

Annex B

Copy of email to Department for Transport Dartford Consultation - 9 March 2007

For the attention of Julian Smith
Dartford Consultation

Tonbridge & Malling Borough Council has not yet resolved a formal position on the consultation that the DfT is conducting on the proposed changes to pricing at the Dartford Crossing. Nevertheless, I hope you might find the following officer level observations of interest.

The government has rightly in my view considered and dismissed a “do nothing” option. Current conditions are already unacceptable and all the trends are for this to deteriorate. What is absolutely clear is that the toll plazas are a major contributory factor in constraining the capacity of the Dartford Crossing.

Yet the consultation by the DfT particularly emphasizes how unacceptable it is to be considering doing away with toll charges and this is based on the 2001 Study by Brown & Root. Using that Study, the DfT states that the traffic increases prompted by abolishing charges would impede traffic flow and create extensive levels of congestion even quicker than under the “do nothing” scenario. Not only do I believe the case for this to be tenuous based on the Brown & Root study, but it fails to consider an important factor. That is, the way in which the Dartford Tunnel and the Blackwall Tunnel work in close harmony. Drawing additional traffic to the Dartford Crossing, that could be dealt with if increased capacity was to be created by doing away with the toll booths, would have a beneficial effect on the Blackwall Tunnel crossing, possibly postponing or negating the need for interventions there in the future.

The proposal seemingly favoured by the DfT is one involving an increase in day-time charges, free over-night crossing and a significantly discounted Dart-Tag. It is unarguable in terms of value for money and public policy that best use should be made out of public assets. Given that there is considerable capacity at the Dartford Crossing over-night, it must be right to exploit that unused capacity. The no-charge over-night proposal could free up some of the day-time capacity but it is not at all clear from the consultation the extent to which this might be achieved. The Brown & Root study made a careful analysis of the elasticity of demand at this crossing and found it to be low. That suggests that there may not be the degree of flexibility in drivers' travel times as the proponents of the change believe. What there could be are 'edge effects' with those whose journeys are near the time of the charging thresholds bringing their travel forward or back to drop into the free period. This could create a potentially major traffic management problem in its own right.

The suggestion is that HGV traffic could be encouraged to exploit the free overnight concession and a proportion of it probably will. The figures show that this element of the traffic flow represents just over a tenth of all vehicles using the tunnel. Consequently, even if half of all lorries retimed their journeys to the overnight slot, which we believe would be very optimistic, it would only make a 5 or 6% difference to the day time flows.

The real benefit would be derived from significant numbers of drivers taking up the Dart-Tag and making use of the toll technology. Again, the consultation is unclear on the extent to which this is possible. Many of the journeys through the tunnel are daily users who no doubt would be already exploiting the discount and the fast through lanes at the booths. There is unlikely to be a significant new customer base of car traffic that would yield significant additional transfer to the Dart-Tag. A proportion of traffic, and it is possibly a high proportion given the strategic character of the crossing, uses this route intermittently, for example to travel to Stansted airport. These irregular journeys will generate no further patronage for the Dart-Tag.

There is a suggestion in the consultation that further take up might be encouraged by special Dart-Tag lanes further out on the approaches. This is probably a good way of positively discriminating in favour of tag holders but it would have the inevitable consequence of exacerbating congestion by removing some of the capacity from non-tag holders.

You may well already have received an interesting representation from the Campaign to Protect Rural England (CPRE). In that document you will see that the CPRE makes out a case for using a high speed toll system. For reasons of technology and marketing I believe that such a way forward is currently impractical. Regular traffic already has the option of a high speed alternative using the Dart-tag. Those drivers who use the crossing intermittently will not want to be inconvenienced by having to set up a payment on the web or by phone when compared to the current system of throwing a single pound coin in the collector bucket and being over and done with the transaction. For all its faults, it is far more convenient than what the CPRE describe. Those factors alone are persuasive before any consideration of the technology and the accuracy and integrity of the DVLA data-base.

In summary, ways should be found of using the existing capacity at the Dartford Crossing to best effect and that inevitably calls into question the huge delays generated by the toll plazas. I shall advise my members presently about your consultation and this officer level response and, should there be anything to add, I shall let you know as soon as possible thereafter. I hope you find these comments a useful addition to the consultation that you are currently conducting on the future charging arrangements at the Dartford Crossing.