



The Alliance of British Drivers

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Dartford Crossings Consultation
Highways Agency

Via Email: DartfordCSOConsultation@highways.gsi.gov.uk

29 December 2012

Response to Consultation on Free-Flow Charging Options at the Dartford Crossing

Dear Sirs,

We are hereby responding to the above consultation. Our detailed responses to your defined consultation questions are in the attached form, but our more general comments are given below (numbered as per paragraphs in the consultation document):

Para 1.3.3. The simplest way to improve traffic flows is to remove the tolls.

It says the proposed system would improve traffic flow by enabling the removal of the toll barriers, but so would a simple removal of the toll barriers. We reject the need for any tolls whatsoever at the Dartford Crossing bearing in mind that the bridge and tunnel has already been paid for by past tolls collected from users. These tolls are simply a means for the Government to collect more taxes when it already raises many times more from taxes on road users than are spent on the roads.

Para 1.3.4. Lack of proper consultation on using free-flow charging.

This paragraph says, "This consultation is based on the assumption that a 'free-flow' charging arrangement would be introduced at the Dartford Crossing, based on Government commitments". This ignores the need to consult with the public and affected parties on the whole concept of free-flowing charging, and your specific consultation questions ignore any such questions. This is undemocratic in the extreme. We wish to say now that the ABD is not only opposed to all forms of road charging and road tolls, but we also oppose its embodiment in free-flow charging as proposed in the consultation document.

The proposed scheme is exactly the same as used for the London Congestion Tax which is very expensive to operate, inconvenient for users to pay and creates enormous numbers of penalty charges (it could be as many as 15,000 per day or over 5 million per year at the Dartford Crossing based on data in the consultation document).

Para 2.1. Inadequate justification for a toll.

This paragraph suggests that charges need to be collected “in order to continue to manage demand for the use of the Crossing and reduce impacts caused by the levels of congestion”. We do not acknowledge that there is any justification for a toll on this road. The charge was introduced simply as a means of collecting taxation, and a promise by a former Government that the toll would be dropped as soon as the bridge had been paid for has been reneged upon. Indeed it has been spelled out repeatedly in past Government documents that the toll was necessary in order to finance other river crossings. The suggestion that it was required to manage “congestion” is obviously nonsense as collection of the toll has actually caused and exacerbated congestion and it is likely that there would be no congestion if the tolls were removed.

This paragraph also suggests that the revenue generated would fund “additional crossing capacity in the Lower Thames area” but the additional proposals for tunnels, bridges and ferries between the Dartford Crossing and central London, which is the subject of a separate concurrent consultation, suggest that these crossings need to be financed by tolls on them. It would appear that there is no consistency between the documents issued by the Highways Agency and Transport for London (TfL) and either one or the other is being grossly misleading concerning use of the revenues from these tolls.

In any case the proposed arrangements will generate net revenue of up to £300m per annum (see below), whereas even the proposed Silvertown Tunnel is only costed at £600m. So in two years that would be paid for. The existing QEII bridge only cost £150m in 1990 (including approach works). It is clear that the proposed scheme and the charges to be imposed are wildly in excess of anything required to pay for new river crossings.

There has obviously been repeated duplicity by the current and previous Governments about the need for, and use of the revenue generated by tolls on the Dartford Crossing.

Para 2.3. Poor compliance rates will result.

We do not dispute that the free-flow charging scheme as envisaged would require enforcement measures. But as it states in this paragraph, comparable schemes have compliance rates of between 80 and 90 percent. This is hardly acceptable and shows how poor the compliance actually is on such schemes.

Para 3.3. Financial analysis is grossly misleading.

The summary financial figures given in this paragraph are grossly misleading. The calculation is based on the presumption that the raising of taxation is a benefit, when in reality it is a cost on the road users. It is simply nonsensical to claim that because the Government can raise cash from the population by imposing a tax (which in essence what this toll is) that this should be considered a net benefit. Indeed the financial analysis given in Appendix C is a masterpiece of obfuscation.

