

Supplementary Proof of Evidence, to be delivered with the main Proof of Evidence on 25th March 2003.

On behalf of the Tyne Crossings Alliance. Delivered by Paul Winch.

1) Scope of this Supplement.

This supplement introduces Paul Winch (afterwards "me" and "I" in the following text). It brings in matters which have arisen in the conduct of the Inquiry, addresses the PTA's rebuttals which were received just before the Inquiry began, and includes some material passed to me by others connected with the Alliance and also arising from rebuttals and cross-questioning during the course of the Inquiry. In addition I include some comment on the Prospective Health Impact Assessment and two reports by the Commission for Integrated Transport (CfIT) which were published after this Inquiry began. All three of these documents are of direct relevance to the Application. We take one of these CfIT reports to be part of the subject of the Inspector's Note which was handed out on the March 7th.

2) Introduction. (This is a longer Introduction than it would be otherwise since several historic activities bear on the subject of this Inquiry).

I am Paul Winch. I came from the south of England to the North East in my 'teens to work in the shipbuilding industry and I studied and qualified at Newcastle University. After some years at a local shipyard I returned south and took up various appointments and activities including Public Relations for an employers' organisation at national level, and freelance writing. Professionally, I focussed on small craft design and building, and I ran my own company for ten years. During this time I was, in a voluntary capacity, Chairman of South East of England Inland Shipping Group, and Vice Chairman of the Group nationally. I returned to the North East in 1988 to enter into a joint venture in a local shipyard to build small craft and inculcate skills training, with the intention also of studying and testing skills culture in relation to current business mores. (Different cultural perceptions underlie some of our contributions to the Inquiry). There proved to be an irreconcilable conflict between marine employment and waterside house building which prevented that project in several guises getting off the ground.

I set up the North East Maritime Forum to promote employment on the River. I have been active in my professional Institute locally and nationally, and lectured on small craft technology and examined students at Newcastle University for several years in a Visiting Lecturer's capacity. Two years ago, with others, I set up the Tyne Crossings Alliance to challenge the New Tyne Crossing proposals. I currently act as Co-ordinator for the Alliance.

3) Rhetoric

I and others are concerned at the rhetoric behind some cross-questioning of Objectors at the Inquiry, as follows.

3a) Mr Murphy was challenged over his use of the word "only" which was added (and clearly shown to be added) by him to some PTA text in order to impart emphasis to his remarks by way of irony. This was held by Mr Sauvain to be out of order. On the other hand when Mr Murphy took text in PTA Update Issue 6: "More than 70 per cent of the traffic using the Tyne tunnel comes from and goes to destinations less than seven miles from the entrance on both sides of river" and he placed emphasis on the "and" in the sentence, Mr Sauvain contended it should be "or" and said that we shouldn't take PTA material designed for the public too literally. We maintain that it is the PTA which is out of order in both these (and in many other) cases where language used is misleading. In the example cited, if the word should be "or" (which alters the meaning altogether) the document is plainly wrong on a key statistic; if it should indeed be "and" (and I don't think we found out which) then Mr Sauvain is wrong to raise the point. This is stuff used to promote the tunnel project to the

gullible public, but Mr Murphy's reference was intended just for a select few at the public Inquiry. The scale of Mr Murphy's offence - if such it be - hardly features on the scale of misuse of language by the PTA, of which I will cite another example, next.

3b) It is surely reasonable that what is mete for the goose shall apply equally to the gander. In practice the Objectors at this Inquiry (along with the rest of the population of Tyne and Wear) have been exposed for many years to PTA promotional material in which the future tense and statements of unquestioned benefit are used for the project which is the subject of this Inquiry. We here reiterate that proposed tunnel is an "if" and not a "when", and it is most certainly not an unmitigated benefit to the region even on the proposers' own admissions. I cannot overemphasise how serious and undemocratic we consider this policy of disinformation to be. The paucity of local residents at the PTA's exhibitions and at some meetings, and at this Inquiry is because local people are persuaded that the tunnel is already (metaphorically) half built. (We have seen only one member of the public supporting the project at the Inquiry, we hasten to add, and he expressed major reservations). In this sense (I will cite another, later) local democracy hasn't started. I am glad to say that Mr Sauvain is careful not to make this semantic error, but his witnesses are less scrupulous, and, so far as we can find, all PTA promotional literature is at fault in this manner.

