Transport Committee investigation on The Future of Road User Charging:

Written evidence from organisations

Updated 19/04/2024

In 2022-23 the London Assembly Transport Committee carried out an investigation into the future of road user charging in London. The Committee conducted a Call for Evidence as part of this investigation, which ran from 9 February 2023 to 10 March 2023. The Committee received over 3,300 responses to its Call for Evidence from organisations and individuals and would like to thank those who took the time to respond.

The Committee aims to publish the evidence it receives as part of its investigations, including responses to calls for evidence. The large majority of responses are published here alongside the Committee's report. The Committee has taken a careful approach to categorising responses for publication: it has not included responses that were exact duplicates, that asked to remain confidential, that were not directly relevant to the subject of the investigation, or that were deemed abusive or contained offensive or potentially distressing references. In addition, redactions have been made where data protection considerations apply. However, all submissions, whether published or not, have been read carefully and were taken into account in putting together the report.

Responses were all given a reference number, and responses from individuals that are published have been anonymised and are referred to via the reference number. Published responses do not appear in the order of the reference numbers, and not all reference numbers are published due to them being duplicates, template responses, or for the other reasons defined above.

Due to the volume of responses received the evidence from individuals has been split into separate documents for publication for administration purposes. The order each piece of written evidence appears is random and responses from individuals have not been grouped together in any substantive way. Submissions from organisations have also been published alongside the response reference number and the organisation's name.

Some personally identifiable information has been redacted for publication.

Views expressed in the written evidence published here represent the opinions of the respondents rather than those of the London Assembly.

Response from: Caura

Reference	RUC2787

Dear Sir / Madam,

Please see our responses below:

1. The current road user charging systems in London require reform because they are not interoperable with parking, other charges and tolls in the UK. Drivers need a plethora of apps and accounts to pay
2. No comment
3. No comment
4. No comment
5. Smartphone apps already support location based parking and such services as Uber - a dedicated on board unit is no longer needed
6. No Comment
7. Systems should be set up at city level but with interoperable payment nationally – eg so drivers can pay for Dart Charge, Lower Thames, Blackwall, Silvertown, ULEZ and M6toll with one account. Caura.com is an app I have set up to provide this but institutional barriers to open payment are stifling progress in making it easy to pay.
    - You probably have a folder on your phone for different parking apps – we must avoid a similar problem for road charging
    - We would like to discuss with the Mayor of London's office and TfL on how we can deliver better interoperability and accessibility of services
8. No comment
9. No comment
10. Yes, as the population is used to charging
11. No comment
12. No comment
13. The US has four states with distance based charging for electric vehicles which are successful. Most EU Countries have distance based truck charging. These two types of vehicles are low hanging fruit for charging

Response from: Elmbridge Borough Council

Reference	RUC2735

London Assembly Transport Committee
City Hall
Kamal Chunchie Way
London
E16 1ZE

Dear London Assembly Transport Committee,

On behalf of Elmbridge Borough Council, we are providing you with our views on some of your key questions regarding the future of smart road user charging in London and the practical issues around the potential introduction of smarter road user charging in London.

Elmbridge is located in the North of Surrey and is adjacent to the London Borough of Richmond upon Thames and the Royal Borough of Kingston upon Thames. We are therefore likely to be significantly impacted by the introduction of Ultra Low Emissions Zone (ULEZ) London wide in August 2023 and any future road charging schemes.

At a meeting of Elmbridge Borough Council on Wednesday 7 December 2022, Councillors reconfirmed their commitment to improving air quality in the borough while also agreeing to act on behalf of the Elmbridge community, to work to improve the implementation of the extension of ULEZ being introduced in August 2023. A copy of the Notice of Motions agreed by our Full Council is attached at Appendix 1 and 2 of this letter.

We recognise the aims of road charging schemes such as ULEZ and how they align closely with our Air Quality Action Plan (AQAP). We know the communities of Elmbridge are linked with those of Greater London. We also know our residents travel to hospitals, businesses and other services in Greater London. It is our view that road charging schemes will have a disproportionate impact on Elmbridge's small businesses and our residents on lower incomes i.e., those already hit the hardest by the rising cost-of-living. It is also the case that our community is often more reliant on their cars and do not have access to the Tube or bus networks of Greater London as an alternative travel option. We are also aware of further negative consequences of road charging given our proximity to the border, such as but not limited to:

- Increased use of our countryside and greenspaces car parks which may lead to controlled parking zones
- Increased on-street parking which may lead to controlled parking zones
- A lack of affordable and suitable public transport from Elmbridge to Greater London
- A change in road charging vehicle criteria in future years

- Residents may be discouraged to attend healthcare appointments in London which may lead to an increase in vulnerability and greater pressure on health care provision down the line as conditions are exacerbated
- Scrappage schemes focusing on 'Londoners' only
- Elmbridge businesses may need to upgrade fleet at their own expense to operate in the proposed ULEZ area
- Businesses in Elmbridge may struggle to attract a workforce from the London area due to unaffordable and poor public transport links
- Private hire and taxi firms may need to upgrade their vehicles at their own expense to operate in road charging areas.

Elmbridge would like to see the following before road charging is introduced:

- A more in-depth study of air quality monitoring and the impacts of road charging schemes such as ULEZ
- Reassurances that public transport close to Elmbridge will be vastly improved and appropriately funded to ensure the value of road charging schemes such as ULEZ is achieved.
- Clarity on proposals regarding an exemption for Elmbridge residents attending healthcare appointments in road charging areas, e.g., Kingston hospital.
- For TfL to lobby for a national scrappage scheme

Please see the below responses to a few of the key questions to be considered by the Committee:

Key questions:

1. **Do the current road user charging systems in London require reform?**

We recognise the aims of road charging schemes such as ULEZ and how they align closely with our Air Quality Action Plan (AQAP). We are committed to improving air quality in Elmbridge and welcome greater working together between TfL, Surrey County Council and ourselves to provide mitigation.

2. **How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?**

As stated in our letter to the Mayor of London on 22 December 2022, we would expect TfL to maintain the continued range of discounts for people entering road charging scheme areas such as NHS patient reimbursement, minibuses used for community transport, charities, schools etc. It should also include discounts for those seeking work in London.

3. **What strategies and targets could smarter road user charging support?**

We urge TfL to work with us and our colleagues at Surrey County Council to improve local public transport and cycle ways and other sustainable travel initiatives such as

the expansion of Zone 6 beyond Hampton Court and Thames Ditton to include stations such as Esher, Walton-on-Thames, Hersham, Hinchley Wood, Cobham, Oxshott, Claygate, Weybridge and others.

4. **What technology could be used to support smarter road user charging?**

Greater environmental air quality analysis on the borders of London is required. Afterall, in the same way that air doesn't acknowledge administrative boundaries, neither do people's lives.

5. **How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?**

We urge TfL to work with us and our colleagues at Surrey County Council to improve local public transport and cycle ways and other sustainable travel initiatives such as the expansion of Zone 6 beyond Hampton Court and Thames Ditton to include stations such as Esher, Walton-on-Thames, Hersham, Hinchley Wood, Cobham, Oxshott, Claygate, Weybridge and others.

6. **If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?**

We think that it is hugely important than any net revenue generated by TfL such as ULEZ should be reinvested to provide better suitable, appropriate and affordable public transport links between Elmbridge and the London ULEZ to better mitigate its impact. Afterall, in the same way that air doesn't acknowledge administrative boundaries, neither do people's lives.

7. **What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?**

It is our view that road charging schemes will have a disproportionate impact on Elmbridge's small businesses and our residents on lower incomes i.e., those already hit the hardest by the rising cost-of-living. It is also the case that our community is often more reliant on their cars and does not have access to the Tube or bus networks of Greater London as an alternative travel option.

As stated in our letter to the Mayor of London on 22 December 2022, we would expect TfL to maintain the continued range of discounts for people entering road charging schemes such as NHS patient reimbursement, minibuses used for community transport, charities, schools etc. It should also include discounts for those seeking work in London.

8. **Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?**

In our view the implementation for road charging schemes close to our border is too soon, as authorities on the border of the proposed expansion have not had enough time to consider the impacts of road charging schemes such as ULEZ, nor have TfL provided any modelling on air quality or traffic flow. Such analysis will take time and we would hope for a delay in implementing further road charging schemes such as the ULEZ expansion to allow for this to be completed.

We believe that the right thing for the Mayor of London to do is to pause road charging schemes such as ULEZ while we work together to discuss how those concerns might better be met.

We hope that this feedback helps to influence your recommendations.

Appendix 1: Council meeting - 7 December 2022

Elmbridge Borough Council's Agreed Notice of Motion regarding proposed Ultra Low Emissions Zone

This Council has a commitment to improving air quality in Elmbridge as detailed in our Air Quality Action Plan; this aims to reduce damaging emissions in the Borough as quickly as practically possible. While we have therefore welcomed the introduction of measures to improve air quality in Central London, we have concerns about the recent announcement by the Mayor of London to expand the Ultra-Low Emissions Zone (ULEZ) to all London boroughs for the following reasons:

- there is consistent and cross-party support for this Council to reduce its emissions and impact on the environment as quickly as practically possible;

- the communities of Elmbridge are inextricably linked with key points of infrastructure (businesses, hospitals, shops, services, etc.) within Greater London;

- the ULEZ £12.50 daily charge, and potential large fines for non-compliant vehicles, will have a disproportionate effect on small businesses and those on lower incomes already hit hardest by the cost-of-living crisis and inflation;

- the evidence and economic modelling of the impact is wrongly focussed on the impact only on Londoners and revenues for the Mayor of London, ignoring the impact on Elmbridge residents who do not have access to the alternative means of transport of tube and bus networks within the Greater London area;

- tax payers' money set aside for the Mayor to spend on reducing air pollution would be better spent on public transport, cycle ways, and other initiatives rather than a network of ULEZ cameras that penalise lower income households and those that must travel for work;

- to expresses support to expand Zone 6 beyond Hampton Court and Thames Ditton to include stations such as Esher, Walton, Hersham, Hinchley Wood, Cobham, Oxshott, Claygate, Weybridge and others; and therefore:

This Council therefore resolves that the Leader and Chief Executive write to the Mayor of London to express our opposition to the expansion of ULEZ without engaging with both EBC and Surrey County Council (as our public transport provider) to agree mitigation measures against the short-term impacts of the expansion of the ULEZ.

Appendix 2: Council meeting – 22 February 2023

Motion for Council – 22 February 2023

Ultra-Low Emission Zone (ULEZ)

'This Council notes the motion proposed by Cllr Cope and Cllr Burley that gained cross party support on the 7 December 2022 against the ULEZ proposals and supporting the extension of Zone 6 to all the Borough.

Until mitigation of this Council's concerns including the lack of evidence ULEZ reduces pollution; the negative impact on local businesses; and cost of living increase for residents takes place, we further agree, subject to statutory and legal obligations:

- to match the approach taken by Surrey County Council to withhold use or access to all Council owned or controlled land for the use of infrastructure or signage associated with the expansion of ULEZ; and

- no Council officer or financial resource (including assets) will be made available to facilitate ULEZ expansion without seeking agreement of Full Council

until such time as mitigations are agreed between this Council, Surrey County Council, and the Mayor of London.

This Council asks officers to bring forward proposals at the earliest opportunity to Full Council to mitigate the impact of the imminent ULEZ expansion on local residents and businesses, including:

- the inclusion off an additional pilot to the Elmbridge car parking strategy 2022-2030 of 30 minutes free short stay parking to establish the benefits this offers to the high street and local businesses through more local shopping, thereby reducing the need to travel into the ULEZ zone; and

- and other measure which officers consider may mitigate the impact of ULEZ on residents.

Response from: Centre for Policy Studies

Reference	RUC2773

CPS response to the London Assembly Transport Committee Call for Evidence: The future of smart road user charging February 2023

2. Do the current road user charging systems in London require reform?

While in many ways London is a global leader in road user charging, it can and should look to make its policies more efficient, targeted, and simpler for citizens to understand.

More specifically, we would support expanded eligibility for the ULEZ scrappage scheme (beyond those on certain benefits), for example with an income threshold of £25,000-30,000. This would ensure that financial hardship to accomplish London's clean air goals is not placed on those for whom a new vehicle would represent a substantial financial outlay. Practically this could be accomplished by hypothecating revenue raised from charging to the scrappage scheme, rather than distributing it more widely across the transport network.

We do not support expanding the clean air charge to cover all vehicles (as has been reported in the press) – the Euro IV / VI standards are critical to the clean air raison d'etre of ULEZ. While $PMI_{2.5}$ is indeed caused by all vehicles (rather than older ones), the current generation of clean air policies is focused on NO_2 and should remain that way. Otherwise citizens may view this as 'pulling the rug out from under them' and support for the policy could slip away. Rather if the goal is modal shift, more sophisticated forms of congestion charging should be used.

We discuss our thoughts on more advanced congestion pricing below.

3. How might smarter road user charging differ from the current daily charges for driving applied in London?

The principal focus of smarter road user charging should be on congestion. While the Congestion Charge has served London well, it is relatively low technology and blunt and could be made far more targeted and efficient. Particularly the congestion charge could be made much 'smarter', modelled on Singapore's ERP system (see response to question 13 for further details). Rather than a single daily charge, charges could vary based on location and time of day, enabling far more targeted measures and more efficient usage of the roads. This should lead to higher speeds for motorists, with the associated economic and social benefits.

Yet London could go further than Singapore and introduce a 'dynamic' system. Imagine getting into your car and inputting your destination (to say Google Maps) – the software would give you a choice of routes, with different price levels. The quickest route might shave off 15 minutes off your journey but would charge an extra £5, whereas more indirect routes would save you money. The beauty of such a system is that charges could be varied in real time to respond to

traffic conditions, shifting demand to match supply and enabling far more efficient and speedier utilisation of the roads. Such systems are technologically relatively achievable given the near ubiquity of smartphones and associated location-tracking apps – what is needed is the political will and public acceptance.

4. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

While there will always be exceptions such as emergency vehicles, as a general principle congestion charging should not vary based on the type of journey. For the policy to be effective the coverage needs to be relatively universal, allowing those with the ability to shift their journeys to alternate times of day / week or onto public transport or active travel to do so. Preferential rates for specific journey types will undermine this rationale and make the system less effective. There is also the political dimension, namely that by giving preferential rates to some groups, others may demand the same and deciding where to draw the line can be difficult. Political support may also be undermined if the policy is perceived to be biased towards certain types of journeys. Finally there is the practical issue of gathering data on the type of journey, as well as the possibility of manipulating the system to gain preferential rates.

5. What strategies and targets could smarter road user charging support?

The main focus of smarter road user charging should be on reducing congestion. Hence any targets or KPIs should focus on higher speeds or increased throughput on specific roads – see Question 13 below for an example of how Singapore does this.

6. What technology could be used to support smarter road user charging?

While the current system of ANPR cameras has served London well, they are bulky and by definition effective only at certain points. Ditto for Singapore's overhead gantries. Ideally any next generation system of congestion charging would utilise location tracking, obviating the need for physical infrastructure and allowing for far more targeted charging systems. Many new cars today already have GPS systems built in, while tracking devices can be obtained for £20 with GPS capabilities, for example that plug into the vehicle's cigarette lighter socket. Alternatively there is of course the option of a smartphone app – many such apps already exist today in the private sector to help users track their mileage for tax purposes. While privacy has historically been a key concern of many voters, this could potentially be overcome with data

anonymisation and strict data protection, and of course the more general shift in attitudes given the smartphone revolution.

7. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

Smarter congestion pricing could enable far more efficient utilisation of the roads than we have today, leading to significant reductions in traffic. At the most ambitious end of the spectrum a dynamic system could vary charges in real time depending on traffic conditions, giving users a choice of route options for any given journey with varying durations and charges. Even a relatively lower-technology option such as Singapore's ERP allows the government to modify the charges to achieve desired speed levels on a given road, far beyond what London's congestion charge can do today.

A smarter system of congestion pricing could also encourage further modal shift, helping to meet net zero targets. However this should be balanced carefully against the viability of public transportation options (for example in outer London) as well as the need for means-testing to avoid placing this burden primarily on the poor.

We believe ULEZ is an important tool to tackle air pollution in the capital and our thoughts on reform are set out in question 1.

8. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

Clean air schemes like ULEZ and congestion charging policies are best set up at a city or regional level – these are primarily local problems best solved by local leaders. However it is important to distinguish these from fuel duty and VED, which are at the national level and should remain there. We are strong supporters of per mile charging as a replacement for fuel duty and VED, but this is an issue for the national government not local authorities. TfL should not seek to duplicate charges for the roads themselves, as opposed to the local externalities caused by driving (eg air pollution and congestion).

9. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

Discussed above.

10. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

We discuss expanding the ULEZ scrappage scheme in response to question 1, which should be a priority. While the Congestion Charge does not currently differentiate based on income, there is certainly a principled argument for doing so. Namely that the current £15 charge will affect higher earners quite differently than lower earners, and the point is not revenue raising but behavioural change. Thus the charge could be varied with income levels in order to deliver the same deterrent effect without disproportionately (as a share of their income) burdening poorer drivers. Greater Cambridge has proposed to do just this in their congestion charging scheme (with tapered discounts for those on low incomes), administered via an application process. However we caution against giving exemptions (or even discounts) to too many individual groups (eg those who need to drive for work) given the possibilities of rent-seeking, distorted incentives and the difficulty of drawing the line effectively.

11. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

No, as this would introduce a host of complexity (such as the refunding of fuel duty and VED) to Londoners without much benefit to the national government. Specific groups such as HGV drivers or those who already track their work mileage for tax purposes are far better test users than a geographic area such as London.

12. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

It is slightly unclear what this question is referring to. If it speaks to a national per mile charging scheme (eg that replaces fuel duty and VED), it is possible Londoners would pay more than they do today given the plethora of public transportation options in the capital, particularly in inner London. One of the arguments often heard from rural drivers is that they have no option but to drive, whereas those in larger cities have access to a substantial public transportation network, and many choose to drive by choice. Thus a per mile charging scheme could seek to vary charges for different users (for example through a system of geographically-based free mileage allowances), and thus those in London could end up paying more than they do today.

Higher rates would also create a subtle nudge to reduce car usage, accomplishing many of the CO2 and congestion goals the Mayor has advocated for. However this need not be the case – one could also envision a system that is geographically-neutral (in the same way that fuel duty is), ensuring that all drivers do not pay more than they do today. In any event, this is a question for the national government rather than local authorities.

However if this question speaks to a more advanced form of congestion charging, then the effect should be varied based on area and time of day and hence should be not be uniform among all Londoners.

13. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

14. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

Singapore has been a world leader in road user charging, having introduced the Electronic Road Pricing (ERP) system in 1998. Singapore's ERP scheme aims to control traffic speed through the Central Business District (the densest bit of downtown Singapore) via a system of gantries set up at strategic points. All vehicles are required to have an onboard unit installed that charges drivers automatically as they pass through the relevant gantry. In contrast to London and other more basic systems, which have a single charge to drive into a defined zone, in Singapore each gantry is associated with an individual variable charge. These charges are priced in 30-minute minimum increments, which vary across the day – higher at rush hour and lower in the middle of the day and at night.

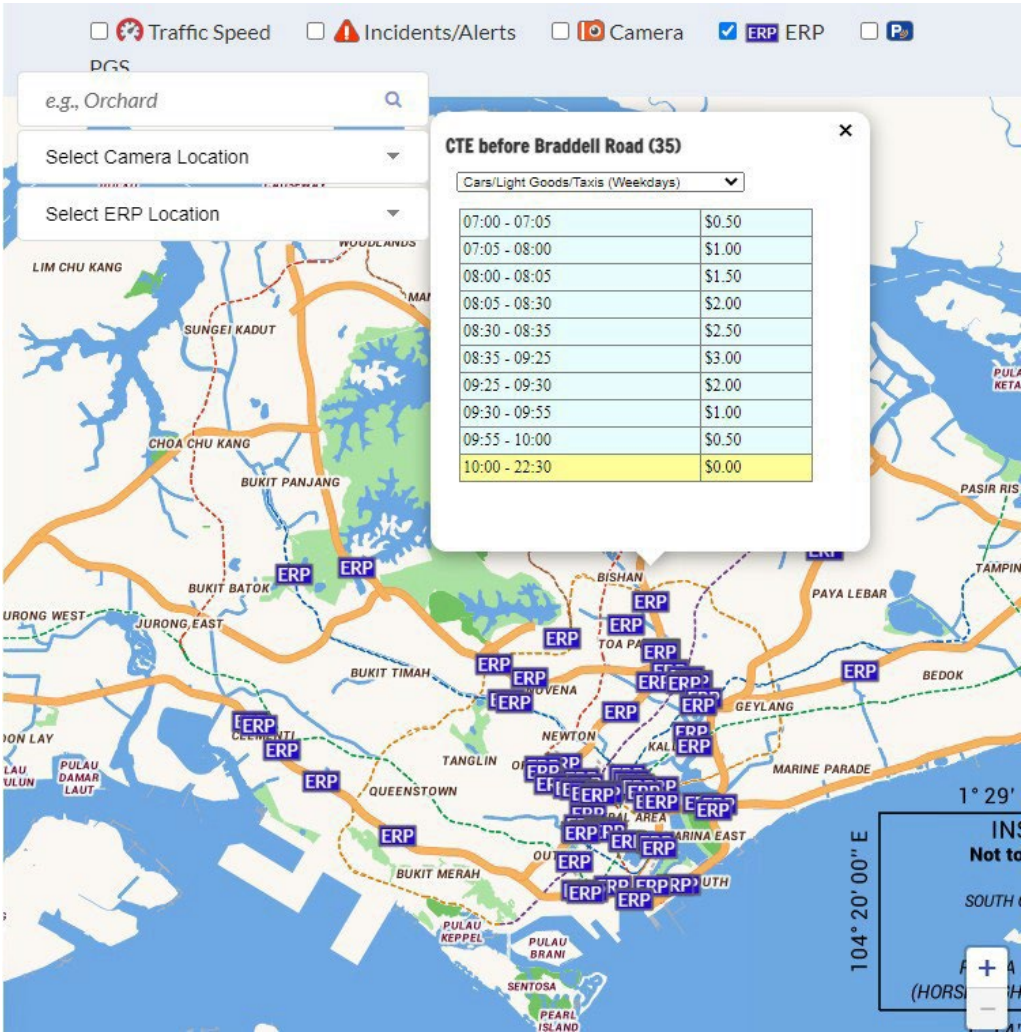
The Singaporean government explicitly sets an optimal traffic speed for each road (45–65 km/h on expressways and 20–30 km/h on arterial roads). At each location, daily traffic volumes and speeds are monitored, and charges are reviewed every few months to ensure that desired speeds are being achieved. If traffic speeds rise above the optimal level at any given point the charge is decreased, and vice versa.

An interactive map on the government website displays the charges in any given location (see below). Given the predictability of the charges over a several month period, drivers are able to modify their behaviour accordingly and hence speeds can be altered effectively.

Yet Singapore is not resting on its laurels. Despite leading the world in congestion pricing, the system was first introduced in 1998 and hence relies on relatively outdated technology

(overhead gantries) that are expensive to maintain. The government will be introducing a new system, dubbed ‘ERP2’, which will take advantage of GPS technology to enable distance-based road pricing. As the government describes it, “this will be more equitable than the current system, which charges all motorists the same amount as long as they pass a gantry, regardless of the distance they travel on the congested road.”

Example of ERP pricing in Singapore



Response from: Jacobs

Reference	RUC2810

Jacobs

Memorandum on the future of smart road user charging

Submission to London Assembly Transport Committee

March 2023

Introduction

1. This submission sets out our views on the future of smart road user charging in the context of London.

2. It briefly describes our experience of supporting the development and implementation of road user charging schemes in the UK and overseas and answers the Transport Committee's questions based on our experience and expertise.

Jacobs

3. Jacobs is a global technical and professional services leader, employing over 60,000 people worldwide. In the UK, we employ nearly 11,000 staff, with our European flagship office in central London and with a number of other client-based offices in the capital. We are helping to tackle some of the UK's most complex challenges to make the future better – supporting projects with outcomes that safeguard the environment, and improve our security, social equity, resilience and productivity.

4. For over 25 years, we have advised Transport for London on the development and evolution of London's Congestion Charging Scheme. This has included:
   - The definition and design of the original Congestion Charge scheme;
   - The planning, implementation and removal of the Western Extension;
   - Advising on the possible extension to "remote zones" including Heathrow Airport;
   - Advising on changing the technology from the current ANPR system to a GPS distance-based charge; and
   - Supporting the development of the Ultra Low Emission Zone from its original proposals.

5. We have or are advising: New York on the implementation of its congestion charging scheme, which is to be introduced shortly; a wide range of US Departments of Transportation on trials of State wide mileage based road user charging schemes; and Qatar on the potential for road user charging. We have also advised authorities in; Melbourne, Singapore, Hong Kong and Istanbul on road user charging, as well as a number of cities in the UK on the possible role of charging to meet their low emission

zone targets.

6. In 2017, with Volterra, we were shortlisted for the Wolfson Economics Prize for our proposal on a UK wide road user charging scheme on which this memorandum is heavily based[1]. This led us to being invited to the Climate Assembly UK to act as an advocate putting forward the case as to "How surface transport could be decarbonised via economic incentives"[2]. In their final report Assembly members recorded 56% strongly agreeing or agreeing to charging to use the roads, compared to 39% who strongly disagreed or disagreed with the proposal. We submitted evidence to the recent House of Commons Transport Select Committee on road user charging and its report widely quoted our evidence[3]. The Chancellor of the Exchequer in his response stated that "the government does not currently have plans to consider road pricing"[4]. This provides an opportunity for London to develop its own road user charging plans which meet the specific needs of the capital.

Response to the Committee's Specific Questions

1. **Do the current road user charging systems in London require reform?**

7. London presently has a number of road user charging schemes in place each with different objectives. The Congestion Charge addresses congestion in central London at times when that congestion is most acute; the Low Emission Zone covers almost the whole of Greater London and aims to discourage the use of the most polluting goods vehicles, buses and coaches and operates 24 hours a day, 365 days a year; and the Ultra Low Emission Zone (ULEZ), which will be extended in August to cover most of Greater London, covers all vehicle types 24 hours a day, 364 days a year and aims to improve London's air quality. In due course, a charging regime will be introduced for the use of Blackwall tunnel and the new Silvertown tunnel to pay for the construction of the latter.

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1 https://www.jacobs.com/projects/pricing-for-prosperity-solution

2 Transcript and video of the presentation are at https://www.climateassembly.uk/about/meetings/weekend-2/john-siraut-jacobs-how-surface-transport-could-be-decarbonised-economic-incentives/index.html.]

3 Road pricing Fourth Report of Session 2021-22 https://committees.parliament.uk/publications/8754/documents/88692/default/

4 https://committees.parliament.uk/publications/34225/documents/188339/default/

8. The present charging systems are reasonably straightforward to understand for users. However, they are binary in their operation, motorists either pay a significant charge or nothing, even though in the latter case they may be adding to high levels of congestion or pollution. For example, there are a number of modern high performance cars that meet present ULEZ standards despite having a higher level of NOx (mg/km) emissions than older non-compliant vehicles. Whilst high levels of congestion are prevalent across London and not just in the present Congestion Charge zone. The addition of charging for the use of Silvertown and Blackwall tunnels also risks confusing motorists. A survey of drivers[5] found that the majority thought the standard congestion charge symbol (as shown in figure 1) used at the Dartford Crossings as well as for London's Congestion Charge solely related to the latter. This has led to some motorists receiving penalty charge notices for not paying for the use of Dartford as they thought their payment of London's Congestion Charge that day also covered their journey at Dartford.

Figure 1: Standard congestion charge symbol

9. London does not benefit from the devolution of vehicle excise duty revenue which means roads in London are often considered as a liability to local authorities rather than an asset that generates revenue. While TfL's Strategic Road Network is generally in a good state of repair there are many oft quoted examples of major highway structures that need considerable refurbishment spending on them and the condition of the local road network is very variable across the capital.

[5] https://www.kentonline.co.uk/dartford/news/dart-charge-signs-confuse-millions-41861/

10. A fully integrated charging system that links revenue to the use of the asset, taking

into account locations with high levels of congestion and the emissions of specific vehicle types would be more effective in achieving a well maintained road network, improving air quality and supporting economic growth by reducing congestion across the whole of Greater London. There is also an opportunity, through updated use of technology, to reduce the high cost of operating the present charging systems relative to the level of revenue they generate.

2. **How might smarter road user charging differ from the current daily charges for driving applied in London?**

11. Smarter road user charging can better reflect the impact that drivers have on overall congestion and emissions in different parts of London and at different times of day. Charges could be based on distance driven, location, type of road used, the vehicle's emissions standards, weight and / or time of day. Hence charges can be better used to manage traffic flows by encouraging people, as was used at the time of the Olympics, to reduce, retime, remode or reroute. Thereby, speeding up journeys for buses, freight and those who need to continue to drive while improving air quality. And, by providing a revenue stream related to the use of the road network, this potentially enables improvements in its condition.

12. Rather than being the present blunt instrument of a fixed £15 (congestion) or £12.50 (ULEZ) charge, in the case of cars and vans, it can be a laser sharp tool to achieve the desired outcome(s) across the whole of the capital.

13. A potential outcome could be a mileage charge which would vary, depending on the values attributed to each of the following three elements which could make up the total charge:
    - a road maintenance and operating charge;
    - a mitigation charge; and
    - a congestion charge.

Maintenance and operating charge

14. This would be the only element that all motorists automatically pay whenever they

drive. The revenue raised would go to the highway authority whose roads they have used and which are chargeable. The cost, could therefore, vary slightly by type of road and each highway authority based on the actual cost of maintaining its road network. There could be variations in charges between cars, LGVs, HGVs and bus/coaches. Heavier vehicles paying higher rates, proportional to the damage (wear and tear) they cause to road assets.

Mitigation charge

15. Whether motorists have to pay this element of the charge would depend on how environmentally efficient and quiet their vehicle is. This cost could also vary by location, being highest in areas with poor air quality and where traffic is intrusive, such as in historic centres and near schools and hospitals. Less polluting vehicles would pay less. This element of the charge would diminish over time as vehicles become cleaner and quieter, both with advances in technology and the change in behaviour that the charge would lead to.

Congestion charge

16. Where congestion does occur, that is, there is a noticeable reduction in speed from the free flow average, then a congestion charge could be levied. This charge could be set at a level to either achieve free flow speeds or, where traffic volumes are too great, to achieve a target journey time. Hence this charge could vary by time of day, day of the week and section of road.

17. The advantage of smarter charging is that it can be varied to meet any particular transport objective.

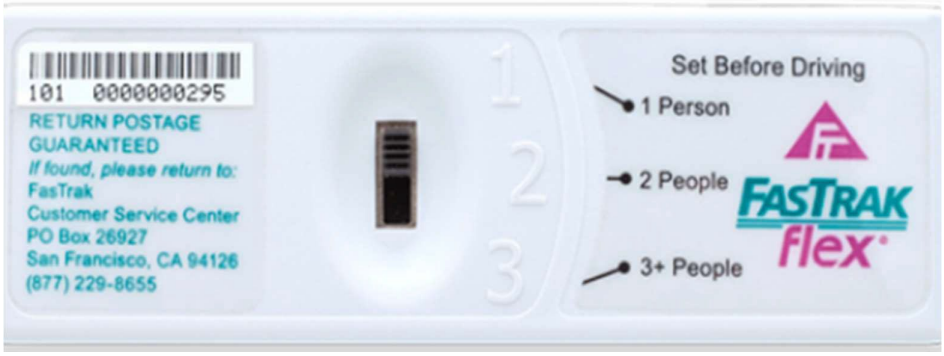
3. **How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?**

18. Differential charges based on journey purpose are incredibly difficult to implement and enforce. Refunds for some essential workers were put in place in relation to the Congestion Charge during the COVID pandemic but take up was variable. While the abuse of Blue Badges is widely documented. In theory it is possible for vehicles to be

pre-registered and made exempt or offered a discount rate if the user meets certain criteria. For example, a community nurse could register their vehicle and be exempt from charges during their normal working hours on the basis of confirmation from their employer. However, this can become administratively burdensome where working times can frequently vary as well as being open to abuse.

19. An approach based on user honesty with severe penalties for its misuse that is presently in place in parts of the USA is a tag-based system that can be switched on/off when a person is making a journey for which an exemption applies. The example shown in figure 2 is to obtain a high occupancy vehicle discount on a charged road. The driver sets the tag to the appropriate number of people being carried before commencing their journey. While it would be feasible to operate a similar system for particular journey types, comprehensive enforcement would be difficult to achieve.

Figure 2: A Bay Area FasTrak toll tag for a high occupancy vehicle discount/exemption



4. **What strategies and targets could smarter road user charging support?**

20. Smarter charging can be used to achieve a wide range of transport and environmental objectives. From reducing congestion and its related environmental impact, discouraging drivers especially HGVs using roads near schools at the start and end of the school day, to supporting free flowing traffic on key routes, and discouraging the use of certain vehicles, eg high performance or high emission vehicles in certain locations or times of day. It can help prevent rat-running and nudge vehicles away

from sensitive environmental locations.

21. In essence smarter road user charging can support many transport and related economic objectives, from encouraging take up of low emission vehicles to prioritising the movement of commercial vehicles, and maintaining a high-quality road network to making the most efficient use of a constrained resource.

22. A proportion of the monies raised could also be fed back into local communities that suffer from the negative externalities of the road network to be spent on either addressing the problems they cause, eg noise barriers, triple glazing, additional tree planting or other activities that would benefit those communities.

5. What technology could be used to support smarter road user charging?

23. The ideal approach would be to use existing in-vehicle telematics and require those older vehicles that do not have the built-in capability to install the appropriate equipment, similar to that used by insurance companies that offer pay-as-you-drive insurance (which is used by around 16m motorists in Europe[6] of whom around 1.3m are in the UK.)

24. This would enable the full benefits of smarter road user charging to be achieved. On-board devices to track and charge HGVs are common in many European countries, figure 3, so the technology is tried and tested.

[6] https://www.globenewswire.com/en/news-release/2022/04/28/2431047/28124/en/Europe-and-North-America-Insurance-Telematics-Market-Report-2022-2025-Mobility-Trends-Provide-New-Opportunities-For-Telematics-Based-Insurance.html

Figure 3: On-board devices used in Europe for HGV road user charging

25. A road user charging scheme introduced under the Transport Act 2000 can require the requisite equipment to be carried or fitted in a vehicle to enable it to be charged so the use of telematics for a London road user charging scheme is feasible. Ensuring all vehicles have the right equipment and have it switched on would require, at least at the start of the scheme a considerable degree of education and enforcement.

26. If a charging scheme was to be more limited in nature then the use of tag and beacons (RFID) to enable free flow charging – as at the Dartford Crossing and Singapore's road charging system and to be used for New York's charging system – would be an alternative solution. TfL's SRN network carries about 30% of London's traffic so a simpler charging scheme just on its network could still cover a significant proportion of London's traffic. Charges could still vary by time of day, type of vehicle and emission standards.

27. Road user charging in the USA tends to be a mileage charge which uses odometer readings. These readings are presently captured by in-vehicle telematics or a device that plugs into the vehicle's OBD-II port and transmits data to the account managers operating the systems. Consideration is being given to using manual readings at annual vehicle safety inspections. The US systems are presently small scale in operation applying mainly to electric vehicles as an alternative to an annual charge similar to the UK's vehicle excise duty. Determining where a vehicles' miles were undertaken would be very difficult for a London-only based scheme.

Future alternatives and options could include exploring Global Navigation Satellite Systems (GNSS). An emerging technology that uses the vehicle's position data to measure the use of the road in order to determine the charge.

28. Mobile communications (GSM and smartphones) charging systems are still in an embryonic stage but have significant potential going forward.

6. **How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?**

29. As outlined in the response to question 4, smarter road user charging can target any particular transport related objective. Higher charges in congested areas, on more polluting vehicles and in more sensitive areas can nudge drivers and businesses to change their behaviours. On days of high pollution or localised congestion related to major events then charging rates can be varied to further encourage behaviour change. If a proportion of London's road user charging revenues were allocated to its highway authorities in proportion to the volume of traffic handled on their roads it also provides an opportunity to improve and maintain the condition of the road network to the benefit of all road users.

30. Road user charging when introduced has had an immediate impact on reducing traffic volumes and emissions in London and elsewhere. The advantage of a smarter road user charging system is that it could more accurately target particular congestion or pollution hot spots.

7. **Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?**

31. From a road user's perspective, especially major fleet operators, a national system is preferable as it avoids the need to deal with different systems which may have different rules and charges. It also provides economies of scale from an operations point of view. A more important point is that a national scheme is able to replace fuel and vehicle excise duties where a regional or city scheme would be unable to do.

32. However, there is a danger that a national system may not be best placed to meet the

local transport objectives of a particular city or region and the use and distribution of revenues could be set a national level.

33. A national scheme that allowed some local flexibility to adjust charges and provided a city or regional revenue stream could help address this issue.

34. There are clear advantages of being a first mover as introducing a London-wide road user charging scheme would mean all revenues would be retained in London.

8. **If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?**

35. If a national smarter road user charging scheme was introduced, we would expect to see the removal of all other motoring taxes, ie vehicle excise duty, fuel duty, London's Congestion Charge, ultra-low emission charges, and tolls and charges for using river crossings.

36. In the case of a London-only scheme it could replace London's congestion and ULEZ charges and be integrated with the proposed Blackwall and Silvertown Tunnel charges.

9. **What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?**

37. We have not answered this question

10. **If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?**

38. Given London's experience with managing the existing Congestion Charge and ULEZ, the high proportion of households that do not own a car/van and its comprehensive and integrated public transport network, it is ideally suited as a location for trialling a national distance-based road user charging scheme if London was able to retain a

significant proportion of net revenues generated.

11. **If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?**

39. We have not answered this question

12. **Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?**

40. We have not answered this question

13. **How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?**

41. We are seeing increasing worldwide interest in the use of road user charging to tackle both congestion and climate change. New York is on the cusp of introducing a London style cordon charge of $8 for cars (the scheme has been held up due to the need for Federal approvals) while other North American cities including Vancouver, Chicago, Portland and Seattle have undertaken studies into the feasibility of introducing such charges. We are also presently advising Qatar, on the feasibility of road user charging.

42. Most of the present road user charging schemes are cordon-based. However, there are some variations from London's approach. Stockholm's scheme is similar to London's in that it is a cordon-based scheme but, unlike London, different charges apply depending on the time of day a vehicle enters the charging zone, with higher charges during the morning and evening peaks.

43. Singapore has the most advanced general road user charging scheme. It has operated an Electronic Road Pricing (ERP) scheme since 1998 using a tag and beacon type system. Charges vary by road and time of day based on traffic conditions and are regularly reviewed and adjusted to meet transport objectives.

44. It is presently planning to move over to a GPS network giving the potential for a much more sophisticated charging regime. The project has been delayed by a shortage of computer chips needed for new on-board devices that need to be fitted to all vehicles. It is anticipated that the scheme could go live later in 2023.

45. Slovakia has had a nationwide satellite-based truck tolling system in place since 2010, when it covered 2,400km of motorways and major roads, split into more than 1,100 tolled sections. In 2014, over a 3-month period, this coverage was extended by 15,000km and more than 3,000 additional tolled sections, without the need for extensive gantries[7]. Satellite tolling for HGVs is in operation in seven European countries.

End

[7] https://www.itf-oecd.org/satellite-navigation-gnss-bringing-innovation-road-user-charging

Response from: Surrey County Council

Reference	RUC2816

London Assembly – Transport Committee
Call for Evidence: The future of smart road user charging February 2023

To London Assembly Transport Committee (scrutiny@london.gov.uk)

Surrey County Council response to Call for Evidence: The future of smart road user charging February 2023.

On behalf of Surrey County Council, I welcome the opportunity to respond to the consultation on the Call for Evidence: The future of smart road user charging through this covering letter. I understand that some or all my responses may be cited in any future output in the form of a published letter or report by the London Assembly.

Key questions

1. Do the current road user charging systems in London require reform?

Yes, these should be rationalised so there is single charge that covers congestion, emissions, usage etc. Any reform should be based on up-to-date data and evidence base alongside detailed impact assessment, including air quality to those Local Authorities bordering the Greater London Authority (GLA) area. For example, Surrey shares a significant length of boundary to the south and west of the (GLA). Seven of our eleven district/borough councils make up this boundary (Tandridge, Reigate & Banstead, Mole Valley, Epsom & Ewell, Elmbridge, Spelthorne, and Runnymede. Therefore, it is expected that any reform to the current Central London Congestion Charge scheme (CLoCCS), the Low Emission Zone (LEZ) and the proposed expansion of Ultra Low Emission Zone (ULEZ) will impact a significant number of Surrey residents, communities, and businesses particularly those in proximity to any reform in road charging systems in London.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

Smarter charging should not be a flat charge instead it should differ depending on the size, weight, fuel type of the vehicle, occupancy level, time of travel etc with agreed discounts or exemptions for key workers, mobility impaired, and the elderly. Application of these exemptions should also be considered to those outside of the GLA area, such as Surrey, which was notably not the case for the recent ULEZ expansion proposals.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities, or essential services?

Travelling for work charges should be priced so that the public transport offers a cheaper or equal cost alternative solution to using private vehicles where that is a feasible option. Certain occupational groups i.e. clinical staff within essential services

should be exempted or have reduced parking charges and peak periods road user charges where feasible.

