

The Mersey Gateway Public Inquiry 2009

PROOF OF EVIDENCE OF NATIONAL ALLIANCE AGAINST TOLLS

(Web version – changes to links)

Introduction

1. This proof of evidence is from John McGoldrick, Coordinator for the National Alliance Against Tolls (NAAT), I have also been involved with the Runcorn crossing as Secretary of the Mersey Tunnels Users Association (MTUA). For this “Mersey Gateway” Inquiry, the NAAT submitted a detailed statement of case in November 2008 and an addendum in March 2009.
2. The NAAT was formed in 2004 by groups protesting against existing tolls in England, Scotland and Wales. One of those groups was the MTUA which was formed in 2003 to oppose plans for toll increases and a new tolling regime on the Mersey Tunnels.
3. The MTUA and the NAAT are unfunded organisations trying to oppose plans that have been prepared and promoted using millions of public money. We do not have the same level of expertise as those who have been employed to produce these plans but we believe that most people agree with our aims.
4. As the Government have been involved with this scheme and have supported and helped to finance its development, it may already know what it intends to do, but this Inquiry may at least be an opportunity for the public to become aware of the facts.

Background to our interest in the scheme

5. The MTUA initially became interested in the Runcorn bridge and some other crossings (tolled and untolled) around Britain because it wanted to do a comparison with the Mersey Tunnels. It later became interested in the plans for what was then called a “New Mersey Crossing”.

6. The "Mersey Crossing Group" was formed in 1995 "to promote a new Mersey crossing and to guide the development of the project" (Halton Council website). The operators of the Mersey Tunnels – the Merseyside Passenger Transport Authority usually referred to as Merseytravel – became a member of the group in 2001. The inclusion of Merseytravel in the Group seemed odd as they would want any new crossing to be built as far upriver as possible and / or to be tolled. There is still a page on Merseytravel's website, which goes back to 2001, it mentions the proposal to build a new bridge at Runcorn and says that it will "*be paid for by tolling*"¹. In 2003 counsel for Merseytravel made a similar statement to the Mersey Tunnels Opposed Bills Committee – "that bridge itself will be tolled in any event in all likelihood"².

7. In 2001 (1st November) - Halton Council's Executive Board had agreed to support a Private Bill promoted by Merseytravel which would have the effect of perpetuating and increasing the Mersey Tunnel tolls. This support by the Council was referred to in 2002 by the MP who was sponsoring the Bill ³. If Halton Council were opposed to tolls then it seemed odd that they did not oppose the Bill as if it became law (which it did in 2004) then it not only increased the chances that the Government would expect that a new bridge at Runcorn would be tolled, it increased the benchmark as to how much any bridge tolls would be.

8. From the minutes of the November 2001 Halton Council Executive Board meeting it seems that they supported the Mersey Tunnels Bill because without it "there was a possibility of a significant reduction in Mersey Tunnel tolls that would increase the use of the Tunnel crossing and the economic case for a new crossing (at Runcorn) could be seriously jeopardised. The uncertainty could also adversely affect the attractiveness of the New Crossing Project to private investors" ⁴. So it seems that as far back as 2001, the object of building a new private bridge was

¹ <http://tolls.merseytravel.gov.uk/misunder.html>

² <http://www.parliament.the-stationery-office.co.uk/pa/ld200203/ldselect/ldmersey/3013015.htm> para 265

³ [http://www.publications.parliament.uk/cgi-](http://www.publications.parliament.uk/cgi-bin/newhtml_h1?DB=semukparl&STEMMER=en&WORDS=mersey%20cross&ALL=mersey%20crossing&ANY=&PHRASE=&CATEGORIES=&SIMPLE=&SPEAKER=&COLOUR=red&STYLE=s&ANCHOR=21023-20_spnew9&URL=/pa/cm200102/cmhansrd/vo021023/debtext/21023-20.htm#21023-20_spnew9)

[bin/newhtml_h1?DB=semukparl&STEMMER=en&WORDS=mersey%20cross&ALL=mersey%20crossing&ANY=&PHRASE=&CATEGORIES=&SIMPLE=&SPEAKER=&COLOUR=red&STYLE=s&ANCHOR=21023-20_spnew9&URL=/pa/cm200102/cmhansrd/vo021023/debtext/21023-20.htm#21023-20_spnew9](http://www.publications.parliament.uk/cgi-bin/newhtml_h1?DB=semukparl&STEMMER=en&WORDS=mersey%20cross&ALL=mersey%20crossing&ANY=&PHRASE=&CATEGORIES=&SIMPLE=&SPEAKER=&COLOUR=red&STYLE=s&ANCHOR=21023-20_spnew9&URL=/pa/cm200102/cmhansrd/vo021023/debtext/21023-20.htm#21023-20_spnew9) Column 334

⁴ (NAAT03A) [http://www.halton.gov.uk/committeeminutes/Board%202001-](http://www.halton.gov.uk/committeeminutes/Board%202001-2002/Executive%20Board%5C1%20November%202001%5CMinutes%5CMinutes.doc)

[2002/Executive%20Board%5C1%20November%202001%5CMinutes%5CMinutes.doc](http://www.halton.gov.uk/committeeminutes/Board%202001-2002/Executive%20Board%5C1%20November%202001%5CMinutes%5CMinutes.doc) scroll down to EXB392

more important to the Council than relieving congestion on the existing Runcorn bridge.

9. The MTUA were not at the time aware of the above Executive Board resolution, otherwise we would not have been so naive as to ask at the end of November 2003 - "are Halton Council pressing for bridge to be tolled or to be not tolled?". The reply on the 1st December was that "there are presently no plans for tolls on the new crossing".
10. The MTUA also became interested in the economic case for a new bridge and at the end of 2003 asked some questions of Halton Council and Peter Stoney of Liverpool University who had carried out the 1998 economic study. Early in 2004 we obtained from Gifford a copy of the "Economic Impact Assessment" completed by Amion in July 2003, and as it was not explicit in the report, Gifford confirmed to us (16th Feb 2004) that the "assessment was based on the assumption that the new crossing will not be tolled". Early in 2005 we also obtained from Gifford a copy of the "Wider Economic Impacts " report completed by Amion in November 2004.
11. At the end of 2004 Halton Council revealed that it had asked the Government for a new tolled bridge. It became apparent during early 2005 that the scheme involved largely closing the existing bridge and putting a toll on it as well as the new crossing. The Government delayed giving a decision on the Halton Council application and it was not till March 2006 that the Government announced that it had "approved the scheme for entry into the programme of major schemes and agreed Government funding of £209 million".
12. After initial queries to the Department for Transport, in May 2006 the MTUA asked Halton Council which powers they intended to use to toll the existing and proposed bridges. The answer was not clear. In any case we had formed the view that the Council had not been open about the plans for tolling of the bridges. So in June 2006 the MTUA made a Freedom of Information Act request for communications that the Council had that dealt with tolling. The attempt to get that information has been protracted and there have been later requests for information which are not yet fully resolved.

Why NAAT oppose Tolls in general

13. "Tolls" is derived from the Greek word "telos" meaning "tax". They have been around for a long time and were mentioned as "evil" in Magna Carta. More recently (1780s) Adam Smith dealt with the issue of tolls in the ". Wealth of Nations" where he said that "Whatever exigency of the state therefore this tax might be intended to supply, that exigency would be chiefly supplied at the expense of the poor, not the rich; at the expense of those who are least able to supply it, not of those who are most able." (Book V Chapter II). We must admit that many modern economists though followers of Adam Smith in other things advocate charging everyone, including the poor, for everything – even for breathing clean air!
14. In the days of Adam Smith there were a lot of tolled bridges and many tolled roads or "turnpikes" but they were generally hated and nearly all tolls were removed in the late 1800s. It is often implied that despite Britain being almost toll free by 1900 the policy of this and previous post 1945 Governments has been to revert to tolling of roads and river crossings. It is certainly the case that many politicians have and do want this, but there is no explicit policy.
15. An obvious example of there being no such policy is the existing Runcorn bridge which when it was completed in early 1961 had the third longest steel arch span in the world and the longest vehicular span in the country and was not tolled. When the bridge was widened in the 1970s it was still not tolled.
16. Neither of course has the rest of Britain seen a sprouting of toll booths and barriers. There are still almost no tolled roads in Britain. There are admittedly more tolled river crossings, but of the about 100 road crossings of tidal waters in Britain, only 9 are tolled ⁵. And of the many thousands of non-tidal crossings, only 8 are tolled.
17. Whether you have to pay tolls is a lottery depending on where you live and work, which is unfair to those drivers who have to use the tolled crossings. As the

⁵ <http://notolls.org.uk/cross.htm> full list of tolled and untolled crossings on NAAT website

Government collects about £50 billion a year in taxes on roads use ⁶, and only spends a small fraction of this on roads, it is an extortion for this Government to refuse to pay for an adequate road system and for the authorities to accept and repeat the mantra that “there is no alternative” and that the only choice is a tolled crossing or no crossing.

18. Tolls are a regressive tax. A poor person pays the same toll as a rich person. The driver of a small car pays the same as the driver of a large car.
19. Toll roads cast a blight and inhibit economic activity in the areas where they are situated. Businesses where road transport is important will prefer to locate elsewhere, partly because of the reduced numbers of shoppers and tourists but also because of the additional transport costs for some businesses and the extra potential cost to employees of travelling to work. Tolls reduce positive agglomeration benefits and a business located in a tolled area has a smaller economic hinterland than a similar business in a toll free area.
20. Tolls reduce the effective capacity of a road or crossing because they deter use (particularly off-peak) and disrupt a smooth traffic flow because of lane changes at toll points. The actual toll collection also causes delays and queues, and tends to prolong congestion periods as traffic is on the road longer than it would otherwise be. Electronic tolling reduces but does not remove these delays, and where there is a mix of cash and electronic tolls than there is an increased risk of accidents and problems caused by the apparent failure of the microwave RFID tags.
21. To the extent that there is a choice, drivers will tend to avoid toll crossings and use other roads. This means longer journeys, more fuel consumption, more vehicle emissions and possibly use of less suitable, less safe and more congested roads.
22. In our view roads are an essential feature of a successful economy and a free state. Movement on the roads should not be impeded or discouraged by barriers or tolls.

