

Transport for London

**TLRN and Central London Congestion Charging
Scheme Consultation with the public and
stakeholders**

**TfL's Report to the Mayor on the
Congestion Charging and Traffic
Enforcement Penalty Charge Notice
Consultation**

December 2017



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Executive Summary

- i. The Transport for London Road Network (TLRN) is a network of strategic roads in London which carry 30 per cent of London's traffic, but which make up only five per cent of the city's roads. On average, each of the TLRN routes carries 50,000 vehicles per day. This is two and a half times the volume of traffic carried on key A roads managed by London's Local Authorities.
- ii. The Congestion Charge zone (CCZ) is an area of central London where it is necessary to pay the Congestion Charge (CC) in order to drive a vehicle from 07:00 – 18:00, Monday to Friday.
- iii. TfL's priority in managing the TLRN is to keep traffic moving. To this end, restrictions on the TLRN are designed to discourage stopping or parking where it would be dangerous or disruptive to other road users.
- iv. The Mayor's Transport Strategy (MTS) provides that the Mayor will keep the Congestion Charging scheme under review and make variations to ensure the scheme remains effective in reducing traffic and congestion in central London and reflects best practice and other developments in relation to its operation and discounts and exemptions. A draft revision of the MTS has been prepared and has been subject to public consultation. Proposal 18 of the draft revised MTS sets out that the Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.
- v. Contraventions on the TLRN have a negative impact on traffic congestion and traffic flow. This is because vehicles parked on the TLRN, driving in bus lanes or entering yellow box junctions disrupt the flow of traffic, slow down other road users and lead to congested roads. It has been estimated that the cost of congestion on the TLRN alone is annually worth almost £2.2 billion¹. Vehicles entering the CCZ without paying also add to the volume of traffic on the roads, causing more congestion and slower journey times.
- vi. In April 2017 TfL conducted a review of TLRN and Congestion Charge contraventions committed between 2011/12 and 2016/17. This review focused on the volume of Penalty Charge Notices (PCNs) issued to drivers, the number of TLRN and CCZ repeat offenders, and options available to address the number of contraventions committed on London's roads.

¹ [Total vehicle delay for London 2014-15](http://content.tfl.gov.uk/total-vehicle-delay-for-london-2014-15.pdf) <http://content.tfl.gov.uk/total-vehicle-delay-for-london-2014-15.pdf>

- vii. This review found that the volume of PCNs raised for TLRN and Congestion Charge contraventions in has been rising since 2011. It also found that the rate of repeat offending has been growing during the same period. In 2011 almost 60 percent of CC PCNs and 34 percent of TLRN PCNs were issued to repeat offenders. By 2016 this number increased to 64 per cent for the CC and 38 percent for TLRN PCNs. The rise in contraventions on the TLRN and in the CCZ is a factor that impacts on congestion, traffic speed and traffic flows in London.
- viii. Issuing PCNs is an important tool that is utilized by TfL to help manage driver behaviour on London's roads to deter them from committing contraventions. However the effectiveness of this deterrent is determined by whether or not the value of the penalty outweighs the perceived benefit of committing an offence.
- ix. As contraventions have been increasing over a number of years it is surmised that the deterrent effect of a PCN has been declining. This is demonstrated by the increasing rate of PCNs issued by TfL and the rise in repeat offending.
- x. Following this review TfL consulted with the public and stakeholders on the following proposed change to the scheme:
 - Increase the TLRN and CC PCN level from £130 to £160 in order to reinforce the deterrent effect of a PCN.
- xi. TfL consulted with the public and stakeholders on the proposed TLRN and CC PCN increase. The consultation ran from 4 September 2017 until 10 November 2017.
- xii. The consultation was publicised via a press release, adverts in pan-London newspapers and trade press, via the TfL website, twitter and by emailing over 517,000 TfL customers. The proposed CC variation was also published as a Legal Notice in the London Gazette.
- xiii. TfL contacted a range of stakeholder organisations to encourage them to respond to the consultation including London boroughs, transport and environment representative groups, motoring organisations and organisations representing the voluntary and community sectors, among others.
- xiv. This report sets out TfL's analysis of the public and stakeholder views received to the consultation and include TfL's comments and recommendations.

Consultation responses

- xv. Consultation responses were received from 7,411² members of the public and businesses, including 21 responses from stakeholder organisations. The bulk of responses (91%) were received online via the consultation portal. 4,920 respondents provided a postcode to identify the location of the respondent. The majority (74%) of respondents, who shared this information, were from postcodes within London Boroughs.

² 4 responses were omitted as they were duplicates of responses previously received.

- xvi. TfL asked the following key questions as part of the consultation questionnaire:
- Do you believe that there are other, alternative options to increase compliance with the red route network (TLRN) and congestion charging zone?; and
 - Would the increase in the value of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users?
- xvii. TfL also asked for respondents to share any other concerns or comments about the proposed PCN increases
- xviii. Of the public responses³:
- 7,452 statements were made regarding alternative options (see section 4);
 - 6,251 statements were made by respondents concerned that the PCN increase would cause hardship (see section 4); and
 - Although we did not ask a direct question regarding support or opposition to the proposed increase, 13,457 statements were made across all consultation answers expressing a position (see section 4). These responses ranged across a number of views encompassing support for the proposal, support if the increase applies only to certain vehicle types / groups, to strong opposition to the proposal.
- xix. Of the 21 stakeholder responses:
- Six proposed alternative means to improve compliance on the TLRN and in the CCZ (see section 5);
 - Six supported or strongly supported the proposal to increase the PCN level on the TLRN and for CC (see section 5);
 - Seven were opposed to TfL's proposal (see section 5). Of this half were attributed to organisations or businesses within the freight industry; and
 - One respondent raised no comments, while one, London Councils, flagged concerns that the proposal would lead to inconsistencies between borough road and TLRN PCNs.

³ Respondents were free to write as much or as little as they felt appropriate in response to each of the open questions. Some respondents raised multiple points (or 'statements' which were identified)

TfL response to issues raised

- xx. TfL considers that the contraventions on the TLRN and evasion of the Congestion Charge in central London, has a significant impact on congestion and traffic flow on London's roads. It has been estimated that the cost of congestion on the TLRN alone is annually worth almost £2.2 billion. Vehicles entering the CCZ without paying also add to the volume of traffic on the roads, causing more congestion and slower journey times
- xxi. The volume of TLRN and CC PCNs has been rising since 2011, along with the PCN repeat offending rate. TfL has concluded that reinforcing the deterrent effect of receiving a PCN, by increasing the PCN level, is a proportionate response to this issue. By doing so TfL aims to help address the impact that these contraventions have on London's roads.

TfL's conclusions and recommendations

- xxii. Having considered the responses to the consultation from the public, businesses, and stakeholders, TfL recommends that the Mayor:
- Confirms the Variation Order made by TfL which will increase the PCN level from £130 to £160 for non-payment of the congestion charge;
 - Approves the increase to the PCN level from £130 to £160 for contraventions of the rules of the TLRN;
 - Determines how TfL shall publish the increased charges to the TLRN PCN level; and
 - Writes to the Secretary of State for Transport to notify him of the proposed increase to the TLRN PCN level.
- xxiii. Should the Mayor decide to confirm the Variation Order, the increased PCN level for non-payment of the congestion charge will apply from 2 January 2018.
- xxiv. If the Secretary of State raises no objections to the TLRN PCN proposal, TfL proposes that the new PCN level for TLRN contraventions is published for 3 weeks prior to the change taking effect. This is subject to the Mayor determining how TfL should publish the increase as per the Traffic Management Act 2004.

1 Introduction

1.1. Overview and purpose of report

- 1.1.1. On behalf of the Mayor, Transport for London (TfL) made and consulted with the public and stakeholders on:
- A Variation Order to modify the Congestion Charging Scheme to increase the PCN level from £130 to £160; and
 - Increasing the PCN level for bus lane, moving traffic and parking regulation contraventions committed on the TLRN from £130 to £160.
- 1.1.2. The consultation ran from 4 September 2017 to 10 November 2017.
- 1.1.3. This report presents TfL's analysis of the issues raised in the consultation. The remainder of this chapter provides the background to the consultation, including the legislative process and a summary of the proposals. Chapter 2 describes the consultation process. Chapter 3 provides an analysis of consultation respondents and the channels used to respond to the consultation. Chapters 4 and 5 provide an analysis of the responses to the consultation from the public and stakeholders, respectively, including the number responding to the consultation and the key issues raised in consultation responses. Chapter 6 provides TfL's response to the key issues raised by theme. Finally, Chapter 7 sets out TfL's conclusions and recommendations to the Mayor. The Mayor is advised, when considering TfL's summaries, responses and recommendations, to have regard to the consultation responses themselves, all of which have been copied to him.
- 1.1.4. If the Mayor confirms the Variation Order, the change to the Scheme Order would commence on 2 January 2017 for the CC PCN increase.
- 1.1.5. If the Mayor approves the increased TLRN PCN level, the Mayor must notify the Secretary of State of the new PCN level. The Secretary of State then has 28 days to object to the increased level on the grounds that it is excessive. If he does so those levels of charges shall not come into force unless and until the objection has been withdrawn. The Secretary of State may also make regulations specifying a lower PCN level than the one proposed.

