

Annex C: Summary of stakeholder representations received

Introduction

This annex is a summary of all stakeholder responses received during the consultation period, 10 August 2007 to 19 October 2007. The stakeholders are listed by organisation category. An alphabetical list of the stakeholders who responded is included at Appendix 3.

The representations received focused on:

- The principle of emissions related congestion charging
- The timetable of the proposals
- Suggested alternatives to emissions related congestion charging
- The proposed level of charge
- The operation of the proposals
- The alternative fuel discount
- Potential transport impacts
- Potential environmental impacts
- Potential social and economic impacts
- Discounts and exemptions
- The proposed Euro V incentive
- Public information

Category No.	Category and organisation name
1.	Black, Asian and Minority Ethnic Representative Organisations
	Arab Community Association
2.	Business Representative Groups
	CBI
	Covent Garden Market Authority
	Forum of Private Business
	London First
3.	Central Government Departments
	Ministry of Defence
4.	Disability and Mobility Groups
	Association of Disabled Professionals
	Black Disabled People's Association (BDPA)
	Mobilise
5.	Economic and Regeneration Partnerships
	Central London Partnership
6.	Emergency Services Providers
	Metropolitan Police Authority (MPA) and Metropolitan Police Service (MPS)
7.	Freight / Haulage Representative Organisations
	Freight Transport Association
	Road Haulage Association
8.	GLA Functional Bodies and Commissions
	London Sustainable Development Commission
	London TravelWatch
9.	Health Organisations
	British Red Cross
	National Performance Advisory Group for the NHS
10.	Lesbian, gay and bisexual organisations
	Stonewall
11.	Local Government Associations
	London Councils

12.	London Boroughs
	City of London
	City of Westminster
	London Borough of Bexley
	London Borough of Brent
	London Borough of Camden
	London Borough of Croydon
	London Borough of Ealing
	London Borough of Hackney
	London Borough of Harrow
	London Borough of Hounslow
	London Borough of Lambeth
	London Borough of Lewisham
	London Borough of Newham
	London Borough of Richmond Upon Thames
	London Borough of Southwark
	London Borough of Tower Hamlets
	London Borough of Waltham Forest
	London Borough of Wandsworth
	Royal Borough of Kensington and Chelsea
13.	London MPs and MEPs
	Gerard Batten MEP (UKIP)
14.	London Political Representatives
	London Assembly Conservative Group
	London Assembly Green Group
	London Assembly Liberal Democrats Group
15.	Motoring Organisations
	Association of British Drivers
	Federation of British Historic Vehicle Clubs
	IAM Motoring Trust (formerly the AA Motoring Trust)
	RAC Foundation
16.	NHS trusts and health authorities within Greater London
	Barnet, Enfield & Haringey Mental Health NHS Trust
	Bromley Primary Care Trust
	Chelsea and Westminster Hospital NHS Foundation Trust
	London Ambulance Service NHS Trust
	Southwark Primary Care Trust

17.	Non Departmental Public Bodies, Executive Agencies and Public Trusts
	Environment Agency
	Olympic Delivery Authority
	Parking and Traffic Appeals Service
	Parliamentary Advisory Council for Transport Safety
	Vehicle Certification Agency (VCA)
18.	Trade Associations
	British Vehicle Rental and Leasing Association (BVRLA)
	Environmental Industries Commission (EIC)
	LP Gas Association
	Natural Gas Vehicle Association
	Renewable Energy Association
	Society of Motor Manufacturers and Traders (SMMT)
19.	Transport and Environment Representative Organisations
	Alliance Against Urban 4x4s
	Campaign for Better Transport (formerly Transport 2000)
	Campaign for Clean Air in London
	CTC
	Energy Saving Trust
	Friends of Capital Transport
	Friends of the Earth
	Greenpeace
	Living Streets
	NSCA (formerly the National Society for Clean Air and Environmental Protection)
20.	Utility companies
	Royal Mail

1. Black, Asian and Minority Ethnic Representative Organisations

- **Arab Community Association**

The Arab Community Association considers that the low CO₂ discount and the higher charge will act as effective incentives to use lower emitting cars and notes that the congestion charge should help to free road space for buses as well as improve air quality.

