

Changes to the Congestion Charge

Report to the Mayor on the consultation

December 2021

Contents

Contents	2
1. Introduction	4
1.1. Purpose of report	4
1.2. Structure of this report.....	5
1.3. Congestion in London	5
1.4. Changing the Congestion Charge rules	7
2. Proposed changes consulted on	9
2.1. Introduction	9
2.2. History of the Congestion Charge	9
2.3. Summary of the consultation proposals	10
2.4. Integrated Impact Assessment.....	17
2.5. Protected characteristics and equalities	23
3. Consultation process	28
3.1. Introduction	28
3.2. Publicising the consultation	28
3.3. Consultation materials and channels for responding.....	30
3.4. Analysing the outcomes	31
4. Consultation responses	32
4.1. Introduction	32
4.2. About the respondents	32
4.3. Petitions and campaigns	37
4.4. Importance of reducing traffic and congestion in central London	38
4.5. Importance of increasing the number of people walking, cycling and using public transport in central London.....	40
4.6. Effectiveness of setting the level of the Congestion Charge at £15	42
4.7. Effectiveness of operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday).....	44
4.8. Effectiveness of operating the Congestion Charge on Saturday and Sunday and bank holidays between 12:00 and 18:00	46
4.9. Effect of re-opening applications for the residents' discount of 90 per cent of the Congestion Charge.....	48
4.10. Effectiveness of increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days	50
4.11. Effectiveness of no discount for payments made by Auto Pay or Fleet Auto Pay 52	
4.12. Importance of reimbursement arrangements	54

4.13.	Quality of the consultation	56
5.	Responses to issues raised	57
5.1.	Introduction	57
5.2.	General comments	59
5.3.	Comments on specific impacts.....	69
5.4.	Comments on specific proposals	98
5.5.	Comments on alternatives and mitigations.....	128
5.6.	Other comments relating to the Congestion Charge	136
5.7.	Consultation process.....	152
5.8.	Issues which were not related directly or indirectly to the proposals	157
6.	Conclusions and recommendations.....	158
6.1.	Conclusion	158
6.2.	Recommendations	161

Appendices

A – Supplementary Information

B – Marketing materials and questionnaire

C – Integrated Impact Assessment (IIA)

D – Code frames used by AECOM in analysing the responses

E – Consultation analysis report (by AECOM)

F – List of Stakeholders contacted

G – Summaries of stakeholder responses

H – Stakeholder responses to closed questions

1. Introduction

1.1. Purpose of report

1.1.1. Transport for London (TfL) has developed proposals to change the Congestion Charging scheme (CC scheme) to ensure that it remains effective in tackling congestion in central London and delivering the policies and proposals of the Mayor's Transport Strategy (MTS). The proposals are:

- a daily charge of £15
- a charge period of 07:00 to 18:00, Monday to Friday; and 12:00 to 18:00 on Saturdays, Sundays and bank holidays
- no charge between Christmas Day and New Year's Day bank holidays (inclusive)
- 90 per cent residents' discount, opened to all eligible applicants
- £17.50 charge level to pay after the day of travel, with the deadline for payment extended to three days after travel
- no discount for payments made by Auto Pay or Fleet Auto Pay
- updating of reimbursement arrangements for NHS patients who are vulnerable to risk of infection; care home workers working at care homes in the Congestion Charging zone (CCZ); and local authority/charity workers and volunteers providing certain services in relation to the COVID-19 pandemic, so that these arrangements apply during epidemics or pandemics prevalent in Greater London (which includes the current COVID-19 pandemic) – the expanded NHS staff reimbursement would also continue
- no online or app payments by residents for consecutive charging days.

1.1.2. The public and stakeholders were invited to give their views on the proposals in a consultation which was held over a ten-week period between 28 July 2021 and 6 October 2021.

1.1.3. This report describes how the consultation was carried out, summarises and provides analysis of the consultation responses and makes recommendations to the Mayor in response to the issues raised by the public and stakeholders. It should be read in conjunction with the consultation materials¹ (described in Chapter 3), which contain more details of the proposals, as well as information about their likely impacts and other relevant matters. Particular attention should be given to the Supplementary Information in Appendix A that was published as part of the consultation materials. The Mayor will be asked to take this report into account together with all the other information before him when deciding whether to confirm the proposals, with or without modification.

¹ <https://haveyoursay.tfl.gov.uk/congestion-charge-changes>

1.2. Structure of this report

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

Chapter 1: Introduction – The remainder of this chapter provides the background to the consultation, including the legislative framework which applies when proposals are made to modify a road user charging scheme.

Chapter 2: Proposed changes consulted on – A summary of the proposals and their impact on traffic in the zone.

Chapter 3: Consultation process – A summary of the consultation process.

Chapter 4: Consultation responses – The outcomes of the consultation, including the number of responses received and who they were from.

Chapter 5: Responses to issues raised – Our responses to the key issues raised in relation to the proposals by theme.

Chapter 6: Conclusions and recommendations – Our overall conclusions and recommendations to the Mayor.

- 1.2.2. This report also has appendices pertaining to the marketing of the consultation, online access to it through the consultation website, and the consultation questionnaire (Appendix B).
- 1.2.3. The individual consultation responses have been made available to the Mayor for his consideration.²
- 1.2.4. Should the Mayor decide to proceed with the changes, a phased London-wide customer information campaign would be launched. The first phase would follow the Mayor's decision in December, while the second phase would precede those changes that would be implemented on 21 February 2022 (brought forward from 28 February 2022 following discussions with TfL 's external suppliers as to when signage works could be completed).

1.3. Congestion in London

- 1.3.1. London's streets are some of the most congested in the country, delaying bus services and other essential traffic such as freight, making walking and cycling unpleasant and unattractive, worsening air quality and carbon emissions, and leading to increased road danger.

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

- 1.3.2. In addition, congestion causes inconvenience and unreliability for motorised road users and has a significant cost to London's economy. The annual cost of congestion is estimated at around £4.9 billion³ based on the delay faced by people driving. This figure does not account for the cost of congestion on bus passengers and bus operating costs.
- 1.3.3. The MTS sets out that the future of central London must involve a steady reduction in car use as well as specific traffic reduction targets. These include a 10 per cent reduction in freight traffic in the central London morning peak by 2026 and an overall reduction of traffic in London by 10-15 per cent by 2041.⁴
- 1.3.4. In the MTS, the Mayor sets out his commitment to make London a place that is easy for people to walk, cycle and use public transport. He also commits to road space that is carefully managed to prioritise these modes as well as facilitate the efficient and environmentally sustainable movement of essential delivery and servicing vehicles (the Healthy Streets approach). The MTS aims for 80 per cent of journeys to be made by walking, cycling or public transport by 2041; however, this is higher for trips within central London (95 per cent) and between central London and inner / outer London (99 per cent).
- 1.3.5. The objective of the CC scheme is to reduce traffic and congestion within the CCZ. The charge acts as a disincentive to car use in the zone and has a role to play in delivering the mode share aims of the MTS. Lower levels of traffic improve conditions for people walking and cycling and increase the speed and reliability of bus journeys. A shift from car use to sustainable modes contributes to more efficient use of the streets in central London by freight and other essential vehicle trips.
- 1.3.6. The MTS outlines that since the introduction of the CC scheme, the challenges facing central London have changed. It commits the Mayor and us to keeping the CC scheme under review in order to ensure that it remains fit for purpose, as set out in Proposal 20:
- The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.*
- 1.3.7. The MTS vision for central London is that it must remain very well connected, with world class public realm and safe air quality levels. It highlights the importance of bus services and the need to ensure their reliability, while the number of people walking, cycling and using public transport must continue to increase.
- 1.3.8. The MTS highlighted that 15 years after the introduction of the CC scheme, while it remained an integral part of managing road space, the challenges facing central

³ <https://inrix.com/press-releases/2019-traffic-scorecard-uk/>

⁴ Compared to 2015, the base model year of the MTS

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.

- 1.3.9. The CC scheme is kept under review to ensure it remains effective to reduce motorised traffic and support the delivery of the MTS. As a consequence, there have been a number of changes to the scheme since it was first introduced, including the level of charge, penalty charge for non-payment, payment methods available, discounts and exemptions to the scheme, and most recently through the temporary changes that were introduced in response to the transport challenges arising from the COVID-19 pandemic.
- 1.3.10. As explained in the Supplementary Information (Appendix A), we have developed five post-COVID-19 pandemic scenarios of different levels of travel demand. The range of scenarios enables us to make plans in the face of increased uncertainty about how London will look in the future. To enable detailed assessments, we also have developed two forecasts. As is usual in traffic modelling, there is a 'Reference Case', defined in a similar way to pre-pandemic forecasts it assumes no further restrictions are brought in and people start returning to their pre-pandemic routines so that by the time we reach the first forecast horizon (2026) there is no additional behaviour change. There is also a 'Hybrid Forecast', which accounts for the latest evidence on London's recovery and maps a central position in the range of plausible outcomes as defined by the scenarios and is kept under regular review. The latest version assumes slightly slower population growth, more working from home and online shopping and a slower recovery in public transport usage than the Reference Case. In both the Reference Case and Hybrid Forecast, traffic levels, including car use, in central London increase from pre-pandemic levels.
- 1.3.11. A GLA-commissioned report by Arup/Gerald Eve/LSE⁵ published earlier this year on the future of the Central Activities Zone (CAZ)⁶ post pandemic recommends an ambitious step change in inclusive and accessible public realm with increased space for people walking and cycling. To complement this, it outlines the need to remove vehicles from some areas of the CAZ, create large car-free areas, and review the CC scheme to prevent a car-led recovery from the COVID-19 pandemic and ensure traffic levels are kept low.

1.4. Changing the Congestion Charge rules

- 1.4.1. The CC scheme is contained in the Greater London (Central Zone) Congestion Charging Order 2004 ('the Scheme Order', as amended). The Scheme Order effectively sets out the rules of the CC scheme including defining the charging zone, when liability to pay the charge arises, the level of the charge and discounts and exemptions.

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

⁶ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/central-activities-zone>

- 1.4.2. The process for modifying a road user charging scheme is set out in Schedule 23 to the Greater London Authority Act 1999 and is the same as the process which applies when a scheme is first established. We also have regard to Mayoral guidance which has been issued in respect of our discharge of our road user charging powers. Any proposed changes must be contained in an order made by the charging authority (called a variation order) which, if confirmed by the Mayor, will amend the relevant scheme order and, therefore, the rules of the scheme. A consultation is carried out on the proposed changes as reflected in the variation order unless exceptional circumstances apply. The consultation materials usually include the variation order (in draft or formally executed) as well as other relevant information explaining the proposals and what their likely impact will be.
- 1.4.3. After the consultation closes, we prepare a report to the Mayor ('RTM') (this document) on the consultation responses received (including any late responses), which we submit to the Mayor for consideration. The report includes our responses to the issues raised and makes recommendations, where relevant, to the Mayor regarding any changes to the proposals and suggested modifications to the variation order. The Mayor considers the report alongside other relevant documents before deciding whether or not to confirm the variation order, with or without modifications. The Mayor's formal confirmation is done by the execution of an instrument of confirmation (this includes a schedule of variations if there are modifications).
- 1.4.4. On 23 July 2021, we made the Greater London (Central Zone) Congestion Charging (Variation) Order 2021 ('the Variation Order 2021'), which seeks to amend the Scheme Order to give effect to the proposals which have been consulted on. A copy of this Variation Order 2021 is included as an Appendix to the Mayoral Decision Form.

2. Proposed changes consulted on

2.1. Introduction

- 2.1.1. This section provides an overview of the proposals, how they were developed and how they are intended to operate. More detail is provided in the Supplementary Information document at Appendix A.

2.2. History of the Congestion Charge

- 2.2.1. The CC scheme was first introduced in central London on 17 February 2003. Following its introduction, the CC scheme was effective in reducing traffic and congestion in the CCZ. There was a 30 per cent reduction in congestion within the CCZ, and a 15 per cent reduction in circulating traffic. In addition, by reducing the overall volumes of traffic within the CCZ and increasing the efficiency of circulating traffic, the CC scheme was also responsible for a reduction in emissions. This equated to approximately a 12 per cent emissions reduction of both NO_x and PM₁₀ from road traffic and 20 per cent reduction in emission of CO₂ from road traffic, based on a 24-hour average day.
- 2.2.2. As described above, the MTS, published in 2018, noted that traffic and congestion remain a challenge in central London, due in part to the changing make-up of vehicles in the zone. One of the elements discussed was the growth in uncharged vehicles in the CCZ, in particular the rise in the number of private hire vehicles (PHVs). It stated that the number of PHVs entering the CCZ had grown from the 4,000 predicted in 2003 to more than 18,000 daily.
- 2.2.3. In April 2019, the PHV exemption from the Congestion Charge was removed, except for vehicles designated as wheelchair accessible. This had the effect of reducing the number of unique PHVs entering the CCZ in line with expectations when compared to before the exemption was removed.
- 2.2.4. The MTS also sets out that traffic levels are at their highest during weekday evenings, and that weekend traffic levels in the CCZ had become similar to levels on weekdays. Weekday evening and weekend traffic levels are discussed further in Section 2.3.

Temporary changes to the CC scheme

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

The Mayor has committed us to keeping these temporary changes under review having regard to the transport challenges created by the pandemic and taking account of important milestones in the response to the pandemic or significant changes in circumstances.

- 2.2.6. Following the Government's announcement of the progression to Step 4 of the 'Roadmap out of lockdown' on 19 July 2021, we reviewed whether the transport challenges arising from the COVID-19 pandemic were likely to remain beyond Step 4. The following persistent transport challenges were identified:
- a slow return of users to public transport and a general reluctance for people to currently return to using it in the same way and at the same frequency as they did pre-pandemic;
 - temporary changes to roads in the CCZ reducing capacity for motorised traffic, with no immediate plans to return to the pre-pandemic situation; and
 - the return of traffic at a faster rate than public transport use, bringing with it the potential risk of a car-based recovery, with its associated impacts on health, the environment and road danger, as well as the inability of central London's limited road capacity to cope with such an outcome.
- 2.2.7. Our review concluded that the temporary changes to the CC scheme are a necessary response to these persistent challenges. They remain in place as an effective means of managing congestion and the efficient movement of traffic in central London. The intention is that they would be replaced by the proposed changes which have now been consulted on if the Mayor decides to confirm the proposals. The proposed timetable for implementation of the revised CC scheme is 20 December 2021 (for all changes other than the new charging hours and days) and 21 February 2022 (the charging hours and days).

2.3. Summary of the consultation proposals

- 2.3.1. A detailed description of the proposals and their impacts is provided in the Supplementary Information, which is included in Appendix A. The proposals have been developed to further the achievement of the long term aims of the MTS. They also would help to address short to medium term transport challenges. A summary of the proposals and their rationale is below:

A daily charge of £15

- 2.3.2. The current level of the charge is £15, having increased from £11.50 as a temporary measure in June 2020. The proposal is therefore to maintain the current charge level at £15 (the charge will also increase to £17.50 for those paying up to three days later – see Proposal 5).
- 2.3.3. Previous changes to the charge level, prior to the temporary increase introduced in June 2020, took effect in 2014, when it rose from £10 to £11.50; 2011, when it rose from £8 to £10; and 2005, when it rose from £5 to £8.

- 2.3.4. The period between 2014 to 2020 is the longest period in which no increase to the charge has been made, meaning there has been a gradual erosion of the charge's deterrent effect.
- 2.3.5. A £15 charge level is expected to reduce car traffic (measured in total kilometres driven) in the CCZ by around 4 per cent in the proposed new weekday charging hours (07:00 to 18:00), compared to a situation where no changes are made to the pre-pandemic scheme. A £15 charge in the proposed new weekend charging hours (12:00 to 18:00 Saturdays and Sundays) is expected to reduce car traffic by around 15 per cent. This is a significant reduction in an area where road space is heavily constrained and demand is high. The reduction in car usage is expected to result in an increase in sustainable travel to, within and from the CCZ with around 6,000 new trips made by public transport; and 2,000 new walking and cycling trips made each weekday.
- 2.3.6. If the Mayor were to approve this proposal, the change would take effect on 20 December 2021. As noted above, however, customers are in practice currently already paying a £15 charge under the temporary changes.

Weekday charging from 07:00-18:00

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

Weekend charging from 12:00-18:00

- 2.3.11. Prior to the implementation of the temporary changes, there was no charge at weekends. As part of the temporary package, Saturday and Sunday charges were introduced for the same hours as the temporary weekday charging hours: 07:00–22:00. It is now proposed that from 28 February 2022 (revised post-consultation to 21 February 2022), weekend charging hours would be from 12:00–18:00 on Saturdays and Sundays, when traffic is at its highest.
- 2.3.12. As highlighted in the MTS, in 2015 weekend traffic levels in the CCZ were already similar to weekdays.⁷ High traffic levels at the weekends delay bus services and other essential traffic such as freight; make walking and cycling unpleasant and unattractive; worsen air quality and carbon emissions; and lead to increased road danger.
- 2.3.13. The hours in which this increased traffic is observed do, however, differ at the weekends. Although entries to the zone have been higher on Saturdays and Sundays compared to an average weekday, overall traffic levels are lower on weekend mornings. Given the different types of journey, and the times journeys are made at weekends compared to weekdays, shorter charging hours are being proposed at the weekend. This is expected to help mitigate the impact on some individuals, while tackling traffic and congestion during the busiest part of the day.
- 2.3.14. Shorter hours of operation at the weekend could also help to support freight trips that have a positive impact on London's weekend economy.
- 2.3.15. A £15 charge between 12:00 and 18:00 on Saturdays and Sundays is expected to reduce car traffic (measured in total kilometres driven) in newly charged hours by around 15 per cent. As a result, sustainable travel to and in the CCZ is expected to increase. It is estimated that there will be around 8,000 new public transport trips; and a total of 3,000 new walking and cycling trips each day on the weekend.
- 2.3.16. The changes to the weekend charge would be implemented on 21 February 2022 to allow changes to signage and back office systems. These changes would replace the temporary weekend charging hours. In the interim period, the charging hours of 07:00–22:00 on Saturdays and Sundays would remain in place.

Bank Holiday charging from 12:00-18:00

- 2.3.17. Prior to the introduction of the temporary changes in 2020, the Congestion Charge did not apply on bank holidays. However, data from 2019 shows that car and PHV traffic was higher on bank holidays than on an average weekday. Without a

⁷ See Figures 8 and 9 in MTS, 2018: www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf.

charge, there is reduced incentive for these trips to be switched to sustainable modes.

- 2.3.18. On bank holidays, there are likely to be higher proportions of visitors and leisure trips (reflected in the higher car mode share). These can more easily be switched than some other types of trip – such as freight, delivery and servicing – and a charge will reinforce the message that central London road space is tightly constrained across all days of the week. Charging the majority of bank holidays also means that for most of the year, the Congestion Charge will operate seven days a week.
- 2.3.19. The data shows that traffic entries on a bank holiday occur later in the day than on weekdays, and so it is proposed that the charging hours are 12:00–18:00. This is later and for a shorter period than weekdays, and mirrors the proposed weekend charging hours.
- 2.3.20. The impact of the proposal is likely to be similar to that expected at the weekends, with a reduction of around 15 per cent in car kilometres in the newly charged hours with a £15 charge.
- 2.3.21. If this change is confirmed, it would take effect on 21 February 2022. In the interim period, the charging hours of 07:00–22:00 on bank holidays would remain in place (albeit the only bank holidays between the Mayor’s decision and 21 February 2022 are Christmas Day and New Year’s Day, both of which are proposed to be non-chargeable, as described below).

No charge between Christmas Day and New Year’s Day Bank Holiday

- 2.3.22. Prior to the introduction of the temporary changes, the Congestion Charge did not operate during the period between Christmas Day and New Year’s Day (inclusive). The package of temporary changes introduced in summer 2020 extended charging days to include this period.
- 2.3.23. It is now proposed that the period between Christmas Day and New Year’s Day bank holidays, inclusive (including where this falls later than 1 January due to New Year’s Day falling on a weekend), will not be charged, meaning that the situation returns to that which existed pre-pandemic.
- 2.3.24. Unlike bank holidays (when traffic is at a similar or greater level than during working days), traffic levels are normally around 20 per cent lower during the period between Christmas Day and New Year’s Day. Public transport is not available on Christmas Day; and, given the lower traffic levels, trips in the CCZ are likely to have less of an impact on congestion. There is not expected to be a traffic impact from this proposal compared to the pre-pandemic scheme.
- 2.3.25. If the Mayor decides to implement this change, it would take effect on 20 December 2021 meaning that the period from Saturday 25 December 2021 to Monday 3 January 2022 (inclusive) would not be charged.

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

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

£17.50 charge level to pay after the day of travel (up to three days after travel)

- 2.3.31. The current charge for late payments is £17.50, having increased from £14 as a temporary measure in June 2020. The proposal is therefore to maintain the current charge level, to pay after the day of travel at £17.50; and to increase the deadline for making a delayed payment from one day to three days after the day of travel. Failure to pay after that deadline will result in a penalty charge notice (PCN) being issued, as usual.
- 2.3.32. This proposal provides drivers with additional time to pay the charge. It also ensures that the level is set in line with the proposed charge increase; and with the existing difference between the on-the-day charge and the pay-next day-charge (£2.50 difference, with payment due by midnight the day after travel).

- 2.3.33. If the Mayor were to approve this proposal, the change would come into effect on 20 December 2021.

Removing Auto Pay and Fleet Auto Pay discounts

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

Retaining and adapting temporary reimbursement arrangements

- 2.3.39. A 100 per cent reimbursement arrangement for certain NHS staff and patient journeys in the CCZ has been available since the establishment of the CC Scheme in 2003.
- 2.3.40. As part of the temporary changes implemented in summer 2020, the eligibility criteria for the NHS staff and NHS patient reimbursement arrangements were temporarily expanded so that a broader range of journeys came within scope. The changes also introduced new reimbursements for certain care home and local

authority workers, and charity staff and volunteers. TfL reimburses eligible applicants fully for the charge they initially paid.

- 2.3.41. The care home workers' reimbursement arrangement applies to journeys made by staff so that they can provide services during the COVID-19 pandemic on behalf of a care home located in the CCZ. The criteria for the local authorities' and charities' reimbursement arrangements were developed following engagement with local authorities and charities. They apply to local authority employees; domiciliary care workers contracted or funded by local authorities; and charity staff and charity volunteers who are undertaking journeys to directly support vital COVID-19 response work within the CCZ. The criteria also covers journeys made to support the provision of nursing or care services for people who are vulnerable in general, or at particular risk of COVID-19.
- 2.3.42. Under the new proposals recently consulted on, the NHS patient, care home workers, and local authorities and charities reimbursement criteria would be modified so that COVID-19-specific references were replaced with general references to a pandemic or epidemic prevalent in Greater London. The existing reimbursement arrangements would continue seamlessly if the Proposed Changes are implemented so reimbursements would remain available for eligible journeys taken during the current COVID-19 pandemic as well as any future epidemics or pandemics should they ever arise.
- 2.3.43. The NHS staff reimbursement arrangement would continue in its slightly expanded form so that staff do not need to be on call when making their journey, nor be eligible for reimbursement of other travel expenses as part of their employee terms and conditions, in order to claim a reimbursement of the congestion charge during exceptional circumstances created by an epidemic or pandemic. As with the other reimbursement arrangement, the member of staff is reimbursed by the NHS which is in turn reimbursed by TfL.
- 2.3.44. These reimbursements are expected to have a positive impact on specific groups in the exceptional circumstances created by an epidemic or pandemic, but are not expected to have any significant traffic impacts.

Removal of resident online and app payments for consecutive charging days

- 2.3.45. Holders of the residents' discount can currently pay for multiple consecutive charging days by post, call centre, app or online; they may also pay for any number of charging days by Auto Pay.
- 2.3.46. It is proposed that residents' payments for multiple consecutive charging days will no longer be accepted online or via the app. Such payments could still be made by post or via the call centre, and residents would still be able to pay for any number of individual charging days by Auto Pay. No change is proposed to the 90 per cent residents' discount (see Proposal 4, above, related to its reopening to new applications as part of the temporary changes).
- 2.3.47. The number of residents who do not use Auto Pay is relatively small, and the frequency of purchases of multiple consecutive charging days is low. Alternative

payment channels will remain available; therefore, this proposal is not expected to have a significant impact on holders of the residents' discount.

2.3.48. For completeness, it should be noted that no change was made to this facility as part of the temporary changes introduced in summer 2020.

2.3.49. If this change is confirmed, it would take effect on 20 December 2021.

2.4. Integrated Impact Assessment

2.4.1. We commissioned consultants, Jacobs, to carry out an Integrated Impact Assessment (IIA) of the proposed changes to the CC scheme. An assessment was undertaken on the impacts of the proposals as a whole. The IIA report was published as part of the consultation materials, and is included as part of Appendix C.

2.4.2. The assessment was set out under the themes of London's people (including health and equalities assessment), London's economy, and London's environment. The impacts identified are based on a comparison of the consultation proposals and the pre-pandemic CC scheme, rather than the CC scheme as temporarily changed in June 2020 in response to the circumstances created by the COVID-19 pandemic. This methodology ensures that the IIA assesses the full potential impact of the proposed changes and removes any distortion that would have resulted in assessing a consultation proposal which is the same as a temporary change.

2.4.3. Included within the IIA, and assessed using the same methodology, were the impacts on equalities and protected characteristics, and this is summarised separately below in 2.5.

2.4.4. A summary of the key findings is set out in Table 1.

Table 1: Summary of IIA

Theme / Topic	Description of Impact	Impact rating	Existing mitigation/ enhancement	Potential further mitigation/ enhancement
Environment				
Air Quality	Minor reduction (approximately 1.5 per cent) in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within central London.	+1 Minor Positive	Ultra Low Emission Zone (ULEZ), Low Emission Zone (LEZ)	N/A
Climate Change	Minor reduction (approximately 1.5%) in annual	+1 Minor Positive	ULEZ, LEZ	N/A

Theme / Topic	Description of Impact	Impact rating	Existing mitigation/ enhancement	Potential further mitigation/ enhancement
	emissions of CO2 within central London.			
People				
Air Quality, Health and Health Inequalities	Reduction in pollutant emissions leading to positive health outcomes particularly for people living in the boroughs within the CCZ.	+1 Minor Positive	ULEZ, LEZ	N/A
Noise	Potential reduction in noise levels likely to be imperceptible.	0 Neutral	ULEZ, LEZ	N/A
Connectivity	Increase in active travel in central London.	+1 Minor Positive	Streetspace schemes, Low Traffic Neighbourhoods	Further targeted roll out of existing measures.
	Improvement in bus journey times and reliability.	+1 Minor Positive	N/A	N/A
	Potential increase in crowding on public transport.	-1 Minor Negative	N/A	N/A
Access to health and social care and other social infrastructure	Impact upon access to health and social care services within the CCZ for people on low incomes travelling by motorised vehicle.	0 Neutral	Cheaper alternative modes of transport available.	N/A
	Increased cost of access to healthcare during weekend charging hours for older people and disabled people unable to use public transport or active travel.	0 Neutral	Blue Badge holders can nominate up to two vehicles per day to receive 100 per cent discount Designated Accessible PHVs remain	Raise awareness of eligibility for extended NHS Patient Reimbursement Scheme through NHS Trusts.

Theme / Topic	Description of Impact	Impact rating	Existing mitigation/ enhancement	Potential further mitigation/ enhancement
			exempt. Disabled tax class vehicle exemption. NHS Patient reimbursement scheme.	
	Impact upon pregnant women, accessing the CCZ who cannot use public transport or active travel for medical appointments.	0 Neutral	NHS Patient Reimbursement Scheme.	Clarify and communicate eligibility of pregnant women for NHS Patient Reimbursement Scheme through NHS Trusts.
	Increased cost of providing privately funded or voluntary care requiring access by private vehicle.	-1 Minor Negative	Residents' discount (for those living in the CCZ) Blue Badge holders can nominate up to two vehicles per day to receive 100 per cent discount	N/A
	Increased cost of access to attend religious services during weekend charging hours in the CCZ for those unable to travel by public transport or attend at other times.	-1 Minor Negative	9+ seat minibus exemption Blue Badge discount Existing parking charge exemptions at weekends at certain places of worship	TfL to encourage faith organisations to consider 'shuttle services' to provide access into the CCZ for religious services.
Accessibility	Increased costs for disabled drivers – particularly at weekends – who do not qualify for blue badge.	-1 Minor Negative	Designated wheelchair accessible PHVs and taxis remain exempt 2019 changes to Blue Badge eligibility for	TfL to raise awareness of discounts available.

Theme / Topic	Description of Impact	Impact rating	Existing mitigation/ enhancement	Potential further mitigation/ enhancement
			'hidden' disabilities.	
Access to work and training	Financial impact for people in low income jobs in retail, hospitality and leisure who need to travel to work by private transport during weekend charging hours.	-1 Minor Negative	N/A	N/A
	Increased costs to PHV drivers unable to spread additional costs across multiple trips.	-1 Minor Negative	Cleaner vehicle discount (until 2025). Designated Wheelchair Accessible PHVs remain exempt. Blue Badge holders can nominate two vehicles to receive 100 per cent discount. Ability to pass on increased costs to passengers, in whole or in part	N/A
	Impact for people that drive to weekend school/ adult education and education offered by faith groups within CCZ.	0 Neutral	School buses and minibuses of 9+ seats are exempt from the charges, which could be used to provide access into the CCZ for weekend school sports fixtures or other group activities.	N/A

Theme / Topic	Description of Impact	Impact rating	Existing mitigation/ enhancement	Potential further mitigation/ enhancement
Health and Health inequalities	Impact upon mental and physical health due to a reduction in traffic making the streets more attractive to socialise/walk/cycle on.	+1 Minor Positive	TfL and borough initiatives to improve streetspace for walking and cycling.	Further targeted roll out of active travel measures.
Social Integration	Financial impact on charities delivering mobile services (or requiring transportation of goods/equipment) to vulnerable people during weekend charging hours.	-1 Minor Negative	N/A	Consider further reimbursement eligibility or exemption.
	Impact on community groups operating within the CCZ.	0 Neutral	Likely to be resident of CCZ and qualify for discount or be able to use active or sustainable travel modes.	N/A
Safety and Crime	No impacts related to surveillance of illegal driving and other antisocial behaviour as the Proposed Changes will not introduce measures of relevance.	0 Neutral	N/A	N/A
	Reduction in travel by individuals with a fear for their safety on public transport, walking or cycling.	-1 Minor Negative	CCTV coverage and patrolling of public transport by Metropolitan Police Service, British Transport Police and City of London Police.	Additional targeted campaigning and outreach be undertaken in relation to perceptions of safety on public transport for

Theme / Topic	Description of Impact	Impact rating	Existing mitigation/ enhancement	Potential further mitigation/ enhancement
			Mayor's Tackling Violence Against Women and Girls Strategy Targeted campaigns such as tackling hate crime on the public transport network.	community groups.
	Improvements in road safety as a result of a reduction in congestion.	+1 Minor Positive	Police enforcement and existing TfL campaigns and communication strategies. Introduction of 20mph speed limits.	N/A
Health and Health inequalities	Short-term impact upon people with underlying health conditions vulnerable to coronavirus travelling by public transport as they are not eligible for reimbursements	-1 Minor Negative	Enhanced cleaning regime in stations and on public transport vehicles. Targeted campaigning to continue to be undertaken in relation to perceptions of safety on public transport in relation to coronavirus.	It is recommended that the temporary changes scheme criteria for NHS patients that are assessed as being at high or moderate risk from coronavirus is maintained.
Economy				
Employment	Neutral impacts overall, with potential for minor	Neutral	Placemaking, streetspace and	Further enhancement of urban realm and

Theme / Topic	Description of Impact	Impact rating	Existing mitigation/enhancement	Potential further mitigation/enhancement
	impacts for some sectors (retail, accommodation and food services and arts, entertainment and recreation).		active travel measures	provision for increase in active travel within central London from public transport hubs to destinations.
Business	Neutral impacts overall, with potential for both minor negative and positive impacts for some sectors (retail, accommodation and food services and arts, entertainment and recreation).	Neutral	Placemaking, streetspace and active travel measures	Further enhancement of urban realm and provision for increase in active travel within central London from public transport hubs to destinations.
London's Wider Economy	Wider supply chains will be not be affected by the Proposed Changes	Neutral		N/A

2.5. Protected characteristics and equalities

- 2.5.1. Under s149 of the Equality Act 2010 ('the Equality Act'), as public authorities, the Mayor and TfL must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not, when exercising their functions. This is known as the Public Sector Equality Duty. Protected characteristics under the Equality Act are age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination and other conduct prohibited under the Act only). In line with best practice, the impact on groups who also have the potential to be socially excluded, in this case, people on low incomes or from deprived communities, has also been considered notwithstanding that these specific attributes are not protected under the Equality Act but may be common to people with protected characteristics.
- 2.5.2. The Public Sector Equality Duty applies to the Mayor's decision to confirm the variation order.

- 2.5.3. In the IIA, the 'people' category includes an assessment of protected characteristic groups. This enabled Jacobs to assess how the proposals could impact each of the protected characteristic groups. This assessment is summarised below and the full assessment is available in the IIA.

