

Objection reference: TWA/02/APP/03/OBJ/396  
**Document reference 396/0/1**

**Transport and Works Act 1992**  
**Application for the proposed River Tyne (Tunnels) Order**

*'Proof of Evidence' submitted by the North East Combined Transport Activists Roundtable (NECTAR).*

**1 NECTAR and its role**

- 1.1 NECTAR is an open, voluntary, umbrella body, established to provide a forum in which the many organisations with an interest in transport in all its forms, can develop a coordinated view on contemporary transport issues. NECTAR provides opportunity for the exchange of news, studies and information. NECTAR covers the same geographical area as, and provides an effective voice for dialogue with the Government Office for the North East, One North East, the North East Assembly and similar regional bodies concerned with transport.
- 1.2 NECTAR does not pretend to be professionally expert in the field of transport. Rather, it seeks to bring the views of the transport user to the fore, applying informed common sense to the development of cost effective, affordable solutions to the transport problems and developments of the day. The NECTAR goal is a sustainable, inclusive transport system which will allow everyone to make the journeys they need for work, business or pleasure without undue dependence on the use of cars or lorries.
- 1.3 The NECTAR position is essentially as set out in its 'Letter of Objection' and 'Statement of Case'. The position reflects the Government's *strong presumption against new or expanded transport infrastructure ... (MacDonald, DETR GM/004247/01)* with the recognition that *there is a place for road building, but it is no longer the first option ( A New Deal for Trunk Roads in England, DETR, 1998)*.
- 1.4 The NECTAR position is expanded in the present 'Proof of Evidence' under the headings of traffic growth predictions, economic regeneration claims, induced traffic problems, alternative solutions and the Governments overarching objectives. The issues identified are collected together consecutively in Section C, at the end of the submission.

## 2 Traffic growth predictions

- 2.1 The proposed new tunnel would increase the declared tunnel capacity from 24 000 vehicles per day to 80 000 vehicles per day, an increase equivalent to 7% per year for the next 30 years (Update Issue 6, June 2002, TWPTA). The number of vehicles forecast to be using the two tunnels is 55 000 per day by 2031, that is a growth rate of 4% per year relative to the design capacity of the existing tunnel or using the stated current usage of 35 000 vehicles per day, 1½% each and every year. Providing for unquestioned growth in this way is the classic but discredited *predict and provide* approach; the M25 motorway represents a widely accepted demonstration of the failure of that approach. The *predict and provide* approach, moreover, has long been discarded by Government (A New Deal for Trunk Roads in England, DETR, 1998); *simply predicting future traffic levels and building new roads to accommodate traffic growth is not a solution.*
- 2.2 As important as the fact that *predict and provide* has been discredited, is the fact that the probable car traffic growth has been much exaggerated in the case proposed for a new tunnel. The graph on Page 4 of the non-technical summary of the Environmental Statement (Environmental Statement, Non-technical Summary, TWPTA/Arup, May 2002) shows that since 1985 there has been significant growth only in the two or three years around 1995 and the mean rate has been only some 0.75%. This fits with the national trend which shows the years around 1995 to have been peak years for growth in motor car traffic and records effectively no growth at all between 1999 and 2000 (Transport Statistics Great Britain: 2002 Edition, DfT, 2002). This is not surprising, as the Government is, after all, committed to reducing road traffic (Road Traffic Reduction (National Targets) Act, 1998):  
*It shall be the duty of the Secretary of State, ..., with the aim of reducing the adverse environmental, social and economic impacts of road traffic, to set and publish in a report targets for road traffic reduction in England, Wales and Scotland.*  
and, through its integrated approach, to ensuring that (A New Deal for Transport, DETR 1998, as reported in Guidance on Methodology for Multi-Modal Studies, DETR 2000:  
*transport and planning work together to support more sustainable choices and reduce the need for travel.*
- The proposers of the new tunnel have not published any justification for basing their forecasts on an assumed annual growth rate of over 4% until 2016 for the two tunnels combined (Graph on Page 4 of the non-technical summary of the Environmental Statement, May 2002) despite the Tyneside Area Multi-Modal Study (Tyneside Area Multi-Modal Study, Study Report, Arup Scott Wilson, 2002) having forecast less than 2% growth in cross Tyne traffic over the same period. NECTAR is concerned that the impact of much lower, more realistic traffic growth rates on the cost effectiveness of the proposed tunnel appears not to have been reported. NECTAR suggests, therefore, that the financial robustness of the new tunnel proposal must be in doubt.
- 2.3 NECTAR has learned recently that the new edition of the Treasury Green Book is understood (Note to Transport 2000 from DfT, private correspondence, 2003) to require the use of a much lower discount rate for calculating the cost benefit of road building projects; NECTAR would expect this impact to have been evaluated and reported before the proposed new tunnel is developed any further.

