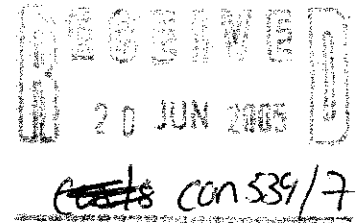




17 June 2005

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



Dear Ms Daddow,

**Scotland's Transport
Tolled Bridges Review – Phase Two Consultation**

As the trade association for bus, coach and light rail, the Confederation of Passenger Transport is pleased to have been given the opportunity to respond to the Scottish Executive Consultation specified above.

Many of our members operate bus and coach services which use the Forth, Tay and Erskine Bridges, and the smooth operation of the bridges is critical to the success of these services and to delivering modal shift.

The questions relevant to CPT are responded to below, but, by way of introduction, we would like to make some general points:

1. To encourage modal shift, tolls for taxibuses, buses and coaches should be abolished. They are efficient users of road space and part of the congestion solution. We are heartened by indications that public transport is likely to benefit from free crossings of the Forth Road Bridge from April 2006, but this needs to apply to each bridge, in a simple manner that does not entail significant bureaucracy for operators.
2. The bus priority measures on approach to the Forth Road Bridge from the north have been invaluable to operators. These need to be extended so priority is given to public transport vehicles on approach to the tolls at both the Forth and Tay Bridges, along with priority toll booths provided for such vehicles.
3. With any review of the Tay Road Bridge, the opportunity should be taken to move the Toll Booths to the south approach, easing congestion in Dundee City Centre. As part of this, provision for Park and Ride should be made at the south access. Should this occur, CPT would still want bus priorities on to the Tay Bridge at the Dundee end to be retained.

Confederation of Passenger Transport UK

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4. The major operational problem for operators stems from the imposition of high wind restrictions. These should be reviewed to take account of improved vehicle design, so that the number of days on which restrictions are required is reduced.
5. When restrictions are being imposed, the communication of these can be improved to use modern technology (for example, e-mail rather than fax), allowing all depots of operators to be updated simultaneously.

Response to questions relevant to CPT:

1. Whilst this is a sensitive issue, significant delays arise at the tolls caused by Blue Badge holders who have not pre-registered, particularly at busy times. An option would be to only allow exemption when the Blue Badge holder has pre-registered, and require payment at other times. This would be consistent with entitlement to Concessionary Fares.
4. Public transport vehicles should be exempt from tolls. Multi occupancy vehicles not providing public transport services should not be exempt from tolls unless a strict enforcement regime applies.
5. Assuming public transport vehicles are exempt from tolls, no discounts should apply to other vehicles. The majority of motorists using discount vouchers are using the bridges at peak periods, giving the perverse situation that peak time users pay less than off peak users.
6. Consistency makes sense, and could avoid confusion and delays at the tolls.
7. This is essential, and measures to facilitate this will include differential tolling, bus priority measures and dedicated toll booths.
8. This should encourage modal shift and may result in some users travelling at different times to benefit from reduced tolls. In following a policy like this, care must be taken to avoid simply moving or extending the peak.
9. This policy would be at odds with our recommendations for reducing congestion and non essential trips given in the answers above.
11. We agree final approval should rest with the Scottish Ministers, as it gives an opportunity for decisions taken by the management authorities to be reviewed and checked for appropriateness.
12. Yes, subject to public transport vehicles being exempt from tolls and to tolls being sensible amounts to minimise delays due to change. This will avoid public relation problems as and when tolls rise, and maintain the funding stream for the bridge authorities.

13. It makes sense to pass control to the new STA, but only when the necessary legislation is in place, and not at the expense of revised tolling arrangements on the Forth Road Bridge in 2006.

14. This would be difficult in the case of the Tay Road Bridge, given that two Regional Transport Partnerships would be involved. On a wider scale, there is logic in minimising the number of bodies involved, and it may be best to empower the Regional Transport Partnerships with taking on powers if they see fit.

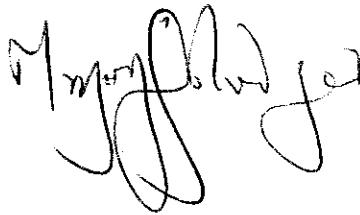
15. CPT considers that the current arrangements work well, and that therefore little benefit would be gained by de-trunking the Erskine Bridge.

16. The weakness of the FETA model is that there often appears to be friction between some of the constituent local authorities, and actions depend on which authority holds the chair at any particular time.

18, 19, 20. Whilst there appears to be logic in having a single body, CPT is not really in a position to judge this. What our members are looking for is consistent treatment of public transport services, with emphasis on those issues summarised in the introduction to this letter.

If you require further information, or elaboration on any issue, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'M. J. ...', written in a cursive style.