

Response from South East Scotland Transport Partnership



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**SESTRAN's Response To The Scottish Executive On The
Tolled Bridges Review - Phase 2 Consultation**

List of Questions from the Consultation Document

Exemptions for Disabled Drivers/Blue Badge Holders/Emergency Vehicles

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 – Blue Badge verification is an administration matter for each bridge management and therefore these organisations would be best placed to answer this question.

However, the Blue Badge exemption only applies when the holder of the Blue Badge is in the vehicle. The process could probably be made more efficient if the badge held user details in the form of a bar code, but this would require national agreement.

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 – It would be prudent to include the Coastguard in the exemptions for emergency service vehicles, especially since the bridges are on estuarial crossings.

With the Transport (Scotland) Act 2001, The Road User Charging (Exemption from Charges) (Scotland) Regulations 2004, came into force on the 23 December 2004, which gives exemptions to Fire Services, Police, Ambulance, Coastguard, vehicles displaying disabled badges and public service vehicles.

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?

Response 3 – No, since the AA, RAC and other breakdown companies are offering services which their member/users pay for. They are also companies which require to make a profit. If you start to give discounts to certain private companies then where do you draw the line?

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

Response 4 – Registered public service vehicles that regularly cross the bridges should be exempt from the toll. This approach would be consistent with the Scottish Executive's ambition to stabilise road traffic volumes at 2001 levels by 2021.

Coaches and taxis should not be exempt as they pass over the bridges in an ad hoc manner. MOV's should still be charged a toll, but with a discount as part of a differential tolling structure, rather than being totally exempt. Whilst carrying passengers, taxis would be eligible to use MOV lanes and would benefit from any advantages for MOV's under a differential tolling system. Whilst coaches still offer an efficient use of road space, it could be difficult to distinguish between some buses and coaches, particularly those from abroad. In light of this, it is suggested that until a satisfactory method of dealing with irregular coaches could be devised, only registered bus service vehicles should be exempt, in order to minimize operational difficulties with toll collection.

Discount Schemes

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 – This question should be considered in conjunction with the use of electronic tags/smartcards. In principal, registered public service vehicles whose route crosses the bridge should be exempt, as described in the response to Q4.

However offering discounts to regular users will not encourage modal shift, and indeed could work against it. In this respect we understand that multiple crossing discount vouchers are not available at the M6 toll, Dartford Tunnel or Severn Crossing.

Classification of Vehicles

QUESTION 6 – What are your views on a common vehicle classification system for levying tolls at all Scotland’s tolled bridges?

Response 6 – Tolling classification should be standard for all bridges.

If you are moving to a standardisation of Scottish toll bridges, then consideration should be given to other tolling bridges throughout the whole of the UK. Even the European HGV Road User Charging (RUC) scheme classification should be considered, since it is a clear indication of what is likely in the future. With the introduction of the Superfast Ferry at Rosyth 3 years ago, there must be more foreign drivers and vehicles using the Forth Road Bridge, and hence any new tolling classification system should reflect European systems in this respect.

Consideration of existing technology and associated vehicle classifications used elsewhere within the UK, with regard to whether these could be used in Scotland, could be helpful, (eg Dartag, Severn TAG).

Reducing Traffic and Congestion on Tolled Bridges

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 – Yes, it is important to reduce congestion, reduce the amount of traffic growth year on year, and to try to aim for the Scottish Executive’s target of stabilising road traffic volumes at 2001 levels by 2021. However, it must be stressed that encouraging modal shift from single occupancy cars to public transport and multiple occupancy vehicles on all tolled bridges will only cover a very small part of the strategic road network. To be meaningful, such measures need to apply to the whole of the strategic road network, and so the medium to long term future management of tolled bridges needs to be considered in the context of any future National Road User Charging Scheme, that might follow from the UK Government’s current investigations into this subject.