⁶ <http://notolls.org.uk/figures.htm#taxes> Taxes on roads users from NAAT site

Consultation and people's views

23. At various stages the Council have gone through what they called "consultation" exercises. In our view this was just part of the process to sell to local people what had already been decided. As well as their in house "Communications and Marketing Team", the Council have used 2 external PR firms – "DTW" and "Politics International", to "encourage local people to register their support for the new crossing" (DTW website) and to "elicit the active support of key stakeholder groups (including local businesses, MPs, MEPs, civil service officials, trade unions, local authorities and the media) for it" (Politics International website).
24. The "first consultation" took place in September and October 2002 using "focus group discussions with residents, interviews with businesses, telephone surveys and street surveys". One result was that "Three quarters of respondents at that time advised that they would consider travelling via alternative routes that, although they would increase journey times, would avoid road tolling." (CD/8 "Statement of Community Involvement" by GVA Grimley March 2008 - Main Text - para 4.4) This result seems to have had no effect on the tolling plans that the Council were developing.
25. The "second consultation" took place between June and October 2007, by this time it was not a secret that the scheme probably meant some tolling and the consultation did not give "no tolls" as an option - "The first of these questions asked respondents about the tolling regime: Both crossings will be tolled.." (Para 2.3.6 of Appendix 8).
26. One finding from the second consultation was that "With regard to social segregation, issues were identified in association with the local communities by the new infrastructure or the imposing of a tolling system. It was assumed by the majority of respondents that the Project would encourage segregation between Widnes and Runcorn residents." (same report 5.37). We assume that it was the tolling which would segregate Widnes from Runcorn and not the new bridge!
27. Some of the other points made by GVA Grimley in the Main text of the "Statement of Community Involvement" were –

"Many respondents felt that it was unfair to toll residents in addition to other financial costs involved with owning a car or living in Halton." Para 5.54.

"Several respondents said that the cost of the tolls was particularly pertinent for residents in Halton due to the typically low income in the area..." Para 5.55.

"The design of the tolling system was raised by many respondents as a further concern. ... This included concerns that the tolling system would greatly increase congestion on the bridges and surrounding area, and have a detrimental impact upon local services including the emergency services." Para 5.58. - As there are currently no tolls in Halton, this impression of Halton residents that tolling would increase congestion is presumably based on their experience of toll queues elsewhere including at the Mersey Tunnels toll booths.

"Issues surrounding the tolling of both bridges were subsequently raised by many respondents and concerns about the impact of the tolls on social segregation within the area were also raised. A small group of respondents showed their support for tolling, and understood the need for this approach to be introduced." Para 5.59. - We assume that the Council were pleased with this "small" group!

28. Another important area where the Council have ignored the second "consultation" is on the planned impairment of the existing bridge. Unlike tolling the Council actually gave surveyees a choice – "The most popular choice (60% of responses) was to "retain as it is"." Para 5.94. Given that those surveyed may have been subjected to Council propaganda before answering the question, this probably understates the likely opposition, particularly if people were aware of all the consequences including that the bulk of the traffic would as a result of the impairment use the Central Expressway rather than a peripheral road.

29. Appendix 8 (Factual Report on Public Consultation) at 4.4.8 to 4.4.20 also gives some examples of comments about tolling received from the "general public" during the consultation, here are some –

"To toll the Mersey Gateway and the SJB would be very, very unfair on regular and local users."

"Tolling local people to use the bridge is out of order."

"People living in Runcorn and Widnes should be able to use the SJB free."

"Local people should have badge/permit to cross for free. We should not have to pay."

"We pay enough taxes to pay for this bridge. There should be no toll on it."

"Totally disagree with tolling when the cost of motoring is already very expensive."

"Why are the bridges to be tolled? This can cause financial hardship for regular users who live in Halton."

"Halton is a very financially poor area and a toll is going to be a tax on visiting friends and family."

"Pensioners cannot afford tolls! Passage should be free to all over 65, especially as they grow older, 70 and 80. These groups represent the poorest in our society and are deserving of special consideration!"

"Are any of the London bridges tolled?"

"I strongly object to tolling of the SJB on top of road tax, petrol tax, etc considering the number of untaxed crossings of the Thames and other city river crossings in the country."

"Why should local people have to pay to cross the bridge? How many bridges are tolled across the Thames or the Tyne - not many!"

"If these businesses are to stay and thrive (and continue to provide valuable jobs locally), they must receive a heavy discounted toll to remain viable and

profitable. Otherwise, many would have no choice but to relocate out of the area, taking jobs with them."

"The day you start charging to cross the bridge(s) is the day this household will stop shopping in Widnes, St Helens and Speke areas."

"There is already a reluctance between locals to use facilities on either side of the river, and I am sure paying toll will deter them."

"Bridge should be funded out of taxes paid by motorists."

"We are very worried about toll charges. We now have to go to Warrington hospital for all operations and serious illnesses. This will cause added travel time and costs to an already expensive and stressful time."

"If Widnes and Runcorn is one Borough, it's classed as one town. How can you charge for a toll bridge within a town?"

30. The Appendix also says (4.4.19) "Despite feelings of anxiety, a small group of respondents illustrated **support for the tolling regime** and understand that it is needed." (The emphasis is as in the report.) Apparently bad marks for those who failed to understand what was expected of them! Some of the toll supporters were enthusiastic - "I think the issue for tolling is a great idea."

31. That these enthusiasts seem to have been in a minority is indicated in the Appendix Summary at 5.1.2 - "Tolling was the most frequent topic discussed by the general public, across all forms of communication method. Whilst it is clear that local residents expect to have discounted travel across the bridge, it was also felt that regular users should receive priority. Furthermore, it was also agreed by much of the sample that it would be inappropriate to toll the Silver Jubilee Bridge."

32. The importance to people of tolling is also apparent from the Main Text - "Tolling was the most frequent topic raised by the general public across all forms of communication...." Para 5.77

“Road tolling represented the most common concern raised by the public, and comprised the first of two closed questions in the questionnaire...” Para 5.92. – (This “closed” question did not give a “no tolls” option, only a choice between the same toll for all users or various discount schemes.)

33. Appendix 10 “Public Consultation Progress” says of the public exhibitions in the summer of 2007 – “At these exhibitions the main issue has been tolling, with the principal view that locals should not have to pay tolls.”
34. Almost all these consultation responses were presumably from people living in Halton. If those from outside Halton, who are a large part of the bridge users, had been asked they would have said that no one should have to pay tolls.
35. In May 2008 the Council issued the statutory notices for the tolling and other Orders, but the various leaflets issued by the Council did not appear to clearly draw to people’s attention that they could make formal objections to the intention to toll the bridges. There was a letter sent out in June 2008 by solicitors on behalf of the Council, the letter did refer to the right to raise an objection, but we do not know how many people that letter was sent to. The Council also put some of the information on its website, but they initially seemed to be pdf files without the appropriate suffix and most people would not have been able to open them.
36. Given that is the first time in Britain that a toll will have been put on a free bridge, and that Halton will be the only local authority in Britain that is completely split in two by tolls one might have expected that there would have been a significant number of objections submitted to the plans. But we understand that there were not many objections (we have asked how many, but have not been given an answer) and of the statements of case submitted last November for the Inquiry only about twelve included any concern at all about any aspect of the tolls (two parish councils, Friends of the Earth, Transport Activists Roundtable, ourselves, six firms and one individual).
37. In our view there is massive opposition to tolls around Britain as evidenced by the 1.8 million people who signed a petition to the Prime Minister against “road pricing” and the massive defeats in local polls on “congestion charge” plans in Edinburgh and Manchester. (In London, the official “consultation” also showed

that the majority were opposed to the “congestion charge” and to its later extension, but the then Mayor went ahead anyway.) This opposition is usually not reflected in official objections to tolls. One reason for this is “learned helplessness” – people have been conditioned by decades of experience to believe that the authorities always win.

38. Another reason for a scarcity of objections in this particular case may be that people and businesses in Halton have been lulled by statements from the Council saying that their aim was that those living in the Halton Council area would not pay any toll or that failing that they would receive a substantial discount e.g. the Leader of the Council quoted on Runcorn & Widnes World on 20 June 2007 – “We're not giving up on a free scheme on the Silver Jubilee Bridge for locals, or at least a hefty discount.”⁷.
39. The Council have submitted various letters from local authorities, police authorities etc indicating support for their plans. What is not always clear is whether it was a democratic decision with all the members of the authority formally considering the plans, and if they did then what information was available to them to make a proper decision.
40. Residents and businesses located within the borough and without may also have not been fully aware of what the plans are, and the Council in our view has made potentially negative information difficult for the average person to find.
41. Though Halton Council has gradually released information that would stretch from Runcorn to the Moon, it has until recently been difficult to access that information and the vast majority of Halton residents and businesses will not be conscious of its existence. The information on the website for the new Crossing has not been comprehensive and has been difficult to access.
42. What we regard as important information about the effect of tolls and overall traffic flow has been as difficult to find as a needle in a haystack in either the deposited documents or in what was on the web. To the extent that we have made direct requests for information it has been difficult to get what we wanted.

