# Public and stakeholder consultation on a Variation Order to modify the Congestion Charging scheme

**Impact Assessment** 

January 2014

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## 1. Introduction

# 1.1 Why is TfL proposing changes to the Congestion Charge?

Proposal 129 of the Mayor's Transport Strategy (MTS) sets out that the Mayor will keep Congestion Charging under review and make variations to ensure the scheme remains effective in reducing traffic and congestion in central London and to improve the operation of the scheme. The scheme has had a number of modifications since it was introduced in February 2003, including to its area, discounts and exemptions, charge and penalty charge level, payment methods, operation and service providers.

The legal framework for the operation of the Congestion Charging scheme is set out in the Greater London (Central Zone) Congestion Charging Order 2004 (the "Scheme Order") which should be amended when any change to the scheme is proposed. Changes are contained in a Variation Order (the Greater London (Central Zone) Congestion Charging (Variation) Order 2013), which must be made and consulted on by TfL before it can be confirmed by the Mayor (with or without modifications), which will enable the changes to the scheme to come into effect.

# 1.2 Proposed changes

TfL's Business Plan includes a proposal to increase the daily Congestion Charge in 2014 in response to inflation. The increase would help to maintain the relative financial deterrent effect of the charge in comparison to other transport costs and public transport fares, ensuring the decongestion effects of the scheme are maintained.

In addition, in October 2015 the Congestion Charging scheme service provision contract will expire. This provides TfL with an opportunity to review the operation of the scheme in order to reduce the costs of operating the scheme and to enhance customer satisfaction. In light of this, changes are also being proposed under the reletting of the Congestion Charging contract.

The proposed changes put forward to be assessed within this impact assessment are:

- Increase in the daily charge
- Enable discount applications and renewals to be made online
- Allow Direct Debit for CC Auto Pay
- Changes to the NHS Reimbursement Scheme

Other minor administrative changes to the Scheme Order are also proposed in the Variation Order but will not have an impact on the operation or users of the scheme. These minor changes are as follows:

- Allow customers to amend the date of a pre-paid charge on the day of travel
- Remove the vehicle seat capacity requirement from the Residents' Discount
- Include reference to card payment failures
- Update the definition for recovery vehicles

The primary rationale behind these changes is to 'clean up' the Scheme Order and align it to what is carried out within the operation in practice. As such, they will have no impact on users or operations and therefore the minor changes listed above are therefore not covered further in this impact assessment.

## 1.3 Background to the proposed changes and their implementation

The changes proposed in the Variation Order aim to address changes in context and/or circumstances that could impact upon the efficient running of the scheme for customers and TfL. The details of the main changes, and the rationale behind them, are outlined in the following paragraphs.

## 1. Increase in the daily charge

Since its introduction in 2003, the Congestion Charge has delivered a significant reduction in traffic and congestion by using the charging mechanism as a deterrent to driving into the central London area. Traffic and congestion negatively impact on London's productivity and efficiency.

As a result of inflation, real-term costs of driving within the Congestion Charging zone have decreased since the charge was last increased in January 2011. The financial deterrent of the charge has therefore eroded over this time and it is necessary to increase the charge in order to maintain the effectiveness of the scheme in limiting congestion. TfL is therefore consulting on proposals to increase the daily charge to address this.

Increasing the charge also helps to maintain the relative deterrent effect of the charge in comparison to other transport costs and public transport fares. This helps to ensure the decongestion effects of the scheme are sustained. This is of benefit to all who travel in the Congestion Charging zone, including private and commercial motor traffic and those using public transport, walking or cycling.

Table 1 sets out the current charges payable through the various payment channels and the changes proposed in this consultation.

**Table 1: Proposed charge increase** 

Payment method	Current charge (since 2011)	Proposed charge (from June 2014)
Standard daily charge	£10	£11.50
CC Auto Pay / Fleet Auto Pay	£9	£10.50
Pay Next Day	£12	£14
Residents CC Auto Pay (daily)	£0.90	£1.05
Residents charge for five consecutive	£5	£5.75
charging days (paid in advance)		
Residents monthly charge (20	£20	£23
consecutive charging days paid in		
advance)		
Residents yearly charge (252 consecutive	£252	£289.80
charging days paid in advance)		

## 2. Enable discount applications and renewals to be made online

Currently, discounts on the Congestion Charge (for example the Ultra Low Emission Discount) are applied for by post. Customers have indicated they would prefer to apply for and renew discounts online, scanning and uploading the supporting evidence rather than having to post it, or post the evidence if they are unable to scan it. This reduces the administration burden for both customers and TfL.

