



Tolled Bridges Review – Phase Two Consultation

Response from the Federation of Small Businesses in Scotland

Introduction

The Federation of Small Businesses in Scotland welcomes this opportunity to comment on phase two of the review of tolled bridges in Scotland. 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. Businesses from across Scotland use the three tolled bridges and a number of key points came out of discussions with FSB members:

- It should be recognised that most businesses have no choice other than to use private vehicles – often single occupancy vehicles – at peak times, in the day-to-day running of their business. This may be through large or small scale deliveries to customers (including other businesses), meeting with clients, or simply transporting necessary equipment. At a time when Scotland is aiming for economic growth it would be counter-productive to penalise these businesses
- It is worth noting that there seems to be a preconception that traffic crossing the bridges is trying to enter or exit a city. This is often not the case with the bridges providing part of the road network for businesses moving goods and services around Scotland
- Congestion has a damaging effect on businesses and our primary concern is to get traffic moving more quickly without punishing SMEs who must use the tolled bridges
- There is growing resentment that tolls still exist on the Erskine Bridge when the bridge is part of the trunk road network

Questions

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?

Yes, we are in favour of any system which speeds up the process of passing through the tolls and do not understand why the existing system is so complicated. We are particularly in favour of moving towards a verification system which could work alongside electronic tolls.

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?

There is clearly merit in considering the application of exemptions as defined in the Road User Charging (Exemption from Charges) Regulations; this would extend the existing exemption to coastguard vehicles. We also believe that it may be worth considering an exemption for utility

company vehicles attending an emergency e.g. gas leak or water main problem, although we accept that it may be difficult to differentiate between those attending an emergency and those simply on the road for general maintenance.

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?

Yes, movement of traffic is critical for businesses and so if the AA, RAC or other commercial breakdown service (including small, independent operators) are attending a problem on the road network which requires use of the tolled bridges to reach the problem, then an exemption for these services should be considered. We understand that there is a certification system for rescue and recovery vehicles which could be used to ensure such an exemption is not abused.

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

As an efficient, affordable and reliable public transport is central to tackling congestion, we agree that there is a case for exempting public service vehicles. This would be in line with exemptions in the Road User Charging (Exemption from Charges) Regulations.

Exempting multiple occupancy vehicles (MOVs) could place an undue burden on single occupancy vehicles (SOVs) - many of which will be businesses as outlined above. It may be worth noting that many vehicles which are classified as SOVs on passing through the tolls may have been MOVs when travelling in the opposite direction. This is particularly the case for taxis/minibuses transporting passengers into Edinburgh for onward transport connections (e.g. airport). In considering any exemption for MOVs we believe that there is a clear case to consider the unique case of taxis and other private hire vehicles.

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?

Whilst in theory discount vouchers may be seen to offer some form of incentive for regular use, in practice this is unlikely to be the case. Drivers choose the most practical route for each journey and we do not see how savings on tolls would affect that. The value of discounts may be relatively low, but the removal of these schemes would represent a significant cost increase for regular business users, such as the haulage industry and, on balance, we do not believe it would help reduce congestion. We do, however, support the introduction of one discount scheme to be used at all three Scottish bridges. We are keen to see how such a discount scheme could be run compatibly with electronic tolls and so we would encourage a move away from a paper voucher scheme as a first step.

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

This seems an entirely sensible approach. We would suggest a simpler classification system based on vehicle excise duty codes as follows:

1. Private Light Goods – up to 3 ½ tonnes
2. Fixed Wheel Commercials – from 3 ½ tonnes to articulated vehicles
3. Articulated Vehicles

It may be worth considering whether a fourth classification is necessary for motorcycles/scooters.

We would anticipate some form of classification system which could be easily recognised at electronic tolls – perhaps through bar-coding of tax discs, for example.

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?

It is clear that there may be scope to reduce the level of single occupancy car journeys. The distinction between cars and other SOVs engaged in some form of commercial activity is important but we must ensure that in attempts to reduce congestion we do not penalise businesses using the road network as the main route for transporting goods and services.

We believe that improved public transport – such as better park and ride facilities and more reliable train services – is key to encouraging modal shift. It might also be possible to encourage some form of incentive to encourage employees from very large businesses to car share or consider other methods of transporting large numbers of employees to an individual workplace. Many companies are already implementing such schemes and this should be encouraged. We believe it is important to offer incentives, rather than punishments (e.g. workplace parking levy) to encourage a reduction in single occupancy car journeys.

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

No, this is unlikely to make a difference and would unfairly punish businesses who must use the bridge at peak times in order to meet delivery times or appointments. Given the current levels of congestion at peak times it is fair to assume that most drivers who can avoid rush hour are already doing so, and those that can't are already being punished by longer journey times.

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?

While it could be argued that goods vehicles are heavier today than envisaged at the time of construction of the tolled bridges, this is also the case for many roads across Scotland where there is no suggestion of increasing costs accordingly for heavy goods vehicles. We believe that if the same goods were transported in smaller vehicles, congestion would be exacerbated by a larger number of goods vehicles on our roads. It seems odd to suggest this at the same time as talking of encouraging more passengers to travel in fewer vehicles. The haulage industry, in particular, is

experiencing a difficult business environment and it is likely that any increased toll charges for this industry would be passed on to other business customers, which seems a futile exercise.

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?

On balance we agree that this process should be retained, although we would like to see some form of business representation as a key part of any change to tolls.

Question 11: Do you consider that final approval by Scottish Ministers is an essential safeguard for toll/charge payers or do you think that the final decision is a matter for the management authority for the bridge?

Again, on balance it was felt that Ministers should still play a role in deciding toll levels, however it is important that there is full consultation with bridge users – including businesses.

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

No, there should be no assumption in favour of regular increases.

Question 13: What advantages and disadvantages do you see if any or all the tolled bridges were to be managed by the Scottish Executive or the national transport agency?

As the first phase of this review concluded each of the three tolled bridges is unique and we therefore believe there is a case for retaining management of each bridge at a local level, enabling more responsive, accountable decision-making.

Ideally we would envisage the bridges being part of the wider trunk road network (and, consequently, toll-free). Were responsibility for managing the trunk road network to be passed to Transport Scotland, then – assuming the bridges were part of this network – it would also be sensible to pass management of the bridges to the agency.

Question 14: Should we consider transferring some or all of the powers and functions of current bridge authorities to Regional Transport Partnerships?

No. Statutory RTPs are, as yet, untested and their powers undetermined. With the establishment of a national transport agency, and the existing roles of local authorities and bridge authorities, we believe it would be unwise to pass more responsibilities to yet another organisation.

Question 15: As the Erskine Bridge functions 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?

No, and we would vigorously oppose any such proposal. Indeed, there is a strong argument for removing tolls from the Erskine Bridge since it is already part of the trunk road network.

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

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

We have no evidence to suggest that one model is more effective than the other. Regardless of which management system is implemented, it is imperative that: a) there is structured ongoing consultation (perhaps through a sub-group or some other forum) with bridge users, including specific business representation; b) meetings, decisions and accounts remain transparent; and c) that councillors, as elected local representatives, are accountable for decisions taken.

It may also be worth considering whether or not either of these management options allow for the co-opting of business representatives – as well as other user groups – onto the management board/committee.

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?

Question 19: If you think all bridges should be run by one body what form, powers and functions should this body have?

Please see responses to questions 13 and 17.

Question 20: Are there any other management options that you would like to suggest?

No, but we would draw attention to the factors outlined in our response to question 17.

For further details or to discuss any of the points above in more detail, please contact Susan Love, Policy Development Officer on scotpu.policy@fsb.org.uk or 01259 723713