EDINBURGH, ROAD PRICING AND THE BOUNDARY PROBLEM: ISSUES OF EQUITY AND EFFICIENCY

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Postscript:

“One of the architects of Edinburgh’s controversial congestion charging scheme has admitted the tolls would not treat everyone fairly.

Giving evidence to the public inquiry into the scheme, John Saunders insisted it was not fatally flawed but elements were unfair.

The admission could have a major effect on the outcome of the inquiry, which was set up to decide if road tolls would reduce congestion fairly. A ruling that the scheme is unfair could see the plan thrown out.

The problem relates to Edinburgh residents living outside the outer cordon, who are exempt from the toll but will benefit from the resulting improvements to the transport system.”

Herald and Post, 20th May 2004
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Introduction

Discussions of road user charging in Scotland have been confined to the proposed introduction of road user charging in Edinburgh. This report summarises the findings of a research study into some of the equity and efficiency issues surrounding the proposed introduction of road user charging in Edinburgh. Each road user pricing scheme is extremely dependent upon the specific context in which it is introduced and this report seeks to unpack some of the issues concerning the currently (Spring 2004) unfolding proposals for the scheme in Edinburgh. Using a review of the existing policy and academic literature, press reports, telephone interviews, physical interviews and reviewing the precognition statements to the Public Inquiry on Congestion Charging in Edinburgh, this report provides a stakeholder analysis of the Edinburgh Road User Charging policy environment.

High levels of vehicles use and congestion result in a number of costs including: slower travel and increased journey times; extra business costs and reduced competitiveness due to the lack of transport reliability and uncertainty about travel times, deterring new investment and encouraging decentralisation of businesses and other employers and leading to limitations on economic growth; environmental damage such as noise and air pollution; reduced quality of life for residents; reduced attractiveness to visitors and tourists; and high road injuries and fatalities, especially amongst children. There many methods to try to manage transport demand through changing travel behaviour (how, when and where people travel), including road user charging. Traffic demand schemes are likely to include a number of elements (e.g. parking strategies and improved public transport) and the actual impacts of any particular scheme will depend on factors such as its individual characteristics, the interaction between the policy elements and public reaction. The impacts of any scheme may vary considerably according to whose perspective is considered (for example by: user mode such as car or public transport users; those travelling from different areas including local car drivers, car drivers from elsewhere; those travelling for different purposes, such as those going to work or going shopping or tourists; residents in different parts of the city), although any individual may be in many different groups at different times (e.g. someone cycling to work, but driving to shop).

Road pricing in Edinburgh is currently being actively considered by the Scottish Executive and the City of Edinburgh Council and is the subject of an on-going Public Inquiry. Road user charging is already operational in London. However, the associated equity and efficiency issues have received limited attention and there is a need to have a better understanding of the costs and benefits of anti-congestion policies on different groups of people, economic development and labour markets (McQuaid and Greig, 2001, 2002). In particular, there are important displacement and other effects around the boundary cordons of road pricing areas, the main focus of this report, and linked wider labour market and efficiency implications. Other

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1 There are major differences between the London and Edinburgh road user charging scheme. In London it is located at the centre of the city and shares no boundaries with any local authority external to London, so that the impact on the boundary hinterland fell under its own authority. The Edinburgh scheme shares boundaries with external local authorities and also acts as a major services centre for surrounding local authority areas. The London scheme covers only a very small fraction of the city, while Edinburgh’s covers most of the city. Also the London scheme covers primarily business districts and, unlike Edinburgh, covers relatively few households within its boundaries.
implications include the provision of social and other services (especially as staff and clients may be affected by road user charges). Indeed, the Department for Transport has recently commissioned research on the design and implementation of a new system for charging for road use in the UK which includes consideration of fairness, respect of privacy and promotion of social inclusion and accessibility. Similarly, the Commission for Integrated Transport (2003) has argued that it is vital that the social inclusion aspects of transport policy are addressed explicitly as the government’s 10 year Transport Plan is rolled forward. As Edinburgh considers road user charging, the importance of tools to investigate social equity issues cannot be overlooked, yet the present policy search for such tools and related measures has been limited.

This report provides a review of literature and experience elsewhere concerning the efficiency and equity issues associated with the introduction of road pricing and applies them to the Edinburgh case. The report also reviews public, business and academic opinions on road user charging in Edinburgh in order to explore the potential efficiency and equity issues, which have been identified by stakeholders in relation to such a charging scheme. In summary this report explores the social equity/inequity and business efficiency/inefficiency potentially present in such a scheme from the perspective of a range of different stakeholders with specific attention being placed on problems at the boundary.

The report reaches the understandings that:

- Much of the affected public does not fully appreciate the operational character of the scheme and its likely impacts upon trip making
- There is considerable controversy around both the scheme itself and the consultation procedures which have heralded the scheme
- There are perceived inequities within the road user charging scheme and such inequities have been publicly acknowledged by the scheme’s champions
- Business interests have forecast negative impacts on centre city shopping
- Small businesses located outside the city, but servicing the city, are likely to be negatively impacted – plumbers, white goods repairers, etc.
- The Edinburgh scheme is characterised by shared boundaries with other local authorities (which declare themselves inadequately consulted and adversely affected by the scheme), and this creates further problems
- In order to ensure that the needs people have identified in this study are explored and amelioration of their difficulties prioritised, a tool such as an equity audit could be employed for all road user charging schemes
- There appears to be a conflict between the City of Edinburgh publicly expressed statements on the success of its consultation in respect of the road user charging scheme and the level of controversy and character of comment expressed at the public inquiry.

Section 1 of the report gives an overview of road user charging in Edinburgh. Section 2 sets out a matrix of potential impacts and stakeholder views. Section 3

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2 See: Road user charging feasibility study @ http://www.dft.gov.uk/stellent/groups/dft_transstrat/documents/page/dft_transstrat_024124.hcsp [May, 2004]

3 At the time of writing, the public inquiry into congestion charging in Edinburgh had just begun and stakeholder opinions were being revealed as the inquiry progressed. This report reflects views that were in the public domain by 2nd May 2004, and opinions expressed during interviews between April-June 2004.
provides a context for the matrix and Section 4 describes the particularities of the Edinburgh case. Section 5 makes some policy recommendations.
Section 1 - Road user charging in Scotland: equity, efficiency and the Edinburgh discussion

1.1 Road user charging in Edinburgh: an introduction

In this section, we provide a brief overview of the context in which road user charging is being considered for Edinburgh and give a short synopsis of the scheme that is being proposed.

In a review of the current prospects for the economic, environmental and social development of Scotland's main cities, the Scottish Executive (Building better cities: Delivering growth and opportunities @ http://www.scotland.gov.uk/library5/finance/bbcs-00.asp [April, 2004]) reports that:

“Edinburgh’s major economic success story is borne on the back of growth in financial, business services, public administration and cultural/entertainment sectors - the right economic mix at the right time.”

Yet, in the same report the Scottish Executive cautions that the City’s success may now be leading it to experience a number of key challenges, including traffic congestion:

“Edinburgh is coming up against constraints to future growth: tight labour market, significant house price inflation, high commercial rentals, traffic congestion, pressures on the green belt. Its key challenge is ‘growth management’, and this challenge is not a temporary one - both population and the number of households are projected to increase in the future. Edinburgh will need to manage its transport system for business, its use of land, ensuring new sites for both housing and business, and managing the spread of business actively outwards, with all that entails for transport, planning and housing. The pressures for growth risk damage to quality of life, one of the mainsprings of Edinburgh as a business and residential location.”

The City of Edinburgh Council also reports that Edinburgh has experienced road traffic increases associated with economic growth in recent years:

“The Edinburgh area has experienced enormous economic growth in recent years. This has led to thousands of new jobs, a growing population and a rise in the number of people travelling into and around the city, especially by car. Traffic on some of the main routes into the city has increased by over 60% in the last 20 years. Over time, traffic congestion has increasingly affected larger areas of the city for longer periods of the day. Further increases are forecast in future years as traffic levels continue to rise.”
(The New Transport Initiative @ http://www.edinburgh.gov.uk/traffic/NTI/ [March, 2004])

Rye and Wilson (2002) have also commented on the link between economic success and the problems of traffic growth in Edinburgh stating that the city “continues to enjoy economic success and consequently its transport system is under considerable stress.” The problems of traffic growth are not unique to Edinburgh. Indeed, cities such as Glasgow and Aberdeen have long experienced serious congestion at peak times and have experienced increases in traffic levels in recent years. However,
Scottish experience of road user charging has been limited to the investigations of the viability of such a scheme for Edinburgh:

“…why does Scotland’s Capital seem to be going it alone with the idea north of the Border, when Scotland’s roads have seen an 18 per cent increase in traffic in the past decade? For despite traffic congestion being a national issue, Edinburgh is the only Scottish city authority looking at introducing the road toll.”

(Fettes, 2004 @ http://news.scotsman.com/features.cfm?id=241302004 [March, 2004])

Previous work on road user charging in Edinburgh has largely focused on factors such as institutional viability and technological aspects of the scheme albeit with some recognition that issues of equity require addressing (http://www.progress-project.org [May, 2004]). This is not unlike the focus of research in other cities considering similar schemes where discussions of institutional viability have also often been accompanied by examination of technology issues:

“The broader adoption of urban road-user charging schemes rests significantly on the extent to which they become acceptable to public opinion, according to a report released today by Standard & Poor’s Ratings Services ‘Technology issues used to be identified as the major obstacle to congestion charging schemes, but this is no longer the case,’ said Standard & Poor’s Infrastructure Finance credit analyst Robert Bain. ‘The emphasis has shifted to public and political acceptability.’”


There is a need to open up the examination of congestion charging schemes to a wider perspective which includes looking more closely at issues such as equity as well as efficiency. Such approaches can help achieve the shift in focus described above towards an emphasis on public and political acceptability. Bae and Mayeres (2003) underline the importance of examining not only the efficiency of the transport instruments themselves but also state that “a sound understanding of the equity impacts of transport policies is crucial for determining their political acceptability”. In terms of efficiency, Bae and Mayeres are concerned with the internal economic efficiency of the congestion charging instrument (revenue generation) rather than the wider economic efficiency of the business community that is impacted by the scheme and related economic development issues. In line with the recent work of Professor Michael Bell, Imperial College, University of London (Bell et al., 2004), who has identified the negative impact of the London congestion charging scheme on retail trading in London, this report explores business efficiency issues. It takes this broader view of identifying the potential effects of congestion charging on the activity of commercial organisations and service providers from the stakeholders’ perspectives.

In summary this report explores the social equity/inequity and business efficiency/inefficiency potentially present in such a scheme from the perspective of a range of different stakeholders with specific attention being placed on problems at the boundary. Before discussing stakeholder views on potential road user charging experience, we take the opportunity to provide a short synopsis of the scheme. The proposed scheme is described on the website of Transport Initiatives Edinburgh (tie)4

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4 Tie was formed in May 2002 to deliver major transport projects for the City of Edinburgh Council (CEC). Tie is a private limited company, wholly owned by CEC. It is a non-profit making organisation which provides the procurement, project management and finance management capability to ensure that a number of major transport related projects are delivered. These include the West Edinburgh Bus System and the proposed tramlines. The
The Proposed Scheme

• Charging from Monday to Friday only
  No charge at weekends or public holidays
• Two charging cordons
  - City centre cordon operating from 7am to 6.30pm
  - Outer cordon inside city bypass operating from 7.00- 10.00 am
• £2 charge, only one charge each day, no matter how many times you cross either cordon
• After introduction in 2006, the charge would be linked to inflation
• Charge would only apply to vehicles entering the city. No charge would be made for crossing either cordon on trips heading out of the city.
• Drivers would be able to choose from a wide range of methods to pay the charge: ticket machines, internet, mobile and payment at shops. Payments could be made on a daily, weekly, monthly or annual basis.

Exemptions:

• Emergency vehicles, motorcycles, all taxis licensed under the Civic Government (Scotland) Act 1982, all buses and coaches including taxibuses and vehicles used for the transport of disabled people, blue badge holders, purpose built breakdown vehicles operated by accredited breakdown and recovery organisations and registered car club vehicles will be exempt.

Residents of Edinburgh, living outside the outer cordon (incl. Currie, Balerno, Juniper Green, Ratho, South Queensferry, Kirkliston), would be exempt from paying the charge at the outer cordon.

The City of Edinburgh Council's intention is to defer a decision on the introduction of congestion charging until after a public inquiry and subsequent affirmative referendum in Edinburgh. Priorities will be determined by relevant local authorities.

The scheme will operate for 20 years from the actual date on which charging starts.

On any charging day, details of vehicle registration numbers for which a charge has been paid will be held on a database. This will be compared with vehicles identified at the charging cordons as liable for the charge.

A penalty charge would be payable if the standard charge had not been paid by midnight on the day cordons are crossed.

The penalty charge is proposed to be the same as a parking penalty charge – currently £60.00 with a 50% reduction for payment within 14 days, rising to £90.00 if the penalty is not paid after 28 days.

Source: Transport Initiatives Edinburgh (http://iti.tiedinburgh.co.uk/)

company is also responsible for the further refinement of the proposed congestion charging scheme ('The company' @ http://www.tiedinburgh.co.uk/company.html [March, 2004])
In economic theory, the road user charges should reflect the external costs caused by the motorist, as for an efficient use of the road space the marginal costs should equal the marginal benefits (including the social as well as private costs). The main external costs include congestion, accidents, air and noise pollution, contribution to global warming, damage to buildings, visual impact, physically dividing communities etc. Costs are generally much higher in urban areas, than say on a motorway or in a rural area, and higher during peak times when there is greater congestion. It is important that people recognise these full costs so that any user charge is not seen as simply a method to maximise tax revenues. In this paper we have not considered the many alternatives for setting the road user charge or the level of the charge (which may vary by time of day, vehicle, duration of trip, passenger numbers, damage caused, specific roads etc.), but have based it upon the current proposals. A further factor to consider is the costs of gathering and paying the tolls (transaction costs). These may vary by user but in this report we are accepting the existing proposals.
Section 2 - Road user charging in Edinburgh: matrix of impacts and stakeholder views

2.1 Perspectives on road user charging in Edinburgh

“Charging schemes have the potential to make significant reductions in congestion and to improve the capacity, speed and reliability of public transport, but it is important that such schemes are designed to enhance the urban environment. Schemes which merely displace traffic from a city centre to suburban or inter-urban road networks may cure urban congestion at the price of urban decline, and will lead to problems elsewhere on the road network.” (Summary of Conclusions and Recommendations of Select Committee on Transport: First Report – Urban Charging Schemes (2003)
(http://www.parliament.the-stationery-office.co.uk/pa/cm200203/cmselect/cmtran/390/39003.htm [March, 2004])

In this section, we turn our attention to the views on road user charging in Edinburgh which our research revealed. These perspectives are summarised in a matrix format in Figure 1: the detailed commentary which informed this matrix is provided in Appendix 1. The summary matrix of stakeholders' views is followed by a discussion on the views provided. The views expressed have been divided into potential impacts within and outwith the boundary, as these two spatial perspectives help facilitate the later discussion of equity and efficiency issues. By boundary, we mean the outer cordon. In addition, within Appendix 1, the opinions have been divided into categories in order to reflect the stakeholder group to which the person expressing the view belongs.

Stakeholders considered were groups (within and outwith Edinburgh) involving: large business, small business, local politicians, disability and equal opportunities groups, adjacent local authorities, affected local authorities, government departments, police, the health sector, transport academics, transport lobby groups, the transport sector, voluntary sector/community and umbrella groups, utility companies, and the general public (see Appendix 1 for details). As Langmyhr (1997) noted, however, care must be taken as impartial arguments may be used as cover-ups for selfish interests.
Figure 1 Matrix of stakeholder views and potential efficiency and equity impacts – summary table

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<tr>
<th>Within boundary</th>
<th>Efficient</th>
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<th>Outwith boundary</th>
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<td>Without public transport improvements, the retail sector may suffer.</td>
<td>Congestion charging can improve traffic flow but business should also implement improvements to their transport policies that help lessen congestion.</td>
<td>Public acceptability may be unduly influenced if potentially affected groups feel they have not been adequately involved in the consultation process.</td>
<td>The system should be fair and equitable, focused primarily on those who continue to choose to use their own private transport when there are suitable public transport alternatives available.</td>
<td>The proposals impose a tariff on the free movement of staff, customers and goods to and from Edinburgh and this will impact on businesses in adjacent local authorities.</td>
<td>Some businesses may relocate from the city centre in areas outside the cordon, resulting in economic gains for these locations.</td>
<td>Exemption for Edinburgh residents outside the cordon but not for residents of other local authorities who live at a similar distance from the centre is unfair.</td>
<td>Congestion charging can provide the finance for public transport improvements that are needed for people living in affected authorities outside of Edinburgh.</td>
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<td>There is potential for adverse impacts on economic vitality through downturns in sectors such as leisure.</td>
<td>A properly considered congestion charging scheme is needed to tackle congestion.</td>
<td>The process of consultation should be transparent.</td>
<td>There are too many people using their cars and they should pay a higher price for doing so.</td>
<td>Businesses in areas around Edinburgh have not been included in consultation on economic issues around charging.</td>
<td>There is potential in congestion charging in Edinburgh to deliver benefit for residents of the rest of the Lothians, Fife, the Borders and beyond.</td>
<td>Proposed public transport improvements in adjacent authorities may not be sufficient to balance the impacts of a charge on residents’ opportunities to</td>
<td>If the revenues from charging are invested in public transport, people on lower incomes benefit from road charging on the whole as these people use public transport more.</td>
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<td>Business competitiveness may be undermined by rises in delivery charges as a consequence of lack of exemptions for delivery vehicles.</td>
<td>Congestion charging will only serve to punish certain groups of people.</td>
<td>Exemptions for disabled groups must include institutional vehicles to allow mobility impaired equality of access.</td>
<td>There is a suggestion that congestion may increase just beyond the boundary as vehicles (e.g. despatch drivers) adopt new operating practices (transferring packages between vehicles within and without cordon) to avoid paying the charge.</td>
<td>The scheme is an investment opportunity that will provide Edinburgh and southeast Scotland with the transport system that it will need to satisfy the demands of an ever-growing population.</td>
<td>Some drivers feel having to pay to enter their city will have a negative impact on their quality of life. It is seen to be fair that those non-Edinburgh residents who drive into Edinburgh are charged for the pollution and congestion that Edinburgh's residents incur as a result.</td>
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<td>Along with public transport improvements, charging can lessen congestion. Congestion charging should fund public transport improvements but London scheme has not been successful in doing so.</td>
<td>There are concerns about personal safety if women find they have to use the buses instead of their cars when a charge is introduced.</td>
<td>The charge is likely to affect higher income groups most, while lower income groups may make the most gains from improved public transport arising from the revenue raised by charging.</td>
<td>There is some concern that businesses on the periphery of Edinburgh, immediately outside the cordon, may be most affected.</td>
<td>The charge will discriminate against low income residents of adjacent authorities who travel to work in Edinburgh.</td>
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<td>Congestion charge may result in car-based tourists bypassing the city.</td>
<td>Breakdown vehicles will be exempt from the charge because their activity lessens congestion.</td>
<td>Since the scheme is designed to deal with car commuters, there are concerns about it affecting non-commuters who are not the main contributors to congestion.</td>
<td>The principle beneficiaries of the scheme will be the households that do not have access to a car.</td>
<td>If ambulance car drivers, taking people to hospitals in Edinburgh, have to pay the charge, the ambulance service would see substantial increases in annual operating costs.</td>
<td>There is a perception that the charge would be a road toll - an unfair tax on people living outside Edinburgh.</td>
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<td>Cost of delivering business mail could increase substantially.</td>
<td>Congestion charging will enable the provision of necessary public transport to benefit businesses, workers, shoppers and tourists.</td>
<td>With increasing numbers of groups being granted exemptions, there is some doubt about the scheme’s potential effectiveness.</td>
<td>The Council has communicated the reasons why charging is so important.</td>
<td>Midlothian will be marketed as an alternative business location to Edinburgh.</td>
<td>People from outside of Edinburgh do not feel they have been adequately involved in consultation.</td>
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<td>There is the prospect of closure of small business such as despatch firms because of increased operating costs.</td>
<td>Quality of life will be improved through better public transport paid for by the charge and reduced journey times, pollution, noise and injuries.</td>
<td>Any congestion charging scheme should be applied equally and to everyone.</td>
<td>There may be legal obstacles to revenue sharing with neighbouring councils.</td>
<td>With crematoriums being located in the city of Edinburgh, it is considered inappropriate that people from surrounding areas will incur a charge while attending</td>
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<td>Introduction of a charge may adversely affect property prices within the city is businesses relocate outside of the cordon.</td>
<td>Edinburgh would grind to a halt without the congestion charge.</td>
<td>Congestion charging alone could adversely affect equity: road space vacated by people who are deterred by the charge could be occupied by the wealthy, who are less price sensitive.</td>
<td>There is concern that patients attending clinics may either miss appointments because they do not want to pay the charge or try to use the ambulance transport service in order to avoid the charge.</td>
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<td>Shoppers may travel to out of town and other urban centres.</td>
<td>Congestion charging may reduce unnecessary journeys.</td>
<td>Less car travel may not result in fewer crashes: it depends whether journey times are shorter because of less time queuing at junctions or because of higher speeds. If traffic reduction is greater than was predicted, travel speeds may become substantially faster. While shorter journey times could reduce exposure to</td>
<td>Over a third of people with the lowest income have access to a car: they are potentially most at risk from suffering adverse effects of a congestion charge.</td>
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<td>The granting and administration of exemptions needs to be clear and effective.</td>
<td>It seems a small price to pay for cleaner air.</td>
<td>Road tolls are like VAT, which is generally considered to be a regressive tax.</td>
<td>There is some concern that non-Edinburgh residents will be paying for improvements that will benefit the residents of the city.</td>
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<td>Small businesses may be particularly vulnerable to economic impacts of a charge.</td>
<td>The charge will deliver better public transport and, in so doing, will deliver more visitors to Edinburgh.</td>
<td>It is considered over-simplistic to say that by improving public transport, poorer families benefit at the expense of the richer.</td>
<td>The proposal is seen as discriminatory against lower income commuters from West Lothian.</td>
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<td>The provision of exemptions may potentially undermine the scheme's success.</td>
<td>Access for emergency vehicles may improve.</td>
<td>In congestion charging, equity is seen as a key issue, but one that has received relatively little attention by academics or practitioners.</td>
<td>Before charge introduction, up front public transport investment is required.</td>
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<td>With rates higher in Scotland than the rest of the UK, an additional charge on a business may</td>
<td>Hypothecation of revenues into public transport and the environment have the</td>
<td>There is a perception that Edinburgh is ‘anti-car’.</td>
<td>The charge is considered to be divisive and unfair.</td>
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<td>Render it even less competitive in the wider UK market.</td>
<td>Potential to enhance business performance and location in a charged city centre.</td>
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<td>For Fife, the effect (of charging) is doubled since commuters already pay a toll at the Forth Road Bridge.</td>
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<td>The charge would be a blunt instrument that would negatively impact the business community while not achieving the objective of improving the environment either.</td>
<td>High level office functions (e.g. corporate head offices, international consultancies and finance, marketing, management, insurance, publishing, and advertising) are willing to pay a premium for a prestige city-centre location and tend to agglomerate in a ‘few choice centres’ due to ‘an inertia that would be strong enough to override any effects’ of a road user charge.</td>
<td>Congestion charging should not discriminate against anyone who, as a result of mobility problems, cannot access public transport and therefore use a vehicle to get to and from work.</td>
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<td>Additional costs as a result of the charge may adversely impact sectors such as health care which are already cash-strapped.</td>
<td>Tourists may find Edinburgh a more attractive destination if congestion and poor environmental effects of traffic are lessened.</td>
<td>It is considered unfair that central area residents will be required to pay the charge: since the inner cordon separates central area residents from many local facilities, they are</td>
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<td>Midlothian will consider a charge for non-Midlothian residents as a response.</td>
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<td>Without substantial complementary improvements to public transport, busy professionals such as doctors will find their personal efficiency affected.</td>
<td>Congestion-free streets are necessary for economic vibrancy.</td>
<td>There is concern about the burden imposed by charging on local clergy as the nature and scheduling of visits to people who are housebound, hospitalised or bereaved, as well as the conduct of funeral services, normally necessitate the use of a car. It is felt that it would be unreasonable to charge ministers £2 for driving to or from a funeral, or to pass on the charge to the bereaved or everyone visited in hospital.</td>
<td>Significant improvements to public transport are required to complement the charging policy.</td>
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<td>There may be more suitable alternatives to resolving the difficulties caused by congestion (e.g. pedestrianisation).</td>
<td>Congestion charging should be seen as an effective means of funding change in the quality of public transport in the whole</td>
<td>It is like a tax on the dead, if you charge funeral parties.</td>
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There may be difficulty assessing the true impact of introducing a congestion charge on the retail sector because of problems in isolating such impacts from national trends and local shopping patterns. Not getting people out of their cars will have a detrimental effect on Edinburgh’s economy and environment. There are fears that workers from outside Edinburgh on minimum wage would be unable to afford to continue to travel to Edinburgh to work.

