



Increasing the fine level for drivers who fail to follow the rules on TfL managed roads

Consultation Report
December 2021

MAYOR OF LONDON

TfL RESTRICTED



**TRANSPORT
FOR LONDON**
EVERY JOURNEY MATTERS

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Executive summary

Between 5 August and 19 September 2021, we held a public consultation seeking views on a proposal to increase the level of our Penalty Charge Notice (PCN) for people who fail to follow the rules of the red route network (i.e., the roads we manage in London). This road network is known as the Transport for London Road Network (TLRN).

Our priority, in managing the TLRN, is to keep traffic moving safely. When people do not follow red route signs and road markings – red route restrictions - it creates safety risks, disrupts traffic, and creates congestion for everyone. To minimise this we use enforcement tools, and issue penalties to encourage everyone to follow the rules of the road. Income we receive from PCNs is used to cover the cost of enforcement, and any surplus is reinvested in improving roads and transport in London.

It is important that the level of the PCN for contraventions on the TLRN remains an effective deterrent. We considered that a proposed increase to the PCN level for contraventions would be a more effective deterrent that would, over time, lead to a reduced level of contraventions.

We proposed a PCN level increase from £130 to £160, reducing by half to £80 if paid within 14 days. The cost of our PCN was last increased in 2011. A proposed increase to £160 would see the cost of the fine brought into line with inflation.

We asked members of the public and stakeholders how effective a proposed PCN increase to £160 would be in reducing contraventions on the TLRN. We also asked respondents to tell us about any difficulties or hardships the proposed increase might cause, and whether this might unfairly penalise any particular road user groups.

We received 2,573 responses to the consultation. Of these, 2,541 were from members of the public and 32 were from stakeholders. We asked respondents if they thought the proposed PCN cost of £160 was sufficient. There were 2,272 responses to this question. Overall, 65 per cent of respondents considered the proposed PCN cost of £160 was too high to act as an effective deterrent; 17 per cent considered it was sufficient to act as an effective deterrent, and 17 per cent considered the cost of £160 was not high enough.

General comments opposing the increase raised concern that the increased cost would lead some to financial stress. Also, that the proposal was designed to generate income. Comments in support of the proposal considered it was important for the penalty to be set at a sufficient level to enforce the rules.

A detailed analysis of comments received can be found in section 1 and Appendix A of this document. Stakeholder comments can be found in section 1.3.2 and in Appendix F.

1. Summary of consultation responses

We received 2,573 individual responses to consultation.

Respondents were asked to state if they were representing an organisation (i.e. a stakeholder). Of those who responded to this question, 2,541 respondents were members of the public and 32 were stakeholders; 18 respondents did not respond to this question. For reporting purposes, these 18 respondents have been considered as public respondents.

Chapter 3 on page 12 summarises further information about our respondents.

Table 1: Type of consultation respondent

Respondents	Total	%
Public responses	2,541	99
Stakeholder responses	32	1
Total	2,573	100

1.1 Summary of responses to Question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

1.1.1 Overall summary

There were 2,272 responses to this question.

We asked respondents to select one answer from the following options:

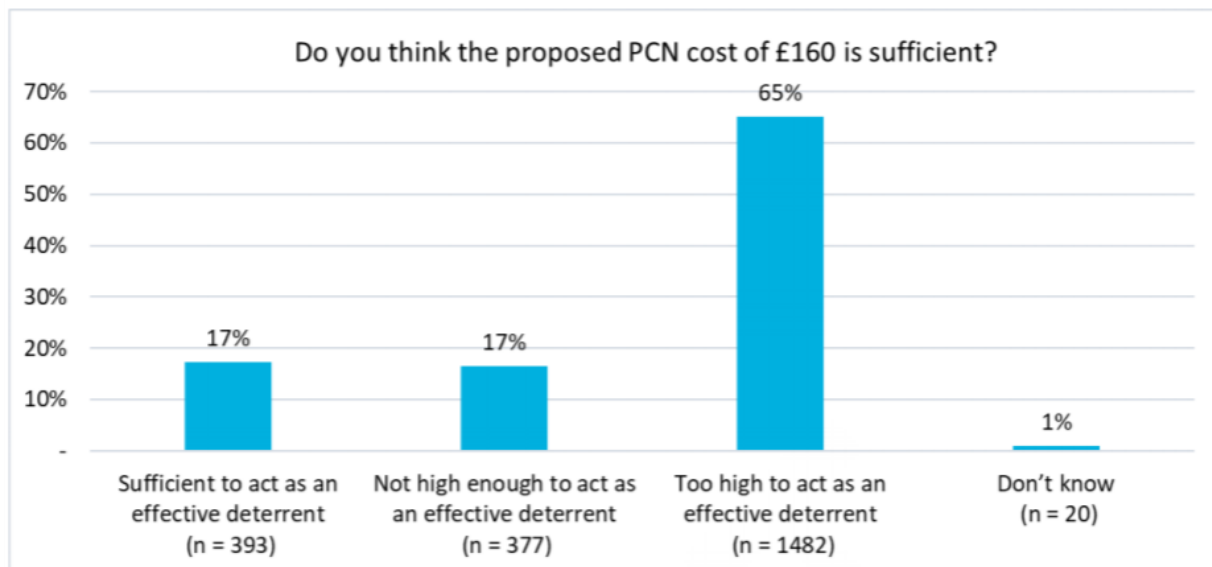
- Sufficient to act as an effective deterrent
- Not high enough to act as an effective deterrent
- Too high to act as an effective deterrent
- Do not know
- No opinion

Of the 2,272 respondents who answered question one, 1,482 (65 per cent) considered £160 was too high to act as an effective deterrent, 393 (17 per cent) considered it was sufficient to act as an effective deterrent, and 377 (17 per cent) considered it was not high enough to act as an effective deterrent.

The results shown in Figure 1 below include all responses from people that had a view on this aspect of the proposal, including any stakeholders that responded via the online questionnaire.

We have excluded those who did not answer the question, or who selected 'no opinion.' The more detailed stakeholder analysis can be found later in the report, in section 1.3.2 from page 7.

Figure 1: Do you think the proposed PCN cost of £160 is an effective deterrent?



1.2 Summary of responses to question 2 (open question): Would the increase in the cost of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users?

Of the 2,573 responses to the consultation, 2,202 (86 per cent) provided their thoughts on this question.

There was a total of 2,175 individual responses from the public and 27 responses from stakeholders.

Many respondents made multiple comments within their answers, therefore the total number of comments or issues identified is greater than the total number of responses received.

Every response to the open question was read in full. All comments have been summarised and analysed based on the frequency that the comment was expressed, guided by a code frame.

1.2.1 Issues commonly raised by members of the public

To summarise the results, the 10 most common comments or issues expressed by members of the public answering open question 2 is shown below. We have grouped the comments into six separate themes, as follows:

- Support
- Opposition - general
- Opposition - financial
- Opposition - deterrent
- Opposition – equality
- Suggestions

A copy of the code frame and a detailed analysis of comments received is provided in Appendix A.

Table 2: Top 10 comments from members of the public in response to open question 2

Would the increase in the cost of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users?

Theme	Comment	Number	%
Opposition - Financial	Concern that the proposed charge is too high / expensive / would cause financial stress	498	23
Opposition - Financial	Concern that the proposal to increase PCN charge is a money-making tool	426	20
Opposition - General	Concern that the proposal to increase the PCN charge is unfair on individuals (e.g. visitors) who accidentally contravene	317	15
Opposition - Deterrent	Concern that the proposal to increase PCN charge is unnecessary / existing charge is sufficient / already too high / should remain at existing charge	298	14
Support	Support proposal / no concern about proposal	255	12
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who use/need to use motor vehicles (general, not related to employment)	192	9
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages protected characteristic groups as it will negatively impact lower income groups	188	9

Theme	Comment	Number	%
Opposition - Financial	Concern about the cumulative impact of other charges / restrictions	178	8
Opposition - Financial	Concern about time of implementation during the pandemic / difficult times (e.g. added stress, financial stress)	173	8
Suggestion	Suggest that signage should be improved to ensure users do not contravene due to lack of / unclear signage / suggestion to offer education to avoid confusion	134	6

1.3 Stakeholder responses

This section lists stakeholders that responded to the consultation.

All stakeholder replies have been read and the comments made have been considered as part of our decision-making process.

1.3.1. Stakeholder respondents by category

Local authorities & statutory bodies

The London Borough of Enfield

Emergency services

Metropolitan Police

Accessibility Groups

Camden Disability Action

Elders Voice

Hackney Disability Backup

Transport and road user groups

Camden Cycling Campaign

Campaign for Better Transport

Logistics UK

London Taxi Drivers Association (LTDA)

London TravelWatch

RAC

Road Haulage Association

Railfuture Limited

Southwark Cyclists

The AA

United Cabbies Group

Business groups

Camden Town Unlimited

Federation of Small Businesses

Businesses, employers, and venues

Fox Transport

John Lewis Partnership

Martin Brower UK

MET Parking Services Limited

O'Donovan WD Limited

Post Office Limited– two submissions

Royal Mail Group

Sainsbury's

Town and Country Meats

Local interest groups

Belgravia Residents Association

Better Streets for Havering

STAMP (Shad Thames Area Management Partnership)

Others

Saturday Walkers Club

1.3.2. Issues commonly raised by stakeholders

Of the 32 stakeholders that responded, 27 gave comments in response to question 2. Table 3 below presents the most frequent comments. All comments that were noted by two or more stakeholders have been included below.

While the number of stakeholder respondents is lower than the number of responses from members of the public, analysis has demonstrated support among stakeholders is greater with 33 per cent in support or with no concern about the proposal.

Key concerns expressed amongst stakeholders referred to financial impact. Six stakeholders noted the proposal may disproportionately impact on delivery and freight workers.

A summary of each stakeholder reply is available in Appendix F.

Table 3: Top 10 comments from stakeholders in response to open question 2

Would the increase in the cost of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users?

Theme	Comment	Number	%
Support	Support proposal/ no concern about the proposal	9	33
Opposition – equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor vehicles for employment -delivery / freight	6	22
Opposition - Deterrent	Concern that the proposal to increase PCN charge is unnecessary / existing charge is sufficient / already too high / should remain at existing charge	5	19
Opposition - Financial	Concern about time of implementation during the pandemic / difficult times (e.g. added stress, financial stress)	5	19
Opposition - Financial	Concern about the cumulative impact of other charges / restrictions	4	15
Opposition - Financial	Concern that the proposed charge is too high / expensive / would cause financial stress	3	11
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages protected characteristic groups as it will negatively impact lower income groups	2	7
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor vehicles for employment -non-specific / general business / tradespeople	2	7

Theme	Comment	Number	%
Opposition - Financial	Concern that the proposal to increase PCN charge is not value for money / waste of TfL's money /time	2	7
Opposition - Financial	Concern that the proposal to increase PCN charge is a money-making tool	2	7
Opposition - General	Concern that the proposal to increase the PCN charge is unfair on individuals (e.g. visitors) who accidentally contravene	2	7
Other	Specific request for information (e.g. TfL profit from fines)	2	7
Suggestion	Suggest that there should be some exceptions for businesses / residents that require access to restricted routes (e.g. reduced operating hours, exceptions for deliveries / vulnerable)	2	7
Suggestion	Suggest focusing on enforcement / impose other restrictions (e.g. on cyclists, e-scooters as well as cars)	2	7

2. About the consultation

2.1 Purpose

The objectives of the consultation were:

- To give stakeholders and the public easily understandable information about the proposal and allow them to respond
- To allow respondents to make suggestions
- To seek views on whether the proposal was considered sufficient to act as a deterrent against contraventions on the red route network
- To understand any hardships or other issues which might be caused by proposal, and of which we were not previously aware
- To understand concerns, objections, and any other issues

2.2 Potential outcomes

The potential outcomes of the consultation were:

- Following careful consideration of the consultation responses, the Mayor of London decides to proceed to increase PCN level TLRN contraventions on the red route network, as set out in the consultation
- Following careful consideration by the Mayor of the consultation responses, and subsequent direction to do so from him, we modify the proposal in response to issues raised
- Following careful consideration of the consultation responses, the Mayor decides not to proceed with the proposal

The conclusion and next steps are set out in Chapter 4.

2.3 Consultation history

During 2017 a public consultation proposed an increase to the cost of a PCN from £130 to £160 for contraventions on the red route network, and for non-payment of the Congestion Charge.

The Mayor approved the new PCN costs; however, we were only able to implement the increased cost to Congestion Charge PCNs.

Under the Traffic Management Act 2004, the Secretary of State for Transport can object to an increase in the level set for a PCN issued on the TLRN. In 2018, the then Secretary of State did object, and the cost of the PCN for contraventions on the TLRN could not increase.

A copy of the 2017 public consultation report is available by contacting haveyoursay@tfl.gov.uk, or in writing to Freepost TfL Have Your Say.

2.4 Who we consulted

This consultation was designed to be accessible to everyone particularly those that use the TLRN, including residents and businesses on or near to roads that form part of the TLRN and Londoners in general.

We consulted pan-London stakeholder groups including those that represent people with protected characteristics under the Equality Act, and accessibility, Taxi and Private Hire, coach and bus licensing, freight, and business groups.

We also consulted London local authorities, London TravelWatch, local elected representatives, London Members of Parliament, and Greater London Authority London Assembly Members.

A full stakeholder list can be found in Appendix E: List of stakeholders consulted with.

2.5 Dates and duration

The consultation ran for a period of six weeks and three days from Thursday 5 August to Sunday 19 September 2021.

2.6 What we asked

Our questionnaire was designed to understand views on how effective a proposed PCN level increase to £160 would be in reducing contraventions on the red route network. It was also designed to hear about difficulties of hardships that a proposed increase might cause, including whether this might unfairly penalise any particular road user groups.

The consultation questions can be found in Appendix B: Consultation questions.

2.7 Methods of responding

We made several channels available, through which people could respond to the consultation.

It was possible for respondents to complete a consultation questionnaire by visiting our website: <https://haveyoursay.tfl.gov.uk/penalty-charge-2021>

Comments could also be submitted by email to Haveyoursay@tfl.gov.uk or in writing to FREEPOST TFL HAVE YOUR SAY. Respondents could also complete a large print version of our survey and send this to us by post or by email.

2.8 Consultation materials and publicity

To make members of the public and our stakeholders aware of the consultation we issued a total of 1,217,835 emails and ran a publicity campaign in the London online and paper-based press.

Our dedicated 'Have Your Say' website provided a range of information documents. This included large print formats of the proposal and the consultation questions, maps detailing red routes in London, and audio and video versions of the proposal and consultations in British Sign Language.

We issued a publicity leaflet that could be shared online. We placed online and paper-based press advertisements in publications with coverage across London. There was also a press release.

Emails to members of the public and stakeholders

We sent 1,871 emails to pan-London stakeholders asking for their views on our proposals.

Where possible we asked our stakeholders, including colleagues from London's boroughs to consider publicising the consultation through their own communication channels.

We shared digital copies of our information leaflet, asking that this be passed on as appropriate.

