

A report from the Safe Speed road safety campaign:  
<http://www.safespeed.org.uk>



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## **Road Pricing – Money for nothing (except pricing the poor off the roads)**

*“Doing nothing is not an option”, said the Transport Minister. That’s funny – Transport Ministers have been busy doing nothing for years, and now that under-investment is catching up with them they want to use road pricing as an excuse to do nothing for another decade.*

### **Executive summary**

Road pricing is a complex and hugely expensive approach to the problem of dealing with congestion. The benefits of forced modal shift, possible increased taxation income from motorists and possible reduced congestion are far outweighed by the many disadvantages. These include: social exclusion and increased social isolation for the poor and disabled, poorer access to medical care, technological limitations causing disputes and billing errors, the shift of congestion onto rural and more dangerous routes, instability in the housing and job markets, higher business costs to offset increased wages for irreplaceable workers and a very real danger of further invasion of privacy due to abuse of the information gathered. The transport select committee has already expressed doubt road pricing will reduce congestion. If it won't, what exactly is it for?

Congestion charging cannot possibly represent value for money.

Good management and sound investment are the only real solutions to traffic congestion. Road pricing is not good management – it’s a bad excuse for another decade of under-investment.

The critical component of the report is 18 key conclusions, presented at the end.

### **Understanding the context...**

Road pricing is huge in the news. The government insists that ‘something must be done’ if we’re not to descend into transport chaos and certain gridlock.

In order to make a judgement about the sense in the proposals, we need to find some key answers to key questions:

- Will road pricing actually reduce congestion in a long term sustainable way?
- If it will, or even might, do the pros outweigh the cons?
- If growth of congestion is a ‘real’ problem, what alternative policies might help?
- Might road pricing deliver some social benefit, other than congestion busting, which would make it worthwhile?

We must start by exploring the nature of congestion itself. Occasional congestion may arise due to road-works, crashes or exceptional weather, but those are not the sorts of problems that road pricing might address.

‘Regular’ congestion arises because many people want to be in the same place at the same time. Usually the people will be involved in ‘economic activity’; carrying on business, travelling to work, shopping or visiting sporting or entertainment events. Congestion may be undesirable and inefficient, but it is a sure indicator of economic success. It can only arise when large numbers of people desire whatever it is at the other end of their journey.

Congestion costs business around £20 billion pounds per year according to several estimates. Workers and equipment stuck in traffic are not doing useful work, but the workers are still getting paid and the equipment still is both unavailable and depreciating.

But business always seeks to minimise costs and no one likes to waste time sitting in congestion. If a business can re-locate for better road connection then it may well do so. If an individual can arrange to travel at a different time to avoid congestion then they will do so.

What do we do to manage our involvement in congestion, right now?

- We make immediate travel decisions based on estimates of how long it will take to travel (have I got time to get to the shops?, that sort of thing).
- We try to avoid travelling at the busiest times. (If we leave now we can miss the rush hour!)
- We try to find the least congested routes
- We actively choose where we live and work to ensure that the regular journeys are reasonable and acceptable.
- We choose to shop in convenient locations, often basing our decisions on congestion or available parking.
- Business is always cost conscious and will choose to operate from convenient premises that are not too badly affected by congestion. This is one of the primary creators of the 'M4 corridor', out-of-town business parks and so on.

We need to know how road pricing can add to these existing regulatory mechanisms. Can it replace them with something better? One particular problem that road pricing ignores is that different members of society value time and money differently. With a stinging price attached to the use of a road, it is perfectly clear that the less well off simply won't be able to afford to use it. This means less traffic and this is the fundamental assumption that supports the basic idea of road pricing. You might think that this is the result – less traffic, less congestion and road pricing has done its job.

But the changes don't stop there. Now that the example road has less traffic and reduced travel time, we should expect better off road users who were previously time-constrained from using the road will now find themselves able to take advantage of the improved conditions. A new balance is struck with similar traffic levels to those that were present originally, but now the users of the road are on average more wealthy.

The net effect on congestion was close to zero. It might be equivalent to the growth in traffic expected in a couple of years. It might be less.