Congestion charging may not result in behavioural change, thus congestion may not improve. Experience in London suggests that larger businesses report that the potential benefits flowing from improved transport speeds and reliability should reduce operating costs.

Without investment, public transport may not cope with increased passenger loadings as a consequence of charge introduction. Based on findings in London, it appears that journeys (for couriers) may be quicker and journeys more predictable, thus allowing companies to commit to tighter deadlines.

High parking costs in the city centre have resulted in increased cost to the Convenience stores’ observations in London suggest that
<table>
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<th>customer of goods and services: similar increases would be passed on under a congestion charging regime.</th>
<th>potential customer transport patterns have changed and businesses have been affected, some positively, some negatively. Chains of stores report that whilst some stores inside the zone have seen volumes decline, others are benefiting from the change. The picture therefore appears to be relatively balanced inside the zone.</th>
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<td>A charge may be financially disadvantageous to essential car users in the public sector, thus affecting service provision.</td>
<td>Long term prosperity of Edinburgh requires a charging scheme</td>
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<td>There is potential for a reduction in taxi fare revenue because of decreased journey times after charging is introduced.</td>
<td>Some form of traffic demand management must be implemented if economic growth is to be maintained.</td>
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<td>As operating costs increase for suppliers of businesses such as convenience stores, additional cost may be passed on to the store or operational changes made (cut back of number</td>
<td>London’s experience indicates that a charge ‘frees up the city’.</td>
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of deliveries) which would affect quality and range of goods for sale.

There is a danger that congestion charging may lead to bed blocking and more patients being admitted to hospital.

It will impose disproportionate damage to the local economy and would be preferable as a single cordon scheme.

The scheme is unnecessary and unwanted.

It would cause significant problems around the inner and outer cordons.

A large proportion of car journeys would not have to pay the charge.

Workers on low pay, such as new police recruits, may be particularly affected since they are forced to live outwith Edinburgh because of high property prices in the city.

Voluntary services that are complementary to NHS services may be adversely impacted.

Restaurants and cafes may suffer a downturn in
daytime trade.

The charge will have to be passed on to the business community.

The distribution and catering sector is the sole sector which carries a negative value impact.

Trade and commerce will be driven away from Edinburgh.

Smaller businesses may be particularly vulnerable to increases in operating costs as a result of the introduction of a charge.
2.2 Diverse perspectives, disparate impacts: discussion of the key issues

From the matrixed summary of views above, and from the detailed comments in Appendix 1, it is clear that congestion charging is an emotive issue for people both within and outside of the Edinburgh administrative boundary. The multifarious nature of views is reflected in a recent (March 2004) survey carried out for Transport Initiatives Edinburgh (tie) and conducted by the University of Westminster. This poll of more than 2000 people across south-east Scotland, asking for views on congestion charging in Edinburgh (‘Survey blow to the drive for road charges’ @ http://news.scotsman.com/topics.cfm?tid=477&id=254402004 [March, 2004]), both city residents and non-residents agreed something had to be done to bring down congestion levels. However, only 30 per cent said they would choose road tolls, while 43 per cent of people said they would vote against the proposals.

The survey also revealed that introduction of a charge would cause some behavioural changes amongst drivers, some of which may be beneficial in reducing traffic levels in the city but others may have potential for adverse impacts on economic vitality:

“More than 40 per cent of the car drivers surveyed admitted the charges would make them change their travel habits. This included switching to other forms of transport, making fewer trips by car and travelling at different times of the day. But many drivers would also choose to drive to different destinations, meaning shoppers heading to Glasgow instead of the Capital, a possibility which has already prompted traders to object to the proposals.”

(‘Survey blow to the drive for road charges’ @ http://news.scotsman.com/topics.cfm?tid=477&id=254402004 [March, 2004])

The concern about perceived risk to businesses’ economic viability is also demonstrated in a survey by the Edinburgh Chamber of Commerce of its members which found that:

“31% (were) opposed to any form of congestion charging with a further 33% opposed the current form. 7% were neutral and 28% were in favour – albeit in many cases with some modifications. Companies in distribution, manufacturing and retail were most opposed while financial and professional services, tourism and the public sector were least opposed.”

(‘Congestion charging – key findings of membership survey @ http://www.ecce.org/downloads/memberdownloads/iss3p9.pdf [March, 2004])

It appears that although stakeholders generally are aware that congestion is a problem in the city, they are less convinced that congestion charging is the appropriate solution. Amongst the general public, the factors undermining support for a charging scheme relate to concerns that: it would not generate the levels of revenue predicted or needed to make it viable; its success would be undermined by deficiencies in the public transport system; it would cause displacement effects around the cordons; and it would create inequity between residents of different geographic areas (e.g. city centre residents having to pay to cross cordons while people living outside of the outer cordon but within Edinburgh not having to pay to cross the outer cordon). Amongst the business community, concerns include impacts on: business competitiveness if footfall decreases; potential for operational efficiency to be detrimentally affected; and increased operating costs in general as a result of charge introduction. One aspect of gathering people’s views through surveys is that those who gain, or perceive that there will be gains, are often less vociferous than those suffering losses. Hence there are few comments about potential growth in
tourism or some leisure that may result from an improved less congested and more pedestrian friendly environment. Similar debates occurred before many pedestrian schemes were introduced in various cities and countries, with ex-post experience usually better than ex-ante expectations. However, road user pricing is much wider in geographical scale than most pedestrianisations, and so comparisons are limited.

For people outside of Edinburgh, there is concern about imposition of a charge on non-residents when some city residents will be exempt. In addition, there are indications that adjacent authorities do not feel that they, or people living in their areas, have been sufficiently included in effective consultation. This damages the potential for public acceptability of the scheme as the affected public interprets their lack of involvement or, where they have been consulted their perfunctory inclusion in consultation, as an indication that the scheme’s introduction is a fait accompli. The apparent suspicion with which Edinburgh’s scheme is regarded by adjacent authorities is highlighted in Midlothian Council’s non-agreement to compulsory purchase by City of Edinburgh Council of land in Midlothian for a park and ride site to serve Edinburgh:

“We have made it clear to Edinburgh that we will not be acting as their agents in this matter. Edinburgh will have to accept that there needs to be much more co-operation and involvement in projects of common interest than is evidenced by our recent experiences. They are the City Authority, they have greater resources, but on issues like transport they need to be much more receptive to the needs of neighbouring authorities and the impact of their proposals on other communities. We are about to go into the start of a public inquiry on congestion charging which is based on a policy designed to ease a city congestion problem, but where there has been little thought or concern given to the immediate impact on other areas…any congestion charge has to be fair and equitable and not skewed to protect Edinburgh residents at the expense of other communities.”


As we have seen, there are misgivings even within the city of Edinburgh about the operational impacts of charging. Lothian and Borders Police have apparently been exploring the possibility for moving their headquarters from Fettes in Edinburgh to Midlothian because of the charge (‘One is not amused by this ghastly mess’ @ http://news.scotsman.com/opinion.cfm?id=495812004 [May, 2004]).

Amongst the healthcare sector, the expansion of a free parking scheme for on-duty doctors and other health care workers (‘Free parking boost for city health staff’ @ http://news.scotsman.com/edinburgh.cfm?id=258552004 [May, 2004]) reflects an awareness within the Council of the impacts of constraints on access to patients in the community if car travel is complicated by parking difficulties at the destination. Despite the evident recognition that on-duty health professionals’ work is sometimes car dependent, concerns have been expressed that charging such workers may severely impact health care activities and impose a financial burden on the NHS:

“NHS Lothian’s chief executive, James Barbour, said healthcare resources would have to be diverted to cover the cost of workers paying the tolls in the course of their work. And he raised concerns about the recruitment and retention of staff, given that half of NHS Lothian’s employees live outwith the city boundary.” (‘United against Edinburgh road charges’ @ http://news.scotsman.com/topics.cfm?tid=607&id=86142004 [March, 2004])
Recognizing the needs of healthcare workers on one hand and then seemingly not paying them full regard on the other, appears to reveal a dichotomy of policy with respect to transport and healthcare. It can be argued that if true ‘joined-up’ governance is to be delivered issues such as this need to be overcome to allow complementarity of policies rather than potential policy conflict.

Moving from local views to the opinions expressed by transport academics, many have tended to concentrate on economic and network efficiency (see, for example, May et al., 2002; Eliasson and Mattsson, 2001; Ahlstrand, 2001). More recent work by Bell et al. (2004) indicates that other aspects of urban efficiency may be impacted by functioning congestion charging schemes: Bell et al. (2004) focus on the impact for retail business efficiency which appears on their evidence to be negatively impacted in the case of London. They argue that similar effects are to be expected in Edinburgh. Similarly Gerrard et al. (2001) carried out a survey of businesses and found that congestion charging and workplace parking charging were expected to reduce profitability, although this was an ex ante survey of attitudes rather than an ex-post impact evaluation.

2.3 Evidence from consultations

Towards the end of 2003, the City of Edinburgh Council carried out a consultation exercise asking 33 institutional actors to make comments on the proposed congestion charging scheme. This consultation closed in early January 2004 by which time 16 consultees had responded. The list of consultees is reproduced in Appendix 2.

This research study tried to contact all of the organisations who had not responded to the City of Edinburgh Council consultation to obtain their views on congestion charging. However, only three more stakeholders provided responses, which are summarized in Appendix 3.

Some of the views expressed by respondents in a Scottish Executive consultation on road user charging exemptions (‘Responses to Road User Charging Consultation On Exemption Regulations Under Section 54 of the Transport (Scotland) Act 2001’ @ http://www.scotland.gov.uk/library5/transport/ruchr-00.asp [May, 2004]) are considered particularly relevant to the Edinburgh context:

**NHS Argyll and Clyde**: suggest that some consideration is given to exemptions for those operating public transport to and from healthcare premises and to those persons travelling to provide health care. The reason for exemption is to take away barriers from patients or visitors attending healthcare premises and for ensuring that the costs of providing healthcare are not adversely affected.

**First Bus**: agree in principle with disabled badges being exempted from road user charging schemes but have some growing concerns regarding inappropriate and fraudulent use of these passes in recent years related to parking abuse. Road user charging is an additional incentive for those that may seek to falsely use these badges and a national review of the scale of abuse and the arising issues is urged…Failure to address this issue may result in a dilution of the positive traffic

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5 It should be noted that not all views expressed in the Scottish Executive Consultation are included here. Instead, only those comments that are relevant to the issues raised in this document have been reproduced. Some comments have been summarised and paraphrased, where appropriate, for brevity.
reduction benefits that road charging is designed to deliver and may also significantly add to the many localised congestion problems associated with illegal and inappropriate parking. Any such abuse will also significantly undermine public confidence and respect for the scheme and will add to the dilution effects.

**Transport Research Institute (TRi), Napier University:** The TRi would recommend two basic principles being applied to exemptions from road user charging schemes:

- that the exemptions are simple and easy to understand – the TRi reckons that congestion charging scheme may be quickly discredited if they have complicated wide-ranging exemptions; and
- that the exemptions are fair to all users.

Motor vehicles are the main cause of high traffic levels/congestion and noise/emissions. The TRi would also recommend that the majority of motor vehicle users be charged, to ensure the scheme does not become discredited, and raises enough revenue to be economically viable.

**Scottish Power:** the Scottish Utilities’ emergency vehicles and in particular Scottish Power’s Power Systems emergency vehicles should be excluded. They provide an emergency service, which often threatens ‘life and limb’, which is generally the same principle that applies to ambulances. The emergency vehicles often are called to fires, etc. which is similar to the fire service and they are excluded as per the regulations.

**SEPA (Scottish Environment Protection Agency):** SEPA believes that exempting any groups of people, classes of vehicles or types of activity should be kept to a minimum. Extension of the exemptions…could ultimately defeat the object of road user charging.

**Scottish Borders Council:** recommended that consideration should be given to exemptions for the following:

1. Special Needs Pupils - Some special needs provisions cannot be met in the rural areas
2. Funeral Corteges - Some rural areas have no cremation facilities, which some religious faiths require. Some minority faiths do not have places of worship in rural areas where their deceased can be received into, therefore a trip to Edinburgh is essential
3. Hospital outpatients - Some specialist treatments e.g. oncology and paediatrics are not available within rural areas
4. Hospital visitors - Patients that cannot be attended to locally are sent to the cities and still receive visitors
5. Taxis and Private Hire - Many rural areas do not have traditional ‘black’ cabs. Many special needs children are transported in private hire cabs
6. School buses - Good transport option
7. Minibuses - Multi-occupancy vehicles that are sometimes overlooked
8. Motorcyclists - They are an environmentally friendly option to the car

**Macmillan Cancer Relief:** Cancer treatment can be extremely draining for people, which means many of them are not well enough to use public transport and so have to travel by car. Typically, a course of radiotherapy treatment involves daily visits to a cancer treatment centre over a period of around six weeks. Therefore a person travelling to hospital by car could, if required to pay a road user charge, incur quite a substantial expense. Macmillan believes it is morally wrong that people who require regular visits to hospital for cancer treatment should be required to pay a road user
charge. This effectively amounts to a tax on cancer. Following representations by Macmillan, the Mayor of London is now proposing to amend the law so that cars used to transport patients who require regular hospital treatment, but who are too ill or weak to use public transport, should be exempt from the London congestion charge. Currently this exemption only applies to patients who receive means-tested assistance with travel costs but the proposed amendment seeks to remove the financial criteria.

Royal Mail: Charging Royal mail Group vehicles providing the universal postal service would fail to contribute to the objectives of road user charging, particularly in city centres where Royal Mail already discourages unnecessary journeys by car, vans, lorries and use of non-vehicular means is already optimised. It would add substantial costs to a public service on a scale not likely to be encountered by any other business or organisation. In doing so, the charge would become a tax on mail services with no compensatory benefits.

Scottish Water: Scottish Water has a statutory duty to provide and maintain the water and drainage infrastructure…In carrying out these duties, there are no transport alternatives available. We cannot avoid passage through charging zones; we cannot use other transportation arrangements or share them. When we are dealing with burst pipes or other critical situations, we are unable to delay access to city centre areas until quieter traffic periods. To delay would generate further traffic congestion, indeed chaos, as city roads became flooded. City centre areas are the locus of some of our most ancient and troublesome infrastructure. Non-exemption from charges would mean additional costs of operating in these areas and would have an impact on the very significant efficiencies that our regulator…expects us to make. These charges, if they were imposed on Scottish water, may have to be passed on to our customers, and again this may be difficult for our regulator and for Ministers to tolerate.

In addition to these concerns, City of Edinburgh Council (2000) in a report for the Europrice project on external stakeholder consultation stated that the Police in Edinburgh had expressed concerns relating to road safety issues such as the displacement of traffic. This was re-confirmed by a spokesperson for Lothian and Borders Police in an interview for this research.

### 2.4 Precognitions for the public inquiry: a key source of evidence

The Transport Initiatives Edinburgh (tie) website contains precognition statements for the public inquiry. There are 13 Council precognitions and 86 documents from objectors. Many of the main points which have been raised in the precognitions, from both sides, have been picked up by the local media and are included in the matrix of impacts and views in Figure 1 and Appendix 1. However, all precognitions to the public inquiry have been examined for this study to determine whether there are any other issues of efficiency and equity that should be included in this document. As all precognitions are in the public domain, the table below presents salient points only that relate to the specific objectives of this research.

