

Appendix 1

Analysis of representations received to the Variation Order consultation

Representations have been categorised into ‘themes’ and ‘sub-themes’ according to the issue being considered, along with TfL’s conclusions. This means that a representation from a respondent dealing with more than one issue will be split accordingly and dealt with under the appropriate themes or sub-themes.

Some of the representations received did not concern the content of the Variation Order; rather they concerned congestion charging more generally. These representations and objections are considered under the theme ‘Other Issues’.

Proposed Variation: The intention is to bring forward the implementation date for the Pay Next Day facility from 18 September 2006 to 19 June 2006.

Sub-theme	Respondent	Representations	TfL Response
	City of Westminster	Welcomes this proposal as it would provide the motorist with an agreeable grace period of a full day after they have entered the zone. The City Council has consistently lobbied for this initiative to be brought forward before the originally promised September 2006 date. Therefore by introducing the pay next day facility on 19 June 2006 this proposed scheme order is welcomed.	Support Noted.
	Royal Borough of Kensington & Chelsea	The Council is pleased to see the introduction of the pay next day facility and welcomes the fact that it will be brought forward from September to June. We hope that TfL will continue to look for ways of making it easier to pay the charge.	
	London Borough of Southwark	Bringing forward the date of the 'pay next day' facility to 19 June is welcomed. It is hoped that this will encourage a greater compliance with the scheme and reduce the number of offenders and requirements for pursuing non-compliant motorists.	
	City of London Police	The Commissioner of Police for the City of London supports the four proposals.	
	London First	Able to confirm London First's full support for the implementation of the 'Pay Next Day' facility. Have long campaigned for enhancements to the congestion charging scheme to reduce the hassle factor and as such we warmly welcome this modification.	

	1 Member of the public supported this variation.		
Support for the variation with additional comments	City of Westminster	It is understood that the administration fee to make use of this facility will be £10 and that drivers who forget to pay on a Friday will have the full duration up to and including Monday to then submit payment.	TfL are not proposing to levy an administration fee for the Pay Next Day facility. The proposal is that charge payers should pay £8 up until midnight on the day of travel within the charging zone (removing the £2 surcharge which currently applies between 10pm and midnight); and thereafter to pay £10 up until midnight on the day following travel (up to midnight on Monday for journeys made the previous Friday).
No objections to the Variation	London Borough of Wandsworth	Have no observations to make on the specific proposals being consulted on.	Position Noted
	London Borough of Richmond	The Order would not appear to have any adverse effects on the residents or businesses of this borough. Therefore have no comment to make on the Order.	

Proposed Variation: To waive the £10 charge for the registration of all Residents' discount applications received from 20 October 2006 until 19 January 2007 for residents of the western extension residents' discount zone. Residents of the extended discount zone who are successfully registered by TfL for the residents' discount will be granted 90% discount status for journey into the existing central zone with effect from the date when discount status is granted.

Sub-theme	Respondent	Representations	TfL Response
Support the Variation	City of Westminster	Given that, for the first time and at the same time, thousands of residents in the new western extension area will be required to apply for the 90% residents' discount, it is agreeable that the usual £10 registration fee will be waived as long as they apply within the earlier period of 20 October 2006 to 19 January 2007. Hopefully this will quell any last minute rush for such discount applications before the scheme goes live in February 2007.	Support Noted.
	London borough of Southwark	We understand and support the waiving of the £10 charge for all residents' applications received early (between 20 October 2006 and 19 Jan 2007). This should reduce a peak in applications before the introduction of the extension and reduce the level of non-compliance after implementation.	
	City of London Police	The Commissioner of Police for the City of London supports the four proposals.	