The council would also like to stress the importance of Surrey and its need for significant improvements to its connectivity and accessibility into and out of London- the impact of through trips on public transport and both strategic and local highway networks are significant. We know that many of our residents regularly travel into London to access NHS facilities, with an estimated 28,000+ Surrey residents registered to London GP practices. These journeys are required for regular check- ups, and/or travelling to places such as the Royal Marsden, St Helier & Kingston Hospitals for specialist appointments. Many visits require lifts from family, friends, or carers, who could be financially impacted by any reforms to current charging schemes and any proposed changes, for such important visits.

4. What strategies and targets could smarter road user charging support?

Strategies should include Cleaner Air, decarbonisation, increasing Public Transport patronage, Health & Well Being, quality of life and maintenance.

Appropriate social, economic, and environmental impact assessments should inform a comprehensive evidence base pan London and for each bordering Local Authority to identify groups who may be identified as at risk to negative impacts and appropriate associated discounts, or exemptions should be identified.

This evidence base should enable the formulation of associated Specific, Measurable, Achievable, Realistic and Time related targets to demonstrate the benefits of operating a city-wide smart road user charging scheme.

5. What technology could be used to support smarter road user charging?

Existing ANPR with additional functionality possibly utilising Artificial Intelligence (AI) could be installed to allow different characteristics to be picked up that would feed into the charge being levied. Consideration should be given to the type of technology used and how it can be future-proofed or be adjusted or adapted to suit potential future charging options and how it could potentially be expanded to a regional or National system. Like following existing UTMC protocols on defining data structures and suitable exchange between systems & devices.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

Charging for specific times of the day, occupancy level, size and weight and fuel type of vehicle, NO2 and PM10 emissions would assist with those challenges.

Revenue from charging should be used to provide additional active travel measures and additional or extended bus services which will also assist with those challenges by providing suitable alternatives for Surrey residents. Revenue from charging that is used to offset any shortfall in existing TfL funding rather than being reinvested in this way will hinder those challenges being tackled.

7. Are Road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

A national road user charging scheme is preferred as this would create a uniform approach for all road users. A city approach may deliver the greatest benefits for the least capital investment as this would target the areas with the greatest population. The views of the sub national transport body, Transport for the South East (TfSE), should be fully engaged on any reform proposals given they also represent the interests of councils and local authorities across our area up to the GLA boundary.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

Smarter road user charging should replace Vehicle Exercise Duty, and fuel duty could be replaced by a distance-based charge which recovered the same income as currently with potentially an increase to cover the cost of running the scheme but, was no more expensive that a combination of road tax plus fuel duty derived from doing average mileage. Under this approach drivers would only expect to pay more if they did higher than average mileage and travelled in a car at peak times where suitable sustainable alternatives are readily available.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

Any scheme should allow for a range of discount or exemptions for disadvantaged groups with a suitable transition period to allow for any affordability issues to be contained. There should also be an accompanying package of mitigation measures put in place for those on low incomes including discounted public transport and further roll out of cycling and other forms of micro mobility. Discounts or exemptions should be considered for those currently living outside the GLA boundary, including Surrey and other adjacent local authorities whose residents either access services or are key workers in London. Again this was not considered as part of the recent consultation on the expansion of the ULEZ, which disadvantages a proportion of Surrey's residents and business near the GLA border who access jobs including key workers and health services.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

There may be different dynamics that apply to places outside London. On this basis a trial scheme should be looked at in several places to inform any future scheme roll-out. London should be included as part of such a trial, including capturing any associated impacts to those Local Authorities bordering the GLA area.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

They should pay the same for average mileage with incentives and disincentives for lower and higher mileage.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

n/a

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

n/a

Response from: Zipcar

Reference	RUC2824

Zipcar's evidence as part of GLA Transport Committee investigation into road user charging

Executive Summary

Zipcar welcomes the opportunity to contribute to the Transport's Committee's investigation into road user charging.

Zipcar believes that car sharing forms a central part of the Mayor's Transport Strategy, by enabling drivers to make the switch from private car use to a greater use of public transport, cycling and walking, alongside ad hoc shared car use.

Given the substantial benefits of car clubs versus private car use, plus the fact that car sharing already effectively acts as a form of road user charging, Zipcar considers that car clubs should be treated differently to the private car in any plans for future road user charging.

Car clubs already act as a form of road user charging in two ways:

- Pay only when they drive, similar to road user charging - our members rent our vehicles on a pay as you go basis, only paying for the time that they are using the vehicle.
- Reduce congestion - each car club vehicle in London removes 24 private vehicles from the road, equating to over 85,000 fewer vehicles on London's roads. CoMoUK has also forecast in its Driving London Forward report that there is considerable scope for car sharing to grow in London with a further 650,000 households who could give up their private car, potentially removing 300,000 vehicles from London's roads

Given advances in technology since some of the current schemes were introduced, there is an opportunity to create a smarter system, which recognises the different users, and the environmental impacts of how the vehicles are used. A smarter road user charging system could therefore be used to encourage more sustainable travel behaviour, effectively incentivising individuals to make more sustainable choices. Any changes to the current system should be well communicated and tailored to consider all users – residents, businesses, and fleet owners.

Where technological changes are required to allow for a more targeted smart road user charging system, sufficient lead time should be allowed for these changes to be implemented. And any adverse cost impacts from these requirements should also be

considered and shouldn't be detrimental to those services that support the Mayor's Transport strategy.

Background on Zipcar and the benefits of car sharing

Zipcar provides a car sharing service across the majority of London, with every Londoner having access to a car club on average 10 minutes from where they live. We provide two different types of service - Round Trip which operates in the majority of London boroughs. And our one-way Flex service which is now in 15 London boroughs and also at Heathrow and Gatwick airports.

Zipcar is the largest operator in London both in terms of vehicle and membership numbers, with a fleet of around 3,000 and over half a million members. We have also made considerable steps in recent years to electrify our fleet.

By encouraging more car owners to make the switch from ownership to sharing, car clubs deliver significant benefits for London, including meeting the aims of any future road user charging proposal:

- **Reduces Congestion** - each car club vehicle in London removes 24 private vehicles from the road, equating to over 85,000 fewer vehicles on London's roads
- **Improves Air Quality** - 100% of London's car clubs are Ultra Low Emission Zone compliant, car clubs have 26% lower carbon emissions compared to the average car and 12% of London's car club fleet is fully electric compared to just 1% of private cars in the UK
- **Changes Travel Behaviour** - London's car club members walk, cycle and use public transport more than the average Londoner. 75% use public transport at least once per week compared to 42% for the average Londoner. Joining a car club drives this behavioural change.
- **Reduces Car Trips** – car club members are occasional users – 63% hire a car club 1-5 times per year.

CoMoUK has also forecast in its Driving London Forward report that there is considerable scope for car sharing to grow in London with a further 650,000 households who could give up their private car, potentially removing 300,000 vehicles from London's roads.

Car sharing is already in many ways a form of road user charging – our members rent our vehicles on a pay as you go basis, only paying for the time that they are using the vehicle. Depending on the service they choose our members can rent by the minute, hour or day. The ability to see the true cost of a trip is one of the ways that car sharing enables travel behaviour change, with users able to compare the cost of taking a vehicle with other modes of transport and choosing the best option for their trip.

The Case For Change

Whilst the current road user charging systems (Congestion Charge, Ultra Low Emission Zone,

Low Emission Zone) have been successful, they are all relatively blunt tools to address the air quality and congestion challenges that London faces. Each vehicle is treated the same regardless of how the vehicle is being used. Given advances in technology since some of the current schemes were introduced, there is an opportunity to create a smarter system, which recognises the different environmental impacts of how the vehicles are used. A smarter road user charging system could therefore be used to encourage more sustainable travel behaviour, effectively incentivising individuals to make more sustainable choices.

For example, in the current system car club vehicles pay the same congestion charge fee as any other vehicle entering the zone. However, given the benefits that car sharing brings (reduces congestion, improves air quality, changing travel behaviour and reducing car trips), they could and should be treated differently in any new system.

Therefore, rather than a simple flat daily charge, any new smarter road user charging system should take into account other factors such as for example, time of day, road being used, type of vehicle used, emissions status of the vehicles, whether the vehicle is private or shared and the distance travelled in that vehicle. This would allow for a more bespoke charge for the individual based on these factors.

For example, users could be encouraged through lower charges to use zero-emission shared vehicles rather than privately owned ICE vehicles, or to travel outside of peak hours.

Encouraging more sustainable travel choices through the set-up of the scheme will ensure that the system helps address London's combined challenges or poor air quality and congestion.

Other Considerations

Of the current road user charging systems, all Zipcar's vehicles meet the Ultra Low Emission and Low Emission Zone requirements, and the cost of the congestion charge is included in the cost of the rental.

Given the nature of car sharing, where several members may use the same vehicle during the day (more efficient use of a car than private car use) and therefore the vehicle may enter the zone more than once per day, we cannot directly pass on these costs to our members, as the amount to pass on would vary each day depending on the number of members using the vehicle in the Congestion Zone.

Recent changes to the cost for entering the Congestion Zone, including removal of the fleet discount, and time of operation has significantly increased operating costs. This is at a time when operating costs are already increasing. Whilst we unfortunately have to pass on some of these costs to members, if we were to pass on all these costs, we risk pricing car clubs out of the market and making them uncompetitive in comparison to other modes of transport such as the private car and private hire vehicles, which goes against the aims of the Mayor's Transport Strategy. It is worth noting that two car club operators have exited

the London market in the past three years. Both these companies left prior to the substantial increase in the congestion charge that took place during 2022, highlighting the already significant costs and challenges of making car sharing successful in London.

Treating car sharing differently in any new road user pricing system, would help to mitigate against the above and ensure that more sustainable travel choices are incentivised and encouraged.

Reducing the cost burden on the car sharing sector, through discounts in any proposed new road user charging scheme, would also enable Zipcar to continue its electrification efforts. Over 25% of Zipcar's fleet is already fully electric compared with around 1% of the UK private car fleet. The cost of operating an electric vehicle is still more expensive for car clubs than an ICE vehicle and any increase in costs for the business may hamper efforts to become fully electric. Electric car club fleets make access to electric vehicles accessible and affordable (they are the same price to rent as a petrol vehicle), ensuring that it is not just the wealthy who are able to benefit from electric vehicles.

Finally, if a more granular and targeted smart system is introduced, which requires additional trackers or telematics in vehicles, then additional time would be needed to implement these systems and would result in additional implementation and administrative costs for the business. These could be offset through discounts for shared vehicles in any new scheme.

Whilst the majority of our trips take place in and around London, members also rent our vehicles for longer trips throughout the UK. Any new road user charging system implemented in London, should therefore be a framework for use across the UK to avoid a patchwork approach where vehicles in one location meet local requirements, but in another do not.

Summary

Given the contribution that car clubs make to the Mayor's Transport Strategy - removing private vehicles from London's roads, reducing overall miles driven, contributing to a reduction in congestion, and helping to deliver a net zero carbon future - we propose that this is recognised in any future road user charging scheme, through discounts or exemptions.

Depending on the type of scheme introduced there should be consideration for any additional costs incurred by fleet owners to implement the changes and additional time allowed for implementation.

Response from: London Chamber of Commerce and Industry

Reference	RUC2850

London Chamber of Commerce and Industry's response to the London Assembly Transport Committee's call for evidence on the future of smart road user charging

INTRODUCTION

1. London Chamber of Commerce and Industry (LCCI) is the capital's largest independent business advocacy organisation. We represent the interests of firms of all sizes, from micro-businesses and sole traders through to large, multi-national corporates, across all 33 London local authority areas – genuinely reflecting the broad spectrum of London business opinion.

2. As the voice of London business, we seek to promote and enhance the interests of the capital's business community through representations to central government, the Mayor and London Assembly, Parliament and media, as well as international audiences. Through business surveys and commissioned research, LCCI seeks to inform and shape debate on key business issues.

Road user charging in London

3. On the issue of road user charging, LCCI has submitted two key consultation responses. The first was to the House of Common's Transport Committee inquiry into zero emission vehicles and road pricing.[1] The second submission was to Transport for London's consultation on the expansion of the Ultra-Low-Emissions Zone, and the future of road user charging in London. In both responses, LCCI has made the argument that businesses support a single, 'smart' road user charging scheme.[2]

4. Looking at the current road user charging systems in place in London, it is clear that there is need for reform. With three different schemes currently in operation, all with different aims, there is an opportunity to combine them and develop a single scheme that address multiple policy objectives. The aims of a new road user charging scheme in London should focus on improving air quality for Londoners, reducing congestion, and tackling the climate emergency. These aims align the Mayor's, and the Government's, ambitions for reaching net zero both in London (by 2030) and the UK (by 2050).

5. A future scheme in London that considers different factors could build on the objectives of the current ULEZ and Congestion Charge schemes. The factors that could influence the charge in a 'smart' road user charging scheme include the time of day and subsequent impact on congestion, the distance drive, and the impact on air quality (or how polluting the vehicle is). Accounting for the provision of more sustainable modes of transport is important too, as the provision of public transport in particular varies greatly across the capital.

6. However, when considering factors such as time of day or distance driven, there must be consideration given to the many businesses for whom the use of a vehicle is essential, and alternative modes of transport – though more sustainable – may not be suitable. London businesses operate across borough boundaries, and will cover more distance than 'leisure' or commuter vehicle traffic. Therefore, if the distance of a journey is included in the charge under a future road user charging scheme, there should be exemptions for the types of journeys conducted.

7. Similarly, businesses in sectors such as freight often have no options but to travel at times that suit customers. For example, deliveries of consumer goods happen during the day, which is when traffic is at its

[1] LCCI response to Transport Select Committee's inquiry into zero emissions vehicles and road pricing, February 2021. For ease of reference, this submission has been included as an annex below.

[2] Savanta ComRes surveyed 503 London business leaders online between 6th August and 11th September 2020.

busiest, and firms would not be able to switch their deliveries to off-peak hours as this would be disruptive to customers. Again, therefore, if there is an inclusion of the time of day as a factor in a future road user charging scheme, businesses that cannot avoid driving at peak times should be given discounts or exemptions.

8. As mentioned above, LCCI has already responded to a consultation from the Transport Committee on road pricing. There have been discussions about how Treasury will make up for lost revenues from fuel as the transition to electric vehicles continues, with the possibility of road user charging on the national road network touted as an option. It is therefore important that benefits of moving to a single road user charging scheme in London are not lost through misalignment with any future national scheme(s).

9. For businesses, a lack of complexity is key. There are many businesses based in London who travel out, and vice versa, and therefore the potential for different schemes presents challenges. When considering a future scheme in London, Transport for London and the Mayor must ensure it engages with Treasury and the Department for Transport on its own plans for road user charging, and perhaps even use the opportunity to help shape the design of a national road user charging scheme. London has been a world leader in the use of road charging schemes in the past, and there may well be an opportunity for the capital to act as a trial area for a smart road user charging scheme. London's public transport system could also support its case for trialling a 'smart' scheme, as it can support that modal shift from private vehicles.

10. It is important to note that schemes such as the Ultra-Low Emissions Zone are designed to create modal shift, which in the long-run will see lower revenues generated. Modal shift to low or zero-emission vehicles presents a financial challenge, as the current system of Vehicle Excise Duty (VED) contributes a significant amount in central government revenue. The Chancellor's decision to introduce VED for zero-emission vehicles from 2025 will help to mitigate this loss in revenue, but if the long-term aims are to shift the UK public from using vehicles to other means of transport, VED revenue will fall in the long-term. With that in mind, road user charging schemes may be necessary to provide that continued revenue stream for the public sector.

11. It is worth noting that businesses face significant cost pressures, and for many the use of a vehicle is a necessity to operating. The Mayor, and central government, should be cognisant of the sizeable costs from VED and road user charging for businesses.

12. If the Mayor of London and Transport for London do decide to design a new road user charging scheme, there must be consideration given to the amount of time before implementation. For many firms, there are planned investment cycles that are not easily shifted, and will need as much lead-in time as possible to prepare for any new schemes. The current experience of the proposed ULEZ expansion in August 2023 suggests that businesses are not as prepared as they could otherwise have been if a longer lead-in time was utilised by the Mayor.

March 2023

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COMMERCE AND INDUSTRY

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Annex: London Chamber of Commerce and Industry's response to Transport Select Committee's inquiry into zero emission vehicles and road pricing, February 2021

Introduction

1. London Chamber of Commerce and Industry (LCCI) is the capital's largest independent business advocacy organisation. We represent the interests of firms of all sizes, from micro-businesses and sole traders through to large, multi-national corporates, across a broad range of sectors in all 33 London local authority areas – genuinely reflecting the broad spectrum of London business opinion.

2. As the voice of London business, we seek to promote and enhance the interests of the capital's business community through representations to central government, the Mayor and London Assembly, Parliament and media, as well as international audiences. Through business surveys and commissioned research, LCCI seeks to inform and shape debate on key business issues.

Accelerating the shift to zero emission vehicles

3. London businesses show a heartening awareness and willingness to act on sustainability in their operations. Recent polling undertaken by YouGov, on behalf of LCCI, shows that 81% of London's business leaders were aware of the Government's 2050 net-zero emissions target.[3] Nearly three quarters (71%) are currently taking action to reduce their environmental impact.

4. Over one third of respondents (36%) cited the use of greener technologies as a method of reducing their environmental impact, rising to 43% for businesses in the motor trades, wholesale, transport & storage sectors. Close to two fifths (38%) of firms in the motor trades, wholesale, transport & storage sectors also cited the use of sustainable suppliers and sustainable procurement policies.

5. However, meeting the Government's 2050 net zero target will require all levers of the economy to make changes to their operations. In this regard, the Government has a vital role to play in encouraging businesses to make changes to their operations, that will reduce their greenhouse gas emissions. Polling conducted by YouGov shows that 57% of firms cited financial incentives as a tool for encouraging lower greenhouse gas emissions.

6. Electric vehicles remain a relatively new technology, and carry a higher price than their petrol, diesel, and even hybrid counterparts.[4] A survey by the Society of Motor Manufacturers and Traders (SMMT) from September 2020 showed that more than half of consumers polled said the price of electric vehicles was a concern.[5]

7. However, government intervention can support the growth of sales of electric vehicles. The Government introduced subsidies for sales of electric vehicles in October 2018, with cash grants up to £4,500 (it has since been lowered to a maximum of £3,000). SMMT data suggests that these grants have promoted sales of electric vehicles. In 2020, already a depressed year for overall vehicle sales, purchases of battery electric vehicles rose 185.9% from 2019. Hydrogen-powered vehicle sales were up 12.1%. Taken together, sales of

[3] YouGov surveyed 1,251 London business decision-makers online between 29th September and 5th November 2020.
[4] According to NimbleFin, the average cost of an electric vehicle in the UK in 2020 around £44,000, significantly higher than the average price for even the largest new petrol / diesel vehicles. See https://www.nimblefins.co.uk/average-cost-electric-car-uk and https://www.nimblefins.co.uk/average-cost-cars-uk.
[5] See Higher price of electric cars a concern for more than half of UK consumers, The Guardian, 4 September 2020, https://www.theguardian.com/environment/2020/sep/04/higher-price-of-electric-cars-a-concern-for-more-than-half-of-uk-consumers.

BEVs and HEVs were 13.4% of total UK car sales in 2020. This is up markedly from 5.9% in 2019.[6] By comparison, the share of sales of new petrol and diesel vehicles fell from 89.3% in 2019 to 71.4% in 2020.[7]

8. It is vitally important that the Government continues to offer incentives to change consumer habits. However, of equal import is the role of Government in helping businesses to transition their fleets to the most environmentally friendly options available. Businesses can claim a 100% first-year allowance on purchases of vehicles with low or zero CO_2 emissions, however this is restricted to cars: vans, lorries and trucks are excluded from this scheme.[8]

9. Business vehicle use often extends greatly beyond standard cars. In order to support businesses beyond the 2030 end-date for purchasing of new petrol and diesel vehicles, firms must have access to incentives. In this regard, some progress has been made. The Government has made grants available to purchase electric vans, which can total up to £8,000.[9] Taxi drivers in London are able to access grants to purchase new low or zero emission vehicles, and can receive decommissioning insurance from Transport for London to finance purchases of more sustainable taxis.[10] Whilst greater update of electric vehicles and more options for the consumer will help to push prices down, in the near-term the costs of upgrading remains a key challenge.[11] Indeed, in a 2019 poll conducted by Savanta ComRes, 33% of London businesses said that the cost of electric vehicles was the greatest barrier to increasing their use in the capital.

10. Stimulating greater demand for electric taxis would have a positive knock-on effect for economic growth outside of London.[12] The electric hybrid taxi, designed by London EV Company, is manufactured in Ansty, close to Coventry.

11. Businesses that switch to using low or zero-emissions vehicles will also require the sufficient infrastructure. For any type of battery-powered vehicle, there will be a need for charging points. Polling undertaken by Savanta ComRes for LCCI in 2019 revealed that 29% of London businesses think a lack of charging points was the greatest barrier to increased use of electric vehicles.[13] In addition, the charging points that are installed are often not suitable for business use. Whilst there are now more than 37,000 charging points available at over 13,000 locations across the UK, only 25% offer either 'rapid' or 'ultra-rapid' charging.[14] These are the only types of charging that will be usable to businesses who may need to charge during the day, such as taxi and delivery drivers. Furthermore, whilst progress has been made in accelerating the roll-out of charging points, there are still not enough for even the limited demand that is currently present.

12. There is also the issue of an overcrowded market for the delivery of these charging points. Data from ZapMap shows there are 13 different companies providing charging points, and each come with their own specific payment processes.[15] This data set also includes a smaller subset of 'other networks'. The sheer volume of different providers means one has to be prepared with different payment methods, such as

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[6] See 2020 UK car sales hit 28-year low, EV market grows rapidly, Autocar, 6 January 2021, https://www.autocar.co.uk/car-news/industry-news/analysis-2020-uk-car-sales-hit-28-year-low-ev-market-grows-rapidly#:~:text=EV%20and%20PHEV%20sales%20rise%20dramatically&text=A%20total%20of%20108%2C205%20EVs,to%204.1%25%20of%20the%20market.

[7] One caveat is that sales of 'mild-hybrid electric vehicles', which have electric motors that helps power the engine but cannot drive the vehicle on their own, have also risen. Whilst sales of MHEVs, either with petrol or diesel, are a step in the right direction, the use of fossil fuels only leads to reduced CO_2 emissions.

[8] See Claim capital allowances, GOV.UK, https://www.gov.uk/capital-allowances/business-cars.

[9] See Low-emission vehicles eligible for a plug-in grant, GOV.UK, https://www.gov.uk/plug-in-car-van-grants.

[10] See Decommissioned taxi insurance, Keith Michaels, https://www.keithmichaels.co.uk/decommissioned-taxi-insurance/.

[11] Savanta ComRes surveyed 508 London business leaders online between 30th October and 26th November 2019.

[12] See Inside LEVC, LEVC, https://www.levc.com/corporate/news/inside-levc/.

[13] Savanta ComRes surveyed 508 London business leaders online between 30th October and 26th November 2019.

[14] See ZapMap, https://www.zap-map.com/statistics/. Data valid as of 11 February 2021.

[15] See ZapMap, https://www.zap-map.com/statistics/. Data valid as of 11 February 2021.

smartcards or smartphone apps. This makes it more challenging for businesses, and indeed consumers in general. As regular of the energy networks, Ofgem could and should play a role in ensuring ease of access.

13. Shifting to zero or low emission heavy goods vehicles will be a significant challenge for the logistics industry. The range of models currently on offer to the market is small. The upcoming consultation on the future of heavy goods vehicles will offer industry specialists an opportunity to lay out the precise challenges and upsides of zero-carbon HGVs. Research conducted for the Committee on Climate Change in May 2019 suggested that the infrastructure required for servicing a zero-emissions HGV fleet will require "planning, co-ordination, supply chains, resource and materials and a skilled workforce as well as strong government policy".[16] The paper also points to an achievable date of between 2050 and 2060, suggesting the Government must look to act as quickly as possible.

A road pricing strategy for the UK

14. The Government is reportedly considering the introduction of a road pricing strategy to offset the loss of revenues from fuel duty, which will lessen with the switch to electric vehicles.[17] If a new scheme was to be introduced, there should be a focus on ensuring that there is a universal approach across the country.

15. London is uniquely poised to offer the Government a working example of a road pricing strategy. What must be clear in the Government's steps towards introducing a road pricing strategy is the purpose. For example, in London, the Congestion Charge Zone (CCZ) was implemented to reduce congestion within the specified area of the capital.[18] The funds generated from the CCZ are required to be spent on public transport in the capital, but the CCZ is not designed to be a revenue generator. Similarly, the Ultra-Low Emissions Zone (ULEZ) was implemented to encourage road users to switch to less or zero-polluting vehicles. For both the ULEZ and CCZ, users are monitored using cameras and are charged for entering these areas. This requires the use of surveillance.

16. When considering the potential options for a new road pricing strategy, the Government should consider a 'smart' scheme that can charge users a flexible price that is subject to different factors. This might be the distance that you travel in a journey, the type of vehicle you drive, and the congestion that a driver may cause by making that journey. Such a scheme was suggested in a research paper from Centre for London in April 2019.[19] The introduction of 'smart' road pricing was also backed by 31% of London businesses in a poll undertaken by Savanta ComRes in August 2020.[20]

17. If the Government implements a smart road pricing scheme, London's road pricing schemes should be aligned accordingly. For businesses who travel in and out of the capital, it would be cumbersome to pay for different schemes were this the case.[21]

18. There are important caveats of London's road pricing schemes. There are a number of exemptions based on a variety of factors, such as exemptions for black cab taxi drivers or Blue Badge holders. The

[16] See Zero Emissions HGV Infrastructure Requirements, Ricardo Energy and Environment, May 2019, https://www.theccc.org.uk/publication/zero-emission-hgv-infrastructure-requirements/, p. iii.
[17] See Treasury eyes up road pricing to plug £30bn fuel-duty gap, AutoExpress, 17 November 2020, https://www.autoexpress.co.uk/news/108123/treasury-eyes-road-pricing-plug-ps30bn-fuel-duty-gap.
[18] See Congestion Charge, politics.co.uk, https://www.politics.co.uk/reference/congestion-charge/?cmpredirect.
[19] See Green Light: Next generation road user charging for a healthier, more liveable, London, Centre for London, April 2019, https://www.centreforlondon.org/publication/road-user-charging/.
[20] Savanta ComRes surveyed 503 London business leaders online between 6th August and 11th September 2020.
[21] It is important to note that revenues generated from the Congestion Charge and Ultra-Low Emissions Zone accounted for 6.9% of Transport for London's gross income in 2019/20. Any changes to road pricing in London should consider the implications for public transport. See Annual Report and Statement of Accounts 2019/20, Transport for London, https://content.tfl.gov.uk/tfl-annual-report-2019-20.pdf, p. 72.

Government would need to recognise that many rely on vehicles for their source of income, and would need to ensure they are not overly penalised for doing so. In essence, this comes back to the central issue of what the road pricing scheme is meant to achieve.

19. If it is simply to generate revenues for public finances, then issuing a 'tax' on road users would in all likelihood be relatively simple to introduce. However, if there are also aims to reduce the numbers of vehicles on the roads, then other considerations must be made.

20. Business engagement will be crucial for any new road pricing scheme. Businesses must be consulted upon to allow for a comprehensive representation of impacts. Similarly, Government must look to provide businesses with as much as detail as possible around potential impacts. Indeed, polling conducted by Savanta ComRes for LCCI in 2019 showed that, prior to its introduction, 44% of surveyed London business leaders did not know what the impact of the new ULEZ scheme would have on their business.[22]

Submitted by London Chamber of Commerce and Industry in February 2021

[22] Savanta ComRes surveyed 571 London business leaders online between 13th February and 11th March 2019.

Response from: White Willow Consulting

Reference	RUC2858

WHITE WILLOW
TRANSPORT INTELLIGENCE

Response to the London Assembly's Transport Committee Call for Evidence on Smart Road User Charging

This response was collated by White Willow Consulting based on many discussions with an international group of experts who are experienced in smart RUC deployment. We have all worked on real schemes in the US and Europe and have built knowledge on the issues that surround deploying RUC there, as well as on UK toll schemes and the DFT's Time Distance Place Pilot.

We would be delighted to tell you more about our evidence for this but have limited ourselves to 2 pages for readability.

Question 1: Yes, as they need updating to reflect technology since implementation of the original scheme 20 years ago. There is an opportunity now to charge in more economically efficient ways and offer opportunities for better road network management using the data from new schemes. They also need to integrate with other road related costs, e.g., other charges and tolls, and parking.

Question 2: That is a policy decision but we recommend any changes be simple to understand– e.g., moving to a full time/distance place varying charge as a "big bang" will be a difficult user sell, but simpler distance-based charge is easier to explain. The US Schemes we refer to in Q13 are a simple cost per mile – for now, as are most European HGV tolling schemes

Question 3: We don't recommend trying to vary charges by use, it is too open to fraud. Discounts for user types can be done it at an aggregate level e.g., low-income drivers could have reduced rate or rebate. Any type of discounts will lead to abuse.

Question 4: We have seen a reduction of GHGs and impact on climate change overall, plus, as above, more economically efficient use of the road network

Question 5: We suggest a range of technology for distance related with no single mandated option, ranging from simple self-declaration for very low use vehicles through smartphone apps and vehicle fleet management. It can lead to integration with vehicle makers' back-office data and payment services, as used in the US where Tesla is providing telematics services as part of the purchase that include EV charges (see question 13). **One size does not fit all.**

Question 6: No Comment

Question 7: Schemes are by far best set up at city/ region as you know the local users, geography, businesses and above all politics, but they need to be made interoperable across the nation – users cannot pay for Dart Charge with a CC account at the moment (although third parties are overcoming this inertia). London showed the way for congestion charging, and could lead the way for a regional/national scheme for smart charging.

Question 8: It is very difficult to roll up / replace other general / national vehicle charges as the costs vary so much and aren't London specific – eg fuel or vehicle excise duty replacement would drive behaviours around boundaries. Obviously, it could replace the congestion charge and ULEZ, and TfL's tunnel tolls, and if expanded to national scheme could eventually replace fuel tax.

Question 9: Discounts should be as few as possible at trip level, roll them up at user or vehicle level (see the Local Resident's discount scheme on Mersey Gateway for example). Use of telematics / apps will help provide alternative provide discounts for public transport

Question 10: Yes, as London users are familiar with payment and enforcement in place, but TfL will need to open up to new ideas about interoperability and technology. It should be as wide a scheme as possible - outer London Boroughs may not be "rural" enough and the M25 should be involved

Question 11: No comment.

Question 12: Experience in the US of successful schemes and in Europe and the UK of failed ones like Edinburgh and Manchester is that a large and competent communications and stakeholder team is needed to "sell" the scheme" and rebut adverse publicity/ false news –this is key to success.

Question 13: Today more than half of US states charge an annual road use charge for 3 types of vehicles (EV-PHEV-Hybrid) with varying annual fees depending on ICE fuel consumption or no fuel consumption (BEV). Of these states, Oregon, Utah and Virginia have already shifted to an opt-in system for EVs to pay a flat fee per year, or pay by the mile. If they choose to pay by the mile, their annual costs are capped at the annual fee.

The data is collected by a variety of means from low tech (photo of the odometer) to high tech (integrated into Tesla's services).

These State schemes have been delegated to a commercial operator to collect the fees (as TfL does with CC) but the State drives the policy and publicity (as per London).

The US approach is to focus on shoring up the demise of the fuel tax as overall vehicle fuel efficiency continues to increase year in year out. So as more fuel-efficient vehicles (EVs mostly) hit the market, US states and the federal government are using distance-based charging for implementing a system in parallel to the fuel tax stop the decline in revenue from gas taxes.

Singapore and other states e.g., Qatar have deployed distance related charges using satellite data. Closer to home, many EU member states (from Belgium to Bulgaria) already use HGV distance-based charging systems. They are almost a commodity service now –using on- board technology or fleet management system data. Germany's service has been in place for over 20 years. So, HGV distance charging would be an easy first step in London – to prove customer services, enforcement, mapping, invoicing etc with a narrow user base. Different charges for different vehicle types can change behaviour and vehicle choice, and so reduce emissions. Once proven for HGVs the next step could be EV charging as in the US, then all vehicle. This "low hanging fruit" strategy reduces "big bang" risk

Many heavy vehicles coming to the UK already have a distance based tolling system. Hence interoperability with the European Electronic Toll Service would make charging and enforcing foreign vehicles easier (often a concern of stakeholders).

There are many UK experts working on tolling and charging schemes abroad and hence there is a home grown expertise, complemented by our international colleagues who bring particular expertise from US schemes and the emerging national schemes in the Netherlands, Denmark and Norway for example.

We are keen to help London change to smarter charging and share our global experiences.

Response from: Clean Air Fund

Reference	RUC2894

CAF response to the London Assembly Transport Committee Call for Evidence: The future of smart road user charging February 2023

This submission was drafted by the Clean Air Fund using preliminary research findings from the Centre for Policy Studies. The full research report will be published later this month.

1. Do the current road user charging systems in London require reform?

While the current charging systems – the congestion charge, the Low Emission Zone (LEZ) and the Ultra-Low Emission Zone (ULEZ) – have been effective at reducing air pollution and carbon emissions across London, we need to go further and faster to protect public health. There is no safe level of air pollution to breathe in. The Mayor's own report noted that we need to see a 27% reduction in kilometres travelled by road vehicles in order to reach Net Zero by 2030.[1] Reforming the current road user charging systems in London is one of the tried and tested methods for tackling climate change and air pollution at the same time.

The current road user charging systems are complex for drivers to understand and unfair in the way that they charge road users. By charging a variety of flat rate - £15 for the congestion charge, a range of £100-£300 for the LEZ, and £12.50 for the ULEZ – the current road charging schemes encourage drivers to drive as much as possible during the day, once they have incurred the initial fine in order to maximise cost-efficiencies. This is counter-intuitive to the goal of reducing air pollution and the impact of vehicles on the environment.

The amount paid under the current systems should be adapted depending on the emissions of the vehicle, the level of pollution in the area driven through and the distance driven. This would be a truly fair system which gave those who cause the most damage to the environment and the air we breathe the greatest penalty.

A new system should unify the multiple charging schemes currently in place to make the system more efficient, targeted, and simpler for people across London, as well as visitors to the city, to understand. It could also be more comprehensive in the vehicles charged, provided that it was fairer in its pricing structure. We are becoming increasingly aware that all road transport, including EVs, produces air pollution –from the tailpipe and/or as a result of road, tyre and brake abrasion. We therefore need to ensure that road charging schemes encourage full modal shift away from private vehicles and onto public transport and active travel options.

The current exemptions for Euro IV for petrol and Euro VI for Diesel vehicles encourage people to upgrade from one polluting vehicle to another. The exemptions for certain cars should be removed, if the scheme is aiming at protecting public health and reversing climate change.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

As set out above, a smarter road user charging system would deliver flexible charging. It would charge based on distance travelled, vehicle emissions and the level of pollution and congestion

within the area that was travelled in. A truly smart system could also be developed to offer additional penalties for drivers who make unnecessary journeys or take polluting vehicles to places frequented by at-risk groups. For example, a driver who takes their child a 5-minute journey to school in the car should be heavily penalised because that would be both an unnecessary journey – one that should have been walked, scooted or cycled – and is polluting an area with a high level of vulnerable people, as children are much more vulnerable to the health effects of air pollution due to the fact that their lungs are not fully developed.

A smarter system would also be able to replace the current schemes. This would simplify things for drivers and make it easier for those who don't live and drive in London every day to understand exactly how much they would pay for travelling in the capital. It would also make the system fairer by focussing the greatest charges on the most polluting vehicles and behaviours.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

As a general principle, the Assembly should be wary of concessions for specific journey types or professions. While there are certainly exceptions to the rule (such as for emergency vehicles and buses), it is essential that any new, smarter road user charging scheme encourages modal shift away from driving polluting vehicles in the capital.

However, some elements of the system may need to be means-tested, as the scrappage scheme is for ULEZ. The congestion charge for example could offer tapered discounts to those on lower incomes, as Greater Cambridge has proposed (via an application process).

We would recommend, however, that the Assembly consider exemptions for those with a disability or mobility issue that means they require private vehicular transportation in order to get around, if they are planning on moving to a distance-based road user charging system as we have recommended throughout this submission.

4. What strategies and targets could smarter road user charging support?

Smarter road user charging such as a pay-per-mile scheme would support the aims of the Mayor to reach Net Zero by 2030. It would encourage the modal shift away from private vehicles towards public transport and active travel. It would also force business to be more innovative, investing in new methods for delivering goods and services in London, such as cargo bikes.

All of this would deliver greater environmental benefits, the chief of these being much cleaner air. Air pollution is a public health emergency, contributing to around 4,000 premature deaths per year in London alone. Measures like the ULEZ have already had a major impact on reducing air pollution, particularly Nitrogen Dioxide (NO_2). A recent report found that ULEZ reduced NO_2 levels in Central London by 46% and in inner London by 21% when compared to the levels of NO_2 that would have been apparent if the scheme had not been introduced. It is clear that road user charging reduces air pollution.[2]

[2] Mayor of London (2023) **INNER LONDON ULTRA LOW EMISSION ZONE – ONE YEAR REPORT.** Available at:

https://www.london.gov.uk/sites/default/files/2023-02/Inner%20London%20ULEZ%20One%20Year%20Report%20-%20final.pdf

However, we still need to go further faster in tackling toxic air. A smarter road user charging scheme that prioritised modal shift away from private transport is essential for this.

Another benefit of a smarter road user charging scheme would be to replace the income that will be lost as a result of the transition to EVs. As we transition from petrol and diesel to electric vehicles, fuel duty receipts are going to fall precipitously, eventually reaching zero. The '£35bn **fiscal black hole**', has been described by the OBR as 'the single biggest long-term fiscal cost of successful decarbonisation'. However, this is a policy that would have to be introduced by central government, rather than the Mayor of London. And while the UK government has confirmed that vehicle excise duty (VED) will be extended to electric vehicles from 2025, it currently hasn't set out a policy for fuel duty.

5. What technology could be used to support smarter road user charging?

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

As set out in response to Question 4, a smarter road user charging system would continue to deliver benefits for air pollution primarily. Air pollution is a public health emergency, contributing to around 4,000 premature deaths per year in London alone. Measures like the ULEZ have already had a major impact on reducing air pollution, particularly Nitrogen Dioxide. A recent report found that ULEZ reduced NO2 levels in Central London by 46% and in inner London by 21% when compared to the levels of NO2 that would have been apparent if the scheme had not been introduced. It is clear that road user charging reduces air pollution.

Reducing levels of air pollution will help us tackle climate change at the same time. Reducing the number of vehicles on the road will reduce both toxic air pollution levels and CO2 levels, helping us to reach net zero by 2030.

Smarter congestion pricing could also enable far more efficient use of the roads than we have today, leading to significant reductions in traffic. At the most ambitious end of the spectrum a dynamic system could vary charges in real time depending on traffic conditions, giving users a choice of route options for any given journey with varying durations and charges. Even a relatively lower-technology option such as Singapore's ERP allows the government to modify the charges to achieve desired speed levels on a given road, far beyond what London's congestion charge can do today.

Road user charging, such as the ULEZ but also including any future, smarter scheme, is one of the best methods we have for reducing traffic levels, fighting climate change and cleaning up our air.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

Clean air schemes like ULEZ and congestion charging policies are best set up at a city or regional level – these are primarily local problems best solved by local leaders.

However, it is important to distinguish these from fuel duty and VED, which are at the national level and should remain there. We are strong supporters of per mile charging as a replacement for fuel duty and VED, but this is an issue for the national government not local authorities.

There needs to be a national solution but often it requires action at the local level to spur on Government.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

We recommend that the Mayor introduces a distance-based smart road user charging system. Ideally, this would be done in conjunction with the UK government and work nation-wide. If it was, then the new road user charging system should replace fuel duty and VED, as well as the current road user charges in London, such as ULEZ, Congestion Charge and LEZ charges. Local authorities within London should still keep parking charges; these should be increased to make parking in London more difficult and thus disincentivise car ownership.

However, if UK Government does not implement a similar road user charging system to replace fuel duty and VED, the Assembly should ensure that the distance-based road charging scheme replaces current road user charges such as ULEZ, Congestion Charge and LEZ charges. Otherwise, the Assembly risks duplicating taxes and charges on Londoners, which would be excessively burdensome.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

We would like to see an exemption for people with disabilities and mobility issues that mean they rely on private vehicles to travel around London. If they are not exempt, they risk being unfairly discriminated against because of their disability, forced to pay in order to live their daily lives.

We would also welcome a concessionary rate for those on low incomes. However, this should be tapered depending on the length of the journey. For example, the charge for driving both long distances as well as a walkable distance, such as driving your child to the nearby school, should still be higher for residents on low incomes, as a means of discouraging unnecessary car journeys. It should also be noted that those on lower incomes are much less likely to own a car than those on high incomes.[3]

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Yes. London still has some of the worst air pollution in the country, despite years of progress. We need to be going further and faster in order to protect the public health of all Londoners. A distance-based road user charging scheme would achieve this.

London is already at the forefront of clean air policy; as such, residents are much more aware of issues relating to air pollution than those in other places across the country. They are therefore more likely to readily accept the need for policy and behaviour changes in order to reduce levels of air pollution than other areas, particularly if they are perceived as fair. We have seen

[3] Foresight (2019) **Future of Mobility: Evidence Review.** Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf

the challenges of implementing charging schemes in other areas, such as in Greater Manchester where the Clean Air Zone was scrapped.