1.2. The legislative process

- 1.2.1. The GLA Act gives TfL the power to make road user charging schemes in Greater London. The Act stipulates that such schemes must be contained in an order which is subject to confirmation by the Mayor. The Greater London (Central Zone) Congestion Charging Order 2004 (the Scheme Order) created the central London Congestion Charging scheme.
- 1.2.2. A charging scheme (or a variation to a charging scheme) can only be made if it directly or indirectly facilitates policies or proposals in the MTS and is in conformity with the MTS (under paragraphs 3 and 5 of Schedule 23).
- 1.2.3. Paragraph 38 of Schedule 23 of the Act gives TfL a power to revoke or vary a charging scheme. The power is exercisable in the same manner and subject to the same limitations and conditions as the making of a Scheme Order. Various amendments to the Congestion Charging Scheme Order have been made since it was first confirmed in February 2002. Such amendments are made by way of variation orders. Under Schedule 23, any variation order must be made by TfL and may be confirmed with or without modifications by the Mayor.
- 1.2.4. The Road User Charging (Charges and Penalty Charges) (London) Regulations 2001/2285 provide that penalty charges which are imposed by a charging scheme shall be specified in the scheme. The current penalty charge level is set out in paragraph 12 of the Scheme Order.
- 1.2.5. TfL issues PCNs for contraventions committed on the TLRN pursuant to the following Acts:
 - Bus lane contraventions: issued under the London Local Authorities Act 1996;
 - Moving traffic contraventions: issued under the London Local Authorities and Transport for London Act 2003; and
 - Parking regulation contraventions: issued under the Traffic Management Act 2004 ('TMA').
- 1.2.6. The procedure which applies to varying the level of a PCN issued for contravening the rules of the TLRN is set out in schedule 9 of the Traffic Management Act 2004. TfL is required to set the level of PCNs and to consult London local authorities before doing so. After consultation, TfL must submit the proposed level of charges to the Mayor. The Mayor on making a decision to approve the new level of charge must notify the Secretary of State. The Secretary of State then has 28 days to object to the proposal. TfL is required to publish the levels in such manner as the Mayor of London may determine.

1.3. The Variation Order

- 1.3.1. TfL made the Greater London (Central Zone) Congestion Charging (Variation) Order 2017 on 16 August 2017. The Variation Order is attached to this report at Annex A. It is for the Mayor to decide whether or not to confirm the Variation Order, as made by TfL, with or without modifications.
- 1.3.2. The Variation Order proposed one amendment to the Congestion Charging Scheme Order, namely an increase in the penalty charge from £130 to £160.
- 1.3.3. The Variation Order did not propose any other changes to the operation of the Congestion Charging scheme, as specified in the Congestion Charging Scheme Order.

1.4. Summary of the proposed changes

- 1.4.1. This section provides a summary of the changes to the TLRN PCN level and Congestion Charging scheme. It also includes the background to the change and a summary of the impacts of each proposal.

1.5. Background

Congestion Charge scheme

- 1.5.1. The CCZ is an area of central London where it is necessary to pay the Congestion Charge in order to drive a vehicle from 07:00 – 18:00, Monday to Friday.
- 1.5.2. When TfL detects a vehicle within the zone which does not pay the charge by midnight the following charging day, and which is not exempt or does not have a valid discount in place, then a PCN will be issued to the registered keeper of that vehicle. The current level of a PCN is £130. A 50 per cent discount applies if the PCN is paid within 14 days reducing the cost to £65. If the PCN is not paid or challenged within 28 days, the cost increases to £195.
- 1.5.3. Proposal 129 of the Mayor's Transport Strategy (MTS) provides that the Mayor will keep the Congestion Charging scheme under review and make variations to ensure the scheme remains effective in reducing traffic and congestion in central London and reflects best practice and other developments in relation to its operation and discounts and exemptions. A draft revision of the MTS has been prepared and is currently subject to public consultation. Proposal 18 of the draft revised MTS sets out that the Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.

1.5.4. Since the introduction of the Congestion Charge scheme, TfL has varied the PCN level on three occasions. In 2004 the full level of the PCN was increased to £100 from £80. In 2007 it was increased to £120, and in 2013 it was increased to £130.

Transport for London Road Network (TLRN)

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

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

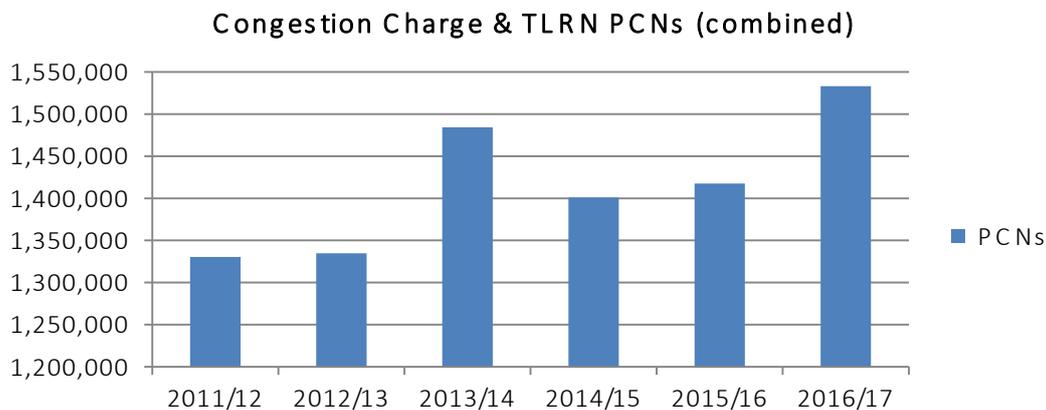
1.5.7. If TfL detects a vehicle committing a contravention on the TLRN, then a PCN will be issued to the registered keeper of the vehicle.

1.5.8. The current level for a PCN issued for a contravention on the TLRN is the same as for failing to pay the Congestion Charge. The last time that the TLRN PCN level was April 2011. At this time the PCN was increased from £120 to £130.

Contravention volumes

1.5.9. Over the last six years there have been an increasing number of roads users contravening the rules of the TLRN and not paying the Congestion Charge. It has therefore been necessary for TfL to raise an increasing number of PCNs. This is shown in the chart below:

Chart 1: PCNs raised by TfL for Congestion Charge and TLRN contraventions



Congestion Charge Repeat Offenders

1.5.10. Drivers who receive more than one PCN per year are termed 'repeat offenders'. Taking all of the Congestion Charge PCNs issued in 2011 as a whole, almost 60 per cent of PCNs were issued to repeat offenders. By 2016 this number increased to 64 per cent.

Table 1: Congestion Charge repeat offenders

Year	% of all PCNs issued to repeat offenders
2011	59.9%
2012	59.7%
2013	61.7%
2014	61.9%
2015	62.1%
2016	64.1%

TLRN Repeat Offenders

1.5.11. The same repeat offending trend has been seen for TLRN PCNs. Almost 34 per cent of the PCNs issued in 2011 for contraventions on the TLRN were issued to repeat offenders. By 2016 this had increased to 38 per cent.

Table 2: TLRN repeat offenders

Year	% of all PCNs issued to repeat offenders
2011	33.6%
2012	35.7%
2013	36.6%
2014	35.3%
2015	36.5%
2016	38.3%

1.6. Proposal

1.6.1. In undertaking its impact assessment, TfL reached the following conclusions regarding PCNs issued for TLRN and CC contraventions:

- The prospect of receiving a PCN is not as significant a deterrent against poor driving behaviour as it has been in the past. This is demonstrated by the year on year increases in the number of recorded contraventions.
- Inflation over the last few years, together with the fact that the cost of a PCN has stayed the same, may have reduced the deterrent effect of receiving a PCN. This is seen as a contributing factor to the number of contraventions committed each year and the subsequent volume of PCNs issued by TfL.
- There is a significant and growing minority of road users who persist either in attempting to avoid paying the Congestion Charge, or using the TLRN in a way which is dangerous or disruptive to others. This group of repeat offenders is increasingly having a direct impact on congestion and traffic flows on London's road network.

1.6.2. TfL proposed to increase the penalty charge for non-payment of the Congestion Charge from £130 to £160. From 2 January 2017, the penalty charge would be £160, reduced to £80 if paid within 14 days or increased to £240 if not paid within 28 days.

1.6.3. TfL proposed to increase the PCN level for bus lane, moving traffic and parking regulation contraventions committed on the TLRN from £130 to £160. From 5 February 2017, the penalty charge would be £160, reduced to £80 if paid within 14 days or increased to £240 if not paid within 28 days.

1.7. Impact assessment of proposed changes

1.7.1. TfL's impact assessment has identified, where possible, quantifiable data and the analysis of impacts is based on current available information. The identification of the impacts has, however, more broadly relied on qualitative data and the exercise of professional judgement to determine the relative significance and severity or scale of the impacts.

Economic

1.7.2. If no changes were made it is expected that contraventions on the TLRN and in the CCZ will continue to increase, alongside further increases to the repeat offender rates. Such an increase would subsequently have a detrimental impact on traffic volumes, traffic speed and congestion. As such the cost of congestion on London's roads, and the subsequent impact on businesses, commuters and the freight industry, would continue to increase.

- 1.7.3. However, the increased PCN level would deter road users from committing traffic contraventions on the TLRN and encourage those entering the CCZ to pay the charge or to not drive into the zone. As such this is anticipated to have a positive impact on some of the causes of congestion and will be a factor in TfL's overall strategy to reduce congestion on London's roads. A reduction in congestion will lower the cost of congestion experienced by London's businesses and the freight industry.
- 1.7.4. This change is not considered to have an impact on the economy or businesses that comply with the rules of the TLRN or those that already comply with the Congestion Charge scheme.
- 1.7.5. The proposed increase in both the TLRN and Congestion Charge penalty charge would result in c. £80m extra net income over the TfL Business Plan period 2016/17 to 2021/22.

General equality duty

- 1.7.6. An equalities impact assessment was undertaken and found that there is no evidence that an increase in the PCN level for the Congestion Charge or TLRN contraventions would disproportionately affect any of the equality target groups.
- 1.7.7. The equalities impact assessment was reviewed by TfL's Independent Disability Advisory Group (IDAG) to ensure impartiality when considering any potential equality impacts as a result of the proposed changes.

Health

- 1.7.8. In assessing the health impact of the proposed changes, it was concluded that they were unlikely to have a significant effect on health (neither positive nor negative). For this reason it was determined that there was no need to carry out a full Health Impact Assessment upon them.

Climate change

- 1.7.9. In assessing the climate change impact of the proposed changes, it was concluded that they were unlikely to have a significant effect on climate change (neither positive nor negative).