The new service provision contract will provide an opportunity to allow online registration for making applications for discounts, discount renewals, daily charge refunds and charge amendments. TfL proposes that the new system will be introduced in late 2015.

While the vast majority of applications would be made online, TfL would continue to accept postal applications for Blue Badge Discount applications and in cases where the customer was unable to apply online.

## 3. Allowing Direct Debit payments for CC Auto Pay

CC Auto Pay is an automated payment system which records the number of days a vehicle travels within the charging zone each month and bills the account holder's debit or credit card.

This change would allow customers registered for CC Auto Pay to pay their account via Direct Debit. This service has been requested by customers and is already available for Fleet Auto Pay customers.

The change would take place in late 2015 when the new service provision contract commences.

## 4. Changes to the NHS Reimbursement Scheme

A 100 per cent reimbursement of the daily charge applies for certain journeys undertaken by NHS patients and staff. The NHS Reimbursement Scheme does not currently allow the charge to be reimbursed if it was paid via CC Auto Pay and this facility has been requested by customers.

The introduction of the new service provision contract would allow a unique payment reference to be generated for each CC Auto Pay payment which could be used in reimbursement applications. TfL therefore proposes to allow NHS patients and employees who meet the eligibility criteria for the NHS Reimbursement Scheme to apply for reimbursements for charges paid by CC Auto Pay. This change would come into force in late 2015 when the new service provision contract commences.

The restructure of the NHS has meant that Primary Care Trusts have been abolished and their functions have been taken over by Clinical Commissioning Groups. TfL proposes to update the Scheme Order to reflect this change. The proposed changes will ensure that the original intention of the NHS reimbursement scheme is maintained, i.e. that the charge does not act as a barrier to receiving NHS care, in recognition that NHS treatment is universal and free at the point of delivery.

## 1.4 Purpose of the impact assessment

This document provides a detailed assessment of the proposed changes to determine what impacts may be likely to arise and to what degree. The proposed changes are in conformity with the MTS (as is required by Schedule 23 to the Greater London Authority Act 1999) and there is no specific requirement to undertake a Strategic Environmental Assessment in respect of them. However, whilst this is not a statutory assessment, to ensure consistency of approach, the Variation Order has been assessed using the same approach as the earlier impact assessments undertaken to support the MTS, published in May 2010, and the consultations on Variation Orders in 2010 and 2012.

The assessment identifies the current baseline conditions, in terms of traffic levels, costs and revenue, and provides a comparison of the forecast impacts of the status quo (or 'do nothing') scenario with the forecast impacts of the proposed changes in the Variation Order.

# 2. Methodology and overview of analysis of proposed changes

## 2.1 Scope of the impact assessment

An initial screening exercise was undertaken, based on professional judgement, to determine the relevant MTS objectives for this assessment. The MTS objectives have also been mapped against the proposed changes in the Variation Order, using a matrix to determine which of the proposed changes require further assessment against the relevant MTS objectives.

As the Congestion Charging scheme is already in operation, some of the secondary objectives will not be affected in any way by the proposed changes.

Table 1 below sets out the impact rating used in the assessment of the Variation Order against the relevant MTS objectives.

Table 2: Impact rating criteria

++	+	0	-		$\bigg\rangle$
Significant	Minor	Neutral	Minor	Significant	No effect
positive	positive		negative	negative	

The matrix is shown in Table 2 overleaf. The resulting MTS Objectives that are not deemed relevant and the proposed changes that are concluded not to have an impact on the Objectives have been removed from the assessment process.

The detailed assessment covers Economic impacts only, as this was found to be the only MTS Objective which is likely to be impacted upon by the proposed changes. The proposed changes will not have any material effect on equality, health or environment issues compared to the status quo.

Of all the proposed changes in the Variation Order, only the increase in the daily charge is anticipated to have any impact on achieving the relevant MTS Objectives. Therefore this proposed change is analysed in more detail in this Impact Assessment; the other proposed changes are deemed to have no impact and are not subject to further assessment.

