

Transport for London

**Non-statutory consultation on the future of
the Western Extension of the Congestion
Charging Zone**

Report to the Mayor

November 2008

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Chapter 1: Executive Summary

This Executive Summary presents a brief overview of the non-statutory consultation on the future of the Western Extension. For more information, please see the full Report to the Mayor, which is available at www.tfl.gov.uk/westernextension.

1. Context and Purpose of the Consultation

The Mayor of London, Boris Johnson, pledged in his election manifesto to hold a consultation in order to listen to views on the future of the Western Extension of the Congestion Charging Zone.

This Executive Summary is part of the report which informs the Mayor of the findings of that consultation. It summarises the responses from the public, businesses and other organisations as well as stakeholders, including London Boroughs, which have a particular interest in the area.

To complement the consultation, TfL commissioned two attitudinal surveys in order to provide a more representative picture of the views of Londoners and London businesses.

The information in the report will help the Mayor decide how to proceed with regard to the Western Extension. For most of the options presented, there would need to be subsequent, statutory consultations.

At the time of consulting, it appeared that the earliest that the Western Extension could be removed or changes could be made to the scheme was at the end of 2009, although the consultation materials noted that some changes to the scheme would require longer implementation timescales and could not be delivered until 2010. Developments since the start of the consultation mean that it is now unlikely that the Western Extension could be removed or changes be made to the scheme before spring 2010. However, if the Mayor decides that he is minded to change or remove the Western Extension, TfL would endeavour to minimise the timescales involved.

2. The options presented in the consultation

When the consultation was launched on 1 September, the Mayor said that he was keen to hear views on changing the Western Extension as well as keeping it as it is, or removing it. Accordingly, the public questionnaire contained within the information leaflet and available online presented a range of options: to keep the Western Extension as it is; remove the Western Extension; or to change the way that the scheme operates.

Three specific options for changing the scheme were suggested: to introduce an account-based payment system; introduce a charge-free period in the middle of the day in the Western Extension; and to increase the Residents' discount from 90 per cent to 100 per cent. Respondents were also invited to say if there were other changes they would like to see made to the Western Extension.

Accompanying the public information leaflet, a Supplementary Information document was published, which provided more detail and context than was feasible in the leaflet.

The options presented and a summary of their potential impacts on London, are shown in Figure 1 below.

Figure 1: Impacts summary table

	Traffic and congestion impacts	Environmental impacts (levels of emissions of CO ₂ and air quality pollutants)	Impact on net revenues for investment in transport	Impacts summary
Keep the Western Extension				The benefits of the scheme in terms of reduced traffic and emissions would be retained, and net revenues for investment in transport would be retained.
Remove the Western Extension				Traffic levels would rise significantly, leading to increased congestion. Also some increases in CO ₂ emissions and pollutants from vehicles. Net revenues for investment in transport would fall by about £70m per year.
Introduce accounts and residents daily payment across the whole zone				There could be small increases in traffic and congestion levels and in vehicle emissions. Net revenues for investment in transport would fall by about £50m per year.
Introduce a charge-free period in the Western Extension				Traffic and congestion levels would increase during the free period, and there would be some small increases in emissions of both CO ₂ and air pollutants from vehicles. Net revenues for investment in transport would be reduced by about £20m per year.
100% discount for residents across the whole zone				There could be small increases in traffic and congestion levels and in vehicle emissions. Net revenues for investment in transport would be reduced by about £10m per year.

Key

	Increase		Neutral impact/broadly neutral
	No change/small change		Moderately negative impact
	Decrease		Significantly negative impact

3. Description of the Consultation

The consultation took place from 1 September to 5 October 2008. Information about the options was set out in an information leaflet which could be downloaded from the Transport for London website or requested free of charge from the call centre. Respondents could register their views via the online questionnaire or by completing the paper questionnaire attached to the leaflet, as well as by letter or email. TfL notified some 300 stakeholders of the consultation and invited them to respond, and met with a number of key stakeholders to discuss the consultation.

TfL representatives briefed London boroughs about the consultation at a meeting of London Councils on 12 September 2008; and also attended a public meeting hosted by the London Borough of Hammersmith & Fulham on 1 October 2008.

TfL commissioned Accent, a market and opinion research company, to analyse the public, business and other organisation responses received up to 7 October 2008 (the online questionnaire closed at midnight on 5 October 2008). Responses from the public, business and other organisations after 7 October were analysed by TfL; any subsequent responses received after TfL's analysis have been simply forwarded to the Mayor. The tables below show the numbers of responses received. TfL analysed all stakeholder responses.

Responses analysed by Accent (up to 7 October 2008)

Source	Number received
Online questionnaire	21,292
Paper questionnaire	6,207
Open responses (letters, emails)	78
Total	27,577

Responses analysed by TfL (received after 7 October 2008)

	Number received
Paper questionnaire	263
Open responses (letters, emails)	8
Total	271

48 stakeholders responded to the consultation.

Since consultations can tend to over-represent those with strong opinions or who feel most directly affected by the issue, it is important also to understand how representative these views are of the wider population. Therefore, TfL commissioned from Accent two attitudinal surveys in order to complement the consultation findings: a survey of 2,000 Londoners and a survey of 1,000 businesses.

4. The Western Extension in Context

The Congestion Charge is an £8 daily charge for driving or parking a vehicle on public roads within the Congestion Charging zone 7.00am to 6.00pm, Monday-Friday, excluding weekends and public holidays and between 25 December and 1 January inclusive.

When Congestion Charging was introduced into central London in February 2003, it covered some 22 square kilometres, with the Inner Ring Road forming its boundary. In February 2007, the Congestion Charging zone was extended westwards to cover a further 17 square kilometres, including most of Kensington & Chelsea and Westminster. The extended Congestion Charging scheme operates as one zone, with the same charges, discounts and exemptions applying no matter where you drive in the zone.

By law, all net revenue earned from Congestion Charging has to be spent on improving transport in London. In 2007/8, after accounting for costs, the Congestion Charging scheme generated some £137m in net revenues that were invested in transport in London.

TfL has a comprehensive monitoring programme for the Congestion Charging zone, covering traffic and environmental impacts, the use of revenues and social and economic impacts. This information is published in an Annual Monitoring Report, which is available at:

<http://www.tfl.gov.uk/assets/downloads/sixth-annual-impacts-monitoring-report-2008-07.pdf>

5. Impacts of the Western Extension

As expected, traffic in the Western Extension has been reduced by the scheme, with around 30,000 fewer cars entering the area each day. Charging has also helped to reduce vehicle emissions and encouraged people travelling in the area to use public transport, or to walk or cycle.

Initially there were significant congestion reductions in the Western Extension of around 20 percent. Traffic volumes still remain well below those seen before the Western Extension was introduced.

However, subsequent changes in the area, such as major development and utility works, and initiatives which have reduced effective road capacity, have resulted in increased congestion.

Currently, congestion levels are broadly the same as those experienced in 2006, prior to the introduction of charging. However, without the Western Extension in place (whereby some deterred traffic returned to the constrained network), congestion would be likely to be significantly worse.

Information on the potential impacts of the options for changing the Western Extension – both on individuals and on London generally – was provided in summary form in the leaflet and the website, and in a more detailed 32-page Supplementary Information document, which could be downloaded online.

6. Summary of Consultation Responses

The Consultation and the Attitudinal Surveys

Respondents to the consultation using the questionnaire were asked to state if they were responding in an individual capacity or as a representative of a business. The vast majority (90%, 24,803) identified themselves as individuals, with only 9% (2,390) stating that they were responding as a business. To facilitate a detailed analysis and understanding of the responses, businesses were asked to state if they operated in the Western Extension, the original central zone or elsewhere in London.

Individual respondents were allocated to the following areas of London based on where they live:

- WEZ/WEZ buffer – people living within the Western Extension area and within the area immediately adjacent to the Western Extension boundary who are eligible for the Residents' discount
- OCZ/OCZ buffer – people living within the original charging zone and also within the area immediately adjacent to the original charging zone boundary who are eligible for the Residents' discount
- Rest of London – people living outside both the original charging zone and the Western Extension and their Residents' discount areas
- Outside London – people living outside the capital

In the attitudinal survey of 2,000 Londoners, residents of the following four areas were surveyed by Computer Assisted Telephone Interview:

- Residents of the original central zone and its 'designated' buffer zones (referred to as OCZ/OCZ buffer)
- Residents of the Western Extension and its 'designated' buffer zones (referred to as WEZ/WEZ buffer)
- Residents of a 5-mile 'ring' in Inner London surrounding the entire Congestion Charging Zone
- Residents of the rest of London

From these four samples an 'All London' group which is representative of London as a whole was produced

In the attitudinal survey of 1,000 London businesses, businesses in the Western Extension, the original central zone and in the rest of London were surveyed. As for the public survey, these three samples were used to produce a representative sample of all London businesses.

Responses to the consultation options

Option 1 Keep the Western Extension as it is

Overall, 19% of all respondents (individuals and businesses) to the consultation chose this option (21% of individual respondents and 6% of business respondents respectively). 19% of residents in the Western Extension and its designated buffer zones preferred keeping the Western Extension, compared to 46% of residents in the original charging zone and its buffer zones. In the attitudinal surveys, there was slightly stronger support for this option than in the consultation: 30% of Londoners and 23% of London businesses selected this option. Both businesses and the public in the original charging zone were more supportive of this option than the public and businesses in the Western Extension.

Around half of the stakeholders (23 of 48) preferred this option, although some made their support conditional on other changes. Eight stakeholders said that the Congestion Charging zone should operate as two zones, including the City of London, London First and London TravelWatch. The main reason for this was to reduce congestion caused by residents of one zone being able to use their 90 per cent discount to drive in the other. A number of transport and environment representative groups noted that the Congestion Charge contributed to a shift to more sustainable modes of transport.

The Campaign for Clean Air in London and the London Assembly Green Group stated that the Western Extension should remain in place, given the statutory duty on the Mayor to take action to meet limit values for air quality. The London Borough of Southwark was concerned that a removal of the Western Extension would reduce the revenue available to improve transport in London and could set a precedent for other changes which would lead to an incremental degradation of the Congestion Charging zone.

The Royal Borough of Kensington and Chelsea said that on balance an argument could be made for retaining the Western Extension, though with mitigation of some of its more unappealing features. They noted that the reduction in traffic achieved by the Congestion Charging scheme has enabled visitor parking bays to be reassigned to other uses – for instance for car clubs and motorcycle bays. It also plans to put cycle parking in four more under-used bays but state that its ability to find further bays for these uses or for a cycle hire scheme would be very much reduced were demand for visitor parking to rise again as a result of the removal of the Western Extension.

Option 2 Remove the Western Extension

Overall, this was the most preferred of the three 'Keep, Remove, Change' options, and was selected by the biggest proportion of respondents to both the consultation and the surveys. In the consultation responses, it was selected by 69% of the respondents overall, with 67% of individual respondents and 86% of business respondents preferring this option. 57% of those living in the Western Extension and its designated buffer zones selected the removal of the Western Extension, whilst 33% of residents in the original charging zone and its designated buffer zones also selected this option. Of business respondents operating in the Western Extension, 89% said they wanted it removed.

In the attitudinal surveys, support for this option was lower than in the consultation, however it was still the most preferred option, selected by 50% of businesses and 41% of the public. 59% of businesses in WEZ, and 48% of the public in WEZ, supported this option in the attitudinal survey.

12 stakeholders preferred this option, including both the London Assembly Conservative group and the Liberal Democrat group, five boroughs (the London Boroughs of Islington, Hammersmith & Fulham, Wandsworth and Westminster City Council and Bexley), and various other organisations including the West London Residents' Association and the Federation of Small Businesses. The London Borough of Hammersmith & Fulham stated that, as it is just outside the boundary of the zone, it has suffered from traffic displacement and increased pressure on parking spaces, as well as adverse impacts on local businesses.

The London Borough of Wandsworth said that there had been a negative effect on local businesses and motorists had not seen decongestion benefits from the charge. The London Borough of Westminster said that the removal of the Western Extension would particularly help Westminster residents who were not in either zone and highlighted that they had objected to the extension originally.

Option 3 Change the way that the scheme operates

Overall, 12% of respondents to the consultation preferred this option (13% of individual responses and 7% of business responses). A quarter of individuals living in the Western Extension and its buffer zones preferred this option, and 5% of businesses operating in this area preferred this option.

In the attitudinal surveys, 15% of Londoners and 14% of London businesses preferred this option. There was a fairly similar level of support for this option from residents in both the Western Extension and its buffer zones (18%) and the original charging zone and its buffer zones (16%).

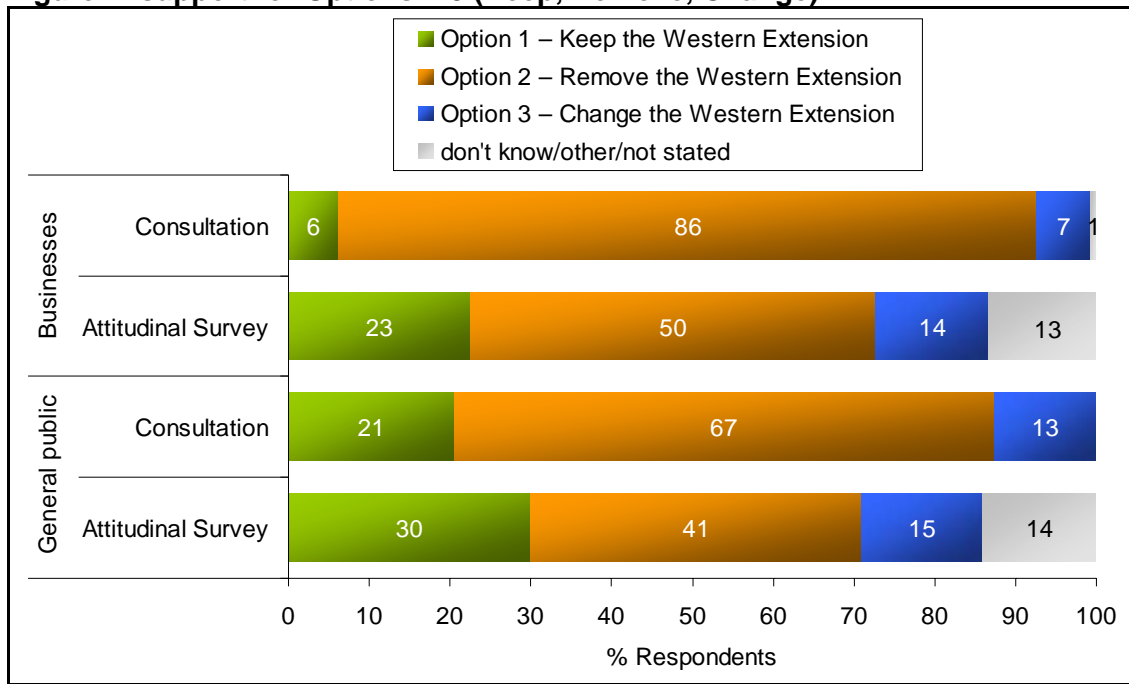
Respondents to the consultation and the surveys were also invited to describe other changes in the open text box. In most cases (57% in the consultation, 63% in the public survey and 54% in the business survey), no further comment was made. Where respondents did identify other changes, the most frequently-mentioned were changes to discounts and exemptions, and to the scheme boundary.

Around a third of stakeholders selected this option. In some cases, stakeholders selected this option as well as stating that the Western Extension should be retained (Option 1), and a number made their support for its retention conditional on one or more changes to the scheme. Several stakeholders said that the scheme should be changed so that there would be two separate Residents' discount zones. Other stakeholders commented on changes to the boundary (Murad Qureshi AM and Karen Buck MP) and changes to the discount and exemption categories. The Federation of Small Businesses (FSB) and the Freight Transport Association (FTA) said that businesses operating in the zone should be eligible for the Residents' discount; while the West London Residents' Association called for a general review of exemptions. Westminster City Council stated that charging hours should end at 1.00pm.

The City of London, the London boroughs of Islington and Southwark, and the Royal Borough of Kensington & Chelsea supported this option. Both the London Borough of Islington and the Royal Borough of Kensington & Chelsea said that there should be a comprehensive review of the Congestion Charging scheme, covering more than the future of the Western Extension.

The chart below summarises support for the three main options, by type of respondent (individual and business) in both the consultation and the attitudinal surveys.

Figure 2: support for Options 1-3 (Keep, Remove, Change)



Analysis of stakeholder responses to the three main options

Stakeholders almost always gave a more detailed response to the issues than individuals and businesses using the consultation questionnaire. While this is helpful in enabling TfL to gain a fuller picture of their issues and to inform the Mayor’s decision, it can make their responses more difficult to classify.

