Tolled Bridges Review

Joint response to Scottish Executive consultation from Friends of the Earth & TRANS*form* Scotland, 17th August 2006

1. Background to respondents

1.1 Friends of the Earth Scotland is an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability.

1.2 TRANS*form* Scotland is the national sustainable transport alliance, campaigning for a more sustainable and more socially-just transport system. Our membership includes bus, rail and shipping operators, local authorities, national environment and conservation groups, consultancies and local transport campaigns.

2. Summary of comments

2.1 We welcome the opportunity to comment on the reopened Tolled Bridges Review.

2.2 Our views, set out further in the section below, are in summary:

- Bridge tolls must remain on both Forth and Tay if efforts are to be made to manage traffic demand
- The removal of bridge tolls would lead to increased traffic, pollution and congestion
- The removal of bridge tolls would represent a financial transfer from the general taxpayer to car commuters
- The removal of bridge tolls would further damage the credibility of the Scottish Executive's Climate Change Programme
- The removal of bridge tolls would represent a further reduction of private transport prices, despite this mode of transport already not paying for its external costs
- The Scottish Executive should take action to address public perception of tolling
- Specifically, the Scottish Executive should take action to challenge the myth that the presence of tollbooths generates extra traffic congestion

2.3 We consider, for the reasons stated above, that it would be irresponsible and unacceptable for the Scottish Executive to remove bridge tolls.

3. Arguments against removal of bridge tolls

3.1 Bridge tolls must remain if efforts are to be made to manage traffic demand

3.1.1 It is clear from the Tolled Bridges Review Phase Two Report that the tolls on both the Tay and Forth road bridges play a vital role in constraining traffic demand. Specifically, the report states that, "*Traffic modelling indicates that the existing*

congestion problems on the Forth would be exacerbated without tolls, whereas increased tolls could help to ease congestion problems." (Phase Two Report, p.23)

3.1.2 In the case of the Tay, the report states, *"Modelling indicates that the existing congestion problems on [the] Tay would be exacerbated without tolls, and that increased tolls could help to ease congestion problems."* (Phase Two Report, p.25).

3.1.3 Removing tolls from either or both bridges would further damage prospects of meeting the Executive's road traffic stabilisation target, would exacerbate existing local air quality issues, and would lead to increased CO_2 emissions. It would in our view be perverse for the Executive to now ignore the findings of its own report.

3.1.4 It is therefore vital that some form of tolling (or, preferably, road user charging) remain in place on both bridges in order to constrain traffic growth and limit congestion.

3.2 The removal of bridge tolls would lead to increased traffic, pollution and congestion

3.2.1 We note the findings from the Tolled Bridges Review Phase One Report that removing bridge tolls would increase traffic levels on the Forth Road Bridge by 15-20%, and FETA's own response to this consultation, which indicated that removal of Forth Bridge tolls would increase traffic levels by 21%. This would have a severe impact on the environment, and would generate increased levels of congestion than there is currently.

3.2.2 It is understood that part of this increase in traffic would be as a result of trips being made via the Forth Road Bridge rather than via the Kincardine Bridge. This would be a perverse response, especially in the context of the Scottish Executive's action to increase road capacity at the Kincardine Bridge by the construction of a second bridge. Action should be taken to remove traffic flows from the Forth Road Bridge, not to increase them.

3.3 The removal of bridge tolls would represent a financial transfer from the general taxpayer to car commuters

3.3.1 Removing tolls on either Forth or Tay bridges would have the effect of reducing the price paid by car drivers (a group who already fail to pay the true costs of their transport) and shifting the financial burden onto taxpayers. It is well established that car ownership and use is significantly higher amongst higher income groups, so the effect of this transfer is likely to be socially regressive. The cost of this is set out in the Phase Two Report: on the Forth Bridge, this is estimated as a loss of tolling income of £10m per annum and a cost of maintenance and investment of £141m up to 2020-21.

3.3.2 On the Tay Bridge, the cost is estimated as a loss of tolling income of £3.5m per annum, a maintenance and investment cost of £56m to 2023-4 and an outstanding debt of around £13m.

3.3.3 Taking the two bridges together, removal of tolls would amount to an additional subsidy from the taxpayer to the private motorist of around £439.5m, or around £26m per annum up until 2023. At a time when the Executive is rightly prioritising investment in public transport, we find this proposed subsidy of private motoring completely unacceptable.

3.4 The removal of bridge tolls would further damage the credibility of the Scottish Executive's Climate Change Programme

3.4.1 The transport sector is one of the principal contributors to climate change. There is now widespread acceptance that climate change is real, that it is already having damaging impacts across the planet, and that these impacts will worsen. Yet despite a now high level of awareness of this issue, there is however little evidence that the Scottish transport sector is taking measures to reduce emissions: car use and road freight levels continue to increase, while progress on vehicle efficiency is limited at best.

3.4.2 Action to reduce the price of car commuting across the Forth Road Bridge could only be read as a specific encouragement towards long-distance car commuting – the very policy that the sustainable transport policies espoused by the Scottish Executive (in its Climate Change Programme and its draft National Transport Strategy) seeks to deter.

3.5 The removal of bridge tolls would represent a further reduction of private transport prices, despite this mode of transport already not paying for its external costs

3.5.1 The pressing economic, social and environmental problems of traffic congestion, air pollution and climate change are to a large extent caused by over-dependence on the private car and road freight. This situation has come about for a number of reasons, but the most transparent of these is the failure of private motoring and road haulage to reflect the cost they impose on the environment.