3c) We do not accept the principle behind Mr Sauvain's cross-questioning of Professor Elcock, contained in the words "Have you read this?...." "Have you read that....?." with the implication that if the Objector hasn't read this or that, his contribution has no validity. Many Alliance members make the point that the Professor will be familiar with a great deal of relevant information and learning not accessible to Mr Sauvain. This example applies in varying degrees, also, to other Objectors. We find that at this Inquiry the PTA attempts to set the agenda and require Objectors to "dance to its tune". We see the reason for this, and we agree that when stuff is available, ideally it should be read and understood. Some of us have done our best to do that and we hope this knowledge is evident in our responses. But we reject the notion that except regarding very particular tunnel-only issues the PTA's evidence is necessarily the last word, or even the most relevant word according to which general transport policy in the region should be guided (though of course it is relevant in that it is issued on behalf of the PTA). This point will come up again when we come to rebuttals.

3d) As I write, material has come to hand indicating that Jarrow Area Forum will make an appearance at the Inquiry, despite their non-appearance when scheduled, on the 20th. We have found that other bodies that represent local people, some of whom have strong views against the tunnel proposal, are unwilling to appear at the Inquiry due to perceived conflicts of interest. We mention this finding because in our view it means that a large number of local people have in effect been disenfranchised in this way. They do not feel able to appear themselves, and they may indeed assume that their various consultative bodies are doing it for them. We look forward to hearing Mrs Slater's Statement before the Inquiry at a later date. (Mrs Slater is Chair of Jarrow Area Forum).

3e) On a philosophical note, I have just come across an assertion in a book which touches on conversations we have had at the Inquiry, and which has, incidentally, become topical in the present international situation. Over a century-and-a-half ago, Charles Dickens in his "American Notes" wrote the words: "It would be well, there can be no doubt, for the American people as a whole, if they loved the Real less, and the Ideal somewhat more" (page 195 in my copy). I use this quotation to highlight the dilemma posed by the frequent use of the word "realistic" in the PTA's and its witnesses' evidence. The Inspector has already made this point, and I have referred to it in questions to witnesses. I wish to clarify my previous remarks however by drawing a contrast between what is "realistic" for local councils now (the Inspector's point) and what will be seen to have been realistic in (say) 15 years' time - and in subsequent years - if road traffic is allowed to grow. The matter that concerned Dickens, and caused him to write the above words, was a perceived focus in America at the time on the "feasible now" at the expense of solutions that will become unavoidable eventually, and will be very much harder and more painful to implement if they are deferred. My wife, in her Statement, illustrated this by referring to a nasty experiment in which a frog was placed in a

container of cold water which was then slowly heated. The frog was lulled into passivity, making no effort to jump out. As the water boiled, the frog cooked. My wife added, "I see a parallel in the way Man is accepting as inevitable an increase in road traffic, pollution, stress, accidents and a deteriorating quality of life. We cannot afford to wait, like the frog, until it is too late to take evasive action: we are already in hot water."

4) "*Independence*" of witnesses.

While we do not wish (or need) to impugn the integrity of PTA witnesses we point out that people employed by the PTA and their consultants - or very closely identified with them - are hardly likely to speak out against the proposed tunnel or submit evidence that strengthens the Objectors' case. So in our view it is entirely valid and relevant to say "but they would say that, wouldn't they?". This doesn't necessarily negate the value of individual PTA witnesses' arguments, but it does indicate that figures and arguments they present are by no means to be automatically regarded as relevant and "self-evidently true"; certainly they are not independent.

5) *Resources*

The disparity between the resources of the proposers of this scheme, and the Objectors, is crass. This is especially so when a very large budget has been employed to "smooth-talk" local residents for years and disseminate expensive literature which we claim is literally false as explained above. All Objectors except FOE's academic witnesses appear at this Inquiry free: if FOE's academic witnesses could charge for their entire work what the PTA pays for its advice per hour, I suspect they would be delighted. The rest of us pay our own way, and we find our own time to be here. (We also have to do a great deal of homework - and some housework? - first!).