In particular, a number of stakeholders responding to this consultation linked support for the retention of the Western Extension with a preference for one or more changes to the scheme. A few said that they did not have an opinion on the main options, but commented on changes and improvements to the scheme. Where stakeholders listed changes which they would like to see made to the Western Extension (or the scheme as a whole), this may imply wanting to keep the scheme in some form. Other stakeholders were quite clear they wanted the scheme removed, whilst a fourth group proclaimed their neutrality.

The analysis shows that stakeholders generally are more supportive of the retention of the Western Extension *in some form* than for its removal. So whilst it is clear from individuals’ and businesses’ responses to the consultation that they want the Western Extension to be removed, the responses from stakeholders were more mixed. Thirty stakeholders expressed support for the retention of the scheme as it is, or changes to the scheme compared to twelve who supported its removal.

Stakeholders expressing support to retain the Western Extension in its present form (15)

- 1 British Heart Foundation
- 2 Campaign for Better Transport
- 3 Campaign for Clean Air in London
- 4 DPTAC
- 5 Friends of Capital Transport Campaign
- 6 Friends of the Earth
- 7 H Cohen MP
- 8 Institute of Advanced Motorists (IAM Trust)
- 9 Kensington & Chelsea Environment Roundtable
- 10 London Assembly Green Group
- 11 London Assembly Labour Group
- 12 London Cycling Campaign
- 13 Mary Honeyball MEP
- 14 Mobilise
- 15 Royal College of Nurses

Stakeholders expressing support for removing the Western Extension (12)

- 1 Association of British Drivers (ABD)
- 2 Chelsea and Westminster Hospital NHS Foundation Trust
- 3 City of Westminster
- 4 Federation of Small Businesses
- 5 Kensington and Chelsea Liberal Democrats
- 6 London Assembly Conservative Group
- 7 London Assembly Liberal Democrat Group
- 8 London Borough of Bexley
- 9 London Borough of Hammersmith & Fulham
- 10 London Borough of Islington
- 11 London Borough of Wandsworth
- 12 West London Residents Association

Stakeholders expressing support for changes to the Western Extension (15)

- 1 BVRLA
- 2 Campaign to protect rural England
- 3 CBI London
- 4 City of London
- 5 Freight Transport Association
- 6 Karen Buck MP
- 7 Knightsbridge Association
- 8 Living Streets
- 9 London Borough of Southwark
- 10 London First
- 11 London TravelWatch
- 12 Murad Qureshi AM
- 13 Royal Borough of Kensington & Chelsea
- 14 SMMT
- 15 London Borough of Camden

Stakeholders that were neutral on the Keep, Remove, Change options (6)

- AA
London Councils
Lord Hunt
RAC Foundation
London Borough of Havering
PATAS

A summary of the reasons why some stakeholders supported the retention, change or removal of the Western Extension is given below. More details are given in Chapter 3.

Several stakeholders commented that the Congestion Charge was important as part of a package of measures to encourage people to make sustainable choices in transport. Many highlighted that the removal of the Western Extension would result in increased traffic levels and congestion. In turn this could lead to increased emissions of air pollutants and CO₂. Others were concerned that the removal of the Western Extension would mean a significant and ongoing loss of revenues for investment in public transport.

Two stakeholders (the Royal Borough of Kensington & Chelsea and the London Borough of Islington) said that there should be a full review of the whole Congestion Charging scheme. Additionally, the Royal Borough of Kensington & Chelsea, the IAM Trust and the Kensington & Chelsea Environment Roundtable all stated that they needed more data on the Western Extension in order to inform their views on its future.

Among those clearly supporting its removal, a number drew attention to the views of businesses that the scheme had adversely affected the local economy. They also cited its perceived lack of success in reducing congestion, its impact on residents who receive visits from carers, access to services, and the financial cost it imposes on those who pay it. Several of those supporting the removal of the scheme did so because the Residents' discount applies across the whole extended zone, which was seen as potentially unfair and leading to increased congestion. The London Borough of Hammersmith and Fulham also cited poor levels of transport provision and increased pressure on parking in the area.

Options for changing the way that the scheme operates

In the questionnaire, respondents were asked to state how far they supported or opposed three specific options for changing the scheme, and the response to these options (3a – 3c) is described below.

While the three change options were primarily intended for respondents who selected Option 3, 'Change the way the scheme operates', it is notable that a sizeable proportion of those who preferred 'Keep the WEZ as it is' and 'Remove the WEZ' also stated that they supported one or more of the change options 3a, 3b and 3c. Overall, 29% of consultation respondents who preferred 'Remove' then went on to support one or more of the change options.

In considering the responses to Options 3a-3c, it is important to remember that consultation respondents could choose not to respond at all to the change options and for each of them the proportion 'not stated' is around a third. On the other hand, respondents could state support for more than one change option: 27% supported one; 18% supported two; and 9% supported three.

Option 3a Introduce an account-based payment system

Overall, this was ranked first of the three change options 3a-3c by both business and individual respondents to the consultation and second by individual and business respondents to the attitudinal surveys. 39% of individual respondents and 30% of businesses responding to the consultation supported this option. 42% of individual respondents living in the Western Extension and a quarter of Western Extension businesses supported this option. Support was stronger from consultation respondents in the original central zone than in either the Western Extension or other parts of London (64% of individual respondents and 46% of businesses in the OCZ).

In the consultation, this was the most popular change option with both respondents who first said that they preferred to Keep or Change the Western Extension (64% and 75% of those who went on to support a change option respectively).

In the attitudinal surveys, 53% of the public supported this option and 58% of London businesses supported this option. Again, support from both individuals and businesses in the OCZ (59% and 64% respectively) was stronger than those in WEZ (51% individuals, 54% businesses).

Twenty one stakeholders supported the introduction of accounts to make the charge easier to pay, including five London boroughs and London Councils, three motoring organisations and three business groups. The AA and Federation of Small Business called for accounts to be introduced across the extended zone and not just the Western Extension. However, London TravelWatch noted that this option could lead to increased congestion.

Option 3b Introduce a charge-free period in the middle of the day in the Western Extension

Overall this was ranked third of the three change options by respondents to both the consultation and the attitudinal surveys, although a bigger proportion of respondents to the surveys supported it than those responding to the consultation. In the consultation, 20% of individuals and 21% of businesses supported this option. In the surveys, 46% of Londoners and 40% of businesses supported this option. In the consultation, 19% of WEZ residents supported it (compared to 37% in the attitudinal survey), and 19% of WEZ businesses (compared to 40% in the attitudinal survey of businesses).

There was scant support from stakeholders for this option, although some said that there would need to be further information to help them form a view (London Councils suggested a preliminary trial). A number raised concerns about the potential complexity of this option and that it might cause confusion and possible surges in traffic as drivers attempted to leave the zone as the charge-free period ended. While expressing reservations about complexity, the Royal Borough of Kensington & Chelsea noted that this option could offer benefits to some businesses and residents in the Western Extension. The City of London, and the London boroughs of Camden, Southwark and Islington opposed this option. Westminster City Council also opposed this option and stated that charging hours should end at 1.00pm.

Option 3c Increase the Residents' discount from 90% to 100%

Overall this was ranked second of the three change options by both individual and business respondents to the consultation (supported by 30% of individuals and 24% of businesses) and first by both individual and business respondents to the attitudinal surveys. Support was generally stronger in the attitudinal surveys: 66% of businesses and 68% of individuals supported it. Residents of the WEZ/WEZ buffer in both the consultation (54%) and attitudinal survey (75%) were more likely than residents elsewhere to support this option.

Eight stakeholders supported this option, including CBI London and the GLA Labour Group, although support was often conditional on other changes. A number of stakeholders made comments with regard to the separation of the Western Extension and the original central zone, some stating that the Residents' discount should be adapted for each zone.

Twelve stakeholders did not support this option, including a number of transport and environment organisations. Environmental organisations often commented on the likely impact of this option in terms of increased private car use and vehicle emissions. London TravelWatch objected to any increase to the Residents' discount because it could act as a disincentive to residents to reduce their reliance on private car use. The West London Residents Association (WLRA) and London First also opposed this option.

The City of London opposed this option and said that there should be two Residents' discount zones, with the discount only applying in the zone in which the resident lives, because this would reduce the amount of traffic entering the City from the west. The London Borough of Camden also stated that the Congestion Charging zone should operate as two discount sub-zones for residents to discourage car journeys across the zones by residents. The London Boroughs of Southwark and Islington supported the current situation where residents are eligible for a 90% discount.

The Royal Borough of Kensington & Chelsea supported this option and said that if the Western Extension was removed, its residents should continue to receive the Residents' discount for a transitional period of up to ten years. The City of Westminster supported this option provided that a 100% Residents' discount was available to all residents of the borough.

7. Recommendations and Next Steps

The Mayor made very clear his commitment to listening to the views of Londoners about the future of the Western Extension and abiding by the results. This informal consultation was an opportunity for the public and businesses to make their views known.

The results show a strong overall preference for the scheme to be removed.

The majority of the public and businesses who responded to the consultation supported the removal of the Western Extension. Those living or based within the zone have a strong preference for it to be removed – more than half (57%) of WEZ residents, and 89% of businesses in the WEZ, responding to the consultation supported the removal of the western Extension.

The attitudinal survey conducted alongside the consultation also showed a preference among both public and businesses for removing the Western Extension. While this was not as strong as in the consultation itself, it was still the most preferred option, supported by 41% of individuals and 50% of businesses.

Views from stakeholders were more mixed, with more supporting keeping or changing the scheme than removing it.

On the basis of these results it is recommended that the Mayor express that he is minded to remove the Western Extension and that he takes the necessary next steps to do so.

In doing so, the Mayor has to be mindful of his responsibilities for reducing congestion and emissions, and so ensure that measures to mitigate any increases in these, that may be likely as a result of removing the Western Extension, are also taken.

Therefore we would recommend that the removal of the Western Extension is taken forward as part of a broader revision of the Mayor's Transport Strategy to enable proper consideration to be given to mitigating the impacts and ensuring, overall, a package of policies which on balance is positive for transport, the environment, health and sustainable development.

The timing for the potential removal of the Western Extension also needs to be considered in relation not only to what mitigation measures can be put in place, but also how quickly. This should be addressed as part of the broader approach to transport and the environment which is provided by the Transport Strategy and the Mayor's other strategies.

TfL has already begun tackling congestion through enhanced road and traffic management, and there is scope for this approach to be expanded, for example by re-phasing traffic lights to improve traffic flow. A number of schemes have also been put in place which will help to reduce the number and duration of road works. We would recommend that the application of these measures should be prioritised for implementation in the Western Extension area in anticipation that the scheme will be removed. Furthermore, with regard to emissions, a number of initiatives which improve air quality and reduce CO₂ emissions from road transport are already in place. The continuing contribution of these initiatives – and what more can be done – needs to be considered further, in the anticipation of the scheme being removed, and as part of the development of the Transport Strategy and the Mayor's other Strategies.

In addition, the Mayor will need to consider how the loss of the substantial net revenues from the Western Extension could be offset in the TfL Business Plan and how such mitigation measures that need to be introduced can be funded.

As well as a revision of the Transport Strategy, removal of the Western Extension will also require a formal variation to the Congestion Charging Scheme Order. These both involve statutory procedures, including public consultation which cannot be pre-judged.

In practical terms, the Western Extension could not be removed until spring 2010 at the earliest. This timescale reflects the need for these statutory procedures. This will also allow time to address the issues as set out above. In addition, this timescale takes account of the transfer of Congestion Charging scheme operations to a new service provider in order to guarantee that any changes would be made in the most economical and efficient way and to ensure the greatest value for Londoners' money.

The consultation herein also considered possible changes to the Congestion Charging scheme which the Mayor may still want to consider applying to the original zone even if he wishes to take forward a formal consultation on removing the Western Extension. Of the specific change options proposed, an account-based payment system emerged as a popular option and a number of stakeholders said that they favoured this regardless of whether the Western Extension was removed. It was also the most favoured change option by both business and individual respondents to the consultation, despite some concerns about privacy and security of data.

There would be additional financial implications of introducing accounts in the original zone over and above the reductions in net revenue associated with the potential removal of the Western Extension. This would create additional pressures in the TfL Business Plan and reduce the monies available for investment in transport in London. The benefits to users from accounts, for example in terms of reduced "hassle" and fewer PCNs, must be weighed against this.

The Mayor must give all these factors careful consideration before confirming how he is minded to proceed.

Chapter 2: The Consultation Process

Consultation on the Future of the Western Extension

The Mayor of London, Boris Johnson was elected on 1 May 2008. One of his manifesto commitments was to hold a consultation on the future of the Western Extension. This report summarises the results of this consultation, which ran for five weeks from 1 September to 5 October 2008.

This chapter provides details of the consultation carried out by Transport for London (TfL). More information about the context of this consultation and how it might fit into subsequent, formal procedures is provided in Chapter 4.

This exercise differs from most previous consultations on the Congestion Charging scheme because it is informal and non-statutory. It presented a range of options for changing the scheme, rather than consulting on a specific proposal set out in a formal variation order. This approach reflected the Mayor's wish to listen to the views of Londoners before deciding how to proceed with any formal changes. Any major changes resulting from the consultation would still be required to be consulted upon formally before being implemented.

The consultation sought to maximise the use of lower cost approaches to consultation, while ensuring that a wide range of people could participate. For example, leaflets were delivered on request to minimise distribution costs, and advertising was placed in publications which offered the most cost-effective way to reach Londoners. Where practicable, TfL contacted stakeholders by email and provided links to consultation documents on the website to avoid printing and postage costs. Further information on the approach to the consultation is given below.

Informing Londoners about the consultation

Information Leaflet and questionnaire

TfL produced a 20 page information leaflet entitled 'Have Your Say on the Future of the Congestion Charge Western Extension.' This provided summary information on the options, background information on the scheme and summary information about the likely impacts of the options. The questionnaire listed the options and also provided space for respondents to describe other changes they would like to see to the Western Extension. The questionnaire could be returned to TfL using the pre-paid addressed leaflet, which could also be used for returning letters or additional comments. The leaflet and questionnaire are included in Appendix 1.

The leaflet was available on request from a dedicated call centre, and bulk copies of the leaflet were delivered to organisations on request. Translations were available in the following languages: Arabic, Bengali, Cantonese, French, German, Greek, Gujarati, Hindi, Italian, Polish, Punjabi, Spanish, Tamil, Turkish and Urdu. The leaflet was also available on request in large print and on audio CD.

The information contained in the leaflet, including an online version of the questionnaire was also available on the TfL website, from where a pdf of the leaflet could be downloaded.

The call centre received over 1,300 requests for individual leaflets and fulfilled requests for over 26,000 leaflets via bulk requests. At their request, the City of Westminster and the Royal Borough of Kensington & Chelsea were sent bulk copies of the information leaflets, for their own distribution.

Supplementary Information

More detailed information to support the consultation was provided in a 30 page Supplementary Information document, which was put on TfL's website at the start of the consultation. This included further information on the potential impacts of the options and concepts presented in the consultation, including: traffic and congestion impacts; business and economic impacts; social impacts; and environmental impacts (such as on levels of vehicle emissions). It also included information on the performance of the Western Extension, and its impact to date. It was downloaded 687 times. The Supplementary Information is included in Appendix 1.

Website

At the start of this consultation, TfL published information on a dedicated area of its website: www.tfl.gov.uk/westernextension. The following information and documents were available:

- Summary information about the options presented
- Summary information about the potential impacts of the options on drivers and for London generally
- Supplementary information (as a downloadable pdf)
- Information leaflet including postage-paid questionnaire (and translations of the leaflet)
- An online questionnaire for public, business and other organisations

In total, there were over 81,000 visits to the www.tfl.gov.uk/westernextension site in the course of the consultation period.

Telephone helpline

A telephone number, 0844 415 4425 for TfL's call centre (managed by a third party, Granby Marketing Service), was provided in the information leaflet, on TfL's website and in print media and radio advertising. Anyone with queries about the consultation could phone the consultation call centre for information, with more complex queries escalated to TfL. The consultation call centre also fulfilled requests for information leaflets.

A total of 1,743 calls were made to the call centre over the course of the consultation period, including requests for leaflets and requests for further information.

Media and Advertising

TfL ran an advertising campaign to raise awareness of the Western Extension consultation and to encourage people to have their say using a combination of cost effective media. Advertisements were placed in the London Lite evening newspaper, Metro, and in local London press titles, including the London Informer series which comprises titles such as the Hammersmith and Fulham Informer and the Kensington & Chelsea Informer. Advertisements were also placed in ethnic newspaper titles. A radio advertisement ran on major London radio stations, including Capital, Magic and Heart.

The attitudinal survey revealed fairly high awareness among Londoners in general (and particularly among residents of the charging zone) that a consultation was taking place on the Western Extension, suggesting that coverage had been relatively successful.

Surveys of Londoners and London businesses

Consultations tend to elicit views from those with strong opinions or who feel most directly affected by the issue, and it is important to understand how representative these views are of the wider population.

