

RAC plc

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RAC

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Rebecca Daddow
Scottish Executive
Roads Policy and Group Finance Division
2-DD, Victoria Quay
Edinburgh
EH6 6QQ

Dear Ms Daddow

RAC plc response: Tolled Bridges Review – Phase Two

RAC welcomes the opportunity to comment on this second phase of consultation on the Tolled Bridges Review and I have pleasure in enclosing a submission, on behalf of RAC plc.

We have focused our response on the subject of exemptions which, we believe, is of most relevance to the services provided by RAC. We have, where appropriate, made more general comments on those issues that do not directly impact RAC services.

Whilst the original rationale for charging tolls on the bridges stems from the need to pay for construction and/or ongoing maintenance, RAC believes discussion on changes to the existing tolling regime should be within the wider debate of congestion management.

RAC strongly believes that any form of road user charging should differentiate between those vehicles that are part of the solution to easing congestion and those that might be regarded as part of the problem. Prompt attendance to roadside incidents allows RAC to help alleviate resulting congestion and any threats to wider road safety. Our access to tolled bridges, or indeed any stretch of road or designated zone, should not be regarded in isolation as effectiveness in roadside service provision recognises no boundaries. It is our ability to respond wherever and whenever, with the most appropriate resource as quickly as possible, without avoidable impediments, that is crucial to maintaining resilience and optimum performance in a countrywide distress service.

The role of our vehicles in promoting road safety and cutting congestion has already been recognised through our exemptions from existing congestion charging schemes in the UK and RAC plc is seeking exemption from charging on all of Scotland's tolled bridges for accredited breakdown and recovery vehicles.

For your information I enclose, as Appendix 1, further detail on the operational aspects of the deployment of RAC patrols.

Please do not hesitate to contact me on 020 8917 2755 if you have any queries or require further information.

Yours sincerely



Gill Kerr
External Affairs Manager

RAC PLC RESPONSE TO SCOTTISH EXECUTIVE CONSULTATION

TOLLED BRIDGES REVIEW – PHASE TWO

A) Introduction

RAC welcomes the opportunity to comment on this second phase of consultation on the Tolled Bridges Review.

RAC is a leading motoring organisation that supports over 6 million individual and business customers with breakdown cover and a wide range of individual motoring solutions. The services offered by RAC plc include legal services advice, driver training, vehicle leasing, truck and van dealerships, automotive glass replacement manufacturing and fleet management.

We are separate from the RAC Foundation for Motoring, an independent body established to protect and promote the interests of UK motorists.

In 2004, the Scottish Executive's White Paper on Scotland's Transport Future stated the intention to stabilise road traffic volumes at 2001 levels by 2021. As traffic increases, so too does the problem of congestion which adversely impacts reliability of journey time, our economy and our environment. On that basis, RAC firmly believes that the discussion on tolled bridges should be brought into the wider congestion management debate.

Our response to this second phase of consultation on the Tolled Bridges Review focuses on exemptions from charging. We have made more general comments on the remaining subjects on which feedback has been sought.

B) Exemptions

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?

RAC Response:

RAC provides a breakdown and recovery service for 400,000 Motability customers in the UK. Motability is an independent not-for-profit organisation, which provides mobility solutions for disabled people.

Whilst RAC does not have a particular view on the system for verifying Blue Badge exemptions per se, we are of the opinion that a central process is required for registering all those entitled to exemptions. This would enable those eligible, to register by production of supporting documentation.

Advance registration for all those qualifying for exemption would ensure smoother passage of vehicles through toll booths.

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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?

RAC Response:

RAC believes that such an exemption should also be extended to certified breakdown and recovery vehicles. Breakdown rescue and recovery are emergency services provided at the roadside, the successful fulfilment of which affects not just the driver whose vehicle has broken down, but all other road users in the vicinity in terms of road safety and congestion relief. RAC patrols must respond quickly to motorists who are often in distress and can be in dangerous or vulnerable situations.

RAC plc would further support the exemption for emergency services to be extended to vehicles registered to HM Coastguard. HM Coastguard is already a recognised '999' service and their exemption from charging is particularly relevant as the tolled bridges cross estuarial waters.

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?

RAC Response:

In recognition of the vital role that our vehicles play in promoting road safety and cutting congestion by repairing and removing vehicle hazards, RAC believes certified rescue and recovery operators should be exempt from charges on tolled bridges.

Broken down vehicles can block roads. As average traffic volumes rise, so too does the frequency of breakdowns. It is worth emphasising that a breakdown occurring in the vicinity of a tolled bridge can have equal impact on traffic congestion on the bridge itself.