⁷ <http://notolls.org.uk/pdfs/runcorninquirytaato4a.pdf>

43. Some of our experience in trying to obtain information was detailed in the Addendum that we submitted in March. Since then the Council has released some of the requested information or has indicated where it was available, but some of it is still unresolved. The case that eventually followed on from our Freedom of Information Act request in June 2006 for communications that the Council had that dealt with tolling is with the Information Tribunal.
44. As an example of a very recent information query, we were interested in the forecast income, expenditure and surplus for each year, and the assumptions that went into the forecasts. This is in our view basic and essential information, yet we have not been able to find any of this in the documents on the Mersey Gateway site or among those further documents now added to the Inquiry web site. I believed that I had seen some part of this in one of the many paper documents deposited at Halton Lea. It seems that the Council were not aware of any such document and I have now had to request them to supply the information wherever it is.

Toll Income

45. The Tolls income expected from this scheme is like other information that we consider to be crucial almost totally hidden in the masses of paper that the Council have produced. They quote a figure of £618,228 thousand in the Amion "Mersey Gateway Wider Economic Impact Report" (Feb 2009) (CD/200) but this is under the heading of User charges in "TUBA Benefits (2002 discounted prices)", which lacks some clarity.
46. Even if someone stumbled across the £618 million figure it seems to give a misleading impression of what users will have to pay. Some clue as to that is buried elsewhere in an unexpected place, i.e. in the "Traffic Forecasting Report Volume 2: Tables and Figures Jan 2009" (CD/197 – you need to skip volume 1). This gives on page 139 ⁸ the expected toll income figures for each year from 2015 to 2030 split between the two bridges and analysed over cars, "LGV" and "OGV" at November 2006 prices and net of electronic tag discounts but before any other discounts. ("LGV" is now the standard EU term for "Large Goods Vehicles" replacing the term "HGV" or "Heavy Goods Vehicles", "OGV" is usually a substitute for "LGV", it seems that "LGV" has been used here to mean "Light" rather than "Large", the standard EU term for light vehicles is "LCV" or "Light Commercial Vehicle".) There is a brief explanation of the forecast on page 7–8 ⁹.
47. The figures are not totalled, but we have done this and made some other projections based on the Council figures (see attached ¹⁰).
48. For the period 2015 to 2030 we published toll income adds to £647 million (£540 million for the new bridge and £134 million for the existing bridge).
49. If extended for the full 30 years assuming an annual traffic growth rate of 1.5% then the total toll revenue is £1.4 billion at November 2006 prices.
50. If in fact tolls are increased as per the Draft Order at the rate of RPI plus one percent, and RPI increase is zero for the whole period from 2006 to 2044, then

⁸ <http://notolls.org.uk/pdfs/runcorninquirytaato5a.pdf>

⁹ <http://notolls.org.uk/pdfs/runcorninquirytaato6a.pdf>

¹⁰ <http://notolls.org.uk/pdfs/runcorninquirytaato7a.pdf>

the tolls paid by drivers and businesses will amount to nearly £1.7 billion. But if RPI is assumed to increase by 3% a year the tolls will be £3.1 billion.

51. It appears that the tolls income forecast by the Council on which we have based the other figures assumes that the starting toll will be about the same as that which currently applies on the Mersey Tunnels. The toll for a car is currently £1.60 per the last Mersey Tunnels Toll Order, but due to the local economic circumstances the toll has been frozen till April 2010 at the old rate of £1.40 or £1.25 for those who have a "tag" (these are for cars, tolls for lorries can be up to four times the car rate). The draft Runcorn Toll Orders specify a toll rate for cars of £1.00 to £2.50 as at 2008 prices. If the toll was to be more towards the top end of the range in the draft order then the income might be even higher than £3.1 billion though this is probably unlikely as at higher toll prices, the tolls income would quite likely fall as even more drivers stopped using the crossing and more people and businesses moved away.

Tolling of a previously untolled highway

52. The power to toll any highway (including river crossings) was brought in by the Transport Act 2000. There was similar but separate legislation for London – used to bring in the “Congestion charge” and Scotland – not used. Though the 2000 Act toll powers are nearly nine years old there have only been two uses of them - the Durham “Congestion charge” and the Dartford Toll. The Durham charge applies to one street which is not a river crossing. The Dartford toll is on a river crossing, but is in effect a device used by the Government to enable the continued tolling of a crossing where otherwise the tolls would have had to stop. The tolling of the existing Runcorn bridge is as far as we know the first time, since at least the end of serfdom in Britain, that a toll has been put on a previously free bridge.
53. The reason given for tolling the existing bridge is that the proponents of the planned new crossing believe that otherwise there would be little use made of their new bridge - “As the new bridge will be subject to tolls, the Silver Jubilee Bridge must also be subject to tolls. This is because if the new bridge alone were subject to tolls, traffic would be more likely to use the Silver Jubilee Bridge, even if it were reconfigured to take a lower traffic capacity.” (Para 5.5. of the “Toll and Road User Charges Explanation” CD/22 Item 8).
54. This reason for tolling is also without precedent; we are not aware of any other toll which has been put in place to protect a tolled alternative. The proposal is the equivalent of proposing say the building of a new school or hospital or park or library etc to fill an identified need and then not only charging for the new facility but also putting a charge on the existing school or hospital or park or library etc to make sure that the new facility gets some customers.
55. The Council has sought to give the impression that tolling is normal. For instance in the special edition of the Mersey Crossing newsletter of November 2004 ¹¹ they list nine “Existing tolled crossings” (Humber Bridge, Liverpool Tunnels, M25 Dartford Crossing, Second Severn Crossing, Forth Road Bridge, Erskine Bridge,

¹¹ (NAAT08A) <http://www.merseycrossing.co.uk/html/news/5258%20Mersey%20Newsletter%20ED4.pdf>

Skye Bridge, Tay Bridge, Tyne Tunnel) and two "Proposed tolled crossings" (Thames Gateway, 3rd Forth Road Bridge).

56. Of the nine listed tolled crossings, four are now free. Of the two proposed tolled crossings, the Scottish Government reiterated in September 2008 ¹² that a new Forth Road bridge will not be tolled, and it was announced on the 6th November 2008 that the Thames "Gateway" scheme had been abandoned.

57. The existing bridge at Runcorn was built between 1958 and 1961 at a total cost of just under £3 million (£2.7million). This was funded by means of a 75% Ministry of Transport grant with the remaining 25% being met mainly by Cheshire & Lancashire County Councils. Cheshire were responsible for maintenance of the bridge till 1998, when Halton took over. To now put a toll on this bridge is particularly unjust for those living in Cheshire and Lancashire and is the equivalent of enclosing the Commons land and then charging a rent to use it.

Change in law affecting tolling of the existing bridge at Runcorn

58. The existing bridge is being tolled using powers in the Transport Act 2000. That Act was amended by the Local Transport Act 2008. The NAAT made a submission in September 2007 to the consultation on the new Act when it was a draft bill, and followed what later happened. We were interested in the "road user charging" parts of the Bill including Section 110 which removed the 2000 Act requirement that local authorities needed the approval of the Secretary of State before introducing tolls on any highway, and section 111 which removed the powers for the Secretary of State to direct that an inquiry should be held ¹³.

59. The Act got the Royal assent on the 26th November 2008, but the toll provisions were not to come into force till a Commencement Order was made. The Local Transport Act 2008 (Commencement No. 1 and Transitional Provisions) Order 2009 was made on the 26th January 2009 and the tolling provisions came into force in England on the 9th February 2009.

¹² (NAAT09A) <http://www.pressandjournal.co.uk/Article.aspx/844682?UserKey=>

¹³ (NAAT010A) http://www.opsi.gov.uk/acts/acts2008/ukpga_20080026_en_13#pt6-pb2-l1g110

60. There was however a transitional provision at paragraph 6 of Part Two of Schedule 2 –

“Notwithstanding the coming into force of sections 110 and 111 of the Act, sections 169 and 170 of the TA 2000 (charging schemes) shall continue to apply without the amendments made by sections 110 and 111 in respect of any charging scheme under Part 3 of the TA 2000 which was submitted to the Secretary of State in accordance with section 169 of that Act before 9th February 2009.”¹⁴

61. Halton Council through their contacts with the DfT were presumably at least as aware as we were as to what has been happening since the draft Bill was issued in September 2007, yet they made and submitted a seemingly unnecessary draft tolling Order to the DfT on 5th December 2008. It seems certain that Halton will be the only Council that is affected by the transitional provision, and given that the Government must support what Halton Council intends to do, it raises a question as to what the purpose is of that part of this Inquiry which will deal with the tolling of the existing bridge.

Legality of discounts

62. Presumably in order to restrain possible opposition, the Council has been saying that bridge users who are “locals” will either not pay or will get a substantial discount, (though they have also said that they can not say exactly what this discount will be).

63. There are as far as I know only two such discount schemes at the moment. One is the London Congestion Charge, but that is not really comparable as it is a discount not for “locals” but for people who live within the charge zone. The other is the Dartford scheme that was introduced from 15th November 2008, whereby residents of the local authorities immediately either side of the bridge can get a discount. That scheme is comparable to what may happen in Runcorn, and it has not so far been challenged. But it is quite possible it will be challenged either here or in the European Court of Human Rights .

