

CITY DEVELOPMENT
TRANSPORT

CONS34/33

Rebecca Daddow
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Date: 22 June 2005
Your Ref:
Our Ref: R3.2

Dear Ms Daddow

REVIEW OF TOLLED BRIDGES; PHASE 2
SCOTTISH EXECUTIVE CONSULTATION

Thank you for your invitation to comment on this matter. Please find below comments from the City of Edinburgh Council, approved by the Executive of the Council on 7 June.

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?

As the Blue Badge is a national permit, there is a strong case for a common system across all three Tolled Bridges. This should be as convenient as possible consistent with security. It would appear from paragraph 38 that the system used by FETA most closely matches these requirements.

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?

Consistency with The Road User Charging (Exemption from Charges) (Scotland) Regulations would facilitate clarity and understanding. This would include ambulance, fire, police and coastguard services, vehicles displaying a blue badge, and public service vehicles. For the avoidance of doubt, this should include buses. Vehicles used for bridge operation and maintenance should also be exempt, for practical reasons. There may be a case for very limited additional local exemptions to reflect very local circumstances, but in general the presumption should be against further exemptions.

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?

There would be a significant difference between a charging scheme covering a large geographical area, where it was expected that current breakdown arrangements would continue, and a tolled bridge, where a broken down vehicle can be quickly located and attended to. For this reason, we see no reason to extend breakdown vehicles exemption beyond vehicles used by the bridge authorities.



Edinburgh: World Heritage City

ANDREW M HOLMES
DIRECTOR

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

We do not believe that there is a case for exemptions beyond those described in the reply on Question 2, noting again that public service vehicles should be exempted. As circumstances at each bridge are different, the priority given to multiple occupancy vehicles should be determined locally, which can be reflected in differential tolling. A universal exemption would remove this tool, which is an essential component of managing traffic and operations at each bridge. Exemption is not the right tool for addressing multiple-occupancy vehicles; instead, discounted tolls may be appropriate, but should be determined at the local level.

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?

Again circumstances at each bridge are different; therefore should be determined locally. However, the general need to reduce traffic congestion would suggest a general presumption that any scheme should be compatible with this objective. There is no policy reason for offering a multi-trip discount for single-occupancy vehicles. Thus, the current situation at the Forth Road Bridge where buses cannot get discounted tickets, whilst regular Single Occupancy Vehicles can, should be eliminated. However, if our response to Questions 2 and 4 is accepted and in consequence public service vehicles are exempted, this issue is partly resolved.

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

For similar reasons to those set out in response to Questions 1 and 2 (consistency, convenience, clarity and understanding), we would support a common vehicle classification system.

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?

Promoting the use of higher occupancy vehicles, particularly buses, should be a common objective, as it most clearly matches the national policy objectives. There are a variety of tools available, including differential tolling and the appropriate allocation of roadspace on bridges and/or their approaches. How these are deployed may vary depending on the circumstances applying at each bridge.

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

There is a clearly demonstrated relationship between price and congestion. This has also been demonstrated in London and other cities. The extent to which higher peak period tolls will result in lower congestion depends on price and the availability of alternatives.

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?

At one level it is logical for tolls to reflect the maintenance costs they impose. However, closer consideration reveals that the types of vehicle which would incur the highest charges are those vehicles which for other reasons might warrant the opposite; for example freight, or buses. Conversely the type of use which represents the least efficient use of a bridge in transport, economic and environmental terms (the regular single occupant vehicle) incurs the lowest charge.

We do not believe that a common position is needed on all three bridges; and if it were, we would suggest that charges reflecting maintenance cost should not necessarily take precedence over other factors, for the reasons set out above.

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?

In the light of recent experience on the Forth Road Bridge, where one objection triggered a public inquiry, there is a persuasive case that the current system is inappropriate. Neither do we accept the view that human or democratic rights would be infringed if the public inquiry process was not employed. The public inquiry process itself can inhibit many potential objectors from effectively exercising their rights.

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?

Some safeguard or appeal process should be in place, whether that comprises Ministers or an independent body. Furthermore, the existence of such a process does, or would, further diminish the case for a full public inquiry process.

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

Use of tolls as a mechanism for managing demand (or for other purposes) would require that increases are not linked to inflation. However, it should be noted that historically tolls increases have lagged behind inflation. In the long term this creates other problems: for example when tolls no longer reflect total transport costs.

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?

We consider that the advantages and disadvantages are adequately set out in the document. On balance we would not support this approach because we consider that generally the FETA model has much to commend it. Furthermore, since FETA has only recently been established, we believe it would be premature and disruptive to undergo another reorganisation.

On balance we believe that the benefits of common management would be outweighed by the loss of local understanding and decision-making.

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

We consider that the advantages and disadvantages are adequately set out in the document. On balance we would not support this approach for the reasons set out in response to Question 13 above.

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?

We have no comment on this matter.

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

We consider that generally the current mechanism for managing the Forth Road Bridge has much to commend it. Furthermore, since it has only recently changed into a Joint Board with local transport responsibilities, we believe it would be premature and disruptive to undergo another reorganisation.

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

We consider we have insufficient knowledge of how this works in practice on the Tay Bridge to comment definitively. However, we note that the Forth Road Bridge used to operate on a similar basis, and is now managed by a Joint Board with local transport responsibilities; and consider that this comprised an improvement.

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?

Our responses so far note that some issues are best tackled with a common approach; common management clearly would facilitate this. However, on balance we believe that the benefits of this would be outweighed by the loss of local understanding and decision-making. As noted above, there are issues where a different approach is warranted at each crossing, and there is a strong argument that this is best dealt with by local management.

It would be entirely acceptable, if not desirable, for local management to operate within a framework of guidance set by the Scottish Executive; such guidance reflecting those areas where commonality is required, and being sufficiently specific or loose to reflect the issues at hand.

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

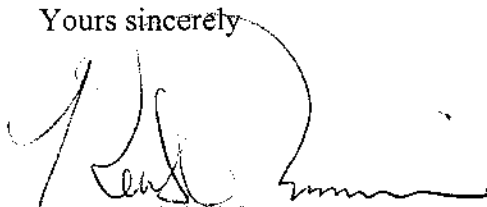
As noted above, we do not believe that the case has been made for such an arrangement.

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

As noted above, we do not believe that the case has been made for change in this respect.

If you have any queries, please contact Chris Day on 0131 469 3568.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew M Holmes', written over a large, faint circular watermark or stamp.

Andrew M Holmes
Director of City Development