

Problems with private roads

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How to get better value from public and private investment.

Executive summary

A number of initiatives and reports, from inside and outside Government, have recently discussed various ways of encouraging more private investment in the UK's main and trunk road network.

We have previously highlighted the risks to pension funds and other investors of toll roads. With these concerns now being echoed by investors themselves - particularly for new-build road schemes - and the Government committed not to toll existing roads, other methods of providing revenue streams for private investors are now being talked about.

These include shadow tolls, public-private partnership deals and even the hypothecation of Vehicle Excise Duty (VED) to fund road building – something that would be a radical departure from Treasury practice in all other areas of taxation.

This paper summarises recent work on these issues by Campaign for Better Transport and others. It highlights the large number of problems and questions that arise from all these methods of privately funding new roads in the UK:

- Toll roads are not bringing in projected revenues in the UK and are politically controversial
- Shadow tolled PFI-style schemes have proved very bad value for the taxpayer
- Hypothecation of VED to fund a private roads agency would lead to poor or biased funding decisions that did not achieve the best value for money

Spending and investment priorities

We propose that private investment is channelled instead to fund projects with clearer, more reliable revenue streams such as public transport infrastructure and associated developments, including:

- Station developments
- Railway line reopenings
- Light rail, tram and rapid transit bus projects

Public money for roads should be focused completely away from new road building, with spending channelled towards:

- Maintenance of roads, both trunk and local
- Small-scale and larger repair projects
- Removal of genuine pinch points at junctions and level crossings
- Improving conditions for non-motorised users

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Introduction

Since the Chancellor's Autumn Statement in November 2011 introduced the issue, a range of plans for attracting large-scale private investment into road-building have been floated by the UK Government as a way of creating jobs without adding to the balance sheet of Government borrowing.

These proposals have included attracting direct private investment into new toll roads (with an accompanying pledge not to toll existing roads), the setting up of a platform for UK pension funds to invest directly or indirectly in infrastructure projects, and financial guarantees from Government for private infrastructure projects.

In March 2012, the Prime Minister announced in a speech to the Institute of Civil Engineers that an initial £2 billion of pension fund money had been committed to infrastructure investment by 2013.

However, in the same speech he also announced a feasibility study into a wider range of different methods for attracting much larger private investment specifically into the road network.

The Prime Minister said:

"We need to look urgently at the options for getting large-scale private investment into the national roads network; from sovereign wealth funds, from pension funds, from other investors. That is why I've asked the Department for Transport and the Treasury to carry out a feasibility study of new ownership and financing models for the national roads system and to report progress to me in the Autumn. Let me be clear: this is not about mass tolling and, as I've said, we're not tolling existing roads; it's about getting more out of the money that motorists already pay."

Proposals by other bodies have also suggested that Vehicle Excise Duty (VED), currently collected and placed in the general budget pot along with other taxes, should be hypothecated specifically to fund road building.

While the possibility of new money for rail, tram and station projects might be good news whatever its source, Campaign for Better Transport is concerned about the focus on new roads and has highlighted the problems that may be faced by investors in toll road projects.

It is clear from recent comments by those representing pension providers that they consider some of these problems to be serious and that their aim in getting involved in public infrastructure is to balance their investment funds by finding projects that don't depend on Gross Domestic Product (GDP) growth for income, but instead are "availability based" or backed by public guarantees.

As a contribution to the debate around these options, this report looks in more detail at the specific problems that are faced by attracting private finance into funding new roads and suggests alternative approaches for public and private investment.

1. Toll roads

Proposals being discussed:

Direct tolls on vehicle journeys have been proposed by some industry groups as a way of maintaining an income stream for privately funded new roads.

Of the roads managed by the Highways Agency, the A14 between Huntingdon and Cambridge (previously the subject of a £1.2 billion widening and bypass plan that was dropped in the Spending Review because of its huge cost), the A1 in the north east of England, the A303 in the south west and the A27 near the south coast have been put forward as possible toll road projects. The possible introduction of new toll lanes has also been discussed, for example by the RAC Foundation¹.

The Government is strongly committed to avoiding tolls on any existing roads, but is working in collaboration with pension fund providers and representatives to set up a platform for pension funds to invest in infrastructure, which is considering new toll roads among other types of projects. The Department for Transport's 'A14 Challenge' is currently reconsidering options for the A14 corridor in Cambridgeshire, including tolling of any new stretches of road that may be proposed.