And this is the most fundamental problem with the whole idea of road pricing. Road pricing adds a regulatory mechanism to the road space 'market'. The road pricing proponents more-or-less ignore the fact that the road space 'market' is already well regulated by travel time.

Congestion can only be reduced with prices set at such a stinging level that a significant proportion of the population can no longer afford to use the roads reducing total traffic.

Road pricing would be enormously expensive. It would be the biggest IT project ever seriously considered anywhere in the world, and the cost doesn't stop with creating the infrastructure. After installation, it needs to be managed, protected from fraud, and somehow will need to get monthly bills paid by over 30 million road users. The costs are measured in billions of pounds. Without road pricing those billions are available, possibly from existing motoring taxation, to pay from physical transport improvements.

Assuming an annual running cost in excess of 6 billion pounds, we would need to be very convinced that we couldn't get greater improvements in transport efficiency by spending the running costs on physical infrastructure improvements and good traffic management.

## What is road pricing?

"Road pricing" is charging for the use of streets and roads, usually by charging motorists directly for their use. It can include tolls (such as the QE2 crossing), as well as charges imposed for the use of any roads

within a defined zone (e.g. Central London congestion charge). In the future, it is proposed to include differential charging of road users according to factors such as the time-of-day and roads used rather than solely on fixed costs relating to engine size and fuel used. By increasing charges on chosen roads at specific times of day, particularly at times of high congestion, it is claimed that congestion will be levelled off due to road users time-shifting their journeys and/or by changing to public transport.

## What technology will be used?

The two technologies most likely to be employed for the implementation of road pricing are GPS and "Tag and Beacon". The use of GPS would involve the fitment of a black box in every vehicle - which would communicate periodically with a central server - enabling its location to be logged continually. The vehicle owner can then be billed according to a pre-determined charging scheme. "Tag and Beacon" would involve owners having electronic tags in their car to be sensed roadside readers as they pass in and out of a charged area. Billing could be periodic or via pre-payment style credit so charges are deducted in real time.

## The consequences of road pricing in detail

### Effects on poorer people

The poorer sections of society will feel the impact of increased mobility most acutely. Authorities estimate that there are currently 2 million untaxed and often uninsured vehicles, suggesting that motoring costs are already too high for many. Insurance premiums are rising - particularly among those living in poorer areas who are more frequently the victim of car crime - and insurance avoidance is at a record high. The one third of households that are at least partly dependent on benefits will be those priced from the roads first.

### Effects on social inclusion

Poorer groups will find their social isolation increasing, particularly the disabled who find much public transport difficult to use. Many of the disabled have cars provided by disability benefit in recognition of the need for those with reduced physical mobility to being able to carry out independently such basic tasks as shopping and travel to hospitals. Those with serious medical conditions needing regular treatment could be looking at having to choose between keeping their hospital appointments and affording basic necessities. With prices likely to be £1 a mile within cities a car trip to a local hospital could cost an extra £10 to £15. Those needing dialysis 3 times a week could have to find an extra £100-£200 a month. In some areas, patients to have to travel 40 miles to appointments, resulting in what is currently a £10 trip becoming an £80 trip plus the existing fuel cost. With local hospitals closing and being consolidated at sites further away, road pricing will present populations they serve with a "double whammy". Those with illnesses necessitating travel to specialist centres many miles away could be hit with huge bills.

Also, out of hours access to, and home visits by, local doctors has ceased in most areas, facing those with non life-threatening but serious conditions with travel to hospitals or NHS centres 10 to 20 miles away. Increased travel costs would also hit the relatives of those in hospital who wish to visit them. Close relatives usually like to visit loved ones several times a week and having to reduce those visits would put undue strain on an already difficult family situation. Hardest hit could be children in hospital who will be too young to understand why they are receiving fewer visits from their family.

### Complicated journey planning

The probable unpredictability of charges for a journey would further complicate the situation for travellers. At the moment, when planning a journey, the majority only consider the time involved and choose the most effective and quickest route. This is usually the least congested route as most drivers will vary their route if they find themselves constantly stuck in heavy traffic. Satellite navigation has simplified this as some systems provide real time updates of traffic conditions, allowing drivers to be re-directed automatically to a less congested route. Road charging, for many, would change this by making the cheapest route the most important. If motorways are charged at a much higher rate than A or B roads it is probable that large volumes of traffic will use much less suitable routes. Given that rural roads have a higher accident rate than motorways this has serious implications for road safety.