In the shorter term, ways of achieving the desired modal shift on tolled bridges include:-

Direct measures

- Differential tolling depending on time of day
- 2 way tolling, thereby charging those vehicles which are causing the congestion, at the time that they are causing it

Indirect measures

- Education and publicity, highlighting the adverse impacts that the increasing amount of traffic has on the economy and the environment, showing that public transport usage (rather than driving) creates time for other activity such as working on trains with computer link ups and power sockets, and improving information of the times and frequencies of public transport
- Construction and expansion of Park & Choose sites (Park & Choose is a combination of bus P&R, rail P&R and car sharing to maximize the flexibility and choice of travel mode for outgoing and return trips)
- Development of carshare clubs/websites/registration 'bureaus'
- Reduction in public transport fares with higher usage
- Improved interchange facilities where you can choose which mode of transport to continue your journey by
- Improved public transport access to where people work especially if it is shift working
- Improved access to all public transport modes with full DDA (Disability Discrimination Act 1995) compliance to allow access for all

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

Response 8 – Yes, but to make a significant reduction the tolling levels would have to be raised substantially, (as demonstrated by the SESTRAN Integrated Transport Corridors Study), which may be unacceptable politically and on economic grounds. For differential tolling to be fully effective, tolls would have to be charged in both directions to deal with the returning peak flows. This would require a return to 2 way tolling at both the Forth and Tay Road Bridges, which would require an appraisal of the benefits against the costs of providing new plazas.

The key issue is that you are trying to help with social inclusion and the economic benefit for all person trips to cities such as Dundee and Edinburgh to employment, education, etc. However you are trying to get them there by as sustainable a mode as possible, and in particular you are trying to reduce vehicle trips rather than people trips going to these destinations. Most car trips are not to Edinburgh City (ie not always good public transport or car share options to their destinations).

Ease of use of public transport (as an alternative) is a major factor, with seamless interchange, no or very few delays/cancellations, with high enough public transport frequencies to ensure that if one bus or train is delayed there will be another service along within a few minutes.

Used in conjunction with improved travel choices, higher tolls at peak times would encourage modal shift, achieving higher public transport usage and car sharing leading to a reduction in SOV's (single occupancy vehicles) and an increase in HOV's (high occupancy vehicles).

Depending on how the increased income from higher tolls was reinvested, you could improve public transport with more efficient interchange facilities, Park & Choose sites, reduced public transport fares, direct bus services to employment sites, HOV lanes, etc.

Tolls Reflecting Cost of Wear and Tear

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 – Yes, HGV's (Heavy Goods Vehicles) should pay larger tolls, as the wear and tear caused on the bridges by these vehicles is more significant than by other modes of transport, and leads to increased roadworks and consequent congestion and delays for all travellers. However, a balance would need to be struck in light of the benefits they bring to the wider economy, in terms of delivering goods, and of course the wider policy aims to transfer as much freight as possible to sea, rail and other more sustainable modes.

Procedure for Changing Tolls or Charges

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?

Response 10 – We live in a democracy, whereby everyone should have a right to have their say on toll increases and the affect it would have to them. However, PLIs are a very costly event for all parties.

Is there not a way of dealing with objections in a structured manner? That is to say that the Bridge Manager would write to objectors seeking the withdrawal of their objections. This could be followed by face to face discussions if necessary,

and then if still not withdrawn, the objection would be referred to the Bridge Board for a final decision. Any appeals could be referred to the Scottish Executive.

Future tolling increases could also be written into the Bridge Tolling Orders, which could be a percentage increase, ie if you are only going to raise the tolls by a maximum of X% over a period of Y years you do not need to carry out a PLI, but just advertise in the press and in advance of the increase for a period of 4 weeks.

Another option could be an inflation adjustment whenever relevant; if beyond 'accumulated inflation' PLI should be held.

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 – Tolls affect more than the surrounding Local Authority constituents and they are part of the key strategic road network, therefore to allow democracy to be upheld any final appeal should be with the Scottish Executive. Thereby if the Scottish Executive do not agree with the toll rise then they will need to assist in finding the resources to meet the management, maintenance and operation of the bridges.

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

Response 12 – In setting the level of tolls to manage the demand for travel by alternative modes, it could be difficult to maintain a link to the inflation index. Setting tolling levels in relation to the inflation index could also lead to “awkward” tolling levels if applied annually, producing difficulties with cash collection at the toll booths, and consequent delays for drivers. This would be simplified by applying accumulated inflation increases at less frequent intervals. Furthermore, such problems would not arise with the use of electronic systems such as tags and smartcards.