2. Business Representative Groups

- **CBI**

The CBI accepts that greater consideration needs to be given to the impact of individual choices on society as a whole and acknowledges that business must play a leading role. However, any proposals must conform to certain principles, principally that they should seek to affect behaviour, not raise revenue and that the overall tax burden should not increase. The proposals for emissions related congestion charging do not conform to these principles. Furthermore, the proposals shift the emphasis away from tackling congestion and the CBI considers that the result for business will be a further round of increased costs without any clear benefits.

- **Covent Garden Market Authority**

The Covent Garden Market Authority considers that although the proposals ostensibly relate to private and not commercial vehicles, the impact on small businesses, many of which use non-commercial vehicles (ie pick-ups, estates cars, 4x4/SUV) for business purposes, is disproportionate. For example, contract florists using the Flower Market, or caterers using the Fruit & Vegetable Market, often use vehicles of these types for both private and commercial purposes. Their business is often conducted within the Congestion Charging zone and so they will face higher costs. It is not always possible for these companies to replace their vehicles every six years.

- **Forum of Private Business**

The Forum of Private Business is concerned that smaller firms in particular would find it very costly to upgrade their vehicles and that the value of older vehicles would decrease as a result of the proposals.

- **London First**

London First supports the principles that underpin the proposals but has concerns about the likelihood of increased congestion and that the proposals have a minimal impact on London's vehicle emissions. It suggests that the Mayor and TfL weaken the financial incentive for the low CO₂ discount and speed up measures for public transport improvements and new road user charging schemes advocated by Transport 2025 across Greater London.

3. Central Government Departments

- **Ministry of Defence**

The Ministry of Defence requests that its range of vehicles be included in the "Special Partners" category for which band G cars would not be charged. It highlights administrative difficulties in tracking its vehicles and believes this request complements its current status with regard to the Congestion Charge.

4. Disability and Mobility Groups

- **Association of Disabled Professionals**

The Association of Disabled Professionals considers that this policy would not work as disabled people and others exempt from the Congestion Charge could be driving cars with high emissions through necessity and suggests that there needs to be another method of dealing with this issue.

- **Black Disabled People's Association**

The Black Disabled People's Association agrees that action should be taken to reduce CO₂ emissions and supports the work of the Mayor and TfL.

- **Mobilise**

Mobilise is pleased that the exemption from the Congestion Charge for Blue Badge holders will continue under the proposals because disabled people are frequently not in a position to choose what vehicle they travel in.

5. Economic and Regeneration Partnerships

- **Central London Partnership**

The Central London Partnership is concerned that the proposals for the low CO₂ discount could undermine the decongestion benefits of the zone and increase air pollution. It proposes that only band A cars be eligible for a 100 per cent discount and band B cars be subject to a reduced charge, for example a 50 per cent discount.

6. Emergency Services Providers

- **Metropolitan Police Authority and Metropolitan Police Service**

The Metropolitan Police Authority and Metropolitan Police Service welcome the proposal to link the level of charge directly to vehicle emissions but consider that it is important that there is an exemption for Selected Partners' vehicles where an operational requirement related to the performance of the vehicle can be demonstrated.

7. Freight/ Haulage Representative Organisations

- **Freight Transport Association**

The Freight Transport Association broadly supports the shift towards an emissions-based charging structure and considers there will be some reduction in congestion as well as the intended reductions in CO₂. It would like to see a more sophisticated approach to the Alternative Fuel Discount. It welcomes the proposal to introduce a discount for Euro V vehicles but is disappointed about the short period for which it will apply.

- **Road Haulage Association**

The Road Haulage Association welcomes the proposal for a discount for Euro V lorries and vans and states that this discount should apply to all Euro V engines, whether fitted with de-powering units or not, but has concerns that the linkages in these proposals with the Low Emission Zone are confusing.

8. GLA Functional Bodies and Commissions

- **London Sustainable Development Commission**

The London Sustainable Development Commission supports the proposals but would like to see close monitoring of the impact on low income families, community services and on public transport. It expresses concern that a 100 per cent discount for low CO₂ cars could increase congestion and suggests a smaller discount instead. It also suggests that the proposals should form part of a more complete package, including personal carbon trading, to encourage and assist Londoners to make sustainable and informed choices.