Finally, a distance-based road user charging scheme would also help to unite the existing charging schemes in London, making it simpler for drivers having to only pay one charge.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

The primary goal of a distance-based road user charging scheme is not to charge road users more or less than they are charged now, but to make sure that the scheme is based on a polluter pays principle. This will be a much fairer system than the current charging schemes, which charge everyone the same rate no matter the distance they travel.

Any new scheme should be designed to also incorporate other measures such as the total vehicle emissions and the level of pollution and congestion within the area being driven through. There should also be penalties for driving short distances that could be easily walked, scooted or cycled and for driving polluting vehicles to places that are frequented by those who are highly vulnerable to air pollution – such as schools and hospitals.

This would mean that people driving the most polluting cars, in the most polluted areas and doing unnecessary journeys, would likely pay much more than they do now. Whereas, those who drive short but essential distances in less polluting vehicles would likely pay less. In this way, those who are contributing the most to vehicle emissions and air pollution would pay the most.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

No. Provided the Mayor has the support of the Combined Authority/Assembly, they have a mandate to govern in the public interest. We have seen with the ULEZ expansion how a well-coordinated minority can challenge new policy to deliver real and lasting change.

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

One example is the **Singapore Electronic Road Pricing (ERP) system,** which was first introduced in 1998.

This scheme aims to control traffic speed through the Central Business District (the densest bit of downtown Singapore) via a system of gantries set up at strategic points. All cars are required to have an onboard unit installed that charges drivers automatically as they pass through the relevant gantry. In contrast to London and other more basic systems, which have a single charge to drive into a defined zone, in Singapore each gantry is associated with an individual variable charge. These charges are priced in 30-minute minimum increments, which vary across the day – higher at rush hour and lower in the middle of the day and at night.

The Singaporean government explicitly sets an optimal traffic speed for each road (45–65 km/h on expressways and 20–30 km/h on arterial roads). At each location, daily traffic volumes and speeds are monitored, and charges are reviewed every few months to ensure that desired speeds are being achieved. If traffic speeds rise above the optimal level at any given point the charge is decreased, and vice versa.

An interactive map on the government website displays the charges in any given location. Given the predictability of the charges over a several month period, drivers are able to modify their behaviour accordingly and hence speeds can be altered effectively.

Singapore is not resting on its laurels. The current system relies on relatively outdated technology (overhead gantries) that are expensive to maintain. The government will be introducing a new system, dubbed 'ERP2', in 2023. This new system will take advantage of GPS technology to enable distance-based road pricing. As the government describes it, "this will be more equitable than the current system, which charges all motorists the same amount as long as they pass a gantry, regardless of the distance they travel on the congested road."[4]

[4] Singapore Ministry of Transport (2022) **How ERP works as a speed booster.** Available at: https://www.mot.gov.sg/what-we-do/motoring-road-network-and-infrastructure/Electronic-Road-Pricing/Details/how-erp-works-as-a-speed-booster

Response from: Ringway Infrastructure Services Limited

Reference	RUC2896

SUBMISSION TO LONDON ASSEMBLY TRANSPORT COMMITTEE FROM RINGWAY INFRASTRUCTURE SERVICES LIMITED

INTRODUCTION

Ringway Infrastructure Services Limited welcomes the London Assembly Transport Committee's investigation into the future of smart road user charging in London. Together with its associated companies, Ringway Infrastructure Services Limited is responsible for looking after 50,000km of the UK's highway network, delivering specialist highway services across the largest highways maintenance portfolio within the UK, including the strategic road network, DBFO motorway and trunk roads and the local authority network.

This submission sets out Ringway's general views on the opportunities presented by any reform of road user charging. Ringway's response to some of the specific questions raised by the Transport Committee are set out at Annex A.

2.0 GENERAL VIEWS

The development of 5G and 6G technology presents a major opportunity to turn London's highway network into major autonomous communications corridors, or "digital highways", that increasingly reduce the environmental impact of mobility. Any reform of the current road user charging system should look to the opportunities presented by emerging technology to implement a more radical reform of the current system. While the investment would be significant and will require strong collaboration between the government, Transport for London (TfL), London Boroughs and industry for its delivery, the wider benefits will be substantial and extend far beyond a simple reform of the current charging system. These benefits can be summarised as follows:

- significantly enhanced road safety, with deaths and serious injuries reduced to a minimum (especially as the rollout of connected and autonomous vehicles gathers pace);

- delivering new and more efficient mobility models including "mobility as a service" with vehicles hired as an asset for "on demand" services with new service and use related taxation models;

- enhanced traffic management, improving and smoothing traffic flows and reducing congestion (and thereby increasing road capacity), this also links with the point above on demand / mobility as a service;

- reducing traffic noise and air pollution through smoother less congested traffic flows, opening up greener and healthier mobility options, particularly on shorter journeys; and

- substantially enhancing the life expectancy of highway assets through remote monitoring, more efficient predictive maintenance, providing highways authorities with data on the

evolving condition of highway assets and driving far greater efficiency into road maintenance activities.

It is important to recognise that almost every journey starts and ends on local roads. Therefore, to create a truly integrated road and transport network for London TfL should consider a strategy for all of London's roads, working collaboratively with all London Boroughs, to bring further benefits notably:

- enhanced traffic management, improving traffic flows – especially for emergency services – reducing congestion (and thereby increasing road capacity) and local noise and air pollution;

- enhanced and modernizing parking and curb management by providing motorists with advance information on parking availability and enabling local authorities to remotely enforce compliance and payment;

- providing motorist with information on local activities or attractions (especially relevant for tourists) creating the ability to generate additional economic activity for local communities which might not otherwise occur; and

- enabling safer active travel management (walking, cycling, micro-mobility) at a local level for all members of the community, particularly the vulnerable members of society.

Any reform of the current road user charging system in London has the opportunity to introduce a more progressive form of charging so that motorists are charged according to the time of day driving, distance travelled, vehicle occupancy, and vehicle type. In this way motorists who drive at peak times on the more congested highways are charged a premium, and the more polluting vehicles can also be charged at a higher rate. Low occupancy vehicles can also be charged at a premium. However, it is important to stress that emerging technology not only allows for the introduction of a more progressive and fairer road charging system, but also provides significant wider benefits as noted above. The wider economic and societal benefits of "digital highways" can also help to secure wider public acceptance of a national or regional road charging system.

In practice, a "digital highway" investment programme should be rolled out across the UK over time. However, it would be feasible to introduce a "digital highway" investment programme on a regional basis and TfL has the opportunity to be a lead authority in showcasing the enormous benefits that such a programme can deliver. Indeed, London has the opportunity to be trial area to demonstrate the benefits of a national "digital highways" investment programme. However, it will be important that any "digital highway" investment programme is not undertaken at too local a level as this would risk encouraging diversionary driving behaviours, thus undermining the benefits of the investment.

A "digital highways" investment programme for London will not be without its challenges. It will require strong leadership and close collaboration between many stakeholder groups. Financing and funding will also be a significant challenge given that public finances are under continued pressure. Some form of public / private partnership will need to be developed to finance and fund such a large investment programme. The wider benefits of such an investment are such that political leaders need to embrace the opportunity, not be put off by the issues that need to be addressed.

Ringway would therefore recommend that a working group should be established to assess the opportunities presented by a “digital highways” investment programme and to develop an action plan to establish the right environment and motivation for its successful delivery. Such a working group could comprise the Department for Transport, TfL, representatives of the London Boroughs and industry.

Responses to specific questions raised by the Transport Committee where Ringway feels it has the competence to respond are set out at Annex A.

RINGWAY INFRASTRUCTURE SERVICES LIMITED
MARCH 2023

ANNEX A

RESPONSE TO INDIVIDUAL QUESTIONS

Do the current road user charging systems in London require reform?

Yes, because emerging technology present a major opportunity to develop a more progressive and fairer charging system which also delivers significant wider economic and social benefits and significant improvements to the performance of London's overall highway network.

How might smarter road user charging differ from the current daily charges for driving applied in London?

How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

A "digital highways" investment programme would deliver a more progressive form of charging by applying different charging rates according to time of day travelled (higher rates for peak times, for example), vehicle occupancy and vehicle type. Driving on congested roads at peak times would incur a higher charge compared to driving outside of peak times, for example. It would be possible for key workers (e.g nurses, police, firefighters) to be given discounted charging rates or to be exempt completely.

What technology could be used to support smarter road user charging?

Emerging 5G and 6G technologies will provide all the capability that is required.

How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change.

As noted in the submission, "digital highways" will deliver significant wider benefits beyond a more progressive charging system, including enhance road safety, enhanced traffic management, reduced traffic noise and air pollution, enhanced life expectancy of highways assets through remote monitoring and predictive maintenance, and improved parking and curb management.

Are road user charging systems best set up at a city or regional level, or as a national system, and what benefits would expect from either approach?

Ideally, a "digital highways" programme should be at a national level ass that is the only way to maximise the significant benefits of the programme but it also depends on a national road charging system which, to date, the government has said it has no plans for. However, a regional "digital highway" system would be entirely feasible and London would certainly lend itself to a regional system. It would also be feasible to do it on a regional basis for areas such as the West Midlands or Greater Manchester. However, too localised a system would run the risk of diversionary travel behaviours which would undermine that value of the system.

If the government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Yes.

Response from: Unite the Union

Reference	RUC2898

Unite the Union response to The London Assembly transport committee call for evidence: The future of smart road user charging February 2023

1. Introduction

1.1. This submission is made by Unite, the UK's largest trade union with over one million members across all sectors of the economy, including manufacturing, financial services, transport, food and agriculture, construction, energy and utilities, information technology, service industries, health, local government and the not for profit sector. Unite also organises in the community, enabling those who are not in employment to be part of our union.

1.2. Of particular relevance to this submission, Unite represents over around a quarter of a million members in the transport industries and hundreds of thousands more in the various industries that often rely on low paid workers.

2. Response

2.1. While Unite applauds the initiative to tackle the pollution that impacts the health of every resident or worker in London, there are elements of the proposals that have a substantive impact on low paid workers that keep the economy of London running. These workers often travel using their own vehicle as they have no other sustainable option given the time of the journey to work and home again.

2.2. Even if the cost per mile was introduced the expansion of the zone to encompass Heathrow will have a major impact on the UK economy. Heathrow is currently the airport that provides the largest volume of international travel solutions for business travellers. It is one of the country's largest freight terminals bringing in up to 60% of all UK bound and exported air freight. To make the airport viable it requires an army of workers who are paid the national minimum wage. Unite recognises that if the airport and the hundreds of companies at Heathrow increased wages, as we would wish to cover this cost, these costs will be passed on and impact all journeys via the airport.

2.3. Many of these workers cannot afford London housing costs and hence commute in and do so by car as there is no public transport solution at the times of day they need to travel in and out of the capital, if indeed they exist at all. Adding to their travel costs will therefore cause many to seek employment elsewhere or fall further into poverty. As a result hotels and restaurants, the NHS and other London businesses will discover shortages of workers willing to take up a post on minimum wage. Even if the employer is generous enough to pay the London Living wage if they need to pay even £15 a day this could wipe out almost half of the take home wage of a part time worker, cleaning a doctors surgery for example. Unite, therefore, believes that an exemption should be given to low paid workers from paying the charge on the basis of affordability.

2.4. Nationally there have been a reduction in public transport solutions and hence even in London bus routes are being axed[1]. The Department for Transport's annual bus statistics for the year ending March 2022, revealed a picture of long-term decline, with a 19 % decrease in bus vehicle miles[2]. Passenger numbers have declined since 2019/20 by over 33 % in the neighbouring areas

[1] https://www.standard.co.uk/news/london/tfl-bus-cuts-sadiq-khan-government-b1003642.html

[2] https://www.gov.uk/government/statistics/annual-bus-statistics-year-ending-march-2022

around London and by 30% in London caused by the growth in home working and a more flexible work environment for some industries which has caused services to be cut back to just the more profitable routes.

2.5. In some cases communities in rural locations around London only have a bus service one day a week and no rail service. The workers live so far out that cycling, especially on the busy roads into the capital is both too far and too dangerous and the provision of a taxi into these locations would be prohibitively expensive, so they have no options other than driving.

2.6. Charging per mile is a fairer system but to make such a service work, it would require a camera on every road junction to ensure that drivers do not route around the cameras and drive on unmonitored domestic roads. Further those who would normally cross the capital via the North and South Circular routes will now favour the M25 adding to the congestion of this motorway. Despite the addition of additional lanes, the motorway still has the reputation as the world's largest car park.

2.7. Hillingdon's records at Junction 14 M25 recorded an annual average daily flow of all vehicles amounted to 179,566 vehicles a day going past or using the junction in 2021. While this is down from 216,108 in 2019 probably due to the reasons stated earlier, this is only a 16.9% reduction. When you look at the annual average daily flow of all vehicle volumes using the A406 (North Circular) has declined overall but in some areas the volume has increased, by as much as 6.8%[3] since 2019. In this area 112,802 vehicles flowed daily in 2021 up from 105,644 in 2019. Between the junctions of the A104 and the Waltham Forest local authority boundary. On some parts of the A406 145,045 vehicles[4] passed on average daily in 2021. Unite believes that the move to extend the size of the emissions zone, will cause a large percentage of those vehicles will be displaced on to the M25 motorway. This is just one route across the capital all be it the main northerly inner greater London route. Should only half of these A406 vehicles use the M25 instead of the North or South Circular or indeed be driven onto the M25 instead of local roads, this would exceed all previous measurements of traffic flow bringing the motorway potentially causing a state of perpetual grid lock.

2.8. Diesel vehicles comply with air quality restrictions by trapping the dangerous particulates in exhaust filters when moving at urban traffic speeds. To clear these filters drivers are told to drive at speed to blown through the particulates. When the emission zone is extended, the issue of poor air quality will be displaced from the centre of London to the M25 corridor and made worse by vehicles clearing the particulates they had collected to that point. Consequently vehicles will be travelling further may often be burning fuel going nowhere and if they can travel at speed could still cause poor air quality then depending on the strength of the wind no matter from which direction the wind blows, over the outer boroughs of London.

2.9. If the M25 is brought to a standstill this will impact all the freight traveling into and leaving from the port of Dover and the "Le Shuttle" service from Folkestone, fright entering or leaving Portsmouth and the London Gateway. If not the freight will be forced onto unsuitable 'A' and 'B' roads to avoid the London area in order to access the rest of the UK. Unite fears this policy may to clear traffic from Greater London streets but may backfire badly on UK plc.

2.10. While the government plan to triple rail freight traffic by 2050 the network, this a long way from being possible. In order for road freight to avoid the Greater London area there needs to be an Essex to North Kent crossing further west of the M25 with the road network capable of carrying

the traffic to either end of the bridge from the wider road network. Any alternative transport option would require either an inland terminal to transfer the freight to the rails or to the inland waterways. Waterborne freight can carry all manner of oversize loads provided they fit through the many locks to their destination and are not on a tight time schedule given the maximum speed limits. On the rails the limit is track paths, working around the passenger timetable and if the aim is to improve air quality, to ensure the route is fully electrified from start to finish. If the rail route is not electrified the diesel trains will pump out high levels of particulates and Nitrous Oxides.

2.11. Unite supports gauge enhancement work in order to widen and raise the clearance under bridges between tracks and railway track furniture such as signal gantries in order for EU size trains to reach Wembley and beyond from the Channel tunnel. Currently trains can only go as far as Barking where they need to transfer on to UK size trains or lorries. If the London assembly helped pay for enhancement of the northern rail freight corridor between Barking and Wembley, this might alleviate some of the road traffic issues.

2.12. Finally Unite instigated the "Get me home safely" campaign for vulnerable adults and women to help ensure that provision is made to allow the individual to get home without fear of attack or abuse on their way home from or too work. CCTV cameras may help catch the culprit of a crime but they are not as great a deterrent as a human presence at a station, bus stop or in a taxi where the driver has been fully vetted. Unite does not wish to hear of yet another victim. This policy forces people out of cars, where they feel safe and on to public transport where they may not feel as secure.

3. Conclusion

3.1. Unite believes that if there has to be a charging system, charging per mile is fairer but to make such a service work, it would require a camera on every road junction to ensure that drivers do not route around the cameras and drive on unmonitored domestic roads.

3.2. Unite feels an exemption needs to be granted for workers on the London living wage or less per hour, who are least likely to be able to afford the cost of an electric car, where there are no other realistic public transport options at the time the journey is being made. Unite further believe that the move will put many thousands of workers in low paid sectors like hospitality, out of a job as they cannot afford to live on the scraps left behind once the emission zone costs are factored into their commute and take home pay.

3.3. Unite is concerned that if only London has road charging, and not the rest of the South East, that it will cause a migration out of the capital and onto the M25 causing severe congestion and damage to the UK economy as a whole circumnavigating the capital especially to and from Ports like Dover.

3.4. Unite agrees that it is preferable for journeys to be made on public transport but at the times of day when workers need to enter or leave the zone, public transport options are virtually non-existent, especially as a large proportion of low paid workers, live outside the capital to save on housing costs.

3.5. Unite would want to see London's road surface public transport, London buses, Licensed London taxis be exempt from the road charge and for further investment in increasing the bus frequency and availability especially in the outer London boroughs.

3.6. Unite believes in an intermodal approach to all transport which explore all transport options.

Unite believes that while some of the existing traffic could use alternatives to the private car, in many cases there is no other option. Unite further hopes that the funds raised from charging motorists will be used to make public transport journeys more accessible out of hours to more destinations outside the M25 and safer.

3.7. Unite believes, without exemptions for low paid workers, London's buses, taxis and investment in expanding London's public transport system then Unite will continue to oppose the plans to widen the scope of the emissions zone using road charging.

Response from: London Borough of Hackney

Reference	RUC2910

London Assembly Transport Committee meeting 28 February (Call for Evidence) London Borough of Hackney

Date: 10 March 2023
Report authors: Tobias Newland & Constant McColl

Summary
Hackney welcomes the opportunity to provide evidence to the transport committee at the London Assembly. Hackney supports the introduction of distance-based road user charging but believes the pace of change needs to be much faster than is currently envisaged. This is especially important in the context of the acknowledged need to reduce traffic in London by 27% by the end of the decade.

We support the use of such a scheme to achieve a 'just transition' to a net zero carbon London by 2030 and propose that Hackney be made a pilot area for the introduction of a road user charging scheme as well as the introduction of zero emission pilot(s) such as an extension of the Shoreditch ULEV Streets zone or other more localised pilot locations. Hackney would also support being a part of an interim camera-enforced Congestion Charge Zone style zone using the cameras at the current ULEZ area boundary

Hackney broadly supports the introduction of a distance based road user charging scheme to address the acknowledged need to reduce traffic in London by 27% by the end of the decade. Hackney is setting itself a target of a 15% reduction in traffic by 2026, however with over 40% of the borough's traffic being through traffic we need London wide traffic reduction to achieve this. We support the use of such a scheme as long as it is delivered in a fair equitable way. We also recognise the role traffic reduction has to play in achieving a net zero carbon London by 2030 and would support a well designed scheme that achieves traffic reduction without placing the burden on already stretched communities and workers, for instance through an intelligent charging mechanism.

Detailed response

Road user charging has a complementary role to play in supporting or progressing the progress made with the ULEZ and congestion charging zones already in operation.

Road user charging can have a significant impact on general traffic volumes by suppressing demand which is a different outcome targeted by the ULEZ scheme.

The ULEZ expansion scheme currently proposed will only have a limited effect on existing pollutant emissions in the borough including a 2.2% decrease in NO2 emission compared to 6-8% decrease in Outer London, but is not expected to have a significant impact on traffic levels.

TfL's own modeling shows that there will be a marginal increase in overall traffic in Hackney and other central London boroughs and resultant CO2 emissions because of the elimination of the zone boundary and some trip rerouting. This highlights the need to achieve road traffic reduction in addition to emissions charging. There is also decreasing effectiveness of emissions standards in reducing PM2.5 pollution where across London, around 90% of PM2.5 emissions from road transport are now due to non-exhaust sources including brake and tyre wear, and due to abrasion of the road surface over time. Even zero emission vehicles can be problematic in this regard especially where their increased weight could lead to potential increases in tyre wear and road surface abrasion.

We would like to note and welcome the inclusion of 2030 Net Zero Pathway in Revised MTS Hackney welcomes the revision of the MTS which highlights the need to frame London' s traffic problems in the context of the triple challenge which also includes the climate emergency and traffic congestion as well as air pollution, outlines the need to reduce vehicle km traveled on London's roads by 27% by the end of the decade.

Road User Charging - Outcomes

Hackney believes that it is important that a distance-based road user charging is introduced in the capital. The scheme should aim to reduce traffic in London to help address the triple emergency of air pollution, climate emergency and traffic congestion. Beyond that this form of road user charging can contribute to other transport objectives.

These include Health - Reducing general motor traffic can enable road space to be reallocated to unlock the potential for active travel to greatly contribute to the physical and mental health of Londoners.

Buses - reduced general traffic can help support London's bus network in terms of bus reliability and speed.

Vision Zero - Reduced traffic will help reduce this source of road danger and enable extra protected space to be devoted to vulnerable road users such as cyclists and pedestrians. Just Transition Distance-based road user charging needs to also take account of factors such as income, disability and journey purpose. Otherwise it is just a scheme for improving motoring conditions for the rich. There needs to be a 'just transition' to ‘net zero carbon’.

The limited road space in London and road user charging should be prioritised for tightly defined 'essential traffic' such as supporting the mobility of disabled people and freight, servicing and emergency trips. The road user charging system needs to embed this principle, while still aiming that most other trips should switch to walking, cycling or public transport.

Best practice and robust data privacy safeguards also need to be a really important consideration in the implementation of each and every scheme in this consultation. Road user charging needs to build on emissions-based charging and take account of vehicle type, but also should ramp up to heavily penalise second or third cars owned by the same individual.

Charges could vary by time of day, area to discourage travel during peak hours; in heavily polluted and congested areas. Need to embed road traffic reduction The scheme needs to guard against creating a fresh wave of induced traffic as reduced congestion could lead to quicker journey times meaning that even with charging there is a danger that the generalised cost of travel could remain the same bearing in mind the value of time. Reduced traffic levels need to be embedded through continued investment in road space reallocation to benefit sustainable modes.

The use of the 'the availability of alternatives to car use' could be a useful element so long as it was not used to create discounts to road user charging in areas of London where there is less public transport such as Outer London and unduly dilute the overall effectiveness of the scheme. We also believe that if the scheme is well designed it has potential to be an income generator for transport investment in London as revenues from emissions-based pollution tax revenues decline.

Response from: London Cycling Campaign

Reference	RUC1254

London Cycling Campaign response to the London Assembly Road User Charging consultation

March 2023

About LCC

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters, of whom more than 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

Introduction

LCC has long supported smart and fair road user charging (SFRUC) as a way of reducing congestion, cutting emissions, improving air quality and promoting a shift from private motor car use to public transport, shared mobilities (EV cars, cycles and scooters), walking, wheeling and cycling.

Our 2018 report on Climate Safe Streets (and update) outlined a coherent and integrated approach to tackle pollution, emissions and congestion in London. An examination of road user charging and the reasons for its urgent introduction formed a key part of that report, but the report also outlined how alternatives to motoring must be facilitated and offered to Londoners as we seek to reduce car dependency and promote active travel.

LCC strongly promoted cycling as an affordable alternative to the original congestion charge (CCZ) back in 2003. We were pleased to see a one third increase in cycling into central London, and a reduction in car use, a year later. What was missing at the time was a coherent cycle network with protected cycle lanes that would encourage cycle use. We note that the Mayor at the

time, Ken Livingstone, significantly increased investment in cycling after he was alerted to the growth in cycle use following congestion charging.

The continued growth in cycle use has led to the current Mayor making the mode shift to active travel an integral part of his transport policy which now seeks to move from 63% of trips by sustainable travel modes to 80% in 2041.

There is ample evidence from the UK and abroad that provision of safe and inviting infrastructure encourages cycle use. In London the major cycleways in central London are now filled to overflowing at peak times. We also know from surveys that a quarter or more of Londoners want to cycle or to cycle more. And the modal share data from cities like Amsterdam, Copenhagen and Cambridge all demonstrate that given the right infrastructure for active travel accompanied by disincentives to motoring such as parking charges, or other constraints, the mode share of cycling in UK cities can grow beyond 25%.

As seen in 2003, curbing demand for motoring by charging also frees up road space that can be used for other purposes. The CCZ reduced congestion and some highways authorities, most notably the City of London, took the opportunity to use released capacity to create more space for non-motorised road users, creating a virtuous circle.

We would urge London authorities to consider what action they will take to utilise spatial gains from future road pricing to further promote sustainable travel. Indeed, over time, it is clear that the effect of congestion charging has reduced as inflation has made the daily charge less prohibitive – so it's vital that all authorities plan to reallocate space to lock in what can otherwise be a medium-term drop in motor traffic.

Road pricing and the costs of motoring

The sense of urgency in addressing the amount of car travel is severely undermined by a tendency to ignore the fact that transport costs are not limited to fares, fuel prices, and the initial and depreciating value of vehicles.

The overlooked external costs encompass road traffic injuries and deaths, congestion, air pollution, noise, fuel's oil-well-to-tank journey and habitat damage. Research[1] shows that air pollution and climate costs make up 28% of the full costs of transport, marginally more than the 27% attributed to

[1] Sustainable Transport Infrastructure Charging and Internalisation of Transport Externalities, CE Delft, 2018

congestion. TfL estimates the cost of air pollution at around £3.7 billion[2] and the costs of congestion at around £5.5 billion[3].

A report from Germany[4] suggests that the average externalised cost of car use per UK inhabitant is around £800 a year. These costs would drop sharply if the vehicle fleet were decarbonised, if vehicle drivers and owners contributed more to cover the environmental and health costs of motoring, and if the burden of congestion for essential vehicle trips (especially for goods) was addressed through mode shift of passenger trips to walking, cycling and public transport, as well as mode shift of many 'last mile' freight trips to cycles.

While no politician wants – or can risk being seen – to support actions that are detrimental to the economy, overlooking all of transport's external costs helps ensure that the fallacy of motor traffic as an undisputed economic good endures in both the political and public mind. With the full costs of car-based consumption made clear, politicians should use this knowledge to be bolder in making decisions that restrict and reduce private car use.

The clear message is that what we have called 'Climate Safe Streets' are good for the economy and that Smart and Fair Road User Charging (SFRUC) is essential for a progressive transport system. Currently, the price signals for driving are far too weak to properly influence mode choice[5]. Moreover, by helping to cross-subsidise public transport, SFRUC would ease congestion for the journeys by goods vehicles and cars that remain essential[6].

The potential benefits of SFRUC are revealed by the initial results from the implementation of London's ULEZ: despite the small area of coverage, it resulted in a 4% reduction in carbon dioxide in the central zone in the first six months (equivalent to 9,800 tonnes[7]). The Centre for London's report on strategies for road user charging[8] recommends the use of a single SFRUC app with the suggested name of City Move. Such an app would charge drivers per

[2] TfL Annual Report and Statement of Accounts, Transport for London , 2019
[3] Traffic Note 4, Total vehicle delay for London 2014-15, Transport for London, 2016

[4] The True Costs of Automobility: External Costs of Cars, Technische Universität Dresden, 2012
[5] 0 Road Pricing. London TravelWatch Ruth Thompson Memorial Lecture, Paul Buchanan, 2018
[6] An Eco Levy for driving: cut carbon, clean up toxic air, and make our towns and cities liveable, Transport for Quality of Life, 2019
[7] Central London Ultra Low Emission Zone – Six Month Report, Greater London Authority, 2019
[8] Green Light: Next generation road user charging for a healthier, more liveable, London, Centre for London, 2019

mile and would apply in areas of high demand and poor air quality. The report states that if users were charged in areas of high demand, road pollution could reduce by up to a fifth. This would certainly be useful as a first step, though charges would likely have to rise to help achieve the reduced traffic targets necessary in light of the climate emergency.

We anticipate that, at least in the first phase, the SFRUC system would be based on a development of the camera infrastructure currently in place for the central London congestion charge and ULEZ. Whatever technology is chosen, however, introducing a more flexible, responsive and fairer SFRUC system, to replace the current fixed charge unrelated to distance or traffic and environmental conditions, would enable the Mayor to exercise better control over non-essential motor vehicle trips and would be a vital tool in reaching the 80% non-car mode shift target by the earlier date of 2030 which the Mayor aspires to.

An SFRUC system also has the potential to allow differential pricing for taxis/PHVs, for shared cars, relative to private cars, and, of course, to differentiate between electric or other clean-fuelled vehicles and those with internal combustion engines. Differential pricing would enable the prioritisation of more efficient and less-polluting forms of transport on different parts of the network at different times. It could also prove to be a practical and effective means of limiting the number of taxis/PHVs circulating on busy streets (as seen particularly recently with the rise of hire vehicle apps), and thereby of addressing the current problems associated with the Mayor's inability to control the number of PHV licenses issued for the city.

Cycling infrastructure improvements

As noted at the outset, at the same time as SFRUC is introduced, Londoners need to be presented with alternatives to driving to work, to the station, to school and to the shops. Road charging must be a driver of behaviour change and mode shift as well as a source of potential funding for transport improvements. In other words, SFRUC must be priced at a level to actively reduce motor vehicle journeys that could be done by other modes and the money from it must be used to enable those alternatives.

As TfL research shows, a third of car trips are shorter than 2 kilometres[9] – a distance that is easily cycled. Charging for car trips will undoubtedly incentivise

[9] https://content.tfl.gov.uk/technical-note-14-who-travels-by-car-in-london.pdf

the use of cheaper alternatives but people will not take them up if they fear road danger and/or bicycle theft.

The Mayor's target is for 70% of Londoners to live within 400 metres of a high-quality cycle route, as identified in TfL's Strategic Cycling Analysis (SCA), by 2041. According to TfL, we have recently achieved a level of 22%. That clearly needs to rise rapidly, notably in outer London where high-quality cycle routes (e.g. protected cycle tracks on main roads) remain a rarity, yet where TfL also says the potential for cycling growth is the highest.

It is also evident that more than just the SCA network will be needed to remediate London's over-dependence on cars. Measures are also required to enable walking, cycling and scooting to be the best options for shorter journeys, like the 'school run', and to better access bus stops, tube/rail stations and shared mobility services. This means implementing further Low Traffic Neighbourhoods, 'School Streets', and other local improvements for walking, cycling and scooting, and measures to make driving less popular for these short trips.

Secure parking

A little remarked element of making cycling more attractive is the provision of secure cycle parking. Many employers offer staff free or subsidized car parking which incentivises driving to work.

On the other hand, cycle parking at workplaces and stations is either unavailable or insecure. SFRUC will likely create additional road space and this must be utilised where there is demand to further drive modal shift.

We note that the Mayor made a commitment to installing 5,000 cycle hangars for people who lack the space to store cycles in their homes and the Mayor's Cycle Parking Strategy identified an immediate need for an additional 36,000 street parking spaces. We remain far off those targets.

Shared mobility

As LCC highlighted in Climate Safe Streets, shared mobility is an effective and sustainable way of reducing congestion, emissions and pollution. SFRUC has the potential to release road space that can help generate a network of locations where shared vehicles (EVs, cycles and e-scooters) can be hired.

Integrating shared mobility hire with public transport ticketing and road charging payments has already been proposed and could be used to incentivise sustainable transport choices.

Fairness

We share the view that road user charging should be accompanied by measures to support people on low incomes, but with a high level of car dependency, to access public transport and cycling more affordably.

Any income derived from charging should be retained to improve and develop walking, cycling and public transport, to provide convenient and affordable alternatives to driving. For the same reason we strongly encourage the Mayor and TfL to make it easier for Londoners to access shared electric vehicles, e-cycles and e-scooters.

Additionally, the charging levels should be regularly evaluated and revised, and be explicitly linked to achieving the Mayor's target of a 27% reduction of vehicle kilometres by 2030, as a critical component of achieving London's overall goal of reaching net zero by the same date.

Conclusion

If London is to remain in the forefront of capital cities and address climate change, we have to have an efficient and sustainable transport system. This cannot be achieved without measures to restrain growth in motor vehicle use and the consequent costs in terms of congestion, emissions, pollution and ill health. Smart and fair road user charging is an essential tool to allocate road space in our dense and congested city.

Response from: Centre for London

Reference	RUC1388

Introduction

Centre for London believes that forms of road user charging have a key role to play in delivering on several key public policy objectives, namely (a) tackling congestion, (b) promoting active travel, (c) reducing air pollution and (d) generating revenue to invest in the transport system. The Ultra Low Emission Zone (ULEZ) is the latest incarnation of road user charging, whose objective is to tackle poor air quality. While we support the extension of the ULEZ, this is relying on an outdated technology and, as we outlined in our 2019 report, the Mayor and Transport for London (TfL) should move quickly to deploy the latest technology and introduce a pay per mile smart road user charging scheme. This would be a fairer system for road users than the current binary flat charge used in the Congestion Charge (CC) and ULEZ, and can deliver on all four of the objectives outlined above.

Some of the key issues the Committee is looking to better understand are:

1. ***Do the current road user charging systems in London require reform?***

We believe the road user charging systems in London require reform. The ULEZ, the CC, and the Low Emission Zone (LEZ) need to be replaced with a **simpler**, **fairer**, and **more efficient** road user charging system that will address all the negative externalities of driving. Both the ULEZ and LEZ schemes were successful in reducing air pollution and the CC reduced the number of private vehicles driving through central London.

However, these schemes do not address all the negative externalities of car use across the city, namely congestion across London and road accidents. An efficient and fairer system would also charge people in proportion to their contribution to these negative externalities. Currently, people driving less than one kilometre are charged the same as those who drive 10 km if they happen to cross a boundary line and those who drive for 1 minute inside the zone pay the same as those who drive for 6 hours. These schemes incentivise people to not drive within the ULEZ or in central London, but they don't incentivise people to drive less. It can create situations where people drive further and take longer journeys to avoid crossing certain boundaries and paying the charge.

2. ***How might smarter road user charging differ from the current daily charges for driving applied in London?***

Smarter road user charging would differ from the current daily charges by introducing all or a combination of **distance-based**, **time-based and emissions-based charges** in a single system. The distance-based charge would encourage people to take shorter trips, the time-based charge to drive for shorter periods, whilst the emissions-based charge could encourage people to drive more environmentally friendly cars.

In addition, the technology can allow for a charge that varies depending on the time of day and level of congestion and pollution on the day, encouraging drivers to consider taking their trip during off-peak hours or at less congested and less polluted times.

Electric vehicles are currently not subject to charges under the ULEZ or the LEZ. The new road user charging should also take into consideration these vehicles as electric vehicles are also contributing to congestion and road accidents and create some pollution from their tires and brakes.

3. ***How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?***

The charges for driving in London could vary for different types of journeys with either:

- Permanent or time-limited exemptions
- Lower per mile rate
- Daily cap
- Reduced or free prices for the first specified number of miles (perhaps equivalent to the cost of the annual Vehicle Excise Duty should the Government choose not to devolve responsibility for this to London), or journeys per driver and per year
- Exemptions for journeys to major repeat medical appointments

4. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

Smarter road user charging can incentivise people to reduce the length of their car journeys and switch to less polluting cars. Reducing the length of people car journeys will assist with tackling congestion, air pollution, and climate change. The ULEZ, as an emission-based charge, has already proven successful in reducing air pollution. For instance, in central London, the concentration of NO2 is estimated to be 44 per cent lower than it would be without the introduction of the ULEZ[1].

To maximise the objectives of such a scheme, it is important to integrate the technology with the rest of the transport system to enable users to directly compare the cost of driving with the cost of using other modes of transport. This would help people to make a logical and well-informed decision on which travel mode they are going to use.

5. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

Some people are already temporarily exempt from paying the ULEZ, namely blue badge holders with a vehicle registered for one of the temporary exemptions (e.g., wheelchair accessible vehicles), some NHS patients who are clinically too ill to use public transport, and community transport. The road user charging should encompass similar discounts, however there is also a need to consider the groups that would be the most impacted by the introduction of a road user charging, such as people who drive for their livelihood. Smarter road user charging is also an opportunity to create a fairer system for people who currently live in areas with low levels of public transport. Given that outer London boroughs have less public transport, the system could charge a lower rate per mile for driving in those areas[2].

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

The total revenue generated by distance-based road user charging should be directed to achieve a specific set of objectives such as improving the public transport system or encouraging active travel. The charge should be set accordingly to meet these objectives. However, an outcome of a system that is inherently fairer will see some individuals pay more whilst others will pay less depending on their car use and the emissions of their car.

[1] Mayor of London (2022) *Expanded Ultra Low Emission Zone, Six Month Report* https://www.london.gov.uk/sites/default/files/expanded_ultra_low_emission_zone_six_month_report.pdf

[2] The current ULEZ boundaries could be used to distinguish between the two areas. The rate per miles to drive within the North and South circular Roads could be higher than outside of this zone.

Response from: United Cabbies Group

Reference	RUC1508

9 March 2023

London Assembly Transport Committee

Call for Evidence: The future of smart road user charging February 2023

Please find below a response on behalf of our member drivers as part of the Call for Evidence as the future potential of moving to road pricing model in London is of deep concern to our members who drive the public for their living.

What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

London-licensed taxis (Black Cabs) are exempt currently from the Congestion Charge and ULEZ charges because they are publicly hired vehicles and 100% wheelchair accessible. We are predominantly hailed by the public like a bus is hailed to stop at a bus stop and our sole business model is plying for hire and the roads are our working environment.

80% of our work is responding to street hails as we drive a world recognised vehicle with a For Hire light, so passengers see us and hail us to take them to a destination. Taxis operate a TFL regulated meter based on a retrospective cost index where our current tariff is balance on costs already incurred such as the cost of a purpose-built vehicle determined by TFL conditions of fitness, cost of fuel, charging for ZEC vehicles and our drivers are compelled to undertake journeys by the shortest route from A-B.

Licensed taxis (black cabs/hackney carriages) based on their legal status are a form of public transport, and as such licensed taxis and their drivers are subject to a different legislative scheme from private hire vehicles, which are not a form of public transport, and not authorised to ply for hire.

Within the Regulatory Framework, licensed taxis provide a service which supplements the existing modes of public transportation and which, in some ways, can arguably be assimilated to a universal public service. Being able to hail a taxi from the street or to pick one up from a cab rank is an essential alternative to other methods of transportation available.

The requirement to be able to hail safely and conveniently is of particular significance for disabled persons, who may find it more difficult than non-disabled persons to spot taxis and to attract their attention. It is also of particular relevance given the stringent accessibility requirements to which taxis are subject – including the requirement to be able to accommodate a standard-sized wheelchair.

Taxis are disproportionately used by those with mobility issues and those on the lowest incomes. They can also form an important part of car-free living, increasing the range of public transport, walking and cycling trips.

By contrast, PHVs, which are not permitted to operate in the street hailing market, are not subject to the same accessibility requirements. Taxis have a distinctive appearance (which is, in part, a reflection of the fact that there are only two makes of vehicle currently in production that satisfy the Conditions of Fitness), which not only assists TfL's and other enforcement officers in identifying them but also, importantly, enables other road users to distinguish them from ordinary private cars with relative ease. Not only are taxis able to ply for hire by hailing them from the street but this comprises a substantial part of their business and we are used by hundreds of thousands of passengers a week.

The Disabled Persons Transport Advisory Committee (DPTAC) published its position on the accessibility of taxis in early August 2020, highlighting the importance of taxis for disabled people both in urban and rural communities. The DPTAC works with the Department for Transport (DfT) providing advice to the government on the transport needs of disabled people. According to DPTAC all activities are aligned with its vision statement, that "disabled people should have the same access to transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and without extra cost".

In the new guidance released it reads: "Taxis and private hire vehicles (PHVs) are one of the most popular modes of transport for disabled people after the private motor car. Disabled people use taxis more than non-disabled people despite more of them living in relative poverty. Taxis provide a door-to-door service, with scope for individual assistance with the needs of a disabled passenger.

Licensed taxis (hackney carriages) are recognised as a safe and quick way of making door-to-door journeys, and the 100 per cent accessible fleet is essential for disabled people at times when other public transport is scarce, does not result in a door-to-door journey or ceases to run at full capacity.

There are comparable differences described in the judgment of Mr Justice Burton in that case was subsequently approved and upheld by the European Court of Justice upon referral from the Court of Appeal in its judgment delivered on 14 January 2015 – see: EU:C:2015:9; [2015] 1 W.L.R. 3881.

The essence of the High Court's reasoning, as approved by the European Court of Justice, focused upon the unique nature of black cabs, similar in some respects to public buses (e.g. regulated fares and wheelchair accessibility) but distinctly different in many important and significant respects from other passenger carrying vehicles like PHV.

