

10th February 2003.

Dear Sir,

**PROPOSED SECOND TYNE ROAD TUNNEL - PUBLIC INQUIRY -
PROOF OF EVIDENCE**

I am writing on behalf of the Tyne Crossings Alliance, further to our Letter of Objection dated 17th July 2002 and Statement of Case dated 28th October 2002. My impression is that our Letter of Objection together with the four Memoranda enclosed substantially meets your requirements for a Proof of Evidence, and the following text is based closely on those documents.

We wish to make very clear that the function of the Alliance is to supplement and to some extent co-ordinate the activities of member organisations, and in no way shall I (or any other Alliance person) agree to act instead of, or speak for, any member organisation unless that organisation so requests. No such request has been made at present, and my information is that most member organisations have indicated that they wish to represent themselves at the Inquiry. The Alliance's own representation covers most of these aspects and should be regarded as an "overview".

I shall raise here an overriding issue we raised in our original covering Letter of Objection. That is our complaint that the Tyne and Wear Passenger Transport Authority (PTA) has for many years been disseminating extensive and expensive propaganda (which we can't hope to match) all written in terms of "when the new tunnel is built" and not "if a new tunnel is built". We believe that some local transport studies are valueless because this unsubstantiated assumption has been taken as a "given", so that the decision whether to build a tunnel at all has not been properly tested by relevant studies and analysis.

This inappropriate language has reinforced a general belief on the part of local people - even well-educated and concerned local residents - that the project will go ahead whatever they do. The view is widely held that there is no intention on behalf of local government to use the consultation process to inform decision making; rather it is used to put a gloss upon and seek a pseudo-legitimacy for decisions which have already been made. The second Tyne road tunnel proposal by the PTA (an agency of local government) is a clear example of this undemocratic process.

I hope this document meets with your requirements for the Inquiry. As mentioned, I shall be raising a specific issue separately in my own name as a local resident.

Yours faithfully,

Paul Winch (Co-ordinator, Tyne Crossings Alliance).

The Tyne Crossings Alliance consists of: CPRE, Friends of the Earth (FOE), Living Streets, North East Railway Development Society (railfuture NE), Roadpeace, The Green Party, Transport 2000, Tynebikes.

To: Mr Ian Stearman, Programme Officer, Proposed River Tyne (Tunnels) Order Inquiry, Democratic Services Division, Strategic Support Directorate, Civic Centre, Barras Bridge, Newcastle upon Tyne, NE99 2BN.

**MEMORANDUM 1 of 4 - Application Documents, The River Tyne (Tunnels)
Order**

Section 2

Page 5 Part 1 Preliminary, Interpretation: We feel that the "Concessionaire" is too loosely defined. This is especially so since the Application states that EU funding is to be sought and also because major public expenses are associated with this project. We mention some of these additional costs in our comments on Section 8, below.

"financing, refinancing, operation and maintenance of the existing tunnels" conceals a financing dilemma for the existing tunnels which has not to our knowledge been made public - namely that the previous road tunnel has not been paid for.

"existing foot tunnels" needs to include the cycle tunnel.

Page 13, item 14(2) "Safeguarding Works....." We note that physical safeguarding of properties is mentioned, but not soundproofing or maintenance of the immediate environment to an acceptable standard for residents. The problem of loss of amenity and value arises. Clearly these are issues which will appear elsewhere in the documents but we note that the word "safeguarding" in this context is misleading, as it relates to the needs and convenience of the tunnel constructors and users and not residents. (Paragraph 11 elaborates this point).

We consider that a five-year term for faults to manifest and require to be corrected by the "undertaker" is inadequate.

Page 31 37(2) "existing foot tunnels" needs to clearly include the cycle tunnel (elsewhere the term cycle tunnel is used).

Page 33 38(1) The powers sought by "the undertaker" (the PTA) seem to us excessive especially in view of the likelihood of EU funding being incorporated into the package negotiated with the Concessionaire, and the certainty that major associated public costs will arise. These would include road widening, and possibly new roads. We note also that the costs of reimbursing local property owners for loss of value (item (1) below) have been accepted by the PTA rather than imposed on the Concessionaire which further muddies the waters.

Section 8

Page 1 Cost Estimate We suggest that the total cost of the project will be far higher than shown here owing to:

- 1) the need to buy out local residential freeholds (assurances given to local residents after the intervention of Stephen Hepburn MP refer),
- 2) uncosted major local roads' enlargements which would be required to take the extra tunnel-generated traffic,
- 3) the possibility of new roads - e.g. the Riverside Route to ease the increase in vehicular intrusion on Victoria Road, Hebburn, and the Felling bypass, for instance,
- 4) inflation (we understand the figures given are not even current costs),
- 5) cost overruns (highly probable),
- 6) undeclared financing costs (we are not convinced that a straightforward PFI scheme would emerge and we note with concern, for instance, reports that EU funds are being sought. We see the makings of a Skye Bridge fiasco emerging.....),
- 7) additional costs due to the need to dispose of marine dredged spoil by landfill.

We appreciate that some of these matters are raised in Section 9.

Section 9

Our scepticism over the final "cost" of this project is allied to our anxiety that this is becoming a strange financing beast, neither PFI nor PPP, and we feel this aspect of the Application needs to be clarified. Current widespread concern about the public benefit from PFI schemes in particular requires greater openness to be displayed in this project. We suspect that public sentiment would not be favourable to what would be revealed.

MEMORANDUM 2 of 4 - Application Documents, The River Tyne (Tunnels) Order, Book of Reference.

We have no separate comments to make on these documents.

MEMORANDUM 3 OF 4 - Application Documents, The River Tyne (Tunnels) Order, Environmental Statement - Non-technical Summary

We find this Summary unsatisfactory in that it begs questions which we will address at greater length in relation to the main document. We will comment on three clauses only in relation to this Summary:

Page 3: Traffic flow predictions Reference is made to "current traffic growth predictions". We challenge "predictions" which are in practice statements of intent which when implemented (even, just, expressed) lead to the result predicted. Conversely, seeking traffic reduction can restrict and then reverse traffic growth and this is not the "do nothing" policy as offered as the only alternative in the PTA's studies. Traffic limitation is a very active policy and this alternative needs to be factored in to the PTA's studies for them to be coherent and representative.

Page 4: Access We are responding to the comment: "Therefore providing good access between North and South Tyneside is regarded as a high priority by the Tyne and Wear local authorities and OneNorthEast, the Regional Development Agency, to support future regeneration and economic growth in the very areas where jobs will be created." We submit that:

(a) jobs provided in North Tyneside can already be accessed from North Tyneside where there is high unemployment, and the same relates to South Tyneside.

(b): access to jobs does not require a car and can be attained by the Metro, ferries and buses, both currently, and more conveniently in future with improved services including new bus/ferry/Metro interconnections and more frequent and new ferry services. We suggest a cross-River Metro link which would provide better access without promoting more car dependency, if better access is considered a sufficient priority to pay for the development. We develop this latter proposal further in our comments on Page 6 (below).

(c) employment in South Tyneside would have been much enhanced had a policy of waterside housing not been adopted on crucial maritime industry waterside sites - but some commercial sites remain and these can and should contribute to employment in the Borough without consideration of the impact on newly located

waterside dwellings. (If compensation has to be paid, so be it: this may be cheaper than buying out Jarrow and Howdon residents impacted upon by a second Tyne road tunnel for instance).

(d) a policy should be adopted of associating people with jobs by moving either the jobs or the people (in the latter case by enabling people to move if necessary) rather than assuming that people be required to travel daily anywhere, any distance, to access jobs. This latter is in our view a denial of a fundamental planning requirement recognised in the Government's PPG13 and mirrored in all Local Authority planning documents (e.g. the South Tyneside UDP 1997 and as subsequently amended) which highlights the need to reduce traffic and most certainly not to promote more car journeys and increase car dependency.

(e) building new road capacity to serve the recent car-focused leisure and retail developments in Boldon, south of the River, and Royal Quays, north of the River, both of which are already functioning, is in our view unacceptable post-hoc planning. The outcome would be contrary to Government new-development guidelines concerning the location of such sites. These two developments will be much in people's minds (motorists', especially), when assessing the need for a new tunnel and in our view consideration of access to these sites has already skewed the various decisions as to options which are reported in the Summary.