- **London TravelWatch**

London TravelWatch has no objection in principle to the proposals provided it does not negate the decongestion benefits. It suggests that the residents' discount should continue for a limited period and while it does not object to the proposed 100 per cent discount suggests that a sliding scale of charges is considered when the scheme is reviewed.

9. Health Organisations

- **British Red Cross**

The British Red Cross does not support the proposals and does not consider that they are relevant to the Congestion Charge. It suggests that implementation be deferred to give drivers time to change vehicle models.

- **National Performance Advisory Group for the NHS**

The NHS National Performance Advisory Group and National Patient Transport Modernisation Group cautiously support the proposals but has concerns about the impact on the NHS and patient choice of the capping of the NHS reimbursement scheme.

10. Lesbian, gay and bisexual organisations

- **Stonewall**

Stonewall does not identify an equality impact relating to sexual orientation from the proposals and has no comment.

11. Local Government Associations

- **London Councils**

London Councils is concerned about the cost effectiveness of the proposals, that the proposals are not primarily aimed at reducing congestion and could further erode the benefits of the initial Congestion Charging zone while having a minimal impact on CO₂. Furthermore, it is concerned about the proportionality of the £25 charge, particularly for residents. It suggests that a more cost effective alternative would be tackling CO₂ emissions from taxis and that safeguards be included for people who already own cars that would no longer qualify for discounts from the charge.

12. London Boroughs

- **City of London**

The City of London opposes the current proposals, though the objection would be withdrawn if the low CO₂ discount were removed. The City is concerned that the discount would lead to a dramatic uptake in use of band A and B cars in the zone, leading to increased congestion, with negative environmental impacts. It is also concerned that the scheme could lead to an increase in diesel-engined vehicles, which could lead to a deterioration in air quality in the area, making achieving statutory air quality objectives more difficult. The City also proposes that the residents' discount for those residents owning a car liable for the higher charge should be phased out, to allow people to consider the most appropriate vehicle that they would purchase on replacement.

- **City of Westminster**

The City of Westminster opposes the proposals and does not believe they are the most effective or serious way to approach either congestion or air pollution. It suggests the Low Emission Zone would be a more effective way of reducing pollution across London and that the higher charge penalises motorists in central London to a disproportionate extent compared to those using similar vehicles in Outer London.

- **London Borough of Bexley**

The London Borough of Bexley considers that congestion charging is an inappropriate tool for reducing CO₂ emissions, so does not support the proposals. In particular, it has concerns that the low CO₂ discount could lead to an increase in congestion in the zone and the higher charge an increase in the use of high-emitting taxis. It also considers that the scheme offers poor value for money given the relatively low estimated CO₂ reductions. Bexley also has concerns that the benefits of the scheme would only be realised once band G vehicles are scrapped altogether, rather than simply being used outside London, and it also states that the premature scrapping of band G vehicles would have an environmental cost.
- **London Borough of Brent**

London Borough of Brent supports the principle of the proposals, but is concerned that the low CO₂ discount could result in an increase in congestion within the zone.
- **London Borough of Camden**

The London Borough of Camden does not oppose the principle of differential Congestion Charging tariffs based on CO₂ emissions but considers that the current proposals are flawed in detail and should be amended. Camden would support a proposal where the higher charge was 50 per cent more than the standard charge, the discount for low CO₂ cars was set at 50 per cent of the standard charge, the proposals were revenue neutral and the 90 per cent residents' discount was retained.
- **London Borough of Croydon**

The London Borough of Croydon supports the proposals and notes that there may be benefits for Croydon where drivers are encouraged to use cleaner vehicles or public transport. However it does not agree that Euro 4 compliance for alternatively-fuelled vehicles should be identified by the registration date of the vehicle since many of these vehicles which were registered before 1 January 2005 will also meet this standard.
- **London Borough of Ealing**

London Borough of Ealing supports the recommendations made by London Councils.
- **London Borough of Hackney**

The London Borough of Hackney welcomes the linking of CO₂ emissions to variable charging, although it is concerned that the discount for band A and B vehicles undermines the promotion of walking, cycling and public transport and may also result in increased congestion.
- **London Borough of Harrow**

London Borough of Harrow supports the recommendations made by London Councils.

