

Response from The Scottish Region of the Chartered Institute of Logistics and Transport

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## TOLLED BRIDGES REVIEW: PHASE TWO CONSULTATION

### **The Scottish Policy Group of The Scottish Region of the Chartered Institute of Logistics and Transport (UK)**

#### **Introduction**

The Institute is the professional body for the full range of people who are engaged in logistics and transport. This includes freight and passenger transport operators, government and local government employees, consultants and academics. The views expressed in this paper reflect those received from members of our Policy Group who have contributed.

This response considers general issues of principle initially, before responding to the individual questions posed in the consultation document.

#### **General points**

The Review of Tolled Bridges is set in the context of the wide-ranging proposals from the Executive to achieve a more strategic approach to delivery of transport. The outcome of the wider changes is still unclear, as the form of both the national transport agency and the regional partnerships is still not finalised. In December 2003 we submitted a response to the consultation 'Proposals for 'A New Approach to Transport in Scotland' and in this we expressed views on the formation of the National Transport Agency and in January 2005 we commented on the 'Proposals for Statutory Regional Transport Partnerships'. We would recommend that you review these in relation to our present observations on Tolled Bridges and the related functions of these bodies.

The three tolled bridges dealt with in the review have a common factor, in that they are key links in the national strategic road network, as well as performing essential local and regional functions. They cannot therefore be managed in isolation from regional and national transport policy considerations

In considering the future of the tolled bridges there are two key aspects:

- The policy framework for their management, including accountability; and
- The operational regime for delivery in line with policy objectives.

The first of these will need to deal both with the wide transport planning context, as well as accountability for prudent financial and operational management. It is our view that **the transport planning context for the bridges cannot be separated from wider land use and transport strategy (including trunk roads)**. This response will therefore include views on these wider issues.

Given the key role of the bridges in the transport network, it is difficult to provide views on their management before the wider national transport management framework is known. It is our view therefore that **immediate issues identified in paras 24 and 25 of the consultation document for the Erskine and Forth Bridges should be dealt with on a short term basis by the further extension of existing arrangements**, and that final decisions on management of the tolled bridges should await the establishment of the regional transport partnerships and the definition of their role in relation to trunk roads in particular. Once these decisions are taken, responsibility should transfer to the Regional Transport Partnerships.

In this context, we are surprised that issues relating to demand management on the bridges (paras 53 to 57) are mixed with matters that are primarily operational in nature in the remainder of Part 2 of the document. We consider that demand management in particular raises very wide ranging questions, which we deal with in our response to Question 7, below. We are a little surprised that previous work done in this area eg as documented in the JATES studies and Setting Forth appear not to have been taken into account. Although these go back to the late 80's we feel that they may still have relevance and that an assessment should be made of how new studies relate to these earlier analyses.

(Reference <http://www.bopcris.ac.uk/bopall/ref23587.html> may assist).

## Response to Questions

**Q1** There are major problems surrounding abuse of Blue Badges. **Change is needed; ideally a separate facility for verification is required which should ensure that other road users are not delayed by these transactions. It is desirable to have a common approach for all three bridges.**

**Q2** **There should not be any exemptions beyond existing emergency services, including Coastguard.** The principle should be to minimise exemptions – there will always be substantial groups of users who will consider that they are 'special cases' and should not have to pay. This should be resisted or there will be an unfair burden on remaining users and charges imposed for policy reasons will be reduced in effectiveness.

**Q3** In the context of the response to Q2, there seems to be **no special reason for an exemption for breakdown vehicles not involved with breakdowns on the bridge itself.**

**Q4** Ministers have already made a policy decision to exempt buses under road user charging regulations; the justification for this applies to the toll bridges as much as to urban charging schemes. **Registered local bus services should be exempt as under Road User Charging regulations.** However, there seems **no reason to exempt other multiple occupancy vehicles** – although a different toll level to single occupant vehicles may be appropriate in certain cases (see Q7).

**Q5** **A small discount MAY be appropriate in certain circumstances to reflect administrative savings from multiple sales.** This should not however be at a level that provides an incentive to make additional journeys.

**Q6** A common classification system based on vehicle characteristics would assist users travelling widely within the country. It would however be inappropriate to extend this to vehicle occupants, for example, where classifications may need to be determined by local policy objectives.

**Q7** This question cannot be answered by reference to the bridges alone. In principle we agree with the points made but achieving these objectives are much more complex than indicated. Overall travel behaviour is more volatile and changeable than implied by a narrow representation of mode choice change within a single corridor. Limiting the demand for car travel and growing the market for public transport travel are much more independent concepts than implied by the concept of modal shift - at least within narrow corridors such as bridges. Sustainable changes will only be achieved if "push" and "pull" measures are planned to work together and likely impacts will be over networks and lifestyles rather than narrow corridors and modes. Differential tolls by occupancy and time of day may be part of such a strategy, but cannot be considered in isolation.