6) *Summary of our main Proof of Evidence.*

I will read our Summary at this point. The Summary and the Main Evidence were submitted as required before the Inquiry started, and they have been disseminated to the interested parties. I will respond to the PTA's rebuttals of our evidence, later, in this Supplementary Proof.

7) *Miss Anna-Marie Allan's Proof of Evidence.*

I have been asked by Miss Anna-Marie Allan (Objector No 18) to speak to her Proof of Evidence which has received several rebuttals. I will not read her text, which is available on request, unless required to: suffice it to say that Miss Allan raises various matters including her anxieties about the effect of additional traffic on the health and quality of life of local residents. She cites Tynemouth Road in particular. Miss Allan asks me to challenge Mr Manning's rebuttal, as follows:

7a) The fact that Miss Allen lives (say) two miles from the end of the tunnel and is not adjacent to a named affected road does not mean that she cannot speak for those who are so affected, as implied in the rebuttal, or that the disturbance of which she writes will not spread more widely than claimed. Further, Miss Allan considers that events on Tynemouth and Wallsend Roads *do* impinge on her quality of life since she uses them often. Increases in traffic there are likely to worsen congestion nearer to, and even adjacent to her home.

7b) The fact that residents whose noise levels will exceed a certain limit are eligible for house insulation grants is irrelevant. Miss Allen herself visits households north of the River in the course of her work with old people. Her anxieties concern her getting to these houses safely through the extra traffic, and, additionally, she is anxious that when she takes buses she will not experience additional delays from the same cause. The noise she refers to is not inside houses but *on the pavement*. Miss Allan makes the point, further, that local residents need an acceptable quality of life outside their homes (and with open windows) as well as inside their homes with the windows closed.

Miss Allan and other Objectors wish to emphasise this latter point, since we feel Mr Manning's and other witnesses' contributions illustrate a cavalier and through-the-windscreen attitude to transport planning which is at odds with a whole raft of Government guidelines. As I mentioned early in the Inquiry, we do not impute ill will to the PTA's witnesses. We do suggest, however, that a culture has built up amongst transport planners and those in related professions which causes them to see all planning as a variation on the roads option. We also suggest that the roads option of which they are aware from their personal experience is viewed "through the windscreen of a car", which is of course only half of the story. This matter will be raised again in relation to the TAMMS report in (8e), below.

8) Rebuttals

8a) TWPTA 1 /Rationale / John Miller:

Description: "A case for the project has not been made"

Mr Miller's response relates to the TWPTA's brief, which we see as circumscribed, rather than the wider issues connected with the proposal which we raise as objections in our Evidence. We have further specific disagreements with Mr Miller's response even on this narrower remit:

- First bullet point: we submit that the scheme only "solves" problems in the entrances to the tunnels temporarily and that the knock-on effect of the scheme would be to exacerbate the problem elsewhere and make corrective measures harder, later. The scheme would not solve congestion problems "in its approaches" if these words are taken to mean Tyne Dock, Jarrow, Willington Quay, Howdon, Hebburn etc. etc.: ie not simply what are technically known as the "approach roads".
- Second bullet point: we submit that the tunnel leads to an overall reduction of safety for vehicles as set out in our (Main) Proof of Evidence p15 2.2.7. Following discussion of this point during the Inquiry we here add the specific problem of catching "young bloods" (or geriatrics for that matter) speeding in the proposed new southbound tunnel with no further barrier at which they may be apprehended. This is far less likely in the present tunnel arrangement and a resulting tailgating crash would be likely to involve a higher approach speed between the vehicles involved. A tragic event in a French tunnel which led to Princess Dianna's death a few years ago was cited as an example.
- Third bullet point: public transport can be improved in the present tunnel and/or by the construction of a new Metro extension, from South Shields to North Shields, in both cases instead of the proposed tunnel.
- I will refer to the PTA's claim of economic benefit in my response to Mr Tunnell's rebuttals.

Description: "Implication that previous tunnel not yet paid for and a question as to how the current proposals will be funded".