Therefore, TfL commissioned an attitudinal survey of 2,000 Londoners and 1,000 businesses alongside the public consultation. This was designed to complement and inform the outcome of the public consultation by providing a representative view of specific groups, residents and businesses inside and beyond the original charging zone and Western Extension and London as a whole. The second annexed report gives details of the survey of Londoners, and the third annexed report gives details of the survey of London businesses.

Stakeholder engagement

At the start of the consultation, TfL emailed some 300 stakeholders alerting them to the consultation and inviting them to respond either by email to westernextension@tfl.gov.uk or by letter. The email contained summary information about the consultation and a link to the website, from where more detailed information could be obtained.

TfL also offered meetings to a range of stakeholders who were most directly affected by the potential changes to the Western Extension. The types of stakeholders contacted are listed below. Summaries of responses from all the stakeholders who responded to the consultation are given at Appendix 3; a full list of stakeholders who were contacted is provided in Appendix 2.

Key Stakeholders (total 48)

Business Representative Organisations	4
Freight/Haulage Representative Organisations	1
GLA Functional Bodies	1
Local Government Associations	1
London Boroughs (boroughs in and around the Congestion Charging zone)	11
Motoring Organisations	2
Non-departmental Public Bodies	4
NHS Greater London	22
Transport & Environment Representative Groups	2
Total	48

The Government group includes the following London Boroughs: Camden, City of Westminster, Corporation of London, Hackney, Hammersmith & Fulham, Hackney, Islington, Lambeth, Royal Borough of Kensington and Chelsea, Southwark and Tower Hamlets. Members of the Greater London Assembly are also included.

Other Stakeholders (total 262)

Black, Asian & Minority Ethnic Representative Organisations	1
Business Representative Organisations	11
Central Government Departments	5
Children & Young People	1
Disability & Mobility Groups	5
Economic & Regeneration Partnerships	1
Emergency Service Providers	10
Freight/Haulage Representative	2
GLA Functional Bodies	8
GLA Members	25
Health Organisations	10
London Boroughs	23
London Political Representative Organisations	5
Motoring Organisations	3
MP/MEPs Greater London	80
Non-departmental Public Bodies	6
NHS Greater London	16
Older People	1

Professional Organisations	6
Public Transport Operators	6
Regional Government	2
Organisations Representing the Voluntary And Community Sector	3
Residents' Associations	1
Trade Associations	5
Trade Unions	2
Transport & Environment Representative Groups	17
Utilities	7
Total	262

TfL held meetings with a number of stakeholders, details of which are listed below.

Organisation	Date
Royal Borough of Kensington & Chelsea	11 July & 13 Aug 2008
Westminster City Council	18 July 2008
London TravelWatch	10 Sept 2008
RAC Foundation & IAM Motoring Trust	24 Sept 2008
Andrew Slaughter MP	26 Sept 2008
Kensington & Chelsea Environment Round Table & Campaign for Better Transport (joint meeting)	30 Sept 2008
London Borough of Hammersmith & Fulham (public meeting)	1 Oct 2008

TfL also attended a meeting of London Councils on 12 September, which included a briefing to the London boroughs about the consultation. The following boroughs were in attendance: City of London, Wandsworth, the City of Westminster, Royal Borough of Kensington & Chelsea, Tower Hamlets, Camden, Hammersmith & Fulham, Islington, Southwark and Greenwich.

Analysis of Responses and Late Responses

Public, businesses and other organisations

The consultation closed on 5 October 2008. TfL commissioned Accent, the market and opinion research company, to analyse the public, business and other organisation responses. Online questionnaires received up to midnight on Sunday 5 October, and paper questionnaires, emails and letters received up to 7 October are included in the first annexed report. In addition, Accent received two petitions.

Responses received from the public, businesses and other organisations after this date and before preparing this report were analysed by TfL, and a summary of these responses is provided at Appendix 4.

Responses analysed by Accent (up to 7 October 2008)

	Number received
Online questionnaire	21,292
Paper questionnaire	6,207
Open responses (letters, emails)	78
Total	27,577

Responses analysed by TfL (received after 7 October 2008)

	Number received
Online questionnaire	N/A
Paper questionnaire	265
Open responses (letters, emails)	8
Total	273

A high volume of responses was received to the consultation, particularly to the online questionnaire for which there were more than 20,000 submissions. The high level of interest and engagement is not surprising, and is to be welcomed, but it should be noted that because of the open nature of the consultation, it was possible for interested parties to make multiple submissions.

Multiple responses

In any consultation, it is likely that responses will most often come from the individuals and groups which feel most strongly about the issue under discussion. It is also possible that motivated respondents could make multiple submissions.

TfL did not design the online questionnaire in such a way as to prevent multiple submissions – either from individual computers or from individual email addresses. Even if it were desirable to do so, preventing multiple submissions from either the same IP address (a number which identifies computers using the internet) or the same email address would not have acted as a failsafe. Large organisations often use the same IP address for a number of computers, and of course many people will use shared computers at libraries and internet cafes. And a family, for example, may share one email address, but submit different views from different members.

Similarly, TfL did not seek to limit the number of questionnaires sent on request to individual members of the public, although judging by the numbers of questionnaires returned to TfL, and the greater effort involved in making submissions by post, it would seem less likely that these were used for multiple responses.

However, as a consequence of the unrestricted access to the online questionnaire, some individuals or groups may have been more readily able to influence the outcome of the public consultation. While it is unlikely that there has been a material effect, it is important to bear this in mind when considering the results from the public consultation. It may be particularly valuable, therefore, to consider the views of Londoners and London businesses as captured by the two attitudinal surveys alongside the responses to the consultation.

Stakeholder Responses

Responses received from stakeholders before 30 October were analysed by TfL, and each response is summarised in Appendix 3. Both public and stakeholder responses are considered in Chapter 3. Responses received from the public and stakeholders after 30 October were forwarded to the Mayor; TfL's analysis of these is included in Appendix 4.

Chapter 3: Summary and Analysis of Responses Received

Responses to the consultation and the attitudinal surveys

This chapter considers responses both to the three main options: Option 1 – Keep the Western Extension as it is; Option 2 – Remove the Western Extension; and Option 3 – Change the Western Extension) and the three options for changing the scheme (Option 3a – Introduce accounts; Option 3b – Charge-free period in the middle of the day in the WEZ; and Option 3c – Increase the Residents' discount to 100%). Each is considered in turn, covering responses from both the consultation and the attitudinal surveys of Londoners and London businesses. In each section there is also a summary of stakeholder responses to the option, and a specific section on the comments made by boroughs in and around the Congestion Charging Zone.

The information here is presented as a summary. For more information, an analysis of the consultation responses is provided in the first annexed report. The public attitudinal survey analysis is presented in the second annexed report; and analysis of the business survey is presented in the third annexed report. These reports include copies of the surveys. Summaries of stakeholder responses can be found at Appendix 3.

The Consultation

Respondents to the consultation using the questionnaire were asked to state if they were responding in an individual capacity or as a representative of a business. The vast majority (90%, 24,803) identified themselves as individuals, with only 9% (2,390) stating that they were responding as a business.

In this chapter, results are given for all consultation respondents (individuals and businesses combined) and also for individual and business respondents separately. Where appropriate, results from particular areas are also given. On the questionnaire, businesses were asked to state if they operated in the Western Extension, the original central zone or elsewhere in London. Individual respondents were asked for their home postcode and, on the basis of this, were allocated to areas within or outside London. The following two tables show the numbers of questionnaire responses received for individuals and businesses, by area:

Individual respondents: by area of residence

	Number	Percentage
WEZ/WEZ buffer – People living within the Western Extension area and within the area immediately adjacent to the Western Extension boundary who are eligible for the Residents' discount	5,071	20%
OCZ/OCZ buffer – People living within the original charging zone and also within the area immediately adjacent to the original charging zone boundary who are eligible for the Residents' discount	459	2%
Rest of London – People living outside both the original charging zone and the Western Extension	15,456	62%
Outside London – People living outside the capital	922	4%
No/insufficient postcode	2,895	12%
Total	24,803	

Those not giving a sufficient postcode are included in the 'all individuals' figure, but not in any area figure.

Business respondents: by area of operation

	Number	Percentage
The Western Extension	1,355	57%
The original charging zone	322	13%
Rest of London (not in Congestion Charging zone)	462	19%
Outside London	82	3%
No response	169	7%
Total	2,390	

The attitudinal surveys

In addition to describing results from the consultation, this chapter summarises the findings from the two attitudinal surveys. TfL commissioned two surveys: of Londoners (2,000 members of the public); and London businesses (1,000 businesses), in order to provide a representative sample of views across London.

In the attitudinal survey of 2,000 Londoners, residents of the following four areas were surveyed:

- Residents of the original central zone and its 'designated' buffer zones (referred to as OCZ/OCZ buffer)
- Residents of the Western Extension and its 'designated' buffer zones (referred to as WEZ/WEZ buffer)
- Residents of a 5-mile 'ring' in Inner London surrounding the entire Congestion Charging Zone
- Residents of the rest of London.

An 'All London' group which is representative of London as a whole was produced from these four samples.

In the attitudinal survey of 1,000 London businesses, businesses in the Western Extension, the original central zone and in the rest of London were surveyed. As for the survey of Londoners, these three samples were used to produce an additional 'London businesses' group.

The questionnaire

Respondents to the consultation and the surveys were asked to comment on the same options for the future of the Western Extension. In considering the response to these questions, it is important to bear in mind the different types of response options presented for each. The three main options (Option 1 – Keep the Western Extension as it is, Option 2 – Remove the Western Extension and Option 3 – Change the way that the scheme operates) were intended as preference options, with the respondent invited to select only one of the three. In contrast, the three change options (3A- accounts, 3B- charge-free period and 3C- Increase Residents' discount) were presented with six possible response options: Strongly support, Support, Neither, Oppose, Strongly Oppose and Don't know. In this report, the sum of the proportions stating 'strongly support' and 'support' is used, as is the sum of 'oppose' and 'strongly oppose'. A full breakdown is given in the Annexed reports on the consultation and surveys (annexed reports 1, 2, and 3).

It is also worth commenting on the relationship between the 'Keep, Change, Remove' options and the three options for changing the scheme. While it was anticipated that only respondents who opted for Option 3 (Change the way that the scheme operates) would then choose to support one or more of the three change options, this was not always the case. Overall, 29% of respondents to the consultation who preferred Option 2 – Remove the Western Extension then went on to say they supported or strongly supported one or more of the change options.

Comparing findings from the consultation and the attitudinal surveys

Although the main questions were the same, there are some important considerations to note in comparing the findings from the consultation and the surveys.

Firstly, while both consultation and survey respondents were offered the same possible response options, consultation respondents were more easily able to disregard questions where they did not wish to register a view. Respondents to the surveys were introduced to each question in turn, and so had less opportunity to disregard questions, although they were still able to choose the 'don't know' or 'neither' responses. In practice, this means that for the change options 3a, 3b and 3c, there is a relatively large proportion of 'no answer stated' responses for consultation respondents, whereas survey respondents were more likely to state their level of support or opposition.

Respondents to both the consultation and the attitudinal surveys were free to state their level of support for more than one of the three options for changing the scheme, and in the case of the attitudinal surveys were specifically asked to do so. As has already been described, consultation respondents were more likely to select which questions to answer, and a relatively large proportion (47% overall) of consultation respondents did not respond to the three change options at all. But 18% of consultation respondents stated that they supported or strongly supported two of the change options, and 9% all three of the change options. Just over a quarter (27%) of all consultation respondents supported one of the change options.

Secondly, the surveys offered the opportunity to capture more information about respondents, in order to better understand their responses. Again, while consultation respondents were also asked for some information about themselves (such as gender, postcode, and in the case of businesses, where the business operated), these questions could easily be disregarded, and, to ensure the questionnaire was an acceptable length, these questions were kept deliberately few in number. More detailed questions about the respondent were included in the surveys, such as usual mode of transport, for example. Some of this information from the surveys is included in the sections 3.1 to 3.6 below; more detailed information is provided in the reports on the attitudinal surveys in the second and third annexed reports.

In the consultation, respondents were asked whether they drove in the Congestion Charging Zone (CCZ) during charging hours (Monday to Friday 7.00am to 6.00pm), and if so, how often. In the attitudinal survey, members of the public were asked if they drove in OCZ and WEZ during charging hours, and if so, how often. The same categories for frequency of driving were used in both the consultation and the attitudinal survey. In the following section, there are figures given for drivers and non-drivers' responses to the options for the scheme. To understand these figures, it may be useful to outline how respondents to the consultation and survey responded to the question about driving in the zone.

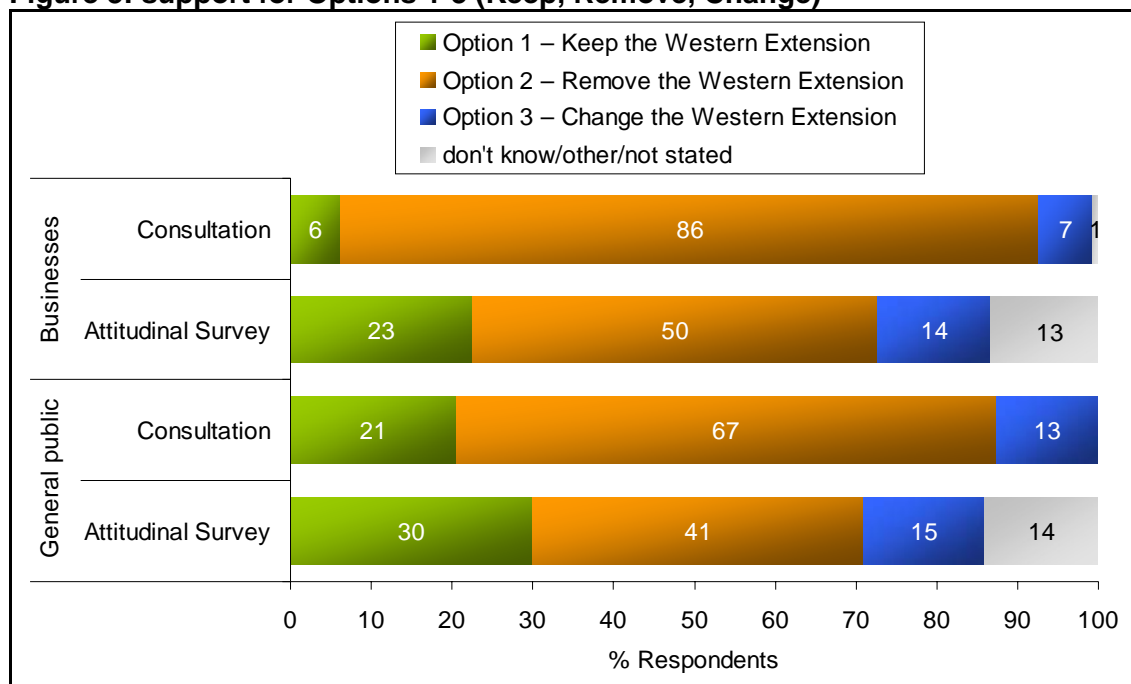
Respondents to the consultation were much more likely than survey respondents to report that they drove in the CCZ. Eighty two per cent of all consultation respondents said that they ever drove in the CCZ, (the sum of all frequencies ranging from 5 days a week to less often than once or twice a year). Only 13% said that they never drove in the CCZ and the remainder did not answer or said they did not know. In the attitudinal survey, only 30% of Londoners said that they ever drove in the OCZ during charging hours, and 21% said they ever drove in the WEZ during charging hours. A much greater proportion of survey respondents said that they never drove in OCZ (70%) and WEZ (78%) during charging hours. This difference suggests that those who drive in the zone are over-represented in the consultation respondents, compared to the Londoners surveyed for the attitudinal survey. In the following sections, 'drivers' refers to those who say that they ever drive in the zone.

The surveys also provided an opportunity to ask some further questions about the respondents' views, in addition to those questions set out in the consultation. Survey respondents who said that they opposed or strongly opposed any of the change options 3a, 3b or 3c were invited to state their reasons for this opposition. The key findings from this question are included in the relevant sections below. These additional questions were intended to provide TfL with a better understanding of why respondents reported particular views and could potentially be used to inform future work were any of the options for changing the scheme to be pursued.

Survey respondents were also asked whether – prior to being contacted for the survey – they were aware of the consultation on the future of the Western Extension. In the survey of Londoners, more than half (56%) said that they were aware or vaguely aware of the consultation; this proportion rose to 67% amongst people living in the Western Extension and its buffer zones. For businesses, 63% of London businesses reported that they were aware of the consultation and again, this proportion was higher amongst businesses in the Western Extension (73%).

The chart below summarises support for the three main options, by type of respondent (individual and business) in both the consultation and the attitudinal surveys. Similar charts for each of the change options are provided in Sections 3.4, 3.5 and 3.6 below.

