

The Greater London (Central Zone) Congestion Charging Order 2001

Report to the Mayor of London

Transport for London

February 2002

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Chapter 1

1 Introduction and background to the Scheme Order

1.1 Introduction

1.1.1 The Greater London (Central Zone) Congestion Charging Order 2001 was made by Transport for London (TfL) on 23 July 2001. The 'Scheme Order', as it is commonly referred to, has to be confirmed by the Mayor of London before it can come into effect. If the Mayor decides to confirm the Scheme Order, he may do so with or without modifications. The Mayor also needs to decide whether to hold a public inquiry before making his decision.

1.1.2 This report has been prepared by TfL to inform and advise the Mayor, to assist his decisions on whether or not to confirm of the Scheme Order with or without a public inquiry.

1.2 Contents of report

1.2.1 The report:

- presents the background to the Scheme Order – chapter 1;
- explains the legislative framework and procedures – chapter 2;
- summarises the consultation process – chapter 3;
- analyses the representations and objections received during the July 2001 consultation – chapter 4;
- presents an overview of TfL's consideration of the representations and objections received to the July 2001 consultation – chapter 5;
- describes developments since the July 2001 consultation affecting the scheme proposals and the Scheme Order – chapter 6;
- describes developments since the July 2001 consultation affecting the scheme impacts – chapter 7;
- describes progress on complementary transport measures since July 2001 – chapter 8;
- sets out proposed modifications to the made Scheme Order for consultation in December 2001 – chapter 9;
- analyses the representations and objections received during the December 2001 consultation – chapter 10;

- presents an overview of TfL's consideration of the representations and objections received to the December 2001 consultation on proposed modifications to the Scheme Order
– chapter 11;
- presents TfL's recommended modifications arising from the December consultation to the Scheme Order – chapter 12;
- sets out a summary of recommended modifications to the July 2001 Scheme Order
– chapter 13;
- sets out a cost benefit analysis and financial implications if the Scheme Order is confirmed by the Mayor based on TfL's recommendations – chapter 14;
- considers the options for and implications of a public inquiry – chapter 15; and
- presents TfL's recommendations to the Mayor – chapter 16.

1.2.2 Detailed information on many of the aspects covered above is contained in a series of annexes to the report:

- The Greater London (Central Zone) Congestion Charging Order 2001, as made by TfL on 23rd July 2001 – Annex A;
- a detailed description of the legislative framework and procedures – Annex B;
- a report from W S Atkins consultants, analysing the results of the July 2001 consultation
– Annex C;
- details of TfL's consideration of representations received to the July 2001 consultation
– amplifies chapter 5 – Annex D;
- updates to the information on the impacts of the scheme made available for the July 2001 consultation on the Scheme Order – amplifies chapters 7 and 8 – Annex E;
- analysis of representations and objections received to the December 2001 consultation, covered in chapter 10 – Annex F;
- details of TfL's consideration of representations and objections received to the December 2001 consultation on proposed modifications, covered in chapter 11 – Annex G;
- a schedule of modifications to the December 2001 Scheme Order recommended by TfL, covered in chapter 12 – Annex H; and
- The Greater London (Central Zone) Congestion Charging Order 2001, Instrument of Confirmation 2002 – incorporating TfL's recommended modifications to the Scheme Order
– Annex I.

1.3 History of the Development of Scheme Proposals

- 1.3.1 Various forms of charging to reduce congestion in central London have been studied over the years, from paper permits to full electronic road pricing, where vehicles are fitted with an automatic sensor and payment system. The general case for congestion charging was established by the Government sponsored London Congestion Charging Research Programme – the report of which was published in 1995. This looked at a range of options, including electronic road pricing over a wide area of London. A study by a group of independent transport professionals, the Road Charging Options for London (ROCOL) report, commissioned by the Government, concluded in 2000 that a charging system based on vehicle registration numbers with a £5 daily charge and enforced by cameras could have a 'significant impact on traffic conditions' in central London. Such a system is described in the ROCOL report as 'an option that would be feasible and enforceable'.
- 1.3.2 ROCOL considered alternatives to an 'area licensing' scheme based on a number-plate database and digital camera enforcement. It specifically considered a paper based system and electronic road pricing. A paper based system was rejected due to the inconvenience of buying paper licences and the risk of significant non compliance. ROCOL considered that it was unlikely that electronic road pricing compatible with national standards could become operational during the Mayor's first term of office.
- 1.3.3 Under the ROCOL report's option of an area licence enforced using cameras, drivers who wished to bring their vehicles into the charging zone (or use their vehicles within the charging zone when the scheme was operating) would pay the charge and notify their vehicle registration numbers to the charging authority. Automatic number plate readers, a form of camera, would check notified vehicle registration numbers against those observed within the charging zone. This technology is already in use for toll collection in North America and Australia. The general operation of congestion charging has been proven to be effective in Singapore.
- 1.3.4 In July 2000 the Mayor of London asked TfL to investigate the implementation of a congestion charging scheme for central London based on the work of the ROCOL group. The Mayor was minded to proceed with an area licensing scheme.
- 1.3.5 A Greater London Authority (GLA) discussion paper, Hearing London's Views, was published in July 2000, to seek the views of key stakeholder groups on aspects of congestion charging. This particularly sought views on the boundary of the charging area, the level and structure of charges, the hours of operation, exemptions and discounts, penalty charges and possible spending priorities for the proceeds. The responses indicated the level of support for the concept of a central London congestion charging scheme: six times as many stakeholders supported the concept of introducing a congestion charging scheme in central London as opposed it.
- 1.3.6 Prior to the publication of the Draft Transport Strategy, the Greater London Assembly and functional bodies were consulted on the 'early' version of the Draft Transport Strategy. The Draft Transport Strategy, published in January 2001, indicated the importance the Mayor attached to tackling congestion in central London. It described in some detail how a congestion charging scheme based on the work of the ROCOL group might operate and the benefits it could generate. It contained a proposal, 4G.19, that TfL develop a

congestion charging scheme for central London, and that TfL make a Scheme Order setting out the detailed operation and configuration of the scheme.

- 1.3.7 Consultation responses to the Draft Transport Strategy showed support for the Mayor's objective of tackling traffic congestion in central London by means of such a charging scheme and for the general configuration of the scheme as outlined in that draft Strategy. Almost nine in ten of those who completed a response form viewed 'reducing traffic congestion across London, and particularly in central London and London's town centres' as 'important'. Almost seven in ten regarded 'the Strategy approach to tackling traffic congestion including the proposal for a central London congestion charging scheme' as 'important'. 84 organisations out of 96 expressing a view supported the proposal to introduce congestion charging in central London with seven rejecting the principle and five opposing the scheme in its present form.
- 1.3.8 TfL continued to examine the scheme outlined in the Draft Transport Strategy. In particular the technology was examined with a number of trials, the likely operational arrangements were explored, the impacts were considered in more detail and the scale of traffic management necessary to accommodate displaced traffic was assessed. This confirmed the conclusion of the ROCOL report that such a scheme was operationally feasible and enforceable; and that there was much to be gained from introducing a congestion charging scheme in central London as early as possible. Further work was undertaken during the first half of 2001 to develop the details of the scheme.
- 1.3.9 In May 2001, the Mayor issued 'Interim Guidance from the Mayor of London to Transport for London on the procedures for introducing a congestion charging scheme within Greater London'. This set out advice to TfL on the procedures to be followed in introducing schemes including advice on consultation, the making of a Scheme Order by TfL and the confirmation of a Scheme Order by the Mayor. It also included a Direction from the Mayor on the form and content of a charging scheme order. The Guidance was interim as it was produced prior to the publication of the Mayor's Transport Strategy and prior to regulations under the Greater London Authority Act 1999 affecting congestion charging schemes in London. However, TfL understand that the Mayor is not planning to issue any further guidance for the time being. TfL have therefore complied with the Mayor's Direction on the form and content of the Order and have generally complied with his advice on procedures.
- 1.3.10 On 10 July 2001, the Mayor of London published his Transport Strategy as the first step in providing Greater London with a world class transport system fit for the 21st century. The Strategy aims to increase the capacity, reliability, efficiency, quality and integration of the transport system to provide a world class transport system. The Strategy identified ten key transport priorities including reducing traffic congestion.
- 1.3.11 Reducing traffic congestion was seen as directly contributing to increasing economic prosperity, making London liveable, increasing London's accessibility and reducing environmental degradation. The Strategy seeks to address the problem of congestion through an integrated package of improvements in public and social transport, better enforcement of traffic and parking regulations, better management of the transport network and further encouragement of walking and cycling - as well as the introduction of the proposed central London congestion charging scheme.

- 1.3.12 In the Strategy, the Mayor set out his policy that a congestion charging scheme order for central London should be made by TfL broadly in line with a scheme which he outlined in Annex 5 of the Strategy.
- 1.3.13 The Strategy contained two specific proposals, 4G.13 and 4G.14, related to a central London congestion charging scheme:
- 4G.13 Transport for London will make an order to introduce a congestion charging scheme in central London broadly as outlined in annex 5 – the congestion charging scheme for central London. (Subject to confirmation of the Scheme Order, the congestion charging scheme should be introduced as quickly as practicable, with the aim of introduction in January 2003).
- 4G.14 Supporting measures to the proposed congestion charging scheme, as outlined in annex 5 – the congestion charging scheme for central London, will be introduced by Transport for London and the boroughs.
- 1.3.14 In July 2001, The Road User Charging (Charges and Penalty Charges) (London) Regulations 2001 made by the Secretary of State for Transport, Local Government and the Regions came into force. They deal with the procedures relating to the imposition of charges and penalty charges for a congestion charging scheme in London, including liability for charges and penalty charges, and powers to examine, enter, immobilise, remove and dispose of vehicles.
- 1.3.15 Also in July 2001, The Road User Charging (Enforcement and Adjudication) (London) Regulations 2001 made by the Lord Chancellor came into force. They set out the procedures for the enforcement and adjudication of congestion charging schemes in London. The provisions cover, in particular, requirements relating to the notification, adjudication and enforcement of penalty charges, the determination of disputes, appeals against determinations, the appointment of persons to hear any such appeals and the admissibility of evidence in such proceedings.
- 1.3.16 On 23 July 2001, Transport for London made a scheme order for a central London congestion charging scheme, 'The Greater London (Central Zone) Congestion Charging Order 2001', in order to directly facilitate the achievement of the policies and proposals set out in the Mayor's Transport Strategy. The Scheme Order provides the legal basis for the implementation of the proposed scheme and sets out in detail the key aspects of the scheme.
- 1.3.17 An extensive consultation process started on the details of the scheme as described in the Scheme Order. This process is described in detail in chapter 3.
- 1.3.18 As a result of the representations received in response to public consultation in July 2001 on the Scheme Order, TfL proposed, subject to further consultation, a number of modifications to the Scheme Order.
- 1.3.19 A further round of consultation commenced on 10 December 2001, when TfL published for consultation a version of the Scheme Order as proposed to be modified. This consultation process is also described in chapter 3.

1.3.20 Following the conclusion of consultation on these proposed modifications, TfL has considered these further representations and objections and prepared this report for the Mayor.

1.4 Reasons for making the Scheme Order

1.4.1 In the Transport Strategy, it was noted that the proposed scheme, combined with improvements to public transport, would provide a powerful means of securing one of the Mayor's key priorities - tackling traffic congestion:

- it would reduce congestion, not only within, but also beyond the charging zone; road users would have quicker and more reliable journey times, and traffic queues would reduce;
- it would be more effective in reducing through traffic than other measures; for example, parking controls can reduce terminating traffic, but can increase through traffic – a particular problem for central London;
- it would take advantage of the extensive public transport serving central London. Already over 75% of people coming to central London in the morning peak are travelling by Underground, rail or bus;
- it would improve bus operations; 40% of all bus journeys within London are on routes which serve central London – their journey times and reliability are severely impeded by traffic congestion;
- it would produce substantial net revenues; which by law must be spent on improving transport within Greater London for a minimum of ten years from the introduction of the scheme;
- it would benefit business efficiency; as growing congestion is a serious threat to business and employment in London;
- it would integrate well with other initiatives to reduce congestion and improve public transport and would support a wide range of objectives;
- it would make central London a more pleasant location; with less congestion it would be easier to move around; and be more attractive to businesses and visitors; and
- it would be relatively quick to introduce. A scheme could be operational in central London by early 2003.

1.5 Summary description of the proposed scheme

1.5.1 This Report is intended to be made public following the decision of the Mayor. The following summary of the scheme and its projected impacts, assuming the scheme were introduced with all the modifications to the Scheme Order as proposed by TfL, has been inserted to assist a wider readership. Any reader is advised to also refer to the Mayor's decision on confirmation of the Scheme Order.

1.5.2 Where would the charges apply?

The charging zone would be bounded by the Inner Ring Road: ie Marylebone Road, Euston Road, Pentonville Road, Tower Bridge, Elephant & Castle, Vauxhall Bridge and Victoria. This will provide a diversion route for displaced through traffic. There would be a charge for the use of vehicles on roads within the charging zone, but not for using the Inner Ring Road itself.

1.5.3 When would charges apply?

The charging hours would apply from 7.00am to 6.30pm, Monday to Friday. There would be no charge on Public Holidays.

1.5.4 What charges would apply?

The standard daily charge would be £5 per vehicle. Charges could also be paid weekly, monthly or annually.

1.5.5 When would charges have to be paid?

To drive or park on the street within the charging zone during the hours of operation, the registration number of each vehicle (unless exempt or eligible for a 100% discount) would have to be notified to Transport for London as the charging authority, and the charge paid. Note, however, that residents with parking permits are exempt in certain circumstances – see below. Normally this would be done in advance of the vehicle being in the charging zone. However, vehicle registration numbers can also be notified up to midnight on the day of travel. For payment after 10.00pm but before midnight on the day of travel, the charge would be £10 to encourage pre-payment, better planning of journeys and to assist enforcement.

1.5.6 Which vehicles will be charged?

The congestion charge would apply to all motor vehicles except exempt vehicles and those registering for a 100% discount, which are outlined below. Special provisions will apply to certain vehicles registered in Northern Ireland, the European Community or European Economic Area member states.

Exemptions and discounts

It is proposed that the following vehicles would be fully exempt from congestion charging:

- Motorbicycles and mopeds;
- London licensed taxis (Black Cabs), and fully licensed private hire vehicles (Minicabs);
- Public Service Vehicles (buses) with 9 or more seats;
- Vehicles currently classified by the Driver and Vehicle Licensing Agency (DVLA) as emergency vehicles and exempt from Vehicle Excise Duty (VED);
- National Health Service vehicles currently exempt from VED;
- Disabled Passenger Carrying vehicles currently exempt from VED; and
- Vehicles used by disabled persons currently exempt from VED.

1.5.7 It is proposed that the following vehicles would be eligible for a 100% discount from the congestion charge though it will be necessary to pre-register these vehicles and verify their status:

- certain military vehicles;
- certain operational vehicles used by the emergency services in addition to those classified by DVLA as emergency vehicles;
- certain operational vehicles used by HM Coastguard and the Port of London Authority for emergency responses on the River Thames;
- vehicles operated by or providing services for the eight London Boroughs within or partly within the charging zone, and performing certain functions;
- certain operational vehicles used by the Royal Parks Agency;
- community buses or buses operating under a Section 19 permit;
- private vehicles used by certain NHS staff required to use their private cars to carry controlled drugs, confidential patient records, bulky, heavy or fragile equipment or other specified material; and
- private vehicles required to be used by firefighters for operational travel between London fire stations.

1.5.8 It is proposed that the following vehicles would also be eligible for a 100% discount but an annual charge of £10 will be required to cover the costs of administration and verification:

- Light Goods Vehicles and Heavy Goods Vehicles propelled by certain alternative fuels;
- cars and light vans propelled by certain alternative fuels;
- electrically propelled vehicles;
- vehicles used by disabled persons in receipt of a Blue Badge (formerly an Orange Badge); and
- breakdown and recovery vehicles.

1.5.9 It is proposed that private vehicles registered to a keeper who is a resident within the charging zone would be eligible for a 90% discount of the congestion charge. This discount would be subject to confirmation of residency status and vehicle ownership, and payment of an annual £10 charge and would be limited to one vehicle per resident. This discount would be for a minimum of one week's charge, which for a 90% discount amounts to a cost of £2.50. Residents with a relevant parking permit, living inside the charging zone can park all day in a residents' on-street parking place within their local parking zone without paying any congestion charge. However, if they moved their vehicle within the charging hours they would be liable to pay the discounted charge.

- 1.5.10 How would the proposed scheme work?
Drivers using a vehicle in the charging zone would pay the charge, either in advance or on the day, to have the registration number of their vehicle entered into a database. TfL, as the charging authority, would maintain the database of vehicle registration numbers. Inclusion of an individual's vehicle registration number on the database could be for a day, a week, a month, or on an annual basis.
- 1.5.11 Drivers could pay the charge and notify their vehicle registration numbers at retail outlets, by post or phone, or over the internet.
- 1.5.12 Accounts will be available for operators of fleets, registering more than 25 vehicles. There would be two types of system, both involving payments in advance. For both schemes there would be a registration procedure involving the fleet operator stating in advance which vehicles are in the fleet, and payment of an annual £10 registration charge for each vehicle. No penalty charges would be applied to vehicles pre-registered under an agreed 'fleet account'.
- 1.5.13 The goods vehicle scheme would be limited to excluding cars. Operators would pay a higher daily charge and there would be a 'decrementing' procedure, whereby charges would be paid for pre-registered vehicles detected automatically in the charging zone through their registration number.
- 1.5.14 The scheme aimed at cars would be available to all vehicle types. The fleet operator would confirm at the end of the account period which vehicles had been present in the charging zone.
- 1.5.15 How would the scheme be enforced?
The number plates of vehicles entering or moving within the charging zone would be inspected by a network of fixed and mobile cameras. Parked vehicles could also be inspected by foot patrols. The registered keeper of any vehicle, which has been identified within the charging zone without an appropriate congestion charge having been paid, would be liable to a penalty charge of £80. This would be discounted to £40 for payment within 14 days. If a penalty charge has not been paid and there are no representations or appeals, a charge certificate would be issued after 28 days and the registered keeper would be liable for a penalty charge of £120.
- 1.5.16 There would also be a system of vehicle clamping and/or removals to deal with persistent evaders, i.e. when there are three or more penalty charges outstanding with respect to the vehicle. The system of clamping and/or removals would apply within Greater London and not just within the charging zone. Bailiffs would also be used to recover the debts from outstanding penalty charges.
- 1.5.17 In addition, the charging scheme would have a system of appeals and independent adjudication comparable to the current arrangements for adjudication of disputed parking penalty charges in London.
- 1.5.18 Public Transport Measures to complement the proposed scheme
Congestion charging would be complemented by a range of new measures designed to make public transport and other alternatives to car travel easier, cheaper, faster and more

reliable. For a summary of progress with these measures, from July 2001 to date, please refer to chapter 8 of this report. Revenue from congestion charging could enable these initiatives to be expanded.

1.5.19 Traffic management to complement the proposed scheme

The congestion charging scheme would be accompanied by the introduction of traffic management measures on roads around the charging zone to deal with displaced traffic. This will include the management of diversion routes such as the Inner Ring Road and the management of displaced traffic to protect unsuitable routes and locations. In addition, better management of on-street parking around the charging zone will seek to ensure that there is no increase in on-street parking to the detriment of residents or local businesses. Traffic signing will be provided to inform drivers about the location and operation of the scheme and to assist and direct drivers who wish to avoid the charging zone.

1.5.20 Monitoring

An extensive programme of monitoring is being put in place by TfL so that any necessary or desirable adjustments to the scheme can be identified and introduced, both in the short and long term. The monitoring would cover not only operational traffic and transport impacts, but the potentially more subtle changes to, for example, households, different social groups, businesses, schools, public services, tourism and leisure, and the environment. The monitoring programme commenced in Spring 2001 and would continue for several years if the Scheme Order was confirmed.

1.6 Summary of the scheme impacts

1.6.1 What would be the effects of the proposed scheme?

If the Mayor confirmed the Scheme Order with the modifications proposed by TfL, it would provide a powerful means of securing one of the Mayor's key priorities – tackling traffic congestion – while simultaneously contributing to the delivery of other mayoral priorities and providing revenues to bring forward other transport initiatives within the Mayor's Transport Strategy for London.

1.6.2 It would reduce congestion, not only within, but also beyond the charging zone. Studies by TfL have indicated that during the critical morning peak period, 7.00am to 10.00am, the scheme would reduce the level of traffic within the charging zone by 10-15% with a £5 charge for cars and commercial vehicles, and the exemptions and discounts outlined earlier. This would reduce queuing delays by 15-25% within the charging zone and improve conditions elsewhere, particularly on main roads into and out of the zone.

1.6.3 It would be more effective in reducing through traffic than other measures, such as parking controls because much of the through traffic within the charging zone would divert.

1.6.4 It would take advantage of the extensive public transport serving central London. In the morning peak period, when public transport is most crowded, there would be a total increase in passengers on rail, Underground and bus services to central London of about 2%. Additional bus capacity is being introduced as part of the Transport Strategy which will cater for this increase. The additional bus capacity and improved reliability would result in some existing Underground and rail passengers transferring to bus, thus

widening the choice of alternatives for those who decide not to travel to or within the charging zone by car.

- 1.6.5 It would improve bus operations. 40% of bus journeys in London are on routes which come into or cross the charging zone. Journey times would become more reliable as congestion is reduced inside the charging zone and on main routes into the zone.
- 1.6.6 It would produce net revenues of £130 million or more per year. By law, the net revenues must be spent on transport proposals that conform to the Transport Strategy. Priorities in the short term could include significant improvements to bus operations, enhanced accessibility to the transport system, better maintenance of roads and bridges, and more facilities for pedestrians and cyclists. Priorities in the long term could include bringing forward the expansion of Underground and rail capacity, new Thames Gateway river crossings, and improved access to London's town centres.
- 1.6.7 It would benefit business efficiency generally. Improved traffic conditions, inside and outside the charging zone would result in business journeys by car and taxi and deliveries by commercial vehicles becoming quicker and more reliable.
- 1.6.8 It would make central London a more pleasant location - with less congestion it would be easier to move around and be more attractive to businesses, residents, workers, visitors and tourists.

1.7 Greater London Assembly – scrutiny process

- 1.7.1 The development of the central London congestion charging scheme has been subject to continuing formal scrutiny by the members of the London Assembly. This has been undertaken by a Panel appointed by the Assembly's Transport Policy and Spatial Development Policy Committee (TPSDP) and chaired by Lynne Featherstone, the chair of TPSDP. The Panel's work has been assisted by two expert advisors, Martin Richards and Tony Travers.
- 1.7.2 The Panel took evidence during September/October 2000 from three sources; officers of the GLA and TfL, independent experts and the Mayor himself. They produced a report, 'Congestion Charging, London Assembly Scrutiny Report' in November 2000. The report's recommendations were endorsed by the Greater London Assembly on 1 November 2000 and forwarded to the Mayor as a formal proposal requiring a response.
- 1.7.3 The Mayor's Response to the Report of Findings was sent in November 2000 and a number of documents covering project plan, project budget, project management, complementary bus measures, monitoring strategy and traffic flow effects have been sent during 2001.
- 1.7.4 A system is now in place whereby comprehensive progress reports are sent to the Chair of the TPSDP every six months. A report was sent on 31 August 2001 and further reports are due on 28 February and 30 August 2002. Following the 31 August 2001 report, Derek Turner, Managing Director, TfL Street Management, appeared before the Committee on 30 October 2001.

- 1.7.5 TfL welcome the helpful work of the Scrutiny Committee and its recommendations have been adopted where appropriate.

Chapter 2: Legislative framework and procedures

2.1 Introduction

- 2.1.1 This chapter summarises the legislative and procedural framework underlying the introduction of a congestion charging scheme for central London. It describes the powers and responsibilities of both the Mayor of London and TfL in relation to congestion charging schemes.
- 2.1.2 This chapter is to be read together with Annex B, which provides further details of the legislative and procedural powers and requirements, and other policies and guidance. In particular, Annex B identifies specifically how the different elements of the legislative framework and procedures have been used or complied with in the preparation of the Scheme Order.

2.2 Background

- 2.2.1 The Scheme Order has been prepared against the background of more general duties, policies and functions of the GLA, Mayor and TfL, as provided for by The Greater London Authority Act 1999 (as amended by section 199 and Schedule 13 of the Transport Act 2000) ('the GLA Act').
- 2.2.2 Principal amongst these are the requirements for the Mayor, firstly, to develop and implement policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London (in section 141 of the GLA Act), and, secondly, to prepare and publish a document containing the Mayor's policies and proposals to achieve this: the Mayor's Transport Strategy (in section 142 of the GLA Act).
- 2.2.3 The GLA Act also provides for the creation and control of TfL and its functions. In particular, TfL is to work to assist the Mayor in developing, publishing and implementing the Mayor's transport policies and proposals, and is required to act in accordance with the Mayor's guidance and directions (by section 154 and paragraph 34 of Schedule 23 of the GLA Act). In carrying out its functions, TfL is also to have regard for other Mayoral strategies for London (for example, the spatial development strategy) and the Mayor's wider obligations (for example, regarding the promotion of equality of opportunity); for further information, see row 2 in the table at Annex B.
- 2.2.4 The proposed congestion charging scheme is one element of the Mayor's Transport Strategy.
- 2.2.5 The Mayor must comply with human rights obligations. Section 6 of the Human Rights Act 1998 makes it unlawful for a public authority to act in a way which is incompatible with human rights found in the European Convention on Human Rights. Having considered the implications of the proposed scheme and the representations raised, together with the evidence for and against the proposed scheme, TfL does not consider that a decision confirming the Scheme Order would engage any such human rights of individuals or

businesses. Human rights issues are considered further in row 2 of the table in Annex B, and also at the beginning of chapter 15 of this report.

2.3 Assessment of Environmental Impacts

2.3.1 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 give effect to the directive 85/337/EC (as amended) on the assessment of the effects of certain public and private projects on the environment, in relation to projects involving the grant of planning permission under domestic legislation. The confirmation of the Scheme Order by the Mayor is not a grant of planning permission and therefore there is no requirement to consider the need for an environmental impact assessment for the purposes of these Regulations. The issue of potential scheme impacts is considered further elsewhere in this report, in particular, please refer to chapter 7 and annex E5.

2.4 Relevant documents

2.4.1 The powers and rules for introducing congestion charging schemes in London are derived from the GLA Act, in particular in Schedule 23. Pursuant to this Act, the Mayor has published two further documents which are particularly relevant.

2.4.2 Firstly, in May 2001, the Mayor published Interim Guidance for TfL on the procedures for introducing congestion charging schemes in Greater London. This included directions on the form and content of any scheme order.

2.4.3 Secondly, the Mayor published his Transport Strategy for London in July 2001. This sets the policy framework for transport in London for the next ten years. The Transport Strategy includes a proposal for a central London congestion charging scheme and sets out the broad details of a scheme.

2.4.4 The GLA Act also provided for the making of regulations governing this type of scheme. The Government has made two sets of regulations. These relate to the imposition of charges (including penalty charges) and enforcement and adjudication processes. These regulations have been described in more detail in chapter 1.

2.5 Specific Legislative Provisions

2.5.1 Unless otherwise stated below in this chapter, references to paragraphs are references to paragraphs in Schedule 23 of the GLA Act.

2.5.2 Powers of the GLA in relation to the proposed scheme may be exercised by the Mayor acting alone (paragraph 2 in Schedule 23).

2.5.3 Transport for London has the power to be a charging authority for any charging scheme in Greater London. Section 295(1) of the GLA Act provides for a scheme to be established and operated by TfL – ‘...Transport for London...may establish and operate schemes for imposing charges in respect of the keeping or use of motor vehicles on roads in its area’. Section 295(2) of the GLA Act refers to, and gives effect to, the main provisions for congestion charging in Schedule 23. Paragraph 9(2) provides that a TfL scheme may apply to an area which consists of the whole or any part of Greater London.

- 2.5.4 Any charging scheme must be set out in an order made by TfL and confirmed by the Mayor. Paragraph 4 in Schedule 23 states that any charging scheme must be set out in an order, and that that order must be made by the charging authority (i.e. TfL) and submitted to, and confirmed (with or without modification) by, the Mayor. The Mayor (exercising the functions of the GLA) is to decide whether or not to confirm the Scheme Order, either with or without modification(s), whether or not further consultation is necessary, and whether or not to hold a public inquiry.
- 2.5.5 Any scheme must accord with the Mayor's Transport Strategy. Paragraph 3 requires that, 'A charging scheme may only be made if it appears desirable or expedient for the purpose of directly or indirectly facilitating the achievement of any policies or proposals set out in the Mayor's transport strategy', and paragraph 5 states that, 'A charging scheme must be in conformity with the Mayor's transport strategy'. There are numerous respects in which the proposed scheme has been prepared to be in conformity with the Transport Strategy. These are detailed in the table of Annex B, in particular from row 10 onwards. Examples of such conformity include the charging zone boundary being broadly in line with the Inner Ring Road (see row 10 in the table in Annex B) and the level of the standard daily charge being £5 (see row 13 in the table in Annex B).
- 2.5.6 The Scheme Order must be in the form determined by the Mayor, (paragraph 4(2)). That form was set out within the Mayor's Interim Guidance, published in May 2001. The form of the Scheme Order follows that set out in the Interim Guidance. (This guidance was published as 'interim' guidance because it was issued in advance of the Transport Strategy and Government regulations being published. It made clear that the Mayor could issue further guidance if necessary following publication of these documents. Since publication, however, no such need has yet been identified, but the Mayor remains able to issue further guidance).
- 2.5.7 There are certain aspects of a scheme which must be set out in the Scheme Order. These include the area to which it applies, the classes of motor vehicles liable to charges, those roads where charges apply and the level of charges (paragraph 8) and the events which lead to a charge being imposed (paragraph 10(1)). The specific parts of the Scheme Order setting out this information are identified in the table at Annex B, in rows 10 (area of application), 11 (motor vehicles) and 15 (events leading to a charge being imposed). Charges imposed in relation to vehicles being kept on charging area roads must also apply in respect of vehicles being used in that charging area, (paragraph 10(2)).
- 2.5.8 TfL has specific powers to levy charges on roads irrespective of whether or not TfL is the traffic or highway authority, (paragraph 9(6)).
- 2.5.9 There are limitations on TfL's powers. A road cannot be subject to charges imposed by more than one charging authority at the same time (paragraph 9(4)). A scheme cannot impose charges in respect of a trunk road without the consent of the Secretary of State (paragraph 9(7)). A scheme cannot impose charges, or require or authorise either examination or removal of, or fitting of immobilisation devices to, vehicles not on roads (paragraph 31). The proposed scheme does not do any of these things.
- 2.5.10 There are certain powers relating to charges. A scheme may provide for the manner in which charges are to be made, collected, recorded or paid (paragraph 10(3): article 6, in the Schedule to the Scheme Order, provides for this); in setting charging rates TfL may consider the purposes for which TfL is to apply the net proceeds of a scheme (paragraph

10(5)). A scheme may vary charges for different days, different times of day, different parts of the charging area, different distances travelled and different classes of motor vehicle (including motor vehicles defined in relation to any circumstances including those people or institutions using them, e.g. disabled persons), (paragraphs 10(4) and 1(3): these permit the proposed scheme, for example, to apply no charge during certain hours and at weekends). A scheme may include exemptions from charge, reduced rates of charge or set limits on the charges payable (paragraph 11(2): this allows the proposed scheme, for instance, to grant exemptions for certain vehicles, e.g. ambulances and fire engines).

- 2.5.11 The Scheme Order must include a statement of TfL's proposed General Plan for applying TfL's share of the net proceeds of the proposed scheme during the opening 10 year period (paragraph 19(1)). The net proceeds during those first 10 years must be applied only for transport purposes which directly or indirectly facilitate the implementation of policies or proposals set out in the Mayor's Transport Strategy (paragraph 16 (1)). The net proceeds of charging schemes may only be applied for purposes which provide value for money (paragraph 16 (5)). In terms of compliance with these requirements, the Scheme Order provides for and sets out this General Plan for the proceeds at article 15 in the Schedule and Annex 2 of the Scheme Order. The General Plan must comply with any guidance issued by the Secretary of State for Transport, Local Government and the Regions (paragraphs 16(2) and 17)). The Secretary of State has not, however, issued any such guidance. Separately, irrespective of whether or not the Mayor decides to confirm the Scheme Order, the proposed scheme cannot come into force until the Secretary of State has approved the statement of TfL's General Plan for the net proceeds (paragraph 19(3)).
- 2.5.12 The proposed scheme must state the period for which it is to remain in force, in particular, if it is to remain in force indefinitely (paragraph 37). The Scheme Order makes the position clear on this at article 2(2), and, in its Schedule, at article 16.
- 2.5.13 The Mayor has discretion over a number of matters in relation to public consultation and a public inquiry, (paragraph 4(3)). He has discretion over whether to carry out consultation in relation to a scheme, or to require TfL to consult. He can require TfL to publish its proposals for a scheme and to consider objections to the proposals. He also has discretion about holding an inquiry, or causing an inquiry to be held. He can also make modifications to the Scheme Order made by TfL.
- 2.5.14 In the paragraph immediately above, none of the provisions are mandatory. Instead they are all at the discretion of the Mayor. The Mayor has, however, a positive duty to consider in each case whether or not it is appropriate to exercise his discretion.
- 2.5.15 Nevertheless, the Mayor has stated from the outset that he would consult on the proposed scheme. Details of the full extent of the consultation that has taken place on the proposed scheme and the Scheme Order are set out in Chapter 3 of this report.

2.6 Procedural guidance

- 2.6.1 In accordance with paragraph 34 of Schedule 23 to the GLA Act, on 24 May 2001 the Mayor issued Interim Guidance to TfL in relation to the procedures for them introducing congestion charging schemes. This Interim Guidance included a direction on the form with which the Mayor expected a Scheme Order to conform. A copy of the Interim

Guidance was included as Item 2 in the Scheme Order Information Pack. Chapter 3 of this report gives more detail on this Information Pack.

- 2.6.2 In addition to giving directions on the form and content of the proposed scheme, the Interim Guidance also gives guidance on the procedures, including consultation processes, that TfL should follow. This includes preliminary consultation prior to the making of a scheme order by TfL, details of the process whereby TfL makes and publishes a scheme order, consultation on a made scheme order and the procedure for confirmation of a scheme order by the Mayor.
- 2.6.3 The Interim Guidance suggests that there should be a consultation period of at least 42 days, (paragraph 15). In fact, a longer period was allowed for consultation. The initial consultation on the made Scheme Order alone lasted for 68 days, from 23 July to 28 September 2001, with certain consultees being allowed extensions beyond this as a result of requests for particular circumstances to be considered. On top of this, for a further 40 days, TfL subsequently undertook another period of consultation, on the version of the Scheme Order as proposed to be modified, from 10 December 2001 to 18 January 2002.
- 2.6.4 The Mayor indicated that he would consider all representations and other material before deciding whether or not to hold a public inquiry and whether or not to confirm the Scheme Order with or without modifications (paragraph 18).

2.7 Transport Strategy

- 2.7.1 The Mayor published his Transport Strategy in July 2001. Chapter 1 of this report gives more detail on the Transport Strategy.
- 2.7.2 Apart from setting out the policies and proposals relating to congestion charging, and describing the proposed scheme, the Transport Strategy sets out the procedures to be followed particularly with respect to consultation, (at Annex 5 of the Transport Strategy, paragraphs 34 – 38).
- 2.7.3 The proposed scheme must be in conformity with the Transport Strategy, as outlined in paragraph 2.5.5 above and detailed in the table in Annex B.

Chapter 3: The consultation process

3.1 Introduction

- 3.1.1 This chapter provides an overview of the consultation activities undertaken by TfL during preliminary consultation and formal public consultation on the Greater London (Central Zone) Congestion Charging Order 2001 and on the proposed modifications to the Scheme Order. This builds on the consultation undertaken by the GLA on the Mayor's Draft Transport Strategy, which included broad details of the proposed charging scheme.
- 3.1.2 Public consultation on the Scheme Order ran for 10 weeks from 23 July to 28 September 2001. Public consultation on the proposed modifications to the Scheme Order ran from 10 December 2001 until 18 January 2002. The consultation activities carried out during these periods were designed to:
- meet the requirements laid down in the Interim Guidance from the Mayor of London to TfL on the procedures for introducing congestion charging schemes within Greater London; and
 - reach representative groups and those affected by the proposed central London congestion charging scheme so that they had the opportunity to make representations and objections during the consultation periods.

3.2 The Interim Guidance from the Mayor

- 3.2.1 The Mayor issued Interim Guidance to TfL on the procedures for introducing congestion charging schemes within Greater London on 24 May 2001. The Interim Guidance set out the Mayor's requirements as to the form a charging Scheme Order should take, and guidance as to the consultation arrangements, including a period of 'preliminary consultation', that TfL should undertake if TfL were to make a Scheme Order.
- 3.2.2 The Interim Guidance made clear that the Mayor would expect that before TfL had made an Order for a congestion charging scheme, it should carry out a period of preliminary consultation with a number of specified bodies or organisations. It also specified that where TfL decided to make a road user charging Scheme Order, the Mayor would expect TfL to publish a 'notice' of the making of the Order in a newspaper or newspapers circulating in the area to which any charging scheme applies and in the London Gazette. In addition, it was noted that the Mayor would expect TfL to display notices on roads affected by the Order, i.e. inside and adjacent to the charging zone.
- 3.2.3 The Interim Guidance was sent to more than 100 individuals or organisations for their information, including Members of the Greater London Assembly, the 33 London Boroughs, the GLA Functional Bodies, the emergency services, business representative groups, motoring organisations, and groups representing the interests of disabled persons.

3.3 Preliminary consultation

- 3.3.1 In line with the Mayor's Interim Guidance, TfL conducted a period of preliminary consultation with key stakeholders. The preliminary consultation ran from 20 June to 13 July 2001. In accordance with the Interim Guidance, a statement of the general nature and effect of the scheme and a map of the proposed charging zone was produced by TfL and sent to 130 key stakeholders for their comment.
- 3.3.2 To supplement the written material, TfL also arranged a series of 14 consultation meetings with groups of key stakeholders. At the meetings, additional information was made available to the stakeholders on the background, programme, key features and anticipated impacts of the proposed scheme. This information was based on the material subsequently published in the Mayor's Transport Strategy. The consultation meetings also provided an opportunity for stakeholders to seek clarification on specific issues and for questions to be answered.
- 3.3.3 Written responses to the preliminary consultation were received from 25 stakeholders.

3.4 Public consultation on the made Scheme Order

- 3.4.1 TfL made an Order – The Greater London (Central Zone) Congestion Charging Order 2001 – on 23 July 2001. Public consultation on the made Scheme Order ran for 10 weeks from 23 July to 28 September 2001. In line with the Mayor's Interim Guidance and good practice, TfL publicised the consultation extensively and produced written material, as explained below.

Notice to publicise the making of the Scheme Order

- 3.4.2 A notice was produced to publicise the making of the Scheme Order. The notice included:
- the Scheme Order title;
 - a brief outline of the general nature and effect of the proposed congestion charging scheme;
 - details of where the Scheme Order, deposited plans and a statement of reasons for introducing a congestion charging scheme and other supporting documents could be inspected;
 - the freephone number for people to gain further information;
 - the freepost and email addresses for people to send their written representations and objections on the made Scheme Order; and
 - the date by which representations and objections were to be received.
- 3.4.3 The notice was published on 23 July 2001 in both the Evening Standard (circulation 428,000) and the London Gazette (circulation 8,000).

3.4.4 Copies of the notice were displayed in every street inside the proposed congestion charging zone (the zone where charges would apply), on the Inner Ring Road itself, and in every street outside the charging zone within a 250 metre radius of the boundary. For streets more than 250 metres in length, additional copies of the notice were displayed such that one notice was in place for every 250 metres of road. In total, some 5,800 notices were displayed.

3.4.5 A weekly rolling inspection programme was carried out to replace any damaged or missing street notices so that they remained in place for the duration of the consultation.

Scheme Order information pack

3.4.6 A Scheme Order information pack - Central London's Problem... Our solution: The Central London Congestion Charging Scheme Proposals - was produced by TfL. It contained the following:

- a copy of the made Scheme Order: The Greater London (Central Zone) Congestion Charging Order 2001;
- Interim guidance from the Mayor of London to TfL on the procedures for introducing a congestion charging scheme within Greater London;
- the Scheme Order Notice;
- a Statement of reasons for making the Scheme Order;
- a Statement of the general nature and effect of the proposed congestion charging scheme for central London;
- a copy of the Explanatory Notes – The Greater London (Central Zone) Congestion Charging Order 2001;
- a Map of the proposed Central Zone (where charges would apply);
- a Traffic Management statement;
- a statement of How improvements in London's transport will complement the congestion charging scheme;
- a statement of How the congestion charging scheme supports the Mayor's strategies for London;
- a statement on Monitoring the impacts of the scheme; and
- a copy of the public information leaflet, which gave details of the public exhibition, public meetings, and freepost and email addresses to which representations and objections could be sent.

