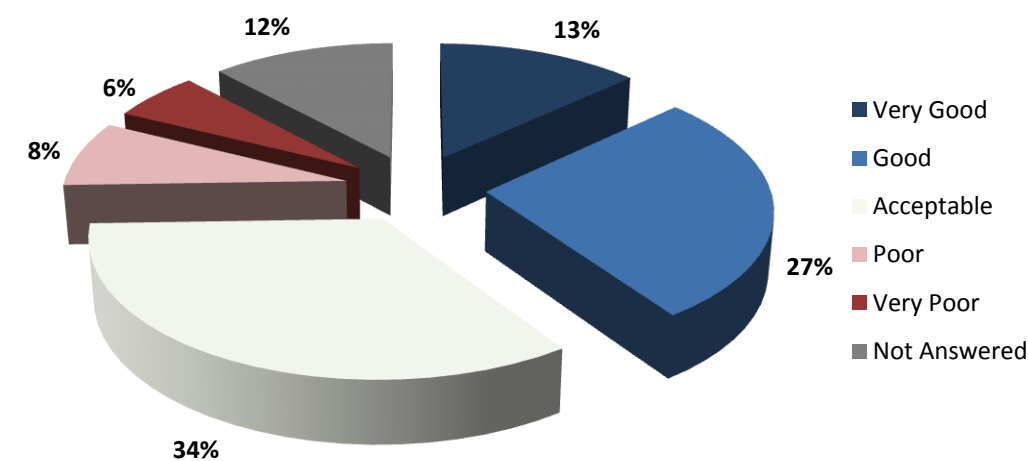
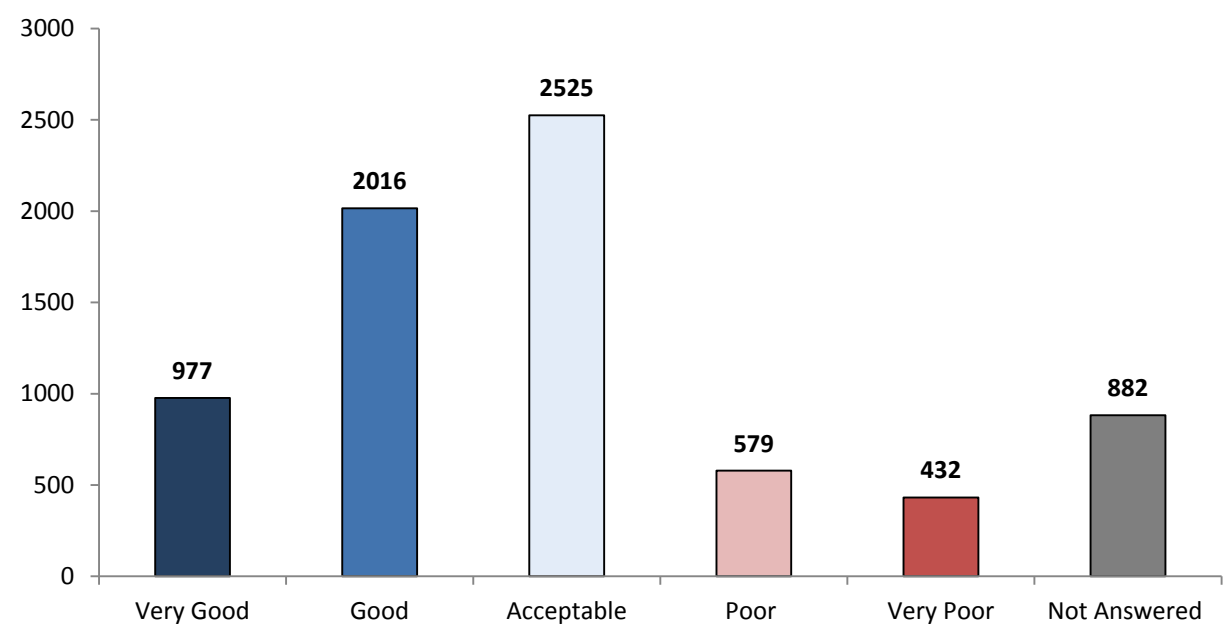
We have provided below the Top 10 most frequently raised issues by respondents to question 3. We have also included a count against each issue, to indicate the frequency that it was raised by respondents.

Issue raised	Frequency
Criticism of TfL motivations for increasing charge (greed etc.)	1627
No, PCN Charge should be reduced / already high	688
No, abolish the PCN charge	576
No, will not increase compliance or change behaviour	510
Yes, increase the PCN charge	242
Poor road signage causes offences	204
No, existing charge is adequate / no need to change	193
No, improve public transport instead	176
Poor road layout causes offences	162
Need more evidence of the impact of a PCN increase	148

4.3 Comments on the consultation

We asked respondents what they thought about the quality of our consultation, and provided five options to select from (Very good, good, acceptable, poor or very poor).

The charts below shows how respondents replied.



5. Responses to issues raised

We have carefully considered every single issue raised by respondents to our consultation. This section lists every issue raised, as well as our response to each of these.

Respondents to our consultation raised around 150 different issues. To make this section of the report as accessible as possible to readers, we have grouped these issues into four broad categories, as follows:

Title of category	Description
In-principle views	Comments opposing or supporting the proposed increase in principle, or providing some additional context for these views
Alternative suggestions to increase compliance	Suggestions for alternative methods which respondents felt TfL should consider instead of increasing the cost of PCNs
Hardships caused by the proposals	Comments relating to the potential hardships that might be caused to road users should the cost of TfL PCNs be increased
General comments	A range of comments which did not relate specifically to the proposals, for example about the use made of the road network by various users, or about road infrastructure projects or policies

To further assist readers of this report, we have organised the issues raised by respondents thematically, and have broken down each of the categories above into these 'themes'. We have grouped our response to issues where relevant, to avoid unnecessary repetition.

If you have any questions about this or any other section of our Consultation Report, please contact us at consultations@tfl.gov.uk

In-principle views

Theme	Issue	TfL's response
Support increase in PCN	Yes, increase the PCN charge	Noted
	Would improve safety	Noted
	Support annual / periodic increases	<p>Consultation on the Mayors Transport Strategy ended on 2 October 2017. Proposal 18 states that "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". As such the Mayor, through TfL, will continue to ensure that the scheme is reviewed regularly to ensure that our penalty and enforcement strategy supports the objectives of the scheme.</p> <p>Should TfL determine that further changes are required to the scheme in order to reduce congestion then this will be discussed with the Mayor. There are currently no plans for an annual increase to the PCN value.</p>
	Would improve traffic flow	This benefit is noted within the consultation impact assessment section 2.2.