Executive/Transport Agency

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 – For the most heavily trafficked strategic routes this could make sense (ie. Forth Road Bridge) but it may be slightly less appropriate for the

Erskine Bridge or the Tay Road Bridge, in light of the lower levels of traffic and the greater proportion of local trips. However, all tolled bridges appear to be on the strategic road network with the trunk road network either on the approaches to the bridges or at least close to them, so it could be argued that the Scottish Executive should, at the very least, accept a degree of responsibility for each bridge.

However, in light of the varying mix of local, regional and national traffic on each bridge, and the particular need to develop and implement alternatives to single occupancy commuter trips in order to tackle traffic growth during the main congested peak periods, the current bridge boards/authorities and their constituent local authorities are probably better placed to deliver appropriate solutions than those at the national level.

Regional Transport Partnerships

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 – SESTRAN may be interested in moving towards incorporating FETA’s responsibilities in the medium to long term, but until the new statutory South East Regional Transport Partnership has also considered whether it should move towards “model 3”, it would be premature for the new RTP to take on board all the operational functions and maintenance liabilities of FETA.

The Tay Road Bridge is located on the boundary of the proposed “South East” and “Central and Tay” Transport Partnerships, and so transferring the powers and functions of the current bridge authority to the RTP level would not be straightforward. With over 80% of trips across the Tay having an origin or destination in Fife and Dundee (refer to Tolled Bridges Review Phase 1 Report) a regional emphasis on the Tay is questionable. SESTRAN would therefore suggest that the Tay Road Bridge should continue as a board made up of appropriate constituent Councils, but with “FETA” type powers to enable reinvestment of tolls in more sustainable forms of transport.

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 – No response, since outwith SESTRAN’s remit. It would be more fitting for WESTRANS to respond to this. Although if it is intended to apply

constancy to all the toll bridges, it would seem reasonable to deal with them all in the same way.

Joint Board (FETA Model)

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 – FETA has been very active in its relatively short existence. It has financially supported major schemes like the Ferrytoll Park & Ride and its recent expansion, as well as major feasibility studies such as the SESTRAN Integrated Transport Corridors Study, and the Cross Forth Passenger Ferry. FETA has, of course benefited from being a member of the current voluntary SESTRAN partnership, but this will not be the case under the new statutory RTP. With FETA being likely to continue to exist in parallel with the new RTP, a mechanism will be required to involve the Authority in the RTP’s role.

The Tay Road Bridge Joint Board has already started to involve itself in the development of solutions which are currently out with its remit, and would therefore benefit greatly from an expansion of its role to include “FETA” type functions and powers.

Joint Board (TRBJB)

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

Response 17 – The TRBJB model is too restrictive if the overall aim is to encourage modal shift from single occupancy cars to public transport and multiple occupancy vehicles on all tolled bridges. Despite the lower levels of congestion at this bridge, compared with the Forth, continuing traffic growth means that the TRBJB needs to be replaced as soon as possible with a means of reinvesting revenues raised from tolls in more sustainable travel choices for travellers. The TRBJB has already started to develop proposals for measures to encourage people to travel more sustainably.

Single Tolled Bridges Authority

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?

Response 18 – This would give one joint approach on managing all bridges and traffic, and could lead to some small savings in management costs. However, the vast majority of staff would still require to be based at each bridge, in order to maintain a satisfactory operational and maintenance role. See also response to Q13. With Fife being dependant on 2 out of the 3 tolled bridges, it would appear reasonable for Fife and its adjacent Councils to have a greater say in the future management of these bridges, rather than a National Tolled Bridges Authority, particularly since proposals for more sustainable travel will need to be developed at the local/regional level.

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

Response 19 – See responses to Q13 and Q18.

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

Response 20 – Only to take the opportunity to reinforce the issue about the role of tolls on the 3 bridges, in the context of a future National Congestion Charging Scheme. There is a clear issue of equity from the “consumer’s” point of view, between travel on the tolled bridges and the rest of the strategic road network and these issues should therefore be linked and considered together.