

**TPS Response to :**

**SEVERN ROAD CROSSINGS : PROPOSED TOLL REDUCTIONS**

Department for Transport and Office of the Secretary of State for Wales

Submitted on 6 March 2017

**Transport Planning Society**

The Transport Planning Society is an independent institutional body based in England, established to facilitate, develop and promote best practice in transport planning and to provide a focus for dialogue between practitioners and others interested in the field. It is supported by four long established professional institutions – ICE, CIHT, CILT and RTPI - all of whom have an interest in transport planning within their own core activities.

The Transport Planning Society administers its own Professional Development Scheme for transport planners, leading to award (jointly with CIHT) of the Transport Planning Professional qualification which is the only professional qualification uniquely aimed at transport planners. The Society has 1400 professional members in the UK and elsewhere. Many of our members are active in highway planning and management, and have extensive experience of working on estuarial crossings and toll systems.

Our response has been drafted by the Policy Group within the Transport Planning Society Board, all of whom were elected by the membership as a whole. The Policy Group is in constant dialogue with other members of the Society and the views expressed here may be taken as representative of those held generally by our membership.

**Do you agree with the proposed reductions in tolls?**

We appreciate that the Government has already made commitments to reduce the tolls and we understand that the Welsh Government also believes that tolls should be reduced, if not abolished. We also understand the Government's commitment to retain tolls at a sufficient level to cover foreseeable operation, maintenance and debt repayment costs. There are therefore strong arguments in favour of reducing tolls once the Severn River Crossings come into public ownership.

However, we feel that several consequences of reducing tolls have yet to be understood and that it is premature to make the proposed reductions without further consideration of the issues.

Firstly, the Government is short of funds for many purposes, including transport, and to reduce the established funding stream available from the Severn Bridge Crossings does not seem helpful at this time of austerity. Maintaining tolls at their current level would generate surplus funds which could be used for a variety of associated transport purposes such as contributing to the costs of such projects as the planned

M4 Relief Road south of Newport, public transport improvements in the Bristol area (designed to reduce commuting by car) or subsidy to railfreight in the South-East England – South Wales corridor (designed to reduce HGV traffic on the M4).

We appreciate that current legislation and policy would prevent this from being as simple as it sounds but we make the general point that a surplus flow of revenue from Severn Crossing tolls could be invested to generate many other benefits.

Secondly, we are concerned that the estimated 17% increase in traffic resulting from the proposed toll reductions is not understood. What are these trips? If they are existing trips diverting from less suitable routes (eg through Chepstow) there is a benefit. But if they are additional or longer car commuting trips, then there is a question mark over the associated emissions and environmental impacts. If they represent an abstraction from rail, then similar air quality and climate change issues arise, especially given binding government commitments in this area. There are also concerns about their effect on congestion at locations remote from the Crossings, including local authority feeder roads to the M4/M5. On the other hand, if they are additional trips associated with a genuine unlocking of economic growth potential in South Wales, then there is a balancing wider economic benefit.

We consider that these 17% additional trips should be better understood before making any decision about toll reductions so that the wider behavioural, economic and environmental effects of the proposed toll reductions can be appreciated. It is less than satisfactory to simply let the trips occur without knowing their wider impacts and without any plan for managing these.

Our previous comments notwithstanding, we are content with a simplification of the toll levels but at the same time, we see scope for more refined scales of charges than are proposed in order to promote air quality and climate change objectives – for example, lower charges for buses and heavy goods vehicles whose emissions comply with the latest Euro regulations or meet other “clean” criteria, or lower charges for cars whose emissions lie below certain limits. That would be a small step in the right direction.

**If you have any views on the future of the TAG payment system, please provide them**

We support use of a TAG system which, as noted in the Consultation Document, offers more flexibility than a simple charge per vehicle trip. It could also be adapted to support the air quality and climate change objectives we have mentioned above. It would also facilitate implementing charges in both directions which would avoid the issue of the Chepstow diversion and this seems more equitable.

It also lends itself to free-flow operation which has obvious safety and economic benefits.

In the longer term, it could be incorporated into a national road pricing system although that is some time away.

However, we appreciate the fact that not all drivers have ready access to secure online payment systems at all times, and we advocate that provision is retained for payment at the time of use or shortly afterwards, especially for drivers making infrequent or one-off use of the crossing. This need not necessarily be at the Crossing. One alternative might be to position pay desks at the next motorway services. As a minimum, we recommend establishing a properly staffed centre for payment by telephone.

**If you have any specific comments on the legislative proposals, including the draft charging order, please provide them.**

We have no comments on this matter.

**Bearing in mind the advantages and disadvantages, do you think that the Government should consider the idea of introducing two-way free-flow charging?**

If TAG is introduced, then we recommend that it be applied to both crossings. This will maximise the scope for managing traffic using the Crossings on both volume and air quality grounds.