(f) future "regeneration" must be aimed at improving people's quality of life which includes their environment. If it is aimed purely at improving the local GDP we submit that this will further increase economic imbalances between sectors of the community (the rich will get the jobs and the poor will suffer the extra traffic) and it will damage the environment. Everyone - employed or otherwise - will suffer a reduced quality of life if continuing unrestrained car ownership is permitted (even encouraged as in this case), since the pollution and demographic consequences to which such policies give rise damage the quality of life of everyone.

(g) insensitive economic growth leads to demographic sprawl and the destruction both of the built environment and (especially) the rural and edge-of town environment. We feel that "growth" is being sought by OneNorthEast uncritically, with the consequence that quality of life will deteriorate unless the presumption that growth is a good, is itself challenged. Instead, developments should be required to show benefits case by case. In our view the concept of "growth" when thus refined will have to be de-linked from the current presumption of unlimited car access (SACTRA 1994 and 1999 refer).

(h) if "economic growth" is really to be created in the areas "where jobs will be created" (somewhat of a circular argument) we feel that much better evidence is required of what jobs may be expected. Current evidence consists of selective interpretation of comments by employers who respond to the question "Do you want better access?" with an automatic and predictable: "Yes". However if they are asked: "Are you thinking of relocating to the North East because of the nearby beautiful countryside and the relatively low car intrusion" they will also say: "Yes". Do we ape the South and destroy our remaining assets, or do we nurture the distinctive contribution the North East can make to the quality of life of its residents and visitors by actually implementing the insight, already accepted in all planning guidelines, that

the motorist can no longer remain enthroned king of all he (and she) surveys?

(i) we are disconcerted by the presumption in this clause that planning must react to perceived trends. This is the "demand-led" methodology which has been discredited again and again (SACTRA 1994). An investment of (say) £200 million including associated public and other costs (our comments on Section 8 in our Memorandum 1 refer), just to make things worse, is clearly folly.

Page 5: The role of the car Our criticisms of the tunnel project are further highlighted by the interpretation placed by the authors of this Summary on the extract from PPG13 they quote on page 5: "the car will continue to have an important part to play". This does not mean as implied in the Summary that car traffic must have priority over other modes. Indeed the gist of PPG13 is the reverse. Bicycles have an important part to play, and so do pedestrians.

Amongst road vehicles, buses, lorries, ambulances, and so on, all have vital roles to play. In each case however they are in competition for road space with the burgeoning private car. The conflict between lorry and car use - and the need to reduce car mileage - has been highlighted recently by the road haulage industry. (On page 5 of Dr Tim Richardson's report submitted to you by Friends of the Earth the author also makes this point, and he includes the quote given in the previous paragraph in its context which yields a very different interpretation).

Page 6: Alternative crossings We wish to challenge the original decision to focus on a new road tunnel from Jarrow to Howdon. The Summary says: "The suitability of several locations and types of crossing was examined. Four location options were considered". These are listed as St Lawrence ('Spillars'), St Anthony's, Walker (crossing over via Bill Quay) and St Bede's with a further "public transport option" undisclosed. The matter of non-road options has been frequently raised by local residents and was discussed at the South Tyneside Unitary Development Plan Public Inquiry. We understand the argument against a Metro bridge as being (a) very high or (b) requiring a large opening section to meet Port of Tyne requirements and we do not develop this argument, except to remark that high bridges have not been regarded as an eyesore further up the River! We suggest there is a technically feasible crossing place for the Metro from South Shields to North Shields, should a new crossing be considered necessary and financially sound (which the PTA tunnel proposal isn't, in our view).

The reply given by the PTA at the South Tyneside UDP Inquiry was that the gradients for a Metro tunnel are too steep. We challenge this view in the context of modern light railway rolling stock capabilities and point out that even the current Metro at the new junction at Pelaw has a steep incline on the Sunderland branch. We propose a different route from those cited by the PTA in the Summary. The original rail alignment into South Shields extended past the present Metro station to the waterfront. Most of this alignment remains. On the north side of the River the line wouldn't have to reach the surface - access for passengers and baggage could be attained by lift and escalator to an underground platform as is usual on underground lines including the Metro in Newcastle. Trains would extend their journey from South Shields to North Shields, where passengers would board and alight, and change trains, using the lift and escalator. The underground train would then reverse back under the

River and return the way it came: passengers boarding at North Shields would end up at Airport via Pelaw if they remained on board. This route would open up Metro access to Sunderland via North Shields, South Shields and Pelaw, as well as Airport via Pelaw.

The above suggestion provides an alternative to abandoning a new crossing and we are surprised that this option which may be hinted at in the Summary and must have occurred to rail engineers is not developed by the PTA which is after all a PASSENGER transport executive. We suspect this is because political pressure on the PTA is roads-focused and won't let go of the notion of a road tunnel even when alternatives are offered and have the prospect of being much superior. That is not a good basis for a massively expensive and socially very costly engineering project.

The above Metro suggestion does not reduce our commitment to reducing road traffic or reduce our belief in demographic solutions which reduce the need to travel.

Consultation We consider that the initial consideration of options was inadequate and the "consultation" on this matter (as with the road-tunnel scheme) was ineffective. The formation of the Tyne Crossings Alliance from local, regional and national organisations not consulted at these earlier stages of the Tyne crossings project exemplifies this lapse. A note at the end of our Memorandum 4 indicates that many of the matters since raised by the Tyne Crossings Alliance were aired with one of the sponsoring local authorities in 1997.

MEMORANDUM 4 OF 4 - Application Documents, The River Tyne (Tunnels) Order, Environmental Statement (full version)

SECTION 2 Scheme Development.

2.2.1 The A19 Corridor:

We feel that the concept of a "corridor" is unhelpful in this context, in that it implies that what has been begun with an A19 artery in mind must be finished. We contend that the concept is arbitrary and stems from a historical view of planning which started with roads and ended up with developments - usually in the wrong place. This is an outdated and inefficient planning model having no inherent logic.

The communities north and south of the Tyne can best be served (a) locally - requiring no import or export of goods and services and placing self-sufficiency at a premium and (b) from the adjacent communities east-west and from the south of the Tyne in the south and from the north of the Tyne in the north. The notion that travel must be opened up across the Tyne derives from the idea that "economic growth" is transport-led. Clearly this is true of urban sprawl but the concept is untrue and damaging when it comes to enhancing the quality of life for everyone and promoting sustainable and durable businesses. We exclude from this latter category "sweatshop" satellites of multinationals, which may come and go and leave more headaches in their wake than if they hadn't been. The better alternative is to recognise, foster and promote local initiatives and indigenous talent. This requires a different business-support ethos from that implicit in this Section.

Concerning the claimed support for the tunnel by the Freight Transport Association, we would point out that it has publicly raised congestion due to ever-

increasing car traffic as an obstacle to freight movements requiring Government control: the proposed tunnel can do no other than boost car traffic in the region and must therefore hinder freight movements. We would be perfectly happy to see buses, emergency and police vehicles and possibly goods vehicles given priority access to the present tunnel and this would overcome many of the problems cited. This step which might reduce motorists' access to the tunnel would also make a clear statement that car-miles must be curbed. The tunnel proposals as delivered by the PTA are, in contrast, a statement of the opposite intent: namely that the project is specifically designed to increase car journeys and inculcate new cross-River car driving habits.

Commenting on the specific envisaged functions of the proposed tunnel, and using the same bullet points as in the Environmental Statement:

Connections to the region's ports are essentially east-west (at least as far as the A1) and not north-south. Goods vehicles could be given priority through the present Tyne tunnel as already mentioned. Strong incentives (perhaps plus disincentives) should be given to shift port traffic to rail.

Access to Newcastle and Teesside Airports seems to us scarcely to hinge on the proposed new road tunnel. The promotion of air traffic creates similar problems to road traffic besides being an exceedingly high-risk business strategy in an unstable world with potentially volatile fuel prices.