<p>Support for the Variation with additional comments</p>	<p>City of Westminster</p>	<p>The wholesale waiving of the £10 registration fee for residents in both the existing zone and the western zone for the period 20 October 2006 to 19 January 2007 is supported.</p> <p>It is disappointing that residents of the existing central zone will not enjoy the same concession over this period. Given that these residents will continue to apply for discount entitlement during that period, the City Council requests that TfL considers extending the waiving of the £10 charge to these residents also. This position is strengthened by the belief that all Blue Badge holders will enjoys such a concession, irrespective of whether they live in the existing zone or the western zone.</p>	<p>TfL does not consider it appropriate to extend the temporary incentive to residents of the existing scheme, as the purpose of the incentive is to encourage the early registration of residents in the western extension. This will help ensure that discounts are in place for new residents if they apply in good time. A similar approach was adopted when the existing scheme was introduced.</p> <p>The incentive is for a limited period only and enables TfL to manage the processing of applications in a timely and efficient manner.</p> <p>It is appropriate for TfL to offer the same incentive to Blue Badge holders, particularly to target those who are resident of the western extension zone and who are not registered for the current scheme. TfL would not want to disadvantage those who are eligible for this scheme.</p>
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<p>Support waiving fee, but object to early entry into existing zone.</p>	<p>London Borough of Camden</p>	<p>Whilst the idea of waiving the £10 registration charge for residents' discount applications which are made early is consistent with the arrangements made when the original scheme was introduced, and is sensible in order to prevent the application processing system from becoming clogged by last minute applications, we have reservations about the need for the 90% discount being available immediately after confirmation of the discount for journeys made into the existing zone. Camden has previously objected to the principle of the single residents discount zone, so you will appreciate that we do not agree that the incentive for residents in the western extension to make these trips should be available even before the extension comes into operation.</p>	<p>The Mayor confirmed the western extension on 30 September 2005. This included a single residents' discount zone for the whole of the enlarged zone. This proposal focuses on further encouraging residents of the extended zone to apply early for their discount. This will further help relieve the risk of delayed applications and unnecessary delays in the processing of these applications. Like all aspects of the scheme, the single zone for residents will be kept under review.</p> <p>Residents who register early will be able to drive in the existing zone for a short period prior to the introduction of the enlarged zone. TfL considers that the detrimental traffic impacts of this change are marginal.</p>
<p>No Objections to the Variation</p>	<p>London Borough of Wandsworth</p>	<p>No observations to make on the specific proposals being consulted on.</p>	<p>Position Noted</p>
	<p>London Borough of Richmond</p>	<p>The Order would not appear to have any adverse effects on the residents or businesses of this borough. Therefore have no comment to make on the Order.</p>	

Proposed Variation: The £10 charge for the registration of a Blue Badge holder (individual and institution) discount to be waived for registration from 20th October 2006 until 19 January 2007.

Sub-theme	Respondent	Representations	TfL Response
Support for the Variation	London Borough of Southwark	Similarly the reasons behind waiving the £10 charge for early registration of Blue Badge holders	Support Noted.
	City of London police	The Commissioner of Police for the City of London supports the four proposals	
	Mobilise	Mobilise welcomes waiving the registration fee from October 2006 to January 2007.	
No Objections to the Variation	London Borough of Wandsworth	No observations to make on the specific proposals being consulted on.	Position Noted.
	London Borough of Richmond	The Order would not appear to have any adverse effects on the residents or businesses of this borough. Therefore have no comment to make on the Order.	

<p>Other comments on the Variation</p>	<p>Mobilise</p>	<p>Mobilise Organisation would like confirmation that TfL intends to exempt all disabled residents and non-residents holding a valid Blue Badge from paying the Congestion Charge when entering and leaving the western extension zone as they are for the current central zone. Mobilise Organisation wishes to know how the scheme is to be publicised to Blue Badge holders. It requests TfL to pay Mobilise to inform its members living in the western extension area of its decision. Mobilise requests that TfL publicises the exemption to all members in the UK by way of advertising in its national member's magazine, No Limit. The purpose of No Limit is to up-date members about personal transport issues. If publicity does not reach individuals they will ring us and our information officers will not be able to deal with the volume of calls. The consequence of not exempting those in the western extension from paying Congestion Charge would be to discriminate against those in certain postcodes.</p>	<p>TfL can confirm that all Blue Badge holders are eligible for a 100% discount from the Congestion Charge. TfL works with stakeholder groups to ensure that all those who are eligible for the discount are aware of the extended zone. Any queries regarding the scheme can be directed both to the Congestion Charging call centre and the website.</p> <p>TfL does not consider it appropriate to pay Mobilise to inform its members living in the western extension. TfL intends to advise all Blue Badge holders in Greater London of the extended zone and the operation of the scheme by deploying various methods to communicate directly with our stakeholders including using direct mail.</p> <p>The current administration of the Blue Badge discount is operating successfully. There are over 100,000 people registered to receive the Blue Badge discount.</p>
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Proposed Variation: To increase temporarily the maximum length of time that TfL can take to process discount applications from 10 charging days to 20 charging days between 20 October 2006 and 16 March 2007.