- 3.4.7 The information pack was made available for public inspection at the offices of each of the eight London Boroughs wholly or partly within the proposed congestion charging zone, together with a copy of the deposited plans (details of the addresses of the offices of the eight London Boroughs are set out in Appendix 1 to this chapter). The same information was also made available at TfL Street Management's Faith Lawson House offices and at a public exhibition held in central London for the 10 week duration of the consultation.
- 3.4.8 Accompanying the Scheme Order information pack was a set of deposited plans that showed the detailed location of the charging zone boundary on a road-by-road basis at 1:1250 scale.
- 3.4.9 The information pack was also sent to 500 key stakeholders. The stakeholders included, inter alia, all the London Boroughs and the local authorities surrounding Greater London, Members of the Greater London Assembly, MP's and MEP's with constituencies within Greater London, business representative groups, groups representing the interests of disabled persons, all NHS Trusts and Health Authorities within Greater London, motoring organisations, bus and train operators, and groups representing the interests of different national/ethnic, religious, and voluntary groups.
- 3.4.10 To supplement the information pack, TfL also arranged a series of consultation meetings with groups of key stakeholders. Meetings were organised with the 33 London Boroughs and the Association of London Government (ALG), the emergency services, the NHS London Regional Office and NHS trusts, the Association of London Markets, business representative groups, motoring organisations, representatives of the breakdown and recovery industry, groups representing the interests of disabled persons, residents groups, the London Development Agency, the Society of London Theatre, the utilities, the Royal Parks Agency, and groups representing the alternative fuel and freight transport industry. The meetings provided an opportunity for stakeholders to seek clarification on specific issues and for questions to be answered. Many of these organisations met TfL representatives on more than one occasion during the consultation period.

Public information leaflet

- 3.4.11 A 12 page public information leaflet was produced by TfL. The leaflet explained how the proposed congestion charging scheme would work, the proposed exemptions and discounts, what measures were being put in place to complement the scheme, the likely impact of the scheme, and details of how to make representations and objections to TfL on the proposals.
- 3.4.12 Copies of the leaflet were made available in the following languages: Bengali, Chinese, Greek, Gujarati, Hindi, Punjabi, Turkish and Urdu. The leaflet was also produced in Braille, large print, and as an audio cassette.
- 3.4.13 2,000 copies of the public information leaflet were sent to each of the 33 London Boroughs for them to make available to the public as they deemed appropriate. Additional copies of the leaflet were provided to the London Boroughs if they so required them.
- 3.4.14 The information leaflet was also made available to the public at an exhibition held in central London (see below for details) and to callers phoning the freephone telephone

number or TfL staff direct. Just over 2,000 copies of the leaflet were sent out to individual members of the public following calls to the freephone telephone number.

Advertising

3.4.15 In addition to direct approaches to stakeholders, adverts were placed in newspapers and on the radio to inform Londoners of the consultation on the Scheme Order. Taking account of both media, it is estimated that the total audience reached directly was 64% of all adults living within Greater London and 56% of drivers in Greater London. Others may have been informed of the consultation by contact with those directly reached.

3.4.16 An A3 size four page pull out, which gave details of the proposed congestion charging scheme, including a map of the proposed charging zone, appeared in the following newspapers:

Area	Paper	Circulation	Date appeared: week commencing
Greater London	Evening Standard	428,000	13/08/01
Camden	Camden New Journal	60,000	06/08/01
Islington	Islington Gazette	18,000	06/08/01
Hackney/ Tower Hamlets/ Docklands	Hackney Gazette	13,000	06/08/01
	East-End Life	69,000	06/08/01
	East London Advertiser	17,000	06/08/01
	The Wharf	45,000	06/08/01
Lambeth/ Southwark/	South London Press	36,000	06/08/01
City of Westminster/	London Weekly Times	150,000	06/08/01
City of London	London Newspaper Group	8,600	06/08/01
	Fulham Chronicle Series	7,500	06/08/01

3.4.17 Two radio adverts were broadcast from 30 July to 26 August 2001, including during peak drive-time periods. The adverts invited listeners to take part in the consultation exercise and advised them to call the freephone number to obtain a copy of the public information leaflet. The advert was broadcast on the following radio stations:

Capital FM;

- Capital Gold;
- Heart 106.2 FM;
- Magic 105.4 FM;
- Xfm;
- Jazz FM;
- Choice FM;
- Star FM;
- London Turkish Radio;
- London Greek Radio; and
- Sunrise Radio.

Public exhibition

- 3.4.18 For a seven week period, a public exhibition, permanently staffed by TfL Congestion Charging Division staff, was held at two central London venues as follows:

Central Hall Westminster
Storey's Gate, LONDON, SW1H 9NH
13-31 August 2001 (open Monday-Friday, 10.30am-7.30pm);
Saturday 18 and 25 August (10.00am-6.00pm).

Greater London Authority Visitor Centre
Romney House, Marsham Street, LONDON, SW1P 3PM
3-14 September 2001 (open Monday-Friday, 9.30am-7.00pm)
17-28 September (open Monday-Friday, 9.30am-5.00pm).

- 3.4.19 The exhibition was publicised through the notice appearing in newspapers and on the street, via the public information leaflet and on the TfL Street Management website.
- 3.4.20 The exhibition contained ten large panels, which provided information on the proposed congestion charging scheme, together with maps of the expected traffic impacts and proposed complementary traffic management measures. Copies of the exhibition panels were made available to each of the eight London Boroughs within the proposed charging zone for them to use at their own meetings or place on public display if they so wished. A copy of the Scheme Order information pack and 'deposited plans' were made available for inspection. In addition, information sheets on the following topics were available:
- traffic and transport modelling;
 - discounts and exemptions; and
 - complementary transport measures.
- 3.4.21 A form was provided at the exhibition to enable the public to express their views on the proposed scheme or to ask any specific questions that the exhibition staff were unable to answer.
- 3.4.22 Of those that visited the public exhibition, a total of 279 people registered as visitors over its seven week duration.

Public Meetings

- 3.4.23 In order to give people the opportunity to air their views orally, two public meetings were held at the Shaw Park Plaza Hotel, NW1. The meetings were held on 10 and 11 September 2001 at 7:00pm. 54 people attended the first meeting and 62 attended the second. The meetings were advertised via the public information leaflet, the newspapers listed in paragraph 3.4.16 above, and on the TfL Street Management website.

Call centre

- 3.4.24 A call centre was in operation throughout the duration of the consultation period and it received over 2,500 calls from individual members of the public. Call centre staff handled requests for information including sending out copies of the public information leaflet, providing details of where the Scheme Order information pack and deposited plans were available for inspection, and details of the venues of the public exhibition and two public meetings. More detailed enquiries were referred to the congestion charging communications team for them to respond to.
- 3.4.25 The freephone number for the call centre was widely publicised via the notice in newspapers and on the street, the public information leaflet, the TfL Street Management website, and the radio and newspaper advertising.

Website

- 3.4.26 A summary of the proposed congestion charging scheme was made available on the TfL Street Management website www.streetmanagement.org.uk. A brief introduction to the proposed scheme was also included on the GLA and TfL Corporate websites with 'hot links' through to the congestion charging section of the Street Management website.
- 3.4.27 All the formal documents contained in the Scheme Order information pack were also available on the website for visitors to download.
- 3.4.28 It is not possible to determine accurately how many people viewed the congestion charging section of the website. However, figures for the entire TfL Street Management website for the duration of the consultation period are as follows:

- Hits	1,357,491
- Page views	121,979
- Visits	36,530
- Unique visitors	11,166

Hit - a single action on the web server.

Each occasion that a visitor downloads any file on the website is counted as a 'hit'.

Page views – 'hits' to files designated as pages.

Visits – the number of times a 'visitor' viewed the website.

Unique visitors - individuals who visited the site during the consultation period. If someone visits more than once, they are counted only the first time they visit.

- 3.4.29 Further evidence of the level of public interest shown in the proposed congestion charging scheme includes the following:

- The two most downloaded files on the entire site were information on the proposed congestion charging scheme. These files were the charging zone map (downloaded 7,416 times) and the public information leaflet (downloaded 2,852 times).
- After the Street Management home page (www.streetmanagement.org.uk), the congestion charging 'introduction' page (www.streetmanagement.org.uk/initiatives/congest_charge/1_cc_intro.htm) was the most popular entry page to the entire website.
- Of the 20 most frequently viewed pages on the entire website, eight were for congestion charging totalling 28,534 views.

Response provisions

3.4.30 The public were provided with a number of means of formally expressing their views on the proposed congestion scheme including:

- a freepost address: Transport For London (Congestion Charging Scheme Order Consultation), Freepost Lon17507, London SW1H 0YZ;
- an on-line response form via the TfL Street Management website;
- an email address: ccs@tfl.gov.uk;
- a form provided at the public exhibition; and
- a form provided at Faith Lawson House.

3.5 Public consultation on TfL's proposed modifications to the Scheme Order

3.5.1 Following consideration of the representations and objections received during the public consultation on the made Scheme Order and other developments, TfL proposed a number of modifications. Public consultation on the proposed modifications ran from 10 December 2001 until 18 January 2002. Again, in line with the Mayor's Interim Guidance and 'good practice', TfL publicised the consultation extensively and produced written material. Many activities carried out for the public consultation on the made Order were repeated for the public consultation on TfL's proposed modifications. These are detailed below.

Notice to publicise the proposed modifications to the Scheme Order

3.5.2 A notice was produced to publicise TfL's proposed modifications to the Scheme Order. The notice included:

- the title of the Scheme Order;
- a brief outline of TfL's proposed modifications to the Scheme Order;

- details of where the Order incorporating all the proposed modifications and a schedule of the modifications with the reasons for them, together with other supporting documents, could be inspected;
- the freephone number for people to gain further information;
- the freepost and email addresses for people to send their written representations and objections on the proposed modifications to the Scheme Order; and
- the date by which representations and objections to the modifications were to be received.

3.5.3 The notice was published on 10 December 2001 in both the Evening Standard (circulation 428,000) and the London Gazette (circulation 8,000).

3.5.4 Copies of the notice were also displayed on the streets and periodically inspected and renewed as necessary as outlined in paragraph 3.4.4 and 3.4.5 above.

Proposed modifications information pack

3.5.5 An information pack outlining TfL's proposed modifications to the Scheme Order was produced by TfL and contained the following documents:

- a copy of the Scheme Order – The Greater London (Central Zone) Congestion Charging Order 2001 - as proposed to be modified, 10 December 2001;
- Explanatory Notes to accompany the Scheme Order as proposed to be modified, 10 December 2001;
- a Schedule of Modifications proposed by TfL to the Scheme Order;
- a map of the proposed charging zone and the proposed new residents' discount zone; and
- the public information leaflet, with a supplement explaining TfL's proposed modifications.

3.5.6 The information pack was made available for public inspection at the offices of TfL Street Management and the eight London Boroughs, as outlined in paragraph 3.4.7 above.

3.5.7 Accompanying the proposed modifications information pack was a set of the deposited plans, as proposed to be modified. These showed the detailed location of the proposed changes to the charging zone boundary and the proposed new residents' discount zone boundary on a road-by-road basis at 1:1250 scale.

3.5.8 The information pack was also sent to 500 key stakeholders (details of which are set out in paragraph 3.4.9 above).

3.5.9 To supplement the information pack, TfL arranged a series of consultation meetings with key stakeholders. Meetings were organised with the NHS London Regional Office, the

London Fire & Emergency Planning Authority (LFEPA), the London Ambulance Service NHS Trust, Consignia, the Energy Savings Trust, the Freight Transport Association and the Confederation of British Industry. The meetings provided an opportunity for stakeholders to seek clarification on specific issues and for questions to be answered.

Contact with those who responded to the public consultation on the made Order

- 3.5.10 TfL contacted the 2,000 stakeholders, other organisations and individual members of the public who responded to the consultation on the made Order (unless they had requested that TfL not do this) to advise them of the opportunity to comment on TfL's proposed modifications to the Scheme Order, by letter or email, depending on the mode they used previously. The letter to stakeholders enclosed a copy of the information pack; the letter or email to the other organisations or individual members of the public directed them to the website for this information. Both included details of how they could submit representations and objections to TfL.

Supplement to the public information leaflet

- 3.5.11 A 2 page supplement was produced by TfL to be used as an insert to the original public information leaflet (see paragraph 3.4.11 above). The supplement explained TfL's proposed modifications to the Scheme Order and how to make representations to TfL on the proposed changes.
- 3.5.12 The supplement and public information leaflet were made available in response to requests from individual members of the public calling the freephone number.
- 3.5.13 Copies of the supplement and public information leaflet were made available in the following languages: Bengali, Chinese, Greek, Gujarati, Hindi, Punjabi, Turkish, and Urdu. The supplement was also produced in Braille, large print, and as an audio cassette.

Call centre

- 3.5.14 A call centre was in operation throughout the duration of the consultation period on TfL's proposed modifications to the Scheme Order, using the same freephone number as used during the public consultation on the made Scheme Order. Call centre staff handled requests for information including sending out copies of the public information leaflet with the supplement, and providing details of where the information pack and deposited plans, as proposed to be modified, were available for inspection. Again, more detailed enquiries were referred to the congestion charging communications team for them to respond to. Over the six week consultation period the call centre handled 83 calls and sent out 53 leaflets/supplements.
- 3.5.15 The freephone number for the call centre was publicised via the notice in newspapers and on the street, the public information leaflet and supplement, and the TfL Street Management website.

Website

- 3.5.16 The summary of the scheme proposals on the TfL Street Management website www.streetmanagement.org.uk were amended to incorporate the proposed modifications and included the formal documents from the information pack (see paragraph 3.5.5 above). The public consultation on TfL's proposed modifications to the Scheme Order was also included in the brief introduction to the scheme on the GLA and TfL Corporate websites with 'hot links' through to the congestion charging section of the Street Management website.

Figures for the congestion charging section of the TfL Street Management website for the duration of the second consultation period are as follows:

- Hits	39,966
- Page views	24,882
- Visits	5,704
- Unique visitors	2,876

Hit - a single action on the web server.

Each occasion that a visitor downloads any file on the website is counted as a 'hit'.

Page views – 'hits' to files designated as pages.

Visits – the number of times a 'visitor' viewed the website.

Unique visitors - individuals who visited the site during the consultation period. If someone visits more than once, they are counted only the first time they visit.

Response provisions

- 3.5.17 The public were provided with a number of means of formally expressing their views on TfL's proposed modifications to the proposed congestion scheme including:
- a freepost address: Transport For London (Congestion Charging Scheme Order Consultation), Freepost Lon17507, London SW1H 0YZ;
 - an on-line response form via the TfL Street Management website; and
 - an email address: ccs@tfl.gov.uk.

3.6 Further consultation with selected Boroughs

- 3.6.1 As part of its consideration of the representations received to the public consultation on the proposed modifications to the Scheme Order, TfL wrote to selected Boroughs on 25 January seeking reactions to a further proposed modification – that vehicles used by a local authority for the provision of commercial services in competition with the private sector should not qualify for a 100% discount.

3.6.2 Several Boroughs replied expressing their views.

APPENDIX: Venues where the deposited packs were made available for public inspection

- | | |
|-------------------------|--|
| - Southwark | John Harvard Library, SE1 |
| - Camden | Environment Department, Town Hall, WC1 |
| - Islington | Central Reference Library, N5 |
| - Lambeth | Transport And Highways Department, SW9 |
| - Corporation of London | Guildhall Library, EC2 |
| - Tower Hamlets | Council Offices, E3 |
| - Hackney | Environmental Services, EC1 |
| - Westminster | One-Stop Services, SW1 |
| - Transport For London | Faith Lawson House, SW1 |

Chapter 4: Analysis of representations received to the July 2001 consultation

4.1 Introduction

4.1.1 Consultants WS Atkins were commissioned by TfL to code, analyse and report on the representations and objections to the July 2001 consultation on the made Scheme Order. This chapter summarises their report, the full text of which is at Annex C.

4.1.2 A total of 2,274 representations were analysed by WS Atkins, broken down by respondent type as follows:

- 149 representations from 'stakeholders', i.e. from the 500 key organisations who were sent the made Scheme Order and supporting information;
- 232 representations from 'other organisations' that responded on behalf of the interests of a wider group, for example businesses, residents' associations, etc; and
- 1,893 representations from individual members of the public.

4.2 Overall reactions to the proposals

4.2.1 Table 1 below details the level of support or opposition to the proposed congestion charging scheme, among respondents to the July 2001 consultation exercise. Respondents were coded according to whether they expressed support or opposition to the congestion charging scheme, with or without giving reasons, or caveats for their support. Not all respondents stated support or opposition to the scheme, and some only asked questions.

4.2.2 These findings need to be interpreted with caution. This was not a poll of general public and business opinion in London. Every attempt was made though, when consulting stakeholder organisations, to achieve a complete and therefore representative view of their opinions as a whole. For the general public and non-stakeholder organisations in London, this was an opportunity for those with concerns about the proposed congestion charging scheme to register their point of view.

4.2.3 Respondents from these groups are therefore self selecting. It is likely that these respondents will tend to hold particularly strong opinions, and will be skewed towards those who oppose the proposed scheme. Indeed it was clear that there were a number of significant orchestrated campaigns of response by individual members of the public, organised by pressure groups. The temptation to interpret these findings as the latest poll of Londoners' opinions on congestion charging should therefore be resisted.

Responses	Stakeholders	Other organisations	Members of the public
Number received	149	232	1,893
Support	56%	25%	36%
Oppose	13%	39%	47%
Not Stated	31%	36%	17%

Table 1: Consultation respondents' level of support or opposition to the congestion charging scheme

4.2.4 The issues that WS Atkins considered stood out as most important to respondents were classified into the following themes:

- the need for improvements to public transport before the proposed scheme is introduced;
- concerns about possible increased traffic congestion near the charging zone boundary;
- suggested changes to various discounts and exemptions;
- adjustments to the charging zone boundary;
- timings and level of charge;
- concerns about the adequacy of the Scheme Order consultation;
- potential adverse impacts on businesses; and
- the concern that the charge is another 'tax' on motorists.

4.2.5 Each of these themes is explored briefly below, focussing on reservations over support for the proposed scheme and reasons for opposition to the proposals. A more extensive analysis of these and other themes is presented in the WS Atkins report at Annex C. The numbers of respondents commenting on each of the themes in the paragraph above is given, along with salient points identified by WS Atkins. This listing is not exhaustive but indicates the most significant issues, both quantitatively and qualitatively.

4.3 Detailed reactions

4.3.1 An overview of TfL's consideration of all the representations made during the July 2001 consultation is presented in Chapter 5 of this report. Annex D provides TfL's detailed consideration of all the representations made during the July 2001 consultation.

4.4 The need to improve public transport before the proposed scheme is introduced

39 Stakeholders 52 Other Organisations 747 Individual Members of the Public

- want guaranteed improvements to public transport before the proposed scheme is introduced;
- want a guarantee that revenues from the proposed scheme will be spent on improving public transport, walking and cycling facilities;
- question whether the proposed complementary public transport measures will meet increased demand; want a guarantee of additional funding if required;

- public transport is currently inadequate for most disabled people; need better 'door-to-door' services; and
- WS Atkins noted a lack of awareness among individual members of the public about the proposed complementary public transport measures, or dissatisfaction with the alternatives to car use offered.

4.5 Concerns about possible increased traffic congestion near the charging zone boundary

27 Stakeholders 54 Other Organisations 500 Individual Members of the Public

- need effective, flexible traffic and parking management, with ongoing monitoring of conditions;
- queries over safety for pedestrians and cyclists:
- possible adverse effects on the efficiency of buses around the Inner Ring Road;
- question the suitability of Tower Bridge/other routes to carry displaced traffic;
- possible adverse effects on emergency services response times; and
- pressure on parking near rail stations outside the charging zone boundary.

4.6 Suggested changes to the proposed 100% discount for Blue Badge holders

38 Stakeholders 7 Other Organisations 20 Individual Members of the Public

- the discount should apply to disabled persons living outside Greater London;
- eligibility should be widened to include other disabled persons, e.g. people who are deaf, partially sighted or people with learning disabilities
- rather than the Blue Badge criteria, use the Taxicard/Dial-a-Ride eligibility criteria
- the £10 annual registration fee is unfair; and
- the Blue Badge scheme is already subject to widespread abuse.

4.7 Suggested new exemption/discount for commercial delivery vehicles

18 Stakeholders 43 Other Organisations 51 Individual Members of the Public

- businesses making deliveries have no public transport alternative; their vehicles have to be in the charging zone; and
- the proposed scheme should focus on commuters rather than delivery vehicles.

4.8 Suggested new exemption/discount for NHS/emergency services staff using their own vehicles

18 Stakeholders 9 Other Organisations 51 Individual Members of the Public

- staff need to use private vehicles to administer care or respond to emergencies in the charging zone; and
- possible adverse effects of the congestion charge on recruitment/retention.

4.9 Suggested changes to the proposed 100% discount for certain alternative fuel vehicles

13 Stakeholders 21 Other Organisations 10 Individual Members of the Public

- all vehicles using alternative fuels (including bi/dual fuel and clean diesel) should be given a discount; and
- discount should be based on emissions rather than the fuel used, e.g. Euro III emissions standards.

4.10 Suggested changes to proposed exemption for Public Service Vehicles with 17 or more seats

12 Stakeholders 12 Other Organisations 8 Individual Members of the Public

- PSVs with between 9 and 16 seats should be exempt; and
- PSVs help to reduce congestion.

4.11 Suggested changes to the proposed exemption for motorcycles

8 Stakeholders 3 Other Organisations 35 Individual Members of the Public

- motorcycles should not be exempt: they are a dangerous form of transport and contribute to pollution.

4.12 Suggested new discount/exemption for residents living near the charging zone boundary

8 Stakeholders 16 Other Organisations 159 Individual Members of the Public

- communities could be 'cut off' by the proposed congestion charge; and
- need a 'buffer zone' where a discount would apply; or a sliding scale of discounts based on distance from the boundary.

4.13 Suggested changes to the proposed 90% discount for residents of the charging zone

7 Stakeholders 14 Other Organisations 152 Individual Members of the Public

- residents should have a full exemption rather than 90% discount;
- charging zone residents already pay high charges for parking, and many are on low incomes;
- many residents are occasional car users and/or travel in the opposite direction to commuter traffic;
- residents should not have to pay a registration fee because they already pay to register for their parking permits;

- unfair to only receive a residents' discount on a weekly, monthly or annual licence; this could encourage people to use their cars more often;
- introduce a 'carnet' type licence for residents making occasional trips; and
- the consultants noted that significant numbers of charging zone residents were unclear or had misconceptions about how the proposed scheme would affect them.

4.14 Suggested new discount/exemption for voluntary/charity workers

14 Stakeholders 10 Other Organisations 7 Individual Members of the Public

- must avoid diluting charity funds; particularly those running transport services for vulnerable groups;
- the proposed congestion charge may deter volunteers, particularly those providing care services within the charging zone.

4.15 Changes to the proposed charging zone boundary

9 Stakeholders 24 Other Organisations 156 Individual Members of the Public

- would generate more revenue to spend on transport improvements with a larger charging zone;
- alter the boundary to prevent bottlenecks and protect Tower Bridge;
- use the river as the southern boundary; and
- concerns about charges applying to vehicles loading or unloading at premises fronting the Inner Ring Road, but where access to these premises requires entering the charging zone.

4.16 Changes to the proposed level of the congestion charge

9 Stakeholders 8 Other Organisations 130 Individual Members of the Public

- the charge should be higher than the cost of an All Zones One Day Travelcard;
- increase the charge to create a stronger deterrent against driving in central London and raise more money for investing in public transport;
- set a higher charge for heavy goods vehicles; and
- reduce the charge for cars with more than one occupant, smaller cars, and/or cleaner cars.

4.17 Extend the proposed charging hours/days

7 Stakeholders 3 Other Organisations 36 Individual Members of the Public

- extend to weekends or longer hours on weekdays.

4.18 Shorten the proposed charging hours/days

8 Stakeholders 8 Other Organisations 32 Individual Members of the Public

- finish earlier to protect the evening economy; end at 6.30pm to be in line with parking controls.

4.19 Adequacy of consultation on the Scheme Order

7 Stakeholders 11 Other Organisations 75 Individual Members of the Public

- not enough time was allowed for consideration of the Scheme Order;
- the information provided was not detailed enough to allow a fully informed response;
- concerns about the amount and quality of traffic modelling information available; and
- concerns about the geographical coverage of the exhibitions; and a lack of information for the boroughs to use to consult with their residents.

4.20 Potential adverse impacts on businesses

16 Stakeholders 58 Other Organisations 164 Individual Members of the Public

- some businesses might re-locate or close down;
- charging could increase the disparity between supermarket and independent store prices;
- larger businesses would pass charges on to consumers; smaller operations unable to do so; and
- clients and suppliers would go to stores outside the charging zone.

4.21 The charge is another 'tax' on motorists

9 Stakeholders 17 Other Organisations 217 Individual Members of the Public

- already pay enough taxes in general;
- already pay enough in 'road taxes'; and
- the money raised would be spent in 'non-transport' areas; or never know how it was spent.

Chapter 5: Consideration of the representations and objections received to the July 2001 consultation

5.1 Introduction

- 5.1.1 This chapter provides an overview of TfL's consideration of the representations and objections received following public consultation on the Scheme Order commencing in July 2001. It also presents TfL's proposed modifications to the Scheme Order. A further consultation was to follow in December 2001 on a revised version of the Scheme Order incorporating all TfL's proposed modifications.
- 5.1.2 TfL has considered all the representations and objections received as a result of the consultation exercise which took place from 23 July to 28 September 2001, including late responses and responses received up until the start of the December 2001 consultation process. Annex D1 provides a review of TfL's detailed consideration of representations and objections received from all stakeholders and other organisations as well as those which have been raised by 5 or more individual members of the public, and sets out TfL's response.
- 5.1.3 Those representations and objections raised by 4 or less individual members of the public are listed separately in Annex D2. TfL has considered the representations and objections set out in Annex D2. However, TfL has not provided a specific response to these representations in this report, and none are referred to in this chapter. TfL considers that these representations are either effectively addressed by responses in Annex D1 or contain no material which merits a separate response in this report.
- 5.1.4 The Mayor has reviewed copies of all the representations and objections summarised in Annex D1 and D2.
- 5.1.5 In Annex D1, representations and objections have been categorised into 'themes' and 'sub-themes' according to the issue being considered, along with TfL's detailed conclusions and proposals. This means that a representation from a respondent dealing with more than one issue will be split up accordingly and dealt with under the appropriate themes or sub-themes. The individual themes are listed at the start of Annex D1. The modifications arising from these proposals form a substantial part of the consultation exercise starting in December 2001; these are summarised in Chapter 9.
- 5.1.6 The chapter sub-headings that follow give the titles of each of the themes. Below each sub-heading there is a summary of the key issues within the theme (and sub-themes) and an outline of TfL's considerations and conclusions. For more detail on both representations and TfL's consideration of them, refer to Annex D1
- 5.1.7 It is important to note that this chapter does not contain any analysis or summary of TfL's consideration of representations received in response to the consultation exercise commencing in December 2001. As a result, TfL's considerations and proposed modifications summarised in this chapter are interim only. TfL's firm conclusions and recommendations to the Mayor are made following consideration of representations received on the consultation exercise, which commenced in December 2001.

Accordingly, for an appreciation of TfL's final position on the scheme proposals, this chapter must be read together with chapter 11 and Annex G to this report.

- 5.1.8 In this chapter, and in the associated Annex, those representations that simply expressed support for the scheme proposals are not dealt with. The focus is on the representations that, whilst generally supportive, expressed one or more concerns about the proposals; and the representations that objected to part or all of the proposals.

5.2 Representations and Objections

Theme 1: The principle of congestion charging

- 5.2.1 Representations and objections falling within this theme concern the general principle of introducing congestion charging to central London. The main representations put forward suggested that the proposed scheme was politically motivated; that it was an infringement of civil liberties; that the charge was simply a tax on drivers; that traffic levels were not the cause of congestion; that existing traffic conditions did not justify charging; that the proposed scheme conflicted with other Mayoral policies; that charging was inequitable or regressive; or that the proposed scheme was a waste of public money.
- 5.2.2 TfL's detailed consideration of the above representations takes account of the statutory powers to introduce congestion charging in London and the policies and proposals contained within the Mayor's Transport Strategy. Consideration is given to the traffic conditions prevalent in central London. There is also recognition that congestion charging has been identified as the most effective method available to reduce congestion, by deterring less necessary vehicle journeys and encouraging people to reassess the way they travel. In response to concerns that the charge could be seen as regressive, (like petrol taxes and parking charges, it applies uniformly to all drivers), TfL is of the view that these concerns need to be judged in the context of the Mayor's overall Transport Strategy. The Strategy outlines measures to be funded from the net proceeds of the proposed scheme, some of which are likely to be progressive in nature, such as improving bus services and restructuring of bus fares.
- 5.2.3 TfL considers that the congestion charge is not a tax on drivers, rather it is a charge for scarce road space. It is a payment for access to more space, with revenues raised to be re-invested in public transport improvements.
- 5.2.4 The proposed scheme is considered to conform with data protection legislation and best practice. A data protection manager has been appointed.
- 5.2.5 Following the July 2001 consultation exercise, TfL considers that the proposed scheme is the best available means of reducing congestion in central London, where it is most severe. TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate as result of representations under this theme.

Theme 2: Alternatives to a congestion charging scheme

- 5.2.6 Representations and objections falling within this theme concern suggested alternative methods of reducing congestion in central London. By contrast with congestion charging among the alternatives suggested were: raising parking charges, increasing road capacity

and improving public transport. Other suggestions included introducing tolls for using bridges, a low emission zone, a car-free zone, restrictions on commercial vehicles in the rush hour, and the outright banning of cars.

- 5.2.7 TfL considers that, in combination with other policy initiatives in the Mayor's Transport Strategy, no single alternative or group of alternatives would be as effective as congestion charging. Some suggestions are contrary to Mayoral objectives; in particular, the idea of banning certain categories of vehicle altogether, which would raise significant issues of social inclusion. Some of the proposals such as the Low Emission Zone and public transport improvements are already being progressed through the Mayor's Transport Strategy or draft Air Quality Strategy, and would be complementary to (rather than substitutes for) the principle of congestion charging. As a result, TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate as a result of representations under this theme.
- 5.2.8 One suggestion put forward was that a pilot scheme should be considered, either using a smaller zone within London, or implementing a similar scheme outside London. TfL considers that a separate pilot is unnecessary, as the proposed scheme relies on integrating proven technology rather than developing new systems which would need extensive trialling. Furthermore, congestion charging is proposed for London not as an academic or experimental exercise, but rather as the best known means of tackling congestion which is more widespread and intense in central London than elsewhere. The boundary for a central London charging zone was identified by the independent ROCOL group as the Inner Ring Road. This provides a suitable and easily recognisable boundary to the charging zone as well as a natural route for traffic wishing to divert around the proposed charging zone to avoid the charge.

Theme 3: The boundary of the charging zone

- 5.2.9 Representations and objections falling within this theme concern the proposal to use the Inner Ring Road as the defining boundary of the proposed scheme. Some representations suggested that the charging zone be increased to incorporate all of the inner and central London Borough areas, or alternatively extended eastwards towards the Blackwall Tunnel, or westwards to embrace the Royal Borough of Kensington and Chelsea. Other representations argued that the charging zone should be smaller or at least exclude the area to the south of the Thames. In addition to this, representations received included local requests to alter the boundary route to include or exclude certain roads adjacent to the Inner Ring Road. Specific representations received related to Kennington Lane and Tower Bridge, suggesting that these areas should be excluded from the diversionary route (Inner Ring Road), preferring in the case of Kennington Lane an alternative route including Kennington Oval and Kennington Park Road and Harleyford Road.
- 5.2.10 Following consideration of these representations and detailed on-site inspections of the proposed boundary, TfL does not consider that the proposed charging zone should be reduced or extended beyond the Inner Ring Road at this stage, as this would be beyond the scope of that proposed in the Mayor's Transport Strategy and would be more difficult to implement. In addition, public transport provision outside of the proposed charging zone, particularly to the east, is currently not as well developed and thus provides less scope to accommodate those who would wish to transfer to public transport.

- 5.2.11 Furthermore TfL has considered the Kennington Lane suggestion in detail and concludes that it is not desirable in traffic management terms. TfL also considers that it would not provide the traffic relief being sought by objectors as Kennington Lane carries significant levels of local traffic.
- 5.2.12 TfL proposes that no change is appropriate to the proposed scheme as a result of representations under this theme. Separately, TfL is proposing, subject to consultation, a minor modification to the charging zone boundary at Mount Street, off Park Lane, to accommodate vehicles entering Mount Street purely to refuel at the filling station on Park Lane, and avoid unsafe driver manoeuvres.

Theme 4: Days and hours of operation

- 5.2.13 Representations and objections falling within this theme concern the proposed days and hours of operation of the congestion charging scheme being Monday to Friday, 7.00am to 7.00pm, excluding public holidays. Representations received suggested both longer and shorter charging hours, charging during peak hours only, charging at weekends, and the need for greater consistency with current parking regulations. Concerns were also raised about the impact of a 7.00pm finish on London's evening leisure, tourism and various entertainment interests, and impacts on shift workers with suggested alternative finish times ranging from 5.00pm to 6.30pm.
- 5.2.14 TfL considers that extensions to the operating times of the proposed scheme (such as charging in the evenings, or at weekends) would yield limited additional reduction in congestion, yet would reduce the public acceptability of the proposed scheme by charging at a time when public transport is less well provided and less attractive as an alternative to car travel. TfL also considered representations suggesting the restriction of charging to peak periods. In this regard, TfL has noted that congestion in central and inner London is not confined to peak times only and application of the £5 central area licence fee during peak periods would only be half as effective in terms of the level of traffic reduction achieved in the proposed charging zone, compared with the hours of the proposed scheme (i.e. 7.00am – 7.00pm).
- 5.2.15 TfL's consideration of the above representations takes account of the potential advantages that changes to the charging hours might bring to certain sectors of the central London economy and to some shift workers. As a result, TfL considers that an adjustment to the charging hours is appropriate so that charging applies from 7.00am to 6.30pm rather than 7.00am to 7.00pm. TfL proposes, subject to consultation, a modification to the Scheme Order be made to accommodate this adjustment. If necessary in the light of experience and ongoing monitoring of scheme impacts, further adjustments may be made subject to the statutory procedures.

Theme 5: Level of charge

- 5.2.16 Representations and objections falling within this theme concern the level of the proposed £5 daily charge. Representations received included suggestions that the proposed £5 charge was too low or too high, or that higher or zero charges should be applied to commercial vehicles. Representations were also received which argued for a graduated

or incremental charge, with some arguing that it should be based on a zonal system. Others raised concerns about possible future increases in the level of charge.

- 5.2.17 TfL's consideration of the above representations takes account of earlier consultations and studies on the effectiveness of various levels of charge. In accordance with the ROCOL findings, TfL considers that a £5 daily charge would be effective and would be generally regarded as fair. TfL does not consider that it should discount for period licences at this stage. However, the monitoring programme would assess the impacts of the proposed scheme and would investigate any particular issue that might arise. Adjustments to the proposed scheme, including the level of charge, may be considered at a later date if they were needed to improve its performance or secure the objectives of the Mayor's Transport Strategy, and would be subject to the statutory procedures.
- 5.2.18 TfL proposes that no change to the scheme proposals or modifications to the Scheme Order is appropriate as a result of representations under this theme.

Theme 6: Scheme operation

- 5.2.19 Representations and objections falling within this theme concern the operation of the proposed scheme, and include concerns regarding the enforcement and appeals procedures, levels of penalty charges, the clamping/removal processes, registration processes, refunds, hirer liability, the minimum licence period for the residents' discount, and data protection issues.
- 5.2.20 In many cases the representations raised issues for which TfL had already made provision (such as the need for enforcement and penalties for evaders, and the importance of having a just and transparent appeals process). Also, many representations referred to matters already covered under the relevant legislation (such as the provision for vehicle hiring companies to dispute penalty charge notices by providing details of the hirer).
- 5.2.21 Representations were also received on the issue of the £10 post payment surcharge, with respondents suggesting that this should be removed from the proposals and that the charge should remain at £5 until midnight on the day of travel, at least for commercial vehicles. TfL's response refers to the proposed arrangements for fleet accounts, which include a feature which means that the £10 surcharge for payment after the proposed charging hours end would not apply for vehicles registered on the fleet account system. However, TfL has recognised that there is merit in delaying the introduction of this surcharge until after 8.00pm to allow the spreading of payments at the end of charging hours, and TfL proposes that a modification be made in order to accommodate this change.
- 5.2.22 Some representations expressed concern about the potential for abuse of the proposed discounts and exemptions system. Although TfL would adopt rigorous enforcement measures to safeguard the proposed scheme from abuse, TfL considers that some small adjustments are required for the operation of the proposed scheme to improve compliance and discourage fraudulent use of discount or exemption categories. Specifically, TfL proposes, subject to consultation, that the Scheme Order be modified so that residents be limited to registering one vehicle for a discount at any one time, and that any improper applications for additional vehicles be deemed void.

Theme 7: Use of net revenues

- 5.2.23 Representations and objections within this theme relate to Annex 2 of the Scheme Order. In accordance with the legislation, this annex sets out the proposed transport schemes and measures on which it is proposed the net revenues from the scheme would be spent.
- 5.2.24 Many representations received under this theme suggested that all net revenues should be spent on public transport improvements in Greater London. Respondents also tended to identify specific areas of expenditure that should be given priority or which were referred to specifically in Annex 2 to the made Scheme Order; for example, improved facilities for freight distribution, improved accessibility, and improved facilities for walking and cycling.
- 5.2.25 The net revenues, by law, must be spent on transport proposals that conform to the Mayor's Transport Strategy. TfL has developed a ten year General Plan for applying the net proceeds. These would be allocated across Greater London and not limited to the proposed charging zone. TfL proposes that a statement be added to the Scheme Order, confirming that the General Plan for the spending of the net proceeds from the proposed scheme has been submitted by TfL to the Secretary of State for approval.
- 5.2.26 A large number of representations suggested that the hypothecation period for the spending of the net revenues be extended beyond ten years. TfL understands and supports the Mayor in lobbying of the Government for an extension on the ten year hypothecation period.

Theme 8: Payment method

- 5.2.27 Representations included within this theme relate to TfL's proposed arrangements for fleet operators, alternative payment methods (including electronic and decrementing systems), and concerns about the convenience and accessibility of licence purchase.
- 5.2.28 For representations suggesting alternative payment methods, TfL's response takes account of the decision to base the proposed scheme around existing and proven technology. More sophisticated electronic road pricing systems would both require extensive development and trialling and would be impossible to implement within the Mayor's preferred timetable. To improve access to the proposed scheme, however, TfL proposes, subject to consultation, that a facility for purchasing 'Carnet' tickets be introduced, which would enable users to purchase in advance undated licences which would then be validated on a particular day.
- 5.2.29 As a result of the representations regarding fleet operators, TfL has developed new arrangements that it is proposing, subject to consultation, be incorporated as a modification to the Scheme Order. TfL is proposing separate arrangements be introduced for goods vehicles and for cars and light vans. A decrementing account based system is proposed for goods vehicles, which would involve operators pre-registering vehicles and paying a slightly higher daily charge (£5.75). Operators of cars / light van fleets would be able to register their fleets in advance, and confirm which vehicles had been present in the charging zone at the end of the account period. The proposals include leased and hired vehicles and would require registration of at least 25 vehicles. The facility would allow TfL

to charge up to 115% of the standard daily charge and would include an initial charge of £10 per vehicle. TfL considers that there should be no other major changes to the payment methods set out in the Scheme Order, but acknowledges that this is a matter that should be kept under review.

- 5.2.30 In response to the representations regarding licence purchase, TfL confirms that it would ensure that there would be a wide variety of payment channels, should the Mayor confirm the Scheme Order. In addition, TfL proposes that the prepayment period for purchasing licenses be extended to 65 days, as a modification to the Scheme Order, subject to consultation.

Theme 9: Project timetable

- 5.2.31 Representations and objections falling within this theme concern the proposed timetable for the introduction of the proposed scheme with an earliest start date (envisaged in July 2001) of January 2003. Representations focused on whether the timetable to introduce the proposed scheme is feasible, considering the lead-times required for traffic management and complementary transport measures.
- 5.2.32 TfL remains satisfied of the feasibility of the broad timetable for the introduction of congestion charging, but acknowledges that the dates would be extended by up to 2 years should the Mayor decide to hold a Public Inquiry. Following the latest assessment of the time, which would be required to develop and implement the proposed scheme. TfL proposes, subject to consultation, that a modification be made to the Scheme Order, that the date for the start of charging and its associated enforcement be changed from 14 months after confirmation of the Scheme Order to 12 months after confirmation, therefore the earliest start date would be February 2003.

Theme 10: Consultation and Public Inquiry

- 5.2.33 Many of the representations and objections under this theme related to concerns that the consultation arrangements, the time allowed for consultation or the information provided with the Scheme Order, were inadequate. Some respondents commented on a lack of information in accessible formats, and queries were also received concerning publication of the consultation report. A number of representations were received from stakeholders claiming that they had not been sufficiently involved with the development of various aspects of the proposals. Others argued that there should be a public inquiry into the proposed scheme.
- 5.2.34 TfL's response outlines what it considers to be a thorough and comprehensive consultation process, pointing to extensive publicity surrounding the proposals (including street notices, newspaper coverage, radio advertisements, leaflets and an advertised freephone information line); and the provision of detailed plans and information at a public exhibition, public meetings and on the internet. TfL undertook extensive consultation with over 300 interested groups and stakeholders. All responses to the consultation have been considered, including those received after the official closing date. Moreover, prior to consultation on the Scheme Order, there had been an extensive public consultation on the draft of the Mayor's Transport Strategy.

- 5.2.35 TfL's response also details TfL's subsequent dialogue with those stakeholders who complained that they had been insufficiently involved, and attempts to account for specific instances where stakeholders feel insufficient consideration was given to their input, (such as the concern among certain London Boroughs over traffic modelling).
- 5.2.36 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to the representations received under this theme.
- 5.2.37 TfL considers the specific issue of a public inquiry in detail in chapter 15 of this report.

Theme 11: Discounts and exemptions – General

- 5.2.38 A number of representations, mainly from members of the public, suggested that there should be no discounts or exemptions from the proposed scheme; or those discounts and exemptions are kept to a minimum. It was also suggested that discounts and exemptions be awarded to a person and not a vehicle.
- 5.2.39 While the overriding objective of the proposed scheme is to reduce congestion, TfL recognises that some people especially those with mobility difficulties, could face a real difficulty in switching to public transport from the car. Furthermore, certain essential public services rely upon workers travelling into the proposed charging zone by car or van in the course of their work duties, and TfL considers that some exemptions or discounts are warranted.

