



The Association of British Drivers

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Congestion Charging Consultation
Transport for London
Chiswick Gate
598 - 608 Chiswick High Road
London
W4 5RT

Via Email to: CChargeConsultation@tfl.gov.uk

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Statutory Consultation on the Removal of the Western Extension of the London Congestion Charge and Other Changes to the Scheme.

Dear Sirs,

Our comments on the above proposals are as follows:

1. Removal of the Western Extension

The Western Extension of the London Congestion Charge Zone was introduced in February 2007 despite overwhelming public opposition in the previous public consultation exercise. To remind you, in one of the largest consultation exercises ever undertaken in London, the following were the preferences of those who submitted comments:

Responses	Stakeholders and other Organisations	Members of the Public	Businesses
Support	27	23,226	3,465
Oppose	98	52,512	13,380
Neutral	32	7,542	1,732
Totals	157	83,280	18,577

In other words, almost 70% of members of the public who expressed an opinion were opposed to it.

There have been two subsequent consultations on removal of the western extension (if you include the one in the consultation on the Mayor's Transport Strategy) and they both show overwhelming support by the general public for the removal of the western extension. For example, on the first one, some 28,000 people and organisations responded to the Mayor's consultation on Removal of the Western Extension of the Congestion Charge. Sixty-nine per cent voted to scrap it, with only nineteen per cent supporting retention, and twelve per cent supporting changes to the scheme. Note that 86% of businesses wanted it scrapped.

Let us hope that this statutory consultation is the final one and that Londoners do not have to respond further on this matter as their views are obviously quite conclusive.

For the avoidance of doubt however, let me state that this organisation fully supports removal of the Western Extension of the Congestion Charge for the reasons given below.

Congestion Charging Shown to be a Failure

In our view publications by Transport for London (TfL) show the truth of congestion charging. The more recent Annual Monitoring Reports from TfL show that this unnecessary and unreasonable tax has not resulted in any benefit in terms of congestion on the roads of London. Indeed although they claim traffic levels are down, they had to admit that "*congestion rises back to pre-charging levels*".

They suggest that much of this can be accounted for by road works, and in particular in the Western Extension by a major redevelopment at the Scotch House Corner junction, but the ABD suggests that this is nonsense. Road works are a continuing fact of life to road users in London and have been for many years – indeed there were complaints in the year before the Congestion Charge was introduced that the large number of road works at that time would distort analysis of any improvements in traffic flows in the following years.

In reality the Congestion Charge (which should be called a Congestion Tax because that is what it is) was never likely to have a major impact on traffic volumes, and all that has happened is that a few fast moving private vehicles have been replaced by slow moving buses and taxis, which obstruct other traffic. That is the main reason why Congestion Charging has not worked.

Western Extension Even More Obviously a Failure

One TfL report also says "*Recent results have returned congestion values that are similar to pre-extension levels, indicating that the western extension is currently experiencing no material congestion relief*". Instead of it taking 5 years to demonstrate how ineffective congestion pricing schemes are as with the central zone, this was shown within one year in the western extension. Even bus speeds and reliability within the Western Extension have stayed the same or got worse.

Mr Livingstone claimed the western extension would reduce congestion by 10-20% in his original press release (see the full text at: <http://www.tfl.gov.uk/corporate/media/newscentre/archive/4375.aspx>) .

So the prime objective of this very expensive scheme has not been met.

No Environmental Benefits

In addition one TfL report says "*no clear scheme impacts from either the original central or western extension zones can therefore be discerned*" in ambient outdoor air quality. Of course this is not surprising as there was never any expectation of a significant impact on air quality from the original or extension congestion charge schemes.

Grossly Misleading Comments from TfL

Unfortunately documents emanating from Transport for London (TfL) grossly mislead the public about the success of the scheme.

For example one consultation leaflet from TfL said "*It is clear that without the Western Extension in place, congestion would be worse*". The ABD says there is simply no evidence to support this statement and we believe it is in essence a fiction.

There are of course many parts of London where no congestion charge scheme has ruled for the last few years. Have they suffered gridlock? No. Have they experienced increased traffic volumes and hence increased congestion? No. Those parts of London that are far enough away from the congestion charge zone to suffer no impact from diverting traffic have seen no increase in congestion. Indeed in some boroughs, although car ownership has gone up, traffic counts have actually fallen.