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<tr>
<th>Name</th>
<th>Organisation</th>
<th>Issue raised</th>
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<tr>
<td>Councillor Andrew Burns</td>
<td>City of Edinburgh Council</td>
<td>“We believe to be fair and equitable to all residents of Edinburgh, this ‘wedge’ of residents [living outside the bypass but within the city boundary] (whom number around 30,000) should be exempted from any charge on the outer cordon only. This will treat all Edinburgh...”</td>
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<tr>
<td>Name</td>
<td>Position/Association</td>
<td>Statement</td>
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<td>Councillor Burns</td>
<td>Edinburgh Council</td>
<td>“Residents’ as fairly and equitably as feasible.” Councillor Burns argues also that these residents are Edinburgh Council tax payers “due to our political boundaries”. He goes on to state that “these boundaries are largely historic and not related to the existing road network.”</td>
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<td>Barry Cross</td>
<td>City of Edinburgh Council</td>
<td>“In 2001, for all trips made by Edinburgh residents, 52.8% were by car. The result is increasing congestion.” “One of the objectives for the scheme is to distribute benefits fairly among those who pay and means charge payers in Edinburgh will fund transport improvements within the city, while charge payers in neighbouring SESTRAN area will fund service and infrastructure improvements between their areas and Edinburgh.” From this statement, it would appear that residents of Edinburgh who do not pay a charge would not benefit from transport improvements funded by charge revenue. Yet, it is difficult to see how those Edinburgh residents who live outside the bypass (and therefore will not have to pay to cross the outer cordon) would not also benefit from improvements funded by those who pay. It would be very difficult to administer a system that only allows payers to benefit (e.g. only those who have paid a charge could use tram line funded through congestion charging revenue) which leads to the conclusion that there must be an inherent inequity in a system that charges some for the benefit of others who have been specifically granted a freedom from charging.</td>
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<td>Association of East Lothian Community Councils</td>
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<td>“Several areas in East Lothian are closer to the outer congestion charge cordon that those areas of Edinburgh that have been exempted from the outer cordon charge. This is perceived to be unfair and an example of how Edinburgh Council has manipulated Congestion Charging to favour its residents over others. Taxes/charges lose credibility to the extent that they are perceived as inequitable and that is the case with this perception.”</td>
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<td>Tony Bryer</td>
<td>Combined City Centre Business Association</td>
<td>“By having two cordons operating at different times, confusion about the scheme will be increased; already the survey of small businesses shows over 60% of then to be unaware of the days and periods at which charging will take place. For the shopper, who has a wide range of choice other than Edinburgh’s city centre, such confusion is a powerful deterrent to coming into the city.”</td>
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<td>Nick Ayland</td>
<td>Fife Council</td>
<td>“In omitting to make any charge on vehicle movements within the very large area between the two cordons, the proposed scheme has effectively introduced a significantly inequitable situation in which most Edinburgh residents’ congestion-causing trips are not subject to charge, while all trips that contribute to congestion in Edinburgh but originate outwith the City of Edinburgh administrative area are charged. Moreover, a scheme that charges such a low proportion of traffic movements within the target congested area will be much less efficient than it could be in combating congestion and raising revenue for transport improvements.”</td>
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<td>Name</td>
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<tr>
<td>Len Havard</td>
<td>Resident, Stockbridge Colonies</td>
<td>&quot;Residents within the Inner Cordon will be able to go virtually nowhere by car without incurring a 32 re-entry charge on returning home. The supermarket journey is just an example. One would be equally penalised for visiting the doctor, dentist, hospital, rubbish dump for re-cycling...Fair treatment can only be achieved for Inner Cordon residents by giving an exemption or significant concession...This would provide parity with the rest of the residents of Edinburgh.&quot;</td>
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<td>David McLetchie</td>
<td>MSP</td>
<td>&quot;The scheme will create additional congestion and parking problems in the area surrounding the city centre, as informal park-and-ride would be encouraged in residential areas immediately outwith the cordon. This is particularly likely to be the case around Wester Coates and Dalry, where the proposed inner cordon protrudes outside the proposed Controlled Parking Zone...Experience of the streets, adjacent to but outwith the Controlled Parking Zone, is that these streets tend to be used as free park-and-ride facilities by motorists who are not local residents. This is likely to be exacerbated by congestion charging.&quot;</td>
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<td>Alan Penman</td>
<td>NHS Lothian</td>
<td>&quot;40% of the Royal Infirmary of Edinburgh workforce live outwith the city. The cost implications for individuals are significant. With many NHS workers being paid modest levels, albeit recently improved, the impact of congestion charging will be keenly felt, and for some staff will prove a disincentive to work for the NHS in Edinburgh. There is particular concern about the potential secondary effect for NHS services should it become more difficult to retain and recruit staff groups in Edinburgh.&quot;</td>
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<td>Maria Francke</td>
<td>Universities Superannuation Scheme – owners Gyle Shopping Centre</td>
<td>&quot;The significance of the west Edinburgh area in itself is reason enough for the proposition to be dropped. The uncertainties of the economic modelling and the barely perceptible ‘marginal net benefits’ of the scheme do not instil confidence, when the nationally important west Edinburgh economy is potentially at risk. The eminent transport economists and independent reviewers have themselves stated that the economic impacts of such charges are less than certain...the Council should not be taking a risk in imposing an outer cordon charging scheme, when the affects of this on business can only be guessed at.&quot;</td>
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<td>Douglas Muir</td>
<td>Midlothian Council</td>
<td>&quot;While these exemptions (for Edinburgh residents outside the outer cordon) may provide equity of Edinburgh residents it is very obviously not equitable for Midlothian residents, or residents of other Council areas, who travel into the city on exactly the same sections of road as their Edinburgh neighbours. This implies that one driver contributes to congestion, whilst the driver of the car alongside him, if he is an Edinburgh resident, does not. It is also very difficult in this situation to see how one suffers any more or less congestion or pollution than the other. Nowhere, is this more clearly demonstrated than at Lothianburn on the A702, a major radial route into the city. Here residents on the west side of the road (Edinburgh residents) will not pay while their neighbours on the opposite (east) side of the road (Midlothian residents) will pay.&quot;</td>
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2.5 Equity across the road user charge boundary

Looking specifically at one of the recurring issues that has been found throughout this research and is exemplified in the comments made by Councillor Burns, Barry Cross and Douglas Muir above, albeit from different perspectives, we examine the concern about equity within and outwith the boundary in greater depth here. Councillor Burns argues that providing exemptions to residents of Edinburgh outside of the outer cordon is fair and equitable because these residents are Edinburgh Council taxpayers “due to our political boundaries”. He goes on to state that “these boundaries are largely historic and not related to the existing road network”. However, problems of equity attach to such an understanding. In the case of Lothianburn on the A702, it is the case that residents on one side of a road will be charged to cross the cordon whilst the counterparts on the other side of the road will not.

Furthermore, there are particular equity concerns if one looks at the social composition of a village like Danderhall which is within the Edinburgh city by pass but is formally located in Midlothian and compares it to an area such as Balerno towards the south-western boundary of Edinburgh and outside of the outer cordon. Danderhall is an ex-mining community with a large stock of social housing and Balerno is a commuter village with largely privately owned housing. The ACORN profiles of Danderhall and Balerno help describe the differences in the 2 communities:

**Danderhall**

**Type 41: Better-Off Council Areas, New Home Owners** (2.4 per cent of the population live in this ACORN Type).

**Likely characteristics**

These family, blue collar neighbourhoods are located all over Britain, although they tend to be found more in Scotland. Also, they tend to be found outside the major conurbations. This ACORN Type includes most of the New Towns of the 1960s – Cumbernauld, Stevenage, Redditch, Harlow, East Kilbride.

- Heavy TV viewing: **High**
- Ownership of stocks and shares: **Low**
- Microwave purchases: **Medium**
- Buying home with a mortgage: **Medium**
- 2+ Car Ownership: **Low**
- Population Aged 0-14: **High**

(Extract from: [http://www.upmystreet.com/inf/msc/det/?l2=EH14+7BB&l1=EH22+1LP&submit=Submit](http://www.upmystreet.com/inf/msc/det/?l2=EH14+7BB&l1=EH22+1LP&submit=Submit) [May, 2004])

6 ACORN stands for 'A Classification Of Residential Neighbourhoods.' There are 1.7 million postcodes in the United Kingdom, the average postcode being shared by around 14/15 addresses. The marketing-data firm CACI has produced this classification to include every street in the country, fitting them into 17 distinct Groups, which, in turn, contain 54 'typical' ACORN neighbourhood categories. CACI checks and updates its classifications annually, to reflect any evolution of an area and ensure that the area 'profiles' you read are as accurate as possible.
Balerno

Type 1: Wealthy Suburbs, Large Detached Houses (2.6 per cent of the population live in this ACORN Type)

Likely characteristics

This ACORN Type contains the most affluent neighbourhoods in Great Britain. They are wealthy, high status areas on the suburban/rural fringe which are found predominantly in the Home Counties, although there are enclaves in other parts of the country such as Bearsden, Milngavie and Eastwood in Glasgow and Solihull in the West Midlands.

Heavy ITV viewing  Low  Ownership of stocks and shares  High
Microwave purchases  Medium  Buying home with a mortgage  High
2+ Car Ownership  High  Population Aged 0-14  Medium

(Extract from http://www.upmystreet.com/inf/msc/det/?l1=EH14+7BB [May, 2004])

From this example, it would appear then that people in households with high levels of car ownership in Edinburgh neighbourhoods outside of the outer cordon and city by-pass are not going to be required to pay the charge yet those who live in Midlothian neighbourhoods outside the outer cordon but within the Edinburgh city by-pass may own one car because they work shifts or have to travel to look after elderly relatives will have to pay, purely because of a historic boundary. In terms of social equity, there is a need to design schemes so as to ensure historic geographical boundaries do not privilege one social group in respect of others. If the aim of congestion charging is to reduce the volume of cars using the roads, it is unclear how this objective will be achieved if residents of high car ownership areas are exempt.

To illustrate further, the ACORN profile of Balerno states that ‘levels of car ownership are very high: there are 3.5 times the national level of households with 3 or more cars. Cars are likely to be new, large and very expensive. The proportion of cars costing over £20,000 is nearly 10 times higher than average and the proportion of 2500cc+ cars is nearly 4 times higher than average. The incidence of company cars is also above average – at 13%, this is 3 times higher than the national rate.’ In comparison, Danderhall’s profile states that ‘Car ownership levels are modest - the proportion of households owning one car is 13% above average, but rates of multiple car ownership are much lower than average. Cars tend to be much older and there are very few expensive cars.’

Barry Cross states that:

“One of the objectives for the scheme is to distribute benefits fairly among those who pay and means charge payers in Edinburgh will fund transport improvements within the city, while charge payers in neighbouring SESTRAN area will fund service and infrastructure improvements between their areas and Edinburgh.”

From this statement, it would appear that residents of Edinburgh who do not pay a charge would not benefit from transport improvements funded by charge revenue, however, it is difficult to see how those Edinburgh residents who live outside the bypass (and therefore will not have to pay to cross the outer cordon) would not also benefit from improvements funded by those who pay. It would be very difficult to administer a system that only allows payers to benefit (e.g. only those who have paid a charge could use a tram line funded through congestion charging revenue) which leads to concern about apparent inherent inequity in a system that charges some for the benefit of others who have been specifically granted a freedom from charging.
As a corollary, granting exemptions to residents of Edinburgh who live outside the bypass/cordon has created a strong feeling amongst stakeholders that there is an unfairness in the system and a consequent expectation that exemptions should also be provided to residents within the inner cordon in order to restore parity to the system. Widespread exemptions can, however, only undermine the success of the scheme and leads to a questioning of the intent of the policy.

Turning now to the issue of consultation, there has been an apparent lack of detail available to consultees, see, for example, Bob McLellan’s precognition on behalf of Fife Council:

“CEC/tie have met deadlines but only by not having undertaken the necessary work, not taking key stakeholders with them and not engaging with them. What we are therefore left with... is a picture whereby the people of Fife and Fife Council and myself as Head of Transportation Services for Fife have little detail of what benefits/disbenefits might come our way when/if Road User Charging is introduced in Edinburgh. It is very difficult therefore to sensibly discuss proposals and their impact meaningfully with the citizens of Fife.”

(May, 2004)

Concerns about consultation have not only been expressed from outside the boundary. Indeed, even within the Edinburgh administrative area, consultation itself has been described as absent in some cases, see, for example, Blackhall Community Association precognition:

“As members of the public, whose views are supposedly represented in the City of Edinburgh Council’s own papers (including the Local Transport Strategy), I would be particularly grateful if you would note our position with regard to the consultation process and to the kinds of information which have been put before the public. We believe that the public has been short-changed in terms of factual information and that a politically-driven, property-developing agenda has taken priority over the public interest... the consultation process was flawed and... promoted congestion charging as a public relations exercise, not as a genuine public information service.

...Had we been able to get answers to questions in a local public forum, perhaps then some of our concerns could have been answered. Locally, many households never received either the first ‘Have Your Say’ or the second ‘Investing in Travel Improvements’ consultation leaflets.”

(May, 2004)

Confusions over the operation of the scheme have been highlighted in the precognition documents for the public inquiry:

“By having two cordons operating at different times, confusion about the scheme will be increased; already the survey of small businesses shows over 60% of them to be unaware of the days and periods at which charging will take place. For the shopper, who has a wide range of choice other than Edinburgh’s city centre, such confusion is a powerful deterrent to coming into the city.”

Combined City Centre Business Association.

Concerns that the footfall in the central area of Edinburgh will decline have been expressed by John Lewis Partnership, a retail chain which has already had a negative experience of the London congestion charging scheme (Bell et al. (2004).
The materials collected from the precognitions to the public inquiry indicate that there are concerns both about equity issues and efficiency issues in respect of the current Edinburgh congestion pricing scheme.
Section 3 - Contextualising the stakeholder perspectives matrix

3.1 The context in terms of other literature

Many of the issues raised by our Scottish stakeholders have echoes elsewhere in the literature. The issue of congestion affects both the transport of goods and in-work travel, and commuting to work. In city areas, in particular, the perception of congestion has led to the development of policy agendas to reduce the dependence upon private vehicles through an increased importance being place on public transport, and the development of traffic management schemes, including road user charging (McQuaid et al., 2003a). In terms of the economy, SACTRA (1999) argues that to overcome congestion and unreliability problems, substantial investment is needed to improve the existing network in the UK to ensure competitiveness, primarily road, heavy rail, urban public transport and airports. Sinclair (2001), researching road user charging within Edinburgh, argues that for a road user charging scheme to be successful, exemptions should be kept to a minimum. With reference to lower income workers in Edinburgh, Sinclair (2002) suggests there are no data readily available in terms of their trip patterns including origin and destination, travel times and travel mode - and how many may be affected by the proposals.

In respect of trip patterns, May (1999) suggests that any restraint measure will give rise to a range of responses by the driver, who may chose not to travel, to travel to a different destination, by a different mode, at a different time, or on a different route. He states that, in the longer term, such changes are likely to result in journey patterns which are less amenable to further restraint. Jakobson et al., (2000) estimated, in Sweden, that acceptance of road pricing is negatively affected by perceived infringement on freedom and unfairness which in turn increase with intentions to reduce car use. Income is negatively related to intended reduction in car use and expectations that others will reduce car use positively related.

In relation to impacts on the economy, May (1999) states that decisions not to travel, or to change to a different location, are likely to have an impact on the economy of the area affected. He goes on to suggest that:

“Conversely, those dependent on public transport, walking or cycling may be encouraged into the area, and the improvement in the environment there may provide a further incentive, as has been found with traffic calming schemes in German town centres (Hass-Klau, 1993). Because such responses take some time to occur, they are difficult to identify, and there is still considerable uncertainty over the power of predictive models to assess them. Not surprisingly, therefore, the negative reactions of traders and business in the affected area will be difficult to refute. This is an area in which more evidence is needed, although a recent UK report has concluded that it should be possible to design restraint measures so that they have a positive impact on the economy (SACTRA, 1999).” (Our emphasis).

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7 There is a wide management literature on stakeholder analysis which we do not attempt to consider here. Significant issues include: classification of stakeholders, multiple stakeholders, alliances between stakeholders, new stakeholder groups which arise in response to specific situations etc.
In Edinburgh the Scottish Executive (2000) found that many small local businesses in Edinburgh blame new style bus lanes for a decrease in turnover, mainly due to parking restrictions. Similar concerns have also been raised regarding congestion charging. There are examples of city-level transport investments having potentially adverse effects on business location and competitiveness. As mentioned earlier, many local businesses in Edinburgh have blamed new style bus lanes for a decrease in turnover, mainly due to parking restrictions (Scottish Executive, 2000). Similar concerns have also been raised regarding congestion charging in London and other UK cities. As discussed elsewhere, Goodwin (2003) reports findings of a study of city centre pedestrianisation schemes in Europe by Hass-Klau (1993) and also research by Carley and Donaldson (1997) indicate that retailers initially oppose such schemes, but become more enthusiastic over time, as the long run effect is often to increase footfall in urban areas. Goodwin notes that the success of such schemes is dependant on other transport and urban policies that are in place. For example, large-scale pedestrianisation in conjunction with a light rail scheme appears to be an effective combination, although the direction of causality is debatable.

May (1999) recognizes the need for complementary measures and controls on negative impacts. He sees equity implications, arising under the three broad headings of income-related effects, locational effects and need-related effects:

“The first is the most often cited, the argument being that any fiscal measure bears more heavily on lower income families. In practice the position is more complex, since lower income families are more likely to use public transport, and it is perfectly possible, as predicted in London (May et al., 1996), that the net costs are greatest for the highest income groups. Even so, the poorest car users who have no alternative to the car will be the most severely affected, and it is difficult to avoid this outcome. Location-related effects arise with all types of restraint, either because some live within the affected area while others do not, or because of the effects of rerouted traffic. They are amenable to design improvements, either by relocating the boundary or by taking action to avoid rerouting. Need-related effects can concern those with mobility handicaps who have little alternative to the car, and people for whom the nature of their journey rules out alternatives to the car. Both are capable of solution through exemptions, subject to the cost of administering and enforcing them.” (Our emphasis).

In a EURoprice Technical Priority Policy Issues Report, the City of Rome’s Mobility Agency (STA, 2000) states that social and political acceptance of road pricing is an issue which plays a central rôle in the feasibility of implementing a road pricing programme. The Agency suggests that the viability of road pricing depends upon the perceived benefits and the justification given for the development of such a programme in the selected area. Nevertheless, STA recognizes that:

“...regardless of how critical those factors may be for the city, a number of particularly difficult aspects generally have to be addressed:

- Social exclusion by creating charges for road use, will certain groups be marginalised?
- Economic vitality - will the road pricing help or hurt the vitality of the selected area?
- Privacy of users - will the privacy of users be sacrificed in the implementation of a road pricing system?”

The Agency states that these issues are generally handled by developing the following types of programmes: awareness raising (how best to inform the public of
what the system entails, what sacrifices would be expected and the overall objective of the programme); and marketing strategies (how can the road charging costs be presented to the public to best highlight the direct benefits that will be accrued based upon the system).

The City of Edinburgh Council (2000) also highlights the importance of consultation and stakeholder influence in the success of a charging policy:

“It is generally recognised that consultation is a key issue on the acceptance of road user charging. Stakeholders have a major influence on the successful delivery and operation of demand management and transportation policies. Involvement in debate helps to raise awareness and it seems that stakeholders who understand the issues are more likely to support road pricing. The views of some major stakeholders may influence the attitude of others to road pricing.” (Our emphasis).

Referring to types of consultation which had been undertaken as part of the EURoPrice project and the effects of the consultation on the opinions and acceptability of road pricing as a policy tool, the quotation from the City of Edinburgh Council (2000) also suggests that there is a relationship between the amount and type of consultation undertaken and the level of awareness and support for road pricing. One of the Council’s conclusions is that cities which have consulted to the greatest extent, named as Bristol, Edinburgh and Trondheim, have received the greatest support for road pricing. It should be noted that this understanding does not fit closely with the suite of precognitions currently in front of the public inquiry into the Edinburgh scheme.

In a report prepared for the DETR on Urban Road User Charging Scheme Design Principles and Policies, Transport & Travel Research (2000) states that there is a dearth of available literature on road user charging and the following issues:

- longer-term impacts (for example, on local economies and on land use patterns)
- public-private partnerships
- public relations and publicity campaigns (when schemes are actually being implemented)
- procedures for reviewing and updating charge levels (after schemes become operational).

In an Institute of Directors (IoD) policy paper entitled “More Roads and Road Pricing - The Way to Go? “, Leach (2001) reports that:

“Congestion on the roads is not a new phenomenon – chariots filled the streets of ancient Rome – but this does not mean that we should accept the status quo. In this paper the IoD argues for the introduction of widespread road pricing together with the construction of extra capacity on the road network.”

Leach states that the IoD argues that the solution to road congestion involves both demand-side (road pricing) and supply-side (new road capacity) elements. Following orthodox Economics arguments he suggests that the road network in the UK desperately needs a pricing system which will reduce congestion, finance investment in new capacity, and internalize the marginal social cost (accidents, road damage, pollution and congestion) of road use to increase economic efficiency. In addition, the author states that the introduction of road pricing should be revenue neutral, offset by reductions in fuel duty.
In terms of the impacts of congestion pricing, Small (1992) states that adoption of the policy would produce many ancillary changes in markets such as those for labour, land and retail goods that would affect the ultimate beneficiaries of the policy. In addition, the author states that improved efficiency of travel would alter many economic activities including trucking, bus transit, deliveries and the businesses that depend on them.

Small states that:

"A congestion pricing program produces four main types of direct effects. Two are negative: (a) the actual fee payments, and (b) the inconvenience to those who change their behaviour in order to avoid the fees. The other two are positive: (c) the benefits to travellers who encounter less congestion, and (d) the benefits from uses of the revenues."

He suggests that the theoretically optimal congestion charge is the one that maximizes the difference between (c) and (b). However, he adds that the people who benefit from congestion relief and revenue uses do not necessarily coincide with those who pay the fees or who suffer inconvenience in order to avoid them. In addition to these 'winners' and 'losers' identified by Small, we need to consider the 'knock-on' effects on other groups (e.g. those who may suffer or gain from the effects of the changes in driver behaviour etc.).

Goodwin (1989) states that it has always been argued that road pricing would increase economic and transport efficiency. He states also that there are many different types of road-user - some vehicles have higher values of time (e.g. business travellers or commercial vehicles) and some have lower values of time (e.g. some categories of commuting and leisure travel). As a result, Goodwin suggests that the traffic still using the road at a higher price can actually get net benefits of speed even before the revenue is spent. In addition, the author states that there are vehicles of different efficiency in their use of road space (e.g. buses compared with cars). This means that the passengers in more efficient vehicles can benefit because the charge is divided among them but the time-saving is enjoyed by all of them.

Goodwin proposes that rules to allocate the revenue and road space should be built into scheme design from the beginning. He suggests that the 'Rule of Three' be used and that the road space which is initially released by road pricing should be used as follows:

- One-third reclaimed for environmental improvement, including pedestrian areas and non-transport uses.
- One-third used for extra traffic, attracted by the speed and not deterred by the cost. It would be appropriate to make arrangements for this to favour high-efficiency and high-occupancy vehicles.
- The remaining one-third for increased speed, especially at congested times, e.g. peak periods, to increase speed by 3-8 km/h. This will require the combination of pricing with other measures to reduce the tendency for traffic growth to offset any achieved speed increase.

With reference to revenue, Goodwin states it should be partitioned as follows:

- One-third considered as general tax revenue, either to reduce existing taxes or to increase social spending in accordance with the priorities of each country or locality.
• One-third used for new road infrastructure and its associated maintenance, in locations again chosen in accordance with the varying national or local priorities.
• One-third used to improve the effectiveness of public transport, by a suitable combination of fare and service-level improvements.

Goodwin further argues that:

“This is an approach in which the freight, public transport, motor and road industries, and the environmental, motorist, computer, pedestrian and public transport lobbies, all have something to gain. And governments have the possibility of a vote winner, instead of a vote loser.”