Age

- 2.5.4. The IIA identified minor positive impacts for young people and children, and older people as a result of an improvement to air quality. It also identified minor positive benefits for older people in terms of connectivity, accessibility and social integration as a consequence of greater uptake of active travel and faster bus journey times. Both older and younger people could experience a minor positive impact from the reduction in traffic and its consequent benefits in terms of safety and perceptions of safety.
- 2.5.5. The IIA identified a neutral impact on older people in terms of their access to healthcare in the CCZ, noting that this group may need to make more trips for this purpose but also that, where these are undertaken by car, discounts and reimbursements may apply. It identified a neutral impact on children and young people accessing education. This was based on the fact that there are education facilities (including those associated with religious activities) in the CCZ but that many only offer parking to disabled people (thereby limiting the numbers of trips by car); most trips can be switched to public transport or active travel; and for students whose trips originate in areas of low public transport availability, there would be the option to drive to a station and continue the journey into the zone by public transport.
- 2.5.6. In terms of potential negative impacts, the IIA identified a minor negative impact on older people who are dependent on car-based informal care services. It also identified a minor negative impact on young people in terms of crime reduction and community safety, as they may not feel safe using public transport if they switch from regular car use.

Disability

- 2.5.7. The IIA identified minor positive health impacts for disabled people with chronic conditions who live and travel within the CCZ, due to the reduction in pollutant emissions with the Proposed Changes in place. Reductions in noise levels may have differential beneficial impacts for disabled people that who are hypersensitive to loud sounds, such as those with autism.
- 2.5.8. The IIA identified minor positive benefits for disabled people in terms of maximising accessibility by bus, although there could also be minor negative benefits from bus crowding.
- 2.5.9. The IIA identified a neutral impact on disabled people in terms of their access to healthcare in the CCZ, noting that this group may need to make more trips for this purpose but also that, where these are undertaken by car, discounts and reimbursements may apply.

- 2.5.10. The IIA identified minor negative impacts for disabled people who travel in the CCZ by car but do not qualify for discounts or exemptions (e.g. Blue Badge), and for disabled people who rely on car-based informal care services.
- 2.5.11. In terms of crime reduction and community safety, it identified minor negative impacts for disabled people if they switch to public transport as a result of the changes if they feel less safe using this mode than the car. It identified minor positive impacts for disabled people from a potential reduction in road traffic collisions, as this group is more likely to use active travel modes including public transport.

Sex

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

Race

- 2.5.14. The IIA identified minor positive impacts for people from Black, Asian and Minority Ethnic (BAME) groups as a result of the improvements to air quality brought about by the proposals. This group is more likely to be exposed to and/or affected by poor air quality. There are also minor positive impacts in terms of the experience of using buses for this group.
- 2.5.15. In terms of crime reduction and community safety, the IIA identified minor negative impacts if people chose to switch to public transport and felt less safe doing so, and potential minor positive effects in terms of reduced road traffic collisions. The IIA also identified a potential minor negative impact to some PHV drivers (those that work for PHV operators who are not able to change their fares in response to changes).

Pregnancy and maternity

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

Religion or belief

- 2.5.18. The IIA identified minor negative potential impacts, owing to increased cost of access to attend religious services during weekend charging hours in the CCZ for those unable to travel by public transport or attend at other times.

Gender reassignment

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

Sexual orientation

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

Other impacts

- 2.5.21. The IIA also identified other likely significant impacts relevant to protected characteristics. It noted that there could be a short-term minor negative impact on people who are more vulnerable to COVID-19 owing to underlying medical conditions, if these people are travelling by public transport.

Deprivation

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

Considering the impacts and potential mitigations

- 2.5.24. In shaping the proposals, we have carefully considered the potential impacts as identified by the IIA (including those on groups with protected characteristics), alongside the likely impacts on traffic and congestion and the other objectives of the MTS. This enabled a consideration in the round of the potential benefits and disbenefits of the proposals. Additionally, we have considered the issues raised by

respondents to the consultation, some of which reflect the findings of the IIA and some of which raise further issues.

- 2.5.25. In terms of traffic impacts, these have been assessed for both weekdays and weekends. A £15 charge level is expected to reduce car kms in the CCZ by around four per cent between 07:00-18:00 on weekdays, compared to a situation where no changes were made to the pre-pandemic scheme. At weekends, a £15 charge between 12:00-18:00 on Saturdays and Sundays is expected to reduce car kms in newly charged hours by around 15 per cent compared to a situation where no changes were made to the pre-pandemic scheme. This is a significant reduction in an area where road space is heavily constrained and demand is high. The reduction in car usage is expected to result in an increase in sustainable travel to, within and from the CCZ with around 6,000 new trips made by public transport and 2,000 new walking and cycling trips made each weekday.
- 2.5.26. As outlined above, both positive and negative impacts from the proposed changes have been identified, and Jacobs has put forward potential mitigations. In summary, the mitigations identified are: the existing discounts such as Blue Badge 100 per cent Discount (noting that the criteria for Blue Badge itself recently changed to encompass certain 'hidden' disabilities, and that the discount allows for up to two vehicles to be nominated, including PHVs) and the 9+ seater vehicle 100 per cent Discount (which could be used for charity minibuses, for example), the NHS Reimbursement and the exemption for designated wheelchair accessible PHVs. A further mitigation is the fact that parking charges do not apply at certain religious sites at the weekend.
- 2.5.27. The IIA also identified potential further actions that TfL and others could take to enhance the mitigations. These included: raising awareness of the NHS reimbursements (including for pregnant women) and other discounts and exemptions; for TfL to encourage faith groups to set up 'shuttle services' for travel to and from venues in the CCZ; and for continued enhancements to public realm and active travel.
- 2.5.28. Impacts and mitigations are discussed in more detail – and in the context of the responses received to the consultation – in Chapter 5.

3. Consultation process

3.1. Introduction

- 3.1.1. This chapter provides an overview of the consultation that was undertaken, including the methods used to publicise the consultation. The primary objective of the consultation was to obtain the public and stakeholders' views on the proposed changes to the Congestion Charge including whether the impacts had been accurately assessed. Views were also sought on the importance of reducing traffic and encouraging an uptake of sustainable modes.
- 3.1.2. Statutory guidance issued by the Mayor as to how we expected to exercise our road user charging powers was taken into account and informed how the consultation was conducted.
- 3.1.3. The consultation ran for ten weeks, opening on 28 July 2021 and closing on 6 October 2021.

3.2. Publicising the consultation

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

Email campaign

- 3.2.2. In total, we sent emails to 1.2 million customers on our Customer Relationship Management (CRM) system and 1,800 emails to stakeholders.
- 3.2.3. Emails were sent at the start of the consultations, and a reminder email was sent to stakeholders three weeks before the close of the consultation.
- 3.2.4. Copies of the emails we sent are in Appendix B.

Leaflets to residents living in the Congestion Charge zone

- 3.2.5. We sent 136,000 postcard leaflets at the start of consultation to residents living in the CCZ as they would be directly affected by the proposals. The leaflet is included in Appendix B.

Press advertising

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

Table 2: Press titles where we advertised the consultation

Press titles	Insertion dates
Camden New Journal	12 August 2021
Docklands and East London Advertiser	12 August 2021
Islington & Hackney Gazette Series	12 August 2021
Islington Tribune	13 August 2021
Southwark News	12 August 2021
Wandsworth & Wimbledon Times	11 August 2021
West End Extra	14 September 2021
KCW Today (Kensington, Chelsea and Westminster)	19 August 2021
Wharf Life	18 August 2021

- 3.2.7. There was a feature about the consultation in the Metro on the TfL Travel pages. This feature appeared on 29 July, 9 August and 27 September. A copy is included in Appendix B.
- 3.2.8. We published a notice in the London Gazette that the variation order had been made and invited representations to be made on the proposed changes included in the variation order, as recommended by the mayoral guidance. The notice appeared on 28 July 2021 and a copy is included in Appendix B.
- 3.2.9. We issued a press release on 28 July 2021 to promote the launch of the consultation. A copy of the press release is included in Appendix B.

Digital advertising

- 3.2.10. We used several digital advertising tools to promote the consultation. These were principally 'pop-up' adverts aimed at people browsing the internet or who, through their browsing history (for example visiting travel or traffic-related websites), we judged would have a potential interest in our consultation. The adverts would direct anyone with an interest in our consultation to our online consultation portal. We also sponsored keyword searches in Google so that a link to our consultation webpage would be returned as the first link in a search using terms that were related to our consultation. Copies of these adverts are included in Appendix B.

Radio adverts

- 3.2.11. We advertised the consultation through a digital radio advert. The script of the advert is included in Appendix B.

Stakeholder engagement

- 3.2.12. On the day of the launch of the consultation we contacted stakeholders to provide them with information about the consultation. We contacted MPs, Assembly Members, local councillors and officers. We also contacted a diverse range of stakeholders including businesses, taxi and private hire representative organisations, freight representative organisations and community groups. A list of the stakeholders we contacted is included in Appendix F.
- 3.2.13. We contacted all the stakeholders we had emailed at the start of the consultation again by email on 14 September 2021, to remind them that the consultation would be closing in three weeks and to encourage them to submit a response if they had not already done so.
- 3.2.14. We also had meetings with a number of stakeholders who requested to meet with us. These took place online⁸ as set out in Table 3 below.

Table 3: List of stakeholder meetings

Stakeholder	Date of meeting
Faith organisations (mainly churches) based in CCZ – see list in Chapter 5	14.10.21
Zipcar	11.10.21
CoMoUK	12.10.21

3.3. Consultation materials and channels for responding

- 3.3.1. We described the proposed changes to the Congestion Charge via our online consultation portal, in common with all other TfL consultations.⁹ The portal included a questionnaire which respondents could complete if they wished. Our consultation portal included the following information to help respondents to come to an informed point of view:
- A summary of the proposed changes
 - A map of the CCZ
 - Frequently Asked Questions
 - Easy read versions of the materials and survey
 - British Sign Language video and audio
 - Supplementary Information, which contained more detailed information on the proposed changes to the CC scheme and why we are proposing them
 - An Integrated Impact Assessment
 - The variation order, setting out the legal basis for the proposed changes
 - A copy of the online consultation questionnaire to return to the Freepost address

⁸ This consultation took place in the context of the COVID-19 pandemic. In order to minimise the risks associated with in-person meetings, we prioritised online meetings and phone calls with stakeholders.

⁹ www.haveyoursay.tfl.gov.uk/congestion-charge-changes

- 3.3.2. Our consultation questionnaire (included in Appendix B) consisted of a series of closed questions and two open questions, as follows:
- Closed questions asking respondents to rate how important they felt it was for us to reduce congestion and how effective the proposed changes would be at achieving the aims
 - Open questions providing respondents with the opportunity to raise any further comments on the proposed changes and possible impacts from them
 - A further series of closed questions to understand respondents' experience and travel within the CCZ
 - A range of demographic questions, which were asked through the registration process for the consultation
 - Closed questions about how respondents considered aspects of the quality of the consultation, as well as an open question for comments
- 3.3.3. Respondents were free to submit a response to the consultation by completing our online consultation questionnaire, in writing to our email address ccyourview@tfl.gov.uk, or Freepost address FREEPOST TFL HAVE YOUR SAY.

3.4. Analysing the outcomes

- 3.4.1. We commissioned AECOM, an independent consultancy, to analyse the consultation responses. All closed questions were reviewed and the results tabulated and reported. All open questions, where respondents provided comments, were read and analysed in detail. All comments and suggestions received, whether by email, letter or through our online questionnaire were reviewed in order to identify the issues raised by respondents (please see Chapter 4 and Chapter 5 for a summary of this analysis).
- 3.4.2. AECOM developed a 'code frame' for the two open questions. A code frame is a list of the issues raised during the consultation; together with the frequency each was raised. Every open text response was analysed and either a new code was created or the response was added to one or more of the existing codes within the code frame. Each response could be coded into multiple codes, depending on the number of issues raised by the individual. A code was created for each substantive point raised. Where it was determined that a comment was providing context to an issue, rather than forming a separate point, these did not form a separate code.
- 3.4.3 AECOM found there was considerable overlap between the responses to the two open questions. It was agreed therefore to analyse the two questions together and a code frame was developed which covered both.
- 3.4.3. The coding was carried out by highly experienced coders and underwent checks for consistency.

4. Consultation responses

4.1. Introduction

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

4.2. About the respondents

Type of respondent

- 4.2.1. A total of 9,680 responses were received, of which 92 were stakeholders. Respondents represented the following (NB respondents can be represented in more than one group):

Table 4: Respondent types

Respondent type	Count
A resident in the Congestion Charge zone	1,925
A local business owner	538
A visitor to the area	2,830
A commuter to the area	3,173
Not local but interested in the scheme	767
A taxi (black cab) driver	31
A private hire vehicle driver	389
Employed locally	2,312
Other	1,119

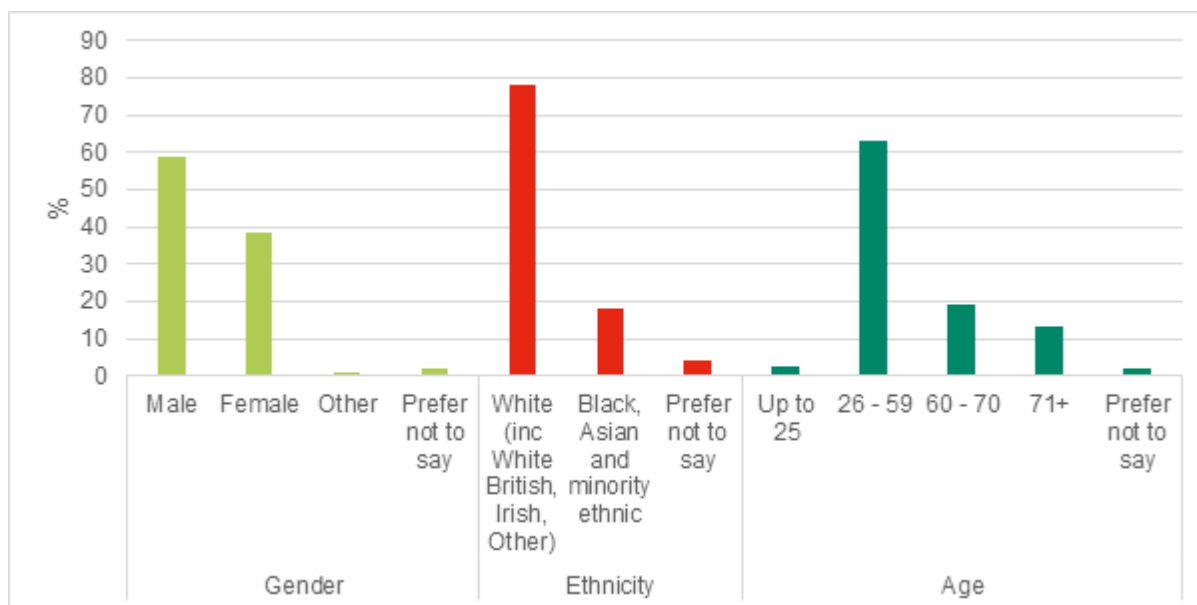
- 4.2.2. For analysis purposes, we have split those employed locally into two categories:
- Employed locally and a resident (482)
 - Employed locally and not a resident (1,830)
- 4.2.3. Not everyone (1,189 respondents) provided this information.

Respondent profile

- 4.2.4. Respondents provided details about themselves such as age, gender and ethnic origin. These questions were optional, and only around a third of respondents chose to provide this information. The percentages in Figure 1 are of those who

provided this information and not of all respondents. Therefore, any difference in response by demographic profile should be treated with caution.

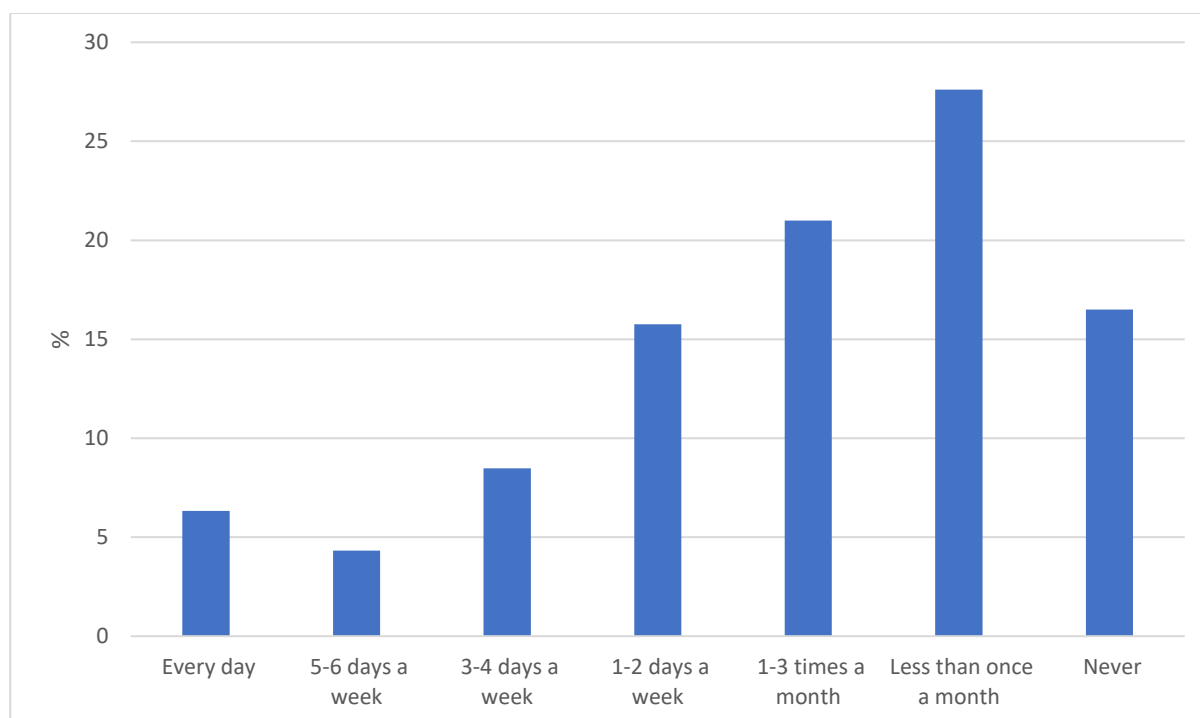
Figure 1: Respondent profile



Base: all respondents who provided demographic information (Gender 2785; Ethnicity 2802; Age 2808).

4.2.5. Other information was also gathered from respondents that could influence their opinion, including frequency of driving within the Congestion Charge zone.

Figure 2: How often do you drive in the Congestion Charge zone?

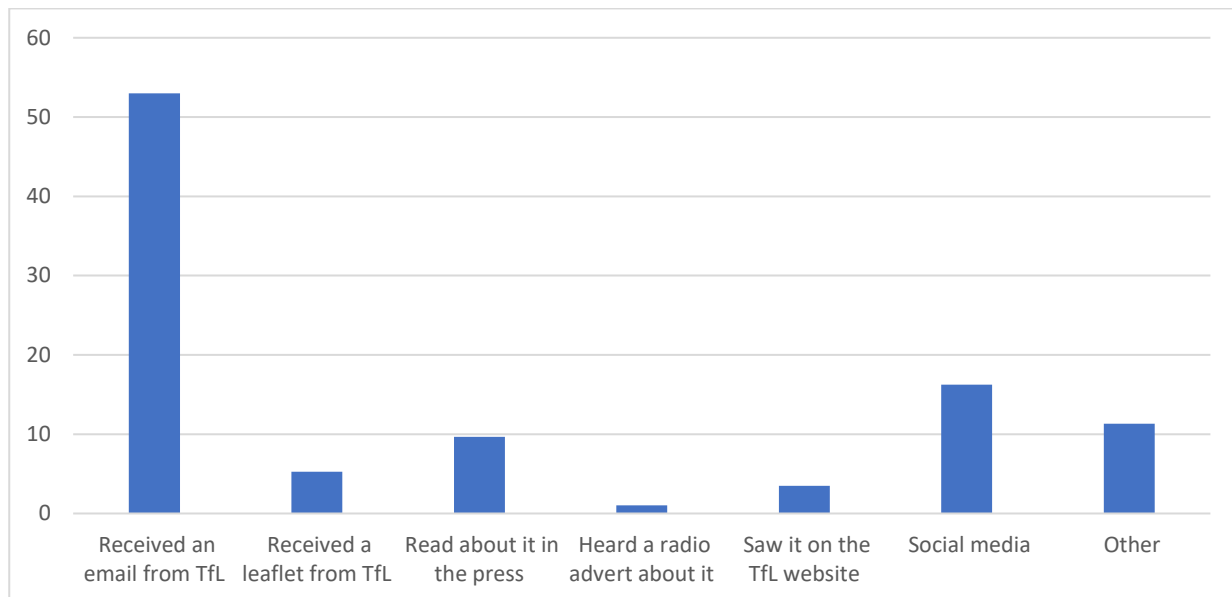


Base: 8589

How respondents heard about the consultation

- 4.2.6. As part of a process to monitor and improve methods of communication to the public, we asked respondents how they heard about the consultation. Of those that responded, more than half (53 per cent) had received an email from us inviting them to take part.

Figure 3: How did you hear about this consultation (the main way you heard)?



Base: 8600

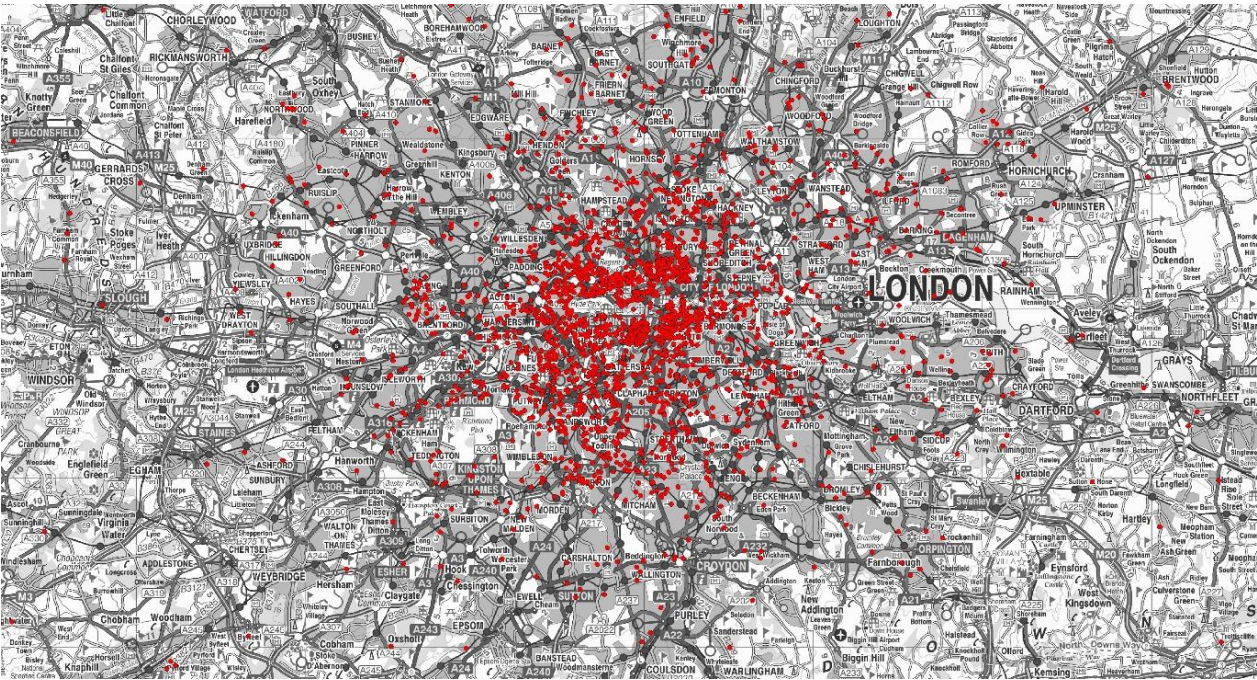
Respondent location

A total of 2,642 respondents (25 per cent) provided a postcode. The vast majority of these were from the Greater London area.

Figure 4 shows the location of respondents and

4.2.7. Table 5 is a breakdown of Greater London respondents by London Borough.

Figure 4: Respondent location map



Contains OS data © Crown copyright and database right 2021

Table 5: Respondent location

Location	Count	%
Barking and Dagenham	19	1%
Barnet	59	2%
Bexley	27	1%
Brent	28	1%
Bromley	29	1%
Camden	143	5%
City of London	42	2%
City of Westminster	387	15%
Croydon	43	2%
Ealing	55	2%
Enfield	24	1%
Greenwich	30	1%
Hackney	72	3%
Hammersmith and Fulham	102	4%
Haringey	36	1%
Harrow	14	1%
Havering	17	1%
Hillingdon	24	1%
Hounslow	31	1%
Islington	146	6%
Kensington and Chelsea	137	5%
Kingston upon Thames	19	1%
Lambeth	200	8%
Lewisham	76	3%
Merton	53	2%
Newham	33	1%
Redbridge	31	1%
Richmond upon Thames	58	2%
Southwark	189	7%
Sutton	13	<1%
Tower Hamlets	63	2%
Waltham Forest	37	1%
Wandsworth	222	8%
Outside Greater London	183	7%
Total	2,642	100%

4.3. Petitions and campaigns

Petition

- 4.3.1. One respondent informed us by email of an online petition they had organised which 43 people signed online. The email included the names and postcodes of the people who had signed the petition. The petition stated:

No Congestion Charge at weekends' Petition

To: Sadiq Khan - London Mayor

Not to introduce the Congestion Charge on weekends and Public Holidays

Why is this important?

To introduce the Congestion Charge at the Weekends and Public Holidays for the first time ever since its inception, of £15 per day (in line with the proposed increases and conditions for week day use) will have a catastrophic effect on the lives of countless millions who travel in London for Leisure, entertainment, cultural and sporting events, sightseeing, social and recreational reasons, for museums and galleries, to attend religious worship for all Faiths.

This very discriminatory proposal will represent a huge financial tax on Londoners and the many other motorists and families from outside London in particular, who will be priced out of visiting. The disastrous effect of the serious lack of tourists and visitors to London during the Pandemic, especially on the commercial, hospitality, entertainment, transport, sport, religious and cultural institutions demonstrated how essential they were for the benefit and welfare of London Life. Now the weekends, which have traditionally attracted many such visitors will soon see that the imposition of the Charge will have a very detrimental effect of starving London of the usual weekend visitors and the subsequent support they formerly gave to the unique vibrant life of our Capital City.

Campaign

- 4.3.2. There was one campaign around the impact on churches. Fifty-three respondents sent emails using this text. Given the relatively small numbers involved we have treated these as individual responses to the consultation. An example of the response is given below:

TFL CONGESTION CHARGE CONSULTATION

I am writing to respond to the TfL Congestion Charge consultation.

My name is XXXX XXXX

My postcode is XXXX XXX

I would like to make the following comments as set out below

Proposed Daily charge of £15: There should be no charge for the weekend to allow those attending concerts at the Cathedral and local residents and parishioners to travel without incurring a charge. The charge for the weekdays should be reduced to the pre-pandemic rate of £11.50.

Proposed hours of operation of between 07:00 - 18:00 Monday to Friday and between 12:00 - 18:00 at weekends (Saturday and Sunday) and Bank holidays: The charge should not operate on the weekends to allow those attending concerts at the Cathedral and local residents and parishioners to travel without incurring a charge.

No charge between Christmas and New Year: I support this.

A discount of 90% for residents living in the Congestion Charge zone: I support this.

Blue Badge holders' rules will not change as they do not pay the congestion charge: I support this.

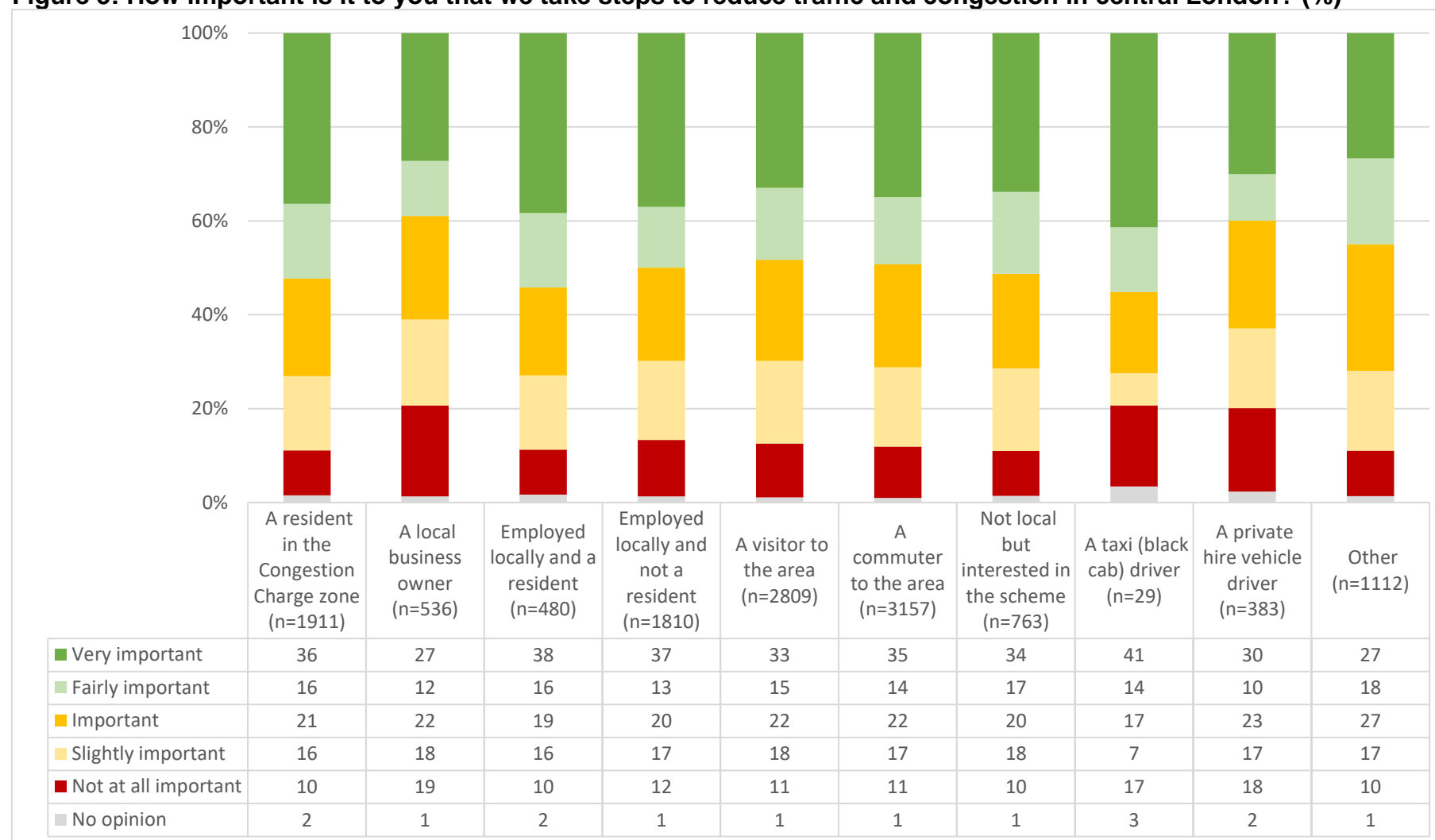
4.4. Importance of reducing traffic and congestion in central London

4.4.1. We asked respondents how important they felt it was to reduce traffic and congestion in central London. Results are shown in Table 6 and **Figure 5**.

Table 6: How important is it to you that we take steps to reduce traffic and congestion in central London?