2.4 NECTAR is concerned that if serious consideration has been given to restraint and management measures as an alternative to new tunnel building, then the findings have not been made public:

*The study also reviewed options to manage traffic growth, rather than an increase in capacity on the local road network by, for example, traffic restraint measures and improvements to public transport.*

This in a section headed 'Where should the new crossing be located' suggests very much that lip service only was being paid to the alternatives (Environmental Statement, Non-technical Summary, TWPTA/Arup, May 2002). Evidently, a multi-modal range of options has not been developed and presented for scrutiny in a way which would allow direct comparison of costs and benefits.

In fact, the dramatic potential of tolls, charges and parking charges to contain traffic growth has been set out by the Government in its consultation paper (Breaking the Logjam, DETR, 1998) and graphically illustrated in its first report under the Road Traffic Reduction (National Targets) Act 1998 (Tackling Congestion and Pollution, DETR, 2000) and more immediately by the Tyneside Area Multi-Modal Study (Tyneside Area Multi-Modal Study, Study Report, Arup Scott Wilson, 2002). Moreover, the reported congestion at the portals of the existing tunnel lasts for only a small part of the day and is evidently acceptable to the 70% of tunnel users (Update Issue 6, June 2002, TWPTA) who use the tunnel for short local journeys. Otherwise there would be no significant growth in the use of the existing tunnel to forecast and certainly not the 40% shown on Page 4 of the Environmental Statement Non-technical Summary (Environmental Statement, Non-technical Summary, TWPTA/Arup, May 2002).

2.5 The proposed new tunnel would be subject to a toll but the level of the toll would be set by the concessionaire (Update Issue 4, June 2001):

*The PTA wants to see tolls set as low as possible*

but this is not within the gift of the PTA. Moreover, should the doubts set out above prove valid, it will become necessary during the course of the contract, either to increase the toll or to fund the operation of both tunnels out of taxation. The PTA's assertion that (Update Issue 4, June 2001):

*Once set, the toll will not rise faster than the rate of inflation*

appears wholly unworkable; another promise not within the gift of the PTA to deliver and which has no financial justification. Again, therefore, NECTAR suggests that the financial model for the proposed new tunnel appears inadequately robust.

2.6 The level of toll would undoubtedly be set by the concessionaire to maximise the return on the capital employed. This approach would imply maximising the toll per vehicle and maximising the amount of car traffic carried; the former seems contrary to the Government's intent to increase social inclusivity and the latter contrary to the Government's duty to reduce traffic, to support more sustainable travel choices and to reduce the need to travel. NECTAR note that the Environmental Statement is flawed in that it is predicated on a toll of £1.40 per car, again without assessing the impact of either a higher or lower toll, even within the range of £1.10 to £1.55 admitted by the study to be possible (Update Issue 6, June 2002).

2.7 In view of the uncertainties set out above, NECTAR would urge that all the options and alternatives should be fully developed, appraised and presented to the public before the proposal to build a new tunnel is allowed to proceed further. This section of the NECTAR submission is concerned with fiscal alternatives; public transport and 'need to travel' options are discussed in later sections. The need for this approach is given further emphasis by the fact that promoting the use of car traffic reduces the mobility of the bulk of the population – those without a car, those under 17, those too old or infirm to drive and those in families with a car parked at the place of work of one of its members.