¹⁴ (NAAT011A) http://www.opsi.gov.uk/si/si2009/uksi_20090107_en_2

Doubt over legality of Tolling the planned bridge at Runcorn

64. The tolling of a highway whether the land is publicly or privately owned is generally against Common Law. There are two minor toll roads that were permitted by Royal Charters (in 1443 and 1669). All other tolls are the result of Acts of Parliament. In nearly every case the Act is a private act that relates to one particular crossing. A possible reason for this procedure is that tolling is contrary to the general practice and the requirement for specific legislation means that Parliament can have a say on what happens.
65. In the case of the planned new Runcorn bridge there has been no attempt made to get a private act passed, instead two general acts are cited. The draft Order mainly refers to the New Roads and Street Works Act 1991. The powers appear to have been used only twice before. One instance was the M6 Toll Road; the other was the Skye bridge. Campaigners against the tolling of the Skye bridge believed that the tolling was illegal, though for other reasons the tolls were removed at the end of 2004.
66. The preface to the draft The River Mersey (Mersey Gateway Bridge) Order 200[] (CD/10 page 4) says - "An application has been made to the Secretary of State for an Order under sections 3 and 5 of the Transport and Works Act 1992 .." The advertisement of the draft Order does not refer at all to the New Roads and Street Works 1991, it only refers to the Transport and Works Act 1992 (TWA) and says that application for the Order is being made under Section 3(1)(b).
67. So the 1992 Act appears to be crucial for tolling the new Runcorn bridge and according to what the MTUA were told by the DfT in 2006 has only been used once before in connection with the tolling of a road or crossing, that was for the planned second tunnel across the Tyne. In our view the case of the Tyne Tunnel is not the same as there was already specific power for the building and tolling of the second Tunnel in a Private Act - Tyne Tunnel Act 1998 ¹⁵, and that 1998 Act specifically referred to the possible use of the 1992 Act.

¹⁵ (NAAT012A) http://www.opsi.gov.uk/acts/localact1998/ukla_19980001_en_1

68. Though the 1992 Act includes tolling powers it is clearly not for roads or crossings - "An Act to provide for the making of orders relating to, or to matters ancillary to, the construction or operation of railways, tramways, trolley vehicle systems, other guided transport systems and inland waterways, and orders relating to, or to matters ancillary to, works interfering with rights of navigation; to make further provision in relation to railways, tramways, trolley vehicle systems and other guided transport systems; to amend certain enactments relating to harbours; and for connected purposes." (Preamble to TWA 1992 ¹⁶)
69. If MPs had intended that the 1992 Act powers should also apply to roads or river crossings, then they would have been included in the Act's list of facilities that could be tolled and MPs would have mentioned them in the debates on the bill. There is no mention of tolled roads or river crossings in the Hansard reports on the Bill, and its purpose was made clear at the start of the second Reading (Hansard for 2 December 1991 column 39 ¹⁷). In our view citing the 1992 Act as the authority for the Order raises doubts over its validity.
70. This issue was in part the subject of our Freedom of Information Act request that as made in June 2006. Eventually on the 3rd December the Information Commissioner issued a Decision Notice requiring Halton Council to release to us all documents that Halton Council had disclosed to the Information Commissioner but which it had refused to publish. One of the documents was a letter from the DfT dated 27th April 2005 which referred to Halton Council's wish to use the TWA and advised "Indeed, we consider that Halton BC would expose itself to risk of successful challenge if it went down this route." This does not mean that the DfT agreed with our view that the TWA did not apply to the tolling of a bridge, and I understand that Halton Council were able to persuade the DfT that whatever their reservations were that they were groundless. Nevertheless in our view it is quite possible that by using this TWA route, one or other of the parties that object to this scheme on one ground or another will challenge and challenge successfully any decision of the Minister to agree to a TWA Order.

¹⁶ http://www.opsi.gov.uk/acts/acts1992/ukpga_19920042_en_1#Legislation-Preamble TWA Act preamble

¹⁷ (NAAT013A) <http://www.publications.parliament.uk/pa/cm199192/cmhansrd/1991-12-02/Debate-2.html>

Toll and Road User Charges Order and Explanation

71. The draft of the Road User Charging Order (CD/22 item 3) lists various purposes for which the "net proceeds" of the planned tolls on the existing bridge may be used including - at Annex 3, 2 (e) - "in making payments to the Council's general fund for the purpose of directly or indirectly facilitating the achievement of policies relating to public transport in its local transport plan, or for other purposes;".
72. The above provision seems to be based on the Mersey Tunnels toll regime which is far from typical. Elsewhere it is normally the case that any tolls can only be used for the purposes of paying off any construction cost and maintaining the structure during the period it is to be tolled. In our view this provision seems to be an attempt to get even more money from the already overtaxed drivers and businesses who are crossing the river.
73. Halton Council also issued a "Toll and Road User Charges Explanation" (CD/23) in support of their application. The document says (para 4) that - "The purpose of this paper is to explain the mechanism by which the Council would levy tolls and charges under both the proposed Order and the Scheme, including how the level of tolls/charges would be set, and the amount of tolls/charges."
74. The document says at para 6 that the tolls "should be roughly the same as those payable for use of the existing Mersey Tunnels, based on today's figures." But then at para 8 sets out a range of tolls which vary from slightly less than the Mersey Tunnels to nearly twice the charge (and in the case of motorbikes which are not tolled on the Mersey Tunnels says that the toll could be up to £2.50).
75. An explanation for this vagueness as to the level of tolls is given in para 10, which starts - "Ranges are proposed rather than specifying tolls. This is because the Council wishes to preserve flexibility about the amounts of tolls, rather than specifying them now. This will enable it to negotiate with prospective concessionaires so as to achieve the best possible deal for Halton."

76. In our view it is not reasonable to apply for an Order which specifies a range of tolls which for example says that the toll for a goods vehicle could be anywhere between £2 and £5 "class 3" or between £4 and £10 "class 4". It is unprecedented for a Tolls Order to specify a range of tolls, as far as we know all previous Toll Acts and Orders have specified exact tolls, not ranges. It is particularly unreasonable that the reason for the ranges is "to achieve the best possible deal for Halton". Roads are supposed to be a national asset, and it is setting a bad precedent if Halton Council is allowed to set tolls on roads that carry substantial through traffic on the basis of what best suits its area.
77. The Council gives several sub reasons under para 10 including - "10.2 Traffic levels can be predicted up to a point, but absolute certainty will not be gained until the new bridge opens. There is an optimum toll/charge that is attractive to users, so that they do not use other routes. This will be easier to fine-tune nearer to the opening day."
78. On one side of the new crossing is the Mersey Tunnels which are the third most expensive river crossing in Britain. The Council is living in a fantasy world if it believes that a toll level which is potentially higher than the Mersey Tunnels might be "attractive to users". On the other side are the bridges at Warrington and the Thelwell Viaduct which are currently free. Some traffic is bound to divert via those crossings and the higher the charge the more traffic will divert. Unless, that is, the intention of the Government is to toll or disable the remaining free routes, and thus create a virtual Berlin Wall along the line of the Mersey from Liverpool to Manchester.
79. The evidence from the traffic on the M6 Toll road is that there is a small core of roads users who have a high price inelasticity and will continue to use a toll road though the price rises, but that for the vast majority of drivers there is a high price elasticity. The Runcorn tolls will be protected to the west because the operators of the Mersey Tunnels are part of the Mersey Crossing Group and will have a common interest with Halton Council in maintaining as high as possible toll levels to maximise income. But some drivers will have (unless it is blocked) an escape route to the east, and there is therefore a possibility that the traffic levels will be a lot lower than the numbers currently using the untolled Runcorn

bridge, indeed the figures from Halton Council show that their own forecast is for a substantial drop in traffic.

80. At para 13 the Council proposes that tolls can increase over the 30 year concession at a rate of "one percent above retail price index inflation". In the case of most tolled crossings, the toll rates are fixed indefinitely (or until such time as the tolls are removed) and can only be varied by Order. One reason for fixing tolls indefinitely is that the construction cost of any crossing does not increase over time, (though despite this the Mersey Tunnel operators who were supported by Halton Council managed to get such a provision into the Mersey Tunnels Act 2004). In the case of Runcorn it appears that they are aiming to do even better, as at the end of thirty years, even if there had been no movement at all in the RPI, the tolls could be 33% higher. The earlier section in this evidence has indicated the vast amount of tolls that could be collected if these provisions are agreed, they are neither fair nor reasonable.

81. It is normal in a Tolls Act that it anticipates that the tolls are for a limited period, and specifies that the tolls must be removed by a certain date or when certain conditions have been met – typically when the cost of construction of the crossing has been paid off. In the case of the draft Order for the new bridge, there is no mention of the tolls being removed. It seems that the intention is that the tolls will be a permanent ball and chain on people and businesses in the region.

The impairment of the existing bridge at Runcorn

82. The MTUA saw an article about the proposed new Runcorn Crossing in a magazine (Merseyside & North Wales Business Prospect of June 2003). The article said that the new bridge "is predicted to attract over 90% of traffic from the current bridge." As the new bridge was to have the same number of lanes as the existing bridge and the economic assessment implied that most of the traffic wanted a westerly route, this was a very puzzling statement. The MTUA raised this with Halton Council in February 2004, but got no reaction. The mystery was partly explained on 11th January 2005, when Halton Council issued a news release¹⁸ which said - "The Silver Jubilee Bridge would also need to be tolled to prevent overuse .. the intention is to make this a local crossing with .. the four lanes system reduced to two ..."
83. It later became known that this impairment of the existing bridge which takes more traffic than the Mersey Tunnels was to be achieved by not only reducing the number of lanes but also by "delinking" it, i.e. the authorities will make it difficult for traffic from outside of Halton to use it. As explained earlier, the practical capacity will be further reduced by tolling it.
84. One aim of this impairment seems to be that the Council want drivers to use the new bridge. Other things being equal (both crossings tolled or both crossing untolled) it seems that most drivers would continue to use the existing bridge possibly out of habit but also because for most drivers it is a more direct route than the new upriver crossing.
85. Discouraging or preventing traffic from using the existing crossing, has led to some concerns from Runcorn residents about the effects of the extra traffic on the Central Expressway. Their concerns include the resulting deterioration in air quality and road changes that are proposed so that the Central Expressway can carry the extra traffic. These road changes include removing trees, converting the hard shoulder to traffic lanes, taking more land at some points, and alteration to some junctions.

