

Response to the Greater London Authority's call for evidence on the proposals for Road Pricing from the Alliance of British Drivers

The Alliance of British Drivers (ABD) response to the Greater London Authority's call for evidence into its proposals for road pricing is attached below.

The ABD is a membership based organisation which is wholly independent of any political or funding agencies and is therefore able to provide valued and balanced analysis on all issues relating to personal road transport ranging from manufacturing decisions, local government initiatives and national policy.

Our unbiased focus on the impact of policy decisions has proved to be prescient concerning the impact and consequences of a wide variety of transport related schemes over the last two decades. For example, our study into the probable adverse repercussions of the move to *smart motorways* some fifteen years ago proved to be entirely accurate.

Our response to the GLA's call for evidence concerning *road pricing* is based on extensive research and analysis of the impact of such schemes in both successfully addressing the issues it is planned to ameliorate as well as the consequences for transport generally and the private motorist particularly.

The ABD is aware that the composition of the GLA Transport Committee is dominated by those who voted on the 17th of November 2022 for the paving measure amending the Mayors transport strategy. This was despite the overwhelming evidence that the ULEZ expansion and road pricing proposals are seriously flawed and do not enjoy public support. 83% of free-format comments on road pricing were against the proposals yet these have been ignored by the committee.

We are therefore concerned as to the objectivity of the Committee and we see this as a serious impediment in arriving at a widely acceptable, justifiable and sustainable outcome to this consultation. We are additionally concerned that a decision to proceed with the road pricing proposals will be taken regardless of the outcome of this consultation. We further note that the GLA has employed staff to implement the road pricing scheme. This gives a clear indication that the decision to proceed has been taken, rendering this consultation void.

We are further concerned that the expectations embodied in the Gunning Principles may not be met in the short period that has been set aside for the consultation. This is coupled with the failure of the 2022 road pricing, ULEZ and MTS consultation to reach individuals that would be disadvantaged by the proposals. We do not consider this to be an equitable approach to consulting with the electorate.

It is therefore our considered opinion that this consultation could be a little more than a "tick box" exercise. It would appear that the GLA's Transport Committee has probably already arrived at a decision in favour of the proposals that disregards a significant number of objections and an overwhelming refutation of the plans.

The ABD's response to the thirteen questions within the consultation follow overleaf.

The ABD's Response to Questions Raised by the Consultation:

1. Do the current road user charging systems in London require reform?

The ABD is unable to identify a precise road user charging system in London because the current system does not include a distance element.

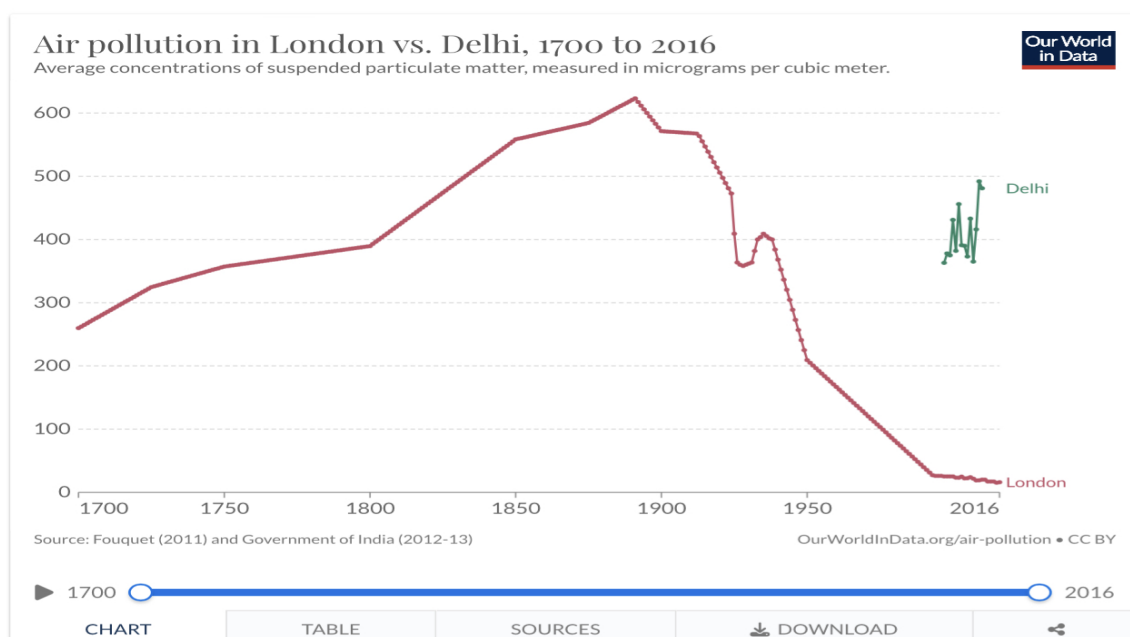
The current scheme is based on penalty or access charges. Neither of these constitute a proper road pricing scheme as it is impossible to quantify the scale of journeys undertaken that would attract a charge under the GLA proposals.