The problems:

Campaign for Better Transport has previously studied the problems experienced by a number of road and bridge toll projects, including the Mersey Gateway Bridge and the loss-making M6 Toll motorway^{2,3}. Ahead of the Autumn Statement last year we also produced a briefing for pension funds on the risks of investing in these projects⁴.

The risks to investors include:

- The need for large guarantees from local or national government to make these investments attractive (this is the case for the Mersey Gateway Bridge), which makes them vulnerable to political changes and pressure
- Additional risks to timescales for regulatory



approval and delivery, due to community opposition to new roads

- Strong evidence that forecasts for traffic on existing roads, and toll roads in particular, are over-optimistic worldwide and in the UK, as the M6 Toll experience shows. A 2011 analysis of 100 completed toll road projects around the world found that road traffic forecasts have been over-optimistic by 20-25 per cent⁵
- Additional problems in the UK due to longstanding driver opposition to pay-as-you-drive
- The UK also has a very highly developed existing network with large numbers of alternative routes available to drivers who wish to avoid tolls compared with other countries in Europe and the rest of the world⁶

The M6 Toll motorway

Since our first review of the M6 Toll³, further drops in traffic levels and revenue have been seen, and continual increases in toll levels have failed to bring the road to profitability. The latest financial report for the road describes these problems and shows a loss of £41.7 million for the year ending on 31 December 2011⁷. Figures 1 and 2 show the drop in traffic and increase in toll rates from the opening in 2004 to 2010⁸.

The A14 in Cambridgeshire

A study conducted as part of the A14 Challenge and published in June 2012⁹ contained an initial assessment of the potential for using toll revenue to raise private investment in the project.