Theme 12: Discounts and exemptions – Motorbikes and mopeds

- 5.2.40 Representations and objections included in this theme expressed varying degrees of concern around the exemption from charges for motorcycles. Some opposed any form of discount or exemption for powered two-wheelers, while others argued for a reduced charge; many citing environmental and safety concerns for their resistance to a total exemption.
- 5.2.41 TfL considers that the proposed exemption for motorcycles is justified on the basis that they contribute less to congestion than other vehicles. It is also pertinent to note that motorcycles are more difficult to enforce with camera technology compared with other vehicles. Should the proposed scheme be introduced, the level of accidents involving motorcycles would be monitored carefully, and their exempt status reviewed if necessary.
- 5.2.42 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to representations and objections received under this theme.

Theme 13: Discounts and exemptions – Certain military vehicles

- 5.2.43 Representations and objections based on this sub-theme focused entirely on Ministry of Defence vehicles. It was requested that the proposed discount for operational vehicles be extended to cover conventional commercial and other vehicles.
- 5.2.44 TfL does not consider it appropriate to offer a wider discount and remains of the view that the discount should only apply to operational military vehicles. TfL proposes that no

change to the scheme proposals or modification to the Scheme Order is appropriate in response to representations and objections received under this theme.

Theme 14: Discounts and exemptions – Alternative fuel vehicles

- 5.2.45 Representations and objections included in this theme ranged from objections to the proposed discount for alternative fuel vehicles (mainly on the ground that vehicles cause congestion regardless of their fuel type), to concern over the eligibility criteria for the discount, (with many representations arguing for a wider definition including dual-fuel or clean diesel vehicles). Others argued that the proposed geographical restriction should be widened to enable eligible motorists living outside Greater London to claim the 100% alternative fuel discount.
- 5.2.46 TfL considers that although the primary goal of the proposed scheme is congestion reduction, a discount to encourage the use of greener fuels by adopting very high standards of emissions would advance other Mayoral priorities relating to air quality and sustainability. TfL therefore maintains the view that discounts for alternative fuel vehicles are desirable. In accordance with this position, and as a result of the representations and objections received, TfL proposes, subject to consultation, a modification to the Scheme Order that the eligibility criteria for the definition of alternative fuel vehicles be amended to include bi/dual fuel gas propelled vehicles as well as hybrid electric and fuel cell vehicles, registered or eligible to be registered to specific groups in the Transport Action Power Shift database, proving that they meet strict and enforceable emissions standards. In addition, TfL proposes, subject to consultation, a modification to the Scheme Order to the effect that the geographical restriction to Greater London be removed, in order that any eligible vehicle registered in the UK can claim the alternative fuel discount.

Theme 15: Discounts and exemptions – Black cabs

- 5.2.47 Representations and objections included within this theme focused mainly on the justification of a discount for black cabs, with a number of representations suggesting that taxis should not be exempt.
- 5.2.48 TfL considers that licensed taxis make an important contribution to London's public transport system, enabling a wide variety of users (including the disabled) to make short trips efficiently and providing a vital alternative to private car use.
- 5.2.49 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to representations and objections received under this theme.

Theme 16: Discounts and exemptions – Borough operational vehicles

- 5.2.50 Representations and objections included in this theme fall into two broad categories. Firstly, a number of representations argued that offering a 100% discount to local authority operational vehicles while charging commercial vehicles (which in some cases would be performing similar or identical functions as local authority vehicles, possibly under contract to a Borough) would be illogical and inequitable. Many suggested that parity should exist between public and private sectors, so that broadly equivalent vehicles operating within each sector were either all exempt, or all subject to the charge.

- 5.2.51 A second broad group of representations argued that the eligibility criteria entitling certain local authority vehicles to a 100% discount should be widened to cover additional functions carried out by London Boroughs. A representation was also made requesting that vehicles operated by the Royal Parks Agency should receive a 100% discount, as the Agency undertakes functions within the parks inside the proposed charging zone comparable to those carried out by local authorities outside the parks.
- 5.2.52 TfL considers that the proposed discount for local authority operational vehicles is justified. Although the functions they perform may in some cases be similar to those undertaken by commercial vehicle users, the majority of defined uses are not and the distinction remains that local authorities are first and foremost providing core, public and statutory services to the locality. TfL proposes no widening of the definition of 'operational functions' set out in the Scheme Order as a consequence of the representations and objections received under this theme. As a result of the representations and objections received, TfL proposes, subject to consultation, a modification to the Scheme Order so that the proposed limit on the number of local authority operational vehicles eligible for the 100% discount should be removed. The limit is now considered inappropriate due to the existence of other safeguards. TfL also proposes a modification to the Scheme Order, subject to consultation, that the Royal Parks Agency's operational vehicles be allowed a 100% discount, given the comparability of their functions to those of local authorities.

Theme 17: Discounts and exemptions – Breakdown and recovery vehicles

- 5.2.53 Representations and objections included within this theme argued for a wider definition of breakdown and recovery vehicles, and objected to the geographical restriction of the 100% discount for breakdown and recovery vehicles to those registered and operated from within Greater London.
- 5.2.54 As a result of the representations and objections received, TfL proposes that the eligibility criteria for the 100% discount be modified in the Scheme Order, subject to consultation, to include a wider range of breakdown and recovery vehicles constructed, adapted or equipped to provide roadside assistance or recovery services and operated by an accredited recovery organisation. This recognises the vital role they have in clearing the streets of congestion by removal of broken down vehicles. In addition, TfL proposes, subject to consultation, that the Scheme Order be modified so that the geographical restriction of the discount to Greater London be removed.

Theme 18: Discounts and exemptions – Vehicles used by disabled persons

- 5.2.55 Representations and objections included within this theme focused on a number of concerns including: the eligibility criteria for receiving a discount; the geographical restriction of the discount to residents of Greater London; potential abuse of the Blue Badge scheme; the £10 annual registration fee; the level of discount; and the restriction on the number of vehicles to be nominated for a discount.
- 5.2.56 TfL's response includes references to earlier consultations and earlier studies, and follows a consideration of the feasibility and operational impact of using alternative criteria to define eligibility for the discount. As a result of the representations and objections received, TfL proposes, subject to consultation, that the Scheme Order be modified so

that the restriction on the 100% discount for Blue Badge holders to Greater London residents should be removed to avoid discriminating against disabled persons from outside Greater London and to extend the discount and exemptions for Blue Badge holders to EU citizens or vehicles from Member States of the EU or European Economic Area. This would be through a modification to the Scheme Order, subject to consultation.

Theme 19: Discounts and exemptions – Emergency services vehicles

- 5.2.57 Representations and objections included within this theme concern the proposed geographical restriction of the discount to vehicles registered and operated from within Greater London and the need to include other 'emergency services' operating within Greater London.
- 5.2.58 In order to ensure a consistent definition of emergency service vehicles, TfL proposes, subject to consultation, that some modifications to the Scheme Order are appropriate. TfL proposes that lifeboat haulage vehicles, HM Coastguard vehicles and Port of London Authority operational vehicles be included within the 100% discount category for emergency services operational vehicles. In addition, TfL is proposing an exemption from the charging for certain lifeboat vehicles exempt from VED. TfL proposes that the geographical restriction of these discounts and exemptions to Greater London be removed.

Theme 20: Discounts and exemptions – Public service vehicles

- 5.2.59 A number of representations and objections included within this theme opposed the proposed restriction of the discount for Public Service Vehicles (PSVs) to those, which have 17 or more seats. Some argued that all PSVs helped keep private vehicles off the road and should therefore qualify for a discount. Concerns were also raised that the 17-seat requirement would mean that minibuses used by voluntary and other non profit-making organisations would have to pay the congestion charge. Other representations questioned the justification for exempting certain vehicles such as tourist coaches.
- 5.2.60 As a result of the representations and objections received, TfL proposes, subject to consultation, that the eligibility criteria for the 100% discount be modified in the Scheme Order to include public service vehicles with 9 or more seats and to include those vehicles used by voluntary and other non profit-making organisations (operating under Section 19 or 22 permits).

Theme 21: Discounts and exemptions – Royal Mail vehicles

- 5.2.61 Representations expressed concern about the equity of the 100% discount for utility providers such as Royal Mail vehicles and the impact that this would have upon competition in the market for the provision of postal services in central London.
- 5.2.62 TfL's response took into account the representations received, and the recommendation made by the postal regulator, the Postal Service Commission, that in order to avoid competitive distortion, the discount for liveried Royal Mail vehicles should be removed. TfL therefore proposes, subject to consultation, that the Scheme Order be modified to remove the 100% discount for liveried Royal Mail vehicles.

Theme 22: Discounts and exemptions – Residents' vehicles

- 5.2.63 Representations included within this theme concern the proposed level of the discount for residents' vehicles (with many representations arguing that residents should be entirely exempt); the proposed £10 annual registration fee for residents wishing to claim a discount; the justification for the discount; the definition of a 'resident'; concern about potential abuse of the registration process; and the impact on businesses located in the proposed charging zone.
- 5.2.64 TfL's consideration reiterated that the reduction of traffic congestion is the overriding objective of the proposed scheme, and that the imperative to discourage unnecessary car journeys applied to residents within the proposed charging zone as well as those travelling into central London from elsewhere. TfL considers the discount appropriate, as most residents with cars living in the proposed charging zone do contribute to congestion and are not in a position to avoid the charge. Many already pay for a residents parking permit from their local authority.
- 5.2.65 However, TfL proposes some modifications to the Scheme Order, subject to consultation, in order to safeguard against fraudulent use of the proposed scheme. These include a restriction of the residents' discount to those residents aged 17 years or over, a restriction to prevent residents registering more than one vehicle at any one time, and a provision that any discounted residents' licences be deemed void if they are purchased by persons not entitled to do so.

Theme 23: Discounts and exemptions – New proposals

- 5.2.66 Representations grouped within this theme concern requests for new exemptions and discounts. Suggestions included: concessions for commercial and business vehicles; diplomatic vehicles; private hire vehicles (minicabs); utility company vehicles; hire cars; 'Smartcars'; residents living outside but near the charging zone boundary; car share clubs; the elderly; those travelling to central London hospitals; those on low incomes; MPs; workers in the charging zone; 'key workers'; NHS workers; firefighters; rail workers; carers and charity workers; shift workers; market workers; religious workers and those visiting religious institutions; parents travelling with children; and commuters travelling against the peak flow. Others suggested that discounts and exemptions be restricted to those without a public transport alternative, or those who could prove a 'need' to be in the proposed charging zone.
- 5.2.67 TfL's position is that the primary function of the proposed scheme is the reduction of traffic congestion. Discounts and exemptions undermine the decongestion benefits of the proposed scheme, and should be reserved to mitigate the costs of compliance for those who, for various reasons, are unable to transfer to public transport and who need to travel within the proposed charging zone for important reasons of public service and in the course of their work duties.
- 5.2.68 TfL's response also refers to the improvements in public transport, which would help provide a viable alternative to private vehicle travel for many of those groups and individuals that seek a discount or exemption.

- 5.2.69 Other representations sought exemptions or discounts for people connected with groups already covered by other concessions (typically those visiting charities, disabled people, or the elderly), and in most cases TfL does not consider further discount either appropriate or practical (due to the difficulties of identification of essential journeys and enforcement).
- 5.2.70 However, as a result of the representations and objections received, TfL proposes that the Scheme Order is modified, subject to consultation, to include the following new discount categories: private hire vehicles (minicabs), vehicles of NHS staff who are required to use their car to carry controlled drugs and other specified materials, and firefighters who are required to use their car to travel between London fire stations for operational purposes.

Theme 24: Traffic and transport modelling

- 5.2.71 Representations included within this theme tended to be critical of TfL's projections regarding the traffic impacts of the proposed scheme. Some representations challenged the general accuracy of the modelling method used, while others queried the projections with regard to specific localities or specific categories of vehicle. Others suggested specific factors which they urged TfL to consider when modelling traffic changes.
- 5.2.72 TfL considers that its use of a range of computer models, of differing emphasis and purpose allows it to develop high and low sensitivity estimates and appreciation of the consequences of car users switching to public transport or car drivers avoiding the charging zone by diverting to other routes. TfL has addressed specific queries or challenges by providing further details of the assumptions underpinning the modelling work, and the reasoning behind decisions informing the analysis. TfL continues to apply various modelling techniques in order to assist its assessment of the likely impacts of the proposed scheme, and support the development of the associated complementary transport measures and traffic management strategy, in readiness for a decision by the Mayor on the Scheme Order.
- 5.2.73 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to representations and objections received under this theme.

Theme 25: Impacts monitoring

- 5.2.74 Representations and objections under this theme include: arguments that TfL should conduct monitoring and impact analysis before and during implementation of the proposed scheme; and concerns over the following: use of monitoring data; the transparency of the proposed scheme; the need to be responsive to monitoring results and make modifications to the scheme accordingly. In addition to this, concerns have been raised over the methodology to be employed and the targeting of particular groups or factors.
- 5.2.75 TfL refers to the comprehensive impacts monitoring programme currently in progress involving collection of baseline data to provide a definitive picture of conditions before the introduction of the proposed scheme. TfL recognises that an effective and comprehensive monitoring programme requires ongoing close collaboration with numerous stakeholders and will need to retain flexibility to respond to particular issues as they arise. The Mayor has stated his commitment to changing the proposed scheme if it is not functioning as

intended. Furthermore, results from the monitoring would be published and any significant modifications to the proposed scheme would be subject to public consultation.

- 5.2.76 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to representations and objections received under this theme.

Theme 26: Complementary transport measures

- 5.2.77 Representations and objections included under this theme relate to concerns surrounding the provision of public transport alternatives to car travel. Many representations voiced the opinion that public transport alternatives to car travel should be improved prior to the introduction of congestion charging; others expressed doubt that the necessary improvements would be possible in the time available, while others argued that the proposed improvements were, in any case, inadequate. In particular, concerns were expressed about the capacity of the National Rail and Underground systems to cope with any additional demand and various alternative or additional complementary transport suggestions were put forward.
- 5.2.78 TfL's response refers to the extensive modelling work which has been done. The results of this work suggest that the planned programme of measures would be more than sufficient to cope with the additional demand on the public transport network as a result of congestion charging, and that these measures can and would be implemented before the introduction of the proposed scheme. TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to representations and objections received under this theme.

Theme 27: Associated traffic management measures

- 5.2.79 A number of representations and objections were received which suggested that the potential benefits of the proposed scheme, for businesses and residents, are potentially overstated. Specific concerns related to the adequacy of proposed traffic management arrangements including around boundary points, the operation of the Inner Ring Road, signage, and the reallocation of parking zones in and around the proposed charging zone.
- 5.2.80 TfL considers that the proposed scheme would reduce congestion and thus improve journey times and reliability for vehicles inside and beyond the proposed charging zone. The monitoring programme currently underway and being developed by TfL pays particular attention to the impacts on business both generally and focussing specifically on those activities experiencing disproportionate impacts. The Mayor has stated that the proposed scheme, if introduced, would be considered in light of the results obtained from the monitoring programme and be subject to constant review.
- 5.2.81 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to the representations received under this theme. However, TfL is separately proposing, subject to consultation, a modification to the proposed hours of operation; this could assist those who are concerned about the potential impact of the scheme on controlled parking zones.

Theme 28: Impacts – business

- 5.2.82 Representations and objections under this theme included suggestions that the potential benefits to businesses of the proposed scheme have been over-stated and the likely costs to local businesses under-estimated. Potential impacts cited included increased costs and loss of business, and the relocation of business. Specific local issues were discussed including the impact on the entertainment industry, the 'City Fringe' and the central London markets, tourism, courier businesses, regeneration areas and small businesses.
- 5.2.83 TfL considers that the proposed scheme would reduce congestion and thus improve journey times and reliability for vehicles inside and beyond the proposed charging zone. The monitoring programme being developed by TfL would pay particular attention to the impacts on business, as this is currently an area of a degree of uncertainty. TfL considers, however, that adverse impacts on businesses are unlikely to be significant.
- 5.2.84 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to the representations received under this theme, save for those modifications concerning the hours of operation and their possible adverse impact on the entertainment industry.

Theme 29: Impacts – environmental

- 5.2.85 Representations and objections under this theme included concerns that the proposed scheme would give rise to local environmental, air quality and noise pollution problems, particularly on the Inner Ring Road, and particularly with regard to the increased volume of buses; and that the street furniture associated with the proposed scheme would cause visual pollution.
- 5.2.86 The proposed scheme is not expected to create any significant adverse environmental impacts. There would be no material damage in air quality, either locally, outside, or across the proposed charging zone; although it is considered that there would be a small net reduction in the emission of key pollutants as a result of reduced traffic and congestion. The Mayor's draft Air Quality Strategy separately proposes measures for reducing the emissions of, in particular, buses and goods vehicles, and these measures are expected to significantly improve air quality in Inner London over the timescale of the proposed scheme.
- 5.2.87 In response to concerns about localised traffic congestion around the Inner Ring Road, TfL considers its plans to use sophisticated traffic signal control systems are able to respond to and effectively manage projected levels of congestion, in order to mitigate any localised adverse impacts.
- 5.2.88 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to the representations received under this theme.

Theme 30: Impacts - social/economic

- 5.2.89 Representations and objections under this theme included suggestions that the proposed scheme would be inequitable, would result in community severance, an increase in the

cost of living within the charging zone and a decrease in the quality of life for residents. Some respondents commented that the proposed scheme runs contrary to the Mayor's policy on social inclusion, and particular concerns were raised about the impact upon vulnerable groups and the provision of health care in the proposed charging zone.

- 5.2.90 TfL considers that the proposed scheme would have substantial economic and social benefits for London, and that the reduced congestion and scope for improved amenity resulting from the proposed scheme would help offset the concerns regarding community severance and cost. Money raised via congestion charging would be reinvested in to public transport improvements in line with TfL's General Plan. The resulting transport improvements are expected to contribute towards increased social inclusion.
- 5.2.91 Should the Mayor confirm the Scheme Order, a comprehensive programme would be established to monitor the social and economic impacts of the proposed scheme in order that any presently unforeseen adverse effects can be identified and addressed.
- 5.2.92 However, TfL acknowledges the concerns regarding the impact of the proposed scheme on the provision of health services, and as a result of these representations and those from other themes, TfL proposes, subject to consultation, that the Scheme Order be modified so that certain NHS shift workers who have to use their private car for work be eligible for a 100% discount from the proposed scheme, and that the charging hours be 7.00am to 6.30pm rather than 7.00am to 7.00pm.

Theme 31: Impacts – traffic

- 5.2.93 A substantial number of representations raised the concern that the proposed scheme would simply displace traffic from within the proposed charging zone to areas adjacent to the charging zone boundary. Other representations expressed doubts about the efficacy of the proposed scheme in reducing congestion, and / or concerns about increased congestion outside the charging hours proposed, and 'rat running' or congestion outside and around the proposed charging zone. Particular local issues were raised concerning the potential impacts on residential streets, London parks, pedestrian and cyclist safety, and the possibility of increased parking stress at stations and in areas adjacent to the proposed charging zone.
- 5.2.94 TfL considers that the traffic changes resulting from the proposed scheme would be manageable, and measures would be implemented to effectively deal with any adverse impacts. The proposed traffic management scheme is expected to reduce radial traffic (by deterring some of those drivers who currently drive into the charging zone from outside), while increasing net orbital traffic, as some drivers who would have otherwise driven through the proposed charging zone divert around it. Overall, there is expected to be a reduction in traffic both inside and outside of the proposed charging zone.
- 5.2.95 The Inner Ring Road is expected to cater for much of the traffic diverting around the proposed charging zone, and TfL is proposing a computer-controlled dynamic boundary management system to ensure that this major route would be able to accommodate the projected increase. TfL considers that the proposed system is an improvement on the existing traffic management systems.

- 5.2.96 A total budget of £100m has been identified for traffic management works to support the proposed scheme and mitigate any adverse impacts, particularly in the areas adjacent to the boundary of the proposed charging zone. Some of the budget has been held over to allow further measures to be implemented after the proposed scheme, if introduced, has become operational. Also, a rigorous monitoring programme is proposed to identify any instances where the operation of the proposed scheme leads to environmental or social pressures.
- 5.2.97 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to the representations received under this theme.

Theme 32: Technology

- 5.2.98 Representations and objections included under this theme relate to concerns that the technology, computer systems and the telephone call centres would not be able to cope with the demands of such a scheme. Concerns were also raised about the ability to enforce against foreign registered vehicles and unregistered vehicles. Other comments included concerns that the proposed technology is not sufficiently advanced, and concerns about the capacity of the systems and their testing in advance of the proposed scheme 'going live'.
- 5.2.99 The technology underpinning the proposed scheme is both proven and practical. One of the key features of the proposed technical enforcement solution is that it relies upon existing technology rather than new and untested systems. TfL has assessed the potential scale of the various systems necessary and the implementation programme allows for each of the systems to be thoroughly tested before the proposed scheme comes into operation.
- 5.2.100 TfL acknowledges that, as with any scheme involving vehicle enforcement, foreign-registered vehicles can prove problematic, as vehicle details are not easily accessible to UK authorities. However, the proposed scheme is envisaged to have a capability to obtain owner details of foreign vehicles so that persistent foreign offenders would be just as liable for clamping and removal as domestic offenders.
- 5.2.101 TfL proposes that no change to the scheme proposals or modification to the Scheme Order is appropriate in response to the representations received under this theme.

Chapter 6: Developments since the July 2001 consultation - scheme proposals and the Scheme Order

6.1 Introduction

- 6.1.1 This chapter provides details of those factors that have influenced the development of the Scheme Order since July 2001 other than the representations and objections received during the two consultation exercises. It gives an indication of the additional technical research and trialling which underpins the scheme proposals, as well as outlining various other developments which have affected the Scheme Order.
- 6.1.2 The further detailed design of the proposed scheme, and hence TfL's final consideration of the Scheme Order, has been informed by various trials and exercises. These include a programme of trials of the Automatic Number Plate Recognition system and an exhaustive Technical Design Study (TDS) undertaken to ensure the robustness of each element of the scheme and camera design. The TDS was accompanied by rigorous bidding and assessment procedures for the procurement of the core services. The core services include image management, licence sales, enquiries, Penalty Charge Notice (PCN) processing and discount registration.
- 6.1.3 The Scheme Order proposed for confirmation also includes modifications proposed as a consequence of other considerations, including changes to the potential programme, various refinements to the operation of the proposed scheme, updated information, correction of errors and omissions, and improvements to the clarity and structure of the Scheme Order.

6.2 Automatic Number Plate Recognition Trials

- 6.2.1 A preliminary pilot study of the Automatic Number Plate Recognition (ANPR) system was carried out in November 2000. This assessed the suitability of ANPR as the primary enforcement tool for the proposed scheme. It did so by testing a variety of ANPR systems from a selection of suppliers. The study addresses the recommendation of the independent ROCOL group that there should be trials to assess the effectiveness of ANPR equipment in a central London context.
- 6.2.2 A supplementary pilot study was completed in July 2001. This was based on the conceptual design and procurement strategy developed from the preliminary study. It assessed a range of site, environmental and operational factors influencing the performance of various ANPR configurations. The ANPR systems were located at a TfL building, connected by a telecommunications network to the trial sites, utilising a number of different camera types mounted on conventional CCTV camera columns. The results of this supplementary pilot study informed the procurement, implementation and commissioning stages of the project.
- 6.2.3 The results of both studies, and ongoing trialling since July 2001, support the assessment that the selected camera enforcement system would deliver the performance levels necessary to enforce the proposed congestion charging scheme.

6.3 Procurement and Technical Design Study (TDS)

- 6.3.1 The process for procuring the infrastructure and services necessary to support the proposed scheme was designed to ensure the delivery of a robust and reliable set of integrated systems. In support of this goal, an overall scheme design was developed which focussed on integrating proven technologies rather than developing new solutions. In addition, bidders were required to demonstrate and test their systems as part of the bidding process.
- 6.3.2 The procurement was structured into groups in order that, by bundling together related aspects of the proposed scheme, the prospective suppliers were presented with a range of opportunities that best suited their ability to respond. The principal advantage of this approach, over the alternative of seeking bids for a single contract for all services, is that TfL retains the opportunity to choose the suppliers of those elements of the procurement which would have otherwise been sub-contracted by the main supplier.
- 6.3.3 This has enabled TfL to assemble 'best of breed' solutions, rather than run the risk of a chosen principal supplier outsourcing to sub-optimal sub-contractors. This approach has also allowed the different suppliers to respond productively, with main suppliers putting together a series of linked bids for a range of packages – as was the case with both short-listed bidders for the 'core services', 'image management' and 'retail sales' streams. This approach also offered a reduction in integration risk to TfL.
- 6.3.4 Following detailed process mapping, and the definition of front and back office functions, a prototype 'model office' was developed to simulate, test and develop key elements and processes of the proposed scheme design. From this, TfL developed a detailed Statement of Requirements, which was structured so as to define TfL's requirements clearly whilst still leaving scope for suppliers to create their own innovative solutions.
- 6.3.5 In general, the bids received for each procurement were analysed against a comprehensive scoring regime in three areas:
- general responses (bidder structure, plans, health and safety, etc);
 - technical responses (quality of IT system proposals, etc); and
 - commercial (pricing, acceptance of risk and responses to TfL's draft terms and conditions).
- 6.3.6 The bidders were also carefully assessed on the basis of the deliverability of their proposals within the project timescale and their responses at the bidder interviews.
- 6.3.7 The bid assessment and negotiation process for the procurement of the fibre optic telecommunications network established that no single supplier could meet TfL's requirements without exceeding TfL's tolerance of risk. As a result, TfL designed a dual-sourcing strategy for the fibre optics links between the cameras and the data centre housing the ANPR computer equipment. This is TfL's risk mitigation strategy in response to the deteriorating financial status of the telecommunications sector from the second half of 2001. The two providers (COLT and BT) will each provide roughly half of the network.

By way of additional safeguard, the 60 boundary points that carry some 70% of the network/ system traffic will be connected by both service providers.

- 6.3.8 The two short-listed bidders for the Core, Retail and Image contracts were required to undertake a technical design study (TDS), to ensure that each bidder could demonstrate that their proposed solution would meet TfL's requirements. This involved the translation of TfL's functional requirements for operation of the proposed scheme into demonstrable solutions, achieving set deliverables against a range of scenarios.
- 6.3.9 Detailed contractual and financial negotiations took place in parallel with the development of the Statement of Requirements and TDS in order to ensure that the contracts were tailored to performance targets relevant to each proposed technical solution.
- 6.3.10 The TDS had the following objectives:
- to understand and mitigate the technical risk of delivering any proposed solution;
 - to demonstrate the technical and process capabilities of the bidders to design, implement and operate the proposed solution;
 - to identify any potential impacts of the proposed solution on the intended operation of the proposed scheme;
 - to progress the development of the technical solution in order not to delay the overall project timetable;
 - to design and agree third party interfaces and relationships for design, build, test and operation of the proposed scheme; and
 - to provide information for the final evaluation of each bid.
- 6.3.11 The TDS involved a close working relationship between TfL and each of the two bidders independently in order to maximise the benefits of the experience and knowledge of all parties in devising a deliverable technical solution for potential implementation in early 2003. This included the creation of 'Bidder Support' teams of TfL personnel, who were based at each bidder's site to facilitate communication between the bidders and TfL during this critical phase of design.
- 6.3.12 Bidders provided the following outputs for evaluation:
- detailed technical documents covering all aspects of the design of each service (functional and technical) and the implementation/ delivery of each service process/ operation;
 - scenario demonstrations of the key capabilities of the service to be provided - 60 scenarios were demonstrated, including working software for many aspects of the solution; and
 - risk registers, containing the key risks and proposed mitigating actions.

6.3.13 Each of these areas were evaluated and scored against a set of preset criteria detailed below:

- documents were evaluated against completeness, quality, feasibility, risks and assumptions
- scenarios were evaluated by assessing the bidders success in demonstrating the expected outputs of each scenario and on generic criteria such as the presentation, ease of use and interface consistency
- risks were evaluated against the number and severity of outstanding risks at the end of the TDS phase and how successfully risk was mitigated during the course of the TDS phase.

6.3.14 In addition, bidders were assessed on general qualities, against the following criteria:

- ability to deliver against the TDS plan;
- ability to deliver within the project timescales;
- testing strategy quality;
- attitude to change and the change control process; and
- cross team collaboration.

6.3.15 Following the evaluation of the bidders' submissions and scenarios, TfL concluded that the objectives of the TDS were achieved. In addition to demonstrating robust and workable solutions, the TDS also enabled TfL to identify various improvements to the scheme design. TfL took these forward for consultation as proposed modifications to the Scheme Order. These modifications are outlined below.

Reducing fraud and abuse

6.3.16 The first category of modifications concerns measures to reduce potential fraud and abuse: such as the eligibility for residents' discount, improper payments, change of registered keeper, arrangements when discount eligibility ceases, limiting residents to one discounted vehicle at a time and limiting Blue Badge holders two discounted vehicles in any one day.

Responding to customers

6.3.17 The second category covers arrangements to allow greater flexibility and responsiveness to customer needs: such as longer periods for paying charges, a longer period following the end of charging hours for the payment of the charge at the standard £5 daily charge, the staggering of individual discount registrations, the availability of carnet payments, the ability to change previous charge payments and reducing the burden on the repeat discount registration for Blue Badge holders.

Processing of charges

- 6.3.18 The final category covers improved and more secure arrangements for the processing of payments: a minimum notice period between the receipt of a discount registration application and the date the discount comes into effect; an extended discount registration period; and a notice period for amendments to licences.

Technical Risks

- 6.3.19 The TDS process significantly improved the design and operation of the scheme and increased TfL's confidence in the feasibility of achieving an effective implementation in early 2003, if the Scheme Order were confirmed by the Mayor.
- 6.3.20 As a result of these studies, TfL is satisfied that the selected bidder should deliver and operate a scheme that will operate in conformity with the Scheme Order as proposed to be modified; that the processing systems will be reliable; that the enforcement systems will be fair and reasonable; that the project can be delivered within budget and in accordance with the latest proposed timetable. Should the Mayor decide to confirm the Scheme Order, the implementation programme includes extensive testing and proving requirements. TfL would advise the Mayor on the outcome of these tests and trials.

6.4 Miscellaneous Developments

Scheme start date

- 6.4.1 In the Scheme Order the date for the start of charging and its associated enforcement was set as 14 months after the confirmation by the Mayor. TfL now proposes, subject to consultation, that this be modified to 12 months after confirmation. This reflects the additional period of public consultation on proposed modifications to the Scheme Order and the progress that has been made since July 2001 with development and procurement of fully functional systems and services to deliver the proposed scheme.
- 6.4.2 Similarly, TfL proposes that the date for other parts of the Scheme Order coming into effect be modified to allow for the revised programme, which, if the Mayor confirms the Order in February 2002, envisages the earliest advance payment of charges and registration of discounts starting in October 2002 and the earliest date for charging to commence in February 2003. The reduction to 12 months between the Scheme Order confirmation and the scheme 'go live' date has been made possible by using the period of the additional consultation to undertake the detailed planning, development and trials which would have taken place had the contracts or call options been exchanged on the originally planned dates in early December 2001. However this reduced period is entirely dependent on no further delays being imposed and the approval from the Secretary of State for the Ten Year General Plan for the application of the net proceeds.
- 6.4.3 When the Scheme Order was made in July 2001 and sent to the Secretary of State it contained the required General Plan for the use of the net revenues over the opening ten years of the proposed scheme. The estimate of annual net revenues from the proposed scheme was £200 million per year, including the revenue from penalty charges. Further work, together with revisions to the cost profile of the proposed scheme following the

conclusion of negotiations for the main contracts, leads to a revised annual net revenue projection in the range of £130 million to £150 million, excluding surplus penalty charge revenues.

- 6.4.4 The lower point of this range has been used for business planning purposes and so TfL proposes subject to consultation, that the first paragraph of Annex 2 of the Scheme Order be modified to reflect this.
- 6.4.5 The Scheme Order cannot come into effect unless and until the General Plan has been approved by the Secretary of State. On 12 December 2001, Ken Livingstone in his role as Chair of TfL formally submitted for approval to the Secretary of State TfL's General Year Plan, as proposed to be modified in the Scheme Order. During December 2001 and January 2002 two meetings have been held between the Chair of TfL and Rt Hon John Spellar MP, Minister for Transport and there has been further correspondence requesting that the Secretary of State confirm that there are no aspects of the General Plan which cause the Secretary of State any concern, to confirm that there are no aspects of the proposed scheme which are likely to cause the Secretary of State to reject the General Plan, and to agree a timetable for approval for the General Plan in line with the Mayor's proposed timetable for implementation, should he decide to confirm the Scheme Order in February 2002.
- 6.4.6 The Secretary of State's position at the time of submission of this report is that he will consider the General Plan once the Mayor has made his decision.

Details of vehicle registrations

- 6.4.7 Details of vehicles registered in Great Britain are held by the Driver and Vehicle Licensing Agency. For vehicles registered in Northern Ireland there are separate arrangements operated by Driver and Vehicle Licensing Northern Ireland. TfL proposes that the Scheme Order is modified, subject to consultation, to take account of the separate database for Northern Ireland vehicles.
- 6.4.8 Because of vehicle registration arrangements, TfL further proposes, subject to consultation, that eligible military vehicles be registered for a 100% discount rather than having exempt status.

Europe

- 6.4.9 Following advice on the competition aspects of European law and the European Commission's attitude to the treatment of disabled people, TfL proposes modifications to the Scheme Order, subject to consultation, to extend many of the proposed exemptions and discounts and the fleet account facility to citizens or vehicles from European Union or European Economic Area Member States. These proposed modifications would cover discounts for certain vehicles exempt from vehicle excise duty: ambulances, invalid carriages and vehicles used for the carriage of disabled people by a recognised body; blue badge holders; buses; and recovery and accredited breakdown vehicles.

'Institutional' Blue Badge

- 6.4.10 TfL are proposing to treat institutions in receipt of a Blue Badge in a comparable manner to individual Blue Badge holders. A modification is proposed for consultation.

Other Proposed Modifications

- 6.4.11 TfL also proposes a number of minor modifications, subject to consultation, to improve the clarity and structure of the Scheme Order, and to correct minor typographical errors and omissions. These are included, together with all TfL's recommended modifications, in Annex I – the Draft Instrument of Confirmation. Schedules to the Instrument detail the changes as between the made Scheme Order and the final version of the Scheme Order as proposed to be modified and as now recommended by TfL to be confirmed by the Mayor.

Chapter 7: Developments since the July 2001 consultation – scheme proposals and mayoral strategies

7.1 Introduction

- 7.1.1 This chapter considers how the proposed scheme would complement the Mayor's Transport and other strategies for London. It provides an updated assessment of the various issues covered by Sections 8, 10 and 11 of the documents contained in the Information Pack issued with the Scheme Order for public consultation in July 2001. These covered traffic management issues, the contribution of the proposed scheme to the Mayor's transport and other strategies for London, and monitoring the scheme impacts of the proposed scheme.
- 7.1.2 This chapter looks particularly at the anticipated traffic and transport changes resulting from the proposed scheme and how TfL's understanding of these impacts has developed since July 2001. It updates the impact projections from those issued in the July 2001 consultation material and in the Background Technical Note made available on request in August 2001. It takes account, where necessary, of the modifications to the Scheme Order proposed by TfL. It also gives particular attention to the traffic management strategy associated with the proposed scheme, where there have been significant developments of which the Mayor should be aware.
- 7.1.3 Chapter 8 reviews separately the development of complementary transport measures since July 2001.

7.2 Traffic impacts

- 7.2.1 The proposed scheme would be the first of its type in Britain. It follows that most of the information on the traffic impacts must rely on purely predictive models, based on how people say they would respond to charges, albeit under specialised research conditions. TfL has established detailed estimates of the likely range of possible effects of the proposed scheme on London's traffic and transport patterns. These have been derived from research for the ROCOL study which reported in March 2000, the London Congestion Charging Research Programme which reported in 1995, and from computer models based on established techniques of traffic and transport analysis and which are in common use for testing transport proposals in London both by TfL and the London Boroughs.
- 7.2.2 The work involving computer models to project the traffic and transport impacts of the proposed scheme has continued since July 2001. The objectives are to:
- provide projections of the traffic and transport effects of the proposed scheme;
 - assist public consultation and allow alternative proposals to be assessed;
 - assist the integration of the proposed scheme into the wider Transport Strategy;
 - support the development of the traffic management strategy;

- inform the development of complementary public transport services; and
- support the assessment and monitoring of the proposed scheme.

7.2.3 Since public consultation began on the Scheme Order in July 2001 and the Background Technical Paper Modelling of traffic and transport effects was made available in August 2001, there has been a whole new cycle of projections from the LTS and SALT models, supported by localised TRANSYT models. This additional work has confirmed the broad conclusions reached in July, and provided TfL with a much clearer understanding of the scope of the complementary traffic management strategy required to support the operation of the proposed scheme.

7.2.4 There have also been numerous meetings with Boroughs, as the local highway authorities, both individually and collectively, to discuss the local application of the projections to the development of local traffic and parking management measures on the roads for which they are responsible.

7.2.5 Through all this work, a range of projections has been developed, based on 'lower' and 'higher' driver response assumptions or sensitivities to the proposed scheme as used in the projections for public consultation in July 2001. A lower sensitivity assumes fewer drivers change their existing driving patterns following introduction of the proposed scheme. A higher sensitivity assumes more drivers change their existing driving patterns. In this way, the proposed traffic management measures and complementary transport arrangements are designed so as to address both extremes of a range of driver responses to the proposed scheme.

7.2.6 This continuing work has reviewed the lower and higher sensitivity demand assumptions regarding the response of drivers to the proposed scheme. This has taken account of consultation responses and the expected scale of discounts and exemptions. No significant changes to the demand factors were considered necessary.

7.2.7 Put simply, the higher sensitivity assumptions approximate to the broad order of demand changes projected for a £5 charge in the ROCOL study; the lower sensitivity projections produce a net change in traffic levels broadly equivalent to two-thirds of those under the higher sensitivity assumptions. In considering the likely impacts of the scheme, both levels of response should be taken into account. However, TfL tend to regard the lower sensitivity projections as more demanding for assessing traffic management measures and the higher sensitivity projections as more demanding for assessing transfers to public transport. TfL's aim is to produce a robust scheme, which can accommodate a wide range of driver responses.

7.2.8 In summary, the results of this extensive research shows that:

- the proposed scheme will deliver the policy objective of reducing traffic congestion in central London and beyond, and as a result congestion in London should be reduced by 10 to 15 million person-hours per year;
- the proposed scheme should change some of the established traffic patterns within London, with less traffic coming into and out of the charging zone and an increase in traffic moving around the charging zone, but with net reductions both within and outside

the charging area;

- these traffic changes could be accommodated through straightforward though much improved local traffic management techniques introduced before the scheme is implemented and thereafter in the light of results from monitoring the operation of the scheme in practice; and
- the scale and plausible range of these traffic changes under a range of sensitivity assumptions can be capable of being accommodated through the proposed traffic management arrangements based on adjustments to traffic signal timings, with the critical junctions controlled and monitored by a new computer system that can reset the signals in response to different traffic conditions.

7.2.9 The work on modelling results since July 2001 has continued to involve the full set of models, albeit with the emphasis changing as the investigations have become more localised and specific. Although some results have been refined or revised, the results from this further work both support and reinforce the conclusion reached in July 2001. Annex E3 updates the August 2001 Background Technical Paper to reflect the overall analysis as at January 2002.

7.2.10 The following paragraphs highlight the insights provided by the two main models – the London Transportation Studies model (LTS) and the SATURN Assessment of London's Traffic (SALT) model.

7.3 The LTS model

7.3.1 The latest results from the more strategic LTS model provide the following insights into the traffic flow impacts of the proposed scheme:

- inbound radial traffic in Inner London in the 7.00am to 10.00am morning peak should reduce by 5% to 9% overall, depending on the approach direction, for the lower sensitivity projection and 8% to 14% for the higher sensitivity projection;
- morning peak orbital traffic on roads in inner London, including the Inner Ring Road, should increase by a total of 1% to 5% depending on locality, for both the lower and higher sensitivity projections;
- traffic using the Inner Ring Road would increase by about 10%, taking up the effective capacity provided by adjustments to traffic signals to favour orbital movements;
- excluding the Inner Ring Road, morning peak traffic on orbital roads near to the charging zone would increase by a total of 1% to 3%;
- in the 4.00pm to 7.00pm evening peak, the traffic changes are similar to those during the morning peak, but with marginally larger reductions on outbound traffic compared with the corresponding morning peak inbound traffic and marginally smaller impacts on orbital traffic – this is a less challenging set of changes for the traffic management strategy to deal with; and

- the transfer to rail, underground and bus services, approaching the charging zone in the critical morning peak period represents a 1% to 2% increase in overall public transport patronage

7.3.2 The aggregate traffic impacts projected by the LTS model for the morning peak period, 7.00am – 10.00am, can be summarised as follows, with the range expressed in terms of lower and higher sensitivity projections:

- traffic activity should reduce by 12% to 17% within the charging zone, and by 1% to 2% within the annulus between the Inner Ring Road and the North and South Circular Roads;
- traffic activity in the inner London boroughs outside and excluding the Inner Ring Road itself should experience an overall reduction of 2% to 3%;
- average traffic speeds should increase by 8% to 12% within the charging zone and by 2% to 3% within the annulus of the North and South Circular Roads including the Inner Ring Road;
- congestion,(expressed as time spent delayed in traffic)should reduce by 18% to 26% within the charging zone, and overall by 4% to 7% in the annulus, with some areas closer to the charging zone experiencing reductions of as much as 6% to 9%;
- on the Inner Ring Road itself overall traffic should increase by 8% to 9% facilitated by the additional effective capacity provided by adjustments to traffic signals; average speeds are projected to fall by about 7% to 10%, though more detailed traffic signal coordination than can be represented in the model, is likely to mean that the overall journey speeds experienced by drivers would be comparable to those prior to congestion charging; and
- about 60% of the net traffic reduction inside the charging zone should result from fewer vehicles being brought into the zone; and about 40% would result from previous through traffic being displaced to routes outside the charging zone.