2 The consultation process

2.1. Introduction

- 2.1.1. This chapter provides an overview of the consultation, as well as a description of the actions and communication methods employed to promote the consultation itself and elicit views from the public and stakeholders about the proposals.
- 2.1.2. The primary objective of the consultation process is to understand the views of the public and stakeholders concerning proposed changes to the TLRN PCN level and Congestion Charging scheme. This report sets out the feedback from the consultation process which aims to inform the Mayor's decision making process.
- 2.1.3. TfL has a statutory duty to consult on any variations to the Congestion Charging scheme. The previous Mayor issued statutory guidance to TfL entitled "Guidance from the Mayor of London on charging schemes pursuant to schedule 23 of the Greater London Authority Act 1999". TfL must have regard to this Guidance when discharging its charging scheme functions. In accordance with the Guidance, TfL has treated the change to the Scheme Order to give effect to the increased penalty charge level as a major variation.
- 2.1.4. Schedule 9 of the Traffic Management Act 2004 details the procedure which applies to varying the level of a PCN issued for contravening the rules of the TLRN.
- 2.1.5. The consultation sought views on the proposed change to the TLRN PCN level and Congestion Charging scheme as set out in the Variation Order.

2.2. Consultation dates

- 2.2.1. The consultation commenced on 4 September 2017 and closed on 10 November 2017.

2.3. Publicising the consultation

- 2.3.1. A marketing campaign was developed to raise awareness of the consultation and encourage customers to have their say. Adverts were featured in a variety of London media titles including:
 - Pan-London press (Evening Standard, Metro, City AM);
 - Specialist trade press (Truck and Driver, Bus and Coach buyer, Business Car, What Van and Fleet World); and
 - Digital display advertising to promote the consultation and encourage readers to complete the questionnaire.

- 2.3.2. Notice of the making of the Congestion Charge Variation Order was also published in the London Gazette.
- 2.3.3. The consultation was further promoted through effective media liaison with news and trade titles. TfL issued a press release to these bodies on 1 September 2017 informing them of the upcoming consultation.
- 2.3.4. The press release was issued to:
- all London media (pan-London and local press)
 - Social Media – Tweet on @tflofficial with links to the consultation page
- 2.3.5. The press release was covered by over twenty outlets, including the Evening Standard, BBC Online, Londonist, Daily Mail Online and local print titles including Ealing and Acton Gazette and Local Transport Today. The story also received broadcast coverage from LBC and BBC Radio London's Breakfast show.

2.4. Stakeholder communications and meetings

- 2.4.1. The public consultation was supplemented by engagement with stakeholders. This was to ensure that stakeholders were well briefed about the potential timetable for the proposed changes, to understand their issues and concerns, and to encourage participation in the consultation
- 2.4.2. TfL identified key stakeholders including the 33 London boroughs (including the City of London Corporation), London Councils, the Metropolitan Police Authority, the London Fire and Emergency Planning Authority, business representative organisations, freight and haulage representative organisations, transport and environment representative organisations, government departments and non-departmental bodies, trade and professional associations and London TravelWatch, London Assembly members and organisations representing the local community and voluntary sectors.
- 2.4.3. On the consultation launch date, TfL wrote to stakeholders explaining the proposed changes and providing a link to the consultation portal (see section 2.7).
- 2.4.4. Ahead of the consultation, TfL also met with London Councils and the DfT on several occasions to brief them on the proposals.

2.5. Targeted communications to TfL customers

- 2.5.1. On 12 September 2017, TfL sent an email to private and commercial drivers using our customer relationship management system. In total, over 517,000 customers were emailed.

2.5.2. Customers were requested to complete the online questionnaire to provide their views and were directed to TfL's consultation portal.

2.6. TfL website

2.6.1. TfL raised awareness of the consultation by placing banners in a number of prime areas of its website, including the TfL website Driving landing page, Congestion Charge landing page and promotional banners on the TfL.gov.uk landing page

The banners offered a link through to the consultation portal and an opportunity for the public to provide their views.

2.7. The consultation portal

2.7.1. The TfL online consultation portal (www.tfl.gov.uk/penalty-charge) hosted all the relevant information relating to the consultation.

2.7.2. The consultation portal provided a summary of the proposed changes. The portal also included a link to the following documents which provided more detailed information on the proposals:

- Impact assessment; and
- Variation Order

2.7.3. Respondents were requested to complete and submit an online questionnaire to provide their feedback about the proposals. It included a number of open and closed questions providing the opportunity for respondents to indicate their views about each of the proposals as well as give additional comments and feedback.

3 Summary of respondent information

3.1. Number of responses received

3.1.1. In total, 7,411 responses were received to the consultation. Table 3.1 provides a breakdown of public and stakeholder responses.

Table 3.1: Total number of stakeholder and public responses received

Audience type	Number of responses	Percentage
Stakeholders	21	0.3%
Public	7,390	99.7%
<i>Total</i>	<i>7,411</i>	<i>100%</i>

3.2. Channels used to respond to the consultation

3.2.1. TfL offered a number of ways for respondents to provide their responses to the consultation.

- Online – through the consultation portal
- Email – comments emailed directly to TfL
- Letter – a small number of stakeholders wrote directly to TfL

Table 3.2: Consultation responses by response method

Response method	Number of responses	Percentage
Email or letter	658	9%
Online	6,753	91%
<i>Total</i>	<i>7,411</i>	<i>100%</i>

3.3. Communication channel

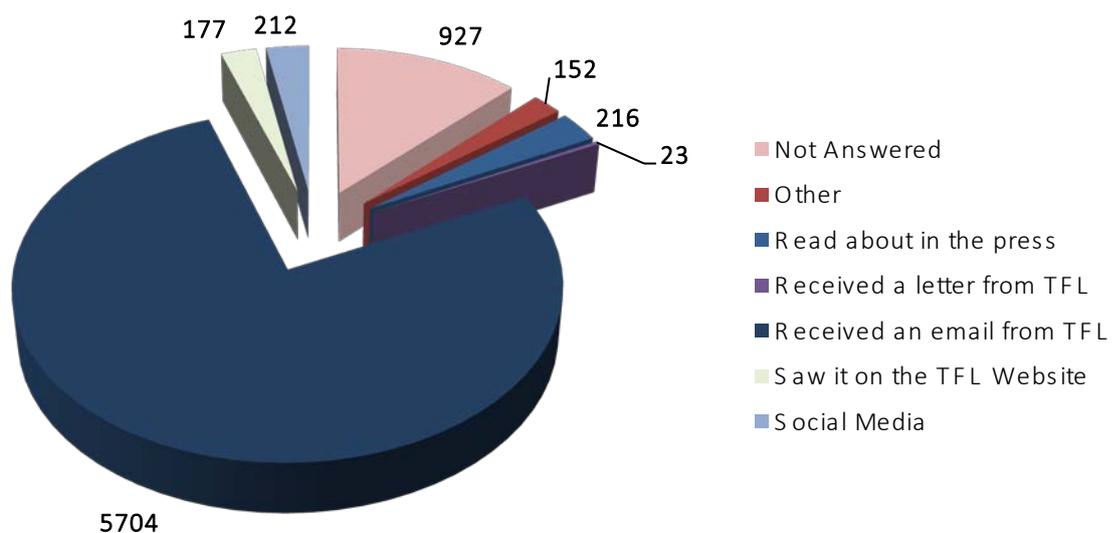
3.3.1. Respondents were asked to provide information about how they had found out about this consultation.

Table 3.4: Respondents by communication channel

Channel	Number of responses	Percentage
Received an email from TfL	5,704	76.9%
Received a letter from TfL	23	0.3%
Read about it in the press	216	2.9%
Saw it on the TfL website	177	2.4%
Social Media	212	2.9%
Not answered	927	12.5%
Other	152	2.1%
Total	7,411	100%

Figure 1: Responses to PCN consultation

Question 8 - How did you find out about this consultation?



3.4. Quality of consultation

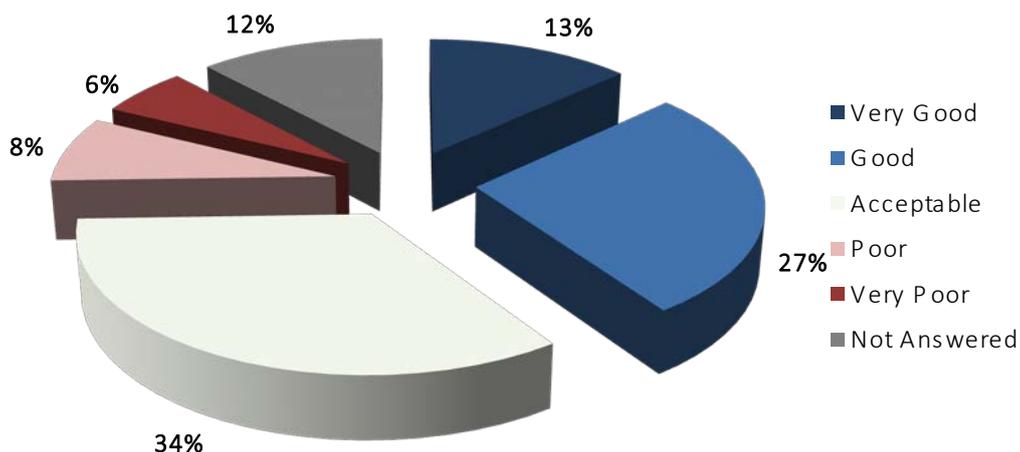
3.4.1. Respondents were asked to indicate what they thought of the quality of the consultation. For example, the quality of the information TfL provided, any printed material they received, any maps or plans, the website and questionnaire etc.