Table 3: Assessment of the relevant MTS objectives and impact of the key proposed changes on them

Table 3: Assessment of the relevant WTS objectives	Charge increase	Online	Direct debit	NHS re-
Primary Objective A: To contribute to, and facilitate, more s		applications  fficient economic	payments progress within	
Promote more sustainable transport and travel patterns for all users and potential users of the London transport system	+			
Increase the economic efficiency and environmental sustainability of freight transport and transfer within and around London and the South East	+			
Facilitate and contribute to regeneration across all communities in London				
Contribute to enhanced productivity and competitiveness amongst all businesses within the London area	+			
To help facilitate and contribute to increased employment and earnings especially in low-waged areas				
To contribute to the alleviation of poverty and its contributory factors				
Primary Objective B: To enhance equality and actively mitigate the barriers to this				
To address the key barriers to equality of access for all users and potential users of the London transport system				
To give all users and potential users equal opportunity to access the London transport system and sustainable transport choices				
Primary Objective C: To contribute to enhanced health and	wellbeing for all	within London		
To address health inequalities and factors which negatively impact upon health and wellbeing				
To promote enhanced health and wellbeing for all				
Improve air quality and the noise climate across London				
Primary Objective D: To promote safety and security for all facilities	working, travellir	ng and using Lor	ndon transport s	ervices and
Increase security and resilience to major incidents on the network*				

Increase road safety for vehicles and pedestrians	
Increase staff and passenger safety on all modes of transport	
Contribute to the reduction of crime and fear of crime for all users and potential users of the London transport system*	
Primary Objective E: To contribute to the mitigation of and	adaptation to climate change
To contribute to the reduction of GHG emissions arising from within the London area	
To reduce GHG emissions arising from operations and service provision	
To enhance and facilitate adaptation to the impacts of climate change	
Primary Objective F: To protect and enhance the physical, he public realm	nistoric, archaeological and socio-cultural environment and
To promote more sustainable resource use and waste management	
To protect and enhance the built environment and streetscape through planning and operations	
To protect and enhance the natural and physical environment including biodiversity, flora and fauna through planning and operations	
To protect and enhance greenscapes, riverscapes and waterways through planning and operations	

## 2.2 Methodology

In order to assess the impact of the Variation Order, it is first necessary to describe the baseline situation and how it is likely to evolve if the status quo is maintained, that is if the proposed changes were not introduced (the 'do nothing' scenario).

The assessment utilises analysis undertaken by TfL to understand the impacts of the proposed changes and to establish what wider measures may be required to mitigate any predicted adverse impacts of the proposed changes.

This assessment has identified quantifiable data where possible, and the analysis of impacts is based on the current available information. The identification of the impacts has, however, more broadly relied on qualitative data and the exercise of professional judgement to determine the relative significance and severity or scale of the impacts.

TfL has published six Congestion Charging impacts monitoring annual reports (2003-2008). Monitoring data from the Congestion Charging scheme is also considered in the annual Travel in London reports, the latest of which is Travel in London Report 5, published in 2012. These documents provide the current baseline information for this impact assessment.

# 2.3 Consideration of the general equality duty

As a public body, TfL is subject to the equality duty created under the Equality Act 2010. Section 149 of the Equality Act sets out the general equality duty, which requires TfL and the Mayor to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups, and
- Foster good relations between different groups.

The general equality duty covers protected characteristics, including age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. In line with best practice TfL also considers the needs of groups who also have the potential to be socially excluded, namely: people on low incomes; refugees and asylum seekers; the homeless; and jobseekers.

The equalities impact assessment process was principally based on the Equality and Human Rights Commission Equality Impact Assessment guidelines<sup>1</sup>. The equality impact assessment is conducted in two key stages. The first is an initial scoping stage to see if the proposed changes are relevant or could have implications for equality. The second stage involves fully assessing the proposed changes to make sure they do not have negative or adverse effects on different sections of the impacted communities, including establishing what practical actions would be required to mitigate any adverse or negative impacts and what actions will help promote equality.

<sup>&</sup>lt;sup>1</sup> http://www.equalityhumanrights.com/uploaded\_files/equality\_impact\_assessment\_template.doc

The initial scoping assessment was undertaken and found that there is no evidence that an increase in the Congestion Charge, or any of the other proposed changes, would disproportionately affect any of the equality target groups. As a result of this, it is not considered necessary to undertake a more detailed equalities assessment.