7.3.3 For the period between 10.00am and 4.00pm, no LTS modelling was carried out. The earlier work with the AREAL/APRIL model had shown that relative traffic reductions and hence improvements in congestion would be greater than either the morning or evening peak periods as there is a somewhat larger proportion of drivers making journeys of the types likely to be more influenced by congestion charging during this period. In subsequent calculations of overall benefits, the average of morning and evening changes was applied to this 'inter-peak' period.

7.3.4 The LTS model projections also took account of the scale of additional car traffic that following analysis might arise because certain journeys become quicker and easier as a result of reduced congestion. This effect is considered to be relatively modest in its impact and a small net positive increase in car travel on parts of the road network was confined to elements of the higher sensitivity projections.

7.4 SALT model

- 7.4.1 The SALT model has been and will continue to be used to provide a second, more detailed, picture for the area in and around the charging zone. The latest cycle of SALT model results have incorporated three main improvements. Firstly, a better representation of taxi movements has improved the characterisation of charging within the model; the result is a slight anticipated reduction in the extent of decongestion as taxis are now properly modelled as being exempt from charging, rather than being treated as cars.
- 7.4.2 Secondly, a slight increase in the capacity of the approaches to Tower Bridge and the relaxation of an unrealistic constraint on the capacity of the Bridge itself has removed some anomalous routeings in Southwark where traffic was detouring to use Blackfriars Bridge. And thirdly, detailed representations of the Inner Ring Road signal settings have been introduced.
- 7.4.3 The revised SALT model has been used to examine, within its recognised limitations, the impact of a series of sensitivities and traffic proposals. It should be borne in mind that the SALT model deals with the busiest peak hour and utilises more detailed modelling of individual junctions.
- 7.4.4 In summary, taking account of the refinements which have been introduced to the model, the insights it provides are as follows:
- traffic reductions of between 9% to 13% inside the charging zone with the introduction of charging, (these are, as expected, slightly smaller reductions than predicted by the LTS model for the whole morning peak period figures used which are more demanding and represent a greater challenge for traffic management design);
 - junction by junction round the Inner Ring Road, the SALT model confirms that the pattern of anticipated flow changes from radial routes to orbital routes can realistically be accommodated within the flexibility offered by signal re-timing;
 - the impacts of displaced traffic, even for the peak hour modelling, would be restricted to routes within a few kilometres of the Inner Ring Road;
 - while the results need to be interpreted in the context of local traffic patterns and developing traffic management designs, the orbital traffic flow changes can be characterised as increases of up to 600 pcus per peak hour (average 300) on the Inner Ring Road itself, both directions combined, with a further increase of up to 500 pcus (average 200) on the next three or four orbital routes, with a high value on the Inner Ring Road associated with a low value on the other orbital routes. These results vary only slightly between lower and higher sensitivity projections; and
 - increases round the north and south sides of the charging zone would be lower than those projected round the eastern and western sides principally because Marylebone Road and New Kent Road carry both reduced radial as well as increased orbital traffic.
- 7.4.5 These projections present a somewhat more benign impact than those suggested in the July 2001 projections. This is because the detailed traffic signal re-timings and other traffic management measures, now reflected in the SALT model, should deal more

effectively with local changes in traffic patterns.

7.4.6 The sensitivity tests undertaken with the improved version of the SALT model and the localised TRANSYT models included examinations of:

- an extreme worst case for orbital traffic, combining the lower sensitivity reduction in radial traffic with the higher sensitivity level of diverted traffic. This produced increases in orbital traffic up to 50-100 pcus per hour (both directions combined) higher than those suggested by the lower sensitivity case. Even without detailed re-adjustment of traffic signals, the results are only slightly more challenging than those produced by the lower sensitivity projection and well within the capacity of signal timing flexibility. This provided useful assurance to TfL that straightforward traffic management measures will be able to handle the new patterns of traffic around the proposed charging zone;
- an adjustment to the charging zone boundary route to examine the suggestion by some consultees (others opposed the idea), that Kennington Lane be replaced by Kennington Park Road and Harleyford Road between the Elephant and Castle and Vauxhall Cross junctions. This showed that moving the charging zone boundary outwards was not beneficial in traffic management terms. Kennington Lane itself carries a mix of local, radial, and orbital traffic. Consequently the impact of the proposed scheme should be relatively slight, and moving the boundary causes little change in anticipated traffic levels on Kennington Lane. If the boundary were moved out to the Oval junction, however, even the slight increases in traffic flows anticipated there would have a markedly adverse affect on this critical junction, and reduce the opportunity to provide safe and convenient access and egress for the substantial pedestrian movements to and from the Oval Underground station; and
- the Paddington area with the Bishop's Bridge Road closed as currently planned to happen for 22 months from Easter 2002. This showed that the closure could be catered for through local traffic signal re-timings, though it does cause a diffuse westwards diversion of traffic. The impact of the proposed scheme with the closure would be very similar to the impact anticipated in the original 2002 Reference Case.

7.4.7 TfL is well aware that the SALT model projections need to be treated with care; the model is being further refined and its representation of the local road network will continue to be improved and refined if the Scheme Order is confirmed to ensure its projections are as consistent as possible with the latest information provided by Boroughs as traffic works are progressed and completed to take account of their impact on traffic flows.

7.5 Conclusions on traffic impacts

7.5.1 TfL's conclusions based on all of this further work with the traffic models are that:

- the proposed scheme should result in traffic impacts much as indicated in the public consultation material produced in July 2001;
- there should be substantial reductions in traffic congestion and, with more resilience in the performance of the road network, the reliability of journeys into or around the charging zone should be much improved once the scheme goes live;

- the new traffic patterns should be accommodated by adjustments to traffic signals;
- the management of the Inner Ring Road is critical to accommodating the displaced through traffic; it should be arranged to deliver as much effective traffic capacity as possible at its key junctions; and
- displaced traffic should only be noticeable on routes within a few kilometres of the Inner Ring Road.

7.6 The associated traffic management strategy

- 7.6.1 The traffic management strategy outlined in the documents accompanying the made Scheme Order in July 2001 is on course to be implemented in advance of the proposed introduction of the scheme. The strategy reflects the wider initiatives in the Mayor's Transport Strategy such as more effective enforcement of parking and loading restrictions on the Transport for London Road Network (TLRN), which includes the Inner Ring Road, better enforcement of all bus lanes within Greater London and more effective co-ordination of streetworks and road maintenance.
- 7.6.2 The Traffic Management Statement published as Section 8 of the Information Pack supporting the Scheme Order in July 2001 remains valid. Since then, a comprehensive analysis has been undertaken of the potential impacts of the proposed scheme around the Inner Ring Road and the immediate radial road approaches, making use of the latest projections from the LTS and SALT models and the localised TRANSYT models.
- 7.6.3 This work has been undertaken against the general background of the policies contained within the Mayor's Transport Strategy, particularly in relation to the road hierarchy, buses, pedestrians and cyclists. A number of traffic management consultants have been working with TfL to review impacts all around the Inner Ring Road and to propose traffic management measures to cater for them.
- 7.6.4 The key schemes, which TfL considers should be introduced by January 2003, are listed in Table 1 at Annex E2 of this report. If the Mayor confirms the Scheme Order during February 2002, TfL considers that all these schemes should be introduced before January 2003.
- 7.6.5 In addition to the key traffic management measures that are primarily related to the implementation of the charging scheme itself, a number of complementary traffic management measures are proposed. Examples of complementary measures include traffic reduction schemes, controlled parking zones, pedestrian schemes, cycle schemes and interchange schemes. Many of the schemes have been put forward by Boroughs and will be subject to local consultations. At present, most of the schemes involve initial design and assessment work. Any final decision to proceed with schemes needed solely for congestion charging will only be made when the congestion charging Scheme Order has been confirmed. Schemes involving repair and maintenance works to road surfaces and footways have been approved to ensure completion in advance of the charging scheme and to avoid disrupting the scheme operation. The schemes to complement the

charging scheme that have been approved to date are listed in Table 2 at Annex E2 of this report.

Managing the Inner Ring Road

- 7.6.6 Because of the importance of the performance of the Inner Ring Road, TfL is developing a responsive approach to managing the traffic on this route, known as 'dynamic boundary management'. This involves responsive traffic control arrangements that automatically adjust traffic signal settings in response to traffic levels and queues.
- 7.6.7 Such computer-controlled traffic signal co-ordination techniques are already used to good effect in various locations within London including junctions on the Inner Ring Road. These boundary management arrangements would make use of the latest technology with the aim of:
- monitoring traffic conditions on the Inner Ring Road, the proposed charging zone boundary;
 - monitoring traffic conditions on the radial approach roads; and
 - adjusting traffic signals to ensure an appropriate balance of traffic conditions on the relevant road system.
- 7.6.8 These arrangements have the merit of being able to get the best out of the Inner Ring Road at all times in terms of facilitating the movement of vehicles, and to adjust across the early weeks of the proposed scheme as drivers adapt to the new arrangements and traffic patterns settle down. It will also contribute to the impacts monitoring arrangements. The system will be aware of congestion through detectors in the road surface that measure when traffic is stationary or moving very slowly.
- 7.6.9 Early traffic management preliminary design reports, commissioned by TfL, have been updated and the anticipated impacts of the charging scheme on the Inner Ring Road re-examined. A number of areas where network management may need particular attention have been identified.
- 7.6.10 The potential extent of the impact of the proposed scheme has also been reviewed and a zone of influence identified, within which the impact should be noticeable. Network changes as a result of congestion charging are concentrated within an area 1.5 - 2 km from the Inner Ring Road.
- 7.6.11 It will be expected that the dynamic boundary management system will be concentrated within this zone of influence. It will enable each junction to be monitored and traffic to be managed using the computer controlled traffic signals to maintain appropriate traffic conditions on the Inner Ring Road.

Achieving the Boundary Management Strategy

- 7.6.12 The main traffic management and system design work is being undertaken in close liaison with the relevant Divisions within TfL, particularly Street Management Services, Traffic

Technology Services, the London Bus Initiative and Surface Transport. Meetings have also been held with relevant London Boroughs, who have in general indicated support for TfL's traffic management proposals. Further meetings have been and will continue to be held to discuss specific schemes and impacts within individual London Boroughs.

- 7.6.13 The development of the real time monitoring arrangements is being undertaken closely with the Traffic Technology Services Division of TfL Street Management Directorate and it is intended that this will be incorporated within the new London Traffic Control Centre within TfL Street Management. This real time database will enable traffic and bus movements to be monitored and compared with historical patterns so that problems can be quickly identified. It is planned to have the arrangements in place by Autumn 2002 so that they can be fully tested before the scheme goes live.
- 7.6.14 A number of contingency plans will be developed which can be relied on as required to cope with particular traffic situations. These may range from modification of signal timings at a particular set of signals to changing timings in one or more computer controlled regions to achieve the desired objectives. The key will be to maintain flexibility, at least initially until traffic patterns have adjusted after the introduction of the proposed scheme and more reliable data has been obtained and fully analysed as part of the monitoring programme.
- 7.6.15 The conclusion of the traffic management and traffic modelling work is that the possible range of traffic impacts from the introduction of the proposed scheme can be catered for by making use of these flexible and adaptive signal control arrangements.

7.7 Road safety impacts

- 7.7.1 The model projections have also been used to inform a fresh assessment of the potential impact of the proposed scheme on traffic accidents involving personal injury. This assessment has considered in more depth the changes in traffic levels and the possibility of increased use of pedal cycles and motorcycles than was done for the public consultation in July 2001.
- 7.7.2 At that time TfL considered that there could be accident reductions of 250 to 300 per year across Greater London.
- 7.7.3 The more detailed analysis produces somewhat lower, but more reliable, numbers of reduced accidents – with projections of 150 (lower sensitivity) to 250 (higher sensitivity) fewer accidents per year across Greater London. To place this in context currently there are 38,000 reported road accidents each year in Greater London. Fewer than 2,500 of these, or about 7% of the total, would occur within the proposed charging zone or on the Inner Ring Road during charging hours.
- 7.7.4 The new assessment also indicates the sorts of issues that should be considered as part of TfL's wider responsibilities towards the management of London's road system and to the road safety targets set out in the Mayor's Transport Strategy, in particular, the management of the Inner Ring Road and the accident rates associated with motorcyclists. The projections suggest that the diversion of traffic to the Inner Ring Road would be accompanied by a diversion of accidents. They also suggest that there could be a very small net increase in motorcycle and pedal cycle accidents following the introduction of

the proposed scheme, if these modes of transport were to be used instead of public transport by significant numbers of ex-car users.

- 7.7.5 These projections of potential changes in accidents assume that no specific traffic measures are introduced to deal with the potential new pattern of accidents. However, the introduction of the proposed new traffic management and traffic control measures would likely improve the operation of the Inner Ring Road and hence reduce the overall accident rates. Wider transport and road safety policies as set out in the Mayor's Road Safety Plan for London, such as the introduction of more pedal cycle facilities or allowing motorcyclists to use bus lanes, would likely have a larger positive impact in terms of reducing the overall levels of pedal and motorcycle accidents than introduction of the proposed scheme.

7.8 Public transport impacts

- 7.8.1 The LTS model was also used to re-examine the public transport effects of introducing the proposed scheme. Once again there was little difference from the conclusions produced for public consultation on the Scheme Order in July 2001. The car trips that would transfer to public transport, if congestion charging were introduced, represent a very small proportion of current public transport patronage – some 1% to 2%. This change is relatively modest compared to background changes that are already and will continue to be caused by service improvements, fare changes and employment trends. For example, preliminary survey results indicate that the overall number of bus passengers entering central London during the three hour morning peak period increased by at least 10% between 2000 and 2001.
- 7.8.2 Of the projected transfers to public transport inbound to the proposed charging zone in the critical morning peak period (7.00am – 10.00am), about 60% are expected to be from Inner London, 30% from Outer London and the area inside the M25, and the remaining 10% from locations beyond the M25.
- 7.8.3 The likely impacts on individual public transport corridors have been examined. A consistent pattern of 1% (lower sensitivity) or 2% (higher sensitivity) overall increase is projected, with only the west London sector producing a 2% or 3% overall increase. In all cases TfL expects the bulk of the net increase in passengers to be taken by bus.
- 7.8.4 Within these model projections, the proposed scheme would result in a 'cascade' of mode switching, with around half of transferred car users moving to the underground and rail services system and half moving directly to bus. As a consequence, some of the transfers to rail and underground will replace underground or rail passengers who have transferred to bus as a result of the reduced congestion and enhanced service levels improving the reliability and attractiveness of bus services to such passengers.
- 7.8.5 The outcome is that the net combined change in underground and rail inbound passengers in the critical 7.00am - 10.00am morning peak period is an increase of up to 5,000 additional inbound passengers, equivalent to one quarter of the total transfers from car. On bus services the net increase is up to 15,000 additional inbound passengers representing three quarters of the net transfers from car.

7.8.6 Three further points need to be borne in mind when assessing the overall public transport capability to deal with the consequences of the proposed scheme:

- public transport dominates travel into central London and changes in the relative levels of service and fares could cause marked changes in the balance of passengers as between bus, underground, and rail patronage, separately from any passenger impact arising from these modes of transport accommodating transfers from car journeys.;
- within the overall 'cascade' between public transport sub-modes, there will be a small increase in the demand for park and ride access to rail and underground stations, principally in outer London; and
- capacity limits on the underground and rail services can be a binding constraint so parallel attractive bus services represent an important opportunity for increasing overall public transport capacity into central London, particularly in the short term.

7.8.7 These issues are being addressed by the work to implement the Transport Strategy. They are taken up again in chapter 8, which reviews the provision of public transport improvements that would complement the proposed scheme. The proposed scheme will only have a significant effect in inner and central London: this applies to public transport as well as to traffic. Since the impacts on congestion are focused on central and inner London, the bus services will experience the greatest impact.

7.9 Environmental Impacts

7.9.1 There is not a requirement under national law for an environmental impact assessment to be undertaken for the proposed scheme. Nevertheless TfL consider that the scheme should be implemented in accordance with good environmental practice and that sufficient understanding of the environmental consequences of the scheme should be gained before recommendations on the Scheme Order are made to the Mayor.

7.9.2 Therefore the effects of the scheme have been assessed in accordance with the criteria laid down in Annex III of Council Directive 85/337/EC (as amended) on the assessment of the effects of certain public and private projects on the environment in order to determine whether the scheme is likely to have significant environmental effects or not. The criteria are set out in Annex E5.

7.9.3 The key potential impacts that could arise from the scheme are: the effect of the scheme on traffic movements; the effects of street furniture; the effects of road works and other operations. It is not considered that any other features of the scheme have the potential to give rise to impacts of any significance in the present context.

Traffic effects

7.9.4 The traffic modelling work has demonstrated that there would be an overall reduction in traffic both inside and outside the congestion charging zone, with a decrease in radial traffic in inner London and an increase in orbital traffic on the Inner Ring Road and on

other orbital routes.

- 7.9.5 The main environmental impacts from traffic are noise, vibration and air emissions. Insofar as there is likely to be a decrease in traffic, the environmental consequences, having regard to the criteria in annex III, are likely to be beneficial.
- 7.9.6 Insofar as local increases in traffic have been predicted, the modelling has demonstrated that this can be adequately accommodated on the existing road network. There will be complementary measures - such as traffic management measures and improved public transport – which are integral parts of the scheme. The Inner Ring Road is already heavily used by traffic - the noise, vibrations and air emissions that it causes are part of the existing environment. The levels of increases predicted on this road are not considered likely to give rise to worsening environmental effects over and above existing conditions, and are hence not significant. Over London as a whole the impact on the environmental quality for people and wildlife is likely to be beneficial.

Street furniture

- 7.9.7 It is recognised that the impact of street furniture – primarily signs and cameras – will vary depending upon the detailed design and location of the proposals and the existing street environment in question. The potential impacts associated with street furniture relate to visual impact and the impact on heritage, though there may be potential temporary impacts during the installation phase – see below.
- 7.9.8 In many locations there is already a considerable amount of street furniture and traffic signs. TfL will seek to remove redundant signs or other street furniture and wherever possible combine existing and new sign faces onto single support assemblies to reduce clutter. TfL have considered the potentially more sensitive locations, where sites are in areas of high historic, architectural and conservation importance. TfL have sought advice from English Heritage and a detailed inventory of the built heritage at each of the boundary points has been assembled.
- 7.9.9 TfL consider that the proposals for the signing and camera strategy, shown in Annex E5, are not likely to give rise to significant adverse visual and heritage effects.

Road works and installation activities

- 7.9.10 Road works and installation activities associated with congestion charging will be relatively small scale at various locations in central London. It is recognised that they will have the potential to disrupt the road network, cause noise, vibrations and air emissions, and conceivably depending on their location, impacts on ecological resources – but that these effects will be minor.
- 7.9.11 TfL have considered the nature, type and location of works necessary to implement the traffic management proposals and to put in place the necessary street furniture. Many traffic management schemes are proposed though they are all relatively minor in extent and generally dispersed in terms of their location. They are not, individually or cumulatively, considered likely to give rise to significant environmental effects.

- 7.9.12 The installation of signs and cameras will involve minor works. Attachment to buildings of historic or architectural importance will not be necessary. The works are likely to be short in duration. Again, it is not considered that these works will have significant environmental effects. Where works are proposed near to areas of potential ecological importance, such as the fringes of a park or metropolitan open space, there is potential for some adverse effects during the course of the work. However, significant effects are not considered likely.
- 7.9.13 TfL examined these effects prior to July 2001 to provide information for the consultation on the Scheme Order in July 2001. TfL considered the likely environmental effects and assessed the physical effects of the scheme, environmental effects including noise and vibration, visual impacts, ecology, water, heritage and construction effects, and the relationship with the Mayor's emerging biodiversity, waste, air quality, noise and energy strategies.
- 7.9.14 The results were presented in item 10 of the July 2001 Stakeholder Pack, How the congestion charging scheme supports the Mayor's strategies for London, specifically in paragraphs 60 - 63 (physical effects), 64 - 66 (environmental effects), 138 -140 (biodiversity), 141-142 (waste), 143 - 148 (air quality), 149 -150 (noise) and 156 - 157 (energy).
- 7.9.15 This work concluded that there were no likely significant adverse environmental effects. Nevertheless care would need to be taken in siting traffic signs and enforcement cameras to minimise the visual impact in conservation areas and in the vicinity of heritage sites.
- 7.9.16 Since July 2001, the understanding of the traffic impacts of the scheme has improved, there have been significant developments in the traffic management strategy and the strategy and designs for the scheme signs, cameras and other associated infrastructure has developed. The elements of the scheme are sufficiently clear to enable TfL to assess the likely significant environmental effects of the scheme.
- 7.9.17 Taking the above matters individually or cumulatively, and having regard to the overall area covered by the scheme, the criteria contained in Annex III of the Directive and the predicted effects both inside, on and outside the scheme boundary, TfL are of the view that significant environmental effects are unlikely. There is of course expected to be an overall reduction in traffic, but this will have beneficial effects on the physical and living environment.
- 7.9.18 TfL have produced an Environmental Statement of Intent which covers design and construction procedures in respect of the environmental impacts of the works required to implement the congestion charging scheme. This aims to ensure that environmental considerations will be fully taken into account during the design and construction of the infrastructure works necessary to implement the congestion charging scheme.

7.10 Impacts on the ten priorities of the Transport Strategy

- 7.10.1 The Information Pack for the July 2001 consultation exercise assessed the effect of the proposed scheme on the ten priorities of the Mayor's Transport Strategy and, in broader terms, on each of the Mayor's other strategies for London.

- 7.10.2 There has been no substantive change to the assessment of how the proposed scheme would, or would not affect each of the Mayor's other strategies. Overall, the proposed scheme should improve transport conditions in central London leading to enhanced business efficiency and improvements to the general amenity and attractiveness of central London. However, it may also have an adverse effect on certain businesses, individuals or locations.
- 7.10.3 With better estimates of the costs and revenues of the proposed scheme, and after taking account of discounts and exemptions as a result of the proposed modifications to the Scheme Order, the net proceeds would be in the range of £130-£150 million. Such net proceeds are to be invested in transport within Greater London for at least the first ten years following the introduction of the scheme. For business planning purposes, £130million is considered a prudent estimate.
- 7.10.4 The most direct impact of the proposed scheme is on the Transport Strategy. It would impact operationally on four of the Mayor's ten priorities for transport in London:
- reducing traffic congestion;
 - making radical improvements to bus services across London;
 - improving journey time reliability for car users; and
 - making the distribution of goods and services more reliable, sustainable and efficient.

Reducing traffic congestion

- 7.10.5 Current traffic levels in central London make the road system very difficult to manage. The proposed scheme would reduce traffic levels inside and beyond the proposed charging zone, making conditions more predictable and reliable and providing scope for the network to cope more effectively with incidents or other capacity reducing events, such as road works or building works.
- 7.10.6 The proposed scheme is not the only policy or programme that will affect congestion levels in central London. Stationary vehicles in the wrong place can generate substantial levels of localised congestion. Better enforcement of parking and loading restrictions, especially on main roads has a very important role to play in delivering the objective of reducing congestion. TfL will be pursuing a more stringent enforcement policy in relation to such matters before the scheme is introduced. Better co-ordination and management of street works is another policy area which can contribute to this objective.
- 7.10.7 Traffic management more generally can have a major influence on congestion levels; especially through the management of important junctions on the main road system. Measures such as bus lanes, need to be carefully designed if they are not to increase overall traffic congestion levels, which can in turn affect bus operations. The actual change experienced by road users will therefore depend not only on the response to the proposed scheme but also the cumulative influence of other policies.
- 7.10.8 Congestion, as currently experienced in terms of average time spent delayed in traffic queues in the proposed charging zone is now around 2 minutes per kilometre. If other policies have a neutral effect on congestion, the proposed scheme would be to reduce this

to, or near to, a more reasonable average of 1.5 minutes per kilometre. The result would be much more reliable and predictable journey times and far fewer journeys encountering congestion levels of 3 to 5 minutes per kilometre when the network temporarily 'locks'.

- 7.10.9 Outside the proposed charging zone, particularly on roads not directly serving the charging zone, the traffic and congestion reductions would be more modest, but they will apply over a wide area and make an appreciable difference to the operation of the road system in those areas.
- 7.10.10 As the real value of a £5 charge diminishes through time, as a result of inflation and increased disposable income, its 'decongestion' impact will also diminish. The issue inevitably arises as to how fast the impact of the proposed scheme, at that level of charge, will decline.
- 7.10.11 Theoretical considerations suggest that over ten years, at current rates of inflation and increased affluence, it might lose up to half its real value. With car journey cross-elasticities against public transport of around -0.20, the level of charge might lose 10% of its traffic reducing impact over ten years. On the other hand the value placed on reduced congestion should increase in line with increased affluence over the same period. The actual impact and any changes over time will be gauged through the monitoring programme.
- 7.10.12 Statutory procedures exist to allow the Mayor to revise the charge. He could use these to maintain the original impact of the proposed scheme.

Making radical improvements to bus services across London

- 7.10.13 Congestion has a debilitating impact on bus operations. The reduced levels of congestion would make bus operations considerably easier and more reliable.
- 7.10.14 Around 40 % of London's bus passengers are carried on routes that cross central London. The proposed scheme would make a major difference to both the operation of such bus services. The better services would offer a more attractive alternative to certain underground and rail passengers so freeing up overcrowded services which in turn would offer car users a wider choice of public transport.
- 7.10.15 The next chapter discusses further the improvements in bus services that are being introduced as part of the Mayor's Transport Strategy.

Improving journey time reliability for car users

- 7.10.16 Car users driving into the proposed charging zone should experience a substantial improvement in the reliability of their journeys, in addition to their journeys being quicker. Roughly a third of car journeys in the proposed charging zone during charging hours are business journeys and these gains would be highly valued.
- 7.10.17 Taxi occupants would be another group who would experience reliability improvements. Taxis would be exempt from charges. Under the proposed modifications to the Scheme

Order, minicab drivers and occupants would also experience these benefits and will be exempt from charges once they become fully licensed.

- 7.10.18 Many car journeys within Inner London would also benefit, without paying the charge. There should also be benefits to journeys in Outer London, though the reliability gains would probably be difficult to detect.

Making the distribution of goods and services more reliable, sustainable and efficient

- 7.10.19 Commercial vehicle operations will benefit from reduced congestion. The proposed scheme would make individual journeys quicker and more reliable, and the easier predictions of journey times would assist the management of vehicle fleets and improve logistics.

- 7.10.20 The introduction of the proposed scheme is expected to result in few direct operational and / or journey changes from commercial vehicle operators, at least in the short term. A £5 charge would make only a very small addition to such operators' costs and under the proposed modifications to the Scheme Order there would be special provisions for the operators of fleets of more than 25 vehicles, making the payment process easier. Drivers of most alternative fuel vehicles would not have to pay the £5 charge.

- 7.10.21 In addition to improving the reliability of commercial vehicle operations, the improved conditions on the road system could allow some intensive users to reduce the effective size of their vehicle fleets, thus improving sustainability and efficiency.

- 7.10.22 It can be concluded from this further review, as was concluded in July 2001, that the proposed scheme should contribute directly to several of the priorities of implementation of the Transport Strategy, that it should assist the funding of the Transport Strategy, and that it should not conflict with any of the other priorities of the Transport Strategy.

7.11 Contribution to other strategies

- 7.11.1 The contribution of the proposed scheme to the established and emerging Mayoral strategies for London was discussed in Section 10 of the Information Pack issued with the Scheme Order in July 2001. There have been relatively few developments since then. An analysis of the interactions between other Mayoral strategies and the proposed scheme has been prepared by TfL. This section concentrates on the Spatial Development Strategy which will eventually provide an overall context for all mayoral strategies, the Economic Development Strategy, published in July 2001, and the emerging Air Quality Strategy.

Spatial Development Strategy

- 7.11.2 The Spatial Development Strategy, to be called The London Plan, will set out the spatial elements of an integrated social, economic and environmental framework for the future development of Greater London in the context of the wider South East Region and Europe. It will integrate the physical and geographic dimensions of the Mayor's other strategies, including broad locations for change and provide a framework for land use management and development.

7.11.3 The Mayor consulted on a document called Towards the London Plan in May 2001. This set out a vision for London and the broad policy directions, which will guide the preparation of the draft London Plan. It also set out six main challenges to be met:

- economic and demographic growth;
- creating a prosperous city;
- increasing the supply of housing;
- ensuring an accessible city;
- promoting a green city; and
- creating a city for people.

7.11.4 Each of them relates closely to the Mayor's vision for London as:

- a prosperous city;
- a city for people;
- an accessible city;
- a fair city; and
- a green city.

7.11.5 The six challenges are briefly discussed in turn.

Economic and demographic growth

7.11.6 London's population and economy are growing. Economic growth is essential to London's future success and fundamental to improving quality of life. The economic growth forecasts assumed by the Transport Strategy present a number of challenges to London, including an increase in the number of journeys, which if not met by an adequate response will lead to even more congested roads and crowded public transport. The proposed scheme has an important role in reducing traffic congestion in central London and beyond both now and in the future. It would help to meet the challenge of coping with the damaging constraints that congestion will inevitably impose on London's economic and demographic growth if left unchecked.

7.11.7 Further analysis of future growth is being undertaken to support the development of the draft London Plan. This is not yet finalised, but current estimates indicate that the central view on employment forecasts, particularly in the key finance and business services sector, are likely to be higher than those assumed in the Transport Strategy. This further supports the case for the introduction of the proposed scheme to reduce traffic congestion in the proposed charging zone, where employment growth is expected to be particularly strong. Growth also creates further need for additional public transport capacity, which would be funded in part by revenue from the proposed scheme.

7.11.8 Towards the London Plan recognises that it is vital to support and strengthen central London / the proposed charging zone. It is expected that the proposed charging scheme will contribute to the spatial development policies of the London Plan by reducing traffic in central London and improving its attractiveness and business efficiency. It should also

allow road space in central London to be released for buses, walking and cycling and other environmental improvements.

Creating a prosperous city

- 7.11.9 The proposed scheme will help maintain London's global status by increasing the attractiveness and quality of life in central London for companies and their employees. Revenues raised from the proposed scheme could help to improve transport accessibility to central London and other development centres such as Canary Wharf, Thames Gateway and local town centres.

Increasing the supply of housing

- 7.11.10 The London Plan will develop the concept of 'sustainable residential quality', which takes account of location, public transport accessibility, density and car parking. The proposed scheme is likely to have little influence on this aspect of the London Plan.

Ensuring an accessible city

- 7.11.11 The London Plan will include an examination of the development opportunities that may arise from the introduction of the proposed scheme. It would seek to take advantage of the benefits of the proposed scheme for central London and would look at its impact on the character of streets both within the proposed charging zone and on its fringe. The monitoring of congestion charging would assist this examination.

Promoting a green city

- 7.11.12 London has great potential to be a much more people-friendly or 'liveable' city. One particular initiative is the 'World Squares for All' project. This aims to revitalise Trafalgar Square, Parliament Square and Whitehall by increasing access for pedestrians. The proposed scheme would help to meet this objective within central London by reducing traffic, assisting bus operations and so facilitating the implementation of the initiatives, such as the World Squares project.

Creating a city for people

- 7.11.13 The overall goal of all the Mayor's strategies is to improve the quality of life for Londoners. The Mayor recognises that individual Londoners have individual needs. The design of the proposed scheme seeks to assist the many who live, work and visit central London. The monitoring strategy would look carefully at how individuals are affected by the proposed scheme and whether adjustments to the scheme should be considered.
- 7.11.14 The proposed scheme would complement the developing approach to parking policy outlined in the Transport Strategy and which will be developed in The London Plan.

7.11.15 The draft of The London Plan is expected to be subject to formal consultation in summer 2002, with an anticipated examination in public at the end of 2002. Formal adoption is anticipated in mid 2003.

Economic Development Strategy

7.11.16 The Economic Development Strategy sets out to promote and develop London's strengths whilst also addressing the challenges it faces. It is based on four guiding principles:

- supporting London's economic growth, both as a world business centre and as a balanced regional economy
- developing London as a city of knowledge and learning in order to fulfil the potential of its people and its business
- working to support London's continuing renewal as a vibrant and inclusive city, acknowledging the ethnic cultural and linguistic diversity of its people as an asset;
- ensuring that London's growth respects the need for solid progress, environmental protection and conservation of scarce resources.

7.11.17 Developing London's role as a world business centre and European business capital is one of its strategic objectives. The quality and efficiency of Central London as a place to do business enhances its competitive advantage and its ability to attract world class organisations, high calibre staff, overseas visitors and international events.

7.11.18 The proposed scheme is forecast to generate a net economic benefit for London. It should make central London a more attractive place in which to work and do business.

7.11.19 The proposed scheme would assist the London Development Agency's strategic objective to develop London's role as a place to do business. It would provide additional funds for transport investment that can contribute to London's development and regeneration.

7.11.20 Alongside these overall benefits, it is recognised that there may be particular businesses, households or locations, which experience a net disbenefit. TfL's proposed monitoring programme will provide an assessment of the impact of the proposed scheme – and identify where any such disbenefits may be occurring and how they might be alleviated. The London Development Agency would assist TfL in the monitoring of economic impacts.

Draft Air Quality Strategy

7.11.21 The Air Quality Strategy was published in draft in September 2001. It aims to reduce the damaging effects of air pollution on London's health and to create a city with air that is pleasant to breathe.

- 7.11.22 Improving London's air quality would make London a more sustainable city and a more attractive place in which to live, work, visit and invest. The Mayor's objective is to minimise the adverse effects of air pollution on human health. The Mayor's Air Quality Strategy proposes to work towards this objective through the health-based National Air Quality Objectives set by the Government. In setting policies in pursuit of these objectives, the Strategy takes account of the wider economic, social and environmental issues.
- 7.11.23 Air quality in central London is improving significantly, but concentrations of certain pollutants are still predicted to exceed the objectives set in the Government's National Air Quality Strategy. By reducing traffic volumes within central and Inner London, the proposed scheme should reduce the scale of vehicle emissions.
- 7.11.24 However, the relationship between changes in traffic conditions and concentrations of air pollutants is complex and the expected impact of the proposed scheme on air quality would be barely discernible. Reductions of the order of 1% in the concentrations of two key pollutants, oxides of nitrogen (NO_x) and fine particles (PM₁₀), are projected within the proposed charging zone and there may also be a net reduction in the size of the area where air quality standards are exceeded.
- 7.11.25 There are several reasons for the limited impact of the scheme on air quality. The proposed scheme will primarily affect only a proportion of car activity during the working day. It will have little effect on vans or lorries but may result in increased bus and taxi activity, two categories of vehicle with higher levels of emissions. Moreover, at the current levels of pollution in central London any changes to primary emissions of NO_x and PM₁₀ do not inevitably translate into the equivalent improvements in air quality. This is due to the chemistry involved in NO₂ production and significant concentrations of airborne particles arriving in London from outside London as a whole.
- 7.11.26 It is possible that the proposed discounts for alternative-fuel vehicles may encourage more of these vehicles to be used for journeys into the charging zone and consequently for trips elsewhere in London. In the longer term this could produce additional air quality benefits.
- 7.11.27 While not regarded as a pollutant in terms of air quality, carbon dioxide (CO₂) is an important 'greenhouse gas' and hence a contributor to climate change. The reduced traffic levels which would follow the introduction of the proposed scheme are expected to yield a 1% or 2% reduction in the total CO₂ emitted from road transport within Greater London.

Other emerging strategies

- 7.11.28 The proposed scheme will assist aspects of other Mayoral Strategies. In particular, reduced congestion inside the charging zone would support the aims of the Culture Strategy; and reductions in traffic levels would assist the Energy Strategy and offer opportunities for local initiatives in support of the Ambient Noise Strategy.

7.11.29 TfL's recommended modification to the Scheme Order – following the December 2001 consultation – to end charging at 6.30pm rather than 7.00pm, could assist central London cultural activities.

7.12 Equalities

7.12.1 The scheme has been developed having regard to the principle of equality of opportunity. There are many features and impacts of the scheme that will help to promote equality of opportunity.

Process

7.12.2 A number of opportunities have been provided for the public, specific groups and organisations to participate in the development of the scheme, as described in detail in chapter 3. The consultation on the scheme was made accessible to a wide range of Londoners. Details of the consultation were advertised through a variety of methods such as local radio and newspapers (including specialist media); an exhibition was run where the proposals could be discussed directly with TfL staff and two public meetings were held.

7.12.3 The proposals were also available in Bengali, Chinese, Greek, Gujarati, Hindi, Punjabi, Turkish and Urdu, to take account of the diversity of Londoners who may wish to give their views about the scheme. The proposals were also available in Braille, large print, and as an audiocassette. Responses to the proposals were accepted though both post and email.

7.12.4 Around 500 stakeholder groups have been involved in the consultation process. Detailed information packs were sent to stakeholders at the start of both the July and the December 2001 consultations. Stakeholders included:

- all the London boroughs;
- all London MPs and MEPs;
- groups of disabled people and those representing their interests;
- NHS Trusts and health authorities;
- public transport interests;
- environmental and transport pressure groups;
- trade unions;

- taxi and minicab organisations;
- organisations representing pedestrians and cyclists;
- business interests;
- motoring, road haulage and motorcycling organisations; and
- groups representing the interests of voluntary bodies, the latter including those representing elderly people, black Londoners, children, women and childminders.

7.12.5 Meetings have been held regularly with some groups including those representing the interests of disabled people, the NHS London Regional Office and NHS trusts and resident's groups.

- 7.12.6 In order to analyse consultation responses effectively, they were categorised into 34 themes which were then further divided into sub-themes. Particularly relevant to equalities issues are the exemptions and discount themes (see next paragraph) and the social and economic impacts theme which includes sub-themes for cost of living, equity, health, property prices, quality of life, regeneration and vulnerable groups. Thus all these issues were specifically addressed during development of the scheme proposals.
- 7.12.7 During the development of the scheme, considerable attention has been given to the issue of exemptions and discounts, many of which have implications for equal opportunities. A large number of suggestions have been made for exemptions and discounts. Each of these has been considered on its merits and in relation to the overall objectives of the scheme. A number of new or extended exemption and discount categories have been added since July 2001: for example certain NHS staff,; firefighters on specific journeys; London licensed minicabs; buses with 9 or more seats; and the Greater London geographical restriction removed from many categories.
- 7.12.8 Other suggestions have been carefully considered but are not recommended; for example various new proposals for exemptions and discounts; including buffer zone residents; or creating discounts for vehicles used by carers, charity workers, elderly people, key workers, or vehicles used for religious purposes.

Features and impacts of the scheme

- 7.12.9 The key features and impacts of the scheme which would particularly help promote equal opportunities are:
- the range of exemptions and discounts;
 - the complementary transport measures;
 - the effect on bus operations;
 - the General Plan for use of the net proceeds;
 - extensive monitoring of the scheme; and
 - scheme operations and publicity.

Exemptions and discounts

- 7.12.10 The scheme includes a wide variety of exemptions and discounts, many of which would be particularly beneficial in promoting equal opportunities. Some of these benefit potentially vulnerable groups who may have otherwise experienced inequitable impacts caused by the scheme.
- 7.12.11 The private car is one of the main forms of door-to-door transport for disabled people with mobility problems. Being able to drive to a destination is vital as a part of promoting equality for disabled people. Disabled persons would benefit from the 100% discount for individual and institutional Blue Badge holders. They would also benefit from the exemption for vehicle-excise-duty-exempt vehicles used by or for carrying disabled persons and other discounts e.g. community buses.

- 7.12.12 Members of disadvantaged groups are more likely to be non car owners and they would benefit, along with other non car owners, from the exemptions and discounts provided for all public service vehicles with more than nine seats (including buses, minibuses and coaches) community buses, buses operated by charities and non-profit making organisations, London licensed taxis, minicabs and motorcycles. Cyclists and walkers would also benefit from improved conditions resulting from reduced congestion and reduced traffic levels, particularly in the charging zone and on radial routes in inner London.
- 7.12.13 Taxis are a vital part of London's integrated transport network. They form a unique link between other forms of transport, fulfilling needs that cannot be met by the bus, train or tube. They have a significant role in the proposed scheme by providing an important means of moving around central London. Many women feel safer using taxi services, which take them door to door at night rather than using other public transport. Taxis also have an important role in providing door to door transport for disabled people, especially through the Taxicard scheme. London taxis are the only form of social transport that is 100% wheelchair accessible.
- 7.12.14 Residents within the charging zone would benefit from the 90% discount and from improvements to public transport within the zone.
- 7.12.15 Except for taxis and minicabs, all restrictions of the geographical scope of exemptions and discounts to Greater London have now been removed and many have been extended to European Union or European Economic Area countries.
- 7.12.16 Providers of health services would benefit from the reimbursement scheme for certain NHS staff carrying out specific duties and the exemption for ambulances and health service vehicles. Some of the functions provided by borough operational vehicles, which receive a 100% discount, help promote equal opportunity e.g. meals on wheels, schools transport.

Complementary transport measures

- 7.12.17 The scheme is complemented by a range of measures (described in chapter 8) designed to make public transport and other alternatives to car travel, particularly buses, easier, cheaper, faster and more reliable. Bus improvements are particularly important in promoting equality because the majority of regular bus users (70%) do not own or have access to a car, and bus use is highest amongst certain groups. These measures would thus be particularly beneficial for women, older people, young people, low income groups, inner London residents, non car owners, shift and night workers, ethnic minorities and bus operating staff. The measures to improve security on buses and at bus interchanges (also described in chapter 8) will be of particular benefit to women.

