

F Analysis of Representations to the December 2001 Consultation

F.1 Introduction

F.1.1 After considering the representations received in the July 2001 consultation and other developments since July 2001, TfL proposed a number of modifications to the Scheme Order. A second round of consultation was carried out in December 2001 on TfL's proposed modifications to the Scheme Order. An analysis of the representations and objections received during the second consultation period is presented in this Annex.

F.1.2 Many respondents to the second consultation did not make representations about particular modifications, but raised issues about other aspects of the Scheme Order or more general issues associated with the congestion charging scheme proposals. This element of the response covered many of the same themes raised during the first consultation period, which are reported in Annex C. This Annex deals with all of the key issues raised during the second period of consultation, but the focus is on representations received on the proposed modifications to the Scheme Order.

F.1.3 The Annex is structured as follows:

- Section 2 Caveats to the Analysis - Comments on interpretation of the data presented.
- Section 3 Overall Nature of the Consultation Response - Presents an overview of the representations received during the second consultation.
- Section 4 Representations Concerning Proposed Modifications to the Congestion Charging Scheme - Analyses the representations received concerning the proposed modifications to the Scheme Order.
- Section 5 Representations Concerning Unmodified Aspects of the Congestion Charging Scheme - Analyses the representations received concerning issues other than the proposed modifications to the Scheme Order.
- Section 6 Summary - Overview of the findings of the second period of consultation.

The Consultation Exercise

F.1.4 As with the first round of consultation on the Scheme Order, respondents were divided into 'Stakeholders', 'Other Organisations' and 'Individual Members of the Public'. Stakeholders are those 500 key organisations who were sent a detailed information pack for the first round of consultation on the Scheme Order. The stakeholders included, *inter alia*, all the London Boroughs and the local authorities surrounding Greater London, Members of the London Assembly, MP's and MEP's with constituencies within Greater London, business representative groups, groups representing the interests of disabled persons, all NHS Trusts and Health Authorities within Greater London, motoring organisations, bus and train operators, and groups representing the interests of different national/ethnic, religious, and voluntary groups. Other Organisations are those organisations or institutions that responded to the public consultation on behalf of the interests of a group, for example businesses, residents' associations etc.

F.1.5 At the start of the second period of consultation, all 500 Stakeholders were sent a new information pack containing details of the proposed modifications. Other Organisations and Individual

Members of the Public that had responded to the first consultation on the Scheme Order were sent a letter or email advising them of the opportunity to comment on TfL's proposed modifications, and directing them to TfL's website for further information.

- F.1.6 As well as targeting respondents to the first consultation as detailed above, TfL also elicited representations from 'new' respondents, through media including information posted on the internet and street notices.

Volume of Response

- F.1.7 The total number of representations received and analysed for the second period of consultation was as follows:

- Stakeholders	84
- Other Organisations	97
- Individual Members of the Public	352
- TOTAL	533

- F.1.8 Representations received in the form of a petition were treated as one single representation for each petition received. The number of signatures for each petition was recorded, and a summary of the petitions received can be found in Appendix A to this Annex.

- F.1.9 It should be noted that a number of representations to the December 2001 consultation on TfL's proposed modifications to the Scheme Order were received too late to be incorporated in this quantitative analysis. However, most of these late representations are included in TfL's consideration of representations and objections at Annex G.

- F.1.10 The Stakeholders responding to the second round of consultation comprised the following types of organisations:

London Boroughs	16
NHS Trusts/Health Authorities	11
MPs/MEPs/Members of the House of Lords	9
Groups Representing Disabled Persons	8
Business Group Representatives	7
London Assembly Members	7
Emergency Services	4
Freight Haulage Groups	3
Motoring Organisations	3
Utilities	3
Other Local Government Associations	3
GLA Functional Bodies	2
Professional Organisations/Institutions	2
Transport Partnerships	2
County Councils/Unitary Authorities Bordering Greater London	1
Environment/Transport Lobby Groups	1
Taxi/Mini Cab Associations	1
Voluntary/Community/Non-profit Making Organisations	1
TOTAL	84

F.1.11 The Other Organisations comprised the following:

Businesses	48
Residents' Associations/Local Amenity Groups/Societies	24
Voluntary/Community/Non-profit Making Organisations	14
Educational Establishments	4
Environment/Transport Lobby Groups	3
Groups Representing Disabled Persons	2
Trade Unions	2
TOTAL	97

F.1.12 The level of response for the December consultation was lower than the July 2001 consultation, when representations were received from 149 Stakeholders, 232 Other Organisations and 1893 Individual Members of the Public. This was to be expected as the second consultation concentrated on the proposed modifications to the Scheme Order rather than the scheme as a whole. It is likely that many did not feel the need to add to the representations that they had made during the consultation in July 2001.

F.1.13 The analysis of representations that follows is divided into subject headings, under which the comments of respondents are grouped. For example, a section on public transport considers a wide range of different representations by all respondents who commented on that subject. At the start of each section the total number of respondents making a representation on the subject is given. However it must be noted that, as respondents often made more than one specific representation on each subject considered, the total number of representations listed is usually greater than the number of respondents identified.

F.1.14 When analysing the representations to the consultation, best endeavours were made to accurately record all of the representations and objections. However it is recognised that the results may not be perfectly representative, due to the possibility of misinterpretation or inaccuracies when categorising data. Nevertheless, all representations and objections to the congestion charging scheme are presented more fully in Annex G. In addition, all representations to the consultation have been copied to the Mayor.

F.2 Caveats to the Analysis

F.2.1 As with the findings of the first round of consultation, the figures presented in this Annex must be interpreted with caution. As noted at paragraph F.1.12, some of those who had responded to the first consultation may not have felt the need to add to their representation; particularly if their concerns about the scheme had now been met, or if they were supportive of congestion charging and did not wish to comment further.

F.2.2 This was not a poll of general public or business opinion in London. Even amongst Stakeholder organisations whose views were particularly solicited, representations have come principally from those with concerns about the proposed congestion charging scheme. Respondents were self-selecting, and tended to be the ones who held particularly strong opinions – especially those who saw the second round of consultation as their last opportunity to voice their opposition to the scheme.

F.2.3 There was in this round, therefore, a potential skew towards those who oppose the scheme and/or whose concerns had not been addressed by the proposed modifications. For these reasons, and given the lower level of response, it is not appropriate to compare the results of the second round of consultation to those from the July consultation.

F.3 Overall Nature of the Consultation Response

F.3.1 Representations were divided into different categories according to the nature of the support or opposition expressed towards the congestion charging scheme. The results are shown in Table 1. However, in many cases it was not possible to state with certainty whether a respondent supported or opposed the congestion charging scheme, as they did not say so explicitly. Inferring a respondent's support or opposition from the tone of their response would have been highly subjective.

F.3.2 There may also be an important distinction between support for the principle of congestion charging in London, and support or opposition to particular aspects of the Scheme Order. Particularly in this round of consultation, many respondents appeared to focus on certain specific aspects of the Scheme Order, which reflects the nature of this consultation – a chance to home in on particular outstanding issues of concern.

F.3.3 The caveats expressed in Section 2 should therefore be noted when interpreting these results, as comparison between these figures, and figures from the first consultation or from more representative opinion polls, is not valid. Although at first sight this data appears to indicate a shift of opinion against the scheme compared to the last round of consultation, this is not a reliable conclusion to draw.

Nature of response	Stakeholders	Other Organisations	Individual Members of the Public
Stated support with reasons	1	3	5
Supported scheme and modifications generally	1	1	4
Stated support, no reasons given	0	0	6
Stated support with caveats	22	13	23
Stated opposition with reasons	14	34	136
Stated opposition, no reasons given	0	1	3
Support/opposition not stated explicitly	46	44	169
Asked questions only	0	1	6
<i>Totals</i>	<i>84</i>	<i>97</i>	<i>352</i>

Table 1: Support or Opposition to the Congestion Charging Scheme by Respondent Type

F.3.4 The greatest number of representations stated no overall position of support or opposition to the congestion charging scheme explicitly, but raised specific issues of concern to the respondent. Excluding these representations, the balance amongst representations from Other Organisations and Individual Members of the Public was towards opposition to the scheme, whilst amongst Stakeholders the balance was in favour of the scheme as a whole, albeit with caveats.

F.3.5 The overwhelming balance of most representations was towards aspects of the proposed congestion charging scheme that are not affected by the proposed modifications: even amongst Stakeholders

there were relatively few representations on the proposed modifications. This is illustrated in Section 4. Many respondents used this round of consultation as another opportunity to comment on issues other than the proposed modifications.

F.3.6 Nevertheless, since the main purpose of this round of consultation was to elicit representations to the proposed modifications to the Scheme Order, the next section is concerned with the modifications, with representations relating to the unmodified aspects of the scheme following in Section 5.

F.3.7 To provide an overview of the data, the 15 most frequently mentioned representations, for each group of respondents, are presented in the three tables below. Comparison of these tables provides an impression of how the priorities of different respondent groups vary.

Rank	Representation	Stakeholders
1	Costs to business may increase	20
2	Support new discount for operational travel by certain NHS staff	20
3	Public transport must be improved first	16
4	Propose extension of the new NHS discount to more staff/journeys	14
5	Concerned about reduced estimate of net revenues	14
6	Support extension of discount for Public Service Vehicles	14
7	Support change to the charging hours – to end at 6.30pm rather than 7.00pm	14
8	Propose new discount for carers/charity workers	12
9	Propose changes to the form of the fleet account facility	11
10	Support extension of Blue Badge discount to Europe	11
11	Previous representations have not been taken into account	11
12	Propose new discount for shift workers	11
13	Support new discount for Private Hire Vehicles	11
14	Problems for recruitment and retention may increase	11
15	Traffic at the charging zone boundary may increase	10
15=	Support extension of alternative fuel discount	10
15=	The timetable is premature	10
15=	Propose new discount for commercial vehicles	10

Table 2: Top Fifteen Most Frequently Mentioned Representations from Stakeholders

Rank	Representation	Other Organisations
1	Traffic at the charging zone boundary may increase	18
2	Public transport must be improved first	15
3	Costs to business may increase	14
4	Quality of life may deteriorate	13
5	Propose new discount for commercial vehicles	9
6	Call for Public Inquiry	8
7	Propose further extension of the alternative fuel discount	8
8	Support change to the charging hours – to end at 6.30pm rather than 7.00pm	7
9	The congestion charge is just a tax	7
10	Pollution at the charging zone boundary may increase	7
11	Previous representations have not been taken into account	7
12	Communities at the boundary may be severed	7
13	Kennington Lane should not be part of the charging zone boundary	7
14	Support extension of alternative fuel discount	6
15	Propose further reduction of the charging hours	6
15=	Congestion may not reduce as much as anticipated	6
15=	Propose new discount for carers/charity workers	6

Table 3: Top Fifteen Most Frequently Mentioned Representations from Other Organisations

Rank	Representation	Individual Members of the Public
1	Traffic at the charging zone boundary may increase	73
2	Congestion may not reduce as much as anticipated	54
3	Public transport must be improved first	51
4	Quality of life may deteriorate	43
5	The congestion charge is just a tax	39
6	Communities at the boundary may be severed	39
7	Pollution at the charging zone boundary may increase	39
8	Public transport improvements may not be ready in time	30
9	Previous representations have not been taken into account	27
10	Low income people may be unfairly affected	25
11	London is already expensive	25
12	The cost of living may increase	24
13	Kennington Lane should not be part of the charging zone boundary	24
14	Public transport is not viable for some journeys	24
15	Propose new discount for residents outside but near the charging zone (buffer zone)	23
15=	Propose new discount for shift workers	23

Table 4: Top Fifteen Most Frequently Mentioned Representations from Individual Members of the Public

F.4 Representations concerning TfL's proposed modifications to the Scheme Order

- F.4.1 In total, 59 Stakeholders, 28 Other Organisations and 60 Individual Members of the Public mentioned one or more of the proposed modifications to the Scheme Order (out of the total respondents of 84, 97 and 352 respectively). Thus, there were many representations received relating to the unmodified aspects of the scheme. There were in total 205 mentions of various modifications made by Stakeholders, 59 made by Other Organisations and 93 made by Individual Members of the Public. Representations tended to focus on specific modifications, rather than the package of proposed modifications as a whole.
- F.4.2 The representations concerning proposed modifications are reported below. As far as is possible this is done in order of importance across the respondent types in terms of the number of respondents raising them. However, given the different priorities of the three respondent types, this cannot be done precisely.
- F.4.3 In many cases, respondents simply noted their support (e.g., 'the modification is welcome' or 'we support this modification'), without giving any reason for doing so. It was also not uncommon for respondents to state opposition without any express reason (e.g., 'I am disappointed to see this modification'). Some respondents said only that a modification satisfied concerns expressed during the previous consultation. Conversely, some respondents made multiple representations on individual proposed modifications to the Scheme Order. The analysis below presents the substantive reasons given for support or opposition to the proposed modifications; and other points made about the modifications.
- F.4.4 It is important to note that not all representations concerning proposed modifications were unambiguously in support or opposition to the modification being considered. In some instances respondents supported the reasons for making a given modification, but were critical of the form of the modification proposed by TfL. Therefore it is essential to consider the *reasons* that respondents gave for 'support' or 'opposition' to the proposed modifications.
- F.4.5 Where relevant, additional representations made by respondents who may not be directly considering a modification, are discussed in this section. Specific representations additional to those identified below, made by 4 Individual Members of the Public or fewer, are listed in Appendix B.