Mr Miller's reply sheds more light on what is planned, for which thanks. We simply add that the present tunnel casts a shadow over negotiations to fund a new one, and also clearly indicates that cross-Tyne road tunnels funded from tolls are not money-spinners on the evidence so far!

Description: "Is it PFI, PPP or neither?"

Mr Miller clarifies the issue. We point out that dissatisfaction with PFI / PPP schemes is far from confined to tunnel objectors. The local morning business paper: "The Journal", has run a long campaign against the use of PFI / PPP schemes. As raised earlier in the Inquiry the chief complaints against such schemes may centre on projects such as new hospitals rather than roads, but we mention that there is still a parallel: a complaint against hospitals funded in this way is that PFI operators shift the external costs (especially for hospitals and schools) on to the

public. We argue that the same applies to this tunnel project: the interest of the funders (to attract traffic) would be the exact opposite to the interest of the local community and the Government, which is to reduce at least inessential traffic.

Other examples would be the various urban light rail systems, Croydon, Manchester etc, which in every respect except PFI are resounding successes. We cite again the poor precedent provided by the Skye Bridge.

8b) TWPTA 2F / Richard Thurlow / Engineering matters

We wish to see the project dropped, so our comments on costs are secondary to our other arguments. In the main we are content to let our comments stand (and as added to by others during the Inquiry) and for them to be viewed alongside Mr Thurlow's rebuttals.

However we wish to comment on certain of Mr Thurlow's other points as follows:

1.6 *"There is no need for the improvement of local roads"*. Some local roads are overloaded already from the point of view of residents, and we feel that these residents are better judges, and they apply more relevant criteria, than third parties unfamiliar with the location or with arbitrary capacity measurements which don't take specific local conditions into account. The Mr Sauvain may criticise objectors for not having read every last word of the PTA's evidence, but we would equally deprecate the failure of the PTA witnesses to have fully understood the details of the situation in the communities affected by their proposal.

1.7 *"The Riverside Route and Felling Bypass provision are outside the context of this scheme"*. The tunnel would increase traffic by an amount over which we disagree, but we agree the fact. Therefore the need for extra road capacity is an impact of the tunnel proposal which will have to be addressed sooner or later, and it should be openly acknowledged and costed as such. (Or, better avoided, by restraining traffic growth and building no tunnel). The current coy dismissal of this link by Mr Thurlow is in our view incorrect.

1.12 *"The costs of disposal to land and sea are included in the Cost Estimate, and the paragraph above refers"*. This implies that no extra cost would arise if disposal to land proved necessary. Examination of the paragraph above however indicates that the final cost will be estimated by would-be concessionaires, and could be much higher than stated. This gives a different meaning to the words "...included in the Cost Estimate"!

1.15 *"Inherently, a two-way tunnel is less safe than a two-lane one-way tunnel....."*. And *"...speed in the tunnel will be regulated accordingly"*. Also 1.16. We disagree with these assertions as set out in 8a), second bullet point, above. (Increased traffic on the roads system generally as a consequence of the tunnel scheme would also lead to more accidents, elsewhere). As there have been no significant crashes in the tunnel, as brought out in evidence to this Inquiry, the concept of 'inherent safety' would appear to be superseded by the reality of experience.

1.18 *Escape routes* I am glad to see that the cost of escape routes from the existing tunnel has been included in the Cost Estimate. We point out that escape routes from the present tunnel could be provided without the construction of a second tunnel.

2.1 *Gaslight Public House* We have learned from the Inspector that, with the two concurrent Inquiries merged into one, the demolition of the Gaslight Public House would not be authorised without the go-ahead for the construction of a new tunnel. This meets my assertion that any permission, now, is premature. I would point out that other Alliance members take a different line however. They will bring their concerns to the Inquiry personally. I have a great

deal of sympathy for the line Mr Boldrini takes, and the Inspector's question during the Inquiry as to whether the Gaslight pub might be kept outside of the actual cutting line for the tunnel (as opposed to the line of deviation) is pertinent, should the tunnel work proceed.