The initial so-called “congestion charge” operates as a *movement charge* within a specified geographical zone at specified times. This has latterly evolved into a blanket charge, levied at all times, and has therefore ceased to be a *congestion charge* in the accepted understanding of such a scheme. This has rendered the existing *congestion charge* to be an access charge which is a highly regressive form of taxation that offers no differentiation between vehicles in spite of the weight, distance travelled, occupancy, purpose of the journey or the ability to pay.

The second element of concern is that the proposed road pricing measures and the ULEZ scheme are, in part, based on addressing air quality within the capital using entirely erroneous estimations of the purported problem.

The reality is that the vast majority of the improvements in London's air quality does not arise from either the ULEZ in its current geographical spread, nor will its expansion or road pricing contribute to improvements in air quality. This is because London's air quality has been improved over the last 60 years by the progress in technology and legislative measures which have eliminated the vast majority of pollutants. Road-based transport that is targeted by the proposed road pricing scheme contributes a vastly diminished impact on the Capitals environment. There are far greater and more impactful issues concerning air quality that should focus the attention of the GLA such as the extraordinary pollution from the London underground, and from the simple activities of daily living, such as cooking in an enclosed home environment.

The graph below illustrates beyond all doubt that Londons air pollution levels are as near to the naturally occurring background levels as you would find even in the Amazon jungle, that is to say that persistent particulate intrusion into the Capitals atmosphere is all but zero.



However, the imprecision of this question is a matter of concern to the ABD and the electorate who routinely discuss issues of this nature with us in person and in our meetings with various local community representatives.

The ABD position is that the current road user charging system is unfit for purpose and the proposals for more elaborate schemes, such as both the ULEZ and road pricing are a disproportionate and inequitable set of measures. The proposed scheme will have a significantly damaging impact on families, trade, commerce, and the more vulnerable elements of society, such as single mothers, the handicapped or disabled, ethnic minorities and the elderly. The Jacobs consultancy response to the Mayors ULEZ proposals is unequivocal in listing these elements of the population as being at immediate risk from the proposed measures. This is unconscionable.

We cannot possibly support a battery of measures which actively discriminates against readily identifiable and vulnerable sectors of society.

The ABD strongly recommend that the GLA set aside any proposals for further regressive taxation on the population of London. The scheme is inequitable, unfair and unjustified on any moral, ethical or operational basis. The costs of providing the infrastructure and implementation of the scheme is wholly disproportionate to any advantage that may accrue to the population of the capital using any rational or coherent measure.

2. How might smarter road user charging differ from the current daily charges for driving applied in London?

The ABD wholly reject the premise that road charging is under any guise a requirement for driving in London.

Taxation is a national prerogative in the same way that MoT standards, fuel duty and VAT are set. London is not a separate jurisdiction, despite a measure of devolution. Vehicles that have passed statutory requirements, such as an MoT indicates that they are entirely compliant with prevailing legislation and therefore there is no reason why a local authority should deny access to any road or impose additional taxes.

The proposals for road pricing and the associated ULEZ are an entirely regressive taxation that has no relevance in addressing the purported issues that confront the GLA or Transport for London.

Discriminating against certain vehicle types and their users is not accepted by the ABD membership, or the electorate, with whom we have consulted on numerous occasions concerning ULEZ, LTNs, CAZ and road pricing.

3. How might charges for driving in London be varied for different types of journeys, such as travelling for work, caring responsibilities or essential services?

The idea that there are “good” and “bad” journeys at the discretion of the GLA is wholly unacceptable as it is both discriminatory and illogical. The ABD considers this to be politicisation of what should be an inalienable right to freedom of movement and association.

