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# Report to the Secretary of State for Transport

by S Dean MA MRTPI

an Inspector appointed by the Secretary of State for Transport

Date: 5 November 2024

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## TAMAR BRIDGE ACTS 1957, 1979 & 1998

## TRANSPORT CHARGES &c (MISCELLANEOUS PROVISIONS) ACT 1954

### PROPOSED REVISION OF TOLLS

AT

### TAMAR BRIDGE & TORPOINT FERRY

**File Ref: DPI/N1160/24/12**

Inquiry sat 15 October 2024

Sites visited on 14, 15, 16 October 2024

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## CASE DETAILS

- The application is made by the Tamar Bridge and Torpoint Ferry Joint Authorities, under Section 6 of the Transport Charges &c. (Miscellaneous Provisions) Act 1954 (as amended) and the Tamar Bridge Acts 1957, 1979 and 1998.
- The effect of the application if approved would be to increase toll charges for use of the Tamar Bridge and the Torpoint Ferry by 15.4%.

### Summary of Recommendation:

- **That the Order should be made in accordance with the application.**

## PREAMBLE

1. On 2 May 2024 Cornwall Council and Plymouth City Council (the Joint Authorities) applied to the Secretary of State for Transport for a revision in toll charges for use of the Tamar Bridge (the bridge) and the Torpoint Ferry (the ferry, together, the crossings). The application is made under the provisions of the Transport Charges &c. (Miscellaneous Provisions) Act 1954 (the 1954 Act) under powers derived from the Tamar Bridge Acts 1957 to 1998.
2. I held a public local inquiry into the application at The Copthorne Hotel, Armada Way, Plymouth on Tuesday 15 October 2024.
3. The statutory formalities under the 1954 Act have been observed. Some 413 written objections to the application have been received by the Joint Authorities, all but one of which remain outstanding. Interested parties who attended the inquiry were given an opportunity to ask questions of the applicant's witnesses, a number of them also submitted proofs of evidence and some made statements in opposition to the application. Before the inquiry opened, I visited the Tamar Bridge including the visitor centre. After the inquiry closed, I visited the Torpoint Ferry and the adjoining areas, including Saltash and Torpoint.
4. In this report I set out summaries of the cases for and against the application together with my conclusions and recommendation.
5. Section 43(2) of the Tamar Bridge Act 1957 and section 13 of the Tamar Bridge Act 1979 state that, for the purposes of considering an application to revise tolls or charges "the bridge and the ferry shall be regarded as one undertaking."
6. Section 6(3) of the 1954 Act states that in reaching a decision on the application, the decision-maker shall have regard to:

*...the financial position and future prospects of the undertaking and shall not make any revision of charges which in his opinion would be likely to result in the undertaking receiving an annual revenue either substantially less or substantially more than adequate to meet such expenditure on the working, management and maintenance of the undertaking and such other costs, charges and expenses of the undertaking as are properly chargeable to revenue, including reasonable contributions to any reserve, contingency or other fund...*

**CASE FOR THE JOINT COMMITTEE***Background*

7. The Tamar Bridge and Torpoint Ferry are operated as a self-financing joint undertaking in accordance with the Tamar Bridge Acts. The bridge and ferry are managed by the Tamar Bridge and Torpoint Ferry Joint Committee (the JC) made up of elected members from both Cornwall Council and Plymouth City Council (the parent authorities). The JC's aim is to provide the travelling public with safe, reliable and efficient crossings of the Tamar through the operation, maintenance and improvement of the crossings.
8. Tolls are charged on the crossings in one direction only, when travelling from Cornwall to Devon, that is, into Plymouth. There is no charge for pedestrians, cyclists and motorcycles using the bridge, but there is a small charge for motorcycles using the ferry. Buses providing staged public transport services are not charged. Charges for abnormal loads apply in both directions. The ferry services operate 24 hours per day on 365 days per year.
9. A discount scheme, the Tamar Tag (TT) is offered for regular users which provides 50% discount subject to payment of a monthly administrative charge and the maintenance of a positive account balance. The current toll for a car is £2.60 and this would increase to £3.00. Using the TT, the relevant increase would be from £1.30 to £1.50. All other toll classes would increase by the same percentage and there is no proposal to change the classification of vehicle types.
10. The Tamar Bridge is a conventional suspension bridge and was constructed in 1961, at the time being the longest suspension bridge in the UK. Major improvements to the bridge were undertaken between 1998 and 2001 which included widening the bridge to accommodate two additional lanes, one for local traffic and one for pedestrians and cycles.
11. Ferry services between Plymouth and Torpoint have been in operation since 1791. The ferry has been owned by Cornwall Council since 1922 and its operation became linked to that of the bridge under the Tamar Bridge Acts. Ferry services are provided using three ferries on a 24/7 basis, with frequency managed to reflect demand and in response to maintenance or operational factors.
12. Day to day operation of the crossings, including corporate costs and financing costs is funded by income which is almost completely derived from toll income, pre-payment account fees and penalty charges<sup>1</sup>. To finance major works, the JC borrows from the parent authorities. Interest is currently set at the Public Works Loan Board 50-year annuity rate plus 40 basis points as at March 31, on a reducing balance basis.<sup>2</sup> The JC itself cannot borrow money.<sup>3</sup>
13. The JC uses a financial model to predict income from tolls and necessary expenditure up to 15 years into the future. Previously, a prudential reserve of £2 million was maintained, but that level was set over ten years ago, and is now considered insufficient. As such, the JC now considers that £3m is a more appropriate minimum prudential reserve. The reserve is necessary for urgent

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<sup>1</sup> Proof of Evidence of David List and in oral evidence

<sup>2</sup> Proof of Evidence of Geraldine Baker

<sup>3</sup> Proof of Evidence of Geraldine Baker and in oral evidence

works which may be required and for immediate access to finance. The reserve also plays an important role in managing the crossings' cashflow.<sup>4</sup>

14. Budgets, future spending, plans and projects are scrutinised by full Council meetings of the parent authorities and meetings are held in public, with papers likewise largely made public.

*The Bridge*<sup>5</sup>

15. Since opening in 1961 the bridge has been maintained to the necessary contemporary statutory and industry best practice standards.
16. The bridge is maintained in accordance with three overarching principles reflecting the up-to-date standard approach for UK highway structure maintenance, which seek to i) detect in good time any defect that may cause an unacceptable safety or serviceability risk or a serious maintenance requirement in order to safeguard the public, the structure and the environment and to enable remedial action to be taken, ii) provide information that enables the management and maintenance of a stock of structures to be planned on a rational basis in a systematic manner, in order to support the achievement of the objectives of the Overseeing Organisation, and iii) ensure that inspections are undertaken by suitably experienced and competent staff.
17. Historically the bridge has been inspected around a 6-year principal inspection cycle, and this cycle has continued with a riskbased-, rolling programme of inspections.
18. Costed in 2019, this programme has an average annual cost of £100,000 for structural and special inspections, and this figure is still considered to be reasonable, subject to an adjustment for inflation.<sup>6</sup> Routine safety inspections and walkthrough inspections, as well as electrical, drainage and dehumidification inspections are also scheduled. Combined with supplementary labour to assist with inspections, the total annual cost in 2019 for all inspections was approximately £250,000. This figure is still considered to be reasonable, subject to an adjustment for inflation. The increasing age of the bridge and its systems is likely to lead to an increase in the inspection costs over time.
19. Inspections provide the raw information on which maintenance decisions and recommendations are based, and the information they gather is combined with considerations of safety, disruption and budget to make decisions on maintenance. In common with other bridge owners and maintaining authorities, since 2010 the bridge has been moved away from reactive maintenance towards riskbased- planned maintenance. This approach is now well-established, and it is considered that this will lead to higher structural and safety reliability as well as more predictable maintenance budgets. The relevance of this is likely to grow as the bridge ages.
20. The budget for routine maintenance, which includes works such as cleaning, painting, minor repairs, "securing and tightening" operations, was £650,000 per annum in 2019, and this is still considered to be reasonable subject to an adjustment for inflation. There is an expectation that this budget will increase

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<sup>4</sup> Geraldine Baker in oral evidence

<sup>5</sup> Broadly Document 1, Proof of Evidence of Stephen Baron and in oral evidence

<sup>6</sup> Proof of Evidence of Stephen Baron and in oral evidence

with the increasing age of the structure, but the requirements for maintenance of this type are well understood given the history of bridge maintenance.

21. Specific maintenance schemes are planned over a five-year timescale, and at this time the current programme includes the remainder of the bridge access (for maintenance and inspection) improvement works, main cable remediation works, retentions for the 2021 resurfacing works, rocker/pendle remedial works, supplementary cable remedial works, and other minor works. There is an indicative future programme which deals with structural fire protection investigation, resurfacing and coatings as longer-term (post 2028) budget provisions. Significant longer-term projects, including access gantry, cablehanger- and parapet replacements are also anticipated, and budgeting for them is prudent, although costcertainty- is necessarily lower given they would likely take place beyond the five-year timeframe of the current financial model.
22. Given both the age of the bridge, experience of maintenance of it and lessonslearned from other similar structures worldwide, it is also considered important to ensure a robust contingency fund is -maintained to ensure safety and the minimisation of disruption.
23. In review of the total budgetary provisions for inspections and maintenance of the structure, items that exceeded the likely scope required following technical recommendations were not found.
24. The core issue for the future is continuing to deliver a safe, reliable and efficient service that is able to cope with demand and meet user expectations. In addition to routine maintenance and inspections there will also be cyclical and ad hoc projects in the future. Specific significant activities and projects at the bridge scheduled over the next four years include supplementary cable works, the next phase of repainting, toll booth refurbishment and fire protection and open road tolling. The longer-term capital programme over the next 20 years includes a full bridge repainting programme and resurfacing.