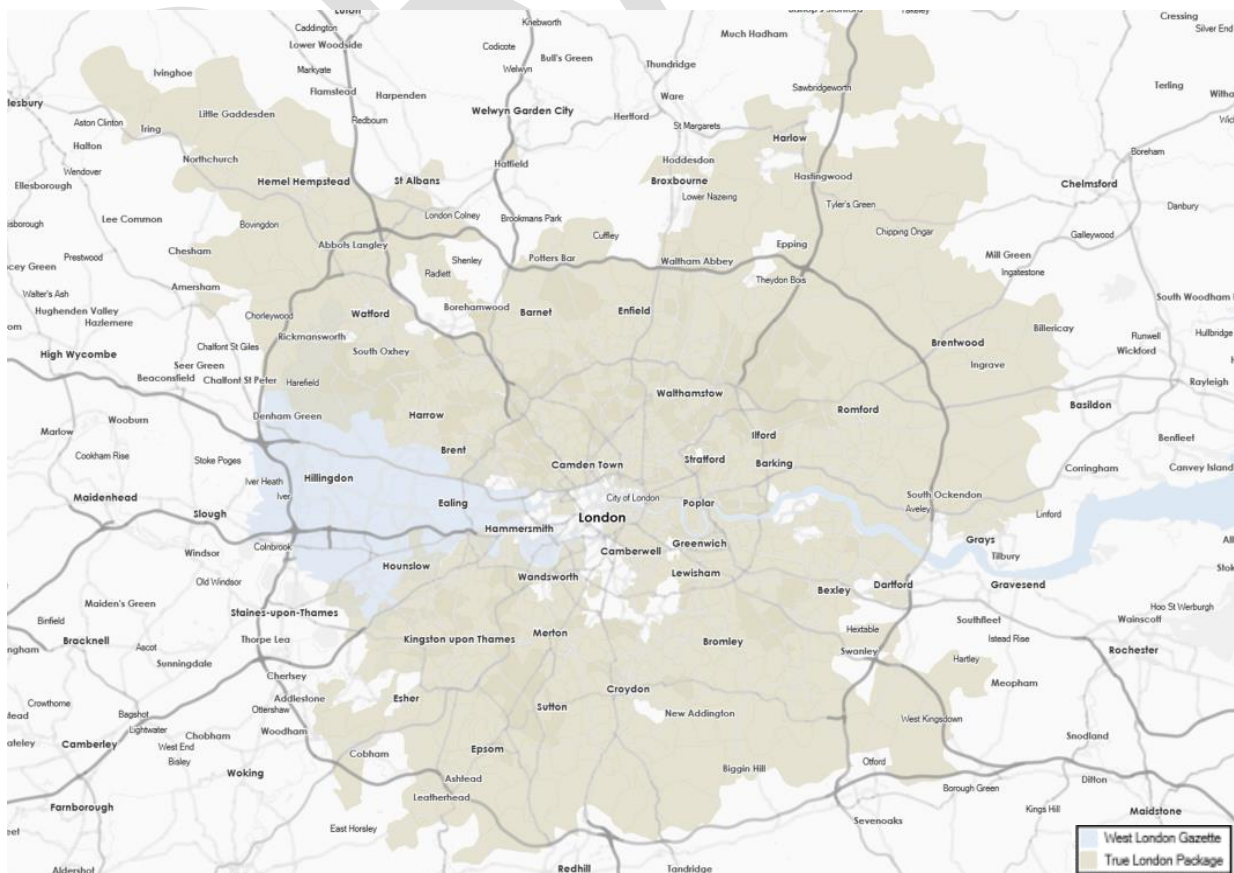
We sent a customer email to 1,215,964 private and commercial road users that had registered to receive updates from us related to driving in London. This extensive database also included those that may live or work outside of London and drive into London.

Media activity and digital advertising

The consultation was promoted through a range of media and social media activities, using web page banners and advertisements, as well as paper-based adverts in the following London media:

- Barking & Dagenham Post
- Barnet Borough Times
- Brent & Kilburn Times
- Bromley News Shopper Series
- Docklands & East London Advertiser
- Enfield Independent
- Greenwich & Lewisham Weekender
- Hampstead & Highgate Express Group
- Harrow Times
- Ilford & Woodford Recorder Series
- Islington & Hackney Gazette Series
- Newham & Stratford Recorder Series
- Romford & Brentwood Recorder Series
- South West London - All Editions
- Southwark News
- Watford Observer
- Your Local Guardian

Figure 2: Map displaying media coverage across London:



Copies of stakeholder and customer emails and publicity leaflets, examples of media activity, digital advertising, and a copy of our press release can be found in Appendix C: Consultation materials.

2.9 Equalities Assessment

An Equalities Impact Assessment (EqIA) was completed for the consultation, and a copy of the assessment was included with the consultation documents.

To encourage participation in the consultation from protected groups, easy read versions of the consultation document and questions were produced and made available for participants. A British Sign Language video was also produced and hosted on our dedicated consultation web page.

Notice of the consultation was sent to organisations that represent people who share a protected characteristic. The consultation was also advertised in both online and paper-based press.

The EqIA of the proposals prior to public consultation found no negative impact to the general public. The assessment noted that if people did contravene, under this proposal they would need to pay a £160 PCN. This amount would be reduced to £80 for those who pay within 14 days. No changes were proposed for the current appeals process and all contraventions would still be able to be challenged within 28 days.

The assessment also looked at a potential short, medium, or longer-term negative impact of the proposals on people, related to their protected characteristics. It found that a proposed increased cost of a PCN could impact on socio-economic deprived communities (i.e. lower income, refugee, homeless people) if they contravened the rules of the road. It also noted that contraventions are not standard practice, and a reduced PCN rate would be applicable if paid within 14 days. The proposed increase was also in line with inflation, which, according to the Bank of England inflation calculator, had averaged at two point five per cent each year since 2011.

2.10 Analysis of consultation responses

The consultation was analysed by external consultants (Steer) through an external supplier contract which was commercially tendered.

Emails received, with free text answers to open questions, rather than completed questionnaires were inputted on the consultation portal by the consultation team. These were then analysed by Steer.

The 'open question' analysis was completed by assigning (or coding) the points made by each respondent to one or more codes within a code frame.

The code frame was developed by Steer and all codes received approval by us prior to mass coding. Any additional codes or changes to existing codes were also approved during the analysis period. Codes were organised by theme (general, financial, equality, etc.), and separated into comments of support, opposition, concerns, and suggestions.

Each code represented a point raised by respondents in their response. This coding enabled the same or similar points raised by multiple individuals (and expressed by individuals in a variety of ways) to be categorised within the code frame. From this it was possible to count how many times the same or similar points had been raised by respondents.

To avoid duplication in the analysis, one code frame was developed to capture responses to open questions 2 and 9, based on a sample of responses.

3. About the respondents

This chapter summarises responses to the demographic questions included in the consultation.

3.1 Number of respondents

As referenced in Section 1, we received 2,573 individual responses to consultation.

Respondents were asked to state if they were representing an organisation (i.e. a stakeholder). Of those who responded to this question, 2,541 respondents were members of the public and 32 were stakeholders; 18 respondents did not respond this question. For reporting purposes, these 18 respondents have been considered as public respondents.

Table 1: Type of consultation respondent

Respondents	Total	%
Public responses	2,541	99
Stakeholder responses	32	1
Total	2,573	100

3.2 How respondents heard about the consultation

Respondents were asked how they heard about the consultation. There were 2,236 responses to this question. Of those who responded, 1,860 or 83 per cent received an email from TfL.

Table 4: How respondents heard about the consultation

How respondents heard	Total	%
Received an email from TfL	1,860	83
Social media	169	8
Read about it in the press	94	4
Saw it on the TfL website	61	3
Other (please specify)	52	2
Total	2,236	100

3.3 Who responded

Respondents were asked who they were responding as and were able to select all options that applied to them. Therefore, the total does not sum up to 100 per cent.

Two-thirds of respondents stated they were a local resident (67 per cent), while one-fifth stated they were employed locally, followed by commuters to the areas (18 per cent).

Table 5: How respondents heard about the consultation

Respondent type	Total	%
A local resident	1,734	67
A local business owner	196	8
Employed locally	505	20
A visitor to the area	239	9
A commuter to the area	464	18
A taxi/private hire vehicle driver	266	10
Not local but interested in the scheme	86	3
Other (please specify)	52	2

3.4 Postcode analysis

Postcode sector analysis was undertaken to understand the geographical distribution of respondents.

In total, 419 unique postcode sectors were reported by respondents. Figure 3 below presents this analysis for the 726 respondents who provided their postcode.

It shows that the postcode sectors with the highest number of respondents were located within London boroughs.

For postcode sectors outside Greater London, in each case there was only one respondent per postcode sector. Only six London boroughs include postcode sectors which were recorded by over five respondents, these were: City of Westminster, Kensington and Chelsea, Hammersmith and Fulham, Ealing, Richmond upon Thames, and Wandsworth.

Figure 3: Map detailing postcodes of respondents

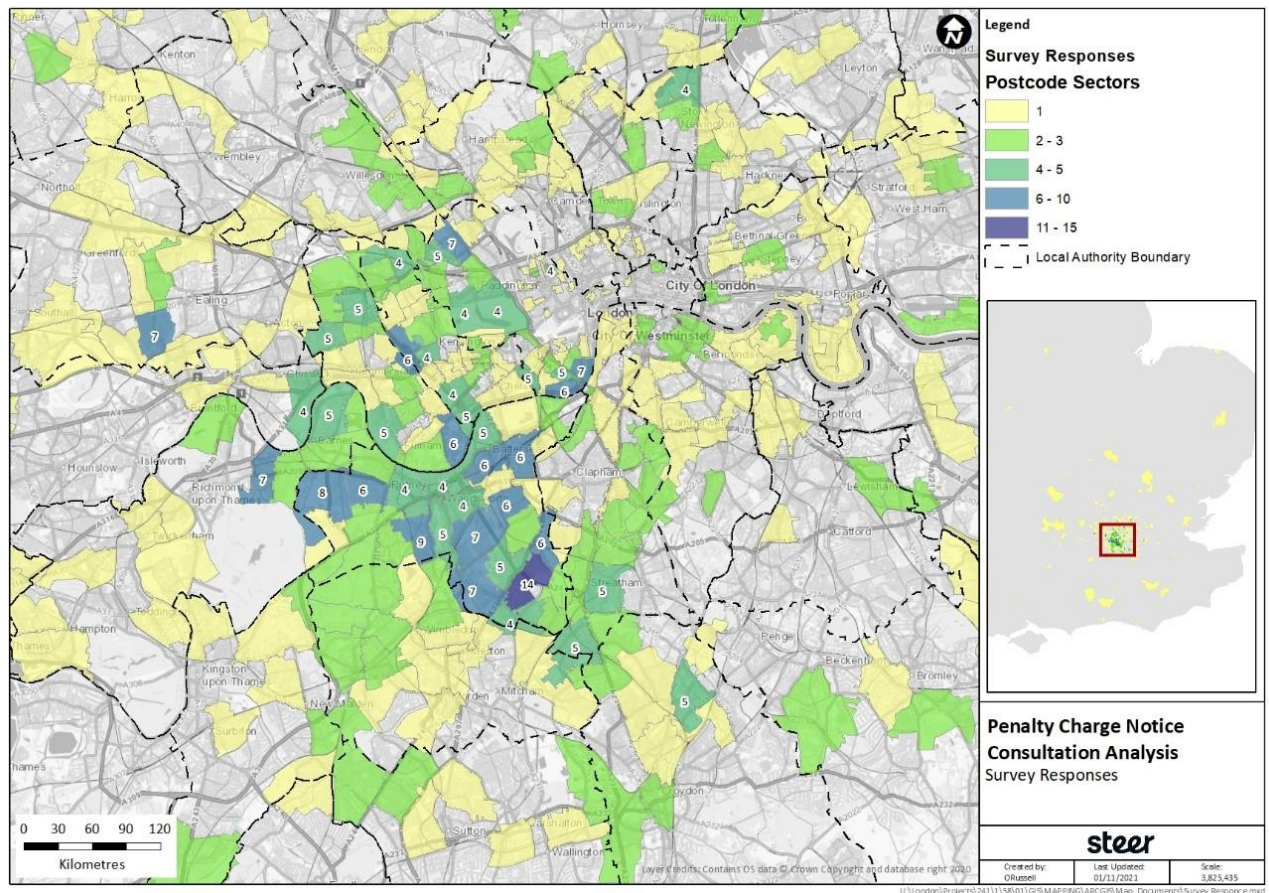


Table 6 below shows respondents by postcode. We have highlighted postcodes provided by 10 or more respondents.

Table 6: Postcodes of respondents where cited by 10 or more members of the public

Postcode	Total
SW17	30
SW18	29
SW11	28
SW15	25
SW16	19
SW6	18
W12	15
W2	15

Postcode	Total
SW19	14
SW1V	14
W9	14
SW1P	12
W13	11
SE1	10
SW13	10
SW14	10

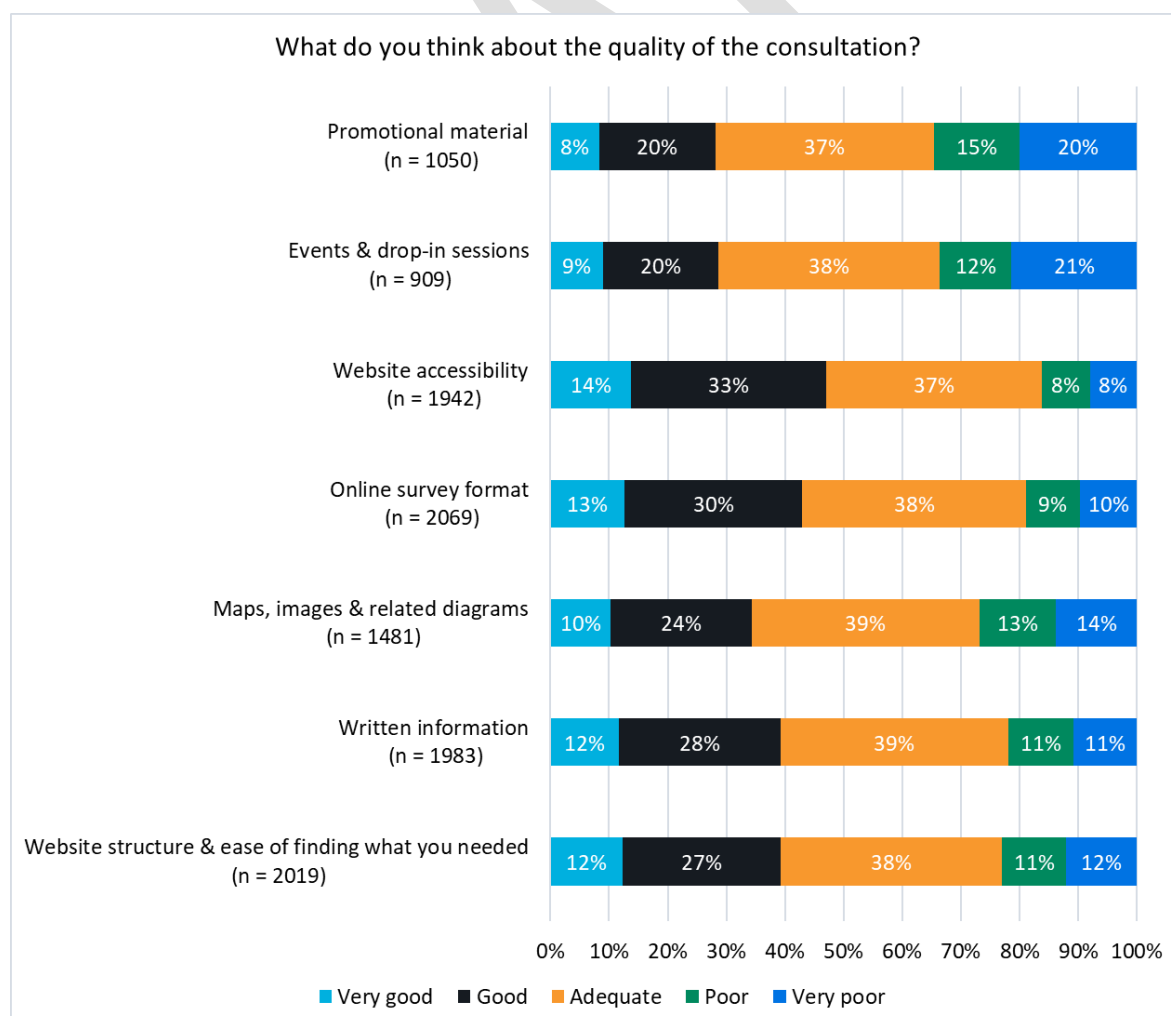
4. Comments on the consultation process

We asked respondents their thoughts on the quality of the consultation, rating the following consultation materials as either; 'very good', 'good', 'adequate', poor, or 'very poor':

- Promotional material
- Events and drop in sessions
- Website accessibility
- Online survey format
- Maps, images, and related diagrams
- Written information
- Website structure and ease of finding what was needed

Figure 4 below shows the results. Questions were optional, and respondents were able to rate more than one option. Therefore, the total number of responses to each option selected is greater than the number respondents. The number of respondents who provided their thoughts on each element is included in the figure below (n=).