Table 3.5: Respondents by consultation quality feedback

Consultation quality	Number of responses	Percentage
Very good	977	13.2%
Good	2,016	27.2%
Acceptable	2,525	34.1%
Poor	579	7.8%
Very Poor	432	5.8%
Not answered	882	11.9%
Total	7,411	100%

Figure 2: Quality of PCN consultation

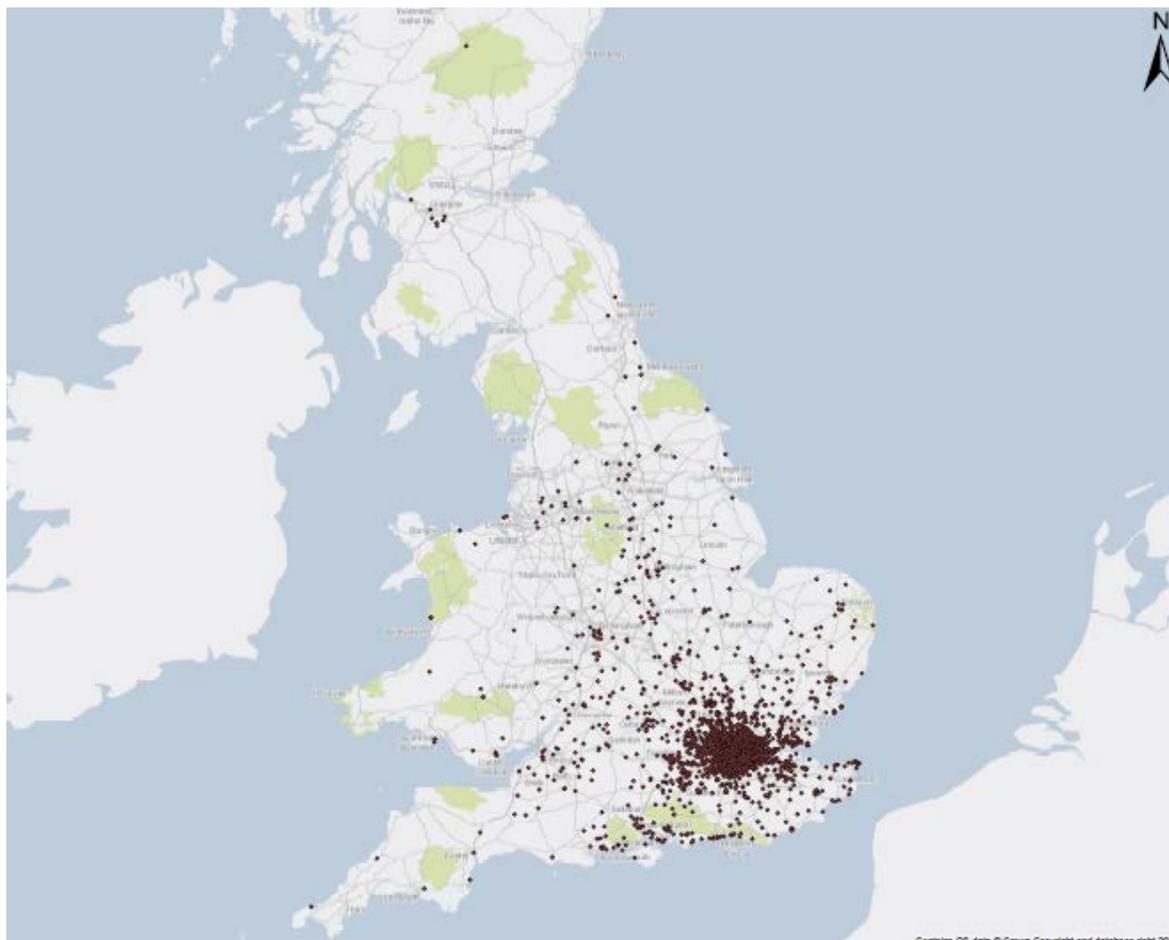
Question 9 - What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?



3.5. Location of respondents

3.5.1. A total of 4,920 respondents provided a postcode, of which all but 59 could be plotted. Of these, the vast majority of respondents are within Greater London and its environs. However, there were also clusters of respondents in Birmingham, Nottingham, Southampton and Glasgow. The density map (map 1) further supports that the greatest proportion of respondents providing postcodes were located in London.

Map1: Location of consultation respondents



3.5.2. Altogether, 3,630 responses were received from postcodes within London Boroughs (see Table 3.6), while 1,231 were received from postcodes outside of London.

Table 3.6: Number of respondents by London borough

Borough	No. of Respondents
City of Westminster	270
Kensington and Chelsea	214
Southwark	207
Camden	199
Wandsworth	190
Barnet	177
Lambeth	176
Islington	173
Tower Hamlets	141
Hackney	133
Ealing	129
Hammersmith and Fulham	126
Waltham Forest	100
Croydon	96
Lewisham	95
Richmond upon Thames	91
Bromley	90
Greenwich	89
Brent	88
Haringey	83
Newham	78
Redbridge	76
Hounslow	71
Hillingdon	68
Merton	66
Enfield	63
Harrow	59
Havering	55
Barking and Dagenham	51
Bexley	49
Kingston upon Thames	47
Sutton	45
City of London	35
Total	3630

4 Analysis of public, community, business and stakeholder responses

4.1. Introduction

4.1.1. This chapter provides an analysis of the feedback provided by the public, community, businesses and stakeholders about the proposals being consulted on.

4.2. Qualitative analysis

4.2.1. The questionnaire asked respondents to provide comments to illustrate their views about the proposals. All of the comments received were reviewed and tagged in order to identify common themes raised by respondents.

4.2.2. Respondents were provided with a free text box under each of the open questions relating to the individual proposals. The qualitative analysis evaluates the frequency that a common theme was raised.

Table 4: Common themes by public, community and business respondents relating to the proposal to increase the penalty charge

Theme	Comment frequency	Percentage
In-principle views	13,457	42.3%
Alternative suggestions to increase compliance	7,452	23.4%
Hardships caused by the proposals	6,251	19.7%
General comments	4,631	14.6%
Total	31,791	100%

4.2.3. Responses were received from 21 stakeholders. A full list of the stakeholders and a summary of each response is provided at Annex B.

5 TfL's response to the issues raised

5.1. Introduction

5.1.1. This chapter sets out TfL's analysis of the responses received to the consultation by theme and its response to the issues and recommendations contained in those responses.

5.2. Theme A: In principle views

5.2.1. Representations made within this theme concerned comments opposing or supporting the proposed increase in principle, or providing some additional context for these views

Analysis of responses

5.2.2. Across all consultation answers, 13,457 comments were made by the public relating to their support or opposition to the proposal. 21 stakeholders commented on issues relevant to this section.

Issues raised

5.2.3. The following is a list of the key issues raised:

- Support or opposition to an increase in PCN level
- Support or oppose increased PCN level for certain reasons/vehicles only
- Uncertain about PCN increase
- Infrastructure issues contribute to offences / contraventions

Support to an increase in PCN level

5.2.4. Public and business respondents made 657 comments relevant to this issue including stating the proposals would improve safety (6), improve traffic flow (5) and that increases to the PCNs should be implemented periodically or annually (1).

5.2.5. Six stakeholder responses supported the proposed increase in the penalty charge for the TLRN and Congestion Charge. The Heart of London Business Alliance broadly agreed with the proposals and did not think that the proposals would unfairly burden businesses in the West End. Hackney Living Streets is supportive of the proposal and the Campaign for Better Transport raised no concerns with the proposals. Living Streets is strongly supportive of the proposals and highlighted the benefits from effective enforcement. Friends of Capital Transport Campaign was also strongly supportive of the proposal but recommended that TfL looks into 'a new system of road charging'. The RAC also supports TfL's proposal to increase compliance with the TLRN and the Congestion Charge. However they raised concerns about the size of the proposed increase.

- 5.2.6. Three stakeholders supported the proposed increase in the penalty charge for the Congestion Charge only. These are the Freight Transport Association, UPS and DHL.

Opposition to an increase in PCN level

- 5.2.7. Public and business respondents made 7,847 comments relevant to this issue including criticism of TfL motivations for increasing the PCN level (3,330 comments), stating the PCN Charge should be reduced as its already high (2,221 comments), proposing that TfL should abolish the charge (1,455 comments) and stating that the charge should not be increased as it will not increase compliance or change driver behaviour (1,389 comments).
- 5.2.8. Seven stakeholder responses opposed the penalty charge increase. The Freight Transport Association, UPS and DHL oppose the TLRN PCN increase only. The British Vehicle Rental and Leasing Association do not support the proposals 'as the true offender is not held to account for leased vehicles'. The London Borough of Camden is not supportive of the proposal without TfL providing more detailed analysis of the data. Westminster City Council opposes an increase in the level of PCNs on the TLRN and in the Congestion Charging zone. The RAC Foundation opposed the proposals for a number of reasons, including (but not limited to) a suggestion that non-compliance with road traffic regulations can be a product of poor signage.

TfL response

- 5.2.9. The increase in the PCN level is required to reinforce and enhance the deterrent effect of a PCN when contravening the rules of the TLRN and Congestion Charge Zone. The prospect of receiving a PCN is not as significant a deterrent against poor driving behaviour as it has been in the past. This is demonstrated by the year on year increases in the number of recorded contraventions and the increasing number of repeat offenders.
- 5.2.10. Increasing the PCN level is expected to have a positive impact on driver behavior, a subsequent impact on contravention and PCN volumes, and a follow on beneficial impact to traffic flow and congestion on London's road network.
- 5.2.11. TfL acknowledges that the TLRN PCN proposal would mean that there is a differentiation between the PCN level which applies to contraventions on TfL and borough roads. TfL approached London Councils in February 2017 to propose running a joint consultation on increasing the PCN level on all roads in Greater London but the offer was not taken up. As has been stated above, the TLRN comprises the strategic roads in London and the volume of traffic using the network is significantly higher than borough roads. It is appropriate that a higher PCN level applies to a contravention of the rules which apply on the TLRN given the impact on the flow of traffic, congestion and road safety is likely to be greater than if the same contravention is committed on a borough road.

