

CONSULTATION RESPONSE FORM

PART 1 - Information about you

Name	Keith Brown, Development Manager
Address	PO Box 10405, Brentwood,
Postcode	CM14 9GT
email	Keith.brown@fsb.org.uk
Company Name or Organisation (if applicable)	Essex Region of Federation of Small Businesses
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>Essex FSB represents 4,000 businesses in Essex, Havering and Redbridge. The FSB has 200,000 members throughout the UK.</p> <p>FSB member views were researched electronically. Responses were received between 16 August and 09 September 2011.</p>	

If you would like your response or personal details to be treated **confidentially** please explain why:

N/A

PART 2 - Your Comments

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?

Disagree



Please explain your reasons and add any additional comments you wish to make:

86% of respondents disagree with the planned increase in tolls.

The reasons given for this position were: -

56% - The Dartford Crossing costs had already been recovered

23% - The current charge is already sufficient/high enough

10% - The cost should be part of highway/road/general taxation

The Government promise to remove the toll charges when the cost of the Dartford Crossing construction had been recovered and a fund established to cover the cost of on-going and future maintenance was broken in 2003.

For an additional period of 5 years, road user tolls continued to be collected before an increase of 50% was substituted as a day time congestion charge in 2008. The congestion charge has clearly failed as it is reported that the Dartford Crossing remains above capacity for 257 days each year.

Significant additional funding has therefore already been generated without a reduction to congestion or increase in capacity.

If tolls are to remain, which we strongly oppose, then the existing tolls collection system needs to be removed and replaced with a system similar to that used for the collection of the London Congestion Charge.

1. As earlier promises to remove the tolls have been broken; what assurances are there that continued and/or increased toll revenues will be allocated to improvements to the Dartford – Thurrock River Crossing and/or to future additional Thames crossing capacity?

The Transport Act 2000 introduced the concept of the tolls to “Ease congestion and finance infrastructure improvements”.

Firstly with the Dartford Crossing above design capacity for 257 days in 2010 and with an average delay of 9 minutes, the current congestion charge has failed to ease congestion.

Secondly with profits from the Dartford Crossing exceeding £40 million per annum, or in excess of £320 million since the Dartford Crossing covered its costs in 2003, the FSB believe there should already be sufficient funds to make improvements without further increases in toll charges.

The FSB do not believe it is possible to reduce congestion while tolls remain. We have already seen that change from a usage charge to a congestion charge and increasing the tolls by 50% in 2008 failed to address the problem. Without a viable alternative Thames crossing vehicles are forced to continue using the Dartford Crossing.

There are few alternative river crossing routes to the east of London and the Dartford River Crossing is the only crossing outside the London Emission Zone. Any commercial vehicle seeking an alternative could incur additional costs to use the Woolwich Ferry or the Blackwall Tunnel.

One in six respondents to the FSB survey indicated preference for a new crossing west of Dartford. Despite approval by two public enquiries in the 1970s and 1990s the Thames Gateway Bridge between Becton and Thamesmead approved in 2004 and, which should have been built by 2013, was cancelled in 2008.

2. With no practical alternative route, the FSB does not believe the reductions in traffic will be achieved. This is probably the reason that the congestion charge of £1.50 introduced in 2008 has failed to reduce congestion and the reason that the Dartford Crossing was above design capacity for 257 days in 2010.

In Scotland the Scottish government abolished tolls on the Tay, Forth and Skye crossings because they were seen as barriers to business and a tax on enterprise. This logic should be applied to the Dartford Crossing as the primary road linking the northern and southern Thames Gateway.

Most goods and services cannot be delivered or supplied on public

transport and a 2007 FSB survey of 3,500 members revealed that a vehicle was either crucial or important to their business. Increased tolls will mean increased direct cost to businesses using the crossing. Compensating productivity and efficiency improvements will only result should the delays be eliminated. Without much clearer research into the actual reduction in traffic and congestion the FSB cannot perceive any improvement.

3. At a time when the country is trying to pull the economy out of recession and has a growth agenda in Thames Gateway, where an additional 42,000 new jobs are to be created, on-going congestion should be eliminated when possible and additional business costs through increased tolls discouraged.

It is reported that tolls are required to control the flow into the tunnels. The FSB does not understand this as there are other tunnels such as the Blackwall Tunnel where this criteria does not apply. Appropriate signage directing vehicles into the correct lanes and flashing speed monitors should adequately control flows.

4. The suspension of charges when vehicles are taking more than one hour to get to the Dartford Crossing is totally unacceptable. Any queue that exceeds 15 minutes or slow and stationary traffic queuing past Junction 2 or junction 30 should automatically trigger suspension of the tolls.

