

**Planning & Transportation Department**

**Director: Carl Powell**

This matter is being dealt with by:

**Sean Dwyer, Transport Policy Team**

Direct Line: **(020) 7641 3326**

Fax no: **(020) 7641 3050**

Email: [sdwyer@westminster.gov.uk](mailto:sdwyer@westminster.gov.uk)

My ref: **pt/pol/sd/640.4**

Your ref:

Date: **16 January 2002**

Transport for London  
Congestion Charging Scheme Order  
Consultation  
Freepost LON17507  
London SW1H 0YZ

Dear Dr. Dix / Mr. Murray-Clark

## **Proposed Congestion Charging Scheme for Central London**

I am writing in response to the second round of consultation on the Congestion Charging Scheme Order.

The comments set out below relate only to the proposed changes to the scheme. Please note that the City Council's overall view, as set out in my letter of 19 October 2001 (copy attached), remains that the Mayor of London should withdraw the proposals or at least postpone them until such time as a further detailed study has been undertaken which demonstrates that the City Council's concerns have been overcome and the details of the methodology and results of the further studies have been made available.

I still look forward to receiving your response to the points outlined above and in response to the previous consultation, including a response to the Brett report, and in particular the alternative approach that is outlined within it.

Unless changes have been made which fully address the City Council's detailed concerns, which were outlined in my letter of 19 October and in Appendix 1 to it, you should consider that these previously expressed objections still remain.

### **The current proposals**

Whilst the City Council objects to the generality of the proposals, it nevertheless supports the revised detailed proposals that: -

- licensed minicabs are given the same concessions as taxis
- a 100% discount is extended to dual fuel vehicles registered with the Energy Savings Trust
- residents of the area bounded by Marylebone Road, Baker Street, York Street and Gloucester Place will be eligible for the 90% discount
- buses used by voluntary groups will receive a 100% discount

Westminster City Hall, 64 Victoria Street, London SW1E 6QP  
Main Switchboard 020 7641 6000 [www.westminster.gov.uk](http://www.westminster.gov.uk)

- the upper limit on the number of borough operational vehicles is being removed

However, the City Council objects to a number of the proposals as set out below.

- The 100% discount for Blue badge holders is being extended outside London – the City Council previously stated that it felt that “the scheme for allowing 100% discount to disabled blue badge holders resident in Greater London is inappropriate and will lead to widespread abuse”. The current scheme extends this proposal to areas outside London, and indeed to the whole of the EU, making it even more subject to abuse. It would be better to await the outcome of the Secretary of State’s review of the Blue Badge scheme before considering a widespread concession to Blue Badge holders. There are many existing genuinely qualified Blue Badge holders who are suffering as a result of the widespread abuse.

The current Blue/Orange badge parking scheme, which has been in existence for 30 years, recognises the special nature of travel and parking demand in central London by withholding the exemptions granted elsewhere. Your proposals would seriously undermine this well-established approach. The number of attractions means that unrestrained demand for travel by car will always outstrip supply. The onset of these additional concessions under congestion charging would mean that the incentive to obtain a fraudulent Blue badge would be much greater than at present when only limited parking concessions are available.

The City Council supports the development of the previously proposed Silver badge scheme, which Transport for London has abandoned. The reasons for its abandonment are unclear, but the City Council’s view is that the development of such a scheme, difficult though it might be, would be preferable to allowing a blanket exemption to anyone in the EU with a Blue badge.

- The 100% discount for buses is being extended to all buses with more than eight seats – the City Council does not feel that tourist coaches and sightseeing tours should receive a discount.
- The discount to voluntary groups extends only to buses and does not cover all vehicles used by such groups. There should also be a scheme available to allow carers, such as those who are taking friends or relatives who are unable to use public transport to hospital, to be exempt from the charge.
- Residents of the discount zone will be restricted to registering one vehicle at a time for the discount. By contrast, the City Council’s residents’ parking scheme allows residents to register two cars, but only allows them one permit with both registration numbers shown. They can therefore only keep one car on-street in the controlled area at any one time. Many residents take advantage of this to keep a second car outside London while retaining the freedom to bring either car to Westminster. In the City Council’s view it would be unfair to penalise residents further by removing this choice. It is suggested that a similar arrangement should be applied to the congestion charging scheme so that residents can register two cars, but your system should be capable of detecting whether both registered cars are in the zone at any one time and charges or penalty charges levied accordingly.

## **Supporting documentation**

The City Council is also concerned that the consultation documents contain only a passing mention of income. The supporting documentation for the previous consultation stated that the scheme is expected to raise some £200M per year (paragraph 50 of Document 10 of the pack, entitled "How the congestion charging scheme supports the Mayor's strategies for London"). The general public might be misled into thinking that this is still the case. The fact that the annual income is now projected to be some £130M (contained only in the first paragraph of Annex 2) is likely to constitute a very significant change in the public's eyes and should therefore have been highlighted much more prominently.

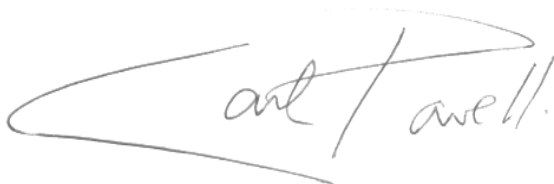
It is clear that the increase in the number of concessions given, and the reduction in the hours at which the scheme will operate, will both mean reductions in income compared with the previous proposals. However, the current documentation does not make it clear whether the latest income projection of £130M includes an allowance for this further reduction in income or whether further reductions are to come.

In the City Council's view, these omissions of key information in relation to income are in themselves sufficient to invalidate the consultation and might require a reference to the Audit Commission to ensure the public interest is being served. The Audit Commission might also wish to consider whether the very short timescale set for the introduction of congestion charging is likely to attract a premium from tenderers wishing to supply the various elements of the system.

It might also wish to consider whether the proposed charges are detrimental to the commercial viability of businesses operating in central London. The significant concessions now extended to the public sector (which the City Council generally supports) mean that the burden of traffic reduction will fall on the private sector to a greater degree than before. To achieve an overall traffic reduction of 10-15%, private sector trips will have to fall by an even greater percentage.

For many businesses, the use of public transport is not an alternative for the transport of bulky or high-security goods. In the light of the widespread new exemptions, there is a strong case for such business-related trips being exempt from the charges.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Carl Powell', enclosed within a large, loopy, hand-drawn oval shape.

CARL POWELL  
DIRECTOR OF PLANNING AND TRANSPORTATION