Equally, clogged up roads create difficult driving conditions which often lead to an increase in the rate of breakdowns, causing more congestion and pollution, and creating safety hazards.

Broken down vehicles are often in a dangerous environment and the occupants may be in vulnerable situations from personal security to medical conditions, and in considerable distress. Our Roadside service is an emergency service for drivers and benefits all road users.

Rescue and recovery services make a vital contribution to road safety and congestion management in providing swift management of roadside incidents thus improving traffic flow for public transport, commercial vehicles and private cars and positively impacting on the economy in helping to deliver more reliable journey times. It is therefore vital that we are able to respond quickly and efficiently to requests for our services. Flexibility in deployment is key to this.

Concessions are granted to blue light emergency vehicles on the basis that they have no discretion over the time, destination or means by which they travel. Breakdown and recovery vehicles equally do not make discretionary journeys and their trips cannot be switched to alternative modes, routes, destinations or times of day. Neither can we avoid the tolled bridges as they often provide the quickest and most direct route to reaching a customer in a potentially dangerous and vulnerable situation. Journeys are determined by the location of the broken down vehicle and the time of its breakdown.

As rescue and recovery services are part of the solution to incident management and the containment of congestion and road safety, then unhindered deployment is essential,

regardless of which roads are subject to charge. To improve speed of attendance time, simulation studies were commissioned a few years ago from IC Parc, a company linked to Imperial College London. These studies concluded that less, rather than more constraints should be placed on the areas in which patrols or contractors work. Indeed, they estimated that barriers of any kind to freedom of deployment would result in a 10% increase in attendance times.

The important role that our Roadside patrols play in helping achieve goals of reducing congestion and improving road safety has already been recognised through our exemptions from urban congestion charging schemes in London, Durham and Edinburgh (proposed), and indeed in European legislation on Drivers Hours. We believe these precedents should be followed in the tolling regime for Scotland's bridges in the interests of road safety and congestion management.

In line with congestion charging schemes, RAC suggests that only bona fide rescue and recovery firms be exempt from charges on the tolled bridges. We propose that to qualify for exemption, operators would have to demonstrate certification to BS EN ISO 9001:2000 in conjunction with British Standards PAS 43, or comparable other EU standards. These very clearly define the scope of a rescue and recovery operator's business and address the requirements specific to our industry. Requiring evidence of certification is a simple and effective way to identify genuine operators thereby protecting the public interest. Further detail is provided in Appendix 1 – Sections 6 to 8.

Question 4:

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

RAC Response:

RAC firmly believes policies on bridge tolls should differentiate between vehicles which are part of the overall transport solution and those which might be regarded as part of the problem.

In existing congestion charging schemes, and under The Road User Charging (Exemption from Charges) (Scotland) Regulations, public transport vehicles benefit from exemption due to the role they play in easing congestion. RAC believes this exemption should be extended to tolled bridges.

As the bridges are already tolled, it could be said there is already an incentive to car share. That said, RAC believes consideration could be given to exempting or discounting multiple occupancy vehicles to further encourage changes in driving patterns. This would be a step in the right direction to managing congestion and would be even more effective if supported by companies introducing travel plans for employees, such as car-sharing.

There would, of course, need to be clarity in defining what constituted a multiple occupancy vehicle.

C) Tolling – General comments

RAC believes policies on bridge tolls should be discussed within the wider debate of congestion management and that charges should differentiate between vehicles, which are part of the overall transport solution and those, which might be regarded as part of the problem.

Vehicle classification

RAC supports a common vehicle classification system for tolls at all of Scotland's tolled bridges. This would offer greater transparency to road users and mitigate against potential confusion on charges levied.

Introducing different charges according to vehicle type is already being taken forward by the EC Proposal to amend Directive 1999/62/EC ("Eurovignette" Directive) on the charging of heavy good vehicles. The current proposal is to extend the Directive to take into account vehicles >3.5 tonnes maximum permissible gross laden weight (existing legislation affects those vehicles >12 tonnes), and without a concession, would mean our patrol vans would fall within scope.

Breakdown vehicles will fall outside the scope of the UK's Lorry Road User Charge by virtue of their role and the same strong arguments apply equally to the amended directive in recognition of the emergency service provided at the roadside.

Toll charges

The risk of displacement from tolled bridges to uncharged roads needs to be examined when setting charges. RAC supported, in principle, the building of the UK's first tolled motorway, the M6 Toll, as it offered a means of reducing congestion on a particularly busy stretch of the motorway network and provided individuals with the choice as to whether to use a toll road or not. The initial low level of take-up of the M6 Toll by heavy freight vehicles indicates that tolled roads will not be used, if an alternative is available, unless the charges are seen to be realistic.