- **London Borough of Hounslow**
The London Borough of Hounslow supports any well thought out initiative to reduce vehicle emissions. The overall reduction in CO₂ emissions of the scheme, while projected to be small, is by no means insignificant. Nevertheless, Hounslow is concerned by the possible increase in congestion that could be caused by the low CO₂ discount, especially in the light of recent increases in congestion within the zone.
- **London Borough of Lambeth**
The London Borough of Lambeth welcomes the proposal. It has reservations regarding the proposed 100 per cent discount for cars with low CO₂ emissions and those that meet Euro 4 standard for air quality as the 100 per cent discount may lead to a steep increase in vehicles of this type, resulting in more congestion and an increase in road collisions. It proposes that vehicles eligible for the low CO₂ discount be charged a nominal fee.
- **London Borough of Lewisham**
The London Borough of Lewisham has no comments on the proposals.
- **London Borough of Newham**
The London Borough of Newham does not believe that the Congestion Charging Scheme is an appropriate mechanism for achieving emissions objectives and the scheme as proposed runs the risk of reducing decongestion benefits. It suggests modifications including a graduated charge, safeguards for residents on low incomes with a band G car and an exemption from the higher charge for borough operational vehicles.
- **London Borough of Richmond Upon Thames**
The London Borough of Richmond Upon Thames fully supports the proposals but considers that the proposals would encourage more drivers to move to a lower CO₂ emitting car if the proposals were modified to include seven price bands (based on VED bands) with a 100 per cent discount for band A cars, a 50 per cent discount for band B cars and progressively increasing charges for the remaining bands, incorporating pre-2001 registered cars into the bands on the basis of their engine capacity.
- **London Borough of Southwark**
The London Borough of Southwark supports the initiative but suggests the introduction of a sliding scale across VED payment bands and a greater geographical area should be considered. It suggest that the 100 per cent discount may erode decongestion benefits and that the CO₂ emissions from taxis should also be addressed. Finally, it has concerns about the potential impacts on small business owners, van drivers and the council following the removal of the alternative fuel discount.

- **London Borough of Tower Hamlets**
The London Borough of Tower Hamlets supports the proposals while questioning whether it is appropriate to offer a 100 per cent discount to cars which still produce CO₂ emissions and contribute to congestion, and supports the full review of the scheme in 2010.
- **London Borough of Waltham Forest**
The London Borough of Waltham Forest supports the proposals and considers them to be consistent with its objective of improving the health and well being of local people by encouraging Londoners to purchase and run more environmentally friendly and less polluting cars. It is introducing its own scheme for variable charges for residents' parking permits based on the CO₂ emissions of the vehicle.
- **London Borough of Wandsworth**
The London Borough of Wandsworth considers that not enough information has been made available about the impacts of the proposals and that there should have been a two stage consultation. It is concerned that the main purpose of Congestion Charging is weakened by the proposals and that national and international action is needed on carbon emissions.
- **Royal Borough of Kensington and Chelsea**
The Royal Borough of Kensington and Chelsea has concerns about the purpose of the proposals. Whilst TfL states that the main aim of Congestion Charging remains to reduce congestion in the zone, this is set against a forecast that the proposals would have an uncertain impact on congestion. It has particular concerns about the potential impact of the removal of the residents' discount for residents with cars liable for the higher charge and suggests that the higher charge would be disproportionate and unfair for these residents. Kensington and Chelsea also consider that the closure of the Alternative Fuel Discount would give out an inconsistent message which could discredit wider efforts to encourage a switch to less polluting vehicles. Kensington and Chelsea also sought an exemption for borough operational vehicles liable for the higher charge, in the same way that Selected Partners would be eligible for an exemption.