Proposed Modification - Charging Hours – To End at 6.30pm rather than 7.00pm

- F.4.6 This proposed modification generated the greatest volume of representations with 20 Stakeholders, 8 Other Organisations and 23 Individual Members of the Public mentioning it.
- F.4.7 Those expressing support for the proposed modification formed the majority of these: 14 Stakeholders, 7 Other Organisations and 11 Individual Members of the Public.

The Stakeholders were:

- 6 London Boroughs;
- 2 Business Group Representatives;
- 1 GLA Functional Body;
- 1 Motoring Organisation;
- 1 Group Representing Disabled Persons;
- 1 Transport Partnership;
- 1 Voluntary/Community/Non-profit Making Organisation; and
- 1 NHS Trust/Health Authority.

The Other Organisations were:

- 3 Businesses;
- 3 Residents' Associations/Local Amenity Groups/Societies; and
- 1 Environment/Transport Lobby Group.

F.4.8 Respondents considered that the proposed modification would mitigate possible negative impacts of the scheme, particularly possible impacts on the evening economy and theatre-goers. Two London Boroughs noted that the 6.30pm end time meant a better fit between the congestion charging scheme hours and the timings of parking restrictions in London, reducing concerns about residents' parking spaces being occupied by commuters using them to 'park and ride'.

F.4.9 Those expressing opposition to the proposed modification were: 6 Stakeholders, 1 Other Organisation and 12 Individual Members of the Public.

The Stakeholders were:

- 3 London Boroughs;
- 1 GLA Functional Body;
- 1 Environment/Transport Lobby Group; and
- 1 MP/MEP/Member of the House of Lords.

The Other Organisation was a Business.

F.4.10 3 Stakeholders and 2 Individual Members of the Public argued that congestion is still a problem after 6.30pm, and there were concerns that this would now be exacerbated by a 'rush' into the charging zone at 6.30pm. Another Stakeholder (a GLA Functional Body) questioned why the entertainment sector should receive 'special attention', as opposed to other parts of the economy.

F.4.11 Opinion amongst respondents as a whole appeared divided over the overall length of the charging period (an issue discussed further at paragraph F.5.60). 2 Stakeholders, 6 Other Organisations and 9 Individual Members of the Public wanted the hours reduced further; and 4 Stakeholders, 1 Other Organisation and 11 Individual Members of the Public wanted the hours extended.

Proposed Modification - New Discount for Operational Travel by Certain NHS Staff

F.4.12 This proposed modification generated quite a large volume of representations with 23 Stakeholders, 4 Other Organisations and 11 Individual Members of the Public mentioning it.

F.4.13 Those expressing support for the modification formed a clear majority of these: 20 Stakeholders, 4 Other Organisations and 6 Individual Members of the Public.

The Stakeholders were:

- 8 NHS Trusts/Health Authorities;
- 5 London Boroughs;
- 2 Groups Representing Disabled Persons;
- 2 MPs/MEPs/Members of the House of Lords;
- 1 GLA Functional Body;
- 1 Motoring Organisation; and
- 1 Professional Organisation/Institution.

The Other Organisations were 3 Businesses and an Environment/Transport Lobby Group.

F.4.14 Respondents considered that the discount would reduce the costs of the congestion charge to the NHS. However, while welcoming the discount, 4 NHS Trusts/Health Authorities were concerned about the possible administrative burden.

F.4.15 Many of the supporters of the proposed modification expressed reservations: they considered that the discount should be more widely applied to NHS staff and journeys: 14 Stakeholders and 3 Individual Members of the Public. In particular, 4 Stakeholders mentioned staff working 'on call' or travelling between hospitals; and 5 Stakeholders mentioned staff working in the community. 6 respondents argued for the discount to be extended to NHS staff driving to work, particularly those on shifts, and those bringing children to childcare facilities. 1 Stakeholder was concerned that the charge would effectively 'wipe out' the creche subsidy for NHS staff. 2 Stakeholders were concerned that agency and locum staff were not included in the scope of the discount. In addition, 1 Stakeholder and 3 Other Organisations considered that the discount should be extended to non-NHS doctors making patient calls in the charging zone.

F.4.16 Those expressing opposition to the modification were 3 Stakeholders and 5 Individual Members of the Public.

The Stakeholders were:

- 1 London Assembly Member;
- 1 Business Group Representative; and
- 1 London Borough.

F.4.17 The London Assembly Member argued that the NHS should not incur any expenses as a result of the congestion charging scheme, and that therefore the proposed discount was inadequate. This respondent considered that the NHS should be able to nominate certain vehicles for inclusion on the discounts register, rather than having to claim costs retrospectively.

F.4.18 The concerns of the other respondents who objected to the proposed modification centred on potential abuse of the discount. It was noted that the proposed congestion charging scheme's enforcement system would be unable to distinguish whether a vehicle was being used for an 'operational' NHS journey or for personal travel. The London Borough had reservations, suggesting that the allowance for staff carrying medical records could be interpreted too widely, and that the number of journeys projected to be eligible for the discount might prove to be an underestimate. There was also concern that the discount could set a precedent for other organisations to appeal for concessions.

Proposed Modification - New Exemption for Licensed Private Hire Vehicles (Minicabs)

F.4.19 This proposed modification attracted a fairly large number of representations with 14 Stakeholders, 4 Other Organisations and 9 Individual Members of the Public mentioning it.

F.4.20 Those expressing support for the proposed modification formed a clear majority of these: 11 Stakeholders, 4 Other Organisations and 5 Individual Members of the Public.

The Stakeholders were:

- 5 London Boroughs;
- 2 Groups Representing Disabled Persons;
- 1 Motoring Organisation;
- 1 GLA Functional Body;
- 1 NHS Trust/Health Authority; and
- 1 Business Group Representative.

The Other Organisations were:

- 2 Businesses;
- 1 Voluntary/Community/Non-profit Making Organisation; and
- 1 Environment/Transport Lobby Group.

F.4.21 Most of these respondents considered that the proposed modification was logical and fair given the exemption for Black Cabs. Others thought an exemption for minicabs was appropriate given their contribution to the public transport system. It was also considered that the exemption would promote greater access to safer licensed minicabs.

F.4.22 1 Business called for the geographical eligibility to be extended on the grounds that many minicab journeys to the zone originated from outside London. The other Business was concerned that possible slippage in the timetable for licensing of minicabs could undermine the proposed modification.

F.4.23 Those expressing opposition to the proposed modification were 3 Stakeholders and 4 Individual Members of the Public.

The Stakeholders were:

- 1 MP/MEP/Member of the House of Lords;
- 1 London Borough; and
- 1 Voluntary/Community/Non-profit Making Organisation.

F.4.24 The main concerns were abuse of the exemption, by minicabs receiving an exemption while they were not on hire. There was also concern that ‘teething problems’ from the new licensing system could emerge and impact negatively on the proposed congestion charging scheme.

Proposed Modification - Extension of Eligibility for Alternative Fuel Discount

F.4.25 This proposed modification generated a fairly large number of representations with 11 Stakeholders, 7 Other Organisations and 3 Individual Members of the Public mentioning it.

F.4.26 Those expressing support for the proposed modification formed a clear majority of these: 10 Stakeholders, 6 Other Organisations and 1 Individual Member of the Public.

The Stakeholders were:

- 6 London Boroughs;
- 2 Business Group Representatives;
- 1 NHS Trust/Health Authority; and
- 1 Motoring Organisation.

The Other Organisations were:

- 5 Businesses; and
- 1 Environment/Transport Lobby Group.

F.4.27 Supporters of the proposed modification welcomed the widening of the discount as an incentive for drivers to transfer to low emission vehicles and were supportive of investments already made in clean fuel technology.

F.4.28 Those expressing opposition to the proposed modification were: 1 Stakeholder (a GLA Functional Body), 1 Other Organisation (a Business) and 2 Individual Members of the Public. Most argued that the discount was contrary to the aim of reducing congestion. This representation was also made by 6 respondents who were not discussing the proposed modification per se: 2 Stakeholders and 4 Individual Members of the Public. Another reason given for opposition to the proposed modification, by the Other Organisation was that the relaxation of the criteria for the discount would reduce the incentive for manufacturers to produce even lower emission vehicles.

F.4.29 There were calls for eligibility for the discount to be widened further notwithstanding the proposed modification (not all from respondents who discussed the modification per se). These came from 7 Stakeholders (4 Business Group Representatives, 1 Utility, 1 Freight Haulage Group and 1 Transport Partnership), 8 Other Organisations (7 Businesses and 1 Environment/Transport Lobby Group) and 1 Individual Member of the Public. These respondents considered that the discount should include clean diesel technology, and should be based purely on emission levels rather than the type of fuel used. It was considered that excluding diesel from the eligibility criteria

undermined efforts to invest in clean fuel technology. One Business also argued that the criteria for the discount should be the same for all types of vehicle, rather than being stricter for cars and light vans.

Change to Estimated Net Revenues – Annex 2 of the Scheme Order

F.4.30 TfL's revised estimate for net revenues from the proposed scheme generated a moderate number of representations with 14 Stakeholders, 2 Other Organisations and 3 Individual Members of the Public mentioning it.

The Stakeholders were:

- 8 London Boroughs;
- 1 Freight Haulage Group;
- 1 GLA Functional Body;
- 1 Business Group Representative;
- 1 MP/MEP/Member of the House of Lords;
- 1 Voluntary/Community/Non-profit Making Organisation; and
- 1 Other Local Government Association.

The Other Organisations were an Environment/Transport Lobby Group and a Residents' Association/Local Amenity Group/Society.

F.4.31 All of these respondents made critical comments to the change in net revenues, commenting for example that it was "regretted" (a London Borough). Other representations were that the reduction in estimated net revenues undermined the case for congestion charging to some extent; and concern that transport improvements to be financed by the revenue might be compromised.

F.4.32 2 Stakeholders and 2 Individual Members of the Public thought the change discredited the revenue estimate, and 8 Stakeholders and 1 Other Organisation wanted more information on why the estimate had changed.

Proposed Modification - Extended Geographical Eligibility for Blue Badge 100% Discount

F.4.33 This proposed modification generated a moderate number of representations with 14 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public mentioning it.

F.4.34 Those expressing support for the proposed modification formed a clear majority of these: 11 Stakeholders, both Other Organisations and the Individual Member of the Public.

The Stakeholders were:

- 5 Groups Representing Disabled Persons;
- 4 London Boroughs;
- 1 NHS Trust/Health Authority; and
- 1 MP/MEP/Member of the House of Lords.

The Other Organisations were an Environment/Transport Lobby Group and a Voluntary/Community/ Non-profit Making Organisation.

