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Your Ref:
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30th June, 2005

Dear Ms. Daddow

Tolled Bridges Review - Phase Two Consultation

I enclose a report which was approved by the Forth Estuary Transport Authority as its response to the consultation paper.

Yours sincerely



Iain L. Grant,
Clerk.

Enc.



Forth Estuary Transport Authority

Tolled Bridges Review - Phase Two Consultation

27 June 2005

1 Purpose of report

- 1.1 To propose a response to the Scottish Executive's consultation document "Tolled Bridges Review - Phase two consultation".

2 Introduction

- 2.1 The first phase of the review of Scotland's tolled bridges was completed in November last year. Phase two examines broader issues relating to the management, operation and maintenance of the tolled bridges. Responses to the phase two consultation document are to be submitted by Friday 8 July 2005.

3 Main Report

- 3.1 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?*

Response 1 - The audit of all toll systems requires to be robust and secure, particularly when dealing with large sums of cash. The rate of growth for Blue Badge exemptions during the period 1994-2004 was the highest growth of all classes of traffic at 50%. This compares to car growth of 21%. During 2004, over 185,000 vehicles were exempt from tolls. Whilst this represents only 1.5% of all traffic it is a significant number of vehicles. All vehicles passing through the tollbooth require to present either cash or a voucher to enable an audit check on the tollbooth transactions. At present, Blue Badge holders are encouraged to pre-register with Forth (or Tay) and receive a supply of vouchers. The voucher can be completed in advance of the journey and presented to the toll officer with a valid Blue Badge for verification. The vouchers are interchangeable with the Tay Road Bridge. Occasional Blue Badge users are required to complete a voucher at the booth. The serious issue of Blue Badge misuse and fraud has been highlighted through such reports as the Dft's Blue Badge Scheme Discussion Paper which stated the "the major concern to all participants is the abuse and misuse of the scheme, which is perceived to be undermining it". One possible improvement would be a barcode on the badge, which could be read at the tollbooth to verify the authenticity of the holder.

It is not proposed that exempt vehicles be issued with electronic payment tags which are being procured with the introduction of electronic tolls as, since the tag equipped vehicle would not be required to stop, there could be no check carried out on the validity of the exemption.

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.

Response 2 - For the reasons mentioned in response 1, the number of exemptions should be kept to a minimum and not extended beyond those listed in the Road User Charging (Exemption from Charges) (Scotland) Regulations 2004.

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 breakdown on the road network other than where this is the responsibility of the bridge authorities?

Response 3 - With the volume of vehicles now using the Forth Road Bridge, it is crucial that breakdowns are removed as quickly as possible. For that reason it is not acceptable for a driver to call up a private recovery company whose nearest recovery vehicle may be some distance away and held up in the queue caused by the breakdown. For this reason FETA maintains its own 3.5 tonne capacity recovery vehicles and removes breakdowns from the bridge at no expense to the owner. This is consistent with Transport Policy no.9 of FETA's LTS. (Breakdowns are predominantly in the class of vehicle below 3.5 tonnes gross, which represents over 90% of all vehicles. FETA employs specialist commercial recovery firms for heavy goods vehicles). Since FETA recovers breakdowns on the bridge, there is no case for private, for-profit recovery services to be exempt from tolls on the Forth Road Bridge.

Question 4 - Should public transport vehicles and multiple occupancy vehicles be considered for exemption from bridge tolls?

Response 4 - To encourage a movement away from car use, public transport requires to be made more attractive and cheaper. In line with LTS Transport Policy no. 5 FETA believes that registered public transport vehicles should be exempt from tolls (current toll income from all buses is £106,000). As multi-occupant vehicles (MOV's) could be defined as containing the driver plus one it is proposed that MOV's receive a discount when compared to single occupant vehicles (SOV).

Question 5 - Should tolled bridges offer multiple crossing discount vouchers to all bridge users, or particular classes of users such as buses or multiple occupancy vehicles? If so, why should this be?

Response 5 – The cost of operating the discount voucher scheme on the Forth Road Bridge is estimated to be around £600,000 per annum including £500,000 in loss of toll income and £100,000 in staff, printing and postage costs.

The scheme, which effectively rewards frequent users is inconsistent with FETA's Transport Policies TP4 (to reduce road traffic congestion), TP 5 (to increase the use of public transport) and TP 8 (more fairly reflect the impacts of different users on the fabric of the bridge). Almost 50% of the traffic load on the bridge is delivered by 6% of the traffic. The bridge surfacing is now lasting only 9 years compared to 25 years mainly due to heavy goods vehicles and yet the discounted toll for a heavy goods vehicle is less than the toll for a scheduled public service bus. FETA believes that in order meet the policy objectives in its LTS, the discount scheme should be withdrawn. As described in response 4, MOV's would pay a reduced differential toll compared to a SOV. This toll would be paid electronically or manually without the use of vouchers.