5.2.12. By law, net revenues from the Congestion Charging scheme and from TLRN contraventions must be used for relevant transport purposes in London. As such any revenues generated as a result of these proposals will be reinvested in transport initiatives that benefit of everyone that works, lives or visits London.

Support or opposition to increased penalty charges for certain reasons/vehicles only

5.2.13. Public and business respondents made 620 comments supporting the proposal if it was only applied to certain groups / vehicles. The top 3 statements of caveated support included applying the PCN increase only to commercial vehicles (144 comments), those that parked / stopped on the TLRN (138 comments) and to foreign vehicles / visitors to London (125 comments).

5.2.14. Public and business respondents made 989 comments opposing applying the proposed increase. The top groups / vehicles that respondents thought the increase should not apply to are couriers (268), disabled drivers (212), private hire vehicles (180), and the elderly (175).

5.2.15. John Lewis recommended a 'light touch' approach to enforcement against freight vehicles as they are concerned that the proposals would increase delivery costs and highlighted a perceived lack of loading facilities across London.

TfL response

5.2.16. All road users, irrespective of vehicle, age, income, or mobility requirement, should obey the relevant traffic regulations when driving in the CCZ or using the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN.

5.2.17. The rules for Red Routes, of which the TLRN is one, are clearly explained in the latest edition of the Highway Code and are also explained on the TfL website (<https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes>)

5.2.18. Signs and road markings along the TLRN are there to inform customers what they can and can't do. To avoid being issued with a PCN road users should ensure that they follow these signs and road markings.

5.2.19. Customers wishing to drive in the CCZ have to pay a daily charge of £11.50 per day. To avoid contravening the Congestion Charge scheme, TfL offers customers a number of options to pay for the charge. Customers can pay in advance, on the day or by midnight the day after travelling into the CCZ. Congestion Charge customers can also ensure they are never issued with a PCN by signing up for an AutoPay account. With AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month.

- 5.2.20. The Congestion Charge scheme order already includes exemptions for taxis, and PHVs, while blue badge holders receive a 100% discount when their vehicle is registered with TfL.
- 5.2.21. Customers, who believe that they should not have received a PCN or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case.
- 5.2.22. For the above reasons TfL maintains that the PCN increase should apply to all road users travelling on the TLRN or in the CCZ.

Uncertain about PCN increase or not affected by the PCN increase

- 5.2.23. Public and business respondents made 584 comments that they were uncertain about the proposed PCN increases. The majority of comments (319) stated that respondents would need more evidence of the stated impacts of the proposal, while others wanted to look at similar systems and their impacts (155) and some wanted to see how the monies collected would be spent (125).
- 5.2.24. There were 282 comments from public and business respondents that said they would not be affected by the proposals.
- 5.2.25. One stakeholder indicated that they were uncertain about the PCN increase. The Alliance of British Drivers suggested that TfL should conduct further research into collection rates vs repeat offending rates as it was wrong to assume that an increase in the value of PCNs would improve compliance.

TfL response

- 5.2.26. In line with Proposal 129 of the Mayor's Transport Strategy (and proposal 18 of the draft MTS), the proposed increase to the Congestion Charge PCN level and the TLRN PCN change, will be monitored to determine the impact on congestion, traffic flow and traffic speed.
- 5.2.27. By law, net revenues from the Congestion Charging scheme and from TLRN contraventions must be used for relevant transport purposes in London.

Infrastructure, parking or loading issues contribute to offences / contraventions

- 5.2.28. Public and business respondents made 2,478 comments that they believed contraventions were due to infrastructure changes on London's roads or due to a lack of parking and loading bays.
- 5.2.29. The Freight Transport Association also raised the issue of loading bays for freight companies, and this was a view supported by John Lewis, UPS, and DHL.

TfL response

- 5.2.30. TLRN controls are regularly reviewed by TfL and are tailored to local needs. Within these controls TfL offers 8,153 parking spaces at 2,197 locations across London. TfL also offers 1,775 bays where loading of any type is permitted.
- 5.2.31. TfL will continue to work with the public and stakeholders to support the efficient use of local parking or loading bays to the benefit of all road users.

TfL recommendation

No change to the Variation Order

5.3. Theme B: Alternative suggestions to increase compliance

- 5.3.1. Representations made within this theme concern alternative options that could be implemented in order to reduce contravention volumes and tackle the issue of repeat offending.

Analysis of responses

- 5.3.2. Across all consultation answers, 7,452 comments were made by the public relating to this theme. 13 stakeholders commented on issues relevant to this section.

Issues raised

- 5.3.3. The following is a list of the key issues raised:

- TfL should operate a scaled system of penalty charges based on various criteria;
- TfL should improve the existing enforcement approach to tackling contraventions on the TLRN and in the CCZ; and
- TfL should increase enforcement, implement more severe penalties or decrease the amount of enforcement it carries out.

TfL should operate a scaled system of penalty charges based on various criteria

- 5.3.4. Public and business respondents made 2,478 comments on this theme. The most common comments on this topic were, there should be a higher rate for repeat offenders (1,190 comments), there should be greater penalties for high earners (463 comments), and the severity of the penalty should be determined by the offence (359 comments).

TfL response

- 5.3.5. The bandings for TLRN contraventions are set by the Mayor with the approval of the Secretary of State. Information on contravention bandings can be found at <http://www.londoncouncils.gov.uk/download/file/fid/20848>.

- 5.3.6. There are no plans to introduce variable charges depending on income or number of offences etc, for PCNs issued for contraventions on the TLRN or for the Congestion Charge.

TfL should improve the existing enforcement approach to tackling contraventions on the TLRN and in the CCZ;

- 5.3.7. Public and business respondents made 1,452 comments on this theme. The most common comments on this topic were, TfL should improve the appeals system (239 comments), more time should be given to pay the charge (215 comments), and there should be an easier payment system for PCNs (213 comments).
- 5.3.8. The AA proposed identifying contravention hotspots and looking at infrastructure changes to address the issue. Friends of Capita transport proposed a new road user charging solution, as did the Heart of London Business Alliance. The Confederation of Passenger Transport recommended a 'wider and more comprehensive' driver education as an alternative option to issuing PCNs. The FTA UPS and DHL all supported a package of measures to support the freight industry and reduce the number of PCNs they receive.

TfL response

- 5.3.9. TfL has a duty to balance the conflicting needs of all road users against our Network Management Duty, which is to keep traffic moving on our roads. TfL maintains that our existing enforcement strategy is a value for money effective solution, which is also fair and proportionate when a contravention occurs.
- 5.3.10. The proposal to increase the PCN level will be a further tool in ensuring TfL continues to tackle the issues of slow traffic flow and congestion on London's roads.

TfL should increase enforcement, implement more severe penalties or decrease the amount of enforcement it carries out.

- 5.3.11. Public and business respondents made 1,998 comments on this theme. The most common comments on this topic were, TfL should have more traffic wardens (455 comments), TfL should ensure all fines are collected (189 comments), points should go on driver licenses as a result of offending (231 comments), vehicles should be clamped and / or towed (191 comments), there should be less use of CCTV enforcement (169 comments) and there should be no PCN issued for first time offenders (156 comments).
- 5.3.12. John Lewis proposed a lighter touch to freight enforcement. The BVLA proposed that that TfL should lobby for legislative change to ensure that vehicle leasers can be held to account for PCNs issued for contraventions they commit. The Greenwich African Caribbean Organisation suggested banning driving in high-contravention hotspot areas

TfL response

- 5.3.13. TfL has a duty to balance the conflicting needs of all road users against our Network Management Duty, which is to keep traffic moving on our roads.
- 5.3.14. TfL maintains that our existing enforcement strategy is a value for money effective solution, which is also fair and proportionate when a contravention occurs.
- 5.3.15. The proposal to increase the PCN level will be a further tool in ensuring we continue to tackle the issues of slow traffic flow and congestion on London's roads

5.4. Theme C: Hardships caused by the proposals

- 5.4.1. Representations made within this theme concern the potential for the PCN increase to cause hardship to road users or particular groups in society.

Analysis of responses

- 5.4.2. Across all consultation answers, 6,251 comments were made by the public relating to this theme. 2 stakeholders commented on issues relevant to this section.

Issues raised

- 5.4.3. The following is a list of the key issues raised:

- An increased PCN would cause hardship to specific driver types; and
- An increased PCN could have effects on wider economy / society.

An increased PCN would cause hardship to specific driver types

- 5.4.4. Public and business respondents made 4,432 comments on this theme. The most common comments on this topic were that the greatest hardship would be on those making a genuine mistake (2,331 comments) and on those on low incomes (1,437 comments).
- 5.4.5. Westminster City Council opposed an increase in the value of PCNs on the TLRN and in the CCZ because raising the value could cause hardship to residents and businesses

TfL response

- 5.4.6. As per the consultation impact assessment, an equalities impact assessment was undertaken and found that there is no evidence that an increase in the PCN level for the Congestion Charge or TLRN contraventions would disproportionately affect any of the equality target groups. This includes, elderly disabled or drivers on a low income.
- 5.4.7. All road users, irrespective of age, income or mobility requirement, should obey the relevant traffic regulations when driving in the CCZ or on the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN.

An increased PCN could have effects on wider economy / society.

- 5.4.8. Public and business respondents made 1,819 comments on this theme. The most common comments on this topic were, that the change would cause further hardship (719 comments) and that the change would affect the economy or have a detrimental effect on business (480 comments).
- 5.4.9. The Heart of London Business Alliance did not think that the proposals would unfairly burden businesses in the West End.

TfL response

- 5.4.10. Contraventions on the TLRN have a negative impact on traffic congestion and traffic flow. It has been estimated that the cost of congestion on the TLRN alone is annually worth almost £2.2 billion to London's economy.
- 5.4.11. If action is not taken to address the increasing number of CCZ and TLRN contraventions, then the impact on London's economy will continue to grow. TfL has proposed the increase in the CC and TLRN PCN level to actively deter drivers from committing contraventions. It is anticipated that this deterrent effect will reduce the number of contraventions and have a positive impact on congestion and traffic flow. As such this should have a flow on positive impact for businesses.