¹⁸ (NAAT014A) <http://www2.halton.gov.uk/content/newsroom/newsarchive/173205>

86. As the Central Expressway goes through the middle of Runcorn these effects are far more significant than would be the case if any extra traffic was on the peripheral roads. Some of the residents have suggested that signage to direct traffic to instead use the Daresbury Expressway and the Weston Point Expressway would help. But apparently this had already been considered by the Council and it had been decided that even if the Council did this it would make little difference as it was now the "sat nav age" and drivers would use the shortest route whatever the signs said.
87. In our view it would be better if a new bridge was four lanes only and the existing bridge was left as four rather than as planned to have a six lane bridge and a two lane bridge. This is the equivalent of putting all your eggs in one basket. There will from time to time be occasions when there are problems with the new bridge or its approaches which will cause partial or complete closure. If that traffic is diverted onto a bridge which has had two lanes removed then it will cause total gridlock over a very wide area.
88. In our view the plans for the existing bridge are perverse and whatever else is decided, it is to the benefit of bridge users and most residents of Runcorn, if the existing bridge is left as it is.

The stifling of traffic

89. When around the end of 2003 the MTUA was enquiring into crossings around Britain, they found that the four lanes on the untolled Runcorn bridge were carrying more traffic than the eight tolled lanes of the Mersey Tunnels. It seems that Halton Council are aware of this as in the Environmental Statement (CD/14 Non Technical Summary) they say that "The percentage of daily traffic that it (the existing bridge) carries in the morning and evening peak hours is almost twice that of any of the Mersey Tunnels" (para 4.2.115).
90. When opposing the Mersey Tunnels Bill, the MTUA used the fact that there was twice as much traffic per lane at Runcorn to counter the claim that tolls were needed on the Mersey Tunnels because they did not have the capacity to cope with the volume of traffic. The MTUA also suggested that the most economic way of providing more capacity for crossing the Mersey, was to remove Tunnels tolls and improve the roads around the exits on the Liverpool side of the Tunnels.
91. Tolled crossings have a reduced capacity due to the disruption of the smooth flow of traffic caused by the fanning out and slowing down at the approach to the toll plaza, and in many cases then stopping at the toll booths, then when traffic is past the toll booths it has to manoeuvre back into the original number of lanes.
92. Another factor that means that tolled crossings carry less traffic is that drivers travelling in peak periods usually have little choice of journey or route, but off peak they may decide because of tolls to take a longer route or make a different journey (e.g. to a different shopping centre), the result is that a tolled crossing in off-peak periods is empty compared with an untolled crossing.
93. The Council seem to have made a virtue out of tolling discouraging people from crossing the river by saying that their aim was to "lock in" the "benefits" of a crossing by discouraging traffic - "What we're proposing is almost unique in that it is a new road scheme that will actually reduce traffic levels in 2015 and reduce CO2 emissions." (Council press release in June 2008 ¹⁹, 3rd para from end)

¹⁹ (NAAT015A) <http://www2.halton.gov.uk/merseygateway/content/newsmedia/2008newsreleases/564045/>

94. Despite this press release, perhaps fortunately for the authorities, most businesses and individuals seem not to be aware of the intention that there will be less traffic, and have got the impression that the crossing capacity with a second bridge will be approximately double what it is now.
95. The reduction in the effective capacity has the effect of pushing traffic onto other existing crossings to the west (Mersey Tunnels) and east (Warrington bridges and M6 Thelwell viaduct). In July 2008 the Executive Board of Warrington Council considered a report - "Mersey Gateway Technical Note 78 - Impact of Mersey Gateway on Traffic Conditions in Warrington - Draft June 2008"²⁰. Warrington Council were concerned about the increased traffic and congestion on the Warrington bridges, though they later decided to continue their support for the plans apparently because they have been told that they will be given some money to try and deal with the increased congestion.
96. The report and supporting documents that the Warrington Executive Board considered seemed to be the only things that were then in the public domain but we subsequently became aware that the fact that traffic will fall can be seen by comparing figures in part of the Environmental Statement (CD/14 - Chapter 16 "Transportation" - Appendix 16.5, comparison of figures on pages 15 and 16). In our view this was crucial information and should not have been lost in this way.
97. The traffic data is also in a document that has only recently become available the "Traffic Forecasting Report Volume 2: Tables and Figures Jan 2009" (CD/197 – you need to skip volume 1).
The daily traffic on the bridge in the "base year" of 2006 "24 Hour AAWT" was 83,667 (page 79 of volume 2). The equivalent for 2015 assuming that the new bridge is built and both are tolled is shown on page 99. The existing bridge is 12,696 and the new bridge is 61,559. In other words the effect of the toll is that there will be about 10,000 a day less journeys than there were in the base year. As they are forecasting that demand in 2015 will be 94,286 there will be about 20,000 journeys a day deterred or diverted by the tolls. This is of course their forecasts, the reduction due to tolling could be even greater.

²⁰ <http://212.248.237.112/CmisWebPublic/Binary.aspx?Document=8733> Report on traffic to Warrington Council

Cost of the bridge

98. Various figures have been quoted for the cost of the bridge. Following a query from the MTUA, in January 2004 the engineering consultants (Gifford) for the new bridge said that "The estimated cost of the preferred route is actually £202 million, but the DfT require an "optimism bias" to be added to this (to allow for the fact that most construction projects run over budget). For this project the optimism bias is 66% bringing the cost estimate up to £335 million."
99. On the 18th November 2004, the Halton Council Executive Board considered the question of tolling and what would be recommended to the Government. They were told - "Financial analysis refined during the year indicates that the cost to Government if the new crossing were not tolled would be of the order of £750m"²¹. This figure of £750 million for an untolled bridge was repeated in various places including the special edition of the Mersey Crossing newsletter of November 2004.
100. Though the cost of an untolled bridge was now said to be £750 million, the cost of a tolled bridge was implied to be a lot lower – the previously mentioned Halton Council news release on the 11 January 2005 said - "The cost of building the bridge is estimated to be £250m but sometimes a figure of £350m is quoted which includes a so-called optimism bias, which is introduced at the request of Government." A later release from the Council - the June 2006 edition of "Inside Halton" - gave the estimated cost of a tolled bridge as £305 million.
101. The impression that had been given that a tolled crossing was far cheaper to build than an untolled one is the opposite of reality. Much of the cost would be the same whether tolled or untolled, as the bridge would be designed by consulting engineers and built by contractors possibly as a design and build fixed price contract. The only necessary differences in cost would be that a tolled bridge would be more expensive to build and operate for various reasons.

²¹ (NAAT016A) [http://www.halton.gov.uk/committeeminutes/Board%202004-2005/Executive%20Board/18%20November%202004/Partone/Item%20No.%204\(c\).doc](http://www.halton.gov.uk/committeeminutes/Board%202004-2005/Executive%20Board/18%20November%202004/Partone/Item%20No.%204(c).doc) (scroll to section 8)

102. A tolled bridge needs more land to accommodate tolling plazas and for the additional lanes as traffic approaches the plaza and then exits the plaza and approaches the bridge. The TWA Statement of Aims (CD/12) at para 5.1 says that the land requirement for just the tolling plaza on the new bridge is approximately 4 hectares.
103. A tolled bridge not only has to meet the cost of constructing the plaza and additional lanes, it also needs tolling equipment, and people to operate and maintain it and to account for the tolls. Perhaps not surprisingly the TWA Cost Estimate (CD/17) gives no separate costs for any of the capital expenditure related to tolls, and there do not appear to be any figures anywhere for the revenue costs.
104. A tolled bridge has far more "consultants" than an untolled one.
105. The construction of a tolled bridge is delayed by the extra legal requirements and the very long time that has to spent in creating a perception through the news media etc that the only choice is tolling. These delays substantially increase the cost. There may be other reasons for the delays apart from the tolling issue, but in 2002 the Council promotional material said that the new bridge could be open in 2007 and the MTUA were told in December 2003 by Halton Council that the new bridge "could be open to traffic in 2008." Perhaps if it had been agreed that the bridge would not be tolled, this forecast would have been accurate.
106. The "Estimate Of Costs Rule 10(3)(B)" (CD/17) gives the cost of the bridge as £561,311,295 and recently the Council have been quoting the "outturn" cost of the tolled scheme as £604 million. The increase from the original figures for the cost of a tolled bridge of £250 to £350 million, is perhaps a change of tactic to try and give the impression that the Government could not afford to build it and to try to justify the billion or two or three that will be taken from drivers in tolls.