The following is a sounder analysis:

A – The daily two way traffic volumes are currently 141,000 vehicles per day (see page 4 of Appendix C of the consultation document). Assuming some increase from the reduction of congestion and general growth in traffic levels over the next ten years, let us conservatively estimate the average volume over the next ten years as 150,000 vehicles per day. Assuming that 75% of those paid the standard fee of £2.50 per vehicle (ignoring additional charges for larger vehicles and discounts for local residents) and 25% pay £1.67 by using Dart-Tag (currently only 23% but the incentive to use it will increase) and ignoring the impact of charges being raised in line with the RPI, that implies a revenue figure of approximately £314,000 per day, or £114m per annum.

In addition there are penalty charges at £35 per infringement, or lack of “compliance” (and based on the data provided, a conservative estimate is of 10% failing to pay and incurring such a charge). Although not all those will be collected, those that are not are offset by the higher penalties for late payment. The net revenue may be as high as £450,000 per day, or £164m per annum. As with the London Congestion Charge, the impact of fines for omitting to pay makes a massive difference to the economics of the scheme. So the total revenue is £278m per annum.

In other words, over a 25 year period the revenue is likely to be of the order of £7 billion.

In reality that ignores the additional revenue from “next-day” payment and the additional charges paid by larger vehicles (although that is offset to some extent by the fact that the latter tend to have a higher take up rate for use of Dart-Tag discounted rates).

B – The costs of introduction of “free-flow” charging are given as £434m over a 25 year period (Para 3.3 and page 2 of Appendix C), but that includes “User Charges” of £65.4m (which appears to only represent the “additional users” and “Greenhouse Gases” of £7.2m. The former is not a cost of operating the system and the latter is exceedingly questionable but there is little detail in the consultation documents on how these were calculated. It is a reasonable assumption that the net cost is therefore more like £360m in installation and operating costs over 25 years.

C – So in total the net direct increase in revenue to the Government from this proposal over 25 years is at least £6.5 billion, and probably higher.

Unfortunately not enough information is provided in the consultation document to enable calculation of a more exact figure.

D – As justification, and to explain how they claim an overall “benefit”, the consultation document suggests a net benefit over 25 years of £1,683m for “journey time reductions”, £39m for “journey time reliability”, £5m for accidents and incident related delay reductions and £35m in vehicle operating costs – see page 26 of Appendix C. This totals £1,762m (ignoring the “additional” user charges they have erroneously added in there as a “benefit”).

In reality they are claiming a net benefit of £1,328m (i.e. £1.3bn approximately) over 25 years (£1,762m minus £434m), primarily on the basis of journey time reductions.

But to obtain those journey time reductions and other benefits, the road users have to pay £6.5bn to obtain those £1.3bn in benefits, i.e. a net cost to the road users of £5.2bn!

This makes no sense when simply removing the tolls would produce all the benefits (£1.6bn) at minimal cost.

E – The inconvenience of a payment system. In addition, there is a further major omission in the financial analysis by the Highways Agency. There is no inclusion of the time and expense incurred by those who pay the charge. Anyone who has used the London Congestion Charge system on an occasional basis (and many users of the Dartford Crossing are infrequent users) will realise that it takes some minutes to do so. Indeed it is a major inconvenience and typically imposes a considerable burden on road users.

Summary of objections

Our main objection to this proposal is that the financial justification for the introduction of this scheme is grossly defective. In addition the consultation document omits much of the detail information required to understand the true costs, and generally distorts the analysis. By so doing it misleads the readers.

It is clear that the reason for this proposal is simply to obtain more tax revenue for the Government and that there is no net benefit to the road users or the general public. Indeed major benefits would be obtained simply by scrapping the tolls.

Please note our comments above.