Figure 3: support for Options 1-3 (Keep, Remove, Change)



Section 3.1 – Keep the Western Extension

Description of this option

The Western Extension would remain in place and continue to operate as it does at present: an £8 daily charge for using or keeping a vehicle on public roads within the Congestion Charging zone Monday to Friday, 7.00am to 6.00pm.

The range of discounts and exemptions would remain the same: for instance for Blue Badge holders. The 90% Residents' discount would continue to apply throughout the extended zone.

Responses to this option

Consultation responses to this option

- Overall, 19% of all respondents to the consultation (individuals and businesses combined) chose this option.
- 21% of individual respondents to the consultation chose this option.
- 19% of residents in the Western Extension and its buffer zones preferred keeping the Western Extension, compared to 46% of residents in the original charging zone and its buffer zones.
- 6% of business respondents opted to keep the Western Extension.
- 4% of businesses respondents operating in the Western Extension chose this option.

- 16% of respondents who drive in the Congestion Charging zone (including the Western Extension) opted to keep the Western Extension, compared to 45% of respondents who do not drive in the Congestion Charging zone.

Responses to this option in the attitudinal surveys

- Overall, 30% of members of the public surveyed chose this option.
- Of people living in the Western Extension or its buffer zones, 27% opted to keep the Western Extension.
- 28% of people who drive in the Western Extension opted to keep the zone. This is not a significantly different level of support from the 31% of people who do not drive in the Western Extension who opted to keep the zone.
- 39% of cyclists selected keeping the Western Extension (it was the most popular of the three options for this group), compared to 29% of car drivers.
- 27% of Western Extension residents registered for the Residents' discount wanted to keep the zone.
- 23% of London businesses surveyed selected this option. This is significantly higher than the 6% of businesses responding to the consultation which selected this option.
- 18% of businesses surveyed based in the Western Extension opted for keeping the Western Extension.

Stakeholder responses to this option

- 23 of the 48 stakeholders which responded to the consultation preferred to keep the Western Extension (this includes some stakeholders who said both keep and change).
- These included all five transport campaigning groups and all four environment groups which responded to the consultation.
- Other stakeholders which preferred this option included two health stakeholders (the Royal College of Nurses and the British Heart Foundation), two organisations that represent disabled people (DPTAC and Mobilise), three political representatives (H. Cohen MP, K. Buck MP and M. Honeyball MEP), two London boroughs (Southwark and City of London), two London Assembly political groups (Labour and Green), one business group (London First), one driving organisation (IAM Trust) and one residents' group (the Knightsbridge Association).
- Eight of the stakeholders which preferred to keep the Western Extension also felt that the Western Extension and the original central London Congestion Charging zone should operate as two separate zones. These included the City of London, London First and London TravelWatch. The main reason for this was to reduce congestion caused by residents of one zone being able to use their 90 per cent discount to drive in the other.
- The Campaign for Clean Air in London stated that the Western Extension should remain in place, given the statutory duty on the Mayor to take action to meet limit values for air quality. Without the Western Extension in place, there would be increased traffic levels and vehicle emissions which would necessitate other measures to address air pollution.
- The London Assembly Green Group said that London is already in breach of EU limit values for PM₁₀; and that any rise in traffic levels as a result of the removal of the Western Extension could lead to increased air pollution and CO₂ emissions.
- Lord Hunt (Minister of State, DEFRA) did not state a preferred option, but noted that there would be negative consequences for air quality if the Western Extension were removed.
- Two stakeholders (the London Cycling Campaign and the Kensington and Chelsea Environment Roundtable) argued that the Western Extension should be retained as part of a package of measures to encourage a shift to more sustainable modes of transport such as cycling and walking.

Responses from boroughs in and around the zone

The Royal Borough of Kensington and Chelsea said that on balance an argument could be made for retaining the Western Extension, though with mitigation of some of its more unappealing features. In addition, the Council wanted to see the views of borough residents and businesses as expressed in TfL's consultation before reaching a final view.

The Royal Borough also noted that the reduction in traffic achieved by the Congestion Charging scheme has enabled visitor parking bays to be reassigned to other uses – for instance for car clubs and motorcycle bays. It also plans to put cycle parking in four more under-used bays but state that its ability to find further bays for these uses or for a cycle hire scheme would be very much reduced were demand for visitor parking to rise again as a result of the removal of the Western Extension.

The Royal Borough said that the Western Extension had brought some benefits to residents including easier parking and the ability to drive in the original zone at a discounted rate. It was important to note that Congestion Charging had reduced traffic levels in the Western Extension, as this suggested that it was doing its job of restraining demand for roads space as well as bringing about environmental and residential amenity benefits.

Residents and businesses had also benefited from the improved bus services that were introduced just before the Western Extension was introduced.

In addition, the Royal Borough stated that the reduction in demand for visitor parking had enabled the Council to reallocate visitor parking spaces to car clubs, disabled people and motorbikes, with further related schemes planned to promote sustainable travel. Were the Western Extension to be removed and demand for visitor parking to increase again, some of these improvements might have to be reversed. However, the Royal Borough also stated that the benefits resulting from Congestion Charging had come at a cost, with residents now having to pay £200 (roughly the cost of an annual Residents' discount payment) to drive in their own borough, there were increased costs for businesses, and as a result of less revenue from visitor parking, the Council had reduced income to spend on transport projects.

The London Borough of Southwark preferred the retention of the Western Extension, as it had brought about congestion relief and broader social and environmental benefits across central London. The council also felt that should the Western Extension be removed, the funding that would be lost for public transport improvements within London would be significant and smaller schemes with local impacts would suffer most. It said that removal of the Western Extension could set a precedent for the piecemeal degradation of the central zone.

The London Borough of Camden wanted steps to be taken to ensure the benefits achieved from the original charging zone are not eroded if the Western Extension is retained.

The City of London conditionally opted for the Western Extension to be retained. Removal of the Western Extension would result in a loss of income for transport improvements in London and could impact on the delivery of other public transport schemes that would be of benefit to the City. However, this choice was conditional on the introduction of two separate Residents' discount zones, which would still allow residents to benefit from discounted entry into their specific zone but which would provide an obstacle for those residents travelling between the two zones.

Section 3.2 – Remove the Western Extension

Description of this option

The Western Extension of the Congestion Charging zone would be removed, returning the Congestion Charging zone back to its original size with its original pre-2007 boundaries. This would be subject to the statutory processes that would be necessary if the scheme were to be removed and the earliest this could be delivered would be spring 2010.

The original zone would continue to operate, with a charge of £8 per day to drive within the zone Monday to Friday 7.00am to 6.00pm. There would no longer be any charge to drive in the area that used to be the Western Extension.

Residents of the Western Extension zone, and those residents living just outside the Western Extension zone who became eligible for the Residents' discount when the Western Extension was introduced, would no longer be eligible for a 90% discount and would be liable for the £8 daily charge to drive within the original central zone.

All existing discounts and exemptions would still apply in the original Central London zone. Only residents living within the original charging zone (and those residents just outside the original charging zone who are eligible) would qualify for the 90% Residents' discount.

Responses to this option

Consultation responses to this option

- Overall, 69% of respondents to the consultation preferred this option (67% of individual respondents; 86% of business respondents).
- 57% of people living in the Western Extension and its buffer zones wanted to remove the Western Extension, whilst 33% of residents in the original charging zone and its buffer zones selected this option.
- 89% of businesses respondents operating in the Western Extension opted for this option.
- 72% of respondents who drive in the Congestion Charging zone (including the Western Extension) supported the removal of the Western Extension, compared to 42% of the respondents who do not drive in the Congestion Charging zone. The most popular option among those who do drive in the zone is to remove it.

Responses to this option in the attitudinal surveys

- Overall, 41% of Londoners surveyed wanted the Western Extension removed.
- Amongst those living in the Western Extension or its buffer zones, 48% opted for this option.
- 46% of those who drive in the Western Extension chose this option, as did 38% of those who say they never drive in the Western Extension
- 34% of cyclists opted for the removal of the Western Extension, while 43% of car drivers selected this option.
- 52% of Western Extension residents registered for the Residents' discount chose to remove the zone.
- 50% of London businesses surveyed opted for this option. This is significantly lower than the 86% of businesses responding to the consultation which preferred this option.
- 59% of businesses surveyed based in the Western Extension opted for removing the Western Extension.

Stakeholder responses to this option

- 12 stakeholders preferred this option, including both the London Assembly Conservative group and the Liberal Democrat group, four boroughs within and around the zone (London Borough of Hammersmith and Fulham, London Borough of Islington, London Borough of Wandsworth and City of Westminster), and various other organisations including the West London Residents' Association and the Federation of Small Businesses. The London Borough of Bexley also supported this option.
- 20 stakeholders stated that they were opposed to this option, including the London Assembly Labour Group, four environmental groups, two groups representing the interests of disabled travellers, and the London borough of Southwark.
- The West London Residents' Association stated that "congestion in the Western Extension only occurs along a few main roads from time to time. These congested roads make up about 5% of the total road length within the Western Extension."
- The Chelsea and Westminster Hospital NHS Foundation Trust said that the scheme as it stands disadvantages its patients and staff and it would therefore support the removal of the Western Extension.

Responses from boroughs in and around the zone

Support/Opposition

The London Borough of Hammersmith & Fulham stated that it “opposed the extension before its introduction and experience since the scheme's introduction has confirmed [their] opposition.”

Westminster City Council supported the removal of the Western Extension.

The London Borough of Wandsworth stated that it preferred the removal of the western extension.

Traffic and environmental impacts

The London Borough of Islington commented that “removing the opportunity for residents living in the Western Extension to drive for only 80p a day will see a reduction in traffic in central London, with resulting decreases in congestion, air pollution, and carbon emissions.”

While the Royal Borough of Kensington & Chelsea’s “own traffic surveys show reductions in traffic similar to those of TfL's surveys”, it went on to say that “on TfL's own figures, journey times in the latter part of 2007 had returned to the average levels seen prior to the implementation of the Western Extension” which makes it hard “to see it as an unqualified success”. The Royal Borough believes, however, that the “benefits of reduced traffic levels are important” and that “data suggests that Congestion Charging is succeeding in restraining demand for roadspace”. The Royal Borough of Kensington and Chelsea commented that “TfL's Supplementary Information suggests that if the Western Extension was removed, congestion would be significantly worse than it was before the Western Extension – between 15% and 25% worse than now”. The Royal Borough went on to say that the results from TfL's model on a scenario in which most of the recent losses in network capacity would be reversed need to be provided before TfL can formally consult on removing the scheme.

The London Borough of Hammersmith & Fulham stated that as they are just outside the boundary of the Western Extension, they “were always going to suffer the boundary effects of traffic displacement”. The London Borough commented that “TfL's own figures show that Hammersmith & Fulham's roads are the most congested in London” and the borough mentioned that they have “a limited number of highly congested north-south roads”. Hammersmith and Fulham stated that “TfL's figures do not show benefits inside the zone, where congestion is now returning to pre-congestion charge levels” and that this outweighs the disadvantages.

While the London Borough of Wandsworth acknowledged “the positive benefits of the charge”, it stated that “motorists have seen little congestion benefit for their money which must be the key criteria for measuring its performance.” They stated that “the performance of the traffic signal network and red route network is the responsibility of TfL, and TfL must, therefore, take some responsibility for any failure to minimise and mitigate road works and traffic congestion on the main roads”.

Business and economy impacts

The Royal Borough of Kensington & Chelsea stated that it is concerned about the negative business impacts of the Congestion Charge expressed by some traders, in particular those on Portobello Road. However, the Royal Borough commented that it appears that “factors other than the congestion charge are at play. That is not to say that the removal of the Western Extension would not assist struggling businesses however”. Kensington and Chelsea mentioned that of 23 requests to the council to have National Non-Domestic Rates waived, “three specifically mentioned the Congestion Charge as contributing to their difficulties in making the payments”. However, the Royal Borough stated that their “commercial vacancy rates have not changed since the introduction of the Western Extension”.

The London Borough of Hammersmith & Fulham stated that “local trade has been adversely affected and businesses such as florists, estate agents and dry cleaners are losing customers who are deterred by the £8 charge”.

The London Borough of Wandsworth stated that “the council's annual business survey (of about 500 businesses in Wandsworth) has consistently identified concerns about congestion charging”. The Borough reported that “in 2008, only one in four businesses in Wandsworth considered that congestion charging had 'worked' over the past year”, and that “fewer than one in twenty businesses feel that congestion charging has any positive impact on their business while 29% feel that it has a detrimental effect”.

Social impacts

The Royal Borough of Kensington & Chelsea mentioned that TfL has identified problems for those who receive fewer visits from carers due to Congestion Charging and who thus feel isolated. The Royal Borough commented that TfL needs to devise solutions to this both in the Western Extension and in the original zone. Kensington and Chelsea further commented that removing the Western Extension or introducing a charge free period in the Western Extension would not help people needing to visit sick or elderly relatives in the original zone.

The London Borough of Hammersmith & Fulham stated that “large areas of Hammersmith & Fulham and Kensington & Chelsea, have poor public transport, and many people are reliant on cars to visit relatives, schools and hospitals, and find the £8 charge a heavy additional burden”. They also stated that “the charge is unfair in that residents of the zones receive a 90% discount, although those just outside it have to pay the full charge”. The London Borough went on to say that “as residents of Hammersmith and Fulham are, in general, less well off than those of Kensington & Chelsea, this amounts to a regressive tax which falls more heavily on poorer people”.

Other transport impacts

The London Borough of Southwark considered that the funding that would be lost for public transport improvements within London is significant. The London Borough stated that “in the current economic climate and as funding is directed towards a limited number of projects such as Tube upgrade, smaller yet more local impacts may suffer from funding deficiencies”.

The Royal Borough of Kensington & Chelsea stated that its surveys suggest that it is easier for residents to find overnight parking spaces but more difficult for those living outside the charging zone. The Royal Borough commented that the reduction in demand for visitor parking spaces has had a direct impact on the Council's revenue, which has reduced by six figures, which affects its ability to fund transport projects and schemes. However they went on to say that since the introduction of the Western Extension has led to a reduction in demand for visitor parking, should the Mayor choose to remove it, the Royal Borough will need to implement more visitor parking, which will put at risk the future of some planned and already implemented sustainable transport schemes.

The London Borough of Hammersmith & Fulham cited “additional parking pressure around tube stations near the border in their borough, where parking stress is already extremely high”.

Knock-on impacts

The London Borough of Southwark was “concerned that the removal of the western extension would set a precedent and may lead to other areas within the original zone to seek revisions leading to the incremental degradation of the zone”. The Borough commented that the “congestion charging scheme has provided a significant reduction in unnecessary trips within the zone which would be lost through a compromised scheme”.

Section 3.3 Option 3 – Change the way that the scheme operates

Description of this option

This option was intended both as a general precursor to the three options for changing the scheme (Option 3a – introducing accounts, Option 3b- a charge-free period and Option 3c -an increase to the Residents' discount), and as an invitation for respondents to identify other changes which they would like to see, which they could describe in the open text box. The responses to the change options 3a, 3b and 3c are described in Sections 3.4-3.6 of this report.

This section sets out the proportions of respondents selecting this option and summarises the 'other changes' suggested in the open text box. Many of the stakeholder comments about changing the scheme related to the change options 3a, 3b and 3c presented in the consultation, and are described in the relevant sections 3.4-3.6 below. Where their comments did not relate to these change options, they are summarised in this section

Responses to the option to change the way that the scheme operates

Consultation responses to this option

- Overall, 12% of respondents to the consultation preferred this option (13% of individual responses and 7% of business responses).
- A quarter (25%) of individuals living in the Western Extension and its buffer zones preferred this option, and 5% of businesses operating in this area preferred this option.

Responses to this option in the attitudinal surveys

- 15% of members of the public surveyed preferred this option.
- There was a fairly similar level of support for this option from residents in both the Western Extension and its buffer zones (18%) and the original charging zone and its buffer zones (16%).
- In the business survey, 14% of businesses overall preferred this option.

Other changes to the scheme (suggested in the open text box)

In the consultation, most respondents (57% overall) did not make any comment in the open text box. Amongst those who did, the comments most often made were not actually about making changes to the scheme: 17% were about removing the Western Extension. In terms of making other changes to the scheme, 5% suggested changes to the discounts and exemptions available and 4% were about the scheme boundary.

In both the public and business attitudinal surveys a similar pattern emerged, with the majority not making any comment and, in both cases, 2% making comments on the boundary and 2% on changes to discounts and exemptions. For businesses based in the WEZ, the proportion commenting on these two issues was 6% and 5% respectively.

Stakeholder responses to this option

Around a third of stakeholders selected this option. In some cases, stakeholders selected this option as well as stating that the Western Extension should be retained, and a number made their support for its retention conditional on one or more changes to the scheme. Sections 3.4 to 3.6 of this report set out stakeholder comments pertaining to the change options presented in the consultation.