A bridge too far

107. The Liverpool Macroeconomic Research Ltd report (CD/206) published in September 1998 examined various possible routes for a new bridge. It concluded that the maximum economic benefit was a western route (i.e. nearer Liverpool).
108. Another report - "New Mersey Crossing – Technical Report 13 – Economic Impact Assessment" - was done by Amion Consulting in 2003 (this report does not seem to be one of the "core" documents and we have asked that it be added). In the view of Amion Consulting there was little difference between the overall economic effects of any of the route options, though a crossing to the east would benefit Warrington more and a crossing to the west would benefit Merseyside more. The 2003 report refers to a 1999 report (Economic Impact of the New Mersey Crossing) done by DTZ Pieda Consulting, which Amion says "concluded that a crossing to the west of the existing bridge would be most beneficial in terms of its employment effects" (end of section 2 on page 15). Both the Liverpool Macroeconomic Research report and the DTZ Pieda Consulting report are referred to in "The New Mersey Crossing – Stage 2 Final report" (CD/207) from Oscar Faber published in February 1999. The report says (second section 3.2.6) "The conclusion must be that a western crossing would do most to (a) attract new jobs to the impact area and (b) ensure these were located in the area of greatest need (i.e. Merseyside)."
109. There is of course a major factor that was not taken into account by the above economic research – it assumed that the existing bridge would remain in place unchanged. (Though with one "central " option of a new bridge immediately alongside the existing one, the existing bridge might have been converted so that it was four lanes one way operated in tandem with the new bridge.) The effect of virtually closing the existing bridge and diverting the bulk of the traffic further east must create an even bigger negative economic difference between the western and eastern options.
110. The 1999 report assumed that a western crossing would start at the end of the A5300 (Knowsley Expressway) and cross the river to the south east joining the Weston Point Expressway. A more direct line, though much longer and

presumably more costly and affected by the constraints of the river hydrology, would be to cross the river just east of Hale Head going towards Ince Banks and connecting to the M56 between Helsby and Frodsham. It would give a good direct link between two European routes the E20 (M62) and E22 (M56).

111. Most of the length of such a bridge could be at a low level similar to the Tay bridge or the Florida Keys bridges, though a high level bridge stretch (or a completely separate structure) would be needed to give whatever clearance is essential over the Ship Canal. The existing bridge would be left as it is.
112. There are almost no houses or other properties along this more direct line and it would reduce disturbance of the contaminated land and river bed which exists at the site proposed by the Council. The traffic would largely avoid areas near to where people live. It would also mean that as most of the traffic crossing at Runcorn wants to go west rather than east, there would be shorter travelling distances and therefore less vehicle emissions.
113. According to the 2003 Amion report, most of the traffic using the existing bridge either has its origin or its destination outside Halton –
- “Of the current traffic flow on the Bridge of 80,000 vehicles each weekday, only about 20% of all traffic movements across the Bridge are purely internal i.e. between Runcorn and Widnes. 41% are trips across the region but with either their origin or destination in the Borough of Halton. 39% are using the Bridge entirely as a through route across the region.” (page 21)
114. The same report said that - "The major movement across the Bridge is in and out of Liverpool from Runcorn, Vale Royal, Chester and North Wales." (page 21) This reinforces the fact that the optimum route for a new crossing would have been to the west of the existing bridge and not to the east where it will be further away.
115. We realise that a more western route might cost a lot more but that would have to be weighed against the economic gains and the gain of taking much of the traffic away from the main residential areas.

Use of Private finance

116. It appears that the new bridge is to be provided as a Private Finance Initiative (PFI) scheme. PFI is a form of Public Private Partnership (PPP) that developed in the early 1990s under the Conservative Government and has been very widely used by the Labour Government since 1997.
117. Under PFI / PPP what would have been a publicly owned and operated facility is privately designed, built, financed and operated. Private finance is an expensive device with the apparent purpose of excluding schemes from public spending figures and enabling public facilities to be staffed with people on lower pay and pensions.
118. It appears that the plan to have a tolled privately financed bridge at Runcorn may go back a long way. There is a heavily redacted Department for Transport letter dated 28 Feb 1994 which was released in 2005, following a Freedom of Information request, under the heading "New Mersey Gateway Study Report". The uncensored bit includes - "A new crossing of the River Mersey was identified as one of six possible candidates for private finance in a consultation document which the Department published in 1990. In August 1991, the Mersey Crossing study was commissioned to examine the potential for such a scheme." ²²
119. Privately financed schemes are more expensive for three reasons. Firstly there are various consultants, lawyers, accountants, bankers etc being paid large sums. Secondly, private finance means private borrowing and this is more expensive than public sector borrowing. Thirdly the process of getting PFI schemes approved is a very long one, this delays the scheme and there is relatively high inflation on construction schemes.
120. This dim view of private finance is not just ours. In 2004 research carried out by Manchester Business School was published by the Certified Accountants as report - "Evaluating the operation of PFI in roads and hospitals" ²³ . It included - "it shows that the Highways Agency was unable to demonstrate (even using the Government's methodology, which favours private finance over public finance)

²² <http://www.dft.gov.uk/foi/responses/2005/aug/newmerseygatewaystudyreport/rmationaboutthenewmersey2159.pdf>

that these DBFO schemes had lower whole-life costs than conventional procurement. Since the discounting methodology serves to reduce the apparent cost of the DBFO option, this means that the cash cost of DBFO must be very much more than a publicly funded option and that DBFO is a very expensive way of constructing, operating and maintaining roads." ²⁴

121. It also said - "...our analysis shows that PFI is a very expensive way of financing and delivering public services that must, where public expenditure is constrained, lead to cuts in public services and/or tax rises, that is, a cut in the social wage. In contrast, the chief beneficiaries are the providers of finance and some of, though not necessarily all, the private sector service providers, leading to a redistribution not from the rich to the poor but from the mass of the population to the financial elite. In short, PFI does not pass the accountability test." ²⁵

122. Manchester Business School have carried out subsequent research on PFI particularly on roads including another report published by the Institute of Chartered Accountants of Scotland in 2008 – "Financial Black Holes: Accounting for Privately Financed Roads in the UK" ²⁶ . The report is fairly scathing about the information available for PFI schemes - "In short, the lack of consistent, comparable and understandable financial information in the context of PFI makes it difficult for public sector stakeholders to understand where public money is going, how it is being used, and the extent of future commitments and liabilities" (Page 202).

123. There appear to have been three bridges built under PPP / PFI –

the Skye bridge which opened in 1995 (which is sometimes referred to as the "first" PFI project),

the bridge which opened in 1991 at the Dartford Crossing and the second Severn Crossing which opened in 1996 (the latter two schemes were developed under PPP).

²³ http://www.accaglobal.com/pubs/publicinterest/activities/research/research_archive/rr-084-001.pdf full report

²⁴ <http://notolls.org.uk/pdfs/runcorninquiry-naato17a.pdf> ACCA report page 85

²⁵ <http://notolls.org.uk/pdfs/runcorninquiry-naato18a.pdf> ACCA report page 224

²⁶ (NAAT019A) http://www.icas.org.uk/site/cms/download/res_shaoul_financial_black_holes_2008.pdf see page 202

The Dartford Crossing bridge and the second Severn Crossing were built using legislation designed for the purpose – “Dartford-Thurrock Crossing Act 1988” and “Severn bridges Act 1992”. The Skye bridge was built using the general powers in New Roads and Street Works Act 1991. This is the same legislation being used at Runcorn which makes it a criminal offence to refuse or fail to pay the toll. By the time that these hated tolls were removed in December 2004, 130 of the islanders had been convicted as criminals. Before the tolls were removed there were various challenges in the courts as to the legality of the Skye Bridge Toll Order and the “Assignment statement” which gave the private operator the right to collect tolls.

124. Another feature of these privately financed tolled roads, in Britain and overseas, is that there are usually secret “funnelling” clauses. The authorities agree that surrounding roads and road signs will be designed to direct traffic on to the tolled route. The authorities also agree not to do anything to relieve congestion on untolled alternatives. Though if the Government succeed in tolling the existing free bridge they may try to extend tolling further east.
125. The banks are the usual suppliers of the bulk of the “private” finance. The British banks were already in trouble when on 8th October 2008 the Chancellor announced a “rescue” package of £500 billion. Despite that bail out there was an almost total collapse in the financial system in Britain and some other countries, with five of the British banks (Lloyds TSB / HBOS, RBS, Bradford & Bingley, and Northern Rock) virtually taken over by the Government. To reflect this situation, the Office for National Statistics on 19th February 2009 ordered that the National Debt be increased by 1.5 trillion pounds ²⁷. Since then further astronomic sums are in the process of being pumped into the system by the Government in various ways including “quantitative easing” or “helicopter” money.
126. All of this has made a total mockery of any Government claims that, despite taking fifty billion pounds from roads users each year, the building of roads and

²⁷ <http://www.guardian.co.uk/politics/2009/feb/20/public-debt-gordon-brown> Guardian - Bailouts add £1.5 trillion to Britain's public debt

bridges can only go ahead with "private" money. The Government have already started to bail out PFI. ²⁸

127. The New Roads and Street Works Act 1991 tolling powers have only been used twice before (Skye bridge and the M6 Toll Road) . The main financier of the Skye tolled bridge was the Bank of America which recently received a \$45 billion bail-out from the Federal Government ²⁹. The M6 Toll Road is operated by a subsidiary of the Australian Macquarie banking group. That group was also taking the lead in a Public Private Partnership scheme in British Columbia. The scheme was very similar to the Runcorn one. The PPP was to build a new tolled bridge and to also take over the existing bridge. That scheme collapsed in February 2009 and the Government of British Columbia is now having to provide all the finance ³⁰.