Theme	Issue	TfL's response
Support increased charges for certain reasons/vehicles only	Stopping in yellow box	<p>All contraventions on the Transport for London Road Network (TLRN) have a negative impact on traffic congestion and traffic flow. This is because vehicles parked on the TLRN, driving in bus lanes or entering yellow box junctions disrupt the flow of traffic, slow down other road users and lead to congested roads. It has been estimated that the cost of congestion on the TLRN alone is annually worth almost £2.2 billion⁷.</p> <p>By increasing the PCN value for all moving traffic contraventions TfL is taking action to address poor driving behaviour that directly leads to increased levels of traffic congestion and poor traffic flow. Implementing an increase to only one contravention would dilute the impact of the proposed change and would not have the desired effect as outlined in the consultation impact assessment.</p>
	Stopping in a red route	
	Commercial vehicles	<p>All contraventions on the TLRN have a negative impact on traffic congestion and traffic flow. This is because vehicles parked on the TLRN, driving in bus lanes or entering yellow box junctions disrupt the flow of traffic, slow down other road users and lead to congested roads.</p>
	Private hire cars	
	Taxis	
	Uber	<p>TfL's priority in managing the TLRN is to keep traffic moving. The legislation used to enforce traffic contraventions on the TLRN does not distinguish between vehicle types or driver groups and as such TfL can not selectively enforce against a particular group of road users.</p>
	Overseas drivers / visitors (including within UK)	
	Diplomatic cars	<p>The Congestion Charge scheme order allows for exemptions and discounts to be applied to some road users. Taxis and PHV's (of which Uber is a PHV operator) are exempt from paying the charge. A full list of vehicles that qualify for a discount or exemption can be found at https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions</p>
	Private cars (not hired)	

⁷ Total vehicle delay for London 2014-15 <http://content.tfl.gov.uk/total-vehicle-delay-for-london-2014-15.pdf>

Theme	Issue	TfL's response
		<p>Consultation on the Mayors Transport Strategy ended on 2 October 2017. Proposal 18 states that "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". As such the Mayor, through TfL, will continue to ensure that the scheme is reviewed regularly to ensure that our penalty and enforcement strategy meets the objectives of the scheme.</p> <p>Should TfL determine that further changes are required to the scheme in order to reduce congestion then this will be discussed with the Mayor.</p>
	Those that abuse blue badges	TfL does not have the power to prosecute for fraudulent use of a blue badge; however we will remove any Congestion Charging discounts where we have evidence showing non-compliance with the terms of the discount.
Uncertain about PCN increase	Need more evidence of the impact of a PCN increase	As per the consultation impact assessment section 4 (Monitoring) TfL will continue to review the effectiveness of enforcement on the TLRN and within the Congestion Charging Zone (CCZ).
	Need to see how monies collected would be spent	<p>By law, net revenues from the Congestion Charging scheme and from TLRN contraventions must be used for relevant transport purposes in London.</p> <p>The £1.9bn net revenue generated by the Congestion Charge over the last fourteen years was fed into ongoing investment in the Capital's transport infrastructure. Some £1.5bn has been spent on improvements to the bus network, £163m on roads and bridges, £79m on road safety, £98m on local transport/borough plans and £53m on sustainable transport and the environment.</p> <p>Application of parking revenue is published annually http://content.tfl.gov.uk/red-route-parking-spaces-and-revenue-16-17.pdf. Although not published, other red route revenue is allocated in the same way.</p>

Theme	Issue	TfL's response
Not affected by PCN	Need to look at similar systems elsewhere and their impacts	Noted.
	Never received a PCN charge before	Noted
	Do not drive in this area	Noted
	No personal effect	Noted
Oppose increase in PCN	No, with no additional context (nothing else said)	The proposed changes would deter road users from committing traffic contraventions on the TLRN and encourage those entering the Congestion Charge zone to pay the charge. As such this is anticipated to have a positive impact on some of the causes of congestion and will be a factor in TfL's overall strategy to reduce congestion on London's roads.
	No, but increase charge for certain users	<p>The legislation used to enforce traffic contraventions on the TLRN does not distinguish between vehicle types or driver groups and as such TfL can not selectively enforce against a particular group of road users.</p> <p>As per the consultation documents, PCN values on the TLRN are set by the Mayor with the approval of the Secretary of State. There are no plans to introduce variable charges depending on income or number of offences.</p> <p>TfL maintains that all road users, irrespective of age, income, vehicle use or mobility requirement, should obey the relevant traffic regulations when driving through the CCZ or using the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN.</p>
	No, improve road	The draft Mayors Transport Strategy outlines the steps that the Mayor, through TfL,

Theme	Issue	TfL's response
	infrastructure instead	will take to invest in and Improve London's transport infrastructure during this Mayoral term.
	No, improve public transport instead	
	No, existing charge is adequate / no need to change	<p>The issuing of PCNs is a key tool utilized by TfL to help manage driver behaviour on London's roads. A PCN is an active deterrent that can help influence whether or not contraventions are committed by drivers. As repeat offending on the TLRN has been increasing since 2011, along with overall PCN volumes, TfL has concluded that the deterrent effect of a PCN needs to be reinforced in order help tackle congestion and traffic flow.</p> <p>The proposed changes aims to deter road users from committing traffic contraventions on the TLRN and encourage those entering the Congestion Charge zone to pay the charge. This is anticipated to have a positive impact on some of the causes of congestion and will be a factor in TfL's overall strategy to reduce congestion on London's roads.</p> <p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take an intelligence-led approach to road enforcement across the road network. TfL's roads carry over a third of all London's traffic and we enforce traffic regulations to keep traffic moving safely and efficiently for the benefit of all road users, and supporting the economic life of the city. We continually review the locations where PCNs are issued and we are always looking to improve the information provided to our customers at these locations.</p> <p>Actions such as drink driving, speeding or using a mobile telephone while driving are classed as criminal offences enforced by the Metropolitan Police Service. TfL's enforcement is a civil process. We do not have the power to set the fines for criminal offences.</p> <p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the road network. TfL's roads carry over a third of all London's traffic and we enforce traffic regulations to keep traffic moving safely and efficiently for the benefit of all road</p>
	No, will not increase compliance or change behaviour	
	No, PCN Charge should be reduced / already high	
	No, abolish the PCN charge	
	Fines are already higher for parking offences than other motoring fines	
	Limit high fines to other driving offences (drink driving / speeding / using mobile etc.)	