The attempt to differentiate between the nature and purpose of journeys is to introduce a level of inconsistency, discontinuity and infringement of basic rights of the population of London for what can only be assumed are political ends. The intrusiveness and invasion of privacy that is a key

component of the scheme, further renders the proposals as being unjustified and disproportionate.

The authority to make decisions on what constitutes an “essential” worker and by implication “non-essential” workers, and their travelling arrangements is to introduce a level of authoritarianism into the daily workings of a local council, which is inordinately disproportionate to the core functions and responsibilities which are expected of a rational Council by the electorate.

To assume the right to adjudicate as to what is a justifiable journey, and therefore a “responsible journey” is to take yet another step towards an authoritarian disposition of a local council that cannot be justified in a democratic society.

The ABD lacks confidence in any local authority having the competence, manpower and focus sufficient to operate a system that assesses and approves the utility and value of any journey, whilst assigning what is, in effect, a penalty charge. Of considerable concern is the on-costs of the inevitable bureaucracy that such a scheme will generate that will add even more layers of complexity and cash absorbing rules and regulations.

The ABD strongly rejects the idea that road pricing has any justification and considers that attempts to vary charges based on entirely politicised and subjective criteria are wholly incompatible with a democratic society and betray the motivations of those intent on implementing such a scheme.

4. What strategies and targets could smarter road user charging support?

The ABD considers that the costs of the infrastructure, monitoring costs, charging systems and penalty levies are wholly disproportionate to any advantage that may accrue from such a system. The extensive investment requirements to implement the scheme would be far better deployed in social care, protection of vulnerable elements of society and civil society infrastructure.

For road pricing to be effective it has to be absolutely cost neutral and it is not clear from the GLAs documentation that there is a recognition of the difference between “revenue neutral” and “cost neutral” taxes. It is clear that the scheme as proposed cannot possibly be a cost neutral tax.

The ABD and its members can not determine that there are any strategies and targets that smarter road user charging can support. Target-chasing inevitably leads to incentivising perverse outcomes and inevitably does more harm than good. Target-monitoring is costly and effort should instead be put into quality of urban design to free up road space and ease congestion.

British drivers already pay £50 billion in various forms of tax yet only £10 billion is assigned to roads, meaning that there is a significant subsidy to other government spending streams. To extract further taxes from drivers to overcome the GLA’s shortfall in income is inequitable and unjustifiable.

The ABD considers that the costs of implementing the scheme and retrieving fees is an expense that is wholly unnecessary: the fuel duty system has the advantage that it is easy and cheap to collect because this is undertaken by fuel distributors and is almost impossible to avoid. We suggest that motorists pay sufficient taxes through fuel duty and the added VAT and that exposure to further taxation is both inequitable and regressive.

In addition, any road user charging system that involves use of ANPR, cameras and digital tracking will require extensive investment in infrastructure costs to which the operational costs will need to be added before any taxes extracted from drivers can provide a source of revenue. It is evident that insufficient consideration has been given by the GLA to such considerations.

The ABD and a wide swathe of the electorate view the road pricing proposals as part of a political and ideological strategy to remove some 27% of car journeys from roads by the year 2030. This is a key factor within the *Element Energy* report of 2022. The idea that vehicle ownership and use is a legitimate target for political ideology is absolutely rejected by the ABD and its supporters. This objective is punitive and ill-conceived and constitutes an all out assault on the legitimate pursuits of the freedom of movement, travel and association which is antidemocratic and entirely unnecessary.

The ABD supporters contend that the road pricing proposals are no more than a cash gouging enterprise. There is not any basis for road pricing borne out in the science of atmospheric chemistry as there is not any toxic pollution in London as illustrated in the graph above.

Further claims that road pricing will ameliorate traffic congestion is equally unfounded. It is axiomatic that traffic congestion is a direct consequence of the closure of significant tracts of road space which are converted for the sole use of cyclists and bus transport. These facilities and the road space they occupy are significantly under-utilised. The volume of under-utilised eight ton double-decker buses in convoys on our roads is a material contribution to congestion in the remaining road space.

5. What technology could be used to support smarter road user charging?

The Mayor of London commissioned the Jacobs Consultancy to analyse the impact of the ULEZ scheme and their report concluded that it was necessary to deploy road cameras and the automatic numberplate recognition system for the purposes of road pricing. The Jacobs report made it clear that the ULEZ expansion to Greater London offered very little to the population of London and that it would have a particularly damaging effect on ethnic minorities, single parents, the elderly and disabled. The same analysis applies to the road pricing proposals, which can only be of benefit as a revenue generator for the GLA and Transport for London: there is no other valid reason for the implementation of this additional taxation on London's road users.