Figure 4: Quality of the consultation



4.1 Summary of responses to question 9 (open question): Do you have any further comments about the consultation material?

Of the 2,573 responses to the consultation, 1,256 (86 per cent) provided their thoughts on this question.

There was a total of 816 individual responses from the public and 11 responses from stakeholders.

Every response to the open question was read in full. All comments have been summarised and analysed based on the frequency that the comment was expressed, guided by a code frame.

Tables 7 and 8 below present the most frequent comments from members of the public and from stakeholders.

Table 7: Most frequent comments from the public in response to open question 9

Do you have any further comments about the consultation material?

Theme	Comment	Number	%
Consultation	Stated no issue with consultation	174	21
Consultation	Concern that the questions included on the consultation are leading / not the questions that should be asked	120	15
Consultation	Concern about lack of consultation / undemocratic / illegal method for consultation (e.g. consultation will not be listened to)	68	8
Consultation	Concern about quality/lack of information provided (e.g. past/existing data collection) / suggestion for additional / clearer information	56	7
Consultation	Concern that the consultation / proposals have not been widely communicated / public unaware of proposal	51	6
Consultation	Concern that the consultation requires respondents to register	31	4
Consultation	Request rationale for proposal / publication of evidence to demonstrate that current fine is not sufficient	19	2
Consultation	Concern about consultation – non-specific	18	2
Consultation	Concern about technical issue with consultation	14	2

Theme	Comment	Number	%
Consultation	Suggest that there should be consultation with individuals / groups who drive as part of their employment	3	0

Table 8: Most frequent comments from stakeholders in response to open question 9

Do you have any further comments about the consultation material?

Theme	Comment	Number	%
Consultation	Stated no issue with consultation	6	55
Consultation	Concern about quality/lack of information provided (e.g. past/existing data collection) / suggestion for additional / clearer information	3	27
Consultation	Concern that the consultation / proposals have not been widely communicated / public unaware of proposal	1	9
Consultation	Concern that the questions included on the consultation are leading / not the questions that should be asked	1	9

5. Next steps

We have now reviewed all the comments received as part of this consultation and have replied to these in Appendix F: Response to issues raised.

The information contained in this report has been presented to the Mayor, who will use it to decide whether to increase the cost of a PCN for TLRN contraventions.

Should the Mayor decide to increase the level of the PCN, he must notify the Secretary of State for Transport.

The Secretary of State may object if he considers the cost to be excessive. If he does object, the increased cost may not be introduced until the Secretary of State withdraws his objection. The Secretary of State must exercise his reserve powers with 28 days of being notified.

Once the above process ends, should it be decided that the cost of the PCN will increase, we will issue public information to make everyone aware of the change, and the date the change would come into effect.

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Appendix A: Detailed analysis of comments

Question 2 in our consultation was an open question designed to allow additional comments on the proposals. We asked: Would the increase in the cost of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users?

Every response to the open question was read in full. All comments have been summarised and analysed based on the frequency that the comment was expressed, guided by a code frame.

The code frame grouped comments into six separate themes, as follows:

- Support
- Opposition - general
- Opposition - financial
- Opposition - deterrent
- Opposition – equality
- Suggestions

Many respondents made multiple comments, represented below as codes. Therefore, the total number of codes identified are greater than the number of responses received, and some responses referenced more than one codes.

Table 9: Public responses to question 2

Would the increase in the cost of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users?

Theme	Code	Number	%
Opposition - Financial	Concern that the proposed charge is too high / expensive / would cause financial stress	498	23
Opposition - Financial	Concern that the proposal to increase PCN charge is a money-making tool for TfL	426	20
Opposition - General	Concern that the proposal to increase the PCN charge is unfair on individuals (e.g. visitors) who accidentally contravene	317	15
Opposition - Deterrent	Concern that the proposal to increase PCN charge is unnecessary / existing charge is sufficient / already too high / should remain at existing charge	298	14
Support	Support proposal / no concern about proposal	255	12
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who use/need to use motor vehicles (general, not related to employment)	192	9

Theme	Code	Number	%
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages protected characteristic groups as it will negatively impact lower income groups	188	9
Support	No concern about proposal	182	9
Opposition - Financial	Concern about the cumulative impact of other charges / restrictions	180	8
Opposition - Financial	Concern about time of implementation during the pandemic / difficult times (e.g. added stress, financial stress)	173	8
Suggested Amendments	Suggest that signage should be improved to ensure users do not contravene due to lack of / unclear signage / suggestion to offer education to avoid confusion	134	6
Support	Support proposal to increase PCN charge, but proposal is too low to act as sufficient Deterrent	107	5
Opposition - Equality	Concern that the proposal to increase PCN disadvantages protected characteristic groups (e.g. as they require access to some restricted routes due to poor mobility)	91	4
Opposition - General	Oppose proposal but no reasoning provided	89	4
Suggested Amendments	Suggest that the PCN charge should be tiered by emissions / income / frequency / severity of contravening / type of vehicle / speed of payment / other	83	4
Opposition - Financial	Concern that the proposal to increase PCN charge is not value for money / waste of TfL's money / time	77	4
Support	Support proposal	73	3
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor vehicles for employment - taxis / private hire service / professional drivers	68	3
Opposition - Deterrent	Oppose proposal to increase PCN charge and concern that the proposal to increase will not be sufficient to act as a deterrent (e.g. for higher income groups)	66	3
Suggested Amendments	Suggest a focus on enforcement / impose other restrictions (e.g. on cyclists, e-scooters as well as cars)	65	3

Theme	Code	Number	%
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor vehicles for employment - delivery / freight	60	3
Suggested Amendments	Suggest that there should be some exceptions for businesses / residents that require access to restricted routes (e.g. reduced operating hours, exceptions for deliveries / vulnerable)	48	2
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor vehicles for employment - non-specific / general business / tradespeople	40	2
Other	Comment out of scope of PCN proposals	28	1
Other	Specific request for information (e.g. TfL profit from fines)	19	1
Other	Comment unclear	17	1
Opposition - General	Concern about the negative impact on driving conditions for drivers (e.g. congestion, stress)	10	0
Suggested Amendments	Suggest that a warning letter is issued the first time any individual contravenes	8	0
Support	Support proposal to increase PCN charge, but worried about other forms of illegal parking / where people will park / load	3	0
Suggested Amendments	Suggest that the PCN charge should increase but at a lower rate (e.g. with inflation)	2	0
Other	Duplicate Response	1	0

Table 10: Stakeholder responses to question 2

Would the increase in the cost of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users?

Theme	Code	Number	%
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor vehicles for employment - delivery / freight	6	21
Support	Support proposal	5	19
Opposition - Deterrent	Concern that the proposal to increase PCN charge is unnecessary / existing charge is sufficient / already too high / should remain at existing charge	5	19

Theme	Code	Number	%
Opposition - Financial	Concern about time of implementation during the pandemic / difficult times (e.g. added stress, financial stress)	5	19
Opposition - Financial	Concern about the cumulative impact of other charges / restrictions	4	14
Support	No concern about proposal	3	11
Opposition - Financial	Concern that the proposed charge is too high / expensive / would cause financial stress	3	11
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages protected characteristic groups as it will negatively impact lower income groups	2	7
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor vehicles for employment - non-specific / general business / tradespeople	2	7
Opposition - Financial	Concern that the proposal to increase PCN charge is not value for money / waste of TfL's money / time	2	7
Opposition - Financial	Concern that the proposal to increase PCN charge is a money-making tool for TfL	2	7
Opposition - General	Concern that the proposal to increase the PCN charge is unfair on individuals (e.g. visitors) who accidentally contravene	2	7
Other	Specific request for information (e.g. TfL profit from fines)	2	7
Suggested Amendments	Suggest that there should be some exceptions for businesses / residents that require access to restricted routes (e.g. reduced operating hours, exceptions for deliveries / vulnerable)	2	7
Suggested Amendments	Suggest a focus on enforcement / impose other restrictions (e.g. on cyclists, e-scooters as well as cars)	2	7
Opposition - Deterrent	Oppose proposal to increase PCN charge and concern that the proposal to increase will not be sufficient to act as a deterrent (e.g. for higher income groups)	1	4
Opposition - Equality	Concern that the proposal to increase PCN charge disadvantages protected characteristic groups (e.g. as they require access to some restricted routes due to poor mobility)	1	4
Opposition - Equality	Concern that the proposal to increase the PCN charge disadvantages those who need to use motor	1	4

Theme	Code	Number	%
	vehicles for employment - taxis / private hire service / professional drivers		
Opposition - General	Concern about the negative impact on driving conditions for drivers (e.g. congestion, stress)	1	4
Suggested Amendments	Suggest that signage should be improved to ensure users do not contravene / concern that users accidentally contravene due to lack of / unclear signage / suggestion to offer education to avoid confusion	1	4
Suggested Amendments	Suggest that a warning letter is issued the first time any individual contravenes	1	4
Support	Support proposal to increase PCN charge, but proposal is too low to act as sufficient Deterrent	1	4
Support	Support proposal to increase PCN charge, but worried about other forms of illegal parking / where people will park / load	1	4

Question 9 in the consultation was an open question designed to receive feedback on the consultation process and materials used. We asked: Do you have any further comments about the quality of the consultation materials?

Every response to the open question was read in full. All comments have been summarised and analysed based on the frequency that the comment was expressed, guided by a code frame.

The code frame grouped comments into a single theme, as follows:

- Consultation

Some respondents made multiple comments, represented below as codes. Therefore, the total number of codes identified are greater than the number of responses received, and some responses referenced more than one codes.

Table 11: Public responses to question 9

Do you have any further comments about the quality of the consultation materials?

Theme	Code	Number	%
Consultation	No issue with consultation	174	21
Consultation	Concern that the questions included on the consultation are leading / biased / not the questions that should be asked	120	15
Consultation	Concern about lack of consultation / undemocratic / illegal method for consultation (e.g. consultation will not be listened to)	68	8

Theme	Code	Number	%
Consultation	Concern about quality/lack of information provided (e.g. past/existing data collection) / suggestion for additional / clearer information	56	7
Consultation	Concern that the consultation / proposals have not been widely communicated / public unaware of proposal	51	6
Consultation	Concern that the consultation requires respondents to register	31	4
Consultation	Request rationale for proposal / publication of evidence to demonstrate that current fine is not sufficient	19	2
Consultation	Concern about consultation – non-specific	18	2
Consultation	Technical issue with consultation	14	2
Consultation	Suggest that there should be consultation with individuals / groups who drive as part of their employment	3	0

Table 12: Stakeholder responses to question 9

Do you have any further comments about the quality of the consultation materials?

Theme	Code	Number	%
Consultation	No issue with consultation	6	55
Consultation	Concern about quality/lack of information provided (e.g. past/existing data collection) / suggestion for additional / clearer information	3	27
Consultation	Concern that the consultation / proposals have not been widely communicated / public unaware of proposal	1	9
Consultation	Concern that the questions included on the consultation are leading / biased / not the questions that should be asked	1	9

Appendix B: Consultation questions

1. Do you think the proposed PCN cost of £160 is?

[Sufficient to act as an effective deterrent / Not high enough to act as an effective deterrent / Too high to act as an effective deterrent / Do not know / No opinion]

2. Would the increase in the cost of a PCN cause you any particular difficulties or hardship, or unfairly penalise any particular group of road users? If so, please share your thoughts below.
[free text answer]

About you

3. Are you? (Please tick all boxes that apply)

[A local resident / A local business owner / Employed locally / A visitor to the area / A commuter to the area / A taxi/private hire vehicle driver / Not local but interested in the scheme / Other (please specify)]

4. Can you please confirm if you are responding as an individual or as an official representative of an organisation (e.g., interest group, charity, or trade body)?

As an individual	As an official representative of an organisation
------------------	--

5. If you are responding as an official representative of an organisation, then please provide your organisation name below.

[free text answer]

6. How did you hear about this consultation (the main way you heard?)

[Received an email from TfL / Read about it in the press / Saw it on the TfL website / social media / Other (please specify)]

7. What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)

	Very good	Good	Adequate	Poor	Very poor	Not applicable
Website structure & ease of finding what you needed						
Written information						
Maps, images						

	Very good	Good	Adequate	Poor	Very poor	Not applicable
<i>&related diagrams</i>						
<i>Online survey format</i>						
<i>Website accessibility</i>						
<i>Events & drop in sessions</i>						
<i>Promotional material</i>						

8. Do you have any further comments about the quality of the consultation materials?

[Free text answer]

DRAFT

Appendix C: Consultation materials

Consultation web page snapshots

The screenshot shows the Transport for London website with a navigation bar at the top. The main header features a large image of a 'RED ROUTE CLEARWAY' sign. Below the image, the page title is 'Increasing the fine level for drivers who fail to follow the rules on TfL managed roads'. The content area includes a 'Consultation has concluded' section with a summary of the consultation period (5 August to 19 September 2021) and the number of responses (over 2,000). There are buttons for 'Survey' and 'Questions'. On the right side, there is a 'Type of conversation' section indicating 'Consultation' and 'Key Dates' showing 'Consultation opens 05 August 2021'.

The screenshot shows the 'Overview' section of the consultation page. It contains several paragraphs of text explaining the purpose of the consultation, the fine levels, and the availability of materials. Below the text is a 'Lifecycle' diagram with three stages: 'Open', 'Under Review', and 'Final report'. The 'Open' stage is currently active, indicating that the consultation is open for contributions. The 'Under Review' stage is also visible, indicating that contributions are being evaluated. The 'Final report' stage is the final outcome of the consultation.

- Vehicles parking illegally in loading bays
- Vehicles blocking yellow box junctions or making a turn where this movement is banned
- Vehicles driving or parking in a bus lane
- Vehicles parking illegally on double red lines, or on single red lines at times when parking is not permitted
- Vehicles parking in red route parking bays longer than permitted

Increasing the cost of the PCN

The cost of a PCN for contraventions on the red route network has not increased for over 10 years. In April 2011 it rose from £120 to £130. It currently stands at £130.

Our proposed PCN increase to £160, for contraventions on the red route network, is in line with inflation since the last PCN increase in 2011.

According to the [Bank of England inflation calculator](#), inflation has averaged at 2.5% a year since 2011.

An effective deterrent

We believe it is important that the level of a PCN, for contraventions on the red route network, must remain an effective deterrent. A higher PCN level is anticipated to be a more effective deterrent that will, over time, lead to a reduced level of contraventions.

Good levels of compliance would improve safety for all road users, reduce congestion and reduce journey times as more obstructions to free-flowing traffic would be reduced.

This would help deliver benefits such as road safety, bus reliability, reduced congestion, improved air quality and the encouragement of active travel as walking and cycling becomes more enjoyable in a pleasant environment. This is in line with the long-term objectives within the Mayor's Transport Strategy.

For further reading, including details of our previous public consultation related to PCNs held in 2017, please see the [Background](#) page in 'Documents'.

Equalities Impact Assessment

We have undertaken an [Equality Impact Assessment \(EqIA\)](#). The EqIA examines what impact (positive or negative) the proposed PCN increase for contraventions on the red route may have on customers with characteristics protected by the Equality Act 2010.

The EqIA can be found in the 'Documents' section.

Documents

[Penalty Charge consultation easy read text](#) (3.74 MB) (pdf)

[Penalty Charge consultation easy read survey](#) (4.51 MB) (pdf)

[Penalty Charge consultation flyer](#) (355 KB) (pdf)

[More...](#)

FAQs

[Why is it necessary to target motorists to increase revenue?](#)

[How can I find out more about the rules of the red route network?](#)

[Will I still be able to make an early repayment at a reduced rate for my PCN?](#)

What's next?

This proposal is subject to the outcome of our consultation. Once consultation ends on 19 September 2021, we will spend time considering all the responses we receive and will prepare a consultation report.