Figure 1: Drop in annual average daily traffic flows on the M6 Toll

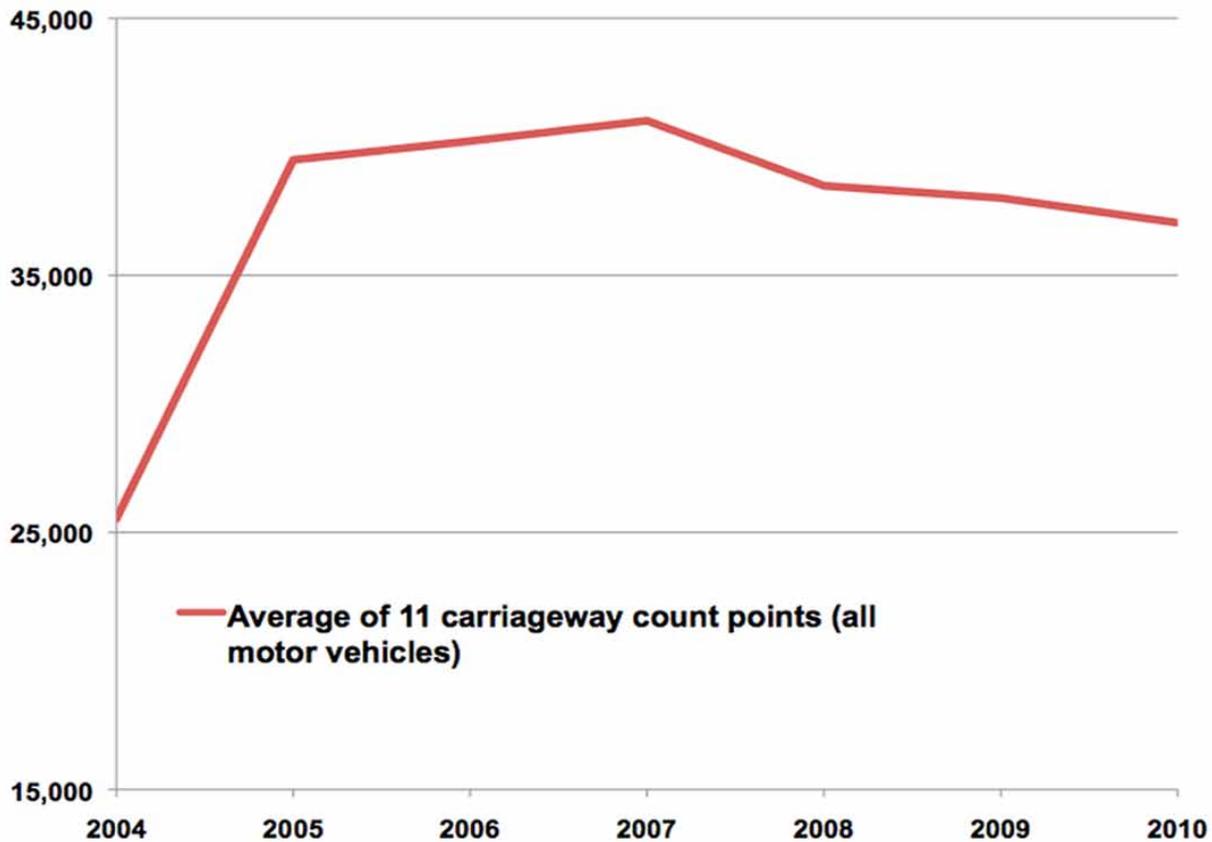


Figure 2: Rise in toll rates on the M6 Toll



A broad initial estimate of the total annual income from the road included a toll of £1.50 per car and £3 per HGV plus a range of contributions raised by local authorities, such as retained business rates from Alconbury Enterprise Zone and the wider A14 corridor, New Homes Bonus payments and a proportion of Community Infrastructure Levy and Section 106 (developer) contributions. Even with all these additional sources of funds added, tolling a new section of A14 would only result in an annual income of up to £30 million.

The study estimated that this income could bring in up to £370 million in private investment via a hybrid mechanism combining private finance and bonds, leaving a big gap to be filled between this figure and the capital cost of the road packages (the lowest cost for a package with tolling potential was £750 million). In addition, the cost estimates do not include maintenance for 25 or 40 years, which would also need to be included in any deal.

Toll problems elsewhere

In other countries, toll roads have also experienced problems with over-optimistic traffic forecasts.

AUSTRALIA

In Brisbane, operator River City Motorway went into receivership in 2011 after predicted traffic flows on the tolled Clem7 tunnel, which it had built under a 45-year contract, fell to less than a third of what was predicted. Administrators are taking legal action against the consultancy that made the traffic forecasts¹⁰.

FRANCE

Doubts are emerging over the viability of the €750 million Strasbourg bypass toll road. Vinci, the construction company that had been the preferred bidder, was told by the French Government in June 2012 that it had been withdrawn from the process after it had failed to confirm how it would finance the project¹¹.

2. Shadow tolls and public-private partnership deals

Proposals being discussed:

Shadow tolls are annual payments made to private companies contracted to build and manage public roads, and are based on measured traffic levels. No payments are made directly by drivers. These availability-based contracts are similar to those employed in Private Finance Initiative (PFI) projects in other sectors.

For roads, the most recent PFI-style deals have been the Design, Build, Finance and Operate (DBFO) projects set up by the Highways Agency (HA), where the cost of capital and maintenance is covered over a fixed term by a private consortium of bidders in exchange for an annual shadow toll paid by the HA.

The A1M near Peterborough was one of the first such projects, and this 21 km stretch of widened motorway has been referred to in connection with the A14 Challenge as a model for funding the large bypass and widening proposals.

Recent comments from pension fund providers also suggest that, rather than toll roads, their favoured method for investment in new roads would be via these kinds of PFI-style contracts.

