



The Association of British Drivers

London Region: PO Box 62, Chislehurst, Kent, BR7 5YB; Tel: 020-8467-2686; Web: www.abd.org.uk

Dartford Crossing Charges Consultation
Department for Transport
Great Minster House, 76 Marsham St
London
SW1P 4DR

Via Email: Dartford.ChargesConsultation@dft.gsi.gov.uk

3 August 2011

Response to Consultation on Revised Charges for the Dartford Crossing.

Dear Sirs,

Herewith is our response to the Consultation on Revised Charges for the Dartford Crossing. We have responded specifically to the questions posed (numbered as per your numbering) in the first section of our response, with some more general comments at the end.

1. Do you agree or disagree with the approach of increasing the charges for cash payments for all categories of vehicle by broadly equivalent rates?

We do not agree with the proposals to increase the charges at all. Indeed we suggest that the charges should be removed (as originally promised when the bridge had been paid for) because that is the only certain way to cure the congestion problem.

The arguments for increasing the charges are defective, and it is clear that the primary reason they are being increased is to raise more money for the Government – in effect via taxation of road users. The main argument for such charges (and for increasing them) seems to be that the charges will dissuade users from using the crossing. To quote from page 13 of the Consultation document: *“The increase in charges reduces congestion by dissuading some road users from using the congested crossing. The consequent reduction in congestion is a benefit to all remaining users of the Crossing.”* That statement is justified in the detailed financial analysis (the Impact Assessment) which is also defective.

In both cases, the impact of deterring some people from using the Crossing by imposing higher charges ignores two important results:

- A) We suggest most traffic that might be deterred by an increased charge would divert via other routes – primarily via the Blackwall Tunnel which is already heavily congested at the same times as the Dartford crossing. No cost of that congestion has been taken into account. Alternatively they would divert through central London, hardly an ideal outcome, or around the southern/western side of the M25. This will increase congestion on that section of the M25 and impose significant additional environmental costs because of the extra distance travelled (more emissions for example). These costs have been simply ignored in the financial analysis.
- B) It seems to be assumed that some users of the crossing would simply decide not to travel at all, or presumably they might instead use public transport to get to their destination. In the latter case, they would presumably incur significant extra journey times because they are already choosing to use the Crossing when it is congested so it must clearly be a faster route even now for most journeys. In this case therefore, there should be some estimate applied of the extra journey time cost (using the same rates as applied to the journey time savings of those paying the higher rates in the document). No such estimate has been included in the costs analysis.

Neither has there been any attempt to estimate the financial disbenefit to those who decide not to travel at all. This is not difficult to calculate as obviously the way people value this is based on the proposed charges. With the increased charges it is estimated that a certain percentage will not travel (or choose some alternative route). So they clearly value the ability to travel as being equivalent to the charges. Such a value should be added into the calculations.

It is clear from the above comments that no proper, comprehensive evaluation of the cost/benefits of the proposed changes has been undertaken.

Our other reason for opposing any increase in charges is simply because we believe that all charges should be removed as was originally promised by the Government when the bridge had been paid for. This would remove most of the congestion that takes place at the Crossing. It is obvious to anyone who is a frequent user of this crossing that it is the toll booths that create the congestion. There is often free flowing traffic before and after the Crossing, but congestion leading up to the toll booths.

In addition, there is no financial analysis included in the report of the cost/benefit of removing all charges. Why not? As the estimated revenue from the proposed higher charges is of the order of £100m over the "appraisal period", a rough estimate of the benefit of removing the existing charges must be at least £200m. The fact that no such option was included in the consultation document and evaluated therein makes it very clear that these proposals are not concerned with evaluating all possible options in a neutral manner, but that it is simply a front to justify raising more revenue for the benefit of the Government.

2. Do you agree or disagree that current rates of discount should continue to apply for Dart-Tag account holders?

If charges are to remain, then we agree that there should be discounts for the use of Dart-Tag. Such usage encourages freer traffic flows. Indeed we suggest that discounts for such use should be made higher so as to encourage even occasional users to take up Dart-Tag.

3. Do you agree or disagree with the approach of introducing changes in 2011 and 2012?

We disagree for the reasons give in our response to question 1.

4. Do you have specific comments on the draft Order (at Appendix B)? If so, please add.

We have no comments on this.

5. Do you agree or disagree that the current terms of the Local Residents Discount Scheme should remain unchanged?

We see no justification for the continuance of the Local Residents Discount Scheme which seems to be little used in any case. We do not understand the justification for such residents to be able to obtain a discount. This suggests that it is a political "sop" to enable such residents to support high charges on the Crossing when they might otherwise oppose them.

6. Do you agree or disagree that other details of the charging regime (i.e. times of operation, vehicle categories and exemptions) should remain unchanged?

We have no comments to make on this.

7. Do you agree or disagree with our assessment of the impacts of the proposals particularly on small firms and protected equality groups?

The impact assessment is clearly defective, as explained in our response to Question 1. In addition as with all road user charges schemes, it has a negative impact on poorer sections of the population. In effect, the wealthier private car owners or business vehicle owners are paying more to obtain road space (i.e. in reduced congestion), to the detriment of the less wealthy. There has been no assessment of the divisive nature of increasing the charges.

Commercial Vehicle Traffic

We also wish to point out that the crossing is the major north/south route for truckers between Dover, the home counties and the midlands. Dover is still the busiest cross-channel port in the UK (approx 2.3million trucks per annum) which is estimated to increase to 3 to 4 million by 2030 (source: Dover harbour board study) assuming a recovery in the economy.

The bottlenecking caused by tolls adds considerably to business costs and acts as a brake to economic expansion in the Thames Gateway and nearby areas. The payment of tolls by commercial vehicles is one major cause of congestion at the toll booths.

The French have already started work on expanding Calais port and only a Government blinded by the prospect of increased revenue can continue to ignore the extra traffic movements this will entail.

The Coalition, having cut some £30 billion of proposed road projects last year, did say it would consider schemes that promoted economic growth. The removal of tolls at Dartford would significantly boost economic growth by cutting journey times and it would also reduce emissions. The small cost of maintaining the tunnel - some £20 million year - is a tiny sum when total motoring taxes of £46 billion per annum are taken into consideration.

Temporary Suspension of the Tolls

As regards the proposal to temporarily suspend the tolls in response to an emergency, we do not think that this will have significant benefits because of the way the detail rules have been defined. For example to define "severe congestion" as existing when the queues extend as far back as the A12 (Junction 28) on the southbound route, or to Junction 4 on the northbound route, is much too tight.

That is many miles of congestion and will take hours to clear even if the tolls are removed.

Of course the fact that it is even being proposed suggests that there is an acknowledgement that removing the tolls will increase traffic flow substantially – something that has been previously denied by Government agencies.

Summary

In summary, the consultation document is clearly not an unbiased analysis of the available options. It is grossly defective and has been written simply to justify the proposed increase in charges.

This is a not a fair and unbiased consultation, but an attempt by the Government to simply raise more revenue from road users to fill its tax coffers.

Yours sincerely

Roger Lawson
London Co-Ordinator
Email: roger.lawson@abd.org.uk

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 sites at www.freedomfordrivers.org and www.abd.org.uk

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