Tourists come to the region because of its still-beautiful countryside and still (just) open spaces. All roads developments that increase traffic and car-dependency (more cross-regional and intra-region car commuting for instance) threaten the precise resource the region claims to seek to enjoy, exploit (in a constructive sense we hope), and enhance. The key to reducing traffic impacts on other crossings is to reduce traffic in total - not to draw in yet more, as this scheme would do. Bridge tolls could be part of a scheme to reduce traffic rather than redistribute it.

We have covered the PTA's claim that residents need to be enabled to drive across the River more easily in our comments in our opening paragraphs and our next bullet point also refers.

We are not convinced that future developments need to create a long-term imbalance between the supply and demand for labour north and south of the River. Clearly planning for economic development must seek to avoid any such imbalance. Perhaps, now, the recent location of houses on prime maritime commercial land such as shipyards, on the Tyne riverbanks, can be seen as a mistake. This lesson must be learned from and not repeated, and remaining commercial riverside land should be earmarked for maritime-based employment without let or hindrance from the owners of new riverside houses adjacent to these sites. There is great uncertainty over the PTA's Summary's claims regarding the future employment potential of land north and south of the River and in our view these claims do not justify an investment of this magnitude without extensive further validation and integration of these studies into others looking into alternative modes (e.g. TAMMS) and an investigation into the nature of job creation itself which is neither inherently transport-related nor space-dependent (much depends on the nature of the work for instance). We expand on this point in 2.2.2.

The "existing and future journeys to and from work" bullet point merely repeats points made in the others.

Links on to the main national roads network are east-west and not north-south. This bullet point only makes sense if the A19 is made a new main north-south artery in its own right. This eventuality is specifically denied by the early tunnel promoters (South

Tyneside MBC and Stephen Hepburn MP for Jarrow - our Note at the end of this Memorandum refers). Local residents would be appalled - as would we - if major inter-regional north-south traffic were pulled from the A1 to the A19. There is a conflict here between claims for the tunnel as a strategic resource and claims for it as a local amenity. We consider that these two sets of claims are incompatible. "Leisure and social trips" within the sub-region are not a valid reason to spend £200m on a new tunnel (including associated public commitments). This bullet point raises the bogey of retrospective planning easements for the Boldon and Royal Quays Leisure and retail developments which we believe to be improper. We raised this objection in our Memorandum 3.

All further text in 2.2.1 hinges on the presumption cited in the North East Chamber of Commerce (NECC) submissions that "the area has a high growth rate of car ownership [and] the pressure will grow in the short term". We presume that the NECC recognises that this can't continue for ever and that at least in the longer term something will have to be done about it. We submit that for a sustainable and, so far as is possible, pleasant future in the region for everyone including car users: that "something" is already overdue. Far from providing a necessary correction to an unsustainable trend this project makes it worse.

2.2.2. Key development sites in the A19 Corridor: We repeat that the problem here is not (and needn't be viewed as) a constriction in any "corridor". Give up the "corridor" paradigm which is a transport-led concept, and focus on regional transport matrices, with the emphasis always on local supply to meet local demand, and a different picture emerges. In this new picture a new tunnel is not a neutral or a benign factor - by perpetuating traffic-lead thinking it denies other options which are more sustainable, kinder to the environment, and socially just: so the project is in this sense reactionary and out of date.

We do not accept that the sites mentioned for future employment will necessarily turn out to be the ones that matter and we note that (a): alternatives to some of them are already under discussion and (b): some of the sites (Killingworth Moor for instance) have not been released for industrial use and we (and many others) would oppose any such move. Another consideration is that "new technology" opens up new land-use possibility with multiple-floor occupancy for instance permitting many new businesses to operate on "economic brown field sites". High-tech industries tend not to need ground-level access for fork lift trucks as is the presumption behind much current speculative business park development and planning.

2.2.3 Future Investment: We cited in our comments on 2.2.1 our scepticism regarding the claimed needs (and credibility) of "inward investors". We believe that most emphasis must be placed on nurturing indigenous talent, expertise and resources. Amongst these latter the maritime Rivers Tyne and Wear are a major resource and potential source of employment and income, provided they are not emasculated by unsuitable riparian developments adjacent. In our concluding remarks in our covering letter we suggested that a new paradigm is needed for managing the future of the region. The tunnel project is part and parcel of what we view as a discredited old demographic and planning paradigm. (Our comments on Page 4 of the Non-technical Summary in our Memorandum 3 refer).

2.2.4 Regeneration Initiatives along the A19 Corridor: All three sources quoted here as calling for the uncorking of the "A19 corridor" presuppose that there is and needs to be an arterial throughway linking the region (as distinct from the local communities) north and south of the river. This contradicts the other pro-tunnel claim that the project is mainly a local resource and long-distance traffic will not be attracted. Our comments on the eighth bullet point of 2.2.1 (above) refer. As we see the situation, the development of South East Northumberland and North Tyneside does not hinge on the provision of a new Tyne road tunnel. Improvements to the Stephenson Link can be better accomplished by much improved ferry services without the current need for a long walk both ends (in one case, a wait for a bus) to get to the Metro. Also, and alternatively, as we mention in our comments on Page 6 of the Non-technical Summary in our Memorandum 3, we consider that a Metro link across the River from South Shields to North Shields is in principle feasible and this is a much preferable alternative to a road tunnel if a crossing is considered to be necessary.

The various aspects of the PTA's recently heralded "Orpheus Project" also refer.

More detailed opposition to aspects of tunnel-related developments in North Tyneside and southern Northumberland will be voiced direct to yourselves by our Alliance member organisation CPRE.

2.2.5 and 2.2.6: Our comments relating to the assumptions behind the various Tyne crossing studies, the reactive approach they indicate, plus what we regard as inadequate consultation, are set out in our Memorandum 3.

2.2.7 Safety Issues: The PTA's own statistics show that their tunnel is safer as it is now than an average trunk road, having zero accidents. Statistics from the 'A1 North of Newcastle Multi-Modal Study (Summary and Recommendations, May 2002)' indicate that single carriageways have a good safety record compared to dual carriageways even when overtaking is permitted. The study has shown that single carriageway trunk roads can equal or better the national average record for crashes. This is presumably due to the high incidence of tailgating and other accidents caused by lack of attention and excessive speed on dual carriageways. If overtaking is forbidden in the present tunnel and this rule is observed as is more probable than rule observance in twin tunnels where speeding will be hard to police, the safety record of the present single carriageway tunnel should remain good. It could be better than for a prospective dual carriageway arrangement, as proposed, with higher permitted speeds and greater difficulty of enforcement. In addition, extra traffic generated by the tunnel must feed out onto the road system regionally and nationally, where the accident rate is much inferior to that in the present tunnel. The prospect therefore is of an increase in road accidents.

We agree that better escape routes from the present tunnel are desirable and suggest that just as they could be arranged from the old tunnel to the previously proposed new bored tunnel, they could be arranged from the old tunnel to the surface, just clear of the watercourse each side of the River and a long way from both vehicle exits and entrances. We accept that a bulkheaded escape route throughout the length of the existing tunnel is not feasible, as it is also claimed to be unfeasible for a new bored tunnel. This restraint on escape means from the existing tunnel persists whether

a new tunnel is built or not.

The existing tunnel under the proposed new arrangements appears to us not to get any safer (possibly, it gets more dangerous) as mentioned in our first paragraph of this item, and we are not aware that the PTA plans to build new escape routes from the existing tunnel as we suggest above. The existing tunnel as part of the proposed new arrangement is therefore more dangerous than it need be, and as it could be with escapes routes added. Clearly the engineering task of adding these escape routes is the same whether an immersed tube new tunnel is built or not (we take them to be included in the bored tunnel option). If these new escape routes are to be provided from the present tunnel, with or without a new tunnel, they will be expensive and require to be budgeted.

2.3 Policy Context:

2.3.1.1 The first bullet point quoted from PPG1, which is the requirement to: "reduce growth in the length and number of motorised journeys" is directly counter to the aims, let alone the outcome, of this tunnel proposal. When the Government's aim (and requirement from Local Authorities) is to reduce traffic, surely the last thing the Authorities should be doing is variously spending and authorising the expenditure of at least £200 million specifically to increase traffic!

2.3.1.3 In our view the proposal fails to meet the requirements of PPG12 as quoted in the Statement. "Social progress which meets the needs of everyone" is not met by skewing the economy and infrastructure even further towards the motorist.