#### 2.4 **Consideration of health impacts**

The Mayor has a legal obligation to meet national and European targets for air quality in London, and a statutory duty to have an Air Quality Strategy. Despite improvements in recent years, transport in London remains a significant source of the air pollutant emissions contributing to the overall concentrations of pollutants in the air and adversely affecting the health of Londoners.

Transport-related noise is also a quality of life issue that could be considered as an impact on health.

The proposed changes were subject to a Health Impact Assessment screening, based upon professional judgement. This determined that the proposed changes were not likely to have a significant effect on health (neither positive nor negative) and that there would be no need to carry out a full Health Impact Assessment upon them.

#### 3. **Economic impact assessment**

#### 3.1 Introduction

An efficient and effective transport system for people and goods is essential to support sustainable economic development and population growth. Congestion is defined as the 'lost' travel time experienced by vehicle users on a road network, in other words the excess travel time is the time spent over and above that which would be experienced under 'uncongested' or 'free-flow' conditions<sup>2</sup>.

Congestion on London's roads costs around £4bn each year<sup>3</sup> and is a huge hindrance to businesses, commuters and the freight industry. The Congestion Charging scheme, introduced in February 2003, has delivered significant traffic reduction benefits in central London. After the first 12 months of the Congestion Charge scheme, measurements of congestion within the charging zone indicated average reductions in congestion of 30 per cent since congestion charging was introduced<sup>4</sup>. Moreover, traffic entering the zone during charging hours was shown to have reduced by 18 per cent and traffic circulating within the zone reduced by 15 per cent.

The economic impacts of the proposed changes are assessed with reference to the effects on:

<sup>&</sup>lt;sup>2</sup> Transport for London, June 2003, Impacts monitoring: Second Annual Report http://www.tfl.gov.uk/assets/downloads/Impacts-monitoring-report-2.pdf

Transport for London, January 2010, RNPR Traffic Note 4, Total vehicle delay for London 2008-09

<sup>&</sup>lt;sup>4</sup> Transport for London, April 2004, Impacts monitoring: Second Annual Report http://www.tfl.gov.uk/assets/downloads/Impacts-monitoring-report1.pdf

- The volume of traffic, traffic speeds and the amount of delay, which in turn impacts on economic productivity.
- TfL revenue and hence investment in transport improvements elsewhere on the network.

The impact on businesses and retailers is also considered to a lesser extent.

# 3.2 Baseline conditions and context

## Traffic volume, speed and congestion

The volume of traffic, traffic speeds and the amount of delay all impact on business efficiency and sustainability and on economic productivity more generally. The following baseline conditions for traffic volumes, speed and congestion have been taken from TfL's most recent Travel in London Report<sup>5</sup>, which looks at changing conditions on London's transport network since 2000.

The general pattern on London's roads over the past decade has been one of a progressive decline in the volume of traffic. The trend towards lower traffic flows has been most pronounced in central London, where vehicle kilometres fell by 23 per cent between 2000 and 2012. The introduction of Congestion Charging in 2003 has had a significant impact in shifting people away from using cars, contributing to an overall reduction in vehicle kilometres in London of 11 per cent between 2000 and 2012.

However, while traffic volumes have been falling within London, traffic speeds have also been getting progressively slower over the past decade; this is particularly the case in central London. The historic decline in traffic speeds is most likely due to interventions that have reduced the effective capacity of the road network in order to improve urban realm, increase road safety and prioritise public transport, pedestrian and cycle traffic, as well as an increase in road works by utilities and general development activity since 2006. This explains the lower levels of congestion reduction compared to the pre-charge baseline: 8 per cent in 2006, compared to 30 per cent in 2004<sup>6</sup>. More recently, in the past six years this trend towards slower traffic movement has ceased and traffic speeds have remained more stable, as evidenced by GPS satellite tracking data from 2006 to 2012<sup>7</sup>.