8c) TWPTA 2A / Richard Thurlow / Engineering matters rebuttals

These rebuttals mainly follow the same lines as above, and my remarks above apply. However one item is additional:

- *Jarrow Junction: the question of congestion caused by an accident of concern to the Police representative at a consultative meeting.*

Mr Thurlow adds that this matter will be required to be resolved by the Concessionaire, and will also be the subject of an investigation by the Tunnel Design Safety Consultation Group. We feel we are entitled to ask 'What certainty is there that the Concessionaire would be able to resolve the matter?' In our view the best resolution is, of course, to drop the proposal altogether!

8d) TWPTA 3 / Malcolm Simpson / Review of Options

We do not have rebuttals of our evidence from Mr Simpson. My comments refer to Mr Simpson's main evidence.

1. We reiterate our concern raised after Mr Simpson presented his evidence that not only was the same firm instructed to undertake both the tunnel project and the TAMMS study, but we now understand that Mr Simpson was in charge of both. Since this dual function would prevent anyone holding this position, with the best will in the world, from giving impartial advice to the TAMMS team, we are doubly sceptical of the TAMMS findings.

4.2 Mr Simpson's evidence supports our apprehensions, formed from reading the Environmental Statement Non-Technical Summary, and our recollection from the time, that the studies generally called Cross Tyne Study Phase 1 were based on Newcastle and Gateshead, and were of the "predict and provide" model and pre-dated all modern road charging thinking, political, practical and technical. They therefore did not take the alternative of general traffic restraint into account.

4.3 Options considered in those studies excluded a Metro extension from South Shields to North Shields, which was claimed at the South Tyneside UDP Inquiry to be unfeasible "due to excessive gradients". This assertion was incorrect - our Main Evidence, page 9 "Alternative crossings" refers. Together with the failure to include severe traffic restraint this means that in our view Cross Tyne Transport Study Phase 1 fails to meet the Government's guidelines for the assessment of major new infrastructure projects.

5.1 We see that Cross Tyne Study Phase 2 was set up by all the riparian boroughs, and as such it was an improvement on its predecessor. We are aware that alternative traffic restraint measures, but not a Metro crossing as indicated in our comments on 4.3 above, were considered.

We note however that the "restraint" assumed applied to the centres of Newcastle and Gateshead only, whereas what the Alliance has in mind is congestion charging over a much wider area plus major planning changes, making car travel less attractive in contrast to public transport. In the longer term, planning must associate sources and destinations better via public transport when necessary (which implies a move away from specialised schools for instance), and planning must address reducing the need to travel. Thus the comparison cited in these

studies was not nearly drastic enough to show up the relative advantage of the no-tunnel option. Nevertheless we see some interesting outcomes:

5.6:

- *"Without trip redistribution and suppression of trips, the existing crossings could not accommodate the demand for cross river movement"*. We touch again on this issue in (8l) and (8m).
- *"Any restrained trips would be replaced by suppressed trips"*.

We suggest that restrained trips are only replaced by suppressed trips if you encourage that option in the model. A different up-to-date model with a larger armoury of restraint measures over a large geographical area would not have that effect. Our comments in 4.2 above refer.

- *"The decision on which crossing to choose depends on the political weightings given to different impacts"*

We suggest that the decision not to build a tunnel at all, but to adopt traffic (specifically car) restraint measures instead, likewise depends on political weightings and the option has been excluded for political - not technical - reasons. Of course political reasons for doing and not doing things can be valid, but we submit that the advice to the SofS arising from this Inquiry should clearly distinguish between what have in fact been political decisions (sometimes masquerading as technical decisions) made at the local level and are implicit in the project rationale, and genuine current political decisions which are the specific prerogative of the SofS, and not the PTA or even the Regional Assembly.

5.8, 5.9 and 5.10:

We submit that the comment *"[draconian restraint measures are] not capable of being effectively implemented"*, while understandable, is a counsel of despair and should not be the basis for an investment that we put (for reasons explained in our proof) at £200m. (Others will question whether a charge which is the same as for the Humber Bridge really is "draconian"). We repeat that what is, and isn't, capable of being implemented is a decision for the SofS, given the relevant facts. One of these facts is that every step taken in the wrong direction - towards traffic growth - makes things worse and makes the problems which will arise later even harder to solve. Clearly this comment implies that the SofS can take measures that constructively impact on local traffic levels - or that the current war might do it for him. We hope that the Inspector won't deny the SofS this option.

