

**Action Group Against the Bridge
St Michael's Residents' Association**

OBJECTOR NUMBER: 2052/590

THE PROPOSED THAMES GATEWAY BRIDGE

Outline Proof of Evidence

Jacqui Wise

Steve Wise

Terry Grant

31 MAY 2005

PERSONAL

My name is Jacqui Wise and I live in the London Borough of Bexley. I am married to Steve Wise and we have three children aged 12, 7 and 5.

Terry Grant lives in the London Borough of Bexley, is married and has two grown up children.

BACKGROUND

General

Jacqui Wise is to appear at the Public Inquiry as founder /co-ordinator on behalf of Action Group Against the Bridge (AGAB) and as a committee member of the St.Michael's Residents' Association (SMRA), as an objector to the Thames Gateway Bridge (TGB) scheme, to provide evidence.

Steve Wise is to appear at the Inquiry as founder/co-coordinator on behalf of Action Group Against the Bridge and as a member of the St.Michael's Residents' Association, as an objector to the TGB scheme, to provide evidence.

Terry Grant is to appear at the Inquiry as Secretary of the St. Michael's Residents' Association and as co-ordinator on behalf of Action Group Against the Bridge, as an objector to the TGB scheme, to provide evidence.

This is a combined outline proof compiled by Jacqui Wise, Steve Wise and Terry Grant.

Evidence

Each of the following subject headings will be supported by evidence from various sources. Our proof of evidence will also include reports from commissioned academics that are not yet available. Additional issues may need to be included which relate to documents requested under the Freedom of Information Act or which may arise during the course of the Inquiry.

Cross Examination

Jacqui Wise, Steve Wise and Terry Grant will wish to cross-examine including evidence submitted by TfL. Details will be submitted with our proof of evidence.

INDECENT HASTE

TfL and the Mayor of London consider it is vital to develop the TGB as quickly as possible. In their haste to achieve this however it is my view that they have neglected to adequately consult the public in the boroughs that will be most affected by this proposed scheme.

Greenwich Council also stated reasons for urgency to ensure that the planning application was approved by them before the end of year 2004.

On 14th December 2004 Terry Grant made a point of order at Greenwich Council's Planning Meeting that was hastily disregarded.

Issues, including the above, will be discussed.

REPRESENTATIONS

I will discuss the collation and recording of representations received by Greenwich Council, Newham Council, Bexley Council, the GOL, TfL and other government offices.

I will discuss discrepancies, misrepresentations, notification letters and voting at the planning control committee meetings.

LACK OF FREEDOM OF INFORMATION

A number of important requests for information under the Freedom of Information Act, considered potential evidence, have been denied or obstructed.

It is my view that this information should be in the Public Domain and if access continues to be denied or obstructed, objectors will be placed at an unfair disadvantage when submitting their proof of evidence at the public inquiry.

I will discuss the Freedom of Information Act in relation to the TGB scheme.

INADEQUATE CONSULTATION

It is my view that TfL did not adequately consult individuals and organisations on the proposals for the Thames Gateway Bridge and certain individuals and organisations who will be affected by this scheme were excluded from the consultation process and unaware of the proposals.

I will discuss TfL's Consultation in more detail including postal responses, exhibitions and road shows and in my view how information was inaccurate and misleading.

The public were not offered alternative schemes.

An Environmental Impact Assessment (EIA) was not available during the Consultation period.

TfL's consultation was neither thorough nor comprehensive. It is my view that TfL have broken the good practice guidance, which is 'to ensure Londoners are engaged and consulted effectively'.

I will discuss evidence including that put forward by Mr M C Clarke on behalf of TfL.

FLAWED MARKET RESEARCH

I will discuss my view that TfL's market research is flawed.

I will discuss evidence including that submitted by Mr M C Clarke on behalf of TfL.

INSUFFICIENT INFORMATION

It is my view that information was not readily accessible to residents in the boroughs affected by this proposed road scheme during the consultation period and since. I will discuss my view on the implications of this.

TRAFFIC MODELLING

It is my view that traffic modelling produced by TfL under-estimates the level of traffic that will be generated by this scheme. I will discuss my view on how this will impact adversely on the affected boroughs and how this may also affect commuting times and regeneration.

I will discuss my view that TfL's Traffic & Transport Report (Table 4.11) is unreliable and does not show an accurate prediction of major traffic flow changes/distribution on the road network.

It is my view that this proposed Road Bridge and its resultant traffic would conflict with government guidelines including the Mayor's Transport Strategy and The London Plan.