The effect on bus operations

- 7.12.18 40% of bus journeys within London are on routes which serve central London – their journey times and reliability are severely impeded by traffic congestion – the reductions in congestion (time spent delayed in traffic) both within the charging zone and in the area

outside will help improve bus journey times and reliability which will be of particular benefits to the same groups listed above.

The General Plan for the use of the net proceeds

7.12.19 The net proceeds of the scheme are estimated prudently to be at least £130 million per year. This has to be spent on relevant transport purposes for at least the first ten years. The General Plan for applying this net revenue, which has to be approved by the Secretary of State, includes several areas of expenditure which would assist in promoting equal opportunities. These include:

- bus network improvements (helping particularly groups mentioned above);
- accelerating or extending accessibility improvements (helping particularly disabled persons and mobility impaired persons);
- interchange improvements (helping particularly groups mentioned above);
- contributing to the costs of developing possible tram or high quality segregated bus schemes (potentially helping particularly groups mentioned above and residents in deprived areas);
- safety and security improvement schemes (helping particularly women, ethnic minorities, children, public transport users);
- increasing late night public transport (helping particularly shift and night workers and young people); and
- restructuring fares on public transport (helping particularly low income groups).

Monitoring

7.12.20 The impacts of the scheme will be monitored through a comprehensive monitoring programme. This will include monitoring of the impacts the scheme has upon traffic levels, public transport, the economy and specific businesses and organisations, the quality of the environment along with the impacts upon London's economy.

7.12.21 In conjunction with external special advisors, TfL are also developing a social impacts monitoring programme. This will consist of a series of surveys which will identify any inequitable impacts of the scheme. Where appropriate, this work will allow TfL to alleviate any disproportionate impacts the scheme may have upon particular individuals or groups. This could take account of any particular concerns identified prior to the start of charging e.g. ethnic minority businesses located around the charging zone boundary.

7.12.22 Monitoring will include reviewing issues such as ease of purchase and the impact of the registration fee for discounts to assess equalities matters.

Operations

- 7.12.23 Prior to the scheme starting, there would be an extensive publicity campaign which would, inter alia, aim to ensure that all London residents and workers were aware of the key aspects of the scheme including charging days and times, how to buy licenses, entitlement to exemptions and discounts and how to obtain them. Visitors would also be targeted. There would be special arrangements to target those entitled to exemptions and discounts.
- 7.12.24 The enforcement regime proposed for the scheme is designed to ensure a very high level of compliance and to ensure that persistent evaders are caught. There will be safeguards before penalty charge notices are issued (e.g. manual checks of camera images) to avoid mistakes. There will be a system of representations and appeals ultimately to an independent adjudicator to ensure independence and fairness. This will help to ensure that those who pay the charge are not subsidising those who evade the scheme.
- 7.12.25 Providing equal opportunity of access to the scheme has been fundamental to the design of the systems and processes which will deliver the services to the public. Design considerations have taken two forms:
- Where specific measures have been taken to ensure that essential services are accessible to all. Such measures include providing information about the scheme in multiple languages, in large print, braille and audio cassette; providing access to the call centre via textphone and multiple languages; providing the internet service in multiple languages. In addition, customers can nominate to interact with the scheme exclusively by post if they so wish (as post is the most universally available form of communication). Consideration has been given to the design and operation of the discount for vehicles used by disabled people. Information about the discount and who will be eligible will be available in all of the above formats. Those who are eligible for this discount (or their carers or guardians) will be able to apply for the discount by post. Subsequently, the discount holder (or their carers or guardians) will be able to nominate their vehicles by telephone, internet or post.
 - Where the scheme has been specifically designed to provide the public options in how they interact with the scheme. There are six different interfaces; postal, live operator call centre, interactive telephone system, internet, over the counter in small retail outlets and from self-service machines. This number of interfaces has been provided in order to cater for a range of abilities and preferences. For example, those with mobility problems may nominate to use either the telephone or postal channels (or indeed the internet, although it is noted that internet access is not so common amongst lower income groups). The young may prefer to use the internet or automated interactive telephone service. The elderly may prefer to speak to a 'real' person by telephone, or to purchase their licence over the counter in a local shop. This may be especially true of elderly people whose first language may not be English but who have established relationships in their local community shops.
- 7.12.26 Discounted licences can be bought via any of the interfaces. Discount holding customers will not be required to provide 'proof' or evidence when they purchase a licence via any of the interfaces. Discount holders will be contacted one month before the end of their

discount period to remind them of the expiry date of their discount. If they do not wish to re-register for the discount they will be contacted again three days before the discount expires to inform them of the date of expiry.

7.13 Impacts Monitoring

- 7.13.1 The document Monitoring the Impacts of the Scheme dated June 2001 and included with the documents accompanying the Scheme Order remains valid as a broad overview of the proposed impacts monitoring programme for the proposed scheme.
- 7.13.2 Since this document was published, significant progress has been made with implementing the monitoring proposals. For the key traffic and transport impacts, a detailed technical design study has been undertaken by consultants MVA. Completed in late September, this recommended an extensive range of new surveys, designed to complement, and derive maximum value from, the wealth of existing transport monitoring activity in London.
- 7.13.3 Further design work has been undertaken internally on the monitoring programmes for social and environmental impacts, drawing on several external specialist advisers.
- 7.13.4 Two major fieldwork contracts have been awarded. A contract to undertake a programme of new traffic and transport impacts surveys, and to collate relevant monitoring data from third-party sources, was awarded to a consortium led by consultants MVA in October 2001. A contract to undertake a programme of economic and business impacts surveys was let to a consortium led by consultants Steer, Davies and Gleave in November 2001. Fieldwork under both contracts commenced in January 2001.
- 7.13.5 Procurement of necessary resources to undertake social and environmental impacts monitoring is proceeding, with the objective of having full capabilities across all areas of the monitoring programme in place by March 2002.
- 7.13.6 The monitoring programme includes preparation of a definitive, published, annual report. The first Annual Monitoring Report is planned to be available in March or April 2002, if the Mayor were to confirm the Scheme Order in February 2002. This will comprehensively summarise the rationale and content of the monitoring programme.
- 7.13.7 The Annual Monitoring Report would provide the basis for further engagement with those interested in the detail of the monitoring programme, including the Greater London Authority's Congestion Charging Scrutiny Panel and London Boroughs.
- 7.13.8 Work continues to refine the monitoring programme in the light of emerging aspirations, suggestions and concerns. Discussions with Boroughs on details of traffic flow monitoring are under way and a number of specialist advisers are assisting with the design of specific surveys.
- If the Mayor decides to confirm the Scheme Order it is expected that there will be a period of 12 months before charging commences. Fieldwork under all the various contracts would intensify during this period to ensure that the various survey methodologies are satisfactory and to ensure that sufficient baseline data is available to allow the effects of the proposed scheme to be adequately assessed.

- 7.13.9 A feature of the monitoring programme would be the use of selected enforcement and other cameras to gather information on vehicle journey times and hence congestion levels. Planned camera locations within the proposed charging zone would be supplemented by additional sites outside the charging zone, to obtain matching records of the registration numbers of vehicles travelling into and around the charging zone.
- 7.13.10 This data would be made anonymous to avoid any suspicion that individual vehicles were being 'tracked'. The facility should produce accurate data on the changes in traffic conditions inside and outside the proposed charging zone. Otherwise, the monitoring programme has no direct implications for the design or operation of the proposed scheme. Monitoring will be used for further development of the proposed scheme and the design of modifications if necessary.
- 7.13.11 Monitoring will include reviewing issues such as ease of purchase and the impact of the registration fee for 100% discounts, in particular to assess equalities matters.

Chapter 8 Developments since July 2001 consultation – complementary transport measures

8.1 Introduction

- 8.1.1 This chapter provides an updated assessment of Section 9 of the documents issued with the Scheme Order in July 2001 to support public consultation, which covered the various public transport measures that would complement the introduction of a congestion charging scheme into central London.
- 8.1.2 It provides a summary of the position at January 2002, paying particular attention to the development of bus service improvements. Improved bus services will deliver increases in overall public transport capacity and attract passengers from overcrowded underground and rail services, thereby easing the travel situation for those drivers who decide to switch from cars to public transport for journeys into the charging zone, as well as for existing passengers.
- 8.1.3 Where this chapter discusses the timing of the introduction of congestion charging in relation to other transport measures, it is assuming that congestion charging would be introduced in February 2003.

8.2 Accommodating congestion charging

- 8.2.1 Chapter 7 explained that net transfers to public transport of inbound car users to the charging zone in the critical period 7.00am to 10.00am under the higher sensitivity projection could be up to 20,000 additional passengers using public transport across the boundary of the charging zone. This figure involves car users transferring predominantly to rail and underground services for longer journeys and partially replacing shorter distance rail and underground passengers transferring to bus. This transfer will be supported by the public information campaign to promote the bus network and improvements to bus services.
- 8.2.2 The overall scale of change is relatively modest: a 1% or 2% increase – perhaps up to 3% in some sectors. About three-quarters of the total additional passengers are expected to travel by bus. The total additional 14,000 or so bus passengers across the boundary of the charging zone, expressed in terms of the levels observed in 2001 coming in to central London in the Central Area Peak Count (see section 8.3) cordon would represent an increase of 15-20%. About half of these – perhaps 7,000 – would be expected to arrive in the peak hour, 8.00am to 9.00am.
- 8.2.3 The 5,000 net additional rail and underground passengers represents an increase of only 0.5% on existing levels. Given that there is very little spare capacity on many rail and underground services, it is important to ensure that there is sufficient bus capacity to cater for the changes in travel described above. Congestion charging itself will create effective additional bus capacity by reducing congestion and allowing quicker and more reliable services. This will improve the relative attractiveness of the bus. Nevertheless, if the Mayor confirms the Scheme Order, TfL is planning to ensure that additional bus capacity is in place ahead of congestion charging being introduced and that bus services will

provide a more attractive alternative to many former car users.

8.3 Transport trends

- 8.3.1 The Central Area Peak Count (CAPC) is a survey that has been conducted in the autumn each year since 1956. It is a census of passengers entering central London, which is taken at approximately equivalent to the boundary of Fare Zone 1, an area somewhat larger than the charging zone, during the weekday morning peak period 7:00am to 10:00am.
- 8.3.2 Travel into central London during the peak period has been surveyed since 1956. Fluctuations in recent years are primarily due to changes in public transport usage. Personal transport (car, motorcycle, pedal cycle, taxi) levels have changed little during this time.
- 8.3.3 Estimates of people coming into central London reached a low of 0.98 million in 1993. The highest recorded number entering central London was 1.26 million in 1962. Table 1 below shows the data for 1998, 1999 and 2000.

	1998	1999	2000
National Rail (SE)	422	434	438
National Rail (Inter City)	25	26	27
Total National Rail	448	460	465
Gross London Underground	547	555	568
Less also counted on National Rail /Docklands Light Railway	196	201	189
Net London Underground	351	354	378
Docklands Light Railway	9	9	11
Total Rail	808	822	854
TfL local Bus	68	68	73
Coach/Minibus	17	15	15
Total Public Transport	892	905	942
Cars	140	135	137
Motor Cycles	13	15	17
Pedal Cycles	10	12	12
Taxis	8	8	8
Total Personal Transport	171	169	173
Total people entering Central London	1063	1074	1115

Table 1: Passenger traffic in thousands entering central London during the morning peak period, 1998 to 2000

Note: Travel by rail in this period is at historically high levels. Travel by underground is close to historically high levels. Preliminary data indicates that the figure for local bus passengers in 2001 is 81,000, but this is well below historic levels: in 1981 105,000 people arrived in central London by LT bus. Although capacity levels have always been

adjusted according to demand, this indicates that there is considerable scope to carry more people into central London by bus.

Factors influencing the attractiveness of bus services

- 8.3.4 Each weekday 6,000 London buses carry four and a half million passengers on 600 different routes. There has been significant network expansion and, despite deteriorating reliability of services up to the recent past, the numbers of bus passengers has risen 22% since 1993/4. With the current steady expansion in the quality and extent of the network then these numbers will grow more.
- 8.3.5 Traffic congestion has a seriously adverse impact on bus operations, causing delay, unreliability and unpredictable arrivals. The Mayor's Transport Strategy is tackling this problem and will transform the bus network into a service that will be regarded as 'first class' and the first choice for many of the journeys people make.
- 8.3.6 The Transport Strategy contains various policies, proposals and programmes to transform London's bus system which are being implemented. Examples of these include:
- capacity enhancements – an expanded bus network, sufficient to meet growing demands;
 - quicker and more reliable – more bus priority and better enforcement, London Bus Initiative;
 - more convenient – new services, including 24-hour services buses;
 - accessible – already over half of London's buses are low, floor accessible buses – making it easier for people to get on and off, especially those with wheelchairs, small children, buggies and heavy shopping;
 - comfortable – improvements to bus shelters, better driver training;
 - clean – new standards for cleanliness;
 - easier to use – better quality, more comprehensive, easier to understand information;
 - safer to use – better personal security; and
 - affordable – fares restructured and simplified, improved ticket options.
- 8.3.7 Already there is a discernable trend in bus improvements. The Mayor intends that there will be a noticeable improvement in London's bus operations ahead of a congestion charging scheme being introduced into central London. Each area of improvement is discussed below.

8.4 Expansion of the Bus Network

- 8.4.1 A report entitled Proposed Bus Network Enhancements Complementary to Congestion Charging by Peter Hendy, Managing Director of TfL's Surface Transport Directorate, was

submitted to the GLA Transport Policy and Spatial Development Committee on 31 August 2001. This report set out the bus service enhancements as then proposed to complement the introduction of the congestion charging scheme. Work to develop these enhancements has continued since that time and an updated list of route-by-route bus service enhancements is attached in full at Annex E4.

- 8.4.2 TfL London Buses continues to work very closely with TfL Street Management's Congestion Charging Division to ensure that any refinements made to the transport modelling or changes in assumptions are fully reflected in all bus service planning work.
- 8.4.3 Details of the proposed service changes are outlined in the report referred to in paragraph 8.5.1 and Annex E4. However, in summary, congestion charging is anticipated to result in up to 7,175 additional bus passengers crossing the charging zone boundary in the peak hour. The current plans will provide over 11,000 extra peak passenger spaces, in excess of the anticipated extra demand. This caters for the current demand growth in addition to the impact of the scheme. Midday, evening and weekend frequencies for all those routes were reviewed at the same time as the peaks and in a significant number of cases will be enhanced with the peak proposals detailed in the above report. In addition, significant increases in frequency and expansion in coverage of the nightbus network will continue.
- 8.4.4 Bus service capacity enhancements will be achieved through a combination of higher frequencies, bigger buses and new routes. The new routes being developed include:
- 148 (Camberwell – Shepherds Bush, via Parliament Square and Victoria);
 - 205 (Paddington – Whitechapel, via Euston Road);
 - 360 (Elephant & Castle – South Kensington, via Vauxhall);
 - 388 (Hackney (Victoria Park) – Mansion House via Bethnal Green);
 - 414 (Putney Bridge – Maida Vale, via Fulham Road, Park Lane and Edgware Road); and
 - The Riverside Link, which will provide new bus service links from the South Bank area to Aldwych/Covent Garden and Tower Hill.
- 8.4.5 Other improvements in central and inner London include:
- additional capacity on many nightbus routes; and
 - introduction of articulated buses on bus routes 507 and 521, planned for mid 2002, providing additional capacity at Victoria, London Bridge and Waterloo. Plans to use similar vehicles along parts of route 36 and 53 (as routes 436 and 453) are being developed for introduction later in 2002 or early in 2003.
- 8.4.6 As well as additional capacity in inner and central London, improved services are being provided in outer London. Some of these will support congestion charging. Typical changes include additional capacity, later last buses, new links and other service and reliability improvements. Areas where improvements were introduced in autumn and

winter 2001 included Romford and Orpington. Outer London town centres where major improvements are planned for introduction during 2002, subject to consultation, include Ealing, Sutton, and Kingston.

8.4.7 The number of suburban services with 24-hour operation along their full length is increasing and expansion in coverage of the night-bus network is set to continue. Orbital night bus services are also being introduced, subject to consultation, including:

- Route N93 Putney – Wimbledon-Morden-North Cheam, introduced in late 2001;
- Route N75 Lewisham – Croydon; and
- Route N65 Ealing – Kingston.

8.5 London Bus Initiative

8.5.1 The London Bus Initiative, or 'BusPlus' aims to make the experience of travelling by bus more attractive to more people by delivering a real change to the quality of London's key bus routes. A total of 70 key bus routes across London will be upgraded to make them more reliable, safer, cleaner and more comfortable than ever before.

8.5.2 The programme of BusPlus improvements will include:

- bus priority measures, including designated bus lanes and traffic signals which recognise when a bus approaches;
- tougher enforcement of bus lane and bus stop infringements, using cameras, CCTV, traffic wardens and parking attendants;
- 'Countdown' – the real time information system which tells bus passengers when the next bus is due;
- changes to kerbs to allow passengers to benefit from the new low-floor buses;
- improvements to bus shelters, including better lighting, cleanliness and seating;
- extra training and a better working environment for bus drivers;
- safer and more convenient crossings near bus stops;
- real time information for bus operators, giving the location of each bus, to help them control the route and make bus arrivals more regular; and
- new buses.

8.5.3 The 70 BusPlus routes have been chosen because they are some of the busiest in London – carrying more than 2.5million people each day. These routes were also selected to ensure that high quality complementary measures are in place prior to the introduction of the proposed congestion charging scheme.

8.5.4 The BusPlus programme is being carried out in two phases. The first phase, involving an initial 27 key routes, is already underway and will be completed before the introduction of congestion charging. Twelve of the 27 BusPlus routes cross or run alongside the congestion charging zone boundary and details of these are outlined in Table 2 below.

8.5.5 The second phase of the BusPlus programme was announced in August 2001 and will involve a further 43 key bus routes across London. The improvements to the 20 key bus routes which either cross or run alongside the congestion charging zone boundary will be completed before the introduction of congestion charging and details of these routes are outlined in Table 2 below.

Route	Route Description	LBI 1/2
12	Notting Hill Gate – Oxford Circus – Dulwich	LBI 1
14	Putney Heath – South Kensington – Tottenham Court Road	LBI 2
15	East Ham – Poplar – Paddington	LBI 2
16	Cricklewood – Victoria	LBI 2
17	Archway Station – London Bridge Station	LBI 2
18	Euston – Sudbury ‘Swan’	LBI 1
25	Ilford – Oxford Circus	LBI 2
29	Trafalgar Square – Camden Town – Palmers Green	LBI 1
30	Hackney Wick – Marble Arch	LBI 2
31	Camden Town – Chalk Farm – Notting Hill Gate	LBI 2
35	Clapham Junction – Elephant & Castle – Shoreditch	LBI 2
36	Queen’s Park Station – Victoria – Lewisham	LBI 2
38	Victoria – Clapton	LBI 1
43	Friern Barnet – Moorgate – London Bridge Station	LBI 2
47	Shoreditch – Lewisham – Catford	LBI 1
52	Willesden – Kensington – Victoria	LBI 2
53	Oxford Circus – New Cross – Plumstead Common	LBI 2
55	Leyton Baker’s Arms – Hackney – Oxford Circus	LBI 1
63	Crystal Palace – Elephant & Castle – King’s Cross	LBI 2
68	Euston – Elephant & Castle – West Norwood	LBI 1
77A	Wandsworth – Trafalgar Square – Aldwych	LBI 2
78	Shoreditch – Tower Bridge – Nunhead	LBI 2
82	Victoria – St John’s Wood – North Finchley	LBI 2
115	Aldgate – East Ham White Horse	LBI 1
133	Liverpool Street Station – Elephant & Castle – Tooting Broadway	LBI 2
134	North Finchley – Muswell Hill – Camden Town – Tottenham Court Road	LBI 1
137	Streatham Hill (Telford Avenue) – Oxford Circus	LBI 2
149	London Bridge – Tottenham – Ponders End	LBI 1
168	Hampstead Heath – Euston – Elephant & Castle	LBI 1
185	Lewisham – Dulwich – Victoria	LBI 1
253	Aldgate – Finsbury Park – Euston	LBI 2
344	Clapham Junction – Elephant & Castle – Liverpool Street Station	LBI 2

Table 2: LBI 1/2 routes that cross or run alongside the central zone boundary

8.5.6 In order to provide an idea of the expected improvements that the LBI ‘Whole Route Approach’ should deliver, the monitoring results from the ‘showcase’ bus route 43 are

discussed. It was found that bus running time improved by 5% over the whole route and by up to 16% on individual sections of the route. An overall 2% improvement in the reliability of bus journey times was found for the whole route and improvements of up to 18% at the farestage level. The Customer Satisfaction Survey also showed improvements in safety and security, cleanliness, comfort and reliability.

8.6 Quicker and more reliable services

- 8.6.1 To evaluate the benefits of using conductors on low-floored double deck vehicles, conductors have been introduced on central London route 55. As part of the trial, over 50 conductors have been introduced to the route from October 2001 to establish whether they speed up services and offer further benefits for passengers.
- 8.6.2 Bus lane enforcement cameras will be in place around the boundary of the congestion charging scheme on all junction approaches to the Inner Ring Road to ensure these bus lanes are adequately protected.
- 8.6.3 The Automatic Vehicle Location (AVL) system will be used to improve the control of bus services, give buses priority over other traffic and provide up-to-the-minute customer information. The information collected also allows more robust scheduling, minimising the effect of congestion on service reliability.
- 8.6.4 Buses are also being given priority to pass through traffic junctions. Selective Vehicle Detection (SVD) units enable buses and traffic light systems to “talk” to each other and so allow buses to take priority at traffic lights. By Spring 2002, the BusPlus programme plans to equip over 480 junctions with SVD units.
- 8.6.5 TfL is currently undertaking a review of Countdown, Automatic Vehicle Location (AVL) and the Bus Radio System to ensure that these systems are fully exploited and the best available information is given to customers.

8.7 Cleaner and more comfortable buses

- 8.7.1 Improvements in pay and conditions for staff, aimed at addressing the current problems of shortages in bus operating staff numbers, are being implemented with the continuation of the TfL Bonus as well as general increases in pay. The bonus will be complemented by other network-wide initiatives that should help ease the pressure of the job, for example better staff facilities, simpler fares and off-bus ticketing, more bus priority and better service management.
- 8.7.2 New Quality Incentive Contracts require bus companies to improve the quality and reliability of services, and to give greater consideration to the needs and comfort of passengers. The new contracts are more openly based on quality and value for money, and include incentives and deductions relating to delivering quality and reliability to targets. The new contracts will raise the profile of performance monitoring at route level. These new contracts commenced roll-out across the bus network in March 2001.
- 8.7.3 TfL is also working with the bus operators to introduce new standards for vocational training of bus operating staff (to include driving skills and customer service) as well as

new tougher standards for cleanliness and presentation of vehicles.

8.8 Security on buses

- 8.8.1 Progress has been made on improving security on buses and at bus interchanges. There will be CCTV on all new buses, and a programme of retrofitting is currently underway. All 27 routes in phase 1 BusPlus will be fitted. The priorities will be determined by where the measures can help passengers and bus operating staff most.
- 8.8.2 Major new initiatives arising from successful joint operations between TfL and the Metropolitan Police are already underway. They are aimed at improving both the actual and perceived personal security of passengers and staff. Some of the initiatives have been brought together as Operation Seneca. This includes increasing provision of CCTV on buses; Revenue Protection Inspectors of London Buses working closely with Police officers to catch people causing vandalism or intimidation of passengers and bus crews; a major schools programme called BUSWISE that educates children on how to use bus services and deters them from involvement in vandalism or violence; and encouraging traffic wardens to use buses to introduce another uniformed presence on the bus. Other measures, such as improved lighting at stops are also helping to improve safety and security.
- 8.8.3 Personal security and safety is a key determining factor for passengers when considering interchanging from one mode of transport to another. Feelings of insecurity deter passengers from using buses at certain times of the day. In association with the British Transport Police and the Metropolitan Police Service, TfL are undertaking a number of demonstration projects to improve personal security in and around transport interchanges.
- 8.8.4 The following seven interchanges have been chosen for the trial projects: Mitcham Junction, Shadwell, Seven Sisters, Clapham High Street, Wembley Central, Hounslow bus station and Lambeth North. The Lambeth North site was chosen specifically to help improve personal security for staff and shift workers at the London Ambulance Service Centre Headquarters (Waterloo Road) and Guys and St Thomas' Hospital as part of the congestion charging proposals.

8.9 Better information, easier to use

- 8.9.1 TfL has redesigned bus timetables and many bus maps to produce spider maps to give people much clearer information about services from the specific stop they are at. It is expected that most bus stops in the central zone will have stop-specific timetables and most of the busier ones, for example, near to major centres and/or Underground and National Rail stations will have spider maps.
- 8.9.2 TfL is also working with London Underground to put these maps inside major stations. The programme will be rolled-out from early 2002 onwards, taking LBI and congestion charging routes as a priority.

8.10 Bus fares

- 8.10.1 As well as a freeze on bus fares from January 2001 for three years, a number of ticketing packages were launched in September 2001 and January 2002, in order to increase the

attractiveness of off-bus purchase tickets. Further details of fares and ticketing are included in Section 8.14.

8.11 London Underground and National Rail services

- 8.11.1 The improvements outlined in the stakeholder pack in July 2001 for the London Underground are still planned to be implemented ahead of the introduction of congestion charging. Details of current initiatives are as follows:
- 8.11.2 Central Line – A new timetable was introduced on the Central Line on 13 January 2002 which aims to reduce passenger journey times, deliver a robust schedule and remove unreliable features of the current timetable, for example reversing at Liverpool Street. The timetable is the first which makes use of the Automatic Train Operation (ATO) run times and will mean that passengers should not have to wait more than three and a half minutes between trains during peak travel time in central London, and no more than ten minutes at other times. A more regular train service can be achieved, with up to a 15% improvement overall in journey time.
- 8.11.3 Northern Line – A new timetable is planned for introduction in July 2002 with improvements to peak shoulders and interpeak service levels (from 13 to 15 trains per hour).
- 8.11.4 Victoria Line – A new timetable is planned for introduction in July 2002 with enhanced Saturday services (18 to 20 trains per hour) with weekday inter-peak improvements to follow in June 2003.
- 8.11.5 Piccadilly Line – A new timetable is planned for introduction in September 2002 which will focus on reliability with more regular services.
- 8.11.6 Bakerloo Line – A new timetable is planned for introduction in June 2002 which aims to improve reliability, help keep trains running to the timetable and reduce the requirement for cancellation and short tripping. Run times should be improved by between ½ and 2 ½ minutes (dependent on time of day) between Queens Park and Elephant & Castle each way.
- 8.11.7 Sub-surface Lines (Circle, District, Hammersmith & City and Metropolitan) – New timetables are planned for introduction in September 2002, which will focus on reliability with improvements to regularity and run times.
- 8.11.8 The National Rail improvements outlined in the stakeholder pack to support public consultation in July 2001 are still planned to be implemented before the introduction of congestion charging. These include various improvements to the frequency of National Rail services into central London by Silverlink, Thameslink and South West Trains. The Strategic Rail Authority is developing new franchise agreements with the train operators, which will deliver significant improvements in the quality of services provided to the passengers. All replacement franchise agreements will commit the franchise to deliver improvements in service levels and journey times, overcrowding and punctuality.
- 8.11.9 New rolling stock is now being provided by three train operating companies on National Rail services serving central London with delivery planned for completion by the end of

2002. Further new rolling stock will follow by the end of 2004. The companies concerned are c2c Rail, Connex Southern Eastern and South West Trains. In addition, Chiltern Railways will be increasing the number of carriages on their trains on longer distance services.

- 8.11.10 The Strategic Rail Authority is working with the train operators to increase the level of investment in new and refurbished rolling stock in line with rising passenger volumes and expectations. In very round numbers, 10,000 carriages will need to be refurbished or replaced over the next decade or so. Some of it, such as the 'slam door' rolling stock dating back to the early 1960s which still comprises much of the stock serving routes south of the Thames, will need to be replaced by the end of 2004.
- 8.11.11 South West Trains has placed a new order for 785 carriages to be delivered by 2004 whilst the New Southern Railway (GoVia) are due to take delivery of around 240 carriages from 2003. Further orders for 750 new carriages from New Southern Railway are expected soon and First Great Eastern will also take delivery of new trains in 2003. As well as improving journey quality, requirements for new rolling stock include provision of toilets for disabled people, and for information about the journey to be provided by audio and visual means.

8.12 Docklands Light Railway

- 8.12.1 The Docklands Light Railway (DLR) has had a key role in creating the new world class financial district in the Isle of Dogs and in facilitating continuing development in Docklands and the regeneration of inner east London. In particular, it also provides links to the City via Bank and Tower Gateway stations. As an addition to the original information supplied in July 2001, and as part of its commitment to ensuring that the DLR infrastructure can accommodate the expected increase in passenger growth, TfL will purchase 24 new railcars by Spring 2002, as well as upgrading the train control system to improve reliability and increase capacity.

8.13 Fares & Ticketing

- 8.13.1 Underground fares were capped in real terms in January 2001 for an initial period of three years, which means that Underground fares will only go up in line with inflation until and including January 2004. In addition, bus fares were frozen in absolute terms from January 2001 for three years. Both of these fares policies have continued to be implemented.
- 8.13.2 Further to the fares and ticketing package launched in May 2001 (outlined in the consultation material in July 2001), two further packages were launched in September 2001 and January 2002 in order to increase the attractiveness of off-bus purchase tickets. These included the following:

September 2001

- Child Bus Saver: a child version of the Bus Saver ticket was introduced which costs £2.10 for a book of six tickets – meaning a single journey will cost just 35p. Child Saver tickets are valid on virtually all London buses, including night buses and have no expiry date, giving the reassurance that a child always has a ticket home; and

- standardisation of night bus fares: adult cash fares on N-prefixed Night buses have been reduced to daytime levels which means that London's adult bus fares are the same 24 hours a day.

January 2002

- The price of the All Zones Bus Pass season ticket was reduced from £9.50 to £8.50 for a weekly ticket. Other bus fares will be frozen. The weekly single zone bus season ticket remains at £7.50;
- all Travelcards became valid across the whole of the London bus network. Zonal restrictions now apply only to rail and Underground travel; and
- introduction of a new All Day Travelcard. This largely replaces the One Day "LT Card" which while valid all day on the underground was not valid on national rail services. The new ticket does not have the morning peak restriction of the old ticket, which continues unchanged as the offpeak Travelcard.

8.13.3 Towards the end of 2002, TfL will begin to introduce smartcard ticketing, initially as an enhancement to the Travelcard Season ticket and then in the form of a new 'Pre Pay' ticketing option which will work similar to a phonecard. The programme to install the hardware and systems needed to support smartcard ticketing is now well advanced and broadly on schedule.

8.13.4 The smartcards themselves will be contactless, containing an embedded radio aerial and micro chip memory capable of recording the validity of a season ticket or a monetary value. Season ticket holders will simply need to hold the card close to a reader to board a bus or pass through a ticket gate on the Underground. Pre Pay users will have their fares automatically deducted by the system as they travel. Many passengers will find Pre Pay a convenient and cost effective alternative to paying cash, single fares. As a result, boarding times on driver operated buses should speed up and queues for tickets on the Underground reduce.

8.13.5 The Mayor's Transport Strategy proposes the introduction of a 70p flat rate bus fare ahead of the introduction of congestion charging. More recent analysis casts some doubt on the benefits of this specific proposal and it is recommended that the Mayor considers further whether this particular proposal is the best way to make bus fares more attractive. TfL is currently working on a Fare Policy review which is considering a wide range of bus fare options in the light of the need to complement congestion charging and deliver the intended traffic cascade from rail to bus. This will report in Spring 2002.

8.14 Illustrative choices facing a car commuter to central London

8.14.1 The introduction of congestion charging would alter the balance between the costs of using a car or public transport for travel to Central London. For example, a car commuter in an area such as Brixton, Zone 2, would face a choice between:

- travel by car with a congestion charge of £5 a day or £25 per week, together with fuel and parking costs;

- an enhanced bus service, now costing £8.50 per week with a Bus Pass; and
- an underground or rail journey costing nearly £20 per week with a Travelcard.

8.14.2 Further south, in Zone 3, a commuter would face a choice between:

- travel by car with a congestion charge of £5 a day or £25 per week, together with fuel and parking costs;
- rail travel using a Zone 3 Travelcard costing nearly £23 per week;
- bus travel (using a Zone 1 or 2 Travelcard, this option could save over £6 per week on a Zone 3 Travelcard) into Zone 1 or 2, using enhanced bus services, followed by a short underground trip; and
- bus travel all the way, costing £8.50 per week with a Bus Pass.

8.14.3 The examples illustrate how recent fares initiatives have sought to tilt the balance of financial advantage towards the bus in order to minimise the net impacts on rail and underground services.

8.15 Public Transport Information

8.15.1 Improving public transport information is one of the quickest and most cost effective improvements that can be made to the transport system. As well as the improvements to the information for bus services outlined in paragraph 8.11, TfL are developing a multi-modal interactive journey planner on their website for all public transport services in London. This is planned to be ready for summer 2002. This will be a particularly useful source for new public transport users.

Chapter 9: Proposed modifications to the Scheme Order: consultation December 2001

9.1 Introduction

- 9.1.1 As a result of the representations and objections received during the consultation on the Scheme Order in July 2001, developments arising from the Technical Design Study and other considerations described in this report, TfL undertook further consultation on various proposed modifications to the Scheme Order in December 2001. The consultation arrangements are described in Chapter 3.
- 9.1.2 This chapter provides a description of each of the proposed modifications consulted on in December 2001. The representations and objections leading to these modifications are detailed in Chapter 5 and Annex D and the background to the Technical Design Study and other developments is set out in Chapter 6.
- 9.1.3 The representations and objections received as a result of the consultation on these proposed modifications are described in Chapter 11 and Annex G.

9.2 Proposed modifications arising from the consultation commencing in July 2001

Days and Hours of Operation

- 9.2.1 Charging hours to be 7.00am to 6.30pm; instead of 7.00am to 7.00pm.

Payment Method

- 9.2.2 'Carnet Licences' to be introduced to allow charges to be paid through the issue of undated licences purchased in advance and subsequently validated for use on particular days.
- 9.2.3 The arrangements for fleet operators to be amended:
- to provide separate arrangements for goods vehicles and for cars and light vans;
 - to include leased and hired vehicles;
 - to require registration under each agreement of at least 25 vehicles;
 - to allow TfL to charge up to 115% of the standard daily charge for this facility; and
 - to include an initial charge of £10 per vehicle under such agreements.

Alternative Fuel Vehicles

- 9.2.4 The 100% discount for mono-fuelled gas vehicles to be extended to all alternative fuel vehicles, registered or eligible to be registered, to specific groups in the TransportAction PowerShift database i.e. meeting the required emission standards (based on the Euro III and Euro IV standards).
- 9.2.5 The requirement for certain alternative fuel vehicles to be registered and operated from a Greater London address to be removed.

Borough Operational Vehicles, Royal Parks Vehicles

- 9.2.6 The provision that there be an upper limit on the number of certain borough operational vehicles eligible for a 100% discount to be removed.
- 9.2.7 Royal Parks Agency operational vehicles to be treated in a manner comparable to qualifying borough operational vehicles, i.e. registered vehicles will receive a 100% discount.

Breakdown and Recovery Vehicles

- 9.2.8 The 100% discount for specially adapted recovery vehicles to be extended to vehicles constructed, adapted or equipped to provide roadside assistance or recovery services and operated by an accredited recovery organisation.
- 9.2.9 The requirement for certain recovery vehicles to be registered and operated from a Greater London address to be removed.

Vehicles used by disabled people

- 9.2.10 The requirement for vehicles used by disabled Blue Badge holders to be registered and operated from a Greater London address to be removed.

Emergency service vehicles

- 9.2.11 The requirement for certain vehicles used for fire, police and ambulance purposes to be registered and operated from a Greater London address to be removed.
- 9.2.12 HM Coastguard and lifeboat haulage vehicles and Port of London Authority operational vehicles to be eligible for a 100% discount. Certain lifeboat vehicles exempt from VED to be exempt from charging.

Public Service Vehicles

9.2.13 The exemption for public service vehicles with 17 or more seats to be extended to buses with 9 or more seats.

9.2.14 Vehicles operated under section 19 of the Transport Act 1985 and community buses to be eligible for a 100% discount: with comparable arrangements for vehicles from Northern Ireland

Royal Mail Vehicles

9.2.15 The removal of the 100% discount for Royal Mail liveried vehicles

Residents' Vehicles

9.2.16 The eligibility for residents' discount is to be restricted to residents aged 17 years or over.

9.2.17 Residents of the proposed residents' discount zone to be restricted to registering one vehicle at any one time for the 90% discount.

Residents in specific locations adjacent to the boundary

9.2.18 In three small areas inside the Inner Ring Road but outside the central zone boundary, residents are to be eligible for the residents' 90% discount.

Vehicles used by firefighters

9.2.19 The introduction of a provision for a 100% discount for vehicles used by firefighters for operational travel between London fire stations.

Vehicles used by certain NHS staff

9.2.20 The introduction of a provision for a 100% discount for vehicles used by NHS staff who need to use their cars to carry controlled drugs, confidential patient records, bulky, heavy or fragile equipment or other specified material.

Private Hire Vehicles (minicabs)

9.2.21 Private hire vehicles (minicabs) to be eligible for exemption, once fully licensed under the London licensing system and the vehicle has been hired.

Scheme Operation

9.2.22 The charge may be 'pre-paid' 65 charging days in advance of the relevant charging day; rather than 56 calendar days.

9.2.23 The charge may be paid at the standard rate of £5 until 8.00pm; rather than 7.00pm.

9.3 Proposed modifications to the Scheme Order arising from the Technical Design Study and other considerations

Vehicles used by disabled people

9.3.1 Clarification that Blue Badge holders 100% discount be limited to 2 vehicles per day

9.3.2 Blue Badge holders whose badge expires during the discount registration period to be offered the option to pay £10 when submitting proof of a new badge and to extend their discount registration period for one year.

9.3.3 Institutions in receipt of a Blue Badge to be treated in a comparable manner to individual Blue Badge holders.

Residents' Vehicles

9.3.4 Requirement for residents to notify TfL of a change of address within the residents' discount zone and to confirm continued eligibility.

9.3.5 Provision that a discounted licence becomes void if the applicant is ineligible.

Boundary

9.3.6 The central zone boundary to be adjusted at Mount Street, off Park Lane.

Scheme Operation

9.3.7 A requirement to be introduced that complete applications for discount status must be received at least 10 charging days before the first charging day.

9.3.8 A requirement that complete applications for discount status starting within 3 months of the start of the scheme must be received at least 20 charging days before the first charging day.

9.3.9 The period for individual discount registrations initially to be between 12 and 15 months, to stagger the renewal of registrations.

9.3.10 The requirement to be removed that proof of different address from that previously provided by the licence purchaser is needed for a licence refund.

9.3.11 The requirement to be introduced that postal applications requesting amendments must be received 7 charging days in advance and telephone applications 3 charging days in advance.

9.3.12 The provision for an amendment to a licence to allow an earlier charging date is to be added.

- 9.3.13 The provision to be introduced to ensure that, if TfL does not receive proper payment, the licence being purchased is void or the entry in the discount register is removed.
- 9.3.14 Vehicles to be removed from the discount register 7 charging days after a change of keeper unless renewed.
- 9.3.15 Vehicles to be removed from the discount register and notification to be given by TfL if eligibility ceases.
- 9.3.16 90% resident discount licences purchased improperly (e.g. using a stolen credit card) to be void.

Military Vehicles

- 9.3.17 Requirement that eligible military vehicles be registered with TfL to be eligible for 100% discount, rather than being exempt.

Use of Net Revenues

- 9.3.18 The estimate for the scheme's net revenues quoted in the Scheme Order to be revised to £130 million per year.

Project timetable

- 9.3.19 The date in the Scheme Order for the start of charging is to be changed from 14 months after confirmation to 12 months after confirmation of the Scheme Order; and the date for other parts of the Scheme Order coming into effect to be changed from 9 months after confirmation to 8 months after confirmation.

Vehicles from Northern Ireland

- 9.3.20 A provision to be introduced to define certain discount categories for vehicles registered in Northern Ireland.

Europe

- 9.3.21 Extension to vehicles from Member States of the European Union or European Economic Area of discounts and exemptions for vehicle excise duty exempt ambulances, invalid carriages and vehicles used for the carriage of disabled people by a recognised body, buses with nine or more seats, and recovery and accredited breakdown vehicles. Extension of Blue Badge discount to holders of equivalent badges in European Union states. Extension of the fleet account facility to vehicles registered in European Economic Area states.

Other minor changes

- 9.3.22 A number of minor changes to improve the clarity and structure of the Scheme Order, and to correct errors and omissions.

Chapter 10: Analysis of representations received to the December 2001 consultation

10.1 Introduction

- 10.1.1 This chapter summarises the representations and objections received to the December 2001 consultation on the proposed modifications to the Scheme Order. A full report is at Annex F.
- 10.1.2 A total of 533 representations were analysed, broken down by respondent type as follows:
- 84 representations from 'stakeholders', i.e. from the 500 key organisations who were originally sent the made Scheme Order and supporting information in July 2001;
 - 97 representations from 'other organisations' that responded on behalf of the interests of a wider group, for example businesses, residents' associations, etc; and
 - 352 representations from individual members of the public.