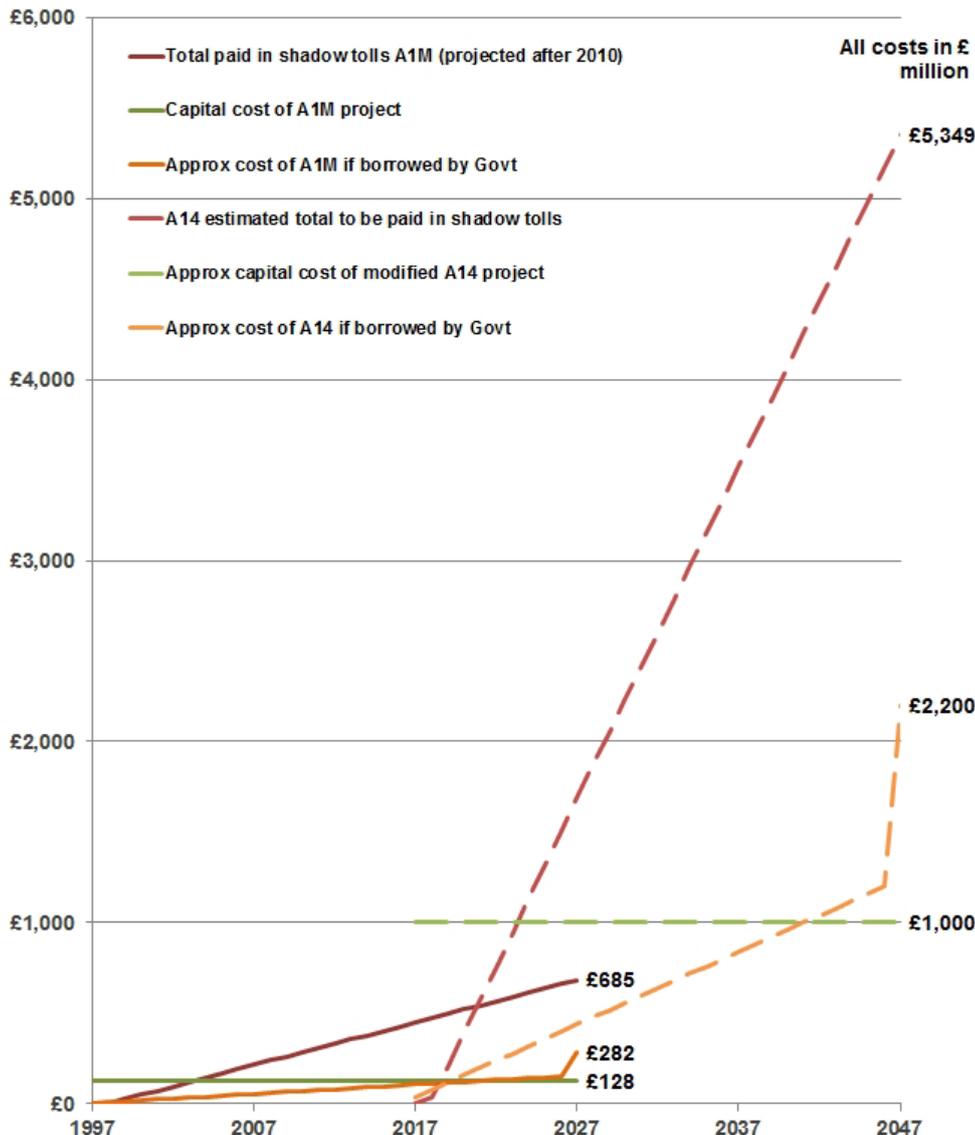
The problems:

PFI has proved to be notoriously bad value for taxpayers across the whole spectrum of Government procurement and investment. A 2011 report by the House of Commons Treasury Committee concluded that¹²:

“The cost of capital for a typical PFI project is currently over 8% - double the long term government gilt rate of approximately 4%. The difference in finance costs means that PFI projects are significantly more expensive to fund over the life of a project. This represents a significant cost to taxpayers.”

The Europe-based NGO Transport & Environment has recently highlighted how the over-use of public-

Figure 3: Cost of the A1M private finance deal - and likely cost of the A14 project on the same terms



private partnership finance to build large amounts of new road infrastructure has contributed to the failing economies of Portugal, Spain and Greece¹³.

A 2006 independent analysis of the first eight DBFO road projects in the UK showed how poor the value for taxpayers of this kind of outsourcing is¹⁴. The analysis concluded:

"In 3 years, the Highways Agency had paid more than the construction cost. It was unclear whether the payments were higher than expected at financial close.

Its private sector partners reported a post-tax return on capital of 29% and an effective cost of capital of 11% in 2002, twice the cost of public finance."

The A1M as a model for the A14?

To illustrate just how unfavourable the terms of shadow tolling agreements are to the public purse, we have looked at the A1M DBFO and the cost of shadow tolling for this project in more detail, and have projected how a similar deal would affect the overall price paid by the public for the A14 project.

The £128 million A1M opened in 1998, with a system of shadow tolls on a 30 year DBFO contract. Figures obtained from the annual accounts of the contractor company Road Management Services (Peterborough) Limited show that shadow tolls of around £22-24 million have been paid annually to the company by the Highways Agency since 1999¹⁵.

Figure 3 shows that the total paid for the A1M DBFO by the HA by the end of 30 years will be around £690 million (profits for the contractor would of course be reduced by the cost of maintenance of the road, which the HA also saves).