TfL recommendation

No change to the Variation Order

5.5. Theme D: General comments

- 5.5.1. Representations made within this theme concern any other concerns or issues that respondents may have with the proposals.

Analysis of responses

- 5.5.2. Across all consultation answers, 4,631 comments were made by the public relating to this theme. 3,087 of these comments did not relate to the consultation questions e.g. comments relating to issues with TfL, cyclists, government etc., and 386 comments related to the consultation process itself.

TfL response

- 5.5.3. See Annex C for TfL's response to these general comments

TfL recommendation

No change to the Variation Order

6 Conclusions and recommendations

6.1. TfL's conclusions

- 6.1.1. TfL considers that this Report to the Mayor on the outcomes of the consultation (alongside the Impact Assessment that was provided for the consultation) provides the information and analysis needed for the Mayor to make an informed decision. The Mayor should take into account the range of views expressed during the consultation, as to whether to confirm the Variation Order with or without modifications and to approve the TLRN PCN increase. The Mayor has also been provided with copies of all the consultation responses.
- 6.1.2. In this report, TfL has analysed the consultation responses and set out its views on the representations received on the proposal. Overall, TfL considers that the proposed change represent an appropriate and proportionate response to tackle the issues of ever increasing contraventions and repeat offending in the CCZ and on the TLRN.
- 6.1.3. TfL has noted that:
- 7,847 of all comments made by the public and businesses opposed the proposal, 657 comments supporting it and 1,609 comments supported implementing a change but with some vehicles / road user groups included or excluded from the PCN increase;
 - 7,452 of all comments made by the public and businesses related to alternative ways to increase compliance; and
 - 6,251 of all comments made by the public and businesses related to the hardship that could be caused to road users by increasing the PCN level.
- 6.1.4. Of the twenty two stakeholders who commented on the proposal, the most recurring comments were support for the increase (6), opposition to an increase in the PCN (7), and there are alternative ways to improve compliance other than increasing the PCN level (13).
- 6.1.5. TfL maintains that contraventions on the TLRN along with non payment of the Congestion Charge negatively impacts on all road users and is a factor in increasing levels of congestion in London. An increase in the PCN level is required to reinforce and enhance the deterrent effect of a PCN when contravening the rules of the TLRN or CCZ. By doing so it is expected that this will have a positive impact on driver behavior, a subsequent impact on contravention and Penalty Charge volumes, and a follow on beneficial impact to traffic flow and congestion in London.
- 6.1.6. TfL is not recommending any changes to the Variation Order in response to these issues.

6.2. Recommendations

6.2.1. TfL recommends that the Mayor should:

- Consider the whole of this report and other relevant information available to him, including advice from GLA officers and the contents of the Impact Assessment.
- Consider the responses to the consultation, together with the considerations of TfL, particularly with relation to Chapter 6 of this report.
- Consider whether further consultation, further information or the holding of some form of inquiry is necessary or appropriate prior to his decision whether or not to confirm the Variation Order and the TLRN PCN increase.
- If the Mayor 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 Variation Order and to approve the TLRN PCN increase as described.

6.3. Public inquiry

6.3.1. This section examines the issue of whether the Mayor should hold some form of inquiry as part of a process of determining whether or not to confirm the Variation Order. The GLA Act provides that the Mayor may “hold an inquiry, or cause an inquiry to be held, for the purposes of any order containing a charging scheme”. Whether an inquiry should be held (and if so its scope) to consider the proposed changes to the Congestion Charging scheme is a matter for the Mayor to decide.

6.3.2. None of the respondents to the consultation asked for a public inquiry.

6.3.3. An inquiry could take a number of forms, including a public inquiry. Whilst the Mayor has a broad discretion he must approach the matter with an open mind. He needs to ask himself whether he has sufficient information available without holding an inquiry; and whether the issues raised, by objectors in particular, are sufficiently clear to him so that he can properly assess this information and weigh conflicting views (including taking account of representations and objections) without the benefit of an independent report following an inquiry.

6.3.4. A Congestion Charging case, *R (Westminster City Council) v Mayor of London* [2003] LGR 612, held at common law that the Mayor had to apply his mind genuinely and rationally to the issue of whether to hold an inquiry, taking into account all relevant considerations, and that, save perhaps exceptionally, Article 6 of the European Convention did not require an inquiry to be held.

6.3.5. TfL does not consider that any significant evidence beyond that already supplied by TfL and GLA officers would emerge in an inquiry which would assist the Mayor’s decision. An inquiry would also delay the confirmation of the Variation Order. TfL does not consider there are any issues which point strongly to the holding of an inquiry and does not recommend that an inquiry be held. However, the Mayor is advised that these issues should not be the prime focus in determining whether to hold an inquiry.

Annex A: Greater London (Central Zone) Congestion Charging (Variation and Transitional Provisions) Order 2017

GREATER LONDON AUTHORITY ACT 1999

TRANSPORT ACT 2000

Greater London (Central Zone) Congestion Charging (Variation) Order 2017

<i>Made</i>	16 August 2017
<i>Coming into force</i>	In accordance with article 1(2)

Whereas—

- (1) the Greater London (Central Zone) Congestion Charging Order 2004 (“the Principal Order”) imposes charges for the using and keeping of motor vehicles on specified roads in Greater London during specified hours and on specified days;
- (2) Transport for London has made a number of orders varying the provisions of the Principal Order; and
- (3) it appears to Transport for London expedient for the purposes of facilitating the achievement of policies and proposals in the Mayor of London’s Transport Strategy published pursuant to section 142 of the Greater London Authority Act 1999⁽¹⁾ that it should make an Order for the purpose of further varying the Principal Order:

Now, therefore, Transport for London, in exercise of the powers conferred on it by sections 295 and 420(1) of the Greater London Authority Act 1999, by Schedule 23 to that Act, and of all other powers enabling it in that behalf, hereby makes the following Order:—

Citation, commencement and interpretation

1. —(1) This Order may be cited as the Greater London (Central Zone) Congestion Charging (Variation) Order 2017.
- (2) This Order shall come into force 7 days following the day on which the Mayor confirms it.
- (3) In this Order “the Principal Scheme” means the Scheme contained in the Schedule to the Greater London (Central Zone) Congestion Charging Order 2004 as varied and in force immediately before this Order comes into force.

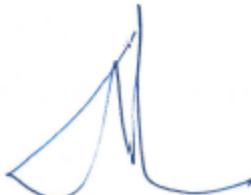
⁽¹⁾ 1999 c.29; Schedule 23 was amended by the Transport Act 2000 (c.38), Schedule 13

Variation of the Principal Scheme

2. — The Scheme set out in the Schedule to this Order (the “Variation Scheme”), which varies the Principal Scheme, shall have effect.

Signed by authority of Transport for London

16 August 2017



Managing Director, Surface Transport

THE SCHEDULE

Article 2

SCHEME VARYING THE PRINCIPAL SCHEME

Preliminary

1.—(1) Article 1 of the Principal Scheme shall apply, so far as material, for the interpretation of this Scheme as it applies for the interpretation of the Principal Scheme.

(2) The Principal Scheme shall be further varied in accordance with article 2 of this Scheme.

Penalty Charge for non-payment of charge

2.—(1) Article 12 of the Principal Scheme shall be amended as follows.

(2) In paragraph (3) for “£130” there shall be substituted “£160” and for “£65” there shall be substituted “£80”.

(3) In paragraph (4) for “£195” there shall be substituted “£240”.

Annex B: Full list of stakeholder organisations, businesses and community organisations who responded to the consultation

Stakeholder organisations who responded to the consultation

The following stakeholders have provided a response to the consultation:

- (a) RAC - supports TfL's proposal to increase compliance with the TLRN and the Congestion Charge. However the RAC has raised concerns with the size of the proposed increase;
- (b) RAC Foundation - Opposed to the proposals on the basis of several points, including that non-compliance with Congestion Charge and Red Route traffic controls is a symptom of poor signage or road layout, amongst other issues. Generally argued that there was a lack of evidence to justify the proposed increase.
- (c) Automobile Association – suggested that TfL and London Boroughs should not collect revenue from PCNs, and instead should have high-contravention 'hot-spots' independently inspected to determine if an engineering solution might improve compliance. Suggested that only repeat offenders should receive PCNs (first time offenders should be sent a warning letter only)
- (d) London Councils – has flagged concerns that the proposal would lead to inconsistencies between the value of Borough road PCNs and those issued on the TLRN. London Councils has made no comment on the proposal to increase the Congestion Charge PCN;
- (e) London Borough of Camden – is not supportive of the proposal without TfL providing more detailed analysis of the data. LB Camden is also concerned that there will be inconsistencies between the value of Borough road PCNs and those issued on the TLRN;
- (f) London Borough of Merton – made no specific comments regarding support or opposition to the proposal;
- (g) Westminster City Council – opposes an increase in the value of PCNs on the TLRN and in the Congestion Charging zone because raising the value could cause hardship to residents and businesses.
- (h) Friends of Capital Transport Campaign – Recommended 'a new system of road charging', but were strongly supportive of the proposal.
- (i) Alliance of British Drivers – Suggested that it is wrong to assume that an increase in the value of PCNs would improve compliance. Requests research on collection rates vs repeat offending rates.
- (j) Campaign for Better Transport – Raised no concerns with the proposals.