#### *The Ferries*<sup>7</sup>

25. There are three chain ferries which provide a service 24 hours a day, 365 days of the year, providing an essential link between south-east Cornwall and facilities and services in Plymouth and beyond. The current ferries were introduced in 2004/05, replacing ferries that were then over 40 years old and are currently considered mid-life. The vessels are maintained in accordance with Lloyds Classification requirements and are certified by the Maritime and Coastguard Agency. The ferry crossing is the busiest estuarial ferry crossing in the UK, with 2 million vehicle crossings and 0.5 million pedestrian crossings per annum. The number of ferries running at any time varies depending on traffic demand, and the ferries undertake between 1290 and 1320 crossings per week.
26. The engineering support model for the ferry service is typical of that utilised throughout the marine industry. Routine maintenance and defect rectification of the ferries and their facilities infrastructure is undertaken using a computerised maintenance management system, which includes a planned maintenance system. This work is generally carried out by the in-house team of qualified and experienced technicians. Some equipment and systems servicing and repair is undertaken by their manufacturers. The vessels are dry-docked and re-fitted every 5 years when they are also subject to Bottom and Special Surveys to

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<sup>7</sup> Broadly Document 1, Proof of Evidence of Simon Potter and in oral evidence

meet the requirements of keeping the vessels 'in Class' with the Lloyds Register. Other surveys are undertaken when the vessels are afloat. The surveys cover the vessels, machinery, engine emissions, fire-fighting systems, and life-saving equipment. This ensures that the ferries are materially sound and are being operated safely.

27. There is no statutory requirement for the ferries to be 'in Class', but the Maritime and Coastguard Agency's Code of Practice<sup>8</sup> is adopted by ferry operators across the UK on a voluntary basis. The JC considers that maintaining the ferries in this way and to these standards gives a third-party assessment and assurance that the ferries are sound and are operated safely.
28. The strategic goal for the management and maintenance of the ferries is that the assets achieve the maximum lifespan and continue to provide an appropriate service to contemporary standards and expectations. As such, a conservative approach is taken to maintenance given the impact of servicedisruption, and major projects are structured to minimise impact on users whilst maintaining- value for money and upholding safety standards.
29. There are a range of servicing and inspection requirements for the ferries, both statutory and nonstatutory-, with various timescales, from continuous monitoring to fiveyearly- surveys. Given the age of the ferries, whilst they are structurally sound, equipment on and in them does require monitoring, management, maintenance and replacement.
30. Maintenance is planned for using different periods, depending on the equipment concerned; being defined by calendar, utilisation or condition. In-house staff undertake planned preventative maintenance effectively and efficiently and have a mature organisational structure. Current service reliability is around 99% in relation to the JC's key-performance indicators.
31. Preventative maintenance includes engine overhauls, chain maintenance and replacement. There is an ongoing programme of modifications to improve safety, efficiency and operability. Upgrades are also programmed to both the ferries and their supporting infrastructure to improve resilience, operability, reliability and ensure ongoing compliance. Despite this, reactive maintenance and repairs are occasionally required.
32. Each ferry is required to be placed in a dry-dock every five years to complete the scheduled survey and refit regime. Whilst there are three suitable locations on the UK south coast, only one of those facilities tendered for the recent refits in response to an open tender procurement exercise. That tender was subject to extensive scrutiny and a contract was awarded, but the JC recognise that there are inherent value for money challenges in the lack of competition.<sup>9</sup>
33. The process that Tamar Crossings use to produce the refit specification has been reviewed and found to be thorough and appropriate. The process involved review of the previous refit specification with the addition of any lessons identified, as well as inclusion of work arising from known issues and defects on each particular ferry at the time of compiling the specification.
34. Potential obsolescence issues have been addressed at refit with the replacement of older equipment and systems that cannot be completed with the facilities at

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<sup>8</sup> Proof of Evidence of Simon Potter and in oral evidence

<sup>9</sup> Proof of Evidence of Simon Potter and in oral evidence

Torpoint. The mid-life refit work packages carried out in the previous refit cycle were significantly greater than any previously undertaken for the fleet. For current and subsequent refit cycles the overriding requirement when making decisions on what to include in the refit work package remains to provide a fleet of vessels that will be in the material state required to operate the service effectively and safely, and to build in resilience of the service for the next five years until the next round of refits.

35. The Tamar 2050 strategy<sup>10</sup> includes a commitment to reduce carbon emissions by 2030, and as part of this, a project to look at the feasibility of decarbonising the existing ferries was carried out. Although such a programme is non-statutory, it reflects the ambitions of the parent authorities,<sup>11</sup> and it appears that there is opportunity to reduce current ferry energy demands and emissions ahead of replacement. Such efficiencies would also have running cost benefits. The JC is also conscious of wider environmental issues around the operation of the ferries.
36. The three ferries are currently 20 years into their service lives, and the current spending forecast shows a mix of standard revenue expenditure on maintenance and fuel, currently planned capital expenditure around refits, chain upgrades, chain tower and anchor point replacements. Future, longer-term capital expenditure is around the carbon neutral ambitions and replacement ferries. Spending forecasts are based on business as usual in terms of traffic level and costs.
37. The ferries are maintained to the necessary standards to ensure they remain reliable, resilient, sound and safe, satisfying the requirements of the Lloyds Register and Maritime and Coastguard Agency, as well as upholding the values and ambitions of the JC and its parent authorities. The level of technical expertise and experience is appropriate for the provision of engineering support to a service such as this, and the management of that support is effective. Overall, the engineering support management conforms to good industry practice and expenditure to date and forecast expenditure is considered fair and reasonable.
38. The core issue for the future of the ferry is continuing to deliver a safe, reliable and efficient service that is able to cope with demand and meet user expectations. In addition to routine maintenance and inspections there will also be cyclical and ad hoc projects in the future. Specific significant activities and projects scheduled over the coming years include refits for each vessel every five years to stay 'in Class' and meet the requirements of the Maritime and Coastguard Agency, chain gantry replacement, ferry decarbonisation, upgrade of the ferry marshalling areas and in due course, replacement of the vessels, which is likely to be around 2035.

*The Offices, Control Centre and Visitor Centre*

39. The office and control centre houses IT systems necessary for toll collection and to control bridge operations. In addition, the JC controls lane usage through the Saltash tunnel on the A38 on behalf of National Highways. The central lane on the bridge is managed to allow for tidal flows of traffic at peak times. The

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<sup>10</sup> Document 1.8

<sup>11</sup> Proofs of evidence of Simon Potter and David List and in oral evidence of both



office/control centre also provides a customer services facility and a visitor and learning centre.

40. The original control building dated from the time of the bridge construction and was outdated and not fit for purpose, particularly in terms of housing modern IT systems, health and safety. A new control centre building was constructed, replacing the previous building, and a visitor/learning centre has been added above part of the original building.

*Reasons for the application<sup>12</sup>*

41. The financial position of the JC is monitored on a continuous basis, including income and expenditure forecasting and reporting on the financial position. A regularly reviewed contemporary financial model, looking as far forwards as 2050 is maintained, and used as a tool to monitor and forecast financial sustainability.
42. At the time of the previous toll revision application in April 2022, reserves were already depleting (as a result of expenditure exceeding income) and the TT discount was reduced for a short time in order to generate additional income. At the time of that application, the model predicted that the next toll increase would not be needed until 2034/35.
43. However, since then, a number of the key assumptions which underpin the model have proved incorrect, or otherwise atypically unreliable for various geopolitical, economic- and business reasons. Those assumptions were the level of cost inflation in the short and -longterm, anticipated- salary increases, and most importantly, that traffic levels would increase to 90% of pre-Covid levels in 2022 and then 100% of pre-Covid levels by 2025.
44. The war in Ukraine triggered very high cost-inflation, notably in energy prices, as well as in goods and services more generally. Local government pay awards have been higher than anticipated (staff are local government staff). Overall there have been significant increases in virtually every element of the costs associated with operating, maintaining and improving the crossings.
45. In terms of traffic levels, historically (with data back to the 1980s<sup>13</sup>) these have been reasonably predictable, giving a strong and stable base for the model and for forecasting. There is now no evidence to reliably support an increase of traffic back to 90% or 100% of pre-Covid levels as previously modelled. This is attributed to longterm shifts in user travel behaviour, including the increase in -work-fromhome and -onlineshopping-, as well as the general downturn in the national economy.
46. The difference between the forecast traffic levels and income for 2022 and the current forecast represents a reduction in £1.6m of annual anticipated income. As noted above, the financial model is continuously updated and by the beginning of 2023 there was already a developing risk that the JC would be operating in deficit from the 2023/24 financial year, depleting the prudential reserve.
47. Alongside modelling and management work, the parent authorities commissioned Local Partnerships to undertake an independent review of the

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<sup>12</sup> Broadly Document 1, Document 2 and oral evidence

<sup>13</sup> Document 1.5

crossings. That review<sup>14</sup> covered a number of issues, but focussed on the efficiency and effectiveness of the current operating model, an alternative approach to toll increases and the longterm- financial future of the crossings. It found that the organisation is fit for purpose but supported the need to re-baseline toll levels and pursue indexation of tolls to ensure a sustainable financial future. Based on the report's findings and recommendations a sub-group has been established to develop a forward strategy, and the Tamar 2050 Programme was established.

