



UK metric association

Campaigning for a **single** *rational* system of measurement

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23 August 2007

Local Transport Bill Consultation
Department for Transport
Great Minster House (Zone 3/16)
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Dear Sirs

The draft Local Transport Bill – Consultation

On behalf of the UK Metric Association, I am writing in response to your general invitation to comment on the above consultation.

UKMA is an independent, non-party political, single issue organisation which advocates the full adoption of the international metric system (“Système International” - SI) for all official, trade, legal, contractual and other purposes in the United Kingdom as soon as practicable. We also campaign for better consumer protection through accurate and consistent use of metric units of measurement in order to achieve price transparency. UKMA is financed entirely by membership subscriptions and personal donations.

This response was approved UKMA's Committee on 20 August 2007.

Summary

Our response to the consultation is restricted solely to the proposed introduction of road-pricing schemes and, in particular, to the units of measurement to be used for the purpose of the calculation of charges to road users. Namely, that whenever distances travelled are used in the assessment of a charge to a road user, only standard metric units of measurement should be used.

www.ukma.org.uk

*Patrons: The Rt Hon the Lord Howe of Aberavon, Kt, CH, QC;
Ian Taylor MP; The Lord Taverne, QC; Dr Nick Palmer MP*



Road-pricing schemes – “per mile”

We note that pilot local road-pricing schemes are being proposed by the bill, with a view to a possible national road-pricing scheme at a later date.

Whilst no explicit mention is made of charging "per mile" in the draft bill itself, a related document, the "Road Pricing Framework Division - Demonstrations Project - Context and Statement of Requirements", does contain references to "cost per mile travelled" ...

<http://www.dft.gov.uk/pgr/roads/roadpricing/debate/systemsandtechnology/contextdocument>

This document contains the following references ...

- 3.5.3 "... the road-user who will be encouraged to verify overall mileage on statements. ..."
- 5.2 "Cost per mile travelled"

Legislation

We believe that the “Weights and Measures Act 1985” is relevant when it comes to road-pricing “per mile”.

Our interpretation is that the use of pricing “per mile” would fall within the definition of "use for trade" in section 7(1) of the Act, insofar as it would be "use in connection with a transaction falling within subsection (2) below where (a) the transaction is by reference to quantity ... and (b) the use is for the purpose of the determination or statement of that quantity."

Subsection (2) states that "A transaction falls within this subsection if it is a transaction for ... (b) the making of a payment in respect of any toll or duty."

Section 8 sets out the permissible units, and subsection (2) includes the exemptions in the Annex to the Units of Measurements Directive relating to the use of the ounce troy (for precious metals), the carat (metric) (for precious stones or pearls) and the pint (for draught beer or cider and milk in returnable containers). The mile is permitted only as a "supplementary unit" of length (see section 8(5A) and Part VI of Schedule 1).

We would conclude that UK law does not currently permit the use of the mile for "toll purposes”.



The case for charging “per kilometre” and not “per mile”

We acknowledge that the Department for Transport currently has no immediate plans to convert road signage (and new car odometers) to metric units, and that therefore it might at first sight seem obvious for road-pricing to be made on a “per mile” basis. However, we believe that this would be short-sighted and would lead to extra cost in the long term.

The likelihood remains that a future Government will bring the units of measurement used on the UK’s road signage into line with the majority of the rest of the world. When this happens, it is likely that all road-related measurement systems, such as those that could be used for road-pricing, will also be required to convert to metric units. It is for this reason that we propose that all road-charging infrastructure (electronic in-vehicle equipment, and pricing schemes) should use metric units from the outset of any new road-pricing scheme.

Road users will likely be required to fit an electronic device of some description to their vehicle for road-pricing schemes to operate. When charged on a per kilometre basis, there will be no problem for the road user to “verify overall mileage on statements”, if the in-vehicle device is required to log and display distances in the same (kilometre) units. Indeed, relying on a vehicle’s conventional odometer (miles or otherwise) will be inadequate because distances travelled on toll-free roads and private land will also be included in readings. A conventional odometer also lacks the facility to record separate journeys undertaken on roads that might be charged at different rates.

It is worth noting that distances travelled are already recorded exclusively in kilometres by digital tachographs in all UK road vehicles that are currently required to be fitted with them.

Conclusion

At this early stage in the development of road-pricing schemes, prior to the specification of in-vehicle equipment, we feel that it is prudent to consider the longer term benefits of choosing to charge “per kilometre” rather than “per mile”.

Recommendations

We recommend that any road-pricing scheme that uses distance travelled as a basis for the calculation of a charge to a road-user, should be made “per kilometre” and not “per mile”.