10.2 Overall reactions to the proposals

- 10.2.1 The detailed report at Annex F shows that only half of all respondents to this round of consultation stated their support or opposition to the congestion charging scheme. In many cases it was not possible to say with certainty whether a respondent supported or opposed the congestion charging scheme.
- 10.2.2 In this round of consultation there is a potential skew towards those who oppose the scheme or whose concerns have not been addressed by the proposed modifications. Some of those who responded to the first consultation may not have felt the need to add to their representation; particularly if their concerns about the scheme had now been met, or if they were supportive of congestion charging and did not wish to comment further. TfL considers therefore that there can be no clear conclusion drawn from this consultation as to the overall level of support or opposition to the scheme. Of greater interest, however, is the generally widespread support for the majority of TfL's proposed modifications to the Scheme Order.
- 10.2.3 The issues addressed by respondents are shown below, commencing with reactions to the proposed modifications to the Scheme Order. The balance of support or opposition to the modifications is indicated, and any reservations or reasons for opposition are noted.
- 10.2.4 However, most respondents to the consultation discussed aspects of the congestion charging scheme other than the proposed modifications. These points are also identified below, focussing on reasons for opposition to or concern over the proposals. The numbers of respondents commenting on each of the themes is given along with salient points identified. This analysis is not exhaustive but indicates the more significant issues.
- 10.2.5 An overview of TfL's consideration of all the representations made during the December 2001 consultation is presented in chapter 11. Annex G provides TfL's detailed consideration of all the representations made during the December 2001 consultation.

10.3 Proposed Modifications to the Scheme Order

10.3.1 A summary of the representations received on the proposed modifications to the made Scheme Order is presented below. As far as is possible this is done in order of importance across respondent types in terms of the number of respondents raising them. However, given the different priorities of the three respondent types, this cannot be done precisely.

10.3.2 Proposed Modification - Charging hours – to end at 6.30pm rather than 7.00pm

20 Stakeholders 8 Other Organisations 23 Individual Members of the Public

- balance in favour of the reduced charging hours;
- concerns that congestion is still a problem at 6.30pm, or that a rush will occur at that time; and
- concern that 6.30pm is still too late for people to drive to the theatre.

10.3.3 Proposed Modification - New discount for operational travel by certain NHS staff

23 Stakeholders 4 Other Organisations 11 Individual Members of the Public

- balance in favour of the discount;
- concerns about possible abuse;
- concerns from the NHS about the costs of administering the discount;
- calls for the discount to be extended to other staff/journeys, particularly the journeys to work; and
- calls for the discount to be extended to non-NHS medical practitioners.

10.3.4 Proposed Modification - New exemption for London licensed private hire vehicles (minicabs)

14 Stakeholders 4 Other Organisations 9 Individual Members of the Public

- balance in favour of the new exemption - perceived to be logical and fair given the exemption for black cabs; and
- concerns about enforcement of the condition that the vehicle is 'hired'; and about teething problems for the new minicab licensing system impacting on the congestion charging scheme.

10.3.5 Proposed Modification - Extension of eligibility for alternative fuel discount

11 Stakeholders 7 Other Organisations 3 Individual Members of the Public

- balance in favour of the modification – providing a more practical incentive to use cleaner fuels;
- some calls for eligibility to be widened further, particularly to clean diesel; and
- some opposition on the basis that the extension is inconsistent with the key objective of the scheme of reducing congestion.

10.3.6 Change to estimated net revenues – Annex 2 of the Scheme Order

14 Stakeholders 2 Other Organisations 3 Individual Members of the Public

- concerns that part of the justification for the scheme is undermined; and
- calls for more information about why the estimate has changed so substantially.

10.3.7 Proposed Modification - Extended geographical eligibility for Blue Badge 100% discount

14 Stakeholders 2 Other Organisations 1 Individual Members of the Public

- balance in favour of the modification; considered to be logical and equitable; and
- some serious concerns about increased risk of abuse, misuse and fraudulent use of the Blue Badge with corresponding concerns about adverse impact on the congestion charging scheme.

10.3.8 Proposed Modification - Extension of PSV exemption to public service vehicles with more than nine seats and new discount for buses operating under Section 19 permits and community buses

14 Stakeholders 2 Other Organisations 1 Individual Member of the Public

- balance in favour of the modification – benefit to voluntary/community groups.

10.3.9 Proposed Modification - Change to post payment arrangements - £5 payable until 8pm

11 Stakeholders 3 Other Organisations 11 Individual Members of the Public

- balance in favour of the modification – will assist those making unexpected journeys;
- some call for the £5 post payment period to be extended further; and
- some confusion expressed – some respondents thought that £10 would be charged to drive between 8pm and midnight.

10.3.10 Proposed Modification - Revised arrangements for fleet operators

11 Stakeholders 3 Other Organisations 2 Individual Members of the Public

- reservations about the form of the proposed arrangements for fleet operators;
- concerns about the 115% surcharge – 110% was proposed by many; and the annual £10 charge;
- calls for the 'decrementing' system to be extended to light vans and small businesses with fleets of less than 25 vehicles; and
- requests for further actions to mitigate the administrative burden to business.

10.3.11 Proposed Modification - New discount for operational travel by firefighters

9 Stakeholders 2 Other Organisations 9 Individual Members of the Public

- balance in favour of the modification;
- concerns about possible abuse; and
- calls for the discount to be extended to other staff/journeys, particularly the journey-to-work.

10.3.12 Proposed Modification - Extension of eligibility criteria for recovery vehicles' discount

7 Stakeholders 2 Other Organisations 3 Individual Members of the Public

- balance in favour of the modification – due to the contribution of recovery services to reducing congestion.

10.3.13 Proposed Modification - New 'Carnet' licences

7 Stakeholders 2 Other Organisations 1 Individual Member of the Public

- balance in favour of the modification – increased flexibility welcomed.

10.3.14 Proposed Modification - Removal of discount for Royal Mail vehicles

5 Stakeholders 5 Other Organisations 6 Individual Members of the Public

- balance against the modification - concerns about Royal Mail's universal service obligation and recent job losses.

10.3.15 Proposed Modification - Removal of limit for Borough operational vehicles' discount

9 Stakeholders

- opinion divided on the modification;
- some support because the limit was considered arbitrary; and
- some opposition due to the related issue of Borough operational vehicles functioning in competition with private sector; or because the incentive to reduce vehicle use is lost.

10.3.16 Proposed Modification - Widened geographical eligibility for discounts and exemptions (excepting the Blue Badge holders' discount – see paragraph below)

4 Stakeholders 3 Other Organisations 1 Individual Member of the Public

- balance in favour of the modification – met previous objections; and
- some concern about the justification for blanket extension of discounts and exemptions.

10.3.17 Revised timetable for scheme commencement

6 Stakeholders 4 Individual Members of the Public

- balance in favour of the modification – will allow more time to resolve any difficulties; and
- several additional respondents still felt the scheme was premature

10.3.18 Proposed Modification - Extension of residents' 90% discount zone to cover three small areas adjacent to the charging zone boundary

2 Stakeholders 1 Other Organisation 4 Individual Members of the Public

- balance in support of the modification – seen as a sensible response to an anomaly.

10.3.19 Proposed Modification - Limit of 2 vehicles to be registered per day for the Blue Badge holders' discount

4 Stakeholders 1 Other Organisation

- balance in opposition to the modification; and
- concern about those disabled people who rely on lifts from others and make use of several cars per day.

10.3.20 Proposed Modification - Limit of 1 vehicle to be registered at any one time for residents' discount

4 Stakeholders 1 Other Organisation

- opinion divided on the modification;
- some support on the basis that the modification could limit fraud; and
- some opposition to restricting residents' choice.

10.3.21 Other Modifications

Only limited numbers of responses, all expressing support.

10.4 Other issues raised in the representations and objections received

10.4.1 A summary of the representations received on the unmodified aspects of the scheme is presented below.

10.4.2 The need to improve public transport before the scheme is introduced

22 Stakeholders 23 Other Organisations 131 Individual Members of the Public

- need to improve public transport before the scheme is introduced was stressed; and
- public transport currently considered not to be viable for certain journeys or too unpleasant, unreliable or insecure.

10.4.3 The consultation process/ public inquiry

24 Stakeholders 18 Other Organisations 50 Individual Members of the Public

- main complaint was that objections or concerns had not, or would not, be met;
- some considered the consultation was inadequate and that more groups should have been consulted.

10.4.4 The principle of congestion charging

11 Stakeholders 13 Other Organisations 90 Individual Members of the Public

- perceived lack of fairness was the key issue, particularly for the less well-off;
- some considered that the proposed congestion charging scheme would infringe upon civil liberties;
- others considered Londoners already pay heavily for living/parking in London; and
- described by some as 'just another tax'.

10.4.5 Suggested alternatives to the congestion charging scheme

2 Stakeholders 5 Other Organisations 51 Individual Members of the Public

- comments varied, including improving public transport instead, restricting access of vehicles to central London, and removing other restrictions to traffic flow.

10.4.6 Issues relating to the charging zone boundary

10 Stakeholders 18 Other Organisations 73 Individual Members of the Public

- increased traffic at the charging zone boundary was the major concern;
- also concern that communities spanning the boundary would be divided;
- in addition, a number of adjustments to the charging zone boundary were requested, notably in Kennington, but also on the Edgware Road; and
- concerns were expressed about the use of Tower Bridge as part of the diversionary route.

10.4.7 Traffic management

14 Stakeholders 6 Other Organisations 7 Individual Members of the Public

- concerns about displaced traffic and the need for appropriate traffic management measures; and
- the need for the London lorry ban to be reviewed and for road space to be re-allocated were key issues.

10.4.8 Effects on the environment

7 Stakeholders 7 Other Organisations 39 Individual Members of the Public

- a negative environmental impact at the charging zone boundary was anticipated.

10.4.9 The impact of the scheme on traffic levels

4 Stakeholders 6 Other Organisations 54 Individual Members of the Public

- concerns that the scheme would not have the desired effect on traffic levels.

10.4.10 Effects on the quality of life and cost of living

3 Stakeholders 13 Other Organisations 43 Individual Members of the Public

- main concern was the possible adverse effect of the congestion charging scheme on the quality of life for Londoners, in terms of a restriction on their movement and/or increased cost of living.

10.4.11 Potential adverse impacts on businesses

33 Stakeholders 25 Other Organisations 39 Individual Members of the Public

- fears about increased costs and loss of business as a result of the scheme; and
- other fears included possible recruitment difficulties, the disproportionate effect of the scheme on small businesses and the possibility of businesses being forced to relocate out of the charging zone.

10.4.12 100% discount for Blue Badge holders

12 Stakeholders 4 Other Organisations 6 Individual Members of the Public

- calls for wider eligibility criteria for disabled people to receive a discount;
- calls for the £10 annual registration charge to be waived; and
- concern about possible abuse of the discount.

10.4.13 Days and hours of operation

6 Stakeholders 7 Other Organisations 24 Individual Members of the Public

- Opinion divided on whether charging hours should be extended or reduced further.

10.4.14 Distribution of net revenues

12 Stakeholders 4 Other Organisations 14 Individual Members of the Public

- main comment was a call for the net revenues to be spent on public transport; and
- the need to extend the 10-year hypothecation period was also raised.

10.4.15 Enforcement

10 Stakeholders 4 Other Organisations 7 Individual Members of the Public

- concerns about potential abuse of discounts and exemptions was the main issue.

10.4.16 Suggested new discount for carers and charity workers

12 Stakeholders 6 Other Organisations 2 Individual Members of the Public

- main justification for this new discount related to concerns about the impact of the charging scheme on the provision of care, particularly by non-profit making organisations.

10.4.17 Suggested new discount for shift workers

11 Stakeholders 2 Other Organisations 23 Individual Members of the Public

- main justification for this new discount related to concerns about personal safety on public transport at night.

10.4.18 Suggested new discount for residents living near the charging zone boundary

7 Stakeholders 3 Other Organisations 23 Individual Members of the Public

- main justification for this new discount related to concerns that communities near the boundary may suffer negative impacts as a result of the congestion charging scheme.

10.4.19 Suggested new discount for commercial vehicles

10 Stakeholders 9 Other Organisations 2 Individual Members of the Public

- main justification for this new discount related to commercial vehicles lacking a public transport alternative, and possible adverse effects on business due to the charge.

10.4.20 Suggested new discount for hospital patients and their visitors

7 Stakeholders 1 Other Organisation 3 Individual Members of the Public

- main justification for this new discount related to concerns about adverse impacts on health care as a result of the charge.

10.4.21 Suggested new discount for 'key workers'

7 Stakeholders 3 Other Organisations 9 Individual Members of the Public

- calls for discounts for all 'key workers', particularly emergency service workers.

Chapter 11: Consideration of the representations and objections received to the December 2001 consultation

11.1 Introduction

- 11.1.1 This chapter provides an overview of TfL's consideration of the representations and objections received following the public consultation on the proposed Scheme Order which commenced in December 2001. This second round of public consultation sought representations on the proposed modifications to the Scheme Order, which followed the first round of consultation beginning in July 2001 and considered in chapter 5. As with chapter 5, this chapter indicates those instances where further changes to the Scheme Order are proposed in light of representations received during the second round of consultation.
- 11.1.2 TfL has considered all the representations and objections received as a result of the consultation exercise which took place from 10 December 2001 to 18 January 2002, including late responses. Annex G contains TfL's detailed consideration of representations and objections received from all stakeholders and other organisations as well as those which have been raised by 5 or more individual members of the public, and sets out TfL's response.
- 11.1.3 Those representations and objections raised by 4 or less individual members of the public are listed separately in Appendix B to Annex F. TfL has considered the representations and objections set out in this Appendix. However TfL has not provided a specific response to these representations in this report, and none are referred to in this chapter. TfL considers that these representations are either effectively addressed by responses in Annex G or contain no material which merits a separate response in this report.
- 11.1.4 In Annex G representations and objections have been categorised into 'themes' and 'sub-themes' according to the issue being considered. The themes and sub-themes were as for the initial consultation, with additions to identify views on the proposed modifications. As with the initial round of consultation, a representation from a respondent that commented on more than one issue is split accordingly, and dealt with under the appropriate themes or sub-themes. The themes are listed at the start of Annex G.
- 11.1.5 While this consultation was primarily directed at the proposed modifications to the Scheme Order, many of the representations concentrated on unmodified aspects of the proposed scheme. Consequently this chapter has been structured in a manner comparable to chapter 5. Consideration of representations to the proposed modifications to the Scheme Order are dealt with under the relevant 'themes'.
- 11.1.6 In this chapter, and in the associated annex, those representations that simply expressed support for the scheme proposals are not dealt with. The focus is on those representations that whilst, generally supportive, expressed one or more concerns about the proposals; and representations that objected to part or all of the proposals.

11.2 Representations and objections

Theme 1: The principle of Congestion Charging

- 11.2.1 Representations and objections falling within this theme concerned the general principle of introducing congestion charging to central London. Second round representations and objections focused largely on the proposed scheme being a tax or an unfair charge on drivers, and the view that congestion charging would infringe upon civil liberties. There were also representations that the proposed scheme would not reduce congestion and that it is a waste of public money. Some respondents considered that the proposed scheme conflicted with elements of other Mayoral strategies.
- 11.2.2 TfL's consideration of these representations reflects its assessment that the conditions which lead to the identification and development of the congestion charging scheme remain largely unchanged since the first period of consultation. TfL's response to the representations therefore remains informed by the same considerations outlined under the response to this theme in chapter 5; that congestion is a serious problem for London; and that the proposed congestion charging scheme remains the best practical way to tackle congestion. TfL made reference to relevant legislation concerning civil rights, and considers that the scheme would not be in conflict with considerations of civil liberty or equity.
- 11.2.3 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 2: Suggested Alternatives

- 11.2.4 Representations included within this theme suggested alternatives to the proposed congestion charging scheme. The ideas put forward broadly repeated the suggestions received during the first round of consultation and advocated the following as alternatives to the scheme as proposed: changes to parking provision or prices in central London; increased road capacity; public transport improvements; removal of restrictions to traffic flow (such as bus or cycle lanes); improvements to taxi services; restrictions on vehicles entering central London; better traffic enforcement, and pilot schemes.
- 11.2.5 TfL does not consider that any of the suggested alternatives, (either individually or as a group), would be as effective as congestion charging.
- 11.2.6 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 3: Boundary

- 11.2.7 Representations and objections included under this theme refer to the use of the Inner Ring Road as the boundary of the charging zone, and tended to make similar points to those received during the first consultation. Some suggested various extensions to the charging zone, while other representations argued that the charging zone should be smaller or at least exclude the area to the south of the Thames. In addition, representations also included local requests to alter the boundary route to include or

exclude certain roads adjacent to the Inner Ring Road. Particular concerns related to Kennington Lane and Tower Bridge, suggesting that these areas should be excluded from the diversionary route (Inner Ring Road). In the case of Kennington Lane, an alternative route including Harleyford Road and Kennington Park Road was preferred (though representations were also received objecting to this alternative route).

- 11.2.8 Following the first round of consultation, TfL proposed a modification to the boundary:
- That the charging zone boundary be adjusted at Mount Street, off Park Lane.
- 11.2.9 This modification received very little attention from respondents to the consultation and no objections to this proposed modification were received.
- 11.2.10 Following consideration of these representations, TfL's position remains that set out in chapter 5; that, aside from the proposed adjustment at Mount Street, the proposed charging zone should not be reduced or extended beyond the Inner Ring Road at this stage, as this would be beyond the scope of the scheme proposed in the Mayor's Transport Strategy and would be more difficult to implement. In particular, public transport provision outside the proposed charging zone is currently not as well developed and thus provides less scope to accommodate those who would wish to transfer to public transport.
- 11.2.11 Regarding the particular concerns around Tower Bridge, TfL's position remains that the bridge is suitable part of the Inner Ring Road boundary route. The introduction of speed and weight enforcement measures should serve to limit the number of heavy goods vehicles that use the bridge, while traffic signal controlled junctions to the north and south limit the general flow of traffic.
- 11.2.12 In response to the concerns regarding the Kennington Lane boundary, TfL has undertaken additional traffic modelling work to ascertain the impacts of re-routing the proposed boundary along Kennington Park Road and Harleyford Street. TfL has considered all the responses from stakeholders, other organisations and members of the public, and the results from additional traffic modelling work. TfL considers that the alternative boundary route would not be desirable, as the junction of Kennington Park Road and Harleyford Road could not accommodate the necessary volume of Inner Ring Road traffic without causing significant delay to key bus routes and severely curtailing pedestrian facilities proposed for Oval Underground station.
- 11.2.13 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to the charging zone boundary at Mount Street. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 4: Days & Hours of Operation

- 11.2.14 The majority of the representations included under this theme concerned TfL's proposed modification to the charging hours:
- That charging hours be 7.00am to 6.30pm instead of 7.00am to 7.00pm.
- 11.2.15 Some representations argued against this change on the grounds that it would undermine the effectiveness of the scheme, while others suggested the hours should be extended to

end later in the evening or to cover, for example, weekends. A number of representations argued a contrary position, suggesting that charging should end even earlier; others raised concerns that the charging hours would not be consistent with those applying to some controlled parking zones.

11.2.16 TfL's position remains consistent with that outlined in chapter 5 under this theme; that the proposed shortening of the charging hours would bring significant advantages to certain sectors of the central London economy, notably the theatre and entertainment industry, without significantly impacting on the effectiveness of the scheme. TfL considers that further extensions to the charging hours would yield limited additional benefits while reducing the public acceptability of the proposed scheme by charging at times when public transport is less well provided and less attractive an alternative to car travel.

11.2.17 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to the charging hours. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 5: Level of charge

11.2.18 Representations and objections received during the second period of consultation reflected those made in the first round, with concern raised regarding the level of the charge: either that it was too high or too low. Suggestions were also received regarding reductions for period payments or incremental charges; and concerns were raised about possible future increases in the level of the charge.

11.2.19 TfL's consideration of these representations reiterated its response to similar representations received during the first round of consultation: that TfL has taken into account earlier consultations and studies on the level of the proposed congestion charge and that a £5 daily charge would be both effective and widely regarded as fair. Reference was again made to the monitoring programme, and TfL reaffirmed that adjustments to the scheme, including the level of the charge, would be considered if they were judged necessary.

11.2.20 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 6: Scheme Operations

11.2.21 Many of the representations and objections falling within this theme broadly reflected those received during the first round of consultation. They included concerns relating to the operation of the proposed scheme; the enforcement and appeals procedures; the levels of penalty charges; the clamping/removal processes; registration processes; refunds; hirer liability; the minimum licence period for the residents' discount; and data protection issues. Concerns were also raised regarding the enforcement of some discount and exemption categories including Blue Badge holders, public service vehicles, borough operational vehicles, and the new proposed discounts for minicabs, the NHS and firefighters.

11.2.22 In many cases the representations raised issues for which TfL had already made provision (such as the importance of having a just and transparent appeals process). TfL's response outlined the relevant operational details, and provided examples of how the congestion charging scheme would operate in practice in order to address specific concerns (such as whether drivers forced to divert into the charging zone by police diversions would be eligible to contest the charge).

11.2.23 TfL proposed a range of modifications to operational features of the congestion charging scheme following the first round of consultation. These proposed modifications were as follows:

- The charge may be 'pre-paid' 65 charging days in advance of the relevant charging day, rather than 56 calendar days.
- A requirement to be introduced that complete applications for discount status must be received at least 10 charging days before the first charging day.
- A requirement that complete applications for discount status starting within 3 months of the start of the scheme must be received at least 20 charging days before the first charging day.
- The period for individual discount registrations initially to be between 12 and 15 months, to stagger the renewal of registrations.
- The requirement to be removed that proof of different address from that previously provided by licence purchaser is needed for a licence refund.
- The requirement to be introduced that postal applications requesting amendments must be received 7 charging days in advance and telephone applications 3 charging days in advance.
- The provision for an amendment to a licence to allow an earlier charging date to be added.
- The provision to be introduced to ensure that, if TfL does not receive proper payment, the licence being purchased is void or the entry in the discount register is removed.
- Vehicles to be removed from the discount register 7 charging days after a change of keeper unless renewed.
- Vehicles to be removed from the discount register and notification to be given by TfL if eligibility ceases.
- 90% residents' discount licences purchased improperly (e.g. using a stolen credit card) to be void.
- The charge may be paid after the vehicle has been in the charging zone at the standard daily rate of £5 until 8.00pm, rather than 7.00pm.

11.2.24 The majority of these proposed modifications attracted very little attention, and no objections, from respondents to the consultation. However a substantial number of representations were received concerning the proposed modification to postpayment arrangements (that the standard £5 rate would apply until 8.00pm). Respondents suggested that the charge should remain at £5 until midnight on the day of travel, at least for commercial vehicles. TfL has recognised that there is merit in delaying further the introduction of this surcharge until after 10.00pm to allow the spreading of payments at the end of charging hours, and TfL proposes that a further modification be made in order to accommodate this change.

11.2.25 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the scheme operational features outlined above, including the further proposed modification to the postpayment arrangements.

Theme 7: Use of Net Revenues

11.2.26 Representations and objections within this theme relate to Annex 2 of the Scheme Order. In accordance with the legislation, Annex 2 sets out the proposed transport schemes and measures on which it is proposed the net revenues from the proposed scheme would be spent.

11.2.27 Respondents tended to identify specific areas of public transport improvements that should be given priority, such as improved accessibility, walking and cycling facilities, and capital projects.

11.2.28 Representations to this theme also focused on the revised net revenue estimate, which was as follows:

- The estimate for the scheme's net revenues quoted in the Scheme Order to be revised to £130m per year.

11.2.29 Concern was expressed that the estimated reduction in net revenue would impact on projects identified in TfL's plan for expenditure of the net revenues. Other representations requested detailed analysis of net revenues and start-up costs.

11.2.30 TfL's response reiterated that the net revenues, by law, must be spent on transport proposals that conform to the Mayor's Transport Strategy. TfL has developed Annex 2 as a general spending plan for applying its share of the net proceeds that TfL has allocated across Greater London and not limited to the charging zone. TfL proposes that a statement be added to the Scheme Order, confirming that the Ten Year General Plan for the spending of the net proceeds from the proposed scheme has been submitted by TfL to the Secretary of State for approval.

11.2.31 The General Plan for the use of these revenues is still realisable within the estimates of revenue expected to be raised as a result of congestion charging. The provision of socially responsible discounts and exemptions, both in the original Scheme Order and in the new version have obviously impacted on the overall expected revenue but TfL believes this programme of exemptions and discounts is right to protect the most vulnerable in our society, and key services.

11.2.32 Several representations suggested that the hypothecation period for the spending of the net revenues be extended beyond 10 years. TfL understands the Mayor is lobbying the Government for an extension of the ten-year hypothecation period, and supports the Mayor in doing so.

11.2.33 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to the amount of the estimated net revenues in Annex 2 to the Scheme Order.

Theme 8: Payment Method

11.2.34 Representations included within this theme relate to concerns about the convenience, accessibility and administrative costs of licence purchases. Most representations concerned the proposed modifications to payment methods, which are as follows:

- 'Carnet Licences' to be introduced to allow charges to be paid through the issue of undated licences purchased in advance and subsequently validated for use on particular days;
- The arrangements for fleet operators to be amended:
 - to provide separate arrangements for goods vehicles and for cars and light vans;
 - to include leased and hired vehicles;
 - to require registration under each agreement of at least 25 vehicles;
 - to allow TfL to charge up to 115% of the standard daily charge for this facility; and
 - to include an initial charge of £10 per vehicle under such agreements.

11.2.35 Representations received on this theme suggested that commercial vehicles weighing less than 3500kg should be included in the proposals for fleet accounts. Also, some representations indicated that the £10 annual charge and 115% charge for vehicles participating in the decrementing fleet scheme were excessive. While the proposed modification to introduce carnet licences attracted little adverse comment, their value was queried by one respondent.

11.2.36 In response to the representations regarding licence purchase, TfL referred to the proposed modifications to reduce the administrative costs of complying with the proposed scheme and to provide increased flexibility for vehicle operators or drivers who wish to make occasional trips into or across the charging zone. TfL confirms that it would ensure that there would be a wide variety of payment channels, should the Mayor confirm the Scheme Order.

11.2.37 As a result of the representations regarding the fleets account system, TfL proposes modifications to fleet account proposals so that light vans are included in the 'decrementing' fleet account scheme and the 115% surcharge is reduced to 110%.

11.2.38 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to introduce carnet licences and arrangements for fleet operators, including the further proposed modifications to the arrangements to fleet operators.

Theme 9: Project timetable

11.2.39 Representations and objections falling within this theme concern the proposed timetable for the introduction of the proposed scheme, which TfL proposed to be modified as follows:

- The date in the Scheme Order for the start of charging is to be changed from 14 months to 12 months after confirmation of the Scheme Order; and the date for other parts of the Scheme Order coming into effect to be changed from 9 months to 8 months after confirmation.

- 11.2.40 There was very little negative comment regarding the proposed modifications to the timetable, although a few respondents preferred the proposed congestion charging scheme to commence as soon as possible. Representations instead focused on whether the timetable to introduce the proposed scheme is feasible, referring to the lead-times required for traffic management and complementary transport measures.
- 11.2.41 TfL remains satisfied of the feasibility of the broad timetable for the introduction of congestion charging, but acknowledges that the dates would be extended by up to 2 years should the Mayor decide to hold a Public Inquiry. This assessment is based on the latest advice from consultants and discussions with preferred service providers, that the design and all test stages would be achieved in the timeframe proposed. TfL also considers that improvements to public transport will be in place by mid-February 2003.
- 11.2.42 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to the scheme timetable. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 10: Consultation and public inquiry

- 11.2.43 Representations received in the second round of consultation commented on the consultation process including the first round of consultation on the made Scheme Order starting in July 2001. Some suggested that there had been inadequate public consultation, suggesting that its scope should have been wider. Others commented that there was inadequate information on specific issues, including operational and longer-term information. Representations were also received regarding the timescale of the consultation, and a consultation period over the holiday period.
- 11.2.44 A number of representations requested that the Mayor call a public inquiry/hearing. This issue is addressed in chapter 15. Some representations also expressed a view that previous objections had not been taken into account, and that a public inquiry would be an opportunity to resolve such issues, and would provide a forum for public debate of the proposed scheme.
- 11.2.45 TfL's response outlines what it considers to be a thorough and comprehensive consultation process, starting with the discussion document 'Hearing London's Views', the consultation on the draft Transport Strategy, and the two periods of consultation commencing in July and December 2001. TfL's consideration points to extensive publicity surrounding the Scheme Order consultation (including street notices, newspaper coverage, radio advertisements, leaflets and an advertised freephone information line); and the provision of detailed plans and information at a public exhibition, public meetings and on the internet. TfL undertook extensive consultation on the proposed modifications to the Scheme Order, with over 300 respondents making representations. All responses to the consultation (including those received after the closing date) have been considered.
- 11.2.46 TfL's response also details TfL's subsequent dialogue with those stakeholders who have asserted that they had been insufficiently involved, and attempts to account for specific

instances where stakeholders believe insufficient consideration was given to their input, such as the concern among certain London Boroughs over traffic modelling.

11.2.47 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 11: Discounts & Exemptions – General

11.2.48 Representations included under this theme raised points about the overall justification for discounts and exemptions. Respondents also commented on the proposed modifications to extend the geographical eligibility for certain discounts and exemptions. These proposed modifications were as follows:

- A provision to be introduced to define certain discount categories for vehicles registered in Northern Ireland.
- Extension to vehicles from Member States of the European Union or European Economic Area of discounts and exemptions for vehicle excise duty exempt ambulances, invalid carriages and vehicles used for the carriage of disabled people by a recognised body, buses with nine or more seats, and recovery and accredited breakdown vehicles. Extension of Blue Badge discount to holders of equivalent badges in European Union states. Extension of the fleet account facility to vehicles registered in European Economic Area states.

11.2.49 Some respondents felt that the discounts and exemptions, and particularly proposed modifications to extend certain of these provisions, may undermine the effectiveness of the proposed congestion charging scheme.

11.2.50 TfL's position regarding the overall justification for discounts and exemptions remains that outlined in chapter 5: that while the overriding objective of the proposed scheme is to reduce congestion, TfL recognises that some exemptions and discounts are warranted, particularly for those with mobility difficulties. In addition, some vehicles perform valuable public services or help contribute towards the delivery of other Mayoral objectives. TfL believes that the proposed modifications to the exemptions and discounts are socially responsible whilst maintaining the integrity of the scheme.

11.2.51 TfL's response regarding the extension of geographical eligibility for certain discounts and exemptions referred to advice on European law.

11.2.52 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 12: Discounts & Exemptions – Motorcycles and Mopeds

11.2.53 Representations received under this theme suggested that motorbikes and mopeds should not be exempt from charging, on the grounds of safety and environmental concerns.

11.2.54 TfL's position remains that outlined in chapter 5: that the proposed exemption for motorcycles is justified on the basis that they contribute less to congestion than other

vehicles; and also makes the practical point that motorcycles are more difficult to enforce with camera technology compared with other vehicles. Should the proposed scheme be introduced, the level of accidents involving motorcycles would be monitored carefully, and their exempt status reviewed if necessary.

11.2.55 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 13: Discounts & Exemptions – Certain Military Vehicles

11.2.56 No representations were received referring to the proposed modification under this theme, which was as follows:

- That military vehicles would be pre-registered with TfL to be eligible for a 100% discount, rather than being exempt.

11.2.57 However, a representation was received requesting that the proposed 100% discount for operational vehicles be extended to all operational military vehicles.

11.2.58 Following consideration of this representation and discussions with MOD representatives, TfL considers that the 100% discount for military vehicles in the Order as modified, should be adjusted to cover camouflaged and non-camouflaged vehicles that are being used for 'operational' purposes.

11.2.59 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to the discount for certain military vehicles, including the further proposed modification to the eligibility criteria for the discount.

Theme 14: Discounts & Exemptions – Alternative Fuel Vehicles

11.2.60 Representations included under this theme refer to the proposed discount for alternative fuel vehicles, and the eligibility criteria for the discount. Following the first round of consultation, TfL proposed modifications to the eligibility criteria for the alternative fuel vehicle discount, which were as follows:

- The 100% discount for mono-fuelled gas vehicles to be extended to all alternative fuel vehicles, registered or eligible to be registered, to specific groups in the TransportAction PowerShift database i.e. meeting the required emission standards (based on the Euro III and Euro IV standards).
- The requirement for certain alternative fuel vehicles to be registered and operated from a Greater London address to be removed.

11.2.61 Some representations raised concerns about there being any discount at all for alternative fuel vehicles - arguing that this discount was not consistent with the goal of reducing congestion - and questioned the proposed modification to extend the eligibility criteria for the discount. However a substantial number of representations argued that the eligibility criteria should be widened still further with many proposing 'clean' diesel vehicles for inclusion. Some concern about how eligibility for the discount would be verified was expressed.

- 11.2.62 TfL remains of the view (outlined in chapter 5) that although the primary goal of the proposed scheme is congestion reduction, a discount to encourage the use of greener fuels by adopting very high standards of emissions would advance other Mayoral priorities relating to air quality. Having met with industry experts, TfL considers that it is neither operationally feasible nor desirable in policy terms to extend the discount to diesel vehicles, as the emissions benefits they offer are significantly lower than for the alternative fuel vehicles currently proposed for discount.
- 11.2.63 Following consideration of a representation concerning the operation of the discount, and to ensure effective enforcement of the eligibility criteria, TfL is recommending that the Scheme Order be modified further so that the discount for alternative fuel vehicles applies only to those vehicles which are included on the PowerShift register.
- 11.2.64 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the discount for alternative fuel vehicles, including the further proposed modification that eligible vehicles must be registered with PowerShift.

Theme 15: Discounts & Exemptions – Borough Operational Vehicles

- 11.2.65 Representations included under this theme repeat many of the concerns raised during the first round of consultation. Some respondents also commented on the proposed modifications to the discount for borough operational vehicles, which were as follows:
- The provision that there be an upper limit on the number of certain borough operational vehicles eligible for a 100% discount to be removed.
 - Royal Parks Agency operational vehicles to be treated in a manner comparable to qualifying borough operational vehicles, i.e. registered vehicles will receive a 100% discount.
- 11.2.66 A number of representations argued that there should be parity between the public and private sector so that equivalent vehicles operating within each sector were either all exempt, or all subject to charge. There was some concern that the removal of the upper limit on the number of eligible borough operational vehicles may exacerbate this problem. Concern was also expressed that the proposed removal of the upper limit on vehicle numbers could encourage operating departments to inflate the numbers of vehicles eligible for the discount.
- 11.2.67 No objections were received with regard to the new discount for Royal Parks Agency operational vehicles.
- 11.2.68 TfL's position regarding the principle of the discount for borough operational vehicles remains consistent with that outlined in chapter 5; namely that although the functions they perform may in some cases be similar to those undertaken by commercial vehicle users, the distinction remains that local authorities provide public services. With regard to the removal of the upper limit on numbers of discounted vehicles, TfL considered that the restriction was inappropriate given the existence of other safeguards. TfL is working closely with the boroughs concerned and will establish a code of practice relating to which vehicles are eligible for the discount. Vigorous and robust checks would be applied to these and other vehicles afforded a discount or exemption for the proposed congestion charging scheme.

11.2.69 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the discount for certain borough operational vehicles. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 16: Discounts & Exemptions – Breakdown & Recovery Vehicles

11.2.70 Representations included under this theme refer to the proposed discount for breakdown and recovery vehicles, and the eligibility criteria for this category. Following the first round of consultation, TfL proposed modifications to the eligibility criteria for this discount, which were as follows:

- The 100% discount for specially adapted recovery vehicles to be extended to vehicles constructed, adapted or equipped to provide roadside assistance or recovery services and operated by an accredited recovery organisation.
- The requirement for certain recovery vehicles to be registered and operated from a Greater London address to be removed.

11.2.71 Some representations questioned the rationale for the proposed modification to extend the geographical eligibility for the discount for breakdown and recovery vehicles; some emphasised the need to ensure that only accredited recovery firms received the discount; while others sought assurance that independent recovery operators on police business would be eligible for the discount.

11.2.72 TfL's response reiterated the consideration included in the response to the first round of consultation; that the extension of the discount to include a wider range of breakdown and recovery vehicles was desirable in recognition of the vital role they have in clearing the streets of congestion by removing broken down vehicles. TfL's response also confirmed that breakdown and recovery vehicles eligible for discount would need to be accredited by a certified body operating to the relevant British Standard (or equivalent); and that this would include independent operators working for the police, provided they met this criteria.

11.2.73 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the discount for certain breakdown and recovery vehicles. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 17: Discounts & Exemptions – Firefighters

11.2.74 Representations received under this theme refer to the following proposed modification:

- The introduction of a provision for a 100% discount for those firefighters needing to use their cars for operational travel between London fire stations.

11.2.75 Some representations questioned the justification for the discount, arguing, for example, that it would be difficult to make a distinction between legitimate vehicle use and firefighters using their vehicle to travel to work. Others sought further widening of the

discount, with suggestions that the discount be applied to firefighters and other emergency service workers who need to drive to work.

11.2.76 TfL's response reiterated that the objective of congestion charging is to reduce congestion in central London and as such there are no plans to provide any individual with an exemption for travelling to work by private car. The proposed discount reflects operational need, and vigorous and robust checks would be applied to all vehicles afforded a discount or exemption from the scheme.

11.2.77 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to introduce a discount for operational travel by firefighters. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 18: Discounts & Exemptions – Disabled

11.2.78 Following the first round of consultation, TfL proposed modifications to the Blue Badge holders' discount, as follows:

- The requirement for vehicles used by disabled Blue Badge holders to be registered and operated from a Greater London address to be removed.
- Clarification that Blue Badge holders 100% discount be limited to two vehicles per day.
- Blue Badge holders whose badge expires during the discount registration period to be offered the option to pay £10 when submitting proof of a new badge and to extend their discount registration period for one year.
- Institutions in receipt of a Blue Badge to be treated in a comparable manner to individual Blue Badge holders.

11.2.79 There was some concern about potential abuse of the Blue Badge holders' discount by non-eligible drivers using vehicles covered by a discount, or procuring a Blue Badge. It was considered that this might be exacerbated by the geographical extension of the discount. Respondents also commented on the limit to registering two vehicles per day for the discount, with some expressing concerns that the allowance for two vehicles could further exacerbate abuse of the discount. Conversely, other respondents commenting on this proposed modification were concerned that the restriction may be problematic for those who rely on lifts from others.

11.2.80 The modifications concerning institutional Blue Badge holders and the option to extend the discount registration period attracted little comment, and no objections.

11.2.81 Other representations received under this theme included suggestions that the eligibility criteria for the discount should be widened, for example, to people registered as partially sighted, profoundly deaf people, people with learning disabilities, or to disabled people who are unable to use public transport but who are not eligible for a Blue Badge. Some respondents expressed opposition to the £10 annual charge on the grounds that they considered that it was discriminatory. There was concern that the proposed discount based on the Blue Badge was inconsistent with the concessions available to disabled drivers in the 'Green Badge' area. Another respondent considered TfL should await the

review of the Blue Badge scheme before considering it as a basis for a discount from congestion charging.

11.2.82 TfL has looked carefully at the feasibility of extending the eligibility for the 100% discount beyond the Blue Badge, considering a range of possible alternative criteria, and has concluded that such an extension would have serious implications for the scheme's operational effectiveness. TfL also considers that the operational effectiveness of the scheme would be undermined if there were no restrictions on the number of nominated vehicles eligible for the 100% discount. Finally, TfL's response noted that the Green Badge parking concession would not be affected by the proposals for congestion charging.

11.2.83 TfL's response to concerns about abuse referred to the fact that the Blue Badge scheme is recognised across the European Union, and that whilst TfL recognised the concerns expressed by some respondents that the Blue Badge scheme is open to misuse and fraud, there is a lack of substantive evidence to support these claims and it is not considered acceptable to adopt a more restrictive set of criteria. TfL considers that the 100% discount for vehicles used by disabled persons in receipt of a Blue Badge achieves a reasonable balance between the need to ensure operational effectiveness of the scheme and congestion relief, whilst maintaining equity and social inclusion. Nevertheless, TfL has stated previously that the 100% discount for vehicles used by disabled persons in receipt of a Blue Badge is likely to be seen as an 'interim' solution, pending the outcome of the formal review of the Blue Badge scheme by the DTLR.

11.2.84 A number of administrative checks will need to be carried out by TfL when a disabled person registers for the 100% discount so as to minimise the scope for potential abuse, misuse or fraud. The discount takes account of the need to cover the cost of these checks.

11.2.85 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the discount for Blue Badge holders. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme. TfL will monitor the impact of this discount and will take account of the Government's review of the Blue Badge system.

Theme 19: Discounts & Exemptions – Emergency Vehicles

11.2.86 TfL's proposed modifications, following the first round of consultation, to the discounts and exemptions for emergency service vehicles were as follows:

- The requirement for certain vehicles used for fire, police and ambulance purposes to be registered and operated from a Greater London address to be removed.
- HM Coastguard and lifeboat haulage vehicles and Port of London Authority operational vehicles to be eligible for a 100% discount. Certain lifeboat vehicles exempt from VED to be exempt from charging.

11.2.87 A representation was received from the Port of London Authority concerning the proposed extension of the emergency vehicles discount to cover certain Port of London Authority vehicles. The representation queried what constituted an 'emergency' and argued that no

'front line' vehicle should be charged. No further representations were received on this theme.

11.2.88 TfL's response explained that the extension of the discount to cover the Port of London Authority vehicles was on the basis that they carry out emergency response and search and rescue co-ordination on the River Thames.

11.2.89 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the discounts and exemptions for emergency service vehicles. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 20: Discounts & Exemptions – NHS

11.2.90 Representations received under this theme refer to the following proposed modification:

- The introduction of a provision for a 100% discount for NHS staff who have to use their cars to carry controlled drugs, confidential patient records, bulky, heavy or fragile equipment or other specified material.

11.2.91 Representations within this theme included appeals for an extension of the proposed discount to cover more staff and journeys, particularly the journey to work. Representations also commented that the proposed discount did not include locum staff or those working 'on-call'. There was concern that the proposed reimbursement scheme to operate the discount may prove to be an administrative burden to the NHS. Other representations argued that private firms carrying out similar activities to NHS staff should also be exempt from the charge. However, there were concerns expressed about potential abuse of the proposed discount through broad interpretation of the eligibility criteria.

