

RAC Foundation for Motoring Ltd

200 Finnieston Street
Glasgow G3 8NZ
0141 226 3305



CLASSY/30

E mail
Contact snicholson@rac.co.uk

Fax
0141 226 3101

Reference
Sn/se/200605

Date
June 28 2005

Rebecca Daddow
Scottish Executive
Roads, Policy and Group Finance
Division 2 DD
Victoria Quay
Edinburgh
EH6 6QQ

Dear Ms Daddow

Tolled Bridges Review – Phase Two Consultation RAC Foundation Response

I have pleasure in enclosing a copy of the RAC Foundation's response to the Tolled Bridges Review Phase Two Consultation.

I have also sent an electronic version of this response. If I can be of further help please do not hesitate to contact me.

Yours sincerely

Sue Nicholson
Head of Campaigns and Policy

F.A.O No.1

Motoring Issues
Research
Campaigns
Environment
Economics
Safety
Mobility

Registered Office
RAC Foundation for
Motoring Ltd
200-21 Finnieston
Glasgow G3 8NZ

Registered Charity No
247032

RAC FOUNDATION RESPONSE TO SCOTTISH EXECUTIVE CONSULTATION
TOLLED BRIDGES REVIEW – PHASE TWO

The RAC Foundation welcomes the opportunity to comment on this second phase of consultation on the Tolled Bridges Review.

The RAC Foundation for Motoring is an independent body established to protect and promote the interests of UK motorists in the fields of the environment, economics, safety and mobility. Motoring organisation RAC supports its seven million customers with breakdown cover and a wide range of other motoring solutions. The views of each organisation should not be attributed to the other.

Before going on to answer the specific questions in the consultation, the RAC Foundation would like to make the following, more general points:

Over the past 50 years a steady rise in income has given us more freedom and choice in where we live, where we study, where we work and how we want to spend our leisure time. One of the major contributors to our freedom has been the mobility provided by the motor car. However, we are now at a critical point where the resulting congestion and damage to the environment could threaten our mobility. How we balance the increasing demand for mobility based on rising prosperity with a responsible attitude to the problems that it brings is potentially the biggest challenge of the century.

Britain's transport policy in the last 50 years has achieved some targets, such as the building of the basic motorway network, but there has been insufficient investment in either roads (including bridges) or rail to provide a sound infrastructure for the future. This has been a mixture of restricted government spending and a short-term approach without a clear vision, although we have some disadvantages in transport planning such as high population densities in the central belt, long established settlement patterns and many historic buildings and streets. Not only have successive governments failed to provide sufficient capacity, they have also failed to predict how the shortfall in capacity will be met and not controlled demand accordingly.

The Scottish Executive has taken a longer-term view with plans for improvements to the roads infrastructure and public transport but there are concerns over the speed of implementation. Our conclusion is that we need to take an even longer view to ensure we have the transport system which will continue to support the growth of the economy of Scotland and mobility for the population. But the long term starts today and the problems have to be addressed with a sense of urgency now.

The demand for travel grows with growing prosperity. It will increase further as people make more journeys for more purposes and over longer distances. The car will increase its dominance with more people having driving licences and owning cars, especially among the elderly and the increasing number of young people, particularly women, learning to drive. When people have cars they will use them to make the journeys they need or want to make. So the problems arising from traffic growth – congestion and pollution – will be more urgent.

For the purposes of this discussion we have not included any assumptions about the possibilities of a reform of motoring taxation in the future as this would obviously have significant impact on the tolling regimes on one of the three bridges but instead have adopted the status quo.

Road investment is an essential component of any package to address congestion and this must also include the possibility of examining the building of a further Forth crossing. While the announcement of the confirmation of the construction of the second Kincardine Bridge was very welcome, neither it alone nor the bridge in combination with the other, equally advisable, improvements to public transport and park and ride facilities will address the problems of the next 50 years and beyond. The RAC Foundation would urge that serious and imminent consideration be given to the possibilities of another crossing.