7. 1996 Study:

We note that this study excluded the option of traffic-restraint with or without a cross-River Metro extension option, so it is not a justification for the present scheme *per se*.

8. Tyne Tunnel Study 1999:

This study was for the Bede crossing only, and is not relevant to the question of whether a new road tunnel should be built.

9. and 10. Multimodal studies

As mentioned previously in my responses to other witnesses, our view is that TAMMS has no relevance to the decision to build a new tunnel. We maintain that since the option of high traffic restraint / no tunnel was excluded at Cross Tyne Study Phase 2 (we believe on the basis

of considerations which would not apply in 2003), it is incorrect to claim that TAMMS is a study supporting the new tunnel proposal. TAMMS must be regarded as at best neutral on this matter.

11. Project Orpheus

11.3 "It is particularly relevant to note that the short list of ten additional lines does not include a new crossing of the Tyne. It is clear that this comprehensive study of public transport in Tyne and Wear does not consider that a new fixed track public transport option across the Tyne is justified".

We submit that this claim is ridiculous concerning our suggestion of a Metro extension from South Shields to North Shields on the grounds that a) neither the PTA nor its advisors could possibly contemplate offering an alternative to a road crossing in view of their professional commitment to this option, and in view of the process of the current Inquiry, b) in view of the advanced stage of the road proposal we doubt whether any meaningful investigations have been made into the alternative rail option, c) this allegation that the option was rejected on other non-technical grounds is reinforced by the incorrect evidence given on behalf of the PTA to the South Tyneside UDP Inquiry that the gradients were excessive, and d) the option would only make sense in the context of a car-restraints-plus-public-transport model which was eliminated (we believe also for political reasons) in 1992.

The claim cited at the beginning of this section (11.3) takes me back to an issue raised at the beginning of this Supplementary Proof, namely rhetoric. We allege that this claim, taken literally (with the word "comprehensive" taken to be what the dictionary says it means), is misleading and wholly unjustified.

12.5 The irrelevance of the quote from PPG 13 that "the car will continue to have an important part to play" - in the context of supporting traffic growth - has been raised both by the Alliance and by Friends of the Earth. It is almost too trite to mention that bikes, prams, buses, lorries, trains, ships, wheelbarrows, scooters and walking all have important parts to play. No one disputes the truth of the quotation as it was intended to be used (and FOE quotes the words in their context, making this clear). What we all dispute is the primacy claimed for car use over and against other modes of travel in virtually all traffic studies, including those adduced to support the proposals for a new tunnel. (This bias is indeed built into the notion of "traffic study" since "traffic" is taken to mean road vehicle - mainly, cars - and even TAMMS is tasked with reducing - surprise surprise - road congestion on just two routes).

12.8 Safeguarding land for developments subject to a later Inquiry is standard practice in UDPs. It doesn't mean that the Inspector at that Inquiry supported the tunnel proposal.

12.9 Our understanding is that the Local Transport Plan for Tyne and Wear 2001 - 2006 took a new tunnel as a "given". Therefore the Plan cannot be cited as a justification for a tunnel.

12.10 We will address the economic claims for the tunnel proposal in our response to Mr Tunnell.

12.11 The RPG1 Inquiry was presented with the new tunnel proposal as a *fait accompli*. Alternative options were not discussed.

12.12 Our understanding is that the Draft Regional Transport Strategy studies also took the tunnel proposal as a "given". Therefore the Strategy can be cited neither as support for the tunnel nor as an argument against it.

12.13 We will refer to Unlocking our Potential [October 2001] in our comments on Mr Tunnell's Evidence.

12.14 Our comment on the absence of mention of a fixed Metro link across the River in the Nexus document "Towards 2016" is the same as our comments on 11.3 above.

13.6 Our response to the words "*Local policies follow national aims to limit road transport but all local plans include the New Tyne road crossing and even public transport authorities do not include a fixed public transport crossing in their long term strategies*" are included above in our comments on 11.3 onwards, above.

