

Road User Charging Adjudicators'

Annual report

2025-26



The Road User Charging Adjudicators form an independent tribunal which decides appeals against the issue of penalty charge notices in London under the various Road User Charging Schemes operated by Transport for London.

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1. Foreword

The independent Road User Charging Adjudicators (RUCA) are pleased to present to the Secretary of State their joint report for the year 2025-2026. The adjudicators are all judicial office holders appointed by the Lord Chancellor following an open competition run by the Judicial Appointments Commission.

A joint report is required by Regulation 8 of the Road User Charging (Enforcement and Adjudication) (London) (Regulations) 2001. This year, the joint report includes information on common misunderstandings encountered in appeals to assist motorists in London to better understand the adjudication process.

This annual report includes a list of RUCA adjudicators who have heard appeals since September 2025. Adjudicators are experienced lawyers, expert in deciding appeals against London road user penalty charges. They are independent and impartial. They are kept up to date with changes to practice and procedure in a monthly newsletter. They also attend a compulsory annual training day every year, which took place on Friday 3 October 2025. Adjudicators received training on issues arising in remote working, on Transport for London's Autopay system, and discussed approaches to current themes arising frequently in appeals.

Adjudicators are noticing an increased use of Artificial Intelligence in appeals. Adjudicators are receiving lengthy and legalistic representations, which refer to irrelevant case law and regulations. Such lengthy representations are often disproportionate to the issues under appeal and the amount of the penalty. On behalf of the Adjudicators, I issued Practice Direction 1 to assist appellants with the appeal process. This requires written representations to be limited to three A4 pages in Arial 12 and to be directly relevant to one or more of the statutory grounds of appeal. The Practice Direction helps appellants to better understand the intention of the appeal process which is designed to be user friendly and for appellants to represent themselves without the need for legal advice.

A positive change to the adjudication processes this year is that Transport for London enabled online appeals to RUCA from 29 June 2026. This is good news for appellants, who are now able to upload representations and evidence direct to the appeal portal. Appellants will be provided with a verification code by Transport for London and may access the Appellant Portal at www.londontribunals.gov.uk. Adjudicators very much welcome this development.

The hearing centre moved to 24 Martin Lane, London EC4R 0DR from 22 October 2025. The hearing centre is easily accessible being close to Cannon Street and London Bridge mainline stations, and Bank and Monument underground stations. Appellants who wish to speak to an adjudicator have the option of attending hearings remotely by telephone or video or attending the hearing centre in person if they prefer. This gives appellants wide access to personal hearings. Appellants may also continue to request postal hearings conducted on the papers only.

The Mayor of London announced changes to the daily Congestion Charge from 2 January 2026, which increased to £18.00.

London Councils under contract to the Greater London Authority (GLA) have continued to provide administrative support for RUCA. We would like to thank all the administrative and IT staff for their support and in particular for their assistance with the hearing centre move and with the facilitation of online appeals.

Alison Spicer
Chief Adjudicator on behalf of RUCA
July 2026

RUCA
London Tribunals

2. Introduction

- 2.1 The Road User Charging Adjudicators are an independent judicial body of experienced lawyers deciding appeals where Transport for London ('TfL') has rejected representations made against the issue of Penalty Charge Notices in London under the Road User Charging Schemes operated by TfL.
- 2.2 Currently these schemes are the Central London Congestion Charging Scheme, the London Low Emission Zone scheme, the London Ultra Low Emission Zone scheme and the Silvertown and Blackwall Tunnels scheme. All schemes adopt the adjudication provisions set out in the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001*, as amended, ('the Enforcement Regulations') and the relevant 'Schedule' to it.
- 2.3 Adjudicators are appointed by the Lord Chancellor.
- 2.4 Adjudicators are supported by administrative staff ('the Service Provider') and have facilities provided for them to enable them to sit and determine appeals. The Greater London Authority ('GLA'), as the authority, are required to make provision for these services and undertake this through appropriate outsourcing.

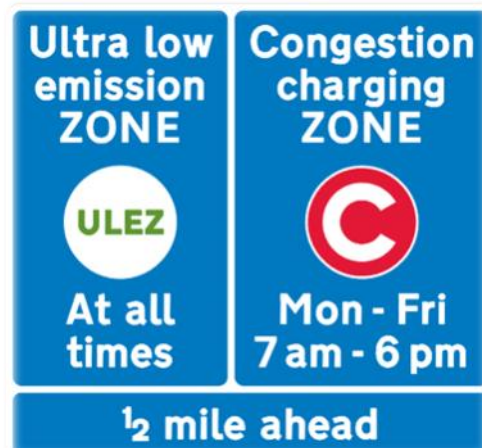


3. Aims and objectives of the Road User Charging Adjudicators

- 3.1 To provide all parties to road user charging appeals with independent, impartial and well-considered decisions based on clear findings of fact and the proper application of law.
- 3.2 To have the appropriate knowledge, skills and integrity to make those decisions.
- 3.3 To ensure that all parties to road user charging appeals are treated equally and fairly.
- 3.4 To enhance the quality and integrity of the road user charging appeals process.

4. The role of the Road User Charging Adjudicators

- 4.1 Adjudicators are appointed in accordance with Regulation 3 of the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, as amended*.
- 4.2 Their role is set out by Regulations 11(2) and 16(2) of the same Regulations which state that an Adjudicator “shall consider the representations in question and any additional representations which are made by the appellant on any of the grounds mentioned in Regulation 10(3) or Regulation 13(3).”.
- 4.3 An Adjudicator’s role does not allow them to consider factors which fall outside of the grounds mentioned in Regulations 10(3) or 13(3), and accordingly may not take into account mitigating factors. These are matters for TfL.
- 4.4 Adjudicators act and determine appeals independently. They are not employees of either the GLA or the Service Provider.
- 4.5 Adjudicators provide all parties in the appeals process with independent, impartial and well-considered decisions based on clear findings of fact and proper application of law.
- 4.6 Adjudicators have and maintain the appropriate knowledge, skills and integrity to make those decisions.
- 4.7 Adjudicators aim to enhance the quality and integrity of the Road User Charging appeal process.