48. That programme<sup>15</sup> is a series of nine longterm- priority areas around transformation and modernisation, including a transformational and efficient operation, optimising income, growing and investing in local talent and celebrating Science, Technology, Engineering, Mathematics and Medicine, technology to improve effective toll operation, political, business and local engagement – improving our connections with stakeholders, keeping toll prices low and providing toll price certainty free-flow tolling, carbon neutral ferry operations and improved Tamar connectivity and access.
49. Financial sustainability is essential for the longterm resilient delivery of safe, reliable- and efficient crossings. The financial model without this toll revision<sup>16</sup> shows that by the end of the financial year 2025/26 the JC would be operating at a deficit, with the reserves becoming unacceptably low by the end of the financial year 2024/25.
50. 93% of income is from tolls, account fees and penalty charges, with the remainder made up of a National Highways re-charge for Saltash Tunnel operation, wayleaves payments, advertising on the ferries, landlease income, a coffee concession- and charges for tours. Further commercial opportunities are being investigated, but there are none which are anticipated to fundamentally alter the financial position.<sup>17</sup>
51. Income forecasting has historically been a lowrisk- part of the financial model owing to stable and predictable traffic levels. However, the Covid pandemic and long term shifts in crossing usage have reduced traffic levels, and these have been stable at a lower level than previously for at least 17 months. There is now no indication that traffic levels will return to previous levels, so the model now incorporates static traffic levels (and associated toll income).
52. In 2023, finance workshops were held in which Officers and Members of the JC reviewed the financial position of the JC and considered available options. These workshops included detailed, line-by-line- reviews of expenditure and options for cost reduction, including consideration of service provision and associated effects. The workshops provided a clear consensus from Members that current service levels should be maintained and that there should be no compromise in maintenance standards or resilience.
53. Both the ferry and the bridge are mid-life, and as an assetheavy operation, the JC invests significantly in essential capital projects to optimise the life of the assets, ensuring long term service delivery. Generally large capital projects are funded by borrowing over 25 -years.<sup>18</sup> In recent years, £20m has been spent on

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<sup>14</sup> Document 1.7

<sup>15</sup> Document 1.8

<sup>16</sup> Document 1.9 and 1.10

<sup>17</sup> Oral evidence of David List and Geraldine Baker

<sup>18</sup> Proofs of Evidence of David List and Geraldine Baker and in oral evidence of both

capital projects, and following the workshops and reviews, approximately £16m of essential future investment and capital expenditure has been identified for the next four years.

54. These include bridge supplementary cable works, the next phase of the bridge protective coating project, toll-booth replacement, ferry office and workshop refurbishment, chain gantry replacement, ferry refits and work towards ferry decarbonisation. Detailed technical evidence on all of this work has been provided with the application.<sup>19</sup>
55. The financial model also monitors the level of reserves, with the prudential minimum now set at £3m. At the time of the application, the reserves were at £0.506m, and without any intervention, these would quickly fall.
56. For the current financial year, expenditure is forecast to be £18.7m. Income from all sources is forecast to be £17.5m. Leaving a shortfall of £1.2m. At present, operating at current toll levels beyond November 2024, leads to a further loss of projected income of £200,000 per month,<sup>20</sup> negatively impacting the forecast reserve levels. Given the work which has already been undertaken on cost management and spending delays, this can only be resolved through additional income if aspirations to maintain current service levels are to be met.
57. The approved toll increase would generate only modest reserves and on current forecasts, a further toll increase would be required by 2033.
58. It is considered that the proposed toll increase is essential to meet forecast expenditure. The JC recognises that toll increases are unwelcome, but unforeseen changes to income and costs driven by external factors are a reality that must be addressed in order to continue to deliver safe, reliable and efficient crossings.
59. If the proposed toll revision is not authorised, current service levels would need to be reviewed with reduction a likely outcome, and essential asset maintenance might have to be compromised thereby threatening asset life and the long-term viability of service delivery.

## **CASES OF THE OBJECTORS**

60. 412 objections to the application remain, with the objectors listed in Appendix 4. The broad themes of those objections, including comments made at the inquiry are set out below. The cases made by those objectors who submitted proofs of evidence and made statements to the inquiry (see Appearances at the end of the report) are set out separately below.

### *Management of the crossings*

61. The crossings are poorly and inefficiently managed, with excessive expenditure on staff, operations, and equipment. Traffic has dropped, but revenue has increased, spending is out of control, and there has been an increase in borrowing which was historically (pre-2000) never done.

### *Maintenance and future work programmes*

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<sup>19</sup> Proofs of Evidence of David List, Stephen Baron and Simon Potter and in oral evidence of all three

<sup>20</sup> Proof of Evidence of Geraldine Baker, and David List and Geraldine Baker in oral evidence

62. Maintenance is excessive and future work programmes are unnecessary, over the top and too costly.

*Visitor centre/offices/refurbishment*

63. The new visitor centre, offices and control buildings were unnecessary, expensive and do not contribute to the core function of delivering safe, reliable and efficient crossings.

*Ferry decarbonisation*

64. This is not required by legislation and is an unnecessary expense for current crossing users and does not contribute to the core function of delivering safe, reliable and efficient crossings.

*Bridge fire protection*

65. This is not required by legislation and is an unnecessary expense for current crossing users and does not contribute to the core function of delivering safe, reliable and efficient crossings.

*Open road tolls*

66. The current toll taking methods are out of date, inefficient, slow and archaic. Open road (or free-flowing) tolling would save time, reduce congestion, reduce pollution and save significantly on staffing costs.

*Toll booth refurbishment*

67. The toll booth refurbishment is unnecessary, expensive and does not contribute to the core function of delivering safe, reliable and efficient crossings.

*Costs*

68. The toll is too expensive already and will be too expensive with this increase. Particularly given current cost of living pressures and local wages.

*Effect on the local economy*

69. South-east Cornwall is already economically disadvantaged, and increases to the toll will worsen this situation, discouraging investment, discouraging travel and harming those whose incomes are already well below the national average. Businesses are considering relocating to avoid the crossings, and the toll charges are a factor when considering where to locate new businesses.

*A tax on access to facilities and services*

70. Residents of south-east Cornwall rely on the crossings to access education, health, employment, leisure and other facilities and services. The increased toll is an unfair tax on local residents, and already has a chilling effect on employment opportunities if a crossing is involved.

*Local discounts should apply*

71. There should be a local discount scheme, similar to that provided at other tolled crossings around the country. In addition, visitors and tourists should pay more.

*Staff are overpaid*

72. Staff costs and wages are excessive. Pay rises have been excessive.

*Poor comparison to other crossings (tolled and otherwise)*

73. The toll compares poorly to other tolled crossings around the country on a permile- basis.

*Inappropriate cross-subsidy*

74. The ferry costs significantly more to run than the bridge, but only brings in an eighth of the income, meaning that bridge users are unfairly subsidising the ferry.

*The bridge has been paid for*

75. Income from the tolls has exceeded the cost of building the bridge many times over, and it was widely understood that tolls would end when this happened.

*The crossings should be centrally funded*

76. Central government should be funding the bridge if not the bridge and the ferry. The bridge is a key part of the A38, which is otherwise maintained by National Highways. It is unfair for local residents to pay for a strategic, national transport link. Other previously tolled crossings have had their tolls removed, and others offer more generous, likely lossleading local resident discounts-.

*Consultation*

77. Consultation on the proposed toll increase was insufficient. The decision-making process by the JC and the parent authorities is opaque.

*Lack of engagement with central government*

78. The JC has not fully and properly engaged with central government to seek alternative sources of funding.

*Application is premature*

79. The application has been made too soon, given requests for central government funding, the upcoming budget, talks about devolution, political aims to reduce car travel, and the potential for traffic levels to return.

**The Case of the Tamar Toll Action Group (OBJ 46)**

80. This application represents a 100% uplift in tolls over the last four years. To grant it would absolve the JC and its parent authorities of their responsibility and obligation to develop and operate an economically viable and sustainable business model for the crossings. The burden of excessive spending and borrowing instead falling on local residents at a time of financial strife.

81. The crossings are a key link for people on both sides of the river, but those in Cornwall are particularly reliant on Plymouth for employment, healthcare, retail, education and leisure. This 'Tamar Toll Tax' falls on residents and businesses alike and causes additional challenges with recruitment and retention for employers on both sides. This is exacerbated by the centralisation of NHS treatment facilities and services.

82. The cost increase would be cumulative and damaging. It is not appropriate to assess the toll cost in isolation, as that is not reflective of the frequency with which people need to use the crossings. In particular, the example given of a commuter, crossing five days a week is inappropriate and not reflective of the -day-today- reality of many users, particularly in south-east Cornwall.
83. The JC refers to the 'user pays' principle, which does not find expression in the Tamar Bridge Acts, which only state that tolls "may" be taken, rather than must. In addition, whilst the 'user pays' principle may be appropriate where there is a choice (such as at the M6 Toll), here the crossings are the only realistic routes.
84. The tolls have already, and will with this application, increase at a far greater rate than national average wages. This is even worse in Cornwall and Plymouth where the average wage is below the national average. Wage rises, and the ability of people to pay the toll have not kept pace with toll increases. The toll, and any increase have effects beyond the toll booth. They affect the costs that businesses must charge their customers, have an effect in terms of non-productive time paying for tolls and delay deliveries.
85. The costs, and effects of toll increases fall disproportionately on residents of south-east Cornwall, with residents of PL12/Saltash alone paying more in toll charges than the whole of the city of Plymouth. The toll increase will be felt much more negatively and have a far greater impact in south-east Cornwall than elsewhere. That area is reliant on the crossings and has no practical choice but to use them.
86. There have been no formal studies of the effect of the toll, and this proposed increase on the local economy, or indeed, of the effects of the congestion caused by the methods of toll collection.
87. No financial support has been provided by the government, in contrast to the precedents set at the Dartford and Mersey crossings, which have more favourable local residents' discounts, to the Humber Bridge, whose debt was settled by the government in 2011 to prevent a toll increase there, and Transport for London funding.
88. The TT scheme is not properly a local discount scheme. It is available to all users. If it were restricted locally, then finances may be improved, but instead, the use of the discount has been allowed to proliferate without restriction. The Mersey and Dartford crossings have much more generous schemes where residents in a fixed area qualify for certain discount or prepayment schemes. In addition, the evidence around the costs of the TT scheme is disingenuous, as minimum account thresholds are levied on a per-vehicle basis, so for households, or businesses with multiple vehicles, the minimum top up levels are much higher.
89. The bridge is the most expensive per-mile toll bridge to use in England. The Humber, Dart and Mersey crossings are all significantly larger and more complex. In addition, none of those crossings are between two areas where one is so reliant on the other for many critical services, giving rise to the almost total dependency on a tolled crossing for access to employment, leisure, retail and health facilities.
90. Consultation between the JC and stakeholders, including the Tamar Toll Action Group has been much more limited than the application suggests, and in any case, the JC does not take seriously the suggestions of the Group.