The longer term responses to toll changes on bridges are as likely to be on land uses and lifestyles as on direct substitution of car trips by public transport or vice versa. More particularly if changes in tolls can be planned within the context of the wider road and public transport network development policy then a substantial contribution could be made to sustainable development. This implies that transport policy (including for trunk roads) and development policy need to be closely linked. To achieve this, the economic and location impacts of any change should be assessed under the STAG framework. This should consider both short and long term responses. **It is therefore crucial that decisions relating to demand management are taken by authorities responsible for transport and land use strategy over a wider area than simply the bridge itself.**

**Q8** Basic economics suggest that if price is raised, travel demand will drop. **Toll increases, depending on the level of change should assist in reducing congestion.** However, evidence suggests that there is little demand elasticity – quite substantial price increases may be required to have a significant effect on congestion.

**Q9** It is appropriate that the vehicles causing the most damage to the road surface should pay more towards its maintenance. However, it may not be realistic for this to be directly related to the appropriate power of axle weight. From a policy point of view, goods vehicles are making an important contribution to the economy; and from a practical point of view, this would imply a requirement to weigh each vehicle, which is unlikely to be feasible in a toll plaza context. However, **it is reasonable for tolls/charges to take into account the contribution to wear and tear through the vehicle classification system.** When considering this and in determining the charges to be levied, account should be taken of the societal benefits accruing from the services being provided.

**Q10** Different rules are in place for toll bridge schemes and road user charges introduced under the Transport (Scotland) Act 2001. In the former case, a PLI is required in case of one or more objections to a change to tolls. This is not

appropriate, and it would be preferable to adopt the approach of the road user charging legislation, which empowers, but does not require, an inquiry to be held following consultation. **It should be for the charging authority and Ministers to determine whether an inquiry is appropriate.**

**Q11 Ministerial confirmation is an appropriate safeguard**, as would be required in any case under the road user charging legislation. However it is important that the decision-making process and degree of scrutiny and evidence required is tailored to the scale of change proposed.

**Q12** Road user charging legislation includes a provision for a scheme to include charge increases relating to changes in RPI. **This should also apply to toll rates.** Periodic reviews and increases should be subject to confirmation by Ministers and altered at fixed periods.

**Para 60** The management of tolled bridges requires to be considered within the context not only of the other Scottish bridges but also other tolled bridges and roads in the UK, the government's Lorry Road User Charging proposals and other urban congestion charging schemes. It also needs to take into account potential severance issues – for example Health Board boundaries – as well as wider land use issues as discussed in the response to Q7.

**Q13** The advantage of a national approach would be to provide a consistent approach to network management on these key links in the strategic road network. However, this would substantially be outweighed by the difficulty in ensuring their management in a coherent and integrated regional transport context allowing policy co-ordination with other modes and the local road network. **A national approach is therefore not recommended, although the benefits of a common approach to toll collection should be taken into account.**

**Q14** The arguments put forward above **strongly support transferring all powers for tolled bridges to Regional Transport Partnerships.** However, for this to be effective RTPs should also have some say over the trunk road network in their areas. Day to day management of the bridges could rest with a Bridge Manager responsible for maintenance, operational management and toll collection. This task could potentially be contracted out.

**Q15** **If tolls are maintained on the Erskine Bridge, it would be appropriate for responsibility for it to pass to the RTP** for the reasons given in the previous response, ensuring that tolls are set in an appropriate social context. However, if tolls are removed, there is no reason to treat it any differently from the rest of the trunk road network. In view of the financial situation of this bridge and taking account of travel patterns, there may indeed be merit in removing tolls altogether. An appropriate time could be following completion of the M74 extension, with a view to reducing through traffic congestion.

**Q16** FETA's responsibilities and structure are not dissimilar to those of an RTP. As consistently argued, this range of responsibility is needed for the tolled bridges to ensure that tolls/charges are set in an appropriate regional policy context. This applies equally to all the tolled bridges, although the degree of active management

required may be different in each case. For Forth and Erskine, it would seem unnecessary and possibly counter-productive duplication to have separate transport authorities at the regional and cross-river levels and **the responsibility should lie with the RTP**. There is a problem for Tay in that it is on the boundary of two proposed RTPs, so a joint structure of some kind may be needed here.

**Q17 The TRBJB approach now seems inappropriate** for the management of a major transport link. There is a need for the bridge management to be able to consider multi-modal and wider issues, even if these are not always used.

**Q18/Q19 An independent single body has the disadvantages of management by the Scottish Executive/NTA without any of the advantages.** It cannot reflect the close involvement that will be needed with local and regional roads and transport authorities to ensure the bridges are managed as an integral part of the overall transport system. As indicated already, there would however be merit in a common system of toll collection

**Q20** No further management proposals relating directly to the bridges are suggested. However, there is an opportunity arising from these changes for the updating of tolling technology and with the possible introduction of lorry road user charging, to consider ways of simplifying payment systems for regular toll payers. There is a need for a form of 'clearing house' that would allow payments of these various charges to be combined into a single billing process, or a single pre-payment unit. Ideally, such an arrangement should operate at a UK or European level and the Executive needs to consider how the tolls/charges levied in Scotland would be incorporated into it.