As Burton J. stressed at paragraph 12 of his judgment:

"It is important … to set out the material differences between mini-cabs and black cabs. A Law Commission Consultation Paper issued earlier this year (No 203) described the *"two-tier licensing system"* justified by *"the very different characteristics"* of the pre-booked market and the market for hailing and picking up at ranks:

i) … only black cabs can 'ply for hire' without pre-booking.

ii) Black cabs are subject to *"compellability",* dating from the London Hackney Carriage Acts 1831 and 1853, which requires that where a black cab at a rank or in the street accepts a passenger, the taxi must take the passenger anywhere that he wishes to go, within a prescribed distance or up to a prescribed journey time. There is no such 'cab rank' obligation on a minicab.

iii) Black cabs are instantly recognised by reason of their shape and size and the illuminated TAXI sign. This is because they must comply with the Conditions of Fitness ("CoF"), which contain a number of standards (including the requirement for the illuminated sign). Currently only two vehicle makes comply with the CoF. Minicabs can be of any colour and any design: there are some 700 different makes and models of vehicles presently licensed.

iv) The fares of black cabs are strictly regulated and can only be charged by reference to a taxi meter. Minicabs are free to charge their own fares and are not metered. …

v) Black cabs are required to be adapted for wheelchair access. There are no accessibility requirements for minicabs.

vi) Before being licensed, black cab drivers must undertake the "Knowledge of London" examination process, which can take two to four years to prepare for ("the Knowledge"). Minicab drivers must before licensing undertake a topographical test, which generally takes a day. … Black cab drivers must pass the Driving Standards Agency Advanced Driving Assessment: there is no similar requirement for minicab drivers."

At paragraph 50 of his judgment Burton J. went on to record TfL's arguments in justification of its Bus Lane Policy which allowed buses and black cabs to use bus lanes but prohibited all other passenger carrying vehicles from also doing so:

> *"TfL emphasised the real difference between [black cabs and minicabs]. Black cabs alone can be hailed for pick-up on the streets. Thus, there is the need for them to be more easily visible, in the lane nearest the pavement, and for there to be ease of access from the pavement when they are flagged down. Minicabs are not permitted to be hailed off the street. This, TfL submit, is not simply a question of safety of access, but of having the would-be passengers on the pavement and the taxis adjacent to pavements. TfL's policy documents make clear that the disabled are a priority for TfL, not just in relation to the fact that the black cabs are (while the minicabs are not) required to be adjusted for wheelchairs, but also in respect of accessibility from the pavement to a cruising black cab. TfL submits that, whereas there is thus a specific distinction to be made between black cabs and minicabs, if minicabs were allowed into bus lanes, there would <u>then</u> be no apparent or justifiable distinction between minicabs and other vehicles – chauffeured cars …, hire cars, Car Club vehicles, delivery vehicles, heavy goods vehicles and all private cars. TfL points out that black cabs, unlike minicabs, are subject to compellability … and are limited by maximum fares. Minicabs do not have that disadvantage. Although they have fixed fares rather than metered fares, they can estimate those fares so as to make allowance for anticipated delays through congestion."*

In the Independent Workers Union of GB v The Mayor of London and TFL Appeal judgement from August 2020 this issue arose again where the following points where again made by TFL about difference as outlined below:

> *"Ultimately, I am persuaded by Ms Demetriou QC that whether described as part of the means or as an aim in itself, maintaining the current levels of wheelchair accessible vehicles for disabled passengers, in the form of taxis, is both reasonable and legitimate for the reasons given below, and was not a device to protect taxis at the expense of minicab drivers. The question of removing the*

congestion charge exemption for taxis was raised during the consultation process but was rejected for a number of legitimate reasons.

First, taxis are subject to different regulatory rules that legally oblige them to be wheelchair accessible and to provide a range of other accessibility features for disabled passengers.

Secondly, they are compelled to accept any hire within a 6-mile radius of Charing Cross of up to one hour in duration or 12 miles long. This means they must accept a hire where the destination is the CCZ and refusing to do so amounts to a potential offence.

Thirdly, they are expected to take the shortest, most direct route to fulfil a hire.

Fourthly, there is no ability for taxi drivers to set their own fares which are regulated by Transport for London. Taxis could not therefore recoup the charge from passengers under the current regulations. Accordingly, a different scheme involving removing the exemption for taxis would have required changes to the regulations governing taxis and would, inevitably, have involved a far more complicated scheme.

As Ms Demetriou was entitled to emphasise, it is legitimate for a decision maker to consider the ease with which a measure can be administered and its simplicity; and open to a decision maker to reject a potential alternative as too complicated.

The Court of Appeal accepted the legal status of taxis as public transport as a given in UTAG and the LTDA v The Mayor of London and TFL and this was not an area of legal dispute. TFL themselves say in the October 2021 Streetspace monitoring guidance for boroughs the following:

"Taxis have a distinct legal status and should be considered within monitoring plans. Where a monitoring plan is collecting road user data, TfL recommends that a fully classified approach is taken in order to be able to understand the benefits and impacts of a scheme on taxi journeys, as well as other classes of traffic including private hire journeys if possible (see 3.3.2 All vehicle traffic counts). Where taxis are likely to be impacted, flow and classified turning count data that distinguishes taxis from other vehicles will show the scale of these impacts. Public surveys should seek to understand the outcomes of a scheme on taxi passengers, and particularly older and disabled people."

Taxis are not the same as private cars; a taxi is always a taxi, hence why we can use bus lanes and have unique exemptions based on the legislation and Act of Parliament in place.

Our members are very concerned they will be required to absorb the additional cost of road user charging for the time they spend driving the public in addition to the TFL regulated metered fare which has to strike a balance in the fare for the travelling public, the significant cost of the purpose built vehicle and maintain their average income which was covered recently in the TFL Finance Committee Item 9 discussions and is available from 1.32.10 on the following link:

https://t.co/c6KfJAvecs

We anticipate London buses who are managed by private operators would remain exempt as they currently are from existing charges. A bus would not be expected to be required to charge the set fare for the bus journey and then ask the passenger to pay for the bus to use the road. Therefore, as taxis are publicly hired the same as a bus, we believe taxis should remain exempt in any future road charging scheme as we currently are for Congestion Charge and the existing ULEZ.

Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

Yes, the decision should have further checks and balances in place that exceed the London Mayor electoral mandate which had a low turnout in the previous election. In view of how the consultation for the ULEZ extension has been handled which ignored consultation responses and appears to have flouted the Gunning Principles based on the recent evidence of questions raised by GLA representatives an independent referendum followed by independent scrutiny should be considered.

Response from: GMB Trade Union

Reference	RUC2621

Following the request for evidence **GMB Trade Union** submits the following response.

GMB is concerned that workers, carers and special needs who can ill afford further expense must be given special consideration when considering any such scheme and would implore any authority to not only follow statutory consultation standards but also to engage in forums and local residents, charities, business groups and of course Unions to fully understand the impacts such a scheme would have upon road users.

We are at the committee's disposal should further engagement be required.

1. Does the current road user charging systems in London require reform?

Currently there is an inequality in terms of pricing models especially for key workers and individuals who use vehicles for essential journeys to and from medical facilities and outer London areas who need access to London for their work or may not be able to afford to live in London but need to access due to their working hours or the role they fulfil. GMB members work in a diverse area from policing, airports ,private hire and taxi, schools, hospital work and many unusual workplaces that require start times that may not coincide with public transport or accessibility. Reform for those who may be paying £12.50 Will feel a more equalitarian system would be a value especially where minimum mileage or mileage during low emission periods may be at lower cost don't conventional times of day for travel.

The question also arises if other forms such as Escooter and Cycle should attract charges as their prevalence grows and greater road space is dedicated and of course excise duty is lost from those who move away from motor car, BEV or ZEC vehicles.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

A road user pricing option will give the flexibility to be charged a lower amount where shorter journeys take place as well as big list of a financial strain on workers, carers and those on lower income. this will also allow individuals to consider the routes as well as multi modal transport options which may bring their expenses down.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

GMB advocate for a tariff based on roles and needs providing as an example a carer can show the requirement for lower tariff then based on their vehicle registration, they should be able to pay an alternative fee. Time of day as well as day of the week should have consideration when creating a tariff as transport in the early hours will create less emissions however it is important to consider with the increased level zero emission capable vehicles that that pricing eventually may need to increase on these vehicle types as adoption grows and this vehicle type grows in prevalence. in the intervening period a low charging rate to increase adoption of ZEC vehicles would be a value. A improved car share scheme could be adopted too.

4. What strategies and targets could smarter road user charging support?

Based on our earlier premise a removal of fixed rate charging should take place within three years and tariffs should be gradually increased rather than see an immediate implementation of full charges with the exception of LGV, Van, Private Ambulance and vehicles which may create substantive emissions.

5. What technology could be used to support smarter road user charging?

There are multiple technologies which could be considered from telephone app which works on GPS, a device similar to the Sunpass in Florida which is a preloaded or bank account linked transponder device which is used on toll roads, Camera plate recognition is a further option based on the pre-existing network of cameras already in place. Due to Number plate cloning there is a possibility that individuals could fraudulently use another individual's plate so protections would need to be included.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

There is a strong possibility some journeys maybe accomplished at alternative times to avoid congestion there was a value during the 2012 Olympics where journeys were moderated, and congestion was reduced based on these timings and with the change in technology noise emissions from internal combustion engines will be reduced with a move to zero emission capable which would allow deliveries outside daytime hours as residents would not be impacted by noise or emissions. Emission levels will continue to drop with the integration of vehicles that have extremely low or no emissions we believe that pollution levels will start to reduce markedly as more adopt appropriate transportation and alternative public transportation options improve. we cannot comment in relation to climate change as clearly this is a global issue, and a climate emergency has been created by many strands.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

There's a high possibility that way there are regional or local schemes for charging individuals from outside those communities may not be fully aware of the ramifications of travelling into an area which might have hey charging scheme even with the possibility of technology that might warn road users a simple shared payment system that recognises vehicles that cross boundaries is the most logical solution to be sure that all parties are not at risk from potential fees or fines for failing to recognise such borders. it is logical to presume government will implement a road charging scheme as revenues from excise duty diminish with the increase in battery electric vehicles and alternative energy sources.

The benefit of having a universal charging system means interoperability without the need for various platforms to talk to each other. As an example at present there are multiple platforms for charging electric vehicles meaning individuals have to choose from a plethora of applications or cards meaning individuals or businesses have to sign up and or pay to make use of the various options this is a far from ideal scenario and having one basic national system is the most practical route with a breakdown of authorities receiving their share of the combined pot based on the journey accomplished. This also gives an economy of scale rather than having multiple authorities running separate schemes with potential competing software.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

Congestion charging, ULEZ Charging, and vehicle taxes should all be removed to a single road charging system. This would enable the highest emission and most regular users paying for use opposed to those who have low use, special needs or work in keywork environments.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in
areas with low levels of public transport?

Reductions for all of those listed or exemptions based upon by a panel that could also give consideration to evidence from individuals or entities would be the most logical path it would be impractical to give an exhaustive list within this response but given our earlier commentary there are many individuals who require special consideration.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Generally, the UK government should look to another location rather than London as the impact and general size demographic and commercial infrastructure is substantive and a smaller location would be much more practical.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

in many cases we believe drivers should payless where appropriate and a greater sum based on emissions, distance, and vehicle type.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a
local referendum)?

GMB believe that many consultations are skewed, and local referendum would have a more democratic benefit but should include business as well as residents.

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

The schemes in Germany and France as an example operate on a fixed sum and a sticker (Vignette) being purchased for access. Schemes such as road tolls have been in place for some time in many cities and countries and seem to only impact those who are not able to buy lower emission vehicles or where the city has implemented systems there seems to be low resistance. Milan has a system that seems to work well.

Response from: London Borough of Bexley

Reference	RUC1771

London Assembly Transport Committee

Call for Evidence: The future of smart road user charging, February 2023

Response by the London Borough of Bexley

The Council is strongly against any form of road charging in outer London given the areas particular characterises and the adverse impacts that would result. Bexley relies solely on heavy rail and bus services for public transport provision. Services are often unreliable, lack resilience and are not flexible enough to enable multi locational trips to access dispersed services. As a result, car reliance in the borough is high and continues to grow.

Use of the car is therefore an essential feature of the social and economic life of the borough. Bexley's economy is highly reliant on van-based businesses, which provide a significant proportion of local employment whilst key workers need to have access to an often dispersed client base. The borough also has one of the highest flows of car and van-based employment related trips between London and outlying areas whilst its town centres capture a significant proportion of car-based retail spend from Dartford.

Road user charging will place significant additional financial burdens on small businesses, reducing their competitiveness and impacting on productivity and investment growth. Those who travel into outer London to spend money in local centres will divert their trade to competing centres outside London which will avoid similar barriers to the movement of goods and customers.

Sectors which provide essential services to local residents and are already experiencing a recruitment crisis will find it harder to attract and retain key workers with implications for the most vulnerable. Moreover, the lower paid and elderly, who often have high car dependency and less travel choices will particularly suffer.

The Council is aware that modern technology offers the opportunity to potentially mitigate some of these impacts. However, it does not consider that the means currently exists or are likely to exist in the foreseeable future to effectively address the complex and interrelated issues at play. These include:

- The need for significant and meaningful forward investment in public transport where it is most needed
- The need for effective, targeted discounts/exemption/caps for the disabled, low paid, key workers, small businesses and those who need to cross the London boundary
- The need for charge rates that accurately reflect the transport choices people have
- The need for meaningful co design with residents and businesses so there is ownership
- The need for a seamless approach with any national scheme developed for taxation purposes
- The need for a simple and transparent system with an ability for people to accurately calculate cost beforehand so they can make informed choices about whether and how to travel
- The need to effectively safeguard individual privacy

In the absence of a simple, fair, safe, transparent, representative, integrated and predictable scheme that clearly links to immediate and tangible benefits it is unlikely to ever garner the

broad public support required to make it acceptable to the majority of outer London residents and businesses. In that context the Council considers that efforts should be concentrated on more deliverable methods of encouraging behavioural change to reduce congestion, tackle air quality and drive down emissions including proper investment in public transport for outer London, locally led initiatives around the promotion of active travel and investment in electric charging infrastructure.

Response from: Friends of the Earth London Network

Reference	RUC1886

Friends of the Earth London Network

1. Do the current road user charging systems in London require reform?

Yes. The Committee on Climate Change recommend a 37% cut in UK car emissions by 2030 (p.7). Tackling the climate emergency requires a substantial reduction in vehicle milleage. If London brings in road charging targeting greenhouse gases, this would set a great example for other world cities, particularly because Sadiq Khan is currently chair of the global group C40 Cities.

We should remember the survey findings that about 42% of miles travelled in England are for leisure, and that higher income families drive much further than drivers in poorer households. Therefore greenhouse gas emissions from cars could be substantially reduced without causing deprivation.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

It would charge per mile, with the charge varied according to pollution level of the particular vehicle, the convenience of public transport in that area, and the level of congestion in the area at that time of day.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

Emissions of carbon dioxide and other pollutants should not be ignored on the grounds that the journey is regarded as important. It would probably be appropriate for employers to pay the charge if their employees had no other travel options besides driving. However there may be exceptional situations such as unpaid carers (e.g. relations) travelling to provide vital care whose need for a temporary exemption from charges and/or a scrappage grant could be assessed.

4. What strategies and targets could smarter road user charging support?

Cutting greenhouse gases and other air pollutants substantially, and reducing congestion.

5. What technology could be used to support smarter road user charging?

GPS technology built into many cars, including all new cars, is already available for privacy-friendly smart road charging, and used in various places such as Washington State (p. xvii). Drivers reluctant to use this could have the alternative of paying a fixed annual charge, linked to the mileage recorded on their previous three MOT certificates, but set at a somewhat higher rate.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

It would do so by cutting traffic and emissions, giving drivers an incentive to drive fewer miles, and would also cut congestion. International research shows that even quite modest road user charges can stimulate a significant proportion of people to drive less.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

A national system would have the advantage that drivers everywhere would be familiar with it and would be able to make travel choices easily by taking it into account. However because we face a climate emergency London should not shelve this vital issue by relying instead on a national government, as it is difficult to predict when the government would introduce such a scheme. Moreover as stated above, if London introduced a scheme relatively soon this would encourage other cities to do likewise, by showing that road user charging is regarded as important and feasible.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

If there was a national system it would be logical for the charges to replace fuel duy and vehicle excise duy. However it is likely that government would hesitate considerably before deciding to replace these relatively predictable revenue streams. This is another reason why London should move forward and start its own scheme as soon as possible. The scheme would be comprehensive and therefore would replace the Congestion Charge, LEZ and ULEZ.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

There should be a reduction or an exemption for a temporary period for those living in areas with inadequate public transport, until the public transport is improved to a suitable level. People on low incomes should be able to obtain a scrappage grant, and there should be sufficient notice before the scheme begins to enable people to obtain a grant and prepare for whatever alternative transport method they choose. Organisations representing disabled people should be consulted. Depending on the level of disability, certain people may require a larger scrappage grant than the amount applicable for people on low incomes.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

Because it is so urgent to cut greenhouse gas emissions, it is vital that drivers should pay substantially more per mile than at present. The scheme should include predictable incremental increases in the per mile charge, in line with the gradual improvement in public transport in areas in which it is currently insufficient. This would also help drivers to prepare for the alteration in their travel habits.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

Elected politicians need to live up to their responsibility to tackle the climate emergency without delay. London politicians should be aware of the findings that nearly two-thirds of Londoners think that “motorised transport” makes a large or very large contribution to climate change. Only one in six say they would not consider using public transport instead of driving (p.20). Seven out of eight say they are motivated to help prevent climate change. It would be appropriate to run a consultation about the different options to achieve the target level of emissions cuts, with particular reference to the transition process and to the needs of disabled people.

Response from: The Motorcycle Action Group

Reference	RUC1921

Response to London Assembly Transport Committee Call for Evidence: The future of smart road user charging February 2023

Submitted by The Motorcycle Action Group 2021 03 09

The Motorcycle Action Group (MAG) opposes the introduction of additional charges for the use of motorcycles on any road in the UK. The question of road user charging at national level is framed as a replacement for VED and Fuel Duty. This national level system is an entirely different proposition to a London only charge. Such a local charge can only be an additional cost on top of any existing or new tax revenue scheme.

We would draw the GLA Transport Committee's attention to recommendations made to Government by the Transport Select Committee in their Fourth Report on Road Pricing published 25th January 2022[1].

Recommendation 3 states: "***To promote fairness and public acceptance, any alternative road charging mechanism must (a) entirely replace fuel duty and vehicle excise duty rather than being added alongside those taxes; and (b) be revenue neutral with most motorists paying the same or less than they do currently.***"

By definition, replacing LEZ, CC, and ULEZ with a single charge cannot be revenue neutral and will certainly not lead to motorcyclists paying less than they currently do. Motorcycles are not charged under the LEZ or the Congestion Charging Zone. Only pre Euro3 motorcycles (manufactured pre-2007) face any charges currently under ULEZ (specifically they are charged for entry to the ULEZ at the same flat rate as cars). Of the pre Euro3 motorcycles in the region of three quarters are found to be compliant with the relevant NOx standard set by TfL[2]. There is thus a tiny proportion of motorcycles on London's roads that face any current charges. Any new road charging system would be universally applied to all motorcycles and would thus represent an unjustifiable increase in costs for the vast majority of riders who clearly are not the real target of schemes for reducing congestion or emissions.

Recommendation 5 states: ***"In signalling a shift to any alternative road charging mechanism, the Government must make it clear to motorists who purchase electric vehicles that they will be required to pay for road usage, as is currently the case for petrol and diesel vehicles. It must ensure that any alternative road charging mechanism incentivises motorists to purchase***

[1] https://committees.parliament.uk/publications/8754/documents/88692/default/

[2] https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/motorcycle-emissions-compliance

vehicles with cleaner emissions while contributing tax revenues to support the maintenance of the road network."

If, as described above, there is no basis for charging motorcycles in a London only road user charge, then a London scheme should assign a part of the revenue generated from other vehicles to subsidising motorcycling, whether through improved infrastructure and parking facilities, or incentives to switch from car to motorcycle trips.

Recommendation 9 states: ***"The taxes imposed by fuel duty and vehicle excise duty are increasingly duplicated by local schemes that charge motorists for entering congestion zones and clean air zones. New taxes, and particularly those that rely on new technology, take many years to introduce. The patchwork of devolved schemes may make it impossible to deliver a national road pricing scheme. The simultaneous operation of local and national road pricing schemes would subject drivers to confusion and unfair double taxation."***

This aligns with our concerns about a London region charge as it will inevitably make a national system impossible. We urge the GLA Transport Committee to accept this important recommendation and to discourage any plans being introduced for a London-only scheme.

Recommendation 14 states: ***"The successful implementation of a national, technology-based road pricing scheme is contingent on the Government explaining how data capture will work in practice, ensuring that data management is subject to rigorous governance and oversight and reassuring the public that their privacy will be protected."***

One of the major concerns raised by motorcyclists with respect to road charging is privacy. We would go further than the above recommendations' comments in stating that any system would remove the option for any individual in the country, or potentially from beyond the UK borders to opt out of the system. There is much comment that the proliferation of smart phones means that everyone's movements are already tracked, but there remains the option to opt out of owning such a device. The reality is that the option is not credible for anyone wishing to be part of modern society. The opt out option is meaningless. The additional concern with road user charging is that the tracking is now to be linked to the individual's bank account for automatic payment. This goes beyond invasion of privacy to potential for economic control of the individual by government. We believe that the potential for accidental error or even intentional economic control is not something that should be imposed on an unwilling electorate.

In its response[3] to the Transport Select Committee report, the Secretary of State has stated that "the government does not currently have plans to consider road pricing." Despite this statement MAG believes that the argument against a London only system remains valid as the national tax revenue issue will have to be dealt with at some point. Prematurely introducing a London system

[3] https://publications.parliament.uk/pa/cm5803/cmselect/cmtrans/1178/report.html

is likely to negatively impact on the interests of Londoners, and especially motorcyclists in London.

With respect to the specific questions raised in the call for evidence, we note that there is no question directly covering the privacy issue which is possibly one of the most contentious issues raised by our members. The framing is to simplify a confusing system of three separate charging schemes. With ULEZ the revenue is generated from a dwindling cohort of non-compliant vehicles, but the plan appears to propose replacing that with a permanent scheme with no suggestion of a diminishing charge as the goals of the charge are met.

1. **Do the current road user charging systems in London require reform?**

The current systems need to be scrapped, not reformed. The impact of the current ULEZ for example is merely to slightly accelerate an improvement of air quality by placing a significant financial burden on those who can least afford to upgrade their vehicle. Scrappage schemes favour those above a financial threshold who can afford to upgrade their vehicles earlier than they would otherwise do. The scheme is punishing road users for being poor, and in the process putting more individuals at the margins into poverty. London is already one of the most unequal cities in the UK in terms of economic status and such measures will only further the difference between 'haves' and 'have nots' in terms of transport access and personal freedom.

Any local road user charging has been proven unnecessary and counterproductive when applied to motorcycles. Motorcycles are, rightly, not currently subject to the LEZ or CC charges. Pre Euro3 motorcycles are charged under ULEZ, but this is demonstrably a counterproductive charge as motorcycles are proven to be beneficial in the transport mix as they reduce congestion and emissions. The ULEZ does have provision for individually testing pre Euro3 motorcycles and data supplied by the Mayor showed that approximately three quarters of all tested pre-Euro3 motorcycles were compliant with the 15ug/km standard for NOx. Owners of compliant vehicles are however expected to pay a significant charge for a test simply to prove that their motorcycle is compliant. A cost to prove compliance should in our opinion be borne by TfL, not the individual. The application of road user charges to motorcycles for the stated aims of reducing congestion, improving air quality and reducing CO2 emissions are clearly baseless.

2. **How might smarter road user charging differ from the current daily charges for driving applied in London?**

The only conceivable outcome for the application of "smarter" road user charging being applied to motorcycling is that charges will be applied to all motorcycles as opposed to the vanishingly small numbers of motorcycles that do not meet the ULEZ criteria. Given that - as stated above - motorcycles contribute to reducing congestion and emissions, this would be a risible route to take for motorcycling. A complete exemption for motorcycles would be a neutral outcome. A positive outcome would be a system that subsidises motorcycle trips.

3. **How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?**

As stated above all trips by motorcycle should be exempt, or indeed subsidised by any charging system.

4. **What strategies and targets could smarter road user charging support?**

As stated above a truly smart system would subsidise modal shift away from cars to motorcycles as well as promoting active travel and public transport.

5. **What technology could be used to support smarter road user charging?**

As stated, we oppose the premise of a locally based road user charge. For a national level approach, we suggest a simple format based purely on weight and mileage and administered as an annual charge linked to the MOT system. A regular payment scheme based on predicted mileage could be developed to assist with individuals unable to make large annual payments. This would be an immediately implementable, low capital and operational cost, and non-invasive method of applying a fair charge that closely matches the current tax revenue.

6. **How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?**

As above.

7. **Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?**

It is clear that the national interest for a road user charging system would be to replace Government revenue generated from VED and Fuel Duty. The Government will undoubtedly seek to replace this declining revenue stream, and will want to retain the authority to decide how that revenue is spent. Any system set up at city or regional level would, therefore, simply be an additional charge to use transport modes that have already been taxed at national level. We see no sense or justification for doing this.

8. **If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?**

It should only be considered at national level, should be simple to administer and fair. We oppose any attempt to create a system aimed at changing localised travel behaviours by creating additional costs for road users.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

As previously discussed, all motorcycle trips should be exempt from a London-based system. The local justifications of reducing congestion and emissions are addressed by modal shift from cars to motorcycles. Motorcycles should thus logically be exempt from a scheme with those goals. At national level the need to replace existing tax revenue from VED and Fuel Duty is justifiable for application to motorcycle trips. Our recommendation for a national system should reflect the benefits of modal shift from larger to smaller vehicles. This can be done via a simple system of mileage and vehicle weight. Mileage is currently covered by Fuel Duty, and MAG has recommended a weight only basis for VED[4]

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

No: any geographical trial would be impossible to apply as it would necessarily require a refund on monies paid through current VED and Fuel Duty. Without this refund a trial would simply be an unjust penalty for any road user in the trial area.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

Drivers should pay no more than any driver currently pays for VED and Fuel Duty. The decision to create incentives for electric vehicles through VED were ill-judged. The difficulties in applying an equivalent to Fuel Duty to electric vehicles may create an argument for per-mile charging. We would recommend that any system is based purely on mileage and vehicle weight, and applied annually based on vehicle mileage as recorded at MOT. Potentially the charge for years one and two could be paid upfront at point of purchase based on an average mileage, and then adjusted at the first MOT stage.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

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4 https://wiki.mag-uk.org/images/4/49/Position_Statement_Vehicle_Excise_Duty_2020_03_19.pdf

We do not see any justification for these powers to be devolved to mayors and local authorities. The current system has already proven to be vulnerable to abuse by the London Mayor who has overreached even an electoral mandate in his current plans to extend the ULEZ to the entire London Region. The socialised cost of the road transport system should remain the purview of national Government and levied in the national interest. Such issues should not be dealt with by simple electoral mandate as this covers multiple issues and does not provide scope for a detailed debate. The public are unlikely to be sufficiently well informed for an unprecedented and highly impactful scheme such as this without a comprehensive national debate.

Response from: City of London Corporation

09 March 2023

Reference	RUC2006

City of London Corporation response to the London Assembly Transport Committee's investigation into road user charging

The London Assembly Transport Committee has launched an investigation into the future of road user charging in London, which considers the practical issues around the potential introduction of a next generation charging scheme in London, along with the approach to be taken, strategic considerations and potential benefits and risks. The key questions of the Committee are as follows:

1. Do the current road user charging systems in London require reform?
2. How might smarter road user charging differ from the current daily charges for driving applied in London?
3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?
4. What strategies and targets could smarter road user charging support?

This response to the London Assembly Transport Committee's investigation sets out the implications for the potential proposals in the context of the City's own Corporate priorities, Climate Action Strategy (CAS) and Transport Strategy (TS).

The introduction of variable or distanced-based smarter road user charging would be the biggest change in how daily transport is paid for since the introduction of Oyster and the Congestion Charge over 20 years ago.

City of London response to the key questions of the Committee

Future road user charging designed to reduce motor vehicle traffic across the Capital is in line with the City Corporation's own corporate priorities. Reducing motor traffic in the Square Mile enables more effective and efficient use of limited street space, reduces transport related carbon emissions, improves air quality and reduces road danger.

The City Corporation continues to support efforts to avoid a car led recovery from the Covid-19 pandemic and to reduce motor traffic in central London, in line with our Transport Strategy (TS) and Climate Action Strategy (CAS). Indeed, a specific proposal within the TS is to '*take a proactive approach to reducing motor traffic (Proposal 11)*' including to '*work with TfL to develop coordinated measures across central London'* following clarification of how the Mayor will approach road user charging in future.

Specific responses to the Transport Committee's questions on future road user charging are detailed below:

1. **Do the current road user charging systems in London require reform?**

Yes, the City of London is of the view that London's existing road user charging schemes are in need of reform.

The current Congestion Charge introduced 20 years ago, was initially successful in reducing levels of traffic across the centre of the Capital, including the Square Mile. However, the effectiveness of the current charge has been eroded and the success of the scheme's traffic reduction in early years has diminished, with vehicle numbers no longer reducing as a result.

The Congestion Charge delivered a reduction in motor vehicle use in the City following its introduction in February 2003. However, with the increase in private hire vehicle numbers in central London, along with the increase in electric vehicles which qualify for an exemption

from the congestion charge, traffic numbers have again increased. The congestion charge is a simple, blanket charge which despite the introduction of the Low Emission Zone (LEZ) and more recently the Ultra Low Emission Zone (ULEZ), is not adequately able to tailor the charge to vehicle use varying by purpose, time, location or distance.

The City Corporation welcomes the potential for a broader approach to road user charging which can be more flexible and specific to achieve the ambitions of the Mayor's Transport Strategy, along with the City's own Transport and Climate Action Strategies.

The above strategies require changes which go beyond reducing vehicle emissions. A net reduction in traffic is also necessary to achieve objectives around health, road danger reduction and quality of life. Traffic reduction and congestion management should also enable remaining essential traffic to travel more efficiently to support the economy of London.

The City of London Transport Strategy aims to achieve at least a 25% reduction in motor traffic by 2030, and a 50% reduction by 2044. Reductions in all types of motor traffic will be required to achieve this, with the most significant reductions being in the number of private cars and private hire vehicles using the City's streets.

The City Corporation supports the adoption of a smarter, more sophisticated approach to managing demand for vehicle use that supersedes the existing charging schemes and delivers a more nuanced, adaptable approach.

2. **How might smarter road user charging differ from the current daily charges for driving applied in London?**

A smarter approach to charging could, for example, be varied according to patterns of demand, vehicle type or by distance travelled.

The City Corporation welcomes the potential for a mileage / use-based charge as this more accurately reflects the impact of vehicle usage on people and the environment. The current charging scheme does not accurately compensate for the negative externalities of vehicle usage in the Capital, which vary spatially, by time, distance travelled and demography. A future scheme should be designed to reduce the disproportionate negative impact on low-income/small to medium enterprise (SME) drivers of a flat rate charge, as at present. It is assumed and advised that a full Equalities Impact Assessment would be undertaken on detailed changes when developed in the future.

The City Corporation advises that charges vary by time of day to apply a more sensitive approach to managing traffic at peak times, including peak times for people walking. This also allows the opportunity to support specific sectors of the economy in central London, such as weekend and evening leisure and culture if appropriate in the future.

3. **How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?**

The City Corporation advises that charges should vary by location or route. This will allow more robust demand management through higher pricing at peak times, in congested locations, locations with poorer air quality or ones that are better served by public transport.

It is also important to ensure the information about charges, especially where they vary by time or location, is sufficient to influence choice, when the aim is to reduce the overall amount of traffic. If charges are incrementally marginal by auto charging, it may be

perceived as a general ‘tax’ on driving and have limited influence on travel choices. For example, commercial drivers might pass on costs to customers or absorb an additional cost if it is only small. A system of charging which includes a rate/price increase at a threshold of miles, or number of trips could be useful to influence choice. The City Corporation recognises there is a balance to facilitating the economy and managing traffic levels and congestion, and this broader more tailored approach, varying around time of day, type of vehicle, and location, offers the opportunity to do this better than the current flat rate congestion charge. The opportunity to look at the detail and impact of how the system might work should be considered in drafting future proposals.

The City Corporation recommends that income from a future road user charging scheme be ringfenced or channelled towards improvements to the Capital’s transport network, including within the City of London. Improvements to infrastructure and services for walking, cycling and public transport are recommended as key to support joint policy aims of the City Corporation and the Mayor. This was pivotal to the initial success of the Congestion Charge and it should be emulated in a future scheme.

A future road user charging scheme should still incorporate appropriate discounts or exemptions for certain categories of driver or vehicles, particularly for disabled drivers and passengers and those providing care or essential services.

4. What strategies and targets could smarter road user charging support?

A smarter approach to road user charging has the potential to deliver incremental benefits to a number of the City Corporation’s strategic goals. At the heart of the City Corporation’s Transport Strategy is an ambition to reduce the number of motor vehicle trips, by 25% by 2030, and by 50% by 2044. This level of vehicle trip reduction will only be achieved through further elements of demand management, alongside supply-side alternatives and incentives.

Further traffic reduction through smart road user charging will help the City Corporation deliver against its Climate Action Strategy and associated climate action targets, along with local air quality improvements. Existing air quality in the Square Mile is identified as a corporate risk for the City Corporation and in some locations levels breach national health-based targets and guidelines.

Motor vehicle traffic reduction will help to deliver a reduced feeling of traffic dominance in the City, which will help to create a more attractive, forgiving street environment. This will help deliver more space and priority for people walking, an improved cycling experience and better quality public realm.

The primary contributor to risk on the City’s street is the presence of motor vehicles. The City Corporation, along with the Mayor and TfL, has set ambitious targets for the reduction of death and serious injuries as part of its Vision Zero ambition. These targets will only be achieved through a significant long-term reduction in the number of vehicles on the City’s streets. A smart road user charging scheme will be key to helping deliver Vision Zero in the Square Mile and across the Capital.

Lastly, a reduction in the number of motor vehicles in the City delivered through the introduction of an enhanced road user charging scheme will help to deliver improved street network efficiency for remaining essential vehicles, including buses, freight and servicing and vehicles being used by people with access needs. The increased resilience provided by an enhanced road user charging scheme would benefit the day to day and strategic operation of the City’s street network.

Response from: Inclusion London and Transport for All

Reference	RUC2049

Inclusion London is a Deaf and Disabled people's organisation that works to promote equality and inclusion of Deaf and Disabled people. We support over 70 DDPOs in London and through those organisations our reach extends to 70,000 Disabled people.

Transport for All is the only disabled-led group striving to increase access to transport and streets across the UK. We are a pan-impairment organisation, guided by the passionate belief that all Deaf, disabled and older people have the right to travel with freedom and independence.

Introduction

We at Inclusion London and Transport for All fully support the fight for climate justice and understand the importance of introducing environmental initiatives that promote Active Travel and encourage the use of public transport. We value the actions the Mayor of London has taken over the years to tackle pollution, carbon emissions and congestion in London and welcome the efforts that have been made until now to reduce the circulation of polluting vehicles on the road in the city. The overarching aims of road user charging schemes of reducing pollution, reducing traffic, and reducing road danger are of critical importance to Disabled people, who we know are among the worst impacted by increased pollution levels and the effects of climate change. However, while we welcome initiatives aimed at reducing car dependency in London, we believe it must be acknowledged that there are Disabled people who rely on their cars as either drivers or passengers as their main mode of transport because they have limited travel options compared to non-disabled people.

Disabled people's travel options are limited because they face a number of barriers when travelling around the capital, including barriers to active travel (walking/wheeling and cycling) and barriers to using public transport, which we explore in detail in this submission. We believe that any future road user charging scheme should be designed taking into account these barriers and should incorporate targeted discounts for Disabled people to ensure the scheme is truly fair to all and avoids putting Disabled Londoners at

a substantial disadvantage compared to non-disabled people when travelling around London.

Barriers

A key objective of a smart road user charging scheme would be to tackle congestion and air pollution by promoting behaviour change, thus encouraging people to choose sustainable modes of travel, including using more public transport and switching to active travel, meaning walking/wheeling and cycling.

We agree on the objectives of a future smart road user charging scheme. However, we believe it must be acknowledged that there are a myriad of barriers preventing Disabled people in London from participating in active travel and using public transport, which must be considered in any conversation about road user charging. When discussing these barriers, it is important to remember that no two disabled people are the same. Many disabled people have one or more impairment types, and the barriers they face will be different depending on these impairments.

Barriers to active travel

Accessibility barriers

It must be recognised that there are some instances in which it is simply not possible for Disabled people to walk/wheel or cycle. There are cases where, even if all the physical, societal and financial barriers were removed, many Disabled people would still rely upon their cars as the only form of transport available, for reasons pertaining to their impairment or access needs. This could be due to the fact that some people might require heavy equipment (for example breathing apparatus), to the fact that they are clinically vulnerable and therefore need to take particular caution to avoid contact with bacteria/viruses, or that they need to avoid cold weather as they have to maintain body temperature.

While many Disabled people cannot switch to active travel for reasons related to their impairments, there are Disabled people who would like to walk/wheel or cycle more but they are prevented from doing so by the way the built environment is designed. A significant barrier facing Disabled people is the inaccessibility of street space.

Pavements cluttered by obstacles (including bins, signs, car charging points, A-boards, etc.) are very difficult to navigate for those with mobility impairments and can pose a hazard to those with visual impairments. They are also confusing and overwhelming for those who are neurodivergent. Indeed, 68% of disabled Londoners feel that the condition

of the pavements prevents them from being able to spend time on the city's streets, and 43% have reported that pavement obstacles/clutter were a barrier to being able to walk more[1]. Pavement clutter can prevent people from participating in active travel at any stage of the journey, and can mean that people are forced to take door-to-door transport options, i.e. private car usage (whether their own, as a passenger, or as a taxi customer).

Dockless bikes and e-scooters left in the middle of the pavement or strewn across crossings also present a hazard, and pavements that are steep, uneven, or bumpy (as a result of tree roots, cobblestones, poorly laid paving stones, etc.) are difficult to traverse in a wheelchair and can be trip-hazards. Furthermore, a lack of dropped kerbs render entire sections of pavement/walkways no-go zones for wheelchair users, and pose a trip hazard to visually impaired people.

A lack of alcoves or benches mean that people are unable to stop and rest, which can exacerbate symptoms of certain impairments and health conditions, and confusing streetscape layout, with one-way systems, poor signage, shared space and excess bollards, can be distressing and anxiety-inducing. A lack of street lighting and prevalence of hate crime can put people off walking/wheeling.

Furthermore, a lack of accessible infrastructure across the transport network more widely means that Disabled people are often unable to undertake any sort of active travel at all. In London only 79 train stations are missing tactile paving at the platform edge. If making multimodal journeys, such as walking and cycling to a bus stop or train station, the whole journey needs to be accessible. Otherwise, the only accessible option may be to drive or to take a taxi.

The situation in London is no better: 79 train stations in London are missing tactile paving at the platform edge.

Those Disabled people who can cycle also face significant barriers in doing so. According to Wheels for Wellbeing's Annual Survey of Disabled Cyclists[2], inaccessible cycle infrastructure was cited as the biggest barrier to cycling. The majority of the UK's cycling infrastructure is designed with a standard two-wheel bike in mind, on the assumption that the rider is able to dismount and lift their bike where necessary. As an example, narrow cycle lanes cannot be used by trikes, handcycles and other nonstandard cycles, and the

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[1] Mayor of London & Transport for London (2017): *Healthy Streets for London: Prioritising walking, cycling and public transport to create a healthy city.* Available at: https://content.tfl.gov.uk/healthy-streets-for-london.pdf

[2] Wheels for Wellbeing (2020): *Annual Survey of Disabled Cyclists*. Available at: https://wheelsforwellbeing.org.uk/wp-%20content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf

lack of continuous or joined up cycle routes force cyclists to dismount or perform tricky manoeuvres. It is also the case that a lack of storage facilities for non-standard cycles means it is not always practical to cycle for a commute as there is nowhere to store the cycle securely.

Furthermore, steps into the cycle lane, or lanes segregated with large kerbs without regular dropped points, are inaccessible to those who cannot dismount, as are access control barriers that are designed to prevent access to motorbikes and mopeds (for example, kissing gates or bollards).

The design and state of the roads is also a barrier: the steep or uneven camber of roads is a bigger problem for those on three wheels as the cycle can easily tip over, and speed humps, potholes, and uneven surfaces of roads are uncomfortable or dangerous to traverse in a non-standard cycle.

It is not just the poor accessibility of the streetspace that deters disabled people from walking and cycling. The wider lack of physical accessibility into businesses, workplaces, shops, venues means that it is often not practical to use a cycle or a wheeled mobility aid to get around, as it can't easily get into the buildings the person needs to access.

Financial barriers

Disabled people not only experience accessibility barriers when walking/wheeling and cycling, but also financial barriers as they often need expensive specialist equipment to be able to make Active Travel journeys and very few people can afford to pay for this equipment.

For example, the cost of adapted cycles is very high, and locks many Disabled people out of cycling: it can be as much as £500 for the most basic adult pedal trike, to £3500 for handcycles with e-assist (many hand cyclists will require e-assist as handcycling typically has a lower manual power output than pedal cycling). Some cargo bikes retail even at £6000 to £8000. The financial burden of these cycles means that often, driving is by far the cheaper and safer option.

When it comes to walking/wheeling, it needs to be considered that many Disabled people do not have mobility aids of a high enough quality - or that are adequately suited to their needs - to enable them to make active journeys on foot or using a wheelchair. Many disabled people with physical and mobility impairments are not able to self-propel heavy, clunky manual wheelchairs. Therefore, they need lightweight, dynamic, sports wheelchairs, or chairs with power assisted driving (all of which can cost thousands of

pounds and are not typically available on the NHS). Other disabled people would benefit from other occupational equipment such as smart crutches or specialist shoes. As all of these aids are expensive, scarce, or difficult to get, many end up using a car as their main mode of transport rather than making active travel journeys.

