



The Association of British Drivers

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Congestion Charging Western Extension Consultation
Transport for London
Chiswick Gate
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London
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Consultation on the Western Extension of the London Congestion Charge

Dear Sirs,

The following is our full response to the above consultation.

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.

The mayor at that time said that the proposal "*was controversial*" and went on to say in his announcement statement that "*consultations of this type ...inevitably tend to elicit responses primarily from those opposed to whatever is being consulted upon...*" and even went on to suggest that the negative responses resulted from an organised campaign against the proposal. To demonstrate that he was denying the obvious truth, the consultation process also included a public "attitudinal survey" from which the responses were as follows (the result was still strongly opposed to an extension of the charging zone of course).

Response	Percentage %
Strongly in favour	15
In Favour	21
Neither	18
Against	15
Strongly Against	30
Don't Know	2

However, we welcome this renewed attempt to obtain the views of Londoners.

Congestion Charging Shown to be a Failure

In our view the recent publication by Transport for London (TfL) shows the truth of congestion charging. The latest Annual Monitoring Report from TfL shows 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

The 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 the 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 Consultation Document

Unfortunately the new Consultation Leaflet is a typical example of documents emanating from Transport for London (TfL), and grossly misleads the public about the success of the scheme.

The new consultation continues to propagate myths about the success of the scheme. For example it says "*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 reduction in "net revenue" of £70m that TfL claim would occur if the Western Extension was scrapped is in our view a figment of their imagination. We believe the surplus of income over expenditure for the Western Extension is more like £15m so scrapping it would not reduce income by the amount claimed.

In addition it suggests that the Western Extension has had no obvious impacts on business and the economy which flies in the face of commonly reported facts.

Other Options Suggested

The consultation document is remarkable in that it even suggests that one option to improve the system might be to reduce the residents discounted charge to zero.

This is truly odd because residents' vehicles contribute to congestion just as much as visitors or transit vehicles. One of the major problems with the existing congestion charge scheme, and why it lacks effectiveness to reduce congestion, is the large number of exemptions. This undermines the economics of the scheme.

Although we don't object to making the congestion charge more flexible and easier to pay, we believe it should be scrapped rather than meddled with.

Poor Economics

Apart from the ineffectiveness of the Western Extension in meeting its stated objective of reducing congestion, it 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

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. The defects of the scheme cannot be tackled by tinkering with it – indeed the proposed changes are likely to reduce the economic viability of the scheme while making congestion worse.

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.

Yours sincerely

Roger Lawson
ABD London Co-Ordinator

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.freedomfordrivers.org