Whilst RAC acknowledges that toll levels cannot necessarily be set at the same price for all bridges, we would like a legislative cap on the level of charges that can be levied.

RAC believes the prime objective for road pricing should be to ease congestion by helping to regulate demand on the busiest stretches of the road network at the busiest times and that decisions should be based on the effective functioning of route corridors in a region as a whole. Variable charging already exists, to a certain extent, on the M6 Toll Road where night tariffs (23.00hrs – 06.00hrs) are lower than day tariffs, although the ability of the M6 Toll operator to set whatever tariffs it wishes, without accountability for the impact on the surrounding network is a serious shortcoming.

Whilst we support the need for effectively managed toll roads in tackling congestion, we would not favour any increases to charges which would unfairly discriminate against drivers, and in particular would not favour an increase to charges that impact on our patrol vans and which might penalise a patrol van when towing a broken down vehicle. Increasing charges to rescue and recovery vehicles would penalise a service that contributes to congestion reduction

D) Management of Scotland's tolled bridges – General comments

It is RAC's opinion that a single authority or agency would, long-term, be the most effective way to manage the tolled bridges. This would enable the development and implementation of a common set of policies, applicable to all tolled bridges in Scotland, which should ward against confusion for the road user and reduce the administrative burden on business. These should focus on consistency in exemptions, vehicle classification and toll payment. It could also facilitate the establishment of a central body for registering for exemptions.

RAC does not have any comment on which body – existing or planned – would be the most appropriate. However, it is vital that they work in partnership with the Regional Transport Partnerships, local authorities and other stakeholders.

RAC considers that irrespective of the status of the tolled bridges - be they privately operated, part of the trunk network or locally managed - it is essential they are integrated into regional transport planning. This would fully support the Executive's objectives of delivering an integrated transport system that meets economic and social needs while addressing environmental issues.

E) Conclusions

RAC welcomes the Scottish Executive's suggestion that consistency of approach could be applied, in certain elements, to Scotland's tolled bridges. We believe a piecemeal approach with different exemptions, discount schemes and different methods of payment would add confusion for the motorist and put a significant administrative burden on business. Systems should be fair and easy to use to encourage different driving patterns and, where possible, divert drivers to other means of transport.

RAC firmly believes that charges on tolled bridges should differentiate between those who are part of the solution to congestion management and those who are potentially part of the problem. Ensuring that certified breakdown and recovery vehicles are not negatively impacted by road charges would be entirely in line with the Scottish Executive's aims of reducing congestion.

In recognition of the vital role our breakdown and recovery services play in reducing congestion RAC is seeking an exemption from charges on all tolled bridges in Scotland. It is difficult to think of another service activity, which has the same potential as the breakdown and recovery industry, to help in securing free-flowing traffic, while reassuring the motorist in distress.

Exemptions have already been granted in London, Durham and Edinburgh (even though a referendum went against adopting congestion charging in the city), and we believe this should set a precedent to be followed in a tolling regime for Scotland's bridges.

APPENDIX 1:

OPERATIONAL ASPECTS OF PROVIDING RESCUE AND RECOVERY SERVICES ON TOLLED ROADS

1. General background on RAC's Rescue Service

RAC's Roadside rescue service is an emergency service for drivers in distress. We receive 4.5 million calls and respond to around 2.5 million service breakdowns per annum. On a typical day we attend approximately 7000 breakdowns. This can more than double to over 14,000 on busy winter days when the weather is bad.

RAC devotes extensive resource to technical development in support of our patrols to ensure fast attendance, a high fix rate (in excess of 82%) and to ensure we continue to deliver the best customer experience at the roadside.

2. Standards

RAC enforces rigorous national standards covering attendance, fix rates and safety in order to match drivers' and freight operators' expectations of an efficient and professional service. The high fix rate achieved by our patrols at the roadside, currently 82%, is achieved by training and equipping them with an extensive range of diagnostic electronic tools and equipment. In addition to conventional electrical testing equipment, patrols also have the capability to read and reset, through their mobile computers, the diagnostic information presented by all modern vehicle engine management systems. By linking this diagnostic information with the technical information held on the mobile computer, the patrols are guided to the cause of the problem and the remedial action required.

4. Deployment Strategy

RAC alone invested £10m in new deployment technology in order to reduce the time it takes to resolve breakdowns. It does not make sense for these improvements to be undermined inadvertently by measures which could hinder attendance in emergency situations.

RAC currently divides Great Britain into 3 regions, which are further divided into working areas and patrol cells. There are two Response Centres, which deploy RAC patrols, and one Response Centre, dedicated to deploying contractors who provide back up at busy times, in rural areas and for more complicated recoveries.