Theme	Issue	TfL's response
		users. As such we will continue to review our enforcement approach to ensure it is an ongoing deterrent to drivers committing contraventions on London's roads.
	Criticism of TfL motivations for increasing charge (greed etc.)	<p>By law, net revenues from the Congestion Charging scheme and from TLRN contraventions must be used for relevant transport purposes in London.</p> <p>The £1.9bn net revenue generated by the Congestion Charge over the last fourteen years was fed straight into ongoing investment in the Capital's transport infrastructure. Some £1.5bn of which has been spent on improvements to the bus network, £163m on roads and bridges, £79m on road safety, £98m on local transport/borough plans and £53m on sustainable transport and the environment.</p> <p>Application of parking revenue is published annually http://content.tfl.gov.uk/red-route-parking-spaces-and-revenue-16-17.pdf. Although not published, other red route revenue is allocated in the same way.</p> <p>TfL will continue to reinvest this money for the betterment of everyone that works, lives or visits London in line with the Mayors Transport Strategy.</p>
Oppose increased penalties for certain user types/ reasons	Disabled drivers	The legislation used to enforce traffic contraventions on the TLRN does not distinguish between vehicle types or driver groups and as such TfL can not selectively enforce against a particular group of road users.
	Elderly drivers	
	Those caring for vulnerable people (e.g. carers, nurses etc.)	<p>On the TLRN (Red Route) customers with a Blue Badge can generally park for up to three hours in loading bays, and can generally park for as long as required in designated parking bays. Where Blue Badge parking is permitted, customers should clearly display their blue badge and check signage by the bay in order to understand how long they are able to park for. Signage at loading or parking bays will confirm if any restrictions apply. Blue Badge holders can also pick up and drop off on the TLRN roads marked with red lines if this is quick.</p> <p>A guide for Blue Badge holders and their use of the red route can be found on the TfL website (http://content.tfl.gov.uk/blue-badge-holders-guide.pdf)</p>

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		<p>As per the consultation impact assessment, an equalities impact assessment was undertaken and found that there is no evidence that an increase in the PCN value for the Congestion Charge or TLRN contraventions would disproportionately affect any of the equality target groups. This includes, elderly or disabled drivers.</p> <p>All road users, irrespective of age, income or mobility requirement, should obey the relevant traffic regulations when driving in the CCZ or on the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN.</p> <p>Customers wishing to drive into or through the CCZ have to pay a daily charge of £11.50 per day. To avoid contravening the Congestion Charge (CC) scheme, TfL offers customers a number of options to pay for the charge. Customers can pay in advance, on the day or by midnight the day after travelling into the CCZ.</p> <p>Congestion Charge customers can also ensure they are never issued with a PCN by signing up for an AutoPay account. With AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month.</p> <p>The Congestion Charge scheme order also allows for exemptions and discounts to be applied to some road users. Taxis and PHV's are exempt from paying the charge. Residents within the CCZ can apply for a 90% daily discount, and road users with a blue badge can register for a 100% discount. A full list of road users or vehicles that qualify for a discount or exemption can https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions</p> <p>Through the NHS reimbursement, patients and a number of medical professionals be found at can claim back the cost of their Congestion Charge. On the red route, TfL also provides a number of dedicated loading</p>

Theme	Issue	TfL's response
		and disabled bays.
	Couriers	<p>The legislation used to enforce traffic contraventions on the TLRN does not distinguish between vehicle types or driver groups and as such TfL can not selectively enforce against a particular group of road users.</p> <p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the TLRN and apply this fairly to all road users. TfL's roads carry over a third of all London's traffic and we enforce traffic regulations to keep traffic moving safely and efficiently for the benefit of all road users.</p> <p>Customers wishing to drive into or through the CCZ have to pay a daily charge of £11.50 per day. To avoid contravening the Congestion Charge (CC) scheme, TfL offers customers a number of options to pay for the charge. Customers can pay in advance, on the day or by midnight the day after travelling into the CCZ.</p> <p>Congestion Charge customers can also ensure they are never issued with a PCN by signing up for an AutoPay account. With CC AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month.</p> <p>Residents that drive in the CCZ are able to apply for a 90% discount for the Congestion Charge, also payable through an AutoPay account. PHVs are exempt from paying the Congestion Charge but are required to meet all relevant traffic regulations when driving on the TLRN.</p>
	Commercial vehicles / tradespeople	
	Diesel vehicles	
	Private hire vehicles	
	Residents / those living locally	
Infrastructure issues contribute to offences / contraventions	Poor road layout causes offences	<p>At present c.97% of road users comply with TLRN and Congestion Charging regulations and so avoid being issued with a PCN. This high compliance rate is achieved through TfL's actions to promote the rules of the TLRN and Congestion Charge Scheme, as well as ensuring that all on-street infrastructure required to enforce the schemes are fit for purpose.</p>
	Poor road signage	

Theme	Issue	TfL's response
	causes offences	Signs and road markings along the TLRN are there to inform customers what they can and can't do. To avoid being issued with a PCN road users should ensure that they follow these signs and road markings.
	Traffic signalling causes offences	
	Concentrate on traffic flow / better traffic management	The rules for Red Routes are clearly explained in the latest edition of the Highway Code and are also explained on the TfL website (https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes).
	Traffic calming causes drivers to offend	The Congestion Charge scheme has been in operation since 2003, is signed across all entry points to the CCZ and continues to be widely publicised by TfL to ensure public and businesses are aware of the need to pay the daily charge to drive in the zone.
	Offences caused by other vehicle movements (including emergency vehicles)	<p>In addition to this TfL offers customers a number of options to pay for the charge. Customers can pay in advance, on the day or by midnight the day after travelling into the CCZ.</p> <p>Congestion Charge customers can also ensure they are never issued with a PCN by signing up for an AutoPay or Fleet AutoPay account. With AutoPay, customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month.</p> <p>Customers, who believe that they should not have received a PCN for a contravention on the TLRN or for non payment of the Congestion Charge, or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case. More information on representations and appeals can be found at https://tfl.gov.uk/modes/driving/congestion-charge/penalties-and-enforcement/challenge-a-penalty-charge/make-a-representation and https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>