- F.4.35 These respondents considered that the proposed modification was logical and equitable. Respondents also mentioned that it could reduce possible negative impacts of the scheme on disabled people.
- F.4.36 Those expressing opposition to the modification were 3 Stakeholders (2 London Boroughs and an Other Local Government Association). These Stakeholders were already concerned about potential abuse of the Blue Badge scheme by non-eligible drivers using vehicles covered by a Blue Badge holders' discount. Fraudulent possession of a Blue Badge was also a concern. It was considered that the widening of the discount criteria would exacerbate this problem to the detriment of the congestion charging scheme.

Proposed Modification - Extension of PSV Exemption to Public Service Vehicles With More Than Nine Seats and New Discount for Buses Operating under Section 19 Permits and Community Buses

- F.4.37 These proposed modifications generated a moderate number of representations with 14 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public mentioning one or both of them. In many cases it was not clear whether the respondent made a distinction between the two elements of the PSV discount modification, and for that reason they are both dealt with here.

The Stakeholders were:

- 8 London Boroughs;
- 3 Groups Representing Disabled Persons;
- 1 Professional Organisation/Institution;
- 1 GLA Functional Body; and
- 1 Business Group Representative.

The Other Organisations were an Environment/Transport Lobby Group and a Voluntary/Community/ Non-profit Making Organisation.

- F.4.38 Almost all the respondents commenting on the proposed modifications expressed support: all 14 Stakeholders and both Other Organisations. Most respondents gave no specific reason for their support; but two Stakeholders mentioned that the proposed modifications would help businesses, schools or voluntary groups, and that they were consistent with the aim of reducing congestion. 1 Stakeholder expressed a concern that the wording of the Scheme Order might not in fact exempt coaches as intended. However, 1 London Borough considered that tourist coaches should not receive a discount.
- F.4.39 1 Individual Member of the Public expressed opposition to the proposed modifications on the grounds that they were arbitrary and would add to administrative costs. 1 Other Organisation and 4 Individual Members of the Public, while not mentioning the proposed modifications, said that buses cause congestion and therefore should not be exempt.

Proposed Modification - Change to Postpayment Arrangements - £5 Payable Until 8pm

F.4.40 This proposed modification generated a moderate number of representations with 11 Stakeholders, 3 Other Organisations and 11 Individual Members of the Public mentioning it.

F.4.41 9 Stakeholders expressed support for the proposed modification.

The Stakeholders were:

- 4 London Boroughs;
- 3 Business Group Representatives;
- 1 Motoring Organisation; and
- 1 Other Local Government Association.

F.4.42 They welcomed the proposed modification because it would enable greater compliance with the scheme for those that had to enter the charging zone unexpectedly. However 3 of these Stakeholders said that although the concession was welcomed, no surcharge should be charged at all for postpayment. There was concern that people might be penalised if they could not get through to the call centre to pay the charge before 8pm. 1 Stakeholder, while supporting the principle of the proposed modification, considered that the £5 postpayment period should be extended further, e.g. to midnight on the day of travel.

F.4.43 Those expressing opposition to the proposed modification were: 2 Stakeholders (a Freight Haulage Group and a Motoring Organisation) 1 Other Organisation (a Business) and 1 Individual Member of the Public. These opponents believed that it did not extend the deadline sufficiently, or that the charge for postpayment should not be increased at all. The Business in particular suggested this could cause problems for commercial operators.

F.4.44 The remainder of the respondents commenting on the proposed modification expressed confusion or appeared to have misunderstood the modification: 2 Other Organisations (an Environment/Transport Lobby Group and a Business) and 10 Individual Members of the Public. These respondents thought that the £10 charge from 8pm to midnight was for driving in the charging zone between those times, rather than being the increased charge for post payment after 8pm. For example, 1 Individual Member of the Public said "I object to the extension of the scheme to midnight at £10".

Proposed Modification - Revised Arrangements for Fleet Operators

F.4.45 This proposed modification generated a moderate number of representations with 11 Stakeholders, 3 Other Organisations and 2 Individual Members of the Public mentioning it.

The Stakeholders were:

- 4 Business Group Representatives;
- 2 Freight Haulage Groups;
- 2 London Boroughs;
- 2 Utilities; and
- 1 Motoring Organisation.

The Other Organisations were an Environment/Transport Lobby Group and 2 Businesses.

F.4.46 Most respondents on this issue welcomed TfL's work in developing special arrangements for vehicle fleet operators. However, many had reservations about its proposed form. It was generally considered that the administrative burden had not been sufficiently lifted. It was stressed that the system needed to be efficient and user-friendly. Respondents argued that the 15% surcharge for vehicles registered with the 'decrementing' fleet account system was too high, and penalised business for possible shortcomings in the congestion charging camera system. A 10% surcharge was generally considered more appropriate, subject to review as the scheme's enforcement technology improved.

F.4.47 The annual £10 registration charge combined with the 15% surcharge was considered to be excessive and to undermine the financial benefits of the fleet account system to operators. It was also considered that these charges failed to recognise the benefits to TfL of pre-payments under the fleet account system, reducing the workload of the payment call centre. Finally, there were calls to extend the 'decrementing' system to light vans and to small businesses with fleets of less than 25 vehicles, in order to reduce the administrative burden on businesses.

Proposed Modification - New Discount for Operational Travel by Firefighters

F.4.48 This proposed modification generated a moderate number of representations with 9 Stakeholders, 2 Other Organisations and 9 Individual Members of the Public mentioning it.

F.4.49 Those expressing support for the modification formed a majority of these: 7 Stakeholders, 2 Other Organisations and 2 Individual Members of the Public.

The Stakeholders were:

- 5 London Boroughs;
- 1 GLA Functional Body; and
- 1 Motoring Organisation.

The Other Organisations were a Trade Union and an Environment/Transport Lobby Group.

F.4.50 These respondents considered that the proposed discount would mitigate possible negative impacts of the congestion charging scheme on firefighting operations and staff.

F.4.51 1 Stakeholder and 1 Other Organisation called for the proposed discount to cover more staff and more types of journey, such as the journey to work, particularly for those working shifts.

F.4.52 Those expressing opposition to the proposed modification were: 2 Stakeholders (a London Borough and a Business) and 7 Individual Members of the Public. The main concern was abuse of the discount, and how it would be ensured that only charges for operational, rather than personal journeys would be discounted. Additionally, the London Borough had reservations about the discount, considering that the criteria for discount might be interpreted more broadly than intended.

F.4.53 3 Emergency Services, while not offering an opinion on the discount for firefighters, argued that such a scheme should also be extended to the police.

Proposed Modification - Extension of Eligibility for Recovery Vehicles' Discount

F.4.54 This proposed modification generated a small number of representations with 7 Stakeholders, 2 Other Organisations and 3 Individual Members of the Public mentioning it.

F.4.55 Those expressing support for the proposed modification formed a clear majority of these: 6 Stakeholders and both Other Organisations.

The Stakeholders were:

- 3 London Boroughs;
- 1 Group Representing Disabled Persons;
- 1 Motoring Organisation; and
- 1 Business Group Representative.

The Other Organisations were a Business and an Environment/Transport Lobby Group.

F.4.56 The justification for the proposed modification was considered to be the role the vehicles play in relieving congestion caused by accidents and breakdowns.

F.4.57 1 of the Other Organisations considered that eligibility should be widened further, to include independent breakdown and recovery operators.

F.4.58 Those expressing opposition to the proposed modification were: 1 Stakeholder (a GLA Functional Body), and 3 Individual Members of the Public. They believed that the charge should be absorbed as a business cost. The Stakeholder queried the rationale for extending the discount beyond Greater London.

Proposed Modification - New 'Carnet' licences

F.4.59 This proposed modification generated a small number of representations with 7 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public mentioning it.

F.4.60 Those expressing support for the proposed modification formed a clear majority of these: 6 Stakeholders, both Other Organisations and the Individual Member of the Public.

The Stakeholders were:

- 5 London Boroughs; and
- 1 Business Group Representative.

The Other Organisations were a Business and an Environment/Transport Lobby Group.

F.4.61 These respondents welcomed the increased flexibility and possible reduction of administrative costs offered by the Carnet.

F.4.62 The Stakeholder expressing opposition to the proposed modification was a London Borough. This respondent considered that as prepaid licenses would be available anyway, the Carnet would be of little value.

Proposed Modification - Removal of the Discount for Royal Mail Vehicles

F.4.63 This proposed modification generated a small number of representations with 5 Stakeholders, 5 Other Organisations and 6 Individual Members of the Public mentioning it.

F.4.64 Those expressing support for the proposed modification formed a minority of these: 1 Stakeholder (a London Borough) and 2 Other Organisations (an Environment/Transport Lobby Group and a Business). These respondents accepted the proposed modification, with the London Borough noting the recommendation of the postal services regulator; and the Business stating that the exemption, if retained, would have created a distortion in the market.

F.4.65 Those expressing opposition to the proposed modification were: 4 Stakeholders, 3 Other Organisations and 6 Individual Members of the Public.

The Stakeholders were:

- 3 London Assembly Members; and
- 1 Utility.

The Other Organisations were:

- 1 Trade Union;
- 1 Residents' Association/Local Amenity Group/Society; and
- 1 Group Representing Disabled Persons.

F.4.66 The Royal Mail's universal service obligation was a commonly expressed reason for opposition: respondents considered that as Royal Mail vehicles had a statutory duty to enter the zone, they should be entitled to special consideration. Respondents also mentioned recent job losses suffered by the company, and the point that Royal Mail already minimised their journeys in the charging zone.

Proposed Modification - Removal of the Upper Limit for Borough Operational Vehicles Receiving a 100% Discount

F.4.67 This proposed modification generated a small number of representations with 9 Stakeholders mentioning it.

The Stakeholders were:

- 7 London Boroughs; and
- 2 Business Group Representatives.

F.4.68 6 of the London Boroughs expressed support for the proposed modification on the basis that the previously proposed limit was arbitrary.

F.4.69 The 2 Business Group Representatives opposed the removal of the limit on the grounds that some Borough functions were in competition with private sector providers, and the discount for Borough operational vehicles would give them a competitive advantage. It was considered that removal of the quota would exacerbate this inequity. 3 additional Stakeholders and 2 Other Organisations also

mentioned this problem without reference to the proposed modification. The opposing London Borough argued that without an upper limit, Borough departments might be tempted to inflate the numbers of vehicles eligible for a 100% discount; and that the incentive to critically examine their vehicular requirements would be lost.

Proposed Modification - Widened Geographical Eligibility for Discounts and Exemptions (excepting the Blue Badge holders' discount discussed at paragraph F.4.33)

F.4.70 This proposed modification generated a small number of representations with 4 Stakeholders, 3 Other Organisations and 1 Individual Member of the Public mentioning it.

F.4.71 Those expressing support for the proposed modification were: 3 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public.

The Stakeholders were:

- 1 London Borough;
- 1 Business Group Representative; and
- 1 Emergency Services.

The Other Organisations were an Environment/Transport Lobby Group and a Business.

F.4.72 These respondents tended to say only that they welcomed the proposed modification, or that it met their previous objections.

F.4.73 Those expressing opposition to the proposed modification were 1 Stakeholder (a London Borough) and 1 Other Organisation (a Residents' Association/Local Amenity Group/Society).

F.4.74 The London Borough wanted clarification of the justification for the change, and suggested that discounts and exemptions should not be extended on a blanket basis but perhaps according to need. The objection from the Residents' Association/Local Amenity Group/Society was related to a call for all residents of Boroughs neighbouring the proposed charging zone to receive a discount. This organisation considered that it was unfair that exemptions and discounts would apply to eligible drivers from Europe, while their request for a discount had not been met.

Revised Timetable for Scheme Commencement

F.4.75 The proposed modification to adjust the date in the Scheme Order for the start of charging and its associated enforcement from 14 months after confirmation of the Scheme Order, to 12 months after confirmation, generated a small number of representations with 6 Stakeholders and 4 Individual Members of the Public mentioning it.

