



Forth Estuary Transport Initiative – Application for Approval in Principle

Response from the Federation of Small Businesses in Scotland

Introduction

The Federation of Small Businesses in Scotland welcomes this opportunity to comment on the ITI application submitted by FETA. With 19,000 members in Scotland, all depending on easy movement of goods and services to ensure their business's success, we take a strong interest in transport issues and, in particular, the road network. As set out in the detail of the application, the Forth Road Bridge plays a significant strategic role in Scotland's infrastructure and so any significant changes to charging regimes on the bridge will affect businesses across Scotland.

We note that if this application is approved in principle, a more detailed statutory consultation will be carried out in 2006 however given the substantial changes proposed the Federation, as Scotland's largest business organisation, felt it would be appropriate to make some broad comments at this stage.

Timing

Whilst we acknowledge that FETA was due to come forward with a replacement charging scheme (to replace the current toll order) we are disappointed that the timing of this application and the Scottish Executive's Tolled Bridges Review has been so insensitive. The Federation spent time consulting with members across Scotland in order to respond to the Phase Two review. This review covered many of the issues being taken forward in the FETA application such as: SOV/MOV discounts; an end to discounting; peak time charging; charging HGVs proportionately; exemptions to tolls; linkages to other bodies; and classification of vehicles. Since FETA has proceeded with its application irrespective of the outcome of the Tolled Bridges Review, FSB members will naturally question the point of offering comments to the Scottish Executive on the review. It is particularly disappointing that the very issues where there was a lack of consistency across the country e.g. classification of vehicles for tolls, which would clearly benefit from a national position, are being taken forward by FETA before any national position has been determined.

We agree that action needs to be taken but it does seem strange that, at a time when transport strategy is about to take a far more strategic step forward, this application should be considered in isolation before the development of the new national transport strategy and the work of the new RTPs.

A National Issue

The application clearly sets out the significant problems facing the Forth Road Bridge. We are in no doubt that the current rise in vehicle crossings cannot continue and that it is FETA's responsibility to manage the viability of the existing crossing. However we are concerned that this is a problem of national infrastructure which necessitates wider analysis.

FETA has representatives from the local authority areas bordering the bridge and the application focuses on journey origins and destinations within these council areas, largely on end destinations in West Lothian, West and North Edinburgh and Edinburgh city centre. The application sets out that:

“Overall, the Forth Road Bridge carries a significant proportion of long distance trips at all times. In the weekday peak periods over a third of all trips are long distance, in the off peak nearly half of all trips are long distance. This confirms the importance of the bridge outside the local context of the land use relationship between South Fife housing and the Lothians employment factors.” (p.9)

Despite this statement, the idea of dealing with longer-distance traffic does not appear to be teased out anywhere else in the application. The application is – quite understandably – attempting to focus on the large number of SOV ‘commuter’ vehicles crossing the Forth and most of the plans are targeted at both managing demand, by discouraging those ‘unnecessary’ crossings, and funding alternative public transport options, most of which are focused on increased park and ride and bus routes between some of the destinations mentioned above. However, there is no discussion of the fact that a significant proportion of the traffic (as set out above) is long distance and probably using the bridge because it is part of our national infrastructure and road network. It does not seem unreasonable to suggest that the impact of any proposed changes to this group of vehicles should be better understood before any decisions are taken.

It also seems likely that the Scottish Executive will need to take a more strategic view of this problem since neither FETA, not SESTRAN, hold all the powers to solve the problems. It would seem to make better sense to delay implementation of this strategy until it can be considered within the context of the new national transport strategy and regional transport strategies. Accordingly we would support the suggestion that the current tolling regime should be extended by another three years.

Essential Business Users

We are astonished that throughout the application there is no discussion about the different types of traffic using the bridge. Whilst it would be fair to say that in capacity and maintenance terms this is irrelevant, it is certainly important when considering solutions – particularly where these solutions rely on understanding the behaviour of motorists and attempt to alter that behaviour. The tone of this application suggests that all single occupancy vehicles crossing the bridge at peak times are commuters who could choose an alternative. There is absolutely no reference to business vehicles (other than HGVs) which use the bridge because it is part of the road network which they use to deliver goods and services, often at peak times, usually with only one person in the vehicle. In planning future management of the bridge, FETA must explicitly acknowledge that the bridge is there to help transport goods and services across Scotland and that business should not be punished for doing so.

Congestion affects businesses and has an impact on the economy but there seems little point in penalising business users with increased charges whilst simultaneously using as a justification for cost increases the fact that congestion is bad for the economy. Small businesses will always be the losers in indiscriminate road user charging schemes but some form of exemption from peak time charges for business users could avoid this and would ensure that the scheme targeted those whose behaviour the scheme is designed to change. If

reductions can be allowed for multiple occupancy then there is absolutely no reason that business vehicles should not also be eligible for a reduction – the increased charge is a stick to encourage drivers to consider alternatives. For those who decide to car-share, there will be a reduction which means that business users are the only ones who are simply paying a higher charge with no alternative. This cannot be a good option for Scotland's economy.

Business Impact

There does not appear to be a thorough impact assessment accompanying this application. We note that it references economic assessment from the SITCoS study but having also referred to that document we can see little other than estimations of job figures. Most impact assessments carried out by the Scottish Executive require far more detailed assessment of the impact on business, particularly small businesses. Before any decisions are taken we would strongly urge the Scottish Executive to ensure that a business impact assessment of the measures proposed is carried out by FETA.

Central Financing

We must question the ruling out of any form of central financing from the Scottish Executive which is written off in the application as a 'blunt tool' which would ultimately mean that those not using the bridge would have to pay for it. To suggest that this is unthinkable is just silly since this is how every other part of road network (with the exception of the three tolled bridges) is paid for and since this is a major part of our infrastructure which is facing what could be described as a crisis, it does not seem unreasonable to suggest that more significant national funding might be required. This issue was also mentioned in the Phase Two review.

Comparisons

To support the application FETA refers to charges of other tolled bridges and the M6 toll road. Neither of these seems particularly fair or helpful comparisons since there is a toll-free alternative on the M6 and bridges elsewhere in Europe are likely to be subject to entirely different road pricing systems e.g. no road tax.

For further information on any of the points raised in this submission, please contact Susan Love, Policy Development Officer, on scotpu.policy@fsb.org.uk or 01259 723713