Indicators of excess delay or congestion also suggest a stable overall picture, with some improvements in the past two years. However, while levels of congestion in central London are close to pre-charging levels, the effectiveness of Congestion Charging in reducing traffic volumes means that conditions would be worse without the Congestion Charging scheme.

http://www.tfl.gov.uk/assets/downloads/corporate/travel-in-london-report-5.pdf

<sup>&</sup>lt;sup>5</sup> Transport for London, 2013, Travel in London Report 6

<sup>&</sup>lt;sup>6</sup> Transport for London, July 2007, Impacts Monitoring: Fifth Annual Report, http://www.tfl.gov.uk/assets/downloads/fifth-annual-impacts-monitoring-report-2007-07-07.pdf <sup>7</sup> Transport for London, 2012, Travel in London Report 5,

### TfL revenues and investment

It is estimated that increasing the daily charge from £10 to £11.50 (along with the associated rises in the other payment methods) would contribute £82.7m in additional Gross Income over the course of the 5 years to 2017/18.

By law, net revenues from the Congestion Charging scheme must be used to improve transport in London. Any positive change in net revenue would therefore positively impact on the level of money available to fund other improvements to the transport network in London.

Over the last decade, £1.2bn net revenue has been generated and has been fed straight into ongoing investment in the capital's transport infrastructure.

## Business and retail

A concern amongst businesses, particularly small businesses, is that Congestion Charging imposes additional direct and administrative costs on them as well as on their customers/clients who may choose to shop/eat or do business elsewhere where the transactions costs are lower. For retailers, there is also a concern that the Congestion Charge adds to their customers' household expenditure, therefore reducing their disposable income.

However, the Congestion Charge is now well-established and therefore, where necessary, built into business plans. Moreover, delays and unreliability of journey times caused by congestion can also discourage customers/clients from travelling to an area, so preventing an increase in congestion that could be caused by removing the deterrent effect could have a positive impact on the attractiveness of an area for visitors and customers.

In summary, as the majority of customers travel to central London by public transport and in real-terms the additional cost to drivers and fleet operators will be relatively small, the broad effects of Congestion Charging on the cost of business operations and on customer disposable income are expected to be marginal. It is possible that some businesses may be advantaged or disadvantaged more than others, but attributing this specifically to Congestion Charging can be difficult.

# 3.3 Expected trends under the status quo

If no changes were made to the Congestion Charging scheme charges and the status quo was maintained, an increase in traffic volumes in the Congestion Charging zone would be expected. This is because as a result of inflation, real-term costs of driving within the Congestion Charging zone have continually decreased since the charge was last increased in January 2011. Inflation between the last charge increase in 2011 and 2014, the year the proposed increase would be introduced, is estimated to be 13 per cent. If the charge level is not adjusted to reflect inflation, there is a decrease in cost in real-terms which has the effect of eroding the deterrent effect of the Congestion Charge.

# 3.4 Assessment findings

# Traffic volume, speed and congestion

The main aim of the Congestion Charge is to reduce traffic volumes and congestion in central London, which negatively impact upon traffic speeds and levels of congestion which in terms impact on London's productivity. The Congestion Charge works by providing a financial deterrent which influences how people choose to travel into central London. If the charge is not increased, the financial deterrent effect is eroded by inflation and in comparison with public transport fares.

Inflation between the last charge increase in 2011 and 2014, the year the proposed increase would be introduced, is estimated to be 13 per cent. The Weighted Average Increase<sup>8</sup> across the payment methods (listed in Table 1) is 16 per cent. Given inflation of 13 per cent, this results in a real-term price increase of just 3 per cent.

The proposed rise is placed slightly (3 per cent) above inflation to ensure that:

- i) The charge retains its deterrent effect for a few years beyond the price increase in 2014 (exact number of years dependent upon future inflation rates). This means that the charge will remain effective without the charge level having to be increased again in the short-term.
- ii) To ensure the charge level is clear and memorable to customers by rounding them to the nearest 50p.

The likely result of not increasing the charge is that traffic volumes will increase, having a detrimental impact journey time and congestion. Therefore increasing the charge will have a small positive effect on traffic volume, journey time and congestion, compared to the 'do nothing' scenario.

Maintaining the deterrent effect reduces the likelihood of drivers being attracted back into the zone. The increase in costs may also deter some drivers who currently pay the Congestion Charge from travelling by car. However, this effect is likely to be minimal, with the strength of the effect dependent on the price-elasticity of those liable to the charge<sup>9</sup>.

## TfL revenues and investment

It is estimated that increasing the daily charge from £10 to £11.50 would contribute an additional £82.7m in additional Gross Income over the next 5 years to 2017/18. To put this in context, in the financial year 2012/13, the Gross Income raised by the Congestion Charging scheme was £222m<sup>10</sup>. As required by law, any increase in TfL's net revenue as a result of the change is reinvested in transport in London.

