



# The Association of British Drivers

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Congestion Charging  
Variation Order No.3 Consultation  
PO Box 44753  
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## Submission to the Public Consultation on the Congestion Charge Variation Order No. 3

Dear Sirs,

On behalf of the Association of British Drivers (ABD) I wish to make the following comments on the above mentioned proposals.

1. Bearing in mind the number of contraventions of the Congestion Charge, which I understand are still running at about 100,000 per month, it is very clear that the vast majority of the infringements are occurring by accident or oversight. In other words, people are simply forgetting to pay, an easy mistake to make, or do not notice when they accidentally drive into the congestion charge zone.

Therefore the existing charges are already disproportionate to the nature of the infringement. To incur a charge of £50 from a simple oversight is much too severe a penalty. To raise it to £60 is simply unnecessary and will make it even less appropriate.

2. The argument being put forward by TfL is that the penalties should be brought into line with the revised penalties for moving traffic and parking contraventions where higher penalties now apply for certain offences. But the offences concerned are much more serious, are often related to road safety and are more blatant (for example obstructing a bus stop or pedestrian crossing) and there is no reason why infringing the congestion charge system should incur the same level of penalty.

3. One has to come to the conclusion that the motivation for this proposed change is to increase the revenue from penalty charges as we know that the congestion charge system would be in a very poor financial state without the revenue generated from penalty fines. Obviously the recent improvement in compliance is undermining the financial position of the system, and hence this may be more the motivation for raising the charges.

In reality, and bearing in mind the falling number of penalty fines (ie. improved compliance) reported in the latest Congestion Charge Monitoring Report, it would make more sense to reduce the level of fines as clearly compliance is improving and not getting worse.

Penalty fines should be set at levels that are adequate to ensure compliance and not be used as a way of raising revenue from accidental infringements by motorists. This is not fair and is not justice.

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](http://www.freedomfordrivers.org)