91. The JC alleges that it is the failure of traffic levels to recover to pre-Covid levels which is the single biggest factor leading to this toll revision application. However, traffic levels were already falling before the pandemic. Moreover, since 2017/18, traffic levels have fallen by 9% whilst revenue has increased by 58%, and still a financial shortfall is arising. Traffic levels have recovered at other tolled crossings in England. This points towards unnecessary spending, borrowing and inefficient management.
92. Notably, whilst the visitor centre allegedly brings a social value of £3 for every £1 spent on it, social value is not the same as funding, and it should not be for the tollpayer- to fund the salaries, benefits and running costs of the centre, when the JC cannot manage the actual essential costs associated with the operation and maintenance of the crossings themselves. The JC does not appear to have sought savings or cost efficiencies, but has instead, simply sought to reach deeper into the public purse.
93. The evidence of the JC does not support their claim that the reduction in income is because of the pandemic, instead, traffic has fallen, income has risen, yet the financial position has worsened. The financial position is not likely to be resolved by toll increases.
94. At least £8m of savings could be realised through the cancellation of the toll booth replacement, closure of the learning centre, cancellation of the ferry decarbonisation study and cancellation of bridge fire protection works, none of which are necessary or required by legislation. The visitor centre in particular is a cost drain on revenue.
95. Further savings could be realised by paring back the maintenance regimes of the ferries and/or carrying out those works in a more efficient and costeffective- manner, which could still meet the requirements.
96. Overall, poor cost control and failure to manage budgets for large and small items, costs and projects are common features of inefficient management, resulting in increased costs to users. Costs and expenditure associated with non-core (i.e. not directly connected to the provision of a safe, effective and efficient service) activities are not good value for money. The reliance on borrowing is excessive and unnecessary.
97. In addition, support for the toll increase application in Cornwall Council was extremely limited, with the vote to increase the toll only passing by two votes.
98. In conclusion, although the Group recognises the challenges of maintaining and operating these large pieces of infrastructure, the application should be refused.
99. Tamar Crossings should be instructed to make budget savings, just as people, businesses and government bodies (both local and national) have had to in recent years; the parent authorities should commission a cost impact study covering the regions affected by the toll, and the Secretary of State should commission a working group (as was planned with the previous government prior to the election) to discuss with affected user groups the way forward for funding support from National Highways for the crossings.

### **The Case of the Road Haulage Association (OBJ 393)**

100. Costs for the haulage industry have risen across the country over recent years, and an increase in tolls would increase the burden on this important sector of the economy. The proposed increase exacerbates cost pressures on businesses

in the southwest, both in terms of direct costs for those using the crossings, and indirect costs which would be passed on to their customers.

101. The viability of many businesses in the haulage and freight sector is directly connected to the accessibility and affordability of strategic road connections such as this one. The use of the crossings for businesses in the area is unavoidable and undermines their competitiveness and viability.
102. Haulage businesses are typically very 'lean', with profit margins around 2% and an increase in the tolls, when other costs, such as fuel have also risen, but freight volumes have dropped is weakening the industry and damaging members. Costs incurred whilst waiting to pay tolls add to the overall burden of the tolls on this crossing. Overall, members consider that the current tolls are already unsustainable, so are looking to remove them from their business, either by relocating or by not serving certain areas.
103. The tolls should not be increased, to protect everyone from the cost pressure associated with them, there should be better collaboration between the JC and stakeholders, and alternative sources of funding should be sought.

#### **The Case of Anna Gelderd MP for south-east Cornwall (OBJ 413)**

104. The crossings are essential infrastructure for the region, connecting Cornwall to the rest of the UK and providing a crucial link for communities, families and businesses.
105. The current toll structure and geography of the area presents a significant challenge for Cornwall residents in particular, who are reliant on the crossings for work, education and healthcare and who shoulder the greatest proportion of the toll cost.
106. A survey of local residents and businesses of the impact and burden of the current and proposed tolls shows a strong sense of dissatisfaction and frustration, as well as a feeling of being disproportionately impacted by the tolls. Residents find the tolls a particular burden and they place a strain on already stretched budgets, particularly in Cornwall where median incomes are already 20% lower than the national average. The economic and social effect of the toll increase on residents and businesses should be carefully considered.
107. Infrastructure must serve the needs of all residents, not just those who can afford it. The crossings are not just crossings, but essential lifelines for south-east Cornwall.

#### **The Case of Cllr Martin (OBJ 389)**

108. The application for a toll revision is premature pending the new Transport Secretary considering central government funding for the crossings. Such funding would eliminate the costs associated with collecting and administering the tolls and reduce congestion. That would also boost the local economy and improve emissions. Other sources of funding should be fully investigated before any toll increase is allowed. Devolution, debt writeoffs- or National Highways funding could lead to the abolition of tolls.
109. The toll booth replacement, bridge fire protection and ferry decarbonisation are unnecessary expenditure, and the ferry maintenance and replacement schedules appear to be both goldplated- and premature.



110. Revenue projections, which revolve largely around traffic levels do not take into account Cornwall Councils' commitment to reduce car journeys by 5% year-on-year- until 2030, nor do they factor in housebuilding commitments in the area.
111. This increase at this time is not justified. The application has been rushed, and too much money is unnecessarily spent. Toll increases cannot be permanently ruled out, but they are not justified now.

## APPLICANT'S RESPONSE TO THE OBJECTIONS

112. The issues contained within the cases of the objectors are largely addressed in the case for the applicant, set out above. However, they produced a detailed rebuttal,<sup>21</sup> submitted a closing statement<sup>22</sup> and answered further questions on the objections at the inquiry, which are reported in brief below using the same headings as for the objections.

### *Management of the crossings*

113. To suggest that a fall in traffic and increase in revenue over the same period is indicative of inefficient management is incorrect and ignores highlevel capital expenditure in that -time period, the cost of which is spread over time.

114. In addition, spending on day to day management is appropriate and not extravagant.<sup>23</sup> The JC is required, by the parent authorities, to ensure that the crossings are selffinancing- and the management of the crossings is undertaken to achieve that. The JC has invested significant time and effort<sup>24</sup> in seeking to reduce and control costs, and bring efficiencies to the management of the crossings.

115. An independent report was commissioned by the parent authorities into the running of the crossings, specifically to examine, amongst other things, finance and governance, and to provide assurance over current operations and future activities. In writing that report, the authors were asked to focus particularly on the efficiency and effectiveness of the current operating model. That report<sup>25</sup> found that the organisation is fit for purpose.

### *Maintenance and future work programmes*

116. Maintenance and future works programmes are designed and delivered to fundamentally achieve the core aims of the JC, to ensure a safe, reliable and efficient crossing.

117. The standards, methods, costs and aims of the maintenance regime are appropriate<sup>26</sup> and consistent with the aims and ambitions of the JC, instructed by the parent authorities.

118. Whilst it may be possible to delay or defer some elements of maintenance, or otherwise downgrade the high current standards,<sup>27</sup> it is considered that this would not result in longer term efficiencies and could lead to higher costs in future as well as potential higher risks to the condition and usability of the assets.<sup>28</sup>

119. That some of the works are non-statutory<sup>29</sup> (ferry decarbonisation) or relate to potential mitigation for issues which have not arisen at this crossing (bridge fire

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<sup>21</sup> Document 2

<sup>22</sup> ID7

<sup>23</sup> David List in cross examination

<sup>24</sup> Document 1, Proofs of Evidence of David List and Geraldine Baker and in oral evidence of both

<sup>25</sup> Document 1.7

<sup>26</sup> Proofs of Evidence of Stephen Baron and Simon Potter and in oral evidence of both

<sup>27</sup> David List, Stephen Baron and Simon Potter in oral evidence

<sup>28</sup> Proofs of Evidence of Stephen Baron and Simon Potter and in oral evidence of both

<sup>29</sup> David List, Stephen Baron and Simon Potter in oral evidence

protection)<sup>30</sup> does not mean that they are unnecessary, or unworthy of being included in future works programmes. Notably, the ferry decarbonisation project fits with the net zero carbon strategies of the parent authorities and will provide useful knowledge for the replacement ferries in due course. Bridge fire protection is considered sensible and reasonable, given the effect of vehicle fires on similar structures elsewhere in the world and the potential effects were that to happen here.<sup>31</sup>

120. The toll booth refurbishment programme has been refined to be as cost effective and result in as little disruption as possible, with a single new booth built off-site, then swapped with an existing booth. That booth is then refurbished off-site and swapped with another. This chain reaction continues until refurbishment is complete. Although the ultimate aspiration is open road tolling, this is some years away, and given their condition, the booths must be refurbished now to provide a suitable environment for the equipment, and importantly, the staff who work in them.

#### *Visitor centre/offices*

121. The visitor centre has an educational purpose, allowed for in the Acts<sup>32</sup> and provides a benefit to cost ratio of between 3:1 and 4:1. It was part funded by the Heritage Lottery Fund. Spending on this accounts for just 1% of revenue.
122. The office and control centre replacement was subject to detailed scrutiny by both parent authorities and was necessary to provide an adequate control room for the crossings (and the Saltash tunnel which is operated on behalf of National Highways under a re-charge arrangement). The previous building, built to an austere brief at the same time as the bridge no longer provided a safe and suitable environment for the computer and electronic equipment required to run the crossings, nor did it provide a safe or suitable, to modern standards, environment for staff.<sup>33</sup>

#### *Open road tolls*

123. The JC aspires to move to open road tolling, without toll booths as found at other tolled crossings in the country. However, it will take several years to achieve that, and in any event there are still significant costs associated with both implementation and operation of such tolling.<sup>34</sup>

#### *Costs, effects on the local economy and access to facilities and services*

124. The JC recognises that the proposal adds an additional living expense for crossing users but increases in the cost of goods and services also impact the funding and operation of the crossing.
125. The operation, maintenance and improvement of the two crossings is funded from toll income and the cost of delivering a safe, reliable service has already resulted in expenditure exceeding income. Clearly this is not a sustainable position and the increase being sought is essential to ensure the delivery of the service into the future. The crossings operate on a "user-pays" principle and it is

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<sup>30</sup> Proof of Evidence of Stephen Baron and in oral evidence

<sup>31</sup> David List and Stephen Baron in oral evidence

<sup>32</sup> Geraldine Baker in oral evidence (s32 of the 1998 Act)

<sup>33</sup> David List in oral evidence

<sup>34</sup> David List in oral evidence

considered that this spreads the cost of running the crossings fairly across the range of users.