We recommend that any electronic device that is required to record distances travelled by a vehicle for the purpose of a road-pricing scheme should be required to record and display distances exclusively in kilometres.

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Ian Taylor MP; The Lord Taverne, QC; Dr Nick Palmer MP*



Background: Government policy on metrication

Government policy since 1965 has been to promote the use of the metric system (SI) for an increasing range of purposes. Indeed, as a result of the Units of Measurement Regulations 1986 (SI 1986, No. 1082) as amended, the metric system is now the primary system of units of measurement permitted to be used for most official and legal purposes in the UK (subject to certain derogations contained in Directive 89/617/EEC (as amended) regarding the temporary retention of imperial units for speed and distance on road signage).

The reasons for the Government's policy of promoting the metric system as the primary (and eventually the only) system of weights and measures have been set out repeatedly over many years in official reports and White Papers such as those listed in Appendix B. We will not rehearse these reasons here except to reiterate that a single system of measurement units is essential to clear communication, children's education, and safety on the roads. The continued retention of two incompatible systems of measurement is contrary to the national interest.

Finally

We would like to thank the Department for Transport for being given the opportunity to express our views in this consultation, and look forward to taking part in future consultations.

A copy of this letter has been e-mailed to you for your convenience.

Thank you for your kind attention.

Yours faithfully

Derek Pollard
Secretary UKMA

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Ian Taylor MP; The Lord Taverne, QC; Dr Nick Palmer MP*



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30 Aug 2007

Dear Sir/Madam,

DRAFT LOCAL TRANSPORT BILL – Public Consultation

UKTram Ltd comprises the Confederation of Passenger Transport (CPT), pteg (the PTE group), LRTF (the Light Rapid Transit Forum) and London Trams (part of TfL). We were formed in 2005 specifically to represent the UK tramway industry in its dealings with Government and other agencies, and to carry out research primarily into costing issues in the design, procurement and construction of tramway systems in the UK.

We very much share the Government's desire to empower local authorities to develop and implement appropriate solutions to their transport problems and believe that some changes to the current arrangements would be beneficial in achieving that objective. There is no doubt that the successful development of tram schemes in the UK requires an integrated approach to public transport, and we would therefore support the general direction of the draft Bill.

However, we are restricting our detailed comments to the governance and road pricing issues as the arrangements for local bus services and the role of the Traffic Commissioners are beyond the remit of UKTram.

Our responses to the questions posed at the end of Chapter 4 are as follows:

Q6. Whilst we would not presume to propose any particular solution, and believe that different arrangements might well be best for differing circumstances, we would agree that there appears to be scope to improve the co-ordination of public transport provision through reform of the governance arrangements in the metropolitan areas outside London.

Q7. Given the different sizes and geographical spread of our cities we would agree that a flexible approach is needed which would allow individual areas to adopt different arrangements.

Q8. In order to be consistent with the above approach, we would agree that the cities should be asked to bring forward their own proposals. We are not, however, qualified to comment on which existing bodies should be asked to take the lead on this.

Q9. No comment

Q10. No comment

Q11. We would agree with the proposal that PTAs should have regard to Government policies on climate change and that they should have the powers to participate in the development and implementation of local road pricing schemes.

Q12. We agree that it seems anomalous for local authorities to have to prepare both a Local Transport Plan and a Bus Strategy, and that what is really required is a properly integrated transport strategy covering an appropriate timespan. Tram schemes typically take 10 to 15 years from inception to full implementation in the UK (though often much less time abroad), and therefore your proposal that the Integrated Transport Strategy should cover the medium term of 10 to 15 years (with an implementation plan of 3 to 5 years) is very strongly supported.

Our responses to the questions on Chapter 5 are as follows :

Q13(a) We are very much aware of the controversial nature of congestion charging schemes, but we believe they will be (indeed often are already) needed in our major cities, and that they can be the source of major revenues which should be used to fund significant public transport improvements, such as tram schemes. We would therefore very much support the proposal to require local authorities to use their share of the net proceeds of road charging schemes to support local transport policies. We are concerned, however, that these revenue streams will not become available until the pricing schemes have been introduced, whilst the public expect alternative transport solutions to be available to them immediately the schemes commence – this raises the issue of how to fund major public transport improvements *ahead* of the introduction of these schemes, particularly when major infrastructure investment is needed. A mechanism for dealing with this issue would be a welcome addition to the Bill.

