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Thames Gateway bridge:
A. outline of proof of evidence, and
B. issues to cross question promoter's witnesses on.

31st May 2005

A. OUTLINE OF EVIDENCE:

Friends of the Earth evidence will refer to, but not repeat, the material raised when (as discussed) the objectors issues evidence is presented in a sequence. This issues evidence will use the work of consultants which was commissioned on behalf of the objectors (as per attached document sent on behalf of the overall objectors case / issues evidence).

The Friends of the Earth case is expected to address most if not all of the issues mentioned in the letter of 19th January 2005 from the Government Office for London as of likely relevance to the First Secretary of State. 4a, 4b, 4c, possibly 4d, probably not 4e, 4f, and maybe 4g and 4h, but is unlikely to be in that order.

The Friends of the Earth case will perhaps follow the sequence of the objector's case issues evidence, or possibly than that of our rule 6 statement.

For content of our evidence I refer as well to Friends of the Earth Rule 6 statement of case which itself refers to those issues raised in our response to the planning application, as sent to the London Boroughs of Greenwich and Newham in 2004. Friends of the Earth case will probably cover all those items (see below), but may need to include others.

Any issues not already covered but raised through the promoters Statement of case and witnesses' evidence, and anything raised through the cases and any witness evidence of the supporters, statutory bodies who object, statutory objectors, and non-statutory objectors may need to be raised. See below for areas of TfL's witnesses' proofs that Friends of the Earth are likely to want to cross question on.

Friends of the Earth respectfully state that the evidence may need to include any additional issues that come to light during preparation for the inquiry e.g. from existing or yet to be completed documents, or those raised by other parties before or during or after the first phase of the inquiry or during the second phase.

MAIN AREAS TO BE COVERED (As stated in Rule 6 statement)

1. Process problems

a. Consultation flawed, and challenge of supposed support for the scheme

b. Lack of alternative solutions to the area's needs being adequately looked at, and whether alternatives more suited to meeting the needs of the local and wider area should have been brought forward

2. Environmental Impact Assessment shortcomings

a. Crossrail sensitivity test, and not adequately considering the effects of consequent changed usage on the scheme

b. high traffic growth sensitivity test, and not adequately considering the effects of changed usage by different groups if higher tolls are required to manage traffic

c. modelling assumptions and predictions for traffic and congestion from the scheme. This is fundamental to the case as, if it is believed, TfL is underpredicting traffic then the adverse impacts would be worse than anticipated, and extra congestion would also be worse than anticipated meaning that journey times would be worse than anticipated and so social and regeneration benefits would be less than anticipated, affecting the claimed Benefit Cost Ratio.

3. Issues arising from the EIA

a. around levels of traffic generated or supposedly reduced

b. around traffic on existing crossings and perceptions of the public

c. around business interests particularly in relation to traffic, congestion and tolling

d. around the extent to which this is a local crossing, and of benefit to local people

e. around walking, cycling and public transport provision on the bridge, and effects of the scheme on these travel modes

f. around air quality and effects on health

g. around noise disturbance and effects on health and other areas of well-being

h. around accessibility benefits claimed and differences north and south, by highway and public transport, and also value of accessibility

i. around potential job creation including assumptions and issues around comparisons - those made and not made

4. Wider issues around aims and justification for the scheme, and so support for this scheme.

5. Related to all of the above will be considered where issues raised conflict with local, regional, national, European or International policy or guidelines, particularly on transport, air quality and noise issues, on tackling climate change, on social exclusion and regeneration.

6. Other areas not previously particularly responded to in relation to this scheme such as ecology and contaminated land may also be raised.

B. ISSUES ON WHICH Friends of the Earth MAY WANT TO CROSS QUESTION THE PROMOTERS WITNESSES

Friends of the Earth may want to cross question the following promoters witnesses evidence:

- Traffic, Tolling, Public Transport and Appraisal – Richard Smith
- Transport Policy – Mr H Abraham
- Town Planning – Mr MJ Adams
- Regeneration Implications of Thames Gateway bridge – Professor Bridget Rosewell
- Air Quality – Professor Duncan Laxen
- Noise and Vibration Impact – Dr M Fillery

Also possibly the following:

- Ecology – Dr JC Hughes
- Funding – Mr S D Allen
- Bridge Engineering and Cost Estimates – Mr S J Ellison
- Project Strategy and Programme – Mr MC Clarke

Friends of the Earth is unlikely to cross question the remaining witnesses' evidence.