Public transport

Accessibility barriers

Public transport also comes with a variety of physical, infrastructural and attitudinal barriers. Just 92 out of 270 Tube stations in London are step free[3], and only 25% of mainline train stations nationally. From a purely infrastructural point of view, it is clear that taking the tube or train is not a viable option for many disabled Londoners.

We know from members of our community that whilst the bus is often the most accessible mode of transport for disabled people, there are a variety of barriers associated with it. This can start from the beginning of the bus journey, with poor bus stop infrastructure that lacks shelter and seating stops people with energy limiting or mobility impairments from being able to safely wait at the stop. This includes people who may have expensive medical equipment that they cannot get wet. Further, bus stops often lack clear timetables and live departure times, which can be distressing and cause further difficulties on a journey- this is a particular issue for people who have multiple interchanges on their bus journeys due to a lack of other accessible modes.

Furthermore, for disabled passengers, getting on and off the bus is the most critical part of the journey, and is fraught with barriers and opportunities for things to go wrong:

Issues getting on the bus include:

- Bus drivers refusing to pick up disabled passengers
- Buses not stopping to inform a blind or visually impaired passenger of which service is at the stop
- Negative/discriminatory behaviour from bus drivers toward disabled passenger while boarding
- Buses pulling up not close enough to kerb, or aligning the back door so it is blocked by bins, bollards, a pole etc and not accessible

[3] Transport for London, *Step-free access*. Available at: https://tfl.gov.uk/travel-information/improvements-and-projects/step-free-access#:~:text=See%20our%20page%20on%20wheelchair,tram%20stops%20are%20step%20free.

- Issues deploying ramps: ramp will not come out, ramp faulty or broken or gets jammed, ramp deployed at steep gradient so inaccessible
- Priority space for wheelchairs is already occupied by another disabled person, meaning passenger cannot board and has to wait for another bus
- Priority space for wheelchairs is already occupied illegitimately by passengers with luggage or buggies, putting disabled passenger into conflict/ uncomfortable position
- Priority seats are taken OR disabled passenger experiences negative attitudes from other passengers while using priority seats (particularly an issue for those with non-visible impairments)
- Bus is tightly packed making it difficult for disabled person to manoeuvre on and off
- Bus pulls away before disabled passenger is securely seated, leading to falls

Issues getting off the bus:

- Audio and/or visual announcements are not working, so a passenger with visual impairment or a Deaf passenger is unaware their stop has passed
- A diversion is in place and not fully communicated to passengers, so a passenger disembarks away from their normal stop
- Request stop buzzer is not working OR bus driver ignores request for stop, and does not deploy the ramp or pull up at the bus stop correctly meaning disabled passenger cannot get off the bus
- Issues deploying ramp: ramp will not come out, ramp faulty or broken or gets jammed, ramp deployed at steep gradient so inaccessible.

All of these barriers to bus and tube usage means that private car or taxi journeys are often necessary.

Financial barriers

On average, disabled people are less likely to be in work (52.7% of disabled people are employed, compared to 81% of non-disabled people[4]), and more likely to live in low income housing[5]. Disabled people on average face £583 more in living costs per month

[4] Office of National Statistics (2021), *Labour Market Status of Disabled People.* Available at https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/labourmarketstatusofdisabledpeoplea08

[5] Office of National Statistics (2019), *Disability and Housing.* Available at https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019

than non-disabled people[6], a number which is extremely likely to have increased due to the cost of living crisis. Indeed, research shows that disabled people are now making fewer essential journeys, such as to healthcare appointments, in order to save on transport costs[7].

Whilst there are concessions available for Disabled Londoners to travel via public transport, most notably through the Disabled Person's Freedom Pass, transport costs are still a significant barrier to travel via public transport for many Disabled people. Due to barriers with the application process, and narrow eligibility criteria, many Disabled Londoners are not able to obtain a Freedom Pass, meaning that their travel costs are an additional expense.

Furthermore, the changes to the Older Person's Freedom Pass and 60+ Oyster card means that concessions are no longer available during peak hours for older people.

Societal barriers

The majority of Disabled people who would like to walk/wheel and cycle cannot afford to pay for expensive equipment because they are more likely than non-disabled people to be living in poverty and experiencing material deprivation. A recent study conducted by the Institute for Fiscal Studies, shows that close to half (44%) of those in the most deprived tenth of the population in the UK are Disabled, compared with 18% among the whole working-age population.[8] In London specifically 1 in 3 families with a Disabled adult are living in poverty.[9]

Disabled people are more likely to experience poverty and inequality than people who are not disabled for various reasons. Many are out of work as they face a significant number of barriers to paid work compared to non-disabled people. When they are in employment, they work fewer hours on average and are more likely to be low paid - they tend to be paid less than nondisabled people with the same qualification level, including a degree.[10]

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[6] Scope (2019), *Disability PriceTag report.* Available at: https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag/

[7] Healthwatch (2023), *Cost of living: People are increasingly avoiding NHS appointments and prescriptions.* Available at: https://www.healthwatch.co.uk/news/2023-01-09/cost-living-people-are-increasingly-avoiding-nhs-appointments-and-prescriptions

[8] Institute for Fiscal Studies. *Living standards of working-age disability benefits recipients in the UK*, July 2022. Available at: https://ifs.org.uk/publications/living-standards-working-age-disability-benefits-recipients-uk

[9] Trust for London, *London's Poverty Profile 2021*. Available at: https://www.trustforlondon.org.uk/londons-poverty-profile-2021-covid-19-and-poverty-in-london/

[10] Joseph Rowntree Foundation. *UK Poverty 2019/20*. Available at: https://www.jrf.org.uk/report/uk-poverty-2019-20

Poverty is also compounded by the higher costs of living with a disability, including higher energy costs. Disabled people's energy costs are often higher than those of non-disabled people because they may need to run the heating more (to cope with lower mobility or prevent severe illness due to weakened immune systems) and to charge essential medical and mobility equipment. A Disabled person spends an average of £583 per month more than a non-disabled person to achieve the same standard of living. For one in five of Disabled people, these extra costs reach more than £1,000 a month.[11]

Existing benefits designed to cover these 'extra costs' are inadequate.[12] Also, once extra-cost disability benefits are discounted, nearly half of all individuals in poverty live in a household where someone is disabled.[13] Also, standard measures of fuel poverty do not capture Disabled people's additional energy needs and are therefore likely to underestimate fuel poverty among Disabled people. Moreover, those with high support needs are often forced to give up a substantial part of their benefits income (up to 40%) to pay for essential social care support. These are just some of the reasons why millions of Disabled people in the UK live in poverty.

Responses to questions

Question 1: Do the current road user charging systems in London require reform?

In London there are currently two main road user charging schemes, namely the Congestion Charge and the Ultra Low Emissions Zone (ULEZ) Charge, charges from which Disabled Londoners are exempt (permanently in the former case and temporarily in the latter case).

The Congestion Charge was introduced in 2003 by then Mayor of London, Ken Livingstone, to reduce traffic congestion and, consequently air pollution, by discouraging car use. Since the introduction of this scheme, Blue Badge holders have been receiving a 100 per cent discount to the charge in recognition of the fact they have limited travel options and that as a result, may be dependent on using a private vehicle and therefore cannot avoid the Congestion Charge. Blue Badge holders are people with serious walking

[11] Scope**.** *The Disability Tag Price Report*, February 2019. Available at: https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag/

[12] The highest level of PIP (enhanced Daily Living component plus enhanced Mobility component) is £608.60 per month. This is given only to the people with the highest extra costs: less than 1 million Disabled people receive it, which is 7% of the 14.1 million Disabled people in the UK.

[13] **J**oseph Rowntree Foundation. *UK Poverty 2019/20.* Available at: https://www.jrf.org.uk/report/uk-poverty-2019-20

and/or mobility difficulties, including people with hidden impairments that are not immediately apparent to others and who, as a result, are conferred a range of parking benefits. When a person holds a Blue Badge, it is linked to the individual rather than a vehicle, meaning it can be used by the disabled individual when travelling in another person's car. This is particularly useful, for example, when a person is unable to drive or does not have access to a vehicle and is reliant upon a friend, family member or carer to help them travel around.

In addition to the Congestion Charge, the Low Emission Zone (LEZ) was introduced in 2008 and subsequently replaced in 2019 with the Ultra-Low Emission Zone in Central London with the objective of reducing the circulation on the road of polluting vehicles and consequently tackling air pollution. Since the introduction of ULEZ in Central London, Disabled Londoners who used vehicles qualifying for the disabled tax class or disabled passenger tax class have been eligible for a 100 discount to the ULEZ charge, an exemption that was deemed insufficient as a mitigation by Disabled People's Organisations (DPOs) due to the eligibility criteria for the vehicle tax exemption being very strict. DPOs in London raised concerns about the exclusionary nature of this exemption which only mitigated the impact of the policy only for those people qualifying for the enhanced mobility rate of PIP rather than for all Disabled Londoners with mobility impairments. Inclusion London have been campaigning calling on the Mayor of London and TfL to replicate the reasonable adjustments provided for Disabled people when the Congestion Charge was introduced.

In 2022 the Mayor of London, Sadiq Khan, asked TfL to develop proposals for a public consultation on expanding the Ultra-Low Emission Zone London-wide from 2023. Following a significant number of concerns raised by DPOs in London about the lack of appropriate mitigation measures for Disabled people in the original policy proposal, who highlighted the challenges Disabled people face in switching to active travel and the various other accessibility barriers to using public transport, the Mayor of London, Sadiq Khan, decided to introduce new exemptions for Disabled people. When the ULEZ is expanded to the whole of London in August 2023, Disabled people living in both Central and outer London qualifying for certain benefits will be eligible for a 100 per cent discount to the ULEZ charge until 2027. These benefits include the:

- Standard or enhanced mobility rate of PIP
- Higher mobility rate of Disability Living Allowance
- Higher mobility rate of Child Disability Payment
- War Pensioners' Mobility Supplement
- Armed Forces Independence Payment
- Standard or enhanced rate of Adult Disability Payment (ADP).

Additional categories have also been added to the grace period's eligibility criteria. These include categories for people with a terminal illness, those registered blind and severely sight impaired, and those with children under 3 with a medical condition which means they need bulky equipment and/or need to be near a vehicle. These exemptions have been introduced in recognition that Disabled Londoners have limited travel options compared to non-Disabled people and that the cost of switching to a ULEZ compliant car is disproportionately higher for Disabled people, especially for those relying on Wheelchair Accessible Vehicles or vehicles with specific adaptations. We believe that these mitigations are a clear example of how to implement reasonable adjustments for Disabled people.

However, as DDPOs we are concerned that some Disabled people, who do not receive these benefits, will still be negatively impacted. Not all Disabled Londoners with mobility and/or sensory impairments receive or are eligible for disability benefits due to narrow eligibility criteria and complex application processes and this is specifically the case of Disabled people who are most materially deprived. A recent study conducted by the Institute of Fiscal Studies shows that out of the most deprived 10% of the working-age population in the UK, almost a third (31%) are disabled but not in receipt of a disability benefit.[14] This could be down to ineligibility (perhaps because their condition is not severe enough to entitle them) or to eligible people not claiming the benefit (perhaps because they do not know they are eligible or find the assessment process too complex or unappealing). It may also relate to wait times: there is now on average a 20-week wait between applying for and receiving disability benefits. Average wait times peaked at 26 weeks after the start of the COVID-19 pandemic, but the delay was 20 weeks even in February 2020 before the pandemic, and had been on the rise for a couple of years before that.

If a smart road user charging scheme were introduced at some point in the future, we therefore would like to see a firm commitment from the Mayor and TFL to put in place a mechanism by which those Disabled Londoners who do not receive disability benefits, including those holding Blue Badges, could apply for exemptions from road user charges.

Question 2. How might smarter road user charging differ from the current daily charges for driving applied in London?

[14] Institute for Fiscal Studies (2022), *Living standards of working-age disability benefits recipients in the UK.* Available at: https://ifs.org.uk/publications/living-standards-working-age-disability-benefits-recipients-uk

Any smart road user charges must not be more expensive than the current daily charges. Any road user charging scheme must also include mitigations for Disabled people. Please see our response to question 9.

Question 3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

We believe that any road user charging scheme should be designed taking into account people's ability to switch to active travel and public transport rather than the journey purpose of those using cars. We are of the view that charges for driving should be varied for different individuals according to their ability to walk, wheel, cycle or use public transport rather than for different types of journeys. As we explain in the introduction of this submission, Disabled people face a number of barriers to active travel and using public transport and because of this, they have limited travel options compared to non-disabled people.

However, as no technology has been yet developed to enable variations in charging depending on the type of journeys, we are unable to provide significant feedback on how charges for driving could actually be varied in practice.

In addition, we are of the view that if such technology were to be developed, it would be difficult to establish what kind of journeys can be considered essential. Of those Disabled people with mobility impairments who have access to cars in England, the majority use them to do shopping for essentials and for other personal reasons, including attending medical appointments and picking up prescriptions and medicines.[15] People with mobility impairments also rely on cars to visit friends and family at their private homes and some use cars to take part in social activities due to various reasons which we explore in detail in our answer to question 9, including barriers to active travel and to using public transport. We are of the view that journeys Disabled people make to visit friends and family and participate in social activities should not be judged altogether non-essential as taking part in social activities is fundamental for Disabled people to avoid loneliness and social exclusion, which are major causes of poor health and wellbeing.

[15]Department for Transport (2021), *National Travel Survey*. Available at: https://www.gov.uk/government/statistics/national-travel-survey-2021/national-travel-survey-2021-travel-by-disabled-people-and-people-with-mobility-difficulties

In London specifically, as of March 2021, 2.7% of the population are Blue Badge holders, meaning that there are 247,000 Blue Badge holders.[16] Disabled people use cars either as drivers or passengers and there are more Disabled people in London using cars as passengers (42% of the population) than drivers (24% of the population).[17]

It is important to emphasise that the proportion of Disabled Londoners using cars as passengers is higher than the proportion of those using them as drivers because many Disabled people rely on the support of their informal carers to be able to make essential travel journeys in London. Many Disabled people receive significant support from their informal carers who often drive the cars of their loved ones for Disabled people's personal needs, such as picking up prescriptions and medicines and driving them to medical appointments. The importance of this support was acknowledged by TfL when the Congestion Charge was introduced and has been more recently recognised by the Mayor of London and TfL who have in fact incorporated exemptions from the ULEZ charge for Disabled people's nominated drivers.

We believe that any road user charging scheme should be designed taking into account the support Disabled people receive from their informal carers to make essential travel journeys. We therefore believe that exemptions from road user charges should be in place for unpaid carers and this could be achieved by giving each Disabled person the opportunity to nominate another person as his/her driver if they do not drive themselves.

In addition to this, we would like to highlight that a very large proportion of Disabled people also receive domiciliary care from paid carers who rely on their cars to provide care to various clients during the day. We are of the view that any road user charging scheme should carefully consider the impact that charging paid carers could have on their ability to provide care to Disabled and older clients and the consequences that this could have for Disabled people's health and wellbeing.

Question 5. What technology could be used to support smarter road user charging?

Whilst we cannot comment on the specifics of tech that could be used to track road user charging, we strongly emphasise that any new technology must be co-created and user

[16] **Department for Transport.** Blue Badge scheme statistics, England:2021, January 2022. Available at: https://www.gov.uk/government/statistics/blue-badge-scheme-statistics-2021/blue-badge-scheme-statistics-england-2021

[17] **Transport for London.** Travel in London: Understanding our diverse communities 2019. Available at: https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf

tested with Disabled Londoners. If the decision is made to use existing technology, such as a black box, then considerations about Disabled people and carers must be taken into account- most notably, that they may need to be making more car journeys and thus using more road miles. If a black box or similar technology is to be used, it must be ensured that it can be taken out and placed into multiple cars if a Disabled person is using multiple cars as a passenger. Any technology used for any part of the road user charging must be fully accessible: for example, if there is an online method used to register cars or an account, the website must be fully accessible for users of assistive technology, and provide multiple formats for any instructional documents (including plain text, Easy Read, BSL translations, etc.).

Question 7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

We believe that while a national system would be beneficial in terms of clarity and consistency, a regional system may also provide benefits in terms of adjustments for areas with less reliable/no public transport (rural areas, for example). If a regional system were to be set up, it is imperative that communications and awareness raising initiatives are abundantly clear for all audiences.

Question 9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

In the introduction of this submission we have explored the various barriers to active travel and using public transport that Disabled people face when travelling around London. We have highlighted that, due to these barriers, Disabled people have limited travel options compared to non-disabled people and many rely on cars as their main mode of transport and cannot therefore avoid congestion. In light of all this, we believe that any future road user charging scheme should incorporate exemptions from road user charges for all Disabled people with mobility and sensory impairments and their unpaid carers. By providing exemptions to Disabled people, the GLA and TfL would put in place reasonable adjustments for Disabled people in line with their obligations under Equality Act 2010 and avoid putting them at a substantial disadvantage compared to non-disabled people.

The Equality Act 2010 says public authorities must comply with the public sector equality duty (PSED), a duty on public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act. The PSED requires public authorities to have due regard to eliminate unlawful discrimination, advance equality of opportunity, foster good relations between different people and, in this context, to take the needs of Disabled people into account. Having due regard means public authorities must consciously consider or think about the need to do the three things set out in the public sector equality duty.

In practice, equality of opportunity between Disabled people and non-disabled people means that public authorities should think about the need to:

- remove or reduce disadvantages experienced by Disabled people because of their impairments or conditions
- meet the needs of Disabled people
- encourage Disabled people to participate in public life and other activities.

The Equality Act says there's a duty to make reasonable adjustments if Disabled people are placed at a substantial disadvantage because of their impairments or conditions compared with non-disabled people. People and organisations providing services or public functions need to adjust and/or change any policy (formal or informal), any rule or practice to remove barriers that can put Disabled people at a substantial disadvantage compared to non-disabled people, and have an anticipatory duty to make these reasonable adjustments. This means they must plan in advance to meet the access needs of Disabled people.

We believe that, in light of obligations under Equality Act 2010, Disabled people and their unpaid carers as nominated drivers should be allowed to benefit from exemptions from future road user charges based on eligibility criteria that are currently included in the ULEZ grace period's list of eligibility criteria. These include the:

- Standard or enhanced mobility rate of PIP
- Higher mobility rate of Disability Living Allowance
- Higher mobility rate of Child Disability Payment
- War Pensioners' Mobility Supplement
- Armed Forces Independence Payment
- Standard or enhanced rate of Adult Disability Payment (ADP)

However, we believe it would be neither inclusive nor effective to restrict exemptions only to Disabled people who qualify for certain benefits as there are Disabled people who do not receive these benefits due to narrow eligibility criteria and/or complex application processes. TfL has recently recognised that the current list of grace period's eligibility criteria wasn't sufficiently comprehensive and added additional categories to the existing grace period's eligibility criteria, mirroring the eligibility criteria for Blue Badges. These include categories for people with a terminal illness, those registered blind and those who are severely sight impaired, and those with children under 3 with a medical condition which means they need bulky equipment and/or need to be near a vehicle, who either do not qualify or do not necessarily receive benefits needed for the exemption.

If a smart road user charging scheme were introduced at some point in the future, we therefore would like to see a firm commitment from the Mayor and TFL to put in place a mechanism by which those Disabled Londoners who do not receive disability benefits, including those holding Blue Badges, could apply for exemption from road user charges. We would also strongly encourage that any decisions made on discounts and exemptions are developed with DDPOs and Disabled people to ensure their suitability. This must be done on a paid consultancy basis.

Response from: By Miles

Reference	RUC2079

London Assembly Transport Committee
Call for Evidence: The future of smart road user charging February 2023

Written Evidence submitted from By Miles

Executive Summary

By Miles welcomes the opportunity to respond to the London Assembly Transport Committee regarding the development and deployment of smart road user pricing in London.

As keen supporters of the pay-by-mile method, we wholeheartedly believe that road user pricing based on usage should be brought in as a matter of priority.

We are a London based business that has become the UK leader in collecting GPS telematics data from cars, and the world leader in using data directly from connected cars, to charge customers fairly for their car insurance.

Our suggested solution to the implementation of usage-based charging would be to enhance the current ULEZ charging camera network, and use information received to calculate the amount of chargeable mileage within a zone.

By Miles offers our expertise in designing and operating technology based modern car pay-per-mile usage based products to support the Transport Committee with testing, trials, technology and consumer research.

About By Miles

By Miles is Europe’s largest real-time pay-by-mile car insurance provider. Our members pay a fixed cost to cover their car while it’s parked, and then a few pence per mile for what they actually drive.

The premise behind the policy is simple: if you drive less, you pay less for your car insurance. From an insurance perspective, a car that’s not being driven won’t have an accident, making it less likely that the owner will need to claim.

Through our innovative model, we incentivise and reward customers today for driving less (with the associated environmental, congestion and road safety benefits) as well as giving our members access to fairer insurance based on a more accurate understanding of their risk, as we base the insurance cost on the exact actual mileage driven.

This is particularly relevant during the pandemic but also post-pandemic in times of increased working from home and higher cost of living.

Since 2018, we have used a small, matchbox-sized Miles Tracker that plugs into our members' cars to accurately collect mileage data, but more recently have developed a platform to get this information directly from newer connected cars themselves.

In a world where cars are getting increasingly safer and smarter, our vision is to reduce the

cost of insuring a car journey to zero for the driver, in order to incentivise their driving less and use of improved safety features by reflecting their reduced risk in their insurance pricing. Earlier this year, we launched our connected car insurance policy across a further 10 major brands, including Mercedes-Benz, Ford, Stellantis Group and BMW/Mini.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

We believe that the simplest way to record chargeable mileage would be to utilise the current ULEZ camera network, and look at increasing the presence of these cameras over time to improve accuracy.

This method would then allow for charges to be varied based on the driver, vehicle type or time of access.

Credits could be issued to certain vehicles in the form of 'free miles'. At the point at which this threshold is reached, they begin to be charged at a standard rate.

Additionally, mileage caps can be introduced to give drivers certainty over the maximum they will be charged in any one time period.

Within the parameters of this system, additional charges for bridge and tunnel crossings could easily be automatically added to a journey cost.

5. What technology could be used to support smarter road user charging?

To our mind, the only technology requirements of this system would be to extend the existing network of ULEZ/Congestion charge cameras to include points inside the zones.

By tracking a car through the different points, we can get a good estimate of the route taken and therefore miles driven. At By Miles we have developed this technology to reconstruct a route based on a small number of points on a map, and use at scale in our usage based car insurance.

As we approach the Mayor's deadline for reduction in car travel by 2040, more camera points can be added to the network to improve accuracy.

We believe that alternatives such as the use of a mobile-based app will alienate a portion of the population that aren't able to use them or don't wish to share this data, which also drains the phone battery.

Additionally, mobile technology will not be able to reliably detect differences between car and public transport journeys, causing the potential for over charging and lack of confidence.

We believe that alternatives such as GPS tracking systems installed in cars are currently unworkable at this scale due to cost, and will also track users outside of chargeable zones, which introduces a consent and privacy concern. However as technology improves this may eventually be possible at a national level at a reasonable cost.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

Schemes can be set up at either city or national level, depending on the objective of the scheme. Multiple schemes can operate in parallel and without conflicting with each other.

A national scheme can be based on overall total miles, which is easy to measure without expensive technology. However, because it would not be fair to charge a driver who lives within a city for miles driven nationally, there is a need to differentiate where the miles are driven for city based schemes (inside or outside of the city) - which requires more technology.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

It is right to provide discounts and exemptions. A mileage based scheme easily lends itself to giving people different “per mile” rates based on the area they live, their car, income, key worker status and any disabilities.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

London is a forward looking city with a large population that has successfully implemented new groundbreaking technology in the past, such as the Oyster system. It is also one of the leading cities for alternative transport infrastructure, providing an alternative to the car.

A national distance based road user charging scheme would likely be based on the total miles driven, as currently measured through a car’s annual MOT.

Its purpose would likely be to replace fuel duty/VED, and reward/incentivise people for driving less, rather than to reduce congestion or emissions in a particular targeted area. Due to the size of the UK, a national distance based road user charging scheme would not initially be able to differentiate between miles driven in different areas. People who live in London drive many miles outside of London as well as inside.

So it could make sense to trial a scheme within London, however the national scheme trial would likely need to sit in addition to - or in parallel with, a London specific scheme targeting congestion and emissions within London.

Other

By Miles offers our expertise in designing and operating modern car usage based products to support the Transport Committee with testing, trials, technology and consumer research.

Response from: Construction Plant-hire Association

Reference	RUC2674

London Assembly Transport Committee call for evidence:
The future of smart road user charging – February 2023
Construction Plant-hire Association Policy Position

Introduction

The Construction Plant-hire Association (CPA) represents over 1,700 companies who are responsible for 85% of the construction plant used in the UK. The CPA is the leading trade association for the plant-hire sector in the UK, acting as the principal point of contact for all issues relating to the use of construction plant. Many of our members are based in, and operate, in London and the South East of England.

We welcome the opportunity to take part in the Transport Committee's call for evidence on the future of smart road-user charging. As technology changes and develops, it is important we have a policy framework that adapts and evolves in line with technology. Our submission to the call for evidence therefore reflects this need for policymakers at both a national and local level, to play their role in achieving this, while also ensuring that the construction plant-hire industry is able to operate in and around, London and its outlying regions.

The role of construction as a driver of economic growth in London

Construction plays a critical role in driving economic growth, right across London. From workplaces and critical infrastructure projects such as upgrades to the London Underground network, to the new homes for the London of the future, a world class city like London must have a first class construction sector that is able to support its development and growth. London itself is home to a number of internationally renowned architects and headquarters of construction companies operating across the globe. It has showcased the very best of UK construction and design with internationally renowned buildings and infrastructure.

Any policy changes to how smart roads are developed and charged, must incorporate and recognise the existing policy infrastructure and how it is already impacting on the London business community. If London is to remain a viable and attractive place for the construction industry to operate in and invest, then we must find a balance between existing policies and ensuring construction and especially plant-hire companies, can operate for their clients and customers.

The construction plant-hire industry recognises its role in reducing emissions while operating in a highly competitive sector

The UK's construction plant-hire industry is the most professional in the world. The essential sector in the wider construction industry, plant-hire encompasses a range of specialist technologies, skillsets and areas of emerging innovation and development. The sector played a critical role in supporting London through the pandemic, working through the emergency by continuing its vital work in supporting infrastructure development, and building the homes and workplaces we need for

now and in the future.

Over the course of the last three years, the UK's construction plant-hire sector has shown itself to be remarkably resilient in the face of a range of well documented factors, working for clients and playing its part in driving growth in the construction sector. Equally, the sector recognises its role in reducing emissions and ensuring new technologies and innovations in engine technology, are part of the future as we move towards a net-zero economy. Over the course of the last thirty years, manufacturers and the wider construction industry, working with legislators at both national and international level, have taken steps to reduce construction's impact on the environment. As we move towards a net-zero future and decarbonisation, developments in electric charging, battery technology and hydrogen as an alternative fuel, provides a degree of direction and insight into the diesel alternative for construction plant.

However, while starting the process of decarbonisation, we need to find a balance. It is vital that the sector remains competitive. The Mayor of London recognises this himself through the Mayor's Construction Academy, an initiative that rightly looks to address the skills shortage that already exists in London construction. The steps needed to address are welcome and something that should be applauded. However, this is only part of the challenge. Without construction plant, construction activity is not possible. The success of our sector in London has come at a cost. The wider economic environment has tested the resilience of the sector, with increased fuel prices, machinery shortages and inflation forcing companies to make difficult choices in how they operate and plan for the future.

Any changes and implementations around a future smart road charging scheme, must recognise the challenges construction is already facing. Failure to do so, will undermine the competitiveness of our sector, and hinder ongoing and future construction and infrastructure projects in London.

London already operates a range of schemes and charges that are acting to reduce congestion and improve air quality – we need balance and consolidation in the future – both at a local and regional level.

Within both central London and the surrounding boroughs, a series of schemes and initiatives are in operation. These have been developed and implemented over the course of the last 20 years. With their implementation, over the course of this time period, these schemes have added a degree of complexity and bureaucracy to companies doing business. Currently, companies have to cover:

- London Lorry Control Scheme
- Congestion Charge
- LEZ
- ULEZ (which is set to expand to encompass the whole of the London region).

Each of these schemes has had an impact on businesses operating in and around London, and while they have adapted and evolved operations to meet the requirements, future changes and proposals need balance and proportionality. For example, if smart roads become a reality and a charging scheme comes into effect, then flexibility is needed. If deliveries or traffic movements are at points when congestion and emissions are lower, then a reduced charge should be applied to reflect this. We have seen how during the London 2012 Olympic Games, schemes already in operation such as the London Lorry Control Scheme, was modified to ensure previously excluded routes were allocated, together with earlier and later planned deliveries, so that local businesses and their customers still had their supply needs met, with minimal impact – whether from emissions or noise - to local communities. This temporary modification was viewed as very successful by local

authorities, communities, businesses and industry. Lessons learnt from that time need to be revisited and where applicable, be re-introduced at the earliest opportunity, as we look to the future.

A debate is needed to identify how a UK wide emission scheme could come into effect. Currently there are too many inconsistencies in the approach cities and local authorities are taking.

Future emission charging schemes should be consistent in their application, with a national debate needed on what constitutes a proportionate response to dealing with the issue. We have already seen a range of different cities, town and local areas, all looking to develop their own clean air zones and emission control. This makes it increasingly harder for companies operating on both a national and local level to deal with. If the Transport Committee is looking at whether London should be an outlier for a national smart road user charging scheme, then the same should apply for emissions and dealing with air pollution. While recognising that there are unique pressures and challenges in each region that is dealing with air quality, we need to look at how we can implement a scheme at a national level that works for those areas dealing with the issue of emissions and improving air quality.

The current picture and approach to low emission zones on a national level is complicated and inconsistent and will undermine confidence in how future schemes are developed. This will hinder future business investment at a time when economic growth remains weak. If the Transport Committee is to make any recommendations, then working in collaboration with businesses and those industries more likely to be affected, i.e., construction and logistics, is vital. We cannot see policy being implemented with at least some clear recognition that incorporates the needs of our members. Clear sign posting that helps the construction plant-hire and logistics industry navigate such schemes is needed.

As engine technology changes and evolves, improvements in measuring air quality and accurate levels of air pollution have also changed. This is important moving forwards. Already internationally, we have seen systems that are adaptable, whereby if air pollution levels are high on one day, then a higher charge pollution charge can be applied to higher polluting vehicles. Conversely, if levels are low, then a reduced charge should be considered and implemented, proportionate to the air quality on that day.

This measure can also apply to smart road charging and different levels of congestion. When traffic levels are high, then a different charge should apply against days or times when levels are low. Construction traffic, especially in cities like London, deliver on a just in time basis, when materials and equipment are needed on a construction site on the day they are to be used. We need to see trials and clear communication with business users as part of any future policy planning.

The needs of the construction industry must be incorporated into future plans and developments on how London uses its road network

Looking at how London deals with the challenges of decarbonisation, congestion and improving air quality is a challenge that involves everyone – from the people who live there, work there and use its roads on a daily or infrequent basis, for both leisure and work. Addressing these challenges will take time, with collaboration, flexibility and understanding, critical in moving forwards.

Construction is a key part of both driving growth through building new homes, critical infrastructure and work places, while also contributing to road traffic and daily transport movements. Finding a balance that ensures construction plays its role in London, without being excessively penalised for going about its daily activity, is vital. Plant-hire members recognise their part in reducing decarbonisation and their role in contributing to London's traffic. However, this is done, we urge

policymakers to work with us and our members to find solutions that work for London and its business community, identify best practice, simplify existing processes and act as an example for other schemes in operation across the UK.

March 2023

Response from: Alliance of British Drivers

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Reference	RUC2683

Response to the Greater London Authority's call for evidence on the proposals for Road Pricing from the Alliance of British Drivers

The Alliance of British Drivers (ABD) response to the Greater London Authority's call for evidence into its proposals for road pricing is attached below.

The ABD is a membership based organisation which is wholly independent of any political or funding agencies and is therefore able to provide valued and balanced analysis on all issues relating to personal road transport ranging from manufacturing decisions, local government initiatives and national policy.

Our unbiased focus on the impact of policy decisions has proved to be prescient concerning the impact and consequences of a wide variety of transport related schemes over the last two decades. For example, our study into the probable adverse repercussions of the move to *smart motorways* some fifteen years ago proved to be entirely accurate.

Our response to the GLA's call for evidence concerning *road pricing* is based on extensive research and analysis of the impact of such schemes in both successfully addressing the issues it is planned to ameliorate as well as the consequences for transport generally and the private motorist particularly.

The ABD is aware that the composition of the GLA Transport Committee is dominated by those who voted on the 17th of November 2022 for the paving measure amending the Mayors transport strategy. This was despite the overwhelming evidence that the ULEZ expansion and road pricing proposals are seriously flawed and do not enjoy public support. 83% of free-format comments on road pricing were against the proposals yet these have been ignored by the committee.

We are therefore concerned as to the objectivity of the Committee and we see this as a serious impediment in arriving at a widely acceptable, justifiable and sustainable outcome to this consultation. We are additionally concerned that a decision to proceed with the road pricing proposals will be taken regardless of the outcome of this consultation. We further note that the GLA has employed staff to implement the road pricing scheme. This gives a clear indication that the decision to proceed has been taken, rendering this consultation void.

We are further concerned that the expectations embodied in the Gunning Principles may not be met in the short period that has been set aside for the consultation. This is coupled with the failure of the 2022 road pricing, ULEZ and MTS consultation to reach individuals that would be disadvantaged by the proposals. We do not consider this to be an equitable approach to consulting with the electorate.

It is therefore our considered opinion that this consultation could be a little more than a "tick box" exercise. It would appear that the GLA's Transport Committee has probably already arrived at a decision in favour of the proposals that disregards a significant number of objections and an overwhelming refutation of the plans.

The ABD's response to the thirteen questions within the consultation follow overleaf.

The ABD's Response to Questions Raised by the Consultation:

1. Do the current road user charging systems in London require reform?

The ABD is unable to identify a precise road user charging system in London because the current system does not include a distance element.

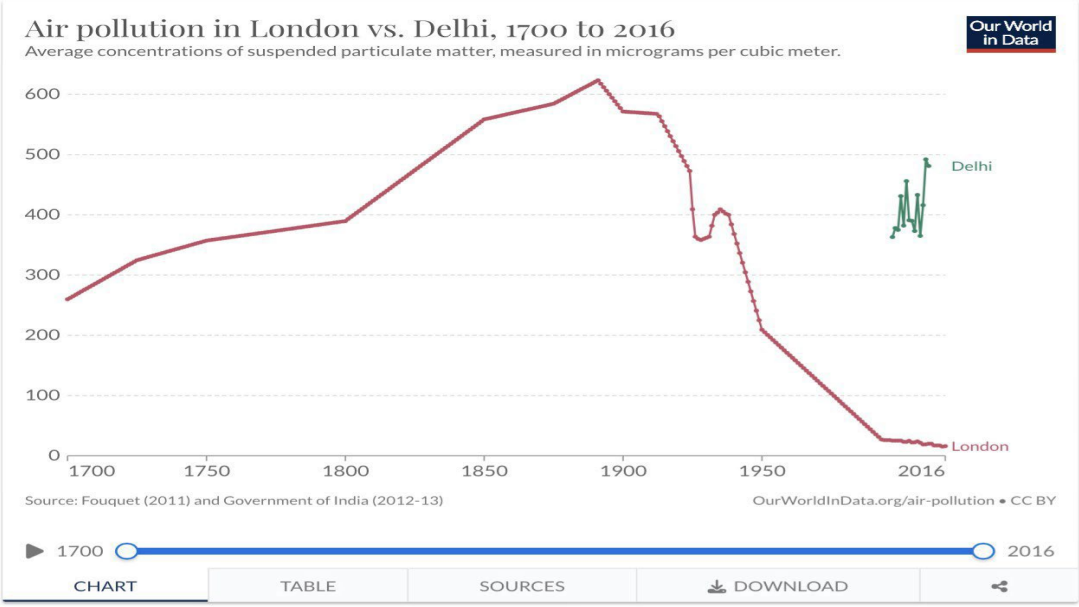
The current scheme is based on penalty or access charges. Neither of these constitute a proper road pricing scheme as it is impossible to quantify the scale of journeys undertaken that would attract a charge under the GLA proposals.

The initial so-called "congestion charge" operates as a *movement charge* within a specified geographical zone at specified times. This has latterly evolved into a blanket charge, levied at all times, and has therefore ceased to be a *congestion charge* in the accepted understanding of such a scheme. This has rendered the existing *congestion charge* to be an access charge which is a highly regressive form of taxation that offers no differentiation between vehicles in spite of the weight, distance travelled, occupancy, purpose of the journey or the ability to pay.

The second element of concern is that the proposed road pricing measures and the ULEZ scheme are, in part, based on addressing air quality within the capital using entirely erroneous estimations of the purported problem.

The reality is that the vast majority of the improvements in London's air quality does not arise from either the ULEZ in its current geographical spread, nor will its expansion or road pricing contribute to improvements in air quality. This is because London's air quality has been improved over the last 60 years by the progress in technology and legislative measures which have eliminated the vast majority of pollutants. Road-based transport that is targeted by the proposed road pricing scheme contributes a vastly diminished impact on the Capitals environment. There are far greater and more impactful issues concerning air quality that should focus the attention of the GLA such as the extraordinary pollution from the London underground, and from the simple activities of daily living, such as cooking in an enclosed home environment.

The graph below illustrates beyond all doubt that Londons air pollution levels are as near to the naturally occurring background levels as you would find even in the Amazon jungle, that is to say that persistent particulate intrusion into the Capitals atmosphere is all but zero.



However, the imprecision of this question is a matter of concern to the ABD and the electorate who routinely discuss issues of this nature with us in person and in our meetings with various local community representatives.

The ABD position is that the current road user charging system is unfit for purpose and the proposals for more elaborate schemes, such as both the ULEZ and road pricing are a disproportionate and inequitable set of measures. The proposed scheme will have a significantly damaging impact on families, trade, commerce, and the more vulnerable elements of society, such as single mothers, the handicapped or disabled, ethnic minorities and the elderly. The Jacobs consultancy response to the Mayors ULEZ proposals is unequivocal in listing these elements of the population as being at immediate risk from the proposed measures. This is unconscionable.

We cannot possibly support a battery of measures which actively discriminates against readily identifiable and vulnerable sectors of society.

The ABD strongly recommend that the GLA set aside any proposals for further regressive taxation on the population of London. The scheme is inequitable, unfair and unjustified on any moral, ethical or operational basis. The costs of providing the infrastructure and implementation of the scheme is wholly disproportionate to any advantage that may accrue to the population of the capital using any rational or coherent measure.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

The ABD wholly reject the premise that road charging is under any guise a requirement for driving in London.

Taxation is a national prerogative in the same way that MoT standards, fuel duty and VAT are set. London is not a separate jurisdiction, despite a measure of devolution. Vehicles that have passed statutory requirements, such as an MoT indicates that they are entirely compliant with prevailing legislation and therefore there is no reason why a local authority should deny access to any road or impose additional taxes.

The proposals for road pricing and the associated ULEZ are an entirely regressive taxation that has no relevance in addressing the purported issues that confront the GLA or Transport for London.

Discriminating against certain vehicle types and their users is not accepted by the ABD membership, or the electorate, with whom we have consulted on numerous occasions concerning ULEZ, LTNs, CAZ and road pricing.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

The idea that there are “good“ and “bad“ journeys at the discretion of the GLA is wholly unacceptable as it is both discriminatory and illogical. The ABD considers this to be politicisation of what should be an inalienable right to freedom of movement and association.

The attempt to differentiate between the nature and purpose of journeys is to introduce a level of inconsistency, discontinuity and infringement of basic rights of the population of London for what can only be assumed are political ends. The intrusiveness and invasion of privacy that is a key

component of the scheme, further renders the proposals as being unjustified and disproportionate.

The authority to make decisions on what constitutes an “essential“ worker and by implication “non-essential“ workers, and their travelling arrangements is to introduce a level of authoritarianism into the daily workings of a local council, which is inordinately disproportionate to the core functions and responsibilities which are expected of a rational Council by the electorate.

To assume the right to adjudicate as to what is a justifiable journey, and therefore a “responsible journey” is to take yet another step towards an authoritarian disposition of a local council that cannot be justified in a democratic society.

The ABD lacks confidence in any local authority having the competence, manpower and focus sufficient to operate a system that assesses and approves the utility and value of any journey, whilst assigning what is, in effect, a penalty charge. Of considerable concern is the on-costs of the inevitable bureaucracy that such a scheme will generate that will add even more layers of complexity and cash absorbing rules and regulations.

The ABD strongly rejects the idea that road pricing has any justification and considers that attempts to vary charges based on entirely politicised and subjective criteria are wholly incompatible with a democratic society and betray the motivations of those intent on implementing such a scheme.

4. What strategies and targets could smarter road user charging support?

The ABD considers that the costs of the infrastructure, monitoring costs, charging systems and penalty levies are wholly disproportionate to any advantage that may accrue from such a system. The extensive investment requirements to implement the scheme would be far better deployed in social care, protection of vulnerable elements of society and civil society infrastructure.