## **Displaced traffic**

Previously quiet roads could become congested as drivers try to avoid expensive routes. Congestion problems could be compounded by drivers taking circuitous routes to avoid high charging areas, thus swamping unsuitable roads. Unless charging schemes have real time monitoring of traffic conditions, allowing a continuously variable rate to be calculated and applied, they will be unable to react useful to changes in journey patterns. Such a continuously variable rate, although fairer in some ways, would make charging more difficult. A flat rate per mile everywhere is also unworkable as people would choose unsuitable roads to shave a few miles off their journeys as, with charges likely to be averaging 50p a mile at busy times, a mile or two saved each day could equate to several hundred pounds a year.

## **The Low Paid**

Those low-paid jobs may be unable to continue to work because of the increased costs of commuting. Such people are also the least able to afford the cost of moving closer to work which, with the high cost of moving home and property, is only an option for the well off - who wouldn't need to move anyway. Those in the poverty trap would not be able to take up jobs for which they are qualified as the cost of commuting would make it unviable. The cost to the economy in reduced job flexibility could run into millions of pounds. Social services budgets would be hard hit by increased numbers of unemployed people who would have been able to work if they could afford to travel. Families losing one or even two incomes due to these changes would face facing repossession and being forced from their homes.

## **Impact on business**

Businesses in high charge areas would have greater problems recruiting and this would be likely to result in rampant wage inflation as companies struggle to find staff who will work for them. Businesses which rely on visits from customers, for example show-rooms, would also find takings falling as people are put off by the high cost of travel. On the other hand, internet-based business, unconstrained by these costs, will boom – as much of this could be based in other countries, the overall impact on the economy could be serious. Again the less well off will suffer most as they are less likely to have internet access and to be able to shop around. The trend to outsource work to overseas to reduce costs would escalate as many businesses realise that operating in the UK was beyond their means, again with huge costs in unemployment and personal costs for those losing jobs and livelihoods.

## **Travel and tourism**

The impact of road pricing will be felt by the travel and tourism industry on which many areas of the country are dependent. If road pricing makes travel to, from and around those areas more expensive, more people allow the plane to “take the strain” rather than using their private car. Travel by train or other public transport is not feasible with a young family in terms of cost, convenience, and practicality. With cheap and freely available discount air travel, families will not pay out several hundred pounds to travel to the likes of Cornwall or the Lakes when the same money will take them abroad where tourists are welcomed and valued.

## **Impact on tradespeople**

Self employed tradesmen will have to decide between charging customers more if they live in expensive areas, increasing charges across the board or refusing to visit those people in high-charge areas. The unpredictability of charging would make matters worse. Most tradesmen arrive, assess what they need and then go and fetch it. Unless real-time billing information is available, how would they provide on-the-job estimates, and recover their travel costs? Perhaps they will start carrying everything that might possibly be needed in the back of their van - thus necessitating a much bigger and more environmentally damaging vehicle - to avoid extra charges!

Will small trades-people be exempt? If so, one can see a sudden explosion in the numbers of self-employed tradesmen who curiously work only at their previous workplace, the local supermarket and an assortment of relatives' and friends' houses! What would happen to delivery services in high-charge areas, would their residents pay extra or would companies refuse to deliver? Other possible losers would be driving school instructors, who currently take pupils around a wide range of areas and driving conditions. They would have to consider restricting the range of driving experiences offered or pass on charges for lessons conducted at busy times. Market forces would be likely to lead to people only having lessons at "cheap" times and in quiet locations thus disadvantaging them for driving in the real world. Similar problems would be encountered with driving tests.

### **Key workers**

Key workers are already priced out of many areas of large cities. With congestion charging not only will those workers be unable to afford housing near where they work, they will be unable to afford travel there either. The impact on the NHS, fire service and police force will be serious as they will have to face higher wage costs or massive losses of staff. Exemptions for key workers would create ill-will from other lower paid, but still important, workers finding themselves unable to work due to increased travel costs.