The costs of acquisition, installation and operation of the charging system will require a capital investment in excess of an estimated £240 million. These expenditures are not sunk costs, but incremental costs, that are being incurred now, on the assumption that a road pricing scheme is going to be implemented regardless. Based on this assumption, the validity and relevance of this consultation is called into question simply because the investment program has already commenced on the basis that implementation of road pricing is an established course of action that will not be amended as a consequence of this consultation.

We further understand that there are some 90 members of staff already working on designing road pricing schemes. We are extremely concerned that £5-£10million per year is being spent even while the ULEZ expansion is under both political and judicial threat.

The use of the technology required for the road pricing scheme has clear implications for civil liberties and substantial privacy concerns, whether inside or outside of a vehicle.

6. How could smarter road user charging assist with tackling current challenges such as traffic, air pollution and climate change?

The ABD rejects this premise and we address each of the three noted clauses in this question as follows:

Traffic: Much of the policy of TfL over the past several years has been to the detriment of effective traffic management and has been the actual cause of additional congestion. This has been achieved through the introduction of cycle lanes, bus lanes, LTN's, road narrowing and traffic light phasing. This has resulted in the incremental removal of significant tranches of road space and capacity reduction which is the substantive cause of considerable volumes of traffic congestion for scant advantage for most of the time.

Air Pollution: The air in London is cleaner now than at any point since at least the year 1700 AD, as illustrated in the graph above. Reference to the possibility that there have been "40,000 deaths" or "4000 deaths in London" per annum are entirely erroneous. Scientific examination of this claim shows beyond any doubt that assertions of this nature are at best ill-conceived, and at worst outright fraudulent. That fraud is committed every time the claim is repeated. Academic assessment by Cambridge University of this claim has shown unequivocally that it is a "guesstimate" at best, and has no foundation in either the science of atmospheric chemistry, or the science of mathematics. The "guesstimate" is founded on the *possibility* that pollution generically could *in extremis* have a negative impact of a few minutes per person over the entire duration of their life. This has been extrapolated across the entire population and aggregated into a mathematical equation that these few minutes per person could possibly, maybe, might sometime add up to a theoretical number of premature deaths across the entire population. This theoretical algorithmic conclusion is no more than a vague expression of a remote possibility. There is no scientific evidence that demonstrates any causal link between air pollution from road transport let alone any single death. Not even the tragic case of a young girl in London which has been used continually to substantiate claims of the lethal effects of air pollution. This unfortunate incident has not been supported by real scientific investigation where it has proved impossible to attribute to pollution. The ABD calls on the GLA transport committee to desist from reiterating this misinformation, and to set the record straight concerning the scientific basis for the health impacts of air pollution, which do not support the claims made in the road pricing documentation or the ULEZ proposals.

Climate Change: This is a further example where a false narrative has been used to justify the GLA's proposed road pricing regime. The Mayor and the GLA have based their erroneous claims of 'climate change' on cherry picked statements included in reports known as the "Summary to Policymakers" issued by the Intergovernmental Panel on Climate Change. These reports are produced by government appointed bureaucrats to overwrite the actual scientific statements made in the main body of IPCC reports by qualified scientists if those conclusions differ from the political narrative. Several scientists have spoken out about these transgressions to no avail. A few hours study would illustrate that many of the statements contained in the "Summary to Policymakers" issued by the IPCC are wholly without foundation when compared to the substantive documents written by qualified scientists that are contained in the IPCC's main report and which are not referenced in the "Summary". However, for the purposes of this consultation we will accept the premise that climate change is caused by anthropogenic based emissions of CO₂. Based on this erroneous presumption, we would note that UK emissions are 1% of the total global man made emissions. London emissions are very approximately 8% of the UK total CO₂ output. Natural emissions of CO₂ are thirty times those that are man made. A doubling of CO₂ from the current levels of 420 parts per million to over 800 ppm could *possibly* raise the global temperature by very approximately 1°C *at the most*. If all the internal combustion powered vehicles were removed from the roads of London this would have an effect of 0.00027

degrees C. The costs of achieving this theoretical and microscopically small variation in global temperatures will run into billions of pounds that will have to be levied against the citizens of London. However, this can only be achieved if *all* CO₂ emitting forms of transport including buses, underground, rail and commercial vehicles are completely removed from London. If the committee, as we suspect, believes that the use of Zero Emission Vehicles would be acceptable then we need to advise the committee that based on a *Cradle to Grave* report which the ABD has been working on for over 12 months using verified, scientific reports and data demonstrates that EV's do not have any tangible or realistic advantage over an internal combustion powered vehicle. This technical analysis is based on an assessment of a lifetimes output of CO₂ starting from the extraction of raw materials to the point at which the vehicle is recycled. When other considerations are included such as resource consumption or human impact in the Global South, the EV comes off objectively even worse.