<sup>&</sup>lt;sup>8</sup> The Weighted Average Increase is derived based on the price increases across the methods and the percentage of customers using each method

<sup>&</sup>lt;sup>9</sup> Transport for London, 2008, Demand Elasticities for Car Trips to Central London as revealed by the Central London Congestion Charge, <a href="http://www.tfl.gov.uk/assets/downloads/demand-elasticities-for-car-trips-to-central-london.pdf">http://www.tfl.gov.uk/assets/downloads/demand-elasticities-for-car-trips-to-central-london.pdf</a>

Transport for London, 2013, Annual Report and Statement of Accounts 2012/13, http://www.tfl.gov.uk/assets/downloads/corporate/annual-report-and-statement-of-accounts-2013.pdf

Over the last decade, £1.2bn net revenue has been generated and has been fed straight into ongoing investment in the capital's transport infrastructure.

In addition to the charge increase, a number of other operational amendments are proposed. As well as improving the service for customers, the aim of these is to reduce the overall system implementation costs when the new system is introduced by the new service provider in 2015, and also to reduce ongoing operational costs by enabling greater efficiency.

- Shift to online registration for discounts: Enabling documents to be scanned and emailed, rather than posted, saves costs and administration for both TfL and the customer. For TfL, the operational cost savings will be significant as fewer staff will be needed to process the discounts.
- Other minor amendments: The other proposed amendments are anticipated to achieve very minor cost savings through a reduction in administration, achieved by updating the Scheme Order to reflect what happens in practice.

Overall, it is considered that the proposed changes to the Congestion Charging scheme would have a positive impact through maintaining TfL's income from Congestion Charging, the net revenue of which must be spent on improving transport (as required by Schedule 23 to the Greater London Authority Act 1999), which is of benefit to all Londoners.

## Business and retail

The impact on business and retail is expected to be neutral, as the cost of the charge is increasing in line with inflation. In addition, businesses and retailers will benefit from the continued success of the Congestion Charge in deterring an increase in traffic volumes, which would lead to increased congestion and delays.

## 3.5 Overall conclusions

Overall, the proposed changes are assessed as having a small positive economic impact compared to the 'do nothing' situation through:

- Maintaining the deterrent effect of the charge in order to prevent an increase in traffic volumes and congestion, which could negatively affect London's economic productivity
- Maintaining TfL's income from Congestion Charging, the net revenue of which must be spent on improving transport (as required by Schedule 23 to the GLA Act 1999), which is of benefit to all Londoners
- Better meeting users' requirements
- Reducing scheme implementation and ongoing administrative costs.

## 3.6 Impact on the MTS Secondary Objectives

The assessment against the relevant MTS Secondary Objectives is as shown in Table 4:

**Table 4: Impact on MTS Secondary Objectives (economic)** 

	Promote more sustainable transport and travel patterns for all
	users and potential users of the London transport system:
+	The increase in the charge maintains the deterrent effect of the
	Congestion Charge, encouraging the use of other modes of travel
	than the car.
	Increase the economic efficiency and environmental
	sustainability of freight transport and transfer within and
+	around London and the South East: The increased charge will
	help reduce congestion and delays on the road network, which will
	, ,
	benefit those moving freight around Central London.
	Facilitate and contribute to regeneration across all
	communities in London: The proposed changes are not
	expected to have any effect on regeneration.
	Contribute to enhanced productivity and competitiveness
	amongst all businesses within the London area: The proposed
+	increase in the charge would have a small positive effect on
·	productivity though deterring traffic and therefore congestion,
	compared to the 'do nothing' situation.
	To help facilitate and contribute to increased employment and
	earnings especially in low-waged areas: The proposed changes
	are not expected to have any effect on employment and earnings.
	To contribute to the alleviation of poverty and its contributory
	factors: The proposed changes are not expected to have any
	impact on poverty.
	impact on povoity.

# 3.7 Mitigation

No significant negative effects have been identified and therefore no mitigation measures are proposed.

# 4. Monitoring

In line with Proposal 129 of the MTS, the Mayor will keep the Congestion Charging scheme under review, making variations to ensure the continued effectiveness of the policy reflects best practice, improves the operation of the scheme, or helps it to deliver the desired outcomes of the MTS.

The proposed changes set out in the Variation Order will be monitored within this context.