5. Adjudicators who heard appeals in the year 2025-26

Mercy Akman
 Philippa Alderson
 Jane Anderson
 Sara Anzani
 Anthony Baker
 Edward Barnett
 Sukhi Bakhshi
 Heidi Berry
 Deborah Burke
 Cynthia Caiquo
 Joanne Coombe
 Chez Cotton
 George Dodd
 Louise Fisher
 Janet Gittens

Natalie Goffe
 Richard Goss
 Mark Harrison
 Elisa Hopley
 Ravi Khosla
 Gilda Kiai
 Jane Kilgannon
 Kavita Kumar
 Darminder Lehal
 Catherine Loftus
 Morwenna Macro
 Isaac Maka
 Herjinder Mann
 Laura Marshall
 Gregor McGill

Lola Moses
 Hayley Needham
 Simon Newman
 Michael Range
 Anita Reece
 Sahil Sinha
 Timothy Smith
 Amarjit Kaur Soor
 Alison Spicer
 Richard Thompson
 Frances Thornton-Dale
 Alexandra Tucker
 Graeme Wallington



6. Common misunderstandings of the appeal process (compiled by Lola Moses, Adjudicator)

Key Point: Road User Charging Adjudicators determine whether a statutory ground of appeal has been established. They **do not** exercise the discretionary powers available to Transport for London.

Every appeal is determined on its own facts and evidence. Over time, however, certain recurring themes emerge from the cases considered by adjudicators.

The following examples reflect some of the most common misunderstandings encountered in road user charging appeals.

1: "The adjudicator can cancel the PCN because my circumstances are exceptional."

Appeals frequently involve illness, bereavement, financial hardship, caring responsibilities, mental health difficulties or other challenging circumstances. Whilst Transport for London may take such matters into account when exercising its discretion, an adjudicator can only allow an appeal if one of the statutory grounds of appeal is established.

2: "I was not the driver."

Many appellants explain that they were not driving the vehicle at the time of the contravention and therefore believe they should not be liable for the penalty charge. However, liability under the road user charging schemes rests with the registered keeper rather than the driver.

3: "The vehicle was hired out."

Vehicle owners sometimes assume that liability automatically transfers to the hirer whenever a vehicle has been rented to another person. However, liability only transfers where the registered keeper operates a hire business and the statutory requirements governing hire agreements are satisfied.

4: "I didn't know a charge applied to my journey."

Some appellants explain that they were unaware that a charge applied to a particular journey. This may arise because a charging scheme has been introduced, expanded or amended, because they were unfamiliar with the area, or because they did not realise their vehicle was subject to the charge. However, liability under the road user charging schemes does not depend upon a motorist's awareness of the charging arrangements. A lack of knowledge may explain why the contravention occurred, but it does not establish a ground of appeal.

6. Common misunderstandings of the appeal process (cont'd)

5: "I tried to pay."

Many appeals involve motorists who intended to pay but, for one reason or another, payment was not successfully completed. Examples include selecting an incorrect date, entering the wrong vehicle registration mark, misunderstanding the payment process, assuming payment had been made, or encountering difficulties whilst attempting to make payment online. The relevant question is whether payment was successfully made to and received by Transport for London in accordance with the requirements of the scheme.

6: "My vehicle was registered for Auto Pay."

Many appellants explain that they believed their vehicle was covered by Auto Pay because they had a basic TfL road user charging account or had previously used Auto Pay successfully. Adjudicators frequently encounter appeals where a vehicle was added to a basic TfL account but not to the Auto Pay service, or where the account holder was unaware that their Auto Pay account had been closed because of payment issues. In many cases these are genuine mistakes and there is no suggestion that the motorist intended to avoid payment. However, it remains the responsibility of the registered keeper to ensure that any vehicle is correctly registered, that their payment details are kept up to date, and that the required charges are paid.

7: "The adjudicator can reduce the penalty charge."

Many appellants accept that a contravention occurred but ask the adjudicator to reduce the penalty charge, restore the discounted amount or accept payment of the original road user daily charge. Transport for London is under a duty to accept the discounted amount only if payment is made within 14 days of service of the original penalty charge notice. At all other times, whether to accept the discounted amount is a matter for Transport for London's sole discretion.

8: "My Statutory Declaration has cancelled the Penalty Charge Notice."

Some appellants assume that once a Statutory Declaration has been filed at the Traffic Enforcement Centre and a revoking order has been made, the Penalty Charge Notice has been cancelled or that no further action can be taken. The revoking order made by the County Court revokes the Charge Certificate only. The underlying Penalty Charge Notice is not cancelled and enforcement may continue. Transport for London forwards these cases to the adjudicator for consideration. If the matter proceeds to an appeal, the appellant must demonstrate that one of the statutory grounds of appeal is made out.

7. Useful information

The structure of the Road User Charging Adjudicators Tribunal

What is 'RUCAT'?