The Stakeholders were:

- 2 Groups Representing Disabled Persons;
- 1 London Borough;
- 1 Environment/Transport Lobby Group;
- 1 Business Group Representative; and
- 1 Other Local Government Association.

- F.4.76 Those expressing support for the proposed modification were all 6 Stakeholders and 1 of the Individual Members of the Public. It was considered that the extended timetable would allow more time to resolve any difficulties with the scheme.
- F.4.77 The London Borough noted that the timetable was a matter for TfL. However, the London Borough considered that if the Mayor were to confirm the Scheme Order, there could be an impact on the ability of local authorities to implement the physical works needed for the scheme, in the reduced period between confirmation and the 'go live' date.
- F.4.78 Those expressing opposition to the proposed modification were 3 Individual Members of the Public, on the basis that they wanted to see the congestion charging scheme start as soon as possible.
- F.4.79 However, 10 Stakeholders, 1 Other Organisation and 2 Individual Members of the Public (not all discussing the proposed modification per se) expressed the opinion that the proposed timetable was premature, due to the need for public transport improvements to be in place first, and the time needed for optimal design of the scheme.

Proposed Modification - Extended Residents' 90% Discount Zone to Cover Three Small Areas Adjacent to the Boundary

- F.4.80 This proposed modification generated a small number of representations with 2 Stakeholders (both London Boroughs), 1 Other Organisation (an Environment/Transport Lobby Group) and 4 Individual Members of the Public mentioning it.
- F.4.81 All these respondents with the exception of one Individual Member of the Public expressed support for the proposed modification. Among supporters, the modification was simply 'welcomed' or seen as a sensible response to an anomaly. The opposing Individual Member of the Public considered that it was unfair that concessions had been made for these areas but not for residents of Tanner Street, who were considered to be in a similar position with regard to access problems. The issues about one-way systems, mentioned at paragraph F.5.41, are also relevant to this point.

Proposed Modification - Limit of Two Vehicles Per Day to be Registered for the Blue Badge Holders' Discount

- F.4.82 This proposed modification generated a small number of representations with 4 Stakeholders and 1 Other Organisation mentioning it.
- F.4.83 The Other Organisation (a Group Representing Disabled Persons) expressed support for the proposed modification, because it would avoid restricting Blue Badge holders to one vehicle.

- F.4.84 4 Stakeholders (3 Groups Representing Disabled Persons and a London Borough) expressed opposition to the proposed modification. The London Borough argued that allowing two vehicles to be registered could increase abuse of the discount provisions.
- F.4.85 Conversely, the 3 Groups Representing Disabled Persons said the limit could cause problems for people who relied on lifts from others, and might therefore make use of several cars in a day. One of these groups argued that the limit was arbitrary; and it would effectively penalise those disabled persons who did not own a car. The other two groups said they recognised the need for a limit, but suggested that three vehicles would be preferable.

Proposed Modification - Limit of One Vehicle to be Registered for the Residents' Discount at Any One Time

- F.4.86 This proposed modification generated a small number of representations with 4 Stakeholders (all London Boroughs) and 1 Other Organisation (an Environment/Transport Lobby Group) mentioning it.
- F.4.87 Opinion was divided on the proposed modification: 2 London Boroughs and the Other Organisation expressed support for the modification on the basis that it would limit abuse or fraud, and was consistent with parking provisions.
- F.4.88 2 London Boroughs expressed opposition to the proposed modification, arguing that it was unduly restrictive. One of these London Boroughs commented that the restriction was inconsistent with residents' parking allowances, as residents were permitted to register two cars and keep one of them on-street in the Borough – to remove this choice was considered to be unfair.

Proposed Modification - Safeguards Against Fraudulent Payments

- F.4.89 This proposed modification generated a small number of representations with 3 Stakeholders (all London Boroughs) and 1 Other Organisation (an Environment/Transport Lobby Group) mentioning it.
- F.4.90 All these respondents expressed support for the proposed modification, without elaboration.

Extension of Emergency Services' Discount to Coastguard and Port of London Authority Vehicles

- F.4.91 This proposed modification generated a small number of representations with 3 Stakeholders (an Emergency Service, a London Borough and a Freight Haulage Group) mentioning it.
- F.4.92 All these respondents expressed support for the modification; although one was concerned that the definition of eligible vehicles in the Scheme Order might exclude certain essential maintenance vehicles.

Proposed Modification - New 100% Discount for Royal Parks Agency Vehicles

- F.4.93 This proposed modification generated a small number of representations with 3 Stakeholders (all London Boroughs) mentioning it.
- F.4.94 All these respondents expressed support for the proposed modification, without elaboration.

Proposed Modification - Extension of Disabled Discount to Institutional Blue Badge Holders

F.4.95 This proposed modification generated a small number of representations with 2 Stakeholders (both London Boroughs) mentioning it. Both these respondents welcomed the modification.

Other Proposed Modifications Receiving Few or No Representations

F.4.96 Modifications that received little or no attention from respondents are listed below. Representations mentioning these aspects came primarily from the few respondents that submitted very comprehensive representations on the proposed modifications. In some cases they were only noted by respondents without elaboration or further comment.

The Mount Street charging zone boundary alteration

F.4.97 1 Other Organisation (an Environment/Transport Lobby Group) and 1 Individual Member of the Public expressed support for this proposed modification. 1 Stakeholder (a London Borough) noted the modification but made no comment.

Restriction of residents' discount to those aged 17 or over

F.4.98 1 Stakeholder (a London Borough) and 1 Other Organisation (an Environment/Transport Lobby Group) expressed support for this proposed modification.

Controls on fraudulent applications

F.4.99 1 Stakeholder (a London Borough) and 1 Other Organisation (an Environment/Transport Lobby Group) expressed support for this proposed modification.

Removal of requirement to provide proof of a change of address when applying for a refund

F.4.100 1 Stakeholder (a London Borough) mentioned this; although they did not expressly oppose the proposed modification they warned that safeguards against abuse needed to remain robust and should be balanced carefully against measures to reduce administrative costs.

Changes to arrangements for advance payment of the congestion charge

F.4.101 1 Stakeholder and 1 Other Organisation expressed support for this proposed modification.

Changes to the registration process for discounts

F.4.102 1 Stakeholder and 1 Other Organisation expressed support for this proposed modification.

Change to the registration period for discounts

F.4.103 1 Stakeholder and 1 Other Organisation expressed support for this proposed modification.

Facility for amendment to licences

F.4.104 1 Stakeholder expressed support for this proposed modification.

Changes to maintenance arrangements for the discounts register (vehicles to be removed from the discount register if eligibility ceases, or after a change of keeper)

F.4.105 1 Other Organisation expressed support for this proposed modification.

MOD vehicles to be 100% discounted rather than exempt

- F.4.106 No representations on this proposed modification were identified. However, 1 Stakeholder proposed that the wording of the Scheme Order, defining those Ministry of Defence vehicles to be eligible for a discount, should be altered to reflect a broader operational scope. Subsequently a representation was received from the Ministry of Defence and a meeting was held to discuss the representation.

The change to the registration process for the Blue Badge holders' discount

- F.4.107 No representations on this modification were identified.

New exemption for VED exempt lifeboats

- F.4.108 No representations on this modification were identified.

F.5 Representations Concerning Unmodified Aspects of the Proposed Congestion Charging Scheme

- F.5.1 Representations relating to the unmodified aspects of the congestion charging scheme were broadly consistent with the findings of the first round of consultation. As before, key issues that exercised respondents included public transport improvements, traffic impacts at the proposed charging zone boundary, equity and civil liberties issues, effects on quality of life and effects on businesses. A new response was from those disappointed that their representations at the first round had not been adopted by the proposed modifications: this is considered at paragraph F.5.20.
- F.5.2 There were a number of queries and misconceptions relating to the proposed scheme. In aggregate, the representations of 2 Stakeholders, 4 Other Organisations and 43 Individual Members of the Public contained identifiable misconceptions or queries relating to the working of the scheme. For example, some respondents asked whether their circumstances would make them eligible for a discount; and some made representations that suggested a misunderstanding of how and when a licence could be purchased. A few respondents queried whether the congestion charge would be suspended in the event of strikes on public transport; and whether the congestion charge would be tax-deductible. Some thought that ‘VIPs’ such as the Mayor, MPs or TfL senior staff, would be exempt. The biggest single area of misunderstanding surrounds the ability to pay the charge after the end of the charge period (discussed above at paragraph F.4.44).
- F.5.3 As far as is possible, the issues are reported in order of importance across the respondent types in terms of the number of respondents raising them. However, given the different priorities of the three respondent types, this cannot be done precisely. Specific representations additional to those identified below, made by 4 Individual Members of the Public or fewer, are listed in Appendix B to this Annex.

Public Transport Improvements

- F.5.4 As with the July 2001 consultation on the made Scheme Order, issues around public transport were of high significance to respondents. Concerns centred on reasons why public transport was not viewed as an adequate ‘substitute’ for driving.
- F.5.5 The following respondents made one or more representations regarding public transport:
- 22 Stakeholders;
 - 23 Other Organisations; and
 - 131 Individual Members of the Public.

- F.5.6 The main representation was the need to improve public transport *before* introducing the proposed congestion charging scheme:
- 16 Stakeholders;
 - 15 Other Organisations; and
 - 51 Individual Members of the Public.
- F.5.7 This was related to a belief that public transport improvements would not be in place before the scheme 'goes live'. This view was expressed by:
- 4 Stakeholders;
 - 1 Other Organisation; and
 - 30 Individual Members of the Public.
- F.5.8 Another concern was that the planned public transport improvements would be insufficient to meet the needs of passengers. This point was mentioned by:
- 2 Stakeholders;
 - 3 Other Organisations; and
 - 12 Individual Members of the Public.
- F.5.9 20 Individual Members of the Public considered that the public transport system could not cope with more passengers.
- F.5.10 1 Stakeholder said that while improvements to the bus network were welcome, longer term development to other parts of the transport system were necessary. Targets for public transport improvements were also mentioned.
- F.5.11 The main concerns expressed about current public transport provision were that:
- It was not viable for certain journeys (e.g. when carrying heavy loads) (3 Other Organisations and 24 Individual Members of the Public);
 - It was not viable for all destinations due to a lack of routes (2 Other Organisations and 16 Individual Members of the Public);
 - It was unpleasant (e.g. overcrowded, dirty or uncomfortable) (12 Individual Members of the Public);
 - It needed to be more reliable (1 Stakeholder, 1 Other Organisation and 11 Individual Members of the Public);
 - It needed to be more safe for passengers (2 Stakeholders, 1 Other Organisation and 13 Individual Members of the Public); and
 - It needed to be less expensive (1 Other Organisation and 11 Individual Members of the Public).
- F.5.12 Lack of accessibility for disabled and mobility impaired people was mentioned by 4 Stakeholders and 3 Individual Members of the Public. Suggestions to improve accessibility included replacing Routemaster buses with low floor buses, producing Countdown information in a more accessible format (including audible information), creating more Blue Badge parking spaces in central London, street access improvements (such as dropped kerbs, removing clutter and widening

pavements), and better door-to-door services with more integration into the public transport network.

F.5.13 Specific representations relating to National Rail and the Underground were made by 4 Stakeholders, 3 Other Organisations and 24 Individual Members of the Public. Chief amongst these were:

- That the Underground was overcrowded (2 Other Organisations and 14 Individual Members of the Public); and
- That additional rail infrastructure was needed (2 Stakeholders, 1 Other Organisation and 2 Individual Members of the Public)

F.5.14 While 1 Stakeholder commented on the potential for additional buses to free up capacity on the Underground, more respondents were concerned that congestion charging could make overcrowding worse (1 Stakeholder and 5 Individual Members of the Public).

F.5.15 Specific representations relating to bus services were made by 4 Stakeholders, 2 Other Organisations and 29 Individual Members of the Public. Chief amongst these were:

- The unsuitability of buses for some journeys due to unreliability and slow journey times (15 Individual Members of the Public);
- The need for better access for people with restricted mobility (3 Stakeholders and 3 Individual Members of the Public);
- The need for more bus lanes (7 Individual Members of the Public);
- The need for more night/off-peak bus services (1 Other Organisation and 1 Individual Member of the Public); and
- The need for school buses (1 Stakeholder, 1 Other Organisation and 2 Individual Members of the Public).