Stakeholder comments on changes not related to the change options 3a, 3b, 3c

The Knightsbridge Association said that there should have been a fourth change option, to 'strengthen' the Congestion Charge, stating that Congestion Charging should be a meaningful part of the package of measures needed to comply fully with air quality laws and reduce congestion. The Association also said that they were not opposed to small administrative changes such as increasing Residents' discounts but would like to see the negative impact on emissions offset by strengthening the terms of the Low Emission Zone or possibly creating additional Low Emission Zones.

Living Streets said that the zone should be split into two, to discourage lengthier car journeys. The Society of Motor Manufacturers and Traders (SMMT), and the Campaign for Clean Air in London called for variable charging throughout the day using tag-and-beacon technology.

The Federation of Small Businesses (FSB) and the Freight Transport Association (FTA) said that businesses operating in the zone should be eligible for the Residents' discount; and the BVRLA said that car clubs should be exempt from the charge.

The Campaign for Better Transport did not support any of the change options presented but said that there should be a review of the level of the charge, to ensure it is set at a level which deters enough traffic to enable efficient use of the road network. The West London Residents' Association said that there should be a review of the categories of vehicles which are exempt from the charge. The FTA requested that consideration be given to a discount for vehicles which meet the Euro 6 standard, and for Enhanced Environmental Vehicles (EEVs).

Both Murad Qureshi AM and Karen Buck MP said that there needed to be some changes to the boundary of the scheme.

Responses from Boroughs in and around the zone

The City of London, the London boroughs of Islington and Southwark, and the Royal Borough of Kensington & Chelsea supported the 'change' option. Both the London Borough of Islington and the Royal Borough of Kensington & Chelsea said that there should be a comprehensive review of the Congestion Charging scheme, covering more than the future of the Western Extension.

The Royal Borough of Kensington & Chelsea mentioned that TfL has identified problems for those who receive fewer visits from carers due to Congestion Charging and who thus feel isolated. The Royal Borough also commented that TfL needs to devise solutions to this both in the Western Extension and in the original zone. Finally the Royal Borough stated that, if the Western Extension is retained, it would like TfL to work with its officers, and the London Borough of Hammersmith & Fulham, in reviewing the impacts of moving the boundary westwards.

The City of London reiterated that there should be an exemption for tenants of Smithfield Market. Westminster City Council stated that charging hours should end at 1.00pm.

Section 3.4: Option 3a – Make the charge easier to pay by introducing payment accounts.

Description of this option

The Western Extension would remain in place and continue to operate with the original central London Congestion Charging zone as one zone. An £8 daily charge for driving within the zone Monday to Friday 7.00am-6.00pm would apply as well as the existing range of discounts and exemptions.

Accounts would be introduced for drivers using the zone and would allow for payments to be processed automatically. This would make payments more convenient for customers and minimise the risk of customers incurring penalty charges due to forgetting to pay or making a mistake. Residents would be able to pay for single days and it is likely that payments would be taken from the relevant credit or debit card when a resident had driven in the zone for a total of five charging days. Non-account holders would still be able to pay the charge via the existing payment channels. This includes the existing Residents' discount system of paying £4 for five consecutive charging days, which would be retained for residents who did not opt for accounts.

Responses to this option

Consultation responses to this option

- 39% of respondents to the consultation supported the introduction of accounts to make the charge easier to pay, while 18% opposed it. Just over two-fifths (43%) of respondents neither opposed nor supported the option, did not know or did not state a preference. This was ranked first of the three change options by both individual and business respondents to the consultation.
- Of the change options, the introduction of accounts was the most popular choice amongst respondents who had preferred to either keep or change the way the scheme operates (supported by 64% and 75% of those groups respectively). Just over a quarter (26%) of those who preferred to remove the Western Extension supported the introduction of accounts.
- Almost two fifths (39%) of individual respondents to the consultation supported this option, more than double the 17% who opposed. A third did not state a preference and 10% didn't know or neither opposed or supported the option. 30% of business respondents supported the introduction of accounts, almost a quarter (24%) opposed and almost two-fifths (39%) did not state a preference.
- Over two-fifths (42%) of individuals living in the Western Extension and its buffer zones supported the introduction of accounts, while less than a fifth (18%) opposed this option. Almost 10% didn't know or neither supported or opposed the option, and 31% didn't state a preference.
- A quarter of businesses which operate in the Western Extension supported introducing accounts, while around a fifth (22%) opposed it. 45% of businesses operating in the Western Extension and its buffer zones did not state a preference and 7% didn't know or neither opposed nor supported the option.
- 39% of those who drive in the Congestion Charging zone supported this option, as did 47% of those who do not drive in the CCZ.

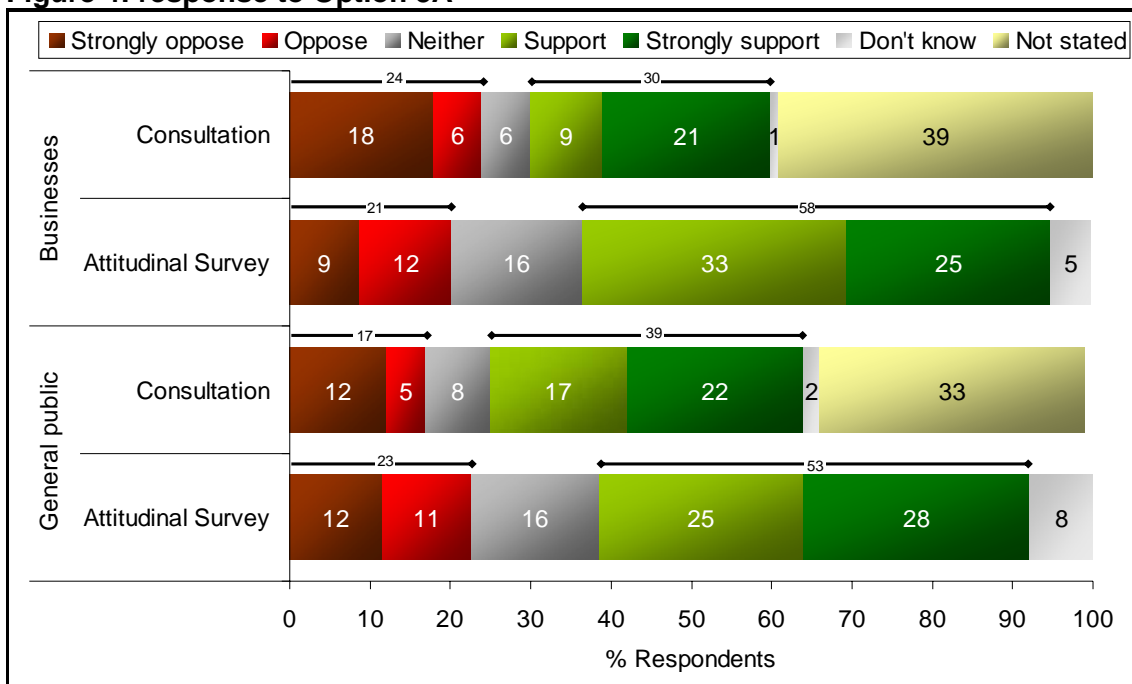
Responses to this option in the attitudinal surveys

- Over half (53%) of the general public supported the introduction of accounts, while just less than a quarter (23%) opposed it. Amongst the three change options, introducing accounts was the second most popular option. Those who neither supported nor opposed, or didn't know made up around a quarter (24%) of the public surveyed.
- Half of the residents of the Western Extension supported the introduction of accounts, over a quarter (28%) opposed it and around a fifth (22%) didn't know or neither supported or opposed the option.
- 56% of those who drive in the Western Extension supported this option, as did 54% of those who never drive in the Western Extension. 56% of Western Extension residents registered for the Resident's discount supported this option
- Those living in the Western Extension and its buffer zones were more opposed to accounts than those based or living in the original charging zone and its buffer zones. 28% of Western Extension residents opposed accounts compared to 16% of the original charging zone residents.

- Almost sixty per cent (58%) of businesses supported the introduction of accounts, while around a fifth (21%) opposed. Similar to the general public, accounts was the second most popular option of the three change options.
- Over half (54%) of Western Extension based businesses supported introducing accounts, a fifth opposed and over a quarter (27%) did not know or neither supported nor opposed the option.
- Businesses in the original charging zone and the rest of London were more supportive of accounts than businesses in the Western Extension. Larger businesses were more likely to support accounts than smaller businesses.
- Common reasons given by both businesses and the public opposing this option were that they did not trust TfL with account details or money, did not support Congestion Charging and concern that accounts should not be compulsory.

The chart below compares the responses to Option 3A for both individual and business respondents to the consultation and the attitudinal surveys

Figure 4: response to Option 3A



Stakeholders' responses to this option

Twenty one stakeholders supported the introduction of accounts to make the charge easier to pay, including five London boroughs and London Councils, three motoring organisations and three business groups. The AA and Federation of Small Business called for accounts to be introduced across the extended zone and not just the Western Extension. SMMT suggested that an account based tag and beacon system could make the payment process easier for individuals and business by reducing errors and the administrative burden. The Freight Transport Association was supportive of accounts as it would allow operators of smaller fleets to benefit from easier payment facilities.

Although not against accounts, Friends of the Earth stated that it would need to be the case that changing the scheme by introducing accounts was essential and would result in overall benefits, given the estimated small increases in traffic and congestion, and related emissions.

London TravelWatch noted that accounts could lead to increased congestion. The Campaign for Better Transport and the West London Residents' Association (WLRA) also opposed the introduction of accounts.

Responses from boroughs in and around the zone

Support/opposition

London Councils, and the London Borough of Islington, supported the introduction of accounts to the Congestion Charging scheme even if the Western Extension is removed. London Councils also thought that consideration should be given to the possibility of linking the accounts payment facility to the Oystercard system.

The London Borough of Southwark particularly supported improvements to payment options for residents.

The City of London supported the introduction of accounts, provided that separate exemptions exist for the Western Extension and the Central zone.

The London Borough of Wandsworth gave support to the option of introducing of accounts, if the Western Extension is not removed.

Fairness/ease of payment

The Royal Borough of Kensington and Chelsea thought that the fairness and user-friendliness gained from introducing accounts outweigh the disadvantage of reduced income.

Section 3.5: Option 3b – Introduce a charge-free period in the middle of the day in the Western Extension

Description of this option

A charge-free period would be introduced in the Western Extension during the middle of the day, for example from 11am to 2pm. Drivers would be able to drive within the Western Extension charge-free during this period. However, the charge in the original central London Congestion Charging zone would continue to apply throughout the day as it does now. Transport for London (TfL) is still considering the practical and operational implications of this change and, depending on how it is further developed, it is possible that it might only be available to account-holding drivers.

In the consultation materials, an example scenario for a charge-free period was provided, in order to help respondents understand how such a change might work in practice. This example is set out below:

Morning (e.g. 7am to 11am)	£8
Middle of the day (e.g. 11am to 2pm) in the Western Extension	£0
Afternoon (e.g. 2pm to 6pm)	£8
Capped daily charge	£8

Under this example, those driving solely within the Western Extension during the middle of the day would not have to pay the Congestion Charge, but those who drive in both the Western Extension and the original charging zone, or in the Western Extension during the charged periods would still have to pay. The daily charge would be capped at £8, so those driving in the zone in either the morning or the afternoon charged periods, or in both, would pay £8 (the same as the current daily charge).

Responses to this option

Consultation responses to this option

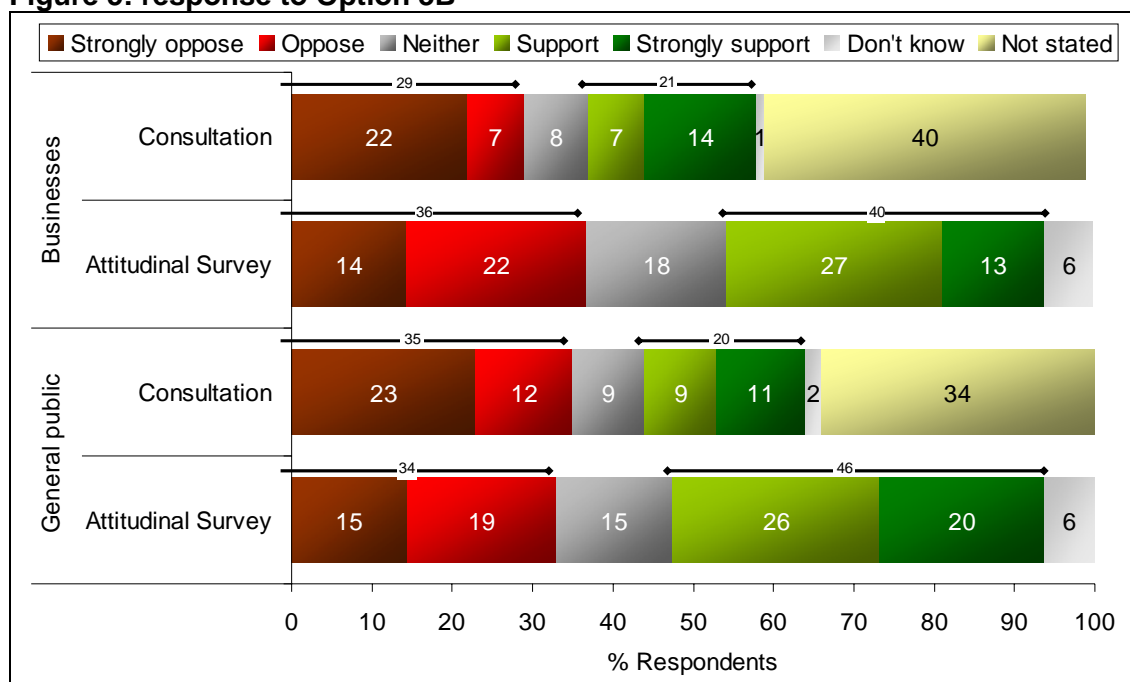
- Overall, 21% of respondents to the consultation supported this option, compared with 34% who opposed it. Over a third of respondents (35%) did not state a preference and 11% neither opposed nor supported the option or did not know.
- 20% of individual respondents and 21% of business respondents supported this option, compared with 36% of individual respondents and 30% of business respondents who opposed it. Half of business respondents and 45% of individual respondents neither opposed nor supported the option, did not know or did not state a preference.
- Under a fifth (19%) of individuals living in the Western Extension or its buffer zones supported this option while twice as many (38%) opposed it.
- 19% of business respondents operating in the Western Extension supported this option, compared with 26% who opposed it. Over half (55%) of these businesses neither opposed nor supported the option, did not know, or did not state a preference.
- While 22% of those who drive in the Congestion Charging zone supported this option, 33% opposed it. Only 13% of those who do not drive in CCZ supported it, and 52% opposed it.
- Of all three change options, this was the least popular choice for both business and individual respondents to the consultation and the attitudinal surveys.

Responses to this option in the attitudinal surveys

- Overall, 46% of members of the public surveyed supported this option compared to 34% who opposed. Around a fifth (21%) of those surveyed neither opposed nor supported the option or did not know.
- Amongst those living in the Western Extension or its buffer zones, 38% supported this option, compared with 42% who opposed it. Around a fifth (21%) of these individuals also neither opposed or supported the option or did not know.
- Of those who opposed this option, they were chiefly concerned about the negative impact on traffic/congestion (34%), and that the scheme would be too confusing for drivers (27%).
- Of those that said that they drive in the WEZ, 43% supported a charge-free period in the middle of the day. Those who did not drive in the Western Extension showed a similar level of support for this option (45%). Opposition to this option was higher amongst those who did drive in the Western Extension, (41%) than those who did not drive in the Western Extension (33%).
- A similar proportion of individuals who normally travel by public transport (44%) and by car (46%) supported this option.
- 40% of London businesses surveyed supported this option. This is significantly higher than the 21% of businesses responding to the consultation which supported this option. Larger businesses were slightly more likely to support a charge-free period in the middle of the day in the Western Extension than smaller businesses.
- Of the businesses surveyed in the Western Extension, respondents were fairly evenly divided between those that supported this option (40%), and those who opposed it (42%). For those businesses which opposed it, the reasons most often given were the same as those identified by public respondents: that it would make traffic/congestion worse (33%) and would be too confusing for drivers (31%).

The chart below compares the responses to Option 3B for both individual and business respondents to the consultation and the attitudinal surveys

Figure 5: response to Option 3B



Stakeholder responses to this option

Around a quarter of stakeholders that responded to the consultation opposed the introduction of a charge free period. Many of these expressed concern that it would add complexity to the scheme and could lead to increases in traffic and congestion.