*Local discounts should apply*

126. The Acts do not allow for this; any discount schemes must be generally available,<sup>35</sup> and in any event, even if such a scheme were to be allowed, there would be set up and administration costs required.

*Staff are overpaid*

127. With regard to salary budgets, Local Government pay awards have been higher than anticipated adding significantly to payroll costs.

*Poor comparison to other crossings (tolled and otherwise)*

128. Other crossings do not bear direct comparison. The Severn crossings are owned and operated by the government, and the funding arrangements for other tolled crossings are different to those in place here.

*Inappropriate cross-subsidy*

129. Although revenue from the bridge does in effect subsidise the operation of the ferry, the two are operated together as a single business unit. In workshops and formal meetings Members of the JC decided to retain parity of tolls.

*The bridge has been paid for*

130. The original capital cost to build the bridge has been recouped through the collection of tolls.<sup>36</sup> However, the operation of the bridge (including maintenance and future works) still needs to be funded. Absent any other sources of funding, tolls are therefore required.

131. The 1957 Act that allowed the authorities to build the bridge recognised the need for ongoing funding to maintain and continue to operate it.

*The crossings should be centrally funded*

132. For several years the organisation has sought funding support from central government, both directly and through the south-west sub-national transport body. The JC is committed to seeking funding, either in whole or in part from central government to moderate or obviate the proposed toll revision.

133. Although positive sentiments are and have been expressed by government around funding, these do not change the current, day-to-day financial position of the crossings and cannot be relied on at this time.<sup>37</sup>

*Consultation*

**134.** In September of 2023, Members of the JC resolved to undertake a public consultation on various options<sup>38</sup> to address the financial position. That consultation<sup>39</sup> reached 31,000 crossing users, with a direct response rate of 10% (around 3,100 responses) and then approximately further 4,000 responses

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<sup>35</sup> David List in oral evidence

<sup>36</sup> David List in oral evidence

<sup>37</sup> ID7

<sup>38</sup> Document 1.11

<sup>39</sup> Documents 1.12, 1.13

received online later. The 7,179<sup>40</sup> responses were considered statistically reliable, with around 72% of responses from Cornwall. The majority of responses indicated that they wanted no change in the tolls, and the most common comments were that there should be no price increase, that there should be central government support, lower charges for locals, and higher charges for visitors and that the tolls should be abolished.

**135.** Following this process, the financial model was updated, and a recommended toll revision was presented to Members. The recommended toll revision was not approved by Members, who instead approved a slightly smaller increase. The JC recommendation was then approved by the Full Councils of each of the parent authorities, resolving that the application be made.

*Application is premature*

136. The application is not premature but based on a long term assessment of the forecast financial position of the crossing and the JC. Indeed, slippage beyond the intended date of implementation for the toll increase of 1 November 2024, which, based on the timing of the inquiry is likely, will worsen the income side of the financial model by an additional £200,000 per month.

137. Should alternative sources of funding become available, the toll levels could be reviewed downwards, subject to consideration of the financial effects. It is not yet possible to forecast what level of funding could or would lead to what level of toll reduction.<sup>41</sup>

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<sup>40</sup> Documents 1, 2

<sup>41</sup> Geraldine Baker in oral evidence, ID7

**INSPECTOR'S REASONING**

138. As set out in my preamble, my recommendation, and ultimately the decision must have regard to the financial position and future prospects of the undertaking and shall not make any revision of charges which would be likely to result in the undertaking receiving an annual revenue either substantially less or substantially more than adequate to meet such expenditure on the working, management and maintenance of the undertaking and such other costs, charges and expenses of the undertaking as are properly chargeable to revenue, including reasonable contributions to any reserve, contingency or other fund.
139. At present, the undertaking receives an annual revenue substantially<sup>42</sup> less than adequate to meet expenditure.<sup>43</sup>
140. This application and the desire for funding support, alternative means of funding (be that some other form of exclusive local discount or indexation) or toll abolition should not be conflated.
141. In reaching my conclusions on this application, I accept that it is not the actions of users that cause the toll to rise.<sup>44</sup> I also accept that £100m has been spent by the JC (largely contributed to by the residents of the area, and in particular, those in South-East Cornwall) in 20 years to link two parts of a strategic road, otherwise largely maintained by National Highways.<sup>45</sup>
142. It is suggested that the turn of the century was when expenditure began to outstrip revenue to such a point that borrowing became excessive, and that this was somehow indicative of management failures or inefficiencies. I consider that this is an unfair allegation, which fails to properly take into account the pressures which the JC was placed under at that time. As the JC made clear, the bridge strengthening and widening project was required as a result of legislative changes and there was no government funding to carry out those works.<sup>46</sup> As a result, borrowing was required. That costs have risen in the intervening 24 years, and that other significant capital projects have been required since then<sup>47</sup> which have also required borrowing is a necessary and obvious result of the assets aging, the need to keep them maintained, usable and able to deliver the core function of safe, reliable and efficient crossings now and into the longterm- future.
143. It was suggested that because the JC and the crossings are ultimately the responsibility of the parent authorities, then the reserves could be allowed to deplete, the crossings could fall into deficit, and that the parent authorities would be compelled by the Acts to fund and continue to run them. Essentially that even if the JC had no money, then the crossings would remain open and someone, whether that was the parent authorities or central government, would have to fund them. Whilst it was accepted<sup>48</sup> that the way in which ownership and management of the crossings meant that ultimate fiscal responsibility would fall on the parent authorities, it was also made clear that neither of the parent authorities considered that they had the money to take on that responsibility.

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<sup>42</sup> £1.2m less in the year 2024/25, Proof of Evidence of Geraldine Baker and in oral evidence

<sup>43</sup> Proof of Evidence of Geraldine Baker and in oral evidence

<sup>44</sup> OBJ46

<sup>45</sup> David List in oral evidence

<sup>46</sup> David List in oral evidence

<sup>47</sup> Document 2

<sup>48</sup> Geraldine Baker in oral evidence

That this is the case, and that the crossings should be, and should remain, a self-financing joint undertaking is plain from the resolution of both parent authorities to authorise the JC to make this application, to ensure that the crossings remain self-financing-. Such a case also does not consider the effects of such an approach on wider spending or budgets at the parent authorities.

144. The evidence of the JC<sup>49</sup> is that they are already moderating their borrowing and spending plans; that they are working hard on improving budgeting and cost control to deliver efficiencies, but that all of this is carried out in the context of also seeking to maintain the level of service, pragmatically maintain the assets and infrastructure, forward plan-, and meet the aims of the parent authorities, all whilst focusing on the key mission of the crossings to deliver a safe, reliable and efficient service.
145. I note the suggestion of many objectors that the JC should focus solely on improvements and changes required by legislation or for the upkeep of the crossings. However, it is clear to me that an element of this is beyond the control of the JC, as they are instructed in certain projects and works by the parent authorities. Notably, the ferry decarbonisation project reflects political and environmental aspirations of the parent authorities. In terms of other works not required by legislation, such as the bridge fire protection, these appear to be a pragmatic response to events which have taken place on similar structures elsewhere. The investigation of the options now, and then the factoring in of any possible works to planned maintenance<sup>50</sup> to make best use of resources appears to be a prudent decision, particularly given the worst-case alternative.
146. The refurbishment of the toll booths is clearly necessary. The booths must provide a suitable working environment not only for the equipment necessary to collect the tolls, which must be protected from the challenging environment of the bridge, but more importantly, must protect the people who work in them from the same. The JC clearly explained how they have made savings and efficiencies to this project, replacing one booth, and then refurbishing the others one at a time, swapping them in sequence to complete them all.
147. Many objections related to what is perceived as an expensive, inefficient and traffic-generating means of toll collection, using manned booths. However, as Mr List explained, -openroad tolling, whilst an attractive option in terms of -traffic flow (and potentially in terms of -carriageway-wear<sup>51</sup>) is an expensive system to implement and still requires a large number of staff to administer, particularly with regard to violations. Despite that, openroad- tolling is being investigated as part of the Tamar 2050 project. But again, that would require paying for, whether through debt, which must be serviced, or through revenue, either of which requires toll income.
148. Whilst many suggestions have been made around improvements to the operation of the crossings, which may, or may not, result in lower running costs, there is nothing before me to clearly demonstrate that the implementation of any of them can be carried out with no cost. On the contrary, there is significant and substantial evidence from the JC which justifies their approach to the crossings, their operation and maintenance.