Schlag (1997) suggests that an important precondition for successfully implementing traffic demand management systems is public and political acceptance. However, the author reports that empirical research in this field such as the EU research-project MIRO (Mobility Impacts, Reactions and Opinions sponsored by the European Commission DG XIII - a collaborative study of public opinion about a range of traffic demand management schemes) has shown that the public acceptance of such measures is low - in spite of the perception of traffic problems as serious. The author suggests the following to make transport pricing more acceptable:

• The objectives of the scheme have to meet main public concerns.
• Transport pricing measures have to be perceived as very effective solutions.
• Revenues must be hypothecated and alternatives have to be provided.
• The full and reliable functioning of the system must be guaranteed from the start.
• Equity needs have to be considered very carefully.
• Public acceptance can only be expected if people have confidence in the measure’s effectiveness, use of the revenue, fairness and anonymity of the system.
• An intelligent marketing strategy.

There are many papers dealing with public acceptability of road user charging and the importance in this of perceived equity (e.g.: Johannson and Mattson, 1995; Langmyhr, 1997; Richardson, and Bae, 1998). For instance, Viegas (2001) argues that political hostility is normally based on people having to pay for what is currently freely available, and on the risk of exclusion for those with little revenue available for the extra charges for driving into the city. Viegas goes on to propose that all local taxpayers receive a direct ‘refund’ of their tax contribution in the form of a certain amount of "mobility rights", which can be used both for private car driving in the tolled areas and for using public transport. Although horizontal equity suggests that such compensation (of road user charges to vehicle users) should only occur after external costs are taken into consideration (Litman, 1996). Also Litman argues that vertical equity suggests that that revenues benefit low-income drivers, as a group, at least as much as the costs they bear, and that disadvantaged residents (including non-drivers) benefit overall.

Levine and Garb (2002) note the distinction between enhancing mobility enhancing and accessibility, each with different potential policies to promote them. They argue that a mobility-based congestion pricing may alleviate congestion but this may threaten a deterioration of overall regional accessibility as it may accelerate metropolitan deconcentration (e.g. through shops, customers, employers etc. moving out of the centre and not being fully replaced by others). In contrast, they argue that
an accessibility-based congestion pricing avoids increased sprawl by incorporating policies to ensure that drivers put off the travelling by the charges are replaced with residents and travellers arriving at the cordon area by other means.

STA, the City of Rome’s mobility agency, (2000) optimistically reports that in Edinburgh “Road user charging options will be carefully examined from the point of view of distribution of costs and benefits for geographic and socio-economic categories.”

STA also states that in any charging scheme developed for Edinburgh:

“There is also a desire to ensure that investment is related to those who pay – ‘geographical equity’.“ Edinburgh, as part of the congestion charging scheme and in recognition of the contribution of adjacent neighbourhoods to congestion charging, proposes to provide finance to neighbouring authorities for improvement of their public transport links into Edinburgh. These links will traverse areas of Edinburgh which are exempt from the congestion charge. Such bus routes will, however, also provide a service to Edinburgh residents exempt from charges unless a non-stop service is provided once the bus crosses the City of Edinburgh boundary. If service improvements are to be made in adjacent authorities through congestion charging revenue, the issue of the legality of recycling funds in neighbouring authorities, raised by West Lothian Council, becomes a factor: can Edinburgh legally provide funds for transport improvements outside its geographical and political boundary?”

STA states further that:

“The pressure for implementation of road user charging (in Edinburgh) therefore comes particularly from the need for revenue generation, but the objectives it will achieve are wider, including congestion reduction, and a better environment particularly in the city centre, as well as raising revenue. It would be used for a package of measures not just one major infrastructure project.”

Whittles (2003), researching road user charging in Edinburgh, has described the scepticism with which some politicians and members of the public view road user charging, particularly concerning its potential wider impacts upon economic efficiency:

“Despite strong support for road pricing from the professional transport planning community, members of the public and politicians remain unconvinced of its potential benefits and wary of the significant changes that road pricing could pre-empt, such as shifts in congestion and environmental problems, alteration in city competitiveness and attractiveness, a revolution in the way drivers pay for road use and electoral consequences for politicians.”

All these concerns have been expressed by our interviewed stakeholders in relation to the proposals for Edinburgh.

3.2 Boundary effects of road user charging: new tools for measurement

Recent research in Bristol (Rajé et al., 2003) indicates that there is a potential in road user charging for the development of boundary problems and displacement effects. In Bristol, there are concerns in the inner city wards to the east of the city centre (with the city’s highest concentration of ethnic minority population and high levels of deprivation) about current parking problems. These areas already experience spill
over parking from the central business district with drivers leaving their cars on local streets and walking or taking the bus into the city centre. If a cordon charge is introduced to enter the city centre, it can be assumed that drivers will search in areas immediately outside of the cordon for parking.

By extension, it can therefore be assumed that the charge’s introduction could result in a two-fold and linked displacement effect - the displacement of cars that would have been parked in the city centre to the immediate outer-cordon neighbourhoods and the consequent displacement of residents’ opportunities to park in their local area to adjacent areas (Rajé, 2003). This displacement effect may also be potentially accompanied by the potential ‘crowding out’ of local inhabitants from the public transport services by commuters now parking in the neighbourhoods immediately outside of the cordon and making the remaining journey by public transport services. It may have significant labour market and social effects, particularly as certain disadvantaged groups and those in part-time or low-income jobs are particularly influenced by travel time and pecuniary costs (McQuaid et al., 2001; McQuaid and Greig, 2001).

3.3 Auditing Tools

A simple auditing tool is readily available to local authorities wishing to monitor and ameliorate such effects: traffic wardens could be used to feed back real-time online information on parking violations resulting from the introduction of the cordon. This is a potential instrument for a local authority to consider in the conducting of an equity audit (Rajé, 2002).

Parking enforcement technologies provide an easy and rapid form of data collection and can be organised so as to reveal area of origin of non-local vehicles (Grieco, 2003). Parking enforcement equipment can be used as a tool for the transmission of licence plate numbers and vehicle locations to the police, assisting them in targeting vehicles that are avoiding paying to enter the city centre by parking in inner city areas immediately outside the cordon (Rajé, 2002). With hypothecation, revenue would be available to offset such exclusionary effects of road user charging to provide intelligent demand responsive transport services for local people crowded off their neighbourhood streets and off public transport services: this would have a strong social equity effect and gives an insight into innovatory reorganisation of transport to meet the social exclusion agenda without any substantial policy shift or incurred expense (Grieco, 2003). Hypothecation would, however, require new legislation.

The harnessing of parking enforcement technology to audit impacts may indeed preclude the need for extensive revision to a central parking zone (CPZ) associated with the introduction of cordon charging. (Further information on changes to Edinburgh’s CPZ can be found at: http://www.edinburgh.gov.uk/traffic/controlledparking/ [May, 2004]).

There may be some benefit in carrying out parking audits at present to see where, in the ‘do nothing/do minimum’ scenario, people who are parked immediately outside the proposed cordon are from. This would enable the local authority to build a picture of the baseline situation and serve as an indicator of the origins of those drivers who are likely to avoid a cordon charge by parking in the peripheral area. Changes in the CPZ may assuage some of the parking problems for local residents but this raises another equity issue: how fair is it for residents who currently park on-street free of charge to have to start paying for a parking permit if the CPZ is extended as a way of managing potential displacement parking effects? It has been suggested that people
on lower incomes are significantly less likely to cross a cordon and be charged (Sinclair, 2002), raising serious equity concerns about people on lower incomes having to pay for on-street parking once congestion charging is introduced: in this way, lower income drivers could almost be seen to be penalized for not crossing the cordon by having to pay for a permit to park outside their home anyway (although it is common for local residents to be given (limited to one vehicle sometimes) free parking near their homes even when other drivers must pay for parking).

In light of the findings in Bristol, Sinclair’s view that ‘as a group, lower income people and socially excluded are likely to be less affected by the proposals for introducing congestion charging’ needs re-examining (Sinclair, 2002). If Sinclair is referring to direct effects the statement may hold true. However, taking a wider view of the social and geographic impacts of charging, there are indications that for those people on lower incomes who live immediately outside of a cordon, displacement effects could, in contrast to Sinclair’s view, be significant, unless provision is made to avoid this (e.g. provision of free parking for residents and ensuring that suitable public transport is available). This highlights the need to examine the indirect impacts of charging on communities such as Craigmillar, Wester Hailes, North Edinburgh and South Edinburgh. If unemployment is taken as a proxy for low income, these locations were identified by Sinclair (2001) as areas with levels of unemployment of between 8 and 13%, against an Edinburgh average of 4.5%, and these areas are also identified through the and the Scottish multiple deprivation indices as areas of multiple disadvantage.

The City of Edinburgh Council recognises the possibility of displacement parking effects (http://www.edinburgh.gov.uk/traffic/NTI/FAQ.html [May, 2004]). However, there is no evidence to suggest that displacement parking audits are being considered in the Edinburgh policy arena in relation to road user charging. Rather than depending largely on drivers’ behavioural change to ameliorate spill over parking effects as the Council implies:

“Care will be taken to deter motorists from parking in areas immediately outside any area boundary and then either travelling by bus or walking into the city centre. Those motorists who do want to park-and-ride will be able to use the formal park-and-ride schemes which will have been established and paid for by the congestion charging money.”


We are suggesting that available technology be harnessed to carry out an audit with measurable outcomes and which has the potential to add to the social exclusion, social equity and road user charging discourse and to viable solutions. Any city, such as Edinburgh, contemplating road user charging, should give consideration to using instruments such as displacement parking audits to identify policies relevant to the equity issues.
Section 4 - Particularities of the Edinburgh case

4.1 The political agenda and policy process: public distrust

A perusal of the types of comments made about congestion charging in the print media indicates that there appears to be some cynicism about the way in which transport policy is presented to the public:

“Although the proposed road tolls are still called congestion charging, the Council has not put the congestion argument at the centre of its campaign. Targets for reducing numbers of vehicles or levels of CO₂ emission have not been prominent in presenting the case for the charge.

What has been at the centre of the Council’s campaign is raising money to pay for public transport improvements, despite the fact the Scottish Executive has already come up with the cash for the first two tramlines and the rail link to the airport. But it is already clear from London’s experience of congestion charging that tolls do not raise as much money as hoped and it costs more to run the system than expected.” (Spaghetti juncture’ @ http://news.scotsman.com/opinion.cfm?id=350332004 [March, 2004]).

This perception extracted from the news media has been confirmed by the precognition statements placed in front of the public inquiry. The public advertisement of the “success” of the Edinburgh consultation process across European Commission web sites, and reported through the STA, clearly provides new ground through which the policy agenda and political process have developed. However, this European development must be set against apparent public distrust.

4.2 ‘The Heart of Midlothian’ - legend and disjuncture

The Heart of Midlothian, a heart-shape set in the cobble-stones of the street, “is a symbol of local pride” (‘What’s the Heart of Lothian and the Royal Mile?’ @ http://www.faqs.org/faqs/music/marillion-faq/part2/section-3.html [April, 2004]) and was the nickname of the old Tolbooth prison just to the west of St. Giles Kirk on the Royal Mile in Edinburgh (‘The Heart of Midlothian’ @ http://www.sfw.org/books/midlothian.html [April, 2004]). The history of physical and psychological connections between Edinburgh and Midlothian are highlighted in the following extract:

“Despite Edinburgh having been very much the centre of Midlothian for hundreds of years, local government boundary changes in 1974 established a separation between Edinburgh and its Midlothian hinterland. The past connection between Edinburgh and Midlothian can also be seen through the old Midlothian County Chambers, located on George IV Bridge, temporarily being used as a visitor centre for the new Scottish Parliament and continue through, for example, the football team, Heart of Midlothian (or simply ‘Hearts’), based at Tynecastle Stadium.

The heart we see today set into the Royal Mile records the position of the 15th Century Tolbooth of Edinburgh, demolished in 1817, which was the administrative centre of the town, prison and one of several sites of public execution. The Tolbooth features in Sir Walter Scott's novel, also called The Heart of Midlothian, published in 1818. The criminal fraternity used to spit on the door of the Tolbooth as they passed...
by, and this tradition persists with many Edinburghers still spitting on the Heart on walking past.” (‘The Heart of Midlothian’ @ http://www.geo.ed.ac.uk/scotgaz/features/featurefirst8035.html [April, 2004])

Within the passage above there is an indicator of the disjunctive impact that local government changes have had on the severance of the rest of Midlothian from the capital city - a disjuncture between local authority administrative boundaries and functional and historic boundaries. While the 1975 local government reorganisation still retained a strategic (in terms of transport, strategic planning, education etc.) authority in the form of Lothian Regional Council, this formal linking of the areas was removed in the mid-1990s when unitary authorities came into being. Also in terms of functional links, most of the former Lothian Region (including West and Mid-Lothian Councils) are part of the Edinburgh Travel-to-Work Area (TTWA) showing the strong labour market links across the whole area (which does not appear to be fully reflected in the Road User Charge boundaries). These factors make the examination of the impacts of congestion charging on Midlothian particularly interesting as a case study – the beginnings of which have been articulated in this report. To provide a context for discussion of congestion charging itself, a brief historical insight into local government in the Lothian region is provided.

In 1975, a major reorganisation of local government in Scotland took place introducing a new system of 9 regional, 53 district and 3 islands councils (‘Local government in Scotland’ @ http://www.edinburgh.gov.uk/CEC/Corporate_Services/Corporate_Communications/How_the_Council_Works/How_the_Council_Works.html [May, 2004]). As a result, until April 1996, when local government was again reorganised, Edinburgh had a two-tier local government structure administered by Edinburgh District Council and Lothian Regional Council. The Regional Council was responsible for long-term transport planning and originally tested various road pricing scenarios for the city. It was several years after local government reorganisation, in 1993, that this work “got to an 'inception' stage” (Whittles, 2003).

STA (2000) provides a summary of the evolution of the justification for a road user charging scheme in Edinburgh:

“In 1990 the then City of Edinburgh District and Lothian Regional Councils and the Scottish Office jointly commissioned the Joint Authorities Transportation and Environmental Study (JATES) report. Development pressures, both in the centre and in the western suburbs, have led to traffic and transport problems which needed to be addressed. The consultants were required to perform three main tasks:

- to conduct a strategic study of transport and the environment in Edinburgh over the period to 2010;
- to develop a more detailed description of the performance of Edinburgh’s road system; and
- to provide a basis for assessing public transport infrastructure investments.

Road pricing emerged as the key policy issue:

“Provided arrangements can be put into place to allow road pricing revenues to be recycled to defray the costs of local transport investment, strategies which include road pricing achieve lower levels of car use and higher speeds, improve accessibility and environmental quality, reduce fuel consumption and casualties and stimulate greater economic activity.”
The study concluded that the main policy options were the level of new infrastructure provision, the extent of environmental traffic management in the centre of Edinburgh, the level of fares and the question of whether road pricing should be introduced.

To help decide the then Lothian Regional Council commissioned further work and an Inception Report was published in 1992. It tested the potential effects of a series of alternative schemes for implementing road pricing in Edinburgh in terms of:

- overall costs and economic benefits;
- travel choices;
- transport network performances;
- urban economy impacts;
- social & equity impacts;
- technology;
- administration; &
- public acceptability.

It was concluded that the charge which achieves maximum benefit is far lower than that which maximises revenue. Small charge increases above the economic optimum can achieve an increase in revenue with little loss of benefit. Beyond this benefits are reduced rapidly at higher levels of charging. Recent modelling work undertaken during 1999/2000 has confirmed that road user charging does provide overall economic benefits.”

With local government reorganisation in April 1996, Lothian Regional Council ceased to exist and four new, smaller single tier authorities took responsibility for local governance, Edinburgh, West Lothian, East Lothian and Midlothian Councils.

It appears that as scale and responsibility has changed, there has been an attendant reduction of local service determination. The redistribution of political authority through local government reorganisation in 1996 may arguably have brought some governance back to more local areas, as Midwinter (1995, quoted in ‘Local government – subject profile’ @ http://216.239.59.104/search?q=cache:cc3y6ZpnynAJ:www.scottish.parliament.uk/re
cSearch/briefings-03/sb03-49.pdf+impact+local+government+reorganisation&hl=en&ie=UTF-8 [May, 2004]) implies was one of the objectives of reorganisation. However, the consequence for wide-scale strategic transport planning is that impacted community voices from outside the council boundary may become lost because they are not within the jurisdiction of the planning authority that is making the decisions that affect their community. This has potential for inequity effects. It should also be noted that other forms of co-ordination and co-operation, across specific geographic areas and different agencies, have been developed, including Community Planning, created through the Local Government Scotland Act 2003:

“Community planning is a process by which a local authority works in partnership with other public bodies and the local community to plan and provide services in a local authority area. There is no single model for community planning with practice varying between council areas. The overall aim is to improve how public services are delivered and to help achieve better public services that more closely reflect communities’ needs.”

(‘Local government – subject profile’ @
While addressing local problems is a welcome step, there are concerns that this type of planning approach may not be entirely suitable for strategic transport planning. Transport and travel by their very nature are not governed by boundaries and involve movement of goods and people over spaces that are beyond the local community or area: transport provides the links between different areas. Given that there is potential for detrimental effects of transport schemes even within a single local authority’s area of governance, as was found in research in Bristol and Nottingham where spillover parking effects from the central business area could have impacts on neighbourhoods immediately outside a congestion charging cordon (Rajé, 2003), there may be even greater potential for such impacts in areas that are immediately outside of an authority’s jurisdiction, for example, in Midlothian in respect of the Edinburgh scheme.

4.3 Exemption conflicts: the case of taxis

Comments by bus operators, such as First, suggest that they view the exemption of taxis from the congestion charge as unfair:

“There has been a general acceptance in recent years that taxis should be permitted to use bus lanes and other bus facilities as they offer a public service and rarely (to date) have bus lanes operated at capacity. There may, therefore, be pressure to exempt taxis from road charging schemes on the basis that they constitute public transport. However, we believe that this would be flawed and would result in a significant dilution of the benefits of road charging in terms of congestion reduction. Effects would include: Transfer from car to taxi use across cordons – this would not result in any congestion relief with a simple switch from one vehicle to another. Indeed additional dead mileage of taxis may actually increase vehicle mileage on such transferred trips.”

(‘Responses to Road User Charging Consultation On Exemption Regulations Under Section 54 of the Transport (Scotland) Act 2001′ @ http://www.scotland.gov.uk/library5/transport/ruchr-00.asp [May, 2004]).

However, taxis are also exempt from the charge in London. There is a history of a strong lobby by taxis in the Edinburgh area. For example, when the first phase of the City Centre Transport Proposals were being developed in the mid-1990s, it was initially proposed that taxis would be banned from using the east bound side of Princes Street when traffic other than buses was banned from using the route. However, strong opposition to the plans was voiced, largely by the taxi associations, and a decision was made to allow taxis to use the bus and cycle only route. The often-cited view that taxis are providing a service when public transport cannot is often used to strengthen the arguments for taxis being given the same access as public transport vehicles in schemes that restrict movement of other vehicles.

4.4 Municipal bus operator – fit with proposed policy

The municipal nature of ownership of local transport services may strengthen the ability of the local authority to adjust services positively in response to congestion charging. In addition, the growth in 'ridacard' use indicates that the Edinburgh public is already willing to use public transport which may indicate a greater propensity to
modal shift from car to bus if charging renders car-based trip-making unfeasible economically or operationally for individuals.

“Since 1871, Lothian Buses plc and its predecessors have been the principal public transport provider in Edinburgh... and currently hold an 80% market share in Edinburgh and its immediate commuter catchment area in Midlothian and East Lothian. Lothian's buses carry some 250,000 passengers each day via an extensive network of over 50 high frequency bus services. The company employs 1,700 staff, runs over 500 vehicles and has an annual turnover of around £60 million. Lothian Buses is now one of only seventeen bus companies in Britain, and the only bus company in Scotland, still in municipal ownership, with the City of Edinburgh Council and neighbouring Authorities in the Lothians being the shareholders. The company is renowned for its very strong customer service ethos and places customer satisfaction above profit margins.”

('Case study – Lothian Buses’ @ http://www.wayfarer.co.uk/news/casestudies/lothian.htm [May, 2004])

Rye and Wilson (2002) provide an overview of the structure of bus service provision in Edinburgh:

“Due to its generally poor urban road infrastructure, limited city centre parking, outlying social housing schemes and its high density core and inner suburbs, bus ridership in Edinburgh remains at about 200 trips per person per year, the highest in the UK outside London, making it a very strong bus market. Within the City of Edinburgh fully 97% of bus services are commercial, although many of the longer distance services into the city require subsidy.

The dominant bus operator in Edinburgh is Lothian Buses, with 550 vehicles running 19.5 million vehicle miles of service annually and carrying annual ridership of 91.5 million passengers. The direct descendant of the municipal tram company, it is one of the few UK bus operators that has not been privatised: it remains owned by four local authorities in the region, but it must operate as a public limited company without any direct control or subsidy from government. However, its owners are willing to accept a lower profit on turnover – about 12% - than they would if it were owned by one of the major bus groups. It can be argued that this allows Lothian to cross-subsidise services and to set lower fares more than it would be able to if it were a stock market listed bus company required to return about 15% on turnover (see White (2000)).

Edinburgh’s other major bus operator is First Edinburgh (formerly SMT), a unit of First Group, running approximately 260 vehicles in the area. Since deregulation, First/SMT and Lothian have had periodic bouts of on-road competition, such as in 1994, for example, when SMT registered several services that had “traditionally” been run by Lothian. Generally, though, on-road competition has been limited to one or two routes, and the two operators have generally operated in geographically distinct areas: Lothian in the city and SMT/First to the outlying towns.