There was little support from stakeholders for this option. The RAC Foundation said that the charge-free period should only be introduced if it helps with peak spreading, if traffic during the period can be accommodated, and if it reduces costs for businesses. The BVRLA thought that a charge-free period in the middle of the day may help to reduce congestion by spreading traffic more evenly across the day. However, they also thought that a charge-free period may lead to further confusion for drivers and assumed extra signage would be required. Two business representative organisations also supported this option. CBI London agreed with the principle but suggested a longer charge-free period, and the Federation of Small Businesses felt that a charge-free period should be applied across the whole zone.

Conversely, the Freight Transport Association thought that a charge-free period in the Western Extension in the middle of the day would not be helpful to commercial operators because they had little flexibility about when to make deliveries and would most likely use both parts of the zone during the day.

Karen Buck, Labour MP for Regents Park and North Kensington, supported a reduction in the core operational hours of the charge.

Responses from boroughs in and around the zone

Support/opposition

The London Borough of Camden did not support the introduction of a charge-free period in the middle of the day because it would introduce complexity and might set a precedent for the original charging zone. Similarly, the London Borough of Southwark opposed the option on the grounds of complexity and the likely need for additional signage in order to enable drivers to differentiate between the zones. It also mentioned that misinterpretation of the zone as well as local bunching could lead to more Penalty Charge Notices. City of London opposed this option as it would

increase congestion both in the Western Extension and in the City, where the middle of the day was already a congested period.

The London Borough of Wandsworth supported this option, if the Western Extension was not removed.

Traffic/congestion

The London Borough of Islington opposed a charge-free period in the middle of the day as it was concerned that this option would lead to increased congestion in the Western Extension including disruption to the bus network; would need to also be rolled-out to the original charging zone to reduce confusion; and would raise road safety concerns as motorists rushed to leave the zone before the end of the charge-free period.

Business/economy

The Royal Borough of Kensington and Chelsea considered that this option could offer some benefits for businesses, particularly in the service sector, which might see some increase in customers as a result of a charge-free period. It stated that there could also be benefits for residents of the Western Extension who are dependent on non-residents visiting them.

Ease of use/understanding

The Royal Borough was concerned, however, that TfL may receive complaints from drivers trapped in the charging zone, as the charge free period ends, due to heavy traffic. It might also be confusing for drivers and offering it to account holders only may exacerbate the confusion. It suggested that one way to simplify the option is to apply it across the whole zone. Finally, it noted that the option could create a new peak period which would necessitate changes to waiting and loading restrictions in some locations. A possible consequence for the Royal Borough would be that it may not be able to achieve the most efficient use of its parking bays, some of which have already been re-allocated to other uses.

London Councils acknowledged the potential advantages of a charge-free period but was also concerned about the likely complexity and confusion of this option. London Councils suggested that a trial be considered to assess the effectiveness of such a proposal before any firm decision is made. It should be noted that even a trial would require a Variation Order.

Alternatives

The City of Westminster did not support the option but said that charging hours should end at 1pm, which would still address morning peak traffic but would benefit the theatre and restaurant trade later in the day.

Section 3.6: Option 3c – Change the scheme by increasing the Residents' discount to 100%

Description of this option

The extended zone, which includes both the original zone and the Western Extension, would remain in place and continue to operate as it does at present for non-residents: an £8 daily charge for driving within the Congestion Charging zone Monday to Friday 7.00am to 6.00pm. There would continue to be a range of discounts and exemptions available to certain categories of vehicles and individuals.

If this change option were implemented, residents of both the Western Extension and the original central London Congestion Charging zone (and those living just outside the charging zone who are eligible for the Residents' discount) would receive a 100% Residents' discount throughout the extended zone.

Consultation responses to this option

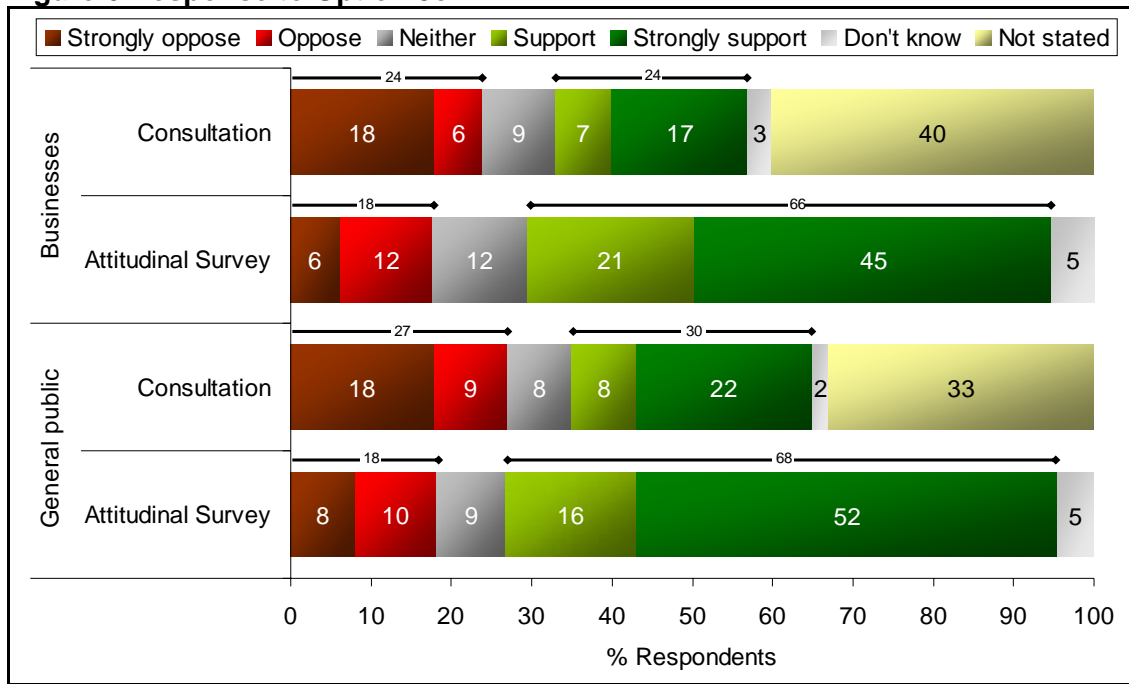
- Overall 29% of respondents to the consultation supported this option, compared to 27% who opposed it. 44% of respondents did not state an opinion, or selected 'neither' or 'don't know'.
- 30% of individual respondents supported this option (28% opposed) and 24% of business respondents supported it (24% opposed). For these two groups, the proportions with no stated opinion were 33% and 40% respectively.
- 54% of residents within the Western Extension and its buffer zones supported this option (27% no opinion stated), as did 21% of business respondents in this area, (46% no opinion stated).
- 31% of respondents who drive in the Congestion Charging Zone supported this option (33% no opinion stated, 26% opposed).
- Of respondents who ticked Option 1 (Keep), 20% went on to support this change option; for Option 2 (Remove), 27% went on to support this change option, for Option 3 (Change), 57% went on to support this change option.

Responses to this option in the attitudinal surveys

- This was the most supported of the change options (options 3a, 3b and 3c) among members of the public, with 68% supporting it.
- Three-quarters of individuals living in the Western Extension and its buffer zones supported this option, meaning that it was the most popular change option for individuals living in the Western Extension.
- 74% of individuals who drive in the Western Extension supported this option, as did 68% of individuals who do not drive in this area.
- In terms of people's normal means of travel, car users were the strongest supporters of this option (73%), and cyclists the least (61%).
- This was also the change option most strongly supported both by London businesses (66%) and businesses in the Western Extension (63%).
- Generally, support for this option was much stronger in the attitudinal surveys than in the responses to the public consultation.
- Among the 18% of members of the public who opposed this option, the reason most often given was that it would not be fair to have different charges (37%); this was also the reason most often given (29%) among the 19% of businesses which did not support this option.

The chart below compares the responses to Option 3C for both individual and business respondents to the consultation and the attitudinal surveys.

Figure 6: response to Option 3c



Stakeholder responses to this option

Eight stakeholders supported this option, including CBI London and the GLA Labour Group. However, as detailed below, several stakeholders made their support conditional on other changes to the scheme. Twelve stakeholders did not support this option, including a number of transport and environment organisations. The West London Residents' Association (WLRA) and London First also opposed this option

The GLA Labour Group said that it would be fair for all residents to have a 100% discount as they have no choice as to whether to enter the zone or not, and that the discount should be equally applied to both the Western Extension and the original charging zone. Karen Buck, Labour MP for Regents Park and North Kensington, called for an extension of the Residents' discount to all residents of Westminster.

The Knightsbridge Association supported administrative changes such as this one provided there is action to offset increases in emissions by the introduction of further low emission zones. The BVRLA supported this option provided there was also a change to the scheme so that residents may change the vehicle which is registered for the discount at no charge.

A number of environment and transport organisations commented on the likely impact of this option in terms of increased private car use and vehicle emissions. Friends of the Earth said that this option could lead to a small increase in traffic and vehicle emissions, and would reduce revenue. London TravelWatch objected to any increase to the Residents' discount because it could act as a disincentive to residents to reduce their reliance on private car use. Similarly the RAC said that there should be some cost attached to car usage for those well-served by public transport because it is useful in achieving modal shift.

The WLRA said that this option was intended as an inducement for residents to say that they preferred to retain the Western Extension. It would not help to reduce congestion and would create a situation where non-residents felt that residents had received preferential treatment.

A number of stakeholders made comments with regard to the separation of the Western Extension and the original central zone, some stating that the Residents' discount should be adapted for each zone. For example, the CBI commented that TfL should consider two independent zones where residents could receive a 100 per cent discount in their 'home zone' but where movement between the zones is charged at a full £8. The London Cycling Campaign said that congestion caused by inter-zone travel could be addressed by separating the two zones, with separate charges for each and a discount for drivers and zone residents travelling across both zones. London First stated that the Western Extension should be made into a separate zone to reduce congestion, and that while there should not be a change to the Residents' discount, non-residents should pay a separate charge to drive within the Western Extension, additional to the charge for the original central zone.

Friends of Capital Transport did not support a 100% discount for residents, but said that it may support a combination of a 100% discount within the Western Extension coupled with a full charge for those driving from the western zone into the original zone.

The Freight Transport Association thought that commercial vehicles operating in the extended charging zone should be eligible for the 90% Residents' discount.

Responses from Boroughs in and around the zone

The Royal Borough of Kensington & Chelsea supported this option because it would assist the significant proportion of residents who they said find the existing charge difficult to afford or who are inconvenienced by paying it on an ad-hoc basis. It also said that if the Western Extension was removed, its residents should continue to receive the Residents' discount for the original zone for a transitional period of up to ten years. The City of Westminster supported this option provided that a 100% Residents' discount was available to all residents of the borough, irrespective of whether they lived in the Western Extension, the original charging zone or outside the Congestion Charging zone.

The City of London opposed this option and said that there should be two Residents' discount zones, with the discount only applying in the zone in which the resident lives, because this would reduce the amount of traffic entering the City from the west. The London Borough of Camden also stated that the Congestion Charging zone should operate as two discount sub-zones for residents to discourage car journeys across the zones by residents.

The London Borough of Southwark supported the current situation where residents are eligible for a 90% discount. This promotes the increased usage of sustainable modes of travel for those living, working or visiting the borough, and while it considers that it is reasonable that residents of the congestion charge zone receive a discount, it is not appropriate that they should be able to drive without cost throughout central London. The London Borough of Islington did not support an increase to the Residents' discount because it would reduce the revenue available for complementary measures and might encourage residents who do not at present own a car to buy one, so contributing to traffic problems and vehicle emissions.

The London Borough of Wandsworth neither supported nor opposed increasing the Residents' discount to 100% but reiterated its request for residents of north Battersea to be made eligible for the Residents' discount.

Chapter 4: Considerations

Context

TfL conducted this non-statutory consultation on behalf of the Mayor of London. Announcing his intention to hold this consultation in July 2008, the Mayor emphasised that he was keen to hear Londoners' views as to whether the scheme should be removed or retained, as well as ways in which it could be improved. Accordingly, the information presented in the consultation included options for possible changes and also invited respondents to say in their own words how the Western Extension could be improved.

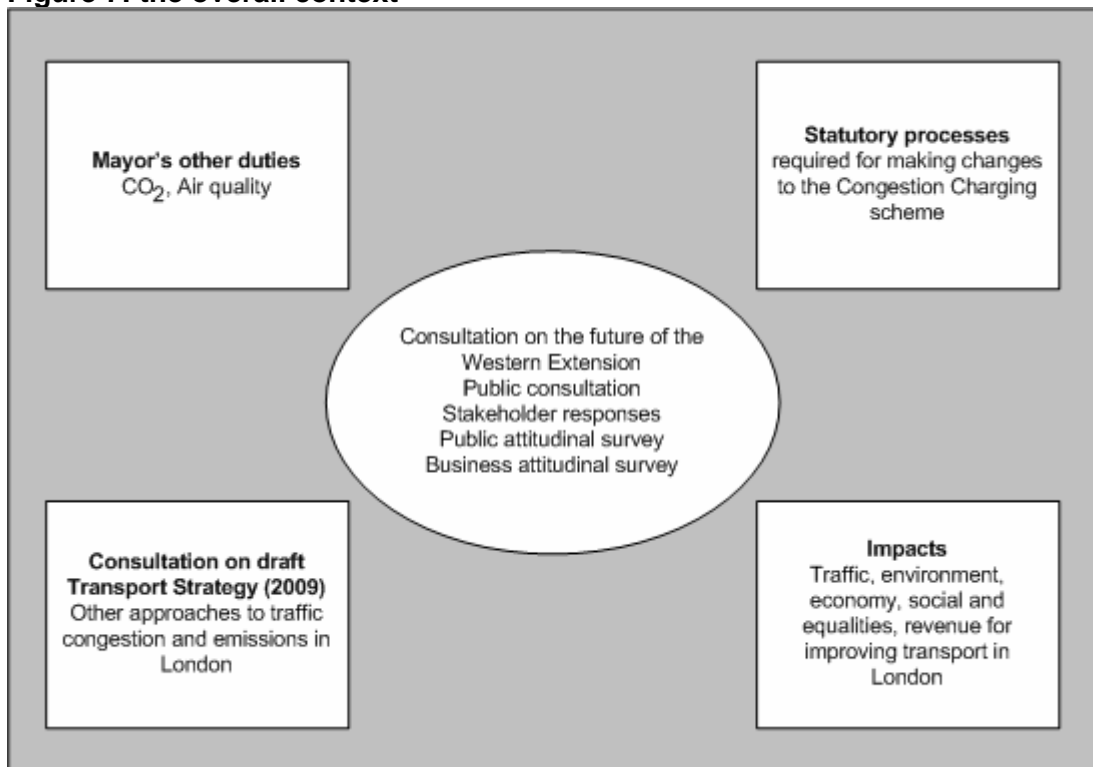
This report sets out the responses to the consultation and other relevant issues in order to inform the Mayor's decision regarding the Western Extension. It is important to note that any changes to the Western Extension, including its removal, would require further, statutory consultation.

Factors for the Mayor to consider

The Mayor clearly stated that he would listen to the views of Londoners. In total, over 27,000 members of the public responded to this consultation, as well as 48 stakeholders including several London Boroughs within or contiguous to the extended Congestion Charging zone. Attitudinal surveys of public and businesses complemented the findings of the consultation by providing a sample which is more representative of London as a whole. The response from these groups is detailed in Chapter 3. As set out, the strong preference from the consultation is for the removal of the Western Extension.

There are a number of other factors which the Mayor will want to consider in deciding how he wishes to proceed. This section sets out the context in which this consultation operates, which may have a bearing on the next steps. Figure 7 below summarises this.

Figure 7: the overall context



Potential Impacts

The potential impacts of each option (as provided by TfL for the consultation in the Supplementary Information) are briefly summarised below. There is also a brief overview of the likely operational implications of each option, indicative implementation timescales and a summary of any specific issues pertaining to them. Were any of the options (other than simply retaining the Western Extension as it is) to be pursued, TfL would need to undertake further appraisal of both impacts and operational issues, as well as following the appropriate legal processes, including formal consultation.

Option 1: Keep the Western Extension as it is

Traffic and Congestion Impacts: Much depends on whether the effective capacity of the road network remains constrained as it is at present. Assuming this is the case, at least in the short term, the benefits in terms of reduced traffic and vehicle emissions would be retained at the level reported for 2007/08. While charging in the Western Extension has led to a significant decrease in the number of vehicles entering the area, reductions in effective road capacity caused by utility and development works and measures such as those to improve pedestrian safety have eroded the congestion relief initially afforded by reduced traffic volumes such that congestion is now at the same level as it was before the introduction of charging. Nevertheless these conditions are likely to be better than those that would have existed without charging.

These conditions may change over time. If a significant proportion of the “lost” network capacity could be recovered, the traffic and congestion impacts of all the options under consideration would be improved (in terms of the outturn results rather than relative impacts). However, it is not possible to give a comprehensive forecast of conditions in 2010 at this stage.