### **Impacts on rural communities**

Villages and small communities with a high number of commuters or second home owners might face an uncertain future due to increased travel costs. Whilst some might find the idea that second-home owners will sell up appealing, the future of such communities will largely depend on the depth of the pockets of the locals and the location of their jobs.

### **Impacts on property values**

Price differentials in travel costs could destabilise an already strained house market. Houses in cheap areas could rocket in value and those in high-charge areas become difficult to sell, leaving many borrowers who are currently over-stretched facing possible negative equity from which they will be unable extricate themselves. Lenders may never realise a decent amount for repossessed properties - leaving the former owners in massive debt for many years.

### **Exemptions**

The issue of exemptions is complex. Who should be included and who left out? Exemptions for the disabled or those travelling to hospital appointments would seem fair, but would be costly to administer and open to abuse.

### **Environment**

The environmental implications of vehicle tracking schemes are complex and far from minor. Any savings in pollution from drivers choosing not to travel could be far outweighed by others travelling further to reduce their costs plus the cost of manufacture and fitting of the tracking devices. These devices will eventually fail and require replacement - further consuming finite resources.

### **Location reliability**

GPS signals are quite weak and are error prone. Many satellite navigation systems can be confused by parallel roads. Drivers travelling close to a motorway risk being charged the higher rate even though they weren't on it. Reassuring drivers that they had been correctly charged would require full itemisation and, to avoid discriminating further against the less well-off, a paper billing method will have to be available. Even on a periodic billing cycle that represents huge quantities of paper, envelopes and human time and effort. For the high mileage driver there could be masses of paper arriving every month. Call centres will be

needed to deal with the inevitably high level of enquiry and dispute, as will an independent dispute resolution system.

## **Data Processing Loads**

Assuming the use of GPS, the logistics of processing all the location information would be substantial. Depending on the boundaries between differently charged areas and the granularity wanted, vehicles could need to be monitored every few seconds. Coordinates would then have to be sent to a central server, and the load on the GSM network (assuming that is the transmission medium used) could be significant. There are many areas where data coverage is poor and connections are slow, this will necessitate authorities paying for the extra bandwidth needed and dealing with residents objections to the additional cellular masts needed to provide it.

## **Running out of credit**

Whilst “pay as you go” is alternative option, most people would want the choice of full billing information. Mobile companies have facilities to check balances and see calling information online and in real time. Any system would have to incorporate these features if paper billing was not to be used. For many the idea of a black box in their car which will stop it from doing what they want will mystify them. This will put additional strain on breakdown services as they will be constantly called out non-technical drivers who have run out of credit and whose car will not start (assuming those out of credit or owing payments up will be unable to travel).

## **Data security**

Data security is an important concern. A database full of location information about every vehicle owner in the country could become a target for organised crime. It is likely that GPS black-boxes or tags would be cloned within months of their first release. Employees working in sensitive companies such as banks or animal testing labs could easily become an easier target given access to location data. The cynical might expect MPs to exempt themselves and leave the rest of the population to suffer the consequences. The police and government security agencies could also use this data in a way in which we are being assured it will not be. This could be bad news for anyone that happens to be in the same area as, for example, two separate bank robberies as they will almost certainly be assumed to have been involved in some way. There could be real danger of “guilt by location” – as opposed to association.

## **Non-payment**

What will happen to those that can't or won't pay. Will their car be crushed? Will points be put on their licence or will they just be fined? More seriously, will any of this matter if they drive a cheap, unregistered throwaway? With 2 million untaxed and/or uninsured drivers already does it not seem likely that there will even more? There might be mass refusal to comply - with the “Number 10” road-pricing petition having registered over 1.5 million signatures there are likely to be many more who object to the proposals than that. Others disagreeing with the proposals will be happy to hamper any implementation, and it remains to be seen how far people might go to avoid being charged. Will little old ladies develop lucrative side-lines in carrying around neighbours black-boxes on cheap journeys whilst they make high-charge journeys to work? It is dubious that the accuracy of any GPS system used would accurate enough to tell the difference between 1 car with several boxes and a several cars. The implications for respect for the law are very worrying.