The consultation report will be presented to the Mayor of London, who will then decide whether to increase the level of the PCN for contraventions of the rules of the red route network.

Should the Mayor decide to increase the level of the PCN, he must notify the Secretary of State for Transport.

The Secretary of State may object if it is considered the level of the financial penalty would be excessive. If he does so, the increased level may not be introduced until the Secretary of State withdraws the objection.

The Secretary of State must exercise his reserve powers within 28 days of being notified.

Once the above process ends, should it be decided that the cost of the penalty charge will increase, we will communicate this.

A copy of the consultation report will be available to everyone that takes part in the consultation and a copy will be published on our website.

Have your say

We are running a public consultation about this proposal. The consultation is open from Thursday 5 August 2021 to Sunday 19 September 2021.

Please share your views by taking part in our [online survey](#). It should take you no more than 10 minutes to complete.

To take part you will need to register with your email address. Your details will be kept secure and only used, with your permission, to update you about the outcome of the consultation and our next steps.

If you prefer not to complete the survey, then please submit your response to us in writing (no stamp needed) to:

- Haveyoursay@tfl.gov.uk; or
- FREEPOST TFL HAVE YOUR SAY

[More...](#)

Videos



Who's Listening

Michelle Wildish

Local Communities and Partnerships



How the Red Route fine would increase



MAYOR OF LONDON

Have your say on proposals to increase fines on TfL managed roads

To help keep London moving safely we are proposing to increase the penalty charge fine for people who fail to follow the rules of the red route network (ie those roads we manage in London) from £130 to £160. This would be reduced to £80 if paid within 14 days.

Fines can be issued for, but are not limited to:

- Vehicles parking illegally in loading bays
- Vehicles blocking yellow box junctions
- Vehicles driving or parking in a bus lane
- Vehicles parking illegally on double or single red lines
- Vehicles parking in red route parking bays longer than permitted

When people don't follow the rules of the red route it affects the safety of other road users and causes disruption and delays on the road network.

To find out more and share your views, visit haveyoursay.tfl.gov.uk/penalty-charge-2021

Consultation ends
19 September 2021

Have
your
say



MAYOR OF LONDON

1 of 1



TRANSPORT
FOR LONDON
EVERY JOURNEY MATTERS

**Have your say
on proposals to
increase fines on
TfL managed roads**

**Have
your
say**




**Have your say on proposals to
increase fines on TfL managed roads**




Customer email

We would like your opinion on proposed changes to the TfL penalty charge Can't see this email? [View online](#)

[Home](#) [Plan a journey](#) [Status updates](#)



Transport for London 

Dear Si,

We are proposing to increase the fine level (TfL penalty charge) for drivers who fail to follow the rules of the red route network, committing parking, loading or moving traffic offences. The red route is the road network managed by TfL in London.

The penalty for red route offences has stood at £130 since 2011. We are now proposing to increase the penalty to £160. This would be reduced by half to £80 if paid within 14 days.




Income we receive from fines is used to cover the cost of enforcement, and any surplus is reinvested in making roads safer.


For more information on our proposals and to share your views, please [visit our consultation page](#).

Consultation closes Sunday 19 September 2021.

Yours sincerely,

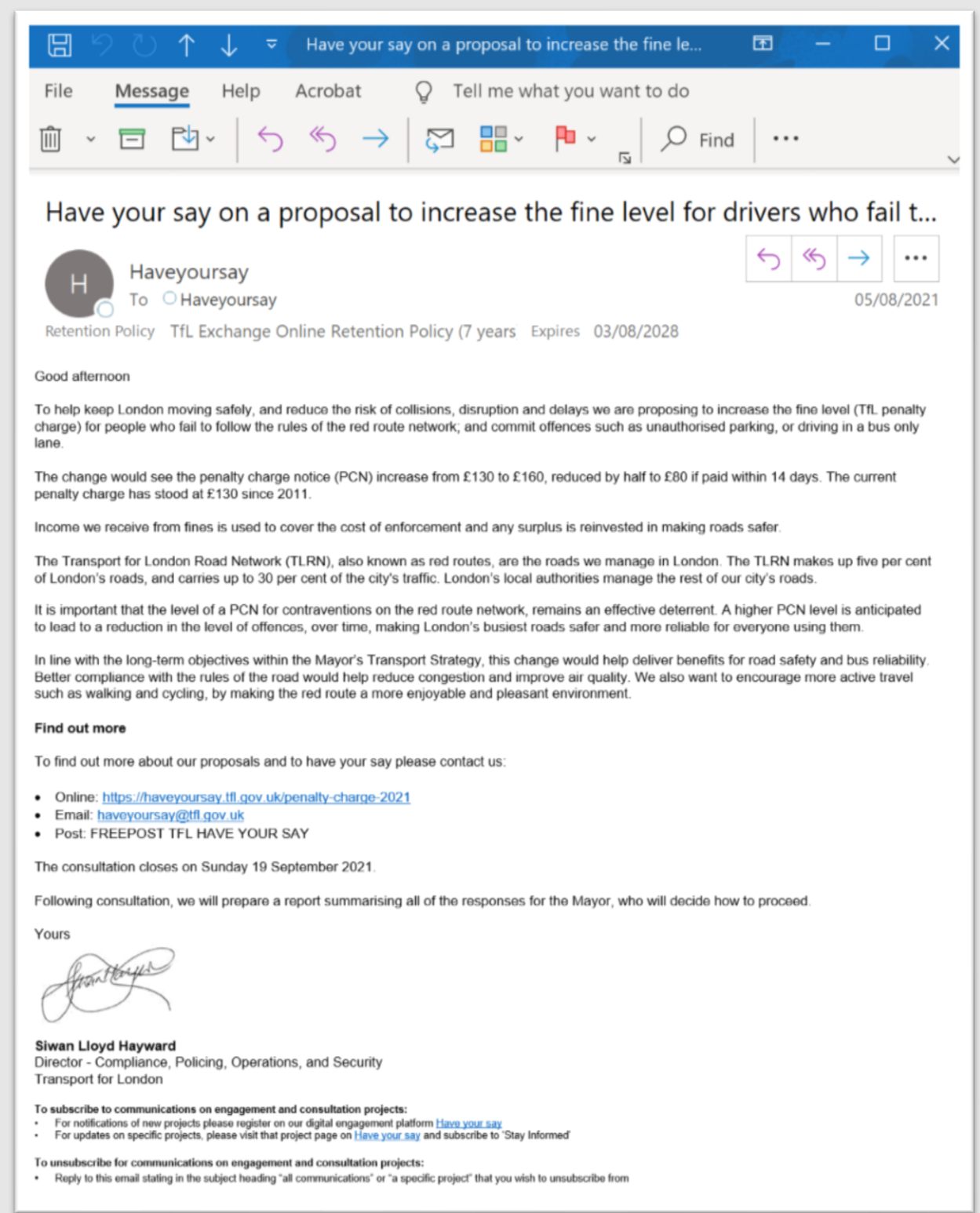
Siwan Lloyd Hayward
Director - Compliance, Policing, Operations and Security

MAYOR OF LONDON 

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Stakeholder email



Have your say on a proposal to increase the fine le...

File Message Help Acrobat Tell me what you want to do

Have your say on a proposal to increase the fine level for drivers who fail t...

 Haveyoursay
To Haveyoursay
05/08/2021

Retention Policy TfL Exchange Online Retention Policy (7 years) Expires 03/08/2028

Good afternoon

To help keep London moving safely, and reduce the risk of collisions, disruption and delays we are proposing to increase the fine level (TfL penalty charge) for people who fail to follow the rules of the red route network; and commit offences such as unauthorised parking, or driving in a bus only lane.

The change would see the penalty charge notice (PCN) increase from £130 to £160, reduced by half to £80 if paid within 14 days. The current penalty charge has stood at £130 since 2011.

Income we receive from fines is used to cover the cost of enforcement and any surplus is reinvested in making roads safer.

The Transport for London Road Network (TLRN), also known as red routes, are the roads we manage in London. The TLRN makes up five per cent of London's roads, and carries up to 30 per cent of the city's traffic. London's local authorities manage the rest of our city's roads.

It is important that the level of a PCN for contraventions on the red route network, remains an effective deterrent. A higher PCN level is anticipated to lead to a reduction in the level of offences, over time, making London's busiest roads safer and more reliable for everyone using them.

In line with the long-term objectives within the Mayor's Transport Strategy, this change would help deliver benefits for road safety and bus reliability. Better compliance with the rules of the road would help reduce congestion and improve air quality. We also want to encourage more active travel such as walking and cycling, by making the red route a more enjoyable and pleasant environment.

Find out more


To find out more about our proposals and to have your say please contact us:

- Online: <https://haveyoursay.tfl.gov.uk/penalty-charge-2021>
- Email: haveyoursay@tfl.gov.uk
- Post: FREEPOST TFL HAVE YOUR SAY

The consultation closes on Sunday 19 September 2021.

Following consultation, we will prepare a report summarising all of the responses for the Mayor, who will decide how to proceed.

Yours



Siwan Lloyd Hayward
Director - Compliance, Policing, Operations, and Security
Transport for London

To subscribe to communications on engagement and consultation projects:

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- For updates on specific projects, please visit that project page on [Have your say](#) and subscribe to 'Stay Informed'

To unsubscribe for communications on engagement and consultation projects:

- Reply to this email stating in the subject heading "all communications" or "a specific project" that you wish to unsubscribe from

Press release and examples of press coverage

Press release



Thursday 5 Aug 2021

TfL Press Release - TfL asks people to have their say on proposals to cut road danger and congestion by increasing fines on London's red routes



[Download](#)

PN-086

Press release 1/4

- **Proposals would increase compliance and cut road danger and congestion, by raising the maximum penalty charge notice for motorists who fail to follow red route rules from £130 to £160**
- **The proposed increase in the charge is intended to be a more effective deterrent that will lead to a reduced level of contraventions**
- **Ignoring rules on some of London's busiest roads (known as red routes) increases the risk of collisions, creates danger for people walking and cycling and makes congestion worse**
- **The fine has stood at £130 since 2011 and this would be the first increase in 10 years**
- **Consultation is open until 19 September**

Transport for London (TfL) is asking people to have their say on proposals that aim to boost safety and cut congestion on London's network of red routes, by increasing the maximum penalty charge notice (PCN) for contraventions of the rules from £130 to £160. Fines would be reduced to £80 if paid within 14 days. All income from PCNs is re-invested by TfL, to cover the cost of enforcement and schemes to reduce road danger.

London's red routes are roads managed by TfL. They make up five per cent of roads but carry 30 per cent of the traffic. Red routes exist to allow traffic to move safely and efficiently along some of the busiest roads in London. Stopping is generally prohibited on these roads, outside of designated locations and times clearly marked by signs. Failing to follow the rules and signs at junctions creates safety risks, disrupts traffic and creates congestion for everyone. Vital deliveries and collections can be obstructed and buses and the emergency services can be delayed.

Fine levels are set to deter motorists from ignoring vital rules and safety restrictions. They are an important way of encouraging everybody to follow the rules of the road. PCNs can be issued for:

- Parking illegally in loading bays
- Blocking yellow box junctions
- Making a turn where this movement is banned, which creates risk for people walking and cycling

Press release 2/4

- Driving or parking in a bus lane
- Parking illegally on double red lines, or on single red lines at times when parking is not permitted

The cost of a PCN for contraventions on the red route network has not increased for over ten years. The last increase was in April 2011 when it rose from £120 to £130. TfL's proposed increase to £160 is in line with inflation since the last increase. TfL expects the higher fine level to be a more effective deterrent that will, over time, lead to a reduced level of contraventions and help to keep the road network safe for everyone. Increased compliance with the rules is also expected to boost bus reliability, reduce congestion, improve air quality and the encourage more people to walk and cycle.

TfL's consultation is now open at haveyoursay.tfl.gov.uk/penalty-charge-2021 and runs until 19 September.

Siwan Hayward, TfL's Director of Compliance and Policing, said: "London's network of red routes plays a vital role in keeping people moving across the capital and it's really important that everybody follows the rules that are in place to keep roads clear and to keep people safe. We'd much rather people follow the rules than fine them, and the proposed increase in fines is intended to increase compliance with the rules and make streets safer, cleaner and less congested for everyone. I'd urge people to have their say on these proposals and we welcome all feedback on our plans."

Reducing danger on the capital's transport network is a top priority for TfL. TfL continues to work on a number of major programmes to make London's roads and the vehicles using them safer. TfL's Safer Junctions programme is making life-saving changes at some of the capital's most dangerous and intimidating junctions. To date, TfL has completed work at a total of 42 junctions, with construction expected to start on more schemes later this year.

Press release 3/4

TfL's world-first Direct Vision Standard, which reduces lethal blind spots on lorries, is already helping to save lives and prevent life-changing injuries. The scheme requires owners of Heavy Good Vehicles (HGVs) weighing more than 12 tonnes to apply for a free permit that assigns vehicles a star rating based on how much the driver can see directly through their cab windows in order to be able to drive in London. Since its introduction, more than 70,000 HGVs have had safe systems fitted, improving protection for people walking, cycling or riding e-scooters or motorcycles and saving lives.

Speed limits have also been reduced to 20mph on a number of TfL roads across the capital and TfL is currently consulting on reducing the speed limit on 13km of roads within Westminster.

Contact Information

TfL Press Office

Transport for London

0343 222 4141

pressoffice@tfl.gov.uk

Downloads



TfL Image - a box junction on Euston Road

[Download](#)

Press release 4/4




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Consultation launched as TfL proposes increased fines on London's red routes

POSTED ON AUGUST 6, 2021

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[August 2021](#)


Have your say on TfL proposal to increase fines for rule-breaking drivers

9 August 2021


To help keep London moving safely and reduce disruption and delays TfL are proposing to increase the fine level (TfL penalty charge) from £130 to £160 for people who fail to follow the rules of the red route network - the roads they manage in London. The fine level would be reduced by half to £80 if paid within 14 days.

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TfL Plan to Increase Fines on Red Lines




Image by Subhaan Saleem.

News Team
Fri, Aug 06, 2021

Appendix D: Summary of Stakeholder replies

This section provides summaries of the feedback we received from stakeholders. We sometimes have to condense detailed responses into brief summaries. The full stakeholder responses are always used for analysis purposes.

Local authorities & statutory bodies

The London Borough of Enfield – Healthy Streets programme

Supports the proposed increase in penalty notice charge.

Emergency services

Metropolitan Police

No objection to the proposal.

Accessibility Groups

Camden Disability Action

Agreed with the proposal stating that those contravening the rules cannot be fined too heavily.

Elders Voice

Answered ‘**Not high enough** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Hackney Disability Backup

Answered ‘**Not high enough** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Transport and road user groups

Camden Cycling Campaign

Answered ‘**Not high enough** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Campaign for Better Transport

Said it broadly supported the proposals.

Logistics UK

Strongly opposed the proposal noting there did not appear to be any underlying data to show that an increase to the PCN level would lead to an improvement in compliance. Said the proposal would add to the cost of servicing the capital and push up prices for London's businesses, residents, and visitors at a time when the economy is recovering from the Covid-19 pandemic.

Noted how the pandemic had demonstrated how logistics is essential to the everyday functioning of London and the essential nature of deliveries should be fully recognised in city planning; and that the Mayor's Transport Strategy had identified 'efficient freight' as a principle of good growth.

The importance of parking enforcement was acknowledged in ensuring road users followed the rules, and highway authorities could undertake their statutory duty of managing traffic flow. However, there was concern the logistics industry received millions of pounds a year in PCN costs because there was nowhere to legally stop and deliver. It considered this was due to unsuitable loading bay and red lines hours of operation, adding that the hours of operation did not meet the needs of businesses or residents receiving deliveries.

While it understood the challenge that TfL and the boroughs had with managing competing demands at the kerbside, a lack of places to legally deliver pushed up the costs of goods and services in London. Sensible management of this could reduce business costs as well as reducing mileage from driving around and waiting to find a suitable loading/unloading space.