The RAC Foundation recognises that a common approach in tolling regimes may not be appropriate for the three bridges but is convinced that some areas of strategy and policy may be applicable and beneficial if applied to all the crossings.

Question 1:

Do you think that the system for verifying Blue Badge exemptions should be changed? If so, can you suggest what these changes should be?

Individuals with physical disabilities are frequently dependent on cars for mobility and independence. For them, public transport may be inaccessible, uncomfortable or inappropriate. As such, the RAC Foundation believes that Blue Badge holders should continue to benefit from exemptions to tolls but that common procedures should be adopted to facilitate the efficient passage of vehicles of badge holders – minimising disruption and the potential of inconvenience and embarrassment to both them and other travellers. This might be by a simple registration process, which verifies qualification for those entitled to exemptions on production of documentation. Advance registration for all those qualifying for exemption would then ensure smoother passage of vehicles through tollbooths.

Question 2:

Do you consider that the exemptions for emergency service vehicles should remain limited to the Ambulance, Fire and Police Services, or should we consider extending this to cover other key services?

The RAC Foundation believes that it makes perfect sense to extend this exemption to include HM Coastguard registered vehicles. HM Coastguard is already a recognised '999' service and particularly relevant to the bridges because of the proximity to busy commercial and leisure waters.

Question 3:

Vehicles used by bridge authorities to respond to breakdowns on each bridge are exempt. Do you see a case for extending exemptions to the AA, RAC or other commercial breakdown services responding to breakdowns on the road network other than where this is the responsibility of the bridge authorities?

The RAC Foundation will leave the more fulsome coverage of this question to our colleagues in RAC PLC but believes that exemption should also be extended to certified breakdown and recovery vehicles. Breakdown rescue and recovery are emergency services provided at the roadside and as such are part of the solution to the problems of congestions rather than a contributor. Registered breakdown vehicles play a role in promoting road safety and cutting congestion by repairing and removing vehicle hazards - breakdowns occurring on the roads around a tolled bridge can have disastrous impacts on traffic congestion on the bridge itself.

Question 4:

Should public transport vehicles and multiple occupancy vehicles be considered for exemption from bridge tolls?

The RAC Foundation believes that exemptions granted to public service vehicles can only help to encourage their use and underlines the message that some vehicles are part of the overall transport solution while others may be regarded as part of the problem - public transport vehicles already benefit from exemption due to the role they play in easing congestion in existing congestion charging schemes, and under The Road User Charging (Exemption from Charges) (Scotland) Regulations. Multi occupancy vehicles should certainly be entitled to discounted tolls if not full exemption.

The RAC Foundation would favour a definition of "multi-occupancy" as driver plus one or more.

Question 5:

Should tolled bridges offer multiple crossing discounts vouchers to all bridge users, or particular classes of users such as buses or MOVs? If so why should this be?

Many drivers have little choice in the manner or timing of their crossings, often confined to travelling at peak times in order to conform with working hours or other time limited commitments. The RAC Foundation would suggest that multiple crossing discount vouchers should, however, remain available for use to mov's travelling at peak times and sov's travelling outwith those times.

Question 6:

What are your views on a common vehicle classification system for levying tolls at all Scotland's tolled bridges?

The RAC Foundation supports a common vehicle classification system for tolls at all of Scotland's tolled bridges. This would offer greater transparency to road users and mitigate against potential confusion on charges levied.

Question 7:

Should we encourage modal shift from single occupancy cars to public transport and multiple occupancy vehicles on all tolled bridges? If so, how might this be achieved?

QUESTION 8 - Do you think that raising tolls at peak times would result in less congestion at those times?

The RAC Foundation firmly supports measures to encourage modal shift and car sharing and has been active in backing such measures throughout the UK. We would favour the development of more park and ride facilities around the bridges and an exploration of the potential of "park and choose" options.