With the reductions in traffic levels, there have been reduced demands for parking inside the zone. This has provided increased opportunities for boroughs to consider giving space over to other uses, for example bicycle parking, in support of Mayoral initiatives to promote more sustainable transport.

Environmental Impacts: Since the introduction of the Western Extension in February 2007, there have been reductions in vehicular emissions of NO_x of around 3 per cent, PM₁₀ emissions have been cut by 4 per cent and CO₂ emissions have been cut by 7 per cent. Despite these reductions, no measurable impact on local air quality has been discerned as local emissions have only a small impact on air quality in central London. Also, as already noted, despite significantly reduced traffic levels, the Western Extension has not experienced a corresponding sustained impact on congestion. If in the future congestion levels were to reduce, further small reductions in emissions from road transport would be expected. Continued improvements in vehicle technology are also expected to reduce emissions of air pollutant and CO₂ from vehicles.

Revenue impacts: The revenue generated by the scheme for investment in transport would be retained. Assuming traffic levels remain steady, TfL estimates that the scheme (including both the original charging zone and the Western Extension) would generate an average of £145 – £175m net income per year.

Impacts for drivers: No change, but see section on Operational Implications below.

Operational Implications: In itself, this option would have no operational implications. However, this option could be coupled with the change options outlined in 3a-3c (or other changes), and TfL is always seeking to improve the scheme, so ‘business as usual’ does not imply that the scheme always remains exactly as it is, or that this is a ‘do nothing’ option.

TfL would continue to run its comprehensive monitoring programme looking at the effects of the Western Extension on traffic levels, congestion and emissions from road transport as well as its economic and social impacts. It is likely that some variations to the scheme, which would be subject to public and stakeholder consultation, would be made over time as opportunities to improve the Congestion Charging scheme arose.

Key Issues: TfL will continue to investigate the potential for improved traffic management to mitigate the effects of roadworks and other factors affecting congestion in the zone. A new Mayor's Transport Strategy, which is likely to be the subject of consultation in 2009, will outline the overall approach to managing traffic and congestion in the capital.

Timescales and Statutory processes for implementing this option: None, although it would be expected that, over time, changes and improvements to the scheme would be the subject of Variation Order consultations.

Option 2: Remove the Western Extension

Traffic and Congestion Impacts: Once again, the impact of removing the Western Extension would depend to a large extent on whether road network capacity remains constrained at current levels. It is hard to quantify the likely impacts precisely, but if effective capacity remains constrained as now then the increase in traffic (as a result of some drivers who are currently deterred by the charge returning to the zone) could mean an increase of around 15 per cent to 25 per cent on current congestion levels (congestion being the delay experienced by traffic passing through finite roadspace). Not all drivers deterred by the charge are assumed to return; some may prefer their new travel choices – but the likely increase in traffic and congestion would represent an increase on the level of congestion which prevailed before charging was introduced in the Western Extension.

There would be a small decrease in traffic volumes entering the original central London Congestion Charging zone – partly due to the impacts of the removal of the Residents' discount from the residents of the former Western Extension.

Under a scenario in which effective network capacity is increased, the congestion impacts of removing the Western Extension could be ameliorated to some extent; the extent would depend on the level of increase in effective capacity that is possible.

Environmental Impacts: Rising traffic levels as previously deterred drivers returned to the former Western Extension area would lead to local increases in emissions of air pollutants and CO₂ from road transport. In order to exclude the impact of the anticipated improvement to the emissions performance of the vehicle fleet between 2007 and 2010, TfL has used a base case of 2010 to model the impacts of this option. Using this approach, it is estimated that the returning traffic would result in emissions from road transport of around 5 per cent more NO_x, 7 per cent more PM₁₀ and 8 per cent more CO₂. However these small changes in vehicle emissions are, as described above, unlikely to have a material effect on measured air quality inside the Western Extension area or the boundary route.

Revenue impacts: The impact of removing the Western Extension on scheme finances would likely be significant. TfL's estimates suggest that it could amount to a reduction of some £70m per year from the projected annual net income of £145-£175m per year. Current negotiations to improve the operation of the Congestion Charging scheme could help offset this reduction by some £5m to £10m.

Impacts for drivers: Again, this is largely dependent on how far road network capacity continues to be constrained, and the volume of traffic returning; if most of the traffic were to return, a journey into and out of the Western Extension area might take up to five minutes longer than it does at present.

However, there would likely be a small decrease in traffic entering the original central zone when those who live in the Western Extension area lose their eligibility for the Residents' discount.

Economy impacts: Businesses could benefit from not having to pay the charge to drive within the Western Extension area, although operational costs associated with increased congestion would rise. An increase in car-borne shoppers could also benefit businesses, perhaps particularly small to medium sized enterprises.

Social impacts: There could be a benefit to those who currently find the charge difficult to afford (and who have been deterred from driving in the Western Extension) and this may particularly benefit certain social groups.

Operational Implications: This option would have a major impact on the operation of the Congestion Charge and incur some one-off costs as well as an ongoing reduction in scheme revenue. It would entail changes to infrastructure such as the removal and amendment of signage and road markings and the decommissioning and removal of cameras and other equipment associated with the Western Extension. It is possible that some infrastructure could be left in place to assist with the monitoring of traffic and congestion.

Changes to the contract between TfL and its service provider would have to be made to reflect the reduction in payment and other transaction volumes which would itself be likely to entail costs as parts of the contract are terminated.

TfL and its service provider would need to manage the likely increase in customer enquiries generated by the change as well as notifying registered users about how the change affects them. Administrative processes would need to be developed for dealing with residents of the former Western Extension who had been registered for the Residents' discount and, as a consequence of this change, would once again be liable for the full £8 daily charge.

There would also need to be a policy with regard to refunds for drivers who had purchased monthly or annual charges to drive in the extended zone, particularly those who may have bought the charge solely or primarily for driving in the former Western Extension area. Again, both the administration of this process, and making any such refunds would involve a cost to TfL.

The complementary traffic and transport measures introduced for the Western Extension (for example, additional bus services and the timings in Controlled Parking Zones) would be subject to review and discussions with the relevant boroughs.

Key Issues: Measures intended to offset the potentially undesirable impacts of removing the Western Extension on congestion and emissions from road transport would need to be part of the broader approach set out in the Mayor's Transport Strategy.

Furthermore, TfL would take steps to ensure that 'traffic smoothing measures', advocated in the Mayor's recently published 'Way to Go', were prioritised in the Western Extension area to help mitigate the effects of increased congestion. TfL's monitoring programme for the original central London scheme would continue.

If the Western Extension was removed, residents in the Western Extension and its buffer zones would no longer be eligible for the Residents' discount for the original charging zone. Operational processes will need to be put in place to manage the transition.

Timescales and Statutory processes for implementing this option: The removal of the Western Extension would require a revision to the Mayor's Transport Strategy as the current Strategy explicitly refers to the extension of the central zone. A public consultation on the Strategy Revision would need to be undertaken before it could be confirmed by the Mayor.

The Mayor's Transport Strategy would also be subject to a Strategic Environmental Impact Assessment which would address the environmental effects of the Strategy without the Western Extension.

Following confirmation of a revised Strategy, a variation to the Greater London (Central Zone) Congestion Charging Order, revising the boundary and making other related amendments, would need be consulted upon and confirmed by the Mayor before any changes could be implemented. The earliest date that the Western Extension could be removed is spring 2010.

Option 3: Change the scheme

The implications of implementing the three specific options for changing the way that the scheme operates (introducing accounts, increasing the Residents' discount to 100%, and introducing a charge-free period in the Western Extension) are detailed below.

Option 3a: Introduce an account-based payment system

Traffic and Congestion Impacts: Because accounts would make it easier to pay the charge, there might be a small increase in traffic levels as drivers who had previously been deterred from driving in the zone by the effort required to pay the charge, or concern about incurring a Penalty Charge Notice.

Some residents who were previously deterred by the need to pay for a minimum of five consecutive charging days to receive the 90% discount might be encouraged to drive, or to drive more often, while others might drive less because each day's use of the zone would incur a charge (whereas the five day payment may have been seen as a "sunk cost"). TfL's preliminary appraisal suggests that there could be an increase of around 1 to 2 percent in traffic levels and 1 to 3 percent in congestion inside the zone. This would apply also to the original charging zone.

It should be noted that accounts would be optional and that other payment channels would continue to operate in parallel. The impact of accounts will hence be determined to a large extent by how many drivers choose to register, and this will vary over time and be influenced by the features of the account.

Environmental Impacts: It is expected that the small increase in traffic levels would lead to a correspondingly small increase in vehicle emissions of air pollutants and CO₂.

Impacts for drivers: This option would be of benefit to drivers who chose to register for an account in that it would make the charge easier to pay, and could also result in savings because of the reduced risk of receiving penalty charges. Residents would also benefit from being able to pay the charge at the Residents' discounted rate only for the days they travel.

Economy impacts: Small businesses operating fleets of under ten vehicles (who are currently unable to join the Congestion Charging Fleet scheme) could benefit; the option to register for an account could reduce the 'hassle' associated with paying the charge and reduce penalty charges.

Operational Implications: TfL's contract with IBM, who will provide Congestion Charging services from November 2009, will enable payment accounts for registered users to be introduced, if determined to be beneficial overall.

If this option were to be implemented, TfL would need to run a communications campaign to explain to prospective account-holders how to register for and manage an account, and deal with customer enquiries about this new facility.

An enforcement process would continue to operate, with Penalty Charge Notices being issued after attempts to contact account-holding customers had been made and non-payment had reached a certain level.

Existing channels for the payment of the Congestion Charge would continue to operate alongside payment accounts, which would be optional. No changes to scheme signage would be required.

Timescales and Statutory processes for implementing this option: A variation to the Greater London (Central Zone) Congestion Charging Order would need to be consulted upon and confirmed before this option could be introduced. This consultation would provide further information about the various options for implementing and operating accounts, as well as an appraisal of the likely impacts of these options. The earliest that payment accounts could be introduced is spring 2010.

Key Issues: The new service provider's contract enables accounts to be introduced later in 2010 – if the Mayor wished to bring the implementation date forward, this could be changed but would incur an additional cost for TfL. If accounts were introduced with no other changes, it is estimated that net revenues from Congestion Charging could reduce by up to £30m per annum.

This change option received support from stakeholders. A number stated that, regardless of the future of the Western Extension, the charge should be made as easy as possible to pay. However, some respondents highlighted concerns about management of information, privacy and related matters which would need to be addressed if accounts were to be implemented.

Option 3b: Introduce a charge-free period in the middle of the day in the Western Extension

Traffic and Congestion Impacts: TfL's preliminary appraisal estimates that there might be an increase in entering traffic of some 1 to 4 percent in the Western Extension under this scenario across the day, with more significant increases during the period when the Western Extension is not charged.

The increases in traffic in the Western Extension would be likely to lead to increases in congestion which could average some 2 to 6 percent across the charging day. However, it is likely that increases would be highly concentrated in the uncharged period – where more significant increases in congestion might be possible (potentially up to around 20 percent). Due to the particular complexity of assessing this option, and its sensitivity to the definition of the charge-free period, these projections can only be considered indicative.

Environmental Impacts: Increases in traffic would lead to small increases in vehicle emissions, but these would be minor.

Impacts for drivers: For drivers who were able to arrange to make journeys within the Western Extension during the charge-free period, this option could provide benefits, although this would depend to some extent on the precise times of the uncharged period. Some might particularly benefit, for example people living just outside the boundary who could schedule local trips at this time. Businesses could benefit if they could schedule deliveries in the Western Extension for this period, and shops and restaurants could see some increases to lunchtime trade.

Operational Implications: This is a complex option both in terms of TfL implementation and drivers' understanding and interaction with it. This option would entail moving from a simple charge structure, under which most liable drivers pay £8 per day, to a charge which varied both by time of day and where the vehicle was used in the Congestion Charging Zone.

To introduce this option, TfL would need to make a change to the contract with IBM, which because of the complexity of the change would incur costs. TfL would need to launch a public information campaign to explain to drivers how the change applied to them, and manage both an increase in queries when the change was introduced as well as ongoing queries from customers about how the charge applied to them.

Enforcement would become more complicated and there would probably be an increase in challenges to Penalty Charge Notices before drivers gained understanding of the operation of the charge-free period. Additional information would need to be added to signage to explain both the times of the charge-free period and where it applied. This is complicated by the fact that the present signage does not distinguish between the Western Extension and the original charging zone. The impact on Congestion Charging net revenues could be a reduction of around £20m per annum.

Timescales and Statutory processes for implementing this option: A variation to the Greater London (Central Zone) Congestion Charging Order would need to be consulted upon and confirmed before this option could be introduced. This consultation would be an opportunity to refine the design of this option, and to assess further the implications for both the operation of the scheme and for potential users. As highlighted, this option might only be available to account-holding customers, in which case both this option and the option for introducing accounts would be consulted on at the same time. This option could not be introduced until 2010.

Key Issues: This is the most operationally challenging of the change options consulted on in terms of both upfront changes to the scheme and ongoing management of the information, payment and enforcement processes associated with it.

Its complexity means that it could be difficult for users to understand and may lead to an increase in the numbers of Penalty Charge Notices issued by TfL and challenged by recipients.

Option 3c: Increase the Residents' discount from 90% to 100%

Traffic and Congestion Impacts: Because drivers entitled to the Residents' discount represent a small proportion of overall drivers – albeit a significant proportion of drivers in the zone on any given day – increasing their discount to 100% would lead to only a small increase in overall traffic and congestion levels both within the extended zone and outside it.

Environmental Impacts: Assuming some small increases in traffic, accordingly small increases in vehicle emissions would be expected.

Operational Implications: This option could be implemented relatively straightforwardly. TfL would have to make a change to the contract with IBM to vary the discount level and make refunds to residents who had purchased monthly or annual charges, which would incur a small cost. Residents would need to register with TfL for the discount – as they do at present – and there would be no need for a major public information campaign since TfL could inform registered residents about the change by direct communication. No changes to signage would be required and there would probably be a small reduction in the number of penalty charges issued. The impact on net revenues from Congestion Charging could be a reduction of around £10m per annum.

Timescales and Statutory processes for implementing this option: A variation to the Greater London (Central Zone) Congestion Charging Order would need to be consulted upon and confirmed before this option could be introduced. This discount system could be introduced in 2010.

Key Issues: Operationally, it would be fairly simple to introduce since it is a minor amendment to an existing process. However, scheme income would decrease as residents would no longer liable to pay the charge at all.

Legal responsibilities

In exercising his powers generally, the Mayor has a number of duties under the Greater London Authority Act 1999 (as amended). These will need to be considered in determining how to proceed with any of the options, particularly where they require the revision of the current Transport Strategy. The most relevant of these duties are summarised below:

- He must have regard to the effect that the proposed exercise of his powers or revision of the Strategy will have on each of four statutory “cross-cutting themes”. These are: the health of persons in Greater London, health inequalities between persons living in that area, the achievement of sustainable development in the United Kingdom, and the effect on climate change and the consequences of climate change (as those terms are defined in the Act)
- In addition, the Mayor’s Transport Strategy must contain such of the available policies and proposals relating to the strategy as he considers best calculated to promote or achieve each of those four cross-cutting themes. (This duty does not apply to the extent that the Mayor considers that any action that would be need to be taken by virtue of that duty is not reasonably practicable in all the circumstances of the case)
- The Mayor must also have regard to the GLA’s “principal purposes”: promoting economic development and wealth creation in Greater London, and promoting social development and the improvement of the environment in that area;
- He must have regard to the need to ensure that the revised transport strategy is consistent with (a) national policies and (b) with such international obligations as the Secretary of State has notified to him for that purpose
- In addition to the Mayor’s Transport Strategy, there are 11 other statutory strategies that the Mayor is required to publish under section 41 of the 1999 Act. The Mayor must have regard to the need to ensure that the revised Transport Strategy is consistent with each of these. Particularly relevant are the Mayor’s climate change mitigation and energy strategy, the adaptations to climate change strategy and the air quality strategy
- The Mayor must have regard to the resources available for implementation of the revised Transport Strategy
- New duties in relation to climate change were introduced by the Greater London Authority Act 2007. The Mayor is under a general duty to take action with a view to the mitigation of, or adaptation to, climate change. In addition, in exercising any statutory function (whether under the 1999 Act or otherwise) the Mayor must take into account any policies announced by the Government with respect to climate change or its consequences. The Mayor must also have regard to any guidance, and comply with any directions, issued by the Secretary of State in relation to these matters
- New duties in relation to health inequalities were also introduced by the 2007 Act.

Air Quality

The EU Air Quality Directives set “limit values” (target concentrations) and timescales for key pollutants, including particulate matter (PM₁₀) and nitrogen dioxide (NO₂), which are particularly harmful to human health.