## **Foreign vehicles**

UK roads are heavily used by foreign registered vehicles. With fuel taxation all vehicles end up paying according to distanced travelled. With a black-box charging system it is presumably not feasible to fit these to every vehicle that enters the UK. The issue could even extend to vehicles registered in Wales and Scotland

as both have a choice of whether to implement road charging or not and may decide not to so because of the potential impact on tourism.

### **Risks of overselling**

There is much strong feeling that government is ever increasingly intruding into people's private lives and charging them for the privilege. Many will not be surprised to see road charging and vehicle tracking being promoted as yet another solution to terrorism, along with ID cards and lampposts with x ray vision.

### **Remote control safeguards**

If a proposed implementation of road pricing is to include automated and remote disablement of vehicles, safeguards will be needed to ensure that vehicles are not immobilised unnecessarily, in dangerous situations, or in error. There could be situations where someone has their car immobilised through no fault of their own and need to make an urgent journey. If the car does not detect a GPS signal on starting, will the engine be immobilised until a signal is found? If so, parking in most multi storey car-parks will become a one way trip and there could be serious personal safety implications if a driver were unable to leave a threatening situation because their car will not start until the satellites are found (which could take anything up to a minute). Those in rural areas could face potentially life threatening situations as emergency services take that much longer to reach them.

### **Responsibility for Payment**

The owner of a vehicle is not necessarily the one driving it. Where vehicles are stolen or used without the owner's full permission resolution to charging issues will be essential. For example, a garage mechanic takes a car on an extended test drive which results in the owner receiving a large bill for the journey. Without full charging transparency, neither the garage nor the owner will know the size of the bill until the owner has been charged. Worse, with pre-pay credit based systems owners could be left stranded with no credit if the vehicle were immobilised as a result.

### **Cost overruns**

Current estimates show that £60 billion will be needed for implementation. Judging from the track record of previous government IT implementations, this cost is likely to triple. This seems an excessive sum to implement an over-complex system reliant on weak GPS signals. On the other hand, while a "tag and beacon" system is much simpler, the roadside infrastructure costs would be even greater. Also, any system which relies on electronics by the roadside in known locations will be vulnerable to attack. We can infer from experiences with the destruction of speed cameras what the likely result in unpopular charging areas will be.

### **Impartial operation**

Those profiting from road pricing should not have influence on road systems as they could use this influence to force drivers onto more expensive routes. There is little mention in proposals of what happens on roads, bridges and tunnels with pre-existing tolls and charges. Will those be double charged or free from the congestion charging per mile tax altogether?

### **Charging on diversion**

It is bad enough that, with road-pricing, drivers will have to choose less suitable roads but what would happen when there are accidents or road works which cause diversions? If diversions force drivers onto more expensive routes it would seem reasonable for them to be refunded for that portion of the journey. If drivers would be charged regardless who will ensure that expensive diversion routes are not put place to increase revenues? It is clear that this has been done with traffic light phasing to create more congestion and inflate

the case for congestion charging. Changing road design for optimum flow rather than optimum driver inconvenience would of course remedy this situation.

## Alternatives to road pricing to control or mitigate congestion

### Work-related

#### **Tele-working**

Tele-working could be encouraged with appropriate grants or tax incentives. It's a clear and effective way to reduce the need to travel that fits well with modern lifestyles and family responsibilities. Advances in technology make tele-working ever-more attractive. Call centres could readily be devolved to be non-central yet just as effective with webcam for supervision of time spent by a "superuser"

#### **Car-sharing**

This one is obvious, and with a little more encouragement (perhaps tax on parking at work for lone-drivers) could bring about a significant increase, pro rata reducing volume of traffic and congestion.

#### **Public transport subsidy – an integrated transport policy**

Buses and trains so often do not "connect". Also rush hour trains are very crowded. More rolling stock?

#### **Tax on distance lived from permanent place of work**

If a tax on distance between one's permanent residence and principal place of work were introduced, this would over time encourage getting housing near one's place of work or the other way around. This would also preserve housing for village people – prevent it from being swallowed up by the city boys.

#### **Large firms laying on buses from outreach villages**

Encourage (by grant and tax incentive) employers to lay on free taxibus transport for employees living in surrounding villages.