The requirement to "encourage economic development and growth" has been discussed elsewhere in this Memorandum (2.2.1 and 2.2.4).

The injunction: "Development Plans should include specific policies and proposals on the overall development of the transport network and related services" implies a multi-modal approach which is not evident in this proposal. This is especially surprising and disappointing coming as it does via (not from) a Passenger Transport Authority.

The Tyne and Wear Local Transport Plan (TWLTP) is quoted as citing the proposed new tunnel as "by far the largest private sector involvement in transport infrastructure in the region, and is the key to the local Transport Plan Strategy". We are challenging the TWLTP as being out of step with the emerging Regional Transport Plan and TAMMS studies to date and therefore not a reliable guide for action. The TWLTP should have been drawn up with a new road (also, we suggest a new Metro) tunnel as an option for review and not as a "given". This latter assumption renders the study methodologically false. The comments in our covering letter refer.

2.3.1.4 In our view the proposal meets none of the PPG13 criteria set out in this section. As mentioned in our Memorandum 3 (with reference to the Non-technical Summary Page 5) to construe the words in PPG13 "the car will continue to have an important part to play" as suggesting that motorists thereby earn a free-for-all is absurd. But that is in our view the import of the PTA's argument with which they seek to override other PPG13 requirements such as the need to: "Promote more sustainable transport choices for both people and for moving freight"

"Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and
"Reduce the need to travel, especially by car".

2.3.1.7 PPG24 Planning and Noise (September 1994): We consider that the PTA has totally failed to meet the needs of this provision. Additional traffic noise would be created throughout the locality at both ends of the tunnel complex, and new traffic routes (plus "rat runs") would arise right past people's doorsteps. This is despite the fact that existing traffic levels are already insupportable and prevent even a basic conversation while walking on many South Tyneside pavements for considerable portions of the day. Critically this applies to journeys to and from school on foot. This problem would get worse. We cite elsewhere the threat to the Hebburn to Pelaw Riverside Park from a new road (the already-safeguarded "Riverside Route") for which pressure is likely to arise from residents of Victoria Road, Hebburn, and the Felling Bypass if the new tunnel were built and traffic on those roads, which is already excessive at times, were to increase.

We note that the PTA's own Application documents show major noise increases (over 25%) as arising from the proposal as far away as Sunderland.

2.3.2 Regional Planning Policy Guidance: 2.3.2.1 The objectives from the RPG for the North East (April 1999) with Proposed Changes 2001 are cited by the PTA as:
"ensuring the development is located, and designed to:

- i. reduce the overall need to travel,
- ii. reduce average journey lengths,
- iii. be easily accessed by all modes of transport, in particular public transport, walking and cycling; and

"managing and improving the transport network to:

- i. make the best use of existing infrastructure
- ii. promote walking, cycling and the use of public transport".

We submit that the tunnel proposal fails on all these counts.

As detailed in the opening paragraphs to this Memorandum (and in our Memorandum 3) we submit that access is not a goal in itself over and above other goals (such as quality of life). But where improvements are needed they can be achieved by other, non-road schemes based generally on better ferry services and access to the ferry landings, better access to the pedestrian and cycle tunnels (the reintroduction of staff might help), priority access to the present tunnels by new lanes at both ends for buses and emergency vehicles, and (possibly) goods vehicles. To increase efficiency of journeys, tolls for cars through the present tunnel could be geared to the number of occupants (with safeguards against professional tunnel passengers or inflatable same!) so increasing the efficiency of car use.

Again as mentioned in 2.2.4 above, if a crossing were deemed worth the investment, then in our view a Metro extension from South Shields to North Shields would be feasible and much less damaging to the surrounding community while having a clearly beneficial effect by reducing traffic in the region at large.

We believe that major reasons buses rarely run through the tunnel are:

a) that people are becoming car-dependent (we seek to reduce this trend and encourage people back to buses by reducing the relative attractiveness of the car and improving services by public transport), and

b) buses have difficulty getting to (as distinct from through) the present tunnel. Increased local traffic arising from a new tunnel would make this worse. Dedicated new priority lanes to the present tunnel would improve bus (and other permitted vehicle) access.

2.3.2.2 Regional Economic Strategy - Unlocking Our Potential (October 2001):

We think it is fair to say that all environmentally aware organisations - which applies to all Tyne Crossings Alliance member organisations - have difficulty with OneNorthEast's thinking as expressed in this document and others. We have briefly mentioned a different view of desirable - and more sensitive - development as opposed to uncritical and cancer-like 'growth'. Currently this is adumbrated as a necessary and self-evident good and the comments in our Memorandum 3 on the Non-Technical Summary, Page 4, refer.

Specifically, responding to the first set of bullet points in this section:

"create wealth by building a diversified, knowledge-based economy". This implies indigenous growth rather than sweatshops parachuted in by here-today and gone-tomorrow multinationals;

"establish a new entrepreneurial culture". You can't. "Entrepreneurs" must do this, and they don't spend their lives driving around. Creative people (perhaps a bit different from "entrepreneurs" but more valuable) tend to value quality of life and they are process- rather than outcome-centred. We believe this view is opposed to that expressed in most OneNorthEast documents, which tend to miss the point as a result.

"build an adaptable, highly skilled workforce". You can't do this either. Young people need to be inspired to take up creative careers by their elders and peers; creative (not sweatshop) openings have to be available and these are far more likely to arise from indigenous growth with a high "traditional" and "knowledge-based" component.

Traditional "craft" skill motivation has much in common with "knowledge-based" activity and culture, and many of the same arguments and needs apply to both. Once again this is not a transport-based model. The preferred model implies clusters (i.e. minimum or no transport) and developing existing resources rather than importing new ones. The downside of better long-distance transport links - that business flows out rather than in - has also to be taken into account.

"place the universities and colleges at the heart of the North East economy". We do not see this as a demand for new roads or road space.

"meet 21st century communication and property needs". These needs are quintessentially electronic. What is more: electronics-based service industries (probably, also, factories) can be sited on many-floored buildings so don't need a large "footprint". You don't get fork lift trucks charging around in computer consultancies.

"accelerate the renaissance of the North East". In this regard, also, we comment that one can't create something out of nothing (certainly not from an intrusive and inappropriate transport system). The people of the North East must pull themselves up by their own bootstraps and in our view a good quality of life is the first essential, i.e. we need a "think for yourself and consider others" creative culture, rather than a "me-first" uncaring consumer culture. At least public actions must cherish the former and

not reward the latter - the tunnel project speaks to the latter faction amongst us.

2.3.2.3 Assessment of proposal against regional policy and guidance:

The Statement claims that the project supports the RPG aims of "reducing congestion, reducing the environmental impact of travel and improving journey time reliability". These are all false claims confusing movement in the tunnel itself with total journeys within and outside the local communities. The project would make all these things worse and simply defer the moment we all know must come (even tunnel promoters to whom we have talked, agree) that car traffic has to be curbed. To actually increase car traffic in these circumstances is perverse.

2.3.4.2 South Tyneside Unitary Development Plan: The Inspector at the UDP Inquiry presupposed further Inquiries would be held into (a) the proposed second Tyne road tunnel and (b) the proposed Riverside Route through the Hebburn to Pelaw Riverside Park. As mentioned in our Memorandum 1 comment on Section 2, in our view the Public Inquiry into the South Tyneside UDP is incomplete without Public Inquiries into the tunnel plan (this Application), and the plan for a Riverside Route (if this project is proceeded with). This is because the Inspector specifically referred forward to such Inquiries that he assumed would occur. Our purpose in making this Objection (short of stopping the project altogether) is to gain a Public Inquiry into the tunnel proposal as was assumed in the findings of the UDP Inspector.

This section of the Statement does not mention the threat posed by the proposed new tunnel to the Hebburn-to-Pelaw Riverside Park. In our view it should. Studies into the proposed Riverside Route between South Tyneside and Gateshead Councils are already under way, and our objection to the tunnel proposals include an apprehension that this threat would be significant if the project were allowed.

2.4 Consideration of alternatives: We refer to the PTA's studies of alternative crossings in our Memorandum 3. We note that these studies did not include a Metro tunnel from South Shields to North Shields, and urge that this option be considered.