2.8 NECTAR concludes from the foregoing argument that:

- ❑ The credibility of the traffic growth forecasts reported by the PTA is doubtful and that the impact of a low forecast in line with the experience of the last 15 years, should be evaluated and reported.
- ❑ The financial robustness of the proposed project has yet to be demonstrated.
- ❑ The apparent conflicts with Government policy on integrated transport policies should have been recognised and clarified for the public.
- ❑ The declared intention to limit rises in the toll, once set, to rises in inflation is unworkable.
- ❑ The alternatives to tunnel building should be fully appraised and the results presented to the public.

### **3 Economic regeneration claims**

- 3.1 NECTAR has been extremely disappointed to find that the ongoing work of the Government's Standing Advisory Committee on Trunk Road Assessment (SACTRA) has apparently passed by the proposers of the new tunnel. SACTRA has found that the link between transport investment and wider economic impact is at best, tenuous (Transport and the Economy, SACTRA, 1999):

*Empirical evidence of the scale and significance of such linkages is, however, weak and disputed.*

The proposers imply (Update Issue 4, June 2001, TWPTA) that the new tunnel would remove a barrier between people and jobs but do not appear to have answered adequately, in the Environmental Statement (Environmental Statement, TWPTA/Arup, 2002) or elsewhere, even the obvious question of how many of the jobs predicted for sites along the A19 ribbon have simply been transferred from elsewhere.

- 3.2 NECTAR is of the opinion that it is of paramount importance for the proposers to demonstrate how many wholly new jobs a new tunnel would sustain which would not otherwise become available. Moreover, it appears incumbent upon the proposers to demonstrate how their approach is compatible with the Government's commitment to reducing the need to travel. In the meantime NECTAR note that the Environmental Statement says (Environmental Statement, TWPTA/Arup, 2002) the The Tyne and Wear Economic Strategy forecasts that:

*Between 1999 and 2030, the number of employee jobs in Tyne and Wear is likely to increase by approximately 79 000 jobs. It is not possible to determine exactly what proportion of this total would be achieved, or how many can be attributed to the opening of the New Tyne Crossing'.*

The Environmental Statement concludes after a simple statement of sites apparently available that:

*It is difficult to accurately quantify the benefits that would be accrued to the economy as a result of the construction of the New Tyne Crossing*

And falls back on the act of faith that:

*On the balance of probabilities, the overall effect will be beneficial.*

This seems to NECTAR to be a wholly unconvincing background to the PTA claim (Update Issue 7, January 2003, TWPTA) that the proposed new tunnel would be a:

*major benefit to communities on both banks of the river.*

- 3.3 It seems important to NECTAR to note that the A1 North of Newcastle Multi-Modal study concluded that (A1 North of Newcastle Multi-Modal Study, Summary and Recommendations, Scott Wilson Arup, 2002):

*The A1 is not currently or likely to be a significant inhibiting factor on economic growth in Northumberland, and no evidence has been found to suggest wider economic benefits would arise from completing the dualling of the A1*

A further and powerful local example of the point made repeatedly by SACTRA, since the A19 ribbon feeds the A1.

3.4 SACTRA (Transport and the Economy, SACTRA, 1999) has also illustrated well the 'two way road' phenomenon, making the point that easy access whilst perhaps making the possibility of a base more desirable, may equally remove the need for a base in the area at all. In similar vein, the suggestion is made by the PTA that a new tunnel would make jobs along the A19 ribbon available to those (with a car) who live south of the Tyne (Update Issue 4, June 2001, TWPTA):

*The A19 corridor will be the focus of major investment over the next few years creating thousands of jobs. South Tyneside has one of the highest unemployment rates in the UK and no land suitable for development. The New Tyne Crossing will remove a major barrier to linking people with job opportunities*

At the same time, the proposers of the new tunnel acknowledge that unemployment is also high in North Tyneside; the need for further understanding is evident. NECTAR note that jobs created in 'the next few years' will, necessarily, be created without the presence of the proposed new tunnel.