Between 1997 and 1998 the City of Edinburgh Council made a major contribution to the quality of bus services by investing about £7 million in bus priority routes on two key western routes and one north-south route in the City. This has been followed by subsequent investment in bus priority on a lesser scale in the east of the City, and more bus priority is planned in the southeast corridor. The City's vision of the Quality Partnership was realised through the development of Greenways - as these bus priority routes were called - and they resulted in a rise in patronage on Lothian Buses services using these routes (TAS Partnership, 2001). “Nonetheless, the local authority still does not have any direct control over changes in bus networks,
frequencies or fares. These types of changes remain under the operators' control.” (Rye and Wilson, 2002 @ http://216.239.59.104/search?q=cache:QhbAyP0aj0J:www.tri.napier.ac.uk/urban%2520bus%2520situation%2520in%2520UK%2520rye%2520wilson%25202002.PDF+municipal+bus+benefits+uk&hl=en&ie=UTF-8 [April, 2004])

4.5 The Forth Road Bridge: a history of paying to enter the city of Edinburgh

Mr. Dalyell: Before anyone says anything more about road tolls, will they come to my constituency between 7 am and 9 am and between 4 pm and 6 pm to see tolls in operation on the Forth road bridge? These are, in effect, tolls for entering the city of Edinburgh, and congestion is caused to the extent that people are talking about a second bridge, although that is completely unnecessary. If these tolls--for a bridge that has been paid for--were done away with, congestion would be much alleviated.

Mr. Norris: The congestion is not caused by the tolls, but by the fact that people have to stop before they cross the Forth road bridge and pay the toll at a toll gate. Modern tolling systems abolish the need for toll gates, as the tolling is done automatically by reference to a smart card in the vehicle. Such a system is up and running and available to regular motorists in Dartford. One of the propositions at the forefront of the technology trials on tolling systems generally has been the idea that we could not possibly afford to introduce toll booths on every access road to every city. It would be wholly impractical. The proposition that the hon. Gentleman quite understandably puts forward is not at odds with the concept of tolling; it illustrates vividly and graphically that there should not be physical toll booths at which vehicles have to stop. That is the way in which technology is moving and it will not be many years before it is taken for granted (http://www.parliament.the-stationery-office.co.uk/pa/cm199596/cmhansrd/vo960610/debtext/60610-02.htm [May, 2004]).

As these extracts from Hansard demonstrate, the toll on the Forth Road Bridge has already been the subject of equity discussions. The Sunday Herald (‘Calls for all bridge tolls to be scrapped in line with Skye plans’ @ http://www.sundayherald.com/38840 [May, 2004]) reported in December 2003 that Labour members of the Scottish Parliament were calling for charges on all toll bridges to be scraped in line with plans for removing charges for the Kyle of Lochalsh crossing:

“They argue that, if the Liberal Democrats could secure an end to the tolls required for the privately owned bridge at Kyle of Lochalsh, then the same should apply at least across the Clyde and possibly also on the Firth crossings on the east coast.”

However, despite the call for tolls to be removed, it appears more likely that the charge to cross the Firth of Forth by car will increase later this year:

“The cost of crossing Scotland's biggest Toll Bridge looks set to rise by a massive 25%. Car users presently paying 80p to cross the Forth Road Bridge will fork out a pound from October because of increased maintenance costs.” (http://scotlandtoday.scottishtv.co.uk/content/default.asp?page=s1_1_1&newsid=2993&newsType [May, 2004]).

If this goes ahead, it is likely to create even more resentment amongst the motoring public and, in particular, those who travel from Fife and beyond into Edinburgh, given the apparent lack of understanding of why a toll is in place as expressed by the RAC in Scotland:
“We don’t understand why there are tolls there anyway. As far as we are concerned, this is a bit of road.” (‘25% rise in tolls on Forth Road Bridge’ @ http://news.scotsman.com/topics.cfm?tid=654&id=264692004 [April, 2004])

With this background, the discussions of congestion charging in Edinburgh and exemptions of residents of suburban Edinburgh will add to the feeling that certain sections of the population of southeast Scotland are being faced with penalties for driving that others do not face. The issue of equity arises from the spatial distribution of the charges rather than the principle of charging in itself. One commentator has implied that the distribution of exemptions contributes to the feelings of inequity and antipathy towards the charging scheme:

“The way the road tolls proposals have been handled by the council right from the start does nothing to inspire confidence or support. And the way exemptions are now being dished out just adds to the resentment of ordinary motorists and provides further evidence of the confused thinking behind the proposals.” (‘Spaghetti junction’ @ http://news.scotsman.com/opinion.cfm?id=350332004 [March, 2004])

4.6 Edinburgh’s proposed pattern of exemptions

It is interesting that the residents of areas such as Balerno and Juniper Green will be exempt from the charge, so can continue to travel into central Edinburgh without penalty by car traversing areas such as Slateford, Dalry and Gorgie which are made up of dense tenement-type housing and more deprived households. It seems inequitable to allow traffic from the more well-off suburbs to continue to travel free of charge through more congested communities, if one of the objectives of congestion charging is to lessen traffic impacts on all residents of Edinburgh. As a corollary, if higher income residents of areas along the A70 corridor do not have to pay the charge, it can also be assumed that they may continue to drive to areas such as Gorgie and Dalry and then park on street, taking the bus into town from here to avoid having to pay for parking in the City centre.

Thus local residents in multiple occupancy apartment buildings, who have difficulty parking on-street in any case, may find that their task of finding a parking space is made even more difficult by non-residents parking in their streets. Tenements in these areas within 10 minutes bus journey of the centre are often largely made up of 1-bedroom flats where single people, elderly couples and single parents may live. Displacing someone who needs her car (which is often old and expensive to run) to travel to work on shifts and take their child to nursery care or to visit and care for elderly relatives is one example of how unavailability of parking caused by people from outside of a neighbourhood can have adverse and inequitable impacts, unless careful schemes for resident parking are in place.

4.7 Social exclusion in Edinburgh – the geographical context

The primacy of social exclusion issues in relation to transport within Edinburgh is documented in a number of reports:

“Access to low cost nutritional foods is becoming more difficult for low-income families with the siting of major retail facilities away from the most socio-economically disadvantaged areas, leaving very limited local shopping choices. Information from the food retail industry suggested that shops located in the most socio-economically...
disadvantaged areas are facing competition from large retail parks, and in Edinburgh are increasingly vulnerable to vandalism and crime.”

(‘Chapter six - Divided City - neighbourhoods and social exclusion’ @ http://www.onecity.org.uk/Publications/Chapter%206.asp [May, 2004])

Further, “Not all the shops, services and employment which people need are where they live. We heard frequently that there are difficulties of access for people in some areas because of the routing and availability of public transport. The threat of out of town shopping to local facilities has been identified as a significant issue. However, we heard that it also promotes inequality in access to services and facilities:

“This kind of development is slowly eroding local shopping centres. You enter a vicious circle whereby local people with mobility difficulties who have had to rely on local services because they cannot get to South Gyle, are finding that their local services are disappearing.”

Similarly, the problems of access to hospitals were raised as a specific problem. New out of town sites require longer journeys and often changing services, instead of a simple journey to a central location:

“...both the location of the Royal Infirmary and the catchment chosen for St John’s Hospital causes all sorts of difficulties by large parts of the catchment area falling within the City of Edinburgh not being accessible to the hospital by public transport and this leads to the inevitable demand for supported services. This does not seem to be a factor in health trust thinking when hospital locations and catchment boundaries are drawn up. For our interest as transport providers the optimum relocation for the Royal Infirmary would have been redevelopment of the existing site as it is at the hub of transport services. This problem is not confined to provision of health services. On a smaller scale, for example, we have heard that the provision of the Children and Families Service by the Social Work Department for Wester Hailes has been transferred to Oxgangs because of lack of office space in Wester Hailes. This has resulted in service users having to travel outwith the local community to use a service that was previously available on their doorstep.

We have already referred to the problems that poor transport provision causes (particularly in the evenings and at weekends) for people living away from the core network. We also heard that some parts of neighbourhoods were no longer served by public transport at all, such as the Calders in west Edinburgh. As a result people have a long way to walk from their home to the nearest bus stop. For people with mobility problems this presents a significant problem of exclusion.

We were told that one of the greatest challenges in coming years is ensuring the broad availability of public transport. This applies equally in deprived areas which have experienced population loss and those which become more prosperous. The need to make new developments accessible through the public transport network has also been identified as a priority. This applies just as much to communities which are distant from areas of opportunity as to communities that are adjacent to such areas.”

(‘Chapter six - Divided City - neighbourhoods and social exclusion’ @ http://www.onecity.org.uk/Publications/Chapter%206.asp [May, 2004])

Identifying the charting of the cordon against known areas of social exclusion and transport deprivation is a necessary component of an equitable congestion charging scheme. There is no current evidence to suggest that this exercise or any similar form of mapping has been undertaken.
Section 5 - Policy recommendations

5.1 Fine tuning of congestion charging

The public awareness and public acceptability of road user charging is undoubtedly important in the re-organisation of an effective transport system. The research carried out in Edinburgh indicates strongly that it is important to examine a number of social and equity issues when developing congestion charging schemes. New approaches must be developed and old issues must be adequately addressed to heighten the likelihood of public acceptability of charging schemes. Inside of this policy space, the importance of compensatory revenue sharing arrangements around road user charging and emerge as a useful new direction (Rajé et al., 2004). The specific form of the road user charging scheme (and its revenue use), the composition of the flow of people across a boundary, and of those living around the boundary, will have consequences for the shape of winners and losers. Hence, the discussion of equity must be contextualised so as to take such issues fully into account. This section highlights the need for taking account of the local context and the utilization of compensatory revenue based schemes for adversely impacted communities when developing congestion charging schemes.

Important issues identified in this study include the development of boundary problems and displacement effects. Areas along the outside of the cordon may experience significant spill over parking from the central business district with drivers leaving their cars on local streets and walking or taking the bus into the city centre or cordon area. The introduction of the road user charge could result in a linked two-fold displacement effect - the displacement of cars that would have been parked in the city centre to the immediate outer-cordon neighbourhoods and the consequent displacement of residents’ opportunities to park in their local area to adjacent areas (Rajé, 2003). Second, this displacement effect may also be potentially accompanied by the ‘crowding out’ of local inhabitants from the public transport services by commuters now parking in the neighbourhoods immediately outside of the cordon and making the remaining journey by public transport services. This may have significant labour market and social effects, particularly as certain disadvantaged groups and those in part-time or low-income jobs are particularly influenced by travel time and pecuniary costs (McQuaid et al., 2001). Further theoretical and empirical research is needed to analyse the boundary effects of road pricing schemes. This may cover national congestion schemes (where there will still be boundary effects, at least for congested parts of the day) as well as local schemes.

Policies therefore must consider resident parking and the level and quality of public transport carefully. Discussions of remedying social exclusion in transport provision very rapidly hit the barrier of finance: where are the resources for funding improvements to come from in a public service structure where ownership has already been highly fragmented and privatized? New demand management measures, such as road user charging, can provide new resources within the public sector for use in the improvement of public transport services and the wider public transport environment. A range of tools for remedying adverse impacts of road user charging can be considered. Some of these tools are discussed in the following sub-sections.
5.1.1 Hypothecation

Hypothecation has arisen as a solution in a context where it has been recognized that one of the major obstacles to implementation of an effective system of transport pricing is community resistance to charges for use of transport infrastructure when there is an expectation and history of free use.

In relation to road user charging, the UK Government has given a guarantee of revenue hypothecation that means that monies raised from congestion charging will be ear-marked for reinvestment in local transport initiatives. In light of the Oxford University research (see Rajé et al., 2004) a key facilitator of social equity would be to improve good modal alternatives to the private car with hypothecated revenue being invested in making the public transport system less onerous to use. However, while investment in public transport will assist with equity, there must be an acceptance that for certain journeys and groups of people, car-based travel is the only alternative. For example, revenue could also be used to improve and pay for taxi journeys for those who cannot afford a car but need individual transport for medical, lifecycle or disability reasons. Demand responsive transport could assist in providing a solution to this problem (see below).

5.1.2 Equity Audits

In order to ensure that the needs people have identified in this study are explored and amelioration of their difficulties prioritised, a tool such as an equity audit (Grieco, 2002) could be employed for all road user charging schemes. This would be a checklist for local authorities, facilitating a survey of gender, ethnicity, spatial, income and other relevant issues related to congestion charging. It would not be a 'one-off' task at the scheme conception stage but a continuous process that would allow iteration through a number of rounds over a scheme's life (Rajé, 2003). In this way, not only would baseline issues be obtained but progress towards equity would also be measurable with any adjustments needed to suppress rising inequities being captured expeditiously.

5.1.3 Exemptions and concessions

It is recognized that the principle aim of congestion charging is to reduce the number of cars using the roads. Nevertheless, in London for example, not all drivers have to pay the central London congestion charge. Within the London scheme there is recognition that for certain categories of drivers and certain categories of vehicles and individual a range of exemptions and discounts may be appropriate, for example, there is a 90% discount for those living in the charged area. It is important in any charging scheme to take account of the need for exemptions and ensure that these are founded on equity considerations.

Approaches that give due regard to potential for inequity display social sensitivity: for some people such as medical and other essential workers who need to be readily mobile to carry out their employment responsibilities, exemptions should be considered. Other groups such as women and shift-workers (whose shift covers part of the charging times) may rely on a private car because of personal security, family responsibility or public transport unavailability reasons. They may not be able to alter their travel arrangements and trip patterns in response to road user charging and yet may fall into the low income categories who are already experiencing inequity in transport. For these people, exemptions may contribute to a fairer experience of transport. However, any exemption scheme cannot be too large if congestion reduction is to be achieved, and it must be fair and opportunities for abuse minimised.
5.1.4 Reorganization of public transport

Hypothecation allows deployment of revenue to resolve existing transport inequity. Revenues should not simply be used to buy more vehicles or upgrade existing infrastructure on the current patterning of provision but should be to adjust the pattern of transport provision to meet the needs of poorly serviced communities. In research in Bristol and in Nottingham (Rajé, 2003), for example, respondents indicated that the present radial form of servicing had many deficiencies as a public service. It is likely that residents of areas such as Midlothian may have similar difficulties. In this regard, a major area that should be addressed is the reorganization of public transport services to allow journeys to be made that reflect community connections such as those that are found within low income communities geographically separated by slum clearance and housing redevelopment.

It should also be noted that the problems associated with having to take one radial service into town to transfer to another to travel between adjacent communities may be exacerbated after introduction of cordon charging with the displacement effect of forcing local people off buses which are filled earlier in the route by commuters parking in the neighbourhood. This emphasizes the need for road user charging and revenue to be invested in providing local, circumferential services that trace the social and other ties that exist in local communities as well as for increasing services on main arterial routes.

5.1.5 Demand responsive transport for essential journeys

Part of the reorganization of public transport under congestion charging regimes should be located in the development of demand responsive transport services. Furthermore, for the elderly, infirm and disabled or socially vulnerable or physically isolated, such as ethnic minorities or women, there must be flexibility in demand responsive services to enable journeys to be made easily. Without this flexibility in demand responsive services at present, characterized by aspects such as very short periods in which bookings can be made, the need to book two days in advance and the limitation to travel only during day time, potential users have to forego trips or use alternative resources such as relatives and friends for lifts or pay for taxis. Hypothecated revenue applied to improvements in such services to make them truly demand responsive, perhaps through investment in online scheduling and booking software and provision of taxi vouchers/services to supplement existing mini-bus based service, would contribute towards social equity and have an additional benefit of decreasing the number of private car trips that are being used as substitutes when demand responsive transport failure is experienced. There may also be scope for ‘pooling’ different types of existing publicly funded transport provision (such as some social services and some patient transport services) with demand responsive services to make them more effective and efficient (McQuaid et al., 2003b).

Apart from wage earners and salaried employees, the issue of volunteer workers in the charity sector requires attention: in many health authorities, volunteer drivers are an important source of health related transport and it is important that they have the necessary exemption from, or are fully compensated for, congestion charging especially as they are a source of demand responsive transport.

As Edinburgh considers the introduction of a tram system as part of its integrated transport package, alongside congestion charging, it may be instructive to turn our attention briefly to the findings of research on the proposed work place parking levy scheme for Nottingham. Within the proposed scheme, the issue of providing demand responsive transport routes or feeder routes to the tramline and tram stops was a subject for further attention. For some participants in that study, the idea of using the tram was attractive but there were concerns about their ability to access the service
either because it would be distant from their home or because they were elderly or disabled and therefore not able to get to a stop. The use of hypothecated work place parking levy revenues in Nottingham (or road user charging revenue in Edinburgh) for the provision of feeder mini-bus services to take passengers to tram boarding points would allow this group of people to use the new service. By making such a service demand responsive, an even greater contribution towards transport equity would be made.

5.1.6 Enforcement of parking restriction
Developing parking displacement audits which would identify vehicles parking in neighbourhoods adjacent to the congestion charging cordon, when operational, may be a useful tool for fine tuning a road user charging scheme. Vehicles attempting to ‘escape’ charges arising from demand management policies, such as congestion charging, can significantly disrupt the social and economic life of adjacent communities outside of the demand management zone (Rajé et al., 2004). The development of appropriate parking policies to protect such vulnerable neighbourhoods as part of the congestion charging strategy requires careful consideration.

Violation of parking restrictions in the adjacent neighbourhoods are, under normal circumstances, less likely to be policed and enforced. Enforcement of parking violations would be necessary to achieving equity and public acceptability of road user charging measures in the neighbourhoods adjacent to demand management schemes. Parking technology could be harnessed in identifying the level of infringement and in determining the part allocation of revenues earned from road user charging to compensate the adversely affected neighbourhoods. Parking fines could also be directly harnessed to develop and provide demand responsive transport or improvements in fixed route public transport for such areas. This practice of compensatory revenue sharing as an equity tool does not appear to have previously been considered within the framework of demand management either in respect of road user charging or in respect of work place parking levy.

5.1.7 Need for simplicity and clarity of scheme operation
Mechanisms put in place for payment must be simple and easy for people to use. Anecdotal evidence from London residents suggests that even after over a year’s operation, some local residents do not know how to pay the congestion charge - even some of those who regularly use the internet and mobile phones. The Edinburgh Chamber of Commerce has underlined the importance of clear and simple ways of paying:

“It is vital that the scheme is user friendly – not just for the regular commuter who will be able to make routine arrangements to pay – but also the daily, casual visitor whether for business, leisure or retail. How will they pay? Will it be clear that they do not have to pay twice if they cross both cordons? Could payment be made using the mobile telephone technology that enables car parking charges to be paid?”

(“Congestion charging – key findings of membership survey @ http://www.ecce.org/downloads/memberdownloads/iss3p9.pdf [March, 2004]).

5.2 Investigation of other options including pedestrianisation associated with improved public transport
It is important to highlight that any improvement made to public transport should be made with full regard to wider spatial effects. Rye and Wilson (2002) provide a useful example of how refinements to bus service provision post-deregulation resulted in
operational gains for passengers on main corridors but left residents of more dispersed rural towns with greater access difficulties because of reduced service provision in through their areas:

“network rationalisation/simplification together with the concentration of services on key corridors at high frequencies – 6 buses per hour or more – provide a ‘turn up and go’ service. At the same time operators have begun to invest more aggressively in new buses, better information and route or network branding. These approaches have been credited with finally reversing long term trends of declining patronage in Edinburgh, Glasgow and Aberdeen, for example. However, it has also led to certain bus users, particularly in outlying areas, losing their ‘commercial’ service, and left local authorities to fill the gaps. They are increasingly unable to do this due to rising tender prices on the one hand and falling revenue budgets on the other (ATCO, 2001). In 2000 for example, in Midlothian, an area of small towns with a total population of about 70,000 south of Edinburgh, one of the two main operators withdrew almost all their lower frequency services and left only one high frequency route. Since the strategy of route rationalisation and simplification appears to work commercially, however, it seems likely that operators will continue to pursue it.”

(Rye and Wilson, 2002 @ http://216.239.59.104/search?q=cache:QhbA-yP0aj0J:www.tri.napier.ac.uk/urban%2520bus%2520situation%2520in%2520UK%2520rye%2520wilson%25202002.PDF+municipal+bus+benefits+uk&hl=en&ie=UTF-8 [May, 2004]).

The search for alternative solutions to congestion needs to take account of ‘soft’ measures such as the use of information and persuasion, as well as bans and regulations ranging from restricted access to privileged exemptions (Goodwin, 2003).

5.3 Importance of public acceptability

In developing public acceptability, it is important that external advertisement of the success of any consultation process be matched by local involvement, acceptance and endorsement of the policy agenda and consultation process. In the case of Edinburgh, there appears to be a gap between the perceptions of the technical developers of the scheme and the affected public, which is underreported in some European policy documents.

5.4 Need for consistency around transparency of policy discourse

The research revealed that some residents felt that they had not been sufficiently involved in the process of scheme development and that consultation had, at times, been rather perfunctory:

“We had a response from TIE (Transport Initiative Edinburgh) (27/11/03) to our comments on the congestion charging scheme which was too superficial. Decided to express our dissatisfaction.”

Minutes of Pilrig Residents’ Association Committee Meeting (14 Jan 2004) (http://homepages.tesco.net/~pilrigRA/PRAcontacts/14%20Jan%202004.htm [April, 2004]).