Theme	Issue	TfL's response
	Sat Nav routes cause drivers to offend	It is the responsibility of the individual road user to drive in a responsible and safe manner, abiding by all relevant rules and regulations at all times. Signs and road markings are provided along the CCZ boundary and along the TLRN. They are there to inform customers what they can and can't do. To avoid being issued with a PCN road users should ensure that they follow these signs and road markings.
Parking and Loading issues contribute to offences / contraventions	Provide more parking and loading spaces (including outside zone)	TfL regularly engages with the freight industry and our customers to understand any issues they may have when using London's roads. In 2013 TfL took action to address business and customer concerns by adding almost 600 stop and shop bays to the TLRN, an increase of nearly a third.
	Removing parking spaces causes offences	TfL has a duty to balance the conflicting needs of all road users against our Network Management Duty, which is to keep traffic moving on our roads.
	Difficulties for taxi drivers in picking up / dropping off passengers	<p>All red route traffic orders include an exemption allowing taxi and private hire drivers to pick up/set down passengers: https://tfl.gov.uk/modes/driving/red-routes/exemptions</p> <p>TfL also allows taxis to stop for up to 5 minutes between 10pm – 6am to allow passengers to use an ATM</p>
	Difficulties for drivers picking up / dropping off	<p>TfL's road network is designated as red route in light of its strategic importance in keeping traffic in London moving. As a general rule, stopping is only allowed at specific locations, at specific times, and for specific reasons.</p> <p>All red route traffic orders include an exemption allowing taxi and private hire drivers to pick up/set down passengers: https://tfl.gov.uk/modes/driving/red-routes/exemptions</p> <p>Blue Badge holders can also pick up and drop off on the TLRN roads marked with red lines if this is quick.</p>

Theme	Issue	TfL's response
	Introduce registration to book delivery bays	TfL has no plans at present to introduce a system to allow for bookable delivery bays.

Alternative suggestions to increase compliance

Theme	Issue	TfL's response
Improved PCN system	Would like to see a better discount for early/prompt payments	<p>The discounts for TLRN PCNs are set out within the relevant legislation; TfL does not have the power to change this.</p> <p>The 50% discount for prompt payment of a Congestion Charge (CC) PCN is consistent with other enforcement legislation. TfL maintains that the 50% discount offered for payment of a CC PCN within 14 days is a considerable incentive for drivers to make a prompt payment. An increased discount for prompt payment is not under consideration.</p>
	More time given to pay charge	<p>Payment times for TLRN PCNs are set out within the relevant legislation; TfL does not have the power to change this.</p> <p>The payment times for prompt payment of a CC PCN are consistent with other enforcement legislation. TfL maintains that the time available to make payment at either the 50% discounted value (14 days) or full PCN value (28 days) is a fair and proportionate period to ensure a PCN is paid. Changes to payment timescales are not under consideration.</p>
	Easier payment system needed	<p>PCN payments can be made online, on the phone or by post (cheque). Details of how payment can be made are clearly outlined on the PCN. TfL maintains that the options to pay a PCN are easily accessible to our customers and do not unfairly disadvantage any groups from making payments in a timely manner.</p> <p>Customers, who believe that they should not have received a PCN for a contravention on the TLRN or for non payment of the Congestion Charge, or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case. More information on representations and appeals can be found at https://tfl.gov.uk/modes/driving/congestion-charge/penalties-and-enforcement/challenge-a-penalty-charge/make-a-representation and https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-representation</p>

Theme	Issue	TfL's response
		notices/make-a-representation
	Promotion of automatic payment system	<p>TfL does not offer an automatic payment system for TLRN contraventions. However payments can be made online, by phone or by post.</p> <p>The Congestion Charge AutoPay and Fleet AutoPay systems were implemented in 2011. Both ensure that customers are never issued with a PCN by signing up for an AutoPay account. With CC or Fleet AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month.</p> <p>TfL includes information about Auto Pay on our correspondence. Auto Pay is also prominently displayed on our website and we have run a number of public information campaigns to promote the service.</p>
	Better customer service	<p>Customers who believe that they should not have received a PCN for a contravention on the TLRN or for non payment of the Congestion Charge, or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case. More information on representations and appeals can be found at https://tfl.gov.uk/modes/driving/congestion-charge/penalties-and-enforcement/challenge-a-penalty-charge/make-a-representation and https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notices/make-a-representation</p> <p>For any issues with the service provided by TfL there is a 3 stage complaints procedure offered by TfL. If customers are still not satisfied that their complaint has been sufficiently addressed then this can be escalated to the Local Government Ombudsman.</p>
	Text alerts when entering PCN zone	<p>TfL does not offer a text alert service for either the TLRN or the Congestion Charge Zone.</p> <p>Signs and road markings along TLRN are there to inform customers what they can</p>

Theme	Issue	TfL's response
		<p>and can't do. To avoid being issued with a PCN road users should ensure that they follow these signs and road markings.</p> <p>The rules for Red Routes are clearly explained in the latest edition of the Highway Code and are also explained on the TfL website (https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes).</p> <p>The Congestion Charge scheme has been in operation since 2003, is signed across all entry points to the CCZ and continues to be widely publicised by TfL to ensure public and businesses are aware of the need to pay the daily charge to drive in the zone.</p> <p>An interactive map of the CCZ can be found at https://tfl.gov.uk/modes/driving/congestion-charge/congestion-charge-zone</p> <p>TfL maintains that the signage for the TLRN and CCZ is a fair and proportionate means to inform customers of the applicable rules and regulations while driving on London's roads. We have no plans to introduce a text alert service for customers.</p>
	Extend the PCN zone	PCNs are issued for all contraventions committed on the TLRN and within the CCZ. TfL can not extend its powers to issue PCNs to roads or schemes that it does not have authority over.
	New system is needed	Consultation on the Mayors Transport Strategy ended on 2 October 2017. Proposal 18 of the strategy states that "The Mayor will give consideration to the development of the next generation of road user charging systems. These could replace schemes such as the Congestion Charge, Low Emission Zone and Ultra Low Emission Zone. More sophisticated road user charging and/or workplace parking levy schemes could be used to contribute to the achievement of the policies and proposals in this strategy, including mode share, road danger reduction and environmental objectives, and to help reduce congestion on the road network and support efficient traffic movement. In doing so, the Mayor will consider the appropriate technology for any future schemes, and the potential for a future scheme that reflects distance,