The provision and quality of bus and rail (in the case of Forth and Tay) services serving the bridges has improved enormously over recent years and we applaud the efforts of both the Executive and the operating companies in achieving those gains. More must of course be done to ensure that where economically viable and practical, services are expanded to give travellers the optimum choice of alternatives.

Bus and coach usage in Britain is however the lowest per head in the EU and is falling - so continued efforts are needed by way of attractive fare structures, through ticketing options, publicity, promotion and information on the quality, frequency, security, accessibility, comfort, convenience, ease of use and availability of services.

Long distance buses and coaches could play a part in the national transport system as they are cheap and accessible but their success depends on adequate road investment.

The cost of rail investment is, of course, much greater than that of the equivalent road investment, more difficult to carry out and the cost benefit ratio is also much lower, especially for safety - so improvements are more difficult to achieve and, in the case of the Forth Rail Bridge, limitations on bridge capacity and at Waverley Station (before improvements are undertaken) make those developments even more complicated.

We would urge the Executive and operators, however, to examine the expansion of provision and security of park and ride availability at railway stations and to look at developing traffic management systems - like the citing of more real - time information displays adjacent to the road network around the bridges - showing delays - at locations which give drivers the option of and information on transferring to public transport alternatives.

While ferries across the Forth are never going to offer a complete solution to congestion "every little helps", so the development of a ferry service between Fife and Leith is certainly worthy of development.

The RAC Foundation is still of the opinion that many drivers do not use public transport because they are unfamiliar with accessing information about timetables and schedules and are intimidated by unknown methods of travel. As much as possible, therefore, must be done to ensure that public transport services and routes are widely publicised by way of public information campaigns, web-accessibility and media coverage which disparages any negative images.

On "hearts and minds" initiatives, more work should be undertaken by the Executive to promote the advantages of teleworking (for at least some of the working week) to companies in the areas served by the bridges - along with those advocating flexible working hours and work-based car sharing schemes (research has shown that these are the most successful).

We would certainly also support the introduction of electronic tolling systems as a means of tackling congestion and improving journey times but would oppose any suggestion of the introduction of a dedicated MOV lane on the Forth Bridge because of the resultant greater congestion on the remaining lane.

The RAC Foundation would also support the suggestion of moving the toll plaza to the south side of the Tay Bridge along with improvements to the northern access ramps.

The RAC Foundation thinks that it is unlikely that raising tolls at peak times would significantly impact on congestion. Many drivers have little choice in the manner or timing of their crossings, often confined to travelling at peak times in order to conform with working hours or other time limited commitments.

They may not have the option of transferring their journey to public transport for a variety of reasons - whether that is because public transport does not offer them access to their destination, takes longer than the car, is not available at the outset or is unsuitable to them or their need to carry work items or luggage.

Instead, the RAC Foundation would favour incentivising the use of public transport and mov's – offering discounts to both and also to all those travelling outwith peak times. While there are some practical difficulties with the latter, it is worthy of further exploration and research. Suggestions that introducing such a scheme may only “extend the peak” are probably exaggerated but, in fact, there may be some merit in spreading the concentration of traffic volumes anyway.

QUESTION 9 - Should tolls reflect the impacts of different vehicle types on the need for maintenance, repair and strengthening programmes? If so, do you have suggestions for how this might be done?

Different classes of vehicle should contribute to an equitable share of the cost of wear and tear on bridges. Encouraging freight to use all roads and bridges at nighttime could help congestion.

QUESTION 10 - Do you think the current process involving Public Local Inquiries (PLIs) is appropriate for making changes to tolls or charges to meet the costs of managing, maintaining and operating a bridge?

QUESTION 11 - Do you consider that final approval by Scottish Ministers is an essential safeguard for toll/charge payers or do you think the final decision is a matter for the management authority for the bridge?

QUESTION 12 - Do you consider all tolls should be subject to increases linked to an inflation index?