In summary, 'smarter' road user charging cannot assist with tackling current challenges such as traffic, air pollution and climate change. Instead better quality road design is needed, along with reduced charges and support for local enterprises. Taxation and charges resolves nothing.

The ABD suggests that the transport committee reevaluate and reassess the basis upon which these claims and proposals have been made.

7. Are road user charging schemes best set up at a city or regional level, or as a national system, and what benefits or difficulties would you expect with either approach?

Any road pricing scheme based on regional locations has the potential to create confusion and conflicting criteria that would introduce considerable disruption to the effective use of road transport in commerce, public transport, emergency services, and private mobility across the country. It is already clear that the plethora of different schemes, eligibility, charging basis and methods is becoming far too complex to be comprehensible to the typical road user. We suspect that this complexity will prove to be beyond the sustainable capacity of local authorities to supervise effectively.

Unnecessary complexity should not be a barrier to freedom of movement.

8. If smarter road user charging is introduced, which charges or taxes should it replace and how should the current taxes and charges be changed?

The present tax system has two broad components: a fixed element which permits access to the roads, that is *car tax*. While this was initially largely a flat rate, changes since 2001 have introduced an ever increasing element of, in effect, penalty charges into the pricing of car tax.

The second component is a usage charge, where the tax paid is based on the distance travelled as levied by fuel taxes. The administrative complications and costs of differential charging for car tax between London cars and other communities across the rest of the UK would be a misuse of public funds and would likely render the system inoperable in part because the operational interface would be profoundly difficult and expensive to maintain. The lessons learned from the debacle over the NHS-Spine IT system would be a formative experience for aspiring systems engineers intent on implementing a battery of inter-dependent and inter-functional processes such as would be required for the road pricing scheme. The principal lesson from a 'users perspective' would be "don't".

The ABD does not think that road user charging has merit in its own right as it will be an additional tax. The GLA is not in a position to replace any other taxes that are levied on a national basis. Therefore the premise of this question lacks any meaningful purpose.

9. What discounts and exemptions would you like to see for any new smarter road charging scheme, for example to help disabled people, those on low incomes, those who need to drive for work, or people who live in areas with low levels of public transport?

This appears to be a further example of the current approach by local authorities to overcomplicate policy by selecting certain user groups for special or favourable treatment. The existing national discounts for disabled people are sufficient to address the needs of this group without further complexity or interference by a subordinate authority.

Decisions concerning the right to travel or that “travel for work” is necessary and fulfils some arbitrary criteria, decided upon by a local authority with vested interests, is unjustifiable and contravenes all reasonable measures of civil liberties and personal privacy. The justification for travelling to work - or anywhere else - must be at the absolute discretion of the individual who makes the journey. Firstly this should not be the legitimate business of the council, and secondly it is an affront to personal liberty to have to justify to some bureaucracy that a journey is necessary, as was the case in east European jurisdictions up until 1990.

As to discounts for those on low incomes, we would reject any system where income tax records became available to TfL so that preferential or punitive pricing could be applied. There is sufficient complexity in the income tax system, where every adjustment creates a fresh cluster of disadvantaged people.

By the very nature of this question, the committee has illustrated and accepted that the road pricing scheme will, by definition, have injurious consequences for disabled people, those on low incomes, those who need to drive for work or people who live in areas with low levels of public transport.

Further justification for abandoning this ill-conceived and misjudged proposal is therefore not necessary.

10. If the Government were interested in a national distance-based road user charging scheme, would London be a sensible place for a trial?

Not under any conceivable circumstances would London be a “sensible” test bed for a scheme that is actively against the interests of the electorate or the effective functioning of the capital as the economic nucleus of the UK.

Although London is not a different country, in practice the needs, availability and use of private cars and public transport are radically different for the capital.