As important as consultation is, in the era of readily accessible information (for many of not all) on the internet, it is equally important that every attempt should be made to ensure that public concerns that policy decisions do not take account of their views do not have reason to be perpetuated. A recent newsletter (No. 17 January 2004) of
POLIS\textsuperscript{8} contained the following information which implies that the congestion charging scheme in Edinburgh is indeed already a programmed scheme:

"Edinburgh moves towards congestion charging system
Transport Initiative Edinburgh (tie) has issued a call for tenders for a contract to supply the congestion charging system. Tie was created by the City Council to deliver major transport projects in the city. It has been given the responsibility to implement the future congestion charging scheme. The future scheme will have a toll collection system similar to the one currently used in London relying on video-based automatic number plate recognition (ANPR) technology. The system will possibly also include a means of automatic payment based upon tags and beacons. The congestion charging scheme is expected to start operating in 2006. Drivers will have to pay a £2 charge. More information: http://www.edinburgh.gov.uk/"
(Source: ‘Edinburgh moves towards congestion charging scheme @ http://www.polis-online.org/NewsletterPolis/newsletter17_1.pdf [March, 2004]).

Using wording such as ‘to implement the future congestion charging scheme’ and the issuing of a call for tenders suggests that there is some momentum driving the scheme towards implementation when the proposal is actually currently the subject of a Public Inquiry. In an already sensitive public arena, the unintended message of the information in the above extract could be that the authorities are going to proceed regardless of the outcome of any representation made by the public or any other consultation participants. This has great potential to affect public acceptability, as Mackie (‘The political economy of road user charging’ @ http://iei.uv.es/roadpricing/ponencias/mackie.pdf [March, 2004]) reminds us when he states that:

"Whereas in the 1950s and 1960s professional advice was the dominant influence on policy making, social attitudes are now crucial. This reflects a better educated, less deferential society which needs to be convinced by politicians and professionals, not merely told."

To Mackie’s review of reasons that policy making must be inclusive, we can add that people are now better informed both through the media and electronic sources such as the internet. Happening upon an advertisement of an internal vacancy at the Scottish Executive in 2002 (‘Storm over road tolls job advert @ http://news.bbc.co.uk/1/hi/scotland/2153927.stm [March, 2004]) for someone ‘to help implement’ the road user charging scheme also gives the reader the impression that they are perhaps not being given a clear picture of the authorities’ intentions.

It is equally important that the Council shows a sensitivity towards its public when it conveys messages about planned works: the comments expressed about roadworks and associated congestion over the period prior to a referendum on congestion charging (see ‘There may be trouble ahead…’ @ http://news.scotsman.com/features.cfm?id=430382004 [April, 2004]) appear to undermine the credibility of arguments or justifications for charging that the authority puts forward. Prior to congestion charging being introduced in London there were rumours that traffic signal timings had been altered to induce greater congestion effects in order to make the consequent impact of the new charge appear more successful: a cynical part of public in Edinburgh might consider that a rash of road works on key network links may exacerbate the apparent congestion in the city as

\textsuperscript{8} The primary objective of Polis is to support European cities and regions in improving quality of life through innovative measures for reducing congestion, enhancing safety, lowering polluting emissions, and offering better and equal access to transport services.
people consider how to vote in a referendum on a scheme to reduce such congestion. However, perception is important to public acceptability, so it is important that the City Council is seen to be even handed.

5.5 Conclusions

There are many equity and efficiency issues that need to be dealt with in the current discussions on road pricing in Edinburgh. This report has set out the views of many of the key stakeholders. There are strong arguments for traffic demand management, including possibly road user pricing, but it is important that issue of equity are explicitly resolved at an early stage in the consultation and decision making processes. Effective strategies to overcome the boundary problems and ensure adequate parking and suitable public transport provision for communities along the cordon and disadvantages groups are essential.
References


DETR (Department of Environment, Transport and the Regions) (December 1998) Breaking the Logjam, consultation paper on fighting traffic congestion and pollution through road user and workplace parking charges. DETR, London.


### Appendix 1

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<thead>
<tr>
<th>Interests</th>
<th>Within boundary</th>
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<td></td>
<td>Inefficient</td>
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<td>Business Sector</td>
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<tr>
<td>Large Business</td>
<td>&quot;The council’s own figures show that congestion charging would have a negative impact on trade in the city centre. Until there are improvements to public transport and better signposting of car parks within the city, the council should not be pressing ahead with congestion charging.&quot; Harvey Nichols’ general Edinburgh manager Gordon Drummond (<a href="http://news.scotsman.com/topics.cfm?tid=477&amp;id=254402004">http://news.scotsman.com/topics.cfm?tid=477&amp;id=254402004</a>)</td>
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<td>&quot;If congestion charging is to be introduced in Scotland’s cities there must be extensive and effective consultations with all sectors of the business community to ensure the system of charging is fair and equitable but also encourage business to implement improvements to their own transportation policies that help in the drive to reduce congestion. Congestion Charging might not be the only way of improving the flow of traffic in the cities but the initial results in London show that it is having a beneficial impact. If any schemes are introduced they must be cost effective to set up and run, be seen to reduce congestion but must not have a negative effect on the operational efficiency or profitability of the business community as a whole, but especially that of the construction industry&quot;. Sid Patten, Chief Executive Scottish Building (<a href="http://www.scottish-building.co.uk/LatestNews/Congestion%20Charging%20Must%20Be%20Fair.htm">http://www.scottish-building.co.uk/LatestNews/Congestion%20Charging%20Must%20Be%20Fair.htm</a>)</td>
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<td>&quot;It will need to deliver reduced traffic volumes, a much improved public transport system and allow industry to operate more efficiently, however a major prerequisite is that the system be fair and equitable, focusing primarily on those who continue to choose to use their own private transport when there are suitable public transport alternatives available.&quot;</td>
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"The question as to whether the congestion charge (in London) has had an impact on retailers is now beyond dispute and cannot be dismissed. The congestion charge is hitting the retail and leisure sector, and hitting us hard. (Cities like Edinburgh which are planning charging schemes should) look at the potential impact on their economic vitality. In Edinburgh..."
there will be clear and visible economic consequences.” Sir Stuart Hampson, chairman of the John Lewis Partnership (http://news.scotsman.com/topics.cfm?tid=477&id=452452004)

‘SFDF (Scottish Food and Drink Federation) urged the Scottish Executive to extend the exemptions criteria to include all delivery vehicles from charges and urged the Executive to instigate an impact assessment of charging schemes on manufacturers and the food and drink sector in particular, before any such schemes are implemented. Whilst fully supportive of the Executive’s commitment to reducing congestion, SFDF argued steps should be taken to ensure that any charging schemes implemented do not merely act to damage the competitiveness of business in Scotland.’ Scottish Food and Drink Federation (http://www.sfdf.org.uk/sfdf/sfdf_digest.aspx?item=56)

"The crux of the issue for me is that congestion charging should (http://www.scottish-building.co.uk/LatestNews/Congestion%20Charging%20Must%20Be%20Fair.htm)

"Many people are supportive of the concept of congestion charging, but with the important caveat that the devil is in the detail. Some people within the industry have expressed concerns, but my own view is that something needs to be done to tackle congestion." Richard Jeffrey, managing director of Edinburgh Airport and head of Edinburgh Tourism Action Group (http://news.scotsman.com/topics.cfm?tid=477&id=390612004)

"There will have to be public transport improvements for our staff as the system is not good enough at the moment, but provided the predictions for cutting congestion turn out to be true, we’re very much in favour of the idea." Edinburgh Zoo’s chief executive, David Windmill ((http://news.scotsman.com/topics.cfm?tid=477&id=390612004)
| be about raising revenue for public transport improvements. The amount raised in London for that purpose has been a dismal failure. A lot of people in the industry do not believe congestion in Edinburgh is that bad and are against the idea of introducing the tolls as they believe it will have a direct impact on their business. There is a fear that the tolls will act as a deterrent to people coming here if they either have a private car or a hire car. Around 40 per cent of visitors to Edinburgh come by car. Edinburgh is already perceived to be anti-car and people are worried this may further put people off or that people who are hit with a toll on a visit will not come back. The Superfast ferry service to Rosyth is obviously aimed at people who drive. There is a fear that people will come off the ferry and drive up to the Highlands, by-passing Edinburgh completely, if this goes ahead."
Alastair McIntosh, managing director of the Scotch Whisky Heritage Centre (http://news.scotsman.com/topics.cfm?id=477&id=390612004) |
"Under the current plans, people will have to pay to drive to my guest houses in Newington outwith the rush hour, which I’m dead against. All of my guests who drive here leave their cars here once they arrive and take the bus around town, but they’re still going to be penalised." David Hinrichs, head of the Edinburgh Hotel and Guest House Association (http://news.scotsman.com/topics.cfm?tid=477&id=390612004)

“(Royal Mail) has already warned city chiefs it will be among the worst hit by the introduction of road tolls, and claims it could add at least £150,000 to the cost of its business delivery operation every year. In a letter to council leader Donald Anderson, director of Scottish affairs Ian McKay said the Royal Mail should win an exemption.” Royal Mail (http://news.scotsman.com/topics.cfm?tid=477&id=390592004)

“Whilst those companies that deploy mainly motorcycles appreciate the exemption for PTWs (powered two-wheelers), the scheme will be perceived
and experienced by most Edinburgh and other Scotland-based courier and despatch firms as yet another tax on their businesses. Their clients still require their services and they have no alternatives to leaving and entering the area. Over time they envisage paying huge amounts of money simply in order to conduct their business. Some Edinburgh-based firms may be tempted to convert to PTWs to take advantage of the exemption. However not only will this be a very costly venture for proprietors but it will result in large-scale unemployment for perhaps thousands of experienced and safe drivers. As well, insurance costs, dictated by virtual monopolies, are becoming almost prohibitively high for motorcyclists. Once firms realise this, they will abandon conversion plans and consider liquidation instead. Firms based outside Edinburgh that enter with deliveries may at first welcome the charge. They feel they will be able to pass the costs directly on to their customers, including perhaps a slight rise in charges which have been held artificially low.
for several years due to the tight profit margins in the industry (see figures recently produced by the Office for National Statistics). However, this euphoria will be at best short-term and at worst, illusory. It is our belief that because the market is and always has been highly competitive, their customers will eventually refuse to pay the extra amounts and instead, seek out other, cheaper carriers, traders who are perhaps less reputable, less established, less safe. Again, there is the prospect of business closures, along with greater danger on the roads. If the scheme goes ahead as planned, congestion will simply be moved around Edinburgh. Congestion at the perimeters of the charging area will be a likely consequence. Other interested groups have made this point, but it is no less significant for our industry, and no less dire for my members and members of the public living and working around these areas. Deliveries could ‘change hands’ at the border, with one firm not venturing in and the other not venturing out. Lay-
bys, bus lanes, even private drives may be used for this charge-avoidance manoeuvre. The scheme effectively implies that there is a two-tier transport business in Edinburgh, one, the business of transporting people, and the other, the business of conducting business. Giving Edinburgh taxis full exemption states unequivocally that the former is by far more important than the latter. From our perspective, both are of equal value. The Despatch Association agrees that congestion must be reduced. However, unfairly penalising an important part of the business community in so doing will not succeed. If, however, there is to be a scheme, then courier and despatch firms ought to be exempt from the charge, fully exempt if operating from within the proposed charge area and 90% discounted if entering the area to serve their business client 'residents'. We also support the position that argues for an improvement in public transport, roads, signing, traffic regulations and informing the public first as a means for generating alternatives to

| bys, bus lanes, even private drives may be used for this charge-avoidance manoeuvre. The scheme effectively implies that there is a two-tier transport business in Edinburgh, one, the business of transporting people, and the other, the business of conducting business. Giving Edinburgh taxis full exemption states unequivocally that the former is by far more important than the latter. From our perspective, both are of equal value. The Despatch Association agrees that congestion must be reduced. However, unfairly penalising an important part of the business community in so doing will not succeed. If, however, there is to be a scheme, then courier and despatch firms ought to be exempt from the charge, fully exempt if operating from within the proposed charge area and 90% discounted if entering the area to serve their business client 'residents'. We also support the position that argues for an improvement in public transport, roads, signing, traffic regulations and informing the public first as a means for generating alternatives to | |
congestion in Edinburgh.”
Despatch Association
(http://www.despatch.co.uk/magazine/oct02/da_news.shtml#1)
“The introduction of additional transportation charges is, however, likely to have an impact on property values in the city. All the recognised economic models of land value theory illustrate that the further from the centre of the marketplace a property is located, then the greater the transportation costs and the lower the value. Consequently, it is likely that the introduction of a congestion charge could lead to businesses deciding to relocate from the city centre and could ultimately distort the established property value pattern.” George Nisbet, partner, DM Hall (chartered surveyors)
(http://news.scotsman.com/topics.cfm?tid=477&id=449432004)
“The introduction of a congestion charge could redirect shoppers away from the city centre to such shopping malls as the Almondvale in Livingston, where parking is free, shoppers are undercover and there is no need to contend with the elements along Princes
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<th>George Nisbet, partner, DM Hall (chartered surveyors)</th>
<th>&quot;In Edinburgh, we have said from the outset that we do not oppose congestion charging in principle but we firmly believe that if implemented in its current form, it will impose disproportionate consequential damage to the local economy. On that principle we believe the Edinburgh scheme should be a single cordon, peak hour scheme only. It is our view that the current proposals are little more than a blunt instrument which will result in damaging Edinburgh's reputation as a major retail centre.&quot;</th>
<th>Sir Stuart Hampson, chairman John Lewis Partnership (<a href="http://news.bbc.co.uk/2/hi/uk_news/scotland/3645057.stm">http://news.bbc.co.uk/2/hi/uk_news/scotland/3645057.stm</a>)</th>
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<td>Small Business</td>
<td>&quot;…small business in central Edinburgh will see declines in turnover and income, and will relocate, leaving central Edinburgh a no-go area” Tim Steward, Federation of Small</td>
<td>&quot;We were disappointed to find that the much publicised consultation on the New Transport Initiative - congestion charging to those likely to suffer from it! - had failed to reach out&quot;</td>
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<td>Businesses’ (<a href="http://news.scotsman.com/edinburgh.cfm?id=364062004">http://news.scotsman.com/edinburgh.cfm?id=364062004</a>)</td>
<td>as far as our Association. Following representations to the Executive Member responsible, Councillor Andrew Burns, he has offered to make a presentation to members. We propose to make this the subject of a members meeting in late October; more details when dates and times have been firmed up,” Edinburgh Old Town Business Association (<a href="http://www.edinburgholdtown.co.uk/news.htm">http://www.edinburgholdtown.co.uk/news.htm</a>)</td>
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<td>“This issue has not been given sufficient attention and I don’t think it has been made clear that these are additional exemptions. What about other vital services? Is every gas fitter, every plumber, every electrician going to have to pay?” Tim Steward, Federation of Small Businesses’ (<a href="http://news.scotsman.com/edinburgh.cfm?id=350732004">http://news.scotsman.com/edinburgh.cfm?id=350732004</a>)</td>
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<td>“There would be a huge hue and cry if the AA and the RAC are exempted and we don’t get the same privileges as they do. If they are going to be exempt we should certainly be exempt as well. There are plenty of small driving businesses in Edinburgh who will have to put their prices up so that the congestion charging doesn’t eat into their profits. It will impact on everybody.” Gerry Shaw, owner A1 Driving Tuition in Edinburgh (<a href="http://news.scotsman.com/edinburgh.cfm?id=350732004">http://news.scotsman.com/edinburgh.cfm?id=350732004</a>)</td>
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<td>Local Politicians</td>
<td>&quot;The problem they [the council] have got is if they have any exemptions, then the whole thing breaks. This exemption is likely to result in exemptions for doctors and hospital workers and nurses and all these other groups. I think more and more exemptions will come and I don’t see how the council can possibly refuse them.&quot; Lib Dem transport spokesman Fred Mackintosh (<a href="http://news.scotsman.com/edinburgh.cfm?id=350732004">http://news.scotsman.com/edinburgh.cfm?id=350732004</a>)</td>
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<td>&quot;These are companies which will help to ease congestion. I don’t think it (the exemptions for breakdown companies) will lead to us having to hand out exemptions to other groups. Driving instructors will only have to add a small charge on to the cost of a lesson, while we believe delivery companies will make back what they pay on the tolls because of the speed with which they will be able to operate in the city centre.&quot; City of Edinburgh Council leader Donald Anderson (<a href="http://news.scotsman.com/edinburgh.cfm?id=350732004">http://news.scotsman.com/edinburgh.cfm?id=350732004</a>)</td>
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<td>&quot;Our aim in introducing congestion charging is not to stop car journeys altogether, but to offer a balanced choice, and provide the necessary public transport to benefit businesses, workers, shoppers and tourists.” Andrew Burns, Edinburgh city council’s executive member for transport (<a href="http://news.scotsman.com/edinburgh.cfm?id=338502004">http://news.scotsman.com/edinburgh.cfm?id=338502004</a>)</td>
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<td>&quot;The whole purpose of the charges is to persuade drivers to enter the city after the rush hour, to enable emergency vehicles,</td>
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<td>&quot;This inquiry is turning into a farce. How can objectors present their case and challenge the council decision when they won’t be able to read the other objections or even know who the other 1,461 objectors are?&quot; Fred Mackintosh, the Lib Dems’ acting transport spokesman (<a href="http://news.scotsman.com/edinburgh.cfm?id=364062004">http://news.scotsman.com/edinburgh.cfm?id=364062004</a>)</td>
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<td>&quot;(Congestion charging is) nothing more than an additional tax on motorists. Road tolls will bring no benefits to any of the cities in which it is introduced - it will only serve to punish certain groups of people.” Scottish Tory leader David McLetchie (<a href="http://news.bbc.co.uk/1/hi/scotland/2770257.stm">http://news.bbc.co.uk/1/hi/scotland/2770257.stm</a>)</td>
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<td>&quot;I will be campaigning against it [the charge]. The tram lines need to be built first and their effect on congestion taken into account before any charge is levied.&quot; Liberal Democrat Councillor John Longstaff (<a href="http://news.scotsman.com/features.cfm?id=255032004">http://news.scotsman.com/features.cfm?id=255032004</a>) (When asked whether she was willing to pay a congestion charge) &quot;As a woman, I feel</td>
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<td>&quot;(I use my car) as often as I can - for work, for play, for shopping, for visiting, for what it was intended. I am not thrilled about congestion charging. (But) there’s too many people like me who love their car and it’s undeniable we’re going to have to pay a larger price for it.” Labour Councillor Elizabeth Maginnis (<a href="http://news.scotsman.com/features.cfm?id=255032004">http://news.scotsman.com/features.cfm?id=255032004</a>)</td>
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also agreed with city centre traders’ fears the road tolls would push shoppers away from the centre of Edinburgh.” City council’s Liberal Democrat group (http://news.scotsman.com/topics.cfm?id=477&id=254772004)

“Businesses in Scotland already pay higher rates than the rest of the UK and city entry charges will simply put business in Edinburgh at an even greater competitive disadvantage.” Scottish Tory leader David McLetchie (http://news.bbc.co.uk/1/hi/scotland/2770257.stm)

“I am a very keen environmentalist but I think this is a clumsy tax which doesn’t tax congestion, doesn’t tax pollution, doesn’t tax fuel consumption and will put the cause of environmentalism in this city back 20 years. It will hit Edinburgh’s economic performance in far more ways than just the retail sector.” Lib Democrat Councillor, Paul Edie (http://news.scotsman.com/features.cfm?id=255032004)

“Most car journeys would not buses and essential traffic to move faster and to spend less time stuck in traffic jams. Better public transport for all, paid for by the charges, will reduce journey times, pollution, noise and injuries. Without charging, journey times into Edinburgh are expected to double in the next 15 years. It is always unpalatable to pay extra — but sometimes it is necessary to do so to improve the quality of life for everyone.” Chris Ballance, Green MSP (http://www.bordertelegraph.com/news/archivestory.php/aid/6208/Concern_charging_in_Edinburgh.html)

“The only way Edinburgh is going to avoid grinding to a halt and have a world class public transport system is through a congestion charge.” Mark Ballard, Lothian Green MSP (http://www.scottishgreens.org.uk/news/2004/feb/170204success.htm)

“I use the bus on a daily basis and also use taxis depending on where I am going and how quickly I need to be there. I think congestion charging will be good for essential car drivers and will reduce unnecessary journeys. The London scheme has been a huge success, and if Edinburgh there is an issue of personal safety using buses, particularly as I would then have to walk along a driveway with trees and bushes on one side and there has been an incident there before.” Conservative Councillor Kate MacKenzie (http://news.scotsman.com/features.cfm?id=477&id=429912004)

“The problem is the scheme is designed to deal with car commuters, and in dealing with them it also has an effect on people who aren’t causing congestion.” Lib Dem transport spokesman Fred Mackintosh (http://news.scotsman.com/topics.cfm?id=477&id=429912004)

“Every couple of days a new group comes along with a justifiable reason for being exempt from road tolls. This council should do the logical thing and abandon [the scheme] now.” Conservative transport spokesman Allan Jackson (http://news.scotsman.com/topics.cfm?id=477&id=429912004)
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<th>have to pay the charge. (Douglas Andrews, representing Fife Council, put it to Mr Burns that trips in the area between the outer and inner cordons, which would not incur a charge, accounted for 59 per cent of car journeys taken in the Capital. And with a further five per cent of journeys being taken within the inner cordon, 64 per cent of all trips would be exempt.)” Andrew Burns, Edinburgh City Council transport leader (<a href="http://edinburghnews.scotsman.com/index.cfm?id=480182004">http://edinburghnews.scotsman.com/index.cfm?id=480182004</a>)</th>
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<td>citizens vote for it we will implement a scheme in the city.” Leader Edinburgh City Council Donald Anderson (<a href="http://news.scotsman.com/featur">http://news.scotsman.com/featur</a> es.cfm?id=255032004) “Two pounds to clean up the air and free up the streets seems a bargain to me.” Labour Councillor Trevor Davies (<a href="http://news.scotsman.com/featur">http://news.scotsman.com/featur</a> es.cfm?id=255032004) “Congestion charging can only have a positive impact on tourism as it will ultimately deliver improved air quality and better public transport that will encourage greater numbers of visitors to Edinburgh.” Edinburgh City Council transport leader, Andrew Burns (<a href="http://news.scotsman.com/topics">http://news.scotsman.com/topics</a>. cfm?id=477&amp;tid=390612004) “If we don’t address congestion we will all be worse off. If we sit on our hands, Edinburgh and the surrounding region will have more congestion, more delays, more pollution and a less attractive quality of life for us all. If we are serious about the long-term prosperity of Edinburgh then we must have a charging system on the proposed timetable. Without one, our ambitious, integrated transport initiative cannot be</td>
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<td><strong>Disability and Equal Opportunities Groups</strong></td>
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### Police

"Our main concern is the impact it may have on the force to recruit new officers, who start on relatively low wages and are already being forced to live outwith Edinburgh because of property prices." Ian Woodhead, secretary of the Lothian and Borders Police Federation (http://news.scotsman.com/topics.cfm?tid=607&id=86142004)

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### Health sector

"NHS Lothian wants the council to exempt staff such as health visitors and on-call GPs if they have to pay tolls in the course of their duties, as reimbursing them would cost at least £1 million a year. From a public health point of view we support the policy, but our objections are around the charges that they propose to levy against patients and staff. We would prefer that they look at the policy in London where exemptions have been made for patients and staff." NHS Lothian (http://news.scotsman.com/archive.cfm?id=353942004)

"It is our belief that congestion charges can only be acceptable once public transport is improved. It will therefore be...