11.2.92 TfL has recognised certain circumstances where the use of private vehicles is necessary for operational reasons and believe that these discounts are socially responsible whilst maintaining the integrity of the scheme. TfL considers that the discount should be operated as a reimbursement arrangement in order to ensure that it is not used for journeys to work. In order to prevent abuse of the discount, TfL is working closely with the NHS London Regional Office to establish a code of practice for operating the proposed discount. Vigorous and robust checks would be applied to these and other vehicles afforded a discount or exemption under the congestion charging scheme.

11.2.93 There are no plans to provide any profession or individual with an exemption for travelling to work by private car without further justification of operational need within the public services. The NHS reimbursement scheme will not apply to private health care practices.

11.2.94 TfL is proposing a further modification to the Scheme Order to extend the eligibility criteria to locums and agency staff covering positions which would otherwise be eligible.

11.2.95 However, TfL considers that any further extension of a discount to accommodate individual health service employees who might need to use a car would be difficult to administer and could give rise to anomalies elsewhere. However, TfL recognises that there are strong arguments in favour of other categories of NHS employee receiving a

discount, although the precise extent of such a discount is a difficult judgement in policy and operational terms.

11.2.96 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to introduce a discount for certain NHS staff, and further proposed modifications to extend the discount to locums and agency staff.

Theme 21: Discounts & Exemptions – Private Hire Vehicles

11.2.97 Representations received under this theme refer to the following proposed modification:

- Private hire vehicles (minicabs) to be eligible for exemption, once fully licensed under the London licensing system and the vehicle has been hired.

11.2.98 Representations under this theme included concerns that the discount for private hire vehicles does not provide an incentive either to use or improve public transport; concern that the Public Carriage Office may not have introduced all three Private Hire Vehicles licences by the time the congestion charging scheme starts; that the new exemption could potentially be abused; and that all licensed private hire cars should be exempt from the charge.

11.2.99 The 100% discount for fully licensed private hire vehicles (minicabs) will support the priority in the Mayor's Transport Strategy towards incorporating licensed private hire vehicles into London's transport system. The discount will only be valid once an operator, vehicle and driver are licensed under a London licensing system, and when the vehicle has been hired. This is to ensure the operational effectiveness of the scheme. Rigorous checks will be applied to these and other vehicles afforded a discount or exemption for the Scheme. TfL does not consider it appropriate to extend the 100% discount to minicabs outside Greater London.

11.2.100 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to introduce a discount for private hire vehicles. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 22: Discounts & Exemptions – Public Service Vehicles

11.2.101 TfL's proposed modifications to the exemption for public service vehicles, following the first round of consultation, were as follows:

- The exemption for public service vehicles with 17 or more seats to be extended to buses with 9 or more seats.
- Vehicles operated under section 19 of the Transport Act 1985 and community buses to be eligible for a 100% discount; with comparable arrangements for vehicles from Northern Ireland.

11.2.102 Representations received on this theme included a concern that the modification as drafted might not in fact exempt coaches as intended. Conversely, there was some concern that tourist coaches should not receive a discount, and that greater emphasis

should be placed on the use to which vehicles are put, rather than providing a blanket discount for non-profit and charity buses. The justification for buses to be exempt from the charge was also queried, based on the argument that they are a cause of congestion.

11.2.103 TfL does not consider it appropriate that public transport should be charged as part of the congestion charging scheme. By basing the eligibility criteria for the 100% discount for non-profit and charity buses on Section 19 and 22 permits, the use to which the vehicle is put is already restricted. All persons receiving discounts and exemptions through the scheme are bound by the terms and conditions under which they are issued. Rigorous and robust checks will be applied to all vehicles afforded a discount or exemption for the scheme.

11.2.104 In order to ensure that all buses and coaches with 9 or more seats are exempt or subject to a 100% discount, TfL is recommending a further modification to the Scheme Order. to allow a discount to large passenger vehicles, defined as those with nine or more seats.

11.2.105 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the exemption or discount for public service vehicles, amended by the further proposed modification.

Theme 23: Discounts & Exemptions – Royal Mail Vehicles

11.2.106 Representations received under this theme refer to TfL's proposed modification, as follows:

- The removal of 100% discount for Royal Mail liveried vehicles.

11.2.107 Representations were received querying the justification for the removal of this discount, arguing that as the Royal Mail is subject to a Universal Service Obligation, it should receive special consideration.

11.2.108 TfL's consideration was informed by the recommendation made by the postal regulator – the Postal Service Commission (Postcomm) – that the discount for Royal Mail vehicles be removed in order to avoid distortion of competition.

11.2.109 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modification to remove the discount for Royal Mail vehicles. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 24: Discounts & Exemptions – Residents' Vehicles

11.2.110 TfL's proposed modifications to the residents' 90% discount were as follows:

- The eligibility for residents' discount is to be restricted to residents aged 17 years or over.
- Residents of the proposed residents' discount zone to be restricted to registering one vehicle at any one time for the 90% discount.

- In three small areas adjacent to the charging zone boundary, residents are to be eligible for the residents' 90% discount.
- Requirement for residents to notify TfL of a change of address within the residents' discount zone and to confirm continued eligibility.
- Provision that a discounted licence becomes void if applicant ineligible.

11.2.111 The proposed modifications to the discount for vehicles residents attracted very little attention, and few objections, from respondents to the consultation. Representations included concern that the limit of one vehicle would be unduly restrictive; and identification of access problems at other areas adjacent to the proposed charging zone boundary.

11.2.112 Other representations concerning the residents' discount included calls for residents to receive a 100% rather than 90% discount; extension of the eligibility criteria (e.g. to people only resident on occasion); objections to the annual charge required to receive the residents' discount, and suggestions that the residents' discount be extended to include businesses located within the charging zone. However, some respondents considered that residents should not receive a discount from the congestion charge.

11.2.113 TfL's consideration reiterated that the reduction of traffic congestion is the overriding objective of the proposed scheme, and that the imperative to discourage unnecessary car journeys applied to residents within the zone as well as those travelling into central London from elsewhere. TfL considers the discount appropriate, as most residents with cars living in the charging zone are not in a position to avoid the charge. Many already pay for a residents' parking permit from their local authority.

11.2.114 TfL considers it appropriate to restrict the 90% discount to one vehicle per household to be in keeping with the overriding objective of the scheme – to tackle traffic congestion – by discouraging unnecessary use of private vehicles.

11.2.115 TfL does not consider the £10 annual charge excessive as the discount allows the recipient to travel in the charging zone for a year at a substantially discounted rate. Residents will need to make a decision as to whether or not to register for the discount. In some instances, where residents use their cars very infrequently, it may not be cost-effective to register for the residents' discount.

11.2.116 Businesses are often not afforded concessions in Borough residents' parking schemes and TfL considers it inappropriate to extend the 90% discount for residents of the charging zone to businesses.

11.2.117 The version of the Scheme Order which TfL now recommends to the Mayor for confirmation incorporates the proposed modifications to the residents' 90% discount. TfL recommends that no further changes to the scheme proposals, or further modifications to the Scheme Order, are appropriate following consideration of the representations and objections under this theme.

Theme 25: Discounts & Exemptions – New Proposals

- 11.2.118 Representations received within this theme requested further widening of the discount and exemption categories to include various specific groups such as residents living outside but near to the boundary (the buffer zone); participants in car share schemes; carers and charity workers; commercial and business vehicles; vehicles used by the elderly and patients/visitors to central London hospitals; those working in the charging zone (especially key and shift workers); those on low incomes; vehicles used for religious purposes; and vehicles used on behalf of utility companies.
- 11.2.119 TfL has considered the buffer zone issue carefully. Wherever the boundary is sited there will be residents, businesses and other organisations that consider they should be either inside or outside the zone. TfL considers that it has proposed a series of socially responsible discounts and exemptions while adhering to the purpose of the scheme to reduce congestion in central London. However, if the Mayor confirms the Scheme Order, a programme to monitor the impacts of the scheme would be put in place, and TfL would take account of the results and make changes if necessary.
- 11.2.120 The residents' 90% discount is aimed at those Londoners who are permanent residents within the proposed charging zone and whose vehicles are registered at that address. Any extension of the residents' discount zone would significantly erode the decongestion benefits of the scheme. TfL does not consider it appropriate to extend the residents' 90% discount zone beyond that identified on the deposited plans.
- 11.2.121 After careful consideration of car share vehicles, TfL believes that a discount for such vehicles would be difficult to readily define or enforce and would erode the benefits of the congestion charging scheme.
- 11.2.122 TfL does not consider it appropriate that carers or charity workers should be offered a discount from the congestion charging scheme; nor does TfL consider it appropriate that vehicles used by the elderly or by all patients / visitors to central London hospitals should be offered a discount from the congestion charging scheme. However, TfL recognises that there are strong arguments in favour of a discount for certain categories of patient, although the precise extent of this discount is a difficult judgement in policy and operational terms. The proposed scheme includes proposals for exemptions and discounts which may benefit these specific groups; such as the 100% discount for minibuses operated by charities, an exemption for disabled passenger carrying vehicles, a recommended discount for private hire vehicles, and the 100% discount for Blue Badge holders.
- 11.2.123 TfL has considered all the representations with regard to the impact of the congestion charge on businesses across London. In response to concerns regarding administrative costs for business, TfL has developed a fleet account system in discussion with representative business organisations. TfL traffic modelling shows a reduction in congestion in central London which will improve journey times and reliability for vehicles inside and beyond the proposed charging zone, including those engaged in business

activity. If the Mayor confirms the Scheme Order, TfL has planned an extensive monitoring programme, and will pay particular attention to the impacts on business. Businesses would also be able to take advantage of the proposed modification of the discount for alternative fuel vehicles which, if adopted, would incorporate the lowest emission commercial vehicles. With regard to the representations concerning discounts for utility company vehicles, TfL considers that such vehicles are no different from other private commercial vehicles and hence do not warrant a discount or exemption.

11.2.124 TfL has considered representations seeking discount or exemption for those working in the charging zone, including representations arguing that shift or key workers need special treatment. TfL's response reiterated that the objective of congestion charging is to reduce congestion in central London and as such there are no plans to provide any profession or individual with an exemption for travelling to work by private car without further justification of operational need within core public services. The Mayor has a commitment to improving public transport prior to the introduction of the scheme to provide a realistic alternative to the private car. However, in discussion with public sector operators, TfL has recognised certain circumstances where use of a private vehicle is unavoidable for operational reasons and has proposed modifications to the Scheme Order to recognise these operational needs.

11.2.125 TfL has considered the representations for exemptions for people on a low income. Fewer than half of the poorest households in London have access to a car, and 86% of them say they never travel in the proposed charging zone in a car during 7am – 7pm (Source: MORI poll for TfL, March 2001). The Mayor has a commitment to improving public transport prior to the introduction of the scheme to provide a realistic alternative to the private car. TfL does not consider that the proposed congestion charging scheme will impact disproportionately on those with a low income; indeed, as these people are most likely to use public transport they should benefit from the investment being made in public transport both before and after the introduction of the proposed scheme.

11.2.126 TfL has considered the representations for exemptions for vehicles used for religious purposes. TfL has proposed a series of socially responsible discounts and exemptions to the scheme but does not believe it would be possible, operationally, to manage such a discount or that it would accord with the objectives of the scheme.

11.2.127 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 26: Traffic and Transport Modelling

11.2.128 Representations included in this theme expressed concern about the quality of the modelling outputs – specific queries were raised which were addressed separately by TfL. Details are available at Annex G.

11.2.129 TfL considers that its use of a variety of computer models, of differing emphasis and purpose allows it to develop high and low sensitivity estimates and appreciations of the consequences for car users switching to public transport or drivers avoiding the charging zone by diverting to other routes. TfL has addressed specific queries or challenges by providing further details of the assumptions underpinning the modelling work, and the

reasoning behind decisions informing the analysis. TfL continues to apply various modelling techniques in order to assist its assessment of the likely impacts of the proposed scheme, and to support the development of the associated complementary transport measures and traffic management strategy, in readiness for a decision by the Mayor on the Scheme Order.

- 11.2.130 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 27: Impacts Monitoring

- 11.2.131 Representations and objections under this theme include arguments that TfL should conduct monitoring and impact analysis before and during implementation of the proposed scheme; the need for performance targets; concerns over the use of monitoring data; the transparency of the proposed scheme; and suggestions that TfL would need to be responsive to monitoring results and make modifications to the scheme accordingly. In addition to this, concerns have been raised over the methodology to be employed and the targeting of particular groups or factors.

- 11.2.132 TfL's response refers to the comprehensive impacts monitoring programme planned in the event that the Scheme Order is confirmed. Collection of baseline data is currently in progress to provide a definitive picture of conditions before the introduction of the proposed scheme. TfL recognises that an effective and comprehensive monitoring programme requires ongoing close collaboration with numerous stakeholders and would need to retain flexibility to respond to particular issues as they arise. The Mayor has stated his commitment to changing the proposed scheme if it is not functioning as intended. Furthermore, results from the monitoring would be published and any significant modifications to the proposed scheme would be subject to public consultation.

- 11.2.133 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 28: Complementary Transport Measures

- 11.2.134 Representations and objections included under this theme related to concerns surrounding the provision of public transport alternatives to car travel, and tended to raise similar points to representations from the first round of consultation. Many representations voiced the opinion that public transport alternatives to car travel should be improved prior to the introduction of congestion charging; others expressed doubt that the necessary improvements would be possible in the time available; while others argued that the proposed improvements were, in any case, inadequate. In particular, concerns were expressed about the capacity of the National Rail and Underground systems to cope with any additional demand. Various alternative or additional complementary transport suggestions were also put forward.

- 11.2.135 TfL's response refers to the modelling work which has been undertaken. The results of this work suggest that the planned programme of measures would be more than

sufficient to cope with the additional demand on the public transport network as a result of congestion charging, and that these measures can and would be implemented before the introduction of the proposed scheme.

- 11.2.136 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate. In any event there would be a review of complementary transport measures in autumn 2002.

Theme 29: Traffic Management

- 11.2.137 Representations under this theme: stressed that adequate traffic management arrangements should be put in place to deal with displaced traffic; raised concerns about parking in peripheral areas around the proposed charging zone boundary; questioned how potential build-up of traffic at the end of charging hours would be addressed; raised concerns about roadworks and traffic signs; suggested a review of the London lorry ban; and raised concerns over reallocation of road space for business use, for cyclists, buses and for pedestrians.

- 11.2.138 TfL's response referred to the £100 million allocated for complementary traffic management schemes, and outlined the range of measures that would be introduced as part of the congestion charging scheme. London Boroughs have already submitted bids for funding for schemes and TfL has agreed funding for initial design and local consultation for some schemes. A portion of the budget would be held back and allocated post-implementation to address any traffic management issues that arise. TfL would continue to work with London boroughs and other partners to deliver effective traffic management if the Scheme Order is confirmed by the Mayor.

- 11.2.139 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 30: Impacts – Business

- 11.2.140 Representations and objections under this theme included suggestions that the potential benefits to businesses of the proposed scheme have been over-stated and the likely costs to local businesses under-estimated. Potential impacts cited included increased costs and loss of business, and the relocation of business. Specific local issues were raised including the impact on the entertainment industry.

- 11.2.141 TfL considers that the proposed scheme would reduce congestion and thus improve journey times and reliability for vehicles inside and beyond the proposed charging zone. The monitoring programme being developed by TfL would pay particular attention to the impacts on business. TfL considers, however, that adverse impacts on businesses are unlikely to be significant. Concerns about the entertainment industry were a key factor informing the proposed change in charging hours referred to elsewhere in this report.

- 11.2.142 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 31: Impacts – Environmental

- 11.2.143 Second round representations and objections reflected those from the first round and included representations regarding the impact of the proposed scheme on local air quality, noise levels and visual amenity problems, particularly on the proposed boundary route. The impact of routing boundary traffic along Kennington Lane was of particular concern and requests were made for an environmental impact assessment of the Inner Ring Road.
- 11.2.144 TfL considers that there is no legal requirement for an environmental impact assessment to be undertaken for the proposed Scheme. Nevertheless, TfL has assessed the potential effects of the scheme in accordance with the criteria set out in the relevant EC directives on the assessment of the effects of projects on the environment. Further information detailing TfL's consideration of this issue is available in chapter 7 and Annex E5. TfL has concluded that significant adverse environmental impacts are unlikely. TfL would ensure that the siting of traffic signs and enforcement cameras should be such that the visual impact in conservation areas would be minimised.
- 11.2.145 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 32: Impacts – Social / Economic

- 11.2.146 Representations included in this theme tended to repeat those received during the first round of consultation, and included suggestions that the scheme would result in community severance, an increase in the cost of living within the charging zone and a decrease in the quality of life for residents, particularly those living on the boundary. Particular concerns were raised regarding the impact upon vulnerable groups and the provision of health care in the proposed charging zone. Other representations raised concerns that the congestion charging scheme was inequitable, and suggested that it would lead to reduction in property prices, and that regeneration would be deterred.
- 11.2.147 TfL considers that the proposed scheme would have substantial economic and social benefits for London, and that the reduced congestion and scope for improved amenity resulting from the proposed scheme would help offset the expressed concerns regarding community severance and cost. Revenue raised from the proposed congestion charging scheme would be reinvested in public transport improvements in line with TfL's General Plan. The resulting transport improvements are expected to contribute towards increased social inclusion. TfL has planned a programme to monitor the social and economic impacts of the scheme, should it proceed, and has the ability to make changes if necessary.
- 11.2.148 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 33: Impacts – Traffic

- 11.2.149 A substantial number of representations raised the concern that the proposed scheme would simply displace traffic from within the charging zone to areas adjacent to the charging zone boundary. Other representations expressed doubts about the efficacy of the proposed scheme in reducing congestion, and / or concerns about increased congestion outside the charging hours proposed, 'rat running' or congestion outside and around the proposed charging zone. Particular local issues were raised concerning the potential impacts on residential streets including Kennington Lane, London parks, pedestrian and cyclist safety, and the possibility of increased parking stress at stations and in areas adjacent to the charging zone.
- 11.2.150 TfL considers that the traffic changes resulting from the proposed scheme would be manageable, and measures would be implemented to effectively deal with any adverse impacts. The proposed traffic management scheme is expected to reduce radial traffic by deterring some of those drivers who currently drive into the charging zone while increasing net orbital traffic as some drivers who would have otherwise driven through the charging zone divert around it. Overall, there is expected to be a reduction in traffic both inside and outside of the proposed charging zone.
- 11.2.151 The Inner Ring Road is expected to cater for much of the traffic diverting around the charging zone, and TfL is proposing a computer-controlled dynamic boundary management system to ensure that this major route would be able to accommodate the projected increase. TfL considers that the proposed system is an improvement on existing traffic management systems.
- 11.2.152 A total budget of £100 million has been identified for traffic management works to support the proposed scheme and mitigate any adverse impacts, particularly in the areas adjacent to the boundary of the charging zone. Also, a rigorous monitoring programme is proposed to identify any instances where the operation of the proposed scheme leads to environmental or social pressures.
- 11.2.153 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Theme 34: Technology

- 11.2.154 Representations and objections received in response to the second round consultation reflected those of the first. Included under this theme were concerns that the technology, computer systems and call centres would not be able to cope with the demands of such a scheme. Concerns were also raised about the ability to enforce the charge for foreign registered vehicles and unregistered vehicles. Other comments included concerns that the proposed technology is not sufficiently advanced, concerns about the capacity of the systems, and their testing in advance of the scheme going live.
- 11.2.155 TfL's consideration remains that the scheme proposals are based upon proven technology. TfL has also considered the potential scale of the various systems, including

the capability to search for owner details of foreign vehicles. The implementation programme would allow for each of the systems to be tested extensively before the scheme came into operation.

- 11.2.156 Following consideration of all representations and objections under this theme TfL recommends that no change to the scheme proposals or to the proposed modifications to the Scheme Order is appropriate.

Chapter 12: Proposed further modifications: following consultation, December 2001

12.1 Introduction

- 12.1.1 This chapter sets out TfL's proposed further modifications to the Scheme Order, following considerations of representations received in response to the December 2001 consultation and all other considerations. These proposed modifications are in addition to those proposed in Chapter 9.
- 12.1.2 The representations and objections leading to these further modifications are detailed in Chapter 11 and Annex G.

12.2 Proposed modifications

Payment Method

- 12.2.1 Within the arrangements for fleet operators, the charge to be 110% of the standard daily charge; rather than 115% as proposed in the December 2001 consultation.
- 12.2.2 Light vans to be eligible for the 'decrementing' arrangements for fleet operators; clarification that the annual charge of £10 applies to all vehicles within fleet account arrangements.

Alternative fuel vehicles

- 12.2.3 The 100% discount for vehicles 'eligible to be registered' in the TransportAction PowerShift database to be removed so that only 'vehicles registered in the database' would be eligible for the discount.

Buses and coaches with 9 or more seats

- 12.2.4 Extend the exemption or discount for public service vehicles with 9 or more seats, community buses and vehicles operated under section 19 of the Transport Act 1985 and their Northern Ireland equivalents to include all buses and coaches with 9 or more seats.

Discount for certain NHS staff

- 12.2.5 The NHS discount is to be extended to cover locums and agency staff providing the specified operational services on behalf of NHS bodies.

Scheme Operation

- 12.2.6 The charge to be paid at the standard daily rate of £5 until 10.00pm; rather than 8.00pm as proposed in the December 2001 consultation. Weekly, monthly and annual licences would also be able to be purchased up to 10.00pm on the first day of validity rather than up to 8.00pm.

Military Vehicles

- 12.2.7 The 100% discount for eligible military vehicles to be extended to vehicles being used under instructions from an official of the Ministry of Defence; in addition to military personnel.

Chapter 13: Consolidated summary of TfL's recommended modifications to the Scheme Order

13.1 Introduction

- 13.1.1 This chapter provides a summary of Chapters 9 and 12 of the report - a consolidated summary of the modifications that TfL is recommending be incorporated into the Scheme Order, if the Mayor decides that it be confirmed.
- 13.1.2 Some of the modifications have arisen as a result of TfL's consideration of the representations and objections received during the July 2001 consultation or as a result of developments arising from the Technical Design Study or other developments during this period. These modifications are listed in Chapter 9 of the report.
- 13.1.3 TfL undertook a further period of consultation in December 2001 on the modifications described above. Following consideration of the results of this consultation, TfL is recommending that the proposed modifications either be confirmed by the Mayor or are further amended before confirmation by the Mayor. TfL is also recommending that some further modifications are incorporated in the Scheme Order by the Mayor, if he is minded to confirm it. These new or further amended modifications are outlined in Chapter 12 of the report.
- 13.1.4 All the various recommended modifications have been incorporated into the text of the modified Scheme Order set out within Annex I, and are detailed below. It is important to understand that where a modification set out in Chapter 9 is itself modified or overtaken by a modification in Chapter 12, this is reflected in the form of the resultant modification in this chapter.

13.2 Recommended modifications

Days and Hours of Operation

- 13.2.1 Charging hours to be 7.00am to 6.30pm, instead of 7.00am to 7.00pm.

Payment Method

- 13.2.2 'Carnet Licences' to be introduced to allow charges to be paid through the issue of undated licences purchased in advance and subsequently validated for use on particular days.
- 13.2.3 The arrangements for fleet operators to be amended:
- to provide separate arrangements for light vans and goods vehicles, and for cars;
 - to include leased and hired vehicles;

- to require registration under each agreement of at least 25 vehicles;
- to allow TfL to charge up to 110% of the standard daily charge for this facility; and
- to include an annual charge of £10 per vehicle under such agreements.

Alternative Fuel Vehicles

- 13.2.4 The 100% discount for mono-fuelled gas vehicles to be extended to all alternative fuel vehicles, registered to specific groups in the TransportAction PowerShift database i.e. those meeting the required emission standards (based on the Euro III and Euro IV standards) and registered.
- 13.2.5 The requirement for certain alternative fuel vehicles to be registered and operated from a Greater London address to be removed.

Borough Operational Vehicles, Royal Parks Vehicles

- 13.2.6 The provision that there be an upper limit on the number of certain borough operational vehicles eligible for a 100% discount to be removed.
- 13.2.7 Royal Parks Agency operational vehicles to be treated in a manner comparable to qualifying borough operational vehicles, i.e. registered vehicles will receive a 100% discount.

Breakdown and Recovery Vehicles

- 13.2.8 The 100% discount for specially adapted recovery vehicles to be extended to vehicles constructed, adapted or equipped to provide roadside assistance or recovery services and operated by an accredited recovery organisation.
- 13.2.9 The requirement for certain recovery vehicles to be registered and operated from a Greater London address to be removed.

Vehicles used by disabled people

- 13.2.10 The requirement for vehicles used by disabled Blue Badge holders to be registered and operated from a Greater London address to be removed.
- 13.2.11 Clarification that Blue Badge holders 100% discount be limited to 2 vehicles per day
- 13.2.12 Blue Badge holders whose badge expires during the discount registration period to be offered the option to pay £10 when submitting proof of a new badge and to extend their discount registration period for one year.

- 13.2.13 Institutions in receipt of a Blue Badge to be treated in a comparable manner to individual Blue Badge holders.

Emergency service vehicles

- 13.2.14 The requirement for certain vehicles used for fire, police and ambulance purposes to be registered and operated from a Greater London address to be removed.
- 13.2.15 HM Coastguard and lifeboat haulage vehicles and Port of London Authority operational vehicles to be eligible for a 100% discount. Certain lifeboat vehicles exempt from vehicle excise duty to be exempt from charging.

Public Service Vehicles / buses and coaches with 9 or more seats

- 13.2.16 Extend the exemption or 100% discount for public service vehicles with 9 or more seats, community buses and vehicles operated under section 19 of the Transport Act 1985 and their Northern Ireland equivalents to include all buses and coaches with 9 or more seats.

Royal Mail Vehicles

- 13.2.17 The removal of 100% discount for Royal Mail liveried vehicles.

Residents' Vehicles

- 13.2.18 The eligibility for residents' discount is to be restricted to residents aged 17 years or over.
- 13.2.19 Residents of the proposed residents' discount zone to be restricted to registering one vehicle at any one time for the 90% discount.
- 13.2.20 Requirement for residents to notify TfL of a change of address within the residents' discount zone and to confirm continued eligibility.
- 13.2.21 Provision that a discounted licence becomes void if applicant ineligible.

Residents in specific locations adjacent to the boundary

- 13.2.22 In three small areas inside the Inner Ring Road but outside the central zone boundary, residents are to be eligible for the residents' 90% discount.

Boundary

- 13.2.23 The central zone boundary is to be adjusted at Mount Street, off Park Lane.

Vehicles used by firefighters

- 13.2.24 The introduction of a provision for a 100% discount for vehicles used by firefighters for operational travel between London fire stations.

Vehicles used by certain NHS staff

- 13.2.25 The introduction of a provision for a 100% discount for vehicles used by NHS staff (including locums and agency staff) who need to use their cars to carry controlled drugs, confidential patient records, bulky, heavy or fragile equipment or other specified material.

Private Hire Vehicles (minicabs)

- 13.2.26 Private hire vehicles (minicabs) to be eligible for exemption, once fully licensed under the London licensing system and the vehicle has been hired.

Scheme Operation

- 13.2.27 The charge may be 'pre-paid' 65 charging days in advance of the relevant charging day, rather than 56 calendar days.
- 13.2.28 A requirement to be introduced that complete applications for discount status must be received at least 10 charging days before the first charging day.
- 13.2.29 A requirement that complete applications for discount status starting within 3 months of the start of the scheme must be received at least 20 charging days before the first charging day.
- 13.2.30 The period for individual discount registrations initially to be between 12 and 15 months, to stagger the renewal of registrations.
- 13.2.31 The requirement to be removed that proof of different address from that previously provided by licence purchaser is needed for a licence refund.
- 13.2.32 The requirement to be introduced that postal applications requesting amendments must be received 7 charging days in advance and telephone applications 3 charging days in advance.
- 13.2.33 The provision for an amendment to a licence to allow an earlier charging date is to be added.
- 13.2.34 The provision to be introduced to ensure that, if TfL does not receive proper payment, the licence being purchased is void or the entry in the discount register is removed.
- 13.2.35 Vehicles to be removed from the discount register 7 charging days after a change of keeper unless renewed.
- 13.2.36 Vehicles to be removed from the discount register and notification to be given by TfL if

eligibility ceases.

- 13.2.37 90% residents' discount licences purchased improperly (e.g. using a stolen credit card) to be void.
- 13.2.38 The charge to be paid at the standard daily rate of £5 until 10.00pm, rather than 8.00pm, as proposed to be modified. Weekly, monthly and annual licences would also be able to be purchased up to 10.00pm on the first day of validity rather than 8.00pm.

Military Vehicles

- 13.2.39 Requirement that eligible military vehicles be registered with TfL to be eligible for 100% discount, rather than being exempt.
- 13.2.40 The 100% discount for eligible military vehicles to be extended to vehicles being used under instructions from an official of the Ministry of Defence; in addition to military personnel.

Use of Net Revenues

- 13.2.41 The estimate for the scheme's net revenues quoted in the Scheme Order to be revised to £130 million per year.

Project timetable

- 13.2.42 The date in the Scheme Order for the start of charging is to be changed from 14 months after confirmation to 12 months after confirmation of the Scheme Order; and the date for other parts of the Scheme Order coming into effect to be changed from 9 months after confirmation to 8 months after confirmation.

Vehicles from Northern Ireland

- 13.2.43 A provision to be introduced to define certain discount categories for vehicles registered in Northern Ireland.

Europe

- 13.2.44 Extension to vehicles from Member States of the European Union or European Economic Area of discounts and exemptions for VED exempt ambulances, invalid carriages and vehicles used for the carriage of disabled people by a recognised body, public service vehicles, vehicles with 9 or more seats and recovery and accredited breakdown vehicles. Extension of Blue Badge discount to holders of equivalent badges in European Union states. Extension of the fleet account facility to vehicles registered in European Economic Area states.

Other minor changes

- 13.2.45 A number of minor changes to improve the clarity and structure of the Scheme Order, and to correct errors and omissions.

Chapter 14: The procurement, financial and cost-benefit implications of the scheme proposals

14 The social cost/benefit and financial implications of the recommendations

14.1 Introduction

- 14.1.1 This chapter provides details of the financial position of the proposed congestion charging scheme, and goes on to assess its social cost-benefit implications, were it to be implemented in accordance with the Scheme Order.
- 14.1.2 Section 14.2 outlines the current position following the selection in December 2001 of Capita as the preferred bidder for the core, retail and image services. Section 14.3, goes on to summarise the current financial position recommendations following the two rounds of public consultation on the Scheme Order. Section 14.4 covers other financial effects.
- 14.1.3 Sections 14.5 – 14.8 deals with the social cost-benefit analysis of the scheme proposals: 14.5 sets out how direct costs drawn from the budget information have been used in the social cost-benefit analysis along with indirect costs such as scheme compliance and additional public transport provision, while 14.6 provides details of how the projected benefits of the scheme have been quantified. 14.7 presents the social cost-benefit analysis itself, which shows positive net benefits between two and six years after introduction. Section 14.8 indicates the broad distribution of costs and benefits.

14.2 Procurement of scheme infrastructure and services

- 14.2.1 TfL has not entered any contracts for scheme infrastructure or for scheme operational services. However, following a technical and commercial competition and the selection of a preferred service provider for core services, image management services and retail services, TfL has entered a series of 'Call Option Agreements' for scheme infrastructure and services. These allow the continued development of the scheme in a manner compatible with achieving the earliest start to charging. They also limit TfL's financial exposure in the event that the Mayor decides to hold a public inquiry into the scheme, to modify the scheme, to consult further, or not to confirm the Scheme Order.
- 14.2.2 Under the Call Option Agreements for cameras, telecommunications and core, retail and image management services, the selected service provider has signed the contract with TfL, but TfL has until a series of specified dates in late February to mid March 2002 to execute the various contracts. This would only take place after confirmation of the Scheme Order.
- 14.2.3 These Call Option Agreements provide for a controlled level of expenditure by each of the service providers which defers significant capital expenditure on equipment and substantive works on the street. Work is proceeding on the detailed phasing and preparatory works under each of the agreements. This includes the installation of 56 camera sites under the camera and telecommunication agreements for trials and monitoring purposes and refinements and demonstrations of the core systems.

14.3 Financial position

- 14.3.1 Appendix A to this chapter provides details of the latest estimates of the scheme implementation and operational costs, taking account of a revised earliest start date for the scheme and the latest information on the introduction of traffic management measures following discussions with the Boroughs. It represents an update on the budget provided to TfL's Finance and Audit Committee on 24 January 2002, and has been revised in three important areas. Firstly, it has been extended from the original five year period to cover ten years (to reflect the hypothecation period during which revenues from the scheme must be spent on public transport improvements). Secondly, the costs shown in 2002/3 have been adjusted to reflect the proposed amendments to the scheme following the consultation exercise. Thirdly, the revenue projections have been revised to reflect the proposed fleet management system, the latest proposals regarding discounts and exemptions, and the proposed shift in the scheme finish time from 7.00pm to 6.30pm.
- 14.3.2 Appendix A also provides a net present value assessment of the scheme income and expenditure over the ten year hypothecation period. Total start-up and operating costs amount to about £720 million using a discount rate of 6% per year. Total discounted revenues are estimated to amount to about £1500 million based on annual charging revenues of around £230 million and excluding any surplus from penalty charges. The net result is a discounted financial surplus of some £780 million over the life of the scheme, assuming an end date of February 2013.
- 14.3.3 The table below shows the latest projections regarding the numbers of vehicles travelling within the charging zone on an 'average' day, and the resultant annual income from each category of vehicle.

	Estimated daily number of motor vehicles within charging zone	Projected annual revenues from charging £ million
Motorcycles	24,000	0
Cars – standard charge	91,000	110
– fleet arrangements charge	34,000	44
– residents' discount	21,000	6
– disabled persons' discount	8,000	0
Taxis	16,000	0
Buses, coaches, exempt minibuses	7,000	0
Private Hire Vehicles (following full licensing of 'minicabs')	4,000	0
Vans – standard charge	20,000	24
– fleet arrangements charge	15,000	20
Lorries – standard charge	8,000	10
– fleet arrangements charge	7,000	9

Other vehicles	11,000	0
Discount and fleet registrations		4
Total excluding penalty charges	266,000	227

- 14.3.4 The central estimate of the surplus for penalty charges is £30 million. This is not included in the current estimates of the expected net revenues, but any such surplus would contribute to investment in transport within Greater London.
- 14.3.5 Revenues from the scheme will depend on the sensitivity of driver responses to the charge, the degree of compliance with the Scheme Order, the extent to which discounts are applied for, the number of 'post-payments' at the higher rate and the extent to which the special arrangements for fleet operators are taken up. There is also a seasonal effect to take into account, to reflect those periods when traffic levels in central London are somewhat lower than 'average'.
- 14.3.6 Further analysis, which incorporates the recent procurement decisions, suggests a range of annual net revenues: a lower figure of £130 million and an upper figure of £150 million, both excluding any surplus from penalty charges. For prudent business planning purposes, in the interest of these various uncertainties, the annual net revenue from the scheme has been assumed in the TfL Business Plan and Budget to be £130 million in each full financial year from 2003/04. This figure has also been used in Annex 2 to the Scheme Order, as proposed to be modified.
- 14.3.7 It should also be noted that the forecast budget in Appendix A is subject to some further change to reflect:
- final decision on a series of scope options available under the core, retail and image management contracts;
 - development and programming of traffic management schemes;
 - review of proposed further discounts and exemptions and associated loss of income; and
 - final decision on the provision of ANPR equipment and the development of a TfL fibre network for congestion charging.
- 14.3.8 The TfL Board and Finance and Audit committee will continue to receive updated estimates of the costs and revenues of the proposed scheme.
- 14.3.9 As required by law, the net proceeds must be invested in transport within Greater London – in projects and programmes that deliver 'value for money'. This is discussed later under the section on social cost-benefit analysis.

14.4 Other financial effects

Public transport fare revenues

- 14.4.1 Within the context of overall fare revenues and the year on year changes that result from fare adjustments and other factors, the direct financial impact of car users switching to

public transport as a consequence of congestion charging would be relatively small. However, the effects would be real and the projections are given here for completeness.

- 14.4.2 Drawing on the model assumptions and projections for mode change, and on the split between public transport modes, the annual increases in public transport revenues directly attributable to congestion charging are estimated to be of the following magnitudes:

	Base passenger receipts 2000/2001 £ million	Base passenger volumes 2000/2001 (millions of passengers)	Projected increase in revenue per year £ million
Bus	656	1,354	+8 to +12
Underground	1,131	970	+4 to +6
National Rail	1,732	656	+5 to +8

Fuel tax revenues

- 14.4.3 The net transfer of some car trips to public transport would reduce the consumption of fuel across London. In turn this would result in a small reduction on Government tax revenues. Again, in the context of the overall tax on road fuel collected from with Greater London, these are very small changes. Based on the forecast reduction in vehicle kilometres, and after taking account of a certain amount of new car travel under the higher sensitivity projections, the annual reduction is estimated to be between - £10 million and - £17 million per year.

Parking revenues

- 14.4.4 The net reduction of 15 to 25% in car trips into the charging zone would have an impact on parking charge revenues for both public sector and private sector parking operators. Based on the current split between private non-residential parking, public off street parking and on-street parking, it is estimated that annual gross parking revenues would be reduced by between - £25 million and - £45 million per year.
- 14.4.5 Perhaps two-thirds of the reduction in parking activity would affect parking operated by those London Boroughs that come wholly or partially within the charging zone: principally the City, Camden, Westminster, Lambeth and Southwark. This would assist their restraint-based parking policies but would also have an effect on the revenues they derive from parking operations. There would be offsetting reductions in the costs of operating and enforcing parking controls and so the net impact on the parking revenues of those boroughs inside the charging zone is estimated to be of the order of £10 million to £20 million. There could be some modest increases in parking revenues outside the charging zone.
- 14.4.6 It should be noted that the boroughs experiencing the greatest reduction in parking revenue are also those that would benefit the most from reduced congestion.

14.5 Social cost-benefit analysis – costs included

- 14.5.1 The social cost-benefit analysis attempts to compare the costs of introducing and operating the proposed scheme with the social benefits from the impacts of the scheme. It provides an appraisal alongside the financial assessment of the value for money of the project. It seeks to embrace all significant costs and benefits arising directly from the scheme.
- 14.5.2 Direct costs have been derived conventionally from estimates, established rates, bid or negotiated contracts. Most costs have been derived from the budget attached at Appendix A, and have been rounded to the nearest million for this analysis. Benefits are primarily a conventional 'willingness to pay' evaluation of the traffic and transport impacts as deduced from the model projections.
- 14.5.3 Congestion charging payments by vehicle drivers and operators, additional public transport fare revenues and other financial transfers – which are outside the social cost-benefit analysis – are considered in later sections below.
- 14.5.4 Although the costs included in the social cost-benefit analysis are drawn from the Appendix A financial information, the presentation and inclusion criteria differ in several areas reflecting the differing purposes of the two exercises.
- 14.5.5 For instance, the Appendix A financial information covers financial years from 2000/01 to 2012/13, during which the scheme is assumed to be operational for ten years commencing February 2003. Under this assumption, costs for the final financial year (2012/13) are reduced to reflect the assumption that the scheme would not be in operation for the whole of that financial year. It should be noted that, in order to extend the financial projections to ten years to cover the hypothecation period, the figures relating to the last full financial year (2006/07) of the original 24 January 2002 Finance and Audit committee submission have been taken as representative of the operating costs of the scheme during the additional five years. In reality, costs are likely to reduce somewhat over this phase of the scheme.
- 14.5.6 The social cost-benefit analysis covers the financial years from 2002/03 to 2012/13, and takes the total cost data for the ten year operational phase from the extended ten year analysis in Appendix A described above. However, it does not cover years prior to 2002/03 as sunk costs are disregarded. For simplicity, the social cost-benefit analysis assumes that the scheme begins at the start of financial year 2003/04 and runs until the end of the 2009/10 financial year.
- 14.5.7 It is important to note that the social cost-benefit analysis does not include all expenditure by TfL allocated in the Appendix A financial summary. As stated above, sunk costs are disregarded, as are subsequent costs associated with activities which are related to but essentially separate from the implementation and operation of the scheme, such as monitoring activities. These have real costs, but no attempt has been made here to estimate the social benefit of the scheme monitoring programme. Future traffic modelling work, communications activities and other TfL work also fall outside this social cost-benefit analysis.

14.5.8 For the purposes of the social cost-benefit analysis, the costs associated with the introduction of the proposed scheme have been grouped under the headings below. For quick reference, the total costs allocated to each category over the assumed ten-year hypothecation period are as follows:

	Total over 10 years (cash, £m)
Annual TfL supervisory and management costs	81
Scheme installation (and start-up) costs	15
Scheme operation costs	735
Allocated traffic management costs	40
Allocated additional public transport costs – London buses	176
Scheme compliance costs to road users	200
Total	1245

14.5.9 These headings represent simplifications of the costs used in the financial information included in Appendix A to this chapter. The rationale behind the simplified headings is explained in Appendix B to this chapter along with details of the assumed profile of all allocated costs and the resultant comparison of the profiles of discounted costs and benefits.

14.5.10 Key points to note are that:

- monitoring and certain other costs are excluded, as discussed above;
- the social cost-benefit analysis concentrates on costs directly attributable to the scheme;
- 40% of the total traffic management costs have been included in the social cost-benefit analysis to reflect the fact that many of the schemes being funded would be installed under other programmes;
- benefits from traffic management schemes are not taken into account; and
- no account of surplus revenue arising from penalties.

14.5.11 Two other costs are included in the social cost-benefit analysis at Appendix C which are not part of the budget-based financial information shown in Appendix A: additional public transport costs; and compliance costs. Both are explained below.

Allocated additional public transport costs – London buses

14.5.12 These costs are not a direct charge to the project and hence have not been shown in the financial budget at Appendix A. They have been based on the costs to London Buses of providing additional peak period bus services into the central area. After discussion with London Buses the allocated cost is £18million per year, based on 220 additional buses with an average attributable cost to the congestion charging scheme of £80,000 per year.