### ***Road improvements***

#### **Restore road space (remove under-used bus lanes, other traffic obstructions)**

So often one sees an empty bus lane with a queue of traffic in the remaining lane, which one gets to the end of without a bus having used it at all. Perhaps busses in bus lanes could be treated similar to emergency vehicles, ie, bus lanes are fair game, but must immediately be evacuated for a bus coming up behind.

#### **Remove some traffic lights**

Many traffic lights, whilst erected with good intentions, have had unintended consequences. Several of these have exacerbated rather than mitigated congestion.

#### **Remove 'anti-car' policies and attendant obstacles**

Road humps (sleeping policemen) and restrictive necks (chicanes) have been introduced on several roads under the guise of road safety. They have typically had no safety benefits, often have made things worse by coercing drivers to select larger more softly sprung cars, made them choose what would be less suitable routes (but for these artificial hazards) and precipitated much unnecessary braking and accelerating with attendant increased fuel consumption, emissions and congestion. Removal of these hazards will help ease congestion.

#### **Encourage off-road parking facilities to increase road space**

As houses change hands, a policy of no on-road parking could be introduced by covenant in exchange for stamp duty. Small houses closer to the towns would therefore encourage car-less families or conversion of front gardens to provide off-street parking.



## General

### **Encourage motor bike use**

Motorbikes use less road space, but safety issues require careful consideration

### **Encourage cycling**

Expansion of the Cambridge arrangement where bikes are borrowed as required and restored to bike parks when finished with.

### **On-line shopping**

The savings here are marginal – commuting some car journeys to a lorry journey. However, overall efficiency should be gained.

### **Fuel tax**

Congestion means more idling, more stop/start – more fuel. Increase fuel tax will encourage people to choose times of lower congestion.

### **Subsidised rail freight**

Lorries cause congestion. Whilst lorries are needed at both start point and end point, much of the middle ground could be covered by rail. Subsidies there will coerce a lot of freight back to rails (and possibly canals?).

### **School buses**

Encourage use of school busses, both by subsidy for their provision and making the service free to participants

### **Manage for transport efficiency**

We have to get away from the idea that 'road transport is bad'. It's one of the main drivers of the economy. We have to manage roads for transport efficiency, not in the vain hope of forcing people out of their cars.

### **Make motorways and dual carriageways more efficient...**

#### **Get rid of speed limiters on commercial vehicles**

Truck speed limiters cause 'elephant racing' (where one lorry takes an inordinately long time to pass another because both are running on almost identical limiters).

#### **Educate drivers regarding middle/outside lane use.**

Fairly obvious, but a useful win opportunity here. More traffic police to stop and advise will help this one no end.

#### **Road works.**

Award contracts on "time is of the essence" basis. Also, penalties for late completion can be introduced retrospectively if premature repairs are required and can be attributed to breach of contract or skimping in the original work.

#### **Eliminate unnecessary parking restrictions.**

Several yellow lines have been put in place with the intention of improving traffic flow in towns. In some cases, the law of unintended consequences is people going around and around looking for the ever-more-scarce parking space.

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In summary, implementing a road pricing scheme based on congestion will simply add slightly to existing pressures experienced by all groups of road users to avoid congestion. It will not and cannot be expected to make a fundamental difference.

## Key Questions for government:

In the event that a "NO" from almost 2 million people is not enough to divert the Government from this proposal, there are some significant questions that need to be answered. Without firm answers to these questions, we cannot see how people will be persuaded that road pricing is "in our best interests":

### Motoring Costs

Q. Are the Government prepared to guarantee that the average cost of motoring will not increase? This is relevant with the background that of the £45 billion collected from motorists in tax every year, only £6 billion is spent on roads.

Q. What is the cost of the infrastructure required to operate this system? On the basis that the spend on the NHS computer system is around 20 Billion, we anticipate this will be significantly higher.

Q. Where are the funds for this infrastructure to come from, current taxes or additional taxes? What services are to be cut to fund this?

Q. What is the anticipated running cost of monitoring the movement of 30 Million vehicles and billing by the minute? Where will the funds for this come from?