"Other potential effects of congestion charging (in London) include improvement in access for emergency vehicles." Joffe and Mindell, British Medical Journal April 2003 (http://bmj.bmjjournals.com/cgi/content/full/326/7394/884)

"Any congestion scheme must apply equally to everyone, including transport for members of the Scottish Executive (including Ministers) and City officials (including the Lord Provost)."

Royal College of Physicians of Edinburgh (http://www.rcpe.ac.uk/news/consultation_docs/have_your_say.html)

"Congestion charging alone (in London) could adversely affect equity: road space vacated by people who are deterred by the charge could be occupied by the wealthy, who are less price sensitive." Joffe and Mindell, British Medical Journal April 2003 (http://bmj.bmjjournals.com/cgi/content/full/326/7394/884)
| Essential that public transport is improved significantly so that journey times on buses and trains begin to match the private car or taxi - for busy professionals this is a significant barrier to efficiency. | Royal College of Physicians of Edinburgh (http://www.rcpe.ac.uk/news/consultation_docs/have_your_say.html)

“The College is very dependent on the services of Fellows working in hospitals in Lothian, Borders, Fife and Tayside. Particularly affected are those working in the RIE and WGH who often visit the College. The New Royal Infirmary and Medical School are outside the inner circle (Option A), and the charges will add to journey times for Fellows living and working outside the inner City (and beyond in central Scotland) but who need to travel to the College quickly for committees and other essential work (often in the early evening).” Royal College of Physicians of Edinburgh (http://www.rcpe.ac.uk/news/consultation_docs/have_your_say.html)

“We disagree that less car travel (in London) will result in fewer crashes; this impact is difficult to predict. It depends whether journey times are shorter because of less time queuing at junctions or because of higher speeds. If traffic reduction is greater than was predicted, travel speeds may become substantially faster. While shorter journey times could reduce exposure to the risk of collisions, higher speeds could increase the risk by a greater amount.” Joffe and Mindell, British Medical Journal April 2003 (http://bmj.bmjournals.com/cgi/content/full/326/7394/884) |
"NHS services are complemented by a range of services provided by the voluntary sector and by colleagues and local authorities. Any impact that the congestion charge has on these complementary services, for example by reducing their ability to provide services to residents within charging zones, may be expected to affect NHS services in two ways. Firstly, increased demand on community-based health service staff such as district nurses, community nurses and GPs and secondly, through increased in-patient admissions and bed blocking in acute hospitals if social care services are unable to continue their support of ill or frail people in the community." Murray Duncanson, chief executive of primary care division of NHS Lothian (http://news.scotsman.com/edinburgh.cfm?id=474052004)

"A major concern in primary care with regard to patients is the possibility that demand on community-based services will increase as a result of the
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<th>charges. There is a probability that patients will alter their behaviour to avoid being charged and request more home visits and increase demand for GPs’ out-of-hours services.” Murray Duncanson, chief executive of primary care division of NHS Lothian (<a href="http://news.scotsman.com/edinburgh.cfm?id=474052004">http://news.scotsman.com/edinburgh.cfm?id=474052004</a>)</th>
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<td>&quot;Pedestrianisation would make for a much more pleasant environment, turning the whole city centre into a shopping, entertainment and leisure precinct where people can walk unhindered by traffic.&quot; “Congestion charging is detrimental to retailers.” Professor Michael Bell, Imperial College London (<a href="http://news.scotsman.com/edinburgh.cfm?id=338502004">http://news.scotsman.com/edinburgh.cfm?id=338502004</a>)</td>
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<td>&quot;Many respondents (to a national survey of specialist knowledge within business, the property development industry, government, and academia) said that retail is potentially the most sensitive sector, but that isolating the impact of the road user charging from the national &quot;The results of the (survey of specialist knowledge within business, the property development industry, government, and academia) show that hypothecation of revenues into public transport and the environment have the potential to enhance business performance and location in a charged city centre; but there is a great deal of uncertainty and trepidation about the ability of government bodies to bring about the required changes, and how long it will take.” Dr. Tim Whitehead, Transport Policy 9 (3) 221-240</td>
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<td>“The respondents reported that high order office functions (corporate head offices, regional headquarters, and specialized service functions such as national &quot;…road tolls are like VAT which is generally considered to be a regressive tax. It looks like a proportional tax but it is not, because poorer families save a smaller proportion of their income than rich families. Paying VAT is therefore regressive, and RUC in this sense is regressive. It can be confusing when it comes to the question of who pays the costs of congestion. Many trips in many cities are made by relatively low income families, but public transport tends to be radial, and heavy industry does not take place in the inner cities. So it's over-simplistic to say that by improving public transport, poorer families benefit at the expense of the richer.” Professor Christopher</td>
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and international consultancies and finance, marketing, management, insurance, publishing, and advertising) "would pay a premium for a prestige city-centre location", and that they tend to agglomerate in a 'few choice centres' due to 'an inertia that would be strong enough to override any effects' of a road user charge." Dr. Tim Whitehead, Transport Policy 9 (3) 221-240

"Tourists were not seen as price sensitive to road user charging because, as another respondent reported, "they are traveling from a great distance and make their decisions on how they travel separate from a road use tariff". Other respondents said that the "perceived attractiveness of a place is more important than traffic policy", and "tourists accept extra costs because they represent the image and the programme that they are after... Tourists are put off by the congestion and poor environment created by motorised traffic so, as one respondent noted, "something that improves the environment will actually increase the attraction". Tim Whitehead, Transport Policy 9 (3) 221-240

"In-depth studies of public concerns about proposed road user charging schemes have revealed a number of issues, ranging from the reliability of the technology to a lack of acceptance of the principle of direct charging. However, the most pervasive and deep-seated concerns relate to the 'fairness' of the scheme. In political terms too, equity is a key issue, but one that has received relatively little attention by academics or practitioners." Professor Peter Jones, Transport Studies Group, University of Westminster (http://www.transport-pricing.net/jonel.doc)
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<th>Transport lobby groups</th>
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<td>“Edinburgh City Council believe that congestion charging will have an impact on the number of cars that travel into the city each day, but our survey shows that 60 per cent of drivers will not change their driving habits and will continue to use the car.” Neil Greig, Head of Policy, AA Scotland <a href="http://www.aatrust.com/aamotoringtrust/pdf/edinburgh_congestion.pdf">http://www.aatrust.com/aamotoringtrust/pdf/edinburgh_congestion.pdf</a></td>
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<td>“Most drivers would support toll revenue being spent on public transport improvements. This reflects their view that existing public transport won’t be able to cope with any extra demand that congestion charging may create.” Neil Greig, Head of Policy, AA Scotland <a href="http://www.aatrust.com/aamotoringtrust/pdf/edinburgh_congestion.pdf">http://www.aatrust.com/aamotoringtrust/pdf/edinburgh_congestion.pdf</a></td>
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<td>“Edinburgh has allowed the image (that it is anti-car) to grow. It’s too late for the council to change that image, with green lanes, Blue Meanies, congestion charging . . . all these measures are seen as being anti-car, whereas if they’d presented it in a more positive way, they might have avoided that. They’re the only ones bringing in congestion charging so they’re the main focus of our attention at the moment.” Neil Greig, Head of Policy, AA Scotland <a href="http://news.scotsman.com/features.cfm?id=250262004">http://news.scotsman.com/features.cfm?id=250262004</a></td>
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| Edinburgh’s congestion charge will only be paid by those who drive private motor vehicles. The charge will not, by definition, be paid by the 42% of Edinburgh’s households who have no access to a car: these households will predominantly be the City’s lower income households. These households will not have to pay the congestion charge yet can only benefit from the implementation of road user charging through the public transport and environmental improvements promised as a result of investment of the net revenues from the charge. There are well-established correlations between higher income and car ownership and use and as such the impact of the charge is very likely to fall largely upon higher income groups.” Colin Howden Transform Scotland Campaign Manager [http://www.transformscotland.org.uk/info/docs/ColinHowdenPrecognition.pdf](http://www.transformscotland.org.uk/info/docs/ColinHowdenPrecognition.pdf) |

| “We believe that congestion charging would make a real difference to all who work and live in the city… The principal beneficiaries of course will be the 46% of Edinburgh’s households who have no access to a car.” Friends of the Earth Scotland |

| Edinburgh’s congestion charge will only be paid by those who drive private motor vehicles. The charge will not, by definition, be paid by the 42% of Edinburgh’s households who have no access to a car: these households will predominantly be the City’s lower income households. These households will not have to pay the congestion charge yet can only benefit from the implementation of road user charging through the public transport and environmental improvements promised as a result of investment of the net revenues from the charge. There are well-established correlations between higher income and car ownership and use and as such the impact of the charge is very likely to fall largely upon higher income groups.” Colin Howden Transform Scotland Campaign Manager [http://www.transformscotland.org.uk/info/docs/ColinHowdenPrecognition.pdf](http://www.transformscotland.org.uk/info/docs/ColinHowdenPrecognition.pdf) |

| “We believe that congestion charging would make a real difference to all who work and live in the city… The principal beneficiaries of course will be the 46% of Edinburgh’s households who have no access to a car.” Friends of the Earth Scotland |
| Transport sector | "Our customers will have to absorb the cost, because we can't afford to, which is something the AA or the RAC won't have to do. The congestion charging scheme will have an impact on the charges we make and that will have to be passed on to the business community. Without the service we provide to the business community, it would not be able to function as it does now." David Bennett, director of city-based business delivery service Eagle Couriers ([http://news.scotsman.com/edinburgh.cfm?id=350732004](http://news.scotsman.com/edinburgh.cfm?id=350732004)) | "The whole scheme is supposed to be about congestion and we see ourselves as helping reduce congestion. The council accepted that breakdown vehicles (which are to be exempt from charges) were a useful method of reducing congestion." Neil Greig, head of policy at the AA ([http://news.scotsman.com/edinburgh.cfm?id=350732004](http://news.scotsman.com/edinburgh.cfm?id=350732004)) | "(Congestion charging is) necessary to maintain the economic vibrancy of the city. We believe that with Edinburgh growing as fast as it is, the city's traffic will slow down even further. We wish to ensure congestion-free streets for a prosperous Edinburgh." Stephen Howell, Transport Initiative Edinburgh ([http://news.bbc.co.uk/1/hi/scotland/2770257.stm](http://news.bbc.co.uk/1/hi/scotland/2770257.stm)) | "If there is an overwhelming opposition to congestion charging as the mechanism for doing this (funding change in the quality of public transport in the whole of south-east Scotland), then..."  |
impacts of the scheme would be "at most modest and in many cases imperceptible". David Simmonds, Transport Consultant (http://news.scotsman.com/edinburgh.cfm?id=495872004)

"I am aware that it is the case that the distribution and catering sector, which includes retail but has a much broader scope, is the sole sector which carries a negative value impact, of around £70m a year." Andrew Holmes, Head of City Development, City of Edinburgh Council (http://edinburghnews.scotsman.com/index.cfm?id=484152004)

obviously we will have to look again at other ways. We don’t feel that there are other ways that we can gain anything like the same levels of improvements, but we will have to take that decision on board and decide how to proceed after that." John Saunders, then Project Manager at the City of Edinburgh Council (http://www.bordertelegraph.com/news/archivestory.php/aid/3672/Council_drive_for_congestion_charge.html)

"We cannot ignore the city's nightmare problem of traffic congestion. Doing nothing about the issue is not an option and ignorance will have a detrimental effect on Edinburgh's economy and environment. We simply have to get people out of their cars." John Saunders, project integration manager, TIE (http://www.sepa.org.uk/publications/sepaview/html/18/congestion_chargnig.htm)

"Edinburgh is a highly successful city with a strong and growing economy, as well as being a centre of cultural excellence and the home of the World Heritage Site. I am in no doubt that if we are to maintain this growth some form of traffic demand management must be
| Voluntary sector/community and umbrella groups | “It will in time drive trade and commerce away from Edinburgh to other places where such charges are not applied.” Dr Alan Werninck, Association of British Drivers (http://www.jbaird.org.uk/abd/congestion%20reply.html) “All of Edinburgh’s citizens will be adversely affected by the needless proposed congestion charge. Companies and businesses whose employees face these charges will pass the charges on to their customers making goods and services more expensive that they otherwise would have been. This is already happening due to the excessive overcharging for parking in the city.” Dr Alan Werninck, Association of British Drivers (http://www.jbaird.org.uk/abd/congestion%20reply.html) | “…Congestion Charging should not discriminate against disabled members who, because of their mobility problems, cannot access public transport and require to use their vehicle to get to and from work.” UNISON Edinburgh (http://www.unison-edinburgh.org.uk/meetings/10) “…Residents Associations wrote to the Council… asking that residents within the inner cordon might be exempted from the charge, citing in support the fact that, inside the London cordon, residents benefit from a 90% reduction. This plea has been ignored in the Council’s final scheme. This means that if central area residents cross the inner cordon coming into the area between 7 am and 6.30 pm Monday to Friday, they will have to pay a £2 charge. This is | “City of Edinburgh Council has made every effort to communicate the reasons why congestion charging is so important for the city…” Andy Moore and John Lamb, Scottish Environmental Protection Agency (SEPA) (http://www.sepa.org.uk/publications/sepaview/html/18/congestion_charging.htm) |
“UNISON members who currently use their vehicle to carry out their duties and are authorised car users should not be financially disadvantaged.” UNISON Edinburgh
(http://www.unison-edinburgh.org.uk/meetings/10)

| obviously a serious matter for anyone regularly needing to use their car to travel to work outside the central area and returning before 6.30 pm, amounting to a cost of about £450 a year.  
As the inner cordon separates central area residents from many local facilities, they are likely to end up paying for driving to numerous destinations.  
It is worthy of note that the City has decided to restrict the operation of the outer cordon to the morning peak period between 7 am and 10 am. This in effect will allow all residents of the City to travel to work outside the City, or between the cordons within the City, without paying the charge, EXCEPT those central area residents living within the inner cordon.  
Also, the majority of residents, who live between the inner and outer cordons, will be able to travel anywhere in the City, except the central area, free of charge.” Drummond Civic Association on-line petition (http://www.petitiononline.com/e
“Congestion should be reduced by other methods than charging and that, if charging must proceed, then a discount should be given to local residents.”

Stockbridge Community Council

“We were particularly concerned about various amendments to the original, relatively simple scheme that were now on the agenda, in particular an extra £1 charge to enter the inner cordon and the proposed discount to Forth Bridge commuters. Both could have increased negative effects on Pilrig.”

Unlike most ‘professional travel’, the purpose of ministerial duties is not revenue-raising. Most ministers are likely to cross congestion cordons in the normal course of pastoral duties. The nature and scheduling of visits to people who are housebound, hospitalised or bereaved, as well as the conduct of funeral
services, normally necessitate the use of a car. Despite the modest level of the charge, the extra cost to churches within the bounds of the presbytery could be in excess of £20,000 per year. We believe it is obviously unreasonable to charge ministers £2 for driving to or from a funeral, or to pass on the charge to the bereaved or everyone visited in hospital. Therefore, the most sensible way forward would be for religious workers on pastoral duties to be included in the group to be exempt from the charge, should the scheme eventually go ahead.” Rev Paul Middleton, convener of the presbytery’s social and community interests committee (http://news.scotsman.com/scotland.cfm?id=449992004)

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<td>Advice/findings from London</td>
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<td>“The Royal Institute of Chartered Surveyors has said the retail sector is the ‘big loser’. (It reports that) a study this week indicates that 90% of retailers and 75% of leisure occupiers view the charge”</td>
<td>“Don’t do it for the money. I always emphasise this wasn’t a tax on motorists; it was about freeing up the city. You have to have good public transport alternatives in place. None of us anticipated the shift to the bus.”</td>
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negatively, and believe turnover is suffering.”

“(In London), (s)maller businesses appear less able (than larger businesses) to take advantage of the reduced congestion. This is exacerbated by the widespread practice of suppliers imposing surcharges for services provided inside the congestion charging zone. These appear to be based on the cost increase aspect of the charge rather than the overall financial impact.” Commission for Integrated Transport

“Taxi’s fare revenue has declined as journey times have reduced, and this has occurred at the (same) time as passenger patronage has fallen.” Commission for Integrated Transport

“The subcontract nature of this industry, combined with relatively unsophisticated management systems, and poor trading conditions appears to have led to businesses passing on the direct costs of...”

Mayor of London Ken Livingstone

“72% of companies in London believe the road charging experiment is working, with only 14% convinced it is a failure.”

Lobby group London First

“Most managers of larger businesses report that the potential benefits flowing from improved transport speeds and reliability should reduce the cost of operating in Central London.” Commission for Integrated Transport

“The Private Hire trade does not appear to have changed its pricing structure in response to reduced journey times; consequently, for a trip within the congestion charge zone, the operator has the potential to make additional profit.” Commission for Integrated Transport

“The Private Hire trade does not appear to have changed its pricing structure in response to reduced journey times; consequently, for a trip within the congestion charge zone, the operator has the potential to make additional profit.” Commission for Integrated Transport

“Journeys (for couriers) are now quicker (for both four-wheeled and to a lesser extent, two-wheeled vehicles) and journeys...”
the charge to their clients… In the short term, the courier sector is using the surcharge to cover poor trading conditions and consequent over supply. In the medium term, if trading conditions do not recover, the courier sector may downsize and customers will then reap the benefits of more competitive pricing.” Commission for Integrated Transport (http://www.cfit.gov.uk/research/cc/specific/)

“A number of (convenience store) businesses report suppliers reducing service levels (for example three deliveries a week in place of daily deliveries) and / or imposing surcharges for deliveries. Smaller businesses appear to be finding it difficult to challenge these costs. “Commission for Integrated Transport (http://www.cfit.gov.uk/research/cc/specific/)

are more predictable, thus allowing companies to commit to tighter deadlines.” Commission for Integrated Transport (http://www.cfit.gov.uk/research/cc/specific/)

“(Convenience stores’) potential customer transport patterns have changed and businesses have been affected, some positively, some negatively. Chains of stores report that whilst some stores inside the zone have seen volumes decline, others are benefiting from the change. The picture therefore appears to be relatively balanced inside the zone.” Commission for Integrated Transport (http://www.cfit.gov.uk/research/cc/specific/)

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<td><strong>Large Business</strong></td>
<td>“Having carried out research with our members there is overwhelming favour for tackling congestion and improving the environment. However the proposals as put forward, impose a tariff on the free movement of staff, customers and goods to and from Edinburgh and this will have a huge impact on Midlothian businesses. Businesses agree there is not enough public transport available at this time for people to have a choice and are concerned that they have not been included in consultation on the economic issues.” Midlothian Chamber of Commerce Gregor Murray, Executive Director (<a href="http://www.midlothian.gov.uk/news/PressReleases/PressReleaseView.asp?id=1028">http://www.midlothian.gov.uk/news/PressReleases/PressReleaseView.asp?id=1028</a>)  “Concerning the Garden Centre and the Butterfly Farm – anything that distorts the free movement of people to and from Edinburgh has an adverse effect. Those of us on the periphery of Edinburgh will be most affected…Tourism will be seriously hit. First there is the ‘psychological effect. The entrance fee to Butterfly World...”</td>
<td>“(!)f this (the introduction of the charge) leads to an increase in demand for property outwith the designated zone area, this will ultimately lead to an increase in values in that area and the possibility of a reduction in values within the designated zone. The very fact of reducing congestion in the city centre could, therefore, have an adverse influence on business viability and property values and, ultimately, city centre property rents and values could fall…It is, therefore, worth pointing out to the city council that, rather than a lucrative source of revenue generation, the introduction of a congestion charge is more likely to lose it significant revenue by encouraging businesses to relocate outwith the city centre.” George Nisbet, partner, D M Hall (chartered surveyors) <a href="http://news.scotsman.com/topics.cfm?tid=477&amp;id=449432004">http://news.scotsman.com/topics.cfm?tid=477&amp;id=449432004</a></td>
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<td>is £4. If visitors have to pay a further £2 to get there, this is likely to affect their decision.” James Barnes, Chairman of Midlothian Chamber of Commerce (MCCE) and Chief Executive of Dobbies Garden Centres PLC (<a href="http://www.midlothian.gov.uk/news/PressReleases/PressReleaseView.asp?id=1028">http://www.midlothian.gov.uk/news/PressReleases/PressReleaseView.asp?id=1028</a>) “It looks as if we will get a tariff on the free movement of people and goods to Edinburgh, which is Midlothian's biggest market, and this could have a detrimental effect.” Gregor Murray, Midlothian Chamber of Commerce (<a href="http://test.thecourier.co.uk/output/2003/11/04/newsstory53159870.asp">http://test.thecourier.co.uk/output/2003/11/04/newsstory53159870.asp</a>)</td>
<td>“Unless there are major improvements to public transport, there could be a serious effect on the Midlothian economy. Midlothian Chamber of Commerce and Enterprise opposes the current proposals because of the City of Edinburgh Council's failure to consider adequately the implications for business. “Everybody realises that Edinburgh has a growing problem with congestion. That issue must be tackled if the south-east of Scotland is to continue to benefit from a strong local economy and a decent quality of life. However, it is vital that any congestion charging scheme is formulated in such a way as to benefit residents of the rest of the Lothians, Fife, Exemption from charging for residents of areas such as Currie, Balerno and South Queensferry is deeply flawed. That is not fair to my constituents in Loanhead, Bonnyrigg and Dalkeith, who are just outside the cordon. It is especially unfair on my constituents in Danderhall, who live inside the city bypass. It is</td>
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Indeed, to give one example, those proposals would cost the Peter Walker Group Ltd, which is based in Loanhead in my constituency, £173,000 a year.” Midlothian Labour MSP Rhona Brankin (http://www.ultrasoft.hostinguk.com/brankin/news3.asp?ArtNo=3)

the Borders and beyond. In recent weeks, the City of Edinburgh Council has been doing its best to sell the potential benefits of its proposed scheme to surrounding areas. However, it all smacks of being something of an afterthought, following, as it does, stinging criticism of the proposals from right across south-east Scotland.” Midlothian Labour MSP Rhona Brankin (http://www.ultrasoft.hostinguk.com/brankin/news3.asp?ArtNo=3)


“Two park-and-ride sites and some minor bus improvements — although welcome developments — do not come even remotely close to the substantial public transport improvements that I believe need to be in place before congestion charging is introduced. Members should remember that Midlothian does not even have a train service.” Midlothian Labour MSP Rhona Brankin (http://www.ultrasoft.hostinguk.com/brankin/news3.asp?ArtNo=3)

“The proposal in its current form discriminates against residents of West Lothian commuting to Edinburgh especially those on lower incomes. Residents of West Lothian are being hammered in what can be described as nothing other than another tax.