3.5 As importantly, there is no apparent consideration given to the sacrifice of community which the proposed tunnel demands, in order to allow car dependent access to a ribbon development of factories of unknown longevity. 'No land suitable for development' (Update Issue 4, June 2001, TWPTA) suggests to NECTAR a particularly unimaginative view of the areas south of the Tyne; integrated planning and land use concepts would suggest an investigation of the potential of the whole area between the rivers Tyne and Wear to be more appropriate than comment restricted to artificial borough boundaries. The recent history of this former mining area suggests that development opportunities should be at least as prolific as along the A19 ribbon through former mining areas north of the river. In the meantime, NECTAR note from newspaper advertisements (Shields Gazette, 24 Jan 03) that South Tyneside Council is attempting to dispose of brownfield sites on the route of the proposed tunnel. This demonstrates that such sites do indeed exist and can be found in the heart of the community, where they may well attract grant support from the various regeneration agencies.

3.6 NECTAR notes that the promoters of the proposed new tunnel have chosen not to develop and publish a separate Economic Impact Report in which the economic arguments are addressed with rigour. SACTRA (Transport and the Economy, SACTRA, 1999) recommended such an approach as long ago as 1999 and the Government in its response said (The Government's Response to the SACTRA Report on 'Transport and the Economy', HMSO, Cm 4711, 2000):

*The Department will provide advice on the requirement for promoters of transport schemes to draw up an economic impact report, as recommended by SACTRA.*

NECTAR consider that the failure to develop such an independent report has contributed in large measure to the weakness of the wider economic impact arguments advanced in the Environmental Statement. Such a report should now be prepared and published before further work on the proposed tunnel is committed.

3.7 NECTAR conclude from the foregoing argument that:

- The case for claiming significant economic benefit to result from the availability of a second road tunnel has not been presented.
- The potential for bringing jobs to the place where people need them should be reappraised.
- Unlike the new tunnel proposal, money spent on improving the public transport network across that area would have more chance of fostering sustainable economic development without the consequent destruction of communities.

#### 4 Induced traffic problems

- 4.1 NECTAR was concerned to read that as recently as June 2002, the PTA were of the opinion that the phenomenon of induced traffic on new roads was an invention of those who oppose the proposed new tunnel (Update, Issue 6, June 2002, TWPTA):

*Those who oppose the new tunnel argue that more roads create more traffic*

This view implies that the PTA in this respect too has been unaware of the SACTRA findings and has failed to appreciate the evidence represented by the Tyneside western bypass (Trunk roads and the generation of traffic, SACTRA, 1994):

*Induced traffic can occur, probably quite extensively*

*These studies demonstrate convincingly that the economic value of a scheme can be overestimated by the omission of even a small amount of induced traffic. We consider this matter is of profound importance to the value for money assessment of the road programme.*

The extent to which traffic would be induced would depend on the level of toll set and hence on the operating economics of the concessionaire. The phenomenon is clearly of fundamental importance to the economics of the proposed tunnel.

- 4.2 Induced traffic, of course, is not only an economic problem for the proposed tunnel itself, it is a profound problem for the whole road network around the tunnel and its access routes. Even the Environmental Statement (Environmental Statement, TWPTA/Arup, 2002) suggests that by 2021 Tynemouth Road to the west of the A19 would have suffered a traffic increase of 65% and Wallsend Road east of the A19 a growth of 79%. These are given as examples; NECTAR is of the view that a comprehensive review is essential to identify the extent to which the whole road network and those who live in and around it would be put at risk by the proposed tunnel. Such a review would have to include the effects on severance, pollution, journey times, safety and quality of life of the communities and people who would be affected even though they would probably not themselves use the tunnel. NECTAR are of the view that the cost of overcoming the problems caused by the tunnel project should be identified and charged to the tunnel project; they should not become a burden on the public purse.