The current ferry crossing can and should in our view be enhanced with better access, greater frequency and additional landing and embarking points. We are glad to see that the PTA is exploring the option of putting on new services. It is essential that access to jetties be much better than now, with reliable and frequent public transport available right up to the landing points. Currently passengers have a long walk at the southern end and often buses at the northern end are inconvenient. The walks to and from the jetties are substantial in both cases though it is difficult to see what can be done in mitigation, here. The previous Mid-Tyne Ferries were free from these problems and in our view consideration should be given to reinstating services such as these as an additional Tyne crossing facility at different places.

2.4.2.5 Public Transport Improvement / Private Traffic restraint: We find this section half-hearted as illustrated by the words "Possible policy approaches which could be adopted were considered in a "broad brush" way and did not attempt an assessment of the economic and social costs and benefits of the measures as an option in their own right". Since the need for such measures are overwhelmingly economic and social, we see this admission as a flaw. We accept the difficulties of undertaking such a study at that time, but suggest that that doesn't detract from its need. As will be mentioned

later (2.4.3.2) studies undertaken now in the light of more recent information would give a very different result.

We are perplexed to see that the early studies cited in this section centred on Newcastle and Gateshead whereas the proposed tunnel would mainly serve North and South Tyneside. This seems to us to invalidate the conclusions so far as they affect the proposed tunnel.

2.4.3.1 The Business Case: We are intrigued by the reference: "The extension of the Metro was discounted due to the expenditure required....." as this seems to refer to a plan we don't find elsewhere in the documents, perhaps to extend the Metro from South Shields to North Shields as we ourselves suggest in our comment on Page 6 of the Technical Summary (our Memorandum 3) and again in 2.2.4 above. If this scheme has indeed been investigated we would be surprised if it were not found to be competitive with the current £200m plus road tunnel proposal, which figure includes public and other costs as we set out in our Memorandum 1 and which additional costs do not apply to a Metro alternative. Our comments on costs in Section 8 of our Memorandum 1 refer. It would seem to us that a rail-only option as set out in our comments would be vastly better, with no negative long-term consequences. Such a construction would create minimal local disturbance both while under construction and subsequently.

We submit that the business case for a new road tunnel has not been made.

2.4.3.2 Engineering Issues: We find it totally unacceptable that, on matters so important, assumptions were made and decisions taken without any supporting evidence as indicated in the second bullet point: "On the basis of the findings of the Cross Tyne Phase 2 Study, the St Bede's location was assumed to be the most appropriate for operational purposes, although no significant further analysis was undertaken".

We are unclear whether this comment relates to minor adjustments to the plan on this location, or to an analysis of options (such as the Metro extension option) which were not included in the Phase 2 Study. We feel this matter should be clarified and if necessary corrected. We claim that a new study of options including car restraint and the Metro option mentioned in 2.4.3.1 above should be undertaken in the light of the Government's Standing Advisory Committee on Trunk Road Appraisal (SACTRA 1994) report, plus other more recent reports (even, TAMMS). We feel that such a study would come to different conclusions from previous studies regarding the project's need and viability. Clearly the proposed tunnel has to be fed in to such studies as an option and not as a given, as mentioned in this text previously otherwise comparisons are meaningless.

2.4.3.3 Environmental Issues: Since we oppose all the road tunnel options at Bede, principally due to the impact on traffic levels that they all share, it is inappropriate for us to comment on these comparisons.

2.4.3.4 Conclusion: We feel that the treatment of the proposed funding is inadequate, especially since the previous tunnel appears not to have been paid for. One naturally asks: "If users can't pay off the debt on the old tunnel how can they be supposed to

pay for a new tunnel in addition to this continuing commitment?" As mentioned previously we are not convinced that what we can glean of the proposed funding arrangements for a tunnel - some sort of fusion between a PFI scheme and a PPP scheme - is viable and would provide clear management and financial control and accountability. We ask whether, if an additional tunnel were considered necessary, a Metro-only proposal might attract more reliable funding at better rates. We express lack of confidence in PFI and PPP schemes in our comments in Section 9 of our Memorandum 1.

2.4.4.1 Engineering Issues (again): We don't comment on these since we are against the construction of this tunnel because of its effect in inducing new traffic rather than for engineering reasons.

2.4.4.3 Safety Issues (again): We disagree that two tunnels are inherently safer than one from the traffic point of view, as we set out in our comments on 2.2.7. We argue indeed that the opposite is the case.

2.4.4.4 Capital Costs: We consider that this analysis is false in that it does not take into account local congestion clear of the tunnel which would make access to the tunnel complex (as distinct from through it) worse, without major improvements to local roads at public expense. Indeed such improvements could be only partial in their effect as will be mentioned in the next paragraph. If these additional road works are to be undertaken it is disingenuous not to include them in the analysis and include them as a (separate but linked) item of cost. The Tyneside Area Multi-modal Study (TAMMS) undertaken by the same consultants has shed considerable light on these matters which we feel should have informed the PTA Statement even though the TAMMS was ongoing when the Statement was compiled.

Whether or not key routes to and from the tunnel (such as Testo's roundabout) are to be improved, traffic on unimproved roads, some of which will become rat runs and most of which are residential, plus increased pavement parking which is a major problem in the locality already - plus increased noise and pollution - can not do other than make life worse for residents. These consequences are not amenable to any amelioration except reduction or withdrawal of traffic. We wish to emphasise that one cannot widen existing residential roads or pavements. Local examples of the existing problem include new estates laid out to the latest building requirements. A typical example - the estate from which this document is sent - has driveways to all houses. Most of the houses have garages and several have double garages. Hard standing is provided for visiting vehicles at intervals convenient to all houses. Nevertheless the roads and pavements of this estate are already clogged up and the only amelioration possible is a reduction in the number of vehicles.

Journey Time Reliability: This must get worse due to the extra traffic and congestion in the locality of the two ends of the proposed new tunnel, and this deterioration must feed out into the region.

SECTION 3 Scheme description. We don't find mention in the narrative of what we believe were proposed escape routes from the present tunnel to the previously proposed new bored tunnel. As mentioned in 2.2.7 we suggest that escape routes could be added to the present tunnel without building a new tunnel and the result

would be unquestionably a major improvement over present and new PTA-proposed safety levels which leave the present tunnel hazards unimproved.

SECTION 4 Assessment Method.

4.8.1 Background: The following quotation confirms our apprehension that the consultation process was designed and used to seek "negotiation" and "mitigation", regarding a foregone conclusion that a new road tunnel would be built: "The consultations were used to identify concerns of both statutory and non-statutory consultees. In turn they have helped to develop the approach to the proposal, methods of working and possible mitigation measures". Our members' view, expressed when we have had the opportunity throughout this period: that a new tunnel shouldn't be built at all, has not registered through the planning process. This gives an unbalanced result especially as only forty-four people attended workshops cited, but membership of the Tyne Crossings Alliance is hundreds of thousands and reflects a regional and national concern as well as local concern. In addition to this there are many profoundly worried local residents who simply want to move out of the locality (a few, have) hence the additional costs mentioned in our Memorandum 1.

4.8.2 Ongoing Consultations: Only CPRE amongst the Alliance members is cited in the Appendix as having been included in consultations, and TAMMS discussions that were proceeding in parallel are not mentioned. These studies were led by the PTA's consultants so they were fully informed of the TAMMS data and findings, which should in our view have informed the PTA Statement, even though the TAMMS studies were then ongoing.

4.8.6 Focus Groups / Workshops: TAMMS focus groups were held in addition to PTA-sponsored workshops, and member organisation representatives were present at an afternoon event held on 10 Dec. 2001 at the Royal Station Hotel in Newcastle. Two individuals connected with the Alliance attended a parallel evening event aimed at "the public". These Alliance representatives spoke out against the tunnel project at the afternoon and evening meetings, and the whole subgroup attended in the evening by the author of this document placed the tunnel project as lowest priority amongst the choices offered by the organisers. These two groups of meetings are unreported in the Summary. Concerning the bullet points under this heading:

Road Users: We are glad to see that consultees were by no means sold on the benefits of a new tunnel which confirms our record of these meetings (and the additional meetings mentioned above). One of the Letters of Objection we have forwarded is from a local operator of 30 vehicles, mostly HGVs, who claims the project is a "waste of money". Many objectors are car users who, however, accept the need for restraints on car use.