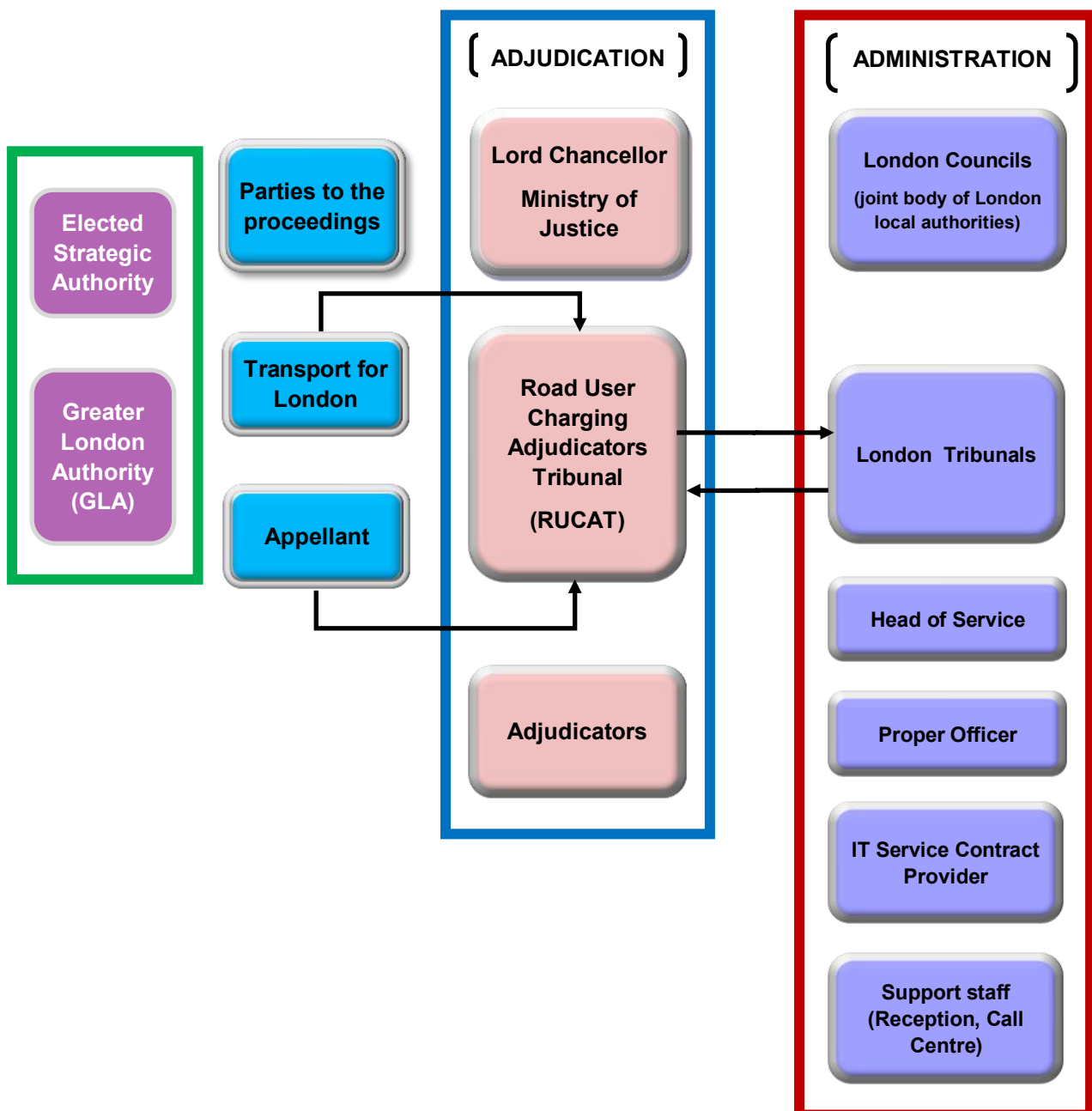
RUCAT is the 'Road User Charging Adjudicators Tribunal'. It is an independent tribunal which decides appeals against the issue of penalty charge notices in London under the Road User Charging Schemes operated by TfL.

Who are London Tribunals?

London Tribunals is the name used by London Councils ('the Service Provider') to provide administrative support to the Road User Charging Adjudicators.

This administrative support is provided by London Councils under contract to the Greater London Authority.

The following diagram explains the structure of RUCAT and London Tribunals:



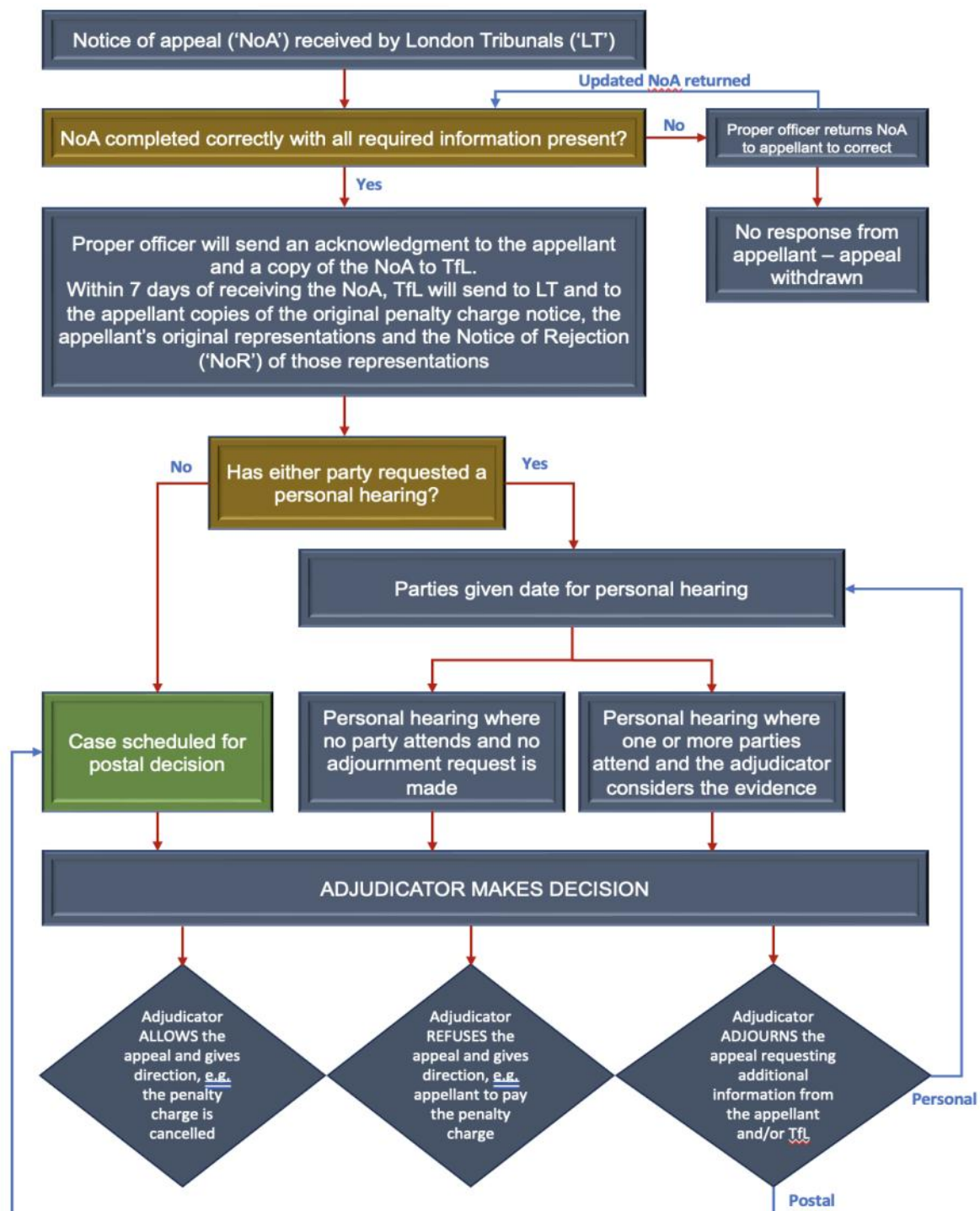
The appeal process

If Transport for London ('TfL') serves a Penalty Charge Notice ('PCN') arising from an alleged road user charging contravention, the registered keeper of the vehicle is entitled to contest the penalty charge by making written representations to TfL.

If TfL accepts those representations, then the PCN will be cancelled.

If TfL rejects the representations, the registered keeper of the vehicle, or their authorised representative, may appeal to the Road User Charging Adjudicator. The appeal is against TfL's decision to reject the written representations.

The following diagram explains the process of an appeal once it is received by London Tribunals.



Grounds of appeal

Initially the responsibility is on Transport for London ('TfL') to demonstrate that a contravention has occurred.

This means that TfL must produce evidence that:

- 1) A relevant vehicle;
- 2) was used or kept within the congestion charge area, low emission zone or ultra low emission zone, Silvertown or Blackwall Tunnels;
- 3) during the designated hours of a particular date; and
- 4) that the appellant is the registered keeper of the vehicle; and
- 5) that the correct payment was not received by TfL.

If TfL produces this evidence, the onus will shift to the appellant to satisfy the Adjudicator that, on the balance of probabilities, one or more of the six statutory grounds of appeal applies.

These grounds are:

- a) that the recipient - (i) never was the registered keeper in relation to the vehicle in question; or (ii) had ceased to be the person liable before the date on which the vehicle was used or kept on a road in a charging area; or (iii) became the person liable after that date.
- b) that the charge payable for the use or keeping of the vehicle on a road on the occasion in question was paid at the time and in the manner required by the charging scheme.
- c) that no penalty charge is payable under the charging scheme.
- d) that the vehicle had been used or kept, or permitted to be used or kept on a road by a person who was in control of the vehicle without the consent of the registered keeper.
- e) that the penalty charge exceeded the amount applicable in the circumstances of the case.
- f) that the recipient is a vehicle hire-firm and; (i) the vehicle in question was at the material time hired from that firm under a hiring agreement; and (ii) the person hiring it had signed a statement of liability acknowledging his liability in respect of any penalty charge notice imposed in relation to the vehicle during the currency of the hiring agreement.

The adjudicator CANNOT consider mitigating factors, as confirmed by the Court of Appeal in [Walmsley v TfL and Others \[2005\] EWCA Civ 1540](#).

Previous annual reports and key issues addressed

(click on cover image to view)



2003-04

- Hire Agreements
- Pay and appeal
- Discretion and mitigation

2004-05

- Review of an adjudicator's decision
- Photographic evidence in appeals
- Judicial Review on adjudicator's ability to consider mitigation





2005-06

- Explanation of the grounds of appeal
- Service of a penalty charge notice
- The Low Emission Zone

2006-07

- Challenge to the validity of a penalty charge notice
- Recording of Call Centre conversations
- The Low Emission Zone





2007-08

- Emissions related congestion charging
- Judicial Review regarding Article 6 of the ECHR
- Increases in penalty charge amounts

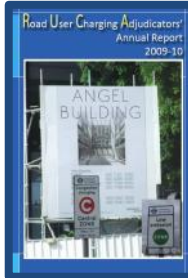
2008-09

- Evidence produced by a prescribed device
- Obtaining transcripts of hearings
- Road User Charging Adjudicators' Tribunal - On the Move



Previous annual reports and key issues addressed (cont'd)

(click on cover image to view)



2009-10

- Appeals process
- Matters of interest in previous reports (summary)
- Appeals statistics

2010-11

- Congestion charge auto pay
- Alternative fuel discount
- Low Emission Zone 2012

Road User Charging Adjudicators' Annual Report 2010-2011

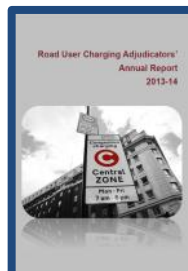


2011-12

- Greener vehicle discount scheme
- Fleet autopay
- Ignorance of the congestion charging zone

2012-13

- Interesting facts about the congestion charging scheme
- Ten years of adjudicator recommendations
- Standard of proof

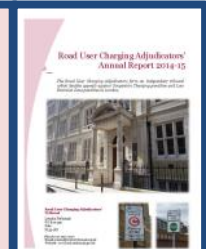


2013-14

- The Ultra-Low Emission Zone
- Multiple statutory declarations
- Driving for a short time in the congestion charge zone

2014-15

- Data protection
- The new hearing centre at Chancery Exchange
- History of Legal London



Previous annual reports and key issues addressed (cont'd)

(click on cover image to view)



2015-16

- Electronic signatures
- Appellants who fail to appear at a personal appeal
- The Personal Support Unit

2016-17

- The Emissions Surcharge
- The Emissions Surcharge - possible issues for the Tribunal