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<sup>49</sup> Document 2, David List and Geraldine Baker in oral evidence

<sup>50</sup> Document 2, Stephen Baron in oral evidence

<sup>51</sup> Stephen Baron in oral evidence

149. I do not doubt that there are alternative ways of carrying out maintenance at the crossings, but alterations to the ferry maintenance- regimes would require at the very least, the rewriting of the specifications for that work, as well as assessment of the likely effects-. Changes to the overarching approach to maintenance and care of the assets would also appear to require the consent of Members of the JC and potentially the parent authorities, both of whom have endorsed, and continue to support the current approach to the management, operation and maintenance of the crossings. All of these costs must be paid for, and the JC has made clear that absent central government funding, this can only be done through the collection of tolls, the current level of which is insufficient to fund the running of the crossings at present.
150. Traffic levels have fallen since the pandemic. I accept that there have been previous falls in traffic levels, but it is clear from the evidence<sup>52</sup> that the pandemic marked a significant drop in traffic levels, and for reasons which are not wholly understood have not returned to pre-Covid levels at these crossings and have not continued to grow in the previously predictable and reliable way. Given income is directly related to traffic levels and toll revenue, this clearly has an effect on the financial sustainability of the crossings.
151. Although the reasons for the failure of traffic levels on the crossings to recover to pre-pandemic levels are not wholly understood, I do not consider that they need to be for this application to succeed. There are possible reasons, discussed and explored by the JC<sup>53</sup> in the application and in evidence to the inquiry, and whilst objectors may have conflicting ideas, there is no definitive answer. Whilst objectors and survey responses<sup>54</sup> suggest that increases will lead to a reduction in journeys, there is no clear evidence that this will lead to a notable or material effect on traffic levels over and above the key factors already identified. In fact, there is evidence that previous toll increases have not reduced traffic levels.<sup>55</sup>
152. There was discussion at the event around whether or not the JC had factored in either the climate change related ambitions of the parent authorities, or housebuilding commitments into their traffic level -forecasts.<sup>56</sup> Whilst the JC has not,<sup>57</sup> I do not consider that this weakens the case for the application. I accept that both of those factors could have longterm- effects and could affect traffic levels. However, they will not happen in the short term. The financial pressures on the crossings are, however, as the evidence shows, immediate. In any case, there is no compelling evidence to show that those two factors (which potentially pull in opposite directions in terms of traffic levels) would affect traffic levels on the crossings, or other journeys elsewhere.
153. I do not find that the spending of the JC on day-today items, including phones and associated devices is excessive, unnecessary or otherwise inappropriate. Given the nature of the crossings and their operation, such spending seems entirely appropriate and was clearly -justified.<sup>58</sup>
154. I also note criticisms of staff salaries, salary rises and overall remuneration packages. I am satisfied with the evidence of the JC on this point, and note that

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<sup>52</sup> Document 1.5

<sup>53</sup> Document 2, ID7

<sup>54</sup> Notably Document 1.12a and 1.12b and OBJ413

<sup>55</sup> Proof of evidence of David List and in oral evidence

<sup>56</sup> OBJ389, ID6

<sup>57</sup> Oral evidence of Geraldine Baker

<sup>58</sup> Proof of evidence of David List and in oral evidence



as local government employees, the JC has little to no control over salary rises as these are set elsewhere. It is also important to consider that the local job market, particularly in relation to ferry staff is competitive.<sup>59</sup>

155. It is an unfortunate and inescapable truth that costs in relation to the operation of the crossings have risen. The cost of living and the costs of doing business for local residents and local businesses have also risen. However, as has been made clear, the particular circumstances of this crossing and its funding arrangements mean that tolls must rise as a result, particularly as it has been demonstrated that there are almost no other acceptable or sustainable options for the JC to make further savings to the costs of running the crossings.
156. It is also deeply unfortunate that owing to the geography of the area, the distribution of facilities and services and their catchments, and the location of the crossings that the residents of south-east Cornwall in particular, face a direct charge to access many facilities and services which are, in qualitative terms, extremely close. In much of the country, this situation does not arise, and indeed, evidence suggests that where tolled crossings are in place, there are more generous discounts for local residents- or regular users.
157. I also recognise the frustration which arises when comparing the cost of the crossings compared to the length of them. However, as the JC have demonstrated, the cost is directly related to the running of the crossings, and their value to the travelling public lies in their availability, not necessarily their length.
158. I also accept that this crossing has a potentially greater 'usage-need'<sup>60</sup> than other crossings with which it is compared, with the Cornwall side of the crossings so reliant on the Plymouth side for critical services. Given that, I do not find that comparisons between these crossings and other tolled crossings, be they bridges or ferries are particularly useful or relevant.
159. On the issue of 'usageneed', issue has been taken with the '-user-pays'<sup>61</sup> principle, given the lack of practical alternatives, as at other tolled crossings or roads.<sup>62</sup> I acknowledge that there are no practical alternatives (in terms of taking a private vehicle from one side of the crossing to the other, not necessarily in terms of journeys, which could use nontolled- modes of transport) here, given the relative length and road-conditions of nontoll- routes. However, that does not alter the fundamental basis on which these crossings are funded and operated, which requires them to be self-financing, nor does it alter the reality of the current situation in which expenditure is exceeding income, and will continue to do so.
160. These crossings, like comparators cited have their own particular circumstances. Whether that relates to how they were originally funded, how they are now funded, their ownership arrangements or their maintenance, management and operational arrangements. So to my mind there can be no sensible or useful comparison. These crossings have their own specific legislation and circumstances, which govern their ownership and operation, and it is not within the scope of this inquiry to change that. I cannot criticise the JC for their

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<sup>59</sup> Proof of evidence of Simon Potter

<sup>60</sup> OBJ46

<sup>61</sup> Document 1, Proof of evidence of David List and in oral evidence

<sup>62</sup> OBJ46

approach to discounts in particular, as they are constrained by the Acts, which require any such discount to be generally available.<sup>63</sup>

161. Everyone accepts that rising tolls would have an effect on the wider community and are unwelcome at a time when costs and financial pressures are also rising. However, the financial evidence is clear that with the crossings being run as directed by the parent authorities, income is required, and at present, the level of income is insufficient.
162. The large majority of the burden of toll increases falls on local residents. It is clear that for tourists, or other infrequent users, any increase would not be as apparent, or have the same effect as it would do for daily (or more) users of the crossings. As I note however, that is an unfortunate consequence of the local geography and distribution of services and their users.
163. Unless and until the ownership and funding arrangements are changed, which would require legislative change and an unknown amount of time,<sup>64</sup> the situation remains that income must pay for the running of the crossings. The vast majority<sup>65</sup> of that income comes from tolls. Costs to run the crossings are rising, and as such, tolls must rise.
164. The JC have been clear that they can only borrow in order to fund capital expenditure. That the level of borrowing, debt repayment and servicing which they carry, whilst high, is neither unusual nor unexpected for an asset-heavy operation such as this. Comparisons were made with telecommunications -companies.<sup>66</sup> The alternative to borrowing for capital expenditure would be for tolls to rise<sup>67</sup> in order to 'save' to be able to spend. Although not costed, such a situation must inevitably also result in higher tolls, and as such, is not a realistic prospect. Such an approach would also harm the ability of the JC to spend large amounts when necessary, and would result in many capital projects currently programmed, which evidence suggests are necessary to fulfil the core aim of safe, reliable and efficient crossings, being delayed until such time as sufficient revenue had been earned to pay for them, with unknown effects on that core aim, or more importantly, the condition of the assets and infrastructure. The approach to management and maintenance of the assets has been developed over time around this model of borrowing (and then debt servicing) for capital expenditure. To change it would require significant time and investment to ensure that the assets can continue to be maintained and managed appropriately whilst the fundamental basis of the operation of the crossings was altered.
165. The case was also made that this would not be the last toll revision application,<sup>68</sup> and that others would inevitably follow. This is true, and the JC has not sought to suggest otherwise.<sup>69</sup> That is an unfortunate, and necessary function of the particular circumstances of this crossing, being self-financing and not otherwise centrally funded. There are, I accept, potential alternatives to avoid such a future application, including central government funding or indexation which would have avoided entirely the need for this toll revision

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<sup>63</sup> David List in oral evidence

<sup>64</sup> Document 2, David List and Geraldine Baker in oral evidence

<sup>65</sup> Document 2, David List and Geraldine Baker in oral evidence

<sup>66</sup> Geraldine Baker in oral evidence

<sup>67</sup> Geraldine Baker in oral evidence

<sup>68</sup> OBJ46

<sup>69</sup> Document 1, Document 2

application and several previous -ones.<sup>70</sup> However, those are not for me or this application to consider.

166. It was put to me that as a result of the closevoting- at the meeting of Cornwall Council around endorsing the decision to apply for a toll revision<sup>71</sup> their resolution should be given less weight than it has on its face, or less weight than the resolution of Plymouth City Council. I do not agree with this position. Whilst Members may have disagreed with the resolution, and indeed, made that clear in their voting, ultimately, the decision of the Council, one of the parent authorities, was to apply for the toll revision.
167. Mention was also made of a letter to Members at Cornwall Council apparently containing advice around voting for bridgerefunding options. I have not seen this letter, and despite suggestions made at the inquiry that I must have it in order to make my recommendation, I do not consider that it bears on my recommendation or that I must see it. This application for a toll revision was made by the JC, instructed by the two parent authorities, acting in accordance with their own democratic processes and relevant -procedures.<sup>72</sup> Any concerns around those processes should more properly be addressed with the parent authorities, and not through this process.
168. Allied to that, it appears that there is much dissatisfaction amongst objectors around transparency and accountability in relation to the running of the crossings, and decision making at all levels. Whilst I cannot deny this dissatisfaction, there is nothing in the evidence which suggests that any information, or processes have been withheld or otherwise made more opaque than necessary. Whilst the approval and management processes of the crossings are unusual (in terms of a crossing owned by two separate authorities, with entirely separate aims, objectives, pressures and priorities, but managed by the JC), and in the way of local government, occasionally somewhat lengthy, they are nevertheless open, fair, democratic and accountable. In addition, ultimately the decision makers who instruct the officers and the JC are elected representatives, so local residents affected by the operation of the crossings do have the opportunity to influence the relevant processes.
169. It is clear to me, from the papers and indeed, the contributions of the Joint Committee Members at the inquiry, that the JC are not afraid to ask questions of their Officers, who in any case, only advise Members.<sup>73</sup> As such, I am not convinced by the allegation that Members are illinformed- or insufficiently able to properly interrogate Officers in order to make appropriate decisions on the way in which the crossings are run.
170. As an organisation, the JC is controlled by, and accountable to the parent authorities, and by extension, the electors of Cornwall and the City of Plymouth, even if not by and to all users of the crossings.
171. With regard to the allegation that this application is premature, especially with regard to the financial intentions of the government following the recent election, and (at the time of the inquiry) upcoming budget, I do not find that it

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<sup>70</sup> Proof of Evidence of David List and in oral evidence

<sup>71</sup> OBJ46, OBJ389

<sup>72</sup> Document 1, Document 2, Document 1.15

<sup>73</sup> David List, Geraldine Baker in oral evidence and ID7

is. The evidence<sup>74</sup> is clear that the deficit position was identified some time ago, and that much work has been undertaken to seek to delay the need for this application. The application itself was delayed<sup>75</sup> pending an update on some hoped-for- government support which was not forthcoming. The financial information and evidence<sup>76</sup> is also clear that it is not appropriate to wait and see if alternative sources of funding arise in the short term, particularly as for every month beyond November 2024 that the tolls remain at their current level, the JC financial position worsens by £200,000.<sup>77</sup> As such, the JC consider instead that the application was late, and even if it were to be approved, is likely to result in some financial shortfall. If central government funding was made available, the JC was clear<sup>78</sup> that the tolls could be reviewed again to take that into account.