Effects on businesses

F.5.16 The potential adverse effects of the congestion charging scheme on businesses in London were a significant concern, mentioned by 33 Stakeholders, 25 Other Organisations and 39 Individual Members of the Public.

F.5.17 1 Stakeholder and 2 Other Organisations argued that the benefits to business claimed for the congestion charging scheme had been overstated.

F.5.18 Specific concerns about negative impacts on business are described below.

- Increased costs, which would be passed on to consumers/proprietors. 5 of the Stakeholders mentioning this issue were NHS Trusts/Health Authorities, and 1 was an Emergency Service. These respondents noted that increased costs incurred by their suppliers could impact on the costs of supplying health and emergency services. (20 Stakeholders, 14 Other Organisations and 9 Individual Members of the Public);
- Staff recruitment and retention difficulties due to increased costs of working in the congestion charging zone. 7 of the Stakeholders mentioning this issue were NHS Trusts, concerned that

recruitment and retention of health service staff could be particularly affected by the congestion charge.

(11 Stakeholders, 2 Other Organisations and 7 Individual Members of the Public);

- Fears of loss of business, including concerns about the theatres and evening economy, and tourism

(4 Stakeholders, 4 Other Organisations and 15 Individual Members of the Public);

- Disproportionate effects on small businesses, with tight profit margins and little scope to absorb the congestion charge

(6 Stakeholders, 4 Other Organisations and 9 Individual Members of the Public); and

- Concerns that businesses might have to relocate

(3 Stakeholders, 4 Other Organisations and 6 Individual Members of the Public).

F.5.19 There was a related call for commercial vehicles to be exempt from the congestion charge (discussed at paragraph F.5.79).

The Consultation Process/Public Inquiry

F.5.20 There were a variety of concerns about the December 2001 consultation process from a number of respondents: 24 Stakeholders, 18 Other Organisations and 50 Individual Members of the Public. Chief amongst these were that representations to the first round of consultation had either not been answered, or concerns had not been resolved to the satisfaction of respondents (11 Stakeholders, 7 Other Organisations and 27 Individual Members of the Public).

F.5.21 7 Stakeholders, 2 Other Organisations and 6 Individual Members of the Public considered that consultation should have been carried out more widely or that awareness of the congestion charging scheme was low. 5 of these Stakeholders named some specific organisations that they thought should have been contacted – a wider range of staff in the NHS, local transport forums, mobility forums, retailers, and the water regulator. Another Stakeholder considered that consultation had been ‘low key’, which was echoed by 6 Individual Members of the Public saying that Londoners were generally unaware of the scheme or that a household leaflet drop should have been carried out. 1 Stakeholder and 2 Other Organisations considered that there should have been more consultation of residents outside the congestion charging zone. 1 Other Organisation stated that there should be more consultation and research before implementation.

F.5.22 Most of the related representations referred to insufficient provision of information. In particular, 2 Stakeholders, 1 Other Organisation and 1 Individual Member of the Public wanted more information on the projected impacts of the congestion charging scheme; and 1 Stakeholder wanted more information on traffic management plans. It was also commented that the consultation information was not thought to have been provided in accessible formats.

F.5.23 4 Stakeholders and 3 Individual Members of the Public considered that the time period for consultation was inadequate, particularly as it fell during the Christmas holiday period.

F.5.24 Some respondents called for a public inquiry (7 Stakeholders, 8 Other Organisations and 15 Individual Members of the Public). The main justification for this request was that concerns raised during consultation had not been satisfactorily resolved. Other reasons for calling for a public inquiry were to instigate an independent, comprehensive study of the scheme’s implications, and to have a public debate on the issue. 1 London Borough considered that the case for a public inquiry

had been strengthened by the reduction in estimated net revenues: they considered that an inquiry would provide an opportunity to ensure that projected improvements to public transport would be funded despite this change. 1 Other Organisation and 3 Individual Members of the Public said the decision on whether to implement congestion charging should be subject to a public vote.

Equity and Civil Liberties Issues

F.5.25 4 Stakeholders, 9 Other Organisations and 73 Individual Members of the Public considered that the proposed scheme was inequitable in some sense, due to for example:

- The charge having a greater effect on low income groups than on the wealthy (2 Stakeholders, 4 Other Organisations and 25 Individual Members of the Public);
- The already high cost of living in London (1 Other Organisation and 25 Individual Members of the Public);
- The fact that people already pay road tax and fuel tax (1 Other Organisation and 14 Individual Members of the Public); and
- The fact that residents already have to pay for their parking (1 Other Organisation and 7 Individual Members of the Public).

F.5.26 The charge was described as ‘just another tax’ by 4 Stakeholders, 7 Other Organisations and 39 Individual Members of the Public. Some saw it as an infringement of civil liberties or human rights to charge for travelling to central London: 2 Stakeholders, 3 Other Organisations and 13 Individual Members of the Public.

F.5.27 Congestion charging was thought unnecessary by 1 Stakeholder, 2 Other Organisations and 15 Individual Members of the Public. Respondents considered that the traffic conditions in the proposed congestion charging zone did not warrant such measures. The Stakeholder argued that factors such as roadworks or bus lanes are the cause of congestion. 8 Individual Members of the Public considered that the proposed congestion charging scheme was a waste of public money.

Mayoral Strategies

F.5.28 Some doubted the conformity of the scheme with the Mayor’s other strategies for London: 4 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public. In particular, the lack of a discount for commercial vehicles was said to be at odds with supporting the function of commercial traffic as outlined in section 4k of the Transport Strategy; and the recognition given to all types of low emission fuel in the Draft Air Quality Strategy was cited as a reason to extend the discount for alternative fuel vehicles further. 1 Stakeholder and 2 Individual Members of the Public thought that there was a political motivation for the congestion charging proposals.

Impacts on ‘Boundary Residents’

F.5.29 A major concern across all respondent types was the possible adverse impact of the congestion charging scheme on traffic at the charging zone boundary and on nearby routes – principally increased traffic along the Inner Ring Road as traffic diverts around the congestion charging zone. It was thought by some that traffic would be displaced rather than removed by the congestion charging scheme. 10 Stakeholders, 18 Other Organisations and 73 Individual Members of the Public mentioned concerns about ‘boundary traffic’.

- F.5.30 Related to possible increased 'boundary traffic' were concerns about increased pressure on parking, outside but close to the congestion charging zone, as people sought to 'park and ride': 4 Stakeholders, 4 Other Organisations and 11 Individual Members of the Public. Increasing the provision of Controlled Parking Zones in these areas was the main suggestion to protect residents' parking spaces. 1 Other Organisation was concerned about congestion on the roads running through Hyde Park as a result of diverted traffic.
- F.5.31 Many respondents were concerned about the possible adverse effects of the charge on the communities at the congestion charging zone boundary – essentially that communities straddling the Inner Ring Road would be severed by the boundary: 5 Stakeholders, 7 Other Organisations and 39 Individual Members of the Public. These respondents also feared other negative impacts on residents outside but near the congestion charging zone, caused mainly by an increase in traffic. There was concern that diverted traffic, particularly on residential streets, would lead to pollution and safety problems. 5 Individual Members of the Public were concerned about their health in case of increased congestion and pollution on the boundary.
- F.5.32 These residents were also considered to be at a disadvantage because many of their local services and amenities were located inside the charging zone, and so they would be restricted by having to pay the charge in order to drive to these facilities during charging hours. It was perceived that 'boundary residents' would not share in any of the benefits of the congestion charging scheme, but would suffer many problems as a consequence of it.
- F.5.33 A few respondents were concerned that boundary residents would suffer a fall in property prices, due to the negative effects mentioned above: 1 Stakeholder, 3 Other Organisations and 6 Individual Members of the Public. This was sometimes contrasted with the possible increase in house prices within the congestion charging zone, and the differential effects on neighbours on either side of the charging zone boundary were seen as inequitable.
- F.5.34 The possible problems described in this section were sometimes cited in connection with a call for residents outside, but close to the congestion charging zone boundary to receive the residents' 90% discount. This is discussed further at paragraph F.5.69.

The Charging Zone Boundary

- F.5.35 There were many representations relating to the position of the charging zone boundary, with 14 Stakeholders, 16 Other Organisations and 66 Individual Members of the Public making some reference to altering the boundary. The main changes proposed are considered below.

Kennington Lane

- F.5.36 2 Stakeholders, 7 Other Organisations and 24 Individual Members of the Public argued that Kennington Lane is not an appropriate road to form part of the congestion charging zone boundary.
- F.5.37 These respondents usually mentioned the unsuitability of the road, due to its single-carriageway status; fearing that any increase in boundary traffic would cause severe congestion, worsen noise levels and air quality. The issue of community severance described at paragraph F.5.31 was also cited as a particular problem for the Kennington area.
- F.5.38 2 of the Other Organisations (a Residents' Association/Local Amenity Group/Society and a Voluntary/Community/Non-profit Making Organisation) contributed petitions, with 260 and 39

signatures respectively, objecting to the boundary at Kennington Lane. These petitions are summarised in Appendix A to this Annex.

F.5.39 1 of the Stakeholders, 3 of the Other Organisations and 8 of the Individual Members of the Public concerned about Kennington Lane proposed that Harleyford Road/Kennington Park Road should be used as an alternative to Kennington Lane.

Other issues concerning particular parts of the boundary

F.5.40 Some other specific representations about the congestion charging zone boundary were made:

- The call for a local boundary adjustment at the Edgware Road (1 Stakeholder, 2 Other Organisations and 1 Individual Member of the Public);
- Concerns about Tower Bridge, especially its ability to handle any extra traffic (3 Stakeholders, 1 Other Organisation and 2 Individual Members of the Public);
- The call to include more of the roads around Marylebone within the congestion charging zone (1 Stakeholder, 1 Other Organisation and 1 Individual Member of the Public);
- The call to exclude the St. Chad Street area from the congestion charging zone (1 Stakeholder and 1 Other Organisation);
- The call to include York Terrace within the congestion charging zone (1 Stakeholder); and
- The call to include Harleyford Road within the congestion charging zone (1 Other Organisation and 1 Individual Member of the Public).

F.5.41 Other representations applied to a number of locations:

- Problem areas where one-way systems were said to make it impossible to reach a destination outside the charging zone without entering the zone. Respondents mentioning this problem considered that either they should be included in the residents' discount zone, or that the boundary should be adjusted (1 Stakeholder and 6 Individual Members of the Public);
- The effect on shops on the boundary whose delivery access involved entering the charging zone (2 Stakeholders and 1 Other Organisation); and
- Changes to traffic management and parking or loading arrangements on the Inner Ring Road in the future could mean that further alterations to the boundary or the residents' 90% discount zone become necessary. (1 Stakeholder).

F.5.42 Some respondents suggested proposals to change the size of the congestion charging zone:

- Extending the zone - to the North/South circular or to the M25; or to incorporate the whole of a Borough currently split by the boundary (4 Stakeholders, 2 Other Organisations and 20 Individual Members of the Public);
- Reducing the size of the zone (2 Other Organisations and 9 Individual Members of the Public); and
- Excluding the south of the Thames from the congestion charging zone (1 Stakeholder, 2 Other Organisations and 8 Individual Members of the Public).

- F.5.43 5 Individual Members of the Public argued that the congestion charging zone covered the wrong area, as there was more congestion on roads outside the proposed charging zone.