Sub-theme	Respondent	Representations	TfL Response
Support for the Variation	London Borough of Southwark	Temporarily increasing the length of time to process applications from 20 October to 16 March is accepted.	Support Noted.
	City of London Police	The Commissioner of Police for the City of London supports the four proposals.	
Support for the Variation with additional comments	London Assembly Conservative Group	The motivation is presumably to mitigate problems of a high demand that TfL are anticipating during this period. At present, I understand from TfL officers that the western extension is due to come into force in February 2007. If that is indeed the case, I would suggest that the period of extended processing time ought to end on January 19, or thereabouts, since otherwise those applying after that date would risk incurring fines if the extension came into play whilst they were still waiting 20 days for a permit.	<p>At present the Service Level Agreement with the Service Provider [Capita] is to process 100% of Discount Applications within 9 days. This has not been changed as part of the agreement to implement the Western Extension and all communications with customers will indicate that the time that should be allowed to process a discount is 10 days.</p> <p>In practice, the actual time taken to process a Discount Application is currently typically 3-4 days although this period can extend at busy times. It is for this reason that TfL is seeking to encourage residents of the WEZ to apply for their discounts in good time and avoid an overly busy period prior to the commencement of charging in the WEZ.</p> <p>During the go live of the existing scheme some discount application cases were more complicated than the norm and there was a rush of applications close to go live. There is a</p>

			<p>possibility that some of these cases may take longer than 10 days (as allowed in the Scheme Order) to process. TfL believes it to be appropriate to avoid knowingly contravening the Scheme Order and so has sought to temporarily amend the Scheme Order to allow for such cases.</p> <p>In the event of a particular discount registration being identified as a special case then it is TfL's policy for the Service Provider to contact the applicant directly to 1) attempt to resolve the identified issue as soon as possible and 2) in those cases where charging has or is likely to have commenced to remind the applicant that should they need to drive in the charging zone, they would need to pay the congestion charge at the standard rate. If a discount is subsequently granted and the delay was due to the fault of TfL or its Service Provider, TfL would offer to reimburse the customer the difference between what they had paid and what they would have paid had the discount been processed within the published 10 day timescale.</p>
<p>Other Comments Publicity and Application Processing</p>	<p>Mobilise</p>	<p>Mobilise wishes to draw to the attention of TfL the importance of the car to disabled drivers and passengers. A car is not a luxury; it is a necessity to keep a disabled person mobile. For many the journey is NOT possible without the car. The journey may well be essential for example for work, for taking children to school or to visit a lawyer. If a disabled person has to wait beyond the start of the scheme to be registered they will have no choice but to pay the Congestion Charge and thus suffer</p>	<p>See representation above</p> <p>The 100,000 Blue Badge holders already registered with TfL for the Congestion Charging 100% discount will automatically enjoy the benefits of the extended zone from go live in February 2007.</p> <p>It is likely that a large proportion of residents of the western extension area who are eligible for a</p>

		discrimination (assuming they are to remain exempt). To avoid preventing disabled people from making essential journeys Mobilise Organisation requests that registration of Blue Badge holders is fast-tracked and the time taken to process should not be lengthened beyond the start of the scheme in February 2007. Should a backlog of registration occur holders of the Blue Badge should be prioritised.	Blue Badge discount are already registered for the existing Blue Badge discount. TfL does not therefore anticipate any difficulties with registering additional Blue Badge holders for the Congestion Charging discount.
No Objections to the Variation	London Borough of Wandsworth	No observations to make on the specific proposals being consulted on.	Position Noted.
	London Borough of Richmond	The Order would not appear to have any adverse effects on the residents or businesses of this borough. Therefore have no comment to make on the Order.	

Other Issues:

The representations and objections under this section do not relate to the proposed variations, but concern congestion charging more generally.

Sub-theme	Respondent	Representations	TfL Response
Western Extension Residents Discount Areas	London Borough of Wandsworth	We would appreciate as a matter of some urgency an update in respect of related issues concerning the residents' discount area; specifically the Mayor of London's request that TfL consider a discount area in Battersea and the Leader of the Council's subsequent letter to the Mayor on this matter.	TfL are finalising a Report to the Mayor on this issue for the Mayor's consideration.

TfL considers that as a result of representations received under the theme "Other issues" no changes to the Scheme Order are necessary.