I will discuss evidence including that put forward by Richard Smith, Mr Kennedy and Mr Abraham on behalf of TfL, Mr Terry Wang on behalf of Bexley Council.

ROAD SAFETY ISSUES

I will discuss my view that TfL's traffic modelling is unreliable and how this may adversely affect predicted road accidents, casualties and fatalities.

I will also discuss mitigation measures and road safety.

AIR POLLUTION

I will discuss issues relating to air pollution and air quality including the following:

my view that TfL's traffic modelling is unreliable and how this may adversely affect air quality and health.

the Government's Air Quality Strategy, the Mayor's Air Quality Strategy, the Air Quality Limit Values Regulations 2003 (and the Directive), PPS23 and TfL's proposed scheme with regard to climate change and Government carbon dioxide reduction targets."

NOISE POLLUTION

I will discuss my view that TfL's traffic modelling is unreliable and how this may adversely affect noise pollution and health.

I will discuss the Mayor's Ambient Noise Strategy.

I will discuss evidence including that submitted by Dr M.Fillery on behalf of TfL on noise and vibration impact.

LIGHT POLLUTION

BRIDGE DESIGN

Due to constraints on the bridge design it is my opinion that compromises may be made to the detriment of the natural environment and people's enjoyment of the River Thames.

I will discuss evidence including that submitted by Professor R Burdett on behalf of TfL.

ECOLOGY/ADVERSE EFFECTS ON NATURAL HABITATS

I will discuss my view on how TfL's proposed scheme may adversely affect natural habitats.

I will discuss guidelines including the Mayor's Biodiversity Action Plan, Bexley's Biodiversity Action Plan and evidence including that submitted on Ecology by Dr J.C Hughes on behalf of TfL.

TRAFFIC MANAGEMENT/MITIGATION

I will discuss my view on traffic management/mitigation measures proposed by TfL.

It is my view that the detailed network model by TfL's consultant Halcrow, referred to in Mr Wang's proof of evidence on behalf of Bexley Council, should be made available to the public. If this evidence is withheld objectors will be at a disadvantage at the Inquiry.

TOLLING REGIME

Flawed precedence.

The tolling regime will be discussed including my view that tolls will not discourage non-local traffic and that there will be conflict between maximising revenue and traffic deterrence.

STRATEGIC BRIDGE NOT LOCAL BRIDGE

I will discuss my view that TfL's scheme is not a local bridge for local people.

REGENERATION/JOB CREATION/ECONOMIC BENEFITS

It is my view that the Thames Gateway Bridge is not essential to development and regeneration in the Thames Gateway area.

If higher than predicted traffic volumes use the proposed Thames Gateway Bridge, the affect will be congestion, longer commuting times and discouragement of regeneration therefore undermining the objectives that the TGB aims to achieve.

These issues will be discussed, including but not excluding others, listed below.

Benefit Cost Ratio (BCR).
Professor Whitelegg report.
Commuting/travel time assumptions.
Land contamination.
Flood Risk.
Affordable Housing.
Infrastructure.

HEALTH

There are serious concerns regarding the apparent lack of consultation between TfL and Bexley's health officials.

It is my view that health issues have been based on TfL's unreliable traffic modelling. If this is correct and the volume of traffic predicted to use the TGB increases and its distribution within the area differs from that forecast than this could have an adverse impact on health.

These and other issues will be included in discussion.

POORLY THOUGHT OUT PUBLIC TRANSPORT

I will discuss concerns over the possible demise of the Woolwich Ferry and possible shortcomings in TfL's provision of adequate Public Transport.

UNSUSTAINABILITY OF THE THAMES GATEWAY

I will discuss my view that the whole Thames Gateway development is over-ambitious, not well thought out, unsustainable and that the proposed Thames Gateway Bridge is being viewed in isolation.

CONCLUSION

Based on current available evidence it is my view that traffic modelling by TfL is unreliable and the volume of traffic predicted to use the proposed TGB is underestimated.

For these reasons I have concluded that the proposed TGB will be a significant disadvantage to existing and future communities and businesses in the affected boroughs. Contrary to TfL's beliefs the TGB will degenerate the area rather than regenerate the area.

I therefore do not recommend the proposed TGB project for planning approval.

REFERENCES

Reference will be made to documents on the list submitted with our Statement of Case. Documents will be added to this list when our proof of evidence is submitted on 16th August 2005.

I RESERVE THE RIGHT TO EXPAND UPON THE ABOVE POINTS AND ADD FURTHER POINTS TO MY PROOF OF EVIDENCE.