2017-18

- Hire agreements
- Recommendation regarding advertising the Ultra-Low Emissions Charging Scheme

2018-19

- Ultra-Low Emission Zone
- Unauthorised web sites
- The work of the duty adjudicator





2019-20

- Temporary changes to the Congestion Charging Scheme (Covid)
- JR - re. removal of exemption from congestion charge for licenced private hire drivers

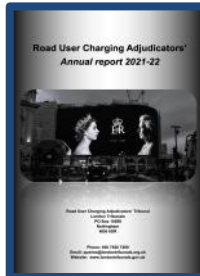
2020-21

- Role of the proper officer
- Diary of a newly appointed adjudicator
- Central London hearing centre during lockdown



Previous annual reports and key issues addressed (cont'd)

(click on cover image to view)



2021-22

- Ingrid Persadsingh (former chief adjudicator) - an appreciation
- Appeal statistics

2022-23

- A day in the life of an adjudicator
- Updated Ultra-Low Emissions Zone map, from 29 August 2023



2023-24

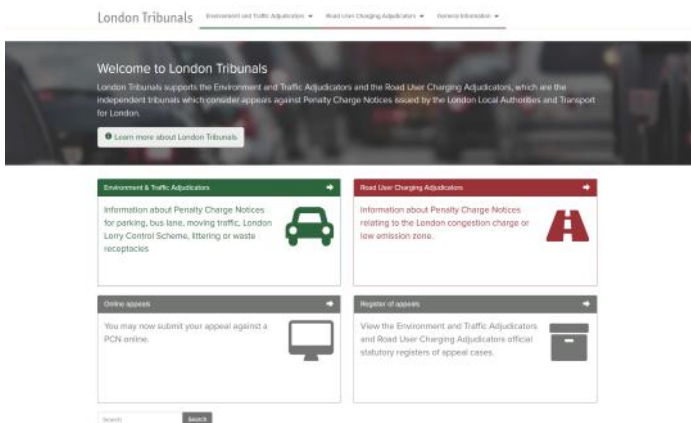
- 21 years of the Road User Charging Adjudicators' Tribunal
- Ultra-Low Emissions Zone signage
- Early reflections from a (newly appointed) adjudicator

2024-25

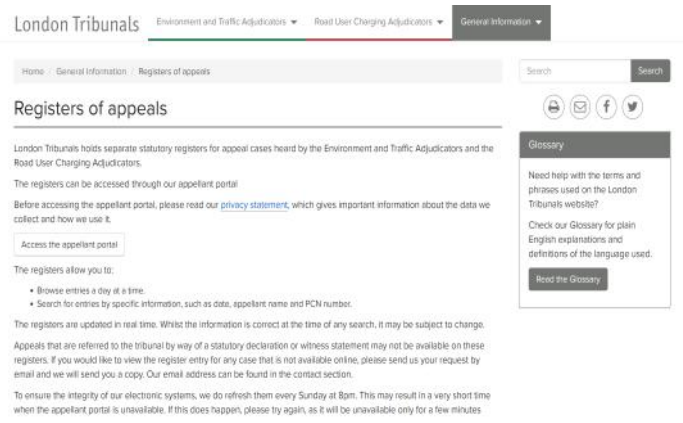
- Reflections on the Tribunal's transition to remote hearings
- Silvertown & Blackwall Tunnel User Penalty Notice Charges
- Appearance of lay representatives on behalf of appellants



London Tribunals' website



Statutory register



London Tribunals maintains a website (www.londontribunals.gov.uk) with the aim of providing information, guidance and assistance to anyone intending to appeal to the tribunal.

The daily lists of each day's cases before the tribunal can be viewed, as well as maps and travel advice on getting to the hearing centre.

The website offers a useful guide to each stage of the enforcement process, explaining the options available to the appellant at each stage.

The Statutory Register (see right) can also be accessed through this website.

This is the official register of cases at the Road User Charging Tribunal, kept under Section 21 of the Schedule to the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001 (as amended)*.

It is a register of appeals and the decisions made on them.

The Register can be viewed online at www.londontribunals.gov.uk/ and can be browsed for one day of appeals at a time, or a more specific search (looking, for instance, at the appellant's name) can be made.

The Register can also be examined at the Hearing Centre.