According to the DfT 44,152,159 vehicles used the Dartford Crossing between 06.00 and 22.000 during the year 2010/2011 DfT Ref: 9659 10/12. This equates to an average hourly flow of 7,560 vehicles (3,780 in each direction). The Parsons Brinkerhoff final report for the DfT in January 2009 1.19 Page 5 says "The Dartford Crossing starts to offer a significantly reduced level of service (characterised as vehicles using the Dartford Crossing which experience more than nine minutes of additional delay) once flows exceed 3,000 vehicles per hour. To achieve the reductions in queues and delays traffic flows must be reduced by an average 1,560 or 20%. The graph in the Impact Assessment 7.12 page shows a maximum reduction of 5 million vehicles (from 50 M to 45M). Taking the 10% reduction on current usage still retains hourly flows at 3,402 – 13.4% above the flow rate that Parsons and Brinkerhoff state the "crossing starts to offer a significantly reduced level of service".

5. The FSB do not believe that a significant reduction of congestion will result from an increase in toll charges.

The Parsons and Brinckerhoff report to the DfT January 2008 1.18 Page 4 says: “a typical four lane section of UK motorway could support a maximum flow at or above 7,000 vehicles per hour while experiencing little variation in average speeds” The Dartford Crossing with four lanes in each direction does not offer this level of service; “as journey times show a great deal of variability and delay when flows exceed just 4,000 vehicles per hour”. A free flowing system has the potential to significantly increase the capacity of the Crossing; removal of the tolls would achieve this objective.

While the FSB are opposed to the tolls, and to any increase in toll charges, Automatic Number Plate Recognition system (ANPR) would be a means by which vehicle flows may be increased and congestion reduced. The Thurrock Gazette reported on 05 May 2009 that average speed cameras have been installed on the QE2 Bridge between Thurrock and Dartford. With southbound traffic on the Bridge already monitored by ANPR it is only necessary to implement the system for northbound traffic.

Essex FSB believes that if the tolls are to remain then the toll plaza MUST be removed to ease congestion caused by vehicles stopping to pay the toll and collection should be undertaken using an ANPR system as is used for the London Congestion Charge.

6. After 2 years we would expect that plans should have already been put in place to enable ANPR to be implemented for the Tunnels and therefore may be introduced significantly before 2013 as proposed.

7. The FSB and its Members are supporters of green issues. On this issue we would welcome a cost benefit analysis to be undertaken which assesses the environmental cost of vehicles idling and accelerating away from toll booths against the free flow of vehicles at camera controlled speeds. It does not make sense; in our understanding to raise a toll only for that benefit to be wasted on a cost to the environment whilst business have to pay the additional cost of wasted fuel by queuing at the crossing.

2. Do you agree or disagree that current

Agree

rates of discount should continue to apply for Dart-Tag account holders?	<input checked="" type="checkbox"/>	
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Please explain your reasons and add any additional comments you wish to make:

While the FSB believes the charges should be removed completely, those that regularly use the Dartford Crossing should receive a discount. Use of the Dart-Tag should be further encouraged with the provision of greater discounts and it should apply to businesses users as well as residents.

3. Do you agree or disagree with the approach of introducing changes in 2011 and 2012?		Disagree <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

The FSB believe the tolls should be removed. If the tolls are to remain, the charges should not be increased as on-going profits are already achieved from current charges.

If charges are to be changed, there will be inevitable confusion with drivers seeking coins to cover the new tariff. Any increase should be one to prices that are easy coin combinations.

If increases are to be implemented these should be once and for all to avoid added confusion with drivers having the wrong change during two periods of change.

4. Do you have specific comments on the draft Order (at Appendix B)?		NO <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

5. Do you agree or disagree that the current terms of the Local Residents Discount Scheme should remain unchanged?		Disagree <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

As above, the tolls should be removed so an answer is not required. If charges are to continue or be increased the FSB agrees that a resident's discount scheme should be maintained and extended to business users of the Dartford Crossing and should be available over a wider geographic area.

6. Do you agree or disagree that other details of the charging regime (i.e. times of operation, vehicle categories and exemptions) should remain the same?	Agree <input checked="" type="checkbox"/>	
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Please explain your reasons and add any additional comments you wish to make:

As already stated the FSB believe the tolls should be removed. If they are to be maintained or increased we agree that there should be no charge between 22.00 and 06.00 hrs.

7. Do you agree or disagree with our assessment of the impacts of the proposals particularly on small firms and protected equality groups?		Disagree <input checked="" type="checkbox"/>
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Please explain your reasons and add any additional comments you wish to make:

Business use of the Dartford Crossing (25% - 33%) is significantly greater than average road use by business (17%). Therefore increases at the Dartford Crossing will have a disproportional impact on businesses.

The FSB has shown above that the forecast reduction in congestion and time lost in queues is optimistic and that forecast benefits are not likely to be achieved.

The risk is that higher tolls will increase business costs, reduce profits or

increase prices and as a consequence make economic recovery harder to achieve.