

**Summary of  
PROOF OF EVIDENCE**

**To be presented by Doug Kemp and others**

**on behalf of**

**The North West Leeds Transport Forum (NWLTF)**

**at**

**The Public Inquiry into the**

**Leeds Trolley vehicle System Order**

## Preamble

NWLTF, representing communities and businesses in North West Leeds who wish to see transport improvement, objects to the TWAO on behalf of its constituent organisations and, more generally, of residents, local businesses and taxpayers.

NWLTF has used professional expertise to examine the impacts of the NGT proposal and the analyses which support it.

It concludes that the proposal are fundamentally flawed. They fail to meet the requirements of relevant legislation, the objectives of relevant policies and plans, and even those objectives which have been set for it. NWLTF further concludes that the analyses put forward in support the proposal are flawed and biased in favour of the NGT and that the scheme's deleterious impacts far outweigh its benefits.

NWLTF will outline its perception of the main issues facing the A660 corridor and of the factors which might explain why the TWAO is being sought before presenting evidence drawn from its Statement of Case (supplemented by relevant material coming to light following that submission). A summary of the main points now follows under seven heads:-

### 1. **Deficiencies in the analysis.** Particularly:

- 1.1. Exaggeration of bus journey times relative to those of NGT.
- 1.2. Under-estimation of the delays which NGT will cause to traffic on the A660.
- 1.3. Errors in the representation of passengers' walking routes which will have inflated the predicted shift of passengers from bus to NGT.
- 1.4. Errors in the estimation and application of the '*quality factors*' which are responsible for the predicted modal shift to NGT and for much of the benefit claimed for NGT in the appraisal.
- 1.5. Deficiencies in the specification of bus services
- 1.6. Deficiencies in modelling the demand for park and ride services.
- 1.7. Biased estimation of the impact of NGT on accessibility and connectivity.
- 1.8. Failure to give due attention to potential threats to the forecast revenue surplus.
- 1.9. Significant bias in calculation of the BCR caused by:
  - Over-estimating the extent of mode shift to NGT;
  - including (arguably inflated) perceived benefits of NGT while excluding its perceived disbenefits;
  - excluding costs to road users, local bus operators and others during the construction period;
  - overly pessimistic assumptions about conditions in the Do Minimum case;

- incomplete allowance for capital costs;
- under-estimating the mitigation costs.
- Exaggerating the punctuality benefit
- Exaggeration of annualised scheme benefits caused by over-representation of conditions experienced during University term times.

1.10. Numerous examples of errors and inconsistencies

## **2. Failure to give full, fair and adequate attention to alternative schemes.**

Particularly:

- 2.1. By allowing the analyses to exaggerate the performance of NGT relative to all the alternatives.
- 2.2. By specifying a needlessly poor Low Cost Alternative. For example:
  - using articulated vehicles (rather than modern double-deckers) thereby failing to capture the beneficial impact on other traffic or the clear passenger preference;
  - not showing improvement in bus service quality or routing;
  - not showing reduction in bus emissions;
  - not allowing increase in capacity, frequency or punctuality;
  - not seriously attempting to optimise signal settings to provide improved priority for buses while minimising delay to general traffic;
  - including only very modest improvement in bus stop quality (although such improvements are relatively cheap and are responsible for much of the benefit claimed for the NGT scheme);
  - not including dedicated non-stop shuttles for the Bodington P&R.
- 2.3. By failing to give full consideration to other low cost alternatives – many of which would require neither TWAO powers nor DfT funding.

## **3. Inconsistencies with relevant legislation, guidelines, plans and policies.**

Particularly the failure to meet the provisions of:

- 3.1. The ***Equality Act*** respecting the needs of disabled and infirm passengers.
- 3.2. The ***Road Traffic Act*** respecting road safety.
- 3.3. ***The Manual for Streets*** respecting the principles of good street design.
- 3.4. The ***National Planning Policy Framework*** respecting street design, townscape and heritage assets.
- 3.5. ‘Saved Policies’ from the ***Unitary Development Plan*** respecting conservation areas and encouragement of integration between modes.

- 3.6. The **West Yorkshire Local Transport Plan** respecting quality of life and sustainable transport.
- 3.7. The **Leeds Climate Change Strategy** respecting encouragement of walking and cycling and making best use of existing assets.
- 3.8. Relevant **Conservation Area Appraisal and Management Plans** and **Neighbourhood Design Statements**.