Question 6 - What are your views on a common vehicle classification system for levying tolls at all Scotland's tolled bridges?

Response 6 - There is a long term desire within Europe to introduce Interoperability of tolling facilities within member states ultimately leading to a single billing for a cross boundary journey. Unfortunately at this time there is not even a common method employed to differentiate the differing vehicle classes and each country tends to adopt its own methods. For example France generally classifies by means of a combination of maximum vehicle height and number of axles. Spain uses the height of the vehicle above its front axle plus number of axles. Even within the UK we have a mixture of differing classification methods based on gross vehicle weight (e.g. Forth and Tay) and height above the front axle (M6toll). With the introduction of electronic tolling systems employing automatic vehicle classification it is essential that the vehicle is classified using parameters which can be accurately measured electronically. This tends to favour a system based on height and number of axles. Since M6toll has employed a system based on the Spanish standard it is considered appropriate that this precedent be adopted throughout the UK.

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?

Response 7 - The conclusion reached in the LTS was that central Edinburgh is well served by bus and rail but that other destinations are not well served from Fife. To facilitate a movement away from car use there should be a strong emphasis on targeting public transport enhancement on key corridors to those other employment areas south of the Forth. This would improve the opportunities for mode change to public transport for cross-Forth travellers. Public transport improvements can be supported by a reduction in car occupancy through car sharing or park & choose which offer added benefits and flexibility to travellers. Differential charging can help achieve a reduction in

single occupancy vehicles and at the same time contribute to funding a programme of improvements.

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

Response 8 - The SESTRAN Integrated Corridor Study (SITCoS) proved a link between increased tolls and reduction in single occupancy vehicles which would result in a reduced period of congestion.

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?

Response 9 - The Forth Road Bridge was designed for 22-ton vehicles. The permissible weight of hgv's has steadily risen over the years to 44 tonnes. However the most significant effect on the steel bridge deck is the use of the "super-single" high-pressure single wheels on trailer units. This concentrated load results in more flexure of the deck plate and premature failure of surfacing. The original surfacing lasted 25 years compared with 9 years now. On a typical day, the bridge carries a total of 180,000 tonnes with half of that load derived from vehicles exceeding 7.5 tonne. FETA believes that the charging structure should more fairly reflect the impacts of different users on the fabric of the bridge and the consequential maintenance and strengthening programmes (Transport Policy 8). Introducing a graduated toll for the heavier vehicles based on their gross carrying capacity would effect this. As in response number 6, the classification could be related to the height of the vehicle above its first axle and the number of axles.

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

Response 10 - The recent PLI held into FETA's application last year for a 20p increase was caused by a single objector and resulted in significant cost and loss of income for maintenance works during the process. Future charging schemes should have an inflation-linked increase built in to the order.

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?

Response 11 - Should significant toll increases above inflationary increases be required due to special circumstances, Scottish Ministers should be able to consider approval following consideration of the specific case. These increases could be notified by public notice but not automatically require a full PLI.

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

Response 12 - All of the major tolled bridges requires an on-going maintenance commitment and the annual cost of maintenance and operation rises in line with inflation. If tolls are to remain as the source of income then it follows that the toll should be index linked. Examples in England of index linked tolls are Humber and Severn bridges. In addition to providing revenue for maintenance, index linking reduces the growing differential between the true cost of motoring and the rising cost of public transport.

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?*

Response 13 - FETA believes in local accountability which would be removed if the Executive managed the Forth and Tay bridges. The boards consist of locally elected councillors and meetings are held in public. In addition, if these bridges were under the Executive's control, this would remove the capacity for either bridge authority to argue independently, eg for a new Multi-Modal Crossing at Queensferry. Further, FETA believes it is in a better position than any national body to ensure that public transport improvements are best matched to local needs.

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

Response 14 - **Regional** Partnerships will require some time to become effective and it is too early to decide if they will take on an operational role.

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?*

Response 15 - FETA does not have enough knowledge of the particular issues facing Erskine bridge to make comment.

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

Response 16 - A major concern of the previous Joint Board was that the widening of FETA's remit could lead to a reduction in funding for bridge maintenance as has been experienced in some American transport authorities which have responsibility for bridges. The 2002 FETA Order addressed this concern by making bridge maintenance a statutory responsibility. The key to FETA's success is the additional discretionary powers to invest in cross-Forth transport improvements.