Theme	Issue	TfL's response
		time, emissions, road danger and other factors".
	Introduce payment app / online service	PCN payments can already be made online at https://tfl.gov.uk/modes/driving/pay-a-pcn . An app to pay a for either Congestion Charge or TLRN PCNs is currently under development. A launch date for the app is still to be determined.
	Introduce improved appeals system / no charges for failed appeals	The statutory representations and appeals procedure is defined by legislation. TfL does not have the power to change this; however there is no charge for challenging a PCN.
	Improved payment reminder system (e.g. texts / emails)	TfL has no plans to introduce a payment reminder service.
	Offer incentives for complying with congestion charge and red routes	The Congestion Charge AutoPay and Fleet AutoPay systems offer incentives to customer that register for these services. With CC or Fleet AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month. TfL does not offer incentives for complying with TLRN regulations.
	Oppose charge to set up automated payments / should be free to set up	The annual registration and renewal fee reflects the cost to TfL of setting up and maintaining this service. Customers who register for the Auto Pay service pay a reduced daily charge, currently £10.50 instead of £11.50. Drivers will recoup the cost of their registration or renewal if they use the zone for at least 10 days during their registration year
	Reduce the PCN zone	PCNs are issued for all contraventions committed on the TLRN in line with legislation. There are no plans to reduce the CCZ and TfL will continue to issue

Theme	Issue	TfL's response
		PCNs to drivers that enter the zone without paying.
	Fine those that park on double yellow lines	There are no double yellow lines on TfL's road network, which is designated as red route in light of its strategic importance in keeping traffic in London moving. TfL may issue PCNs to any driver contravening the red route restrictions. Stopping is not allowed at any time on double red lines and is only allowed at restricted times on single red lines and in most bays.
	Charge should be consistent across all vehicles / users	PCN charges are consistent for all vehicles and users that commit a contravention on the TLRN. For the Congestion Charge Scheme there are a number of vehicles and users that are either exempt or receive a discount for driving in the zone. These discounts and exemptions were consulted on before being implemented. A full list of road users or vehicles that qualify for a discount or exemption can be found at https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions
More severe punishment for offences	No discount for repeat offences	Discounts for TLRN PCNs are set out within the relevant legislation. TfL does not have the power to change this. The 50% discount for prompt payment of a CC PCN is consistent with other enforcement legislation.
	Driving license points should be issued for offences	TfL's enforcement is a civil process. We do not have the power to endorse licences.
	Clamp or tow offending vehicles	We have no plans to introduce clamping and removal on TfL's roads, however we can ask the Metropolitan Police Service to remove vehicles that are causing an obstruction.
Operate a scaled	Income (higher charges	Every civil parking and traffic contravention has a code and description, see

Theme	Issue	TfL's response
system of penalty charges based on various criteria	for higher earners)	http://www.londoncouncils.gov.uk/download/file/fid/20848 .
	Number of offences (higher charges for repeat offenders)	<p>This document identifies the contraventions that are classified as higher and lower level parking and moving traffic contraventions. TfL has consulted on TLRN parking and moving traffic contraventions that are issued at the higher Band A rate (currently £130) as these are considered as more serious contraventions than the lower Band B rate (currently £110).</p> <p>These bandings for TLRN contraventions are set by the Mayor with the approval of the Secretary of State. There are no plans to introduce variable charges depending on income or number of offences etc.</p> <p>The CC PCN level is consistent with other enforcement legislation. There are no plans to introduce variable charges depending on income or number of offences etc.</p>
	Severity of offence (lower charges for mistakes)	
	Value of car (higher charges for more expensive cars)	
	Engine size (higher charges for larger engines)	
	Age of vehicle	
	Proximity to central London (Higher in Zone 1)	
	Based on inflation / cost of living	
	Different penalties applied to Red Routes and the Congestion Charge	
	Emissions (smaller penalties for hybrid /	The legislation used to enforce traffic contraventions on the TLRN does not distinguish between vehicle types and as such TfL can not apply a different PCN

Theme	Issue	TfL's response
	electric vehicles)	<p>value to a specific type of vehicle. To address this would require action from the Secretary of State for Transport.</p> <p>Cars or vans (not exceeding 3.5 tonnes gross vehicle weight) which emit 75g/km or less of CO2 and that meet the Euro 5 standard for air quality qualify for a 100% discount on the Congestion Charge.</p> <p>We have recently implemented a CC emissions surcharge for older, more polluting vehicles.</p>
Greater enforcement of existing system	Increase use of CCTV	TfL has a duty to balance the cost of enforcement against our Network Management Duty, which is to keep traffic moving on our roads.
	More traffic warden patrols	<p>The deterrent effect and subsequent benefits of camera enforcement is well known and understood in London and plays a crucial role in reducing the number of contraventions.</p> <p>TfL intends to maintain its current CCTV and warden patrol strategy. We will keep it under review in order to ensure our duties are met and enforcement remains value for money.</p>
	Ensure fines are enforced and collected	Unpaid PCNs are actively pursued by TfL through the use of enforcement agents (bailiffs). This follows the statutory enforcement process in place to recover money due from unpaid PCNs.
	Ensure fines are enforced on the driver rather than their company / employer	Red route legislation, covering the TLRN, sets out that it is the owner of a vehicle, not the driver, who is liable for payment of a PCN; TfL does not have the power to change this. As such when a contravention is committed TfL request keeper details from the DVLA and this is used to issue the PCN.
	Ensure fines are enforced on the driver rather than the vehicle	<p>If the registered keeper wishes to make a representation against a PCN then more information on this process can be found at https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p> <p>The CC Scheme Order is consistent with red route legislation on this point.</p>