Residents and Groups from North Tyneside: The previously lively and coherent community of Willington Quay and East Howdon was destroyed by the construction of the first road tunnel. Hence the poor response from residents there. Numerous houses in East Howdon, and not just the ones on the line of the proposed new tunnel, are boarded up. This hardly augurs well for the outcome from the construction of a second tunnel.

Environmental interests: Great local anxiety over the future of the Hebburn to Pelaw Riverside Park should have been included under "Environmental Interests". The only way to maintain the integrity and seclusion of this park and make life more tolerable for residents of Victoria Road, Hebburn, Felling bypass and other residential streets is

to abandon the tunnel project and seek traffic reduction. Our comments in Section 5, third bullet point, refer.

Local business and river users: Our input from business and river users is that they do not see the proposed tunnel as a boon worth £200m (our comments on costs in our Memorandum 1 Section 8 refer). Many business people and river users are also local residents and they share concerns with their neighbours over traffic increase due to the tunnel and consequent reduced local quality of life which is grim in some parts of the locality already.

Residents and groups from South Tyneside: We feel that the concerns expressed by South Tyneside local residents as listed in your Summary have not been met by the PTA except to offer to buy more of them out at additional cost to the project (Stephen Hepburn MP's intervention refers). This is not a satisfactory outcome and is not satisfactory to the Alliance. Some aspects of the South Tyneside problem are the same as those in North Tyneside mentioned above. We note that the Concessionaire is not saddled with this liability.

Similar objections and major reservations about the tunnel proposals, and the presumption that a new tunnel is an appropriate response to local and regional problems, emerged at both the PTA and TAMMS consultative meetings. We are concerned that these views have not been reported in the Statement.

A Police representative at one of these PTA consultation sessions was of the view that the Jarrow exit to the tunnels (since adopted) was unsafe in that an incident would lead to a quick build up of traffic making access by rescue vehicles unreliable. We are surprised that this official comment is unreported.

SECTION 5: Traffic and Access.

Rather than a road-by-road discussion of this Section we wish to make certain overriding points some of which have already featured in our previous comments.

Traffic levels on many roads in the region are already unacceptable. However some of these roads are shown in the consultants' model as "below capacity". This begs the question of what the "capacity" of a road may be, and we can find no definition in the documents which helps define this point. We assume therefore that this is a statistic derived from the physical nature of the road and junctions taken from design criteria (such as the quoted reference "Department of Transport (now DTLR) 1993. Design Manual for Roads and Bridges."). But these capacity criteria take no cognisance of the impact of traffic on local residents. Since "capacity" is surely what local residents can endure (let alone enjoy), even to such basic considerations as whether they can cross the road to get to the shops, we submit that the conclusion that local roads excepting the A19 are "below capacity", and can therefore accept extra traffic, is untenable.

We make some more specific comments using the same bullet points:

The A19 is shown as being already over-capacity by the consultants' own criteria at several junctions including Whitemere Pool (which isn't on the A19 but feeds it). Building the tunnel would create a demand for major roads improvements to the A19 according to the consultants' own figures and this is a large unstated extra cost to the project.

We do not accept that other roads in the locality can accept extra traffic without major

additional congestion and an unacceptable deterioration in an already poor urban environment. The Consultant's own noise maps confirm our apprehensions on this point but they fail to identify roads (probably the majority of local roads) where the anticipated increase in noise (and other) nuisance is less than 25% but substantial. On the basis that the smallest increases in already excessive traffic levels, and the associated noise and other damaging effects, can have an exceptionally serious impact on local residents the prospect of an increase of towards 25%, let alone over 50% in places, is horrendous.

We submit that since the streets and pavements of South Tyneside, Howdon, Willington Quay etc.. are already frequently clogged, any claim that extra traffic will "reduce congestion" is absurd. The consultants appear not to address the existing problems on the Felling by-pass which clogs up frequently, and Victoria Road, Hebburn, on which traffic volumes are sometimes very heavy right outside people's front doors. (One property there can't be let for offices because would-be professional tenants find the location too noisy). This existing nuisance to local residents and congestion for motorists could create demand for a third east-west route in the Region, and we note that discussions are already in hand between Gateshead and South Tyneside MBCs concerning the feasibility of building the long-safeguarded Riverside Route. This would destroy the special qualities, especially its seclusion and tranquility, of the two mile long Hebburn to Pelaw Riverside Park.

Current planning development must surely seek to reduce traffic and never to increase it, least of all for increased traffic's sake.

The consultants' prediction of future traffic levels - showing that the tunnel would still be under-capacity in 2021 which is however only half way into the proposed Concessionaire's 30-year term - seem to us to be somewhat arbitrary and discussions with consultants' staff have failed to clarify the point. Currently Central Government is committed to halting the rate of traffic growth. Previously (and we hope it will again) the Government (at least the vast majority of MPs on both sides of the House) supported the Road Traffic Reduction Bill which sought a reduction in road traffic volume from present levels in absolute terms.

Any prediction of future traffic volume must take into account political will, and we are somewhat heartened by the thought that financiers are likely to recognise this risk and look askance at this project unless it be offered on grossly unfair terms to the public (for example the Skye Bridge). We are disheartened by the thought that accepting such terms would add insult to injury for residents of the region. We are also disheartened by the thought that if the tunnel were to be built, its operators would have a vested interest in defeating political moves towards traffic reduction unless and until the new tunnel clogs up as well. The logic from these considerations is not to build a new tunnel, but to take steps towards traffic reduction immediately.

When vehicles are parked on pavements, as they are so parked extensively in South Tyneside and no doubt elsewhere in the region, people sometimes have to step out into the road to get past. Those who have to do so most frequently are also the most vulnerable - families with children, pushchairs and prams and elderly allotmenters pushing wheelbarrows. Unless there is a Police change of heart and those guilty of pavement parking are prosecuted this nuisance would increase if the tunnel were built since there would be more vehicles making new cross-river journeys. Conversely if the practice is limited to designated areas, vehicles now parked wholly or partly on the pavement - and more of them than now - will add further to congestion on the roads.

5.5.5 Impact on Bus Routes Using the New Tyne Crossing: We suggest that increased traffic levels would make bus movements including in the vicinity of the north and south ends of the proposed new tunnels, worse. Therefore access through the tunnels becomes irrelevant. We suggest that new access lanes be created to enable buses, emergency vehicles and possibly lorries to gain access direct to the present tunnel. This would reduce car access at peak times and we suggest that this move would comprise a valid traffic management constraint.

SECTION 6: Noise and Vibration.

Our comments here follow those concerning traffic levels in the Section above. A 25% increase in noise levels on some streets where noise and other traffic nuisance is already excessive is unacceptable. On any street it is unfair. We are concerned that noise levels predicted in the Statement are determined at the fascia of overlooking houses - people don't walk along their fascias, but they do seek to walk along pavements!

Residents on these roads need a decrease in traffic noise and intrusion. A crucial consideration is that both ends of the tunnel complex arise in the middle of dense urban environments and the vehicles in question are in many cases already variously trundling and roaring past people's front doors with only a narrow pavement between passing vehicles and the buildings. Small front gardens and narrow yards are scarcely better protection from traffic nuisance for the residents. It is inequitable and bad social planning to make this situation worse. (Traffic shouldn't use residential streets at all, of course, but urban areas in the North East and elsewhere were not designed for anything like present traffic levels - let alone the higher levels proposed by the PTA in this scheme).

SECTION 7: Air Quality.

In our view the argument made in this Section, that expected improvements in vehicle emission efficiency will outweigh the effect of the greater number of vehicles, is unsatisfactory. Since air quality in the locality is already poor and is creating major health problems, if vehicle emission efficiency really does improve, as the consultants assume, local residents are entitled to expect their predicament to improve.

SECTION 8: Visual Impact.

We feel that this Section is cosmetic. We note that what we see as the major threat to the whole of the Hebburn to Pelaw Riverside Park is ignored (note that this two-mile-long semi-rural enclave is totally unconnected with Jarrow Riverside Park, except that they are both part of the Sustrans C2C cycle route). Public apprehension concerning the threat to the Hebburn to Pelaw Riverside Park (i.e. the "Riverside Route") is acknowledged in the Statement in 4.8.6 second bullet point under "Environmental interests".