3.5.2 Contrary to the frequent statements by motoring organisations of the "hard-pressed motorist", the simple fact is that over recent decades the real price of motoring has not increased. Private motoring is more affordable today than it was 20 years ago, while the price of public transport has risen: since 1980, bus and rail fares have risen by 37% in real terms.[i] Future projections suggest that without action being taken, that the price of private motoring will fall by 29% between 2000 and 2010 and a further 24% by 2025.[ii]

3.5.3 There have been no increases in taxes on petrol over the last two years. Increases in fuel duty planned by the Treasury have been scrapped in response to rising oil prices and pressure from motoring and road haulage groups. In Scotland the percentage of fuel price that is taken up by taxes is lower today than it was in 1996.[iii]

3.5.4 Furthermore, and crucially, the transport sector does not cover its external costs. It is estimated that road taxation covers only one-third to one-half of the costs private car users and haulage companies currently impose on society and the environment. The University of Leeds' Institute for Transport Studies report, commissioned by the UK Department for Transport, *Surface Transport Costs & Charges*,[iv] in what remains the most comprehensive report of its kind in the UK, reported that:

> *"For the British road sector as a whole, taxes and charges in 1998 covered between one third to a half of their relevant marginal social and environmental costs, depending on the range of the cost estimates examined. Congestion costs, making up some two-thirds of overall costs, are the most important cost category, followed by environmental costs, accident costs and infrastructure maintenance."*

3.5.5 The authors were subsequently quoted as saying that *"far from being over-taxed, motorists pay only a third to a half of the costs they impose on society... [The report] claims the cost of congestion, pollution, infrastructure maintenance and accidents far outweighs the £32 billion fuel and car taxes collected each year"*.[v]

3.6 The Scottish Executive should take action to address public perception of tolling

3.6.1 We believe that the public opposition to tolls has been overstated by the media and some politicians. This is underlined by the fact that, despite the thousands of users of the Forth Road Bridge, only two people objected when the £0.80 toll was proposed to be raised to £1.00. As was underlined by the Scottish Executive's consultations in July 1999 and February 2000, there is general public acceptance of tolls so long as they are seen to be fair.

3.6.2 According to the consultation responses, a fair tolling regime is one where the revenue is ring-fenced for local transport projects; where the revenue is genuine additional transport investment, and where there is transparency in the regime. It is also clear from consultations that most respondents support the use of tolls to encourage modal shift.

3.6.3 However, despite any perceived or genuine public opposition to tolls, we believe that public perception should not determine the future of any tolling regime. Other factors, such as managing traffic demand; funding maintenance and operational costs; managing the environmental and social impacts of traffic and investing in transport networks are, we believe, of greater importance.

3.7 Specifically, the Scottish Executive should take action to challenge the myth that the presence of tollbooths generates extra traffic congestion

3.7.1 It is important to reiterate the fact, clearly laid out in the Phase Two Report, that the tollbooths at the Forth and Tay bridges have no direct effect on traffic flows. This is because, on the Forth, the capacity of the toll plaza is higher than the capacity of the bridge itself; and on the Tay, the congestion issue is the relationship between traffic waiting to cross the bridge and other city centre traffic.

3.7.2 Clearly, the tollbooths themselves are not contributing to congestion, and any attempt to claim otherwise is a distortion of the truth.

4. Concluding comments

4.1 Existing levels of road traffic are a major problem for the environment, for public health, and for the economy. Traffic levels also have a major damaging impact on the global environment, and in particular as a major contributor to climate change. For progress to be made in reducing traffic congestion, and for tackling emissions from transport, it is imperative that the price of road use rises so that it more closely reflects the costs it imposes on the economy, society and the environment.

4.2 The impact of removing bridge tolls would be to: increase road traffic levels, pollution and congestion; act as a specific encouragement to long-distance car commuting; and represent a clear financial transfer from the general taxpayer to road users, despite road users failing to pay for the damage they already cause.

4.3 Whilst it may be very tempting to support populist demands for reducing the price of road use, such a policy can only lead to an intensification of the problems of the transport sector, and the worsening of the sector's external impacts. For these reasons, we can find no compelling case why the Scottish Executive should remove bridge tolls.

4.4 Finally, we remain critical of the Scottish Executive's failure to support FETA's road charging proposals for the Forth Road Bridge, and its ultimate decision to reject FETA's Application in Principle for a road user charge. We hold that if the Scottish

Executive is not prepared to support local plans for tackling traffic congestion, and having also failed to support The City of Edinburgh Council's 2005 congestion charging proposal, it is its responsibility to come forward with a national road pricing scheme for reducing traffic levels and pollution. It has so far failed to come forward with any such scheme.

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[i] Department for Transport (2005) *Transport Trends* 2005 Edition, Trend 2.6 - <http://www.dft.gov.uk/stellent/groups/dft_transstats/documents/page/dft_transstats_026281.hcsp>

[ii] Department for Transport (2005) *The Future of Transport: Modelling and Analysis* - <http://www.dft.gov.uk/stellent/groups/dft_about/documents/downloadable/dft_about_036814.pdf>

[iii] Scottish Executive (2005) *Scottish Transport Statistics: no 24* 2005 Edition, table 11.9 - <http://www.scotland.gov.uk/Publications/2005/08/25100154/01557>

[iv] University of Leeds Institute of Transport Studies (2001): *Surface Transport Costs and Charges: Great Britain 1998* - <http://www.its.leeds.ac.uk/projects/STCC/surface_transport.html>

[v] Quoted in Financial Times, 07/08/01.