13. London MPs and MEPs

- **Gerard Batten MEP (UKIP)**
Mr Batten, Member of the European Parliament for London (UK Independence Party), opposed the original Congestion Charging scheme and opposes these proposals. He considers that the primary purpose of the proposals would be to raise revenues and is concerned this will impact on families and poorer people.

14. London Political Representatives

- **London Assembly Conservative Group**

The London Assembly Conservative Group considers that the proposals are not economically sensible and will have little impact on CO₂ and air quality emissions, particularly since the poorest vehicles environmentally are exempted from the proposals. While understanding the need for the residents' discount, it has created congestion problems and although reducing or eliminating this discount would increase charge revenue and increase traffic speed in the zone, it would also underline the Mayor's willingness to ride roughshod over public opinion. It is concerned that the low CO₂ discount will lead to increased congestion and that the proposals do not take account of other causes of congestion, such as rephasing of traffic lights and increasing amounts of road works.

- **London Assembly Green Group**

The London Assembly Green Group welcomes the proposals and supports the higher charge, the withdrawal of the Alternative Fuel Discount and the ending of the residents discount for vehicles liable for the higher charge. However it recommends that vehicles in bands A and B be subject to a £4 daily charge which would incentivise the use of less polluting vehicles while maintaining the financial incentive to use public transport, cycle or walk. It has concerns that increased sales of band A and B cars in London may undermine the benefits of the proposals.

- **London Assembly Liberal Democrats Group**

The London Assembly Liberal Democrat Group supports the Mayor's proposals, as it had previously called for the Congestion Charge to be doubled on high-emitting sport utility vehicles. While the proposals could lead to a rise in congestion levels, providing the low CO₂ discount could prove effective in encouraging take-up of less polluting vehicles. This would be important not only for reducing pollution levels in central London and beyond. Whilst the reductions in pollutants would not be significant, the proposals should be seen as being 'emblematic' and designed to change attitudes. However, for this reason, it is important that vehicles under TfL's control have low levels of emissions.

15. Motoring Organisations

- **Association of British Drivers**

The Association of British Drivers does not consider that these proposals are likely to be effective in reducing CO₂ emissions, and may even have a negative impact if the number of band A and B vehicles entering the zone increases. It believes that the scheme will be costly to implement and suggests that the motivation for it is to raise revenue from a small group of drivers. Finally it believes that there are already sufficient tax incentives for the purchase of lower emitting cars and notes that CO₂ emissions from cars have already fallen due to the efforts of vehicle manufacturers.

- **Federation of British Historic Vehicle Clubs**
The Federation of British Historic Vehicle Clubs is concerned that owners of historic vehicles with engines over 3,000cc will be subject to the higher charge, including residents.
- **IAM Motoring Trust (formerly the AA Motoring Trust)**
IAM Motoring Trust (formerly the AA Motoring Trust) is not opposed to the principle of using the Congestion Charge to tackle vehicle emissions. However it is concerned that while a reduction in the number of larger, heavier cars in central London may deliver safety benefits, some owners may trade their one large vehicle for two smaller cars and thereby increase the total number of cars and the potential for collisions.
- **RAC Foundation**
The RAC Foundation is concerned that the proposals may serve to increase congestion and so have a negative impact on air quality. It suggests that there need to be greater lead-in times for changes to the scheme so that manufacturers have time to develop appropriate vehicles and drivers can have confidence in the long-term viability of their purchasing decisions.

16. NHS trusts and health authorities within Greater London

- **Barnet, Enfield & Haringey Mental Health NHS Trust**
Barnet, Enfield & Haringey Mental Health NHS Trust is not directly affected by the proposals but supports the principle of charging in relation to the efficiency of the vehicle.
- **Bromley Primary Care Trust**
Bromley Primary Care Trust supports the proposals in principle but has concerns about the negative effects on CO₂ outside London if higher-polluting vehicles are redistributed, the effect on disabled people not eligible for a Blue Badge and the added public transport costs to families whose vehicle would be liable for the higher charge.
- **Chelsea and Westminster Hospital NHS Foundation Trust**
Chelsea and Westminster Hospital has no objection to the proposals.
- **London Ambulance Service NHS Trust**
The London Ambulance Service welcomes initiatives that would improve the environment, but has specific operational concerns. In particular, some leased cars for private use which have to be a certain size as they are used occasionally to respond to emergencies, would be liable for the higher charge.
- **Southwark Primary Care Trust**
Southwark Primary Care Trust welcomes the introduction of emissions related congestion charging. It is however concerned that the health benefits of the scheme appear to be minor and encourages the Mayor and TfL to take greater steps to address the problem of air pollution and its impact on health across the capital.