- (k) Confederation of Passenger Transport – Recommended ‘wider and more comprehensive’ driver education as an alternative, and was critical of the administrative processes followed in issuing PCNs.
- (l) Freight Transport Association - opposes the TLRN PCN increases unless TfL also implements a package of measures to support operators comply with TLRN traffic rules. The proposal to increase the Congestion Charge PCN level is supported by the FTA.
- (m) British Vehicle Rental and Leasing Association – Could not support the proposals ‘as the true offender is not held to account for leased vehicles’, and suggested that TfL should lobby for legislative change to ensure that vehicle leasers can be held to account for PCNs issued for contraventions they commit.
- (n) Heart of London Business Alliance – Broadly agreed with the proposals and suggested that TfL explore new road charging regimes, including an emissions-based regime. Did not think that the proposals would unfairly burden businesses in the West End.

Businesses who responded to the consultation

- (o) UPS – wrote to support/endorse the response from FTA (see above)
- (p) John Lewis – Recommended a ‘light touch’ approach to enforcement against freight vehicles. Concerned that the proposals would increase delivery costs and highlighted a perceived lack of loading facilities across London.
- (q) DHL - wrote to support/endorse the response from FTA (see above)

Community organisations who responded to the consultation

- (r) Hackney Living Streets – is supportive of the proposal.
- (s) The Soho Society – requested that TfL take enforcement action against vehicle noise (sounding of horns specifically) at night in the Soho area.
- (t) Living Streets – strongly supportive of the proposals and highlighted the benefits from effective enforcement.
- (u) Greenwich African Caribbean Organisation – suggested banning driving in high-contravention hotspot areas and improving public transport. Also recommended encouragement of walking, cycling, car sharing, etc.

Annex C: Summary of responses

TfL has carefully considered every single issue raised by respondents to the consultation. This section lists every issue raised, as well as TfL's response to each of these.

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

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

To further assist readers of this report, TfL has organised the issues raised by respondents thematically, and have broken down each of the categories above into these 'themes'.

In-principle views

Theme	Issue	TfL's response
Support increase in PCN	Yes, increase the PCN charge	Noted
	Would improve safety	Noted
	Support annual / periodic increases	<p>Consultation on the Mayors Transport Strategy ended on 2 October 2017. Proposal 18 states that “The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy”. As such the Mayor, through TfL, will continue to ensure that the scheme is reviewed regularly to ensure that our penalty and enforcement strategy supports the objectives of the scheme.</p> <p>Should TfL determine that further changes are required to the scheme in order to reduce congestion then this will be discussed with the Mayor. There are currently no plans for an annual increase to the PCN level.</p>
	Would improve traffic flow	This benefit is noted within the consulttaion impact assessment section 2.2.

Theme	Issue	TfL's response
Support increased charges for certain reasons/vehicles only	Stopping in yellow box	<p>All contraventions on the TLRN have a negative impact on traffic congestion and traffic flow. This is because vehicles parked on the TLRN, driving in bus lanes or entering yellow box junctions disrupt the flow of traffic, slow down other road users and lead to congested roads. It has been estimated that the cost of congestion on the TLRN alone is annually worth almost £2.2 billion⁴.</p> <p>By increasing the PCN level for all moving traffic contraventions TfL is taking action to address poor driving behaviour that directly leads to increased levels of traffic congestion and poor traffic flow. Implementing an increase to only one contravention would dilute the impact of the proposed change and would not have the desired effect as outlined in the consultation impact assessment.</p>
	Stopping in a red route	
	Commercial vehicles	All contraventions on the TLRN have a negative impact on traffic congestion and traffic flow. This is because vehicles parked on the TLRN, driving in bus lanes or entering yellow box junctions disrupt the flow of traffic, slow down other road users and lead to congested roads.
	Private hire cars	
	Taxis	
	Uber	
	Overseas drivers / visitors (including within UK)	TfL's priority in managing the TLRN is to keep traffic moving. The legislation used to enforce traffic contraventions on the TLRN does not distinguish between vehicle types or driver groups and as such TfL can not selectively enforce against a particular group of road users.
	Diplomatic cars	
	Private cars (not hired)	<p>The Congestion Charge scheme order allows for exemptions and discounts to be applied to some road users. Taxis and PHV's (of which Uber is a PHV operator) are exempt from paying the charge. A full list of vehicles that qualify for a discount or exemption can be found at https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions</p> <p>Consultation on the Mayors Transport Strategy ended on 2 October 2017. Proposal</p>

⁴ Total vehicle delay for London 2014-15 <http://content.tfl.gov.uk/total-vehicle-delay-for-london-2014-15.pdf>

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

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

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

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

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

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

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

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

Theme	Issue	TfL's response
		<p>https://tfl.gov.uk/modes/driving/red-routes/exemptions</p> <p>Blue Badge holders can also pick up and drop off on the TLRN roads marked with red lines if this is quick.</p>
	Introduce registration to book delivery bays	<p>TfL has no plans at present to introduce a system to allow for bookable delivery bays.</p> <p>For more information on parking and loading legally on the TLRN please go to http://content.tfl.gov.uk/parking-and-loading-legally.pdf</p>

Alternative suggestions to increase compliance

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

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

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

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

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

Theme	Issue	TfL's response
Operate a scaled system of penalty charges based on various criteria	Income (higher charges for higher earners)	Every civil parking and traffic contravention has a code and description, see http://www.londoncouncils.gov.uk/download/file/fid/20848 .
	Number of offences (higher charges for repeat offenders)	This document identifies the contraventions that that are classified as higher and lower level parking and moving traffic contraventions. TfL has consulted on TLRN parking and moving traffic contraventions that are issued at the higher Band A rate (currently £130) as these are considered as more serious contraventions than the lower Band B rate (currently £110).
	Severity of offence (lower charges for mistakes)	
	Value of car (higher charges for more expensive cars)	These bandings for TLRN contraventions are set by the Mayor with the approval of the Secretary of State. There are no plans to introduce variable charges depending on income or number of offences etc.
	Engine size (higher charges for larger engines)	The CC PCN level is consistent with other enforcement legislation. There are no plans to introduce variable charges depending on income or number of offences etc.
	Age of vehicle	
	Proximity to central London (Higher in Zone 1)	
	Based on inflation / cost of living	
	Different penalties applied to Red Routes and the Congestion Charge	

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

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

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

Theme	Issue	TfL's response
		<p>An interactive map of the CCZ can be found at https://tfl.gov.uk/modes/driving/congestion-charge/congestion-charge-zone</p> <p>Alternative routes are available for vehicles to drive around rather than through the CCZ.</p>
	Introduce Park and Ride scheme	TfL has no plans to introduce park and ride schemes.
	Inform insurance companies of repeat offenders	TfL is not clear what this proposal would achieve. Failure to pay a PCN is a civil rather than criminal offence and currently has no bearing on someones insurance premium.
	Name and shame offenders	Data protection legislation would prevent TfL from naming and shaming offenders. TfL has no plans to do this.
Less enforcement of existing PCN system is needed	Less use of CCTV	<p>TfL has a duty to balance the cost of enforcement against our Network Management Duty, which is to keep traffic moving on our roads.</p> <p>The deterrent effect and subsequent benefits of camera enforcement is well known and understood in London and plays a crucial role in reducing the number of contraventions.</p> <p>TfL intends to maintain its current CCTV strategy, but will keep it under review in order to ensure its duties are met and remain value for money.</p>
	Abolish red routes / congestion charge zone	<p>TfL's road network is designated as red route in light of its strategic importance in keeping traffic in London moving.</p> <p>The Congestion Charge Scheme was implemented to help address congestion on</p>

Theme	Issue	TfL's response
		London's roads. TfL has no plans to abolish either.
	Allow more time in yellow boxes	<p>The purpose of a yellow box is to keep the area clear of stationary traffic to facilitate the movement of traffic through the junction. Any vehicle stopping in a yellow box risks causing an obstruction and impeding traffic flow.</p> <p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the road network. TfL's roads carry over a third of all London's traffic and we enforce traffic regulations to keep traffic moving safely and efficiently for the benefit of all road users, and support the economic life of the city.</p>
	Less over-zealous traffic wardens	<p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the road network. TfL's roads carry over a third of all London's traffic and we enforce traffic regulations to keep traffic moving safely and efficiently for the benefit of all road users, and supporting the economic life of the city. As such we will continue to review our enforcement approach to ensure it is an ongoing deterrent to drivers committing contraventions on London's roads.</p>
	More flexible red route / congestion charging zone times	
No fine for first time offenders	<p>All road users should obey the relevant traffic regulations when driving through the CCZ) or using the TLRN. At present c.97% of road users comply with these regulations and so avoid being issued with a PCN.</p> <p>First time offenders, who believe that they should not have received a PCN for a contravention on the TLRN or for non payment of the Congestion Charge, or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case. More information on representations and appeals can be found at https://tfl.gov.uk/modes/driving/congestion-charge/penalties-and-enforcement/challenge-a-penalty-charge/make-a-representation and https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>	

Theme	Issue	TfL's response
	Allow other vehicles to enter bus lanes or remove bus only lanes	<p>Part of TfL's Network Management Duty is to ensure the expeditious movement of traffic, which includes the movement of passenger transport services.</p> <p>TfL is responsible for the reliable operation of bus services in London, which rely on the use of bus lanes. As such there are no plans to allow additional vehicles, apart from those already permitted, to travel in bus lanes.</p>
	Relax rules during events	<p>TfL is committed to keeping the Capital moving, working and growing and to achieve this we take appropriate action regarding enforcement across the road network. This is equally applicable during major events that may impact the road network and the flow of traffic.</p>

Hardships caused by the proposals

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

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

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

Theme	Issue	TfL response	
	London residents	<p>by signing up for an AutoPay or Fleet AutoPay account. With AutoPay customers will never receive a PCN, will pay a reduced daily rate of £10.50 to enter the zone and will have their payment deducted automatically from their bank account or debit / credit card each month.</p> <p>Customers, who believe that they should not have received a PCN or have mitigating circumstances regarding their ability to pay a PCN, can raise a representation with TfL to review their case.</p> <p>The following should also be noted for the Congestion Charge:</p> <ul style="list-style-type: none"> • Through the NHS reimbursement, patients and a number of medical professionals can claim back the cost of their Congestion Charge; and • Motorcycles are exempt from the Congestion Charge. 	
New drivers / learners	Motorcycle users		
Parents with children	All drivers (increased stress)		
Those making genuine mistakes or being forced into them			