- 4.3 One of the concerns for NECTAR in this respect would be road safety in general and child pedestrian safety in particular. Britain is significantly worse off in the latter respect, than any of the major European countries, the child pedestrian fatality rate being twice that in Germany. In 'Tomorrows roads: safer for everyone' (Tomorrows roads: safer for everyone, DETR, 2000) the Government sets out its road safety strategy and casualty reduction targets for 2010. The Government includes in that document the statement:

*Children should be able to walk and cycle in safety. They need the freedom to use the roads for their social development and the exercise for their general health and fitness.*

This principle seems to NECTAR to be completely at variance with the traffic growth which the proposed tunnel would foster and induce in the domestic and community road network in the tunnel access area. NECTAR would expect, therefore, a full appraisal of the situation in the affected communities before the proposed tunnel project was allowed to proceed further. Since it is expected to have such a profound effect on community roads, there is a clear obligation on the study to relate the consequences of its proposed tunnel to the Government's (Tomorrows roads: safer for everyone, DETR, 2000):

*target for reducing deaths and serious injuries to children by 50% by 2010.*

4.4 NECTAR concludes from the foregoing argument that:

- ❑ Induced traffic is a real and accepted consequence of road expansion. It has a major impact on the economics of construction projects and the proposed tunnel would be no exception.
- ❑ Traffic would also be induced and fostered in the communities adjacent to the proposed new tunnel and its access points.
- ❑ The cost of mitigating the consequent damage to these communities should be a charge on the proposed new tunnel and not on the public purse.
- ❑ Specifically the impact of the traffic induced in adjacent communities on road safety in general and on child pedestrian fatalities in particular should be investigated.

## 5 Alternative solutions

- 5.1 Whilst congestion may be the 'single biggest issue at the Tyne tunnel', (Update Issue 7, January 2003, TWPTA), NECTAR question the fiscal prudence of providing such overcapacity that there is no congestion at peak times. Rather, variable tolls should be used to regulate demand and improve the journey time reliability for all.
- 5.2 Avoiding the need to wait for access to the tunnel seems to be the aspect of congestion which is of concern to the tunnel proposers but by contrast a 10 minute interval between Metro trains, ie a 10 minute wait for passengers, is generally deemed to be an excellent service. Clearly there is a disparity of standards here. NECTAR suggest that the Metro model gives a guideline of 10 minutes wait as an 'excellent service' but the peak hour motor car drivers appear prepared to accept a longer wait, since they still choose to use the tunnel with its claimed peak-time delays of 20mins or more. NECTAR note that there are very few vehicles visible in the pictures chosen to justify the need for a new crossing in the Environmental Statement, Non-technical Summary (Environmental Statement, Non-technical Summary, TWPTA/Arup, May 2002) and take this to represent the situation during the bulk of the day and night.
- 5.3 These are not hypothetical debating points; NECTAR submit that a variable toll in combination with an accepted wait-time for access could be managed to provide better opportunity for bus or no car lanes in the approach areas. NECTAR note that the PTA has now recognised the potential value of bus lanes (Update Issue 7, January 2003, TWPTA) and suggest that a full evaluation of the potential of this alternative strategy should be required before the new tunnel project proceeds further.
- 5.4 NECTAR has been disappointed at the apparent failure to explore fully the public transport alternatives to the construction of the proposed new tunnel, especially as the new approach to appraisal (Applying the Multi-Modal New Approach to Appraisal to Highway Schemes, DfT 2001):
- encourages designers and project managers to develop proposals that offer improvements across all of Central Government's five main objectives for transport – environment, safety, economy, accessibility and integration*
- The Government has stressed (Planning Policy Guidance Note 13 – Transport., DTLR, 2001) that particular emphasis should be given to the need to explore a full range of alternative solutions to problems, including solutions other than road enhancement. This contrasts with the Environmental Statement, which says that (Environmental Statement, TWPTA/Arup, 2002):
- Possible policy approaches which could be adopted were considered in a 'broad-brush' way and did not attempt to undertake a measurement of the economic and social costs and benefits of the measures proposed.*
- NECTAR concludes that there is much work to be done, published and debated about the contribution which bus, Metro Train and Metro Tram could make before it can be concluded that a new tunnel is needed for motor cars. Anything less would be counter to the vision set out in the Governments 10 Year Plan (Transport 2010: The 10 year Plan, DETR, 2000). NECTAR would be keen to contribute to such work.