#### 4. **Failure to meet the aspirations, objectives and constraints set out in the**

**TWAO literature.** NWLTF will argue that:

- 4.1. Rather than **improving integration**, the NGT scheme would reduce the level of integration.
- 4.2. Rather than **enhancing the public transport service on offer** or providing a **“step change”** improvement in the provision of public transport, the overall impact is, at best, modest and, arguably, even negative.
- 4.3. Rather than achieving a **modal shift in favour of public transport**, the proposers’ own prediction is that NGT will result in a reduction in overall public transport passenger kms and an increase in total car kms, and that most of the predicted NGT patronage is simply transferred from public transport.
- 4.4. The **economic growth** objectives, which anyway depend on contested improvements in public transport and connectivity, are compromised by increased costs for local businesses, significant disruption to trade during the construction period, loss of parking spaces and damage to local ambience.
- 4.5. Rather than **improve the efficiency of city’s public transport and road networks**, the proposed scheme would result in reduced system efficiency.
- 4.6. Rather than **reduce transport’s emissions of CO2 and other GHG**, the proposed scheme would lead to an increase in total carbon emissions.
- 4.7. Rather than **promote the quality of life through a safe and healthy natural environment**, the proposals will result in:
  - increased congestion, traffic, accidents, emissions, traffic noise and time spent driving;
  - adverse impacts on the local environment, streetscape and historic heritage;
  - less convenient public transport for many users; and
  - reduced use of active modes.
- 4.8. Rather than **contributing to the quality of life by improving the access for all to jobs and services**, the scheme will result in increased door-to-door journey times for car users, less convenient public transport services for many users and threats to the viability of local businesses.

- 4.9. The scheme fails to meet many of the constraints identified in paragraph 3.101 of Document C-1. For example that:
- *there should be no unreasonable barrier to future expansion of the system;*
  - *revenues must exceed operating costs and should support scheme funding/expansion;*
  - *the Promoters should be able to deliver the identified outputs and outcomes; and*
  - *any scheme needs to provide the best value for money of all reasonable/relevant alternatives.*

4.10. That many of the objectives and principles set out in the **NGT Urban Design and Access Statement** are not met.

5. **Harm to the local economy and to the amenity of North West Leeds.**

Particularly:

- 5.1. The threats to the viability of local shops, restaurants and other community facilities.
- 5.2. Reduced accessibility caused by the reduction in frequency of public transport services from any given stop.
- 5.3. Loss of positive ambience due to the degradation of the streetscape.

6. **Inappropriateness of the proposed technology.** Particularly:

- 6.1. The difficulties inherent in any attempt to increase the capacity or extent of NGT services.
- 6.2. The risks inherent in commitment to the use of a specialist vehicle fleet of RHD trolleybuses.
- 6.3. The inability to provide express services from the park and ride sites.
- 6.4. The deleterious impact on the street scene.
- 6.5. The inappropriateness of articulated vehicles in a confined urban corridor with a high population of cyclists.
- 6.6. The fact that its need for dedicated stops reduces integration and leads to passenger frustration and inefficient use of road/kerb space.
- 6.7. The rapid pace of technological development.

7. **Likelihood of further deterioration in the attractiveness of public transport services.** Particularly:

- 7.1. The lack of guarantees concerning the provision of facilities at those bus stops which are to be moved or of bus access to the NGT lanes.
- 7.2. The negative impact on the existing bus services.

- 7.3. The likelihood that commercial considerations will lead to reductions in NGT service.
- 7.4. The possibility that a Bus Quality Contract might be used to prevent bus operators from offering fares below those offered on the Trolleybus.

8. **Deficiencies in the consultation process.** Particularly:

- 8.1. The stated objective of the Promoters' ***Communication Management Strategy***.
- 8.2. Their reliance on, and frequent quoting of, an irrelevant survey of public opinion.
- 8.3. Their failure to consult with local businesses, schools and other organisations.
- 8.4. Their failure to provide clear and consistent information at several "information events".
- 8.5. Their unwillingness to consider anything other than minor changes to scheme design.
- 8.6. Their headlining of misleading claims for NGT whose validity most people, businesses and elected representatives, will not have had the time or resources to check – and which will have reduced the level of objection to NGT and may even have engendered support for it.