For road pricing to be effective it has to be absolutely cost neutral and it is not clear from the GLAs documentation that there is a recognition of the difference between “revenue neutral” and “cost neutral” taxes. It is clear that the scheme as proposed cannot possibly be a cost neutral tax.

The ABD and its members can not determine that there are any strategies and targets that smarter road user charging can support. Target-chasing inevitably leads to incentivising perverse outcomes and inevitably does more harm than good. Target-monitoring is costly and effort should instead be put into quality of urban design to free up road space and ease congestion.

British drivers already pay £50 billion in various forms of tax yet only £10 billion is assigned to roads, meaning that there is a significant subsidy to other government spending streams. To extract further taxes from drivers to overcome the GLA’s shortfall in income is inequitable and unjustifiable.

The ABD considers that the costs of implementing the scheme and retrieving fees is an expense that is wholly unnecessary: the fuel duty system has the advantage that it is easy and cheap to collect because this is undertaken by fuel distributors and is almost impossible to avoid. We suggest that motorist pay sufficient taxes through fuel duty and the added VAT and that exposure to further taxation is both inequitable and regressive.

In addition, any road user charging system that involves use of ANPR, cameras and digital tracking will require extensive investment in infrastructure costs to which the operational costs will need to be added before any taxes extracted from drivers can provide a source of revenue. It is evident that insufficient consideration has been given by the GLA to such considerations.

The ABD and a wide swathe of the electorate view the road pricing proposals as part of a political and ideological strategy to remove some 27% of car journeys from roads by the year 2030. This is a key factor within the *Element Energy* report of 2022. The idea that vehicle ownership and use is a legitimate target for political ideology is absolutely rejected by the ABD and its supporters. This objective is punitive and ill-conceived and constitutes an all out assault on the legitimate pursuits of the freedom of movement, travel and association which is antidemocratic and entirely unnecessary.

The ABD supporters contend that the road pricing proposals are no more than a cash gouging enterprise. There is not any basis for road pricing borne out in the science of atmospheric chemistry as there is not any toxic pollution in London as illustrated in the graph above.

Further claims that road pricing will ameliorate traffic congestion is equally unfounded. It is axiomatic that traffic congestion is a direct consequence of the closure of significant tracts of road space which are converted for the sole use of cyclists and bus transport. These facilities and the road space they occupy are significantly under-utilised. The volume of under-utilised eight ton double-decker buses in convoys on our roads is a material contribution to congestion in the remaining road space.

5. What technology could be used to support smarter road user charging?

The Mayor of London commissioned the Jacobs Consultancy to analyse the impact of the ULEZ scheme and their report concluded that it was necessary to deploy road cameras and the automatic numberplate recognition system for the purposes of road pricing. The Jacobs report made it clear that the ULEZ expansion to Greater London offered very little to the population of London and that it would have a particularly damaging effect on ethnic minorities, single parents, the elderly and disabled. The same analysis applies to the road pricing proposals, which can only be of benefit as a revenue generator for the GLA and Transport for London: there is no other valid reason for the implementation of this additional taxation on London's road users.

The costs of acquisition, installation and operation of the charging system will require a capital investment in excess of an estimated £240 million. These expenditures are not sunk costs, but incremental costs, that are being incurred now, on the assumption that a road pricing scheme is going to be implemented regardless. Based on this assumption, the validity and relevance of this consultation is called into question simply because the investment program has already commenced on the basis that implementation of road pricing is an established course of action that will not be amended as a consequence of this consultation.

We further understand that there are some 90 members of staff already working on designing road pricing schemes. We are extremely concerned that £5-£10million per year is being spent even while the ULEZ expansion is under both political and judicial threat.

The use of the technology required for the road pricing scheme has clear implications for civil liberties and substantial privacy concerns, whether inside or outside of a vehicle.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

The ABD rejects this premise and we address each of the three noted clauses in this question as follows:

Traffic: Much of the policy of TfL over the past several years has been to the detriment of effective traffic management and has been the actual cause of additional congestion. This has been achieved through the introduction of cycle lanes, bus lanes, LTN's, road narrowing and traffic light phasing. This has resulted in the incremental removal of significant tranches of road space and capacity reduction which is the substantive cause of considerable volumes of traffic congestion for scant advantage for most of the time.

Air Pollution: The air in London is cleaner now than at any point since at least the year 1700 AD, as illustrated in the graph above. Reference to the possibility that there have been "40,000 deaths" or "4000 deaths in London" per annum are entirely erroneous. Scientific examination of this claim shows beyond any doubt that assertions of this nature are at best ill-conceived, and at worst outright fraudulent. That fraud is committed every time the claim is repeated. Academic assessment by Cambridge University of this claim has shown unequivocally that it is a "guesstimate" at best, and has no foundation in either the science of atmospheric chemistry, or the science of mathematics. The "guesstimate" is founded on the *possibility* that pollution generically could *in extremis* have a negative impact of a few minutes per person over the entire duration of their life. This has been extrapolated across the entire population and aggregated into a mathematical equation that these few minutes per person could possibly, maybe, might sometime add up to a theoretical number of premature deaths across the entire population. This theoretical algorithmic conclusion is no more than a vague expression of a remote possibility. There is no scientific evidence that demonstrates any causal link between air pollution from road transport let alone any single death. Not even the tragic case of a young girl in London which has been used continually to substantiate claims of the lethal effects of air pollution. This unfortunate incident has not been supported by real scientific investigation where it has proved impossible to attribute to pollution. The ABD calls on the GLA transport committee to desist from reiterating this misinformation, and to set the record straight concerning the scientific basis for the health impacts of air pollution, which do not support the claims made in the road pricing documentation or the ULEZ proposals.

Climate Change: This is a further example where a false narrative has been used to justify the GLA's proposed road pricing regime. The Mayor and the GLA have based their erroneous claims of 'climate change' on cherry picked statements included in reports known as the "Summary to Policymakers" issued by the Intergovernmental Panel on Climate Change. These reports are produced by government appointed bureaucrats to overwrite the actual scientific statements made in the main body of IPCC reports by qualified scientists if those conclusions differ from the political narrative. Several scientists have spoken out about these transgressions to no avail. A few hours study would illustrate that many of the statements contained in the "Summary to Policymakers" issued by the IPCC are wholly without foundation when compared to the substantive documents written by qualified scientists that are contained in the IPCC's main report and which are not referenced in the "Summary". However, for the purposes of this consultation we will accept the premise that climate change is caused by anthropogenic based emissions of CO_2. Based on this erroneous presumption, we would note that UK emissions are 1% of the total global man made emissions. London emissions are very approximately 8% of the UK total CO_2 output. Natural emissions of CO_2 are thirty times those that are man made. A doubling of CO_2 from the current levels of 420 parts per million to over 800 ppm could *possibly* raise the global temperature by very approximately 1°C *at the most*. If all the internal combustion powered vehicles were removed from the roads of London this would have an effect of 0.00027

degrees C. The costs of achieving this theoretical and microscopically small variation in global temperatures will run into billions of pounds that will have to be levied against the citizens of London. However, this can only be achieved if *all* CO_2 emitting forms of transport including buses, underground, rail and commercial vehicles are completely removed from London. If the committee, as we suspect, believes that the use of Zero Emission Vehicles would be acceptable then we need to advise the committee that based on a *Cradle to Grave* report which the ABD has been working on for over 12 months using verified, scientific reports and data demonstrates that EV's do not have any tangible or realistic advantage over an internal combustion powered vehicle. This technical analysis is based on an assessment of a lifetimes output of CO_2 starting from the extraction of raw materials to the point at which the vehicle is recycled. When other considerations are included such as resource consumption or human impact in the Global South, the EV comes off objectively even worse.

In summary, 'smarter' road user charging cannot assist with tackling current challenges such as traffic, air pollution and climate change. Instead better quality road design is needed, along with reduced charges and support for local enterprises. Taxation and charges resolves nothing.

The ABD suggests that the transport committee reevaluate and reassess the basis upon which these claims and proposals have been made.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

Any road pricing scheme based on regional locations has the potential to create confusion and conflicting criteria that would introduce considerable disruption to the effective use of road transport in commerce, public transport, emergency services, and private mobility across the country. It is already clear that the plethora of different schemes, eligibility, charging basis and methods is becoming far too complex to be comprehendible to the typical road user. We suspect that this complexity will prove to be beyond the sustainable capacity of local authorities to supervise effectively.

Unnecessary complexity should not be a barrier to freedom of movement.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

The present tax system has two broad components**:** a fixed element which permits access to the roads, that is *car tax*. While this was initially largely a flat rate, changes since 2001 have introduced an ever increasing element of, in effect, penalty charges into the pricing of car tax.

The second component is a usage charge, where the tax paid is based on the distance travelled as levied by fuel taxes. The administrative complications and costs of differential charging for car tax between London cars and other communities across the rest of the UK would be a misuse of public funds and would likely render the system inoperable in part because the operational interface would be profoundly difficult and expensive to maintain. The lessons learned from the debacle over the NHS-Spine IT system would be a formative experience for aspiring systems engineers intent on implementing a battery of inter-dependent and inter-functional processes such as would be required for the road pricing scheme. The principal lesson from a 'users perspective' would be "don't".

The ABD does not think that road user charging has merit in its own right as it will be an additional tax. The GLA is not in a position to replace any other taxes that are levied on a national basis. Therefore the premise of this question lacks any meaningful purpose.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

This appears to be a further example of the current approach by local authorities to overcomplicate policy by selecting certain user groups for special or favourable treatment. The existing national discounts for disabled people are sufficient to address the needs of this group without further complexity or interference by a subordinate authority.

Decisions concerning the right to travel or that “travel for work” is necessary and fulfils some arbitrary criteria, decided upon by a local authority with vested interests, is unjustifiable and contravenes all reasonable measures of civil liberties and personal privacy. The justification for travelling to work - or anywhere else - must be at the absolute discretion of the individual who makes the journey. Firstly this should not be the legitimate business of the council, and secondly it is an affront to personal liberty to have to justify to some bureaucracy that a journey is necessary, as was the case in east European jurisdictions up until 1990.

As to discounts for those on low incomes, we would reject any system where income tax records became available to TfL so that preferential or punitive pricing could be applied. There is sufficient complexity in the income tax system, where every adjustment creates a fresh cluster of disadvantaged people.

By the very nature of this question, the committee has illustrated and accepted that the road pricing scheme will, by definition, have injurious consequences for disabled people, those on low incomes, those who need to drive for work or people who live in areas with low levels of public transport.

Further justification for abandoning this ill-conceived and misjudged proposal is therefore not necessary.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Not under any conceivable circumstances would London be a “sensible” test bed for a scheme that is actively against the interests of the electorate or the effective functioning of the capital as the economic nucleus of the UK.

Although London is not a different country, in practice the needs, availability and use of private cars and public transport are radically different for the capital.

The ABD consider that London would be the worst possible place to attempt a trial of such an ill-conceived and deleterious experiment.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

The ABD supports fiscal neutrality. Fuel duty has exceeded the social cost of vehicle use for decades and regardless of motive power the social costs remain largely the same. Consequently any changes to the taxation system should result in a reduction in the tax take from drivers.

For reference, total revenues through fuel duty, VAT and road tax amount to approximately £50bn *per annum*. From this disproportionate tax-take less than £10bn is invested back into road infrastructure. This demonstrates beyond all doubt that the UK political system routinely and regularly treats vehicle ownership and use as nothing more than a cash cow that can be milked at every turn on the whim of bureaucrats and politicians.

There is not a rational case to be made for anything other than reducing the gross tax-take from the motoring public, trade, commerce and services. Over half the population have access to and use private vehicles for very good reason. There are 37 million drivers in the UK and they pay more than their tithe for the inalienable right to freedom of travel on roads that they have paid for six times over *per annum*.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

The ABD considers that a fully informed democratic process should be a fundamental right so that the electorate can sanction the use of powers in issues of such impact that they will affect every aspect of community life. Such powers as exist are there for the benefit of the community, not to fulfil the ideological and political preferences of an executive.

The mechanism through which these powers have been granted have been beyond the reach of the democratic franchise and have been achieved without full democratic participation**:** that is to say *nobody voted for this*. The recent consultation on the ULEZ has demonstrated that the voters of London do not support such schemes, and from our own surveys we have prima facie evidence that the levels of objection are far higher in the rest of the country, most notably in metropolitan conurbations. Yet those objections have been ignored and over 5,500 have been disallowed for entirely political ends.

On the recent past performance of the Mayor, the GLA and TfL concerning the ULEZ consultation, the ABD, its members and a wide range of peer groups have lost all confidence in these ‘authorities’ ability to run a referendum after the manifest bias in the previous ULEZ consultation.

The vast majority of people that the ABD has discussed these issues with across a spectrum of London boroughs has been unaware that the road pricing consultation was taking place. The ABD considers that the failure to widely advertise the consultation is an abuse of the powers granted to the GLA. It has been suggested in some quarters that the GLA have conducted the consultation in this way for particular reasons which exacerbates the contention that there can be scant confidence in the GLA to act responsibly in such matters.

In a democracy, the views of the voting public should not be disregarded by elected members or council officers when the result is not in keeping with the ideological or policy decisions already arrived at within the closeted environment of party political machinations. The best disinfectant

for aberrant and perverse politicised decisions is open discussions with full disclosure. What is there to hide?

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

As an indirect comparison, documented experience in the USA shows toll roads are avoided for reasons of cost and in the UK this has been mirrored with the M6T in the Midlands.

Early experience of the congestion charge in a number of jurisdictions shows that the economically disadvantaged within the congestion charge zone receive less visits, where both social contact and well-being are adversely impacted. This has been illustrated in the Jacobs Consultancy analysis of the Mayors ULEZ proposals that demonstrate that disadvantaged groups are disproportionately and adversely impacted by the proposed scheme.

Furthermore, road pricing would cause a displacement of economic activity to outside Greater London. Adding extra costs to trade, deliveries, taxi fares and personal transport will increase cost-of-living pressures on consumers, trade-and-industry, non-drivers as well as drivers.

We note that the Mayor of London is the Chair of an international organisation, funded by foreign interests, that are intent on introducing control measures on the publics right to travel at will in a number of jurisdictions. We consider this to be a material part of the move to introduce punitive levies on Londoners that are counter to the interests of the electorate and the national well-being. Any undue pressure to comply with this internationalist agenda is incompatible with the security and well-being of Londoners and should be abandoned forthwith.

Conclusions

There is very little support for the harmful and malignant proposals to introduce road pricing into London. The deleterious impact of these proposals will far outweigh any conceivable benefit. We advise the GLA to desist from embarking on a scheme that will wreak far more harm than any possible benefit.

Response from: Campaign for Better Transport

Reference	RUC3125

The future of smart road user charging

Campaign for Better Transport response to London Assembly Transport Committee Call for Evidence

10th March 2023

About us

Campaign for Better Transport is the national charity championing greener, fairer transport solutions. Our vision is for all communities to have access to high quality, sustainable transport that meets their needs, improves quality of life and protects the environment.

Summary

Campaign for Better Transport supports the future introduction of smart road user charging. With the number and geographical coverage of the various road user charging schemes in London due to grow, there is increasing complexity for drivers. These are also mostly cordon-based with a set daily charge that drivers pay regardless of how much they drive, which is unfair on many people driving shorter distances. Replacing the current schemes with a distance-based smart road user charging scheme (pay-as-you-drive) would be simpler and fairer for drivers.

In 2022, we commissioned Public First to conducted a representative survey of 3,011 UK adults, including 434 Londoners. This was carried out in May 2022 and asked respondents about their driving habits and their views on reform of vehicle taxation, moving to pay-as-you-drive and how a national scheme could integrate with local schemes. We also commissioned a number of focus groups The data and findings quoted in this response come from this research. The full report can be found here.

Below we respond to call for evidence questions in detail.

1. **Do the current road user charging systems in London require reform?**

Yes. Since the introduction of the Congestion Charge in 2003, the system of road user charging in London has become increasingly complicated. There is the Low Emission Zone, then the introduction of the Ultra Low Emission Zone (ULEZ), its subsequent expansion to Inner London and planned expansion to Outer London. There is also the Dartford Crossing charge and tolls planned for the Blackwall Tunnel and the new Silvertown tunnel. All these scheme have different objectives, requirements, charge levels and operating hours, making it is increasingly complex for drivers to navigate.

In addition, the Congestion Charge and the ULEZ are both cordon-based, charging drivers a set daily charge for entering and driving within the respective zones, regardless of how much they drive. This is unfair on individuals making shorter or unavoidable journeys. Set daily charges do not take into account the impact of individual journey or the availability of public transport alternatives and are too blunt a method for tackling congestion and air pollution.

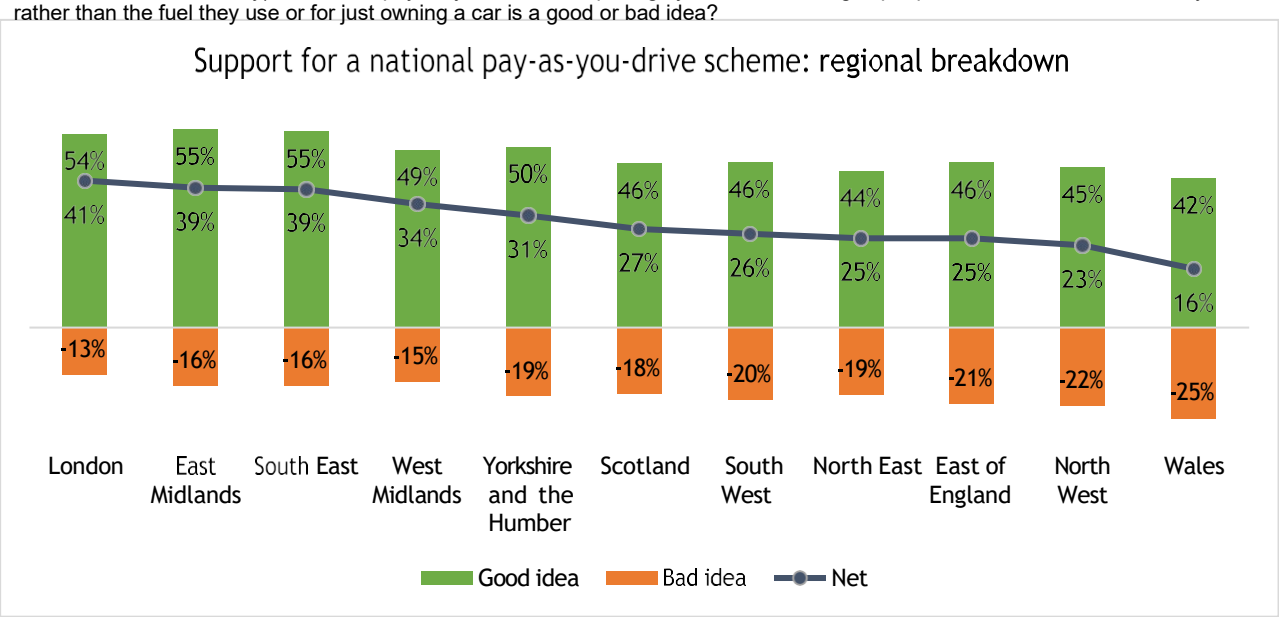
2. How might smarter road user charging differ from the current daily charges for driving applied in London?

A smart pay-as-you-drive scheme would charge drivers per mile and it would vary the rate according to the type of vehicle and how polluting it is and the alternatives available for making that journey by walking, cycling or public transport. Other variables like time of day, day if the week and average congestion on a given road could be added. For example, if you are driving in a cleaner vehicle and/or in an area that has fewer alternatives to driving or at times when these alternatives are unavailable, you would pay less than if you are driving in a more polluting vehicle and/or in areas and times with dense public transport provision. This then reflects the true impact of individual vehicle journeys more accurately, making it a much fairer system than the current schemes.

Replacing the current range of blunt set daily charges (the Congestion Charge, ULEZ and other road user charging schemes) in London with a single pay-as-you-drive charge accounting for both congestion and pollution would be simpler for drivers to understand and to administer. Varying the charge according to when and where the actual journey takes place is the most effective way of making the system fair to people who have few alternatives to driving, and does not unduly penalise people needing to make essential short journeys.

Our survey showed Londoners are less likely to own a car (70% compared to 78% among all respondents) and more likely to drive less than 1,000 miles a year (19% compared to 13% among all respondents). London was also the region with the highest levels of support for pay-as-you-drive (at the national level), with 54% of London respondent in favour and only 13% opposed.

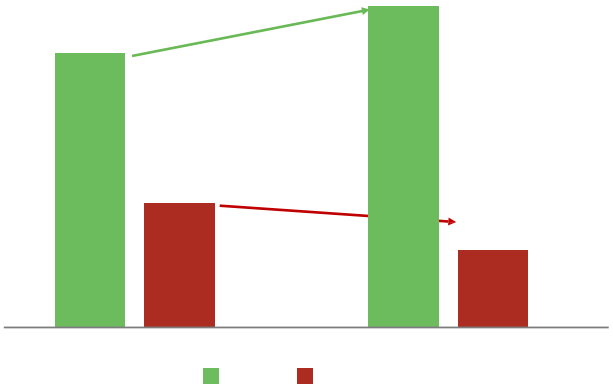
Q: Given what you've read and understood from this survey, do you think replacing the current system of vehicle taxation (fuel duty and car tax/vehicle excise duty) with a new pay-as-you-drive/road pricing system which charges people based on the distance they travel, rather than the fuel they use or for just owning a car is a good or bad idea?



The lack availability of alternatives was the main concern for people at the start of the survey. However, once the arguments for and against reform and different implementation options were discussed, support increased while opposition declined. This demonstrates the need to meaningfully engage Londoners in the discussion and design of a pay-as-you-drive scheme from the start to improve understanding of the benefits and mitigation options.

Q1 (at the start): In general, would you support or oppose replacing fuel duty and car tax/VED with a pay-as-you-drive system?

Q2 (at the end): Given what you've read and understood from this survey, do you think replacing the current system of vehicle taxation (fuel duty and car tax/vehicle excise duty) with a new pay-as-you-drive/road pricing system which charges people based on the distance they travel, rather than the fuel they use or for just owning a car is a good or bad idea?



Londoners also support the principle of polluter pays and being charged on the basis of distance rather than a set daily charge, as more than three in five (62%) find the argument that any new system should "reward people who drive less leading to less congestion and cleaner air" convincing (compared to 22% who find it unconvincing).

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

A smart pay-as-you-drive charge can vary by vehicle type and emissions and by location by using a GPS device in the car. However, varying every journey on the basis of purpose would be more difficult to determine, unless the driver inputs the purpose for every journey through an app. Instead, we suggest a range of mitigations for specific groups in society. The system must be fair on different types of drivers, including those on low incomes who cannot afford to pay additional charges or those who have no choice but to drive, either because there are few viable alternatives or because their livelihoods depend on driving. There are a range of mitigations that can be deployed, such as reduced rates, exemptions or higher free mileage allowances for key workers, people on low incomes, or sole traders. The idea of reduced rates or higher allowances for designated key workers makes Londoners 62% more supportive of a pay-as-you-drive scheme.

4. What strategies and targets could smarter road user charging support?

Our research found Londoners are significantly more concerned about congestion and air pollution (43% and 39% respectively) than the general public (37% and 27% respectively).

By charging directly per mile driven and encouraging less car use, a well-designed pay-as-you-drive system has the potential to address a number of the challenges including:

- Reducing air pollution
- Reducing greenhouse gas emissions
- Reducing congestion
- Improving health and well-being

This would support the targets of the Mayor's Transport Strategy and net zero ambitions. Smart road user charging would also be a comprehensive solution addressing the downsides in the current system, delivering social equity, and helping to deliver these outcomes.

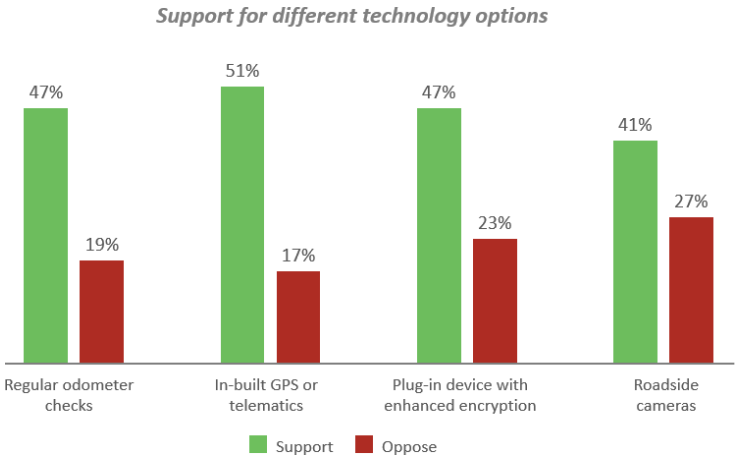
While any charge should be proportionate to tackling congestion and pollution, any surplus revenue from pay-as-you-drive should be used to fund public transport in London and improving connectivity in areas where this is currently low. Indeed, our survey found making public transport cheaper and improving connectivity are the top measures to improve fairness that would make Londoners more supportive of the scheme.

Reducing traffic by rewarding those who drive less will also improve bus journey times and encourage more active travel. With the resultant reduction in car dependence, new housing developments can be designed around active and sustainable forms of transport. Increased investment in public transport will increase access to new homes and jobs for those how cannot currently afford a private car.

5. What technology could be used to support smarter road user charging?

There are a range of technology options depending on the scheme design chosen. It would be possible to charge drivers a set per-mile charge, with the rate only variable by vehicle emissions which is determined at the time of registering it for the scheme. This would not require tracking the vehicle's location, only its mileage, which can be recorded periodically at the annual MOT or monthly checks.

On the other hand, a fully variable pay-as-you-drive scheme which accounts for location too would require vehicle tracking. It could have a standard per-mile rate based on vehicle emission rates with top-up for different types of roads and locations. A plug-in GPS device or in-built telematics could then determine the rate on the basis of Public Transport Accessibility Level (PTAL) scores, or availability of alternatives can more simply be reflected in a zonal system for central, inner and outer London, or the existing travelcard zones. This would be more predictable and easy to understand by drivers. This system of road pricing system would most fairly reflect the impact of actual journeys and should be the option to work towards in the longer term.



Previously, plans to introduce road pricing have failed because of objections by campaign groups on the grounds that people would prefer not to be tracked and that doing so would infringe on their

privacy. However, our research showed that both the MOT system of reviewing mileage and the in-vehicle tracking are equally popular. In addition, smart apps and ticketing are now much more widespread. People trust Transport for London with data when using Oyster and contactless cards on the tube and buses, so a road user charging system with appropriate data safeguards and enhanced encryption should not face opposition.

Nevertheless, it is important to provide an alternative for people objecting to distance-based charging on privacy or other grounds. One option is having the opportunity to opt out of a variable per-mile charge and instead pay a fixed monthly charge. This would be set at an above-average user rate, in a similar fashion to being charged the maximum fare if you forget to tap out your Oyster at the end of a journey. In our survey, 47% of Londoners said "being able to opt out of pay-as-you-drive and instead pay a set annual tax (even if that might be higher than the pay-as-you-drive charge)" would make them more supportive of the scheme.

6. **How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?**

Evidence from our focus groups reveals that drivers are much more likely to think and reconsider their need to drive if the costs involved are clear and obvious. Therefore, a simple, transparent system of charging would encourage people to drive less, either rethinking or combining journeys or choosing other modes of travel. This in turn, combined with improvements in public transport, will result in less traffic, improved air quality, and contribute to achieving the London's net zero target.

We found that Londoners are much more supportive of local road user charging scheme that address congestion and pollution than respondents overall (+40% net support in London compared to +26% overall). The main reasons for support are having a nicer environment for people from fewer cars and a concern about the health impact of air pollution. The main reasons for opposition are concerns about the impact on people who need to drive and that they may increase traffic elsewhere – which could be tackled through mitigations and investment in public transport.

7. **Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?**

With the transition to zero emission vehicles, revenue from fuel duty is projected to decline significantly in the near future. Campaign for Better Transport's report published in September 2022 made the case for replacing current vehicle taxation with a national pay-as-you-drive scheme. We therefore advocate for a national scheme, which operates in conjunction with local charging systems. In London, distance-based road user charging can also work at the local level, given the capital's geographical expanse.

Given London's proud history of transport innovation, it should be on the forefront of developing a pilot pay-as-you-drive scheme, which could lead to an eventual national roll out. This would not only allow London to sell the technology to other cities and governments looking to implement pay-as-you-drive but it would also put London in a strong position to when it comes to revenue allocation negotiations with central government. Our research showed there is a strong preference among Londoners for at least some of the money raised by any national scheme to be spent locally but there is also a preference for a national scheme with local top-ups (47%) than separate national and local schemes (27%).

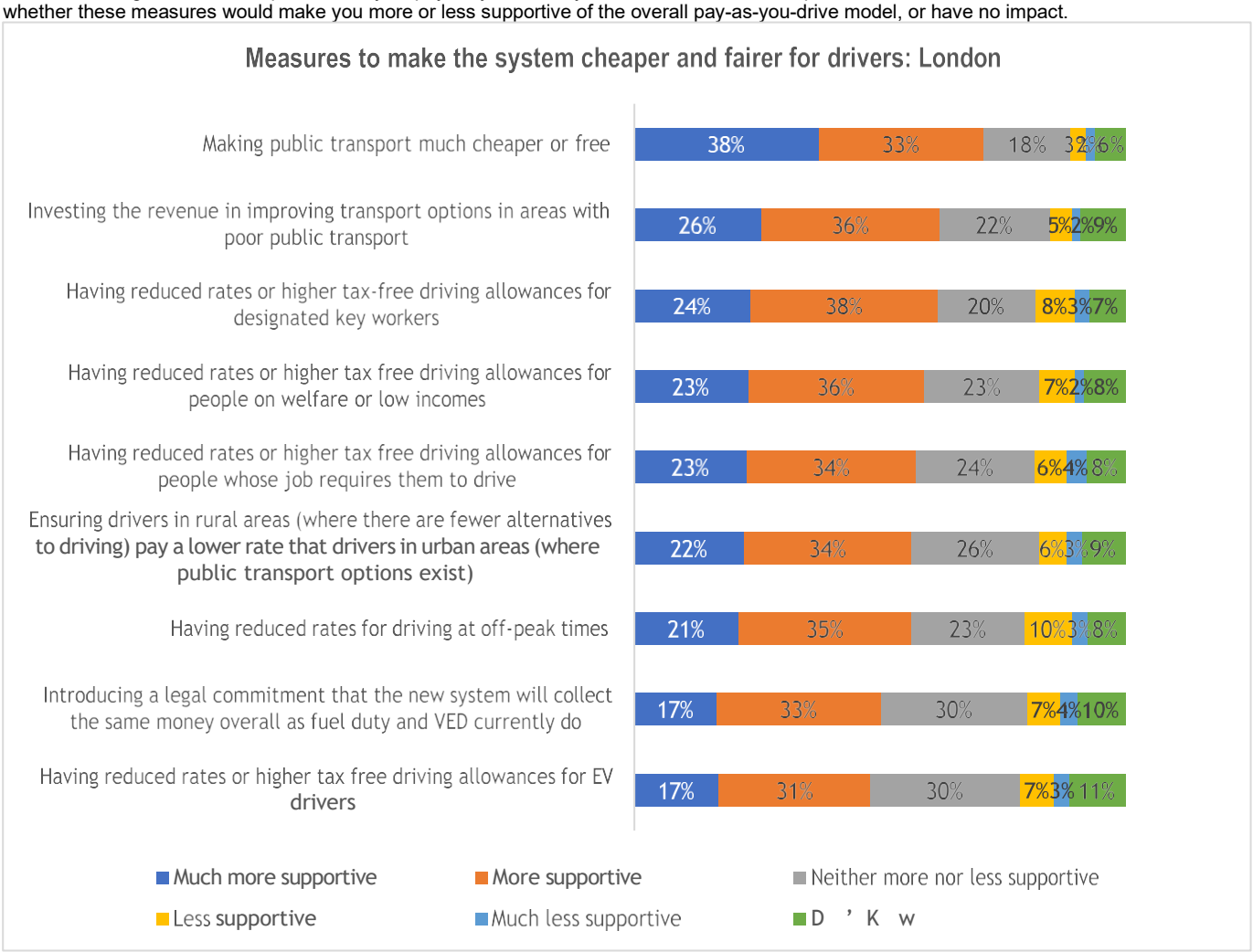
8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

A smart pay-as-you-drive scheme should replace all existing and future planned road user charges, including the LEZ, ULEZ, Congestion Charge, and road tolls.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

The main concern of people initially opposed to Pay-as-you-drive is that it wouldn't be fair to those with no alternatives to driving. Therefore, a range of mitigations that appealed to Londoners to make the system cheaper and fairer. The top mitigations were cheaper public transport fares and improved connectivity.

Q: The following measures are potential ways a pay-as-you-drive system could be made cheaper and fairer for drivers. Please indicate whether these measures would make you more or less supportive of the overall pay-as-you-drive model, or have no impact.



Exemptions and discounts for various social groups were also popular. Our research found that 62% of Londoners believe that key workers like nurses, carers and teachers should have reduced rates or higher allowance; 59% felt the same about people on low incomes and 57% about people whose jobs rely on driving such as delivery and taxi drivers.

Exemptions may be well justified for groups such as disabled people but should not be offered to all groups. While 53% of Londoners believe "exemptions are needed as some people have no choice but to drive", the remaining 47% believe that "if exemptions are introduced, then too many people will try to use them to get around paying it". Another consideration is that exemptions, once introduced, may be difficult to modify, whereas free discounts, grace periods or mileage allowances would be equally effective while being more flexible to adapt to any changing circumstances and policy priorities.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Yes. Given that road user charging is long established in the capital, Londoners are the most supportive of pay-as-you-drive of all parts of the country. As stated, we believe London should serve as a pilot ahead of national roll out of pay-as-you-drive.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

Our research demonstrates that moving from the current vehicle taxation arrangements to pay-as-you-drive is more appealing if, at least initially, it is revenue neutral. Therefore, to begin with, road user charging should not be any more expensive than the current charging scheme.

At the London level, the objective should be to reduce the number of private vehicle drivers on the roads (and therefore tackle air pollution and congestion). It should not be aimed at raising revenue, and income from the scheme should be invested in public transport.

For pay-as-you-drive to effectively encourage modal shift away from driving and bring down emission, pollution and congestion levels, there needs to be an improvement in the provision of sustainable transport options. It is essential therefore that any revenue generated from the scheme is invested in expanding public transport provision in underserved areas and walking and cycling infrastructure, as well as expanding car club options for any residual journeys that require a motor vehicle.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

No. Given existing powers, additional electoral mandates should not be required. Experience from similar schemes in other cities demonstrates that, even when support for a scheme is low before its introduction, once it is piloted and people experience the resulting benefits, support increases. It is very important, however, that discussion about any future pay-as-you-drive scheme starts as early

as possible to enable Londoners to meaningfully feed in to scheme objectives and design. As part of the decision-making, representative polling should be used in addition to a well-publicised and informed consultation. Given the current issues with the ULEZ expansion, the Mayor and Transport for London should expedite the move to pay-as-you-drive and aim to introduce the scheme by 2025.

13. **How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?**

In 1975 Singapore introduced an 'Area Licensing Scheme' to reduce congestion in the centre of the city. As a result, 19% of drivers travelling to the city centre switched to bus; 17% switched to car sharing to take advantage of the exemption for cars with four or more people; traffic entering the centre decreased by 44%, which resulted in an increase in speeds of 22% in the centre and 10% on the approaches. Singapore has subsequently moved to an electronic road pricing scheme.

Stockholm implemented a road user charging scheme in 2006 which was subsequently approved and made permanent by referendum. As a result, traffic reduced by 22%, delays by 33% and vehicle emissions by 14%.

In 2008 Milan introduced a road pricing scheme known as 'EcoPass' for all polluting vehicles entering the main city centre area. Within a year, the traffic reduction within the EcoPass zone was 14.4%, with a corresponding 3.4% reduction outside the zone. Public transport patronage increased by 3.4% and bus speeds rose by 6%. There was also a corresponding 9% reduction in CO_2 emissions.

Many countries are also currently considering how to deal with the declining revenue from fuel duty as a result of the electric vehicle transition. London – and the UK – have a unique opportunity to once again be a leader in transport innovation.

Thank you for considering Campaign for Better Transport's views. We are happy to elaborate on any of the points made in this submission.

Response from: Intelligent Transport Systems UK

Reference	RUC3392

Call for Evidence: The future of smart road user charging
Intelligent Transport Systems UK, February 2023

Intelligent Transport Systems UK (ITS UK) is the national membership association for transport technology. We provide a national platform to support the roll out of technology for a cleaner, safer and more effective transport network, both at home and abroad.

ITS UK has 150+ members, from both the private and public sector, and covering all sizes and disciplines, with members working in areas like Road User Charging, Mobility as a Service (MaaS), traffic management and enforcement, integrated transport, connected and autonomous vehicles, public transport services, smart ticketing and much more. More information on ITS UK and the intelligent transport sector can be found at www.its-uk.org.uk

We believe that intelligent transport has a vital role to play in supporting the UK Government's ambitions:

- **Economic growth**: The sector is conservatively valued at £1.5bn and generates £15bn a year for the UK economy. It is an important export, with UK businesses integral in the roll out of intelligent transport overseas, and there is potential for the UK to develop a competitive advantage in the sector in the future, with the global market expected to be worth £900bn by 2025. The industry also supports highly skilled jobs and training opportunities.
- **Decarbonisation**: The intelligent transport sector is vital in incentivising the travelling public to low carbon forms of transport and decarbonising the road, rail and wider transport network. The sector is ready to support Government in reaching Net Zero by 2050.
- **Supporting Zero Harm**: Intelligent transport systems can help reduce road deaths, such as by helping local and national transport authorities, through data, to identify potentially hazardous junctions. Similarly, the implementation of new operational and enforcement technology can help ensure we continue to make our roads safer for all who use them.
- **Opimising capacity & cost efficiency**: Intelligent transport has a key role in optimising the usage of our transport network, by making best use of current infrastructure assets, incentivising behaviour change and through the predictive maintenance of infrastructure, to name a few. Ultimately, this ensures the best possible usage of our limited road and rail network and can provide cost effective increases in capacity.

Our response to the questions raised in the call for evidence is as follows.

1. Do the current road user charging systems in London require reform?

Current road user charging systems in London were implemented to address the specific objectives of reducing road traffic congestion (congestion charge) and improving air quality (ULEZ). If it is the wish of the Greater London Authority (GLA) to take forward other policy objectives then other forms of charging may be appropriate. For example, if the GLA wishes to optimise use of the road network and/or create a more equitable scheme that charges more for those using the network more, then it may be appropriate to consider distance-based charges. In many countries heavy vehicles are charged for road use based on distance travelled due to the wear and damage which these vehicles cause to road surfaces, and the need to introduce road safety improvements.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

The current daily charges do not take into consideration the amount of travel made by each vehicle during the day for which it is charged. So a vehicle making one short journey is charged the same as a vehicle which spends the whole day travelling around within the zone. For small charging zones, this has limited impact but for a larger charging zone e.g. whole cities or whole countries, a distance-based charge is fairer. Such a distance-based charge does not overly penalise, for example, those making occasional short journeys such as the elderly driver, compared to vehicles that have above average mileage. The key to success would be to keep any new scheme simple with a clear rationale that is easy to communicate and understandable by different groups of road users.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

The Eeuity of the scheme is important, however overly complex scheme rules risks confusion across the customer base. Varying the charge for different purposes of journey is very difficult to implement. Any system of charging should use automatic technology to verify the correct charge has been applied to a journey made in the charged zone. It should be possible to check using electronic equipment any parameters used to derive the charge. In general, it is recommended only to use parameters related to aspects of a vehicle class or category which can be easily verified. Use of other parameters will create requirements to register specific vehicles for specific purposes and this will greatly increase the administrative burden of any scheme.

4. What strategies and targets could smarter road user charging support?

Smarter road charging could be used to establish sustainable funding for road maintenance, influence the shift to zero emission vehicles, improve optimisation of the network, and influence greater use of alternative (low carbon) transport options (such as mass public transit).

5. What technology could be used to support smarter road user charging?

Three main technologies are involved:

- Dedicated short range communications (DSRC) which uses radio frequency tags operating in the 5.8GHz band and which provide a secure ID for the road user which can be linked to a payment account.
- GNSS-CN (satellite positioning combined with cellular network communications) sometimes referred to as telematics which enables vehicles to report their journey through a charged road network.
- Automatic Number Plate Recognition (ANPR) which is used to verify that vehicles within a charged road network have a valid means of payment. Sometimes this is also used to identify vehicles for payment purposes but this is not recommended for schemes covering large areas or with high traffic (vehicle-km) volumes.
- Roadside equipment for enforcement which is able to automatically determine the class of a vehicle by a making a 3-dimensional laser scan of each vehicle in order to provide information to check if the vehicle has paid the correct charge.

Other technologies required relate to account management and billing systems which form the commercial back office for a road use charging system, as well as enforcement back-office systems for generating penalty notices that are issued to non-payers.

It is possible to reduce this administrative burden by using electronic technologies such as radio frequency tags which are issued to owners of specific vehicles and recognised by equipment forming part of the system. So, for example, emergency service vehicles could be issued with tags which are included in a specific list that is held in the system. Radio frequency tags are quite often used internationally within toll collection systems, such as Mersey Gateway in the UK, for specific user groups.