At times of high demand, each cell is managed separately, with very little movement of patrols between cells.

In excess of 75% of all breakdowns are automatically despatched to the appropriate resource via the RAC computer aided despatch system. In 2004, RAC won the National Customer Service award for the Best Use of Technology in Customer Service, based on the use of our command and control system. The system automates our dispatch process using digital map-based screens to help decision making - and enables guided call handling that allows operators to diagnose customer breakdown problems more accurately.

To improve speed of attendance time, simulation studies were commissioned a few years ago from IC Parc, a company linked to Imperial College London. These studies concluded that less, rather than more constraints should be placed on the areas in which patrols or contractors work.

5. The impact of tolling on deployment

Tolling creates artificial boundaries and a corresponding reduction in the area over which a patrol operates constraining patrol movement to tightly defined areas would increase patrol travel time by as much as 10%.

The impact of this increased travel time would either be that broken down vehicles would remain longer at the roadside to be rescued, or more patrol vehicles would be needed on the road to maintain the current attendance time

Charging accredited rescue and recovery operators thus mitigates against the overall aim to reach motorists as fast as possible and to quickly remove obstructions to free-flowing traffic, eliminate safety risks and in turn reduce congestion and emissions

6. Controlling concessions to Breakdown Vehicles

The solution accepted by those authorities with existing charging schemes has been that any concessions should be granted for any commercially operated vehicle which is :

- owned or managed by a company certificated to both BS EN ISO 9001:2000 and the BS Publicly Available Specification 43– Safe working of vehicle breakdown and recovery operators (PAS 43).
And
- constructed, adapted or equipped to provide road vehicle repair or recovery services and is mainly engaged in providing such services to vehicles which have broken down provided that such vehicles have been registered for exemption.

This addresses the need for an authority to:

- ensure that the breakdown and recovery organisation is a “bona fide” breakdown services firm,
- be in possession of a list of vehicles operated by each individual firm, and
- be satisfied that checks are in place to verify both vehicles and their movements

7. Deployment Practice and Audit Trails

Audit trails are required as part of BS EN ISO 9000 certification, and can provide for periodic verification if required by authorities that there is no abuse of any concession granted to rescue and recovery operators.

Compliance with BS EN ISO 9000 requires processes that underpin consistency and quality. This cannot be achieved without full job trackability, and therefore records are available for all vehicle movements associated with breakdown and recovery jobs. For those companies, such as RAC, AA and the larger contractors that have automatic vehicle location systems, all vehicle movements are logged and retained for a period for audit purposes.

It is regarded as gross misconduct, and therefore an offence for a patrol, employed by one of the major motoring organisations to use a patrol vehicle for private use.

8. Bona Fide Rescue and Recovery Firms

To meet the requirement for breakdown services to be “bona fide”, we have proposed that BS EN ISO 9001:2000 in conjunction with PAS 43, or comparable other EU standards, be used. These very clearly define the scope of a rescue and recovery operator’s business and address the requirements specific to our industry. This quality management standard is internationally

recognised and is open to any business, irrespective of size. Indeed, BS EN ISO 9000 accreditation is held by breakdown and recovery businesses employing as few as 3 vehicles and as many as 3000. It is already in place and provides independent auditing by accredited agencies. The integrity of a firm's processes and procedures and their application are regularly audited. Any areas for improvement are recorded and re-audited within a specified timescale. Serious non-compliance or sustained lack of regard for compliance can result in loss of certification.

Evidence of accreditation is available via the certificate issued certifying compliance, and this bears a unique number. Any fraudulent activities clearly result in loss of accreditation.

RAC and AA already comply with this standard for their own patrol vehicles and along with Green Flag use this certification as a measurement of contractor suitability to provide additional services. We are unaware of any breakdown and recovery businesses certified to BS EN ISO 9001:2000 who operate to standards likely to bring the industry into disrepute.

9. Controlling Breakdown Vehicles operating on tolled roads

Around 95% of breakdowns are attended by the main operators in the UK, namely RAC, AA, Green Flag, Mondial and Britannia Rescue.

We maintain up to date lists of the vehicles on our fleets and these are open to inspection at any time. Processes associated with this are subject to BS EN ISO 9001:2000 audit in common with other processes associated with day to day management of the business. It is in our interests to notify all changes to authorities and we are open to discussion on the best way of addressing this to eliminate unnecessary administrative burdens for both the authority and ourselves. Clearly, checks can be made by an authority using the DVLA database to satisfy itself that any vehicle registration submitted is for a vehicle of a type fit for the purpose of breakdown or recovery.

It is not in any operator's interests to have more vehicles on its fleet, or in any single geographical territory than is absolutely necessary for the number of breakdowns.