Limit values are legally binding targets that all Member States must achieve by a certain date and if attained, must not exceed them. In 2007, the UK Government published a National Air Quality Strategy. This sets national standards and objectives, some of which are more stringent than those set in the EU directives.

The Mayor is legally required to improve air quality to work towards these objectives in London and a number of measures in the Mayor's Air Quality Strategy aim to improve air quality in London. In terms of transport, the London Low Emission Zone (LEZ) already acts to incentivise the adoption of the cleanest engine standards in lorries, coaches and buses which drive in London. These vehicles emit a substantial proportion of total emissions in London of PM₁₀ and NO₂.

The Mayor's duties with regard to air quality also oblige him to consider potential effects on PM and NO₂ levels when making any changes to transport policy. In this case, some of the options for changing the Western Extension could (without mitigation) adversely impact air pollution emissions from vehicles and could contribute to limit values being exceeded in the Western Extension as well as in other areas of London. That said, although the Congestion Charging scheme covers a relatively small area, any impacts resulting from changes to the Western Extension would have to be set in the context of the Mayor's overall Transport and Air Quality Strategies, particularly the policies and proposals for managing the environmental impact of transport.

Potential mitigation measures

As indicated above and in the consultation materials, some of the impacts of the consultation options would be undesirable. For this reason, TfL recommends that, if the Mayor is minded to remove the Western Extension and initiate statutory consultation on this, this is done as part of the broader revision of the Mayor's Transport Strategy to enable proper consideration to be given to mitigating the impacts and ensuring, overall, a package of policies which on balance are positive for transport, the environment, health and sustainable development.

Below are some of the potential areas of mitigation; at this stage this can only be outlined in fairly general terms. Should the Mayor decide he is minded to remove the Western Extension, more information would be provided as part of the statutory consultations.

Potential mitigation measures for traffic and congestion impacts

TfL's role in reducing congestion and improving traffic flow extends well beyond the Congestion Charging zone. Any specific interventions or enhancements to existing programmes which might be made in response to changes to the Western Extension would need to be considered in the context of TfL's overall approach to traffic management, both as it currently stands and as it might develop following a revised Transport Strategy.

The Traffic Management Act 2004 places a network management duty on local traffic authorities, including TfL. This duty is described as "securing the expeditious movement of traffic on the authority's road network" and "facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority." Department for Transport guidance on the Act states that "expeditious movement of traffic implies a network that is working efficiently without unnecessary delay to those travelling on it."

The removal of the Western Extension would be likely to have an impact on traffic levels and congestion within and around the Congestion Charging zone, which could, without mitigation, hinder the expeditious movement of traffic in the area.

The picture is complicated by network capacity restrictions (which were described in the consultation materials and in Chapter 1 section 5 of this document). These have meant that the significantly reduced traffic levels brought by the scheme have not resulted in a comparable reduction in congestion.

TfL has already begun tackling this through enhanced road and traffic management. Hence, measures put in place in response to any changes to the Western Extension would be regarded as augmentation of the ongoing efforts to manage traffic and congestion in the area. However these could be intensified or focused in and around the Western Extension Zone.

As indicated in “Way to Go!”, there will be an enhanced focus on network management initiatives to address the problems of reduced road capacity and ‘smooth traffic flows’. Some schemes are already in place to help reduce the number and duration of road works, others are being developed. For example:

- the Mayor’s agreement with Thames Water to help reduce the impact of their extensive programme of water mains replacement on traffic flow
- TfL will also be implementing a London Permit Scheme with 14 of the London Boroughs to better coordinate streetworks, and will now have the power to stop works which cause significant traffic problems in the capital
- in addition, the London Traffic Control Centre (LTCC) and the Roads Response Team are able to monitor and respond to congestion as it occurs and there could be further deployment of officers
- the Mayor has also said that he intends to look at developing a penalty system for roadworks which continue to cause delay

Other areas of activity will include re-phasing traffic lights to improve traffic flow and allowing motorcycles to use bus lanes on Red Routes (on an 18-month trial basis from January 2009). TfL could also implement SCOOT more widely to enable more effective management of traffic flows.

The Mayor is also reviewing major schemes with a potential impact on road capacity (the decision not to proceed with the pedestrianisation of Parliament Square was in part as a result of concern about the negative impact on traffic flow).

TfL would prioritise the implementation of ‘smoothing traffic flow’ schemes in the Western Extension should the Mayor be minded to remove the scheme.

Potential mitigation measures for environmental impacts

It is important to understand the impacts of the potential changes to the Western Extension in the context of other transport initiatives which reduce the impact of vehicle emissions. This should help to inform a general assessment of the possible mitigation measures which could be put in place.

While the options to remove or change the Western Extension would result in some increases in vehicle emissions, these would be relatively limited and would not be likely to have a material effect on measured air quality inside the Western Extension area or boundary route, or elsewhere in London. Nevertheless, the Mayor and TfL continue to have an important role in both reducing and mitigating the adverse impacts of transport on the environment.

As noted in the Supplementary Information, improvements to vehicle fleet technology have already accounted for reductions in vehicle emissions of both air quality pollutants and CO₂ and this is projected to continue. There are a number of reasons for this improvement, not least the Euro standards set by the European Union (EU), which determine the maximum levels of air quality emissions for new vehicles sold in the EU and with which all vehicles must comply when manufactured. These Euro standards are tightened over time. In terms of CO₂ emissions, demand for cars with lower levels of CO₂ emissions has been driven at least in part by the announcement in the 2008 Budget of increases to Vehicle Excise Duty (VED) levels for cars registered since March 2001 which have the highest CO₂ emissions, and reductions for those with lower levels of these emissions. Concern about rising fuel costs is also likely to have increased some drivers’ preference for smaller, more fuel-efficient and less polluting cars.

It is worth noting that many initiatives to tackle emissions from transport – at the local, London-wide, national and international level – are already in place which have been successful in reducing CO₂ and air quality emissions. The continuing contribution of these initiatives needs to be understood as part of the overall context for managing the impact of any changes to the Western Extension, as well as future plans within London which will be developed as part of the revised Transport Strategy.

While the following is not intended to be a complete list, it provides an overview of TfL's current approach to managing the environmental impact of transport; as well as an indication of how this might be further developed:

- **The original Congestion Charging scheme:** encouraging a shift away from private car use will remain one of the overall objectives of the Congestion Charge even if the Western Extension is removed. It will also continue to seek to encourage those who choose to drive to choose less-polluting vehicles. Vehicles which run on alternative fuels, and which meet strict criteria for emissions of air quality pollutants, are eligible for a 100% discount from the Congestion Charge (through the Alternative Fuel Discount). Electric vehicles are exempt from the Congestion Charge
- **The Low Emission Zone (LEZ):** seeks to improve air quality in London deterring those vehicles with the highest emissions of air quality pollutants, such as older, diesel-engined lorries, coaches and buses, from entering the capital. In London, road transport is the single biggest source of the air quality pollutants Particulate Matter (PM₁₀) and oxides of nitrogen (NO_x), and the LEZ encourages operators to use vehicles which meet specified emissions standards (Euro standards)
- **Smarter driving:** TfL runs information campaigns on ways in which drivers can reduce fuel consumption and vehicle emissions by making changes to their driving style and improved vehicle maintenance (sometimes known as 'eco-driving'). TfL is working with the freight industry in this area, for example the Freight Operator Recognition Scheme (FORS) provides training and incentives for improved fuel efficiency and environmental performance
- **TfL's vehicles and operations:** TfL continues to identify opportunities within its own operations to reduce the adverse environmental impact of transport. Hybrid buses are being introduced to the fleet (all new buses entering service from 2012 will be hybrid), and hydrogen buses are being trialled. London's 'new Routemaster', scheduled for introduction to service in 2011, will have a hybrid engine. The Mayor has signalled his intention to encourage the development and use of electric and hybrid vehicles in the capital
- **Helping people to make sustainable travel choices:** this includes providing better information to Londoners about public transport, walking and cycling. This approach builds on a number of successful initiatives including personal travel planning, and the promotion of lift-sharing and car clubs. School Travel Plans (which help schools by, for example, funding cycle parking facilities and providing advice on car-sharing schemes) have successfully reduced the number of school run car journeys
- **A new cycle-hire scheme for London:** a central London scheme will be in place by 2010, accompanied by improvements to cycling facilities to encourage more people to use cycles, reducing reliance on motorised transport
- **Smooth-flowing traffic:** the Mayor's ambition to smooth traffic flow to deliver not only benefits in terms of traffic movement but also environmental benefits is set out in "Way to Go!". Measures include reviewing traffic lights, implementing stronger measures to manage roadworks, and a trial allowing motorcycles in bus lanes on red routes.

Mitigating impacts on TfL finances

Changes to the scheme would affect the level of revenue generated by the scheme, which, by law, is used to improve transport in London. There would be one-off costs associated with making changes to the scheme as well as ongoing reductions to revenue once the changes were in place.

TfL estimates that the removal of the Western Extension could reduce overall net revenues by up to £70 million per annum; the introduction of payment accounts would also reduce revenues. In the context of major investment in Crossrail and the London Underground upgrade programme, there are significant pressures on TfL funding.

TfL is focusing further work on trying to minimise the potential reductions in revenues. Some savings are already built in to the agreement with IBM, which will be the new service provider for the Congestion Charging scheme from late 2009 and TfL will continue to seek to bear down on costs.

The ten year TfL Business Plan, published on 6 November 2008, notes that there is a major review of operating costs, focusing both on the control of overheads and further exploitation of efficiencies within its operations. However, the Business Plan does not assume the removal of the Western Extension, nor does it incorporate funding for any mitigation measures. Further ways to address the deficit will thus be required and there may inevitably be broader implications from the removal of the Western Extension and reduction in revenue. This would need to be considered further in the context of the TfL Business Plan and as part of the longer term approach through the development of the Mayor's Transport Strategy.

Furthermore, the Mayor would need to consider the timing for removing the Western Extension in relation to not only what, but how quickly, mitigation measures across these different aspects can be put in place.

Next Steps

It is important to note that Congestion Charging is just one element of the overall Transport Strategy in London. Any changes to the Congestion Charge would need to align with the overarching approach set out in the Mayor's Transport Strategy. The GLA Act requires the Mayor to develop and implement policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London. The Mayor's policies and proposals for achieving this are set out in the Mayor's Transport Strategy (MTS).

Under the Greater London Authority Act 1999, the introduction or amendment of road user charging schemes (such as Congestion Charging) in London must be in conformity with the Mayor's Transport Strategy. The Act also requires that both the publication (or revision) of the Transport Strategy must be subject to consultation with certain statutory consultees, though previously the publication and revision of the Transport Strategy have been subject to full public and stakeholder consultation. Alongside the Transport Strategy consultation, an Environmental Report would be required.

Currently, TfL is preparing a revised MTS on behalf of the Mayor on which it is planned to consult in 2009. This will take the form of a London Assembly and Functional Body consultation followed by a twelve-week public consultation. The new MTS will provide the context in which any changes to the Congestion Charge are taken forward. Congestion Charging is only one of a number of ways in which congestion is tackled in London. The MTS will set out the Mayor's policies and proposals for traffic management and other objectives, and the potential removal of the Western Extension needs to be considered in this overall context.

In November 2008 the Mayor launched “Way to Go!” – Planning for Better Transport (Nov 2008). The Mayor has invited comments on this ‘direction of travel’ document which will inform drafting of the Mayor’s Transport Strategy. “Way to Go!” sets out at a high level the principles for approaching the various transport challenges that London must deal with in the coming years. These include helping people to choose sustainable alternatives to the car; developing outer London; working in partnership with the boroughs; making the network accessible to all and identifying which projects will ensure good value for Londoners’ money in the future, as well as making cost savings on current activities.

The Western Extension could not be removed until spring 2010 at the earliest and if other changes were to be made, most would require a longer implementation period. In part, this timescale reflects the need for more detailed development of specific proposals and the statutory procedures and consultations that would be required for their implementation. This will also allow time to address the mitigation issues as set out above. In addition, this timescale takes account of the timing of the transfer of Congestion Charging scheme operations to a new service provider, IBM, to ensure that any changes would be made in the most economic and efficient manner, thereby ensuring value for Londoners’ money.

Once a revised Transport Strategy is in place, TfL could then conduct a public and stakeholder consultation on a variation to the Congestion Charging Scheme Order. As part of such a consultation, specific changes would be proposed, and a draft, marked-up version of the existing Scheme Order would be provided. It is only once the Mayor has confirmed a Variation Order that TfL could remove the Western Extension. It should be noted that in confirming a Variation Order, the Mayor can confirm the variation as proposed, with modifications or not at all.

Currently, it is planned that the Assembly and Functional Bodies consultation on a draft Transport Strategy would start in spring 2009, following the consultation on the Way to Go! which was published by the Mayor on 5 November. This would be followed by a public consultation in the summer, with the final Transport Strategy published in early 2010. Consultation on a Variation Order to remove or change the scheme would follow and, subject to this, come into effect in spring 2010.

It should be remembered that the conditions in which the Congestion Charge operates will continue to change as time goes on. TfL will continue to monitor the effects of the scheme and identify the need for improvements and changes, notwithstanding any changes that the Mayor may wish to make as a result of this consultation.

Chapter 5: Recommendations

The Mayor made very clear his commitment to listening to the views of Londoners about the future of the Western Extension and abiding by the results. This informal consultation was an opportunity for the public and businesses to make their views known.

The results show a strong overall preference for the scheme to be removed.

The majority of the public and businesses who responded to the consultation supported the removal of the Western Extension. Those living or based within the Western Extension zone have a strong preference for it to be removed – more than half (57%) of WEZ residents, and 89% of businesses in the WEZ, responding to the consultation supported its removal.

The attitudinal survey conducted alongside the consultation also showed a preference among both public and businesses for removing the Western Extension. While this was not as strong as in the consultation itself, it was still the most preferred option, supported by 41% of individuals and 50% of businesses.

Views from stakeholders were more mixed, with more supporting keeping or changing the scheme than removing it.

On the basis of these results it is recommended that the Mayor express that he is minded to remove the Western Extension and that he takes the necessary next steps to do so.

In doing so, the Mayor has to be mindful of his responsibilities for reducing congestion and emissions, and so ensure that measures to mitigate any increases in these, that may be likely as a result of removing the Western Extension, are also taken.

Therefore we would recommend that the removal of the Western Extension is taken forward as part of a broader revision of the Mayor's Transport Strategy to enable proper consideration to be given to mitigating the impacts and ensuring that, overall, a package of policies which on balance is positive for transport, the environment, health and sustainable development, is developed.

The timing for the potential removal of the Western Extension also needs to be considered in relation not only to what mitigation measures can be put in place, but also how quickly. This should be addressed as part of the broader approach to transport and the environment which is provided by the Transport Strategy and the Mayor's other strategies.

TfL has already begun tackling congestion through enhanced road and traffic management and there is scope for this approach to be expanded, for example by re-phasing traffic lights to improve traffic flow. A number of schemes have also been put in place which will help to reduce the number and duration of road works. We would recommend that the application of these measures should be prioritised for implementation in the Western Extension area in anticipation that the scheme will be removed. Furthermore, with regard to emissions, a number of initiatives which improve air quality and reduce CO₂ emissions from road transport are already in place. The continuing contribution of these initiatives – and what more can be done – needs to be considered further, in the anticipation of the scheme being removed, and as part of the development of the Transport Strategy and the Mayor's other Strategies.

In addition, the Mayor will need to consider how the loss of the substantial net revenues from the Western Extension could be offset in the TfL Business Plan and how such mitigation measures that need to be introduced can be funded.

As well as a revision of the Transport Strategy, removal of the Western Extension will also require a formal variation to the Congestion Charging Scheme Order. These are both statutory procedures, and include public consultation which cannot be pre-judged.

In practical terms, the Western Extension could not be removed until spring 2010 at the earliest. This timescale reflects the need for these statutory procedures. In addition, this timescale takes account of the transfer of Congestion Charging scheme operations to a new service provider in order to guarantee that any changes would be made in the most economical and efficient way and to ensure the greatest value for Londoners' money.

The consultation also considered possible changes to the Congestion Charging scheme which the Mayor may still want to consider applying to the original zone even if he wishes to take forward a formal consultation on removing the Western Extension. Of the specific change options proposed, an account-based payment system emerged as a popular option and a number of stakeholders said that they favoured this regardless of whether the Western Extension was removed. This is a manifesto commitment made by the Mayor. It was also the most favoured change option by both business and individual respondents to the consultation, despite some concerns about privacy and security of data.

There would be additional financial implications of introducing accounts in the original zone over and above the reductions in net revenue associated with the potential removal of the Western Extension. This would create additional pressures in the TfL Business Plan and reduce the monies available for investment in transport in London. The benefits to users from accounts, for example in terms of reduced "hassle" and fewer PCNs, must be weighed against this.

The Mayor must give all these factors careful consideration before confirming how he is minded to proceed.

**Transport for London
November 2008**