The ABD consider that London would be the worst possible place to attempt a trial of such an ill-conceived and deleterious experiment.

11. If distance-based road user charging was introduced, do you think Londoners who drive should pay less in total for vehicle or driving-based charges, the same, or more than they do currently?

The ABD supports fiscal neutrality. Fuel duty has exceeded the social cost of vehicle use for decades and regardless of motive power the social costs remain largely the same. Consequently any changes to the taxation system should result in a reduction in the tax take from drivers.

For reference, total revenues through fuel duty, VAT and road tax amount to approximately £50bn *per annum*. From this disproportionate tax-take less than £10bn is invested back into road infrastructure. This demonstrates beyond all doubt that the UK political system routinely and regularly treats vehicle ownership and use as nothing more than a cash cow that can be milked at every turn on the whim of bureaucrats and politicians.

There is not a rational case to be made for anything other than reducing the gross tax-take from the motoring public, trade, commerce and services. Over half the population have access to and use private vehicles for very good reason. There are 37 million drivers in the UK and they pay more than their tithe for the inalienable right to freedom of travel on roads that they have paid for six times over *per annum*.

12. Mayors and local authorities currently have powers to introduce new road charging schemes. Do you think anything further is required beyond an electoral mandate for these bodies to use those powers (for example a local referendum)?

The ABD considers that a fully informed democratic process should be a fundamental right so that the electorate can sanction the use of powers in issues of such impact that they will affect every aspect of community life. Such powers as exist are there for the benefit of the community, not to fulfil the ideological and political preferences of an executive.

The mechanism through which these powers have been granted have been beyond the reach of the democratic franchise and have been achieved without full democratic participation: that is to say *nobody voted for this*. The recent consultation on the ULEZ has demonstrated that the voters of London do not support such schemes, and from our own surveys we have *prima facie* evidence that the levels of objection are far higher in the rest of the country, most notably in metropolitan conurbations. Yet those objections have been ignored and over 5,500 have been disallowed for entirely political ends.

On the recent past performance of the Mayor, the GLA and TfL concerning the ULEZ consultation, the ABD, its members and a wide range of peer groups have lost all confidence in these 'authorities' ability to run a referendum after the manifest bias in the previous ULEZ consultation.

The vast majority of people that the ABD has discussed these issues with across a spectrum of London boroughs has been unaware that the road pricing consultation was taking place. The ABD considers that the failure to widely advertise the consultation is an abuse of the powers granted to the GLA. It has been suggested in some quarters that the GLA have conducted the consultation in this way for particular reasons which exacerbates the contention that there can be scant confidence in the GLA to act responsibly in such matters.

In a democracy, the views of the voting public should not be disregarded by elected members or council officers when the result is not in keeping with the ideological or policy decisions already arrived at within the closeted environment of party political machinations. The best disinfectant

for aberrant and perverse politicised decisions is open discussions with full disclosure. What is there to hide?

13. How are other cities and countries working on similar smarter road user charging ideas faring, and what alternatives are they looking at for achieving similar policy goals?

As an indirect comparison, documented experience in the USA shows toll roads are avoided for reasons of cost and in the UK this has been mirrored with the M6T in the Midlands.

Early experience of the congestion charge in a number of jurisdictions shows that the economically disadvantaged within the congestion charge zone receive less visits, where both social contact and well-being are adversely impacted. This has been illustrated in the Jacobs Consultancy analysis of the Mayors ULEZ proposals that demonstrate that disadvantaged groups are disproportionately and adversely impacted by the proposed scheme.

Furthermore, road pricing would cause a displacement of economic activity to outside Greater London. Adding extra costs to trade, deliveries, taxi fares and personal transport will increase cost-of-living pressures on consumers, trade-and-industry, non-drivers as well as drivers.

We note that the Mayor of London is the Chair of an international organisation, funded by foreign interests, that are intent on introducing control measures on the public's right to travel at will in a number of jurisdictions. We consider this to be a material part of the move to introduce punitive levies on Londoners that are counter to the interests of the electorate and the national well-being. Any undue pressure to comply with this internationalist agenda is incompatible with the security and well-being of Londoners and should be abandoned forthwith.

Conclusions

There is very little support for the harmful and malignant proposals to introduce road pricing into London. The deleterious impact of these proposals will far outweigh any conceivable benefit. We advise the GLA to desist from embarking on a scheme that will wreak far more harm than any possible benefit.