	All responses	Public	Stakeholder *
Very important	33%	33%	55%
Fairly important	16%	16%	11%
Important	22%	22%	23%
Slightly important	17%	17%	9%
Not at all important	11%	11%	2%
No opinion	1%	1%	0%
Total	8,601	8,557	44
Base: all respondents (1,031 public; 48 stakeholders; 1,079 total did not answer this question)			
*Only includes 44 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution			

Figure 5: How important is it to you that we take steps to reduce traffic and congestion in central London? (%)



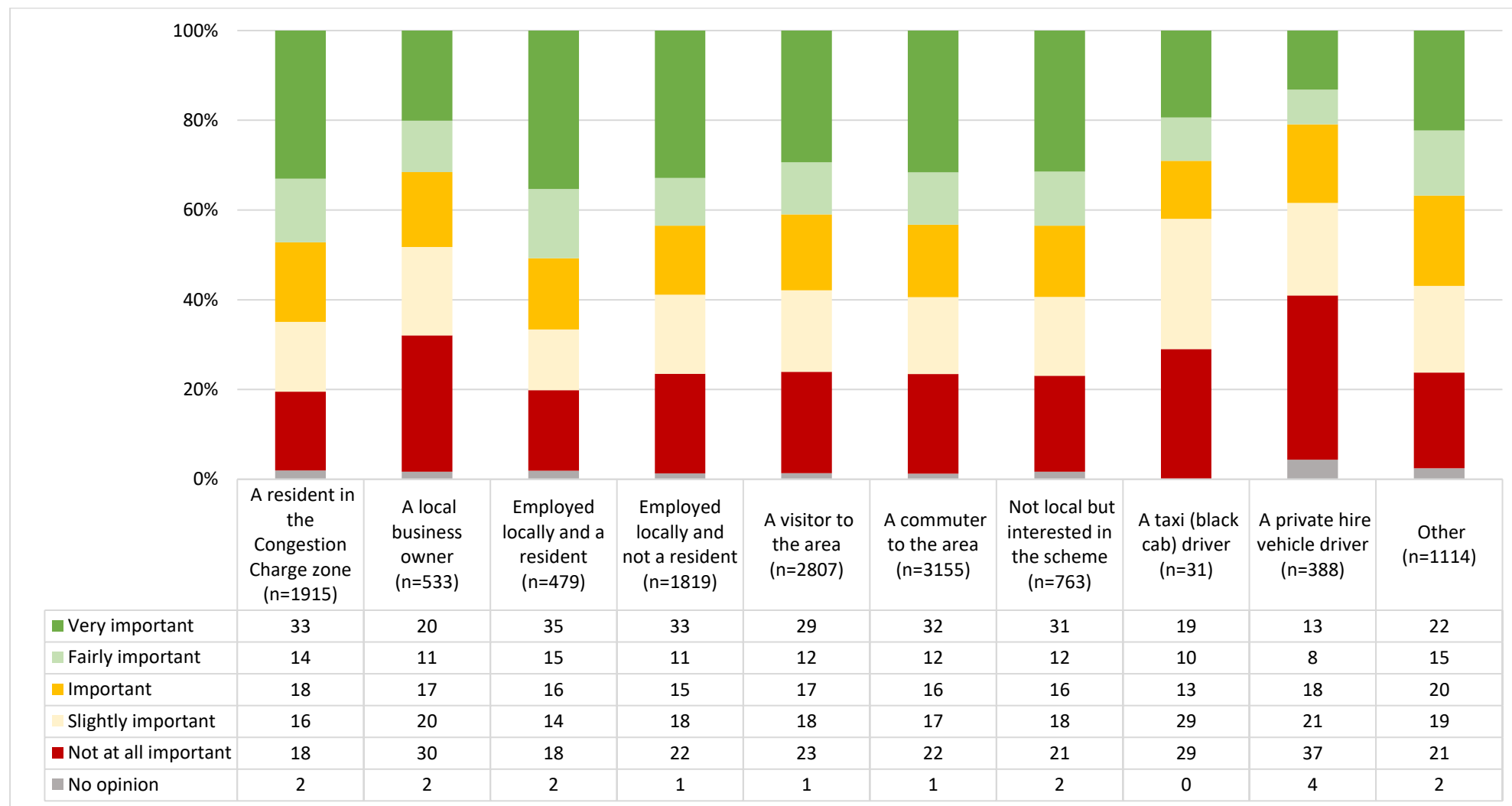
4.5.Importance of increasing the number of people walking, cycling and using public transport in central London

4.5.1. We asked respondents how important they felt it was to increase the number of people walking, cycling and using public transport in central London. Results are shown in Table 7 and Figure 6.

Table 7: How important is it to you that we take steps to increase the number of people walking, cycling and using public transport in central London?

	All responses	Public	Stakeholder *
Very important	28%	28%	43%
Fairly important	13%	13%	14%
Important	18%	18%	23%
Slightly important	18%	18%	11%
Not at all important	22%	22%	7%
No opinion	2%	2%	2%
Total	8,601	8,557	44
Base: all respondents (1,031 public; 48 stakeholders; 1079 total did not answer this question) *Only includes 44 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.			

Figure 6: How Important is it to you that we take steps to increase the number of people walking, cycling and using public transport in central London? (%)



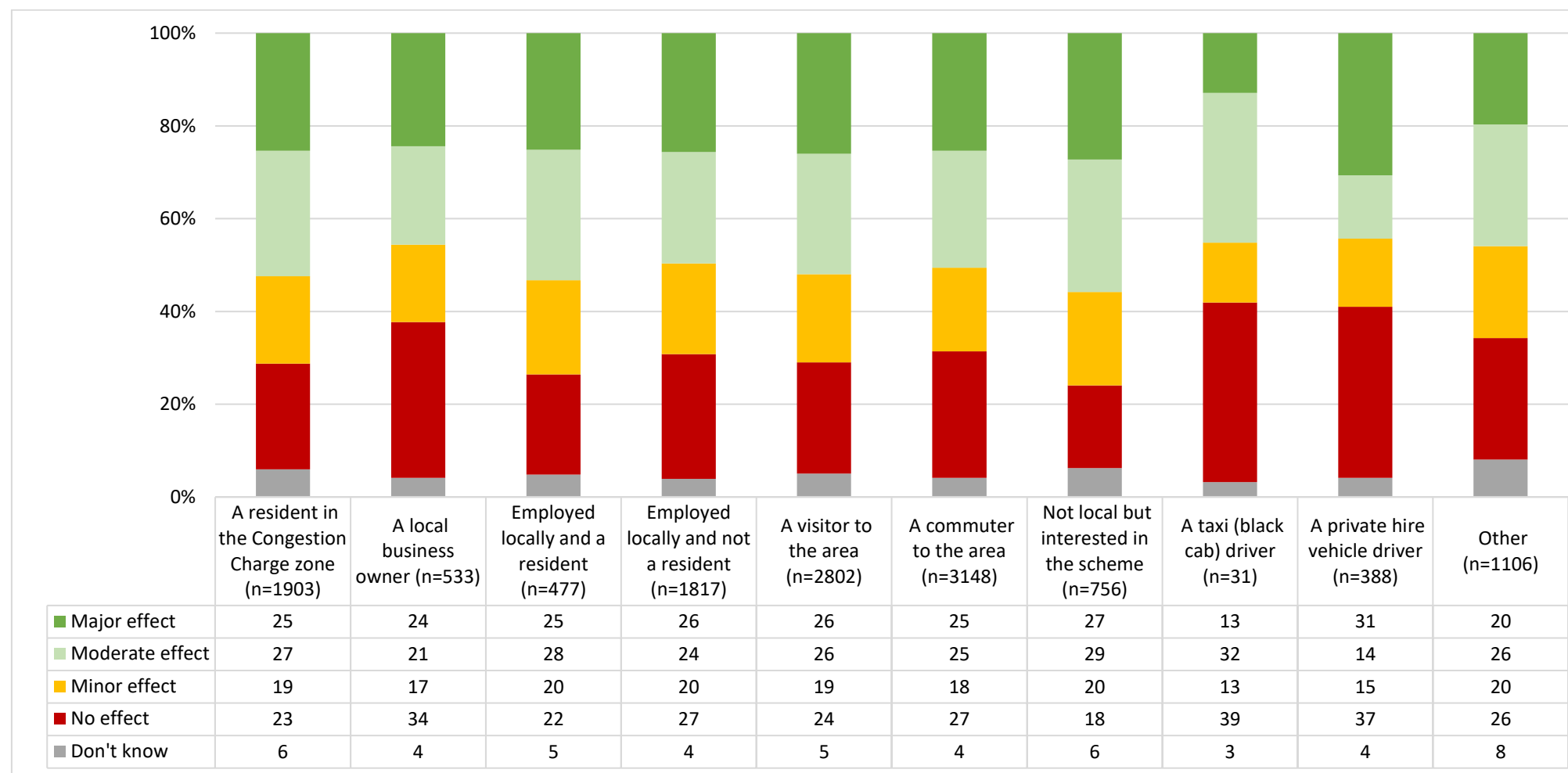
4.6. Effectiveness of setting the level of the Congestion Charge at £15

4.6.1. We asked respondents how effective they thought setting the charge level at £15 would be in achieving our aims. Results are shown in Table 8 and Figure 7.

Table 8: How effective would setting the level of the Congestion Charge at £15 be in achieving our aims?

	All responses	Public	Stakeholder *
No effect	25%	25%	28%
Minor effect	19%	19%	9%
Moderate effect	26%	26%	40%
Major effect	25%	25%	21%
Don't know	5%	5%	2%
Total	8,568	8,525	43
Base: all respondents (1063 public; 49 stakeholders; 1,112 total did not answer this question)			
*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.			

Figure 7: How effective would setting the level of the Congestion Charge at £15 be in achieving our aims (%)



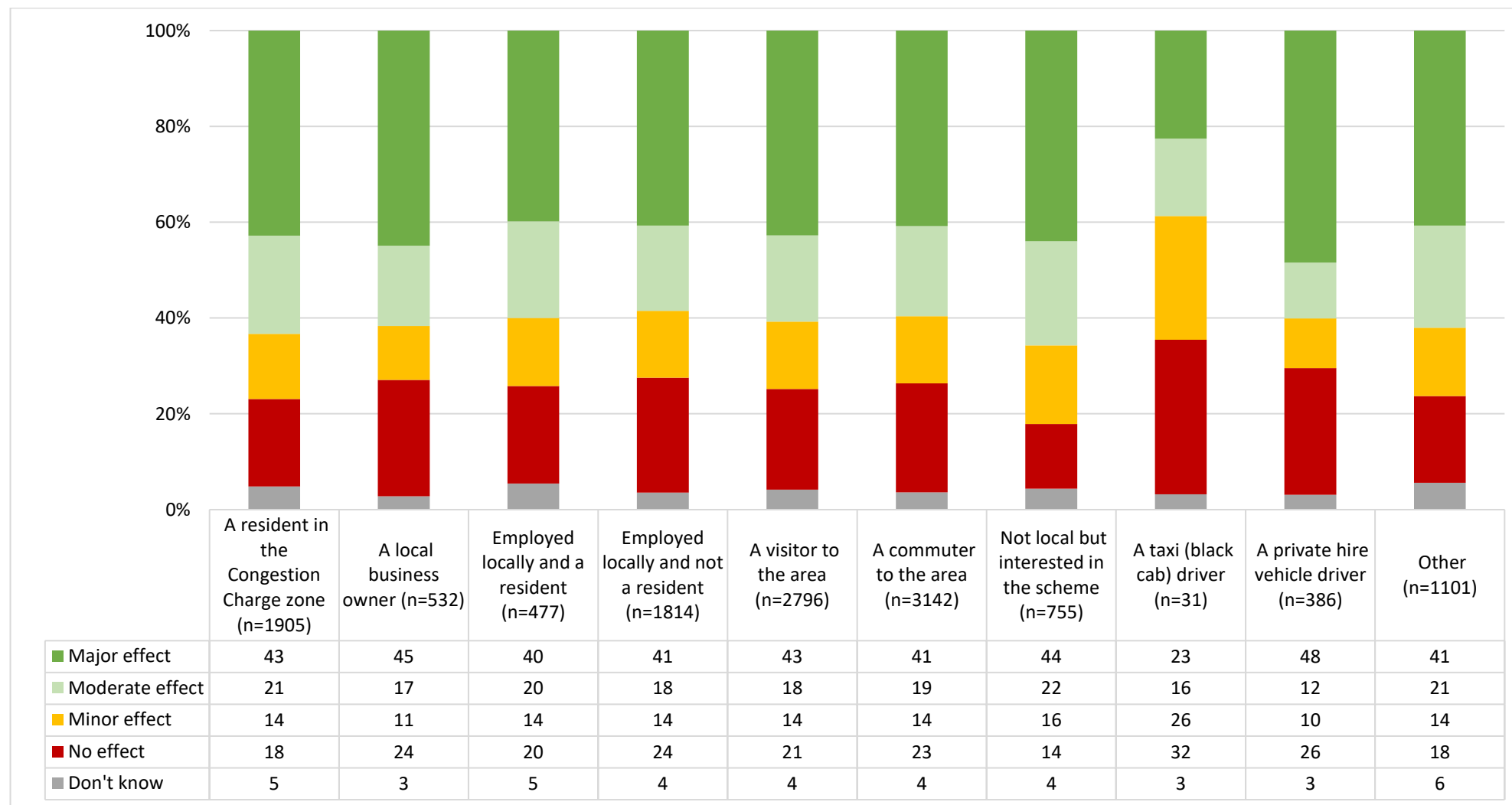
4.7. Effectiveness of operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday)

4.7.1. We asked respondents how effective they thought the operating hours of 07:00-18:00 on weekdays (Monday to Friday) would be in achieving aims. Results are shown in Table 9 and Figure 8.

Table 9: How effective would operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday) be in achieving our aims?

	All responses	Public	Stakeholder *
No effect	20%	20%	19%
Minor effect	14%	14%	23%
Moderate effect	20%	20%	21%
Major effect	42%	42%	37%
Don't know	4%	4%	0%
Total	8,551	8,508	43
Base: all respondents (1,080 public; 49 stakeholders; 1,129 total did not answer this question)			
*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.			

Figure 8: How effective would operating the Congestion Charge from 07:00-18:00 on weekdays (Monday to Friday) be in achieving our aims? (%)



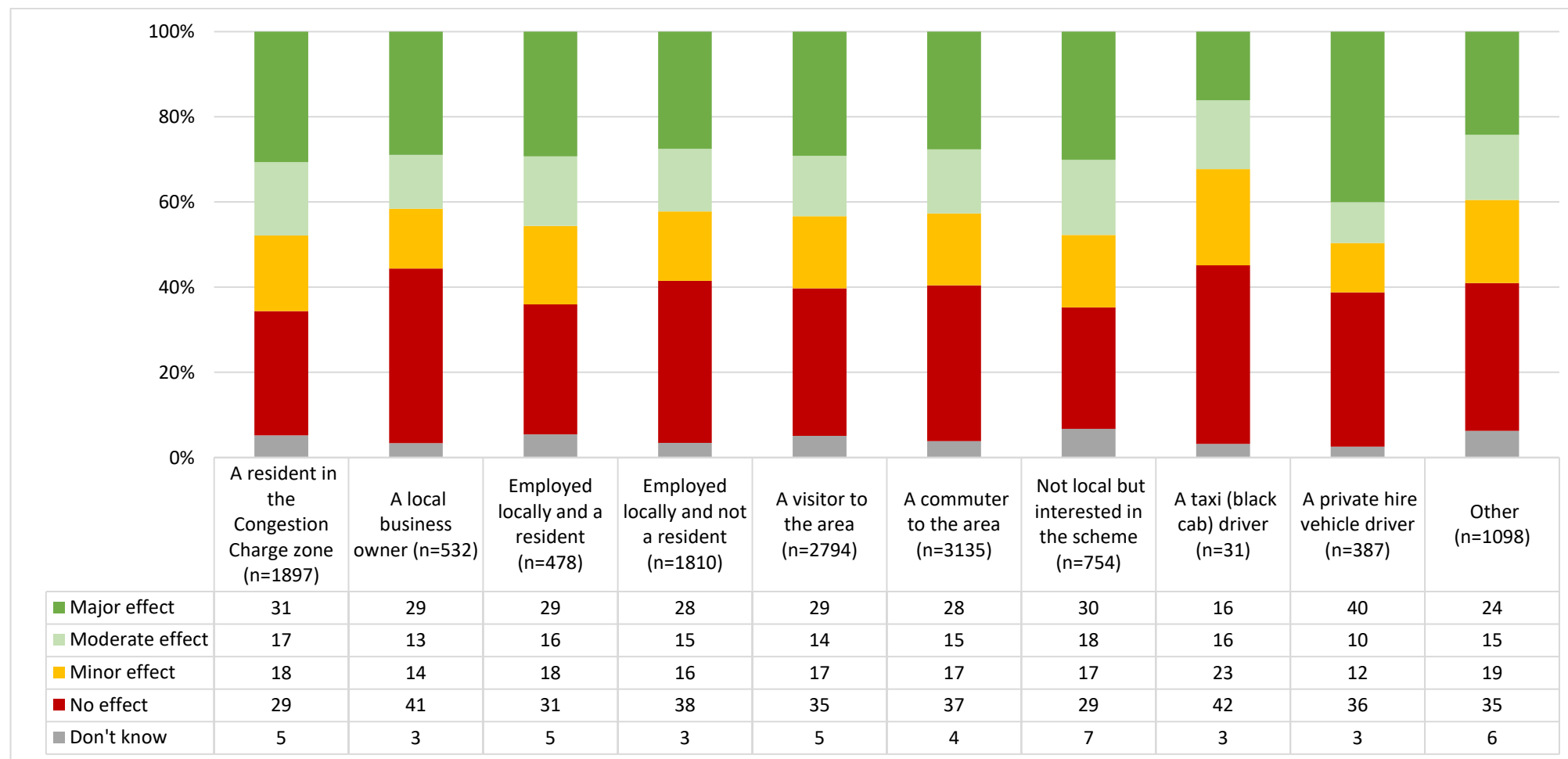
4.8. Effectiveness of operating the Congestion Charge on Saturday and Sunday and bank holidays between 12:00 and 18:00

4.8.1. We asked respondents how effective they thought the operating hours of 12:00-18:00 on Saturday and Sunday and bank holidays would be in achieving our aims. Results are shown in Table 10 and Figure 9.

Table 10: How effective would operating the Congestion Charge on Saturday and Sunday and bank holidays between 12:00 and 18:00 be in achieving our aims?

	All responses	Public	Stakeholder *
No effect	33%	33%	40%
Minor effect	17%	17%	19%
Moderate effect	16%	16%	14%
Major effect	29%	29%	26%
Don't know	5%	5%	0%
Total	8,526	8,484	42
Base: all respondents (1,104 public; 50 stakeholders; 1,154 total did not answer this question)			
*Only includes 42 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.			

Figure 9: How effective would operating the Congestion Charge on Saturday and Sunday and on bank holidays between 12:00 and 18:00 be in achieving our aims? (%)



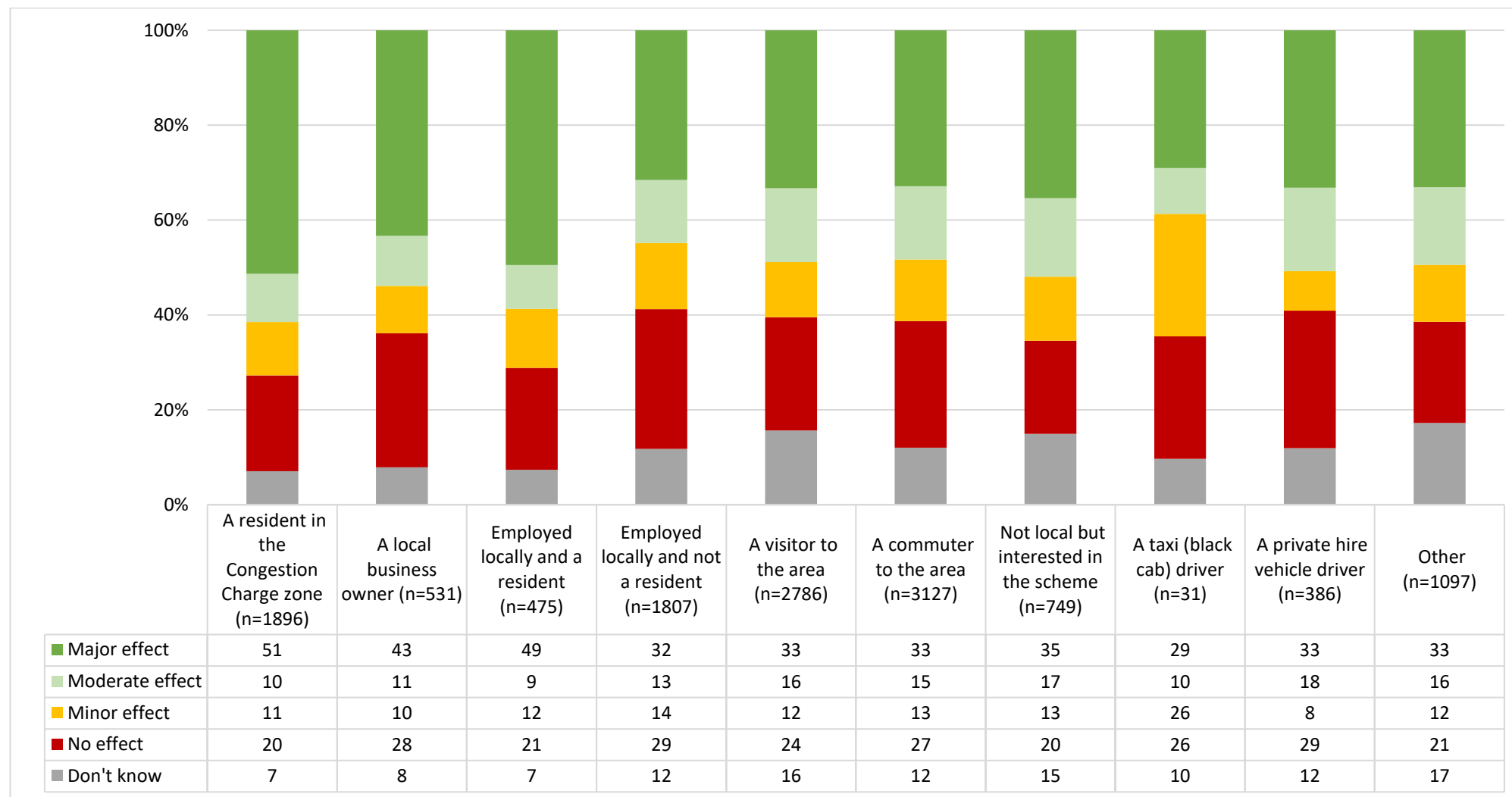
4.9. Effect of re-opening applications for the residents' discount of 90 per cent of the Congestion Charge

4.9.1. We asked respondents how effective they thought re-opening applications for the residents' discount of 90 per cent would be in achieving our aims. Results are shown in Table 11 and Figure 10.

Table 11: How effective would re-opening applications for the residents' discount of 90 per cent of the Congestion Charge be in achieving our aims?

	All responses	Public	Stakeholder *
No effect	23%	23%	37%
Minor effect	13%	12%	19%
Moderate effect	15%	15%	14%
Major effect	37%	37%	23%
Don't know	12%	12%	7%
Total	8,509	8,466	43%
Base: all respondents (1,122 public; 49 stakeholders; 1,171 total did not answer this question)			
*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.			

Figure 10: How effective would reopening applications for the residents' discount of 90 per cent of the Congestion Charge be in achieving our aims? (%)



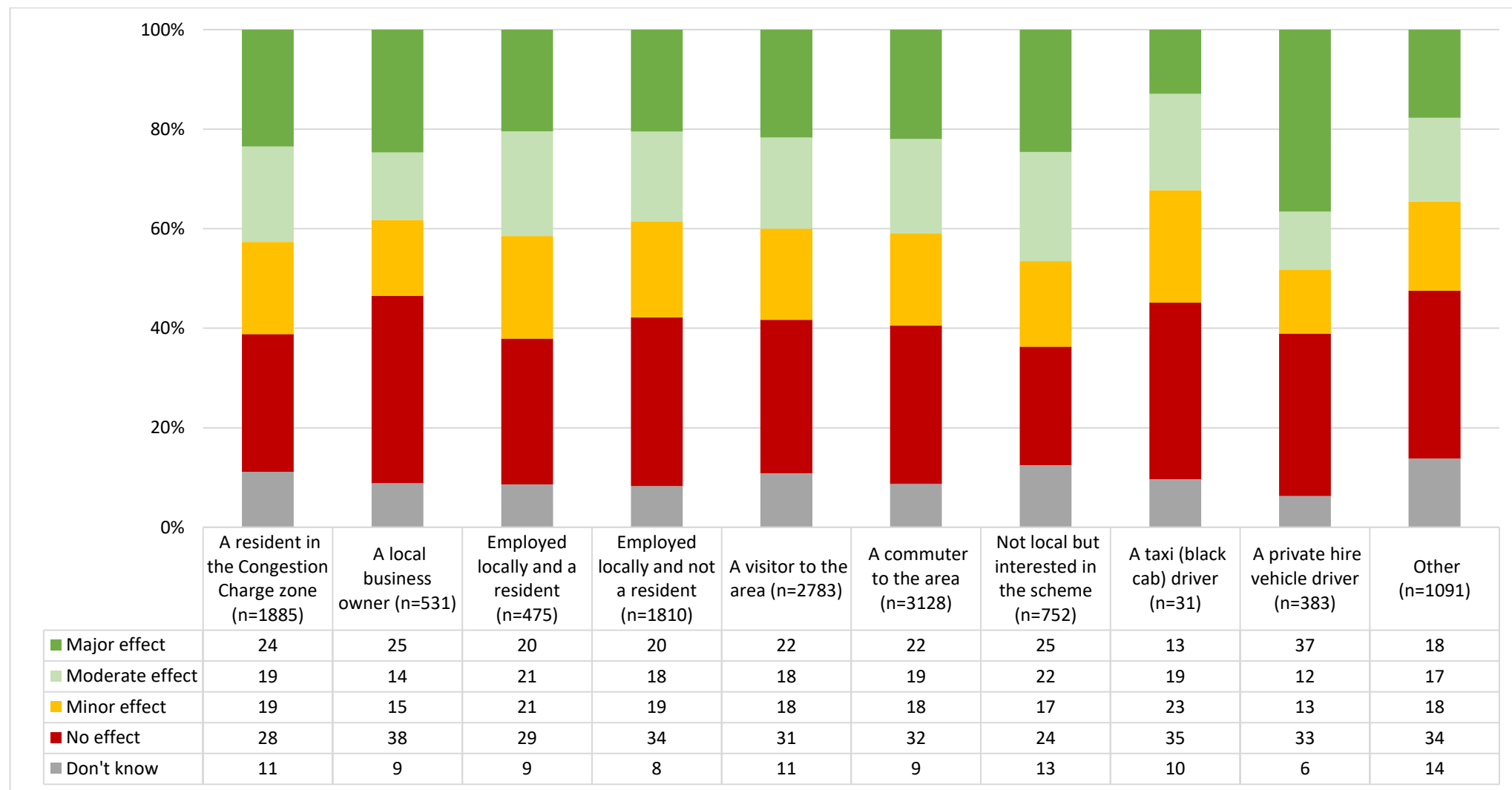
4.10. Effectiveness of increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days

4.10.1. We asked respondents how effective they thought increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days would be in achieving our aims. Results are shown in Table 12 and Figure 11.

Table 12: How effective would increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days be in achieving our aims?

	All responses	Public	Stakeholder *
No effect	30%	30%	36%
Minor effect	18%	18%	31%
Moderate effect	19%	19%	19%
Major effect	23%	23%	14%
Don't know	10%	10%	0%
Total	8,495	8,453	42
Base: all respondents (1,135 public; 50 stakeholders; 1,185 total did not answer this question)			
*Only includes 42 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.			

Figure 11: How effective would increasing the “pay next day” charge to £17.50 and extending the deadline for making payment to three days in achieving be our aims? (%)



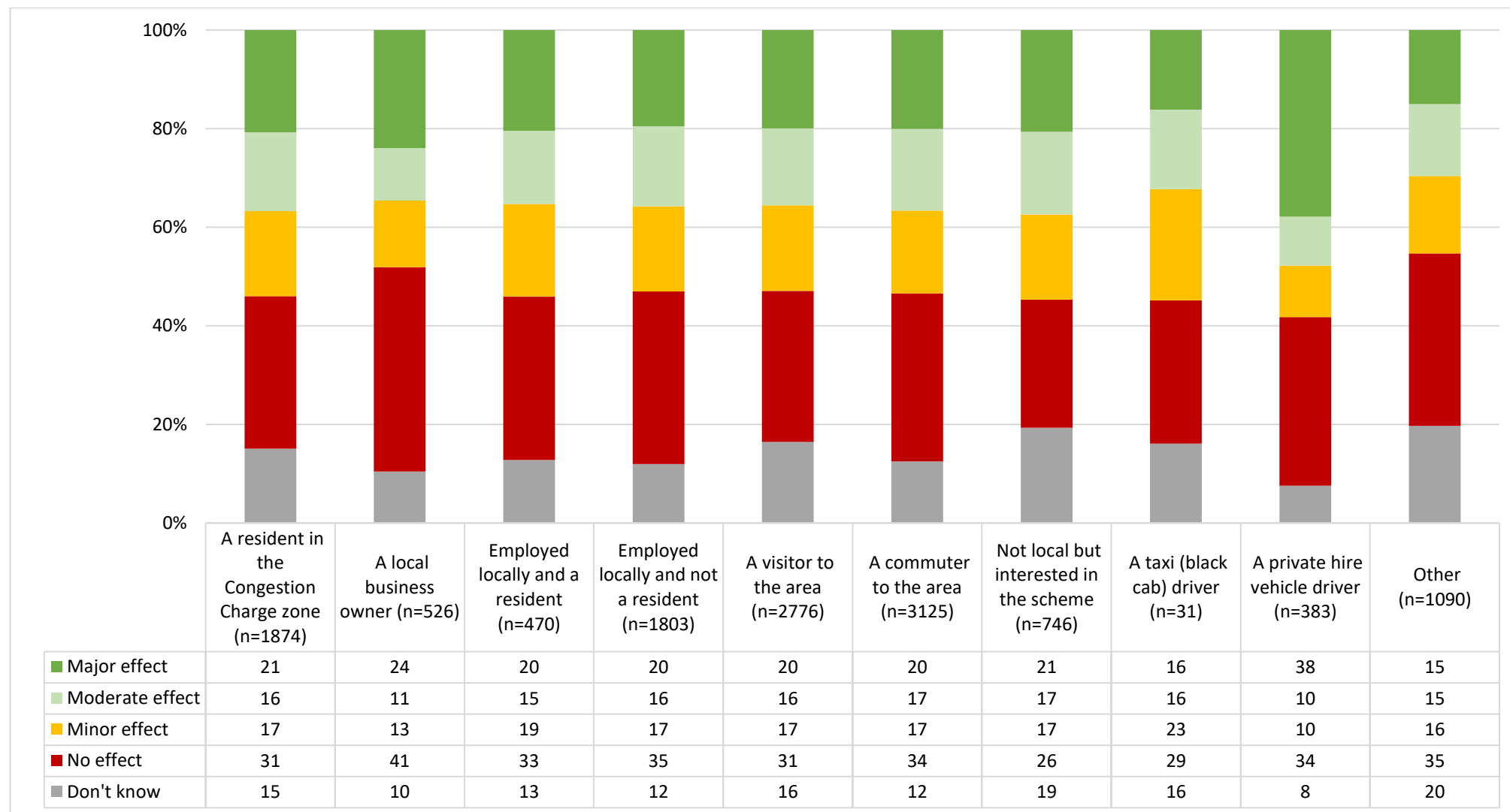
4.11. Effectiveness of no discount for payments made by Auto Pay or Fleet Auto Pay

4.11.1. We asked respondents how effective they thought removing the discount for payments made by Auto Pay or Fleet Auto Pay would be in achieving our aims. Results are shown in Table 13 and Figure 12.

Table 13: How effective would having no discount for payments made by Auto Pay or Fleet Auto Pay be in achieving our aims?

	All responses	Public	Stakeholder *
No effect	33%	32%	40%
Minor effect	17%	16%	33%
Moderate effect	16%	16%	14%
Major effect	20%	20%	14%
Don't know	15%	15%	0%
Total	8,466	8,426	43
Base: all respondents (1,162 public; 49 stakeholders; 1,214 total did not answer this question)			
*Only includes 43 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.			