172. On this point, I note the criticism made at the inquiry that the financial model was not updated for the inquiry. Whilst I accept that the detailed position will have changed since the application was made and the evidence submitted, I accept the position of the JC that any change since then would be immaterial,<sup>79</sup> that the position would only have worsened in that time, and that there have been no changes in context or circumstances that would have made a positive difference to the financial position. It is also not unusual or unexpected for an application of this sort to have to set a date and pick a cut-offpoint for the production of- data, particularly financial data, around which the application is built.
173. Fundamentally, despite the position of the objectors and their concerns around management of the crossings, not raising the tolls, and thereby worsening the financial position is not a solution. Similarly, whilst alternative funding, or central government funding may present a solution in the longterm, it is not currently available, but the financial pressures on the crossings and the JC are immediate.
174. The financial sustainability of the crossings in the short term is essential for the long-term maintenance and provision of the crossings, which are, as noted by objectors, critical infrastructure and essential lifelines for the region.

## **INSPECTOR'S CONCLUSIONS**

175. For these reasons, I find that although undoubtedly unwelcome by some, in spite of the increased cost for users, and despite the criticisms of objectors, the evidence is clear that the proposed toll revision would be necessary having regard to the financial position and future prospects of the undertaking in accordance with the 1954 Act.
176. The crossings are, and are required to be, self-financing, whilst providing a safe, efficient and reliable service. Toll income makes up over 90% of the JC income and this is currently insufficient to meet the expenditure necessary to provide now and into the future, safe, reliable and efficient crossings at the bridge and

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<sup>74</sup> Document 1, Document 2, David List and Geraldine Baker in oral evidence

<sup>75</sup> Document 2

<sup>76</sup> Documents 1, 1.9, 1.10, 1.11, 1.16, 1.17, 2, David List and Geraldine Baker in oral evidence

<sup>77</sup> Document 2, David List and Geraldine Baker in oral evidence

<sup>78</sup> David List and Geraldine Baker in oral evidence

<sup>79</sup> Document 2, Geraldine Baker in oral evidence

the ferry. Despite the effects of a toll increase on users, the evidence supporting the need for a toll increase is compelling.

177. Having examined the evidence of the JC and the objectors, heard evidence at the inquiry which was tested through examination and cross examination, I am satisfied that the proposed revision would not result in the undertaking receiving an annual revenue either substantially less or substantially more than adequate to meet the necessary costs of working, management and maintenance of the crossings, including costs that are properly chargeable to revenue and reasonable contributions to the reserve.

**RECOMMENDATION**

178. I therefore recommend that the Order should be made as proposed.

*S Dean*

INSPECTOR

**APPEARANCES****The Applicant**

Ben Curnow, Solicitor called	Principal Lawyer, Cornwall Council
David List BSc MBA CEng FICE	General Manager, Tamar Crossings
Geraldine Baker ACA LLB (Hons)	Finance Analyst Manager, Cornwall Council
Stephen Baron BEng CEng MICE	Technical Director, AECOM
Simon Potter MEng MRINA	Director, Sustainability Advisory, Houlder Ltd
Andrew Vallance	Governance and Finance Manager, Tamar Crossings

**Objectors**

(Listed by order of first appearance)

Scott Slavin	Tamar Toll Action Group (TTAG) (OBJ 46) and local resident
Sheryll Murray Cllr Martin	Local resident and former MP for South-east Cornwall Local resident and Cornwall Councillor for Lostwithiel & Lanreath Electoral Division (OBJ 389)
Victoria Slavin	Local resident (OBJ 397)
Robert Parsonage	Local resident and Reform UK Cornwall organiser
Fiona Hoskin	Local resident (OBJ 189)
Andrew Steadman	Road Haulage Association (OBJ 393)
Pete Newman	Newman Haulage Ltd (OBJ 388)
Bob Davidson	Local resident
Dennis Morgan	Local resident
John Gatehouse	Local resident
Gordon Hannah	China Fleet Country Club (OBJ 299)
Steve Miller	Local resident (OBJ 403)
Vince Goodyear	TTAG (OBJ 46), CBL and local resident
Sarah Martin	Local resident (OBJ 404)
Anna Gelderd MP	MP for South-east Cornwall (OBJ 413 statement read on her behalf)
Jane Suter	Local resident

**Others**

(Listed by order of first appearance)

Cllr Coker	Joint Committee Member (Plymouth), Plymouth City Council Cabinet Member for Strategic Planning and Transport
Cllr Worth	Joint Committee Co-Chair (Cornwall), Cornwall Council Member for Saltash Trematon & Landrake Electoral Division
Cllr Tivnan	Joint Committee Member (Cornwall), Cornwall Council Member for Torpoint Electoral Division
Cllr Toms	Joint Committee Member (Cornwall), Cornwall Council Member for Looe East & Deviock Electoral Division

**APPENDIX 1 – INQUIRY DOCUMENTS**

- ID1 Opening Statement for the Joint Committee
- ID2 RHA Statement (OBJ 393)
- ID3 Anna Gelderd MP for South-east Cornwall Statement (OBJ 413)
- ID4 Tamar Toll Action Group Opening Statement (OBJ 46)
- ID5 Tamar Toll Action Group Closing Statement (OBJ 46)
- ID6 Cllr Martin Statement (OBJ 389)
- ID7 Closing Statement for the Joint Committee

**APPENDIX 2 –APPLICATION DOCUMENTS**

1. The Application (appendices listed below)
  - 1.1. TBTF Income, Expenditure & Reserves 1996-2028 (Table)
  - 1.2. TBTF Income, Expenditure & Reserves 1996-2028 (Graph)
  - 1.3a TBTF-Audited-Statement-of-Accounts-2020-21
  - 1.3b TBTF-Audited-Statement-of-Accounts-2021-22
  - 1.3c TBTF-Audited-Statement-of-Accounts-2022-23
  - 1.4 TBTF Car & Light Goods Toll Levels 1982 - Present
  - 1.5 Tolled direction traffic 1985-2023
  - 1.6 TBTF monthly Eastbound traffic volume pre & post Covid
  - 1.7 Local Partnerships Review Final Report
  - 1.8 JC Business Plan 24-25
  - 1.9 Income Expenditure Forecast 2024-2040 no revision (graph)
  - 1.10 Income Expenditure Forecast 2024-2040 no revision (table)
  - 1.11 JC Meeting 7 September 2023 Future Financing Report
  - 1.12a Public Consultation leaflet 2023 (A4 version)
  - 1.12b Public Consultation Questionnaire 2023 (A4 version)
  - 1.13. TBTF Financing the Crossings 2023 - Consultation Results Report
  - 1.14a JC Meeting 8 December 2023 Future Financing Report
  - 1.14b JC Meeting 8 December 2023 Future Financing Report app 4
  - 1.14c JC Meeting 8 December 2023 Future Financing Report app 5 supplementary
  - 1.15 JC Meeting 8 December 2023 Minutes
  - 1.16 Income Expenditure Forecast 2024-2040 with Revision (table)
  - 1.17 Income Expenditure Forecast 2024-2040 with Revision (graph)
  - 1.18 Bridge All Class cash tolls - comparison with other crossings
  - 1.19 Ferry All Class cash tolls - comparison with other crossings
  - 1.20 Illustrative toll increases with RPI datum Mar 10 to Feb 24
  - 1.21 Text of Public Notice of Application
2. Applicant Statement of Case (containing a rebuttal to the Objections and the Proofs of Evidence of Mr List, Miss Baker, Mr Baron, Mr Potter and Mr Hope)

Specific objections mentioned in the report are referred to by their Objector number, listed below in Appendix 4.

**APPENDIX 3 – SCHEDULE OF CURRENT AND PROPOSED TOLLS****Tamar Bridge Toll Classification**

	Classification	Current Toll	Proposed Toll
1	Solo motorcycles	No charge	No charge
2	Motor cars and vehicles not covered by other classes	£2.60	£3.00
3	2 axle vehicles having a maximum gross vehicle weight exceeding 3.5 tonnes	£6.30	£7.30
4	3 axle vehicles	£10.40	£12.00
5	Vehicles with 4 or more axles	£14.30	£16.50

**Torpoint Ferry Toll Classification**

	Classification	Current Toll	Proposed Toll
1	Solo motorcycles	£0.50	£1.00
2	Motor cars and vehicles not covered by other classes	£2.60	£3.00
3	2 axle vehicles having a maximum gross vehicle weight exceeding 3.5 tonnes	£6.30	£7.30
4	3 axle vehicles (not currently carried)	£10.40	£12.00
5	Vehicles with 4 or more axles (not currently carried)	£14.30	£16.50



**APPENDIX 4 OBJECTIONS**

(OBJxx)