Concern was raised about a lack of supporting data for the proposals. There was not data related to the impact of the PCN level being static for ten years, or evidence that a higher PCN level would reduce contraventions. In addition, there was no data detailing who PCNs were issued to; noting that if these were repeat offenders, could there have been a route towards better compliance such as changes to time plates to ensure essential delivery/service activity were not being penalised.

Logistics UK considers this is the wrong time to increase costs of business while the UK starts to recover from the pandemic, and that now is not the time to add a further cost without a legitimate policy goal.

London Taxi Drivers Association (LTDA)

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Said the proposal could negatively impact professional drivers, specifically licensed taxi drivers, who receive a PCN, by placing a greater financial burden on them.

Added that London's licensed taxi drivers prided themselves on their professionalism and the provision of a safe, reliable service, however errors could and did happen which could result in them being issued with PCNs.

London TravelWatch

Stated it would expect all motorists who choose to appeal were treated in an unbiased and fair way. It also expected all appeals were responded to promptly and costs should not increase whilst an appeal process was ongoing. Appellants should be advised of the time in which to make payment if an appeal is refused and should also be allowed to pay at the lower rate.

Commenting on the consultation process it said the words 'survey' and 'consultation' should not be interchangeable. The website asks to 'take a survey' but other areas refer to a consultation. Said it would also be helpful to be able to view the questions before entering the survey portal.

RAC

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated the proposal would disproportionately impact upon lower-income groups and smaller businesses. Said the existing £130 PCN level was more than enough as a sufficient deterrent.

Noted the proposal came only days after the Mayor of London announced an increase in the Congestion Charge rate.

Said it did not believe there was any justification for raising the PCN level to £160.

Road Haulage Association

Reported its members frequently comment that London is a hostile environment for road freight to work in and that penalty charges are an administrative burden on road freight deliveries and collections in London.

Totally opposed any increase to fines, stating this is extremely unfair, especially when London is recovering from the consequences of the pandemic.

Said that if fines are increased the increased cost to road freight would be passed onto London customers. Noted road freight operators operate on about a one per cent profit margin and cannot absorb additional costs.

They expect that operators who require their drivers to pay fines will see those drivers stop working in London, which would add to existing delivery and collection times, and to economic inflation. Said that as road freight is essential for all London businesses to function, and London requires resupplying with 400,000 tonnes of

road freight daily to operate, this would adversely impact supply chains and the ability to resupply.

Added that road space reallocation measures, implemented without consultation, affected the ability for road freight to operate at the same performance level as prior to the pandemic. This was due to delivery and collection issues, which had increased journey times and congestion, not reduced it. Said that by virtue of these retrograde measures heavy good vehicle (HGV) drivers were seeing their effective working days and their number of deliveries and collections reduced.

Noted a shortage HGV drivers and heavy goods vehicles to maintain existing operations. This had affected the restocking of shops is less effective, with fewer goods. If extra vehicles are required, to deal with the shortfall, then more congestion will be created, causing greater problems for the supply chain.

Added that TfL consulted on the same issue in 2017 and increases were not implemented. Considered that until the economy returned to normal following the pandemic no additional sanctions should be considered and that businesses need support from TfL, not additional sanctions.

Railfuture Limited

Answered '**Not high enough** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Southwark Cyclists

Answered '**Not high enough** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Said that people who cycle would be impacted by the PCN level being too low, as well as by what it perceived as a total lack of enforcement. Stated when this was combined with no sensible way for the public to report parking on double red lines, there was no deterrent and the cost of a fine because irrelevant.

Reported people park with no worry or concern due to a known lack of enforcement, as the use of CCTV (Closed Circuit Television) alone could not prevent obscured number plates. A particular pattern was noted in Southwark, where it was stated illegal parking and stopping was a daily issue on Cycleways C10 and C14.

The Automobile Association

The Automobile Association (The AA) believes that current fines levels are sufficient to provide deterrence.

The AA said it fully accepted the need for fair and effective road traffic enforcement to deter driving that impeded other road users, reduced the effectiveness of the road network, disrupted businesses, and could lead to increased emissions. However,

that enforcement needed to be fair, proportionate and allow discretion while creating a deterrent.

Three areas of particular concern about the proposal were raised; did the punishment fit the offence, what was the level of offending that justified a PCN increase, and how fair was enforcement along the TLRN.

The AA had noted adjudicators' reports from successful appeals against Transport for London fines had called into question the level of discretion used in deciding whether an offence has been committed. It said given the size of the current fine and now a nearly 25 per cent increase, the offence needed to justify that level of punishment.

The AA referenced the top level of minimum wage as £8.91 an hour for over-18s, and hourly rates for those under-18 and those in the first year of an apprenticeship and considered that a loss of a day's wages for a driving mistake, potentially due to poor signage did not match the offence. In comparison, the fine for a penalty notice for disorder (i.e. shoplifting, criminal damage) was £90. The AA therefore asked, did society consider stopping in a yellow box junction or wandering into a bus lane to be a worse offence than stealing or criminal damage?

The AA noted that consultation materials did not provide statistics to justify the proposed increase. It also cited TfL research from 2017 that showed more than 60 per cent of PCNs were for first-time offences and argued that the current level of fine is having a significant deterrent effect.

It also noted that a list of successful appeals showed individual businesses being issued with multiple PCNs for the same offence on separate occasions. These had been cancelled on appeal, very often with the authority not contesting. This led the AA to describe TfL enforcement as grossly unfair and sometimes shoddy.

The AA acknowledged there was a robust appeals process available for drivers issued with PCNs, to London's credit. However, it was dependent on drivers recalling enough of the circumstances and having the time to make an appeal. There was a concern that for every successful appeal there is a host of similar instances at the same spot that didn't go to an adjudicator and gave some examples of adjudicator's reports that it considered showed some flaws in the enforcement process, examples where discretion would have been exercised, and hot-spot areas where the offence could be related to poor signage.

To conclude the AA's response, it said TfL needed to review and improve fairness in the way it enforced restrictions along its road network before an increase in the fine level could be accepted, yet there was little pressure to quality control how enforcement was carried out.

The AA said it had argued previously in its 'Caught in a Trap' campaign that fines per location needed to be monitored. This would show where restrictions and the related road layouts were ineffective, and where signage, markings and design may need to be improved.

It added the job of enforcement was to maintain road flow, not create easy money through unjustified fines - made more lucrative by increases that were out of kilter with financial penalties for far worse offences.

United Cabbies Group

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Business groups

Camden Town Unlimited

Answered '**Sufficient** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated that the size of the penalty was not as much of a deterrent and the likelihood of getting caught. Suggested that investing in enforcement would have a bigger impact than the level of the fine.

Federation of Small Businesses

Noted the proposed increase came at a time when small businesses who relied on their vehicles were already having to contend with the increase in Congestion Charge and the ULEZ (Ultra Low Emission Zone) extension in October 2021.

Acknowledged there had been no PCN increase in 10 years.

Stated that for a number of its members who were small and medium sized enterprises, striving to survive following the easing of Covid restrictions, the cost of doing business in London remained high and the increase combined with the Congestion Charge and ULEZ extension placed further stress on their ability to recover.

Stated they would like to see the ability to pay reduced fine of to £80 if paid within 14 days, be extended to at least 30 days/one calendar month. This would ensure small businesses had more of a chance of accommodating any fines within their business cashflow.

Added that small businesses are the 'heartbeat of London' and they were an essential component to the economic recovery of the capital. They need to feel

listened to and supported; not to have their fragile stability rocked by more increases in transport related costs.

Royal Mail Group

Answered ‘**Sufficient** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated Royal Mail exemptions need to continue to be followed and recognised. This had reduced the unnecessary workload when processing fines which are appealed and accepted due to exemptions.

Businesses, employers, and venues

Fox Transport

Answered ‘**Sufficient** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

John Lewis Partnership

The John Lewis Partnership does not agree with the proposal. It is concerned the proposed increase would have a severe negative effect on the Partnership’s efforts to help the economic recovery following the pandemic.

The Partnership explained that it operates a number of retail outlets and distribution hubs and extensive retail and home delivery operations in and around Greater and Central London, with deliveries taking place throughout the week. Where possible it aims to avoid peak times by using out of hours delivery windows.

It stated that its logistics operation has encountered unprecedented demand, servicing both shops via distribution operations, and e-commerce customers via its home delivery operations. This had played a vital role in supporting the capital, providing essential goods through the Covid-19 crisis.

The Partnership recognised the role parking enforcement plays in ensuring road users abide by the rules and that highway authorities can undertake their statutory duty of managing traffic flow. While it supported these goals, it said its fleet attracted a number of PCNs, in many cases when drivers had no other options to stop and deliver legally, as the hours of loading bays and red lines were incompatible with the needs shop opening times, or work with online customers receiving deliveries, often with heavy goods.

While noting the cost of a PCN had remained unchanged for ten years, the Partnership said it was very concerned there was no data provided within the consultation documents to prove whether this has had an impact on the number of contraventions or repeat offenders, or to support the comment that: “A higher PCN

level is anticipated to be a more effective deterrent that will, over time, lead to a reduced level of contraventions.”

The Partnership noted it has and will continue its investment in a new, safer, more emission friendly fleet, but did not think the proposal to increase PCN charges acted as an incentive for cleaner quieter, safer deliveries into the Capital.

Martin Brower UK

Answered ‘**Too high** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Concerned the proposal would negatively impact the freight industry.

MET Parking Services Limited

Answered ‘**Sufficient** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Said that penalties were most effective when they acted as a deterrent and if the level was too low they became an acceptable cost of travel and did not deter abuse.

Added that in this instance, once the Capital returns to pre-pandemic levels of transport use, and with the additional cycle infrastructure that has been put in place it is necessary to keep the roads moving freely and avoid blocking public transport routes, so there should be a high deterrent penalty put in place.

O'Donovan WD Limited

Answered ‘**Too high** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated that the proposal would penalise HGVs (Heavy Good Vehicles) who it said were already restricted from much of London’s road network and did not have the option of being able to pull out of the way when stopped at a site.

Described the proposal as a cost exercise.

Post Office Limited

Two stakeholders responded on behalf of the Post Office.

Each answered ‘**Too high** to act as an effective deterrent’ in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated that the Post Office already received several PCN's on red routes due to the nature of its work providing a service to the public collecting and delivering high amounts of cash.

Explained how it must park outside post offices due to security procedures, and spends several thousands a year to provide its service at a loss due to PCNs it receives.

Said that fundamentally the proposal would result in the Post Office Supply Chain reducing services in and around London which would have a detrimental effect on older people etc using local Post Offices.

The Post Office said it would like to receive an exemption to stop on red routes to service its branches, as was the case for Royal Mail.

Sainsbury's

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated that the driving of large goods vehicles in London to service its customers had become increasingly difficult due traffic at junctions and the lack of understanding of other road users, resulting in an increase in box junction PCN's at the financial expense of the driver.

Town and Country Meats

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated that across the board TfL charges were collectively and excessive when compared with other cities in the UK, and this was adding financial pressure to business looking to develop in south east England.

Said it understood there was an argument for some penalty charging but collectively all the charges went too far.

Suggested the wrong groups were being targetted. Questioned what charges are were for cyclists and scooters in London, stated these operated freely without insurance were often considered to be the cause of collisions due to wreckless riding.

Local interest groups

Belgravia Residents Association

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Said the proposal would harm many people. Stated that the charge was already a deterrent and increasing it would only serve to bring in more revenue for TfL.

Better Streets for Havering

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Stated that it supported strong deterrents in when enforcing rules of the red route network.

STAMP (Shad Thames Area Management Partnership)

Answered '**Not high enough** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Others

Saturday Walkers Club

Answered '**Too high** to act as an effective deterrent' in response to question 1 - Do you think the proposed PCN cost of £160 is an effective deterrent?

Said the cost of a PCN was already too high and there should not be a financial penalty that discriminated against those on lower incomes. Added the sum of £160 was not significant to those on higher incomes.

Suggested there should be a time penalty for contraventions (such as a compulsory education course) rather than a financial one. Also suggested the first contravention should result in a warning only. Then educate, warn, penalise. The first infringement per year should be a warning only (as was the case for the QE Bridge Toll).

Appendix E: List of stakeholders consulted with

Local authorities & statutory bodies

All London borough local authorities
City of London Corporation
Port of London Authority
The Royal Parks

Government departments, parliamentary bodies & politicians

All London Members of Parliament
All Greater London Authority London Assembly Members
All London local authority ward councillors
Department for Transport

Greater London Authority

Greater London Authority
Mayor's Design Advisory Group

[the remaining list below will also be categorised by stakeholder group for ease of reference prior to publication]

1Love
20s Plenty
50+ restart
A.S. Watson Group
A2Dominion Homes Limited
Abbey Children's Centre Nursery
Abel and Cole
About Me Care & Support
AccessAble
Action and Rights of Disabled People in Newham
Action Disability Kensington & Chelsea
Action for hearing loss
Action on Disability
Action Space
Action Vision Zero
Addiscombe and Shirley Park Residents Association

Addison Lee
ADM
Adults and Health
Advance Housing and Support Limited
Advanced Propulsion Centre
Advocacy for All
Advocacy in Greenwich
Advocacy Project
Aecom
Aerodyne UK
Affinity Sutton Homes Limited
African & Caribbean Heritage Association
African French Speaking Organisation
Age UK
Ageing Better in Camden
Aggregate Industries
Agility Fuel Solutions
Aimer Products Limited
Air Liquide
Al Manaar- The Muslim Cultural Heritage Centre
ALD Automotive
Aldgate BID
Alexandra Park School
All Safe and Sound Ltd
Allison Transmission
Alzheimer's Society
AmicusHorizon Limited
Amma Radek Business Consulting
Anchor Trust
Anderson Grant
Andrew.Blake001@xpo.com
Angel Association
Angel Trains
Angel.London
AP Webb Plant Hire
APT Controls Group
ARCA Generation
Argall BID
Argent LLP
artsrichmond
Asda
Asian People's Disability Alliance
Asian Women's Lone Parents Association
Aspire Wellbeing

Association of Leading Visitor Attractions
Association of Muslims With Disabilities
Asthma UK and British Lung Foundation
Astra Vehicler Technologies Limited
Asylum Aid
Atkins Global
Augustins Solicitors
Automania Group
Avro UK
Axle Haulage
B.A.P Theatre LTD
B2B Surge Web Design and Marketing
Babcock International
Baker Street Quarter Partnership
Balham Resource Centre
Ballard Power
Barbican Association
Barclay Road Residents Association
Barclays
Barking & Dagenham Access Group
Barking & Dagenham Children's Centre
Barking & Dagenham Chamber of Commerce
Barking and Dagenham Leaseholders Association
Barking Reach Residents Association
Barnes Community Association
Barnet Bipolar Self Help support group
Barnet Lone Parent Centre
Barnet Parent Carer Forum
Barnet Residents Association
Barnet Society
Barnet Torch Fellowship Group
Barnet, Enfield and Haringey Mental Health NHS Trust
Barts NHS Trust
BC Wiles & Son Limited
BD Auto
Be Richmond BID
Becontree Residents Association
Becontree Ward Central Tenants and Residents Association
Beddington Industrial Area BID
Bee Midtown BID
Belvedere Forum
Betar Bangla
Better Archway
Better Bankside BID

Bevis Marks Synagogue
Bexley African Caribbean Community Association (BACCA)
Bexley Association of Turkish Speakers (BATS)
Bexley Churches Housing Association Limited
Bexley Civic Society
Bexley Clinical Commissioning Group
Bexley Deaf Centre
Bexley Dodgers Boccia Club
Bexley Down's Syndrome Group
Bexley Neighbourhood Watch
Bexley Snap
Bexley Voluntary Service Council
Bexleyheath & District Club for the Disabled
Bexleyheath Town Centre BID
BFBi
BID Foods
Biffa
Biggin Hill Community Care Association
Biocentre
Bioregional
Blakeney Group (Lloyd Webber theatres)
Blenheim - Insight
BlindAid
Blue Bermondsey BID
Blue House Yard
Bluebird Care (Enfield)
BME Health Forum
Bmm Limited
Boc UK
Borough Market
BP Chargemaster
BPF
BPR Logisitics
Brake charity
Brake Foods
Breathe Easy Brent (British Lung Foundation)
Brent (Mental Health) User Group (BUG)
Brent Disability Forum
Brent Gateway Partnership
Brent Irish Advisory Service
Brent Visual Impairment Service
Brewery Logistics Group
Brewing, Food & Beverage Industry Suppliers Association
Bridge Renewal Trust