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		<p>Congestion Charge PCN representations can be made on the grounds that:</p> <ul style="list-style-type: none"> • You were not the keeper at the time of the contravention • You had paid the charge • Your vehicle was exempt • The vehicle was used or taken without your consent • You had registered for a 100% discount • The vehicle was on hire to someone else <p>More information on CC representations can be found at https://tfl.gov.uk/modes/driving/congestion-charge/penalties-and-enforcement</p>
	Introduce toll gates	TfL has no plans to introduce toll gates
	Fines for unattended vehicles	TfL will enforce and issue PCNs to any vehicle found to be committing a parking or moving traffic contravention on the roads it is responsible for. If a vehicle is parked on the TLRN where parking is prohibited or it has overstayed the time allowed for parking, then a PCN would be issued.
Other possible measures to encourage compliance	More time restrictions for commercial vehicles	TfL has a duty to balance the conflicting needs of all road users against our Network Management Duty, which is to keep traffic moving on our roads. Stopping on the red route is only allowed at specific locations, at specific times, and for specific reasons. As a general rule, stopping is not allowed where it would impede traffic flow, particularly at peak hours.
	Alternate day travel scheme (access alternates based on number plate - e.g. odd / even numbers)	TfL does not have any plans to implement an alternative day travel scheme.
	Driver education /	TfL aims to educate customers that receive a PCN by providing them with guidance on how to avoid reoffending. This guidance is issued with the PCN and further

Theme	Issue	TfL's response
	awareness programmes	<p>information regarding red route offences can also be found on the TfL website.</p> <p>https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes/red-lines-and-no-stopping</p>
	Stop road schemes - loss of road space / construction related closures	<p>Following the establishment of the Mayors Roads Task Force (RTF) in 2013, London has seen a significant number of changes in road layout and design across the TLRN. In 2014 TfL responded to the vision set out by the RTF through its £4b Roads Modernisation Plan. This has resulted in an unprecedented programme of planned road improvements and transformations across both the TLRN and Greater London.</p> <p>Further enhancements and improvements to London's transport network are outlined in the draft Mayors Transport Strategy. The document sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years.</p> <p>https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Inform DVLA of repeat offender vehicles	DVLA is not responsible for enforcing against drivers that commit contraventions on the TLRN or for not paing the Congestion Charge.
	Ban vehicles from particular areas	TfL has no plans to ban offending vehicles from entering the CCZ or driving on the TLRN.
	Provide alternative routes to avoid the congestion charge	<p>The Congestion Charge scheme has been in operation since 2003, is signed across all entry points to the CCZ and continues to be widely publicised by TfL to ensure public and businesses are aware of the need to pay the daily charge to drive in the zone.</p> <p>An interactive map of the CCZ can be found at https://tfl.gov.uk/modes/driving/congestion-charge/congestion-charge-zone</p>

Theme	Issue	TfL's response
		Alternative routes are available for vehicles to drive around rather than through the CCZ.
	Introduce Park and Ride scheme	TfL has no plans to introduce park and ride schemes.
	Inform insurance companies of repeat offenders	Failure to pay a PCN is a civil rather than criminal offence and currently has no bearing on someones insurance premium.
	Name and shame offenders	Data protection legislation would prevent TfL from naming and shaming offenders. TfL has no plans to do this.
Less enforcement of existing PCN system is needed	Less use of CCTV	<p>TfL has a duty to balance the cost of enforcement against our Network Management Duty, which is to keep traffic moving on our roads.</p> <p>The deterrent effect and subsequent benefits of camera enforcement is well known and understood in London and plays a crucial role in reducing the number of contraventions.</p> <p>TfL intends to maintain its current CCTV strategy, but will keep it under review in order to ensure its duties are met and remain value for money.</p>
	Abolish red routes / congestion charge zone	<p>TfL's road network is designated as red route in light of its strategic importance in keeping traffic in London moving.</p> <p>The Congestion Charge Scheme was implemented to help address congestion on London's roads. TfL has no plans to abolish either.</p>
	Allow more time in yellow boxes	The purpose of a yellow box is to keep the area clear of stationary traffic to facilitate the movement of traffic through the junction. Any vehicle stopping in a yellow box

Theme	Issue	TfL's response
		<p>risks causing an obstruction and impeding traffic flow.</p> <p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the road network. TfL's roads carry over a third of all London's traffic and we enforce traffic regulations to keep traffic moving safely and efficiently for the benefit of all road users, and support the economic life of the city.</p>
	Less over-zealous traffic wardens	<p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the road network. TfL's roads carry over a third of all London's traffic and we enforce traffic regulations to keep traffic moving safely and efficiently for the benefit of all road users, and supporting the economic life of the city. As such we will continue to review our enforcement approach to ensure it is an ongoing deterrent to drivers committing contraventions on London's roads.</p>
	More flexible red route / congestion charging zone times	
	No fine for first time offenders	<p>All road users should obey the relevant traffic regulations when driving through the CCZ) or using the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN.</p> <p>First time offenders, who believe that they should not have received a PCN for a contravention on the TLRN or for non payment of the Congestion Charge, or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case. More information on representations and appeals can be found at https://tfl.gov.uk/modes/driving/congestion-charge/penalties-and-enforcement/challenge-a-penalty-charge/make-a-representation and https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notices/make-a-representation</p>
	Allow other vehicles to enter bus lanes or remove bus only lanes	<p>Part of TfL's Network Management Duty is to ensure the expeditious movement of traffic, which includes the movement of passenger transport services.</p> <p>TfL is responsible for the reliable operation of bus services in London, which rely on the use of bus lanes. As such there are no plans to allow additional vehicles, apart</p>

Theme	Issue	TfL's response
		from those already permitted, to travel in bus lanes.
	Relax rules during events	TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the road network. This is equally applicable during major events that may impact the road network and the flow of traffic.

