

Consultation on Proposed changes to the Congestion Charge

Introduction

1. This submission to the consultation is from the National Alliance Against Tolls (NAAT) which was formed in 2004 by groups protesting against tolls in England, Scotland and Wales. We are an alliance and don't have a formal organisation as a company, charity or anything else. We do not have officers or funds and do not seek funds from anyone or any organisation.
2. Our alliance was formed to oppose bridge and tunnel tolls, but towards the end of 2004 we took a major part in the opposition to the plan for a "congestion charge" in Edinburgh and the later plans to introduce them in Greater Manchester and elsewhere though "TIF". We had a small involvement in the opposition prior to the implementation of the Western extension to the London scheme. We also site information on the scheme at - <http://notolls.org.uk/london.htm>.
3. "Congestion charge" is a euphemism for a toll, and as toll is shorter we have mainly used that word in this submission.

General comments on the removal of the Western extension

4. Before the Mayor was elected he said that he would consult on the possible removal of the extension to the tolled area, and that if the consultation showed that people wanted the extension removed then it would be.
5. The groups that are for tolls in one form or another include the well off to whom the cost is either negligible or is reimbursable to them, and various shades of green who will support anything that they believe hits drivers. There should be no doubt that, despite their clamour, these groups do not represent the population as a whole. Despite bias intended to procure a "yes" vote, there were substantial majorities against charges in the two local polls that have been held in Britain – 74 per cent in Edinburgh in February 2005, and 79 per cent in Greater Manchester in December 2008.

6. There are various reasons why people oppose tolls and reject what is told them by those who push tolling. One reason applies to drivers – they dislike tolls as they are a most inconvenient form of tax. The other reasons also apply to many people who are not drivers -

- * They believe that tolls are an unfair and regressive tax.
- * They do not trust that they are being given the full facts.
- * They have some inkling that much of the money is wasted in the cost of collection and enforcement.
- * They believe that it will have an adverse effect on those businesses that are inside the tolled area.
- * They doubt whether it will have the claimed effects on congestion.

7. TfL will know the full facts, including –

- * That after an initial improvement, traffic speeds in the toll zone went back to what they were.
- * That up to March 2009 the gross income was nearly £1.6 billion but that after set up costs, administration and bad debts, the net income was less than a quarter of that.
- * That as per the London Chamber of Commerce (Third Retail report), FPB and FSB, retail businesses report to them that the toll has had a significant adverse effect.

Air quality and the charge zone

8. One of the points that those who want to keep the western extension mention is the effect on Air quality, including CO₂. The latter is of course not a pollutant, though it is commonly said to be responsible for “climate change”. The suggestion that one purpose of a charge should be to reduce CO₂ is clutching at invisible straws. The western extension area is less than 2% of London, and according to DEFRA / DfT figures, the amount of CO₂ in Britain that comes from cars is about 13%. So even if a glass dome was constructed to isolate London air from the rest of the planet, the change in CO₂ would not be detectable.

9. There are of course real pollutants that are produced by cars and other road transport, but the effect of cars is grossly exaggerated. We will take as an example what is probably the most serious pollutant – fine particulate matter or PM10s.

10. The National Atmospheric Emissions Directory gives the sources for PM10s at - http://www.naei.org.uk/emissions/emissions_2006/summary_tables.php?action=unece&page_name=PM1006.html . For the latest year in the table there were (including aviation etc) 167.5 ktonnes of PM10s of which 6.0 ktonnes is from car engines, and adding to this most of the brake and tyre wear figure gives a figure of about 8 to 9%. The percentage coming from other forms of road transport is about 12%.

11. These are national figures, and we realise that in the centres of a city the proportion of pollutants that comes from cars and other road transport will be far higher than the average. But this begs the question of where the high concentrations in the centre of London come from. The answer in the case of London may not be publicly available, but when we were campaigning against the Edinburgh “Congestion Charge” we looked at the claims that the toll would improve air quality. We had the good fortune that Edinburgh Council, had published data on air quality for the centre of the city, perhaps not realising that it contradicted their claims about the effect of a toll on air quality. The report gave the sources of PM10s for two of the busiest streets in the central area – in Princes Street only 5% was from cars and for the Haymarket only 8%. Almost all the pollution was coming from buses and commercial vehicles - <http://download.edinburgh.gov.uk/AirQuality/ActionPlanSummary.pdf>

12. We would also point out that some of the exaggerated ideas that people have about the effects of cars on air quality may be due to the unclear presentation of information by TfL. We first looked at the London toll zone when we were opposing the Edinburgh plan, when TfL had just published London Congestion Charge - the Impacts Monitoring Summary report of January 2005 - <http://www.tfl.gov.uk/assets/downloads/impacts-monitoring-report-january-2005.pdf>

13. The report's section on PM10s is on pages 35/36. The graph (figure 24) gave the impression that PM10s fell after "Charging starts". This impression is because the line for the "Charging starts" was shown at March 2002 and not March 2003. If you relook at the graph but with the line for the start of the charge moved to March 2003, then you will see that most of the figures rise after March 2003.
14. The most recent TfL published data on this seems to be the Sixth Annual Monitoring report - <http://www.tfl.gov.uk/assets/downloads/sixth-annual-impacts-monitoring-report-2008-07.pdf> . This shows a graph for PM10s at figure 5.12 on page 108. The graph only shows from the start of the charge. If the period prior to 2003 had been shown then it would have been evident that PM10s are still higher than before the charge was introduced.
15. In brief, there is no evidence that the toll zone has had any effect on lowering PM10s. Our assumption is that the driver for this figure is buses and PM10s have increased because there are more buses.

Other proposals

16. We are of course opposed to any increase in the toll.
17. We believe that cleaner vehicles should be encouraged by regulating for more efficient engines and by concentrating road user taxes on to fuel. So –
- * We support the removal of the "Alternative Fuel" discount.
 - * We do not support the introduction of a "Greener Vehicle" discount.
 - * We believe that the "Electric Vehicle" discount should be scrapped rather than changed.
18. We do not support a discount for "Congestion Charging Auto Pay" as it favours the well off against the mass of drivers who will only infrequently enter the tolled area.

END