Figure 12: How effective would having no discount for payments made by Auto Pay or Fleet Auto Pay be in achieving our aims? (%)



4.12. Importance of reimbursement arrangements

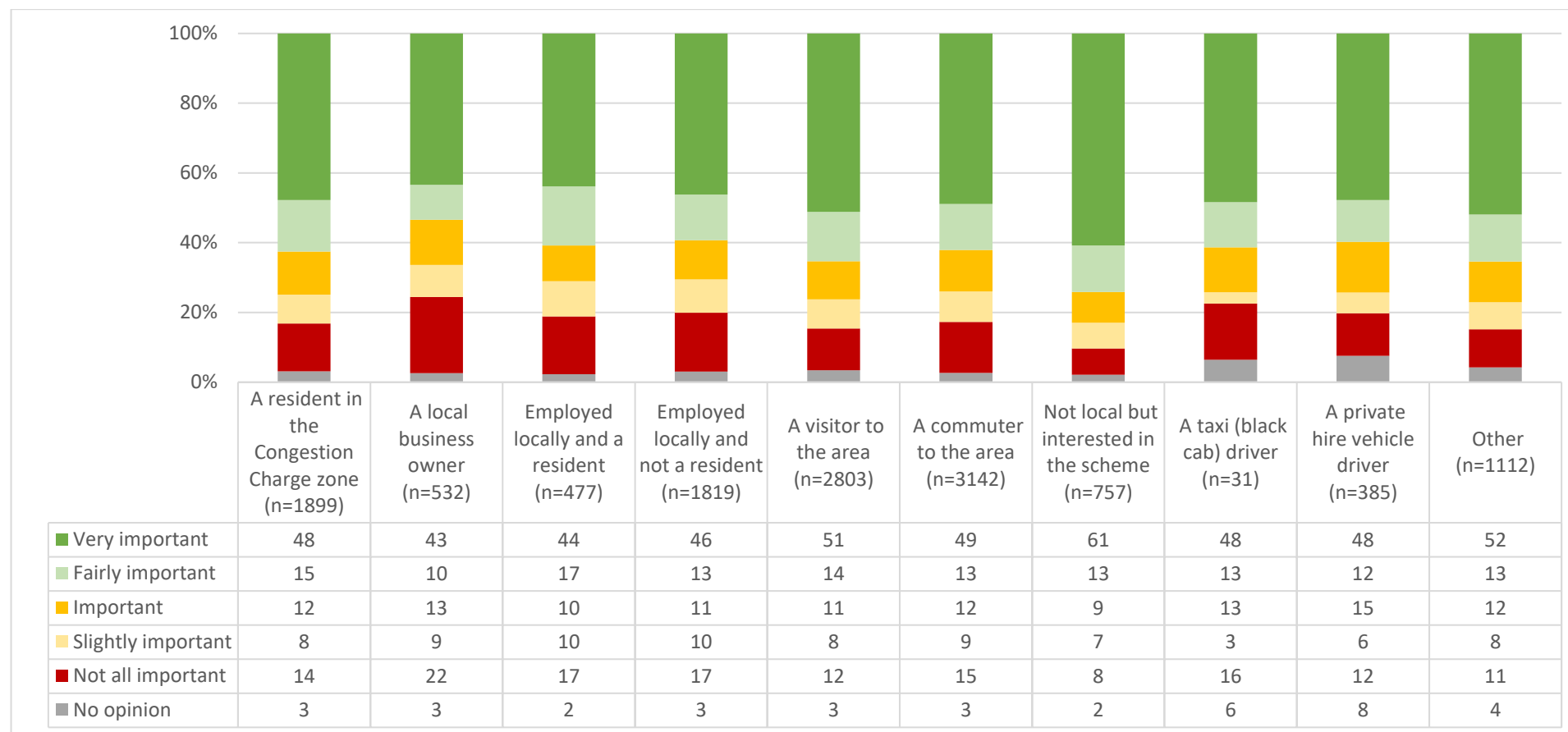
4.12.1. We asked respondents how important it was to have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London. Results are shown in Table 14 and Figure 13.

Table 14: How important would it be to you that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London?

	All responses	Public	Stakeholder *
Very important	50%	50%	45%
Fairly important	14%	14%	11%
Important	12%	12%	23%
Slightly important	8%	8%	0%
Not at all important	13%	13%	9%
No opinion	3%	3%	11%
Total	8567	8,523	44

Base: all respondents (1,065 public; 48 stakeholders; 1,113 total did not answer this question)
*Only includes 44 stakeholders who answered online questionnaire (most responded by email) therefore the percentages here should be treated with caution.

Figure 13: How important would it be to you that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics or epidemics in Greater London (%)



4.13. Quality of the consultation

4.13.1. We asked respondents how they rated the quality of the consultation. Results are shown in Table 15. We also asked an open question for any comments respondents may have about the consultation. These comments were analysed by AECOM and are presented in section 5.7.

Table 1515: What do you think about the quality of the consultation?

Consultation area	Very good	Good	Adequate	Poor	Very poor	N/A
Website structure and ease of finding what you needed	11%	25%	36%	11%	13%	5%
Written information	9%	25%	35%	12%	12%	7%
Maps, images and related diagrams	6%	19%	28%	9%	9%	29%
Online survey format	9%	24%	33%	15%	17%	3%
Website accessibility	11%	31%	35%	7%	8%	9%
Promotional activity	5%	15%	29%	10%	12%	30%
Base: Website 8,469; written info 8,370; maps 8,297; online survey 8,403; website accessibility 8,351; promotional material 8,227						

5. Responses to issues raised

5.1. Introduction

- 5.1.1. Each issue raised by respondents to the consultation has been identified and considered. This chapter describes these issues and outlines our response.
- 5.1.2. In addition to this chapter, the consultation responses themselves will be made available to the Mayor.
- 5.1.3. The first of the open questions gave respondents the opportunity to provide any comments about the proposals. The second open question asked respondents to provide any positive or negative impacts they had identified and to provide any suggestions to mitigate the negative impacts and/or enhance the positive impacts. AECOM (the independent consultant analysing the data) found there was considerable overlap between the two questions, for example with many of the issues which were relevant to the second open question being included in respondents answer to the first open question. It was agreed therefore to analyse the two questions together and a code frame was developed which covered both.
- 5.1.4. The following sections set out the issues raised by stakeholders, drawn out separately, and the issues raised by all respondents to the consultation alongside our responses to each issue. Where there is overlap between issues, these are either grouped together, where they were raised a similar number of times, or reference is given to relevant responses elsewhere in the table. To help the reader, the remainder of this chapter is structured under a number of themes (see Table 16).

Table 16: Structure of Chapter 5

Section		Page
5.2	General comments	59 59
5.3	Comments on specific impacts including <ul style="list-style-type: none">• Social impacts• Financial impacts• Impact on active travel and public transport• Wider impacts including environmental impacts	69 69 69 81 81 91 94 94
5.4	Comments on specific proposals <ul style="list-style-type: none">• Charge level• Charging days and hours• Residents' discount and online app payment• Pay next day	98 98 98 98 105 105 113 113 117 117

	<ul style="list-style-type: none"> • Auto Pay and Fleet Auto Pay • Reimbursements 	120120 123123
5.5	Comments on alternatives and mitigations	128128
5.6	Other comments related to the Congestion Charge <ul style="list-style-type: none"> • Discounts and exemptions • The CCZ • Implementation timescales 	136 136 148 151
5.7	Comments on the quality and process of the consultation	152152
5.8	Issues which were not related directly or indirectly to the proposals	157157

- 5.1.5. Responses from faith organisations and from small businesses or related organisations have been grouped. For each group we received numerous individual (and sometimes collective) responses and in order to make the report more readable, we have referred to these as the ‘faith groups’ and ‘small businesses’: this is not to imply that all respondents made the same point, but simply for clarity and brevity. Summaries of responses from each individual organisation are available to read in Appendix G. Individual consultation responses have been made available to the Mayor for his consideration.
- 5.1.6. For the faith group this comprises written responses from: 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 Trust; 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 Chapel* (and the Gate Pregnancy Centre which is based at the chapel). It also includes comments made at a meeting with TfL on 14 October 2021, 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).
- 5.1.7. For small businesses, this includes written responses from: Api: Cultural; Atkins Electrical; Change Group; Grovers of Borough Market; High Security Alarms; Jubilee Market Hall; Little Big Leaders; LTC Central Ltd; LW Theatres; Piper Transport; Public Eye; Ristretto Events; Sibilla Food Importers; Sterling Lights; United Fitness Brand.

5.2. General comments

- 5.2.1. Several overarching and general comments were made by respondents on their views of the impacts and appropriateness of the proposed changes. Table 17 outlines the general issues or comments that were made.

Stakeholders

- 5.2.2. In relation to this theme, there was broad support for the proposals from a number of boroughs in the CCZ, albeit with caveats. Westminster City Council supported the proposals with the exception of weekend and Bank Holiday charging. London Borough (LB) Hackney was supportive of the proposals, although said it would prefer charging hours to run to 19:00. LB Camden supported the proposals but called for a continuation of the longer weekday and weekend charging hours. LB Islington supported the proposals.
- 5.2.3. The City of London supports the proposed weekday charging hours and proposal on residents' discount but raises concerns over weekend and Bank Holiday charging. It also advocates a wider holistic approach to road user charging in London.
- 5.2.4. London TravelWatch, the statutory body representing London's transport users, was broadly supportive and noted the adverse impact of congestion on bus journey times and users. The London Chamber of Commerce and Industry (LCCI) was also supportive of the proposals, while at the same time noting that it would impose further costs on businesses and calling for a more streamlined approach to the various road user charging schemes in London. The RAC opposed the proposals noting that there is little scope to reduce traffic as current users are likely to have few alternatives. The Campaign for Better Transport stated its support for the proposals.
- 5.2.5. Keith Prince AM, on behalf of the GLA Conservative Group, opposed most of the changes, with the exception of the re-opening of the residents' discount.
- 5.2.6. The London Cycling Campaign (LCC) noted that some of the proposals would undermine the aims of the MTS by potentially reducing the uptake in cycling observed during the temporary changes.
- 5.2.7. LB Tower Hamlets stated that it would like more data on the traffic impacts of the temporary changes. GMB union said that traffic had reduced considerably during the pandemic and had not yet recovered. Heart of London Business Alliance (HOLBA) opposed the proposals stating that it understood the need to raise revenue but the priority should be to support the recovery by enabling workers and visitors to travel to central London, and that many of their businesses believe that the Congestion Charge unfairly affects the West End. It stated that central London and the West End had been disproportionately affected economically by the pandemic with a fall in foreign visitors and the need to support coach travel to venues. It said the CC scheme dispersed traffic elsewhere.

- 5.2.8. New West End Company (NWECC) stated that it supported measures to reduce traffic and improve air quality (including CC scheme and ULEZ) but the current focus should be on supporting the recovery of the economy. Royal Mail Group said it would be helpful for changes to be communicated well in advance and that it had no choice but to use vehicles in the zone.
- 5.2.9. Some smaller businesses also outlined a similar response to NWECC, and while some expressed support around the aims of the MTS, there was a view that now is not the right time to implement the changes and the focus should be on supporting the short-term recovery, such as waiting until central London is revitalised. This includes issues such as businesses already struggling due to the pandemic, as well as highlighting that people, be this visitors, customers or employees, are currently reluctant to use public transport and so travel into the centre of London by car is essential for access. Other issues and comments included the impact on businesses or employees who have no choice to drive and wouldn't be able to undertake their business otherwise; the view that the charge is just another tax or money making exercise for TfL; and comments on the cumulative impact from costs from parking and ULEZ expansion.
- 5.2.10. The London Electric Vehicle Company indicated that it is important for TfL to take steps to increase the number of people using public transport, and that they consider wheelchair accessible licensed hackney carriages to be part of this network and it being important for their exemption to remain. They highlighted that they do not believe the charge to be effective if the Cleaner Vehicle Discount is ended for hybrid vehicles.
- 5.2.11. KIPPA BID (Business Improvement District) highlighted the major impact the proposed changes will have on the over 100 companies that they represent.
- 5.2.12. The Road Haulage Association (RHA) stated its opposition to the changes. The London Private Hire Car Association (LPHCA) stated its opposition to having the Congestion Charge apply to PHVs, stating that PHVs are part of the solution to congestion and noting that the pandemic has already done economic damage to them.
- 5.2.13. Clapham Public Transport Users Group commented that TfL is not meeting its congestion reduction objectives because of Streetspace policies, and that this has worsened bus services and caused greater congestion.
- 5.2.14. Harlesden Neighbourhood Forum outlined their opposition to the proposals as car traffic in London needs to be reduced, and any change that will increase traffic shouldn't be taken.
- 5.2.15. Harrow Council for Justice said the CC scheme has not worked and should be scrapped. It said that it has not improved traffic and impacts the poor most of all.

Table 17: Responses to general comments raised

	Issue/comment	Times raised	Our response
A	Congestion Charge is just another tax/money-making scheme	1,070	<p>The objective of the CC scheme is to manage traffic and congestion in London. Without the scheme, congestion and other adverse impacts of traffic, such as air pollution and increased carbon emissions, would be worse. The scheme is kept under review and from time to time it is appropriate to make changes to some or all elements of the CC scheme in order to maintain its effectiveness in achieving this objective. Potential financial impacts are not taken into account in developing any proposed changes to the CC scheme.</p> <p>All revenue from the Congestion Charge must be used to further the aims of the MTS, which includes improving public transport and making enhancements for people walking and cycling.</p>
B	Other traffic measures cause congestion not volume of traffic	569	<p>The overarching objective of the MTS is that 80 per cent of all journeys in London should be made by walking, cycling or using public transport by 2041. To deliver this, investment has been made to improve the environment and reduce road danger for people walking, cycling and using public transport throughout London. This has included changes to the road network within central London.</p>
C	Unfair to penalise drivers (general comments)	379	<p>Central London has a tightly constrained road network. A shift from car use to more space efficient modes of travel is the only long-term solution to ensuring London is an efficient well-functioning city where people and goods can reliably get to their destinations. The high demand for the movement of motorised traffic in the limited geographic space of the CCZ (one per cent of London's geographic area) results in the extent of congestion that is seen.</p> <p>We therefore need to reduce car dependency in favour of increased trips by people walking, cycling and using public transport. To achieve this we need appropriate and safe networks that provide high quality routes and priority to make them more attractive, realistic and reliable choices for people.</p>

	Issue/comment	Times raised	Our response
			<p>The CC scheme requires that people who drive in the zone during charging hours pay to do so; the charge acts as a deterrent to using a vehicle instead of more sustainable modes and also helps to raise awareness of the costs associated with driving. Public transport users are faced with direct costs every time they take a bus or train, in the form of fares, and while drivers must pay for fuel (which is taxed), Vehicle Excise Duty (VED) and insurance, the cost of a specific journey is not so apparent as journeys taken by public transport.</p> <p>People and businesses who have no choice and have to drive in the CCZ, e.g. for delivery and servicing trips, benefit from the reduced traffic which results from the charge. The CC scheme enables more reliable journeys for these essential trips, with less delay and the additional costs associated with this.</p>
D	Oppose proposed changes because of Covid-19 (e.g. feel safer driving, already financially struggling)	361	<p>It is recognised that the COVID-19 pandemic has resulted in particular challenges in central London which are likely to continue beyond the pandemic. The proposals consulted on have been developed to meet the long-term aims of the MTS while also addressing the short-term challenges arising from the pandemic.</p> <p>These short-term challenges include preventing a car-led recovery from the pandemic. While public transport usage has now increased compared to the levels seen throughout the pandemic in 2020, Tube usage is still only reaching between 57 to 76 per cent of pre-pandemic levels, while bus services in London are between approximately 72 to 83 per cent.¹⁰ It is therefore considered timely to address the longer-term issues of traffic and congestion that were identified prior to the pandemic and which are forecast to continue in the coming years. As described in Chapter 1, in both forecasts traffic levels, including car, could increase in central London from today and from pre-pandemic levels.</p> <p>Traffic and congestion pose difficulties for London's economy as well as making it less attractive for people to walk and cycle, and by delaying bus journey times make public transport a less attractive option. In the IIA it was estimated that nearly 37,500 hours of travel time will be saved</p>

¹⁰ Based on DfT data, sourced 15 Nov 2021, available at: <https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic>

	Issue/comment	Times raised	Our response
			<p>per week due to the proposed changes to the CC scheme. This is worth over £550,000 a week (2021 prices and values), or approximately £29m per year. A study¹¹ on the economic future of the CAZ identified that COVID-19 may encourage a shift to walking and cycling which is further supported by the proposed changes to the CC scheme.</p> <p>We have put in place extensive measures to reassure Londoners and visitors about the safety of public transport,¹² such as the wearing of face coverings and enhanced cleaning on our network. Imperial College has undertaken testing on the transport network for all virus variants since September 2020, and no traces have been found.¹³</p>
E	Oppose/ disagree with the Congestion Charge scheme	299	<p>The CC scheme has been in place since February 2003 and has been effective in managing traffic and congestion in central London. There was a 30 per cent reduction in congestion within the CCZ, and a 15 per cent reduction in circulating traffic. In addition, by reducing the overall volumes of traffic within the CCZ and increasing the efficiency of circulating traffic, the CC scheme was also responsible for a reduction in emissions. This equated to approximately a 12 per cent emissions reduction of both NO_x and PM₁₀ from road traffic and 20 per cent reduction in emission of CO₂ from road traffic, based on a 24-hour annual average day.</p> <p>The CC scheme was introduced following extensive public and stakeholder consultation and has been modified over the years – again following public and stakeholder consultation unless exceptional circumstances exist – in order to ensure it remains effective.</p>
F	Oppose/ disagree with the proposed changes (general comment)	295	<p>We have noted these comments and addressed specific issues and/or comments under the appropriate themes elsewhere within Chapter 5.</p>

¹¹ https://www.london.gov.uk/sites/default/files/caz_economic_future_emerging_findings_update15022021.pdf

¹² See for example: <https://tfl.gov.uk/campaign/safer-travel-guidance>

¹³ <https://content.tfl.gov.uk/imperial-college-covid-sampling-at-tfl-phase-2-june-2021.pdf>

	Issue/comment	Times raised	Our response
G	Public transport isn't a viable option to replace car journeys, incl. impact on shift work	278	<p>The CC scheme has been in place since 2003 and over that period there has been a significant decrease in private transport and increase in public transport. Private transport mode share has decreased by 11.8 percentage points between 2000 and 2019 (in terms of journey stages); public transport mode share increased by 10.7 percentage points in terms of journey stages,¹⁴ showing its potential as a viable alternative. This took place in the context of an increasing population: between 2000 and 2019 London's population increased by 24 per cent.</p> <p>The CCZ has the highest levels of public transport accessibility in London, and is one of the best connected places in the world. This is reflected in the already high public transport mode share in central London. Prior to the pandemic, a 90 per cent sustainable mode share for trips made by London residents within central London had been achieved, with almost all remaining car trips potentially switchable to sustainable modes.</p> <p>Service levels on public transport are now near normal,¹⁵ including the planned operation of some parts of the Night Tube following its return in November 2021¹⁶ and increased levels on the National Rail following the reduction through the pandemic. This now provides a more standard and reliable level of public transport provision for users throughout the day across the week. Certain services (within and beyond London) are less frequent at the weekend. In developing the proposals, we took into account the changing and uncertain nature of weekday travel patterns, the impact on the evening economy in central London and on those who need to carry large or heavy loads to participate in it, or drive in for shift work. For this reason, for example, it is proposed to end weekday and weekend charging hours at 18:00, and charge only from 12:00-18:00 at the weekends.</p>

¹⁴ Travel in London 12, TfL, 2019

¹⁵ Based on services levels operating on 15 November 2021 - <https://tfl.gov.uk/campaign/safer-travel-guidance?intcmp=63123>

¹⁶ Night Tube resumed on the busiest Central and Victoria lines on 27 November 2021. Despite RMT strike action, TfL was able to deliver a service throughout the night. A full overnight service ran on the Victoria line, with a train every 10 minutes, and a consistent service on the Central line.

	Issue/comment	Times raised	Our response
			We have put in place extensive measures to reassure Londoners and visitors about the safety of public transport, ¹⁷ such as the compulsory wearing of face coverings and enhanced cleaning on our network. Imperial College has undertaken testing on the transport network for all virus variants since September 2020, and no traces have been found. ¹⁸
H	Proposals will not meet TfL's aims	223	<p>As described in the consultation materials, the changes are proposed in order to ensure that the CC scheme remains an effective tool in managing traffic and congestion in London. It thereby helps to achieve the other objectives of the MTS such as an increased sustainable mode share, improved air quality and a reduction in private vehicle use. For trips within central London, it sets a target of 95 per cent sustainable mode share by 2041, for trips to and from central London this target rises to 99 per cent and it also aims for a 10 per cent reduction in freight traffic in the morning peak by 2026.</p> <p>In developing the proposals, we undertook modelling of the expected impacts (described in detail in the Supplementary Information), and this demonstrates that the changes are likely to help to achieve our aims with regard to traffic reduction, while also bringing other benefits to London.</p> <p>A £15 charge level is expected to reduce car kms in the CCZ by around four per cent between 07:00-18:00 on weekdays, compared to a situation where no changes were made to the pre-pandemic scheme. This is a significant reduction in an area where road space is heavily constrained and demand is high. The reduction in car usage is expected to result in an increase in sustainable travel to, within and from the CCZ with around 6,000 new trips made by public transport and 2,000 new walking and cycling trips made each weekday and 8,000 new trips by public transport and 3,000 new walking and cycling trips on each day of the weekend.</p> <p>The IIA undertaken for the proposals also identified positive impacts in terms of air quality as a reduction of vehicle emissions, and subsequent positive impacts on human health.</p>

¹⁷ See for example: <https://tfl.gov.uk/campaign/safer-travel-guidance>

¹⁸ <https://content.tfl.gov.uk/imperial-college-covid-sampling-at-tfl-phase-2-june-2021.pdf>

	Issue/comment	Times raised	Our response
I	Support/agree with the proposed changes (general comment)	194	We have noted these comments.
J	Support/agree with the CC scheme (general comment)	58	We have noted these comments.
K	Support proposed changes because of COVID-19	10	We have noted these comments.
L	Walking/cycling/active travel is not a viable option for some	9	The CC scheme has been in place since 2003 and over that period there has been a significant decrease in private transport and increase in the proportion of people walking and cycling. Where walking and cycling is not a realistic travel choice, the CCZ has the highest levels of public transport accessibility in London and is one of the best-connected places in the world. Please see row G for further information on public transport. Blue Badge holders are also able to nominate up to two vehicles per day to receive a 100 per cent discount for trips they need to make by car into the zone, and taxis and designated wheelchair accessible PHVs continue to be exempt from the charge.
The following issues were raised by stakeholders in addition to the coded responses above.			
	PHVs part of the solution to congestion		As set out in the Supplementary Information, the growth in PHVs in recent years has been a significant contributor to congestion, with the MTS noting that it was estimated there would be around 4,000 PHV daily entries in the CCZ in 2003, which had risen to around 18,000 per day by 2017. In 2019, following public and stakeholder consultation, the PHV exemption was removed for all but designated wheelchair accessible PHVs (in addition, some PHVs may qualify for the Cleaner Vehicle Discount, CVD).

	Issue/comment	Times raised	Our response
			PHVs remain an option for those who do not wish to drive into the zone and wheelchair accessible PHVs continue to be exempt from the charge. They may also benefit from the Blue Badge Discount if nominated by a Blue Badge holder for an eligible trip. However, in order to meet the objectives of the MTS it is important for people to travel by sustainable and space-efficient modes wherever possible: walking, cycling and public transport.
	Proposed changes will undermine the objectives of the MTS		Please see response in row H.
	CC scheme disperses traffic elsewhere		Monitoring of the impacts of the CC scheme has not shown this to be the case: traffic congestion did not increase on the inner ring road or key radial routes as a consequence of the CC scheme. ¹⁹ Incentivising more people to walk, cycle or use public transport for trips has wider benefits for areas and the times outside of the CC scheme. We will continue to monitor traffic levels and pollution in London.
	Cumulative impacts from charges on drivers		<p>The IIA took account of the cumulative effects of the LEZ and ULEZ, including its expansion on 25 October 2021. The IIA concluded that there were unlikely to be any cumulative effects associated with the interaction of these schemes due to:</p> <ul style="list-style-type: none"> • Since April 2019, people using vehicles that do not meet the ULEZ emissions standards already pay the ULEZ charge within the CCZ and therefore the expansion of ULEZ has no impact on vehicles that already travel into within or from the CCZ. • The LEZ similarly formed part of the baseline assessment as all of the most polluting lorries, buses and coaches travelling in the CCZ are already liable for this charge. Coaches and buses are both exempt from the Congestion Charge, with only the small minority of heavy goods vehicles (HGVs) that do not comply with the LEZ emissions standards being subject to both the LEZ and Congestion Charge. Due to the time restrictions placed on HGV entries into the CCZ by the London Lorry Control Scheme,

¹⁹ <https://content.tfl.gov.uk/central-london-congestion-charging-impacts-monitoring-sixth-annual-report.pdf>

	Issue/comment	Times raised	Our response
			<p>under the proposed changes there would only be one additional hour per week (12:00-13:00 on a Saturday) when vehicles required to pay the LEZ would also incur the Congestion Charge. It is considered that most HGV operators would be able to adjust their schedule to avoid travelling through the CCZ at this time.</p> <p>On-street parking (excluding the Transport for London Road Network (TLRN)²⁰) is managed by London Boroughs, while off-street parking facilities are responsible for their own sites. Due to the high demand for parking in central London, it is charged at a price that reflects the balance between its supply and demand and the need to use it to manage traffic, and ensure provision for resident parking and loading bays where appropriate. Parking charges can reflect time of day, day of the week and emissions, allowing people to park at less busy times of the day / week in less polluting vehicles at a lower price.</p>

²⁰ The TLRN, also known as 'red routes', is the strategic road network managed by TfL.

5.3. Comments on specific impacts

- 5.3.1. Issues raised by respondents fell under the following themes: social impacts; financial impacts; impacts on active travel and public transport; and wider impacts including environmental impacts. Each of these themes is addressed in turn below in Table 18.

Social impacts

Stakeholders

- 5.3.2. Keith Prince AM, on behalf of GLA Conservatives, said that weekend charging was unlikely to meet Equalities and DDA obligations and moral obligations to faith groups.
- 5.3.3. London Chinatown Chinese Association stated that it is common for many Chinese families to visit Chinatown on a Sunday for a range of cultural and social activities including children's language learning, food shopping and for different generations to eat together. It stated that venues outside central London were often not open on a Sunday, or those on the outskirts closed until the evening, and that meeting in central London was important and meaningful for Chinese families in the UK on a Sunday, and it is impractical for extended families to travel by public transport.
- 5.3.4. The Army Cadet Force said that unless the charge level returned to £10 and charging hours ended at 18:00 it would reduce the number of volunteers willing to travel into London for its activities.
- 5.3.5. Faith organisations were opposed to weekend charges and stated that there was a lack of viable alternatives to driving for some of the people attending, working or volunteering at their venue. Comments included that public transport is more challenging for older or disabled people; that cars and minibuses are used to collect children (including disadvantaged young people); one respondent said that most of its congregation is Black and African and does not live in central London.
- 5.3.6. One respondent in this group disagreed with the findings of the IIA, stating that the impacts are not minor; other comments were that the IIA did not take into account the range of activities that churches provide which include both multiple services on a Sunday and auxiliary services such as lunch clubs or children's groups (meaning that it is harder to avoid the charging period).
- 5.3.7. Several respondents in this group stated that churches have yet to recover from the pandemic impacts in terms of the size of the congregation, and that for those who drive, a charge would be a further disincentive; some volunteers and members also bring heavy equipment which cannot be transported other than by vehicle (including materials for voluntary services associated with the group). It

was stated that while some currently reimburse for CC costs, if this is done long-term it will affect the amount of money available for other activities such as community and charity work. Respondents disagreed with the assumption made in the IIA that services could be re-timed to end in time for people to leave the CCZ before the start of charging hours at 12:00. This is especially difficult for churches which run several consecutive but different types of service which people would not switch between e.g. Emmanuel Chinese Church runs three consecutive services in different languages. Some asked that the proposed weekend hours be changed, including a later start time or charging on Saturday only. There was also a request for an exemption for churchgoers.

- 5.3.8. GMB Union said that there were impacts on low-paid groups including PHV drivers and food delivery drivers, stating that TfL could license the latter. LPHCA also outlined that they are currently unable to meet the demand for PHVs, and highlighted the role that PHVs play in providing transport for elderly, disabled or vulnerable people, for whom walking, cycling or using public transport may not be an option, and the potential implications of this.

Table 18: Detailed responses to Social Impacts

	Issue/comment	Times raised	Our response
A	Will negatively impact on social/leisure activities	603	<p>Central London is very well connected with high levels of connectivity by rail, underground and bus, alongside other options for travel including car clubs, taxis and PHVs and London's Dial-a-Ride service. Most people (around 90 per cent of trips) travel to central London by public transport, which indicates that it is a widely available and practicable choice in most cases. Within London, travel is free or discounted for young people, and older people and eligible disabled people can obtain a Freedom Pass meaning that travel is free all weekend and most of the week. You can use the pass anytime on weekends and bank holidays. Older people travelling from outside London may be eligible for an English National Concessionary Pass²¹. For people who are eligible for a Blue Badge and would otherwise not be able to travel by public transport into the CCZ, the 100 per cent discount to the Congestion Charge continues to be available and allows two vehicles to be nominated. Other discounts and exemptions are also available including the disabled tax class exemption and Cleaner Vehicle Discount.</p> <p>Car ownership is low among the lowest income groups in London and buses are an important, and relatively cost-effective alternative.</p> <p>Service levels on public transport are now near normal, including the planned operation of some parts of the Night Tube following its return in November 2021 and increased levels on the National Rail following the reduction through the pandemic. This now provides a more standard and reliable level of public transport provision for users throughout the day across the week. In developing the proposals, we took into account people who need to carry large or heavy loads to participate in social activities or drive in for shift work. For this reason, for example, it is proposed</p>

²¹ The English National Concessionary Pass can be used on London buses from 09:00, Monday to Friday. You can use the pass anytime on weekends and bank holidays.

