**Transport for London** 

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

**Report to the Mayor – Executive Summary** 

November 2008

# **Executive Summary**

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

## 1. Context and Purpose of the Consultation

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

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

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

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

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

# 2. The options presented in the consultation

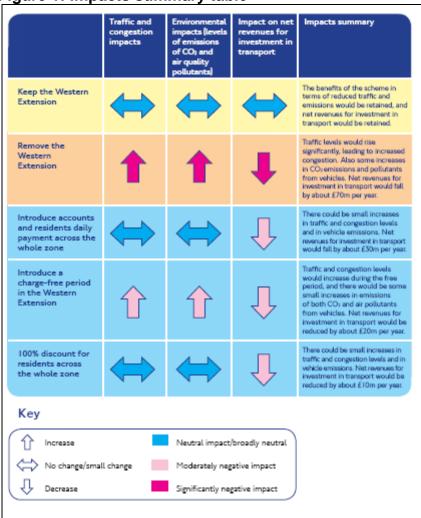
When the consultation was launched on 1 September, the Mayor said that he was keen to hear views on changing the Western Extension as well as keeping it as it is, or removing it. Accordingly, the public questionnaire contained within the information leaflet and available online presented a range of options: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

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

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

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

Figure 1: Impacts summary table



# 3. Description of the Consultation

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

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

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

#### Responses analysed by Accent (up to 7 October 2008)

Source Number received

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

# Responses analysed by TfL (received after 7 October 2008)

#### **Number received**

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

48 stakeholders responded to the consultation.

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

#### 4. The Western Extension in Context

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

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

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

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

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

# 5. Impacts of the Western Extension

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

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

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

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

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

# 6. Summary of Consultation Responses

## The Consultation and the Attitudinal Surveys

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

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

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

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

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

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

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

## Responses to the consultation options

#### Option 1 Keep the Western Extension as it is

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

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

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

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

#### Option 2 Remove the Western Extension

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

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

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

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

#### Option 3 Change the way that the scheme operates

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

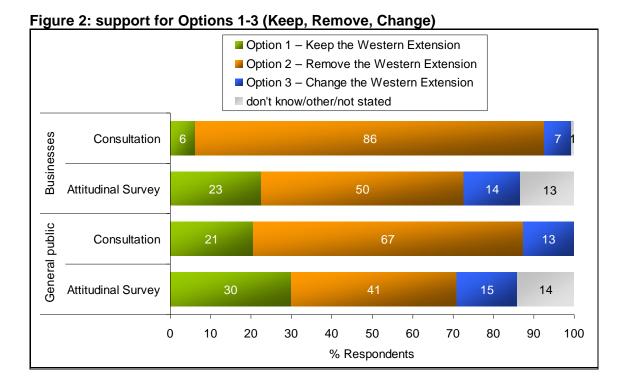
In the attitudinal surveys, 15% of Londoners and 14% of London businesses preferred this option. There was a fairly similar level of support for this option from residents in both the Western Extension and its buffer zones (18%) and the original charging zone and its buffer zones (16%).

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

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

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

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



# Analysis of stakeholder responses to the three main options

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

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

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

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

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

#### Stakeholders expressing support for removing the Western Extension (12)

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

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

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

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

AA

**London Councils** 

Lord Hunt

**RAC** Foundation

London Borough of Havering

**PATAS** 

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

Several stakeholders commented that the Congestion Charge was important as part of a package of measures to encourage people to make sustainable choices in transport. Many highlighted that the removal of the Western Extension would result in increased traffic levels and congestion. In turn this could lead to increased emissions of air pollutants and CO<sub>2</sub>. Others were concerned that the removal of the Western Extension would mean a significant and ongoing loss of revenues for investment in public transport.

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

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

## Options for changing the way that the scheme operates

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

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

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

#### Option 3a Introduce an account-based payment system

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

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

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

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

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

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

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

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

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

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

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

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

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

## 7. Recommendations and Next Steps

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

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

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

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

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

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

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

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

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

TfL has already begun tackling congestion through enhanced road and traffic management, and there is scope for this approach to be expanded, for example by re-phasing traffic lights to improve traffic flow. A number of schemes have also been put in place which will help to reduce the number and duration of road works. We would recommend that the application of these measures should be prioritised for implementation in the Western Extension area in anticipation that the scheme will be removed. Furthermore, with regard to emissions, a number of initiatives which improve air quality and reduce  $CO_2$  emissions from road transport are already in place. The continuing contribution of these initiatives – and what more can be done – needs to be considered further, in the anticipation of the scheme being removed, and as part of the development of the Transport Strategy and the Mayor's other Strategies.

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

As well as a revision of the Transport Strategy, removal of the Western Extension will also require a formal variation to the Congestion Charging Scheme Order. These both involve statutory procedures, including public consultation which cannot be pre-judged. In practical terms, the Western Extension could not be removed until spring 2010 at the earliest. This timescale reflects the need for these statutory procedures. This will also allow time to address the issues as set out above. In addition, this timescale takes account of the transfer of Congestion Charging scheme operations to a new service provider in order to guarantee that any changes would be made in the most economical and efficient way and to ensure the greatest value for Londoners' money.

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

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

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