



The Association of British Drivers

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ODA PCL Consultation
Olympic Delivery Authority
Mailpoint 23-3A
23rd Floor, One Churchill Place
London
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Via email to consultation@london2012.com

15 August 2010

Response to the Olympic Route Network (ORN) Penalty Charge Consultation

Dear Sirs,

Our comments on this consultation are as follows:

We object most strongly to the proposed penalty of £200 for any infringement. You state in the consultation document that a "higher level of compliance than average will be required in order to achieve the committed journey times". What evidence do you have for this? No such evidence is supplied.

We do not agree that the nature of the likely offences justifies a higher penalty than applies to similar offences at present. We simply do not agree that the Olympic games, which is in essence a leisure activity, has any higher priority than any other usage of the road transport network. This particularly applies to the use of the road network by most of the people who will have rights to use the ORN such as games administrators, media, games sponsors, etc.

In addition we have recently responded to a consultation by London Councils and TfL to the effect that we believe that the existing PCN levels, particularly the higher penalties of £120, are much too high anyway. They are excessive in relation to the need to ensure compliance. A flat rate figure of £25 would be more appropriate (with a minimal discount for early payment), and we argue that the same should apply to the ORN.

One particular concern about the ORN is that the measures will be temporary which means there may well be confusion about where and when the ORN restrictions apply (for example, reserved lanes).

In addition, as these measures are only temporary it seems very unlikely that the standard of signage and road markings will be to the same level as is currently in place for such restrictions as bus lanes.

The above two problems mean that there are likely to be many accidental infringements and it is totally unjust that people will be penalised with a fine of £200 for such minor offences.

So our answers to the specific Consultation Questions are as follows:

Consultation questions

Q1 Do you agree with the principle of having a single penalty charge level for contraventions of all Games-purpose TROs?

Yes

Please give your reasons: We believe a simple system that is easy to understand is best.

Q2 If you do not agree with a single penalty charge level, in what circumstances should a different penalty charge level be set?

Q3 Do you consider the penalty of £200 with a 50 per cent discount for early payment is proportionate and will have the desired effect in achieving compliance with the Games-purpose TROs?

No

Please give your reasons: It is disproportionate for the reasons give above, and morally unjustifiable.

Q4 If you do not agree with a single £200 penalty charge level, what do you consider the level should be to achieve the desired effect? Please give your reasons.

The appropriate level would be £25 with a 15% discount for early payment.

Q5 Do you agree with leaving charges for removal, storage and disposal and the release fee for wheelclamping at their present level during the Games?

Yes

Please give your reasons: We see no reason for differing charges for the Olympic Games and ORN. However, we believe these charges are already too high and should be lowered.

Yours sincerely

Roger Lawson
London Co-Ordinator

About The Association of British Drivers (ABD)

The ABD is the leading independent organisation which represents the interests of private motorists in the United Kingdom. We campaign to protect the rights of individual road users and believe that road transport is a beneficial and essential element in the UK transport infrastructure. We oppose excessive taxation of motorists and are against tolls and road usage charging. We also campaign for more enlightened road safety policies. The Association is a "not for profit" voluntary organisation which is financially supported primarily by its individual members. More information on the ABD is available from our web site at

www.freedomfordrivers.org