(b) We would support efforts to ensure consistency and inter-operability between charging schemes in so far as this will help to make the introduction of subsequent schemes more acceptable. However, there is a potential conflict between this requirement and locally appropriate solutions, and at the present our view would be that it is more important to implement a few

schemes and learn the lessons from these, than to worry overly about inter-scheme compatibility. After all, our major cities are some distance apart, and most residents will only be affected by one scheme on a regular basis. All schemes will, of course, have to cater for out-of-town visitors by some means.

I hope that these comments are useful and that the Government will be able to take them on board in its review of this consultation.

Yours sincerely,

P. G. Hewitt
Chair of UKTram Ltd



UNISON

*Response to the
Draft Local Transport Bill*

September 2007



Draft Local Transport Bill

UNISON response

7th September 2007

Introduction

UNISON welcome the opportunity to make this short submission to *strengthening local delivery: the draft Local Transport Bill*.

UNISON members work for a wide range of transport organisations, particularly Passenger Transport Executives, bus companies, British Waterways and regional airports. Their jobs include professional, managerial, administrative, clerical manual and engineering roles. In addition to negotiating pay, terms and conditions, UNISON works on different priority issues for each group of members, and contributes to relevant policy debates and consultations.

Overall we support the direction of travel signalled in the draft bill, which we see as broadly in line with what we believe to be the key objectives of local transport policy:

- a transport network that supports economic, environmental and social sustainability
- accountability of services to the communities that they serve

We also believe that the draft bill is very timely. Along with the forthcoming legislation on climate change, the local transport bill should provide a major component of the policy framework needed to set us on course towards lower emissions across the transport sector.

The points set out below represent our preliminary response to the central components of the draft bill.

1 Road pricing

1.1 We support the principle of road pricing as a way of reducing congestion and promoting more environmentally sound modes of transport, as long as funds generated are used to improve local transport services.

1.2 We also believe that if such schemes are to enjoy public support, and be seen to be fair, they must not penalise essential users and low paid workers. Transport authorities must, if they are to include road pricing as part of their integrated transport strategy, set out practical and affordable alternatives to car use and ensure they will be implemented before the road pricing scheme's introduction.

2 Better bus services

2.1 UNISON believes that quality contracts have a significant role to play in improving local bus services. However, we do note the arguments that have been put forward by pteg, questioning whether the procedures for the approval of quality contract schemes are fit for purpose. We agree with their analysis that a multi stage process will potentially deter PTEs / PTAs from introducing such schemes, and the role proposed for the centralised Transport Tribunal and approvals boards cut against the grain of local decision making.

- 2.2 We also note that there is no mention within the consultation of employment issues. Whilst it is not unusual for a consultation on a draft bill to not cover employment issues, the proposals clearly do have significant implications for staff. On this basis we believe there is a need for government to confirm its commitment to TUPE regulations in respect of bus company staff being transferred to another operator under franchising. The government should also demonstrate that its support for a greater role for community transport and taxi buses is not designed to procure services on the cheap.
- 3 Reforming local transport governance
- 3.1 We recognise that effective local transport governance is a pre-requisite of the planning and delivery of effective local transport strategies. To such ends the scope within the proposals for cities and potentially other areas to be required to carry out reviews to determine whether or not current arrangements are fit for purpose is an appropriate first step. However the lack of a clear view on who should carry out the reviews in cities is disconcerting, particularly in light of the Treasury Sub National Economic Development and Regeneration Review, the conclusions of which are likely to have significant bearing on the reviews.
- 3.2 For our part, we believe that all stakeholders should take part in local reviews, and that any such processes that are put in place are conducted in an open and accountable way.
- 3.3 It is not helpful to omit discussions of funding mechanisms from the consultation. Indeed, one of the weaknesses of what should be another transport success story for the government, the concessionary fares scheme, has been the failure to resolve issues around funding. The government needs to make sure that it does not repeat this mistake. As pteg have argued, questions relating to governance and statutory functions have both an impact and a dependence on funding. It will be incredibly hard to develop firm proposals for future governance arrangements against a backdrop of financial uncertainty.
- 3.4 We note the proposal for PTAs and local authorities to develop integrated transport strategies and delivery plans. Clearly the guidelines for the development of such plans should specify the need for places of work, public services and amenities to be accessible via public transport.
- 3.5 Again we note the implications of the provisions within the bill for staff who currently work within PTEs and Metropolitan District Councils, particularly where reviews lead to the reconfiguration of boundaries. As UNISON has a significant number of members in PTEs and MDCs we would like to register our strong interest in future constructive involvement in the framing of the employment related elements of this section of the bill.

Further Details available from
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