5.5 Whilst the PTA now reports some recognition of the value of buses (Update Issue 7, January 2003, TWPTA), the recent report by the Commission for Integrated Transport (CfIT) shows how far the PTA still has to go. The CfIT have shown that (Public subsidy for the bus industry and associated press and fact sheets, CfIT, 2002):

*The bus can deliver change fast, cheaply and with enormous impact. It must be at the heart of the delivery of integrated transport.*

Indeed, the CfIT report highlights a major role for local authorities to play in this respect and suggests that:

*Greater political will is needed locally coupled with an incentive regime .*

The Chairman of the Commission says that (Public subsidy for the bus industry and associated press and fact sheets, CfIT, 2002):

*Unless we bring better incentives and more public funding to the bus sector, we will miss the best, the most obvious and cheapest opportunities at our disposal for providing alternatives to the car.*

NECTAR is of the opinion that this finding demonstrates a fundamental flaw in the argument advanced in favour of the proposed new tunnel.

5.6 Of course, the CfIT work was published after the present tunnel construction order application was lodged but the CfIT report does now exist and NECTAR suggest that using the CfIT findings, the potential for bus services to get people to the available jobs should be radically investigated before any further work on the proposed tunnel is allowed to proceed.

5.7 NECTAR concludes from the foregoing argument that:

- ❑ Insufficient consideration has been given to the possibility of managing the peak time traffic through the existing tunnel by a combination of variable tolls and traffic management techniques.
- ❑ The PTA should seek to gain general acceptance of comparable waiting times for public transport services and tunnel access.
- ❑ All alternatives to tunnel building should be fully appraised and the results presented to the public.
- ❑ There should be a full evaluation of the potential of buses to remove the pressure of local car journeys from the tunnel traffic at peak times.

## 6 The Government's overarching objectives

- 6.1 NECTAR find it wholly unacceptable that people's homes, schools, places of work, green space and recreation facilities should be demolished in order to enable motorists to save a few minutes on their journeys to and from work at peak times. The Tyneside Area Multi-Modal Study found that (Tyneside Area Multi-Modal Study, Phase 7 Strategy Appraisal, Arup Scott Wilson, 2002):

*There would be the loss of land and property including the Riverside park, commercial and industrial properties, community facilities and a public house.*

That seems to summarise the case for the application being made by the PTA. To that add the pollution, severance, noise, and danger which are inevitable during the construction years and the noise, danger and air pollution in perpetuity thereafter and the price is clearly too high. To then put the onus of proof on to home owners to (Update, Issue 6, June 2002, TWPTA):

*demonstrate that the reduction in value of their property is attributable to the New Tyne Crossing*

appears to NECTAR to be very unfair, especially as the arbitrator is apparently the PTA. It does, however, demonstrate that the PTA recognises the damage to the community and its residents which the proposed new tunnel would bring. Being:

*convinced that the PTA is doing everything it can to address the issue of property devaluation*

(Update, Issue 6, June 2002, TWPTA) does not mean that sufficient is being done. NECTAR do note however, that it is within the power of the PTA to stop the proposed new tunnel project, thus directly addressing the issue of property devaluation.

- 6.2 Illustrating the proposal in this way has been chosen by NECTAR to bring into focus the key importance of the type of community wanted by the people whose lives would be radically affected by the proposed new tunnel, in short people must take precedence. NECTAR seeks neither to speak on behalf of such people directly nor to consider the many weaknesses in the Environmental Statement; those contributions to the Inquiry will be made by others. NECTAR is however, concerned that the new tunnel proposal appears not to have been appraised in the rounded way envisaged by the Government (A New Deal for Transport, DETR, 1998, codified in the Guidance on Methodology for Multi-Modal Studies (GOMMMS), DETR, 2000).

- 6.3 These documents (A New Deal for Transport, DETR, 1998 and codified in the Guidance on Methodology for Multi-Modal Studies (GOMMMS), DETR, 2000) set out the Government's five over-arching criteria for transport as;

*Integration – ensuring that all decisions are taken in the context of our (the Government's) integrated transport policy*

*Safety – to improve safety for all road users*

*Economy – supporting sustainable economic activity in appropriate locations and getting good value for money*

*Environmental impact – protecting the built and natural environment*

*Accessibility – improving access to everyday facilities for those without a car and reducing community severance*

The envisaged approach to appraisal under each of these headings appears not to have been followed, particularly in that questions of integration, safety, accessibility, severance and choice have not been adequately considered and the environmental statement will be shown by others to be deeply flawed. The importance of community and amenity do not appear to have been recognised.