By proportion, Figure 3 then shows the effect of a similar arrangement of shadow tolls on the A14 project (with the construction cost reduced to £1 billion to account for savings made in putting together a new proposal but, again, not allowing for maintenance costs). This shows that the eventual price paid by the public for funding the A14 this way would be more than £5 billion, or nearly £180 million per year.

The chart also includes the approximate cost of bond finance at current yields of around 4 per cent. This estimates that publicly funding the project in this way would cost at least £3 billion less than a private deal funded by shadow tolls.



3. Hypothecation of VED or fuel duty

Proposals being discussed:

In the search for revenue streams that avoid directly tolling car drivers, there has been some discussion about hypothecating a proportion of Vehicle Excise Duty (VED) or fuel duty for use as an income for private investors to borrow against to fund new capacity. It has also been suggested by motoring groups that such a revenue stream might be used to provide a privatised Highways Agency with an annual budget¹.

The problems:

None of these ideas have yet been proposed in detail, but even the brief descriptions above raise a large number of important questions about governance, policy setting and value for money.

Governance and policy issues

A hypothecated tax used solely for road spending is a major step away from normal Treasury practice to avoid hypothecation because of the need for ministers to have discretion to set priorities for spending tax revenue under a democratic framework.

In order to preserve this discretion, it would be necessary for a privatised Highways Agency with ownership of VED income, or a set of private contractors with contracts to receive VED, to be very closely regulated in terms of what kinds of projects go ahead. If such an agency operated freely as a private company, commercial considerations would be likely to come above, for example, health or climate change policy goals, so methods of regulation at least as strong as those governing Network Rail would be needed.

Even within the sphere of 'cars and driving' policy there would be problems. For example, would the necessity for VED to raise a minimum level of revenue compromise the ability to use it to incentivise cleaner cars or change to another mechanism altogether (e.g. to a dramatically sliding scale of vehicle sales taxes and rebates, known as 'feebates', as recently proposed

by Campaign for Better Transport¹⁶)?

There would also be significant issues to solve when implementing this change in devolved countries. Governments in Scotland, Wales and Northern Ireland will not be comfortable seeing VED paid by their citizens going principally to fund English trunk roads via the Highways Agency.

Value for money issues

As with all public-private deals, a substantial part of the money raised from VED would, in the end, go towards subsidising private profits. There is every chance that these proposals would end up as discredited as PFI or DBFO in terms of value for money.

It is also likely that the Treasury's Green Book principles for making public spending decisions with an open mind about which solutions will solve a problem would be eroded in this kind of regime. The Eddington Transport Study of 2006 praised the Department for Transport for its option identification processes, saying⁶:

"The Department for Transport is rightly committed to an evidence-based approach which assesses policies and projects thoroughly before committing to their implementation. This report has built on this approach and has been rigorous in identifying the challenge or objective at the outset before going on to assess a range of solutions, without favouring a particular mode or type of policy intervention, based on a rigorous assessment of the full costs and benefits of individual schemes."

This good practice, and the principles recommended by Eddington, would clearly be put at significant risk by hypothecation of VED purely to roads, leading to reduced value for money for the taxpayer from transport spending.

The International Monetary Fund has recently warned about preserving value for money when providing funds or guarantees for infrastructure. Its Country Report for July 2012 commented¹⁷:

"Boosting infrastructure spending would support growth, given its high multiplier and ability to increase productive capacity. However, it is important that the choice of projects and the modalities of their operation (public versus private) and financing (e.g., issuing public debt versus guarantees) be based on efforts to use public funds as efficiently as possible. Such decisions should not be affected by artificial attempts to limit government gross debt or near-term expenditure by transforming costs into contingent liabilities that might be realized only later."

Public perception and political issues

Public opinion is unlikely to favour this proposal once the implications for the local roads they use every day become clear, and this would complicate the process of passing any required legislation.

Most drivers spend most of their driving time on local roads and rarely use HA-managed roads. How will drivers react to hypothecation if these local roads are seen to be neglected while trunk roads, perhaps many miles from where they live, receive all the money raised from VED?

There is also already a (mistaken) perception that only car drivers 'pay for the roads'. So, would non-motorised road users, and other people affected by roads who do not pay VED, be seen as relevant stakeholders in the national road network after this change or would they be further marginalised? And how would the move affect relations between different groups of stakeholders?