While the RAC Foundation is not convinced that the use of PLI's is the best use of taxpayer's money in determining increases and takes unnecessary time, we would not necessarily support the introduction of inflation-linked increases.

Reducing congestion should be the only objective of tolling, not raising money. It should also be recognised that while traditionally, the justification for tolling bridges has been the maintenance, management and operation of the structure, motorists already contribute £42 billion to the Government by way of motoring taxation for this very purpose and only £6 billion of that is spent on roads across the UK. Charges must be set objectively and transparently, on the basis of marginal social costs and subject to scrutiny by an independent regulator and could, in theory, go down as well as up. An increase in charges should also be a signal that investment in more capacity is required. Measures must also be taken to ensure that effects on individuals and regions should be acceptable.

The RAC Foundation acknowledges that toll levels cannot necessarily be set at the same price for all bridges, but we would like a legislative cap on the level of charges that can be levied. Scottish Ministers should have final approval of changes as an essential safeguard and to ensure public trust and acceptability.

QUESTION 13 - What advantages and disadvantages do you see if any or all of the tolled bridges were to be managed by the Scottish Executive or the national transport agency?

QUESTION 14 - Should we consider transferring some or all of the powers and functions of current bridge authorities to Regional Transport Partnerships in future?

QUESTION 15 - As the Erskine Bridge functions both as a key national and strategic link for the West of Scotland as well as an important local link for communities north and south of the River Clyde, do you see any argument for de-trunking it so that it could become the responsibility of the RTP for the West of Scotland?

QUESTION 16 - Do you have any views on the advantages or disadvantages of the FETA model, for any or all of the bridges?

QUESTION 17 - Do you have any views on the advantages or disadvantages of the TRBJB model, for any or all of the bridges?

QUESTION 18 - Do you think there would be any merit in having a single body responsible for operating and managing all tolled bridges in Scotland?

QUESTION 19 - If you think all bridges should be run by one body what form, powers and functions should this body have?

QUESTION 20 - Are there any other management options that you would like to suggest?

Management of Scotland's tolled bridges – General comments

It is the RAC Foundation's opinion that a single authority or agency would, long-term, be the most effective way to manage the strategy and over-arching policy of tolled bridges. Each of the three tolled bridges connects strategically important areas and routes. Currently only one of them is trunked, but as they form an integral and economically vital part of Scotland's strategic road network, consideration should be given to bringing the other two within the trunk road system also.

The most appropriate body to undertake this would be the new National Transport Agency. As the Agency will also be responsible for the trunk road system, for rail and public transport infrastructure, it would make sense to bring the bridges under this umbrella too and hopefully ensure the kind of "joined up transport" that Scotland has been lacking so far.

This would enable the development and implementation of a common set of policies, applicable to all tolled bridges in Scotland, which would safeguard the confidence of the customer – the toll paying road user. This agency would focus on consistency in toll regimes as well as undertaking such tasks as facilitating the establishment of a central body for registering for exemptions and devising a common vehicle classification scheme.

We welcome the Executive's suggestion that consistency of approach could be applied, in certain elements, to Scotland's tolled bridges. We believe a piecemeal approach with different exemptions, discount schemes and different methods of payment would add confusion for the motorist and put a significant administrative burden on business. Systems should be fair and easy to use to encourage different driving patterns and, where possible, divert drivers to other means of transport.

It is absolutely vital however that the agency should work in partnership with the Regional Transport Partnerships and local authorities, to ensure that the impact of any decision on local communities, businesses and stakeholders is fully recognised. It may be that RTP's may take the role of implementing and delivering integrated transport projects at a regional level.

The RAC Foundation does have some reservations about the joint board model because of the often-conflicting views of constituent councils.

The National Transport Agency model, working closely with local authorities, would also be able to look at wider issues which affect tolled bridges such as land use planning. The relationship between the two is interactive and the location of housing, shopping, leisure and workplace development has had direct impacts on the demand for use at the bridges.