Hearing Centre 24 Martin Lane, EC4R 0DR

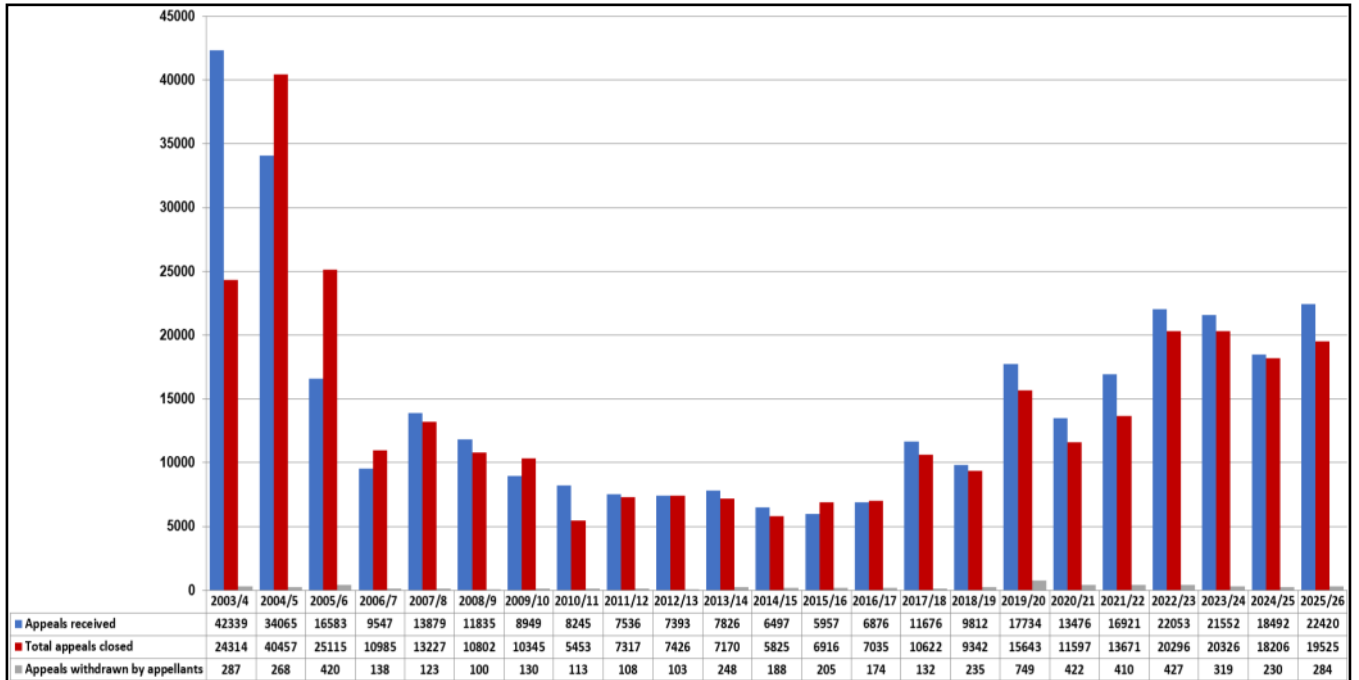


Hearing Centre location

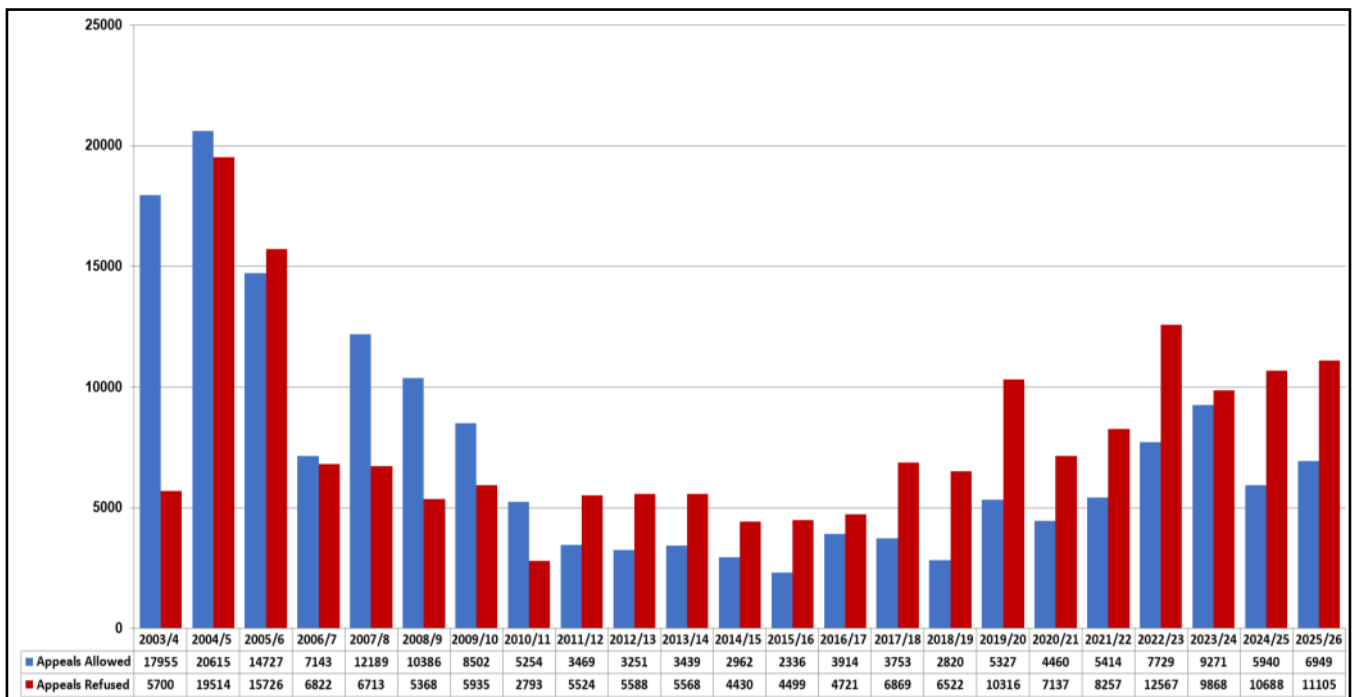


Appendix 1 — Appeals 2003 to 2026

Appeals received and cases closed 2003-2026

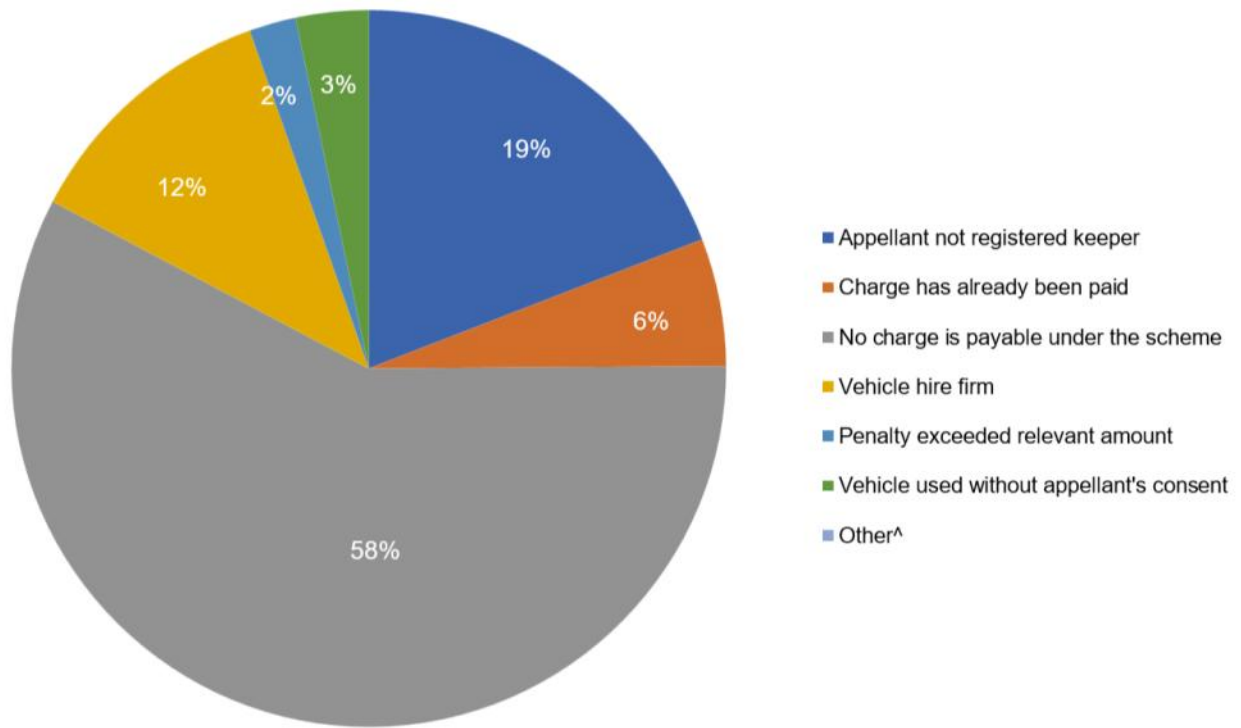


Appeals allowed and refused 2003-2026