Campaign for Better Transport has already raised concerns about these issues in its response to the Cook Review of the Highways Agency, and how the report's view of motorists as the principal set of HA 'customers' precludes a more holistic view of the effects of the road network¹⁸.

The setting of future levels of VED would be exceptionally problematic in political terms, probably even more so than fuel duty levels are now. The relatively close coincidence of current revenue from VED (approx. £5 billion) and the Highways Agency's annual budget (£4.2 billion in 2011-12¹⁹) is just that.

For a wide range of reasons, transport spending or HA funding needs may increase, and VED revenue is likely to decline as people choose cleaner cars.

Renegotiating VED levels when car owners and privatised providers have strong vested interests in pushing them in opposite directions would be fraught with difficulty, especially if the private company were not seen to be delivering value, or if excessive profits were made.

4. What is the answer?

Our answer to the “problem” of encouraging private investment into the UK strategic road network is simple: we believe that for new road infrastructure there is no solution that can adequately reward investors while providing good value for the taxpayer.

We also question the imperative to find a way to fund big new road links when there is a wealth of evidence and opinion to support the view that a greater number of small projects, including high quality maintenance, can provide far better outcomes for the economy and congestion at a much lower cost than large road projects.

Instead of finding ways to privatise and expand the road network, we propose two complementary alternative approaches:

Channel private money into public transport infrastructure

Private investment from pension, insurance and sovereign wealth funds should be channelled towards public transport where there are clear opportunities and revenue streams.

Fix it first

For the maximum benefit for motorists and the best value for taxpayers, public road spending should be refocused on enhanced maintenance of the existing network, including local roads.

A) Channel private money into public transport infrastructure

For the maximum benefit for pension funds and other investors, private investment platforms should focus on public transport and related infrastructure.

Public transport and complementary projects, such as railfreight terminals and transit-oriented development around railway stations, have much more readily identifiable revenue streams than new roads and can provide better returns for investors. These returns would also come with fewer guarantees and costs to the public purse.

There are many opportunities in these areas, including:

Station investments

Campaign for Better Transport has previously explored how private funds could be unlocked to gain new transport interchanges, and how new stations, re-openings and refurbishments could also be packaged to include retail and housing developments in and around transport hubs²⁰.

Railway line re-openings

Campaign for Better Transport has made the case for the stimulus value of new railway lines in its report *Reopening Railways – the case for growing the rail network and how it can be achieved* published in July 2012²¹. This proposed a number of measures to promote new or reopened lines and stations to match growing demand and help relieve rail overcrowding and road congestion.

The report calls on the Government to use the next round of investment in the rail industry to:

- Introduce a Community Connections Fund to support new/reopened rail lines and stations
- Support private sector-led reopenings, such as that proposed for Tavistock in Devon
- Establish a reopenings support unit in the rail industry, led by Network Rail
- Safeguard through the planning system the routes of old railways for future reopenings

Many re-opened railway lines have seen passenger demand exceeding original projections. For instance, trains on the Edinburgh to Bathgate line, which was reopened in 1986, now carry four times as many passengers as predicted; and the Ebbw Vale to Cardiff line, reopened in 2008, now carries 1 million passengers a year, 600,000 more than projected²¹.

Light rail, tram and bus rapid transit investments

Several projects are already underway with Government funding and smaller contributions or levies from private developers and businesses, including in Sheffield, Nottingham and Bristol. For these modes, operator fees and fares provide clear

revenue streams, and funding is also being provided in Nottingham through a Workplace Parking Levy.

B) Fix it first

For the maximum benefit for motorists and the best value for taxpayers, public road spending should be refocused on enhanced maintenance of the existing network, including local roads.

An additional economic problem with new road projects, which has in part led to the current exploration of private funding, is that each one is enormously expensive. For a given investment, construction jobs are only provided in small areas of the country for a limited period, making the economic benefits seem irrelevant to most of the population.

IPPR North highlighted this problem when they analysed the National Infrastructure Plan and other announcements made in the Autumn Statement in 2011. They suggested that the plan's focus on large projects in the south and south east of England was not in the best interests of the UK's economy as a whole, saying²²:

“Recovery from this unprecedented economic crisis will depend upon economic growth in so-called lagging regions; without it, the apparent welfare burden on the South will grow and grow, as will its own dependency on publicly-funded infrastructure investment. If the chancellor wishes to carry these infrastructure announcements into the next spending review, a much better case must be made as to how they are in the national economic interest and not simply in local interests.”

