

**Institution of Civil Engineer's Response to The Scottish Executive's Consultation
on the
Tolled Bridges Review - Phase Two**

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?

Response:

Yes. Recent research has shown that up to a third of Britain's disabled car badges are being used fraudulently. The current Blue Badge system is open to abuse and it is common knowledge that the badge can be downloaded from the World Wide Web and forged. Theft of Blue Badges and forgery is an accepted problem with the City of London road user-charging scheme and will become more prevalent as charges rise.

Assuming that there exists a robust system for controlling the use of Blue Badges, it seems overly complicated and time consuming to require blue badge holders to fill in forms or apply for vouchers at the tolled bridges. It should be enough for the blue badge holder to display the blue badge as this has pictorial identification of the holder. This is similar to the system of identification operating in concession schemes on public transport that works well.

Ultimately it is expected that emerging technologies such as smartcard and or electronic tolling may provide an answer.

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?

Response:

Ambulance, Fire and Police Services should continue to be exempt. Exemption should be extended to Coastguard vehicles. This gives consistency with Road User Charging (Exemption of Charges) (Scotland) Regulations.

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?

Response:

There is no reason to exempt commercial breakdown services such as the AA and RAC from paying tolls as these are commercial organisations that recover their costs directly from the motorist.

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

Response:

In responding to this question the fundamental question as to what is the purpose of the toll has to be addressed.

If the toll is in place to simply manage and maintain the bridge then there is a slim argument for exempting such vehicles from the toll. It could be argued that in encouraging modal shift to public transport or car sharing then this may have a positive impact on the bridge condition through a reduction in the number of axle loadings it sustains. However, the counter argument may be that the increased axle loading from public transport vehicles outweighs any such benefit. Nonetheless, the complete removal of tolls would be unsustainable in the event that a significant level of modal shift were achieved on the basis that toll income was still required to maintain the bridge.

If however the toll is also to be used as a means of congestion reduction, then there is a stronger argument for using the toll as a means of encouraging modal shift. Removing tolls from public transport vehicles on registered services would send out a clear message to the traveling public. If exemption of MOV is to be considered as a means of reducing congestion it must be as part of an overall congestion-charging scheme for the area or indeed a national congestion-charging scheme.

Discount Schemes

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?

Response:

There can be little argument on engineering grounds to sustain discount schemes that effectively reward frequent users of the bridge. If tolls are required to maintain the bridge structure then multiple uses of the bridge by an individual contributes as much to the deterioration of the structure as an equivalent number of individual uses. HGV's cause significantly greater wear and tear and increased maintenance and it would certainly not be appropriate to offer them discounts for multiple uses.

Equally from a traffic reduction perspective, such a proposal is contrary to the aims of encouraging a movement away from car use.

Classification of Vehicles

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

Response:

A common vehicle classification system is considered important, not only for Scotland's tolled bridges but also for all tolled bridges in the UK and in Europe.

This is particularly important with the introduction of electronic tolling systems where in employing automatic vehicle classification, it is essential that the vehicle is classified using parameters, which can be accurately measured electronically. Directive 2004/52/EC of the European Parliament on the Interoperability of Electronic Road Toll Systems in the Community will require all facilities with electronic tolling to be compatible throughout the European Union offering a 'seamless service' for travelers throughout Europe. Electronic vehicle classification technology cannot deal with the present variety of classification systems on every individual facility and one of the operational challenges will be a common vehicle classification system throughout Europe.

A common vehicle classification system will cause less confusion for users, it will be easier to compare and analyse traffic composition at different facilities, it will standardise signing for the benefit of users and make it easier to operate a common central toll administration back office system.

Promoting PSVs and MOVs

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?

Response:

As in Question 4, the question of the purpose of the tolling regime is pertinent in addressing this question. If the tolls are intended to be used in the context of congestion reduction, then the encouragement of Public Transport and MOV and a reduction in SOV is a legitimate tactic for varying toll charges. This question really ought to be considered in the context of National Road User Charging and what the Scottish Executive's aspirations are for this.

The need to reduce traffic on the Forth Road Bridge is patently obvious to even the casual observer where the level of traffic using the bridge is greater than the link capacity and therefore is an immediate issue for the bridge itself. In the case of the Tay and the Erskine, the case is not as immediate and these require to be addressed on their individual merits.

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

Response:

Yes, although the effectiveness of such a tactic would depend on how much the tolls were raised by during these peak periods and how long the peak periods lasted. This could be used in conjunction with a reduction or elimination of tolls outwith peak periods which would lead to a more effective uptake.

In raising toll levels at peak periods, consideration must be given to members of the public who have little choice in adjusting their time of travel. Therefore high quality public

transport alternatives together with other options should be provided before congestion charging at peak periods is introduced

Tolls Reflecting Cost of Wear and Tear

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?

Response:

If tolls are to be charged to meet the cost of their management and maintenance then it is right that this should take account of the onerous impact that heavier vehicle types with larger axle loads have on the bridge condition.

A graduated toll for the heavier vehicles based on their gross carrying capacity should be adopted and the common classification system referred to in Question 6 could be used for this purpose.

Procedure for Changing Tolls

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?