Automatic Number Plate Recognition (ANPR) technology can also be used but this is more open to risks such as number plate cloning and other administrative issues related to vehicle sale and transfer. Additionally, should ANPR be relied upon to monitor all streets in London, it would be expensive.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

Smarter road user charging can use differentiated tariffs so that vehicles with cleaner engines or emission free powertrains pay less than more polluting vehicles. Additionally a per mile charge incentivises drivers to optimise their travel behaviour and this has a positive impact on CO_2 emissions. For freight vehicles, a per mile charge incentivises load consolidation and reduces empty running. Evidence for all these effects can be found in reports evaluating schemes introduced in other countries.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

National systems have the biggest impact and benefit. A distance-based smart road user charging scheme could have significant benefits across the UK in terms of reducing pollution and incentivising the public to take other forms of transport.

The biggest barriers are political; road user charging can often be seen as another road tax, so any implementation would need careful consultation with the public and explanation of why the policy was being implemented. As the Campaign for Better Transport has shown, however, 'pay as you drive' polices are becoming more popular amongst the public, with polling showing that 60% of people believe vehicle taxation needs reforming, with only 6% disagreeing. 69% would be more supportive of pay as you drive if public transport was made more affordable and better connected.

A further consideration is having a national strategy for ensuring interoperability of payment across schemes that might be implemented in different cities or road networks. The administrative burden on road users having to pay multiple road network operators for a single journey can be eliminated by establishing contracts with payment service providers. This approach is taken in other countries, for example in Ireland, where one toll payment account can be used to pay tolls on all motorways and for some other services such as parking.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

In some countries distance-based charging is being used to replace or phase out fuel duty. Fuel duty is also charged (effectively) by distance travelled, but does not provide any other policy benefits.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

This is a question for policymakers and is dependent upon their priorities and aims. From a technology viewpoint, the provision of discounts for specific user groups can be administered by using radio frequency tags which verify entitlement to travel at a discounted rate. This approach is used in the Mersey Crossing toll system in which local residents are able to register for a discount. Once registered a tag fitted to the windscreen of the vehicle provides a secure ID ensuring the user receives a discount on journeys made.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Further information regarding vehicle movements would be needed to decide whether London could act as a trial location. Several trials of road use charging schemes have already taken place in the UK sponsored by the Department for Transport, notably DIRECTS in Leeds, and the Time-Distance-Place charging pilot which carried out controlled trials with small fleets of vehicles and multiple service providers.

So the question might not be related to a 'trial' but more to a first phase of a national implementation project. There would be various questions that would need to be answered if London was looking to become the first phase of a national project:

- It is not clear to what extent vehicles that travelling within the London boundary also travel on other roads in the UK. This would need to be determined to understand the appropriateness of London as a trail area.
- Does a 'national distance-based road user charging scheme' intend to refer to the UK as a whole or only to England? In the latter case, to the National Highways managed network or all roads?
- Other cities such as Birmingham have already introduced similar schemes to ULEZ, so London would not need to act as a pilot for other cities.
- Interoperability of payment for the plethora of charging schemes emerging is also a relevant question for consideration at national level, i.e. in some countries it is possible to open a single account to pay tolls and other road use charges to multiple operators through one service provider. This greatly reduces the administrative burden and increases the convenience for road users that travel on roads of more than one operator. Currently TfL does not allow third party service providers to collect charges on their behalf.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

Distance-based charging will change the amount paid by road users in total for their road use. Instead of all users paying a fixed time-based charge, those that use the roads more than others will pay more than those that use the roads less. So this means some road users will pay more than they do currently, whereas others will pay less. Road users that pay less will be those that use the roads

less, whilst those that use the roads more (and cause more wear and tear, damage and pollution) would pay more.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

Mayors are democratically elected based on their manifesto. Referendums are unlikely to endorse road use charging, given public sentiment towards schemes.

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

In other countries for example Poland, Czech Republic and Austria, distance-based charging has been introduced successfully particularly as a replacement for time-based vignette charges for heavy goods vehicles. Time-based charges are seen as not correctly reflecting the costs of road use.

In the US, several voluntary distance-based charging pilot schemes have been introduced with the objective of replacing gas tax revenue, for example in Oregon.

Intelligent Transport Systems UK
March 2023

Response from: Possible

Reference	RUC2943

Possible response to London Assembly smart road pricing investigation

March 2023

1. Do the current road user charging systems in London require reform?

Yes, reform is urgently required both to create a more modern, responsive system for drivers and to urgently address the needs of London as a whole, such as tackling the climate and nature emergencies, and health inequalities. This relates both to cutting motor traffic and also raising funding to improve public and active travel, all the more relevant with the loss of government grants. Schedule 23 of the GLA Act 1999 enables a charging scheme to be implemented to secure any objective of the Mayor's Transport Strategy (MTS). That means securing funding to deliver schemes is permissible.

Besides reducing negative impacts of transport, modernisation should be

designed to help fleet operators and drivers, particularly commercial ones, who currently face a plethora of different systems and schemes, such as emission zones, the London Lorry Control Scheme etc.

By adopting common open standards covering all restrictions, charges, permits, exemptions and contraventions, traffic authorities can catalyse innovation as well as create a more user-friendly experience. In the same way that open banking is starting to help and create new applications, this could enable drivers and fleet operators to optimise their operations and manage their payments over time.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

We urgently need to reduce traffic and it cannot all happen in a big bang towards the end of the decade. An interim step would be to charge drivers crossing the river and major roads like the north circular, akin to the zonal system for single fares. The severance resulting from these boundaries means a limited number of locations at which camera enforcement would need to be installed.

Should there be daily or weekly capping of charges, as there is for fares? We would argue not since those making the most journeys should generally pay the costs they impose on society and the environment. Special cases, such as NHS and carer visits are best dealt with via exemptions, while there may be a case for a cap for the first year or two of implementation, to help drivers manage change.

By the end of the decade a dynamic system is needed based on the type of vehicle used (factoring weight, gCO2/km and NO2 and particulate emissions), the time, the particular route and any exemptions or reductions. This could enable drivers to work out the cost of a journey in advance. If integrated with route planning apps, such as via an Application Programming Interface (API), the rate could be guaranteed, to avoid surprises. Through making overall pricing data available, drivers and fleet operators could plan in advance which days and times would be cheaper to drive, in the same way train apps let you see the cheapest times and routes to travel. Some have also argued that public transport access levels and local cycling infrastructure provision should be factored into the rate of charge. This could improve public perceptions of fairness at the point of introduction but risks perverse outcomes over the longer term so should be approached with caution.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

Although the legal powers to vary charges and provide exemptions are very broad, the challenge here would be in designing a scheme that is clear, enforceable and delivers climate and other targets, while still being progressive.

It would be easier to design a system of exemptions and discounts for essential workers and carers, tied to particular journeys, times or patterns, than to make broad brush exemptions. Such arrangements will be important to trial in the beta testing phase of road charging. Over time better alternatives to driving are likely to be available and better data as to equalities impacts, allowing fine-tuning.

4. What strategies and targets could smarter road user charging support?

Smarter road user charging is vital for a broad range of strategies and targets, due to the huge impacts of driving on our city. These include climate mitigation and adaptation; road safety and severance; health, such as obesity and cancer; air, noise pollution; biodiversity; social inequalities, innovation and economic development; housing, crime and many more. The Mayor's Net Zero 2030 Pathways work suggests that London's transport emissions cannot be aligned with NZ2030 goals without some form of road user charging to drive down car traffic.

Although evidence suggests that road user charging is likely to be the policy intervention that is most effective at reducing congestion, it is vital that this charging is not framed just around motor vehicle congestion. On many streets there are pavements of inadequate width, a lack of permeability and protection for people cycling etc. In other words where current motor vehicle flows preclude an adequate level of service for active travel, this should be factored into the level of pricing too.

5. What technology could be used to support smarter road user charging?

Londoners already are tracked extensively via the apps on their phones, with personal data being shared by data brokers amassing huge amounts of information. By contrast, creating a new charging system enables "data protection by design and default" to be incorporated from the start, with information only being able to be requested by external bodies via a court order.

There should be a simple flat fee option for those only making a few journeys into London each year, not requiring any special equipment, with enforcement via existing ANPR cameras. But, like paper tickets, this should be priced to encourage a shift to the smart option.

Other than that exception, vehicles would either need a small device or alternatively use a mobile phone app. Half of all cars on European roads are expected to be connected in 2025[1], though the proportion will be higher in London due to ULEZ, so this can reduce the need for and cost of any hardware. This would be backed up by an enhanced system of cameras on traffic signals that are already widely used.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

By reducing motor traffic and vehicle ownership, charging has great potential to reduce direct and indirect (such as manufacture and maintenance) carbon emissions. Expert bodies like the Climate Change Committee emphasise the need to consider adaptation alongside mitigation. Extensive change is needed to adapt London to growing climate extremes: reallocation of space from asphalt to Sustainable Drainage Schemes (SuDS) and tree planting is urgently required to

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[1] ttps://www.euractiv.com/section/transport/opinion/access-to-data-from-connected-vehicles-there-is-still-time-to-act/

prevent more homes and businesses being flooded and more Londoners dying from heat waves[2].

It also has a key role to address many of the goals and targets set by the Environment Act 2021[3]. Cutting particulate exposure requires motor traffic reduction, not simply changing motive power, while the new exposure based target will require greater action in London's centres, such as a higher price per mile driven where there are more people walking and cycling.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

We agree with the House of Commons Transport Committee's call for an honest conversation about the need to move to a national system, and share its disappointment about the Government's ongoing failure to do so[4]. Without action, the cost of motoring will drop by 30% as vehicles electrify. According to the DfT's new National Road Traffic Projections[5], this would lead to a massive increase in traffic and congestion.

A national scheme is needed alongside schemes for cities, to manage the greater impacts of traffic within them. By planning these systems together, they can be well integrated, both for road users and public authorities. But, in the absence of national action, London should still proceed. Due to its scale, it can set new standards, as it did for contactless ticketing, which is now being rolled out more widely.

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2 https://www.bloomberg.com/news/articles/2023-01-31/london-heat-waves-spark-highest-death-toll-among-european-cities

3 https://www.gov.uk/government/consultations/environment-act-2021-environmental-targets

4 https://publications.parliament.uk/pa/cm5803/cmselect/cmtrans/1178/report.html

5 https://www.gov.uk/government/publications/national-road-traffic-projections

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

Charging should replace the congestion charge, emission zones and also regulations like the London Lorry Control System and any road tolls.

There is a strong case to keep, indeed increase, Vehicle Excise Duty, however. Electrification delivers a big reduction in carbon but it does mean a shift from operational to capital carbon, as some of the savings from driving an electric car are cancelled out by the greater embodied carbon to construct them. Furthermore, a reduction in private cars, which are parked up 96% of the time, is essential if we are to reallocate asphalt to nature, so as to adapt to climate extremes. The CCC in 2020 highlighted how VED rates in the UK are far less than many comparable countries and the importance of changing this to reduce carbon and SUV ownership[6].

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

This is best worked out harnessing the lived experience of people and businesses, using some of the techniques we list in our answer to question 12, making particular efforts to seek out the views of those who are disadvantaged. That will need to happen as part of an iterative process before and during trials and then once a scheme is up and running, rather than as a one-off exercise.

Discounts and exemptions should be just one side of the coin: with funding also available to help people and businesses shift to freight cycles, mobility scooters and innovate new forms of services such as to deliver extra tools to tradespeople.

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6 https://www.theccc.org.uk/publication/letter-vehicle-exercise-duty-consultation/

Limited public transport should not be seen as a barrier in itself, as active travel and lift sharing can still offer a good option, whether for a whole journey or to a public transport hub.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Yes, though the key question is what would we need a trial for. Issues needing testing would include how the technology works and the scheme's social impacts in different types of areas and how to scale it. Given there is already a scheme in place in this city and that traffic imposes huge externalities, London is definitely the best place to start.

Nonetheless trials are needed in other types of area too, particularly upland rural areas, which have different geographical and social characteristics. Possible's Open Roads proposal for road pricing in a National Park[7], would be an excellent complementary trial, for example.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

More, but with the aim that typical Londoners end up paying less for transport overall, and in addition gain more from a reduction in the negative costs of motor traffic. It is widely acknowledged that car trips impose negative environmental and social costs which greatly exceed the financial costs borne by the driver.

First, the target in the revised MTS to cut car traffic by 27% by 2030 requires a radical shift in the balance of convenience and cost between driving and alternatives. This is not just about increasing the cost of driving but also improving alternatives through the funding raised.

[7] https://www.rjrf.uk/finalists

Second, driving has become cheaper over time while the cost of public transport has increased. Furthermore, the size and weight of cars has increased considerably, in many cases doubling since the 1970s, increasing the congestion and road wear each vehicle causes. SUVs, for instance, cannot pass other vehicles on many residential streets, without one vehicle pulling in. This could be dealt with by higher charges for wider vehicles on narrower roads.

Finally, because congestion and other negative externalities are highest in London, the action needed to be taken will be greater than elsewhere.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

Mayors not only have adequate legal powers but they also have been voted in and consulted in on tackling the climate emergency. Recent polling by YouGov found that 57% of people in the UK believe we need "drastic change in the steps taken" to avoid the worst effects of climate change[8]. In addition, there are a range of statutory duties covering air quality, road safety etc., all of which require radical change to comply with. We all have moral obligations to future generations too.

A binary approach such as a local referendum asking yes / no is not a good tool because doing nothing is not an option. Consultation is supposed in law to provide an opportunity for "informed comment" but too often it creates division, with those against measures not proposing alternatives that would be anyway near as effective in achieving important public goals. So instead we need to find different ways to deliver deliberative engagement of all sections of the public around: the balance of road pricing versus other measures; how best to design a road pricing scheme, and how exemptions and discounts should operate fairly.

[8] https://docs.cdn.yougov.com/oj4r98o5sn/Internal_ClimateTracker_230123.pdf

This requires a range of techniques throughout the policy design, implementation and evaluation cycle, such as citizens' assemblies[9] and gamification[10]. Gamification could be used at different stages, such as working out the best mix of road charging and other demand measures such as low traffic neighbourhoods, car parking reduction and pricing etc., then the best combination of exemptions and reductions.

Crucially, studies show that public support for road user pricing tends to follow a consistent pattern, whereby strong alignment around abstract goals such as reducing traffic falls away as details of measures to deliver this goal emerge; followed by a nadir of public support prior to, during, and immediately after implementation as the changes cause disruption to established patterns of mobility; then gradually climbs again to attain majority support as benefits of the intervention are experienced and fears of negative impacts go unrealised. This pattern has profound implications for the concept of a 'mandate' for change. We would be very happy to present evidence to the GLA outlining this trajectory.

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

There are few megacities that have both the scale of London and the level of ambition of rapid change to meet climate and other targets. London has been world leading on many aspects of urban transport, whether creation of the Tube, congestion charging and contactless bank card payment.

By contrast, the UK is significantly behind other countries regarding creating Limited Traffic Zones (LTZs) in cities and on road charging outside cities. LTZs restrict access to particular types of traffic at certain times and have been used for decades in Italian cities, with Paris set to introduce one, called a Peaceful Zone, in 2024. Only a very radical roll out of LTZs, in key places such as London's existing

[9] Citizens' assemblies as a democratic innovation in transport planning (UCL, 2020) https://discovery.ucl.ac.uk/id/eprint/10129897/1/DD_PV_IW-Print%20Draft.pdf

[10] Sustainable Transportation in National Parks - GLAS

congestion charge zone and other London town centres, along with Low Traffic Neighbourhoods, parking and other roadspace reallocation measures could come close to reducing motor traffic as much as a city wide smart charging scheme.

In any event, the importance of complementing pricing with road space reallocation is well illustrated by the first years of London's congestion zone, when taxis and vans quickly filled freed up road space.

Response from: CBI

Reference	RUC3391

CBI Response: London Assembly Transport Committee's Road User Charging Investigation – March 2023

About the CBI:

Across the UK, the CBI speaks on behalf of 190,000 businesses of all sizes and sectors, employing nearly 7 million people between them. That's about one third of the private sector workforce. With offices in the UK as well as representation in Brussels, Washington, Beijing and New Delhi, the CBI communicates the British business voice around the world.

Introduction

The CBI welcomes the opportunity to respond to the London Assembly's Transport Committee's investigation into Road User Charging.

The negative impact on the planet from rising emissions is now widely accepted. London, as a global city, continues to play a vital leadership role on climate change issues, for example the ULEZ was world leading, and is a model being emulated by other major cities, e.g., Paris. Furthermore, as chair of c40 cities, the Mayor of London has shown that the capital can also lead the way in helping tackle climate change. Moreover, London Climate Action Week provides another platform for London to help bring about solutions to climate change, by bringing together climate professionals, thought leaders and communities.

Winning the race to net zero was one of the big economic opportunities identified by the CBI's Seize the Moment[1] strategy, bringing benefits to the economy, to business, and to consumers alike. The introduction of the ULEZ was a positive step towards improving London's air quality. Businesses across the capital are committed to reducing emissions by investing in the cleanest of transport technologies and many have already acted to do this. The CBI firmly believes that continued action on decarbonisation on the part of business is necessary to achieve net zero, and that improvements to air quality are a pressing concern.

However, business is also conscious of the current challenging economic climate and requires reassurance that the introduction of any road user charging scheme will not have a significant negative impact on their ability to do business and invest going forward.

Background to CBI's position on the Expansion of the Ultra-Low Emission Zone London

- We argued that the proposed expansion of the ULEZ London-wide is a welcome step, as the capital seeks to become a net zero carbon city by 2030, while also aiming to reduce congestion, and improve air quality.
- Businesses are currently facing increased input costs, as a result of the supply chain disruptions and wider geopolitical events, with Londoners more broadly adversely impacted by the escalating cost of living. Recognising this, we urged the adoption of a warning system initially for non-compliant vehicles, which enter the expanded ULEZ, prior to issuing fines.
- The highest financial impact resulting from the expanded ULEZ will be borne by firms operating fleets across multiple boroughs and whose activity draws those fleets into the zone on a frequent basis. Construction, infrastructure, retail, and logistics sectors have noted charge averages in the high hundreds monthly. Many of these sectors provide emergency maintenance and infrastructure support to sites and projects across London.

London Lorry Control Scheme

Evidence has shown that the London Lorry Control Scheme (LLCS) has led to more congestion and longer journey times on London's roads[2]. Compliance with the LLCS typically results in a 50% increase in journey time, milage, fuel

[1] https://www.cbi.org.uk/articles/seize-the-moment-an-economic-strategy-to-transform-the-uk-economy/

[2] Business LDN – Goods of the city: https://www.businessldn.co.uk/sites/default/files/documents/2021-08/GoodsOfTheCity.pdf pp. 13

usage and CO2 emissions, according to contractor FM Conway[3]. The scheme has not considered significant technological change that has led to the introduction of quieter vehicles. Therefore, the potential introduction of a road user charging scheme presents an ideal opportunity to review the LLCS.

Shaping the future of road user charging

The business view of road pricing across London varies by sector and size. While many businesses understand the need for policies which reduce congestion and improve air quality, this is countered initially by additional costs. Many firms operating fleets across London are currently facing cumulative cost increases in the provision or maintenance of energy, labour, and buildings.

The current patchwork of various zones designed to reduce emissions across London – and more recently across the country – is increasing the burden on business as they look to navigate each scheme to ensure compliance. Low traffic neighbourhoods, clean air zones like those in Birmingham, Oxford and Bristol, ultra-low emission streets and London's current ULEZ all represent regulatory hurdles for business to overcome.

With businesses operating across multiple localities throughout the country, there is an increasing desire to find a holistic approach to road user charging nationwide. The capital currently has three, and potentially four charging schemes which business needs to navigate[4], including the Congestion Charge, the Low Emission Zone, the Ultra-Low Emission Zone, as well as the proposed Silvertown/Blackwall tunnel toll. A universal road user changing scheme London-wide could be seen as a potential solution and bring an end to the complexity of various overlapping schemes.

The introduction of any road user charging scheme must not present undue complications or burdens for business to ensure compliance. Simplicity is therefore a highly valuable trait which must be at the core of the scheme. That being said, the scheme should also strike a balance to ensure that it continues to incentivise the best low carbon behaviours, be that the greater uptake of low and zero emission vehicles, or else the greater use of zero carbon modes of travel such as e-bikes, micromobility vehicles, and walking and cycling. The CBI is not yet convinced that telematics technology which may be required for a future road user charging system is sophisticated enough to guarantee businesses are incentivised to shift to the lower carbon behaviours, and this will therefore need to be a consideration in the drawing up of any road user charging telematics-based scheme.

In drawing up a potential road user charging scheme, Transport for London should work closely with the Department for Transport to ensure that the principles embedded in the scheme are consistent with potential plans for a national scheme. While the DfT has not publicly laid out its plans for a national scheme, any TfL scheme could likely provide a blueprint for the country at large. A TfL-designed scheme that runs contrary to the principles of any national scheme could ultimately lead to further confusion and uncertainty for business.

Ultimately, the end goal of road user charging must be a universal system that is simple and efficient for business to navigate across London, with a view to a government adopting a similar system at a national level.

CBI welcomes further engagement with London Assembly Transport Committee as part of its investigation.

[3] Ibid

[4] https://www.businessldn.co.uk/sites/default/files/documents/2021-08/GoodsOfTheCity.pdf pp. 10

Response from: Collaborative Mobility UK

Reference	RUC3032

CoMoUK response to the London Assembly Smart Road User Charging Consultation

By email to: scrutiny@london.gov.uk

10 March 2023

About CoMoUK

Collaborative Mobility UK (CoMoUK) is the UK's charity dedicated to the social, economic and environmental benefits of shared transport. Shared transport covers a range of modes including car sharing, bike and e-bike sharing, demand responsive transport (flexible bus), e-scooters, as well as 'mobility hubs' that integrate shared transport with public transport and active travel. We work with local authorities across the country and with shared transport operators. We also conduct unique research on shared transport, accredit operators, publish guidance and undertake policy and advocacy work to promote shared transport's benefits. We have over a decade's worth of annual user and operator research including specific reports for London, many of which were co-funded by TfL.

Introduction

Car clubs have a proven track record of delivering on the Mayor's Transport Strategy goals and getting people out of private car ownership. Such an approach is critical to London's goal of being a net zero carbon city by 2030 and to the Mayor's Transport Strategy goal of 80% of journeys being by sustainable modes by 2041. CoMoUK's annual car club survey has found that each London car club car displaces 24 private cars, meaning over 85,000 private cars have been removed from the road in London by car club members[1]. They also:

- cut users' net mileage – 29% of car club survey respondents stated they had reduced their car miles since joining
- increase users' use of public transport – in 2021 75% of respondents said they used public transport at least once a week compared to an average in London of 42% of people using the local bus once a week and 19% using rail once a week
- deliver access to a car at low cost – 54% of respondents agreed that car club membership allowed them to travel to places which wouldn't be accessible otherwise.

This is 'heavy lifting' on decarbonisation, liberated space, better air quality and better places in action.

[1] From CoMoUK's 2021 car club research report for London: https://www.como.org.uk/documents/car-club-annual-report-london-2021

The need for reform

Shared cars have very different dynamics to privately owned cars, as is recognised in the DfT's transport decarbonisation plan and by the Committee on Climate Change's adoption of car club use as one of its two measures on whether the UK's relationship with the car is trending in the correct direction in terms of reducing transport's emissions. While car club cars are easily compliant with the Ultra Low Emissions Zone (being substantially cleaner than the general London car fleet and having ten times the proportion of EVs nationally than the UK's car fleet), the Congestion Charge problematically treats shared and private cars as the same. Despite there being Congestion Charge exemptions for, for example, residents (90% discount), which benefits and entrenches private car ownership and therefore use, car club cars are subject to the full charge in all circumstances. This is regressive and not compatible with sustainable mode share and net zero goals.

Furthermore, the congestion charge does not act as a demand management tool for car club drivers. To include an accurate congestion charge fee for a specific booking would require prior knowledge of whether any booking had already taken place earlier in the charging period, as well as foreknowledge of any future chargeable movements in the charging period. The cost is therefore absorbed directly into car clubs' operational costs. Recent changes to the congestion charge, including the extension of charging days and hours, the removal of the Fleet Auto Pay discount, and the Auto Pay discount removal have all increased the cost of the Congestion Charge to car clubs in London.

All this has added extra costs to the operation of car clubs in London to the tune of low millions of pounds per year. Despite their role in displacing private car ownership, cutting car mileage, saving people money and reducing emissions, car clubs have to bear this cost in addition to receiving no subsidy and paying fees to operate (fees which are often many multiples of the cost of residential parking permits).

Benefits of smart road user charging

Smart road user charging can offer a more sophisticated and coherent road pricing system for London than currently exists – one that incentivises more sustainable choices and encourages sustainable travel behaviour as part of its design. It has the ability to recognise the role played by shared cars in reducing private car ownership (and also the role bike and e-scooter share can play in complementing them). TfL should take the opportunity presented by any changes to charging to more actively promote and support alternatives to private ownership of cars to Londoners, including shared transport, public transport and active travel.

Conclusion

There is considerable potential for car clubs to develop further in London with the right support, and take more private vehicles off the city's roads. CoMoUK's report *Driving London Forward*[2] identified car-owning households where trip frequencies and characteristics indicated that they could move from private car ownership to car club use

2 https://www.como.org.uk/documents/driving-london-forward-full

with the right incentives. It showed that if 21,000 additional car club cars were provided (currently there are around 3,500), this would lead to 300,000 fewer privately owned cars and 24 million less car trips per year.

However, any implementation of a sophisticated road user charging scheme for London needs to see the current perverse incentives that impact shared transport by the current charging regimes removed. In their place, it will be possible to establish a system where the growth of shared transport can be supported through clear pricing signals in a way that augments the positive impacts such a charging scheme could have for London.

Response from: Islington Council

Reference	RUC3390

London Assembly Transport Committee's Call for Evidence : The future of smart road user charging

Thank you for extending the period to allow Islington Council to respond to the Transport Committee's Call for Evidence on the future of smart road user charging.

Our Transport Strategy shows that Islington Council supports road user charging, with specific commitments to work with TfL and neighbouring boroughs to investigate further expansion of road user charging and potentially introduce variable charging as a measure to discourage people from driving, particularly during periods when traffic congestion and vehicle emissions are at their highest. Road user charging is also supported in the council's Vision 2030 Strategy as a measure to achieve net zero by 2030.

Road user charging can contribute to the council's policies, including Policy 1B to reduce the volume and proportion of trips made by vehicles in Islington and Policy 3D to reduce carbon emissions, as outlined in the Islington Transport Strategy. Smart road user charging can support our strategies and targets including reducing congestion and air pollution and encouraging mode shift and more active travel, helping to create a cleaner, greener, healthier Islington. Islington has a target to be net zero by 2030 and variable road user charging could be a key tool to help achieve this target.

Regarding how charges for driving in London might be varied for different journey purposes, it is our view that any smart road user charging system will require appropriate mitigation such as discounts or exemptions to ensure that the system does not have a disproportionate impact on people such as those on low-incomes, disabled people, or essential car users.

We consider a regional road user charging scheme would be preferable but would also support a national system. We would like to work with Transport for London and other boroughs through London Environment Director's Network (LEDNet) to develop a regional system and trial technological solutions.

It is essential that boroughs both consider road user charging and also benefit from the proceeds for local investment. We request that any revenue generated from charges in local areas should be ring fenced and used by local authorities for local investment, to mitigate the environmental impact of driving and to enable investment in schemes that encourage mode shift and reduce the use of private cars. Islington council is also committed to reducing road danger and traffic speed to 20 mph. Therefore, we believe that local authorities should be given the power to enforce speed restrictions to support a reduction in road danger.

Response from: Federation of Small Businesses

Reference	RUC2945

FSB London
Floor 3
10 Dean Farrar Street
London
SW1H 0DX

London Assembly Transport Committee
E: scrutiny@london.gov.uk

10 March 2023

Dear London Assembly Transport Committee

Federation of Small Businesses (FSB) response to:

Road User Charging Consultation

(for 10 March 2023)

Introduction

The Federation of Small Businesses (FSB) is the UK's leading business organisation. It exists to protect and promote the interests of the self-employed and all those who run their own business. The FSB is non-party political and is also the largest organisation representing small and medium sized businesses in the UK.

Small businesses make up 99.2 per cent of all businesses in London and make a huge contribution to the UK economy. They contribute 44 per cent of London's GDP and employ 39 per cent of the workforce.

FSB Response

Noting the key issues being investigated by the London Assembly Transport Committee to better understand the future of smart road user charging in London, ***FSB London responds as follows:***

1. **Do the current road user charging systems in London require reform?**

In 2022, in response to the Mayor's ULEZ Expansion consultation, our survey finding indicated that *30 per cent agreed to an emission-based road pricing system as opposed to the current Congestion Charge, LEZ and ULEZ.* (Source: https://www.fsb.org.uk/resources-page/fsb-london-calls-for-ulez-proposal-rethink.html

However, *when asked whether small businesses agree with road-user charging as a policy– only 22% agreed. With the fact that the figure increases to 30% when you remove current charging mechanisms (Congestion Charge, ULEZ, LEZ) from the equation, demonstrates that there is argument to be had that implementation must be small business friendly to take these essential journey makers on the road to a potential new charging system.*

From FSB London research carried out in 2021, 58% of small businesses said *there should be a demand managed road pricing scheme and that the current charging structure should be removed.* (Source: FSB London: Infrastructure Policy Report https://firstvoice.fsb.org.uk/static/1913c09f-5998-48c0-9b00451d66c024e6/FINAL-London-Infrastructure-Report-Feb-2021.pdf)

From the findings reported, FSB London surmises that better targeted policies can win small business support and is of the opinion that a further consultation stage must take place; a public consultation that clearly outlines the proposed future smarter road user charging system(s)/options for the London region to ensure that the small business community understands what the alternatives are to the current congestion charge, LEZ and ULEZ; the latter yet to be fully implemented or experienced across outer London. Small businesses are essential business journey makers and this must be recognised in any future charging system.

Small businesses want to understand the concept of smarter future road charging and how it will work to be in an informed position to provide the answers to the investigations being carried out by the London Assembly Transport Committee.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

Whilst the majority of those responding to our 2022 survey did not support the idea of a demand-based road user charging system, a minority did make some suggestions in relation to such a system, with many of their comments carrying caveats. For example:

- *'Demand should drive price and incentivise avoiding peak times';*
- *'Provide 'exemptions and discounts for those on low incomes and with disabilities, and support for charities and small businesses';'*
- *'Base on a marginal priced scheme;'*
- *'Pay by mile or time;'*
- *'Not to be 'demand focussed' only;'*
- *'Must be affordable and fair.'*

Previous FSB research[1] showed that nearly 6 in 10 (58%) of businesses would prefer a road pricing demand managed system as opposed to the current charging mechanisms. The fact that the figure of those supporting a change in system has halved in an 18 months period is as a result of the cost of doing business crisis and how small businesses are more wary of policy implementation that does not recognise essential business journeys.

[1] FSB London Infrastructure report: February 2021 https://firstvoice.fsb.org.uk/static/1913c09f-5998-48c0-9b00451d66c024e6/FINAL-London-Infrastructure-Report-Feb-2021.pdf

3. **How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?**

We note the question refers to driving in London which suggests any future road user charging system will relate to motorised vehicles only.

Noting the views of our London members, we believe certain small business sectors must be provided with exemptions from some/all charges, for example – tradespeople providing essential maintenance services plus those involved in the care sector. Then, a discounted scheme for those involved with sectors such as construction, property, food, health and wellbeing. Lower income businesses will need to be acknowledged in a future charging scheme – employers and employees alike.

More details are required as to what the proposed 'charges for driving' might look like to be able to provide a more informed response to this question.

4. **What strategies and targets could smarter road user charging support?**

From the open question responses received from survey participants, the strategies and targets identified can be grouped as follows:

- *Improve the condition of London's roads - a much improved programme of pothole repairs and therefore reduce cost of repairs incurred by small businesses;*
- *Travel to work behaviour change where a motorised vehicle(s) is not essential for a small business to operate;*
- *Active travel promotion and take-up within small businesses that can embrace it within their day to day operations;*
- *For small businesses to consider public transport more if provision and service efficiency is improved across the entire Greater London region;*
- *Road congestion reduction;*
- *Air quality enhancements for all Londoners to benefit from;*
- *To become a nationwide scheme; not just in London, and whereby it could replace road tax rather than become a double tax.*

We ask that the London Assembly Transport Committee acknowledge our response. Thank you.

ENDS.

Response from: Hillingdon Friends of the Earth

Reference	RUC2920

Dear Sir/Madam

Please find **Hillingdon Friends of the Earth's** response to your call for evidence below.

Road User Charging - Call for Evidence

1. **Do the current road user charging systems in London require reform?**
   Yes, because:
   - the geographic areas covered are not wide enough, so many boroughs do not benefit from the impacts of charging
   - the systems have almost no impact on reducing greenhouse gases, in fact they encourage larger cars that emit more greenhouse gases. This is because people are encouraged to sell their old smaller diesel cars with lower CO2 emissions then, because humans generally aspire to more and larger possessions, many end up replacing them with larger petrol cars with much higher CO2 emissions. To compound education and misinformation issues about lowering carbon footprints, when number plates are input to the TfL website it says modern petrol vehicles with high CO2 emissions are Ultra Low Emission!
2. **How might smarter road user charging differ from the current daily charges for driving applied in London?**
   - Paying more for vehicles with higher CO2 emissions (the charge should rise almost exponentially relative to CO2 emissions because people with cars that emit massive amounts of CO2 have the money to pour fuel into them, so should pay much more to subsidise public transport for the people who care about the future of our planet).
   - Paying for distance travelled instead of by time period.
   - Paying more at specific times of day, for example higher charges at peak periods to flatten demand so peak congestion is reduced so vehicles on the roads run more efficiently.
   - Only if charging by distance travelled is not possible to implement, then the daily charge should be changed so instead of midnight to midnight it starts when the vehicle first enters a zone. This will assist people on night shifts who may find public transport is less available and end up paying road charging on two days to work one night.
3. **How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?**
   - As with all groups and services, the first priority must be to encourage and make provision to get as many road users as possible using active travel and public transport. This must be done by reprioritising roads in favour of active

travel and increasing the amount of public transport and making it more accessible.
    - Next, for any groups and services for which active travel and public transport are not practical then grants should be made available for alternative vehicles with lower emissions that incur lower charges.
    - Lastly, all disadvantaged groups and essential services that have to travel by private vehicle because they have no reasonable alternative should be exempt or have substantial discounts. However, it must be possible to accurately identify members of the groups while they are using the roads. This should also apply to private vehicles provided by employers to actively reduce road use, for example private electric buses to offices from nearby railway or Tube stations.
4. **What strategies and targets could smarter road user charging support?**
    - Reducing greenhouse gas emissions.
    - Increasing levels of public health by promoting active travel and reducing particle emissions.
    - Fewer road accidents owing to less traffic.
    - Improve bus and tram journey times and reliability.
    - Boost the economy by having less congestion so reduced travel times.
    - Continue to reduce particle pollution.
5. **What technology could be used to support smarter road user charging?**
    - ANPR cameras
    - Vehicle tracking using the mobile network
    - Vehicle telematics could allow charging when a combustion engine vehicle is left idling, in addition to distance charging.
    - Integrations with data sources about individual vehicle emissions and disadvantaged groups (for example blue badge holders and carers).
6. **How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?**
    - By encouraging people to drive cars with lower CO2 and particle emissions.
    - By encouraging people out of private vehicles and to use active travel and public transport instead.
    - By flattening demand which reduces congestion so necessary vehicles run more efficiently.
    - By reducing private vehicle miles by encouraging people to share vehicles to share the cost of any charges.
    - Loop revenue back into further improving active travel and public transport.
7. **Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?**

    Climate change and public health are desperately urgent crises to address so whatever has the largest and quickest impact on reaching targets is the best option. In the longer term a national system is surely going to have the most benefits on reaching targets. Every hour of delay to the implementation of better road use charging takes us closer to not being able to reverse the climate disaster while people are dying owing to particle pollution and climate change. All the while people continue to buy more and larger cars with higher CO2 emissions.

8. **If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?**
   It should replace vehicle excise duty but not fossil fuel duty.
9. **What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?**
   - Within Greater London, there are no areas with levels of public transport so low that it is not a viable option in most cases, although levels of public transport should be increased everywhere.
   - As with all groups and services, the first priority must be to encourage and make provision to get as many road users as possible using active travel and public transport by reprioritising roads in favour of active travel, and increasing the amount of public transport and making it more accessible.
   - Next, for any groups and services for which active travel and public transport are not practical then grants should be made available for alternative vehicles with lower emissions that incur lower charges.
   - Lastly, all disadvantaged groups and essential services that have to travel by private vehicle because they have no reasonable alternative should be exempt or have substantial discounts, so long as it is possible to accurately identify members of the groups while they are using the roads.
10. **If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?**
    Yes, or whichever place is quickest to implement and enable ramping up to a national scheme most quickly because the targets need to be met desperately urgently.
11. **If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?**
    Other than disadvantaged groups and essential services Londoner's should pay more so they are encouraged to use roads less and swap to active travel and public transport when at all possible.
12. **Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?**
    Only if they make the schemes quicker and more economic to implement and administer.
13. **How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?**
    Amsterdam is the best model for how road use should be prioritised to encourage people out of cars and reduce emissions.
    Unsure about examples of road user charging.

Response from: Wyeval Consulting

Reference	RUC2999

Introduction

This note seeks to offer thoughts in response to the Call for Evidence issued in February 2023 by the London Assembly on “the future of smart road user charging.” It is based on observations from working with UK and many overseas companies on technology-based solutions for charging, enforcement and related ITS applications.

I founded Wyeval Consulting as an independent company, working in partnership to apply ITS technologies for sustainable improvement in the quality of life. Wyeval offers more than 30 years' experience in the development, auditing and implementation of innovative solutions, focussed upon Intelligent Transport Systems, Road User Charging (RUC) and Driver Services programmes. The integration of transport hubs with renewable energy providers is a further current interest.

Our mission is to add value and quality for the successful development of ideas, products and projects. From involvement in local, national and international programs, we are interested in traffic and transport, mobility, safety and our environment. I founded and co-chaired the ITS UK RUC Forum for 16 years, creating an international forum for best practice. I regularly chair the Brussels CiTTi/RUC conference, and write back-page offerings for the popular, ITS-based CiTTi Magazine.

My aim is to offer any insights thought to be relevant and maybe to provoke thought about options. In limited time I have addressed most questions but can support any assertions or references with more source material if you feel that any items are deserving of more attention.

1. Do the current road user charging systems in London require reform?

Yes, it seems that the current scheme is unfriendly to drivers who have to use different charging regimes. This appears mainly as a failure of central government, and local operators have not secured any improvements as ITS-based charging schemes have evolved during the past twenty years. Sometimes, evidently needed improvements tend to be added as afterthoughts. Schemes are always subject to change, influenced by policy decisions and external influences, but best practice may be constrained from the start by expediency or lack of capital/resource to look ahead. Media attention can be manipulated by interests that can attract populist elements but maybe do not coincide with sustainable health and environmental targets.

Interoperability of systems is generally poor compared with cities in other European countries, e.g. Dublin’s M50 orbital toll (eFlow) also operates payments seamlessly across every other toll in Ireland. Equally other Irish toll payment services are interoperable for the M50.

In major tolling countries such as Spain, Portugal, Norway, all free-flow tolls are fully interoperable using devices homologised via nationally approved and supervisory authorities. France is developing a free-flow capability to supersede its already interoperable national system for barrier tolls. Nascent RUC programmes in the USA are recognising the value of wide-scale interoperability.

Increasingly, European cities are choosing to ban entry for the most polluting vehicles, governed by a national framework that is readily understood and applied. The UK prefers to charge money, giving toxic vehicles the right to drive around urban and residential areas.

Perhaps this deficiency will be remedied ultimately. Meanwhile the national cost, damage to personal health and environmental impacts appear to outweigh the revenues achieved by budget-strapped individual cities installing schemes demanded by central government.

In the UK no other road charging scheme is compatible with the TfL schemes, not even the Dartford Crossing toll, which is termed a congestion charge, and uses a common logo with the London scheme. As contracts have been updated and re-awarded, it seems that lip-service has been paid to interoperability, but charges for e.g. the M6 Toll and Mersey crossings are not compatible technically, commercially or contractually. In implementing each system it seems that expedience is valued over any harmonisation. This habit has continued so that the framework created for English CAZ schemes has no commonality with the London LEZ, ULEZ or CC charges. Oxford is free to create a disconnected ZEZ scheme requiring yet another account. Is it already time for a reboot?

There has been a problem in catering for foreign drivers, noting that in ULEZ, LEZ and CAZ schemes no original provision was evident, so that a foreign driver, whatever the vehicle status might receive a full fine (£200 to £330 in London dependent on geography), enforced by a letter where feasible to the owner's registered address from TfL's agent EPC. Unsurprisingly over the past five years less than 20% of recipients paid anything[1].

Anecdotal web data from visitors suggests that this policy caused resentment (the great majority of foreign drivers would anyway most likely be driving a compliant vehicle). It is understood that EPC has now been appointed as an agent for registering would-be visitors in advance, separately for both CAZ and LEZ schemes. There appears to be no post-visit facility for drivers who happen to visit a charging city, and the countries covered are limited by access policies operated by European cities.