Q. Will the operation be contracted to private companies? Will the profit these companies make from this be capped?

Q. What additional investment is to be made into Public Transport outside London to ensure a viable alternative?

Q. Given that motorists do not sit in congestion from choice, what options to reduce the increase in costs will there be for employees travelling to work?

Q. Will non-payment be a civil or criminal offence?

### Privacy Questions:

Q. In order to provide a bill, the system will have to track and record the movement of every vehicle at all times. A detailed bill will have to be sent to all vehicle users. How can this not be a loss of freedom of movement or an infringement of Civil Liberties?

## Conclusions:

1) Road pricing can only reduce congestion if it 'prices the poor off the roads'. Any imaginable system of road pricing would be very highly regressive and have its largest impacts on the low-paid.

2) Road pricing requires massive infrastructure, including the biggest IT project ever. Issuing and collecting over 30 million monthly bills will be extremely costly. In short road pricing itself is extremely expensive. The likely annual running cost is in excess of £4 billion. £4 billion is about half the sum that we are spending annually on the entire road network.

3) Congestion is mainly the consequence of economic activity. This economic activity is highly desirable and pays for many things including our schools and hospitals. Proper transport policy should seek to maximise economic activity rather than minimise congestion. They are not the same thing.

4) The government case does not properly allow for the self regulating properties of congestion. Business already works hard to avoid congestion because it costs money, the rest of us work hard to avoid it because we value our time. The road-space market is already extremely well regulated by travel time. Adding 'special costs' in a road pricing scheme changes the balances, but does not eliminate congestion. Travel time will remain the primary regulator.

- 5) Once the poor have been priced off the roads, the better off will soon take full advantage of improved travelling conditions, tending to restore the congestion balance.
- 6) The threats of future gridlock are false. Who would be stupid enough to sit in gridlock going nowhere day after day? If traffic got that bad, people would find alternatives, which of course reduces the traffic to a level that people find acceptable.
- 7) We are facing congestion difficulties mainly because of decades of under-investment by successive governments. This government appears to wish to use road pricing as an excuse for another decade of under-investment.
- 8) The green arguments simply won't wash. If we need a road transport 'carbon tax', then fuel duty is literally perfect, because each litre of fuel burns to give a precise and equal quantity of atmospheric carbon. Road pricing would cause folk to seek longer but cheaper routes, the opposite of the desired 'green' effect.
- 9) There are far better alternative methods for managing traffic growth.
- 10) There is only limited truth in the idea that 'new roads quickly fill up with cars'. A 6 lane motorway built along the west coast of Scotland would not fill up in the foreseeable future. Roads only fill up with cars when there is 'latent demand'.
- 11) Private motor transport is the leading form of transport throughout the modern world. It is heavily taxed, while alternative public transport systems are heavily subsidised. There's nothing wrong with that but it is essential that government recognises that a) Private motor transport is highly cost-efficient, and b) it's the most desired form of transport in all of the world's leading economies.
- 12) It will be difficult or impossible to avoid transferring traffic to less safe routes.
- 13) "You can't build your way out of congestion" isn't exactly a lie, but it's an extremely poor excuse for under-investment. Congestion is a sign of successful economic activity. When building more roads encourages more economic activity that is very likely to be a good thing for society as a whole. We need to measure and manage the economic activity before we worry about the congestion. Congestion largely looks after itself.
- 14) They claim that 'people in rural areas will pay less under a roads pricing regime, and it is likely true that there would be 'winners' on immediate transport costs. But the hugely expensive system would have to be built, operated and paid for. This means that on average we will be paying much more because of the cost of the system.
- 15) A national system of road pricing would encourage a massive range of evasion and frauds. Quite simply, many people would consider that they were better off outside the system and find all sorts of subtle and creative ways to avoid, evade and defraud the system. This would add considerably to the costs both through direct revenue losses and through high costs of enforcement.
- 16) We are not reassured by government claims that privacy would be safeguarded. It would be hard to persuade people that non-itemised bills were correct, yet an itemised bill is in itself a major invasion of privacy.
- 17) Managing non-payment is difficult and worrying. What sanctions would be applied to those who cannot or will not pay?
- 18) The protesters and objectors couldn't be more right. The government wants to waste countless billions of our money on impossible dreams.

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