²⁸ (NAAT020A) http://news.bbc.co.uk/1/hi/uk_politics/7920522.stm BBC - Government to 'prop up' PFI deals

²⁹ <http://news.bbc.co.uk/1/hi/business/7832484.stm> BBC - Bank of America bail-out agreed

³⁰ (NAAT021A) http://www.bclocalnews.com/surrey_area/surreyleader/news/40445278.html

Economic effects

128. A new road or river crossing would normally bring economic benefits to businesses in the surrounding region because it increases their catchment area. The early research on a new Mersey Crossing indicated that these economic benefits would be substantial but the research was based on an untolled crossing.
129. It is obvious that a toll will substantially reduce the benefits as it will have the effect of discouraging cross river movement and split the catchment area into two thus reducing the agglomeration benefits which arise when businesses, workforce, suppliers and customers are brought closer together. Businesses where transport is a key factor will avoid being based in an area where there are tolls. Tourists and shoppers and prospective employees will tend to avoid tolls.
130. The Mersey Crossing is the worst possible case in that not only is the new crossing to be tolled but a free crossing which currently carries more traffic than the eight lanes of the Mersey Tunnels is also to be tolled. The overall economic effect is likely to be negative - the lack of a new crossing sets a limit on growth, but tolls on both bridges could be an incentive to actually move away.
131. It is generally accepted that there is a relationship between economic growth and traffic growth. The effect of the Runcorn plans will be to stifle traffic moving around within the region and this will have a negative economic effect.
132. The earliest economic research which dealt with the building of a new bridge seems to be "The Economic Impact of a Second Runcorn Bridge" (CD/206) published in September 1998 and which was done by Liverpool Macroeconomic Research Ltd (linked to Liverpool University). At 1998 prices, they estimated that the benefit to the Cheshire economy would be up to £210 million a year and to the Merseyside economy a further £60 million a year ³¹ (this is on page 3 of the report but that page is missing from CD/206). This meant that in economic

³¹ Table 9 Merseyside Economic Impacts - Original Western option without public transport Year 10 = 0.42% increase in GDP.

Table 12 Cheshire Economic Impacts - Original Western option without public transport Year 10 = 1.4% increase in GDP. (See also bottom of next page)

<http://notolls.org.uk/images/runcorninquiry-naato22a.jpg> Page 3 of 1998 Economic Impacts Report Exec Summary gives +£150 million for a +1% point change in GDP in either Merseyside or Cheshire.

terms, a bridge would pay for itself very quickly. But the research was on the basis of an untolled bridge. If you not only tolled the new bridge, but also tolled the existing free bridge, the effect on the local economy would be very different.

133. Amion Consulting then did an "Economic Impact Assessment", published in July 2003 (not in the "core" documents). They calculated a figure of £85 million a year at current prices for "Net additional value added" ³² (para 4.6), but again the benefits calculated were on the assumption that the bridge would not be tolled.
134. In April 2004, the Government said that they wanted more information before deciding on a new crossing, part of this was to be the economic effect of tolling. So there was then another report from Amion Consulting - "New Mersey Crossing - Wider Economic Impacts" . This was published in November 2004 but again is not in the "core" documents (we have asked for it to be added).
135. This November 2004 economic report devoted only 2 pages (61 and 62) ³³ to effect of tolling. In our opinion it was a superficial assessment, and was just based on a survey ³⁴ of existing "businesses" in the area. Businesses were asked two questions on tolling.
136. One question was- "In your opinion what is an acceptable toll level (each way)?" The answer to this question was not revealed in the report.
137. The other question was "Please consider the following scenario - Staff and business users have to pay £1.30 to cross the River Mersey (at all points). This is an equivalent to the charge currently made for crossing via the tunnels - What effect would you expect this to have on your business?" There were 5 boxes to tick going from "large effect" to "No effect".
138. As the survey was going to businesses, and those most interested would be HGV operators, it is strange that a figure of "£1.30" was quoted for "business users" as the rates for HGVs going through the Mersey Tunnels at that time were up to £5.20 (it is now higher).

³² <http://notolls.org.uk/pdfs/runcorninquirynaato23a.pdf> Amion July 2003 page 50 (value added)

³³ <http://notolls.org.uk/pdfs/runcorninquirynaato24a.pdf> Amion Nov 2004 pages 61 to 62

³⁴ <http://notolls.org.uk/pdfs/runcorninquirynaato25a.pdf> Amion Nov 2004 Appendix 3

139. In any case it appeared that all of the conclusions were based on which box those who returned this survey ticked. There were 239 responses of which 71% said tolling (at the £1.30 rate) would have an effect on them. From this it was then somehow deduced that the employment gain for a tolled crossing would still be 40% to 60% of that for an untolled crossing. (In terms of jobs this was said to be 1,700 to 2,500.)
140. The conclusion that a tolled crossing would achieve up to 60% of the gain of an untolled crossing is in our opinion built on thin air, and putting a toll on the existing free bridge is more likely to reduce employment. Though as the existing bridge is also to be downgraded so that there will actually be less overall traffic in 2015 than in 2006, it is difficult to see how anyone could believe that all this could have anything other than a negative effect on the regional economy.
141. The final conclusion of the November 2004 report said (page 63) - "Some 6,920 new jobs ... are expected to be generated". Though this appears to actually be the number of new jobs if there were to be no tolls.
142. In the Halton Council news release of 11th January 2005 - "Mersey Gateway would bring benefits to all", though the Council were now recommending a tolled bridge, they justified it to the people of Halton by quoting job figures which appear to be those for an untolled bridge: "The cost of building the bridge is estimated to be £250m ... However some of the benefits will include almost 7000 jobs and an £80m annual increase in GVA, the statistic which measures economic output for the regions of the UK."
143. Perhaps in response to our comments that since 2005 there had been almost nothing published by the Council on the effect of tolling, the Council have now published the Amion "Mersey Gateway Wider Economic Impact Report" (Feb 2009) (CD/200).
144. The new document appears to some extent to be a rehash as some figures are quoted at 2002 prices. The report says that there was a generally positive business attitude to the "Mersey Gateway project", without making it clear how aware the businesses were that the intention was to toll both the new bridge and

the existing bridge, and that the latter would be impaired with the overall result of the two bridges carrying less traffic in 2015 than the one bridge does now.

145. The document adds nothing to the almost undetectable amount that the Council had previously published on the effects of tolling. If anything it has even less on tolls than the 2005 version of the report. It does not attempt to quantify the effect of tolls but does say that once there are two tolled bridges that "In total, some 4,640 new gross jobs are expected to arise". This is less than the 6,920 new jobs that they predicted for an untolled bridge in their November 2004 report, but more than the 1,700 to 2,500 that they somehow predicted for a tolled one. In any case it is an amazing claim that there will be any new jobs at all as the tolls mean that there will be less traffic crossing at Halton in 2015.
146. The economic gains and extra jobs suggested in the report mainly seem to come from travel time saved by businesses and from agglomeration effects. In our view the tolling will in fact act as a barrier and thus have a negative agglomeration effect. The figure for time saved does not appear to take into account potential delays caused by toll collection nor that traffic may divert onto longer routes via Warrington or the M6. Neither does there seem to be any consideration of the effect of tolls encouraging existing businesses to leave the region and discouraging possible new businesses from coming here.
147. The report says (table 2.2 on page 7) that there is a Net Present Value (at 2002 prices) of £216 million. This is after deducting "User charges" of £618 million from the benefits, the main ones of which are £426 million in travel time for businesses and £285 million in travel time for "consumers". As has been demonstrated with the failure of the M6Toll where for the last quarter (January to March 2009) average daily traffic was only 34 thousand. This is 11 per cent down on the same quarter a year ago, nearly 40 per cent below the peak which was in the third quarter of 2006, and a small fraction of the 200 thousand vehicles a day using the equivalent stretch of the M6.
148. Most drivers and businesses have an aversion to tolls and avoid them if they can indicating that if the time saving requires the payment of a toll then they value their time at a lower price than appears to be assumed in these models. It is in any case not clear how these time savings have been calculated as much of

the traffic that uses the existing bridge comes from or is going to the west and will have to make a longer journey. The toll collection itself can cause significant delays at peak periods.

149. The same table (2.2) says that there is a Benefits to Costs ratio of 3.95. The methodology used to calculate this may have been appropriate if this had been a conventional roads scheme which was being funded by the Government. But in this case most of the funding (if you ignore the banks bail-out) does not come from the Government. Indeed in the case of a tolled bridge it might have been expected that none of the cost would have come from the Government, and this calculation would then have resulted in an infinite "Benefits to Costs" ratio however small the benefits were, which demonstrates how meaningless this ratio is. Despite this the Council seems to think that this meaningless figure proves that the scheme is "High value for money" (HBC/2/3S para 8.1.4).
150. The "user charges" of £618 million as well as being a cost to people and businesses in the region will not produce that amount of net income to the authorities as taking these tolls out of the regional economy will result in a smaller tax take for the Government. This seems to be about 20 per cent, so there is an indirect cost to the Government of imposing £618 million of tolls of around £120 million.
151. Though it is not clear whether the tolls figure is £618 million or higher. Toll collection is a major cost and it is not clear if this has been netted off. The report also mentions "targeted discounts" but gives no details of what they have been assumed to be and how they affect the quoted toll income. It is also not clear how VAT has been treated as our understanding is that as the bridges will be privately operated the tolls will under an EU Court ruling have to include VAT which will go to the Government less the small slice that it has to give to the EU. It could be that though the Council is being given some money by the Government that may be more than offset by what the Government may take from the tolls income as VAT. (See also the section on Tolls Income which indicates that tolls will be far higher than £618 million.)
152. The report says (para 4.3.5 at page 29) that –

“.. However, the majority of respondents (to a survey) noted that tolling the Mersey Gateway and the SJB would have a negative impact on local people and businesses. The Socio-economic Impact Assessment notes that tolling could increase social exclusion for the poorer members of society by raising barriers to, amongst other things, jobs. In addition, employees (who travel regularly across the SJB or would do so across the new bridge), would be negatively affected. Earlier business focus groups (2004) noted that businesses were also concerned that tolling may decrease the existing labour pool for jobs as individuals would be less willing to pay to access their place of work...”