Response:

No, there are countless other examples where charges for public services are varied without the need to conduct a PLI. The current arrangements result in the iniquitous position where a single objector can delay the introduction of necessary toll increases at great expense to the public purse. A much quicker and more flexible approach is required so that tolls can be easily changed to meet changing circumstances but all still within a regulatory framework. Tolls are generally raised only to meet the cost of increased repair and maintenance and it should be sufficient for this to be agreed by Scottish Ministers without the need and expense of a Public Local Enquiry.

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?

Response:

Yes, it is recognised that final approval of proposed toll changes by Scottish Ministers is an important safeguard, which should be retained in the process.

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

Response:

If tolls are to be utilised for the purposes of managing and maintaining the bridge, then toll increases should relate to the cost of such operations. This does not therefore mean that toll levels need rise with inflation. Any increases in toll levels must be practical in terms of coinage.

Executive/Transport Agency

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?

Response:

It is clear that each of the three tolled bridges are unique in terms of their form and structure as well as the manner in which they are utilised and their impact on the local and national road networks. It is unlikely therefore that there will be any single model, which would adequately provide for their effective management.

In the case of the Erskine Bridge there could be a role for the Scottish Executive to administer, manage and maintain the bridge as at present. However, traffic on the Erskine Bridge is closely tied-in in Regional Transport terms with the Kingston Bridge and the Clyde Tunnel. Therefore it is debatable as to whether the National Transport Agency or the Scottish Executive is the most appropriate authority to fulfill this role.

In the case of the Forth Road Bridge there could be a case for the bridge to be managed at a national level as part of the trunk road network as it is on a strategic national route and the majority of users are through traffic. However the FETA model has worked well and there seems little point in fixing something that isn't broken.

The Tay Road Bridge connects into the trunk road network at either end and taken at face value it would make sense for the Scottish Executive or National Transport Authority to manage the Tay Road Bridge. However, the majority of traffic that travels on the Tay Road Bridge is local in nature and has a disproportionate effect on Dundee city centre. Therefore, it is considered that the management of the Tay Road Bridge at a national level would serve no great purpose.

Regional Transport Partnerships

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

Response:

It is clear that the major toll bridges in Scotland are all strategically placed on the local and regional road network and therefore the manner in which they are managed and maintained will impact on this network. It is therefore important that the bridge authorities work closely in partnership with the Regional Transport Partnerships. This does not necessarily require powers and functions to be transferred.

For example, in the case of the Tay, the current Bridge Board has no general transportation powers or functions other than to ensure the ongoing operation and maintenance of the bridge. There is little merit in transferring such functions to either of the RTP's that adjoin the bridge.

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?

Response:

Yes, the role of the Erskine Bridge on the regional network is important and therefore there is some logic in responsibility for this structure transferring to the new RTP.

Joint Board (FETA Model)

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

Response:

The FETA Model has been operating at the Forth Bridge for approximately three years and appears to have been successful in delivering a number of important transportation initiatives aimed at easing congestion around the bridge. This work has been undertaken in partnership with the voluntary Regional Transport Partnership, SESTRANS. Given the success of this model there seems little merit in breaking this up and it is concluded that in the case of the Forth, the FETA model should be continued in partnership with the new statutory RTP.

However this model may not be readily transferable to the other tolled bridges in Scotland. For example, in the case of the Tay, the Bridge Board is not in the same financial position as the Forth was to contribute funding towards wider transportation initiatives. In addition, the congestion issues associated with the Tay are of a different level and nature to those experienced at the Forth.

In the case of the Erskine Bridge, the congestion is mainly created by the application of tolls itself and not the traffic demand. It is therefore unlikely that the FETA model would provide any benefit to the operation and management of this particular structure.

Joint Board (TRBJB)

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

Response:

The Joint Board has successfully managed the operation and maintenance of the bridge since the bridge was built in 1966. This board has had a very specific and focused remit and it is this clear focus that has been one of its strengths. The Forth Road Bridge operated in a similar manner up until relatively recently however as noted in Q16 above, this role was expanded for good reason and has operated well. There seems little merit in the case of the Forth in going backwards to return to the Joint Board model. In the

case of the Tay, due to the increasing congestion issues that are beginning to affect the bridge, particularly within the center of Dundee, it is vital that the Joint Board take account of wider transportation issues in how the bridge is operated and maintained. It is argued therefore that the successful Bridge board be retained with its present specific focus of responsibility but that it works more closely in partnership with its adjoining RTP's in contributing towards future congestion reduction.

In the case of the Erskine, if this structure were transferred to the new RTP then operational and maintenance responsibility could also be transferred to this organisation that would negate the need for a separate Joint Board.

General Management Options

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?

Response:

As previously noted each of the three tolled bridges in Scotland are unique in their own local context and there would seem little merit in having a single body responsible for all three bridges.

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

Response:

No comment.

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

Response:

Whichever option is elected for managing and maintaining these structures, the most critical factor is that they continue to be sufficiently funded and resourced to ensure their ongoing integrity and serviceability. It must be recognised that such large estuarial crossings have very specialist maintenance requirements and these requirements must not be underestimated or marginalised.