	Issue/comment	Times raised	Our response
			<p>to end weekday and weekend charging hours at 18:00 and charge only from 12:00-18:00 at the weekends.</p> <p>The IIA identified positive impacts in terms of increased active travel in the zone as a consequence of reduced traffic and emissions. Discounts and exemptions are also available for those who need to drive, including the residents' discount, Blue Badge discount, CVD and for vehicles with nine or more seats.</p>
B	Will negatively impact on faith groups (e.g. travelling to church); impact on BAME congregation; discount for churchgoers	445	<p>The IIA assessed the impacts on people who share any of the protected characteristics, including religion and belief. 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 these non-charged hours are longer than during the week, offering more opportunity to do this. 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, for example people may be eligible for other discounts or exemptions, or could travel by other modes. For those that do still want or need to drive during charged hours it may be possible to share driving arrangements and to spread the cost of the charge.</p> <p>Central London is very well connected with high levels of connectivity by rail, underground and bus, alongside other options for travel including car clubs, taxis and PHVs and London's Dial-a-Ride service. Within London, travel is free or discounted for young people, and older people and eligible disabled people can obtain a Freedom Pass meaning that travel is free all weekend and most of the week. Older people travelling from outside London may be eligible for an English National Concessionary Pass. For people who are eligible for a Blue Badge and would otherwise not be able to travel by public transport into the CCZ, the 100 per cent discount to the congestion charge continues to be available and allows two vehicles to be nominated. Other discounts and exemptions are also available including the disabled tax class exemption and Cleaner Vehicle Discount. Further discounts include vehicles with nine or more seats, which religious and faith</p>

	Issue/comment	Times raised	Our response
			<p>organisations would be able to register and operate to aid transportation of their congregations and/or volunteers.</p> <p>Most people (around 90 per cent of trips) choose to travel to central London by public transport, which indicates that it is a widely available and practicable choice in most cases. Car ownership is low among the lowest income groups in London and buses are an important, and relatively cost-effective alternative.</p> <p>The cost and availability of parking is another factor in choosing whether or not to drive into the CCZ; although, for example, some free on-street parking is available in Westminster on Sundays, it is highly constrained and off-street charges are relatively high.</p> <p>It is not considered appropriate to develop a discount or exemption specifically for churchgoers, or people attending other types of religious service. As noted above, there are ways to mitigate the impacts identified in the IIA and by stakeholders during the consultation. It may be possible for people attending services, or places of worship to change the time of services / the services they attend and where this is not possible for religious or other community services, there are many other ways of accessing places of worship in the zone. To introduce a discount would undermine the objectives of the scheme. In addition, minibuses of 9 or more seats are exempt. Churches can operate shuttle services for churchgoers unable to use public transport or active transport.</p> <p>The proposed start time for weekend charging is informed by when traffic is at its highest. Pre-pandemic, car traffic (including PHVs) on both Saturdays and Sundays in the CCZ was higher than on an average weekday. Cars (including PHVs) made up a greater proportion of traffic in the CCZ on Saturdays and Sundays than an average weekday, accounting for 70 per cent of traffic over the weekend compared to 50 per cent in the week. There are similar levels of traffic activity on an average Saturday and Sunday: overall traffic is slightly lower on a Sunday but the share of car and PHV traffic is higher (74 per cent on a Sunday compared to 69 per cent on a Saturday), meaning that it is appropriate to apply the charge on both days. There are likely to be two main reasons for this. Firstly, weekends were previously uncharged and so there was less of a</p>

	Issue/comment	Times raised	Our response
			<p>deterrent to private car use, and secondly that the types of trips and activity taken at the weekend differ from weekday travel patterns for many people.</p> <p>It is not considered appropriate to move to a later start time for charging hours as was suggested by some respondents. The objective of the CC scheme is to manage traffic and congestion in central London and the proposed charging hours are intended to target the busiest times of day, whilst still providing a charge free window when traffic levels are lower. Observed traffic levels pre-pandemic were broadly similar on both Saturdays and Sundays (in fact overall entries were highest on a Sunday) which is why weekend charging is proposed for both days. We will continue to monitor the traffic in the zone after the Mayor takes a decision on whether or not to implement the proposals.</p> <p>We acknowledge that the proposed changes could present an additional cost for people driving to attend religious services in the CCZ during charging hours, and that churches in the CCZ serve specific communities and nationalities. The impacts on these groups have been assessed; however, on balance, considering potential mitigations and public transport alternatives a change to the proposal is not recommended.</p>
C	Will negatively impact elderly people	366	<p>The IIA identified a number of different impacts on older people including minor positive impacts as a result of improved air quality, increased health benefits from active travel, improved public transport reliability, less busy and noisy streets and reduced road danger. The impact on access to healthcare was identified as neutral. Minor negative impacts were identified by older people accessing home-based care.</p> <p>For older people living in the CCZ who are already registered for the 90 per cent residents' discount, it continues to be available. For older people who have more recently moved into the CCZ, it is proposed that the residents' discount is reopened for eligible residents.</p> <p>Older people may also rely on informal care and families and friends visiting. Currently only five per cent of all trips with a destination in central London are made by driving, with all other trips being made by other means that would not incur the congestion charge. This means there will only be a small proportion of such trips impacted by these proposals.</p>

	Issue/comment	Times raised	Our response
			<p>Other discounts and exemptions also remain available which could mitigate impacts for older people and their visitors, such as the 100 per cent discount for Blue Badge holders and for people who own a vehicle that meets the requirements of the Cleaner Vehicle Discount. Additionally, a retention and redefinition of reimbursement arrangements is included within the current proposals. Pre-pandemic, a reimbursement arrangement applied to patients travelling to an NHS appointment who were clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and have a compromised immune system; require regular therapy or assessment; or need regular surgical intervention. The reimbursement criteria was expanded as part of the temporary changes to the CC scheme that were introduced in response to the pandemic and patients who are at high or moderate risk from COVID-19 may also claim a reimbursement. We are now proposing to keep these expanded criteria but make it more general so that it would apply in the event of any pandemic or epidemic prevalent in Greater London (including COVID-19) to protect the most vulnerable to infection.</p> <p>For travel within London older people and eligible disabled people can obtain a Freedom Pass meaning that travel is free all weekend and most of the week.</p> <p>For those that do have to drive in the zone during charging hours, the impact on weekdays (where hours will revert to the same as those in place pre-pandemic), the impact will be from the higher charge level which increases the cost to a driver by £3.50 (or £4.50 if previously paid by Auto Pay). As outlined in Chapter 2, this is the longest period in which there has not been a permanent change to the level of the Congestion Charge, while, over the same period, the cost of using public transport has increased, as described earlier in the section. This has reduced the effectiveness of the Congestion Charge as a tool to manage traffic in central London.</p> <p>For those travelling at weekends, it will be possible to travel by motor vehicle in the CCZ on both Saturday and Sunday mornings, before charging hours commence, and after 18:00 when they finish.</p>

	Issue/comment	Times raised	Our response
D	Will negatively impact disabled people	195	<p>The IIA assessed the likely impacts of the proposals on groups with protected characteristics, including disabled people. This is summarised in section 2.5 and includes positive benefits owing to air quality improvement and potential negative impacts for disabled people who travel by car – including for healthcare - but do not qualify for any of the discounts or exemptions available. The IIA also noted that there could be some impacts on people who need to access certain types of health and care.</p> <p>Existing discounts and exemptions to the charge are proposed to remain unchanged, which may help to mitigate effects on eligible drivers. The 100 per cent Blue Badge discount (available for up to two registered vehicles, and which can include a personal owned vehicle and/or one that is travelled in and owned/used by someone else) and an exemption for vehicles with the disabled tax class continue to be available.</p> <p>Additionally, a retention and redefinition of reimbursement arrangements is included within the current proposals. Pre-pandemic, a reimbursement arrangement applied to patients travelling to an NHS appointment who were clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and have a compromised immune system; require regular therapy or assessment; or need regular surgical intervention. The reimbursement criteria was expanded as part of the temporary changes to the Congestion Charge that were introduced in response to the pandemic and patients who are at high or moderate risk from COVID-19 may also claim a reimbursement. We are now proposing to keep these expanded criteria but make it more general so that it would apply in the event of any pandemic or epidemic prevalent in Greater London (including COVID-19) to protect the most vulnerable to infection.</p>
E	Will negatively impact vulnerable people (not specified whether referring to disabled or elderly people)	184	
F	Proposed changes will have a negative impact on those	135	<p>Please see the responses under individual characteristics.</p> <p>We recognise that many people will be affected by inter-related issues that impact on different protected characteristics. Research²² undertaken by TfL highlights these issues. Some of the key groups which overlap are:</p>

²² Travel in London: Understanding our diverse communities (2019), available at <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

	Issue/comment	Times raised	Our response
	with protected characteristics		<ul style="list-style-type: none"> • People on low incomes are also more likely to be older people (24 per cent of those on low income are also 65+ and more likely to own a Freedom Pass) • Disabled people are more likely to be older (44 per cent of disabled people are also over 65 and are more likely to be on a low income (61 per cent of disabled people are also on low income) <p>Some relevant discounts and exemptions are in place for these groups as set out in rows C, D and E of this table.</p>
G	Will encourage people to drive at different times (e.g. evenings and weekends for shopping and leisure)	45	<p>The CC scheme is intended to manage traffic and congestion in central London. Charging hours are based on evidence of traffic in the zone as described in the Supplementary Information document. It is accepted that some people will choose to re-time their journeys, in order to avoid the charge.</p> <p>The CC scheme is kept under review to ensure it remains effective and for this reason the current proposals include weekend charging, whereas pre-pandemic there was no charge on Saturday and Sunday. This proposal is made in response to the changes to observed traffic in recent years, with weekend traffic being higher than on weekdays, with a greater proportion of cars. The hours in which this increased traffic is observed does, however, differ at the weekends. Although entries to the zone have been higher on Saturday and Sunday compared to an average weekday, overall traffic levels are lower on weekend mornings. Given the different types of journey and when journeys are made at weekends compared to weekdays, we are proposing shorter charging hours at the weekend. This is expected to help mitigate the impact on some individuals through not charging at quieter times of the day, while tackling traffic and congestion during the busiest part of the day. We will continue to keep the CC scheme under review in future to ensure that it remains effective.</p>
H	Proposed changes will have a positive impact on those with protected characteristics	11	We have noted these comments.

	Issue/comment	Times raised	Our response
The following issues were raised by stakeholders in addition to the coded responses above.			
	Impact on low-paid: PHV drivers and food delivery couriers		<p>The IIA identified a potential minor negative impact to some PHV drivers (those that work for PHV operators who are not able to change their fares in response to changes). The IIA identified a minor negative impact on people working at weekends and commuting by car in workers in lower-paid sectors such as retail, hospitality and leisure.</p> <p>Other evidence suggests that since the PHV exemption was removed in April 2019, operators have taken steps to reduce the impacts by, for example, re-organising their fleets so that fewer vehicles travel into the CCZ. Some PHVs will also be eligible for the CVD. Drivers and operators who own designated wheelchair accessible vehicles would also not be required to pay the charge and would remain exempt. Some passengers may also be entitled to the Blue Badge discount. Where a passenger qualifies for the Blue Badge discount, the option exists for them to nominate a particular PHV which they have used to travel into the CCZ with the vehicle then being subject to a 100 per cent discount from the Congestion Charge.</p> <p>With regards to food delivery drivers, while there is some crossover with the PHV trade, many operators use motorcycles or electric bikes which are not subject to the CC. TfL has no powers to license this trade.</p>
	Impact on low-income groups		<p>The assessment of the potential impacts on those on low incomes was set out in the IIA and is summarised in section 2.5. This included minor positive impacts arising from improved bus journey time reliability (buses are an important mode used by those on lowest incomes) and minor negative impact on people working in specific sectors including PHV drivers and those in the leisure, hospitality and retail sectors who are on lower incomes. There may also be a minor negative financial impact on charitable organisations providing services during weekend charging hours (e.g. soup kitchens run by faith groups or food banks) and which are accessed by those on low incomes.</p> <p>The CCZ has the highest levels of public transport accessibility in London, and probably in the UK. This is reflected in the already-high public transport mode share in central London. Prior to the pandemic, a 90 per cent sustainable mode share for trips made by London residents within central London had been achieved, with almost all remaining car trips potentially switchable to</p>

	Issue/comment	Times raised	Our response
			<p>sustainable modes. Service levels on public transport are now near normal, including the planned operation of some parts of the Night Tube following its return in November 2021 and increased levels on the National Rail following the reduction through the pandemic. This now provides a more standard and reliable level of public transport provision for users throughout the day across the week.</p> <p>It is also important to note the levels of car ownership for low income households in central London, with over 90 per cent of households earning under £10,000 not owning a car, and more than 70 per cent for both households earning between £10,000 to £20,000 and £20,000 to £30,000.²³ Those in low income households (under £20,000) are also more likely to walk (95 per cent) or use the bus (59 per cent) at least once a week,²⁴ with those using the bus also being impacted by the unreliability caused by congestion.</p>
	Impact on churches' ability to undertake charitable and community activities and raise funds, and the assessment of impacts on church activities in the IIA		<p>As set out in Row A, the impact of the Congestion Charge on people's ability to access central London is to some extent mitigated by the extensive public transport options and associated concessionary fares, while for those who choose to drive there are discounts and exemptions available on the Congestion Charge for people/vehicles meeting certain criteria. This is expected to limit the impact on the ability of congregation members to travel into the CCZ at the weekend.</p> <p>As set out in row B, the IIA assessed the impacts on all protected characteristics, including faith and religion. Although the discussion is throughout the IIA, the potential impacts are summarised in Table 0-2 (which is reproduced in this report at Table 1). Listed below are three extracts which deal specifically with the issues of churches' charitable activities.</p> <p>This includes a section on 'Access to health and social care and other social infrastructure', under which it listed a potential impact of an increased cost of access to attend religious services during weekend charging hours in the CCZ for those unable to travel by public transport or attend at other times. It assessed the overall impact as neutral, and noted that cheaper public transport acted as a mitigation.</p>

²³ <https://content.tfl.gov.uk/travel-in-london-report-12.pdf>

²⁴ <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

	Issue/comment	Times raised	Our response
			<p>Another section on 'Social Integration' identified a <i>potential Financial impact on charities delivering mobile services (or requiring transportation of goods/equipment) to vulnerable people during weekend charging hours</i>. This was assessed as having a minor negative impact. It suggested that we could consider further reimbursements and exemptions. In considering this suggestion, we have taken into account the practicalities of such an approach; its likely impact on the CC scheme's objectives; and the potential precedent it would set for similar discounts and reimbursements (or exemptions). As described in Table 30, CC scheme discounts and exemptions have historically been targeted at people or services who have less choice about whether to drive in the zone, are performing a public service or incentivise the use of cleaner vehicles to improve air quality. It would in practice also be very difficult to define and enforce this type of discount, and could undermine achieving the scheme's objectives. If a discount were given to church-related charitable activities, this would almost certainly lead to calls for it to be extended to all charitable activity, thus undermining the traffic and congestion management objectives of the CC scheme.</p> <p>Another section on 'Access to work and training' identified a <i>potential Impact for people that drive to weekend school/adult education and education offered by faith groups within CCZ</i>. It noted that the 9+ seat vehicle 100 per cent discount could act as a mitigation and did not identify potential further mitigations.</p>

Financial impacts

Stakeholders

- 5.3.9. The London Borough of Camden highlighted that the proposals will harm London's economy, with data showing that reducing private car use provides economic benefits by freeing up space and reducing journey times for essential journey times for essential trips that keep London's businesses and key services functioning. It stated that the extended charging hours brought in as part of the temporary changes should therefore remain in place. The response noted the GLA report on the future of the CAZ and the recommendations made within it.
- 5.3.10. The London Chamber of Commerce and Industry stated that it supported the changes to hours but not the increased charge level, and that the CC scheme constitutes a tax on business and that companies who need to use freight vehicles in the zone have no choice but to pay it. It opposed the end of the Fleet Auto Pay discount, as did the Confederation of British Industry (CBI). The CBI also highlighted that the impact of the increased charge will become significantly more expensive if the extension of the congestion zone is implemented to the North and South Circular, as has been seen with the ULEZ.
- 5.3.11. Small businesses outlined a range of comments and issues on the proposals regarding the impact on business overheads or the need to pass the increased cost to customers. In particular, this included broad support for the proposed weekday charging hours compared to those operating through the temporary changes, broad opposition to charging on Saturdays and Sundays across a variety of sectors, including construction work and vehicles required to support this, and those who work at weekends when their clients premises are vacant. Other issues raised included the cost and administrative implications for the removal of the Auto Pay/Fleet Auto Pay discount, the impact from increased operating hours and charge level on margins and costs for customers, and that it will drive people/customers/visitors away from central London. While not common across businesses, a further comment highlighted the impact the proposals would have on the poor and disadvantaged, while support was shown for increasing the charge level by another.
- 5.3.12. Faith organisations also highlighted the impact of the Congestion Charge on the poor and the disproportionate impact it has on them, alongside Harrow Council for Justice.
- 5.3.13. Addison Lee said that the weekend charges would damage the leisure industry and slow their recovery.
- 5.3.14. Those representing car clubs including the BVRLA, CoMoUK and Zipcar disagreed with the assumption made in the IIA that the proposed changes would largely be neutral for businesses as they could pass on the additional cost. Due to their operating models, and cars being used by a number of different users per

day, car clubs don't tend to pass on the Congestion Charge directly to their customers so those businesses will feel the financial impacts more starkly.

- 5.3.15. London Chinatown Chinese Association said that weekend and bank holiday charging would have a negative impact on London's economy and that a downturn of activity in central London would have implications for the wider economy.

Table 19: Detailed responses to Financial Impacts

	Issue/comment	Times raised	Our response
A	Will have detrimental impact on businesses including PHVs and car clubs (general comments)	739	<p>While the CC scheme has been in place since February 2003 and businesses which need to use the zone – either because they are located there or because they deliver or service within the zone – are likely to have adapted their practices in order to manage the impacts, the proposed increase in charge level will require a continuation of this adaption. This may also include where businesses have previously benefitted from the reduced charge level for those using Auto Pay or Fleet Auto Pay. Congestion and delay are also a cost to many businesses in terms of uncertainty regarding delivery times or making an area unattractive to customers, so it is also important from a business perspective to tackle this issue.</p> <p>The introduction of charging at the weekend has been proposed to address the levels of congestion that were seen on Saturdays and Sundays and represents a new charging period for businesses and their customers travelling in the CCZ. This proposal is made in response to the changes to observed traffic in recent years, with weekend traffic being higher than on weekdays, with a greater proportion of cars. The hours in which this increased traffic is observed does, however, differ at the weekends. Although entries to the zone have been higher on Saturday and Sunday compared to an average weekday, overall traffic levels are lower on weekend mornings. Given the different types of journey and when journeys are made at weekends compared to weekdays, we are proposing shorter charging hours at the weekend. This is expected to help mitigate the impact on some business and customers, while tackling traffic and congestion during the busiest part of the day. We will continue to keep the CC scheme under review in future to ensure that it remains effective.</p> <p>Central London has a high level of accessibility by public transport from across the country, with taxis also providing a link into central London, enabling people to visit without the car, and with about 90 per cent of people doing so pre-pandemic. For those who are reliant on their car for access, the Blue Badge discount is available, while discounts are also available for residents and holders of the CVD. Where goods or items need to be collected, opportunities are available outside of changing hours and we encourage the use of micro-consolidation and onward distribution by electric vehicle and cargo bike where possible as set out in our Freight and</p>

	Issue/comment	Times raised	Our response
			<p>Servicing Action Plan.²⁵ Where these alternatives are not a viable option the proposed changes to the CC scheme will reduce traffic and help make journeys more reliable.</p> <p>While the IIA identified these impacts, some businesses have different operating models in which they may see different impacts. This includes businesses such as car clubs and PHV operators, where the business purpose is vehicle travel in the CCZ. We have seen that since the removal of the PHV exemption, many operators have chosen to spread the cost of the charge, including through higher fares or surcharges for customers. It will be up to operators to decide how to manage increased costs as a result of these proposals, but they could be passed on, in part or in whole to the customer. Similarly, although it may be difficult for car club operators to pass on the charge to specific users entering the zone with multiple users per day, it may be possible for operators to pass on increased charges, in whole or in part, through increased rates for all drivers in the zone (or all drivers). Both PHV and car club operators may be able to specialise their operations using / re-distributing vehicles in the CCZ which are eligible for the Cleaner Vehicle Discount.</p>
B	Will have detrimental impact on those struggling financially/on lower incomes (e.g. debt)	650	<p>The assessment of the potential impacts on those on low incomes was set out in the IIA and is summarised in section 2.5. This included minor positive impacts arising from improved bus journey time reliability (buses are an important mode used by those on lowest incomes) and minor negative impact on people working in specific sectors including PHV drivers and those in the leisure, hospitality and retail sectors who are on lower incomes. There may also be a minor negative financial impact on charitable organisations providing services during weekend charging hours (e.g. soup kitchens run by faith groups or food banks) and which are accessed by those on low incomes.</p> <p>The CCZ has the highest levels of public transport accessibility in London, and probably in the UK. This is reflected in the already-high public transport mode share in central London. Prior to the pandemic, a 90 per cent sustainable mode share for trips made by London residents within central London had been achieved, with almost all remaining car trips potentially switchable to sustainable modes. Service levels on public transport are now near normal, including the planned</p>

²⁵ TfL, 2019 <https://content.tfl.gov.uk/freight-servicing-action-plan.pdf>

	Issue/comment	Times raised	Our response
			<p>operation of some parts of the Night Tube following its return in November 2021 and increased levels on National Rail following the reduction through the pandemic. This now provides a more standard and reliable level of public transport provision for users throughout the day across the week.</p> <p>It is also important to note the levels of car ownership for low income households in central London, with over 90 per cent of households earning under £10,000 not owning a car, and more than 70 per cent for both households earning between £10,000 to £20,000 and £20,000 to £30,000.²⁶ Similar levels can be observed in inner London, with 80 per cent of households earning under £10,000 not owning a car, 70 per cent of those between £10,000 to £20,000 and approximately 60 per cent for those between £20,000 to £30,000. Those in low income households (under £20,000) are also more likely to walk (95 per cent) or use the bus (59 per cent) at least once a week,²⁷ with those using the bus also being impacted by the unreliability caused by congestion.</p>
C	Will have detrimental impact on London's economy	517	<p>The IIA assessed the overall impacts on London's wider economy as neutral. Output within the CCZ contributes nearly £150bn / year to London's economy. In this context the impact of the proposed changes is small, and it is not expected that wider supply chains would be affected. A GLA commissioned report undertaken by Arup/Gerald Eve/LSE⁵ further outlined a series of priorities for the Central Activities Zone (CAZ), of which the CCZ is a part. The recent Arup/GLA Report²⁸ on London's post-pandemic economic recovery recommended that the Congestion Charge be kept under review in order to keep traffic low as a way of ensuring a sustainable and healthy central London, and which included a recommendation to review the Congestion Charge to prevent a car-led recovery and ensure that traffic levels are kept low.</p> <p>Congestion presents a significant cost to London's economy. In the IIA it was estimated that nearly 37,500 hours of travel time will be saved per week due to the proposed changes to the</p>

²⁶ <https://content.tfl.gov.uk/travel-in-london-report-12.pdf>

²⁷ <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

²⁸ https://www.london.gov.uk/sites/default/files/caz_economic_future_phase_2_report.pdf

	Issue/comment	Times raised	Our response
			Congestion Charge. This is worth over £550k a week (2021 prices and values), or approximately £29m per year.
D	Will have detrimental impact on theatres/ restaurants/ nightlife (e.g. West End)	471	<p>When determining the right time to end the Congestion Charge operating hours on weekdays, we have considered the changing and uncertain nature of weekday travel patterns and the impact on the evening economy in central London. The weekday charging hours are proposed to replicate those seen pre-pandemic, with the impact on drivers being the additional charge level between the pre-pandemic and proposed new charge level. People who drove in pre-pandemic following the end of the congestion charge will continue to not be affected. The proposed weekday charging hours are the same as they were pre-pandemic</p> <p>The proposed weekend charging period will overlap with matinee performances and have an impact on people driving to work at theatres and visit them to see a show. Pre-pandemic, only a small proportion of people travelled into central London by car with it having high levels of accessibility throughout the rest of the city and further afield. Reducing the number of non-essential motorised trips being made in the CCZ will make journeys more reliable for people arriving by car and coach providers, while also likely to reduce demand for parking for those who do still choose to drive.</p>
E	Will have a detrimental impact on my business/ livelihood	198	Please see response in row A.
F	Will have a detrimental impact on small businesses	146	Please see response in row A
G	Congestion Charge costs will be/are being passed onto residents/custo	21	Please see response in row A.

	Issue/comment	Times raised	Our response
	mers from businesses/ services		
H	Will push people out of London/cause people to move away/relocate	8	This was not an impact identified in the Integrated Impact Assessment carried out by Jacobs or raised by stakeholders. Most trips (around 90 per cent) in central London are made by public transport or active modes, and car ownership is around 40 per cent for households in inner London (and 56 per cent for London overall) and would only be affected if they drive into the zone during charging hours. This means that most people would not be directly affected by the proposals.
The following issues were raised by stakeholders in addition to the coded responses above.			
	Removal of Fleet Auto Pay discount will have financial impact		<p>Auto Pay for private drivers was introduced in 2011 following customer feedback and in the context of removing the discount for monthly and annual charges that had previously been available. Auto Pay is more convenient for users and reduces costs to TfL. To encourage people to sign-up for this method of payment following its introduction a £1 discount was given. The discount has been successful in encouraging people to sign-up for Auto Pay, with more than three quarters of customers paying in this way.</p> <p>Payment accounts for commercial vehicles pre-date the introduction of CC Auto Pay, with a Fleet Scheme available at the start of the CC scheme, later replaced by Fleet Auto Pay. With Fleet Auto Pay, registered operators of ten or more vehicles received a £1 discount on the daily charge. This was introduced to offer a comparable discount to that available for drivers who chose to pay the charge monthly or annually. When CC Auto Pay was introduced, this approach was retained and also applied to Fleet Auto Pay (at the same time the minimum level for Fleet Auto Pay account was reduced from ten to six vehicles).</p> <p>Auto Pay and Fleet Auto Pay help make the process of paying the Congestion Charge easier and remove the risk of incurring a PCN for non-payment. By signing-up for either service, customers are automatically billed monthly for the number of charging days their vehicle(s) is/are used within the CCZ. Fleet Auto Pay is available to businesses with six or more vehicles, allowing all vehicles to be added to one account.</p>

	Issue/comment	Times raised	Our response
			<p>Removing the discount reinforces that access to road space in central London should not be discounted for those who would otherwise be liable to pay the full charge. Auto Pay and Fleet Auto Pay still provide an attractive proposition for drivers and fleet managers as it removes the administrative burden of having to pay the Congestion Charge every day they drive or a fleet vehicle(s) is used in it, while also removing the risk of receiving a PCN for non-payment. Fleet Auto Pay also reduces the burden of having to utilise multiple accounts to manage payments for fleets of vehicles travelling into the zone.</p> <p>Please note that this issue is also covered in the section below on Auto Pay and Fleet Auto Pay.</p>
	Proposal is a tax on businesses		<p>As described in the consultation materials, the changes are proposed in order to ensure that the CC scheme remains an effective tool in managing traffic and congestion in London. It thereby helps to achieve the other objectives of the MTS such as an increased sustainable mode share, improved air quality and a reduction in private vehicle use. For trips within central London, it sets a target of 95 per cent sustainable mode share by 2041, for trips to and from central London this target rises to 99 per cent and it also aims for a 10 per cent reduction in freight traffic in the AM peak by 2026.</p> <p>In developing the proposals, we undertook modelling of the expected impacts (described in detail in the Supplementary Information, which is at Appendix A), and this demonstrates that the changes are likely to help to achieve our aims with regard to traffic reduction, while also bringing other benefits to London.</p> <p>The CC scheme has been in place since February 2003 and businesses which need to use the zone – either because they are located there or because they deliver or service within the zone – are likely to have adapted their practices in order to manage the impacts, and through the week will not need to further adapt to new charging hours as the proposed changes reflect those seen pre-pandemic. Congestion and delay are also a cost to many businesses in terms of uncertainty regarding delivery times or making an area unattractive to customers, so it is also important from a business perspective to tackle this issue.</p>

	Issue/comment	Times raised	Our response
			<p>The introduction of charging at the weekend has been proposed to address the levels of congestion that were seen on Saturdays and Sundays and presents a new charging period for businesses and their customers travelling in the CCZ. This proposal is made in response to the changes to observed traffic in recent years, with weekend vehicle entries being higher than on weekdays, with a greater proportion of cars. The hours in which this increased traffic is observed does, however, differ at the weekends. Although entries to the zone have been higher on Saturday and Sunday compared to an average weekday, overall traffic levels are lower on weekend mornings. Given the different types of journey and when journeys are made at weekends compared to weekdays, we are proposing shorter charging hours at the weekend. This is expected to help mitigate the impact on some business and customers, while tackling traffic and congestion during the busiest part of the day. We will continue to keep the CC scheme under review in future to ensure that it remains effective.</p> <p>Addressing congestion will help to improve reliability for businesses and improve journey times, reducing the additional costs associated with these and potentially creating further opportunities when travelling into the CCZ. The changes also support the longer-term recommendations of a report commissioned by the GLA and undertaken by Arup/Gerald Eve/LSE on the future of the Central Activities Zone (CAZ),⁵ which included a recommendation to review the Congestion Charge to prevent a car-led recovery and ensure that traffic levels are kept low.</p>
	Impact on car clubs and assessment of this in the IIA		<p>The Economy and Business section of the IIA considered impacts on employment, businesses, and London's wider economy. For all three it assessed the likely impacts as neutral overall. Within this it focussed on specific groups including for example car users, PHV users and goods vehicles.</p> <p>A workshop on Economy and Business was undertaken to inform the IIA, and the attendees are listed at Appendix G3 of the IIA, as are the main issues raised. For this workshop, attendees included the British Vehicle Rental and Leasing Association (BVRLA) as a representative group for this sector.</p> <p>In setting up these workshops, we considered the scale and likely impact of the proposals, and whether they would be likely to have particular impacts on any specific business sector. It is not</p>

	Issue/comment	Times raised	Our response
			<p>practicable to speak to every possible business organisation in London, and so invitees are chosen with the intention to get as wide a range of views as possible from groups most likely to be impacted, and to focus on representative organisations rather than individual businesses where possible.</p> <p>Similarly, the assessment of impacts pertains to the general and likely impact on employment, business and the economy as a whole. It is not intended – and would not be practical – to assess impacts on individual sectors or businesses (unless there are likely to be specific and significant impacts from proposals on one particular group, for example in the 2018 consultation on PHV exemption removal). As noted in the IIA, <i>the forecasting undertaken suggests a reduction of approximately 1 per cent in people accessing the CCZ by car or PHV under the Proposed Changes. This is likely to overstate the total impact as some of these trips will now be undertaken by public transport and active modes. A reduction of this magnitude is unlikely to affect businesses, at an aggregate level, within the CCZ.</i></p> <p>Regardless of this, we have considered the points raised by car club respondents about the difficulty of passing on the Congestion Charge given that multiple users could use a car in the CCZ in any given day. Costs associated with the Congestion Charge have been part of businesses' operating models since the charge was first implemented in 2003. Because any given car club vehicle will be used multiple times in any charged day, the opportunity to spread the cost between users exists, albeit it may be an additional burden to companies to do this. Car club fleets have a higher percentage of electric vehicles than private cars in London. In order to reduce the impact of paying the charge, it may be possible for car clubs to move to a model whereby electric vehicles are located and re-distributed to the CCZ as these would be eligible for the CVD.</p>

Impact on active travel and public transport

Stakeholders

- 5.3.16. The London Cycling Campaign (LCC) noted that some of the proposals would not support the aims of the MTS by undermining the uptick in cycling observed during the temporary changes. London Living Streets supported weekend charging as a way of making central London a more welcoming environment for active travel in line with the MTS. Camden Cycling Campaign opposed the reduction in hours saying this would encourage people to drive and negatively affect safety, air quality and active travel. Southwark Cyclists made similar comments.
- 5.3.17. LB Camden stated that given traffic levels in the borough had already risen, this risked fuelling a car-based recovery. They added that encouraging traffic within the CCZ after 18:00 would increase congestion, negatively affect bus journey time reliability, and increase noise and air pollution.

Table 20: Detailed responses to impact on active travel and public transport

	Issue/comment	Times raised	Our response
A	Proposed changes will negatively impact active travel (walking, cycling)	108	The proposed changes to the CC scheme have been developed to support the long-term aims of the MTS, with the aim for 80 per cent of journeys to be made by walking, cycling or public transport by 2041; however, this is higher for trips within central London (95 per cent) and between central London and inner / outer London (99 per cent). The proposals are also designed to help address short- to medium-term transport challenges arising from the pandemic that are likely to persist.
B	Proposed changes will negatively impact public transport	49	The proposed charging hours take account of the unknown travel patterns that will be seen in the evenings as London recovers from the pandemic and longer-term and target the busiest times at the weekend. It is also anticipated that the higher charge, alongside cumulative impacts from other proposed changes, may lead to mode shift and see a reduction in traffic volumes in the CCZ in the evening compared to those seen pre-pandemic.
C	Proposed changes will positively impact active travel (walking, cycling)	6	The proposed changes are forecast to see more people walking, cycling and using public transport in the CCZ alongside a reduction in the number of people driving in it. This forecast includes 6,000 new trips made by public transport and 2,000 new walking and cycling trips made each weekday and 8,000 new public transport and 3,000 new walking and cycling trips each day on the weekend. Alongside the previous and continued investment that has been made to make walking and cycling more attractive and safer travel options, this will further emphasise the role of sustainable modes for travel to, from and within central London and discourage making non-essential motorised trips. The reduction in congestion, alongside priority measures, will help to make buses more reliable.
D	Proposed changes will positively impact public transport	3	The People theme of the IIA (and the Connectivity aspect), identified minor positive impacts on active travel in central London and also minor positive impacts on bus journey times. These would come about as a result of the reduced traffic and improved air quality and perceptions of safety brought about by the proposals.

	Issue/comment	Times raised	Our response
			<p>It also identified a potential minor negative impact on bus crowding as a result of people who used to drive in the CCZ switching to other modes. This could have differential impacts on some groups including disabled people and parents/carers travelling with young children.</p> <p>We have a number of approaches in place to manage crowding on our network including information on our website and journey planning tools about quieter journey times.²⁹ We also provide information and encouragement for people to walk, cycle and scoot on shorter journeys.</p>

²⁹ <https://tfl.gov.uk/status-updates/busiest-times-to-travel>

Wider impacts, including air quality impacts

Stakeholders

- 5.3.18. A number of small businesses made comments on the general impacts of the proposed changes. This included the Congestion Charge having no impact on congestion as people driving in the CCZ are only doing so because they have to. It was also stated that the proposed changes won't help to reduce pollution due to the reduction in charging hours compared to the temporary change. Others were concerned that the reduction in weekday charging hours would increase congestion and have a negative impact on freight after 18:00.
- 5.3.19. LB Camden stated that given traffic levels in the borough had already risen, this risked fuelling a car-based recovery and that encouraging traffic within the CCZ after 18:00 would increase congestion, negatively affect bus journey time reliability, and increase noise, air pollution and road danger. It noted the reductions to WHO limits for air pollution.

Table 21: Detailed responses to Wider Impacts

	Issue/comment	Times raised	Our response
A	Proposed changes will cause more congestion/increase it	467	Our modelling indicates a £15 charge is expected to reduce car traffic (measured in total car kms driven) in the CCZ by around four per cent on an average weekday in proposed charging hours, and by around 15 per cent in charged hours at the weekend.
B	Proposed changes will have no impact to congestion	465	<p>The four per cent weekday reduction is significant in an area where road space is heavily constrained and demand is high. The reduction in car usage is expected to result in an increase in sustainable travel to, within and from the CCZ with around 6,000 new trips made by public transport and 2,000 new walking and cycling trips made into each weekday. On Saturdays and Sundays, sustainable travel to the CCZ is also expected to increase, with it estimated that there will be around 8,000 new public transport trips and 3,000 walking and cycling trips each day on the weekend.</p> <p>The proposed changes have been targeted at challenges identified by the MTS and will be kept under review to ensure the CC scheme remains effective.</p>
C	Proposed changes will make air quality/pollution worse	247	While the primary aim of the CC scheme is to reduce traffic and congestion, it also delivers environmental benefits including reductions in emissions of air pollutants and carbon. The proposed changes have been assessed as having a positive impact on the environment compared to the pre-pandemic scheme. This includes a reduction of approximately 1.5 per cent in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within central London and an approximate reduction of 1.5 per cent in annual emissions of CO ₂ within central London.
D	Proposed changes will have no impact to air quality	153	<p>The IIA assessed the benefits to air quality as being minor positive; in turn this has positive impact on human health.</p> <p>A further way in which the CC scheme improves air quality is via the discount for lower-polluting vehicles which has been a feature since it was implemented, and which has been tightened over time to maintain the benefits and provide an incentive for those who do need to drive to do so in the cleanest possible vehicle. The criteria for the Cleaner Vehicle Discount (CVD) was updated</p>

	Issue/comment	Times raised	Our response
			on 25 October 2021, with only battery electric or hydrogen fuel cell vehicles eligible for the 100 per cent discount.
E	Proposed changes will make safety issues worse	125	The IIA identified that the forecast reduction in traffic will lead to minor positive impacts on road safety including for people walking and cycling. This will help to support the Vision Zero objective of the MTS.
F	Proposed changes will have a positive impact on congestion/will reduce it	43	Please see response in rows A and B.
G	Proposed changes will have no impact to safety	20	Please see response in row E.
H	Congestion charge pushes congestion and pollution outside of the zone	18	Monitoring of the impacts of the CCZ has not shown this to be the case, with traffic congestion not increasing on the inner ring road or key radial routes as a consequence of the CC scheme ¹⁹ . Incentivising more people to walk, cycle or use public transport for trips has wider benefits for areas and the times outside of charging hours. We will continue to monitor traffic levels and pollution in London.
I	Proposed changes will make noise pollution worse/create more noise	16	The IIA stated that the forecast changes in traffic are unlikely to be perceptible in terms of noise.
J	Proposed changes will have a positive impact on air	16	Please see response in rows C and D.

