

*Objection reference: TWA/02/APP/03/OBJ/396*  
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**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).*

**Summary Statement**

**S1 NECTAR and its role**

S1.1 NECTAR is a voluntary body, providing a forum in which interested organisations can develop a coordinated view on contemporary transport issues. The NECTAR position reflects the Government's strong presumption against expanded transport infrastructure, accepting the Government view that road building is no longer the first option.

S1.2 NECTAR's 'Proof of Evidence' is presented under the headings of traffic growth predictions, economic regeneration claims, induced traffic problems, alternative solutions and the Governments overarching objectives. The issues raised by the NECTAR submission are set out in brief at the end of each section and listed consecutively at the end of the full statement.

**S2 Traffic growth predictions**

- S2.1 The proposed new tunnel would increase the tunnel capacity at a rate equivalent to 7% per year for the next 30 years. The number of vehicles using the two tunnels is forecast to grow at 4% per year. Providing for growth in this way is the *predict and provide* approach, long discredited and discarded by Government.
- S2.2 Since 1985 there has been significant growth in tunnel traffic only around 1995 and the mean annual rate has been only some 0.75%, a finding which fits with the national trend. The Government is committed to reducing road traffic and the need for travel; the proposers of the new tunnel have not published any justification for basing their forecasts on an annual growth rate of over 4% until 2016, for the two tunnels. NECTAR suggests that a more realistic traffic growth rate would put the financial robustness of the new tunnel proposal in doubt.
- S2.3 NECTAR is concerned no serious consideration of traffic restraint and management has been made public although the dramatic potential of tolls, charges and parking charges to contain traffic growth has been set out by the Government and more immediately by the Tyneside Area Multi-Modal Study. Moreover, a multi-modal range of options has not been presented for scrutiny to allow direct comparison of costs and benefits.
- S2.4 The proposed new tunnel would be subject to a toll set by the concessionaire. The PTA says it wants to see tolls set as low as possible but how low is possible is not stated. The doubts identified by NECTAR, suggest that it may become necessary during the course of the contract, either to increase the toll or to subsidise the operation of both tunnels out of taxation. The PTA's assertion that the toll will not rise faster than inflation, appears to be a promise not within the gift of the PTA to deliver. Again, therefore, NECTAR suggests that the financial model for the proposed new tunnel appears inadequately robust.
- S2.5 NECTAR urges that all the alternatives be fully developed, appraised costed and presented to the public before the proposal to build a new tunnel is allowed to proceed further.

**S3 Economic regeneration claims**

- S3.1 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.
- S3.2 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. The Tyne and Wear Economic Strategy forecasts that between 1999 and 2030, the number of jobs in Tyne and Wear is likely to increase by approximately 79 000 but that it is not possible to determine what proportion of this total would be achieved, or how many can be attributed to the proposed new tunnel. Crucially, the Environmental Statement concludes that it is difficult to quantify accurately the benefits that would be accrued to the economy as a result of the construction of the proposed tunnel!
- S3.3 SACTRA has illustrated the 'two way road' phenomenon, making the point that providing easy access may equally remove the need for a base in the area at all. The PTA suggests that a new tunnel would make jobs north of the Tyne available to those (with a car) who live south of the Tyne. At the same time, the proposers acknowledge that unemployment is also high in North Tyneside; the need for further understanding is evident.
- S3.4 No apparent consideration has been given to the sacrifice of community which the proposed tunnel demands. 'No land suitable for development' suggests to NECTAR a particularly unimaginative view of the areas south of the Tyne and NECTAR notes that South Tyneside Council is attempting to dispose of brownfield sites on the route of the proposed tunnel, thus demonstrating that such sites currently exist in the heart of the community.
- S3.5 NECTAR urges that the promoters of the proposed new tunnel should publish a separate Economic Impact Report, as recommended by SACTRA, in which the economic arguments are addressed with rigour.

**S4 *Induced traffic problems***

- S4.1 SACTRA has shown induced traffic to be of profound importance to the value for money assessment of road schemes. The phenomenon is clearly of fundamental importance to the economics of the proposed tunnel.
- S4.2 Induced traffic is also a profound problem for the whole road network around the tunnel and its access routes. A comprehensive review is essential to identify the extent of the risk. 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.
- S4.3 NECTAR is particularly concerned about child pedestrian safety. The Government has set out its road safety strategy, concluding that children should be able to walk and cycle in safety. This principle seems to NECTAR to be completely at variance with the traffic growth which the proposed tunnel would generate and there is a clear obligation on the study to relate the consequences of its proposed tunnel to the Government's target for reducing deaths and serious injuries to children.

**S5 *Alternative solutions***

- S5.1 NECTAR questions the fiscal prudence of providing such overcapacity that there is no congestion at the tunnel portals, even at peak times. Rather, variable tolls should be used to regulate demand and improve the journey time reliability for all. Avoiding the need to wait for access to the tunnel seems to be of concern to the tunnel proposers but by contrast a 10 minute interval between Metro trains, is generally deemed to be an excellent service. Clearly there is a disparity of standards here which the proposers should evaluate further.
- S5.2 NECTAR submits 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 suggests that a full evaluation of the potential of this alternative strategy should be required before the new tunnel project proceeds further.
- S5.3 NECTAR has been disappointed at the apparent failure to explore fully the public transport alternatives to the construction of the proposed new tunnel. NECTAR concludes that there is much work to be done on the contribution which bus, Metro Train and Metro Tram could make before it can be concluded that a new tunnel is needed for cars.
- S5.4 The recent report by the Commission for Integrated Transport has shown that the bus can deliver change fast, cheaply and with enormous impact but that greater political will is needed locally coupled with an incentive regime. NECTAR suggests that the potential for bus services to get people to the available jobs should now be investigated radically.

**S6 The Government's overarching objectives**

- S6.1 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. To that, add the pollution, severance, noise, and danger which are inevitable during the construction years and in perpetuity thereafter and the price is clearly too high.
- S6.2 NECTAR wishes 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 NECTAR postulates that people must take precedence.
- S6.3 The Government has set five over-arching criteria for transport, namely, *Integration, Safety, Economy, Environmental impact, Accessibility*. The envisaged approach to appraisal under each of these headings appears not to have been followed by the proposers, the environmental statement will be shown by others to be deeply flawed and the importance of community does not appear to have been recognised.
- S6.4 The proposers have made many promises of possible mitigation schemes but no firm commitments. There is no evidence that the costs involved would be met by the proposed tunnel project. The proposers appear not to have responded to the Government imperative that environmental protection involves **reducing** the impacts of transport on the environment of users and non-users.