The latest consultation leaflet continues to mislead the public, in the following ways:

a – It says that "*congestion has increased again (although it would have been worse in the absence of Congestion Charging)*" and says this is due to "*significant development and road works*". There is simply no evidence to support this statement. Road works have not changed much in numbers over the years. In reality congestion is self-regulating so any temporary reduction in traffic by imposing taxes on vehicles is soon offset as less congestion generates more traffic because there is enormous unsatisfied demand for road space.

b – It says that "*the scheme has helped to reduce emissions of climate change gases and environmental pollutants*". No evidence has ever been produced by TfL of any actual benefits in emissions based on actual measurements within the congestion charge zone. They rely on estimates by TfL that are based on false premises. Our analysis of real data shows no measurable or significant benefits. Indeed the latest consultation leaflet actually says "*reductions in the emission of air pollutants have been comparatively small and have not resulted in direct measurable improvements in air quality.....*".

C – It suggests that the western extension has “raised net revenues”. Again a very questionable statement when the actual financial figures are examined. The net revenue from the scheme is in practice probably minimal (and nowhere near the £55m claimed in the latest consultation leaflet) if all costs are taken into account, and it imposes significant and excessive financial burdens on those who have to pay the tax. How this figure of £55m was calculated is not apparent, but the last, 2008, Sixth Annual (impacts monitoring) Report explicitly noted it wasn't possible to discern the proportion of income and costs relating to a sub-area (ch 10.16, p219). There has of course been no report published for 2009, and we question why not.

Poor Economics

Apart from the ineffectiveness of the Western Extension in meeting its stated objective of reducing congestion, the congestion charge scheme generally is also very ineffective at raising money to fund public transport schemes. The surplus of revenue over expenditure from the congestion charge is relatively small with the majority of income being spent on operating the scheme. In reality it's one of the most inefficient ways of raising public funds (i.e. taxes) ever devised. More analysis of the economics of the system based is given in the articles on this page of our web site: www.freedomfordrivers.org/Congestion.htm

Summary on Western Extension Removal

In summary, the main defect of the scheme is that it has not reduced congestion, and neither does it raise money to subsidise public transport in an effective manner. Therefore there is only one conclusion that can be drawn – namely that the Western Extension should be scrapped as soon as possible and alternative measures examined to tackle the problems of traffic congestion.

Proposed Increase in Congestion Charge to £10

We would of course like to see the whole of the Congestion Charge Scheme removed on the basis that is an expensive tax and ineffective in its originally stated objective of reducing congestion. We definitely oppose any increase in the charge to £10 when it was originally sold to the public on the basis that it would be only £5. Increasing the charge, will not make it more effective, but will simply make it less affordable for those less wealthy members of the community.

Auto Pay Scheme

However, we support the introduction of the proposed “Auto Pay” scheme as it is clearly inequitable that a substantial proportion of the revenue raised from the Congestion Charge results from people paying penalties as a result of forgetting to pay. We also accept that there should be a small discount from the normal congestion charge fee to encourage people to use “Auto Pay” and hence reduce administration costs.

Electric Vehicle and Alternative Fuel Discounts

We generally support the proposed changes to discounts for low emission vehicles, although we would prefer to see a continuation of discounts for alternative fuel vehicles where the ownership of the vehicle does not change.

The proposals indicate that the discount would cease from Jan 2013. We do not think it fair that people who purchased such vehicles, or had them converted to alternative fuels, on the basis of stated legislation should lose this discount. Less than three years notice of a change of regulations is not adequate if people are going to have confidence in purchasing new low emission vehicles. Any such change of regulations should only apply to new owners of such vehicles not to those who simply retain existing ones.

We also have concerns that the inclusion of *"cars that emit 100g/km of CO2 or less and that meet the Euro 5 standard for air quality"* in the discount arrangements. At the moment there are 21 cars in VED band A (those that emit less than 101 grams of CO2 per kilometer), 20 with diesel engines and one petrol. As we pointed out in our submission to the Air Quality Strategy consultation, pollutants are typically higher with diesel engines than with petrol engines. Particulates are a significant problem with diesel engines, and poor maintenance and cold starts make them worse. Though the authorised limits for the level of these pollutants are a lot lower than they were, the new proposals will encourage more people to buy diesels (in band A) and to drive them into the centre of the city. Has this issue been carefully examined to see if there will really be any benefit from permitting such diesel engined vehicles to obtain a discount?

Yours sincerely

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About The Association of British Drivers (ABD)

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 Association 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.abd.org.uk