One way to mitigate this problem while maximising the stimulus value of investment in the road network, would be to refocus the investment priorities of the HA on maintenance and repair projects for the whole of the next spending review period.

We therefore propose the adoption of a complete hiatus in large-scale road building and widening projects funded by central government, focusing

spending priorities from 2015 entirely on maintenance, and on projects to repair bridges, tunnels, under- and overpasses and junctions at genuine pinch-points.

A large body of evidence, most notably from the USA (see box on this page) shows that maintenance and repair would be likely to provide high value for money, would provide more jobs more quickly than new roads, and that these jobs would in a more dispersed geographical pattern. Compared with new roads, these projects also save more carbon and provide more savings to drivers and businesses for repairs.

A focus on repairing existing infrastructure is also supported by data on large projects from the UK. The DfT's recent "Development Pool" group of local authority major transport schemes illustrate's well the difference between new capacity and maintenance work.

Table 1 compares value for money and carbon data for maintenance projects and new roads. The scatter plot in Figure 4 includes every project in the pool and shows that three major bridge and overpass repair projects were by far the best value and lowest carbon when assessed by the DfT's appraisal process. In contrast, new 'link roads' and bypasses were found to have very poor carbon figures and much lower benefit-cost ratios (BCRs)²⁶.

Evidence from the USA

Studies carried out before and after the 2010 American Recovery and Reinvestment Act (ARRA), provide strong evidence that repair and maintenance projects have greater stimulus value than new roads.

A 2009 review of the economic impact of transport spending showed that public transport infrastructure generated 31 per cent more jobs per dollar spent than new road and bridge capacity, and that repair and maintenance of roads generated 16 per cent more jobs per dollar than new construction²³.

After the first year of ARRA spending, Smart Growth America conducted a review of the stimulus effects of different projects. It found that an ARRA dollar spent on public transport was yielding 70% more job hours than one spent on highways²⁴.

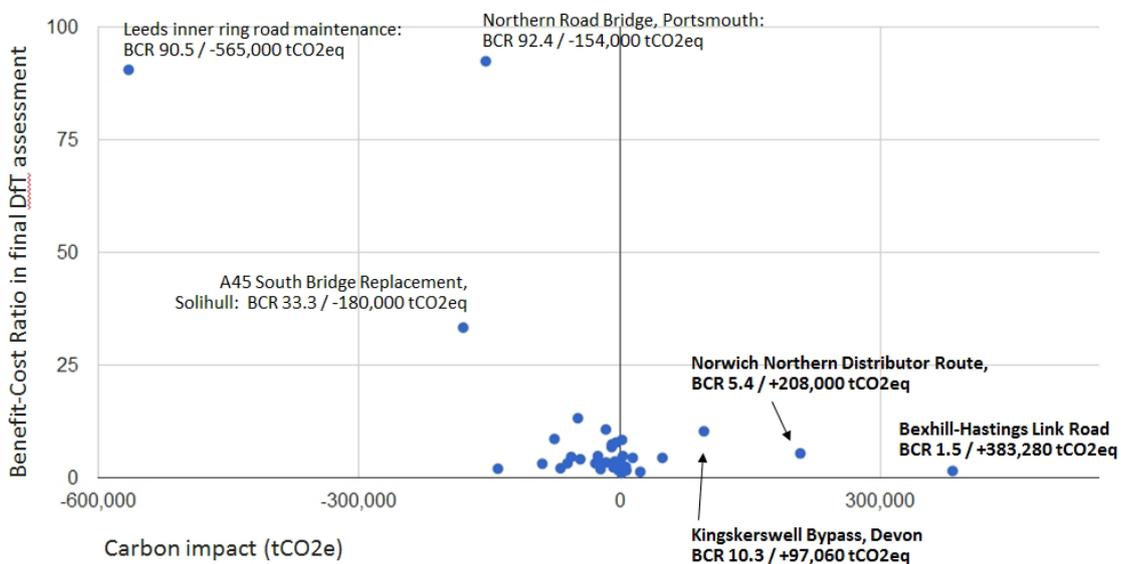
This and other research associated with stimulus spending in the United States also shows that enhanced maintenance of road infrastructure has excellent growth credentials because it^{23,25}:

- Saves drivers money in car repairs
- Makes the best use of surplus labour, being distributed across the whole country
- Starts spending project funds more quickly than capital projects
- Is more labour-intensive, spending less money on land and equipment (which have less reinvestment value for the economy as a whole)



TABLE 1: Development Pool data	Benefit-cost ratio (BCR) in final DfT assessment	Carbon impact (either 60 or 15 year assessment) tCO ₂ eq
Average for Development Pool	9.1	-20,554
Average for 5 maintenance projects	47.4	-190,200
Average for 13 bypasses/link/ring roads	5.1	+48,963
Average for the 3 large road projects highlighted in the chart	5.7	+229,447

Figure 4: Development Pool schemes: value for money and carbon impact



Priorities for stimulus spending and the next spending review period

The evidence strongly suggests that more maintenance and repair projects should be sought out for development as the priority for the next spending review period at the DfT and HA, and by local authorities via the proposed new Local Transport Boards and consortia.

These projects should be combined with enhanced upgrading of the standard of the existing network, including improvements to crossings and facilities for non-motorised users such as pedestrians and cyclists.

The latter facilities are needed for urban trunk roads, and in rural areas where active travel initiatives can be enhanced by measures to reduce the severance and deterrence effect of large roads.

Other improvements that could be targeted for major project spending include the removal of level crossings from local roads, which would have significant benefits for everyday road users, including pedestrians and cyclists, and would enable more efficient rail movements for passengers and freight.

Some reallocation of spending from new build to maintenance has already occurred within the HA and

approximately £200 million of additional emergency repair funding has been provided to local authorities as a result of harsh Winters. However, much more can be done.

A first step could be reversing two sets of measures that were introduced by the DfT as part of the 2010 Spending Review.

These were:

- A reduction in road condition standards and specifications, to meet only minimum legal obligations for safety and serviceability
- A cut to routine maintenance budgets for trunk and local authority roads, including a £672 million cut in planned maintenance of national highways over the four-year period

The National Audit Office (NAO) report *Reducing costs in the Department for Transport*²⁷ noted in December 2011 that savings resulting from these measures were likely to be false economies, and warned that:

“Reducing maintenance may lead to a deterioration in road quality and so increase costs in the longer term.”

At the time of the Spending Review, the DfT also warned of this possibility in its submission to the Treasury, saying that²⁷: *“reductions will lead to planned and managed, but nevertheless obvious, deterioration in the network”*.

The NAO report also contained evidence from the HA of the benefit-cost ratio of maintenance and renewal work, and found that the benefits were ten times higher than the costs – a very high level of value for money, which only two of the Development Pool roads and bypasses were able to reach.

The Federation of Small Businesses (FSB) has found strong support among its members for long-term maintenance of local roads to be given a higher priority. Its 2011 survey saw three in five small businesses reporting that the state of repair of their local roads had impacted negatively on their

business²⁸. With small firms typically operating on local roads within a 40 mile radius, improving the condition of the local road network could do a lot to help this crucial sector of the economy.

The FSB also produced an accompanying report *Small Business and Infrastructure: Transport* which emphasised the need for maintenance and a focus on local roads, calling for the Government to²⁸:

“Take into account the importance of all categories of road for small businesses when allocating future funding across the network.”

The DfT-commissioned *Potholes Review* published in April 2012²⁹, made a number of recommendations for the prioritisation and management of road repairs, but stopped short of recommending higher funding levels. However, the review did note that polls show a high level of public concern about the condition of roads. A 2011 poll by Ipsos MORI³⁰ showed that the condition of roads and pavements was the second most urgent transport problem people experienced, with nearly twice as many citing this factor compared with congestion (44% vs 24%). This suggests that such a policy switch would be popular, in addition to being strongly backed by evidence.

Conclusion

This report has shown that the Government appears to be testing out a very wide range of options for getting private sector funding into new roads, including the privatisation of the strategic road network. It demonstrates that none of the proposed methods allow this to be done in a way that is fair to road users, taxpayers and financial institutions.

The emerging proposals will not help motorists or other road users, risk costing taxpayers dearly while mortgaging future tax receipts to the private sector, and potentially also lead to serious risks for investors.

Instead, we advocate a focus on maintaining and repairing the roads we have, locally and nationally, and pushing investment towards railway stations and other less risky transport projects.

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Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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