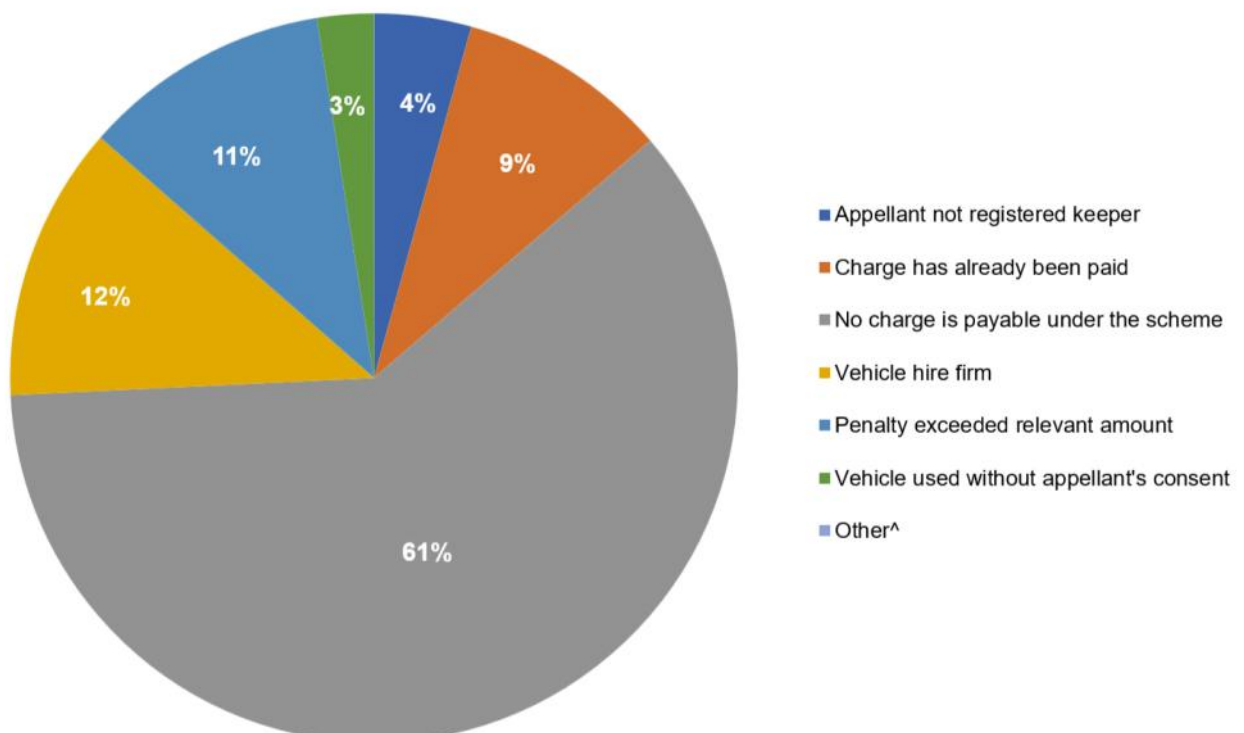


Appendix 2 - Appeal decisions (by ground) 2025/26

Summary of decisions by ground of appeal (allowed)



Summary of decisions by ground of appeal (refused)



Appendix 3 - Last 5 years' Road User Charging statistics 2021-26

(see previous reports for figures prior to 2021)