General comments

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

Theme	Issue	TfL response
		<p>Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p> <p>2. A good public transport experience</p> <p>Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <p>3. New homes and jobs</p> <p>More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p> <p>For more information on how the Mayor plans for cycling in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	<p>Negative comments about private hire vehicles (e.g. ban them)</p>	<p>The Mayor has recently consulted on his draft transport strategy. This consultation ended on 2 October 2017. Proposal 73 in the draft MTS states that "The Mayor, through TfL, will seek powers to limit the overall number of private hire vehicles licensed for use in London so as to manage their contribution to overall congestion.</p> <p>For more information on how the Mayor plans to manage PHVs in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	<p>Negative comments about rickshaws (taking up space on road, do not pay tax etc.)</p>	<p>Pedicabs, or cycle rickshaws, are not regulated by TfL and we recognise that they can cause disruption to other road users. Pedicabs may be a common sight in London's West End, but their riders do not need to be licensed, have insurance or be checked by the Criminal Records Bureau.</p>

Theme	Issue	TfL response
		TfL has previously called for a change to legislation that would allow us to ban dangerous Pedicabs in London.
	General negative comments about TfL not relating to PCN	Complaints or feedback concerning the services offered by TfL should be directed to the relevant business area through the following webpage https://tfl.gov.uk/help-and-contact/
	General negative comments about government	Issues with either local authorities, the GLA or central government should be addressed directly with the authority or department concerned.
	Remove traffic calming measures / street furniture	<p>Following the establishment of the Mayors Roads Task Force (RTF) in 2013, London has seen a significant number of changes in road layout and design across the TLRN. In 2014 TfL responded to the vision set out by the RTF through its £4b Roads Modernisation Plan. This has resulted in an unprecedented programme of planned road improvements and transformations across both the TLRN and Greater London.</p> <p>Further enhancements and improvements to London's transport network are outlined in the draft Mayors Transport Strategy. The document sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years.</p> <p>https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	General concerns about pollution / air quality	<p>The Mayor recognises that air pollution has a detrimental impact on everyone who works, lives or visits London.</p> <p>In the draft Mayors Transport Strategy, Policy 5 states that The Mayor, through TfL and working with the boroughs, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and</p>

Theme	Issue	TfL response
		<p>support London reaching compliance with UK and EU legal limits as soon as possible. Measures will include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/ levies, responsible procurement, the making of traffic restrictions/ regulations and local actions.</p> <p>For more information on how the Mayor plans to address the issues of pollution and air quality in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	<p>Improve cycle infrastructure</p>	<p>The Mayor has recently consulted on his draft transport strategy. This consultation ended on 2 October 2017. The themes of the strategy that are relevant to this issue are:</p> <ol style="list-style-type: none"> 1. Healthy Streets and healthy people <p>Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p> <ol style="list-style-type: none"> 2. A good public transport experience <p>Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <ol style="list-style-type: none"> 3. New homes and jobs <p>More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p> <p>For more information on how the Mayor plans for cycling in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-</p>

Theme	Issue	TfL response
		transport-strategy-2017
	Improve pedestrian infrastructure	<p>The Mayor has recently consulted on his draft transport strategy. This consultation ended on 2 October 2017. The themes of the strategy that are relevant to this issue are:</p> <ol style="list-style-type: none"> 1. Healthy Streets and healthy people <p>Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p> <ol style="list-style-type: none"> 2. A good public transport experience <p>Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <ol style="list-style-type: none"> 3. New homes and jobs <p>More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p> <p>For more information on how the Mayor plans for healthy streets in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Congestion charge / PCN has no impact on congestion	<p>TfL maintains that an effective enforcement regime on the TLRN and the introduction of the CCZ in 2003 has had a positive impact on congestion, particularly in central London. For more information on current traffic flows and level of congestion please go to http://content.tfl.gov.uk/travel-in-london-report-9.pdf</p>
Ban diesel and highly	<p>The Mayor recognises that air pollution has a detrimental impact on everyone who</p>	

Theme	Issue	TfL response
	polluting vehicles	<p>works, lives or visits London. In the draft Mayors Transport Strategy, Policy 5 states that The Mayor, through TfL and working with the boroughs, will take action to reduce emissions – in particular diesel emissions – from vehicles on London’s streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures will include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/ levies, responsible procurement, the making of traffic restrictions/ regulations and local actions.</p> <p>For more information on how the Mayor plans to address the issues of pollution and air quality in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Introduce lower speed limits to improve traffic flow	<p>The draft MYS states that “A new ‘Liveable Neighbourhoods’ programme of local measures will also be essential to address pollution at borough level in local air quality hotspots and at sensitive locations such as schools. TfL and the boroughs will also be expected to take targeted action and fulfil their statutory duties, including using tools such as road charges, differential parking charges, street closures and vehicle restrictions, tackling engine idling, promoting efficient driving, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate)”.</p>
	Negative comments about commercial vehicles	<p>TfL regularly engages with the freight industry and our customers to understand any issues they may have when using London’s roads. In 2013 TfL took action to address business and customer concerns by adding almost 600 stop and shop bays to the TLRN, an increase of nearly a third.</p>
	Differences in transport enforcement policies across London Boroughs	<p>Issues with enforcement in London boroughs should be directed to the relevant local authority.</p>
	Negative comments about motorcycles	<p>The Mayor has recently consulted on his draft transport strategy. This consultation ended on 2 October 2017. The themes of the strategy that are relevant to this issue</p>

Theme	Issue	TfL response
	Negative comments about pedestrians	<p>are:</p> <ol style="list-style-type: none"> 1. Healthy Streets and healthy people <p>Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.</p> <ol style="list-style-type: none"> 2. A good public transport experience <p>Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.</p> <ol style="list-style-type: none"> 3. New homes and jobs <p>More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.</p> <p>For more information on how the Mayor plans for healthy streets in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Encourage car sharing	
	General road safety concerns	
	Stop engine idling when in congestion or traffic jams	<p>The draft MYS states that “A new ‘Liveable Neighbourhoods’ programme of local measures will also be essential to address pollution at borough level in local air quality hotspots and at sensitive locations such as schools. TfL and the boroughs will also be expected to take targeted action and fulfil their statutory duties, including using tools such as road charges, differential parking charges, street closures and vehicle restrictions, tackling engine idling, promoting efficient driving, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate)”.</p>
	Increase other taxes to gain revenue (Council	TfL can not comment as it has no tax raising powers to take such steps.

Theme	Issue	TfL response
	tax, car tax etc.)	
	Public transport is a good alternative / adequate	Noted
	Use River Thames / canals for deliveries	<p>In TfL's River Action plan we state that "Freight transport on the Thames within London is expected to increase substantially over the next 10 years or so, primarily owing to a commitment by major infrastructure projects, including the Thames Tideway Tunnel and Northern line extension, to maximise use of the river, but also through increasing modal shift. The Port of London Authority (PLA) is confident that the Thames can accommodate this predicted rise in freight movements, together with the proposed increase in passenger journeys. Where there are local issues, these will be managed by the PLA."</p> <p>Further information on using London's river network for deliveries can be found at https://tfl.gov.uk/info-for/deliveries-in-london/delivering-goods-by-water</p>
	Once one borough increases charge, others will follow	TfL can not comment on what plans London Boroughs may or may not have to consult on PCN charges on borough roads.
	All cars should be manufactured as low emission / electric vehicles	<p>The Mayor recognises that air pollution has a detrimental impact on everyone who works, lives or visits London. In the draft Mayors Transport Strategy, Policy 5 states that The Mayor, through TfL and working with the boroughs, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures will include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/ levies, responsible procurement, the making of traffic restrictions/ regulations and local actions.</p> <p>The draft MYS also states that "A new 'Liveable Neighbourhoods' programme of</p>

Theme	Issue	TfL response
		<p>local measures will also be essential to address pollution at borough level in local air quality hotspots and at sensitive locations such as schools. TfL and the boroughs will also be expected to take targeted action and fulfil their statutory duties, including using tools such as road charges, differential parking charges, street closures and vehicle restrictions, tackling engine idling, promoting efficient driving, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate)".</p> <p>For more information on how the Mayor plans to address the issues of pollution and air quality in London go to https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017</p>
	Comments about the T-Charge	<p>Older vehicles driving in central London now need to meet minimum Euro emission standards or pay an extra daily charge. This is in addition to the Congestion Charge. The T-Charge (officially known as the Emissions Surcharge) operates in the Congestion Charge zone and is part of our commitment to help clean up London's dangerously polluted air.</p> <p>For further information on the T-Charge please go to https://tfl.gov.uk/modes/driving/emissions-surcharge</p>
	Introduce road user charging / mileage based charges	<p>Consultation on the Mayors Transport Strategy ended on 2 October 2017. Proposal 18 of the strategy states that "The Mayor will give consideration to the development of the next generation of road user charging systems. These could replace schemes such as the Congestion Charge, Low Emission Zone and Ultra Low Emission Zone. More sophisticated road user charging and/or workplace parking levy schemes could be used to contribute to the achievement of the policies and proposals in this strategy, including mode share, road danger reduction and environmental objectives, and to help reduce congestion on the road network and support efficient traffic movement. In doing so, the Mayor will consider the appropriate technology for any future schemes, and the potential for a future scheme that reflects distance, time, emissions, road danger and other factors".</p>

Comments on the consultation process itself	Criticism of consultation in general / won't be listened to	We hope that this Consultation Report, which includes our response to every issue raised by respondents to our consultation, demonstrates our commitment to listening carefully.
	Criticism of questionnaire	We designed our consultation questionnaire to provide the greatest scope for respondents to comment about any issue of concern while providing us with meaningful and detailed feedback that would be of use in the Mayor's decision making.