	Issue/comment	Times raised	Our response
	quality/will improve it		
K	Proposed changes will have a positive impact on safety issues/improve safety	6	Please see response in row E.
L	Proposed changes will have no impact to noise pollution	3	Please see response in row I.
M	Proposed changed will have a positive impact on noise pollution/reduce it	2	Please see response in row I.
The following issues were raised by stakeholders in addition to the coded responses above.			
	Climate changes/ net zero carbon target		<p>In 2018, the Greater London Authority (GLA) published Zero Carbon London: A 1.5°C Compatible Plan, which presented a range of energy system scenarios for London consistent with a 2050 Net Zero target. In 2020, the Mayor of London committed to set a target for carbon neutrality by 2030 which was reconfirmed by the Mayor's 2021 Manifesto.</p> <p>The IIA said that the proposals as leading to a minor reduction (approximately 1.5%) in annual emissions of CO₂ within central London. As such, this was assessed as a minor positive effect.</p>

5.4. Comments on specific proposals

5.4.1. This section provides a summary of the comments made in relation to specific proposals as consulted on and provides our responses to each of the proposals in turn.

Table 22: Proposals put forward in the consultation (summary)

Charge level	A daily charge of £15
Charging days & hours	A charge period of 07:00 - 18:00 Monday to Friday and 12:00 - 18:00 Saturday and Sunday and Bank Holidays There would be no charge between Christmas and New Year
Residents' discount	90 per cent residents' discount, opened to new applicants Removal of online and app resident pre-payment
Pay next day	£17.50 charge level to pay after the day of travel with the deadline for payment extended to three days after travel
Auto Pay & Fleet Auto Pay	No discount for payments made by Auto Pay or Fleet Auto Pay
Reimbursements	Retain and adapt reimbursement arrangements which would apply in exceptional circumstances

Charge level

5.4.2. Fifty-one per cent of respondents to the question on the effectiveness of the proposed Congestion Charge level³⁰ thought that it would have a moderate or major effect in delivering the aims of the Congestion Charge,³¹ while 44 per cent of respondents thought it would have no or only a minor effect. The main comments by respondents in the open questions are outlined in Table 23.

Stakeholders

5.4.3. Westminster City Council and LB Islington supported this proposal, as did LB Camden (who also called for annual increases in line with inflation).

5.4.4. The City of London said it supported the charge level but questioned how much it would influence driver behaviour on weekdays as commercial drivers will either absorb the cost or pass it on; this is not a call for a higher Congestion Charge but for wider road pricing in London (see Table 29).

³⁰ How effective do you consider the following proposed changes to the Congestion Charge scheme would be in achieving our aims set out above? Options to answer were: No effect; Minor effect; Neutral; Moderate effect; Major effect

³¹ The aims of the Congestion Charge are to reduce traffic and congestion in central London and help achieve the objectives of the Mayor's Transport Strategy

- 5.4.5. The Federation of Small Businesses (FSB) said the charge level should return to £11.50, stating that an increase would penalise small businesses' recovery and would lead to passing on of costs to customers or changing of operating practices. Addison Lee also said it should return to £11.50.
- 5.4.6. Logistics UK opposed the charge increase as a new cost to businesses which have little choice about using vehicles and would increase the cost of servicing London, alongside ULEZ and PCNs.
- 5.4.7. The London Cycling Campaign (LCC) supported the charge level.
- 5.4.8. London Living Streets supported the charge increase and stated that it wanted to see regular above-inflation increases scheduled for the future.
- 5.4.9. London Forum of Amenity & Civic Societies supported the charge increase.
- 5.4.10. Small businesses had a variety of comments, with most highlighting the impact the increased cost would have, including impacting on overheads or costs being passed on to customers. It was also highlighted that it will place businesses in jeopardy and was an additional 'tax' on businesses. One of the small businesses outlined that the cost of the Congestion Charge should be £25 for it to be effective.
- 5.4.11. London Road Safety Council stated that while it supported the proposed hours and inclusion of weekends is deemed appropriate, a tiered approach to pricing should be considered, with larger vehicles/fleets paying more.

Table 23: Detailed responses to Charge Level

	Issue/comment	Times raised	Our response
A	Charge should be lower/oppose the proposed charge level (£15) (general comments)	617	<p>Prior to the increase in charge level introduced as part of the temporary changes to the CC scheme in June 2020, the charge was last increased in 2014. The period since 2014 is the longest time in which a permanent increase to the Congestion Charge has not been made, which has gradually eroded the deterrent effect of the charge.</p> <p>We have developed five post-COVID-19 pandemic scenarios to account for the increased uncertainty in our forecasting. In both the Reference Case and Hybrid Forecast, traffic levels, including car use, in central London increase from pre-pandemic levels.³²</p>
B	Charge should return to pre-pandemic levels (£11.50)	554	<p>Levels of traffic in central London were already identified in the MTS as a challenge, with a requirement for traffic to be reduced further. Although the long-term impacts of the pandemic are unclear, the new proposals are intended to support the MTS objectives and vision for central London and to address the short- and medium-term challenges of suppressing the car use that has arisen as a consequence of the persistent transport challenges arising from the COVID-19 pandemic.</p> <p>With demand for road space being particularly high in central London, it is critical that the limited road space is used effectively for the essential movement of people and goods. The CC scheme is one of the tools available to us to help manage demand in central London and the proposals have been developed in this context.</p> <p>Reducing the charge or returning to the pre-pandemic level would not be effective at delivering the objectives of the MTS.</p>

³² TfL has undertaken a scenario planning exercise to help inform future decision making, given the need to understand the impact of the pandemic on the economy and travel demand in the future. Five post-pandemic scenarios were developed to account for the increased uncertainty. From these the Hybrid forecast can be drawn as the central position of plausible outcomes and is kept under regular review. When used in combination with a more traditional Reference Case forecast we have the ability to do more detailed assessments. The 'Reference Case', defined in a similar way to pre-pandemic forecasts, assumes no further restrictions are brought in and people start returning to their pre-pandemic routines so that by the time we reach the first forecast horizon (2026) there is no additional behaviour change. More information can be found in '[Travel in London – report 13](#)' from pg. 40

	Issue/comment	Times raised	Our response
C	Charge should be higher (general comments)	194	<p>£15 was proposed to ensure the charge provides an effective deterrent to reduce the level of traffic and congestion in central London. The charge level of £15 is expected to reduce car kms in the CCZ by around four per cent between 07:00 - 18:00 on weekdays compared to a situation where no changes are made to the pre-pandemic scheme, while at the weekend, if introduced as proposed, the charge is expected to reduce car kms between 12:00 - 18:00 by 15 per cent compared to the pre-pandemic scheme.</p> <p>A higher charge was not considered to be appropriate due to the need to balance the impacts on businesses and individuals. While previous assessments have shown that a higher charge could have a more significant impact on traffic in the CCZ, a charge greater than £15 was seen as having too significant an impact, such as on the evening economy in central London, those who need to carry large or heavy loads, or drive for shift-work, at the current time.</p> <p>As outlined in the MTS, we will keep the CC scheme including the charge level under review to ensure its continued effectiveness in meeting the MTS objectives.</p>
D	Support/agree with the proposed charge level (£15)	184	We have noted these comments.
E	Charge should be lower for weekends (Saturday and Sunday)	29	Pre-pandemic, car and PHV traffic in the CCZ was higher on Saturdays and Sundays (over 70 per cent) than an average weekday (50 per cent). When developing the charge level to be applied on weekdays and at the weekend, we considered traffic levels, the different purposes and traffic patterns of travel, and the impact on travel choice from introducing a charge for many people who will not previously have travelled into the zone during charging hours at weekends. A charge level of £15 is therefore assessed to be appropriate and justified at the same level for weekday and weekend charging hours.
F	Charge should be lower for other specified periods	16	

	Issue/comment	Times raised	Our response
G	Charge should be higher for weekdays (Monday - Friday)	15	
H	Charge should be lower for weekdays (Monday - Friday)	6	
I	Charge should be lower on Sundays only	5	
J	Charge should be higher for other specified periods	4	Pre-pandemic, throughout charging hours on weekdays, total traffic in the CCZ was broadly consistent throughout the day following an initial increase at the start of the charging period, a uniform charge / charging period across the day is therefore considered most appropriate. Maintaining a consistent charge level throughout charging hours allows drivers to easily understand what charge level they will need to pay and reflects high levels of traffic throughout the day.
K	Charge should be higher during peak/rush hours	2	
L	Charge should be lower during peak/rush hours	1	
M	Charge should be higher for weekends	1	Please see the response in Row E.
The following issues were raised by stakeholders in addition to the coded responses above.			
	Charge level should be increased annual in line		This approach is not part of the current proposals and the Scheme Order does not make provision for an annual increase. Rather, our approach with the Congestion Charge has been to keep the scheme under review and propose to make changes when evidence indicates that they would help to ensure the ongoing effectiveness of the scheme. With

	Issue/comment	Times raised	Our response
	with / above inflation		regard to charge level, inflation is one of the factors to consider, but the modelled impacts of changes and the likely impacts also form part of the consideration. Changes to the CC scheme are subject to consultation (except in emergency circumstances), with the charge last being increased in 2014, before the temporary changes were introduced in 2020. While previous assessments have shown that a larger increase could have a more significant impact on traffic, we have proposed a charge level which provides a worthwhile traffic benefit while balancing the impact on individuals and businesses. This will be kept under review as set out in the MTS.
	Higher charge level is a tax on businesses		<p>As described in the consultation materials, the changes, including the £15 charge level, are proposed in order to ensure that the CC scheme remains an effective tool in managing traffic and congestion in London. It thereby helps to achieve the other objectives of the MTS such as an increased sustainable mode share, improved air quality and a reduction in private vehicle use. For trips within central London, it sets a target of 95 per cent sustainable mode share by 2041, for trips to and from central London this target rises to 99 per cent and it also aims for a 10 per cent reduction in freight traffic in the AM peak by 2026.</p> <p>In developing the proposals, we undertook modelling of the expected impacts (described in detail in the Supplementary Information), and this demonstrates that the changes are likely to help to achieve our aims with regard to traffic reduction, while also bringing other benefits to London.</p> <p>Congestion and delay are also a cost to many businesses in terms of uncertainty regarding delivery times or making an area unattractive to customers, so it is also important from a business perspective to tackle this issue.</p>
	Charge level should have tiered approach with larger vehicles paying more		This is not part of the current proposals. Larger passenger vehicles such as buses, coaches and vehicles with 9+ seats make more efficient use of road space than smaller private vehicles. This is why these vehicles are subject to discounts and exemptions. Larger vehicles providing goods and services to central London are also more efficient users of road space than several smaller vehicles being used for the same purpose. The Freight and

	Issue/comment	Times raised	Our response
			Servicing Action Plan ³³ sets out our work and proposals to work with the freight industry to minimise their impact on emissions and the road network and to meet the Mayor's Vision Zero ambition of nobody killed or seriously injured on London's streets by 2041. Reducing congestion may also support consolidation of freight vehicles as fewer vehicles may be needed to make the same number of deliveries if delay and journey times are reduced.

³³ <https://content.tfl.gov.uk/freight-servicing-action-plan.pdf>

Charging days and hours

- 5.4.12. A wide range of responses were received that outlined opposition or support of the proposed changes to the operational hours of the Congestion Charge. These have been considered together, as responses to the proposed changes include suggestions for amendments or general comments on the proposed operating hours of the CC scheme as a whole.
- 5.4.13. 62 per cent of respondents thought the effectiveness of the proposed weekday charging period of 07:00 - 18:00 would be moderate or major, with 34 per cent indicating no or only a minor effect. For weekend and bank holiday charging, 45 per cent of respondents thought charging between 12:00 - 18:00 on Saturdays and Sundays would have a moderate or major effect, while 50 per cent thought it would have no or only a minor effect. The main comments and issues raised by respondents in the open questions are outlined in Table .

Stakeholders

- 5.4.14. Caroline Pidgeon AM supported a reduction in weekday charging hours compared to that put in place by the temporary changes in summer 2020, but stated that 18:00 seemed too early, and that the reasons for this time could be clearer. Keith Prince AM on behalf of the GLA Conservative Group stated that the hours should return to those in place in 2019, with no weekend charging. Sian Berry AM said charging should be retained in weekday evenings and in the absence of the Night Tube and threats to night buses, it was important not to incentivise car use; and also opposed the charge-free period between Christmas and New Year as sending the wrong message about car use.
- 5.4.15. London Living Streets called for charging to continue until 22:00 seven days a week as a means of reducing air pollutants and carbon emissions and contributing to Vision Zero. London TravelWatch supported weekend charging. The London Cycling Campaign (LCC) opposed the weekday charge ending at 18:00.
- 5.4.16. Westminster City Council welcomed the 18:00 end time for weekday charging saying that it would help London's economy recover, but did not support weekend and Bank Holiday charging because these would hinder this recovery and noted that many religious services take place on Saturday and Sunday (see section on Specific Impacts above). Westminster City Council said that many roads in central London were less busy at the weekend. It supported the proposal for a charge-free period between Christmas Day and New Year's Day.
- 5.4.17. The City of London supported the changes to weekday hours and said they would support the economic recovery, help avoid a car-based recovery and be in line with carbon and transport goals. But it questioned the need for Sunday and Bank Holiday charging, saying that not having a charge at that time would help support the leisure and cultural sectors and address some of the potential impacts on faith communities.

- 5.4.18. LB Tower Hamlets stated that the reduction in operating hours of the charge at weekends and during weekday evenings will make it more difficult to achieve targets in sustainable mode share in both its local and Mayor of London's Transport Strategy. It called for a retention of the 07:00-22:00 hours all week.
- 5.4.19. LB Hackney said that it would prefer charging hours to run until 19:00 because this would mitigate the traffic using their roads and act to encourage walking and cycling; but on balance supported the proposals because of the proposed charge increase; and stated that longer evening charging hours would run the risk of making out-of-town venues more attractive, thus increasing mileage overall.
- 5.4.20. LB Camden opposed ending charging hours at 18:00 in the evenings and weekends. They stated that this, coupled with the availability of unrestricted single-yellow line parking, will encourage car journeys in the zone, and negatively affect people living and working in the area and affect traffic reduction objectives. It called upon the Mayor to consult on retaining the hours introduced temporarily for weekends and evenings. It stated that given traffic levels in the borough had already risen, this risked fuelling a car-based recovery and that encouraging traffic within the CCZ after 18:00 would increase congestion, negatively affect bus journey time reliability, and increase noise and air pollution. Finally, it noted that this approach contradicted recent Network Management Duty Guidance from the Government concerning the Streetspace schemes and supporting active travel.
- 5.4.21. LB Islington supported this proposal. London Forum of Amenity & Civic Societies supported the changes to hours and weekend charging, stating that competition for road space is greatest at the weekends.
- 5.4.22. Logistics UK welcomed the 18:00 end to weekday charging but opposed weekend charging because it would include freight vehicles even though the issue at the weekends is car use.
- 5.4.23. Borough & Bankside Ward Southwark councillors said that the proposed changes in charging hours would have a disproportionate impact on residents in the zone where they had previously only driven at the weekends.
- 5.4.24. The Federation of Small Businesses (FSB) said the move to support the night-time economy by removing the Congestion Charge after 18:00 through the week is welcome, although having the charge on weekends will be a bitter pill to swallow. Small businesses also broadly welcomed the reduction in weekday charging hours to 18:00 as a way of supporting London's economy. However, weekend and Bank Holiday charging were broadly not supported, with suggestions that it would limit recovery from the pandemic, such as through stifling weekend visitors, and that some businesses operated at weekends to avoid the weekday charge.
- 5.4.25. London Chamber of Commerce and Industry supported the 18:00 end to charging hours but noted that weekend charging is an additional cost to businesses and may adversely affect the recovery. It stated that the charge increase is a burden on businesses many of which have no choice but to operate vehicles. It stated that TfL must not rely on the charge as a way to plug funding shortfalls.

- 5.4.26. UPS supported the reduction in weekday charging hours and at weekends and bank holidays as night-time hours are less congested and allows deliveries to be re-timed to these times.
- 5.4.27. London Living Streets supported weekend charging as a way of making central London a more welcoming environment for active travel in line with the MTS. Camden Cycling Campaign opposed the reduction in hours saying this would encourage people to drive and negatively affect safety, air quality and active travel. Southwark Cyclists made similar comments. London Road Safety Council stated that while it supported the proposed hours and inclusion of weekends is deemed appropriate. The Road Danger Reduction Forum said that charging hours should not be reduced as this will reduce the effectiveness of the charge.
- 5.4.28. Aldgate Connect BID (Business Improvement District) said the charging hours were too short to have enough impact on pollution and would cause traffic at the end of charging hours. Central District Alliance BID said the proposals did not differentiate between a person who needs to drive for work and a person who could travel by public transport; and that there was less traffic justification for a weekend charge.
- 5.4.29. Faith organisations were opposed to weekend charges: most of the comments related to Sundays, but there were also comments opposed to Saturday charging. One respondent stated that prior to the election the Mayor had committed to remove the charge at weekends.
- 5.4.30. Physic Triangle Residents and Spitalfields Housing Association also stated that the Mayor had made a commitment to remove the extended hours, the latter stating that the CC scheme was a cost on tenants' day-to-day activities (it borders the zone). Bloomsbury Air stated that the extended hours should remain.
- 5.4.31. The Royal Academy of Arts welcomed the reduction in charging hours during the week and at weekends, with the Musicians Union calling for the charge to end at 17:00, stating that its members often need to use a vehicle to carry heavy equipment into central London and that there is no way to pass the cost to the promoter so it becomes a tax on their income.
- 5.4.32. Addison Lee said that weekend charges would hamper the recovery of London's leisure and nightlife economy and that many people are still reluctant to use public transport owing to safety concerns.
- 5.4.33. Railfuture opposed the reduction in weekday charging hours (compared to the temporary changes). It stated that people had got used to these hours and that traffic does not evaporate at 18:00 and that the proposal risked supporting a car-led recovery.

Table 24: Detailed responses to Charging days and hours

	Issue/comment	Times raised	Our response
A	Should be no charge for weekends (Saturday and Sunday)	2474	<p>The MTS highlights that the Congestion Charge remains a key tool in managing the use of road space in central London. Pre-pandemic, vehicle entries to the zone were higher on Saturdays and Sundays than on an average weekday, and traffic levels were similar to weekdays. Cars (including PHVs) made up a greater proportion of traffic in the CCZ on Saturdays and Sundays than an average weekday, accounting for 70 per cent of traffic over the weekend compared to 50 per cent in the week.</p> <p>Given these characteristics, the pre-pandemic charging days did not reflect the days of the week with the highest number of entries to the CCZ. It is necessary to take steps to help reduce levels of traffic and congestion seen at the weekend to ensure we meet the aims of the MTS, with the proposed charging hours reflecting this.</p> <p>Although higher entries to the CCZ were seen Saturday and Sunday pre-pandemic compared to an average weekday, overall traffic levels are lower on weekend mornings, with shorter operating hours being proposed to account for this.</p>
B	Charging period/hours for Mon-Fri should return to pre-pandemic (i.e. 07:00 - 18:00)	1425	We have noted these comments.
C	Oppose changes to include charge on Bank Holidays	501	Pre-pandemic, car and PHV traffic was higher on Bank Holidays than on an average weekday. The charge did not apply on Bank Holidays under the pre-pandemic scheme. Charging on Bank Holidays will help encourage people to use sustainable modes of travel to visit central London and reinforce that road space is in high demand at all times. Christmas Day, New Year's Day, and the days in between are proposed to be uncharged.
D	Should be no charge for Sundays	408	Please see the response in row A.
E	Other specific time changes suggested (that	376	The proposed changes to the charging times of the scheme are to address the transport challenges that are now faced in central London, taking account of the

	Issue/comment	Times raised	Our response
	do not fit into above, including different charging hours on a Saturday, or later start and finish times)		aims and objectives of the MTS. Charging at other times, or removing the charge at specific times, would not be effective in addressing these transport challenges. As outlined in the MTS, we will continue to keep the CC scheme under review to ensure that it remains effective in meeting its objectives and supporting the delivery of the MTS. Please also see response in row G.
F	Charging period/hours should replicate those used through the temporary changes	344	<p>The temporary changes to the CC scheme were brought in to address the specific transport challenges presented by the pandemic.</p> <p>While it is likely that some of the transport challenges arising from the pandemic will continue beyond the end of 2021 (such as a slow return to public transport and the risk of a car-based recovery), the proposals have been developed to ensure the CC scheme remains effective in achieving the long term objectives of the MTS. When determining the right time to end the Congestion Charge operating hours on weekdays, we have considered the changing and uncertain nature of weekday travel patterns, the impact on the evening economy in central London and on those who need to carry large or heavy loads to participate in it or drive in for shift work.</p> <p>It is also recognised that there may be cumulative impacts of the proposed package of changes which could impact overall weekday traffic and congestion levels. A higher charge level during the week (and removal of the Auto Pay and Fleet Auto Pay discount) will result in some mode shift. Charging at weekends will also influence mode choice for a new cohort of drivers, which could extend benefits to journeys made on other days.</p> <p>If the proposed new weekday charging hours are implemented, they will be kept under review to understand their impact on evening traffic.</p>
G	Charging period/hours should be reduced (general comments)	220	Charging hours have been proposed based on evidence including traffic data, wider travel trends in central London and the impacts of the proposals on people and businesses. As outlined in the MTS, road user charging schemes, including the CC

	Issue/comment	Times raised	Our response
			<p>scheme, are kept under review to ensure they remain effective in meeting their objectives.</p> <p>The proposed charging hours have been developed to address the transport challenges that are currently faced in central London, accounting for the long-term aim of the MTS and the short-medium term challenges in supporting the recovery from the pandemic. The proposed charging hours are to reflect the busiest times of day, including a different proposed start time on Saturdays and Sundays to reflect the relatively quieter period in the morning. Reducing or removing the Congestion Charge would not support delivery of the MTS.</p> <p>The charge free period over Christmas and New Year is a reflection of the lower demand for travel in the CCZ at this time and the reduced public transport options available. Traffic levels are normally around 20 per cent lower during this week. Public transport is not available on Christmas Day and, given the lower traffic levels, trips in the CCZ are likely to have less of an impact on congestion. There is not expected to be a traffic impact from this proposal compared to the pre-pandemic scheme, as those days were not previously charged.</p>
H	Support the new charging period/hours (general comment)	173	We have noted these comments.
I	Support Christmas Day to New Year Day (inclusive) charge-free period	131	We have noted these comments.
J	Do not support new charging period/hours (general comment)	128	Please see response in row G.
K	Charging period should apply 24/7/all the time	99	Please see response in row E.

	Issue/comment	Times raised	Our response
L	Charging period/hours should be extended (general comments)	97	Please see response in row E.
M	Charging period/hours for Mon-Fri should replicate those used through the temporary changes	79	Please see response in row F.
N	Should be no charge for other specified periods	26	Please see response in row G.
O	Charging period/hours for Sat-Sun should replicate those used through the temporary changes	26	Please see response in row F.
P	Charging period/hours should be extended during weekends to be the same as weekdays	20	Please see response in row G.
Q	Support changes to include charge on Bank Holidays	17	We have noted these comments.
R	Oppose Christmas Day to New Year Day (inclusive) charge-free period	15	Please see response in row G.
S	Should be no charge for weekdays (Monday - Friday)	10	Please see response in row G.
The following issues were raised by stakeholders in addition to the coded responses above.			

	Issue/comment	Times raised	Our response
	Mayor committed to removing weekend charging		<p>Proposals for the temporary changes to the CC scheme – including weekend charging until 22:00 – were brought forward in accordance with our first funding agreement with Government. The second funding agreement in Oct 2020, and subsequent rollovers, committed us to maintaining these changes as a continuing response to the coronavirus pandemic. Prior to the 2021 election, the Mayor said he didn't want to keep the charge until 22:00 seven days a week. The current proposals would revert weekday charging hours back to those pre-pandemic (07:00-18:00) and introduce shorter charging hours on a Saturday and Sunday: 12:00-18:00 only.</p> <p>The proposals consulted on are to addresses the challenges that existed pre-pandemic, with the MTS highlighting the traffic challenges in central London with high levels of traffic outside of charging hours. These proposals encourage more sustainable travel in central London while supporting the night-time economy.</p> <p>Looking forward, it is clear that some of the transport challenges that have arisen as a result of the pandemic may be longer-term features of the transport landscape in central London. New proposals have been developed to ensure the scheme remains effective in managing traffic and congestion in central London in support of long-term MTS objectives as well as effectively addressing persistent transport challenges arising from the pandemic.</p>

Residents' discount and online and app payment

- 5.4.34. Fifty-two per cent of people responding on the effectiveness of the proposals for the residents' discount thought that it would have a moderate or major effect in delivering the aims of the Congestion Charge. This is in contrast to 36 per cent of respondents who indicated they thought it would have no or only a minor effect. The main comments and issues raised by respondents in the open questions are outlined in Table 25.

Stakeholders

- 5.4.35. Borough & Bankside Ward Southwark councillors; Caroline Pidgeon AM; Keith Prince AM on behalf of GLA Conservatives; Westminster City Council; and LB Islington welcomed the re-opening of the residents' discount. Sian Berry AM said that it was time that the residents' discount was available only to those who really need it.
- 5.4.36. The London Cycling Campaign (LCC) opposed this proposal on the grounds that it would encourage residents to buy and use vehicles.
- 5.4.37. While not common to all small businesses, it was highlighted that with a 90 per cent discount available there is no incentive for residents to use an alternative mode.
- 5.4.38. London Living Streets stated that the residents' discount is excessive and should be reduced, which aligned with one response from small businesses highlighting that the discount does not discourage car use by holders. The Road Danger Reduction Forum said that it should be no more than 30 per cent of the charge. Free Now³⁴ said that discounts for residents should be on a sliding scale in reflection of the disparity in incomes across London.
- 5.4.39. LB Camden stated that the Mayor should investigate opportunities for limiting the impact on businesses and visitors to residents in the CC zone in the form of an exemption or refund scheme.

³⁴ Mobility app provider

Table 25: Detailed responses to Residents' Discount and online and app payment

	Issue/comment	Times raised	Our response
A	Support/agree with the residents' discount	834	These comments have been noted.
B	Should not be a residents' discount	177	<p>In 2003, when the CC scheme was introduced, a 90 per cent discount was provided in recognition that residents are unable to avoid the zone if they needed to drive. With the proposed introduction of charging at weekends, residents have fewer opportunities to travel by car without having to pay the charge. Re-opening the residents' discount is not expected to have a noticeable traffic impact as compared to the pre-pandemic scheme and provides a mitigation for residents.</p>
C	Other specific changes suggested to residents' discount (e.g. based on vehicle size, means-testing, residents' visitor passes)	149	<p>All eligible residents in the CCZ have been able to receive a 90 per cent discount from the Congestion Charge since its introduction in 2003. As part of the temporary changes, this was closed to new applicants on 1 August 2020. The proposal is to re-open this discount to new applicants. As stated in the consultation materials, there is not expected to be a noticeable traffic impact from this proposal as compared to the pre-pandemic scheme, as this reinstates arrangements that were in place previously (and which continued for registered residents after 1 August 2020). The rationale for this discount is that residents are unable to avoid the charge if they need to drive during charging hours. The eligibility criteria includes vehicle size but not income and it is not proposed to introduce any new criteria at this stage. Residents are still required to pay the Congestion Charge, albeit at a much reduced rate, which reinforces the message about the need to use constrained road space in central London effectively and to use other modes where possible. The 100 per cent CVD offers an incentive to residents to drive the very cleanest vehicles.</p> <p>It would not be appropriate to offer visitor passes since the objective of the scheme is to reduce traffic and congestion. The charge acts as a disincentive for those visiting the zone to do so by car and instead use more sustainable modes. Visitors, like other drivers, may be eligible for other discounts and exemptions.</p>

	Issue/comment	Times raised	Our response
D	Residents' discount should be higher	102	<p>In 2003, when the CC scheme was introduced, a 90 per cent discount was provided in recognition that residents are unable to avoid the charge if they needed to drive.</p> <p>A higher level discount would decrease or fully remove costs to residents. It is important that residents, like other drivers, are discouraged from making trips by motorised vehicles where possible. In a highly connected area with such tightly constrained road space this could lead to increased levels of car use by residents and undermine the benefits of the scheme.</p>
E	Residents' discount should be lower	86	<p>The 90 per cent residents' discount is set at a level which recognises the fact that residents in the zone who choose to drive are not in a position to avoid the charge zone while at the same time recognising residents' trips contribute to congestion. As the main aim of the CC scheme is to manage traffic and congestion by acting as a deterrent to driving in the zone during charging hours, it is considered appropriate that residents pay, albeit at a discounted rate.</p>
F	Boundary should be extended for residents' discount/unfair to those located just outside	73	<p>The substantive area of the current CCZ has been in place since the removal of the Western Extension in December 2010. There has been a smaller scale amendment to the boundary by the Old Street roundabout following changes to the road layout in the area. This was consulted on as part of the proposed changes to the CC scheme in 2018.³⁵</p> <p>The defined area of the CCZ was established to provide a clearly understood boundary focussing on some of the most congested roads in central London. The eligibility criteria for residents are based on those who have no alternative but to drive in the zone for any trip. This includes a small number of buffer zones where residents live outside the CCZ but have no choice but drive into it when leaving their home or only have access to controlled parking zones within the CCZ.</p> <p>Extending eligibility to a wider area would reduce the effectiveness of the charge to discourage unnecessary trips being made by car within the CCZ, where people living outside the current eligible zone have a choice to not drive in the CCZ. For trips heading out of London, those living in the eligible zone would have to pay a full charge without the discount, while those outside</p>

³⁵ The 2018 decision on the changes to the Congestion Charge can be found here - <https://www.london.gov.uk/decisions/md2397-amendments-congestion-charge-and-ultra-low-emission-zone>

	Issue/comment	Times raised	Our response
			<p>would not, and for trips into the zone, it is appropriate that they are charged to deter non-essential trips.</p> <p>The current level of resident discount for driving in the CCZ, and the eligibility criteria for those living in the zone is considered to be appropriate to deliver to the aims of the MTS.</p>
G	Oppose the removal of online and app pre-payment for residents	4	The removal of these payment options would leave the ability to pay by post, through the call centre and by Auto Pay. With less than one per cent of residents using these payment options, and with other options remaining available, it is not deemed to have a significant impact on holders of the residents' discount.
The following issues were raised by stakeholders in addition to the coded responses above.			
	Sliding scale should be applied to discount		Please see response in row C.

Pay next day

- 5.4.40. Forty-two per cent of people responding to the question on the effectiveness of the proposal to increase the delayed payment and extend the timeframe to make it thought it would be moderate or major. 48 per cent of people thought that it would have no or a minor effect. The responses to the issues and comments raised through the open questions are highlighted in Table 26.

Stakeholders

- 5.4.41. Westminster City Council and LB Islington supported this proposal; LB Camden also supported it and said the differential cost would encourage drivers to consider their journey and compare with public transport costs. LB Tower Hamlets said it would have a minor effect.
- 5.4.42. The LPHCA said that this would be further cost to an already struggling industry. The RHA said it would have no effect.

Table 26: Detailed responses to Pay Next Day

	Issue/comment	Times raised	Our response
A	Should be no extra charge for not paying on the same day (i.e. charge level should remain at £15 and not increase to £17.50)	94	<p>The delayed payment option provides the opportunity to pay a slightly higher charge for driving in the CCZ following their day of travel before being issued with a PCN. The purpose for having a delayed payment charge is to encourage compliance for people to pay on the day they have driven in the zone, supporting the overall objective of the Congestion Charge by applying the payment in advance or as part of the trip being made, as is the case with other TfL modes. The charge level for making a delayed payment is set at a level to encourage people to pay the standard charge for driving in the CCZ, but not to be at too high a rate to unfairly penalise someone who simply forgets to pay.</p> <p>Pre-pandemic, the delayed payment charge level was set at £14, £2.50 higher than the standard charge. The increase of £2.50 maintains the same financial difference as the pre-pandemic scheme while also having additional time to make the payment.</p> <p>Currently around 4.5 per cent³⁶ of charges paid are paid after the day of travel.</p>
B	Support increase in charge when paying up to three days later (£17.50)	43	We have noted these comments.
C	Should extend time to pay (e.g. greater than 3 days)	42	Pre-pandemic, customers had one charging day after driving in the CCZ to pay the charge, which provided an extended period of time if payment was not made on a Friday to pay on the subsequent Monday (where not a Bank Holiday). With the proposed introduction of charging days on Saturday, Sunday and Bank Holidays, the proposal is to extend the delayed payment window to three charging days to ensure that drivers have an equivalent amount of time to pay as compared to the pre-pandemic situation.