17. Non Departmental Public Bodies, Executive Agencies and Public Trusts

- **Environment Agency**
The Environment Agency supports charging road users, providing there is an environmental benefit. It is concerned by the potential shift to more diesel cars and suggests an air quality emissions standard applying for bands C-F vehicles or a separate category for vehicles that meet the CO₂ emissions requirements of these bands, but that have higher comparative particulate and nitrogen oxide emissions.
- **Olympic Delivery Authority**
The Olympic Delivery Authority has no objections to the variation order in regards to passenger cars and good vehicles and notes that the charge will continue not to apply to large passenger vehicles.
- **Parking and Traffic Appeals Service**
The Parking and Traffic Appeals Service states that whilst it is clear that the proposals would have a significant effect on the Road User Charging Appeals Service, it has no views to express at this stage.
- **Parliamentary Advisory Council for Transport Safety**
The Parliamentary Advisory Council for Transport Safety notes that there is no reference to the impact on road casualties and road safety. It is concerned that if those currently driving larger vehicles continue to do so, and only those currently driving smaller vehicles change their vehicles, the latter group will be exposed to a slightly higher risk of death if involved in an accident.
- **Vehicle Certification Agency**
The Vehicle Certification Agency has been involved in advising TfL on the technical aspects of vehicle emissions for the proposals and has no further comments to make.

18. Trade Associations

- **British Vehicle Rental and Leasing Association (BVRLA)**
The BVRLA does not support the proposals and has concerns they could increase congestion which would lead to a change in the low CO₂ discount and that this could adversely impact confidence and certainty of vehicle owners. It considers that, given the seriousness of the environmental issues of climate change, the matter should be reserved for central Government. It also considers the Congestion Charge should be based on distance travelled and recommends the Mayor consider a 100 per cent discount for rental and car club cars with CO₂ emissions of less than 165g/km.
- **Environmental Industries Commission**
The Environmental Industries Commission supports the proposal to introduce a discount for heavy-duty vehicles which meet Euro V standards and encourages TfL to consider extending the discount to Euro VI vehicles when the EU has agreed this standard.

- **LP Gas Association**

The LP Gas Association is concerned about the impact of the proposals on the LPG industry and LPG vehicle owners and suggests that LPG fuelled vans receive a discount of at least 50 per cent of the standard charge to reflect their improved air quality over conventional petrol or diesel and that TfL should consider EDC type 1 tests for retrofit LPG car conversions as evidence that CO₂ emissions fall below 120g/km. The Association offers to administer an LPG discount on behalf of TfL at its own cost.

- **Natural Gas Vehicle Association**

The Natural Gas Vehicle Association supports charges based on the level of CO₂ emissions and proposes that any vehicle which can show that by the use of renewable fuels its CO₂ emissions are below 120g/km should be exempt from charges. It also encourages the consideration of schemes to reduce traffic emissions affecting air quality.

- **Renewable Energy Association**

The Renewable Energy Association is concerned that by concentrating on CO₂ emissions the proposals do not address the emissions from transport which affect air quality. It proposes that vehicles using renewable fuels and flex fuel vehicles using renewable fuels should be exempt from the congestion charge.

- **Society of Motor Manufacturers and Traders**

The Society of Motor Manufacturers and Traders considers that the proposals do not represent an effective strategy to address the Mayor's road transport congestion, climate change and air quality objectives. Further, it risks weakening the congestion reduction impact of the current zone. The Mayor should be planning a scheme to fully address congestion and bring real air quality and climate change benefits to London. Vehicle manufacturers believe a combination of adequate signals for behavioural change, new technology and price can deliver the Mayor's objective. In addition, local fragmentation of low CO₂ strategies and local, inconsistent charging environment works against the objectives of reducing CO₂ emissions. It considers that the level of the higher charge is disproportionate to the level of vehicle emissions. Greater consideration and groundwork is required to determine the policy to deliver effective road transport direction on congestion, air quality and climate change for London.