Britannia Village School
British Afghan Women's Society
British Beer and Pub Association
British Blind Sport
British Chambers of Commerce (BCC)
British Disabled Angling Association
British Gas
British Heart Foundation
British Independent Retailers Association
British Land
British Property Federation
British Retail Consortium
British Vehicle Rental and Leasing Association
British Youth Council
Brixton BID
Brixton Forum
Brockley Hill Residents' Association
Bromley Experts by Experience CIC
Bromley Living Streets Group
Bromley Mobility Forum (XbyX Bromley)
Bromley Voice
Bromley Well
Broomfield School
BRVLA
BT Internet
Bubic
Build UK
BYC Transport
BYD
c40 Cities
Calor
Camden Carers' Group and Former Carers' Group
Camden Carers' Service
Camden Chinese Community Centre Chinese Housebound Project
Camden Cutting
Camden Cyclists
Camden Disability Action
Camden Learning Disabilities Service
Camden People First
Camden Society Choices
Camden Town Unlimited
Campaign for Better Transport
Canary Wharf Group
Canary Wharf Limited

Canonbury Society
Capel Manor College
Carers Hub
Carers Network
Carers' Support (Bexley)
Carers Trust Lea Valley Crossroads Care Service
Carers UK
Carousel
Cartwright Group
Cassel Hospital
Castlehaven Community Association
CECA
Celebrations Theatrical Group
Cenex
Central and North West London NHS Foundation Trust
Central Croydon Community Action
Central London Alliance
Central Middlesex Hospital
Centre 404
Centre for Cities
Centre for London
Certax Accounting (Enfield)
Certitude Travel Buddies
Chace Community School
Chadwell Heath Residents Association
Chainreaction
CHARGE
Charlton Athletic Community Trust
Chartered Institute of Environmental Health
CHASE Residents' Association
Chattham Hall
Chauffeur and Executive Committee
Cheapside Business Alliance
Chestnuts, Haringey
Cheviots Childrens Disability Service
Chickenshed
Child Accident Prevention Trust
Chingford Line User Group
Chislehurst and Sidcup Housing Association
Choice in Hackney
Choice Support
Christian Action Housing Association
Churches Together
CILT UK

Citizens Advice
City Connections Service (Part of Age UK East London
City Gateway Women's Project
City Scaffolding
CitySprint Group
Civil Engineering Contractors Association (CECA)
Clapham Park Forum
Clapham Transport Users group
CleanAir London
Clearchannel
Clipper Group
Close Bothers
Club SW18-2-35
CNG Fuels
CNH Industrial
CNH Industrial Supplier Portal
Cold Blow Residents Association
Cold Chain Federation
Commercial Limited
Community Cafe, Newham
Community Cook Up, Haringey
Community Southwark
Community Waltham Forest
CoMo
Compass
Confederation of British Industry (CBI)
Confederation of Passenger Transport
Conquest Art
Considerate Constructors Scheme
Construction Industry Council (CIC)
Coolvan
Co-operative Development Society Limited
Co-operative group
Copper Mill Heights Resident Association
Coppies Grove Residents Association
Core Cities UK
Cornerstone Business Recovery
Coulsdon West Residents' Association
County Hall Owners and Residents Association (CHORA)
Covent Garden Community Association
CPC Training
Craftory Workshop
Craving Coffee, Haringey
Crayford Community Centre

Crayford Forum
Craymill Housing Co-operative Limited
Creartives Industries Federation
Creative Industries Federation
Creative Support, Haringey
Cross River Partnership
Crossriver Partnership
Crossroads Care Enfield
Croydon BAME forum
Croydon BID
Croydon Communities Consortium
Croydon Disability Forum
Croydon Mobility Forum
Croydon People First
Crutch Haringey
Cultural Industries Development Agency
Cummins
Cycle Islington
Cypriot Elderly and Disabled Group (Enfield)
Dachser
DAF Trucks
Daimler
Dairy Crest
Dalgarno Trust
Darul Aman Trust (MASJID)
DASH
Deaf Access
Deaf club
Deaf Ethnic Women's Association (DEWA)
DeepStore
Dennis Eagle Limited
Department for Transport
DHL
DHL UK
Disability Action
Disability Advice Service
Disability Alliance
Disability Backup
Disability Equality Forum
Disability Horizons (online magazine)
Disability Inspired Alliance
Disability Network Hounslow
Disability Rights UK
Disabled Go

Disabled Motoring
Disablement Association Barking and Dagenham (DABD)
Doddle
d'Or to Door
Dorjechang Buddhist Centre
Dorset Community Association
Dovetail Community Outreach
Dowsett Estate Residents' Association
DPD
Drew School
E20 Stadium
Ealing Centre for Independent Living
Ealing Community Network
Ealing Hospital
East Coulsdon Residents' Association
East Homes Limited
East London Advanced Technology Training
East London Chinese Community Centre
East London Garden Society
East Surrey Transport Committee
East Thames Group
Eastend Homes
Eastside Youth Havering
Ebrahim Community College
Edmonton County School
Eezehaul
EHI
Elders Voice
Elevation Training and Empowerment CIC
Elevation-Profile C.I.C.
Elfrida Rathbone Camden
ELOP - East London out Project
Emoss
EMSOL
Energy Saving Trust
Energy Saving Trust
Enfield
Enfield Bangladesh Welfare Association
Enfield Carers Centre
Enfield Caribbean Association
Enfield Clubhouse
Enfield County School
Enfield Disability Action
Enfield Grammar School

Enfield Health and Social Care Partnership
Enfield People's Project
Enfield Racial Equality Council
Enfield Saheli
Enfield Somali Community Association
Enfield Turkish Cypriot Association
Enfield Vision
Enfield Visually Impaired Bowls Club
English Heritage
Enterprise Enfield
Environment Agency
EO Charging
Epilepsy Society
Erith Group
Erith Town Forum
Essex Wildlife Trust
Europ Car
European Commission
Eurovia
Euston Design
Euston Town Unlimited
Event Concept
Every Parent & Child
Evo Group
Evo-Group
Excalibre Technologies
ExCel Exhibition Centre
Excel Women's Centre
Excitech Ltd
Faith Regen Foundation Limited
Faiths Together in Croydon
Faiths Together in Lambeth
Family and Youth People
Family Mosaic
Fastsigns Enfield
Fawcett Society
Federation of Licensed Victuallers Association
Federation of Small Businesses
Fedex
Ferry Lane Action Group (FLAG)
Ferry Lane Primary School
Fight for Peace
Fight for Sight
Fitzrovia Partnership

Fitzrovia West Neighbourhood Forum
Fleetcor
Flush Media
FM Conway
Foodbank Wandsworth
Ford
Fountains Mill Young People's Centre
Freight Transport Association
Friends of African Caribbean Carers and Sufferers of Dementia
Friends of Alexandra Park
Frigoblock
Fruit 4 London
Fulham Estate Residents Association
Fusion Foods
Future Wood Green BID
FWD UK
Gallions Housing Association
Gap Hire Solutions
Gargaar Somali Welfare Association
Gasrec
Gateway Club - Orpington and Bromley
Gateway Housing Association
Gatwick Airport
Genesis Housing Association
Ghanaian Welfare Association
GLH
GMB Union
Gnewt
Go Golborne Project
Godwin Lawson Foundation
Goldy Goldy Asian Women's group
Grange Day Centre
Great Ormond Street Hospital for Children NHS Foundation Trust
Great Portland Estates plc
Greater London Forum for Older People
Greek & Greek Cypriot Community of Enfield
Green Cross First Aid Training Enfield
Green Lanes Shopping Centre
Green Stick Energy
Greenhous
Greenwich Association of Disabled People
Greenwich Mums
Greenwich University
Grundon Waste Management

Guedst Motors
Guide Dogs UK
Guy's and St Thomas NHS Trust
H A Boyse & Son
H2gogo Industries
Habinteg Housing Association Limited
Hackney and Tower Hamlets Friends of the Earth
HACS
Hale Village
Hammermith BID
Hammersmith & Fulham Community Transport Project
Hammersmith & Fulham Disability Forum
Hammersmith & Fulham Federation of Tenants and Residents Association
Hammersmith & Fulham Local and Vocal Hub
Hammond Transport
Hampstead Village BID
Hampton Wick Society
Haringey Advisory Group on Alcohol (HAGA)
Haringey Association for Independent Living (HAIL)
Haringey Association of Neighbourhood Watches
Haringey Borough Women's Football Club
Haringey Boxing Club
Haringey Citizens Group
Haringey Clinical Commissioning Group
Haringey Cycling Campaign
Haringey Law Centre
Haringey School Liaisons
Haringey Sixth Form College
Haringey Wheelchair User Group
Haringey Women's Forum
Harringay Traders
Harrow & Brent United Deaf Club
Harrow Association of Disabled People
Harrow BID
Harrow Cyclists
Harrow Federation of Tenants & Residents' Associations
Harrow Monitoring Group
Harrow Rail Users Group
Harrow Samaritans
Hatton Garden BID
Havering Association for People with Disabilities
Hazel Housing Co-operative Limited
HBC Community Centre

Healthwatch Enfield
Healthwatch Lambeth
Healthwatch Tower Hamlets
Heart of London BID
Heatham House Youth Centre
Heathrow
Heathrow Airport
Hermes Europe
Hexagon Housing Association Limited
Hien Le & Co Chartered Accountants
Higham Residents Association
Highbury Fields Association
Highbury Roundhouse Community Centre
Highgate Neighbourhood Forum
Highgate School
Highgate schools transport coalition
Highgate Society
Highway House
Highway of Holiness Youth Club and Training Centre
Hilldrop Community Centre
Hillingdon Access & Mobility Forum
Hillingdon Asian Womens Group
Hillingdon Autistic Care and Support
Hillingdon Community Transport
Hillingdon Dads
Hillingdon Somali Women's Group
Hillside Church
Hillside Clubhouse
Hilton
Hindu Society
Historic England
Holiday Inn Stratford
Holmes Seafood
Holy Trinity Church
Home-Start Haringey
Hope and Restoration/trading as H&R Training Professionals
Hope in Tottenham
Hotchkiss Limited
Hounslow
Hounslow Deaf Club
Hounslow Disability Forum
Housing & Care 21
Howdens
HTC UK

Hurst Community Centre
HuskBrewing
Hyde Housing Association Limited
I C E Marketing Limited
Ibscott and Wyhill Tenants and Leaseholders Association
Iceland
IER
Ikea
Iford BID
Iford Shopmobility (Disability Redbridge)
Ilse Amlot Centre for Women and Children
Image-Line
Imperial College Healthcare NHS Trust
Imperial College London
IN Streatham BID
IN West Ealing
Inclusion London
Independent Disability Advisory Group
Independent Living Agency
Innogy
Innovate UK
Institute of Couriers
Institute of Couriers
Institute of Directors
Institute of Psychotherapy and Disability
Institution of Civil Engineers (ICE) - London
Into University
Iranian Community Service
Isleworth Explorers Club
Islington Archaeology and History Society
ITM Power
J Coffey Construction Limited
Jags Foundation CIC
Jami (Jewish Association for Mental Health)
Jays Logistics
Jewish Deaf Association
JFG Communications
John Lewis Partnership
Joint Mobility Unit
Joulevert
Just Say Parents Forum
Katherine Low Settlement
Keltbray
Keniston Housing Association Limited

Kensington & Chelsea Forum for Older Residents
Kensington & Chelsea Social Council
Kensington and Chelsea Forum
Kensington and Chelsea Health Trainer Service
Kensington Residents Group
Kent Association for the Blind
Kent Solicitors
KeolisAmey Docklands London
KEY Knowledge Enriches You
Kilburn Older Voices Exchange (KOVE)
Kilnbridge
Kimpton Industrial Park Proprietors Association
Kingston First
Kingston Wellbeing Substance Misuse Service
Knights of Old Group
KNK Group
Kongolese Children's Association
KOVE - Kilburn Older Voices Exchange
Kuehne+Nagel
L Lynch Plant Hire and Haulage
Lambeth Chinese Community Association
Lambeth Cyclists
Lambeth Dementia Alliance
Lambeth Living Well Collective (the Collaborative)
Lambeth Multi-Faith Action Group
LDN 4U
LDN Drop-in Hub (Westminster)
LDV
Learning Disabilities Forum
Learning Disabilities Partnership Board
Lefkara Association of Great Britain - Enfield Branch
Leftley Estate Community Association
Leonard Cheshire Disability
Let's Go Business Hub
LEVC
Lewisham Nexus Service
Licensed Private Hire Car Association
Licensed Taxi Drivers Association
Limited Edition
Linde
Linden Hall Community Centre
Link Group
Living Streets
Local Voices and Accessible Transport Forum

Logistics UK
London & Quadrant Housing Trust
London Ambulance Service
London and Partners
London Assembly Members
London boroughs
London Calling
London Chamber of Commerce and Industry
London City Airport
London Councils
London Cycling Campaign
London Faiths Forum
London Fire Brigade
London First
London Food Alliance
London Friend
London Gypsy and Traveller Unit
London Higher
London Luton Airport
London Riverside BID
London Road Safety Council
London Senior Social
London Soccerdome
London Stadium
London Tourism Co-operative (SOS)
London Travelwatch
London Vision
London Vision Impairment Forum
London Vision UK
Look Ahead Care and Support
Lordship Hub Co-op
Lordship Lane Primary School
Loughborough Junction Action Group
Loughborough Junction Action Group LJAG
Love Hampton Hill
Love Uxbridge
Love Wimbledon
LowCVP
Lyreco UK
M A Ponsonby Limited
Magtec
Make it Ealing BID
MAN Trucks, Vanes and Services
Marble Arch London

Markfield Beam Engine and Museum
Marks and Spencer
Martin Brower
Marylebone Association
McDonalds PLC
McGrath Group
MCH Associates
McNicholas Construction Services
Mencap
Mental health and wellbeing network
Merlin Entertainments Group
Merton & Sutton Mediation
Merton Centre for Independent Living
Merton Children with Disabilities Team
Merton Park Ward Residents Association
Merton Senior Citizens Forum
Metropolitan Police Service
Middlesex Association for the Blind
MIND
Mineral Products Association
Mitcham Lane Baptist Church
Mitie
ML Power Systems
MMAPP Haulage Contractors
Moat Homes Limited
Mobile Mini
Mobility Services
Moorfields Eye Hospital NHS Foundation
Morrisons Plc
Motorcycle Action Group
Motorcycle Industry Association
Mount Green Housing Association Limited
Mums for Lungs
Muni-Serv (Hire) Limited
Musicians' Union
Muslim Cultural & Welfare Association of Sutton
MWW - Minor Weir and Willis Limited
Nafsiyat Intercultural Therapy Centre
NAS Lambeth Branch
National Asthma Campaign
National Autistic Society
National Farmers' Retail & Markets Association
National Grid
National Market Traders' Association

National Trust
Natural England
NCT - London branches
Network Housing Group
Network of Sikh Organisations UK
New Directions Enfield Learning Disability Support
New River Studios
New West End Company
New West End Company
Newham College of Further Education
NHS confederation
NHS South East London
Night Time Industries Association
Nightingale Community Hospice
No Place for Hate Forum
Nomad Power
North Central London NHS CCG
North Cray Neighbourhood Centre
North Cray Residents' Association
North East London NHS CCG
North London Asian Care
North Middlesex University Hospital
North West London NHS CCG
North West London wheelchair services user
Northumberland Heath Community Forum
Northumberland Park Advice Service
Norwood Action Group
Norwood Forum
Notting Hill Housing Trust
NRG Fleet Services Limited
O2 Arena
Oakleigh School and Early Learning Centre
Oasis Academy Hadley
Ocado
O'Donovan Waste Disposal
Old Ford Housing Association (Circle Housing)
Omega Housing Limited
One Housing Group Limited
Orbit South Housing Association Limited
Organic Power
Orpington First
Outward Housing
Oxleas NHS Foundation Trust
Parcelforce