³⁶ Congestion Charge vehicle captures by type of charge payer, contraveners and exempt/100% discount customers, average for April to August 2021

			Extending the payment period to a longer timeframe than the proposed three days could potentially lead to a driver choosing to wait longer to make a payment and forgetting, and so receive a PCN, or result in a driver having numerous outstanding payments to make within the additional timeframe and forget to make a payment to cover one or more trips.
D	Support extending the time to pay to three days	35	We have noted these comments.
E	Suggest increasing the charge for not paying on the same day (e.g. £20)	11	Please see response in row A.
F	Should reduce time to pay (e.g. within 24 hours)	8	Please see response in row C.

Auto Pay and Fleet Auto Pay discount removal

- 5.4.43. 36 per cent of responses on the effectiveness the proposal for Auto Pay and Fleet Auto Pay thought it would have a moderate or major effect, while 50 per cent thought it would have no or only a minimal effect. Table 27 outlines the responses that were received on this proposal through the open question.

Stakeholders

- 5.4.44. Keith Prince AM, on behalf of the GLA Conservative Group, stated that the Auto Pay and Fleet Auto Pay discount should be retained. Logistics UK opposed its removal, as did LCCI and the BVRLA, who said it would lead to increased costs which would be passed on to customers and could make car clubs less attractive and potentially lead to more private vehicle ownership and use.
- 5.4.45. London Living Streets supported the proposal. Westminster City Council, LB Camden and LB Islington supported the proposal. Sian Berry AM supported the proposal.
- 5.4.46. Confederation of British Industry (CBI) opposed the removal of Auto Pay facility.
- 5.4.47. The Royal Academy of Arts highlighted that the abolition of the discount penalises those businesses who are set up to pay the charge on demand, with it removing the incentive to sign up and instead seems to be encouraging ad-hoc payments and to late payment income.
- 5.4.48. Small businesses opposed the removal of the Auto Pay and Fleet Auto Pay discount, with comments highlighting the additional expense this would result in alongside a further administrative burden. Addison Lee opposed the removal of Auto Pay and Fleet Auto Pay discount and said there was no evidence on the need to remove it.

Table 27: Detailed responses to Auto Pay and Fleet Auto Pay discount removal

	Issue/comment	Times raised	Our response
A	Should be a discount for Auto Pay / Fleet Auto Pay users	205	<p>Auto Pay and Fleet Auto Pay help make the process of paying the Congestion Charge easier and remove the risk of a PCN being issued for non-payment. By signing-up for either service, customers are automatically billed monthly for the number of charging days their vehicle(s) is/are used within the CCZ. Fleet Auto Pay is available to businesses with six or more vehicles, allowing all vehicles to be added to one account.</p> <p>Auto Pay for private drivers was introduced in 2011 following customer feedback and was introduced in the context of removing the discount for monthly and annual charges that had so far been available. Auto Pay is easier for users and reduces costs to TfL. To encourage people to sign-up for this method of payment following its introduction a £1 discount was given. The discount has been successful in encouraging people to sign-up for Auto Pay, with more than three quarters of customers paying in this way.</p> <p>Payment accounts for commercial vehicles pre-date the introduction of CC Auto Pay, with a Fleet Scheme available at the start of the CC scheme, later replaced by Fleet Auto Pay under which operators of ten or more vehicles received a £1 discount on the daily charge. This was introduced to offer a comparable discount to that available for drivers who chose to pay the charge monthly or annually. When CC Auto Pay was introduced, this approach was retained and also applied to Fleet Auto Pay (at the same time the minimum level for Fleet Auto Pay account was reduced from ten to six vehicles).</p> <p>With this proportion of Congestion Charge payments being made by Auto Pay or Fleet Auto Pay the discount was successful in encouraging people to sign-up and meeting its original objective.</p> <p>Removing the discount reinforces that access to road space in central London should not be discounted for those who would otherwise be liable to pay the full charge. Auto Pay and Fleet Auto Pay still provide an attractive proposition for drivers and fleet managers as it removes the administrative burden of having to pay the Congestion Charge everyday they drive or a fleet vehicle(s) is used in it, while also removing the risk of receiving a PCN for non-payment. Fleet</p>

	Issue/comment	Times raised	Our response
			Auto Pay also reduces the burden of having to utilise multiple accounts to manage payments for numerous vehicles travelling into the zone.
B	Support having no Auto Pay discount	40	These comments have been noted.

Reimbursements

- 5.4.49. Sixty-four per cent of respondents thought it was very or fairly important that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local authority workers, domiciliary care workers and charities during pandemics and epidemics in Greater London. Twenty-one per cent of respondents thought it was only slightly or not at all important. The main comments and issues raised by respondents in the open questions are outlined in Table 28.

Stakeholders

- 5.4.50. Caroline Pidgeon AM, Westminster City Council and LB Islington supported the reimbursement proposal.
- 5.4.51. London Ambulance Service supported continuing the reimbursement scheme or exemption for NHS workers accessing the congestion charge zone for work.
- 5.4.52. HCA Healthcare UK outlined their belief that privately funded patients who are eligible for NHS care, but have treatment in the independent sector either funded by health insurance or personally, should be able eligible for reimbursement.
- 5.4.53. Similarly, the Independent Healthcare Providers Network (IHPN) stated that it supported the proposal but that the NHS Reimbursement should be extended to independent providers' staff and patients. It also stated that the adapted reimbursement arrangements should not specifically refer to pandemics or epidemics but instead pertain to any patient where their health and safety would be at risk if they were unable to travel by road.

Table 28: Detailed responses to Reimbursements

	Issue/comment	Times raised	Our response
A	NHS staff reimbursement should apply in general	115	A general NHS staff reimbursement is not part of the current proposals. The current proposal seeks to adapt and retain a specific change to the NHS reimbursement scheme that was put in place in summer 2020 as part of the response to the COVID-19 pandemic. The NHS reimbursement scheme that existed prior to the pandemic remained in place when this temporary change was made, and would remain in place (in its current form) under the current proposals.
B	NHS patient reimbursement should apply in general	69	<p>The NHS staff and patient reimbursement is available for specific circumstances. For staff, these relate to journeys carrying certain equipment or notes. For patients, the criteria related to being clinically assessed as too vulnerable to travel by other means. It is not appropriate to extend either the NHS staff or patient reimbursement to all NHS-related trips. This would encompass a significant number of journeys and thereby undermine the CC scheme objectives.</p> <p>The temporary expansion of the reimbursement criteria for NHS staff was introduced to facilitate journeys, in particular journeys made to and from work, because NHS staff come into close contact on a regular basis with potentially significant numbers of people who may be infected with coronavirus or who may be more vulnerable to the impacts of infection. Pre-pandemic, the eligibility criteria for NHS staff covered a specific set of circumstances in which a reimbursement against the Congestion Charge could be claimed. The criteria mainly related to journeys which would be difficult to make other than by means of a car.</p> <p>For NHS patients, the temporary expansion of the reimbursement criteria was added to allow for patients who were clinically assessed as being at moderate or high risk of coronavirus to travel to appointments by car where they would not otherwise have met the eligibility criteria.</p> <p>Extending the proposed expanded reimbursement criteria to apply outside of extraordinary circumstances (for NHS staff) or during a pandemic or epidemic (for NHS patients) would defeat the objectives of the CC scheme when other transport options are available that present no risk to patient health. The pre-pandemic reimbursement arrangement, which will still be in place, will continue to provide reimbursements for staff and patients in normal circumstances.</p>

	Issue/comment	Times raised	Our response
			<p>In addition to the proposed introduction of the expanded criteria, the pre-pandemic reimbursement arrangements will still be in place and will continue to provide reimbursements for staff and patients in more normal circumstances.</p> <p>We will work to ensure that eligible people are aware of their ability to claim a reimbursement.</p>
C	Should be no reimbursement for NHS staff	49	<p>Prior to the COVID-19 pandemic, NHS staff were eligible for a reimbursement of the Congestion Charge when they were travelling for work purposes and had no option other than to use a car. Examples of this included where staff were carrying bulky, heavy or fragile equipment, or responding to an emergency call.</p> <p>The reimbursement criteria were temporarily relaxed so that they covered journeys made by NHS staff who were travelling to provide services in response to the COVID-19 pandemic even though they were not on call and were not entitled to reimbursement of their other travel costs as a condition of their employment contract. The expanded reimbursement arrangement was introduced because NHS staff come in close contact on a regular basis with potentially significant numbers of people who may be infected with coronavirus or who may be more vulnerable to the impacts of infection.</p> <p>Removing the reimbursement arrangement which applied pre-pandemic would result in additional costs for individuals, or the NHS if the staff member is entitled to reimbursement of their travel costs. The proposed changes to the reimbursement criteria which have been consulted are only likely to impact journeys made by NHS staff in an emergency or other extraordinary circumstances. This proposal is not expected to result in any significant traffic impacts.</p>
D	NHS staff/patients should be incentivised to use active travel modes or public transport	19	<p>The proposed changes to the reimbursement rules for NHS patients and staff would apply only in limited circumstances. For NHS patients, the proposed rule is to allow patients who have been clinically assessed as too vulnerable to infection to travel to appointments by public transport during an epidemic or pandemic prevalent in Greater London to claim a reimbursement. For NHS staff, the proposed changes would mainly impact journeys made by car for the purpose of allowing the staff member to provide services in response to an emergency or other extraordinary circumstances. We are not otherwise proposing changes to the patient or staff reimbursement</p>

	Issue/comment	Times raised	Our response
			<p>rules which applied pre-pandemic. These rules cover circumstances in which travelling by public transport is not a feasible alternative to travelling by car.</p> <p>NHS staff and patients are liable for payment of the charge in all other circumstances unless they are eligible for another discount or exemption.</p> <p>Central London is very accessible by public transport and for people walking and cycling, with several improvements made to make it easier for people to travel by alternatives to the car. NHS staff and patients are able to benefit from this. Wider and ongoing incentive and information schemes will continue to make people aware of the alternative options available for them to travel to/from and in central London.</p>
E	Should be no reimbursement for NHS patients	12	<p>Prior to the pandemic, NHS patients were eligible for a reimbursement of the Congestion Charge when they were clinically assessed as being too ill, weak or disabled to travel to an appointment by public transport and have a compromised immune system; require regular therapy or assessments; need regular surgical intervention. The reimbursement criteria were temporarily relaxed to include NHS patients travelling to and from an NHS appointment who are clinically assessed as being at moderate or high risk of coronavirus.</p> <p>Removing the reimbursement arrangement which applied pre-pandemic would result in additional costs for individuals and the NHS or place them at greater risk when travelling by public transport if they had been clinically assessed as being too ill, weak, or disabled to do so. The proposed changes to the reimbursement criteria which have been consulted will only impact journeys made by vulnerable NHS patients in an epidemic or pandemic prevalent in Greater London. This proposal is not expected to result in any significant traffic impacts.</p>
The following issues were raised by stakeholders in addition to the coded responses above.			
	Private healthcare patients / staff should be eligible for the reimbursement		<p>An NHS reimbursement arrangement has been in place since the implementation of the CC scheme in 2003. It was developed following consultation with the NHS, patient groups and the public. It reflects the fact that NHS treatment is universal and free at the point of delivery and ensures that the Congestion Charge does not act as a barrier to receiving this care. The NHS has statutory duties to reduce health inequalities and inequalities between patients with respect to their ability to access health services. The CC scheme reimbursement arrangement assists the</p>

	Issue/comment	Times raised	Our response
			<p>NHS to discharge its duties and ensures that the NHS is not out of pocket when reimbursing travel costs.</p> <p>The patient reimbursement arrangement is not available for patients travelling for the purpose of receiving private health care as the providers of these services do not have the same obligations as the NHS in terms of reducing inequalities in health care access.</p> <p>We recognise the distress that poor health can cause. Many patients receiving treatment at private healthcare facilities are treated under the auspices of the NHS and are, therefore, eligible for the NHS patient reimbursement scheme. Patients who choose to receive private healthcare often fund their treatment through private health insurance schemes, which may also fund transport arrangements.</p> <p>It is important to highlight that we do not directly reimburse patients but the relevant NHS trust who reimburse eligible patients. It is open to private healthcare providers to administer similar schemes for their patients, but it is not proposed that TfL would reimburse private healthcare companies or insurance providers.</p>

5.5. Comments on alternatives and mitigations

- 5.5.1. This section provides a summary of the comments that were received proposing other alternative approaches or mitigations that could be made through the proposals.

Stakeholders

- 5.5.2. Several respondents stated that there needed to be a more holistic and wide-ranging approach to Road User Charging (RUC) in London. Caroline Pidgeon AM stated that it was time to move to a more sophisticated form of RUC that considered distance travelled, emissions and local demand. Sian Berry AM made similar comments, calling for 'smart charging' based on distance, emissions and congestion. London Living Streets made similar comments, referencing the recent Centre for London report³⁷ advocating a smart London-wide charging scheme. London TravelWatch also supported such an approach, stating that it could more fairly allocate the external costs of vehicle use and support bus journey times and walking and cycling; it would also have benefits in reducing carbon and road traffic casualties. London Chamber of Commerce and Industry (LCCI) also highlighted the need for a discussion around road user charging in the capital, and that consideration must be given to a more streamlined system.
- 5.5.3. The City of London called for TfL and the Mayor to set out a timetable for this to happen, noting that the current contracts for running RUC in London expire in 2026. LB Islington said that it was keen to work with TfL and its neighbouring boroughs to develop an expanded charging zone which could take into account other factors such as emissions. LCCI noted the range of RUC schemes in London and asked for a more streamlined approach in future.
- 5.5.4. Heart of London Business Alliance (HOLBA) said that new mechanisms and technologies for charging – which do not impact more on the West End than other areas of London – should be considered. The London Forum of Civic and Amenity Societies called for more sophisticated road pricing that could be taken into account distance travelled and other factors; it also called up on the Mayor to use on-street parking policy as a way to tackle congestion.
- 5.5.5. The RAC said that managing congestion wasn't simply about reducing traffic and that while it supported measures to support cycling, consideration should be given to their impact on vehicles on the road. The London Private Hire Car Association (LPHCA) said that addressing the issue of virtual ranking by better enforcement would solve the problem of congestion.
- 5.5.6. East Dulwich Residents Association said that the proposals would make little difference and that effort should be focused on making public transport safer, cheaper and more attractive.

³⁷ <https://www.centreforlondon.org/publication/road-user-charging/>

- 5.5.7. GMB Union said that alternatives such as charging more for parking or higher Congestion Charge should be used instead.
- 5.5.8. Several comments were made about the availability of the Night Tube. Caroline Pidgeon AM; Borough & Bankside Ward Southwark councillors; Heart of London Business Alliance (HOLBA); Central District Alliance Business Improvement District (CDA BID) said that these measures must be accompanied by the re-introduction of the Night Tube. Borough and Bankside Ward Southwark Councillors also highlighted that the proposed changes should be complimented by a campaign to encourage people to use public transport or more sustainable methods of travel into the CCZ.
- 5.5.9. Caroline Pidgeon AM highlighted that it is important that improvements are made to the reliability of bus services to make them a better alternative to many car journeys.
- 5.5.10. While not a broad view across small businesses, some expressed views that it would be more 'honest' to block access to the CCZ rather than making it reliant on how much people were able to pay, by excluding all traffic from central London. Alternatively, the scheme should return to its pre-pandemic state as the proposed changes will not mitigate against congestion and do not make the CCZ more accessible. One business also commented that there needs to be a quicker roll-out of charging points for electric vehicles, while the pricing of parking was also raised as an additional cost that businesses had to face.

Table 29: Detailed responses to Alternatives and Mitigations

	Issue/comment	Times raised	Our response
A	Needs to be more encouragement/ investment in public transport (e.g. cheaper, more frequent etc)	496	<p>The aim of the MTS is for 80 per cent of all journeys to be made by walking, cycling or public transport by 2041. However, this is higher for trips within central London (95 per cent) and between central London and inner / outer London (99 per cent). To deliver this, several plans have been put into place to make travelling by these modes more accessible, convenient, safe, and reliable, and investment will continue to be made to deliver this. Recent examples of improvement include the opening of the Northern line extension and the addition of further step-free access to stations across the network;³⁸ further improvements in the future include the Elizabeth line and the completion of the Bank Station Upgrade.</p> <p>Improving air quality and reducing carbon emissions are core components of the MTS, with the strategy setting a timeline for zero emission road transport to be delivered in London. Since the publication of the MTS in 2018, the Mayor has outlined his aims for London to be a zero-carbon city by 2030.³⁹ Delivering this will require decarbonisation of the transport network, including measures to reduce traffic and, for those who need to drive, to support the uptake of electric and other low/zero emission vehicles.</p> <p>Revenue raised from the Congestion Charge must be re-invested in delivering the MTS and will thus further improve London's sustainable transport system.</p>
B	Other suggestions to reduce congestion/ pollution, including action to encourage electric vehicles, vehicle	393	<p>The CC scheme is one of the many interventions being used to address congestion and reduce traffic by encouraging an even greater uptake of sustainable modes in central London and it will continue to be important to use a range of approaches. These include making street environments more attractive for the space-efficient modes of walking, cycling and buses, and making public transport more accessible. Another example is the successful Lane Rental Scheme which aims to reduce disruption by charging utility companies a daily fee for digging up the busiest sections of London's roads and pavements at the busiest times. The funding is</p>

³⁸ More than 30 per cent of the Tube network is now step-free, with the number of step-free access stations totalling more than 200

³⁹ In 2020, the Mayor of London, Sadiq Khan, committed to set a target for carbon neutrality by 2030 which was reconfirmed by the Mayor's 2021 Manifesto

	Issue/comment	Times raised	Our response
	bans and action on vehicle idling		<p>then available to help find new ways of making London's roads more efficient, for example by investing in technology which reduces the need to dig up the road to do repairs in future.⁴⁰</p> <p>With regard to bans and restrictions on certain types of vehicles, some boroughs do have restrictions in place at certain times of day as part of School Streets or Low Traffic Neighbourhoods. While these can be effective in reducing pollution and supporting active travel, and further schemes may be brought forward (and many temporary schemes are now subject to consultation on becoming permanent) further restrictions are not part of these proposals which have road user charging, specifically the CC scheme, as their focus.</p> <p>As set out in Proposal 27 of the MTS, the Mayor's Air Quality Fund (MAQF) has been supporting local initiatives to tackle air quality hotspots, including issues caused by engine idling. Idling Action London, led by City of London and LB Camden, is supported by MAQF and is a behavioural change programme across London which includes behaviour change education and supporting enforcement of idling regulations.</p> <p>The CC scheme has a positive effect in reducing pollutant emissions from road transport (both as a deterrent to driving and because the CVD incentivizes the use of zero emission vehicles) but it is also important to note the impact of the ULEZ, which on 25 October 2021 expanded to the North and South Circular roads. The ULEZ expansion, alongside tighter London-wide LEZ standards for heavy vehicles introduced in March 2021, are expected to reduce nitrogen oxides (NOx) emissions from road transport by 30 per cent across London in 2021. Another key approach in tackling pollution is switching to low and zero emission vehicles. London has the largest zero emission bus fleet in western Europe, has put in place taxi and private hire licensing standards to move these fleets to zero emission capable vehicles and contains a third of all the public vehicle charging points in the UK. Recently we published the Draft Electric Vehicle Infrastructure Strategy⁴¹ which sets out a potential route to</p>

⁴⁰ <https://tfl.gov.uk/info-for/urban-planning-and-construction/our-land-and-infrastructure/lane-rental-scheme?cid=lanerental>

⁴¹ <https://luc.content.tfl.gov.uk/londons-2030-electric-vehicle-ev-infrastructure-strategy-exec-summary.pdf>

	Issue/comment	Times raised	Our response
			delivering further infrastructure in the years to 2030, when new petrol and diesel cars and vans will be phased out.
C	Needs to be more encouragement/ investment in active travel (walking, cycling, infrastructure, pedestrianisation)	244	See the response to row A.
D	Needs to be more enforcement of poor cyclist behaviour	132	Working with a variety of partners, regular enforcement activity takes place across London's road network, and which includes the enforcement of poor behaviour by people cycling. In addition, our Vision Zero Action Plan sets out how we support and improve safe behaviours of all road users.
E	Request TfL to explore wider road user charging (RUC) schemes	89	Proposal 21 in the MTS outlines that the Mayor and TfL will investigate proposals for the next generation of road user charging systems.
F	Need more parking areas/spaces	57	<p>A wide range of parking is currently available for people driving into central London, or more widely across Greater London. This includes dedicated, paid for provision that can be found in privately owned car parks and on-street, alongside free parking that can also be found on-street. Apart from some parking located alongside the TLRN, on-street parking is a matter for the London Boroughs while private operators are responsible for their own sites.</p> <p>Due to the high demand for parking a car or van in central London, it is charged at a price to reflect the balance between its supply and demand.</p> <p>Providing cheaper or more parking for cars or vans would be counter to the aim of the MTS.</p>
G	Make parking cheaper	39	
H	Need less parking areas/spaces	15	
			Proposal 103 of the MTS sets out that we will explore and monitor the relationship between access to kerb space, including car parking, and the level of demand for all forms of car use to inform assessment of how demand management measures should evolve over time. Working with Boroughs, alongside work they undertake themselves through their parking

	Issue/comment	Times raised	Our response
			management, reviews are undertaken of the approach to parking, but our role remains limited in terms of direct management of on-street parking provision. TfL does however actively manage demand for parking at its stations.
I	Make parking more expensive	13	Please see row F.
J	Stop/limit commercial vehicles entering during the day	9	As set out in row B, there are restrictions in place at certain locations and times on vehicle entry in London. However it would not be appropriate to prevent or limit all commercial vehicles from entering the CCZ. The Congestion Charge is set at a level to act as a disincentive for all non-essential motorised vehicles to drive in or through the CCZ. It also acts as an incentive to consolidate freight trips. Banning freight and servicing vehicles would penalise vehicles that are more likely to be undertaking an essential journey which is harder to switch to other modes of transport and would have a significant impact on central London's economy. Additional measures are in place to encourage the re-timing of freight journeys to quieter times ⁴² and the LEZ and ULEZ encourage commercial vehicle operators to switch to lower emitting vehicles.
The following issues were raised by stakeholders in addition to the coded responses above.			
	Measures must be accompanied by the re-introduction of Night Tube		On 14 October we announced the gradual re-introduction of the Night Tube, with two lines planned to start back in service from November 2021. Over 100 Night Bus routes continue to operate in London.
	Addressing the problem of virtual ranking (where PHVs circulate or queue looking for passengers) would solve congestion		All PHV journeys must be booked with a licensed PHV operator and it is illegal for PHV drivers to tout, ply for hire or take a passenger who has not booked with a PHV operator. PHV drivers touting, plying for hire or other illegal taxi or PHV related activity should be reported to TfL so as we can investigate this and where appropriate take action. Reports can be sent to us quickly and easily by using our online form.
	Impact of cycling measures on traffic		Cars take up a lot of space relative to the number of people they can move around, and reliance on cars has made London's streets some of the most congested in the world. This

⁴² <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-efficiently/retiming-deliveries>

	Issue/comment	Times raised	Our response
			<p>has huge impacts on Londoners – causing pollution, making streets unpleasant places to be and delaying public transport and essential car and motorcycle journeys. It also reduces the efficiency of the freight and commercial journeys that keep London running.</p> <p>The success of London's future transport system relies on reducing non-essential car use. Pre-pandemic, one quarter of car trips could potentially be walked, and two thirds could potentially be cycled. Making alternative transport options accessible and appealing to all Londoners is therefore key to encouraging people to change the way they travel and reducing car dependency.</p> <p>This means improving street environments for more space efficient modes of transport to make walking and cycling the most attractive options for short journeys and providing more, and better, services to make public transport the most attractive option for longer ones. This approach will reduce health and economic inequalities by providing low-cost, accessible travel options for Londoners who are currently reliant on cars – or who cannot get around at all.</p>
	Offer key workers free or discounted public transport / bike hire		<p>TfL makes efforts to keep fares as low as possible and to help customers choose the best fare for their journey (see https://tfl.gov.uk/fares/ for an online fare finder).</p> <p>Fares decisions are taken annually by the Mayor who, following five years of fare freezes, increased overall fares from 1 March 2021 by 2.6 per cent (RPI plus one per cent). This was a condition of the funding agreement with Government in October 2020 and is in line with National Rail increases. Within the rise, some fares remained frozen – including some single pay as you go Tube, DLR, London Overground and TfL Rail fares.</p> <p>For registered customers there is a pay as you go cap on daily journeys paid for by contactless or Oyster card. TfL also offers a range of concessionary fares for certain groups (please see: https://tfl.gov.uk/fares/free-and-discounted-travel?intcmp=54647).</p> <p>The Santander cycle hire scheme is £2 per day for unlimited journeys up to 30 minutes in duration. There is also an annual membership option available whereby you can use the</p>

	Issue/comment	Times raised	Our response
			<p>cycles year-round for £90 (25p per day). Free 24-hour access to Santander Cycles for NHS workers, including all journeys under 30 minutes, is also available.</p> <p>However it is not proposed to offer free or discounted travel to key workers. Such a discount would be very difficult to define and justify, and would inevitably lead to calls for further discounts for other groups.</p>

5.6. Other comments relating to the Congestion Charge

- 5.6.1. This section provides responses to comments that were raised regarding other issues that were related to the Congestion Charge. These are broken down across other exemptions that were commented on, other suggested discounts, travel into the CCZ, the time to implement the changes, and a range of other comments that have not been categorised into any broader theme.

Discounts and exemptions

Stakeholders

- 5.6.2. The Federation of Small Businesses (FSB) stated that a discount or exemption from weekend charging should be available to market traders and construction-related businesses, and called for TfL to work with local authorities on a local business weekend exemption scheme.
- 5.6.3. GMB Union said that PHVs should either not pay the charge or the charging hours should end at 18:00 for them. It said that commercial patient transport services must pay the charge as they are similar to PHVs in the service they provide. It called for a small levy on all PHV trips instead of the charge.
- 5.6.4. Heart of London Business Alliance (HOLBA) said there were few opportunities to avoid the charge and that the criteria for the Cleaner Vehicle Discount could only be met by more expensive vehicles.
- 5.6.5. CBI said that businesses that carry out emergency infrastructure repairs in London should be considered for discounts or exclusions. In addition, there should be increased discounts for freight operators, with increased charges levied against non-essential vehicles. The RHA stated that there should be an exemption for freight and delivery vehicles to help London recover and that any new charges would be passed on to customers. The Brewery Logistics Group said there should be an exemption for freight vehicles as these are always essential trips.
- 5.6.6. Medical Despatch questioned whether vehicles with ambulance vehicle taxation are still going to be exempt as there was no mention of them.
- 5.6.7. Through the responses, some small businesses highlighted the need for reimbursement, discount or exemptions for those either based in or those that need to travel into the CCZ for work, or to be based on vehicle type, e.g. HGVs, and that this should be at least at the same rate as residents receive.
- 5.6.8. Caroline Pidgeon AM stated that a weekend and Bank Holiday discount for car clubs should be considered, on the grounds that these reduce car ownership and that users also use public transport. Keith Prince AM on behalf of the GLA Conservative Group also called for a residents' discount for car clubs as these reduce car ownership.

- 5.6.9. The BVRLA stated that there should be a car club exemption because all car club cars, and nearly all vans, are ULEZ compliant and that car clubs lead to reduced vehicle trips, reduced emissions and that members also make a high proportion of public transport trips.
- 5.6.10. Addison Lee said that the Cleaner Vehicle Discount for electric vehicles should remain in place until 2030.
- 5.6.11. Bloomsbury Air stated that they believed support should be considered for those in social housing or with low incomes given the levels of poverty that can be seen within the CCZ.

Table 30: Detailed responses to discounts and exemptions

	Issue/comment	Times raised	Our response
A	Should be a discount for other specified users/groups	154	Since its introduction in 2003, the CC scheme has been in place to disincentivise non-essential motorised trips from being made in central London. Throughout this period a number of discounts have been available for people meeting specific eligibility criteria, which are broadly targeted at people or services who have less choice about whether to drive in the zone, are performing a public service or incentivise the use of cleaner vehicles to improve air quality, for example.
B	Charges should be higher for other specified vehicle types, including commercial vehicles, higher emission vehicles, vans and lorries (incentivise upgrade to cleaner commercial vehicles)	115	The Congestion Charge is set at a level to act as a disincentive for all non-essential motorised vehicles to drive in or through the CCZ. This is to enable the CC scheme to meet its goal of reducing traffic and congestion and delivering the aims of the MTS. Setting a lower charge for some vehicle types would undermine the objectives of the scheme. Setting a higher charge for certain vehicle types such as freight and servicing vehicles would penalise vehicles that are more likely to be undertaking an essential journey which is harder to switch. The Low Emission Zone and the expanded Ultra Low Emission Zone are emissions-based schemes, aimed at ensuring people switch to cleaner vehicles. Those not meeting the required emissions standards are liable to pay a £12.50 daily charge to drive in the ULEZ.
C	Should be a discount for those with informal family care arrangements	111	Please see row A above. This type of discount would be extremely complex to define and enforce. Other discounts and exemptions may help mitigate impacts on those providing informal care arrangements.
D	Should be a discount for those on lower incomes/financially struggling	111	Please see row A above. Most trips (around 90 per cent) in central London are made by public transport or active modes, and car ownership is only around 40 per cent for households in inner London (and only 56 per cent for London overall). In addition, car ownership is correlated with income in all parts of London (in inner London, for example, 80 per cent of households with under £10k annual income – and 70 per cent with under £20k – do not have access to a car). This means that many people on low incomes would not benefit from such a discount because they are more likely to use public transport or walk and cycle.

	Issue/comment	Times raised	Our response
E	Support/agree with battery electric vehicles/hydrogen fuel cell vehicles not being charged/being exempt from charges	101	We have noted these comments.
F	Oppose PHVs being charged/should be exempt from charges	84	Following consultation, the exemption for PHVs was removed in April 2019 to ensure that the CC scheme continued to be effective. Taxis remain exempt from the Congestion Charge. PHVs registered as being wheelchair accessible are also eligible for an exemption from the charge, while drivers and vehicles are also eligible for other discounts where they meet the criteria. Detailed information on the rationale for this can be found here: https://tfl.gov.uk/corporate/publications-and-reports/congestion-charge
G	Support there being a discount for Blue Badge holders	81	We have noted this response. There is no plan to remove the 100 per cent discount for registered Blue Badge holders.
H	Should be no charge/exemptions for other specified vehicle types such as hybrid vehicles	74	On 25 October 2021 we tightened the eligibility criteria for the CVD so only battery electric or hydrogen fuel cell vehicles are eligible for the discount. This is considered appropriate given the development of vehicle technology and availability in recent years. It is important to keep tightening the standards in order to maintain the effect of the CC scheme. From December 2025, the CVD will be discontinued. From this date, all vehicle owners, unless in receipt of another discount or exemption, will need to pay to enter the Congestion Charge zone during charging hours.
I	Should be a discount for key workers	67	As described in row A, the main objective of the CC scheme, the number of discounts and exemptions available has been limited to specific criteria in order to not undermine the overall objective of the scheme. There is no proposal to offer a key worker discount. This would potentially encompass a very large number of people and thereby undermine the CC scheme. As already described in this report, central London is very well-connected in terms of public transport including

	Issue/comment	Times raised	Our response
			night buses, and from November, the planned gradual re-introduction of the Night Tube. Additionally, such a discount would be very difficult to define and enforce.
J	Should be a discount for other disabled people (i.e. in addition to blue badge holders)	61	Please see row B above. In addition to the Blue Badge discount, vehicles in the disabled tax class are exempt from the Congestion Charge.
K	Charges should be lower for other specified vehicle types including newer and commercial vehicles	60	See response in row H and row B.
L	Should be a discount for emergency services workers (e.g. police)	44	Please see rows A and I above.
M	Delivery/freight/servicing vehicles should not be charged/should be exempt from charges	41	<p>It is recognised that the services performed by this sector are an essential part of London's economy, as well as being part of the post-pandemic recovery. It is also recognised that there are currently a number of factors which adversely affect this sector, beyond any impact that the CC scheme has. There has never been a discount or exemption based on freight or servicing, although some vehicles may be eligible for the CVD. A discount or exemption of this type would be likely to undermine the traffic and congestion benefits of the scheme. It should also be noted that the MTS sets a target for a reduction of freight traffic in the AM peak in central London. An exemption for freight and servicing vehicles would therefore not be appropriate.</p> <p>The IIA commissioned for the proposals assessed the likely impacts on London's economy as being neutral overall, while noting that there could be minor negative and positive impacts on specific sectors, and that it is not expected that London's supply chains would be affected.</p>

	Issue/comment	Times raised	Our response
			Reliable journey times and reduced traffic are particularly important to the freight, servicing and delivery sectors and it is expected that these proposals would lead to benefits in these areas. Both the MTS and the Freight and Servicing Action Plan set out a range of policies to support the sector in achieving clean, safe and efficient trips in London.
N	Delivery/freight/servicing vehicles should be charged more/higher amount	37	The Congestion Charge is set at a level to act as a disincentive for all non-essential motorised vehicles to drive in or through the CCZ. This is to enable the CC scheme to meet its goal of reducing congestion and delivering the aims of the MTS. Setting a higher charge for certain vehicle types such as freight and servicing vehicles would place an additional charge on to vehicles that are more likely to be undertaking an essential journey which is harder to switch.
O	Oppose taxis (black cabs) not being charged/should not be exempt from charges	37	There is no proposal to remove the taxi exemption from the Congestion Charge. One key distinction between taxis and PHVs, which was central to the original policy proposal to exempt taxis but not PHVs, is that taxis are legally required to be wheelchair accessible. In addition to wheelchair accessibility, taxis (but not PHVs) are required by the Conditions of Fitness which are a licensing requirement to provide a range of other accessibility features, which make them better placed to meet the needs of passengers with a range of accessibility needs and provide a door-to-door service in the CCZ. There are also other differences between taxis (black cabs) and PHVs, which make it justifiable to maintain the exemption for taxis. These differences include compellability, route requirements and fares policy.
P	Should be a discount for elderly people	31	Please see row A above. The IIA undertaken for the proposals (described in section 2.5 above) assessed the potential impacts on older people and identified potential positive and negative impacts, and did not suggest a discount for this group. Older people in London are eligible for free travel on our services using the Freedom Pass. The discounts and exemptions available – Blue Badge, disabled vehicle tax class and the proposed adaptation and retention of the NHS and care workers reimbursement would have benefits for some older people.