153. Amion go on to dismiss the above by saying that the “Sustainable Transport Strategy” and “targeted discounts” will “address these issues”. The reality is that if people were fully informed of what was happening they would be even more strongly opposed to the Council plans. Instead of informing people, what has taken place is a propaganda exercise.
154. The report also refers to the English Indices of Deprivation 2007 ³⁵, and points out that deprivation in Halton is a lot higher than in most local authorities. It is interesting to compare the Halton situation on those Indices with that of Liverpool and Wirral who have had the “benefit” of a tolled river crossing (the Mersey Tunnels) since December 1933.
155. There are six measures used in the 2007 indices to compare deprivation. But in the context of a scheme which it is claimed will boost the economy, the “Rank of employment scale” seems most relevant. Halton is indeed one the worst local authorities (77th out of 354), but Liverpool is the 2nd worst and Wirral is the 8th worst in England.
156. Deprivation within local authority boundaries can vary considerably and the Amion report mentions the “Super Output Areas” which are used in the Indices of Deprivation to show the position at a lower level. The Indices divide England into 32,482 SOAs. The Indices includes at Annex J ³⁶ a list of the 100 most deprived SOAs in England. Liverpool has 28 of them and Wirral has 5. Halton has no SOA in these worst 100.

³⁵ <http://www.communities.gov.uk/documents/communities/pdf/733520.pdf> Indices of Deprivation

157. The report also says (para 3.3.15 on page 12 that "Liverpool is identified as having the lowest employment rate to March 2008 (65.2) of all the major cities considered, the lowest IMD 2007 median score, and the lowest ranking on the Social Deprivation Index." This again is despite the "benefit" of the existing tolled crossing at Liverpool and despite the region and particularly Liverpool receiving many billions of public funds over the last decade.
158. The dearth of information published by Halton Council on the effects of their tolling plans can be compared with studies done in Scotland (one on the Skye bridge by Napier University ³⁷, the other on the Erskine bridge over the Clyde ³⁸) which indicated that there were very significant economic benefits if tolls were removed. More recently (October 2008) a study ³⁹ by Colin Buchanan on the economic effect of the tolls on the Humber bridge was published. That study also concluded that there would be substantial economic benefits if the toll was removed.

³⁶ <http://notolls.org.uk/pdfs/runcorninquiry-naato26a.pdf> Annex J to The English Indices of Deprivation

³⁷ <http://www.napier.ac.uk/randkt/rktcentres/eri/projects/Documents/skyeReport.pdf> Report on Skye bridge

³⁸ (NAAT027A & NAAT028A) <http://www.west-dunbarton.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=23547>
West Dunbartonshire - News letter May 2006 - see pages 1 & 3

³⁹ <http://colinbuchanan.com/uploads/cms/files/2ced2180-21a4-4665-ad1c-5c3a1bf38aea.pdf> Report on Humber bridge

Socio–Economic Impact

159. Chapter 20 of the Environmental Statement (CD/14) described “ the likely significant effects which have the potential to occur as a result of the construction and operation of the Project on social receptors within and surrounding Halton.” Here are some extracts from that report: -

20.7.21 “A number of business representatives from both large and small business in close proximity to the SJB were interviewed during the Stage 3 social research. Opinion of Project tolling was split between businesses who expressed concern that effects would be so high that they would have to close down, to those businesses which believed that the New Bridge would be economically advantageous. Effects of tolling were deemed to be greater by survey business representatives in Widnes than Runcorn, due to the requirement of businesses to cross the River more frequently from Widnes. Businesses were also concerned that tolling may decrease the existing labour pool for jobs as individuals would be less willing to pay to access their place of work.”

20.7.105 “Social research (Stage 3) indicates that tolling could increase social exclusion for the poorer members of society by raising barriers to jobs, leisure, education and services. Tolls were shown to have a greater impact on those on a low income, the disabled and older people.

Research has shown that as a result of tolls it is these groups who sacrifice crossings and seek local employment, education and services therefore reducing opportunities available to them. If such a sacrifice is not an option these groups were shown to suffer economically and socially as a result of tolls. Social research (2007) identified that, as a result of tolling, residents may choose to alter their travel plans, including where they would look for work. Furthermore, if toll levels are perceived to be too high, some individuals may decide to remain unemployed or quit work due to increased travel to work expenses. Due to the large catchment area which will be affected through implementation of tolls on the SJB and the New Bridge the effect of toll charging to employment opportunities is of high magnitude. Any changes in employment due to tolling will be an indirect result of the Project. Tolling of

the SJB and New Bridge will be permanent and long term in effect. Consequently, the effect of toll charging to the employees (who travel to Halton by private vehicle) will be of **high negative significance.**" (The emphasis is as in the report.)

20.7.136 "Social research (Stage 3) identified that individuals may reduce cross river social trips to friends and family. A reduction in trips may result in less frequent visits to see elderly relatives or individuals with LTLIs in addition to other social networking trips. A reduction in social visits may result in a decreased quality of life for some individuals. Furthermore, it was noted that implementation of tolls may hinder access to hospitals, including access to hospital appointments or visiting sick friends/ relatives."

20.7.138 "Implementation of tolls may result in a change in access to facilities, services and social networks through social exclusion of individuals with low incomes. All receptors that may be affected include the travelling public (using private vehicles). Due to the potential of social exclusion to a large proportion of the population within and surrounding the Borough, and the extent of income deprivation within the area, effects of toll charging to access is considered to be of high importance. Due to the large catchment area which will be affected through implementation of tolls on the SJB and the New Bridge the effect of toll charging to a change in access is of high magnitude. Any change in access due to tolling will be an indirect result of the Project. Tolling of the SJB and New Bridge will be permanent and long term in effect. Consequently, the effect of toll charging to the travelling public (by private vehicle) will be of **high negative significance.**" (The emphasis is again as in the report.)

160. The Council say that they will mitigate the above adverse effects somehow. But the nature of this scheme is that it is uncertain, and it may be that the PFI contract will not give the share of profit that the Council is looking forward to. This scheme may not only result in tolls depressing the local economy with traffic, people and businesses going elsewhere, it could also mean no profits to try and relieve the negative effects on those who remain in the area. Will Runcorn become another Skye?

Conclusion

161. The Council says that the present inadequate crossing provision is “a threat to the economic prosperity of the sub- region” and that their plans will “provide effective connectivity .. and enable economic growth” (part of para 2.11 and 2.12 of Statement of Aims and Reasons CD/12). In our view of the real world, the tolling of the bridges and the overall effect of reducing the existing traffic will have a negative effect on connectivity and the economy.
162. The original aim of a new crossing appears to have been completely lost and the main driver behind this scheme is now not to improve the river crossing capacity but the wish of the Government to extend the tolling regime which already exists down river. If they get their way here then tolling will probably spread further upriver causing even more damage to the region’s economy.
163. Since the Skye bridge toll was removed in 2004, there is only one place where there is currently a toll created using the New Roads and Street Works Act 1991 powers, that is on the M6 Toll Road. In our view the tolling of that road has been an economic mistake, but in any case the Government said that drivers had the choice of untolled alternatives, in particular the old M6. In the case of the Runcorn bridges, not even that feeble excuse is available, as the plan is that the existing untolled alternative will be tolled and impaired.
164. The intention is that the tolled bridges will be paid for by private finance. We are now of course in the position that the “private” finance for a scheme which it is said that the public sector can not afford is likely to in effect be coming from the Government and the Bank of England who have pumped many hundred billions of pounds into the banks as capital, guarantees and loans.
165. This is not a “local” bridge and the Government should have accepted the responsibility for it. A new untolled bridge could by now have already been built at Runcorn. It could have been built at a cost of about £200 million, which is little more than what the Government takes from drivers in just one day. It will be most unfortunate if the influence of the tolling lobby means more tolls will be inflicted on this region, and that the effective crossing capacity will reduce and will be in an inferior location for most people including the residents of the area.

Sources

There are links in the document to various website sources and also reference to some of the "Core" documents (CD/ references) in the Inquiry library. Other documents which are attached as appendices are -

- NAAT03A - Halton Council Exec Board 1 Nov 2001 - extract.pdf
- NAAT04A - Runcorn & Widnes World on 20 June 2007 from Google cache.pdf
- NAAT05A - CD197 - Vol 2 page 139 - Annual Toll Revenue Forecast.pdf
- NAAT06A - CD197 - Vol 2 page 7-8 - Toll Revenue Forecasts.pdf
- NAAT07A - Toll Revenue forecasts from NAAT.pdf
- NAAT08A - 5258 Mersey Newsletter ED4.pdf
- NAAT09A - Minister guarantees no toll...pdf
- NAAT010A - Extract from Local Transport Act - sections 110....pdf
- NAAT011A - Extract from LTA 2008 Commencement Order.pdf
- NAAT012A - Tyne Tunnels Act 1998 (c.pdf
- NAAT013A - T_W Act 1992 - Hansard 2 December 1991.pdf
- NAAT014A - Halton Council Press release 11 Jan 2005 - Mersey Gateway would bring ...pdf
- NAAT015A - Full Mersey Gateway plans s...pdf
- NAAT016A - Halton Council Executive Board 18 Nov 2004.pdf
- NAAT017A - ACCA PFI report page 85.pdf
- NAAT018A - ACCA PFI report page 224.pdf
- NAAT019A - Page 202 from ICAS financial black holes report.pdf
- NAAT020A - BBC - Government to 'prop up' PFI deals.pdf
- NAAT021A - Surrey Leader - Province je...pdf
- NAAT022A - page 3. part 2 of 4 - 1998 Economic Impacts Report Exec Summary page 2.jpg
- NAAT023A - Amion July 2003 page 50 (value added).pdf
- NAAT024A - Amion Wider Economic Impacts Nov 2004 pages 61 to 62.pdf
- NAAT025A - Amion Wider Economic Impacts Nov 2004 Appendix 3.pdf
- NAAT026A - Annex J to The English Indices of Deprivation 2007.pdf
- NAAT027A - page 1 - West Dunbartonshire - News letter May 2006.pdf
- NAAT028A - page 3 - West Dunbartonshire - News letter May 2006.pdf

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