Our comments in 2.3.4.2, 4.8.6 and Section 5 third bullet point (above) also refer.

SECTION 10 Business and Commercial Issues.

10.5 The New Tyne Crossing and the Economy: We have addressed the notion that economic "growth" hinges on access in our Memorandum 3 comments on Page 4 of the Non-technical Summary and in 2.3.2.2 above.

We claim that the employment sites evaluated in the Statement are already questionable (2.2.2) and access to jobs does not hinge on access by car. We feel that the presumption that access to both leisure activities and jobs by car should continue to be facilitated by local authorities must come to an end. It is already counter to guidelines already cited (e.g. PPG 13). We note a mention that the option of charging for parking at the Gateshead Metro Centre for instance was found to be unfeasible and are concerned that this view is defeatist and in conflict with the findings of the Tyneside Area Multi-Modal Study.

A reference in the last paragraph of 10.5.3 that employers at the Orange call centre have cited the present tunnel congestion as a problem for staff reliability makes one wonder what hours call centre people work and whether they, more than anyone else, could not choose travel times to avoid peak traffic congestion.

SECTION 11 Social and Community Issues.

Table 11.2 Community: residual impacts:

We take it that noise and fumes and other traffic related disturbances (e.g. difficulty in crossing the road and pavement parking) are not factored into these evaluations. Accordingly, since these are the main outcomes from construction of an additional tunnel, we consider these impact evaluations to be worthless.

SECTION 12 Water quality and River Impacts.

We include our comments on this topic in our remarks on Section 14.

SECTION 13 Marine Ecology.

The marine biologist in our number reports that he finds a failure to interconnect the studies reported. Some effects can be cumulative and although the possibility of harmful cumulative effects arising is recognised in Table 20.4 the nature and extent of this problem is not made clear, and we don't find clarification in the Appendices.

We note that the Environmental Agency has withdrawn its objection to the tunnel scheme on the basis that monitoring of water quality will be put in place throughout the construction work. However this measure is fatuous if, in the event of permitted levels of pollution being exceeded, the scheme is already well advanced and there may be no technical - let alone political - way of stopping it.

SECTION 14 Fish and Fisheries.

We are concerned that dumping spoil from the tunnel construction at sea could spread years of accumulated pollution. This applies especially to heavy metals trapped in the mud which we understand has not normally been disturbed by the Port of Tyne Authority's dredging in the areas in question. We are aware that the Concessionaire needs a licence to dispose of this material at sea and that this licence may be withheld.

We understand from a commercial fisherman at North Shields that there is great anxiety amongst his colleagues concerning the possible effect of both the disturbance of pollutants by the dredging process - much of which will of course end up at sea since the net flow is downstream - and concerning the effect of spoil removed and dumped at sea if this is permitted. If it isn't permitted, the Concessionaire will incur much greater costs (our comment on Section 8 in our Memorandum 1 refers). Also,

other environmental problems will arise which come under Section 19.

SECTION 19 Waste arising and disposal.

The points we make under section 14 above are recognised in the Statement, and we emphasise that disposal at sea could have major risks. Disposal of the same material on land (which if required would be because the material is too polluted to dispose of at sea) attracts not only the usual risks posed by all toxic dumping, but the additional one of requiring many lorries to convey the stuff a greater or lesser distance, creating more heavy lorry nuisance and pollution, and by the loss of scarce dumping space for this class of material. Once again this problem is recognised in the report: in 19.8.3 the required volume is given as 55% of the annual South Tyneside landfill. In our view this is another strong argument for cancelling the project.

Our member organisation Friends of the Earth will comment on this aspect of the tunnel Application at greater length.

SECTION 20 Interaction of effects and cumulative effects.

Table 20.3 Operational Phase - Interactions with the Human Environment and Natural Resources: We do not accept the box "Emissions to air" as properly leading to the box "Local improvements in air quality". This is casuistry at best: the overriding effect of an increase in traffic (and increased congestion elsewhere than in the tunnel approach roads) is an increase in pollution probably along the same lines as the admitted increase in noise which is acknowledged in the Statement to exceed 25% in places. As mentioned in our comments on Section 7 we do not accept an anticipated increase in the fuel-efficiency of vehicle engines to be a legitimate modifier, and in any case when pollution is already excessive the intention of all policies must be to reduce it. That people in vehicles who now wait to get into the tunnel with their engines running will no longer be delayed at the entrances is irrelevant: there will be many more of them, and they will leave their engines running in an equally inconsiderate manner when they are stuck due to increased congestion, elsewhere.

We do not accept the box "Increases in road traffic noise for certain properties". The increase due to extra traffic would apply to virtually all properties and in some cases is cited by the consultants as in excess of 25%.

We challenge the box "Contribution to economic growth and development of existing and proposed employment zones on the A19 corridor" as cited in our comments on 2.3.2.2 above. We don't feel that the concept of a cross-River corridor is helpful and development should be local and where necessary east-west, as we set out in the fifth bullet point of 2.2.1 and our comments on 2.2.4. Improved passenger movement across the River can be accomplished by other means. These can be by ferry or extended Metro (or both) as suggested in 2.4 above, and in our comments on Page 6 of the Technical Summary (our Memorandum 3) and again in 2.2.4 above.

Table 20.4 Cumulative Effects During Construction and Operation:

Our queries about the implication of cumulative ecological effects on marine life are raised in our comments under Section 13 above.

This table appears to us to exclude the overriding factors of increased intrusion, congestion, noise and pollution due to extra traffic in perpetuity. This is especially

galling since an opportunity would be lost to actually reduce these effects from present levels if the tunnel scheme were abandoned and an alternative public-transport and demographically aware planning regime were instituted in its place. Thus the local environment is proposed to be made much worse at a bill we put at a nominal £200m (a substantial proportion to the public purse) when a like or lesser sum could make a major improvement in public transport or services.

As an example, the Table entry for Epinay walk assumes that a "retaining wall" will keep out the increased noise and pollution of a large number of additional vehicles, removed from their present route where they were separated by a wide field, to only a few metres from these houses. These nuisances are not featured. The entries which do feature are entitled "Construction noise, Construction dust, Loss of mixed deciduous woodland currently providing a substantial visual screen, and Visual intrusion of retaining wall". This is unconvincing to us and is a cause for despair to the residents.

We emphasise that this table is claimed to cover changes during construction and afterwards. Clearly it has failed in the case of Epinay Walk. We presume the same applies to many and perhaps most other locations.

Note

Letter dated 24.1.98 from Douglas Pigg, then Director of Development Services, South Tyneside Metropolitan Borough Council to Stephen Hepburn MP, and copied by Mr Hepburn to Paul Winch. Many of the assertions in this letter are open to the same criticisms we make of them when they appear in the Statement - e.g. p2 (a) in the letter overlooks pollution caused by tunnel-created congestion elsewhere in the Borough and presumes increases in fuel-efficiency which are speculative and should not in our view comprise a justification for increased traffic. Page 2 (b) includes the words "...findings from a Cross-Tyne Study suggest that the Second Tunnel would not attract long-distance through traffic in either the peak or non-peak period". While the definition of "long-distance" is not specified, we suggest that this paragraph supports Mr Hepburn's reasoning for sponsoring the Tyne Tunnel Bill in Parliament: that he was informed that the tunnel proposal was instigated for local rather than regional benefit. But this assertion is in our view in conflict with the claims made by the then Association of North East Councils (ANEC) to the RPG Inquiry, that the tunnel is to be regarded as a strategic resource. This latter view is also implied in the role given in the Summary to developing the A19 as a trunk route. (Developing this theme we are apprehensive that roads planned in south Northumberland would link with the A19 to comprise not only a through trunk route but a de facto Tyne and Wear ring road. M25 here we come.....).