Hardships caused by the proposals

Theme	Issue	TfL response
Effects on wider economy / society	Will affect economy / detrimental effect on businesses	<p>Contraventions on the TLRN have a negative impact on traffic congestion and traffic flow. This is because vehicles parked on the TLRN, driving in bus lanes or entering yellow box junctions disrupt the flow of traffic, slow down other road users and lead to congested roads. It has been estimated that the cost of congestion on the TLRN alone is annually worth almost £2.2 billion.</p> <p>If action is not taken to address the increasing number of CCZ and TLRN contraventions, then the impact on London's economy will continue to grow. TfL has proposed the increase in the CC and TLRN PCN value to actively deter drivers from committing contraventions. It is anticipated that this deterrent effect will reduce the number of contraventions and have a positive impact on congestion and traffic flow. As such this should have a flow on positive impact for businesses.</p> <p>All businesses that have vehicles that drive in the CCZ can sign up for an AutoPay or Fleet AutoPay account. With AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month. As such any increase in the CC PCN value would not have any impact on a business that pays for their daily charge in this way.</p>
	Increase should be in line with cost of living - London is already expensive	<p>The TLRN PCN value has not been increased since 2011 and the CC PCN value has not been increased since 2013. In increasing the value TfL intends to (i) reflect the fact that the PCN value has not kept in step with inflation, and (ii) ensure that the value is a proportionate deterrence that will actively dissuade drivers from committing contraventions on London's roads.</p> <p>Previous PCN increases have been proportionally greater than the one proposed in this consultation. In 2004 the PCN value increased from £80 to £100, a 25%</p>

Theme	Issue	TfL response
		increase overall.
	Charges would impact everyone/everyone would be penalised/affected	All road users, irrespective of age, income or mobility requirement, should obey the relevant traffic regulations when driving through the CCZ) or using the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN.
	May deter business / tourists	The rules for Red Routes are clearly explained in the latest edition of the Highway Code and are also explained on the TfL website (https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes)
	Will cause further hardship (non-specific)	<p>Signs and road markings along Red Routes are there to inform customers what they can and can't do. To avoid being issued with a PCN road users should ensure that they follow these signs and road markings.</p> <p>Customers wishing to drive into or through the CCZ have to pay a daily charge of £11.50 per day. To avoid contravening the Congestion Charge (CC) scheme, TfL offers customers a number of options to pay for the charge. Customers can pay in advance, on the day or by midnight the day after travelling into the CCZ.</p> <p>Congestion Charge customers can also ensure they are never issued with a PCN by signing up for an AutoPay account. With CC AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month.</p> <p>Customers, who believe that they should not have received a PCN or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case.</p>
	Will increase journey times	Contraventions on the TLRN have a negative impact on traffic congestion and traffic flow. This is because vehicles parked on the TLRN, driving in bus lanes or entering yellow box junctions disrupt the flow of traffic, slow down other road users and lead

Theme	Issue	TfL response
		<p>to congested roads.</p> <p>If action is not taken to address the increasing number of CCZ and TLRN contraventions, then the impact on congestion and traffic flow will continue to grow. TfL has proposed the increase in the CC and TLRN PCN value to actively deter drivers from committing contraventions. It is anticipated that this deterrent effect will reduce the number of contraventions and have a positive impact on congestion and traffic flow.</p>
Increased PCN would causes hardship to specific driver types	All drivers (increased stress)	All road users, irrespective of age, income or mobility requirement, should obey the relevant traffic regulations when driving through the CCZ or on the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN. All road users that abide by the rules of the TLRN and who pay the daily Congestion Charge will not be impacted by the proposal to increase the PCN value as they would not be issued with a PCN.
	Those making genuine mistakes or being forced into them	
	Those on lower incomes / poorer people	<p>The rules for Red Routes are clearly explained in the latest edition of the Highway Code and are also explained on the TfL website (https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes)</p> <p>Signs and road markings along Red Routes are there to inform customers what they can and can't do. To avoid being issued with a PCN road users should ensure that they follow these signs and road markings.</p>
	Commercial vehicle drivers	
	Commuters / frequent users	<p>Customers wishing to drive into or through the CCZ have to pay a daily charge of £11.50 per day. To avoid contravening the Congestion Charge (CC) scheme, TfL offers customers a number of options to pay for the charge. Customers can pay in advance, on the day or by midnight the day after travelling into the CCZ.</p> <p>Congestion Charge customers can also ensure they are never issued with a PCN by signing up for an AutoPay or Fleet AutoPay account. With AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone</p>
	Visitors and those unfamiliar with the road system	
	Public service users (carers, doctors etc.)	
	London residents	

Theme	Issue	TfL response
	New drivers / learners	<p>and will have their payment deducted automatically from their bank account or debit / credit card each month.</p> <p>Customers, who believe that they should not have received a PCN or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case.</p> <p>The following should also be noted for the Congestion Charge:</p> <ul style="list-style-type: none"> • Through the NHS reimbursement, patients and a number of medical professionals can claim back the cost of their Congestion Charge; and • Motorcycles are exempt from the Congestion Charge.
	Motorcycle users	
	Parents with children	
	All drivers (increased stress)	
	Those making genuine mistakes or being forced into them	

General comments

Theme	Issue	TfL response
Comments not directed at the consultation questions	Negative comments about buses (cause traffic congestion, number should be reduced)	<p>The Mayor has recently consulted on his draft transport strategy. This consultation ended on 2 October 2017. The themes of the strategy that are relevant to this issue are:</p> <ol style="list-style-type: none"> 1. Healthy Streets and healthy people <p>Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p> <ol style="list-style-type: none"> 2. A good public transport experience <p>Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <ol style="list-style-type: none"> 3. New homes and jobs <p>More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p> <p>For more information on how the Mayor plans to reduce congestion and maintain an effective public bus services across London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Negative comments about cyclists (break the law, under used cycle lanes; need to pay road	<p>For more information on how the Mayor plans for cycling in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>

Theme	Issue	TfL response
	tax etc.)	
	Negative comments about private hire vehicles (e.g. ban them)	<p>The Mayor has recently consulted on his draft transport strategy. This consultation ended on 2 October 2017. Proposal 73 in the draft MTS states that “The Mayor, through TfL, will seek powers to limit the overall number of private hire vehicles licensed for use in London so as to manage their contribution to overall congestion.</p> <p>For more information on how the Mayor plans to manage PHVs in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Negative comments about rickshaws (taking up space on road, do not pay tax etc.)	<p>Pedicabs, or cycle rickshaws, are not regulated by TfL and we recognise that they can cause disruption to other road users. Pedicabs may be a common sight in London's West End, but their riders do not need to be licensed, have insurance or be checked by the Criminal Records Bureau.</p> <p>TfL has previously called for a change to legislation that would allow us to ban dangerous pedicabs in London.</p>
	General negative comments about TfL not relating to PCN	Complaints or feedback concerning the services offered by TfL should be directed to the relevant business area through the following webpage https://tfl.gov.uk/help-and-contact/
	General negative comments about government	Issues with either local authorities, the GLA or central government should be addressed directly with the authority or department concerned.
	Remove traffic calming measures / street furniture	Following the establishment of the Mayors Roads Task Force (RTF) in 2013, London has seen a significant number of changes in road layout and design across the TLRN. In 2014 TfL responded to the vision set out by the RTF through its £4b Roads Modernisation Plan. This has resulted in an unprecedented programme of planned road improvements and transformations across both the TLRN and Greater