The fare revenue from these additional buses has been included above; the benefits to existing bus passengers are not included in the later section on benefits.

Scheme compliance costs – road users

- 14.5.13 Compliance costs are an important consideration, but again are not a budget item and hence included in Appendix A. Compliance costs are the costs incurred by road users of conforming to the requirements of the Scheme Order. These have been assessed as a combination of inconvenience – essentially the time consumed in the transaction to pay the charge – and the resource costs such as postal or telephone charges. Inconvenience can be valued in broad terms on the basis of ‘willingness to pay to avoid’. Calculating and evaluating these costs is somewhat arbitrary as it is not yet clear how the pattern of payments will settle down. Fleet operators will have somewhat simplified arrangements.
- 14.5.14 However, other than for exempt vehicles, these compliance costs are real and initially could amount to several minutes per transaction. For many the payment of the charge will become routine; for others it could remain a noticeable inconvenience. Business users will largely consume staff working time to handle the transaction; other users will largely consume their own time in handling the transaction.
- 14.5.15 The combination of average ‘willingness to pay to avoid’ time spent on payment transactions coupled with the average monetary costs is taken typically to be 50 pence per transaction. With 40 million or so transactions per year this produces total compliance costs of the order of £20 million per year.

14.6 Social cost-benefit analysis – benefits included

- 14.6.1 The traffic and transport benefits from the scheme are estimated primarily from the LTS model projections of the traffic and transport effects. This is considered to be a more detailed and reliable approach than modifying the AREAL/APRIL model projections as in earlier assessments. Overall, however, the latest estimates of scheme benefits are comparable to the estimates provided in July 2001 for public consultation on the Scheme Order.
- 14.6.2 Broadly, the measurable benefits can be categorised as follows:
- Time savings to vehicle occupants who continue to travel on the road system after the introduction of charging. This includes the occupants of cars, taxis, commercial vehicles and buses, inside and outside the charged area. The valuation of these benefits is conventional, using separate values for time savings on employers' business and in non-working time.
 - Inconvenience to those previous car users who transfer to public transport to avoid the charge. These have been estimated conventionally as a disbenefit amounting on average to half the charge level being avoided.
 - Improved journey time reliability, over and above direct time savings. This is based on the relative benefits deduced by the London Congestion Charging Research Programme and utilised by the consultants for the ROCOL study. It recognises that the measured time savings and the unmeasured ability to choose a more preferred time of

travel for individual journeys as a result of reduced congestion can be converted into further benefits.

- Accident changes, mainly resulting from the transfer of road users to public transport, but also recognising that there could be some increase in use of motorcycles and pedal cycles.
- Reduced fuel and other vehicle costs.

14.6.3 The value of time savings to existing motor and pedal cyclists is not included in the social cost-benefit analysis, as these road users represent a relatively small proportion of total traffic and will probably gain less than other types of road user from reduced congestion and shorter traffic queues.

14.6.4 The environmental benefits of the scheme in terms of improved air quality, pedestrian amenity or reduced traffic noise are expected to be small and have not been examined further, though with less congestion the scheme may allow other worthwhile initiatives inside the charging zone to proceed more readily. For example, the scheme would facilitate the World Squares project by reducing traffic in the vicinity of Trafalgar and Parliament Squares.

14.6.5 The resultant estimates, based on the lower and higher sensitivity responses to charging and decongestion, are as follows, assuming charging from 7.00am to 6.30pm:

Projected annual benefits	£ million	
	Lower sensitivity	Higher sensitivity
Car occupants on employers' business	30	40
Car occupants in non-working time	25	35
Taxi occupants – generally on employers' business	25	35
Bus occupants – generally in non-working time	10	20
Commercial vehicle occupants - on employers' business	15	20
Disbenefits to car users transferring to public transport	-15	-20
Reliability savings to continuing road users	30	40
Accident savings	10	15
Savings in vehicle operating costs	5	10
Total	135	195

14.6.6 As stated previously, the net proceeds of the scheme are estimated prudently to be at least £130 million per year. Benefits arising from the expenditure of the net proceeds on transport are not included. Assuming that such benefits were additive, after perhaps two or three years they could generate an additional £100 million or so of additional travel time, accident and other savings per year – provided they did not diminish the impact of the congestion charging scheme.

14.6.7 There will be additional direct and indirect impacts arising from the essential expenditure of traffic management to ensure, for example, that the road network can handle variations

in the traffic displaced from the charging zone, or that displaced traffic does not penetrate residential areas. No attempt has been made here to evaluate the benefits of these traffic management interventions; as discussed above only a proportion of traffic management costs have been taken into the social cost-benefit analysis.

14.6.8 The benefits above are expressed in 2003 values and 2001 prices. They have been calculated allowing for the diminished value of a £5 charge in 2003. If the Scheme Order is confirmed as now proposed and the scheme is introduced in 2003, the influence of a £5 charge and the overall impact of the scheme will be affected in subsequent years by:

- inflation, reducing the effective value of the £5 charge and the impact of the scheme;
- increased affluence, further reducing the effective value of the £5 charge and the impact of the scheme, but increasing the value of the benefits of the scheme; and
- increasing demands for car use and hence potentially increasing the levels of congestion which would otherwise apply.

14.6.9 The combination of these effects, at least in the medium term, is considered to be broadly neutral in terms of the valuation of the scheme benefits, particularly if general price inflation remains low.

14.7 Social cost-benefit analysis – comparing costs and benefits

14.7.1 The detailed comparison of costs and benefits is at Appendix C to this chapter. The salient conclusions are that the Scheme Order as proposed to be modified would result in a scheme where the projected benefits exceed the projected costs. For the lower sensitivity projections of benefits, this occurs early in the scheme's sixth year of operation; for the higher sensitivity projections of benefits, this occurs early in the second year of operation.

14.7.2 Using a discount rate of 6% and a base year of 2001/02, the discounted cumulative costs and benefits for a scheme with charging hours of 7.00am to 6.30pm, and assumed to commence at the start of financial year 2003/04 and to operate for ten years, are:

£ million discounted	02/0 3	03/04	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13
Cumulative Costs	58	180	280	371	457	539	617	689	758	823	884
Cumulative Benefits – lower	0	120	233	340	441	536	626	711	791	866	937
Cumulative Benefits – higher	0	169	329	479	621	755	881	1001	1113	1219	1319

14.7.3 The benefit cost ratio is 1.1 for the lower sensitivity benefits and 1.5 for the higher sensitivity benefits. An increase in the real value of the charge would increase the sensitivity and raise both the lower and higher estimates of the benefits.

14.7.4 If the Mayor confirms the Scheme Order, TfL intends as part of its monitoring programme to put in place studies that would eventually allow better understanding of driver responses to congestion charges in central London – and hence allow a single central estimate of the social benefits of the scheme.

14.7.5 As previously discussed, after a few years the benefits of the subsequent investment of the net proceeds of the scheme could be of the order of £100 million per year. If these were considered additive, they could add perhaps £500 million to the discounted cumulative benefits by 2012/13.

14.8 Distribution of costs and benefits

14.8.1 Insufficient data exists to provide a full analysis of ‘winners’ and ‘losers’ from the proposed scheme. The extent of discounts and exemptions, coupled with the other initiatives under the Mayor’s Transport Strategy, further complicate the issue.

14.8.2 Nevertheless, as with previous studies, a key factor in the distribution of costs and benefits is the distinction between those who pay the charge or who change their travel patterns to avoid the charge; and those who do not have to pay the charge or who pay a much reduced charge.

14.8.3 In general terms most of those who pay the standard £5 charge will be ‘losers’ – they will be unlikely to experience reduced congestion sufficient to offset the financial loss of the charge. There will be some road users paying the charge, such as delivery vans making multiple journeys into the charging zone, who will experience offsetting benefits, but the value of the time and reliability savings to charge payers – up to perhaps the equivalent of ten minutes on a round trip into the charging zone – would usually be less than the £5 charge incurred.

- 14.8.4 Those making journeys into the charging zone who are eligible for a discount or whose vehicles are exempt from the charge, would consider themselves 'winners'. Taxi occupants and coach and bus passengers would be three obvious examples (accounting for 11%, 9% and 24% of vehicle occupants within the zone respectively).
- 14.8.5 Some of those who transfer to public transport or avoid driving through the charging zone would consider themselves 'losers'; as they are not travelling by their preferred mode or on their preferred route. However, others could regard themselves as winners, if they transfer in response to improved bus operations as a consequence of charging. These 'voluntary' transfers to public transport are outside this assessment of benefits.
- 14.8.6 The great majority of motor vehicle journeys made outside the charging zone would secure time and reliability savings, without incurring a charge. They would be classified as winners. Some journeys made in the vicinity of the charging zone on particular routes at peak times may experience some additional delay, though much would depend on the effectiveness of the traffic management arrangements. The key point for journeys outside the charging zone, however, is that the time savings would be generally relatively small and particularly in outer London might not be noticed.
- 14.8.7 Overall, London would be a winner: benefits would exceed costs. However, the congestion charges and compliance costs incurred by road users would exceed the combined benefits to payers and non-payers of the charge. This is to be expected: the underlying rationale of the congestion charging scheme is to raise the total cost of using a motor vehicle, so that drivers are presented with a more realistic appreciation of the congestion they impose on other road users, while reducing the total costs of using public transport.
- 14.8.8 Although it is not possible to show how the impacts would fall on a particular mix of journeys or across any particular social group, the following simple analyses show the broad pattern of 'winners' and 'losers' – by category of vehicle in terms of journeys made on a typical day. This embraces each category vehicles within and vehicles outside the proposed charging zone.

	Projected annual benefits to vehicle occupants excluding accident savings and disbenefits from transfers to public transport £m		Projected annual congestion charges and compliance costs £m
	Lower sensitivity	Higher sensitivity	Central estimate
Cars – occupants on employers' business	40	55	65
Cars – occupants in non-working time	30	40	115
Taxis – occupants generally on employers' business	35	50	0
Buses – occupants generally in non-working time	15	25	0
Commercial vehicles – occupants on employers' business	20	30	65

Sub-total – vehicles with occupants on employers' business	90	125	130
Sub-total – vehicles with occupants in non-working time	50	75	115
Total	140	200	245

14.8.9 In the table it is assumed that about three-quarters of the benefits to taxi occupants are to those on employers' business. The result is that under the higher sensitivity projections, employers would recover over 90% of congestion charges and compliance costs paid by commercial vehicles or those using cars or taxis for business travel. Under the lower sensitivity projection the proportion recovered by employers is around 70%.

14.8.10 However, any final judgements on the distribution of 'winners' and 'losers' of the charging proposals needs to consider how the impacts of the expenditure of the net proceeds – and the Mayor's Transport Strategy more generally – would fall on different groups. The monitoring programme associated with the proposed scheme is designed to explore the impacts in more detail.

Appendix A: Congestion charging scheme budget summary at 6 February 2002

TfL Congestion Charging Scheme													CHAPTER 14 Appendix A			
Budget Summary (NPVs are all at 2000/01 prices using a 6.0% real discount rate)	Total NPV	Total														
	@ 6% real	Real	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	
Annual running costs																
Operational costs (including DVLA payments, Adjudication, Enforcement)	52.3	78.2			3.3	7.7	7.7	7.7	7.7	7.7	7.7	7.7	7.7	7.7	7.7	5.8
Combined Services Contract (Core, Image, Retail) - Capita	408.0	616.0			13.1	61.8	60.3	60.8	61.3	61.3	61.3	61.3	61.3	61.3	61.3	52.0
Telecommunications Contract - Colt	16.1	22.8			0.4	5.4	3.8	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.1
Telecommunications Contract - BT	13.5	18.9			0.3	4.9	3.8	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.2
Cameras Maintenance Contract - Initial	3.4	5.2			0.0	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Monitoring Contract - MVA	2.0	2.5			0.3	1.1	0.6	0.5								
CCS management and support services	33.1	49.1			1.3	7.3	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	4.6	3.5
Traffic management	8.2	12.3			0.3	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	0.9
Scheme integration, strategy, legislation, modelling & monitoring (non capital)	6.8	9.5			0.5	2.0	1.6	1.3	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.5
Start-up costs																
Scheme integration, strategy, legislation, modelling & monitoring (non capital)	5.0	5.4		2.8	2.6											
Operations and systems set-up	21.3	23.3		12.0	10.9	0.4										
Combined Services Contract (Core, Image, Retail) - Capita																
Telecommunications Contract - Colt																
Cameras Supply and Installation Contract - Initial	3.6	3.9		3.3	0.6											
Monitoring Contract - MVA	1.2	1.3		0.5	0.8											
Market Research Contract - MVA	0.4	0.5		0.1	0.5											
Enforcement infrastructure	2.8	3.0		2.2	0.8											
Traffic management	88.8	100.2		20.4	50.8	28.9										
Project management and support services	12.6	13.2	4.7	5.4	2.7	0.4										
Communications and public information (excluding Market Research - Capital)	13.9	15.4	0.5	2.2	12.5	0.2										
CCS Management & Support Services	14.0	15.1		11.1	4.0											
Contingency	11.4	15.0			1.0	2.8	2.8	2.8	2.8	2.8						
Total Costs	718.5	1010.8	5.2	60.0	106.8	124.6	87.0	82.4	81.8	81.8	79.0	79.0	79.0	79.0	65.3	
Revenues (excluding PCN income)	-1499.2	-2273.0			-26.2	-227.3	-227.3	-227.3	-227.3	-227.3	-227.3	-227.3	-227.3	-227.3	-201.1	
Net Operating Surplus	-780.7	-1262.2	5.2	60.0	80.5	-102.7	-140.3	-144.9	-145.5	-145.5	-148.3	-148.3	-148.3	-148.3	-135.8	

* Revenue figures above represent current expected revenue as at 6 February 2002.

14B Appendix B: Cost-Benefit Profile

- 14B.1 The following pages show the cost-benefit calculations as described in chapter 11. As detailed in paragraph 14.5.9, there are some variations in the presentation of costs between the budget attached at Appendix A and the cost benefit analysis (attached separately). The section below outlines the costs included under each of the cost benefit analysis headings, and relates them to the figures included in the Appendix A budget.

TfL supervisory and other costs

- 14B.2 This heading collates all costs associated with TfL's management of the scheme and administration of contracts with service providers and so draws together costs shown under several cost-lines in the Appendix A Budget. Specifically, it consists of the *CCS management and support services* cost-line, plus those staff costs associated with operational management and currently included in the *Operational costs* line of the Appendix A Budget. These staff costs are £1.5m for 2002/03 and £1.8m each year thereafter. The heading also includes the *Project management and support services* and *CCS Management & Support Services* lines from the *Start-up costs* section of the Appendix A Budget.

Scheme installation and start-up costs

- 14B.3 This heading summates those costs associated with the procurement, installation and set-up of the infrastructure, services and processes necessary for the proposed scheme. The figures are drawn from the cost lines under the Start-up costs heading on the Appendix A Budget, but do not include costs relating to Traffic Management, CCS management or Project management, as these are itemised under separate headings in the Cost Benefit Analysis. It should also be noted that the Monitoring Contract - MVA cost line is not included as monitoring work falls outside the scope of the cost-benefit analysis. For the same reason, only £0.9m of the £2.6m costs for 2002/03 shown in the Scheme Integration, strategy, legislation, modelling and monitoring line of the Appendix A Budget are included in the cost-benefit analysis as the remainder of the £2.6m figure represents costs associated with monitoring work and the Scheme Order.

Scheme operation costs

- 14B.4 This heading summates the annual running costs associated with the operation of the Congestion Charging Scheme, as included under the *Annual running costs* heading on the Appendix A Budget. The *Monitoring Contract – MVA* cost line has not been included as it is outside the scope of the cost-benefit analysis while *Traffic Management* and *CCS management and support* have not been included as they are itemised separately. As noted in chapter 11, only a proportion of the *Scheme Integration, strategy, legislation, modelling and monitoring* line has been included in the cost-benefit analysis as the remainder represents monitoring and other costs, which fall outside the definition of scheme costs for the cost-benefit analysis. The *Operational costs* line is not included in full as staff costs have been included under the *TfL Supervisory and other costs* line of the cost-benefit analysis.

Allocated traffic management costs

- 14B.5 This aggregates the traffic management costs presented under the Annual Running costs and Start-up costs sections of the Appendix A Budget. The traffic management costs included in the cost-benefit analysis are 40% of the total traffic management costs shown in the Appendix A Budget. This reflects the fact that although these schemes qualify for funding from the scheme budget because they complement congestion charging, they are of value in their own right and many would be implemented, though perhaps at a later date, even if the Mayor determined not to confirm the Scheme Order. Such traffic management schemes are not, therefore, considered a cost of congestion charging in cost-benefit terms; nor are their benefits assessed under this analysis.

Appendix C: Congestion charging scheme cost-benefit analysis

Inputs - in cash terms

	Financial year											Total
	2002/03	2003/04 assumed scheme start	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	
Costs - input values	<i>Note</i>											
TIL supervisory and other costs	10	9.5	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	6.8	81
Scheme installation costs	15	0.4										15
Scheme operation costs	16	78	74	71	71	71	71	71	71	71	71	735
Allocated traffic management costs	20	12	1	1	1	1	1	1	1	1	1	38
Allocated additional public transport costs - London Buses		18	18	18	18	18	18	18	18	18	18	176
Scheme compliance costs - road users		20	20	20	20	20	20	20	20	20	20	200
Total costs - central estimate	61	138	119	116	116	116	116	116	116	116	116	1245

Benefits - Lower Sensitivity	<i>Note</i>											
Benefits to car and taxi occupants in working time		60	60	60	60	60	60	60	60	60	60	600
Benefits to commercial vehicle operators		15	15	15	15	15	15	15	15	15	15	150
Benefits to bus occupants		10	10	10	10	10	10	10	10	10	10	100
Benefits to other road users		25	25	25	25	25	25	25	25	25	25	250
Journey time reliability benefits		30	30	30	30	30	30	30	30	30	30	300
Accident savings		10	10	10	10	10	10	10	10	10	10	100
Fuel and other savings		5	5	5	5	5	5	5	5	5	5	50
Disbenefits to transferred car occupants		-15	-15	-15	-15	-15	-15	-15	-15	-15	-15	-150
Reduced benefits for shortened charging hours		-5	-5	-5	-5	-5	-5	-5	-5	-5	-5	-50
Total benefits - lower sensitivity		135	135	135	135	135	135	135	135	135	135	1350

Benefits - Higher Sensitivity	<i>Note</i>											
Benefits to car and taxi occupants in working time		80	80	80	80	80	80	80	80	80	80	800
Benefits to commercial operators		20	20	20	20	20	20	20	20	20	20	200
Benefits to bus occupants		20	20	20	20	20	20	20	20	20	20	200
Benefits to other road users		35	35	35	35	35	35	35	35	35	35	350
Journey time reliability benefits		40	40	40	40	40	40	40	40	40	40	400
Accident benefits		15	15	15	15	15	15	15	15	15	15	150
Fuel and other savings		10	10	10	10	10	10	10	10	10	10	100
Disbenefits to transferred car occupants		-20	-20	-20	-20	-20	-20	-20	-20	-20	-20	-200
Reduced benefits for shortened charging hours		-10	-10	-10	-10	-10	-10	-10	-10	-10	-10	-100
Total benefits - higher sensitivity		190	190	190	190	190	190	190	190	190	190	1900

Appendix C: Congestion charging scheme cost-benefit analysis

	Financial Year											Total	Net Benefits (B/C ratio)
	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13		
<i>NPV factor</i>	1.06	1.12	1.19	1.26	1.34	1.42	1.50	1.59	1.69	1.79	1.90		
Costs	<i>Note</i>												
<i>see sheet 2 for cash values</i>													
TfL supervisory and other costs	9	8	6	5	5	5	5	4	4	4	4	59	
Scheme installation costs	14	0	0	0	0	0	0	0	0	0	0	15	
Scheme operation costs	15	69	62	56	53	50	47	45	42	40	37	516	
Allocated traffic management costs	19	11	1	1	1	0	0	0	0	0	0	34	
Allocated additional public transport costs	0	16	15	14	13	12	12	11	10	10	9	122	
Scheme compliance costs - road users	0	18	17	16	15	14	13	13	12	11	11	139	
Total opportunity costs - central estimate	58	122	100	92	86	82	77	73	69	65	61	884	
<i>Cumulative costs</i>	<i>58</i>	<i>180</i>	<i>280</i>	<i>371</i>	<i>457</i>	<i>539</i>	<i>617</i>	<i>689</i>	<i>758</i>	<i>823</i>	<i>884</i>		
Benefits - lower sensitivity	<i>see sheet 2 for cash va. Note</i>												
Benefits to car and taxi occupants in working time		53	50	48	45	42	40	38	36	34	32	417	
Benefits to commercial operators		13	13	12	11	11	10	9	9	8	8	104	
Benefits to bus occupants		9	8	8	7	7	7	6	6	6	5	69	
Benefits to other road users		22	21	20	19	18	17	16	15	14	13	174	
Journey time reliability benefits		27	25	24	22	21	20	19	18	17	16	208	
Accident benefits		9	8	8	7	7	7	6	6	6	5	69	
Fuel and other savings		4	4	4	4	4	3	3	3	3	3	35	
Disbenefits to transferred car occupants		-13	-13	-12	-11	-11	-10	-9	-9	-8	-8	-104	
Reduced Benefits from shorter charging hours		-4	-4	-4	-4	-4	-3	-3	-3	-3	-3	-35	
Total benefits - willingness to pay - lower sensitivity	120	113	107	101	95	90	85	80	75	71	937	53	
<i>Cumulative benefits</i>	<i>120</i>	<i>233</i>	<i>340</i>	<i>441</i>	<i>536</i>	<i>626</i>	<i>711</i>	<i>791</i>	<i>866</i>	<i>937</i>		1.1	
Benefits - higher sensitivity	<i>see sheet 2 for cash va. Note</i>												
Benefits to car and taxi occupants in working time		71	67	63	60	56	53	50	47	45	42	555	
Benefits to commercial operators		18	17	16	15	14	13	13	12	11	11	139	
Benefits to bus occupants		18	17	16	15	14	13	13	12	11	11	139	
Benefits to other road users		31	29	28	26	25	23	22	21	20	18	243	
Journey time reliability benefits		36	34	32	30	28	27	25	24	22	21	278	
Accident benefits		13	13	12	11	11	10	9	9	8	8	104	
Fuel and other savings		9	8	8	7	7	7	6	6	6	5	69	
Disbenefits to transferred car occupants		-18	-17	-16	-15	-14	-13	-13	-12	-11	-11	-139	
Reduced benefit from shorter charging hours		-9	-8	-8	-7	-7	-7	-6	-6	-6	-5	-69	
Total benefits - willingness to pay - higher sensitivity	169	160	150	142	134	126	119	112	106	100	1319	435	
<i>Cumulative benefits</i>	<i>169</i>	<i>329</i>	<i>479</i>	<i>621</i>	<i>755</i>	<i>881</i>	<i>1001</i>	<i>1113</i>	<i>1219</i>	<i>1319</i>		1.5	

Chapter 15: Public inquiry

15.1 Introduction

- 15.1.1 This chapter examines the issue of whether the Mayor should hold a public inquiry as part of the process of his determination of whether or not to confirm the Scheme Order. It offers TfL's views on the matters the Mayor might wish to consider, though it stresses that the decision is one for the Mayor himself and on which he should take his own legal advice.
- 15.1.2 Under the Greater London Authority Act 1999, as amended, it is the Mayor who decides whether or not to confirm any road user charging order made by TfL or a London Borough. As part of the confirmation process the Mayor may hold an inquiry. This could take a number of formats, though the Mayor has stated that any inquiry into the proposed central London congestion charging scheme would be a public inquiry.
- 15.1.3 A large number of representations asserted that the Mayor should hold a public inquiry into the proposed scheme, for example, so that concerns could be debated in public.
- 15.1.4 To make provision for a possible decision by the Mayor to convene a public inquiry, TfL has identified five suitable venues in or around central London that would be available for an inquiry. TfL has selected venues with suitable accommodation available from May or June 2002 for a period of at least 6 months. This timetable allows for a period of approximately three months within which the Mayor can appoint an inspector (or inspectors) and other appropriate preparations for an inquiry can be made. Once the venue is provisionally booked, this timetable can be extended if necessary.

15.2 Human rights legislation

- 15.2.1 Some cited the European Convention on Human Rights when suggesting that an inquiry should be held. 'Public authorities' must comply with certain provisions of the European Convention on Human Rights. TfL considers that the Mayor is acting as a 'public authority' when considering the Mayor's decision on whether or not to confirm the Scheme Order and whether or not to hold a public inquiry, ie when the Mayor decides whether there is a requirement for a hearing in public before an independent person prior to a decision being reached on the proposed scheme. Conceivably, therefore, the Mayor's decision might need to comply with Article 6 of the Convention – the right to a fair trial. However this right only arises where the decision of a public authority determines 'civil rights and obligations'.
- 15.2.2 TfL does not consider that the Mayor's decision on whether or not to confirm the Scheme Order raises matters connected with the determination of the civil rights or obligations of individuals or organisations. It follows that Article 6 is not relevant to the Mayor's decision.
- 15.2.3 However, even if the opposite view is taken, TfL does not consider that compliance with Article 6 requires a public inquiry to be held. The grounds on which a public inquiry has been suggested – the relevance of the proposed scheme, its functioning, its potential impacts and the nature and scope of exemptions from charges – involve matters of transport planning and political judgment which can properly be decided by the Mayor.
- 15.2.4 The Mayor's decision would be capable of judicial review by the High Court in the normal way, thereby assuring compliance with Article 6 in any event. Accordingly, in TfL's opinion, whether or not to hold a public inquiry then focuses solely on the Mayor's discretion under the Greater London Authority Act 1999.

15.3 The Mayor's decision

15.3.1 TfL urges that the Mayor take legal advice on his overall consideration of the confirmation of the Scheme Order – including the exercise of the Mayor's discretion on the matter and scope of a public inquiry.

15.3.2 Nonetheless, the following issues appear to TfL to be pertinent to the Mayor's decision relating to the holding of a public inquiry:

- the importance of the proposed scheme;
- the novelty of the proposed scheme;
- the impacts of the proposed scheme;
- the extent and adequacy of the information now available about the operation of the proposed scheme;
- the extent and nature of issues in contention;
- the possibility of an inquiry adding new information for the Mayor to consider;
- the value an inquiry could give to the testing and weighing of the conflicting issues and assessing the overall balance of advantage;
- the quality of the public consultation processes on the Scheme Order;
- the reassurance that would be given to objectors by the holding of an inquiry;
- the financial implications of holding an inquiry;
- the impact on timescale of holding an inquiry;
- the scope to adjust the proposed scheme without holding an inquiry;
- the role of the proposed scheme within the Mayor's Transport Strategy; and
- ultimately, whether in the light of the above, the Mayor is able properly to weigh the conflicting issues and properly take into account representations made for, and more particularly against, confirming the Scheme Order without holding an inquiry.

15.3.3 Each of these issues is considered in turn below.

15.4 The importance of the proposed scheme

15.4.1 The proposed scheme would affect the centre of London, the nation's capital and a 'World City'. It would directly affect the road systems of eight boroughs. Some of its impacts would be felt across a wide area of London albeit to reduce traffic levels and congestion. It has implications for several of the key priorities of the Transport Strategy and the costs involved in its implementation and operation are substantial. These are all factors that the Mayor may wish to consider. TfL consider that these could add weight to the case for a public inquiry.

15.5 The novelty of the proposed scheme

15.5.1 The proposed scheme would be the first of its type. Consequently objectors draw attention to uncertainties over its operation and its impacts. However, it is unlikely that additional investigation, whether or not by a public inquiry, will remove those uncertainties. Moreover, the principle of congestion charging has been established in Singapore and the basic technology has been established in tolling schemes on major roads in Toronto and Melbourne. TfL are satisfied that work on modelling of potential scheme impacts, together with the significant period allowed in TfL's timetable for thorough trialling of scheme technology is sufficient for the proposed scheme to proceed.

15.6 The impacts of the proposed scheme

15.6.1 Some objectors envisage harm from the proposals, not only inconvenience or overcrowding on public transport, but risk to emergency services operations or financial loss for individuals and businesses –both in the proposed charging zone and in areas outside the charging zone because of displaced traffic. TfL accepts that the impacts of the proposed scheme, while projected to be generally beneficial, would have some adverse effects on certain individuals and organisations and in some locations. This could be particularly so while the new patterns of traffic and use of public transport in the early weeks as the proposed scheme settle down.

15.6.2 Nevertheless, TfL's own assessment is that certain objectors overstate the seriousness of the potential harm of the proposed scheme. Moreover, if the proposed scheme is introduced, there would be careful monitoring of its impacts – particularly on those considered to be potentially vulnerable to its effects. TfL could adjust the proposed scheme, or the associated traffic management, or the complementary transport measures under its control relatively quickly if the proposed scheme created unexpectedly adverse effects. The Mayor has indicated that he would instruct TfL to do so, if the proposed scheme did not perform as intended. TfL considers that this is an important consideration.

15.7 The extent and adequacy of the information now available about the operation of the proposed scheme

15.7.1 Objectors and TfL vary in their opinions over the adequacy and extent of the information available about the effects of the proposed scheme. Of course, views can differ quite reasonably over the quality or adequacy of information. Others have responded that they are content for TfL to progress the scheme proposals, in some cases with reference to awaiting the results of the impacts monitoring.

15.7.2 A particular concern of some London Boroughs was the absence of specific information on how the Inner Ring Road and other routes would cater for the additional traffic they would carry, and how traffic conditions would change at a local level, particularly in areas just outside the Inner Ring Road. There is concern too about the effects on businesses inside and outside the proposed charging zone, and on parking demands. Objectors contend that without further information and analysis it is premature for the proposed scheme to go ahead, and that a public inquiry might clarify these deficiencies or elicit the information to enable informed decision-making to take place.

15.7.3 TfL accepts that the early traffic modelling in relation to the Inner Ring Road lacked the detailed examination of the traffic signal timings at individual junctions. On the other hand the modelling has now been considerably refined, so that TfL is now confident that the traffic conditions on the Inner Ring Road can be managed effectively.

15.7.4 Traffic model projections of the proposals do not provide the local, street by street, projections that are being sought by some boroughs. However, sufficient information is now available to conclude that the displaced traffic can be handled, even under 'worst case' assumptions. Furthermore, the planned introduction of adaptive traffic signal control on the whole Inner Ring Road and on all major radial routes approaching the Inner Ring

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Road – together with its linking to traffic monitoring systems under the 'dynamic boundary management' arrangements – will enable variations in traffic demands to be managed.

15.7.5 Furthermore, the detailed impact in terms of traffic flow changes on individual roads will depend on the type and extent of other traffic management measures that the boroughs may wish to introduce on their roads. These are subject to the design and consultation procedures of individual boroughs and until the full extent of these are known it would be impossible to accurately predict localised traffic changes at the level some boroughs have requested.

15.7.6 The effects on businesses and on parking provision are simply incapable of precise prediction, and TfL does not consider that further technical modelling or research in advance of implementation, is likely to provide, or indeed capable of providing, the degree of certainty of answer and reassurance which some objectors seek. Further information continues to become available as a result of ongoing work by TfL and its consultants and through discussions with boroughs.

15.7.7 In TfL's view the information now available is sufficient for a decision to be made by the Mayor to confirm the Scheme Order without the need for further studies or the holding of a public inquiry, given the detailed monitoring programme planned and the ability, if necessary, to vary the proposed scheme once in operation. The ALG, despite being critical of certain aspects of the proposed scheme, have stated that it would seem unwise to expend additional effort on a more detailed level of modelling which sought to predict the impacts at a smaller scale, because there is no other congestion charging scheme of this type or on this scale, which can be used to calibrate the results. TfL agrees with this approach.

15.8 The extent and nature of issues in contention

15.8.1 Among the principal issues in contention are:

- the need and timescale for improvements in public transport;
- concerns about possible increased traffic congestion near the proposed charging zone boundary;
- suggested changes to discounts and exemptions;
- adjustments to the proposed charging zone boundary;
- hours of operation and level of charge;
- concerns about the adequacy of the Scheme Order consultation;
- potential adverse impacts on businesses and residents; and
- the concern that the charge is another 'tax' on motorists.

15.8.2 None of these raise factual issues, but rather are matters of judgement and opinion, upon which different views can reasonably be held. They could occupy a public inquiry for many months without any likelihood that the outcome would be a definitive resolution of the disputed matters. Congestion charging has been an important element of Government policy for several years and no better means of tackling traffic congestion in London has been so far identified. A start has to be made somewhere – inevitably with a scheme the results of which cannot be expected to be entirely predictable.

15.9 The possibility of an inquiry adding new information for the Mayor to consider

- 15.9.1 To explore the impact of the proposed scheme in greater detail it would be necessary to await the development in full of individual traffic management measures and new studies and surveys being carried out to assess the impact of these measures on local traffic flows. Even then, traffic modelling is an imprecise science and there is a limit to the degree to which it is possible for anyone to predict with any certainty what the localised consequences of the proposed scheme would be.
- 15.9.2 Undoubtedly, subjecting the Scheme Order to a public inquiry would elicit some further information, just as further information and lessening of uncertainty is already being achieved by the modelling and traffic management studies that are continuing and which will continue up to (and beyond) the introduction of the proposed scheme in any event.
- 15.9.3 Taking a wider view, it is notable that few of the representations have offered specific information on the general design of the proposals, or on its impacts or indeed on their own proposals in some cases. TfL questions whether the information coming forward as a result of a public inquiry, including any cross-examination of witnesses, would contribute to the traffic consequences of the proposed scheme being more accurately assessed to any significant extent.

15.10 The value an inquiry could give to the testing and weighing of the conflicting issues and assessing the overall balance of advantage

- 15.10.1 A public inquiry would provide a forum for the independent testing and weighing of TfL's conclusions. Experts could be engaged to provide assessments of the analyses provided by TfL and its consultants. It might also mean that other proposals were brought forward for examination, although any alternatives would be constrained by the broad framework of the Mayor's Transport Strategy, which has already been adopted after a wide-ranging public consultation exercise.
- 15.10.2 How far any independent testing and weighing of TfL's conclusions might result in different recommendations to the Mayor is debatable, in the light of the type of new information that might conceivably be presented to an inquiry and the constraints of the Mayor's Transport Strategy. It is, however, possible that the recommendation of an inquiry might be to abandon the proposals altogether or to make significant modifications to the proposed Scheme Order, or to delay them. Although any such recommendation would be subject to policy consideration by the Mayor. The Mayor may consider it useful to a report and recommendation, independent to that of TfL, reached by an Inspector following a public inquiry.
- 15.10.3 Those appointed to hold the inquiry would be able to recommend what they considered was appropriate in the light of the available evidence. On the other hand, TfL is already proposing various modifications to the Scheme Order. TfL's view is that the proposed scheme is the best presently capable of being devised for London, and is likely to be endorsed if submitted to public inquiry. The time to consider, and bring forward further modifications, would be after the proposed scheme has been introduced and monitored for a reasonable period of time.

15.11 The quality of the public consultation processes on the Scheme Order

- 15.11.1 Details of the extent of the consultations on the Scheme Order are set out in Chapter 3 to this report. In TfL's view, this has given full opportunity for all interested parties to make informed representations on the proposed scheme, which TfL has then considered. TfL considers it highly improbable that anyone would wish to take part in a public inquiry who

The Greater London (Central Zone) Congestion Charging Order 2001: Report to the Mayor, February 2002 has not already responded, or at least had ample opportunity to respond, to the previous consultations. Nor does TfL consider that any substantive issues would be raised at an inquiry that have not already been raised and considered.

15.12 The reassurance that would be given to objectors by the holding of an inquiry

15.12.1 A decision to hold a public inquiry would undoubtedly reassure objectors that they would receive a fair hearing before an independent person. Some have questioned the independence of the Mayor, given his position as Chair of TfL and the status of the proposed scheme within his Transport Strategy. Without in any way underrating the importance of the appearance of fairness, TfL considers that the Mayor, properly advised, is capable of reaching his own, fair decision in the matter; and that the outcome should not be regarded as predetermined. The Mayor is capable of assessing the cogency and the validity, or otherwise, of the arguments against the proposed scheme, both as set out in the actual representations and objections and as summarised in this report, as well as evaluating the strength or weakness of TfL's response. The Mayor has already indicated his willingness to adjust significantly the proposals in the light of responses received during the several past periods of consultation, and to delay the decision-making process so that the views of stakeholders and the public on possible modifications can be heard.

15.13 The financial and programme implications of holding an inquiry

15.13.1 Cost and delay are inherent in a public inquiry and, to that extent, if other factors indicate that an inquiry should be held, these alone may not be considered adequate reasons for a decision not to hold an inquiry.

15.13.2 While any inquiry could have a limited set of objectives, it is likely that it would range over much of the proposed scheme and therefore the inquiry itself could last several months as a minimum. Preparation for the inquiry and the production of an Inquiry Report and its consideration by the Mayor would add very considerably to the whole process – which would be likely to defer the date for final decision-making in total by two years. There would also be considerable direct financial costs in holding a public inquiry, but in the context of the overall expenditure proposed, it is not considered that much weight can attach to these costs.

15.13.3 Since exercising the call options would need to be deferred pending the outcome of a public inquiry – as to go ahead with them would inevitably give the appearance that the outcome of the inquiry had been pre-judged – TfL concludes that the holding of a public inquiry would postpone the 'go live' date from mid-February 2003 to some date in 2005 at the earliest. In which case the nature of the delay is such that it would be necessary to renegotiate or re-tender the contracts following a review of the technology available to support the proposed scheme.

15.13.4 A public inquiry would also have substantial financial implications for the implementation of the proposals. If the proposed scheme proceeds without a public inquiry, contracts involving substantial sums of money would be entered into following confirmation of the Scheme Order. This expenditure would be wasted if, following implementation, the proposed scheme had to be abandoned because it proved to be fundamentally flawed for reasons that might have emerged at a public inquiry.

15.13.5 However, if a public inquiry were held and its result was a recommendation that the proposed scheme proceed and the Mayor agreed, then the congestion benefits, and revenues, from charging would have been unnecessarily deferred and, as a result of suspension of the proposed scheme, the costs of implementing the proposed scheme would be very substantially increased.

15.13.6 If, following a public inquiry the Mayor decided not to proceed, all the costs invested to

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date would be nugatory. The full extent of the costs would depend on the date on which a decision was made to abort the proposed scheme.

15.14 The scope to adjust the proposed scheme without an inquiry

15.14.1 Unlike many of TfL's infrastructure projects, there is substantial scope to adjust the operation of the proposed scheme in the short term. With the Mayor's approval, the proposed scheme could be modified, suspended or revoked. Some aspects of the Scheme Order could be modified relatively simply – for example the charges could probably be lowered after a relatively straightforward consultation if it was found that drivers were responding with a very high sensitivity and public transport operations were being threatened by an excessive number of additional passengers. More fundamental adjustments to part or the whole of the proposed scheme could be made over the longer term, especially if the Transport Strategy were modified. There is nothing in the proposed scheme that cannot be adjusted and, ultimately, the scheme is reversible.

15.15 The role of the proposed scheme within the Mayor's Transport Strategy

15.15.1 The proposed scheme is being developed in response to a specific proposal and its associated annex in the Mayor's Transport Strategy. The Strategy, including detailed proposals for a central London congestion charging scheme, was itself the subject of extensive public consultation. If the Mayor is satisfied with the processes that led to the development of his Transport Strategy, then the Mayor might consider that this reduces the need for a public inquiry. TfL has not sought to prevent the issue of principle being raised in the public consultation.

15.16 Ultimately, whether in the light of the above, the Mayor is able properly to weigh the conflicting issues and properly take into account representations made for, and more particularly against, confirming the Scheme Order without holding an inquiry

15.16.1 This seems to TfL to be the key issue. It must be a matter for the Mayor himself to consider.

How far does the Mayor feel able to assess the issues that have been raised, particularly those issues which consultees have argued should be assessed further in a public inquiry?

15.16.2 Even if the Mayor felt unable to assess all the information before him, there are other ways of securing information on particular matters, ranging from a simple request to TfL for further analysis, to perhaps further public consultation on specific matters.

15.16.3 TfL's view is that the Mayor is able – on consideration of this report – to address properly all the relevant issues, including what are admittedly many, strongly-felt objections to the confirmation of the Scheme Order, without holding a public inquiry. But, as previously indicated, this is a matter which the Mayor will wish to consider in the light of legal advice.

Chapter 16: recommendations

- 16.1 The Mayor has already been provided with copies of all representations and objections received by TfL since the Scheme Order was made in July 2001. The Mayor now has to decide whether to confirm the Scheme Order, with or without modifications.
- 16.2 In the light of the latest information available to TfL, including the responses to the public consultation that has taken place since the Scheme Order was made in July 2001, **TfL recommends that the Mayor should:**
- consider the responses to the public consultation, together with the considerations of TfL, in particular by reference to annexes D and G of this report;
 - consider the whole of this report, which is intended to supplement other materials already available to him relating to the congestion charging proposal;
 - consider whether any further changes, including those recommended in this report by TfL, are appropriate to the Scheme Order if he were minded to confirm it. A copy of the text of the Scheme Order containing TfL's recommended modifications is at Annex I to this report;
 - consider whether further consultation or the holding of a public inquiry is necessary or appropriate prior to his decision whether or not to confirm the Scheme Order;
 - if he considers that no further consultation is necessary or appropriate and that the holding of a public inquiry is not necessary or appropriate, to confirm the Scheme Order subject to the modifications recommended in the report by TfL (including the six modified deposited plans) and any further modifications which he regards as appropriate; and
 - if the Mayor decides to confirm the Scheme Order, formally apply to the Secretary of State for Transport Local Government and the Regions for approval of the 10 Year General Plan for applying the net proceeds of the scheme.