Parent Forum
Parents Forum Resource Group
Park Avenue Disability Resource Centre
Park View School, West Green
Parkinsons UK
Parkside Community Centre
Pavillon resident association
Pbworld
Peabody Group
Peabody Trust
Pearsons in Enfield
Pembury House
Perryview Housing Co-operative Limited
Pizza Express
PLOS Theatre Company
Pod Point
Poplar HARCA
Port of London Authority
Positively Putney BID
Praxis Community Projects
Prestige Cars and Couriers
Pret
Private Hire Board
ProHire
Providence Row Housing Association
Public Health England
Purley BID
PwC
Queen Elizabeth Foundation Mobility Services
RAC
Rail Delivery Group
Rail Freight Group
Rainbow Hamlets
Rainbow Trust Children's Charity
Rainham ROYALS Youth Centre
Ramblers
Ramblers Association
RBKC Mobility Forum
Real - Local Voices and Accessible Transport Forum
Redbridge Disability Association
Redbridge Disability Consortium
Refugee & Migrant Network Sutton
Reliagen Holdings Limited
Remploy

Renault Trucks
Respond
Restore Document Management Services
Retail Motor Industry Federation
Rethink advocacy
Rexel
Reynolds Catering Supplies
Richmond
Richmond and Kingston Accessible Transport (RaKAT)
Richmond Concern Society
Richmond Music Trust
Richmond Royal Hospital
Richmond Transport and Mobility Forum
Richmond Upon Thames Forum for Older People
Riverford Home Delivery
Riverside Community Association
RMS Boat Transport
RNIB
Road Haulage Association
Roadpeace
Rollapaluzza Events
RoSPA
Rotary Club - Bromley
Route Monkey
Royal Association for Deaf People
Royal Mail
Royal National Orthopaedic Hospital NHS Trust
Royal Society of Blind Children
RUILS/Mobility Forum and Transport Action Group
Ruislip Young People's Centre
Russian community Association
Ryder Limited
Sacred Heart Church
Sainsburys
Saints Transport
Salvation Army
Sanctuary Housing Association
Sangam
Sarah Hope Line
Scania
Scarab Sweepers
Scope
SE5 Forum for Camberwell
Sensory Needs Forum

Service User Network (SUN)
SFS Group
Shell
Shepherds Bush Housing Association Limited
Shred Station
Sidcup Community Group
Sidcup Partners
Sidcup Youth Centre
Siemens
Siemens Crystal
Simply Waste Solutions
Sir Robert McAlpine
Sisters In Islam - Muslim Youth Club
Skanska
Skanska UK plc
Skills & Training Network
Sky
Slade Green Community Forum
Smith Brothers Stores (SBS)
Smithfield Market Traders Association
SMMT
Society Links Tower Hamlets
Society of London Theatre
Society of London Theatre (SoLT)
Society of the Golden Keys
Somali Elderly and Disabled Centre
Somali Parent and Children Play Association
Somerset House Trust
South East London Chamber of Commerce
South East London NHS CCG
South East London Vision (SELVIS)
South Sutton Neighbourhood Association
South West London NHS CCG
South Wimbledon Business Area
Southbank Partnership
Southeast Cranes
Southern Housing Group Limited
Southwark Disablement Association
Southwark Mobility Forum
Spare Tyre - Arts and Theatre
Speak Out In Hounslow
Spitalfields Housing Association
Sprout Community Arts
St Ann's Hospital

St Barnabas Monday Club
St Hilda's Community Centre
St John's Hill Centre
St Josephs Pastoral Centre
St Margarets Community website
St Michael's Primary School
St Michael's School of Governors
St Mungos
St Peters Italian church
Stand In The Gap
Stifford Community Centre
Stockwell Forum
Stratford Original BID
Streatham Action
STS First Aid
Successful Sutton BID
Sundridge Park Working Mens Club
Sustrans
Sutton Centre for Equalities
Sutton Community Transport
Sutton LGBT Forum
Sutton Salvation Army
Suzannahkwok.com
Suzy Lamplugh Trust
Swan Housing Association
SWTV Limited
Talk Talk
Tamil Relief Centre
Tarmac
Teachers' Housing Association Limited
Team London Bridge
Tech London Advocates
techUK
Teddington Memorial Hospital
Teddington Society
Teddington Town website
Tesco
Tevva
Tf Couriers
Thames Clipper
The AA
The Crown Estate
The Disability Confident Action Group
The Engine room

The First Mile
The Islington Society
The Kingston Association for the Blind
The Kingswood Centre
The Lesbian and Gay Foundation - LGBT Carers Online Forum
The Mall Wood Green
The Manor House Centre for Psychotherapy and Counselling
The Mill Project
The Northbank London
The O2 Arena
The Portman Estate
The Purple Penguin Club
The Residents' Society of Mayfair & St. James's
The Riverside Group Limited
The Road Transport Consultancy
The Rooted Forum
The Royal Association of Deaf People (RAD)
The Royal Society for the Prevention of Accidents
The Shane Project
The Soho Society
The Sulgrave Youth Club
The United Kingdom Warehousing Association
The Vue
The Wenta Business Centre, Enfield
TheCityUK
This is Clapham
Thomas Pocklington Trust
Tideway London
Tippers
TJX Europe
TNT
Totally Richmond
Tottenham Hale Retail Park (Workman Retail)
Tottenham Hotspur Football & Athletic Co. Ltd
Tottenham Hotspur Foundation
Tottenham Traders Partnership
Tower Hamlets Accessibility Forum
Tower Hamlets Community Housing
Tower Hamlets Homes
Tower Hamlets Inter-Faith Forum
Tower Hamlets Mental Health Partnership Group / Community Options Involvement Network
Tower Hamlets Wheelers
Town and Country Housing Group

Townshend Close Housing Co-operative Limited
Tracsis Plc
Trailblazers, Muscular Dystrophy UK
Transport Focus
Transport Focus
Transport for All
Transport for All
Transport for West Midlands
Transtex
Try Twickenham BID
TTR Limited
UCL
UK Coach Operators Association
UK Hospitality
UK LPG Limited
UK Power Networks
Unicef UK
Unite Students
United Private Hire Drivers
United Utilities Plc
University College London Hospital NHS Trust
University College London Hospitals NHS Foundation Trust
University of Cambridge
University of East London
University of the Third Age
University of Westminster
UPS
Valuing People Network
Vans A to Z
Vauxhall One
Vehicle and Operator Services Agency
Visit Britain
Visit London
Visually Impaired in Camden
Voltia
Volvo
VP Plc
W Howard Group
W9 Empowerment Group
Waitrose
Wake Up Docklands
Walls and Ceilings
Waltham Forest Disability Resource Centre
Waltham Forest Mobility Forum

Walthamstow Village Residents Association
Wandle Housing Association Limited
Wandsworth Community Transport
Wandsworth Learning Disabilities Network
Wandsworth LGBT Forum
Wandsworth mental health resource centre
Wandsworth Mobility Forum
Wandsworth Older People's Forum
Wandsworth Town BID
Wapping Bangladesh Association
Warburtons
Warwick Gardens Residents' Association
Waverley School
We Are Waterloo
Wego Couriers
Wellbeing Connect
Wembley Taekwondo
Wembley United Synagogue
West Drayton Young Peoples Centre
West Hampstead Amenity & Transport (WHAT)
West Hampstead Parents Group
West Indian Self Effort (WISE)
West Indian Senior Citizen Organisation (WISCO)
West Lea School
West Norwood & Tulse Hill BID
Westfield Group
Westminster Chapel
Westminster Drug Project
Westminster Property Association
Westside Young Leaders Academy
Westside Young People Centre
WestTrans
Westway Community Transport
Wheels for Wellbeing
Whirlpool
Whitehorse Youth Centre
Whitworth Housing Co-operative Limited
Whizz-Kidz
Wildfire Urban Key
Willesden 2011 Judo Club
Willesden 7th Day Adventist Church
Willesden and Brent Chess Club
Willesden Cycling Club
Willesden District Scouts

Willesden Green Baptist Church
Willesden Green Town Team
Willesden Local History Society
Willesden Sportability Club
Willesden Sports Centre
Willesden Supplementary Saturday School
Willesden Triathlon Club
Willesden Volleyball Club
Willow Lane BID
Wincanton plc
Wingate and Finchley FC Disabled Fans' Forum
Winvisible (Women With Visible and Invisible Disabilities)
WJ UK
Women's Institute (North West London)
Wood Green Works
Woodside High School
Work Rights Centre
XPO Logistics
Yellow Pavilion
Yoga in Daily Life Association UK
Yogi Divine Society (YDS UK)
Young Brent Foundation
Young Roots
Young's Football Coaching School
Your Life You Choose
Youth Action Diversity Trust
Youth Engagement Solutions Ltd
Youth Offending Service
Youth with a Mission Urban Key (London)
Yum
Yusuf Islam Foundation
Zebra Cross Childrens' Club

Appendix F: Responses to issues raised

Our consultation proposing to increase TfL PCN level for contraventions on the TLRN sought views on:

- How effective a proposed increase in the PCN to £160 would be in reducing contraventions on the TLRN
- What particular difficulties of hardships the proposed increase might cause, including whether this might unfairly penalise any particular road user groups.

Below are responses to issues raised during the consultation.

Issue	Response
<p>The proposed charge is too high/ expensive and would cause financial stress</p>	<p>Enforcement is important to help manage driver behaviour on London's roads. A PCN is a deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of our strategic road network.</p> <p>We are committed to keeping the Capital moving, working, and growing and to achieve this we take fair and proportionate enforcement action across the TLRN to help manage road user behaviour. Our roads carry over a third of all London's traffic and we enforce parking, loading, bus lane and moving traffic contraventions to keep traffic moving safely and efficiently for the benefit of all road users.</p> <p>Our aim is to improve compliance, not to penalise drivers. We publicise the rules of the TLRN as well as ensuring that all on-street signage and road markings required to enforce the rules is fit for purpose.</p> <p>Signs and road markings along the TLRN are there to tell road users what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings. The rules for red routes are also clearly explained in the latest edition of the Highway Code and are also explained on the TfL website here:</p>

Issue	Response
	<p data-bbox="671 266 1406 342">https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes).</p> <p data-bbox="671 376 1406 618">All PCNs include information about making a representation (challenging the PCN) and how long you have got to do it. Representation can be made, online, in writing or via the phone service. More information, including escalation to London Tribunals can be found here:</p> <p data-bbox="671 629 1390 705">https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>
<p data-bbox="188 741 564 860">Concern about time of implementation during the pandemic / difficult times</p>	<p data-bbox="671 741 1401 860">The level of the PCN for contraventions on the red route network has not increased for over ten years, since April 2011.</p> <p data-bbox="671 896 1410 1137">There is a compelling case for increasing the PCN to ensure that it remains an effective deterrent to non-compliance. The PCN has not increased in line with inflation and the level of non-compliance remains high. Contraventions create safety hazards, disruption, and congestion.</p> <p data-bbox="671 1173 1410 1464">The proposed PCN increase is in line with inflation, so it remains an effective deterrent. Inflation on goods and services in the UK averaged at an increase of 2.6% a year between 2011 and 2019, meaning £130 of goods and services in 2011 would cost £162.03 in 2020. In real terms, this means that this penalty has decreased in value and deterrence from £130 to around £105.90 (in 2011 prices).</p> <p data-bbox="671 1500 1406 1619">A 50 per cent discount will be applied to PCNs paid within 14 days and robust representation and appeal processes are in place to challenge PCNs.</p> <p data-bbox="671 1655 1406 1989">Customers who believe they should not have received a PCN for a contravention on the TLRN or have mitigating circumstances can make a representation to TfL. If we reject the representation, customers can make an appeal to the independent adjudicator. Should an appeal be lodged, we may use our discretion to hold a discounted payment rate at any time.</p>

Issue	Response
	<p>More information on representations and appeals can be found on our website here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>
<p>The proposal to increase the charge is a money- making exercise and not related to a policy</p>	<p>We have a legal duty under Section 16 of the Traffic Management Act 2004 to ensure the efficient and safe movement of traffic using our road network. The red route comprises 550km of the most important, strategic routes in London, and enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the red route. By law, net revenues from TLRN contraventions must be used for relevant transport purposes in London. Income covers the cost of the enforcement operation.</p> <p>In 2019/20 surplus revenue generated from the enforcement of TLRN contraventions was invested in making improvements to the Capital's transport infrastructure. Examples include:</p> <ul style="list-style-type: none"> • £16.8m for the Roads and Bridges programme for improving the quality of street conditions and bridges, including safety. • £10.5m for the Road Safety Programme of initiatives to reduce road casualties including engineering schemes and road safety campaigns • £3.9m for the Walking and Cycling Programme of improvements for pedestrians, including on London borough roads, and investments in cycling initiatives. • £3.9m for Bus Network Improvements, for continued enhancement of London's bus infrastructure, expansion of 24-hour routes and expansion of CCTV on buses
<p>The proposal is unfair to those that accidentally contravene (i.e.</p>	<p>Our aim is to improve compliance, not to penalise drivers. We actively promote the rules of the TLRN</p>

Issue	Response
visitors, those unfamiliar with new road layout)	<p>as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings along the TLRN are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings. The rules for Red Routes are clearly explained in the latest edition of the Highway Code and are also explained on the TfL website (https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes).</p> <p>All PCNs include information about making a representation (challenging the PCN) and how long you have got to do it. Representation can be made, online, in writing or via the phone service.</p> <p>More information, including escalation to London Tribunals can be found here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>
The current charge of £130 is sufficient and should not increase	<p>The level of the PCN for TLRN contraventions has not increased for over ten years since April 2011.</p> <p>The proposed PCN increase is in line with inflation, so it remains an effective deterrent. Inflation on goods and services in the UK averaged at an increase of 2.6 per cent a year between 2011 and 2019, meaning £130 of good and services in 2011 would cost £162.03 in 2020.</p> <p>Comparatively, in real terms, this means that this penalty has decreased in value and deterrence from £130 to around £105.90 (in 2011 prices). There has been a 26 per cent increase in total PCNs issued between 2016 and 2019 and in reoffending rates. The increase in the PCN level will only impact on those that contravene the regulations which are in place to ensure the safety and reliability of the network.</p>
An increase to the charge would disadvantage or unfairly	Our enforcement of the rules is fair and proportionate. Only those that contravene the rules

Issue	Response
<p>target those that use the roads for work (freight, deliveries, taxi and private hire, small business)</p>	<p>would be impacted by the increase in the PCN level.</p> <p>All drivers, including those that use the roads for work, must comply with the rules. The rules for the red route, which comprises of 580km of the most important, strategic routes in London, are essential for the safety and reliability of the road network. Improving the compliance with the rules benefits all road users, particularly those that drive for work, who may be reliant on loading bays being available for deliveries and can be more impacted by disruption and congestion.</p> <p>We have published information in the Freight and servicing action plan where through significant dialogue we have a better understanding of the challenges facing the freight industry.</p> <p>The Freight and Servicing Action Plan details how we continue work to address challenges, ensure solutions are sustained and enhanced over time. We continue to work with all partners to engage with wider business activity, including future thinking on our strategy for kerbside use, to ensure business can receive the goods and services they need through a clear and joined-up approach.</p> <p>Further information on the Freight and Servicing action plan can be found on our website here: http://content.tfl.gov.uk/freight-servicing-action-plan.pdf</p> <p>All PCNs include information about making a representation (challenging the PCN) and how long you have got to do it. Representation can be made, online, in writing or via the phone service.</p> <p>More information, including escalation to London Tribunals can be found here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notices/make-a-representation</p>

