

Response from the Road Haulage Association  
The Road Haulage Association, Roadway House, Ingliston, Newbridge  
EH28 8NZ

## **Tolled Bridges Review - Phase Two Consultation**

The Road Haulage Association (RHA) was formed in 1945 to look after the interests of haulage contractors in various areas of the country, in effect, amalgamating local organisations that had been established. The Association has subsequently developed to become the primary trade association representing the hire-or-reward sector of the road transport industry. There are now some 10,000 companies in membership varying from major companies with over 5,000 vehicles down to owner-drivers. In Scotland the RHA represents approximately 1,000 members across the size spectrum.

The RHA has consulted with members regarding the Tolled Bridges Review and the following represents current views of hauliers in Scotland.

### **Question 1**

RHA has no comment on this issue.

### **Question 2**

We see no viable reasons for extending exemptions for emergency vehicles beyond those currently in place for Ambulance, Fire & Police Services.

### **Question 3**

RHA does not believe that there is a case for extending the exemptions to the AA, RAC & other commercial breakdown services responding to breakdowns on the road network off-with the bridges. We believe the exemption currently in place for vehicles responding to breakdowns on the bridges should remain in place and every effort should be made to clear breakdowns from the bridges as soon as possible in order to aid the free flow of traffic.

### **Question 4**

We can see no reason why public service vehicles and multi occupancy vehicles should be exempt from bridge tolls.

### **Question 5**

We believe that multiple crossing discount vouchers should be made available to all bridge users and not just to particular classes of vehicle. We do not believe that discount vouchers should be restricted in the case of cars to multi occupancy vehicles as this discriminates against drivers who do not have the opportunity to car

share due to the time and / or destination of their journey. It is our belief that when commuters have an opportunity to car share, they will do so in any case due to the high cost of fuel, convenience etc, and offering such drivers a discount on their bridge toll is unlikely to change that decision process. It will also be very difficult to police and would create more delays at tollbooths, checking the number of passenger's in particular vehicles. Should the bridges introduce some form of automatic unmanned tolling in the future, this would become even more difficult if not impossible to police.

### **Question 6**

We believe that vehicle classification should be standardised for levying tolls on all Scotland's tolled bridges and indeed if possible throughout the UK. We believe that vehicle classification should be simplified and should be for motorcycles, cars, buses in excess of 8 seats and goods vehicles in excess of 3.5 Tons. We also believe that the system could be further simplified by removing additional tolls for vehicles towing trailers as they will fall into the same general weight categories, i.e. under or over 3.5 tonnes GVW. We would further suggest more advanced signing of the tolls applicable to the bridge giving the occupants of the vehicles more time to have the correct toll ready prior to arriving at the tollbooth.

### **Question 7**

Every effort should be made to encourage modal shift where possible. However there will be many that have no alternative than to use their cars due to lack of choice particularly early morning and late evening. On more general terms, it has been proved that the Park & Ride schemes can work well and therefore the Scottish Executive or those responsible for the management of the bridges and road network should do all they can to encourage more similar schemes.

### **Question 8**

We believe this may have a very slight impact on ordinary motorists but would have little or no impact on freight movements. Freight movements are in response to customer requirements and it is doubtful that hauliers would recover any additional costs. (Dartford Crossing trialled a cheaper night rate for commercial vehicles but this had no effect on numbers). We also believe, as commuters don't really have any control in the majority of cases when they start and finish work, it may shift congestion from the bridges in question to other and probably more unsuitable routes. The Scottish Executive and RTP's could do more to encourage flexible working practices and where possible opportunities to work from home.

### **Question 9**

We believe that consideration should be given to the wider economic issues when setting tolls for different vehicle types. Whilst it may seem logical to assume heavier vehicles cause more wear and tear and should pay higher tolls, much more needs to be brought into the equation. Freight movements provide an essential service to the whole Scottish Economy and vehicles are becoming more "road friendly" all the time. The majority of HGVs now running on full air suspension with a greater number of axles carrying the weight. A 44 tonne GVW articulated HGV running on 6 axles

now transfers substantially less weight per axle to the road surface than a normal bus or coach does and is much more likely to be running on air suspension than many of the older buses that are still in service.

#### **Question 10**

We believe that a Public Local Inquiry should be held if there is significant concern. We also believe a “weighted system” should be put in place in which Local Authorities / Key Stakeholders carry a higher level of input than an individual member of the public.

#### **Question 11**

We do believe final approval should rest with Scottish Ministers.

#### **Question 12**

We do not believe that there should be any automatic increases applied to tolls. Using an inflation-linked index increase annually would cause operational problems. For example, taking the current cost for a car on the Forth Bridge of £1.00 and adding an inflationary increase to it would result in a toll of £1.03. It goes without saying the problems this would bring with counting change for drivers etc.

#### **Question 13**

We believe all the tolled bridges in Scotland should be the overall responsibility of the Scottish Executive or the National Transport Agency. A national perspective for all tolled bridges would in the long term suit better the needs of road users. It should still be possible for the bridges to retain a Management Authority under the umbrella of the Scottish Executive or National Transport Agency. We also believe the Forth Bridge and Tay Bridge should become part of the National Trunk Road Network.

#### **Question 14**

We do not believe that powers and functions of the current bridge authorities should be transferred to Regional Transport Partnerships in the future. We believe they should be the responsibility of the Scottish Executive or National Transport Agency in conjunction with their own individual Local Management Authority to deal with operational issues.

#### **Question 15**

We would wish to see the Erskine Bridge remaining as part of the National Trunk Road Network as it currently is and remain the responsibility of the Scottish Executive / National Transport Agency.

#### **Question 16**

We do not believe that there is any evidence to suggest that the FETA model has any disadvantages. However a uniform approach should be applied to all tolled

bridges in Scotland. All Local Management Authorities should deal with operational issues under the overall responsibility of the Scottish Executive / National Transport Agency.

**Question 17**

We do not believe the powers of the TRBJB should be extended to that of FETA in order for it to gain the powers to introduce local measures to improve local transport links and reduce congestion. This should remain the responsibility of local councils / RTP's or the Scottish Executive / National Transport Agency, depending on classification of the roads in question.

**Question 18**

We believe there is merit in having a single body with overall responsibility for the tolled bridges in Scotland but retaining the Local Management Authority to address operational issues.

**Question 19**

We believe all bridges should be the overall responsibility of the Scottish Executive / National Transport Agency and should all become part of the National Trunk Road Network

**Question 20**

The RHA do not have any further comments to make.