Appeals	2021/22	2022/23	2023/24	2024/25	2025/26
Appeals received	16921	22053	21552	18492	22420
Total appeals closed	13671	20296	20326	18206	19525
Appeals withdrawn by appellants	410	427	319	230	284
Appeals not contested by TfL	4093	5713	6629	4487	5447
Appeals refused postal**	6388	10798	8391	8836	8969
Appeals allowed postal*	4088	6237	7458	4495	5270
Appeals refused personal**	1869	1769	1477	1852	2136
Appeals allowed personal*	1326	1492	1813	1445	1679
Closed administratively	0	0	0	0	0
Statutory declarations issued #			1187	1578	1471
Appeals adjourned	209	858	643	385	42
Review decisions	249	571	608	1013	917
Costs decisions	85	41	35	131	59
Postal appeals ready for adjudication at end of year	1398	1327	845	739	1981
Personal hearings scheduled	1427	1297	1229	1339	1781
% withdrawn by appellants	3.00%	2.10%	1.67%	1.38%	1.57%
% not contested by TfL	29.94%	28.15%	34.64%	26.98%	30.17%
% refused postal**	46.73%	53.20%	43.84%	53.14%	49.68%
% allowed postal*	29.90%	30.73%	38.97%	27.03%	29.19%
% refused personal**	13.67%	8.72%	7.72%	11.14%	11.83%
% allowed personal*	9.70%	7.35%	9.47%	8.69%	9.30%
% closed administratively	0.00%	0.00%	0.00%	0.00%	0.00%
% of cases allowed	39.60%	38.08%	48.44%	35.72%	38.49%
Average postal hearing (mins)	14.79	10.89	10.24	12.17	12.59
Average personal hearing (mins)	12.37	9.95	9.93	11.88	11.51
% of cases 1st considered within 56 days	76.24%	61.19%	88.31%	99.29%	80.84%
Average days delay	49	76	41	40	42
% hearings within 15 mins ##	n/a~	100%	100%	100%	100%
Summary of decisions by ground of appeal (allowed)	2021/22	2022/23	2023/24	2024/25	2025/26
Appellant not registered keeper	759	1370	1183	1035	1330
Charge has already been paid	265	307	526	328	400
No charge is payable under the scheme	2876	4304	6017	3306	4018
Vehicle hire firm	1109	1077	889	548	825
Penalty exceeded relevant amount	238	373	442	185	147
Vehicle used without appellant's consent	105	283	199	229	229
Other^	62	15	15	309	0
Summary of decisions by ground of appeal (refused)	2021/22	2022/23	2023/24	2024/25	2025/26
Appellant not registered keeper	165	580	440	474	479
Charge has already been paid	442	971	1129	1206	1045
No charge is payable under the scheme	4762	7719	5656	6413	6721
Vehicle hire firm	1873	1490	1291	1418	1356
Penalty exceeded relevant amount	909	1376	918	925	1225
Vehicle used without appellant's consent	99	306	310	252	277
Other^	7	125	124	0	2

* including DNCs

** including Withdrawals

^ Cases where the ground of appeal is not recorded

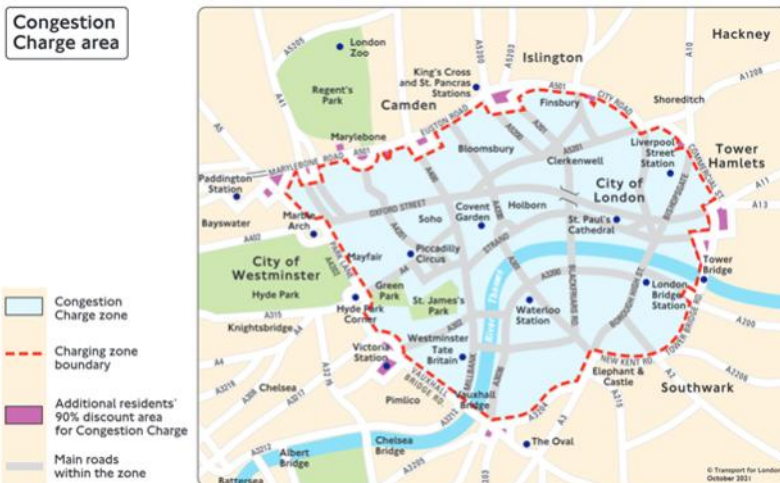
~ Not recorded this year as adjudicators have been conducting telephone hearings

not reported on prior to 2023-24

face to face hearings only from 2023-24

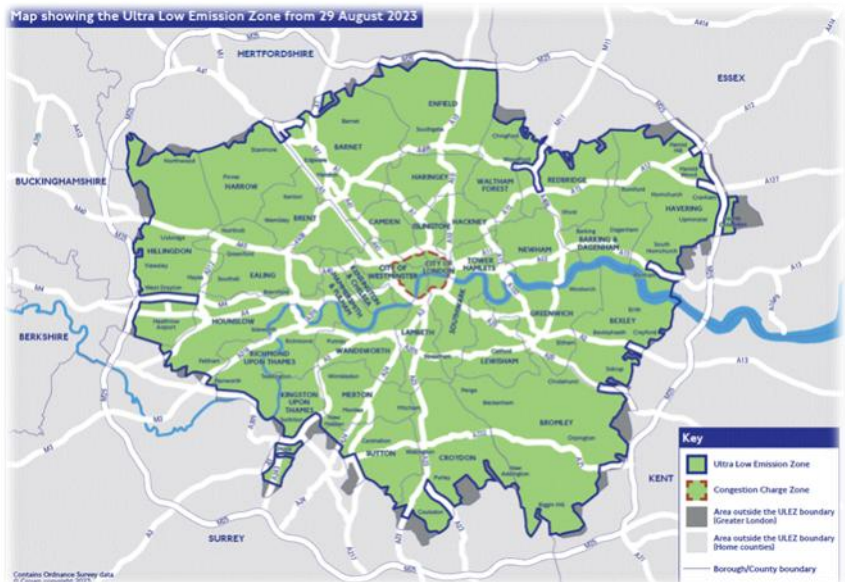
Appendix 4 - Zone maps

Congestion Charge area



Congestion charge

Ultra-Low Emission



Silvertown Tunnel



Road User Charging Adjudicators (RUCA)
London Tribunals
PO Box 460, Hartlepool, TS24 4JE
Telephone: +44-(0) 207 520 7200
e-mail: queries@londontribunals.org.uk
Website: <http://londontribunals.gov.uk/>

Hearing Centre location:
24 Martin Lane
London
EC4R 0DR

Useful addresses

Judicial Conduct Investigations Office
81-82 Queen's Building, Royal Courts of Justice, WC2A 2LL
E-mail: general.enquiries@judicialconduct.gov.uk
Website: <https://www.complaints.judicialconduct.gov.uk/>

Office of the Judicial Appointments and Conduct Ombudsman
1st Floor, The Tower, 102 Petty France, London, SW1H 9AJ
Website: <http://www.justice.gov.uk/about/jaco.htm>