Mr Winch challenged Mr Pigg's assertion in his third paragraph that ... "most members of the public regard mobility as a fundamental freedom and this shapes their attitude to matters of transport policy and provision..." In a follow-up letter dated 28th August, Mr Pigg disassociated himself from the interpretation that he was claiming that car use is a "fundamental freedom". Readers may infer that this interpretation is implied, however, and it is difficult to avoid the conclusion that this thinking lies behind the proposal. Mr Pigg's second letter (and Mr Winch's letters which occasioned Mr Pigg's responses) can be submitted further to this Objection, if requested.

The above correspondence shows that the tunnel sponsors were aware of local disaffection with their ideas long before the Tyne Crossings Alliance was formed!

ENCLOSURES:

- 1) Letter dated 24.1.98 from Douglas Pigg, then Director of Development Services, South Tyneside Metropolitan Borough Council to Stephen Hepburn MP, and copied by Mr Hepburn to Paul Winch.
- 2) Letter dated 28.8.98, as above.

SUMMARY

The Tyne Crossings Alliance opposes the construction of a second Tyne road tunnel, principally on the basis that it would increase traffic and congestion and increase car dependency in the region.

Alliance members will make their own separate cases to the Inquiry, emphasising their various special interests. This submission raises issues common to all members of the Alliance, and it seeks to make more of the intellectual case against the tunnel in contrast to members' submissions which will be more issue-based.

We object very strongly to the Tyne and Wear Passenger Transport Authority (PTA)'s representation of the scheme for the past several years, through very extensive promotional material and many events, as a "given" with the implication that it will proceed regardless of what people think. In fact the scheme is and remains a proposal - and we believe a very bad and ill-thought-out proposal at that. The initial study of alternatives to a road tunnel on the present alignment were derisory, and the alternative of a Metro extension from South Shields to North Shields for instance appears to have been excluded from the study. This fails to meet Government requirements for the evaluation of projects of this size and impact. The PTA's submission to a related Inquiry, when asked about the Metro option, was that "the gradients would be too steep". This is incorrect.

Projections of traffic levels are false in that the "do nothing" assumption is not realistic. Construction of the tunnel would be a statement of confidence in the desirability - let alone viability - of continuing growth in future traffic levels, whereas the alternative is to take active measures to restrain traffic growth. Without this option factored in to the PTA's statistics their comparisons are meaningless.

Other assumptions in the PTA's submissions are likewise invalid: local residential roads already suffering from excessive traffic are not "under capacity". They are indeed over-capacity and the prospect of a further increase in traffic is horrendous. The cost of upgrading local trunk roads is not included in the claimed £138 million price for the tunnel. Nor is the cost of a new feeder road through the Hebburn to Pelaw Riverside Park which residents along Victoria Road and the Felling by-pass may seek if the tunnel is built. Although we understand that Gateshead MBC has pulled out of this scheme twice, South Tyneside MBC appears to be still in favour and Alliance members consider this to be a likely further commitment if the tunnel were built. This road would destroy the amenity of an outstanding, traffic-nuisance-free semi-rural feature within an urban landscape.

Local estates are beset by cars parked on pavements. Police officers do it themselves. Increased traffic would increase pressure on parking and worsen this nuisance unless the Police can be persuaded to prosecute offenders. Then road space will be even more at a premium and a proposal to increase traffic in this circumstance is in our view doubly perverse.

Claims of economic benefit made by the PTA and two Borough Councils are in our

view unsubstantiated. Economic growth is not a self-evident good; indeed growth in car numbers is uncannily close to the aetiology of cancer cells. Benefit from growth can not be taken for granted and has to be proved case by case. Some growth leads to urban sprawl, devalued jobs, increasing social exclusion and unacceptable travel patterns besides loss of countryside and urban amenity. Economic growth where it is proven to be beneficial must be de-linked from traffic growth. This proposal is designed to have the opposite effect.

The proposal is beset by contradictions: the original claim was that the tunnel would be for local people to access jobs and amenities across the River. We submit that the latter justification amounts to post hoc planning and is improper. As mentioned already, we argue that the jobs justification is questionable at best, and substantial communities exist on both sides of the River adjacent to employment catchment areas. If anything, "tidal flows" to be expected across the River will be the opposite of those claimed (as is already claimed by Alliance observers on the spot). There may prove to be more new jobs created south of the River. Why spend over £200 million to enable South Tynesiders to travel for much needed employment to North Tyneside when the greater number of new jobs may arise to the south? We submit that the concept of an "A19 Corridor" which is the alternative regional justification for the tunnel, while well established in planning discussions, is illogical if it is predicated on a new Tyne crossing. The concept of transport-led economic development is surely thoroughly discredited and in particular local businesses need a matrix of connections with an emphasis on local supply. Traffic corridors are notorious for taking business out of regions and favouring transport-led undertakings which are environmentally damaging and unsustainable. In our view the local and regional cases for supporting the tunnel are incompatible.

A further anomaly is the PTA's claim of reduced congestion etc. when obviously increased traffic has the reverse effect, and a main selling point of the North East is its relatively unspoilt countryside. But the main threat to that countryside is burgeoning traffic, out-of-town living, ever-heavier fast traffic on rural roads (where there may not even be pavements) and a general degrade of the North East's main asset. Business promoters such as OneNorthEast try to sell the region as having relatively low traffic densities but then support this project which would increase traffic densities. This is perverse.

We challenge the PTA's costings as excluding major elements such as the road enhancements required at public expense already mentioned, the PTA's own recent admissions of rises in consultants' and engineers' costs, an extra commitment to compensating local residents after the intervention of Stephen Hepburn MP (this could further increase if various claims are successful), inflation since the 1999 published estimates, probable engineering cost overruns in view of the bad geology of the route and other considerations, additional costs which could be very large for disposing of waste on land, and undeclared financing costs.

Developing this last point, many Alliance members are extremely concerned at the prospect of PFI schemes in general, and the prospects for this one in particular. There is another inherent contradiction here: "the market" is supposed to specialise in risk management, but risk in political projects like this is in the hands of local government and Parliament, which can both change complexion and sentiment overnight. So financial backers will take the worst case scenario and the public will reap no benefit. Further, to have a private consortium committed to increasing traffic in order to maximise its profits goes against the Government's existing commitment to limit traffic increase and divert journeys to other modes. A further risk for a financial

backer is fuel prices and the effects a major price rise would have on traffic, and therefore on the profitability of its investment. The conclusion is that private funding will only be available on punitive terms, and we feel that local residents should not be taken to the cleaners in this way. We note that European funding is being sought, and question whether a Skye Bridge fiasco - where the public paid for the bridge but an American bank takes the profits - is not already in train and needs to be stopped before more damage is done and more expense is incurred.

The TWPTA (as distinct from the Port of Tyne Authority) does not to our knowledge have a licence to dump contaminated spoil at sea and local, and no doubt other, fishermen would be opposed to the granting of such a licence. The cost and consequences of disposing of this material on land are very serious and potentially expensive considerations. In the short-term there would be the problem of transport, while the long-term effect of the pollutants is unknown. The curtailment by this action of available sites for further disposals represents a high environmental cost.

We challenge various tables in the Environmental Statement including one which factors in an "improvement" in air quality, when clearly the overall effect of increasing traffic is the opposite. The conclusion has therefore to be the opposite of that claimed. Noise aggravation is also claimed as a local phenomenon, when due to the general increase in traffic it must be a general outcome. The effect on some residents would be horrendous, while that on all residents must be a deterioration in their present living standards with reduced earning capacity due to increased stress and ill health, and increased claims on the health services, as a result of increased pollution from fumes and noise, and the associate physical intimidation arising from excessive traffic.

We emphasise that although this project is designed to benefit car users, every fit man woman and child, and many unfit ones too, also walk. They would be fitter if they walked more, and also cycled, and took other exercise in the open air. This comment includes car users when they are not in their cars. So we end with a further anomaly: the project is designed to increase traffic and improve access by car, but those places people need to reach are degraded and in some cases cut off (playing areas for children come to mind here) by the very project which is claimed to enhance access. We suggest that an "investment" of over £200 million which lessens the quality of life in the locality, and the region, is folly.

We submit that the project should be stopped before more damage is done, and before more expense is incurred. As mentioned, there are alternatives to a road tunnel which many members of the Alliance would support if the need for additional cross-River capacity can be demonstrated.

END OF TYNE CROSSINGS ALLIANCE PROOF OF EVIDENCE.