Traffic Management

- F.5.44 A number of respondents mentioned traffic management issues: 14 Stakeholders, 6 Other Organisations and 7 Individual Members of the Public.
- F.5.45 References to the London lorry ban were made by 5 Stakeholders and 1 Other Organisation. These respondents were keen to see the ban reviewed in order to increase the scope for deliveries outside of congestion charging hours.
- F.5.46 The need for further reallocation of roadspace was raised by 3 Stakeholders, 2 Other Organisations and 2 Individual Members of the Public. 1 Stakeholder and 1 Individual Member of the Public wanted to see more bus priority. 2 of the Stakeholders (Groups Representing Disabled Persons) recommended that freed-up road space should be used to increase segregation of cycle paths, as shared use facilities with pedestrians can be dangerous for those with visual impairment.
- F.5.47 There were calls by 1 Stakeholder, 2 Other Organisations and 1 Individual Member of the Public for more controlled parking zones at the boundary to avoid 'park and ride' by commuters taking up residents' parking spaces.
- F.5.48 Other respondents focussed on the need to deal effectively with diverted traffic on and near to the charging zone boundary. However, some respondents mentioned specific traffic management measures in their area - not always directly related to congestion charging - and raised particular complaints. Others made specific suggestions for traffic management in particular locations, such as improving traffic signal timings or implementing traffic calming.

Distribution of Net Revenues

- F.5.49 12 Stakeholders, 4 Other Organisations and 14 Individual Members of the Public addressed the issue of net revenues and how they would be distributed. A number of diverse representations were made with the chief one being in support of spending on public transport (4 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public). Some respondents commented that some of the revenues should be deployed to the benefit of the business community, particularly through better access and facilities for deliveries and servicing. 1 Stakeholder recommended that car-share clubs should receive a share of the revenues, to encourage this method of reducing congestion. 4 Stakeholders recommended that funds should be directed to improve accessibility for disabled people.
- F.5.50 A concern was raised by 1 Stakeholder and 5 Individual Members of the Public that too much of the revenue would be consumed by operating costs, or that the revenues would be less than forecast. There was also concern that the revenues would be too low to effect the desired level of public transport improvements (1 Other Organisation and 4 Individual Members of the Public).
- F.5.51 1 Stakeholder and 2 Individual Members of the Public asked for more details on the spending plans for the net revenues. A number of Stakeholders stressed that the net revenues from the scheme must be additional to government funding. 1 Other Organisation said that revenues should be

dedicated to capital projects. There were calls for extension of the hypothecation period by 5 Stakeholders and 1 Individual Member of the Public.

Effects on the Quality of Life and Cost of Living

- F.5.52 Representations were made about potential negative effects of the scheme on the quality of life for Londoners, by 3 Stakeholders, 13 Other Organisations and 43 Individual Members of the Public. Some of these respondents referred to ways in which the congestion charge could curtail everyday activities – e.g., ‘Now I will have to pay to visit my family’ (Individual Member of the Public). This was closely related to the equity issue discussed at paragraph F.5.25. However a small number of Stakeholders and Individual Members of the Public thought quality of life would improve.
- F.5.53 There were also concerns about the effect of the scheme on the cost of living in London: 1 Stakeholder, 5 Other Organisations and 24 Individual Members of the Public. Representations included a concern that the charge might force people to live or work outside of London; that prices would rise and that London would become too expensive a place to live.

Effects on the Environment

- F.5.54 Environmental issues were raised by 7 Stakeholders, 7 Other Organisations and 39 Individual Members of the Public. Most of these respondents considered that there would be increased pollution at the boundary due to diverted traffic. Noise was singled out by 5 Other Organisations and 10 Individual Members of the Public. Some respondents called for an environmental impact assessment, particularly at Kennington Lane and the rest of the Inner Ring Road. 6 Individual Members of the Public argued that increased journey times as drivers diverted around the congestion charging zone would create more pollution.

The Impact of the Scheme on Traffic Levels

- F.5.55 A number of respondents considered that the scheme would not have the desired effect on traffic congestion, or did not trust the results of traffic modelling. 4 Stakeholders, 6 Other Organisations and 54 Individual Members of the Public mentioned these concerns.
- F.5.56 Some of these respondents argued that the charge would not work because congestion is caused by factors such as roadworks, poor traffic management, buses, or white vans. A few commented that people would get used to paying the charge and would therefore drive regardless of the congestion charging scheme.

Enforcement

- F.5.57 Concerns about enforcement of the scheme were expressed by 10 Stakeholders, 4 Other Organisations and 7 Individual Members of the Public. The most significant concern, expressed by 6 Stakeholders and 1 Other Organisation, was about enforcing eligibility criteria for discounts and exemptions: the need to ensure validity of applications, and the need to ensure that vehicles on the discount register are not being used by non-eligible drivers. This has been discussed already in relation to the discounts for the NHS, firefighters, minicabs and Blue Badge holders. 1 Stakeholder also foresaw difficulties in enforcing the discount for Borough operational vehicles, as some of those vehicles could be used on a commercial basis for part of the day. 1 Stakeholder, 1 Other

Organisation and 3 Individual Members of the Public queried how the charge would be enforced for foreign registered vehicles.

- F.5.58 3 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public queried how an appeals procedure for disputing penalty charge notices would work. 2 Stakeholders and 1 Other Organisation were concerned about procedures for clamping and/or removing vehicles. A London Borough commented that this could cause problems in boroughs where clamping was not otherwise used; and a Business was concerned that rental vehicles might be clamped because of penalty charge notices incurred by previous renters. 1 Other Organisation was concerned that enforcement measures might be too oppressive.
- F.5.59 One Stakeholder suggested that congestion charging enforcement activities could exacerbate problems for local authorities tracing owners of abandoned vehicles. Another concern was that enforcement activities could result in key emergency utility vehicles being disabled. Finally, 1 Stakeholder said that enforcement of congestion charging would require more traffic wardens on the street.

Days and Hours of Operation

- F.5.60 Excluding representations on the proposed modification to the hours of operation, there were a significant number of representations concerning this subject: by 6 Stakeholders, 7 Other Organisations and 24 Individual Members of the Public.
- F.5.61 4 Stakeholders, 1 Other Organisation and 11 Individual Members of the Public considered that the charging hours should be extended, mainly to finish later in the evening. One of the Stakeholders considered that the charging hours should be reviewed in the future if traffic conditions warranted some extension of the charging period.
- F.5.62 2 Stakeholders, 6 Other Organisations and 9 Individual Members of the Public wanted the charging hours to be reduced. 1 Other Organisation and 1 Individual Member of the Public argued that charging should finish earlier, as evening traffic into London was against the main traffic flow. 1 Other Organisation and 3 Individual Members of the Public considered that the congestion charge should operate during peak hours only.
- F.5.63 Other representations on the hours of operation were that they were inconsistent with parking controls (2 Stakeholders), and the concern that 'peak-shifting' would occur, with more traffic appearing outside the charging hours (6 Individual Members of the Public).

Discounts and Exemptions

- F.5.64 A small number of respondents made representations about the overall discounts and exemptions package proposed by TfL. 1 Stakeholder and 2 Individual Members of the Public indicated that they were supportive of the proposed discounts and exemptions. However, 1 Stakeholder and 1 Other Organisation objected to a 'public sector bias' in the proposals. 2 Stakeholders and 4 Individual Members of the Public considered that discounts and exemptions should be kept to a minimum, to preserve the decongestion benefits of the proposed congestion charging scheme.
- F.5.65 Notwithstanding the proposed modifications, there remained a number of proposals for further discounts and exemptions, and representations on the details of existing concessions. These are presented below, organised by subject area.

F.5.66 When interpreting the figures for respondents that were coded as calling for new discounts or exemptions, it is important to note that other respondents may have expressed serious concerns about the impacts of the congestion charge on certain groups, without expressly saying they should receive a discount (these representations are detailed in other sections). Such representations could be interpreted as having been intended as arguments for new discount categories. However, in practice this is not always obvious. Another interpretation of some statements could be that the respondent recognised that the possible impact of the scheme on a group could not necessarily be resolved through creating a new discount (given the operational difficulties involved in defining and enforcing some proposals for new discounts); but saw this as a fundamental flaw in the scheme.

Residents' 90% Discount

Comments on TfL's existing proposals

F.5.67 2 Stakeholders and 10 Individual Members of the Public said that residents should receive a 100% discount or exemption from the charge, rather than the 90% proposed. 1 Other Organisation and 2 Individual Members of the Public argued for the 90% discount to apply to daily licences rather than a minimum of a weekly licence. 1 Stakeholder commented on the £10 annual charge for the residents' discount, concerned that it would be disproportionately expensive for residents who very occasionally used a car.

F.5.68 However, 5 Individual Members of the Public opposed the residents' discount, on the basis that the residents of the central zone had good public transport provision, or that they contributed to congestion.

Proposals to extend eligibility for the discount

F.5.69 Some respondents argued for the eligibility criteria for the residents' discount to be extended. One significant proposal was for a discount to be afforded to residents outside but near the congestion charging zone, and particularly those on the boundary – creating a 'buffer zone' (7 Stakeholders, 3 Other Organisations and 23 Individual Members of the Public). This argument was commonly supported with reference to the possible negative effects discussed at paragraph F.5.29: it was considered that a discount would mitigate these impacts or act as a form of compensation.

F.5.70 Another proposal was for all residents of the Boroughs that are partly within the congestion charging zone to receive a 90% discount (3 Other Organisations); or all residents of Kensington & Chelsea (1 Stakeholder and 1 Individual Member of the Public). 2 Other Organisations wanted to see all London resident council tax payers receive a discount. 8 Individual Members of the Public said that their street or their residents' parking zone was split by the proposed boundary, and so it was unfair that they would be excluded from the residents' discount. Other suggestions for extended eligibility, put forward by 1 Stakeholder each, were occasional residents, and rental cars based in the charging zone.

100% Discount for Blue Badge Holders

Comments on TfL's existing proposals

- F.5.71 Calls for the annual charge of £10 to be waived came from 3 Stakeholders, 1 Other Organisation and 2 Individual Members of the Public. It was argued that to charge people who have no alternative to driving was discriminatory and could increase social exclusion. It was commented that the annual charge would impact disproportionately on occasional visitors to London, such as those attending an annual hospital appointment.
- F.5.72 Concerns were expressed about potential abuse of the Blue Badge scheme, by 6 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public. Respondents were concerned that eligibility criteria for the Blue Badge scheme were not always applied stringently enough, and that Blue Badges could sometimes be procured illegally. There was also concern about non-eligible drivers using vehicles covered by a Blue Badge holders' discount.

Proposals to extend eligibility for the discount

- F.5.73 There were calls for wider eligibility for discounts for disabled people, by 5 Stakeholders and 3 Individual Members of the Public – such as extending eligibility to people registered as partially sighted, profoundly deaf people and those with learning disabilities; or by using alternative criteria for the discount such as Dial-a-Ride or Taxicard membership. 1 Stakeholder and 3 Individual Members of the Public said that all people who find public transport inaccessible, particularly those working in the charging zone, should receive a discount. One point made against using the Blue Badge scheme as a basis for the discount was that people without access to a car may not have a Blue Badge; and furthermore some people may not realise they are eligible for a Blue Badge.

Comments on TfL's existing proposals

Exemption for Black Cabs

- F.5.74 1 Stakeholder noted that as Black Cabs are licensed annually, consideration would need to be given to periods when the vehicles were on the road, but unlicensed, during training or testing.

Exemption for Motorcycles and Mopeds

- F.5.75 There was some opposition, from 1 Stakeholder, 1 Other Organisation and 6 Individual Members of the Public, to the exemption for powered two-wheelers on the grounds that they were unsafe, noisy or polluting, and some considered that they contributed to congestion. But set against this was approval from 2 Other Organisations for the exemption on the grounds that it would help reduce car numbers.

Suggestions for new discounts and exemptions

Suggested New Discount for Shift Workers

- F.5.76 11 Stakeholders, 2 Other Organisations and 23 Individual Members of the Public called for a discount for shift workers. Their main arguments concerned problems with personal safety on public transport at night (4 Stakeholders and 11 Individual Members of the Public) and the lack of

public transport services at night (4 Stakeholders, 1 Other Organisation and 11 Individual Members of the Public). 1 Stakeholder and 1 Individual Member of the Public also noted that proposed improvements to night-time services on London's public transport would not help those travelling into central London from outside Greater London.