Presumably as a non-EU member UK authorities will not have ready access to the EUCARIS database as its functionality expands to improve enforcement for civil violations, harmonizing the digital exchange of vehicle data and providing a support network to develop future cooperation[2].

A silo mentality can be the enemy of good governance and effective integration, and there are instances in the UK (and elsewhere) where extending the use of RUC more widely has been impeded. Some may think this a benefit(!) but many more believe that RUC should be a readily available facility enabling recovery of dwindling fuel tax revenues, managing congestion and influencing behaviour in the interest of environmental health and climate.

It's also an idea to consider introducing graduated driver charges sooner rather than later, before more serious growth in EV usage establishes users' cost expectations that could sweep away opportunities to integrate road usage taxation reform. The opportunity to bring in a needed tax reform may be lost if EV energy charges set the scene for policy provision. Specific discussions are taking place in a number of US States to inform and motivate their populations about funding transition to enable the sustainable financing of transport, which has tended to gain precedence over environmental issues.

Overall a more positive approach is needed to coordinate reforms, and London's schemes should be better integrated and harmonised in the interests of building acceptance and ensuring compliance by ease of usage and perceived fairness of policies.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

A key question here is, what are the desired outcomes from policies that could use RUC as a part of the transition strategy? Each such purpose, and the user cases associated, may give rise to subtly different approaches, and potentially bring unexpected consequences. Such a situation arose historically when TfL allowed low-emission discounts or exemptions to the congestion charge, which resulted in 55% of vehicles being exempted. Each element should be separately identified, and understood by users, avoiding mixed messages. EVs still cause

[1] FOI-1137-2223 published: 08 September 2022

[2] https://www.asecapdays.com/images/2021/PDF/PRESENTATIONS/2.-SERVI-BECKERS.pdf

congestion, and it is not logical to exempt any vehicles for irrelevant reasons.

It has been a holy grail that vehicles in London should be charged by distance travelled rather than by a time-based congestion fee as at present. However, while it's logical to charge per mile on a motorway, why is it optimal for an urban landscape?

The precious commodity is not distance. It is time. Time is actually priceless. Once lost, it can never be regained. Is there an advantage in ditching distance and concentrating on the main parameter by which we measure our lives? Time – particularly, time spent at the wrong time.

This time is spent taking up valuable road space. This same time is spent emitting noxious fumes, noise and greenhouse gases. Time spent on the road, not distance, is the main factor in generating external costs. The better the traffic flow, the shorter the time, the lower the emissions and delays. Every vehicle has two modes of existence: time spent being driven, and time spent being parked. When parked, there is every justification for charging by the hour for using precious urban space. It can be argued that the time spent on the city's roads is more precious – much more so if the distance driven during that time is woefully little. The technology exists so that the time spent driving and time parked in a city could each be logged and charged appropriately, depending on class of vehicle, location and time of day.

Time rather than distance seems to be a valid proportional measure both of economic damage and the degree of pollution caused. The more time spent on the roads, the greater the congestion. In my view, distance might not be such a good measure of disruption in a crowded city.

As an afterthought, perhaps unshared taxi rides could include a time-based element, so that extra vehicle time spent on the road incurs a surcharge. As long as public transport can be funded and operated to provide appropriate services, it is reasonable to channel efforts towards its use, and to gain a contribution from drivers and hailing services according to their respective occupations of the highly valued space-time continuum.

The definition of the word 'smart' is open to interpretation, and perhaps we need to create specific targets for each of the parameters we wish to control, and adopt accepted ways to measure success, in order to optimise the means. Otherwise we might put the cart before the horse, and end up justifying results that might have been achieved by accident rather than design.

Incentives to use public transport rather than driving could be explored further, as previously seen in pilots such as Spitsmijden in the Netherlands.

We should not apologise for wanting to remove as many cars from city streets as we can. All streets should be as low a traffic neighbourhood as we can manage, so that they can be returned to people rather than their vehicles. Streets used to be community assets, part of a neighbourhood, rather than strips of asphalt upon which vehicles are driven at a maximum allowable speed. That might be a really smart outcome.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

Creating a price spectrum for a fairly infinite hierarchy of transport functions is infinitely challenging. We need to keep it simple, and ensure that stakeholder needs are properly understood. Who decides whether MPs or nurses receive free parking? I thought so.

If you want to know how long is a piece of string you first have to measure it. This is a matter of policy; if it were up to me, the people whose services we needed most during emergencies such as Covid would be given priority, which might include free travel by whichever means was most effective. RUC is simply part of their cost structure and should be integrated accordingly.

4. What strategies and targets could smarter road user charging support?

- Air quality improvement: as well as ANPR cameras to detect passage of time-worn vehicles

- Real-time spectral analysis at key locations could detect and help to deter the most polluting vehicles irrespective of number plate, enforcing vehicle maintenance, combatting fraud and verifying correctness of prior assumptions. We can close the loop, so that feedback gained enables continuous improvement.
- CO2 reduction via ANPR certification is now a feature of EU measures, in order to encourage usage of more efficient vehicles.
- Funding of roads and infrastructure, according to policy priorities and targets
- Driver behaviour via cooperative systems and telematics-based strategies
- Value-added services for drivers, and incentives to vary travel modes
- Route planning to minimise user costs and encourage alternatives to driving
- Awareness of travel choices to simplify travel while utilising city resources efficiently

5. What technology could be used to support smarter road user charging?

Low-tech solutions such as periodic odometer readings may still have their place, and are for example considered within the current procurement process for national RUC in the Netherlands, as way forward towards GNSS-based universal charging. The usefulness of technology choice is time and place dependent. In the US, RUC schemes include the maximum possible choice, so that fixed monthly fees could be a possible option for GNSS objectors, or a stepping-stone to location-based services in future.

If this question is specifically about London, cameras are so far most useful in cities, pervasive, prevalent and economic for access, enforcement and video tolling. So-called 'smart' charging may use cameras to encourage compliance, but will increasingly rely on vehicle or driver centric equipment.

GNSS may be used to trigger time-based charging in specified zones, or to charge for distance travelled inside given zones. To design a GNSS device specifically for an urban application is however expensive, because vehicles need to be equipped. For ease of use and economy of scale much effort is spent in Europe to move from national to EU-wide (EETS) interoperability.

For London, generally a GNSS device would have either to be part of a wider, preferably national scheme to equip all vehicles, or use existing telematics equipment wherever possible. A 'BYOD' (bring your own device) localised scheme could possibly work, and is being considered in some places currently (e.g. for congestion charging in the Brussels Metropolitan Area[3]). In this case a user is already equipped with an existing, approved/suitable device, which can be interfaced to the charging back office. This device could be a cellular phone or location-based services facility adaptable to include further payment services.

Use of such an approach could also help to meet any privacy concerns. However, in an urban setting, cameras still remain the most readily adapted technology for universal charging and/or enforcement.

The use of personal mobile phones has been problematic in earlier trials (e.g. USA) and a vehicle-specific GNSS device is generally more foolproof. However, times will change. Many commercial offerings can be used in specific applications (e.g. GNSS-monitoring for programmed events such as bridge crossings) but the secret is to create a larger framework

[3] The current Belgian specifications discuss a BYOD approach which forms the basis of their current tender for HGV distance-based charging. Use of an OBU is mandatory, so that a 'standard' unit would still be available for use by an unequipped vehicle. Standardisation of vehicle equipment tends to be impeded by competitive concerns between vehicle suppliers, and the inability to impose a common minimum functionality across the board. The use of automated emergency calling and connected vehicle technologies may accelerate harmonisation but it all takes time unless a concerted effort can be made.

which can cover the widest range of foreseen applications, requiring with cooperation in defined commercial, legal and financial scenarios. Data sharing, often a problem for commercial operators, is increasingly essential in any regulated and reliable scheme. Access to a back office can then take place via a user's chosen means rather than by inventing ever-more sophisticated front ends.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

In January 2022 a report by Element Energy, commissioned by the Mayor, found that car vehicles kilometres in London need to reduce by at least 27% by the end of the decade in order for the Mayor's 'net zero' target to be met.

Such a large reduction is likely also to have a significant but undefined impact on toxic emissions and congestion; but the question seems to be asked backwards. I would ask: what is the contribution required from the driver to control traffic volume, CO2 and polluting emissions?

The same RUC technologies can be harnessed to meet each of the goals; but the contributions should be allocated separately, and people who have to pay charges should understand what each specific charge is designed to achieve. Avoid mixing the messages, and leave no room for rumours.

Successful management of congestion, CO2, PM and NO2 is not a by-product of road usage charging – it is the reason to install appropriate applications. The parameters of success should be defined in advance. A reduction in traffic level might also reduce pollution, but that is not pre-ordained, and the primary aim for congestion charging is to reduce congestion.

The rationale for clean air zones is that polluting traffic exists. So they are not needed at a future date (as announced e.g. by the Birmingham Mayor). However, congestion management, road safety and decisions on traffic (such as priority of user classes) will still be an issue indefinitely.

It is also essential that the overall volume of traffic is reduced: if private cars are simply replaced by Uber (or similar 1:1 services) instead of improved public transport, there is no improvement. Each class of vehicle should pay according to it priority, usage and pollution caused.

Electric vehicles should not automatically be exempt from congestion charges and tolls, as they cause congestion; and they can make pollution worse: (a) because they hold up polluting ICE vehicles, and (b) because contrary to some beliefs driving EVs is not a zero emission activity.

If the intention is to remove cars from city streets then EVs should also be discouraged. Is it a sustainable policy to rapidly install electric charging points in city centres while nationally reducing bus services by 20%, as has happended in the past two years? And EVs are not emission-free: they generate significant micro and nano particulate pollution which goes into the air, soil and rivers.

In many European cities, the most polluting classes of vehicle are not charged for driving in the city, because they are not allowed in the city. Examples include the French Crit'Air scheme, and Spanish schemes. Generally there is a national framework within which cities operate their policies. Spanish drivers are managed through the national register. If you are a foreign driver in Barcelona metropolitan area you must register beforehand and check that you comply with stated environmental standards. If your vehicle does not meet the requirements, you must apply for daily permits (maximum of ten working days per year) to drive in the Barcelona Ring Roads Low Emission Zone.

Such policy requires manual or ANPR based enforcement but is simple to operate. It is a separate policy strand from congestion charging, but can share technology.

Smarter RUC can enable or work alongside:

- more specific access control of polluting vehicles alongside congestion measures
- personalised services for mobility pricing applications

- Integration of travel options for ease of choice and reduced car usage
- demand-responsive public transport, complementary to fixed route services
- reinforcement of LTN policies and zoning exercises to reduce peak traffic and to even out flows during the day.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

The tax structure at national level dictates possibilities. Fuel tax, VAT and vehicle taxes are paid by every user, including London road users, and so RUC schemes dependent on such tax changes must be governed nationally, unless powers are devolved.

Devolved taxation could enable finer tuning of regulations to best serve local needs. Every region and town/city has different priorities, but often lack the resources and powers to implement the best solution. The UK is highly centralised, especially where the all-powerful Treasury is involved.

A plethora of local schemes can become confusing unless care is taken to make their driver interfaces interoperable. For example: CAZ in English urban areas; ZEZ in Oxford; LEZ/ULEZ in London all require signing for different accounts. Add in the Dartford Crossing, and any planned further crossings, airport charges, etc. This is time-consuming, tiresome and confusing, and tends to discourage desired tourist visitors as well as impeding progress towards wanted behaviour.

Other countries seem able to set up national frameworks within which a wide range of road charges can operate relatively happily. Examples include Ireland – eFlow and PPP schemes, currently moving towards a national tolling scheme via Project Bruce; Portugal, using EU standard DSRC charging; Norway, with 250 tolls arranged with a nationally based regional framework, also interoperable with neighbour countries. In contrast the UK does not possess one toll scheme that is interoperable with any others in a different city. This is actually our job. Things must improve if we are serious about RUC.

There is no observable sense in the levels of pricing for public EV charging, where currently up to 72p /kWh is charged (or more), compared with 33p for home charging. This is relevant to RUC because all of the margin available for RUC has been lost. Petrol and EV energy costs now seem to be at about the same level, of 18-20p/mile. So if we cut fuel duty to bring in RUC, but allow EV power costs to rip, how will slapping a national road pricing scheme on top be accepted by EV drivers? Can London do anything to regulate or influence the soaring price of EV energy?

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

This issue of taxation has been discussed in the previous question, as changes are constrained by local, and national practices operated by the all-powerful Treasury. The purpose for introducing any RUC policy should be clearly known, so that price of mobility is well understood and more possibly amenable to acceptance.

Looking at the impact of road vehicles on the UK environment and economy, we can add up all of the costs not just from road building and maintenance but also from congestion, toxic emissions, CO2, noise, health and medical care, police and safety - and readily work out that it's worth well over £100 billion compared with the £35 billion or so collected from fuel and vehicle taxes.

These arguments have been rehearsed at length at Parliamentary level for decades. At local (TfL) level there is little ready access to much of this largesse, so budgets for PT and infrastructure improvement must be derived from central taxation and charges allowed via central legislation. Within these constraints, TfL has to improve services and create incentives to change behaviour. Such improvements are likely to reduce the high level of external costs attributable to vehicles which might also reduce if EV take-up is in line with government hopes; this will also reduce overall costs in cities clogged with vehicles and the consequences of their

use.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

If the point is to reduce congestion, or reduce death rate from toxic emissions, or to contribute to climate measures, the priority is to ensure that people do not need to ride in polluting vehicles. It begs the question to make charging 'smarter' if you then decide to decide to dilute its impact because you haven't provided the associated transport links. Carts and horses – which came first?

Allowing some exemptions may be seen as necessary but in such case, the measures should implemented in such a way that the targets set can still be fully achieved.

There may be a range of priorities. In Dublin one priority is for needed HGV and delivery services to use the port tunnel freely and to take precedence on the M50 orbital; private cars will increasingly be discouraged. Therefore HGVs don't travel through Dublin's fair city – they ride down the multimillion tunnel free of charge, while a car driver pays a premium rate for the privilege.

RUC is a part of the cost of living. If people are on lower incomes than has been determined to be a living wage, the solution is to increase the minimum wage, or invest in better mobility for given areas. Disabled people who drive might tend to be entitled to modern vehicles via a national scheme, so their cars will take up space but will be less polluting. If society wished to invest in better mobility choices for those who are disadvantaged this could be not only fairer, but also might enable environmental goals and city congestion targets to be met.

There is little point in setting targets and then making the needed measures less effective by rebating costs to users of polluting vehicles, unless there's really no other option. That said, life is analogue and people have to be pragmatic. But eroding the very solution you propose is a bad start.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

There really seems to be no need for a trial. The technology works. The problem is political. The UK should work with other countries to align standards and learn best practice. Almost all of the UK's major tolls are designed and operated by European or US companies. It's time for the real thing, not a rehearsal for the Faragists to take pot shots at for another decade.

London is not a typical city. She has a well-developed public transport system, and a relatively low level of vehicle usage. Better to use examples of cities where 70-80% of people currently need to drive to work, and explore the ways we can all reach a sustainable outcome for our communities.

It will of course be very advantageous for the UK and its cities to cooperate closely with other nations, who are all on a similar journey. The UK relies on EU industry for the majority of its RUC systems, and common problems require each to move in the same general direction. Most countries have developed strategies towards sustainable transport which involve RUC for commercial and private vehicles, and the EU promote RUC policies as a means to counter threats to climate and health. A nearby starting place is with Ireland, where Project BRUCE has been conceived, its ten-year horizon utilising RUC to help towards environmentally, socially, and economically sustainable outcomes.

Tax revenues from fossil fuels will reduce, leaving a fiscal gap. Cities all need to limit access to private vehicles, and are moving at different speeds, and with varying will power, to achieve a sustainable result. Above all, the threat from climate change is real, and populations cannot live in denial, or allow wishful thinking to encourage inadequate action.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

I don't know. It depends on what the charge is meant to achieve.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

Any referendum should not be about RUC. It should be about the plan for the city, of which RUC would be a small element. Proposed schemes founder because (Manchester, Edinburgh) the debate centres on the payment of the fee, and the reason for introduction is not well-enough presented. The debate should focus on what is actually necessary to achieve, and once the goal is decided, the debate is then about how it's to be paid for. But a referendum on some part of the picture will be in danger of ignoring the scenery.

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

I think this is too large a question to answer in limited time. Examples are mentioned above, and can be further discussed if desired.

The scope here ranges from national schemes for universal road pricing to individual city plans. In general most European national schemes have concentrated on HGV tolling, while networks of tolls within countries such as France, Spain, Portugal have created major revenues for infrastructure by tolling all road users. London has during the past twenty years taken a lead in applying RUC in a major city, two Mayors having initiated and currently led a focussed and successful programme.

In Ireland the National Transport Authority is undertaking a demand management study for the Greater Dublin Area, working together with the national strategy of Transport Infrastructure Ireland. Kilometre-based tolling is becoming the norm in Europe, with the planned phase-out of vignette-based charging for trucks, to be followed by movement towards universal location-based services.

EU policy makers see RUC as one of the tools to achieve a climate-neutral EU by 2050, with a collective net greenhouse gas emissions reduction target of at least 55% by 2030 compared to 1990, while facing new mobility challenges.

Their policy stance is that road users must properly recognise the social costs of private transport, and that "effective pricing policies can drive significant, positive impact in cities by reducing congestion, climate emissions and local air pollutants, and increasing the use of transit and active modes of transportation. Citizens and visitors would breathe cleaner air, not lose time in transit and experience an improved quality of life."

The way forward is challenging and requires leadership, careful design and determination to succeed. Mostly there is a realisation that the mobility of people and not their vehicles is central to the success of future plans. All communities should have adequate access to affordable transportation choices, and leaders in countries including France, Ireland, Spain, Portugal and Italy have already shown how road pricing can make a high contribution to building a sustainable transport system. Excepting TfL, the UK is unfortunately not in the vanguard here. We can gain much by cooperation with neighbours whose relationships are also vital for our cultural and economic wellbeing.

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Response from: Logistics UK

Reference	RUC510

Call for Evidence: Smart Road User Charging – Feb 23
1
Summary: Principles for Smart Road User Charging in London
• London should avoid adopting a smart road user charging system before a nationwide system is in place.
• One single system would be preferable to the current multiple road user charging systems.
• All motorised vehicles should be included in the charging system.
• Traffic reduction strategy should be targeted at private motorists and not automatically apply to freight movements.
• The smart charging system must be simple to administer, interoperable around the UK, allow automated payments, and be governed in a transparent and fair way.
• An independent regulatory body should set road user charging rates.
• To be carefully phased in as alternative fuels take the place of diesel, to avoid double taxation with fuel duty.
• Funds raised to be ring-fenced to ensure adequate funding for road infrastructure, to deliver improvements to road maintenance and reduction in periods of disruption (eg roadworks/incident recovery).
About Logistics UK
Logistics UK is one of the country's largest business groups, supporting, shaping and standing up for safe and efficient logistics. We are the only organisation representing the entire logistics sector. We represent a sector delivering an increasingly innovative, productive and sustainable system of essential national infrastructure. This system ensures the availability of the products that households, businesses and public services rely on every day, and is supporting the UK's transformation for the future. Our membership of over 20,000 includes global, national and regional businesses and SMEs spanning the road, rail, sea and air industries as well as the buyers of freight services, such as retailers and manufacturers.
Background
For an efficient logistics industry, free flowing roads with minimal delays are crucial. Road freight is an essential enabler of all business activity: in 2020, road accounted for 89% of all freight traffic, playing a crucial part in the UK's supply chain1. It also plays a key role in facilitating and supporting other freight modes. Transport infrastructure spending continues to be needed to improve roads across London and nationally, to enhance capacity and reduce unreliability. Appropriate policies and funding are also needed to help provide facilities for drivers to attract sufficient human resource to the industry.
There is an inherent transport cost in everything we buy. As the UK recovers from the global pandemic, we are now faced with a cost-of-living crisis. According to Logistics UK's Manager's Guide to Distribution Costs, total operating costs for a 44-tonne articulated truck increased by 13.3% in 12 months to October 2022, due to increased fuel prices (our members' biggest cost) and upward pressure from wages as the industry experienced an acute driver shortage, with the average 44tn truck driver wages increasing by an average 8.3% in same time period. At the same time, there was a 10.5% increase in the Consumer Prices Index (CPI) inflation rate in the year to December 2022, which raised most other input costs.
The UK Government has decided to gradually phase out petrol and diesel vehicles from the UK over the next few decades. This policy decision will reduce and eventually eliminate tax revenues from Fuel Duty. Our expectation is that the Government will introduce a form of Road User Charging (RUC) rather than lose this important source of tax revenue so any smart charging scheme introduced regionally must be developed in cooperation with national government.
There are many ways to structure a smart user charging system, which offers decisionmakers a flexible tool to help deliver policy outcomes from the road transport network. Charging rates could, for example, be varied depending on the type of road, time of day, amount of congestion, environmental performance of the vehicle, and other factors. It must, however, be a single national charging system, as opposed to multiple

regional systems that are fragmented, costly to maintain and implement.

1 GOV.UK Statistical data set: Freight (https://www.gov.uk/government/statistical-data-sets/tsgb04-freight)

2

Principles

Avoid multiplication of charges/taxes/levies

The UK has the highest fuel duty rates in Europe, which acts as a distance charge and also strongly incentivises logistics efficiency and better environmental performance. Charges should support the uptake of alternatively fuelled/zero emission commercial vehicles to help build the investment case for businesses. However, it should be recognised that some parts of the supply chain are more difficult to decarbonise. Whilst innovation is taking place to produce zero tailpipe emission HGVs, it will take some time for the market to fully develop and put in place the appropriate refuelling and recharging infrastructure. Consequently, the government has set later phase-out dates for the sale of new non-zero tailpipe emission HGVs, with vehicles between 3.5 tonnes and 26 tonnes having until 2035 and 2040 for HGVs over 26 tonnes. If TfL is to include emissions within the charging structure, there should be recognition of steppingstone technologies that provide greenhouse gas emissions savings, such as CNG, LNG and HVO.

UK HGV operators will this year recommence paying a fee for the use of UK strategic road network – the HGV Road User Levy (RUL) (The RUL was suspended during the Covid-19 pandemic). This is payable on an annual basis for UK-based hauliers, or on shorter time-based periods for those vehicles visiting the country, and is based on vehicle type. No other UK road user pays such a charge.

HGV operators also pay Vehicle Excise Duty (VED) per year for each HGV on their licence, a compulsory annual test fee (that is used to fund DVSA HGV enforcement activity instead of the taxpayer).

The introduction of smart road user charging in London must be done in coordination with the UK government, which controls domestic taxation policy, to avoid the freight sector from facing multiple layers of costs, which will reduce investment opportunity for fleet renewal.

Appoint an independent Regulator to set smart user charging rates

The introduction of smart road user charging would create a system where users pay to access publicly owned infrastructure. This is similar in concept to the rail industry, where users pay the infrastructure manager (Network Rail) to use the network. Prices are set through a control period process and reviewed by an independent economic regulator (the Office of Rail and Road). The introduction of such a smart charging system in London will create a similar situation for road vehicles. Logistics UK would wish to see an independent regulatory body be granted powers to scrutinise and amend road user charging rates. This could be an expansion of the role of an existing body such as the ORR or may require a new body to be set up.

Avoid unnecessary administrative burden

Any smart road user charging system must be simple and must avoid introducing an unnecessary administrative burden. It must be interoperable with a national charging scheme and any others that are established around the UK. The system should allow for automated payments on a fleet-wide scale and be governed in a transparent and fair way. It should also be integrated with other infrastructure and congestion charges that are currently in place, to create a one-stop shop for charging.

Ensure fair treatment across the road sector

The essential value of freight needs to be taken into account in any charging structure and care must be taken to ensure the scheme's aims to deter private car use are not automatically applied to freight. Freight journeys taking place in peak hours should not be penalised as often this is driven by customer need. Whilst congestion reduction is listed as a key aim for a future road user charging scheme in the Mayor's Transport Strategy, this should be targeted at non-essential journeys where alternatives are available, such as walking, cycling or public transport.

Use funds to improve road infrastructure

Funds raised should be ring-fenced to ensure adequate funding for roads spending, to deliver improvements to road maintenance and reduction in periods of disruption, such as roadworks and incident recovery.

Response from: Freedom for Drivers Foundation

Reference	RUC301

TO: London Assembly Inquiry into Smart Road User Charging

21 February 2023
I am responding to the aforementioned inquiry on behalf of the Freedom for Drivers Foundation.
We are a not-for-profit organisation which promotes the interests of road users and aims to educate our supporters and the general public on transport issues. We have several thousand supporters who receive our newsletters and follow our blog. See our web site at www.freedomfordrivers.org for more information.
We have commented extensively in the past on transport issues in London and on the Mayor's Transport Strategy which we have consistently opposed as it imposes major costs on vehicle owners and has little rational justification.
We have attempted to answer your questions below:

1. Do the current road user charging systems in London require reform?
Answer: Yes because the Congestion Charge and ULEZ/LEZ systems are of course remarkably stupid where the charge is only payable once per day however many times a vehicle drives into the zone or how far they travel. This has encouraged the use of Private Hire Vehicles and taxis which have increased enormously in numbers as a result, thus adding to congestion. Neither does it encourage low emission vehicles or discourage high emission ones.
Nor does it discourage travel at the busiest times of day as the charge is the same whenever you travel. So there is little benefit in reducing congestion.

Nor is there any concession to people who need to travel within the zone for medical reasons (several major London hospitals lie within the zone and although there is a refund claim system for NHS patients it is complicated to make claims). Nor for any other people who provide essential services such as social carers or plumbers/electricians.
The original justification for the Congestion Charge was that it would solve London's perennial road traffic congestion (environmental benefits were not an argument used because it was known they would be minimal). But it did not solve the congestion problem with that soon returning to the same level as before and subsequently becoming a lot worse. The environmental claims made by some have also been shown to be false with air pollution within the zone basically unchanged as a result. Neither does it raise any significant funds for public transport improvements because almost all the revenue from the scheme goes in operating costs. Indeed if it was not for the accidental fines people collect from forgetting to pay the charge, it would probably lose money. Enormous costs are imposed on the road users with no benefits, so it has just ended up being simply a tax but a very expensive one to collect.
2. How might smarter road user charging differ from the current daily charges for driving applied in London?
Clearly we need a system that is cheaper to operate but which reduces

traffic congestion.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

We are not opposed to road user pricing per se, but it certainly needs to be a more intelligent system if it is to gain public support. Charges need to relate to which roads are travelled or which are most congested at the time chosen to travel. The total costs imposed on users should not rise. As regards discrimination between different types of journeys or the users this is a much more difficult proposition. There might be specific categories – for example registered disabled, those undertaking medical treatment or providing medical services but this would require a great deal of thought. In general wider discrimination would not be easy because a key principal should be to keep the system simple so that it is minimal cost.

4. What strategies and targets could smarter road user charging support?

The target should simply be a system that reduces congestion.

Note that it is important that any system is justifiable on the basis of a cost/ benefit analysis. Past proposals in this area have not been shown to be economic and the current charging schemes are clearly not cost effective solutions.

5. What technology could be used to support smarter road user charging?

A system of smart tags that enabled vehicles to be tracked across London would be one solution, although the problem of recording those visitors from outside London would remain. Solely relying on cameras is not a good solution as it is very expensive to install and operate, plus is prone to errors and vulnerable to licence plate cloning.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

It will have no possible impact on climate change. Even if one accepts that air pollution in terms of carbon emissions has an impact on climate change, which many people do not, the influence on world carbon emissions from those in London is already less than 1%.

Intelligent road user charging might have some impact on air pollution but vehicles are already becoming very clean and are likely to be even cleaner by the time any smart charging scheme could be introduced. The primary benefit, indeed probably the sole benefit, would be in reducing congestion which is a major cost imposed on the economy.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

A national system would be preferable to ensure it was comprehensive.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

It should certainly replace the existing Congestion Charge and LEZ/ULEZ systems in London. A national system could also replace VED taxation and fuel taxes.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

I suggest there should be very few exceptions. The only categories with any exemption or discounts should be the disabled or those attending medical appointments. The system needs to be kept very simple.

10. If the Government were interested in a national distancebased road user charging scheme, would London be a sensible place for a trial?

No because London is not separate to the rest of the UK and road networks in London are linked to the national network. There is no suitable boundary because there are many roads that bypass the M25 and vehicles could divert to minor roads easily.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

They should pay no more than they do at present (including VED and other taxes). Ideally a national scheme would replace VED and fuel taxes (as fuel taxation is being undermined by the growth in electric vehicles).

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

A referendum is certainly required if there is going to be public support for a scheme. This would need to be based on specific and detailed proposals for how the scheme would work.

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

We are unqualified to answer this question in detail but Singapore appears to have an effective system already in place but in a very different environment to a major city such as London.

Response from: Business LDN

Reference	RUC2911

Dear Transport Committee,

Further to the oral evidence given to the Committee on this subject, we would like to submit our recent think piece on the future of road user charging in London as evidence. This highlights the need to focus on making achievable progress - which may be more incremental that some of the proposals for a fully fledged pay-per-mile scheme - and to ensure that tackling congestion is at the heart of any scheme design. It also discusses some of the "carrots" that could be provided alongside the "stick" of road pricing in order to achieve the economic and environmental outcomes that any such scheme would be looking to target.

The full document, Changing Gears, can be found here: https://www.businessldn.co.uk/sites/default/files/documents/2022-04/Changing%20Gears%20-%20London%20First.pdf

As ever, please do not hesitate to contact us if you have any further questions or would like to explore any of these issues in more detail.

Response from: British Vehicle Rental and Leasing Association

Reference	RUC2924

BVRLA consultation response

Proposed expansion of the Ultra Low Emission Zone (ULEZ) London-wide in 2023

British Vehicle Rental and Leasing Association (BVRLA) members represent the demand-side of the automotive industry, buying around 50% of new vehicles, including over 80% of those manufactured and sold in the UK. In doing so, they support almost 500,000 jobs, add £7.6bn in tax revenues and contribute £49bn to the UK economy each year.

The BVRLA is fully supportive of the Mayor's proposals to help improve air quality, tackle climate change and reduce congestion through the expansion of the Ultra Low Emission Zone (ULEZ).

BVRLA members are in a prime position to support the Mayor's office and Transport for London (TfL) through offering ULEZ compliant vehicles and helping remove the need for a privately owned car, complementing the use of public transport and more active travel.

The BVRLA's Fleet Sustainability Credentials show how 100% of rented and car club cars and 99% of rented vans are ULEZ compliant. The average age of the car fleet is just eight months compared with nine years for the average privately owned car. Rental vans are 1.5 years-old compared to eight years for the average van.

Expanding the ULEZ London wide by 2023

Removing privately owned vehicles

BVRLA members have a critical role to play in supporting a reduction in the number of privately owned vehicles. The latest research from CoMoUK[1] shows how 24 privately owned cars are replaced for each car club vehicle. It also shows how those who use car clubs are more likely to use public transport and active travel options. Research into those who rent vehicles[2] has also found a shift away from private ownership with more trips being done by public transport, walking and cycling.

We are grateful for the recognition of car clubs as a sustainable mode of transport and for the work being undertaken to support car clubs but would like to see this support extended to all shared mobility providers, including rental operators. This support will be essential if we are to work collectively to influence a shift away from private vehicle ownership. This is especially important in outer London where lower levels of public transport availability may make people less willing to give up their private vehicle.

There is evidence of people being more inclined to give up their private vehicle when they can see car club/rental schemes in operation and where they can be provided with the assurance that a vehicle will be there for them when it is needed. Giving customers confidence that there are a range of vehicles which offer a mix of rental lengths depending on their needs, be they short-term (for example car clubs that offer rental by the minute/hour) or longer term (for example by the day or for a weekend visit to see family), will be critical if we are to influence the behaviour change necessary.

There are various ways that the Mayor and TfL can support the growth of shared mobility solutions and which build on the welcome commitments being progressed for car clubs, such as:

- Supporting the growth of electric vehicles,
- Promoting the role car clubs can play and incorporating this into communications and policy messaging/development
- Involving operators in discussions on how they can benefit from 3rd party offers/a mobility credits scrappage scheme.

[1] CoMoUK-Car-Club-Annual-Report-London-2021_final.pdf

[2] BVRLA TRL Rental Customer Survey BVRLA PDF_Reports_BVRLA TRL Rental Customer Survey Report_2015.pdf

The additional support the shared mobility sector would like to see includes:

- A revision of the London Car Club Strategy which sets out how shared mobility operators will be supported and what policy measures will be put in place to ensure continued growth across London
- Providing additional bays that provide a clear signal that schemes are in operation and that a car will be available when someone needs it
- Messaging which supports all shared mobility solutions along with walking, cycling and the use of public transport and which promote the value of both short and longer-term rental i.e. a trip to see family at a weekend
- Working with operators to understand their roll out plans and where EV infrastructure will be best located
- Collaborating with shared mobility operators to assess where schemes will have most impact and how growth can be supported i.e. in new builds with limited or no parking and S106 agreements
- Supporting the growth of mobility hubs which combine a range of mobility solutions in one place to provide better connectivity and consumer choice
- Working closely with operators delivering Mobility as a Service (MaaS) offerings which link in with existing payment mechanisms to provide a seamless experience for consumers and which encourages them to make more sustainable transport choices
- Developing a Mobility Credits scrappage scheme which allows for growth in all shared mobility solutions
- Removing the £10 Auto Pay administration fee per vehicle – this will remove a significant cost burden on the operators
- Reducing the burden of Penalty Charge Notices through the development of new systems and processes

An innovative approach

Whilst the benefits of moving people away from private car ownership are clear, the size of the challenge cannot be underestimated. Supporting Londoners to make the shift to more sustainable modes will require close collaboration across a range of partners and requires a fresh and innovative approach, such as the introduction of a mobility credits scrappage scheme.

Such a scheme will reduce congestion and tackle air pollution, by taking polluting vehicles off the roads. By offering mobility credits in exchange for a household scrapping their old polluting vehicle, the scheme advances the shift away from private car ownership and increases the availability of roadspace in crowded urban areas.

A mobility credit scrappage scheme sees individuals receive a credit payment which can be redeemed against travel journeys with a range of transport providers, including car rental/car clubs, in return for scrapping their car. This can then be used to shift people's behaviour away from private car ownership and can be designed in such a way to promote public transport and active travel options.

As well as dramatically improving air quality by removing the use of a privately owned car, a mobility credit scheme improves the health of its participants by encouraging more active travel and use of shared or public transport.

A mobility credit scheme takes advantage of new technologies such as MaaS platforms, which can be fully integrated with mobility credits to incentivise sustainable forms of travel and improve journey efficiency. By offering a strong incentive for city dwellers to scrap their vehicle and use more public transport and active

and shared forms of travel, a mobility credit scheme 'nudges' the participant into a long-term behavioural change, offering advantages that reach beyond the use of a more traditional scrappage scheme.

Whilst mobility credits are a fantastic way to encourage a move away from private ownership, not everyone will be able to give up their privately owned vehicle, particularly those who run commercial vehicles. There will therefore need to be consideration of how the mobility credit scheme could work for commercial vehicles or whether there are alternatives which may be better suited for commercial vehicles but still incentivise consumers to reduce their reliance on older non-compliant vehicles.

Road User Charge

Whilst we can see some benefits to combining the ULEZ and congestion charge into one charge, the development of a road user charge will require very close collaboration with industry stakeholders, particularly those who will be instrumental in helping the Mayor meet his aims of reducing congestion and improving air quality through the removal of private car ownership.

If based on a pure pay per mile basis this system will have a detrimental impact on shared mobility operators who are fundamental to the Mayor meeting his aims through the reduction in private car ownership.

At this early stage, we cannot say whether TfL's vision for road pricing is something we would be willing to endorse but we recognise TfL's continual efforts to reduce congestion and improve air quality in London and would like to be a key partner in discussions moving forward to ensure that:

- The process for developing a road pricing scheme is collaborative with industry and has reasonable timeframes
- The remit of any future charge is purely focused on addressing the triple challenge of air pollution, congestion and climate change and this scheme is not confused with any national road user charging scheme being developed by central Government to replace a loss in fuel and motoring taxes
- That shared mobility providers are treated differently from private car owners to acknowledge the critical role that they play in reducing reliance on the private car and they are encouraged through suitable exemptions/ discounts
- There are differences in the charge not just based on mileage but also type of vehicle including its emissions performance, age and whether it is private or shared
- That there is significant investment into TfL's systems/processes to ensure that it can meet the technological requirements necessary for a flexible and robust road user charging scheme
- The scheme does not place any additional burden on fleets, that drives the right behaviour and that can be flexed to meet different fleet users' requirements i.e. who pays the charge and how

About the BVRLA

The BVRLA represents over 1,000 companies engaged in vehicle rental, leasing and fleet management. Our membership is responsible for a combined fleet of four million cars, vans and trucks – one-in-ten of all vehicles on UK roads.

BVRLA members represent the demand-side of the automotive industry, buying around 50% of new vehicles, including over 80% of those manufactured and sold in the UK. In doing so, they support almost 500,000 jobs, add £7.6bn in tax revenues and contribute £49bn to the UK economy each year.

Together with our members, the association works with policymakers, public sector agencies, regulators, and other key stakeholders to ensure that road transport delivers environmental, social and economic benefits to everyone. BVRLA members are leading the charge to decarbonise road transport and are set to register 400,000 new battery electric cars and vans per year by 2025.

BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.

The association achieves this by reinforcing industry standards and regulatory compliance via its mandatory Codes of Conduct, inspection regime, government-approved Alternative Dispute Resolution service and an extensive range of learning and development programmes.

Response from: Muswell Hill and Hornsey Friends of the Earth[1]

Reference	RUC2759

Dear Assembly Transport Committee

Please see below Muswell Hill & Hornsey Friends of the Earth's response to your consultation on smart road user charging.

Thank you

1. Do the current road user charging systems in London require reform?

Yes. The Committee on Climate Change recommend a# 37% cut in UK car emissions by 2030 (p.7). Tackling the climate emergency requires a substantial reduction in vehicle milleage. If London brings in road charging targeting greenhouse gases, this would set a great example for other world cities, particularly because Sadiq Khan is currently chair of the global group C40 Cities.

We should remember the survey findings that about 42% of miles travelled in England are for leisure, and that higher income families drive much further than drivers in poorer households. Therefore greenhouse gas emissions from cars could be substantially reduced without causing deprivation.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

It would charge per mile, with the charge varied according to pollution level of the particular vehicle, the convenience of public transport in that area, and the level of congestion in the area at that time of day.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

Emissions of carbon dioxide and other pollutants should not be ignored on the grounds that the journey is regarded as important. It would probably be

appropriate for employers to pay the charge if their employees had no other travel options besides driving. However there may be exceptional situations such as unpaid carers (e.g. relations) travelling to provide vital care whose need for a temporary exemption from charges and/or a scrappage grant could be assessed.

4. What strategies and targets could smarter road user charging support?

Cutting greenhouse gases and other air pollutants substantially, and reducing congestion.

5. What technology could be used to support smarter road user charging?

GPS technology built into many cars, including all new cars, is already available for privacy-friendly smart road charging, and used in various places such as Washington State (p. xvii). Drivers reluctant to use this could have the alternative of paying a fixed annual charge, linked to the mileage recorded on their previous three MOT certificates, but set at a somewhat higher rate.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

It would do so by cutting traffic and emissions, giving drivers an incentive to drive fewer miles, and would also cut congestion. International research shows that even quite modest road user charges can stimulate a significant proportion of people to drive less.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

A national system would have the advantage that drivers everywhere would be familiar with it and would be able to make travel choices easily by taking it into account. However because we face a climate emergency London should not shelve this vital issue by relying instead on a national government, as it is difficult to predict when the government would introduce such a scheme. Moreover as stated above, if London introduced a scheme relatively soon this would encourage other cities to do likewise, by showing that road user charging is regarded as important and feasible.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

If there was a national system it would be logical for the charges to replace fuel duy and vehicle excise duy. However it is likely that government would hesitate considerably before deciding to replace these relatively predictable revenue streams. This is another reason why London should move forward and start its own scheme as soon as possible. The scheme would be comprehensive and therefore would replace the Congestion Charge, LEZ and ULEZ.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

There should be a reduction or an exemption for a temporary period for those living in areas with inadequate public transport, until the public transport is improved to a suitable level. People on low incomes should be able to obtain a scrappage grant, and there should be sufficient notice before the scheme begins to enable people to obtain a grant and prepare for whatever alternative transport method they choose. Organisations representing disabled people should be consulted. Depending on the level of disability, certain people may require a larger scrappage grant than the amount applicable for people on low incomes.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

Because it is so urgent to cut greenhouse gas emissions, it is vital that drivers should pay substantially more per mile than at present. The scheme should include predictable incremental increases in the per mile charge, in line with the gradual improvement in public transport in areas in which it is currently insufficient. This would also help drivers to prepare for the alteration in their travel habits.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

Elected politicians need to live up to their responsibility to tackle the climate emergency without delay. London politicians should be aware of the findings that nearly two-thirds of Londoners think that “motorised transport” makes a large or very large contribution to climate change. Only one in six say they would not consider using public transport instead of driving (p.20). Seven out of eight say they are motivated to help prevent climate change. It would be appropriate to run a consultation about the different options to achieve the target level of emissions cuts, with particular reference to the transition process and to the needs of disabled people.

Friends of the Earth
Muswell Hill and Hornsey

[1] Submission not included in original publication, amended to include.