Theme	Issue	TfL response
		<p>London.</p> <p>Further enhancements and improvements to London's transport network are outlined in the draft Mayors Transport Strategy. The document sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years.</p> <p>https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	General concerns about pollution / air quality	<p>The Mayor recognises that air pollution has a detrimental impact on everyone who works, lives or visits London.</p> <p>In the draft Mayors Transport Strategy, Policy 5 states that The Mayor, through TfL and working with the boroughs, 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 will 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.</p> <p>For more information on how the Mayor plans to address the issues of pollution and air quality in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Improve cycle infrastructure	<p>For more information on how the Mayor plans for cycling in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Improve pedestrian infrastructure	<p>For more information on how the Mayor plans for healthy streets in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>

Theme	Issue	TfL response
	Congestion charge / PCN has no impact on congestion	TfL maintains that an effective enforcement regime on the TLRN and the introduction of the CCZ in 2003 has had a positive impact on congestion, particularly in central London. For more information on current traffic flows and level of congestion please go to http://content.tfl.gov.uk/travel-in-london-report-9.pdf
	Ban diesel and highly polluting vehicles	<p>The Mayor recognises that air pollution has a detrimental impact on everyone who works, lives or visits London. In the draft Mayors Transport Strategy, Policy 5 states that The Mayor, through TfL and working with the boroughs, 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 will 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.</p> <p>For more information on how the Mayor plans to address the issues of pollution and air quality in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Introduce lower speed limits to improve traffic flow	The draft Mayor’s Transport Strategy states that “A new ‘Liveable Neighbourhoods’ programme of local measures will also be essential to address pollution at borough level in local air quality hotspots and at sensitive locations such as schools. TfL and the boroughs will also be expected to take targeted action and fulfil their statutory duties, including using tools such as road charges, differential parking charges, street closures and vehicle restrictions, tackling engine idling, promoting efficient driving, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate)”.
	Negative comments about commercial vehicles	TfL regularly engages with the freight industry and our customers to understand any issues they may have when using London’s roads. In 2013 TfL took action to address business and customer concerns by adding almost 600 stop and shop bays to the TLRN, an increase of nearly a third.
	Differences in transport enforcement policies	Issues with enforcement in London boroughs should be directed to the relevant local authority.

Theme	Issue	TfL response
	across London Boroughs	
	Negative comments about motorcycles	For more information on how the Mayor plans for healthy streets in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017
	Negative comments about pedestrians	
	Encourage car sharing	
	General road safety concerns	
	Stop engine idling when in congestion or traffic jams	The draft MYS states that “A new ‘Liveable Neighbourhoods’ programme of local measures will also be essential to address pollution at borough level in local air quality hotspots and at sensitive locations such as schools. TfL and the boroughs will also be expected to take targeted action and fulfil their statutory duties, including using tools such as road charges, differential parking charges, street closures and vehicle restrictions, tackling engine idling, promoting efficient driving, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate)”.
	Increase other taxes to gain revenue (Council tax, car tax etc.)	TfL can not comment as it has no tax raising powers to take such steps.
	Public transport is a good alternative / adequate	Noted
	Use River Thames / canals for deliveries	In TfL’s River Action plan we state that “Freight transport on the Thames within London is expected to increase substantially over the next 10 years or so, primarily owing to a commitment by major infrastructure projects, including the Thames Tideway Tunnel and Northern line extension, to maximise use of the river, but also

Theme	Issue	TfL response
		through increasing modal shift. The Port of London Authority (PLA) is confident that the Thames can accommodate this predicted rise in freight movements, together with the proposed increase in passenger journeys. Where there are local issues, these will be managed by the PLA.”
	Once one borough increases charge, others will follow	TfL can not comment on what plans London Boroughs may or may not have to consult on PCN charges on borough roads.
	All cars should be manufactured as low emission / electric vehicles	<p>The Mayor recognises that air pollution has a detrimental impact on everyone who works, lives or visits London. In the draft Mayors Transport Strategy, Policy 5 states that The Mayor, through TfL and working with the boroughs, 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 will 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.</p> <p>The draft Mayor’s Transport Strategy also states that “A new ‘Liveable Neighbourhoods’ programme of local measures will also be essential to address pollution at borough level in local air quality hotspots and at sensitive locations such as schools. TfL and the boroughs will also be expected to take targeted action and fulfil their statutory duties, including using tools such as road charges, differential parking charges, street closures and vehicle restrictions, tackling engine idling, promoting efficient driving, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate)”.</p> <p>For more information on how the Mayor plans to address the issues of pollution and air quality in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Comments about the T-Charge	Older vehicles driving in central London now need to meet minimum Euro emission standards or pay an extra daily charge. This is in addition to the Congestion Charge. The T-Charge (officially known as the Emissions Surcharge) operates in

Theme	Issue	TfL response
		<p>the Congestion Charge zone and is part of our commitment to help clean up London's dangerously polluted air.</p> <p>For further information on the T-Charge please go to https://tfl.gov.uk/modes/driving/emissions-surcharge</p>
	Introduce road user charging / mileage based charges	<p>Consultation on the Mayors Transport Strategy ended on 2 October 2017. Proposal 18 of the strategy states that “The Mayor will give consideration to the development of the next generation of road user charging systems. These could replace schemes such as the Congestion Charge, Low Emission Zone and Ultra Low Emission Zone. More sophisticated road user charging and/or workplace parking levy schemes could be used to contribute to the achievement of the policies and proposals in this strategy, including mode share, road danger reduction and environmental objectives, and to help reduce congestion on the road network and support efficient traffic movement. In doing so, the Mayor will consider the appropriate technology for any future schemes, and the potential for a future scheme that reflects distance, time, emissions, road danger and other factors”.</p>
Comments on the consultation process itself	Criticism of consultation in general / won't be listened to	<p>We hope that this Consultation Report, which includes our response to every issue raised by respondents to our consultation, demonstrates our commitment to listening carefully.</p>
	Criticism of questionnaire	<p>We designed our consultation questionnaire to provide the greatest scope for respondents to comment about any issue of concern while providing us with meaningful and detailed feedback that would be of use in the Mayor's decision making.</p>