- F.5.77 Calls for workers in the zone generally to receive a discount were made by 1 Other Organisation and 2 Individual Members of the Public. A discount for market workers was proposed by 3 Stakeholders. 2 Stakeholders argued that postal workers should receive a discount.

Suggested New Discount for Carers and Charity Workers

- F.5.78 There were calls for a discount for carers or charity workers by 12 Stakeholders, 6 Other Organisations and 2 Individual Members of the Public. 1 Stakeholder and 1 Other Organisation particularly mentioned volunteer drivers for patient transport services; and 3 Stakeholders, 2 Other Organisations and 2 Individual Members of the Public mentioned visits to the elderly or disabled. It was considered that without a discount, the charge could impact negatively on the provision of caring and voluntary services, and that the organisations involved would find it difficult to cover the cost of the congestion charge.

Suggested New Discount for Commercial Vehicles

- F.5.79 10 Stakeholders, 9 Other Organisations and 2 Individual Members of the Public considered that commercial and delivery vehicles should be offered a discount, as they have no choice but to enter the charging zone, and public transport does not offer a feasible alternative for their operations. It was also noted that restrictions on delivery vehicles operating in central London meant that journeys could not be rescheduled to take place outside the charging hours.
- F.5.80 It was considered that journeys by commercial vehicles would continue irrespective of the congestion charge, so congestion would not reduce as a result of charging commercial vehicles. Some respondents thus considered that the charge amounted to another 'tax' on business.
- F.5.81 5 Stakeholders and 2 Other Organisations argued that to provide a discount for Borough operational vehicles but not for commercial vehicles was unfair, as some Borough functions were in competition with the private sector (this is also discussed at paragraph F.4.69). These respondents considered that either the discount for Borough operational vehicles should be withdrawn, or a discount should be extended to commercial vehicles.
- F.5.82 As discussed above at paragraph F.5.28, some respondents considered that the lack of a discount for commercial vehicles was inconsistent with the Transport Strategy's view of the role of commercial traffic in London.

Suggested New Discount for Hospital Patients and their Visitors

- F.5.83 Some respondents, notably Stakeholders, wanted exemption for hospital patients and their visitors (7 Stakeholders, 1 Other Organisation and 3 Individual Members of the Public). There was concern that patients might miss appointments because of the cost of the congestion charge, and that fewer would self-present at hospital, putting a strain on NHS patient transport services.

Suggested New Discount for Utilities Vehicles

F.5.84 3 Stakeholders and 3 Other Organisations wanted utilities vehicles to receive a discount or exemption, since they are carrying out statutory obligations. Vehicles maintaining essential services and those on emergency call-out were particular concerns.

Suggested New Discount for 'Key Workers'

- F.5.85 There were calls from 7 Stakeholders, 3 Other Organisations and 9 Individual Members of the Public, for discounts to apply to 'key workers'. Emergency services personnel were most often identified as 'key workers' by these respondents, although teachers were also singled out.
- F.5.86 3 of the Stakeholders discussed specific concessions for the police. 1 considered that police officers authorised to use their own cars for operational purposes should receive a discount; the other 2 thought that a discount should also apply to police officers travelling to work, particularly those called to duty at short notice to attend incidents, and to police dog handlers. These respondents referred to the new discounts for operational journeys by NHS staff and firefighters as a precedent for extending similar schemes to the police.
- F.5.87 Reasons given for supporting discounts for 'key workers' tended to centre on a lack of public transport services for their journey to work, particularly for those working shifts or living outside of Greater London. It was also considered that the public services delivered by these workers justified the provision of a discount.
- F.5.88 The representations discussed at paragraphs F.4.15 and F.4.51, to extend the NHS and firefighters' discount schemes to the journey to work, are also relevant to this issue.

Other Suggested New Discounts and Exemptions

- F.5.89 There were a number of other suggestions for new discounts or exemptions made by small numbers of respondents, some of which are detailed in Appendix B. The main one of these was for low income workers (3 Stakeholders, 1 Other Organisation and 2 Individual Members of the Public), in particular for public sector workers on low incomes. Other requests included discounts for elderly people (1 Other Organisation and 1 Individual Members of the Public) and for car-share clubs (2 Stakeholders and 4 Individual Members of the Public). 1 Other Organisation proposed that all VED-exempt vehicles should be exempt from the congestion charge.

Suggested Alternatives to the Congestion Charging Scheme

- F.5.90 The majority of suggestions for alternatives to the proposed scheme came from 51 Individual Members of the Public, but 2 Stakeholders and 5 Other Organisations also contributed. These were many and diverse, but the main suggestions were:
- Improve public transport instead (as distinct from public transport improvements to complement congestion charging). Representations included improving management, more investment, and education of the public about alternative transport modes (1 Stakeholder, 2 Other Organisations and 16 Individual Members of the Public);
 - Restrict the access of delivery vehicles to central London (1 Other Organisation and 7 Individual Members of the Public);
 - Improve enforcement of parking restrictions and other existing traffic regulations (1 Other Organisation and 7 Individual Members of the Public);
 - Remove bus and cycle lanes or other restrictions to traffic flow (6 Individual Members of the Public);
 - Implement a pilot congestion charging scheme (6 Individual Members of the Public); and

- Changes to parking provisions – reducing the number of spaces or increasing fees (2 Stakeholders, 1 Other Organisation and 6 Individual Members of the Public).

Monitoring

- F.5.91 9 Stakeholders and 4 Individual Members of the Public called for close monitoring of the scheme's effects; and 1 Stakeholder and 2 Other Organisations called for monitoring programs to be clearly defined. There were a number of very specific representations about monitoring, focussing on particular targets for monitoring (improvements in public transport, impacts on parking, effects on the economy and the environment, the effects of discounts and exemptions, and the impact of the hours of operation).
- F.5.92 Respondents underlined the importance of comprehensive assessment of the effects of the congestion charging scheme, to be measured against clear baselines, with the results to be reported publicly. The role of contributions to TfL's monitoring programme from other organisations was stressed. There was also mention of a need for flexibility, in order that changes could be made to the scheme if warranted by the results of monitoring.

Health Services

- F.5.93 Concerns were expressed by 5 Stakeholders, 5 Other Organisations and 7 Individual Members of the Public about the effect the proposed congestion charging scheme might have on the health services. These concerns centred on the impact of the scheme on patients seeking healthcare within the zone due to the costs incurred driving to appointments. The other significant concern was the possible impact of the scheme on the NHS in terms of increased costs, and problems in recruitment/retention of staff (this is also discussed at paragraph F.5.18). There was also some concern that increased traffic on boundary roads could increase emergency response times.

Scheme Operations and Payment of the Charge

- F.5.94 3 Stakeholders, 2 Other Organisations and 2 Individual Members of the Public expressed concerns about the ease of purchase of the licence by drivers. It was stressed that the processes needed to be clear and simple, efficient and user-friendly. 2 Stakeholders mentioned a need for discussions with retailers about their role in selling licences.
- F.5.95 1 Stakeholder and 4 Individual Members of the Public were concerned that the scheme as a whole was too complex for users to understand, as well as complex to administer.

Effect on Urban Regeneration

- F.5.96 Concerns were expressed about the impact of the scheme on regeneration, investment and economic activity, due to increased costs for business of operating in central London: 1 Stakeholder, 3 Other Organisations and 10 Individual Members of the Public. This was connected with the concerns about impacts on business considered at paragraph F.5.18.

Level of Charge

- F.5.97 Representations about the level of the congestion charge were made by 1 Stakeholder, 1 Other Organisation and 20 Individual Members of the Public. The Stakeholder and 1 Individual Member of the Public were concerned about possible future increases in the charge level. The Other

Organisation, and 2 Individual Members of the Public, were concerned that the charge was too high for people on low incomes. 3 additional Individual Members of the Public considered that the charge was too high generally.

F.5.98 However, 11 Individual Members of the Public considered that the charge was too low – with some concerns that it would not act as a sufficient disincentive to high earners, or that it would not cover administrative costs.

F.5.99 Some Individual Members of the Public also mentioned ways in which the charge could be varied to better reflect the social costs of driving, such as the amount of time spent driving in congested areas, or the size of the vehicle (detailed in Appendix B).

Cycling

F.5.100 Specific representations relating to cycling were made by 1 Other Organisation and 10 Individual Members of the Public. They called for more cycle lanes and better facilities for cyclists.

Technology

F.5.101 1 Stakeholder was concerned about the ability of the call centre and registration system to cope with peak levels of demand. Another Stakeholder and 1 Individual Member of the Public commented that a more sophisticated electronic payment system was needed. 1 Other Organisation was concerned that the technology for the congestion charging scheme was not proven, and requested more assurance of its effectiveness. 1 Stakeholder and 1 Individual Member of the Public considered that the camera system would be inadequate for the needs of the proposed scheme.

F.6 Summary

- F.6.1 The primary objective of this consultation was to elicit representations to TfL's proposed modifications to the made Scheme Order. It was expected that there would be fewer respondents than to the July consultation. This was proved to be the case with 84 Stakeholders, 97 Other Organisations and 352 Individual Members of the Public responding to this consultation.
- F.6.2 The majority of the Stakeholders who responded did not offer an explicit opinion on support or opposition to the scheme but of those that did, 24 supported and 14 opposed the scheme as a whole. Among Other Organisations and Individual Members of the Public there was a balance against the scheme, even though around half of both these groups did not offer an explicit opinion either way. This analysis of opposition and support should be treated with extreme caution for reasons discussed in Section 2: there was a significant skew towards opponents of the scheme, wishing to register their objections, whereas supporters of the scheme were less motivated, particularly if they had already responded to the first consultation.
- F.6.3 Of all the proposed modifications which received significant comment, all except three received a balance of respondents in favour of the modifications. The exceptions were the changes to the estimates of net revenues from the scheme, the proposed removal of the discount for Royal Mail vehicles and the proposed restriction on residents to register only one vehicle for a discount, where opinion was divided equally. The low numbers of respondents means that these proportions may not be representative.
- F.6.4 Most of the respondents took the opportunity of the new consultation to make representations on those aspects of the scheme which were not subject to proposed modifications. Some respondents also commented that representations they had made during the July 2001 consultation had not resulted in changes to the Scheme Order that fully met their concerns.
- F.6.5 Of those that responded to the proposed modifications the most frequently mentioned issues were:
- End of charging at 6.30 p.m. (20 Stakeholders, 8 Other Organisations and 23 Individual Members of the Public);
 - NHS discount scheme (23 Stakeholders, 4 Other Organisations and 11 Individual Members of the Public);
 - Exemption for mini-cabs (14 Stakeholders, 4 Other Organisations and 9 Individual Members of the Public);
 - Extension of alternative fuel discount (11 Stakeholders, 7 Other Organisations and 3 Individual Members of the Public);
 - Changes to estimated net revenues (14 Stakeholders, 2 Other Organisations and 3 Individual Members of the Public);
 - Widened geographical eligibility for Blue Badge holders' discount (14 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public);
 - Widened eligibility of the exemption for PSVs with 9+ seats, and for community buses (14 Stakeholders, 2 Other Organisations and 1 Individual Member of the Public);
 - End of £5 charge at 8 p.m. (11 Stakeholders, 3 Other Organisations and 11 Individual Members of the Public);
 - New fleet account systems (11 Stakeholders, 3 Other Organisation and 2 Individual Members of the Public); and
 - Fire-fighters' discount scheme (9 Stakeholders, 2 Other Organisations and 9 Individual Members of the Public).

F.6.6 The majority of the proposed modifications received a balance of support from respondents. There were specific issues raised by those opposed to certain modifications, which included:

- those who wanted the charging time extended or decreased;
- concerns over a build up of traffic on the Inner Ring Road as a result of the proposed shortened charging hours;
- potential abuse of various discounts e.g. those proposed for the NHS, firefighters, mini-cabs and Blue Badge holders;
- concern that the reduction in the estimate of net revenue reduces the value of the proposed scheme;
- a desire for the alternative fuel discount to be extended further;
- concerns that the proposed fleet account system does not go far enough to support business; and
- concern about the impact of charging on Royal Mail.