1	Angeline Rietveld	52	Connor Palin
2	John Speare	53	Donna and John Garwood
3	Colin Reynolds	54	Stephen Oates
4	A J Harding	55	Joyce Marsden
5	Andrew Oldfield	56	Anthony Cocks
6	Amelia Bridges	57	Martin John
7	Ben Fugue	58	Anne Davey
8	Alison Cole	59	M J Temple
9	Athalie Redgrove	60	Lucy Hawkin
10	Anton Maguire	61	Gerry Parmenter
11	Barbara Harris	62	Sharon Stone
12	Jenny Pitt	63	Katy
13	Anthony Jones	64	Adam David
14	E A Jones	65	Karen Henderson
15	Frankie Hannon	66	Lee Lidstone
16	Robert Metcalf	67	Mr B Hosking
17	Antony Briggs	68	Karen Drake
18	David Nias	69	Fiona Hamilton
19	Gail Kelleher	70	Julie Tebbit
20	Graham Newman	71	Julie Angel
21	Lesley Taylor	72	Luke Smith
22	Carole J Hall	73	Neil and Angela Lander
23	David Hopwood	74	Nigel Fisher
24	Janet Garrett	75	Martin Uglow
25	Edmund Wilson	76	Jennie Gunn
26	Philippa Elford	77	Michael Undy
27	Lorraine Wesemann	78	James Elford
28	John Kelly	79	Michael Holtham
29	Graham House	80/350	Adrian Hendry
30	Michael Dodkins	81	S Carter
31	Barbara House	82	Sarah Armstrong
32	John Wesemann	83	Margaret Webb
33	Sharon Lambert	84	Sandra Martin
34	Teresa Harrison	85	D Newton
35	Helen Manning	86	Tricia Aire
36	Philip and June Toms	87	Paula Watson
37	Richard Smith	88	D Prentice
38	Graham Moynihan	89	Pam Lintott
39	Jackie Turner	90	Ralph Ellis
40	Richard Avent and Jenny Snell	91	L Stewart-Birch
41	Martin Mudge	92	Melanie Priston
42	Jami Harker	93	Mark Gunni
43	Lisa Willis	94	J Green
44	Helen Pocock	95	Paul Davies
45	Nicola Thornton	96	Jeff Hocking
46	Tamar Toll Action Group	97	Louise Hone
47	Sydney H	98	Iain Miller
48	Elizabeth Thomas	99	Rose Brooks
49	Adam Kellaway	100	Graham Wills
50	Tryst Fentem	101	Thomas Thrussell
51	Jason Holtom		

102	Gary Thrussell and Susan Thrussell	155	Christopher Latham
103	Nicholas Peacock	156	Hazel Latham
104	Matthew Robertson-Jones	157	Trevor Davies
105	Steve Dawe	158	Rayna Jarrouj
106	Simon Lithgow	159	Dianne Smith
107	Steven Cocks	160	Richard Bracey
108	Duloe Parish Council	161	Jay Raby
109	Christopher Hicks	162	Lisa Phelan
110	Stephen Davies	163	Lynne Stephens
111	Elaine Keat	164	Sharon Jones
112	Teresa Jewitt	165	Sean Sweeting
113	Stephen Gosling	166	Grant Gilmore
114	S George	167	S Edwards
115	Tim Squires	168	Andrew and Rachel Lynde
116	H S & J M Williamson	169	Debra Rhodes
117	Tim Marson	170	Teresa Down
118	Andrew Venton	171	Graeme Francis
119	Iain Bryans	172	Dawn Jeffery
120	Rachel Tobin	173	Natasha Harrison
121	Kerry Webber	174	Amanda Freeth
122	P T Palmer	175	Rebecca Hinnit
123	Richard Moody	176	Lewis
124	Peter Wilkes	177	Daisy Dunn
125	M J Haimes	178	Valerie Wells
126	Gavin Whale	179	David Wells
127	Lindsay Cork	180	Carolyn Reynolds
128	James Loveridge	181	John Taylor
(129	Withdrawn)	182	James Cruse
130	Jane Michie	183	Pauline Bowers
131	Graham Harrison	184	Thomas Hawken
132	Paul Hibbert	185	Lindsay Hunt
133	Nick Horler	186	Robert Taylor
134	A Thompson	187	Saul Whitford
135	Tom Manuel	188	Robert Suggett
136	James Wakeman	189	Fiona Hoskin
137	Z Ritter	190	Peggy Coley
138	Warren Bassett	191	Daniel Samways
139	Fiona and Tom Aldridge	192	John Nicholson
140	Neal Clark	193	Simon Lovell
141	Peter Northmore	194	John Robert Sneyd
142	Janette Cooper	195	Michele Proctor
143	Howard Cooper	196	Kate Acres
144	Mark Gott	197	Robert Love
145	Ocean City Properties	198	Damien Goodall
146	Hilary Barrett	199	Alastair Brown
147	Mark Peste	200	Jonathan Juleff
148	M Pester	201	Lorraine Harry
149	Colin Plumb	202	Yana Lopez
150	Paul Slade	203	Tomas Lenton
151	Nyssa Jacobsen	204	Simon Graham
152	Rob Pomeroy	205	Fiona Haley
153	Ted Coryton	206	David Hoskin
154	Roy Cooper	207	Anne Riggs
		208	Jo Gale

209	Scott Christie	263	Richard Milton
210	M Sharpe	264	Sarah Ryan
211	Dave Cates	265	Lisa Holland
212	Daniel Hale	266	Joanne Hickey
213	Jane Mayes	267	G Christie and M Shirley
214	S Carter	268	Barry Moles
215	Susan Howdle	269	Steve Tyers
216	Mr and Mrs D J Morrell	270	Cammy Sood
217	Matthew Waterworth	271	Marilyn Plotrowski
218	Carolyne Graber	272	Jayne Sullivan
219	Marcus Wills	273	Alan Cassie
220	Charlie Thurkettle	274	Catherine Mudge
221	Vivian Finnigan	275	Hannah Neves
222	P G and J E Church	276	G J Townshend
223	Adrian Russon	277	Tony Nott
224	D Nation	278	Richard Budd
225	C P Nitro Ltd	279	William Kennington
226	Paul Lucken	280	Julian Trehair
227	Maria Townsend	281	Terence and Patricia Marshall
228	C Ashton	282	Fred Champion Groundworks Ltd
229	Drew Kearney	283	Amanda Speedie
230	Tim Jewell	284	Ian Crossett
231	Jayne Darlington	285	Peter Shorten
232	Richard Brant	286	John Collings
233	Steven Crouch	287	Paul Watson
234	M Pearse	288	June Tremblett
235	Mike Clover	289	W G Arthur
236	Susan and Gerlad Donne	290	M G and A White
237	Ian and Juliet Anderson	291	Sue Latham
238	Tracy Hipkin-Wale	292	Andrew and Zeana Bevan
239	Wayne Ross	293	Sharon Gawman
240	Mark Kenny	294	Joan Milton
241	Lesley Badock	295	Tony P Skelton
242	Mary Gilmour	296	Andrew Haly
243	Mike Barker	297	St Mary's Leadworks
244	R Milton	298	Paul Westaway
245	Shirley Mirakian	299	China Fleet Country Club
246	Kelly Thomson	300	James Barnett-Viney
247	Jane Selby	301	Dave Halford
248	Andrew Wilton	302	James Richens
249	Sandra and Peter Booth	303	Edward Buckingham
250	Derek Allen	304	Lisa Mortimore
251	P Goodall	305	Sarah Young
252	William Mirakian	306	Neil Hunt
253	Simon Townsend	307	Mr and Mrs Pearce
254	Bernadette O'Sullivan	308/343	Sue Wayne
255	P Pryor	309	Susan Shand
256	Jill Allen	310	Gail Smith
257	G Hanns	311	John Smith
258	Les Aggett	312	Brian Pedder
259	Mrs L J Howlett	313	Tom Miller
260	Terry West	314	Jan Foulis
261	Hine Marquees	315	Sharon Clench
262	David Oakes	316	Alyson Wills

317	Carole Brett	366	Shaune Richardson
318	Dave	367	Susan McCulloch
319	Ryan Sparks	368	Nigel Melrose
320	Joanna Shepherd	369	Vicki Barry
321	Michael Norwood	370	Robert Foster
322	David Rose	371	Stephen Bashford
323	Keith Field	372	Emma Seal
324	ZLC Energy	373	A M Stafford
325	Mark Edgecombe	374	Stewart Frater
326	Sarah Edwards	375	Paul Moxhay
327	Georgina Knight	376	Catherine Crocker
328	Lindsay Mansfield	377	Ian Lidstone
329	Sue Lord	378	Steve Rowlands
330	Ann Stoakes	379	Scott-Daniel Hackney
331	Saira Searle + others	380	Michael Jackman
332	Brian Clifford	381	Michael Welch
333	Dave Coot	382	Ken Vangorph
334	Peter Brocklehurst	383	Leslie R Hellings
335	Elsa Griffiths	384	Aileen Fraser
336	Alison Spencer	385	Clare Collins
337	Glyn Thomas	386	Rebecca Escott
338	Liz Midwinter	387	Chris Boxall
339	Ann Yeo	388	Peter Newman
340	Alan Libby	389	Colin Martin
341	National Alliance Against Tolls	390	Sandra Barnes
342	Kevin Cross	391	Luke Stanton
343/308	Sue Wayne	392	Karen Davies
344	Jacqui Gratton	393	Road Haulage Association
345	Stacey Owen	394	Ian Pethick
346	Susan Horne	395	David and Kathy Huxford
347	Ann Cullum	396	Teresa Lindeyer
348	Terry Williams	397	Victoria Slavin
349	John Pengelly	398	Katie Hayward
350/80	Adrian Hendry	399	Darren and Teresa Stanbury
351	Sam Robinson	400	Darren Mansfield
352	Matthew Fish	401	Clare Mills
353	Stephen Lobb	402	Chris Still
354	Rich Collins	403	Steve Miller
355	Beryl Williams	404	Sarah Martin
356	Lynda Harvey	405	Denise Eaton
357	George Barnacle	406	Deane Newton
358	Ian James	407	Gareth Wenmoth
359	Dave Holland	408	Andy Horne
360	Jo Knight	409	Aaron Rockey
361	Lee Seymour	410	Stephen Beeny
362	Barry Cripps	411	Simon Adams
363	Michael Boon JP	412	Luke Halls
364	Chris Tustin	413	Anna Gelderd MP for South-east Cornwall
365	Nathan Carter		

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