	Issue/comment	Times raised	Our response
Q	Should be no discounts for anyone	23	As set out above, it is important to balance the need for some discounts and exemptions to mitigate the impacts of the scheme with the overall scheme objectives of managing traffic and congestion in London.
R	Taxis/PHVs (cannot determine which) should not be charged/should be exempt from charges	22	Please see response in row F.
S	Taxis/PHVs (cannot determine which) should be charged/should not be exempt from charges	22	Please see response in row F.
T	Oppose/disagree with battery electric vehicles/hydrogen fuel cell vehicles not being charged/being exempt from charges	20	Battery electric and hydrogen fuel celled vehicles have a 100 per cent discount from the Congestion Charge to support uptake of these vehicles, in line with the MTS. This discount is provided through the CVD, which has been updated over time to ensure that it remains effective in improving air quality in London. The CVD recently changed on 25 October 2021 so that only battery electric or hydrogen fuel cell vehicles are eligible. Up to this date it also included vehicles that met Euro 6 standards, that emitted no more than 75g/km of CO ₂ and have a minimum of 20 mile zero emission capable range. The discount is due to be discontinued at the end of 2025. By 2025 it is expected that the cleaner vehicle market will have developed and more vehicles will be available, meaning that the discount would undermine the congestion reduction objective of the scheme if it continued. Future incentives for the uptake of zero emission vehicles will be considered to support the ambition of the MTS for zero emission road transport by 2050 ⁴³ including the expansion of ULEZ from 25 October 2021.
U	Support taxis (black cabs) not being charged/being exempt from charges	20	Please see response in row F.

⁴³ Since the publication of the MTS in 2018, the Mayor has outlined his aims for London to be a zero-carbon city by 2030

	Issue/comment	Times raised	Our response
V	Support PHVs being charged/should not be exempt from charges	19	Please see response in row F.
W	Should be a discount for smaller businesses	16	While it is recognised that for some trips it is necessary to use a vehicle, it is important not to undermine the aims of the CC scheme and incentivise businesses to reduce and re-time trips and switch to other modes where possible. The MTS has a target of reducing freight trips in central London by 10-15 per cent in the AM peak. Businesses benefit from reduced congestion and more reliable journey times as a consequence of the CC scheme.
X	PHVs should be charged less/lower amount	16	Please see response in row F.
Y	Should be a discount for businesses (general comments)	15	Please see answer in row W.
Z	Delivery/freight/servicing vehicles should be charged less/lower amount	13	Please see response in row M.
AA	Taxis/PHVs (cannot determine which) should be charged more/higher amount	9	Please see response in row F.
AB	Should be a discount for vulnerable people (not specified whether referring to disabled or elderly people)	9	Please see answer in rows A, J and P.
AC	Should be a discount for vehicle sharing i.e. car / van sharing clubs	9	Please see row A. While vehicle-sharing could help to reduce the number of vehicle trips, these vehicles nevertheless continue to contribute to congestion; and a discount may also disincentivise people to use more sustainable modes.

	Issue/comment	Times raised	Our response
			Furthermore, respondents have raised the point that car clubs do not tend to pass the congestion charge on to their customers. A discount would therefore not act as an incentive to choose a car club over a private vehicle.
AD	PHVs should be charged more/higher amount	8	Please see response in row F.
AE	Taxis/PHVs (cannot determine which) should be charged less/lower amount	7	Please see response in row F.
AF	Should be a discount for my business	3	Please see the response in row W.
The following issues were raised by stakeholders in addition to the coded responses above.			
	Discount / exemption for market traders		<p>Since its introduction in 2003, the CC scheme has been in place to disincentivise non-essential motorised trips from being made through central London.</p> <p>Throughout this period a number of discounts have been available for people meeting specific eligibility criteria, which are broadly targeted at people or services who have no choice but to drive in the zone, are performing a particular service in the zone to help manage congestion and incentivise the use of cleaner vehicles to improve air quality.</p>
	Discount / exemption for construction-related businesses		
	Discount / exemption for couriers / food delivery workers		
			<p>The number of discounts and exemptions available has been limited to specific criteria in order to not undermine the overall objective of the scheme. There is no proposal to offer a market trader discount. Such a discount has been considered in the past and was rejected for a number of reasons including the difficulty of defining such a discount; the lack of specific reasons to offer a discount to this group compared to other commercial activities and the likelihood of challenge from further trades on that basis.</p> <p>As already described in this report, central London is very well-connected in terms of public transport including night buses, and from November, the planned</p>

	Issue/comment	Times raised	Our response
			gradual re-introduction of the Night Tube, meaning that there are a range of alternatives to driving.
	Discount / exemption for emergency infrastructure repair vehicles		<p>As set out above, it is important to limit the numbers of discounts and exemptions in order not to undermine the overall objective of the CC scheme. Emergency infrastructure repair vehicles may qualify for an exemption if they meet one of the following criteria:</p> <ul style="list-style-type: none"> • A vehicle used for an operational function of any of the London boroughs covered by the CCZ • An emergency response unit of TfL or any London borough used for the purpose of responding to an emergency • Recovery and breakdown vehicles <p>Full details on the eligibility can be found on our website⁴⁴ and in the Scheme Order.⁴⁵</p> <p>It would not be appropriate to widen the eligibility criteria in order not to undermine the objectives of the CC scheme.</p>
	Commercial patient services should not be exempt		The current NHS Reimbursement arrangements for patients and staff are not available to private providers.
	Discount/exemption for businesses at weekends		Please see row A above. Offering discounts to businesses at weekends would not be justifiable in terms of meeting the CC scheme objectives and would lead to calls for other discounts from other groups.
	Commercial patient transport services must pay		Unless they are eligible for another discount or exemption (for example the 9+ seater vehicle 100 per cent discount), these services would need to pay the charge.
	Use a small levy on all PHV trips rather than		Following consultation, the exemption for PHVs was removed in April 2019 to ensure that the Congestion Charge continued to be effective. Taxis remain

⁴⁴ <https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions>

⁴⁵ <https://content.tfl.gov.uk/consolidated-scheme-order-july-2020.pdf>

	Issue/comment	Times raised	Our response
	apply the Congestion charge		<p>exempt from the Congestion Charge. PHVs registered as being wheelchair accessible are also eligible for an exemption from the charge, while drivers and vehicles are also eligible for other discounts where they meet the criteria. Detailed information on the rationale for this can be found here: https://consultations.tfl.gov.uk/policy/private-hire-charge-exemption/user_uploads/congestion-charge-changes-consultation-report-to-mayor.pdf</p> <p>Applying a small levy on all PHV trips – even if this were feasible – would not act as a deterrent to driving in the CCZ and would therefore not be in line with the CC scheme objectives.</p>
	Medical ambulance exemption		<p>Emergency service vehicles, such as ambulances and fire engines, which have a taxation class of 'ambulance' or 'fire engine' on the date of travel and NHS vehicles that are exempt from vehicle tax both have an exemption from the Congestion Charge. The proposals do not affect this.</p>
	Discount for churchgoers / extend reimbursement scheme to churches and their charitable activities		<p>It is not considered appropriate to develop a discount or exemption specifically for churchgoers, or people attending other types of religious service. As noted above, there are ways to mitigate the impacts identified in the IIA and by stakeholders during the consultation. It may be possible for people attending services, or places of worship to change the time of services / the services they attend and where this is not possible for religious or other community services, there are many other ways of accessing places of worship in the zone. To introduce a discount would undermine the objectives of the scheme.</p> <p>Pre-pandemic, reimbursements were available for NHS staff and NHS patients in respect of certain journeys. In summer 2020 temporary changes were put in place to extend this in response to the COVID-19 pandemic and to create new reimbursements for certain local authority, charity, domiciliary care or care home workers. While the current proposal (as described in section 2.3) extends the reimbursement criteria beyond the COVID-19 pandemic to pandemics and epidemics more generally, the reimbursement arrangements (and the pre-</p>

	Issue/comment	Times raised	Our response
			<p>pandemic NHS staff and patient reimbursement scheme which will remain in place) retain their focus on very specific, health-related criteria and essential trips in exceptional or extraordinary circumstances rather than for more general activities such as attending a religious service. A reimbursement for church-related charity activities may meet this remit when the services are provided directly in response to a pandemic or epidemic but not otherwise. The reimbursement (unlike discounts and exemptions) is not administered directly by TfL but is undertaken by NHS bodies, local authorities and charities (TfL in turn reimburses them).</p> <p>Extending the scope of the reimbursements further would risk undermining the objectives of the CC scheme and would almost certainly lead to calls for further categories to be added. Even if it were desirable to provide such a reimbursement, the eligibility criteria would be extremely complex to define and enforce, and individual churches would need to have the capacity to assess, process and pay reimbursements.</p> <p>As set out in Table 18, other discounts and exemptions may help mitigate impacts on those undertaking these activities, such as the 9+ seat vehicle 100% discount or the Blue Badge discount. Additionally the CCZ is very well-provided for in terms of public transport and concessionary fares are available for younger and older people.</p>

The CCZ

Stakeholders

- 5.6.12. The London Forum of Civic and Amenity Societies called for the CCZ to be expanded so that the area which used to be the Western Extension would be re-incorporated. This would reduce trips and raise revenue. Camden Cycling Campaign said consideration should be given to expanding the zone.
- 5.6.13. Among the responses from the faith organisations the comment that special events also have an impact on traffic in central London was made.

Table 31: Detailed responses to the CCZ

	Issue/comment	Times raised	Our response
A	Should extend the Congestion Charging zone/increase the boundary; charge more in location with better public transport connections	121	<p>The original rationale for the boundary of the CCZ is that it is the area in central London that suffers most from persistent and high levels of congestion. This remains the case and there are no plans to extend the CCZ at this time. As described in Chapter 1, MTS Proposal 20 sets out that we will keep London's road user charging schemes under review to ensure they continue to help meet the objectives of the MTS. There are no plans to reconsider the area covered by the CCZ at the current time.</p> <p>The CCZ has the highest levels of public transport accessibility in London, and is one of the best connected places in the world. This is reflected in the already high public transport mode share in central London. Prior to the pandemic, a 90 per cent sustainable mode share for trips made by London residents within central London had been achieved, with almost all remaining car trips potentially switchable to sustainable modes.</p>
B	Should have a way to check if you've been inside the zone/when you need to pay	70	<p>The technology currently used to operate and enforce the CC scheme does not allow for drivers to check if they have been in the CCZ after travel. There are no plans to introduce such a function in the near future, although Proposal 21 in the MTS commits us to investigating the next generation of road user charging, which could include different technology and functionality.</p> <p>People who would like the facility of only paying for times when they drive in the CCZ and the assurance of not having forgotten to pay the charge and potentially incurring a PCN, have the option to use Auto Pay. This is already the most popular option for paying the charge.</p>
C	Should reduce the size/boundary of the Congestion Charge zone	30	Please see response in row A.
D	The Congestion Charge zone should align	6	The ULEZ and the CC scheme have differing objectives which are relevant to their respective boundaries and sizes. The main aim of the ULEZ is to reduce harmful vehicle emissions in

	Issue/comment	Times raised	Our response
	with the zone for the ULEZ expansion (planned for Oct 2021)		<p>London, whereas the main aim of the CC scheme is to manage traffic and congestion in central London.</p> <p>On 25 October 2021 the ULEZ expanded in size, from being the same area as the CCZ to the North South Circulars (these boundary roads are not included in the ULEZ). ULEZ is expected to reduce nitrogen dioxide by around 30 per cent across London. The implementation of the ULEZ in central London in April 2019, and its subsequent expansion in October 2021, were subject to several public consultations, including on the size of the zone.</p> <p>It is not proposed to expand the CC scheme to match the expanded ULEZ boundaries.</p>
The following issues were raised by stakeholders in addition to the coded responses above.			
E	Special events also have an impact on traffic		Special events may from time to time impact on traffic and will be supported by appropriate traffic management and travel demand management measures.

Implementation timescales

Stakeholders

- 5.6.14. Keith Prince AM on behalf of the GLA Conservatives said that it was unacceptable that some of the proposals would not be implemented until February 2022. He contrasted this period with the short timeframe in which the temporary changes were implemented in 2020 and stated that having the extended charging hours in for Christmas this year would negatively affect the recovery of London's economy.
- 5.6.15. The New West End Company (NWECC) said that many were still reluctant to use public transport so the proposals should be delayed by 18-24 months.
- 5.6.16. Some small businesses stated that the changes should be postponed for periods between six and 48 months, or following recovery from the pandemic.

Table 32: Detailed responses to Implementation timescales

	Issue/comment	Times raised	Our response
A	Proposed changes should be implemented sooner	82	Subject to the Mayor's decision, the timetable for the proposed changes to come into effect is governed by several factors, meaning that they cannot be delivered in a quicker timeframe. This includes the need for analysis of the approximate 10,000 responses to the consultation, issues and comments to be considered, reporting for the Mayor to be finalised and time for the Mayor to make a decision based on the report, and then for the changes to be put into effect operationally. Depending on the type of changes, this may require changes to signage and back-office systems following the Mayoral decision to ensure the scheme operates legally and efficiently. As far as possible, the changes proposed would be introduced in the days immediately following the Mayor's decision, with the exception of the change to charging hours which requires more complex operational preparations including changes to signage and back-office functions. These changes are therefore due to come into effect on 21 February 2022, if confirmed.
B	Proposed changes should be delayed	23	The proposals have been developed to support the long-term aim of the MTS, and it is considered that they will also support the short to medium term challenges that persist as a result of the pandemic. Delaying implementation would delay the benefits the proposed changes are designed to deliver.

5.7. Consultation process

Stakeholders

- 5.7.1. A number of stakeholders considered that there was a lack of data or evidence to support the proposals. Stakeholders mentioning this were Caroline Pidgeon AM, Freedom for Drivers Foundation, GMB, Harrow Council for Justice and LB Tower Hamlets (office response).
- 5.7.2. All Souls Serve the City, Keith Prince AM on behalf of the GLA Conservatives and Southwark Cyclists stated they considered the consultation questions were leading. All Souls Serve the City also considered questions should have been asked on the financial implications of the proposals both individually and on the wider economy.
- 5.7.3. The London Assembly City Hall Greens Group and London Living Streets raised issues with the questions/information being complicated or unclear. Addison Lee considered there should have been more open questions for a consultation of this nature.

Table 33: Detailed responses to issues/comments on consultation

	Issue/ comment	Times raised	Our response
A	Issues with the questions - leading	740	TfL's consultations are subject to rigorous pre-launch scrutiny and are planned and delivered according to good practice standards. The consultation provided the opportunity for the public and stakeholders to answer questions about reducing congestion, increasing active travel and the effectiveness of each of the proposed CC scheme changes in achieving these aims. These closed questions were followed by two open questions that allowed respondents to make any comments they had, and were invited to let us know of any positive or negative impacts they had identified and also any mitigations for them.
B	Issues with questions / information - complicated or unclear	736	See the response to Row A. A variety of materials were provided to support the consultation. These included plain English summaries of technical documents, providing a clear explanation of what was being proposed, why the changes were being proposed, and what the proposed changes were forecast to achieve. An 'Easy Read' version of the consultation materials and survey was also available. If respondents did not wish to use the online survey they could send their views by email or post.
C	Poor quality / design / presentation	384	See the responses to row A and B. The consultation was hosted on our consultation portal which aimed to provide information for people whether they had limited time and wanted a quick overview of the proposals, or if alternatively, they wished to read the background to the proposals in detail.
D	Issues with questions - No way to indicate support or opposition	351	See the response to row A. Respondents used the open questions to let us know if they supported or opposed the proposals and respondents also emailed or wrote to us with such comments, and this has been reflected in the coding frame.
E	Issues with questions - Can't express which proposals would work	277	See the response to row D. Further opinions could be expressed within the open text boxes, while it was also possible to send views on the proposed changes by email or post if people did not wish to respond through the online survey.

	Issue/ comment	Times raised	Our response
	best (e.g. don't ask opinions on certain aspects)		
F	Consultation material not advertised or publicised enough	232	Advertising and publicity for the consultation included emails to over 1.2 million recipients including customers and 1,800 to stakeholders; 136,000 postcard leaflets to residents in the CCZ; advertising in a number of London based newspapers; features in the Metro on TfL's travel page; and issuing a press release. Several digital advertising tools were also used targeting people who may have an interest, while the proposed changes were also highlighted through a digital radio advert. Full details on how we tried to make people aware of the consultation can be found in section 3 of this report.
G	Issues with questions - range of responses were limited	169	See response in rows A, D and E.
H	Consultation was difficult to access	123	<p>While it was necessary for people to register to respond to the consultation and use the portal for the first time, the same log-in information can be used for future consultations without having to repeat the standard questions, such as those regarding demographic information. For those who did not wish to register, it was possible to access the supporting information without registering and to send a submission to the consultation by email or Freepost. Information on how to access the consultation was widely published and advertised across different channels.</p> <p>Some people requested paper copies of the consultation materials and survey, and the project team made these available. People could reply with their paper survey responses or letters using a Freepost address.</p> <p>Some respondents commented that the consultation portal had crashed and required them to try another time to complete the survey. We were aware of a two hour period on 3 August when the portal went down after a large volume of emails were sent out which resulted in a high volume of traffic to the portal. We resolved the problem and</p>

	Issue/ comment	Times raised	Our response
			contacted everyone who had tried to access the portal in this two hour window. Many of these comments were received in the two days after this incident.
I	Issues with the questions - irrelevant	115	See responses to rows A, D and E.
J	Lack of data or evidence to support the proposals	101	The material supporting the consultation contained a wide range of information that provided background to what was being proposed, why it was being proposed, and what it is forecast to achieve. This was supported by a technical IIA, which considered in detail the implications of the scheme across various themes as well as an equalities impact assessment.
K	Oppose the need to register to access the consultation	76	<p>While registration is required the first time of use of the new consultation portal to respond through the online questionnaire, it was possible for responses to be submitted by email and post.</p> <p>Registration is now required to respond online to our consultations to enable us to notify people of the outcome of the project or provide an update and also allow us to notify people about other projects that may be of interest to them. It also helps us to ensure that people adhere to our community guidelines, underpinning a safe, constructive environment for everyone using 'Have your say'.</p> <p>Our new consultation portal went live in May 2021, and we will monitor feedback on the registration process across all the consultations we launch.</p>
L	Other comment about the consultation / consultation material	75	These comments included issues such as the importance of providing feedback on the consultation and accessibility suggestions. We will contact respondents after a Mayoral Decision has been made with a link to the consultation report. We will consider the accessibility suggestions and other comments to help us prepare for future major consultations.
M	Issues with questions - not possible to answer questions	54	See responses to rows A, D and E.

	Issue/ comment	Times raised	Our response
N	Inadequate space to provide detailed comments	54	There were two open questions about the proposals in the questionnaire, and there was no word count limit for responses. It was also possible for people to respond by submitting an email or by letter using the Freepost address.
O	No issues /general positive comment	52	These comments have been noted.
P	No questions relating to the financial aspects of the proposals	39	The purpose of the consultation was to provide the opportunity for the public and stakeholders to answer questions about reducing congestion, increasing active travel and the effectiveness of each of the proposed CC scheme changes in achieving these aims. Two open questions were available as part of the questionnaire that allowed respondents to highlight any impacts, issues or general comments, while responses could also be submitted by email or using the Freepost address.
Q	Issues with registration to access consultation	33	See response to row K. In the event of any questions about registration people were directed to contact haveyoursay@tfl.gov.uk , while it was also possible to submit responses to the consultation by email or Freepost.
R	No map of congestion zone	27	A map of the Congestion Charging zone was available as part of the consultation materials and available for access through the following link: https://haveyoursay.tfl.gov.uk/9275/widgets/26435/documents/14564

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

- 5.8.1. We identified a number of issues which, in our judgement, were not related either to the proposals directly, or to a related matter. In our consideration, these unrelated issues would give no scope to amend the proposals, nor would they provide any substantive reason against implementing them.
- 5.8.2. All of the issues we identified, including those which we considered were not related directly or indirectly to the proposals, are listed in the two code frames developed by AECOM in Appendix E.

6. Conclusions and recommendations

6.1. Conclusion

- 6.1.1. The CC scheme is an effective tool for managing traffic and congestion in central London, but it is necessary to keep the scheme under review to ensure its ongoing effectiveness and adapt it in response to changing circumstances, where necessary and in conformity with the MTS.
- 6.1.2. The most recent changes to the CC scheme were temporarily introduced as an emergency response to the transport challenges arising from the pandemic. Following the introduction of the temporary changes, we confirmed that no permanent change would be made without consultation, and now, as we begin to emerge from the pandemic, we need to consider how to ensure the Congestion Charge remains effective in the longer term. With this in mind, we have consulted on a set of proposals to change the CC scheme as described in this report.
- 6.1.3. Analysis of the consultation responses identified the comments/issues set out in Table 34 as the ones most frequently raised by respondents. While Table 34 is intended only as a summary, Chapters 4 and 5 of this report set out the responses in more detail, and Chapter 5 provides TfL's full response to issues raised.

Table 34: Frequently raised issues and summary of TfL response

Issue/comment	Summary of response to issue/comment
Opposition to weekend charging	The MTS highlights the transport challenges in central London, which, pre-pandemic, saw higher vehicle entries to the zone on Saturdays and Sundays than on an average weekday and traffic levels similar to weekdays. Cars (including PHVs) also made up a greater proportion of traffic over the weekend (70 per cent) than on an average weekday (50 per cent). Given this, it is necessary to take steps to reduce levels of traffic and congestion seen at the weekend, with the Congestion Charge being the most effective tool to do this.
Support for proposed weekday charging hours	These comments were noted.
Impacts on businesses and economy	Since its introduction in 2003, businesses operating and/or based in the CCZ will likely have adapted their practices to manage the impacts and may need to continue to do so. Congestion and delay are also a cost to many businesses in terms of uncertainty regarding delivery times, longer journey times or the need to use additional vehicles. It can also make central London unattractive to visitors and customers.

Issue/comment	Summary of response to issue/comment
	<p>Central London has a high level of accessibility by public transport from across the country, with taxis also providing a link into central London, enabling people to visit without the car, and with about 90 per cent of people doing so pre-pandemic. For those who are reliant on their car for access, the Blue Badge discount is available, while discounts are also available for residents and holders of the CVD. Where goods or items need to be collected, opportunities are available outside of changing hours and we encourage the use of micro-consolidation and onward distribution by electric vehicle and cargo bike where possible as set out in our Freight and Servicing Action Plan. Where these alternatives are not a viable option the proposed changes to the CC scheme will reduce traffic and help make journeys more reliable.</p> <p>While the Integrated Impact Assessment (IIA) identified a neutral impact on London's businesses overall, some businesses have different operating models in which they may see different impacts. This includes businesses such as car clubs and PHV operators, where the business purpose is vehicle travel in the CCZ. We have seen that since the removal of the PHV exemption, many operators have chosen to spread the cost of the charge, including through higher fares or surcharges for customers. It will be up to operators to decide how to manage increased costs as a result of these proposals, but they could be passed on, in part or in whole to the customer. Similarly, although it may be difficult for car club operators to pass on the charge to specific users entering the zone with multiple users per day, it may be possible for operators to pass on increased charges, in whole or in part, through increased rates for all drivers in the zone (or all drivers). Both PHV and car club operators may be able to specialise their operations using / re-distributing vehicles in the CCZ which are eligible for the Cleaner Vehicle Discount.</p>
Support to open residents' discount to new applicants	These comments were noted.
This is a money-making exercise for TfL	<p>The objective of the Congestion Charge is to manage traffic and congestion in London. Without the scheme, congestion and other adverse impacts of traffic, such as air pollution and increased carbon emissions, would be worse. The scheme is kept under review and from time to time it is appropriate to make changes to some or all elements of the CC scheme in order to maintain its effectiveness in achieving this objective. Potential financial impacts are not taken into account in developing any proposed changes to the CC scheme.</p> <p>All revenue from the Congestion Charge must be used to further the aims of the MTS, which includes improving public</p>

Issue/comment	Summary of response to issue/comment
Congestion is caused by Streetspace/other changes and schemes	<p>transport and making enhancements for people walking and cycling.</p> <p>The overarching objective of the MTS is to achieve 80 per cent of all journeys in London being made by walking, cycling or using public transport by 2041; however, this is higher for trips within central London (95 per cent) and between central London and inner / outer London (99 per cent). To deliver this, investment has been made to improve the environment and reduce road danger for people travelling by these modes, and which has included changes to the road network in central London.</p> <p>Central London has a tightly constrained road network, with a shift away from travel by car to other modes being the only long-term solution to ensuring London is an efficient well-functioning city as set out in the Mayor's Transport Strategy. The high demand for the movement of motorised traffic in the limited geographic space of the CCZ (one per cent of London's geographic area) results in the extent of congestion that is seen.</p>
The charge level is too high	<p>Prior to the introduction of the temporary changes, the previous increase to the charge level of Congestion Charge was made in 2014 (when it was raised from £10 to £11.50). This is the longest period without seeing a change, which has meant that the effectiveness of the charge has gradually been reduced.</p> <p>We have developed five post-COVID-19 pandemic scenarios to account for the increased uncertainty in our forecasting. These scenarios show that traffic levels in central London could increase from today and from pre-pandemic levels and this is reflected in both the Reference Case and Hybrid forecasts. With demand for road space in central London being particularly high, it is critical that the limited road space is used effectively for the essential movement of people and goods. The Congestion Charge is one of the tools available to us to help manage this demand in central London.</p>
Alternatives need greater investment to be more realistic choices	<p>With the objective of the MTS to achieve 80 per cent of all journeys to be made by walking, cycling or using public transport by 2041, multiple plans have been put into place to make travelling by these modes more accessible, convenient, safe, and reliable, and investment will continue to be made to deliver this. One specific example – which was mentioned by several respondents – is the planned gradual reopening of the Night Tube from November 2021.</p>
The consultation was biased/unfair or other criticisms of it	<p>TfL's consultations are subject to rigorous pre-launch scrutiny and are planned and delivered to good practice standards. The consultation provided the opportunity to answer</p>

Issue/comment	Summary of response to issue/comment
	questions about reducing congestion, increasing active travel and the effectiveness of each of the proposed Congestion Charge changes in achieving these aims alongside two open questions for further comments. General responses could also be submitted by email and to the Freepost address.

- 6.1.4. In developing the proposals consideration was given to the pre-pandemic situation and long-term transport challenges evident in central London (as outlined in the MTS). The effectiveness of proposals was also considered in relation to the persistent short to medium term challenges associated with the ongoing recovery from the pandemic.
- 6.1.5. This includes the need to act to prevent a car-based recovery from the pandemic, which there is simply not the space to accommodate in central London and which would be likely to hinder recovery. Our modelling shows that, unless action is taken, car traffic levels are likely to continue to increase, exacerbating the long-term challenges already identified.
- 6.1.6. Additionally, managing traffic demand in central London brings positive secondary impacts including reduced air pollution and carbon emissions. It also helps to improve the street environment for more space efficient modes of transport such as walking and cycling. At the same time, we will continue to invest in public transport to ensure it offers the most attractive option for longer journeys.
- 6.1.7. While not the primary objective of the Congestion Charge, ensuring it continues to be fit for purpose will support delivery of wider MTS objectives and those of other Mayoral strategies. This includes reducing the number of car trips being made, reducing road danger, taking action to address the climate emergency and reducing emissions from road transport.

6.2. Recommendations

The proposals

- 6.2.1. It is proposed that the recommendations outlined in 6.2.2, are delivered in two phases. The first phase would implement measures that do not require systems or infrastructure change as soon as possible following Mayoral decision. Changes that involve new signage and back-office systems, namely the proposed changes to operating hours will be introduced on 21 February 2022 due to their more complex implementation requirements.
- 6.2.2. It is recommended that the proposed measures, as consulted, are implemented as follows:

Proposals for delivery in phase 1 (if approved these would take effect from 20 December 2021)

- the charge level is £15.
- no charge is applied between Christmas Day and New Year's Day bank holiday inclusive. This means the period from Saturday 25 Dec 2021 to Monday 3 January 2022 (inclusive) would not be charged.
- the 90 per cent residents' discount is re-opened for all eligible residents to register for the discount.
- the pay 'next day' charge is £17.50 and the deadline is extended for making a delayed payment to three days after the day of travel.
- the Auto Pay and Fleet Auto Pay discount is removed.
- the reimbursement arrangements that were introduced as part of the temporary changes are retained or adapted to ensure that people most vulnerable to infection from epidemics and pandemics continue to be protected and to facilitate essential trips made by NHS staff in times of exceptional or extraordinary circumstances including for commuting purposes.
- the ability for residents to pay by App or online for multiple consecutive charging days is removed.

Proposals for delivery in phase 2 (if approved these would come into effect on 21 February 2022)

- the operating hours for the Congestion Charge are between 07:00-18:00 on weekdays and 12:00-18:00 on weekends and Bank Holidays.

Mitigations

6.2.3. Implementation of the new proposals, with or without modification would supersede the temporary changes. If the proposals are implemented as consulted on, we recommend that additional actions to mitigate the impacts of the proposals are implemented. These include:

- providing NHS trusts with communication materials to inform their patients of the eligibility for the extended NHS reimbursement scheme, including for pregnant women
- raising awareness of available discounts and exemptions, as part of the customer information campaign for the Proposed Changes; and through targeted stakeholder engagement with key groups, including faith groups
- undertaking additional targeted campaigning and outreach in relation to perceptions of safety on public transport for community groups, such as our campaign to support the safety of women and girls on our transport network.

Modifications

6.2.4. It is not proposed that any changes are made to the Variation Order, and in turn, to the Proposed Changes, as a consequence of issues raised in the consultation

responses. TfL is, however, proposing that two minor modifications unrelated to the consultation are made to the Variation Order:

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

6.2.5. These modifications are intended to give greater operational certainty to the introduction of the Proposed Changes or their ongoing implementation.

Modification 1

6.2.6. The Variation Order currently provides that the changes (other than to charging days and hours) would come into effect on the day following the Mayor's decision to confirm the Order. As the CC Scheme currently operates seven days a week, there would only be very limited time for any operational changes to be made to support the implementation of these changes if they were to come into force on the day following the Mayor's decision (any operational changes would effectively need to be done overnight).

6.2.7. It is now proposed that the date on which these changes would come into force is specified as Monday 20 December 2021 to allow for a short period in which the necessary operational changes could be made following the Mayor's decision. The date on which the proposed charging days and hours would come into force is also to be modified from 28 February 2022 to 21 February 2022. The Variation Order already provides for this phased approach to implementation of the Proposed Changes as it already states that the changes to charging hours and days would come into force on 28 February 2022 (to be modified to 21 February 2022); and the other changes would come into force the day after the Mayor confirms the Variation Order.

Modification 2

6.2.8. The modification to the deferred payment deadline is necessary so as to accommodate the proposals that no charges apply on bank holidays and the period between Christmas and New Year's Day.

6.2.9. By replacing 'third consecutive charging day' with 'day' in the two relevant articles in the Scheme Order, the deadline for paying the charge will be constantly maintained as three days after the charging day on which the motor vehicle was

used. Otherwise the payment deadline will vary depending on whether a bank holiday or the Christmas–New Year’s Day period falls within the three days after travel, since the proposal is for bank holidays and the festive period to not be chargeable. If the Variation Order is not modified, there would be unnecessary operational complexity when dealing with deferred payments made for travelling on the charging day before a bank holiday or on Christmas Eve.

- 6.2.10. The modification does not conflict with the description of the proposed change included in the consultation materials, since the payment deadline was stated simply as being three days after travel.