Issue	Response
<p>An increase to the charge would disadvantage motorists in general</p>	<p>Our enforcement of the rules is fair and proportionate. Only those drivers that contravene the rules would be impacted by the increase in the PCN level.</p> <p>All drivers must comply with the rules. The rules for the red route, which comprises of 580km of the most important, strategic routes in London, are essential for the safety and reliability of the road network.</p> <p>Our aim is to improve compliance, not to penalise drivers. Improving compliance will benefit all road users. We expect that a higher PCN level will provide a more effective deterrent thereby reducing the number of contraventions in the medium term.</p> <p>There are robust representation and appeals processes in place for drivers to challenge a PCN. All PCNs include information about making a representation (challenging the PCN) and how long you have got to do it. Representation can be made, online, in writing or via the phone service.</p> <p>More information, including escalation to London Tribunals can be found here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>
<p>Concern about cumulative impact of other charges and restrictions in London</p>	<p>Penalties can be avoided by complying with the TLRN restrictions. The increase in the PCN level will only impact on drivers that contravene the rules for parking, loading, bus lane and moving traffic offences on the TLRN.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road</p>

Issue	Response
	users.
<p>Improve signage to ensure users do not contravene due to lack of or unclear signs and lines</p>	<p>We only use signs and road markings that have been approved by the Department for Transport (DfT). Signs and road markings along the TLRN are there to inform customers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>As part of our ongoing work to monitor and maintain our road network, we continually review locations where PCNs are issued to understand the reasons for lower levels of compliance. We will make changes to signage and road markings, and in some cases to the road layout, where required as well as improving our communications to drivers.</p> <p>Should any issues with signage need to be raised to TfL we provide a service to report issues directly, regardless of contravention, here: https://streetcare.tfl.gov.uk/</p> <p>All PCNs include information about making a representation (challenging the PCN) and how long you have got to do it. Representation can be made, online, in writing or via the phone service.</p> <p>More information, including escalation to London Tribunals can be found here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation. Should signage be found to be unsatisfactory we will write to you confirming you are no longer liable for the PCN/s (Project Change Note/Notice). We will also rectify issues with the signage.</p>
<p>Offer education about rules to avoid confusion and reduce</p>	<p>Signs and road markings along the TLRN are there to inform customers what they can and cannot do. To avoid being issued with a PCN, road-users</p>

Issue	Response
unintended contraventions	<p>should ensure that they follow these signs and road markings.</p> <p>The rules for red routes are clearly explained in the latest edition of the Highway Code and are also explained in detail on our website: (https://tfl.gov.uk/modes/driving/red-routes/rules-of-red-routes).</p> <p>All PCNs include information about making a representation (challenging the PCN) and how long you have got to do it. Representation can be made, online, in writing or via the phone service.</p> <p>More information, including escalation to London Tribunals can be found here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>
Enforcement should be more robust and effective as this would reduce contraventions	<p>Enforcement is a valuable tool in delivering compliance with parking, loading, bus lane and moving traffic contraventions on the TLRN.</p> <p>Our enforcement activity is intelligence-led, fair and proportionate. We prioritise enforcement activity on the contraventions and locations causing the greatest safety risks and disruption, as well as providing a deterrent effect across the network.</p> <p>The PCN level has not kept up with inflation and we are concerned that it no longer provides an effective deterrent. Increasing it to £160 would help deter drivers from contravening, leading to improvements in safety and reliability across the network.</p>
CCTV enforcement alone is not sufficient, such as when people deliberately cover number	<p>In addition to the use of CCTV, on-street enforcement activity is carried out to ensure that road users comply with the TLRN regulations.</p>

Issue	Response
plates to avoid detection	<p>The deterrent effect and subsequent benefits of camera enforcement is well known and understood in London and plays a crucial role in reducing the number of contraventions.</p> <p>Concealment of number plates is a criminal offence. We part fund and work in partnership with the Metropolitan Police Roads and Transport Policing Command lead policing responsibility for London's roads. This includes police action to deal with drivers that are trying to evade detection by concealing or using false number plates.</p>
Allow local authorities to enforce red routes to increase the level of enforcement that take place	<p>Enforcement of contraventions on the TLRN remains our responsibility. We have a legal duty under section 16 of the Traffic Management Act 2004 to ensure the efficient and safe movement of traffic using our road network. We currently enforce the regulations through a combination of CCTV and on-street enforcement and are currently rolling out unattended deployable enforcement cameras (DEC). These cameras can be moved around the network to target areas where non-compliance is causing safety risks or disruption.</p> <p>We part-fund the Metropolitan Police Roads and Transport Policing Command which provides support for on-street parking enforcement. This activity is undertaken by Police Community Support Officers.</p> <p>We will also work with any Authority that raises concerns about a particular site.</p>
Allow exemptions for some businesses such as those delivering post or collecting secure items / residents	<p>We regularly engage with the freight and servicing industry, businesses, and our customers to understand any issues they may have when using our roads. In special circumstances we can relax parking rules, for example if someone is moving</p>

Issue	Response
receiving deliveries	<p>house, making a bulky delivery, or undertaking building works.</p> <p>Further information on Red Route dispensations can be found on our website here: https://tfl.gov.uk/modes/driving/red-routes/dispensations</p> <p>Further information about how we engage with the freight industry can be found in our Freight and servicing action plan, on our website here: http://content.tfl.gov.uk/freight-servicing-action-plan.pdf</p>
Road rules are not fit to support freight and delivery services	<p>The restrictions for the red route, which comprises of 580km of the most important, strategic routes in London, are essential for the safety and reliability of the road network. Improving the compliance with the rules benefits all road users.</p> <p>The Freight and Servicing Action Plan details how we continue to work to address challenges, ensure solutions are sustained and enhanced over time. TfL works with all partners to ensure business can receive the goods and services they need through a clear and joined-up approach.</p> <p>Working with the freight and servicing operators and local businesses, we will consider the design and management of local access, off-street space for loading and on-street loading restrictions in the early design stages, to reduce the impact of freight and servicing on streets.</p> <p>Understanding the needs of deliveries and servicing vehicles is, and will continue to be, an important consideration in our and the boroughs' transformational Healthy Streets schemes.</p> <p>http://content.tfl.gov.uk/freight-servicing-action-plan.pdf</p>
Focus should be towards other poor behaviour on the road network, such as restrictions for	<p>In addition to our enforcement of parking, loading, bus lane and moving traffic offences we also fund and work in partnership with the Metropolitan Police</p>

Issue	Response
<p>cyclists and e-scooter users as well as cars</p>	<p>Roads and Transport Policing Command to tackle illegal and antisocial road user behaviour. This could include activity to deal with cyclist behaviour where this is illegal and poses a safety risk to themselves and others.</p> <p>There is a significant amount of police enforcement activity underway to tackle personal e-scooters which are illegal on public roads. Over 2,000 e-scooters have been seized this year riders are facing hefty fines and points on their licence.</p> <p>Our enforcement is complemented with important education, engagement, and training activity to encourage safe and considerate road user behaviour.</p> <p>We are also taking steps to ensure that anyone using an approved rental e-scooter, rides safely and follows the rules of the road, as well as guidance from the rental operator.</p> <p>We also offer free cycling skills training and route planning advice for Londoners. For more information on how we are planning for cycling an e-scooter use in London, please refer to our website here:</p> <p>https://tfl.gov.uk/modes/driving/electric-scooter-rental-trial#on-this-page-4</p> <p>https://tfl.gov.uk/modes/cycling/</p>
<p>Freight plays a vital role in supporting London. London is at risk of being hostile to freight groups. More should be done to plan for freight and deliveries in support</p>	<p>The restrictions for the red route, which comprises of 580km of the most important, strategic routes in London, are essential for the safety and reliability of the road network. Improving the compliance with the rules benefits all road users.</p> <p>The Freight and Servicing Action Plan details how we continue to work to address challenges, ensure solutions are sustained and enhanced over time. TfL works with all partners to ensure business can receive the goods and services they need through</p>

Issue	Response
	<p>a clear and joined-up approach.</p> <p>Working with the freight and servicing operators and local businesses, we will consider the design and management of local access, off-street space for loading and on-street loading restrictions in the early design stages, to reduce the impact of freight and servicing on streets.</p> <p>Understanding the needs of deliveries and servicing vehicles is, and will continue to be, an important consideration in our and the boroughs' transformational Healthy Streets schemes.</p> <p>http://content.tfl.gov.uk/freight-servicing-action-plan.pdf</p>
<p>Recognition should be given for small businesses whose deliveries are essential to London's recovery from the pandemic</p>	<p>The restrictions for the red route, which comprises of 580km of the most important, strategic routes in London, are essential for the safety and reliability of the road network. Improving compliance with the rules benefits all road users.</p> <p>The Freight and Servicing Action Plan details how we continue to work to address challenges, ensure solutions are sustained and enhanced over time. TfL works with all partners to ensure business can receive the goods and services they need through a clear and joined-up approach.</p> <p>Working with the freight and servicing operators and local businesses, we will consider the design and management of local access, off-street space for loading and on-street loading restrictions in the early design stages, to reduce the impact of freight and servicing on streets.</p> <p>Understanding the needs of deliveries and servicing vehicles is, and will continue to be, an important consideration in our and the boroughs' transformational Healthy Streets schemes.</p> <p>http://content.tfl.gov.uk/freight-servicing-action-plan.pdf</p>

Issue	Response
<p>Some fines are inevitable because the road layout does not factor the need for delivery and collection. This causes a financial and administrative burden.</p>	<p>Working with the freight and servicing operators and local businesses, we do consider the design and management of local access, off-street space for loading and on-street loading restrictions in the early design stages, to reduce the impact of freight and servicing on streets.</p> <p>Wherever possible, TfL considers loading bays in safe locations along the TLRN through our Kerbside Management Plan.</p>
<p>London risks losing more drivers due to increasing financial burden and threat of fines. This will affect economic recovery due to fewer deliveries and increased costs for customers.</p>	<p>The increase in the PCN level will only impact on drivers that contravene the rules on the TLRN. The regulations are essential for ensuring the safety and reliability of the network. We believe a higher PCN level will help deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The higher PCN level should provide a more effective deterrent to contravening the rules.</p>
<p>The proposed PCN level is disproportionate to the offence, particularly when compared to criminal activity where fines are lower.</p>	<p>The proposed PCN increase is in line with inflation, so it remains an effective deterrent. Inflation on goods and services in the UK averaged at an increase of 2.6% a year between 2011 and 2019, meaning £130 of goods and services in 2011 would cost £162.03 in 2020. In real terms, this means that this penalty has decreased in value and deterrence from £130 to around £105.90 (in 2011 prices).</p> <p>The penalties for criminal road traffic offences vary. Fixed Penalty Notices (FPNs) issued by the police range between £50 and £300. Endorsable FPNs also include points on a driver's licence. There are no discounts for prompt payment.</p>
<p>The proposed PCN level is too high for those making a genuine mistake, which is common</p>	<p>All road users should follow the relevant traffic regulations when using the TLRN.</p> <p>Any driver who believes that they should not have received a PCN for a contravention on the TLRN or</p>

Issue	Response
	<p>have mitigating circumstances has the legal right to challenge the PCN.</p> <p>More information on representations and appeals can be found on our website here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notice/make-a-representation</p>
<p>Data should be shared to show who PCNs are issued to. If these are repeat offenders, has there been a route towards better compliance such as changes to time plates to ensure essential delivery/service activity is not being penalised</p>	<p>We do not publish data that identifies individual drivers or businesses as this would be unlawful and inappropriate. Enforcement trends are monitored and inform interventions to help improve compliance while balancing the need for restrictions on London's red routes.</p> <p>The Freight and Servicing Action Plan details how we continue work to address challenges, ensure solutions are sustained and enhanced over time. We work with all partners to ensure business can receive the goods and services they need through a clear and joined-up approach. Working with the freight and servicing operators and local businesses, we will consider the design and management of local access, off-street space for loading and on-street loading restrictions in the early design stages, to reduce the impact of freight and servicing on streets.</p> <p>Further information on our Freight and Servicing Action Plan can be found here http://content.tfl.gov.uk/freight-servicing-action-plan.pdf</p>
<p>There is no data provided to prove whether the PCN level being unchanged for 10 years has had an impact on the number of contraventions.</p>	<p>There has been a 26 per cent increase in PCN volumes for most contraventions between 2016 and 2019. In reviewing contraventions between 2016 to 2019 there was a 300 per cent increase in Bus Lanes contraventions, 31 per cent increase in moving contraventions, 17 per cent increase in CCTV enforcement of parking and loading restrictions and a 27 per cent increase in on street enforcement of these restrictions.</p> <p>Levels fell in 2020 which reflects lower levels of traffic during the pandemic as well as the relaxation</p>

Issue	Response
	<p>of rules for key workers during lockdown periods and reduced enforcement capacity due to covid restrictions. As these factors have or are being eased, we are seeing the level of PCNs issued increase</p>
<p>Information should have been provided as evidence that increasing the PCN level is a more effective deterrent</p>	<p>The cost of the PCN for parking, loading, bus lane and moving traffic contraventions on the red route network has not increased for over ten years, since April 2011.</p> <p>The proposed PCN increase is in line with inflation, so it remains an effective deterrent. Inflation on goods and services in the UK averaged at an increase of 2.6% a year between 2011 and 2019, meaning £130 of good and services in 2011 would cost £162.03 in 2020. In real terms, this means that this penalty has decreased in value and deterrence from £130 to around £105.90 (in 2011 prices).</p> <p>Levels of non-compliance remain too high as indicated by PCN data which shows a 26% increase in PCN volumes between 2016 and 2019 and an increase in reoffending rates.</p>
<p>The Mayor's Transport Strategy identifies 'efficient freight' as a principle of good growth; however, the increased PCN level would not act as an incentive for cleaner, quieter, safer deliveries in London. The PCN level should not raise without a clear policy goal.</p>	<p>The proposal to increase the PCN level is consistent with the goals of the Mayor's Transport Strategy including efficient freight.</p> <p>Key to the safe and efficient operation of the road network is good compliance with road regulations. Poor compliance increases road danger and disruption, negatively impacting efficiency, predictable traffic flow and journey times.</p> <p>The impact of disruption and congestion has significant impacts for the freight industry. Deterring contraventions will benefit all road users.</p>

Issue	Response
<p>Ensure PCN appeals are fair and unbiased. There should be clear advice on timescales for payment at the lower rate.</p>	<p>A PCN is a statutory notice. It is a legal requirement that we include timescales for paying the discounted amount and how to make a representation (challenge) against a PCN.</p> <p>Customers who believe they should not have received a PCN for a contravention on the TLRN or have mitigating circumstances can make a representation to TfL. If we reject the representation, customers can make an appeal to the independent adjudicator. Should an appeal be lodged, we may use our discretion to hold a discounted payment rate at any time.</p> <p>More information on representations and appeals can be found on our website here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notices/make-a-representation</p>
<p>Appeals need to be prompt and not linked to a cost increase while the process is ongoing.</p>	<p>We may use our discretion to accept a discounted payment at any time. If a customer makes a representation within the discounted time period specified on the PCN, we place the PCN on hold until we make our decision. If we reject the representation, we will normally allow a further 14 days to pay the PCN at the discounted rate.</p>
<p>The process for an appeal against a PCN needs to be clear. People who not aware of the process are unfairly penalised/ do not get refunded when someone else is successful in appeal for the same reason</p>	<p>Each case is considered on its own merits. It is a legal requirement that all PCNs must include details of how to challenge the PCN. Customers who believe they should not have received a PCN for a contravention on the TLRN or have mitigating circumstances can make a representation to TfL. If we reject the representation, customers can submit an appeal to the Independent Adjudicator.</p> <p>More information on representations and appeals can be found on our website here: https://tfl.gov.uk/modes/driving/red-routes/penalty-charge-notices/make-a-representation</p>

Issue	Response
<p>Increase the early payment period, i.e. for one month, to allow small business and those that receive a monthly salary a chance to account for the expense</p>	<p>Our data shows that around 90 per cent of drivers who pay the PCN pay it at the discounted rate, so it is reduced to half.</p> <p>A PCN is a statutory notice, and the relevant legislation sets out the time periods during which we must accept a discounted payment. While we may use our discretion to accept a discounted payment at any time, the power to amend the statutory periods sits with central Government.</p>

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