Yours sincerely

Roger Lawson
London Co-Ordinator

About The Alliance of British Drivers (ABD)

The Alliance of British Drivers was formed from a merger between the Association of British Drivers and the Drivers Alliance. The ABD is the leading independent organisation which represents the interests of private motorists in the United Kingdom. We campaign to protect the rights of individual road users and believe that road transport is a beneficial and essential element in the UK transport infrastructure. We oppose excessive taxation of motorists and are against tolls and road usage charging. We also campaign for more enlightened road safety policies. The Alliance is a “not for profit” voluntary organisation which is financially supported primarily by its individual members. More information on the ABD is available from our web site at www.freedomfordrivers.org

CONSULTATION RESPONSE FORM

PART 1 - Information about you

Name	Roger Lawson
Address	PO Box 62, Chislehurst
Postcode	BR7 5YB
Email	
Company Name or Organisation (if applicable)	Alliance of British Drivers (ABD) – formerly the Association of British Drivers
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members: We have approximately 1,000 subscribing members plus another 2,000 non-paying members and other supporters. We circulated our members with some information on the proposals and asked for comments and this response was also circulated among our 25 executive committee members in draft form.</p>	

If you would like your response or personal details to be treated **confidentially** please explain why:

We do not wish for any confidentiality

PART 2 - Your Comments

Q1. Do you agree with the proposal to introduce post-pay periods that would allow road users to pay the Dartford Crossing road user charge following use of the Crossing and prior to being subject to enforcement?	Agree <input type="checkbox"/>	Disagree X
Please add any comments. We oppose any form of pre or post payment whatsoever.		

Q2. Do you agree with the proposal to introduce provisions to enforce the road user charge at the Dartford Crossing upon the introduction of a 'free-flow' charging arrangement?	Agree <input type="checkbox"/>	Disagree X
Please add any comments. We oppose any form of charging whatsoever for the Dartford Crossing and hence there should be no provisions for enforcement. See our comments in our covering letter.		

<p>Q3. Do you agree that the levels of penalty charge should be lower than the maximum permissible under the proposed new enabling Enforcement Regulations?</p>	<p>Agree X</p>	<p>Disagree <input type="checkbox"/></p>
<p>Please add any comments.</p> <p>No comments.</p>		

<p>Q4. Do you agree with the proposal to set the same penalty charge rate for all vehicles?</p>	<p>Agree X</p>	<p>Disagree <input type="checkbox"/></p>
<p>Please add any comments</p> <p>No comments.</p>		

<p>Q5. Do you agree with the proposal that the original road user charge would be payable in addition to the penalty charge at each level?</p>	<p>Agree <input type="checkbox"/></p>	<p>Disagree X</p>
<p>Please add any comments.</p> <p>No comments.</p>		

<p>Q6. Do you agree with the proposal to include a statutory requirement to publish the penalty charge rates on a public website?</p>	<p>Agree</p> <p>X</p>	<p>Disagree</p> <p><input type="checkbox"/></p>
<p>Please add any comments.</p> <p>No comments.</p>		

<p>Q7. Do you have any other comments on the draft Charging Scheme Order (Appendix A – Draft Charging Scheme Order)?</p>	<p>Agree</p> <p><input type="checkbox"/></p>	<p>Disagree</p> <p><input type="checkbox"/></p>
<p>Please add any comments.</p>		

<p>Q8. Do you agree or disagree with our assessment (Appendix C – Impact Assessment) of the impacts of the proposals, particularly on small firms and protected equality groups?</p>	<p>Agree</p> <p><input type="checkbox"/></p>	<p>Disagree</p> <p>X</p>
<p>Please add any comments.</p> <p>This document is grossly misleading and untrue. It says the “road user charge” (i.e. the toll) for the Dartford River Crossing was introduced as a way of managing the high demand for its use. This is simply nonsense. The charge was introduced simply as a means of collecting taxation. Indeed it has been spelled out repeatedly in past Government documents that the toll was necessary in other to finance other river crossings. The suggestion that it was required to manage “congestion” is obviously nonsense as collection of the toll has actually caused and exacerbated congestion and it is likely that there would be no congestion if the tolls were removed.</p>		