6.4 The Environmental Statement, Non-technical Summary (Environmental Statement, Non-technical Summary, TWPTA/Arup, 2002) is replete with statements such as:

*There are **plans to** undertake landscape and footpath improvements ..., A new bus lay -by and additional car parking **could be** provided ..., There is also the **intention** to provide improved access ...*

However, NECTAR has been unable to find a positive commitment to any of these schemes or evidence that the costs involved would be met by the proposed tunnel project. NECTAR submit that without such commitment, these empty promises are misleading and should not be allowed in the Environmental Statement or its non-technical summary. Moreover, NECTAR has been unable to find any substantial evidence that the project proposers have taken note of the imperative in GOMMMS (Guidance on Methodology for Multi-Modal Studies, DETR 2000):

*The environmental protection objective involves **reducing** the direct and indirect impacts of transport facilities and their use on the environment of both users and non -users.*

It should be noted that the emphasis on **reducing** is placed by the authors of GOMMMS and was not added by NECTAR.

6.5 NECTAR concludes from the foregoing argument that:

- ❑ No meaningful attempt has been made to establish or compare the losses which the many communities affected by the proposal would suffer with the gains claimed for motorists
- ❑ Insufficient consideration has been given to questions of road safety, accessibility and integration.
- ❑ Alternative solutions have not been developed and consequently have not been brought into comparison in a common system of appraisal.
- ❑ There is no evidence of commitment to the mitigating measures mentioned or of such costs having been included in the budget for the proposed project.

**C The issues**

Collected together, the issues identified in the foregoing sections are:

- 1 The credibility of the traffic growth forecasts reported by the PTA is doubtful.
- 2 The impact of a low traffic growth forecast, in line with the experience of the last 15 years, should be evaluated and reported.
- 3 The financial robustness of the proposed project has yet to be demonstrated.
- 4 The apparent conflicts with Government policy on integrated transport should have been recognised and clarified for the public.
- 5 The declared intention to limit rises in the toll, once set, to rises in inflation is unworkable.
- 6 The case for claiming significant economic benefit to result from the availability of a second road tunnel has not been presented.
- 7 The potential for bringing jobs to the place where people need them should be reappraised
- 8 Unlike the new tunnel proposal, money spent on improving the public transport network across that area would have more chance of fostering sustainable economic development without the consequent destruction of communities.
- 9 Induced traffic is a real and accepted consequence of road expansion. It has a major impact on the economics of construction projects and the proposed tunnel would be no exception.
- 10 Traffic would also be induced and fostered in the communities adjacent to the proposed new tunnel and its access points
- 11 The cost of mitigating the consequent damage to these communities should be a charge on the proposed new tunnel and not on the public purse.
- 12 Specifically the impact of the traffic induced in adjacent communities on road safety in general and on child pedestrian fatalities in particular should be investigated.
- 13 Insufficient consideration has been given to the possibility of managing the peak time traffic through the existing tunnel by a combination of variable tolls and traffic management techniques.
- 14 The PTA should seek to gain general acceptance of comparable waiting times for public transport services and tunnel access.
- 15 The alternatives to tunnel building should be fully appraised and the results presented to the public.
- 16 A full evaluation of the potential of buses to remove the pressure of local car journeys from the tunnel traffic at peak times should be made
- 17 No meaningful attempt has been made to establish or compare the losses which the many communities affected by the proposal would suffer with the gains claimed for motorists
- 18 Insufficient consideration has been given to questions of road safety, accessibility and integration.
- 19 Alternative solutions have not been developed and consequently have not been brought into comparison in a common system of appraisal.
- 20 There is no evidence of commitment to the mitigating measures mentioned or of such costs having been included in the budget for the proposed project.

**References****Section 1**

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**Section 6**

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