19. Transport and Environment Representative Organisations

- **Alliance Against Urban 4x4s**

The Alliance Against Urban 4x4s said that it has previously campaigned to increase the Congestion Charge for cars in band G and fully supports the proposals, including the end of the Alternative Fuel Discount and the removal of the residents' discount for band G vehicles.

- **Campaign for Better Transport (formerly Transport 2000)**

The Campaign for Better Transport supports the proposals but is concerned that it will have an adverse impact on traffic levels and congestion because the number of vehicles in bands A and B will outweigh any reduction in band G vehicles. It calls for a review of these arrangements soon after their introduction. It raises concerns that the proposals are not expected nor designed to have any impact on air quality, and that they may encourage the use of diesel-engined cars.
- **Campaign for Clean Air in London**

The Campaign for Clean Air in London supports the principle of a 'polluter pays' charging scheme but would like to see the scheme expanded so that the price paid for driving is linked to the distance travelled and emissions created. It is concerned that the proposals do not incentivise the use of the cleanest HGVs and LGVs and do not discourage the use of diesel engines.
- **CTC**

CTC is supportive of any steps to reduce motorised traffic and increase cycling and walking, and welcomes the creation of the £25 charge. It appreciates the reasoning behind the £0 charge for band A and B vehicles, but suggests that the provision be kept under review to prevent it leading to a substantial increase in traffic. It suggests increasing the standard charge, extending charging hours, removing the exemption for taxis and minicabs and reconsidering the exemption for motorcycles.
- **Energy Saving Trust**

The Energy Saving Trust welcomes the proposals and endorses the proposal to amend the discount and higher charge should monitoring show that this is necessary in order to deliver CO₂ reductions and maintain decongestion benefits. It suggests that because the number of band B vehicles is set to increase, it would be better to offer a full discount only to band B cars with CO₂ emissions below 110g/km and consider a reduction for band B cars with emissions above this level.
- **Friends of Capital Transport**

The Friends of Capital Transport support the proposals in principle but seek assurance that there will not be an adverse impact on congestion levels and that the direct benefits of congestion charging to public transport will not be compromised.
- **Friends of the Earth**

Friends of the Earth supports the principle and introduction of emissions related congestion charging for London but has concerns that traffic, congestion and CO₂ emissions could increase and that the scheme would have little or no positive impact on air quality. Although TfL proposes to review the effects by 2010, it is concerned that a further revision may be needed. It also considers that all vehicles should pay some charge as this would send the message that although it is far preferable to drive low or zero carbon emitting cars, it is still to be discouraged, in line with the original intention of the scheme.

- **Greenpeace**
Greenpeace supports the proposals provided the changes that fulfil the scheme's original commitment to traffic reduction. It has concerns the 120g/km cut off for the low CO₂ discount is not ambitious enough and that a 100g/km limit would continue to support the scheme's congestion function and encourage a shift in car efficiency.
- **Living Streets**
Living Streets supports the proposals providing that the low CO₂ discount is dropped to ensure that there is no overall increase in the level of traffic circulating and that the promotion of good public spaces and walking in the capital continues.
- **NSCA (formerly the National Society for Clean Air and Environmental Protection)**
NSCA supports the concept of an emissions related scheme. However, it considers that the projected CO₂ savings from the scheme are small, which will give it very poor cost effectiveness. There is also a risk that the scheme could result in increased congestion. NSCA feels that the scheme should focus more on air quality, which is a serious problem in London. It is particularly concerned that the proposals will lead to a rise in diesel vehicles in central London. NSCA also feels that the commitment to review the scheme by 2010 undermines its long-term effectiveness as a tool for influencing personal transport behaviour and choice.

20. Utilities

- **Royal Mail**
Royal Mail is concerned that the alternative fuel discount is being removed and would like a 10 year guarantee from TfL that a discount would continue before investing in electric vehicles.