F.6.7 There were many respondents that made representations on the scheme as a whole, some reiterating points they made during the made Scheme Order consultation, or on areas of the scheme which were not modified. It is not considered that these further representations on the scheme or the lack of a modification in some areas add greatly to the analysis of representations to the first Scheme Order consultation, except in the sense that some respondents considered that as TfL had not made modifications to reflect their concerns, the consultation had not taken their views into account.

F.6.8 The main issues raised on the scheme as a whole were:

- concern about public transport improvements;
- concern about the impact on London's business community (including some calls for a blanket exemption for commercial vehicles);
- concerns that consultation had not been sufficient (with some calls for a public inquiry);
- concerns regarding equity or civil liberties;
- concerns about increased traffic and other negative impacts on the boundary (with Kennington Lane being a particular issue);
- calls for extensions or additions to the exemption and discount categories; and
- concerns about the ability of the scheme to deliver decongestion.

Appendix A

Petition 1

Organiser of petition: Princes Ward Labour Action Group, Lambeth

Number of signatures: 39

Summary of petition:

Oppose the position of the congestion charging zone boundary at Kennington Lane.

- Agree with the principle of congestion charging but object to the boundary route.
- Fear that the boundary will sever the community.
- Consider this community severance would be unfair because those inside the zone would benefit, but those outside may suffer from increased congestion, pollution, and danger; reduced house prices; increased cost of living and deterioration in quality of life.
- Object because those outside the congestion charging zone will have to pay to use local amenities.
- Consider that the road is too narrow to cope with increased traffic.
- Call for an environmental impact assessment.
- Endorse proposals to reroute the boundary to Kennington Park Road, Kennington Oval and Harleyford Road.
- Also feel that a sufficient public transport alternative has not yet been provided; and that better public transport is needed particularly at the boundary of the proposed charging zone.

Petition 2

Organiser of petition: Kennington Association

Number of signatures: 260

Summary of petition:

Oppose the congestion charging zone boundary passing through Kennington.

- Consider that this would split the community and affect its residential nature.
- Fear increased local noise, nitrogen oxide and particulate pollution.
- Favour a smaller experimental zone bounded by Victoria or Albert Embankment.
- Not convinced that traffic or environmental conditions would be improved by congestion charging.
- Call for an environmental assessment to be made on the Inner Ring Road.

Appendix B

This table contains the representations which were made by fewer than 5 Individual Members of the Public. Although TfL has taken these representations into consideration during the analysis of the consultation results, they have not been given a direct response by TfL in the preparation of the report to the Mayor.

Theme	Representation	Number of Respondents
Boundary	Concerned that the size of the charging zone will increase in future	2
Boundary	Object to the proposal for a 'hard-wired' scheme, particularly when the boundary is set by expediency rather than to fundamentally benefit the scheme	1
Boundary	Concerned about the impact on the boundary of roadworks around Kings Cross until 2009	1
Boundary	The boundary is disproportionately unfair for those in South East London; while the North appears to do fairly well	1
Boundary	Many commuters will need to use Vauxhall Bridge; but the bus lanes there increase congestion	1
Complementary Transport Measures	The Tube is uncomfortable / too hot	4
Complementary Transport Measures	There is a lack of public transport in the local area	3
Complementary Transport Measures	Bus driving standards should be improved	3
Complementary Transport Measures	There should be more parking for cycles and motorcycles	3
Complementary Transport Measures	There should be more rail services at night	3
Complementary Transport Measures	The number of bus conductors should be increased	2
Complementary Transport Measures	Open the bus lanes for motorcycles/minicabs/ other vehicles	2
Complementary Transport Measures	There should be better motorcycle facilities	2
Complementary Transport Measures	Roads in and around the central zone should be widened	2
Complementary Transport Measures	Trams should be reintroduced in central London	2
Complementary Transport Measures	Increase parking restrictions and enforcement	2
Complementary Transport Measures	States that there is no tube, and only one bus route, from Wandsworth into the charging zone	1
Complementary Transport Measures	Build painted rather than physically separated cycle lanes - the latter are slow and narrow	1
Complementary Transport Measures	There is poor communication/information on the Tube	1
Complementary Transport Measures	Drivers using cycle lanes should be penalised	1
Complementary Transport Measures	Introduce Smart Card	1
Complementary Transport Measures	There should be more pedestrianisation	1
Complementary Transport Measures	The capacity of the road network should be increased	1
Complementary Transport Measures	There should be more Underground services at night	1
Complementary Transport Measures	There should be better access for people with restricted mobility on Underground	1
Complementary Transport Measures	Penalise bad drivers more strongly	1
Complementary Transport Measures	Restore long distance bus routes	1
Complementary Transport Measures	Pushing more people onto public transport will put lives seriously at risk	1
Complementary Transport Measures	The scheme would upset the current balance of transport use and make movement across London more difficult rather than less	1
Consultation	There has been inadequate consultation of residents	2
Consultation	Surveys showing that most are in favour of charging are manipulated	1
Consultation	On-street notices for the consultation caused an injury	1

Annex F: Analysis of Representations to the December 2001 Consultation

Consultation	Want to know what a Stakeholder is; and how were they identified	1
Consultation	Legal action against TfL will be pursued if pollution levels on the boundary exceed EU limits	1
Consultation	Object to inadvertent disclosure of email address	1
Consultation	The email address for feedback did not work	1
Days & Hours of Operation	Charging should be extended to weekends	3
Days & Hours of Operation	The end of the charging hours is still too late to allow theatre goers to drive to performances	3
Days & Hours of Operation	Charging should operate 24 hours a day	2
Discounts & Exemptions - Black Cabs	Black cabs should not be exempt	4
Discounts & Exemptions - Firefighters	How will the reimbursement scheme work if firefighters do not get a discount for the journey to work?	2
Discounts & Exemptions – Motorbikes/Mopeds	Powered two-wheelers should not be exempt because they do cause congestion	4
Discounts & Exemptions – Motorbikes/Mopeds	The scheme will increase the number of motorbikes on the roads	3
Discounts & Exemptions – Motorbikes/Mopeds	Motorbikes should pay a reduced charge rather than be exempt	2
Discounts & Exemptions - New Proposals	Parents travelling with children should be exempt	4
Discounts & Exemptions - New Proposals	People who need to be in the charging zone should be exempt	3
Discounts & Exemptions - New Proposals	Only charge visitors/commuters to London	3
Discounts & Exemptions - New Proposals	Those who live just outside the charging zone but whose car is parked just inside the zone should be exempt	2
Discounts & Exemptions - New Proposals	Operate discounts on the basis of case-by-case assessment	2
Discounts & Exemptions - New Proposals	Diplomatic vehicles should be exempt	1
Discounts & Exemptions - New Proposals	Teachers insured to drive students to hospital should have the same discount standing as NHS staff	1
Discounts & Exemptions - New Proposals	Provide a free day per week for everyone	1
Discounts & Exemptions - New Proposals	Those travelling against the main flow of traffic should be exempt	1
Discounts & Exemptions - Residents' Vehicles	Second home owners who do not qualify for residential status should be exempt	1
Discounts & Exemptions - Residents' Vehicles	Residents should receive a smaller discount (e.g. 50%)	1
Discounts & Exemptions - Residents' Vehicles	Query whether MPs/VIPs etc live in the extended residents' discount areas	1
Discounts & Exemptions - Residents' Vehicles	Contractually parked cars should receive a residents' discount	1
Discounts & Exemptions – Royal Mail	Why should Royal Mail be exempt when private couriers aren't?	1
Impacts – Businesses	British hauliers will lose out because foreign lorries will not pay	1
Impacts – Environmental	Air quality will improve	3
Impacts – Environmental	Will consider legal action if pollution on the charging zone boundary exceeds EU limits	2
Impacts – Traffic	Concerned for the environment unless congestion charging is introduced soon	2
Impacts – Environmental	Health will improve due to reduced pollution	1

Annex F: Analysis of Representations to the December 2001 Consultation

Impacts – Social / Economic	Delays from more people using public transport will cost London money	2
Impacts – Social / Economic	The scheme will create a two-tier London and will be inconvenient for Londoners	1
Impacts – Social / Economic	Ordinary people will be priced out of attending cultural events	1
Impacts – Traffic	Companies will absorb the cost of charge	3
Impacts – Traffic	The scheme will reduce bus journey times	3
Impacts – Traffic	The maximum practical/legal speed is only 15mph	1
Impacts – Traffic	The scheme will not encourage drivers to use public transport; they will pay to avoid public transport	1
Impacts – Traffic	Reduced congestion will encourage more people to drive	1
Impacts – Traffic	The scheme will result in better conditions for cyclists and pedestrians	1
Information / Communications	Concern that some drivers may be unfamiliar with the city centre's roads, so may enter the zone by accident	4
Level of Charge	Levy a higher charge for HGVs	1
Level of Charge	Vary the charge by according to the 'zones' driven in	1
Level of Charge	The charge should be based on amount of time spent inside the charging zone	1
Level of Charge	The level of charge should be relative to an individual's ability to pay	1
Level of Charge	The level of charge should be relative to the size of the car/engine	1
Payment Method	Do not provide a fleet account facility for company cars as they create congestion	1
Principle of Congestion Charging	The congestion charge is a regressive tax	4
Principle of Congestion Charging	Motorists will be spied on	3
Principle of Congestion Charging	Parents have a right to ensure their children get to school safely	3
Principle of Congestion Charging	Congestion has to be accepted as part of life in London	2
Principle of Congestion Charging	People do not make unnecessary journeys into London	2
Principle of Congestion Charging	The congestion charge is an inefficient tax	1
Principle of Congestion Charging	Do not see why car owners should pay for public transport improvements	1
Principle of Congestion Charging	It is wrong to say congestion is the biggest problem facing London- people are more concerned about crime etc	1
Principle of Congestion Charging	It is scandalous that Capita, who will benefit greatly from the congestion charge administration, has done the consultancy	1
Scheme Operation	How will the issue of false registration plates be addressed?	2
Scheme Operation	No tax concessions should be allowed for charges under the scheme	2
Scheme Operation	During an Underground strike, you are now going to penalise the workers for trying to get to work, thus assisting the unions in obtaining their hold back to the 1970s	1
Scheme Operation	Reoffenders should be prosecuted	1
Scheme Operation	There should be strict enforcement of the congestion charge	1
Scheme Operation	The penalty charge is appropriate	1
Suggested Alternatives	Slow traffic down for pedestrian/cyclist safety	4
Suggested Alternatives	Introduce multi-occupancy lanes	3
Suggested Alternatives	Implement park & ride facilities to encourage drivers not to enter the central zone	3
Suggested Alternatives	Restrict the number of days on which people can drive into London	2
Suggested Alternatives	Increase road capacity	2
Suggested Alternatives	Improve driving standards	1

Annex F: Analysis of Representations to the December 2001 Consultation

Suggested Alternatives	Parking should be in proper laybys to assist traffic flow	1
Suggested Alternatives	Untaxed/uninsured vehicles should be removed by better enforcement	1
Suggested Alternatives	Broken down vehicles should be removed speedily	1
Suggested Alternatives	Make the central zone car free	1
Suggested Alternatives	Limit the number of vehicles per household	1
Suggested Alternatives	Utilities should carry out work outside peak times	1
Suggested Alternatives	More elevated sections of road	1
Suggested Alternatives	Have tolls for main roads	1
Suggested Alternatives	On a longer-term basis, change planning laws to minimise journeys (build schools, shops, accommodation etc in one place so you can get to them in one journey)	1
Suggested Alternatives	Make one side of the Thames one-way Eastbound and the other side one-way Westbound	1
Suggested Alternatives	A lack of affordable housing causes congestion by commuters	1
Suggested Alternatives	Charge those on the school run	1
Suggested Alternatives	Charge vehicles that are unnecessarily big – 4 wheel drives and estate cars	1
Suggested Alternatives	Only hydrogen cell technology cars should be allowed to enter cities	1
Use of Net Revenues	Spend revenue on better transport options for scheme 'losers' e.g. boundary residents	1