I can see little or no gain to
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<th><strong>Disability and Equal Opportunities Groups</strong></th>
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<td><strong>Adjacent local authorities</strong></td>
<td><strong>We will be marketing Midlothian as an area to live and work in, an area to travel to work to and an area where you can park your car free of charge. If that means there are businesses in Edinburgh who would like to be relocated to Midlothian, we would welcome that.</strong> Midlothian Council Leader Adam Montgomery (<a href="http://news.scotsman.com/topics.cfm?id=477&amp;id=104286203">http://news.scotsman.com/topics.cfm?id=477&amp;id=104286203</a>)</td>
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<td><strong>&quot;We are now being advised&quot;</strong></td>
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<td>**&quot;The Transport (Scotland) Act 2001 does not legally require the council to share revenue with neighbouring local authorities but it is our clear intention to do so and there is no legal impediment to us doing so. The choice is simple - either they want the potential revenue or they don't.&quot; Councillor Andrew Burns, Transport Leader, City of Edinburgh Council (<a href="http://news.scotsman.com/politics.cfm?id=453202004">http://news.scotsman.com/politics.cfm?id=453202004</a>)</td>
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<td><strong>I am absolutely outraged that the city council has now ignored a warning from its own advisers that exemptions for people living in outlying parts of Edinburgh are unfair…A true congestion charging scheme would treat everyone equally. This certainly is not the case here. City residents who cause traffic congestion will escape payment but other motorists will not. This hotchpotch of a scheme has been amended to try to appease the Edinburgh motoring public. This is not congestion charging.</strong></td>
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<td>public transport improvements in West Lothian. There is no way that current train and bus services would cope with commuters abandoning car use because of tolls. Standing room only on rush hour trains can only lead to a stand-off with Labour's Edinburgh City Council on this issue.&quot; Fiona Hyslop, SNP MSP (<a href="http://www.fhyslop.fsnet.co.uk/fhTax1909.htm">http://www.fhyslop.fsnet.co.uk/fhTax1909.htm</a>)</td>
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| that there may be a legal difficulty with Edinburgh’s proposed scheme. It seems that Edinburgh does not have legal powers under the legislation to share revenue from its scheme. Edinburgh has promoted this road congestion charging scheme and neighbouring councils are not involved. We are seriously concerned that Edinburgh will not have the legal powers to honour its promises." Councillor Willie Dunn, convener of West Lothian Council’s enterprise and development committee (http://news.scotsman.com/politics.cfm?id=453202004)

"Edinburgh has tried to sell the scheme to us on the basis of future investment in public transport. The suggestion now that the city will not be able to fulfil this promise is extremely worrying and a huge flaw in the proposals. It is an issue which we certainly will be returning to during the inquiry." Midlothian Council leader Adam Montgomery (http://news.scotsman.com/politics.cfm?id=453202004)

| Legislation requires any congestion charging scheme to be fair. This is a road toll - an unfair tax on people living outside Edinburgh and we will continue to voice our objections." Councillor Willie Dunn, convener of West Lothian Council’s enterprise and development committee (http://www.westlothian.gov.uk/content/news/latest/276408?s=3338)

"Edinburgh, quite simply, hasn’t consulted meaningfully with anyone but selfishly pursued its own agenda. The points made by Fife Council and the people of Fife, concerned about having to pay twice to go into Edinburgh – once they cross the Forth Road Bridge and again at the congestion cordon – have essentially been ignored at this stage." Councillor Mike Rumney, chair Fife Council’s environment and development committee (http://www.westlothian.gov.uk/content/news/latest/276408?s=3338)

"We remain outraged at the unfairness of the draft order. Midlothian Council will continue to argue for better public transport investment up front" |
before a road charging scheme is introduced. Without this, the congestion charge becomes a tax and that is what people in Midlothian resent most about this scheme.” Councillor Jim Dunsmuir, Midlothian cabinet member for strategic services (http://www.westlothian.gov.uk/content/news/latest/276408?s=3338)

“Whatever way you look at it people travelling into Edinburgh from Midlothian will be worse off when this £2 congestion charge is introduced in 2006. Over 50% of our working population travel into the city every day and these proposals do not provide for what would be absolutely necessary transport improvements to be in place prior to the introduction of the charging scheme. We reckon people will end up paying about £500 a year, almost half a Council tax, but made payable directly to the City of Edinburgh Council. This is about the City wanting to impose congestion charging without having fully considered the effects it will have on the other communities. The decision to exempt Edinburgh residents living outside the
outer corridor from paying to cross it was the final illustration of how divisive and unfair these proposals are." Councillor Adam Montgomery, Leader of Midlothian Council (http://www.midlothian.gov.uk/news/PressReleases/PressReleaseView.asp?id=1028)

“Fife Council’s view is that these proposals are unfair, unreasonable and unworkable and have a profound effect on commuters from all neighbouring authorities. For Fife, the effect is doubled in that we already pay a toll to cross the Forth Road Bridge. Our position is that if these charges are implemented we would demand the bridge fee is deducted from any toll.” Councillor Mike Rumney, Chair of Fife Council’s Environment and Development Committee (http://www.midlothian.gov.uk/news/PressReleases/PressReleaseView.asp?id=1028)

“Fife is not totally opposed to road user charging because we all appreciate that city centre congestion is not going to go away but we find that the proposals are unfair, unreasonable and, in my opinion, unworkable.’ Can it be
| | | fair or reasonable that, with particular reference to Fifers, people from South Queensferry will be allowed to cross the outer cordon for free, whereas those from North Queensferry and others living across the Forth Bridge will not have same exemption?"...because Fifers also had to pay bridge tolls, the total burden they would face could be as high as £700." Councillor Mike Rumney, Chair of Fife Council's Environment and Development Committee [http://test.thecourier.co.uk/output/2003/11/04/newsstory53159870.asp](http://test.thecourier.co.uk/output/2003/11/04/newsstory53159870.asp) "If our people are seen as being punished for going into Edinburgh, why should we not do the same in reverse? We will be looking at road-pricing coming out of Edinburgh for non-Midlothian citizens. I will be raising that with my colleagues in East and West Lothian. The general principle of road tolls is not something we agree with - but if it's going ahead in Edinburgh, we would have to consider it." Midlothian council leader Adam Montgomery [http://news.scotsman.com/topics.cfm?tid=477&id=104286203](http://news.scotsman.com/topics.cfm?tid=477&id=104286203) |
| Affected local authorities | "If this exemption (of funeral corteges and hearses) has been refused, we would be disappointed that people are being made to pay extra to travel to crematoriums when they have no other option." Scottish Borders Council (http://news.scotsman.com/scotland.cfm?id=368462004) | “Transport has always been the “Cinderella service” and a charge would be the carriage that would take the Borders to the ball. Obviously you always know that you are going to be up against it when you try and push something like this. There are times when people have to be innovative and look a little bit beyond the horizon to try and make things a better lot for people in the future. I’m not saying that congestion charges are the answer to everything, but they are certainly an answer to transport problems in the Borders.” Councillor John Ross Scott, Leader of Scottish Borders Council (http://www.bordertelegraph.com/news/archivestory.php/aid/3672/Council_drive_for_congestion_charge.html) |
| Other Government departments | | |
| Police | | |
| Health sector | "We do have concerns that the proposals are not clear on how our ambulance volunteer drivers might be affected. Broadly speaking, we appreciate the benefits of congestion charging, but we do have some concerns. If car drivers were to be charged | "We do have another concern that some patients who would normally self-present for outpatient clinics may try to get ambulance transport because they don’t want to pay congestion charging, or they may not even present at all." Scottish Ambulance Service |
when they are taking patients to and from clinics, that would cost us in the region of £66,000 a year. That money we would have to meet from our existing budget and it’s inevitable that it’s going to have a knock-on effect on services.” Scottish Ambulance Service (http://news.scotsman.com/topics.cfm?tid=477&id=429912004)

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<td>*(O)*ver a third of those with the lowest income have access to a car. It is these who are potentially most at risk from suffering adverse effects as a result of the introduction of RUC… it is necessary to establish the effect of RUC on the behaviour and household budget of socially excluded and people vulnerable to exclusion in relation to engaging in the normal activities of society. If a switch of transport mode from the car would be inevitable it is necessary to find out whether alternative transport is available, accessible, affordable and acceptable. If it were, then RUC would not be creating social exclusion. If such conditions are not met, it is necessary to identify what action is required to ensure</td>
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"Previous research examining the issue of social equity in relation to congestion charging found that as a group people with lower income are less effected by road charges, mainly as result of lower vehicle ownership and utilisation rates. Furthermore, if the revenues from charging are invested in public transport, people with lower income benefit from road charging on the whole as these people use public transport more.

The results of this analysis show that income has a significant effect on whether people from Edinburgh drive across the city centre cordon or either the city centre or outer cordon, and thereby would incur a congestion charge. Other variables that have a significant relationship with whether congestion charging would be incurred are age,
alternatives are in place and mitigate the effects of road pricing.” Frauke Sinclair “Assessment of the Effects of Road User Charging and the Transport Investment Package Proposals on Social Inclusion - Recommendations for Consultation and Appraisal”, Napier University, 2001

economic status, whether an individual drives to and from work and journey purpose.” Frauke Sinclair “Assessment of the Effects of Congestion Charging on Low Income Households in Edinburgh - An Analysis of Scottish Household Survey Data”, Napier University, 2002

Transport lobby groups

“Not only are drivers unhappy about paying to enter their city, but 50 per cent of them believe it will have a bad impact on their family’s quality of life.” Neil Greig, Head of Policy, AA Scotland (http://www.aatrust.com/aamotoringtrust/pdf/edinburgh_congestion.pdf)

“TRANSform Scotland regards it as fair that those non-Edinburgh residents who drive into Edinburgh are charged for the pollution and congestion that Edinburgh’s residents incur as a result. Non-Edinburgh residents who drive into the city make no contribution through Council Tax to Edinburgh’s existing transport infrastructure and as such it is fair that those driving into Edinburgh start paying for the damage they cause.” Colin Howden Transform Scotland Campaign Manager (http://www.transformscotland.org.uk/info/docs/ColinHowdenPrecognition.pdf)

“Money raised from people travelling into Edinburgh from a neighbouring authority will be spent on improving transport links between that authority’s area and Edinburgh,
<table>
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<tr>
<th>Transport sector</th>
<th>Voluntary sector/comm unity and umbrella groups</th>
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<tr>
<td>“…the scheme is an investment opportunity that will provide Edinburgh and southeast Scotland with the transport system that it will need to satisfy the demands of an ever-growing population. Failure to address transport issues will result in more congestion, increased pollution levels, elevated traffic noise and lost revenue as people turn their backs on the city, in favour of the out-of-town developments.” Andy Moore and John Lamb, Scottish Environmental Protection Agency (SEPA) (<a href="http://www.sepa.org.uk/publications/sepaview/html/18/congestion_chargnig.htm">http://www.sepa.org.uk/publications/sepaview/html/18/congestion_chargnig.htm</a>)</td>
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<td>“The proposed congestion charge, especially the double cordon almost certainly does not enjoy any degree of wide approval either within or without Edinburgh. Consultations are very limited because most people do not have the time to put pen to paper to write in against. Matters as important as these should be put out to a proper vote including beyond Edinburgh. Even the limited consultations of the past showed that the current double cordon proposal was the least popular option out of three limited options put to a limited selection of the public.” Dr Alan Werninck, Association of British Drivers (<a href="http://www.jbaird.org.uk/abd/congestion%20reply.html">http://www.jbaird.org.uk/abd/congestion%20reply.html</a>)</td>
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We agree that the congestion problem in the city centre is getting worse, and needs to be addressed by the City of Edinburgh Council (CEC). We believe that the congestion is caused by everyone who drives a car in the City of Edinburgh, not just those who happen to live on the A70 corridor. For this reason, we reject any policies which discriminate against residents living in this area. We live in an era of consumer choice, so we believe it is better to address the congestion problem by providing attractive alternatives rather than by penalising car drivers. We challenge CEC to work actively with companies supplying public transport, so that it becomes the transport method of choice for Edinburgh residents.

<table>
<thead>
<tr>
<th>General public</th>
<th>“I read through a copy of the congestion charging proposal in Peebles Library. I found it contained few facts, but many platitudes, which led me to conclude that Edinburgh Council wished to be seen as one of the pioneers of congestion charging, but had no clear policy on how this could be achieved by an integrated approach, which would benefit equally all those who travel into the city for work, as well as residents of Edinburgh.” Peebles’ resident (<a href="http://www.peebleshirenews.com/news/archivestory.php/aid/6080/Congestion_charging_is_a_dog's_dinner.html">http://www.peebleshirenews.com/news/archivestory.php/aid/6080/Congestion_charging_is_a_dog's_dinner.html</a>)</th>
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<td></td>
<td>“…it could be said that The City of Edinburgh Council are attempting to finance internal Edinburgh transport schemes from non-Edinburgh ratepayers…No mention is made of how areas of the Scottish Borders without any proposed rail link, are to benefit from this travel tax. …No thought appears to have been given by Borders Council as to how some of the money raised from motorists in such areas could be diverted to subsidising fares</td>
</tr>
</tbody>
</table>
or assisting an operator to purchase modern comfortable coaches instead of the antiquarian ones currently on the Peebles to Edinburgh route. After all, the aim is cut down congestion into Edinburgh or is it? The system to record the registration number of cars and sort out the registered address of the owner for billing will be complex and will entail a database of some 24 million vehicles currently registered. It will, therefore, be relatively simple to have a database by postcode of all cars registered in qualifying areas i.e. not served by or likely to be served by rail. This could be used to rebate to the Scottish Borders Council, £1.50 of each relevant charge. The balance of 50p would adequately cover the extra administration, which could be fully automated, as the collection system will have to be.” Peebles’ resident (http://www.peebleshirenews.com/news/archivestory.php/aid/3317/Just_how_will_Peebleshire_benefit_from_congestion_charges_.html)

“...there are a huge number of members who live outwith Edinburgh and as such will
| Experience difficulty in accessing adequate public transport, unless the Council resolve to significantly improve public transport facilities.  
UNISON Edinburgh  
(http://www.unison-edinburgh.org.uk/meetings/10)  
"The charges for funeral parties were unfair. You are taxing people who want to be cremated in the same place as their ancestors. It is odd to be charging hearses - it is like a tax on the dead."  
Jim Nickerson, general manager Edinburgh Crematorium Limited  
(http://news.scotsman.com/scotland.cfm?id=368462004)  
"I would be very disappointed if there was going to be a charge on funeral corteges, for the simple reason it is a low point in people's lives. Certain groups should be exempt from the charges, and the bereaved are one of them."  
Reverend Ian Gilmour, of South Leith Parish Church  
(http://news.scotsman.com/scotland.cfm?id=368462004)  
"We should be exempt, like other essential services. If someone dies and the death is reported to the procurator fiscal,
then the remains will need to be taken to and from the city mortuary which is in the city centre." Phil Spencer, regional manager of funeral director WT Dunbar & Sons (http://news.scotsman.com/scotland.cfm?id=368462004)

"(A focus group) of low income drivers who lived outside Edinburgh but worked in the city… showed that participants were very concerned whether they would be able to afford paying any charges. They also wanted transport investment such as better rail links but again are concerned about the affordability of alternatives to the car. For example, one mentioned the high costs of the bus from the Park & Ride site plus another fare to their place of work. There were fears that workers on the minimum wage would be unable to afford travelling to work in Edinburgh and that therefore they should be exempt from charges."

Frauke Sinclair “Assessment of the Effects of Congestion Charging on Low Income Households in Edinburgh - An Analysis of Scottish Household Survey Data”, Napier University, 2002"
NB Some views have been categorised in a particular section of the matrix because they make suggestions as to how the overall column theme (such as efficiency or equity) may be achieved eg. The Mobility and Access Committee do not comment on congestion charging per se, they concentrate instead on ensuring that exemptions are appropriate to minimise any potential disbenefits to the groups of people they represent when they need to access central Edinburgh. This is therefore categorised as a perspective that contributes to positive discussions of equity issues within the cordon and thus explains its location in the matrix. Similarly, the Royal College of Physicians of Edinburgh implies that it feels there is potential for inequity if certain categories of road users such as politicians are exempt from a charging scheme, thus this comment has been allocated to the inequity section of the matrix.
## Appendix 2 City of Edinburgh Consultees

<table>
<thead>
<tr>
<th>ORGANISATION/BODY RESPONSE</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>1 Lothian &amp; Borders Police</td>
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<tr>
<td>2 Scottish Ambulance Service</td>
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<tr>
<td>3 Lothian &amp; Borders Fire Brigade</td>
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<td>4 The Road Haulage Association</td>
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<td>5 The Freight Transport Association</td>
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<tr>
<td>6 The Automobile Association</td>
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<td>7 The Automobile Association Limited</td>
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<td>8 RAC Foundation for Motoring Ltd</td>
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<td>9 RAC Motoring Services</td>
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<td>10 Lothian Buses plc</td>
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<td>11 First East</td>
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<td>12 Stagecoach Scotland East</td>
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<td>13 Scottish City Link Coaches</td>
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<tr>
<td>14 The Head of Planning, The City of Edinburgh Council</td>
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<td>15 East Lothian Council</td>
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<td>16 Midlothian Council</td>
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<td>17 West Lothian Council</td>
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<td>18 Fife Council</td>
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<td>19 Clackmannanshire Council</td>
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<td>22 Scottish Borders Council</td>
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<td>23 Historic Scotland</td>
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<td>24 The Bridge Master Forth Estuary Transport Authority</td>
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<td>25 Edinburgh Chamber of Commerce and Enterprise</td>
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<td>26 Chairman (Edinburgh Branch) Federation of Small Businesses</td>
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<td>27 The Edinburgh World Heritage Trust</td>
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<td>28 Transform Scotland</td>
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<td>29 Chief Executive, NHS Lothian</td>
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<td>30 The Edinburgh Access Panel c/o City Development Department</td>
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<tr>
<td>31 The Lothian Coalition of Disabled People</td>
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<tr>
<td>32 The Edinburgh Disability Equality Forum c/o Corporate Services</td>
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<tr>
<td>33 Crown Estate Commissioners</td>
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Appendix 3  Stakeholder Format

Direct contact was made with fifteen stakeholders; three of these were institutional agencies and twelve of these were private individuals. Of the twelve members of the public who were consulted, four were from within the cordon and eight were from outwith. All stakeholders were given an undertaking that the information they provided would be held in confidence and only used as background information. Where direct statements have been provided in the report against a named agency, this statement has already been cleared with the agency and is already available in the public domain.

Questions to stakeholders
1. How aware are you of the Edinburgh congestion charging scheme proposal?
2. Have you any experience of any other congestion charging project?
3. Have you any views on the likely efficiency or effectiveness of the proposed scheme?
4. Are you aware of any equity issues in respect of the proposed scheme?
5. Do you foresee any problems in the technical operation of the scheme?
6. Do you think that there are likely to be any variations in views of the scheme, as between different localities within and around Edinburgh?
7. Is there anything you would like to add in respect of the scheme?
8. Do you think you will be directly affected by the scheme?