14.3 We note that the first three objectives cited by Mr Simpson are road-based. The fourth concerns economic benefits. We note there is no objective to improve the quality of life of local residents, whereas we would have thought this can, and should, be the overriding objective.

14.4 This is a another counsel of defeat. We trust that the Inspector will give the SofS the opportunity to decide what is "realistic" and what can be supported by appropriate national measures where necessary. Developments with congestion charging, which we agree have to be implemented over a large area to work, are a case in point. This view is supported by the Freight Transport Association and others. To assume that such measures will not be in place, or well on the way to being in place, by the date this tunnel is due to open is in our view itself "unrealistic". As mentioned elsewhere the assumption that traffic can be allowed to increase, let alone be encouraged to increase by a massive infrastructure like this is almost ludicrously "unrealistic". It is no less so for being a widely held (though far from universal) belief by politicians and others. We note in support of the feasibility of some traffic restraint measures the short time it has taken to develop and implement the congestion charging scheme in London - imperfect though that may be.

14.6 The claim that a fixed public transport link is "clearly not sustainable" appears not to be based on any relevant study. (By "relevant" I mean taking an entirely different traffic approach into account, with no new road tunnel built, and with congestion charging and other appropriate measures in place and then making a comparison. Cross Tyne Phase Two does not in our view meet this test).

14.7 We submit that the fixed public transport link has been ruled out after a commitment to a road tunnel was made, and therefore to imply that this decision is the result of a fair comparison is incorrect.

14.8 My personal recollection from the South Tyneside Unitary Development Plan Public Inquiry was that the option was placed *ultra vires* by the PTA on the incorrect grounds already mentioned that "the gradients would be too steep". This claim is no longer made and it was, we believe, incorrect at the time. Therefore this claim by Mr Simpson is incorrect.

16.4 and 16.7 We do not see that the GOMMMS analysis requires any additional comment to our remarks on TAMMS. What wasn't factored into the studies wasn't studied, so the conclusions were deficient in that regard. Our next paragraphs refer.

8e) TWPTA 4E / Gordon Henderson / Rebuttal on Transport

1.1 Challenge to "current growth predictions"

I submit that the TAMMS study does not impact on the decision to favour a road tunnel option because the alternatives were excluded from the options at too early a stage.

In any case the TAMMS brief was to examine impacts on two road transport hotspots: the A1 and the A19. Our view is that in view of this brief a roads-based conclusion is inevitable. Were a brief to be: "to improve the quality of life" we believe different conclusions would be come to. One or more of the options studied in comparative studies would have to be a well-worked-out, no-tunnel option, of course.

1.2 Concerns related to adequacy of investigation of alternatives

My response to these comments are given elsewhere both to Mr Simpson and in the paragraph above. However at risk of some repetition I make some further comments as follows:

Re: GOMMMs and NATA studies, I refer to these in my comments in 8d) 16.4 and 16.7 above.

The words "*The Metro link was discounted largely because of the lack of sufficiently concentrated demand*" is, as mentioned before, a counsel of despair. The function of planning authorities is to concentrate demand through correct siting of sources and destination (obviously not something they can do overnight), and by encouraging the provision of better public transport access including appropriate means for bus/Metro interchange. We submit that this has been a political decision without adequate and timely "what-if" studies which would take strong car restraint and other assumptions into account as a wholly viable alternative. The same applies to a South Shields Metro extension to North Shields: I cited the political impossibility of the team's favouring this option while also promoting a road tunnel, and I mentioned the incorrect engineering assessment made, in 8d) 11.3 above.

Mr Henderson's assertion in his second paragraph under 1.2 that the TAMMS study looked at the combined role of public transport improvements and road user charging as an alternative to road building does not tally with my information, and with discussions we have already held at this Inquiry after Mr Henderson's contribution. My understanding is that such a model was not costed. It was rejected for what would appear to us to be political reasons and not for reasons of technical merit. For instance if the tunnel were simply allowed to clog up, or be denied to private cars, or if it were operated all or part of the time with priority for non-car users, or subjected to a deliberately penal toll: then clearly traffic using it would reduce. The structure of the TAMMS remit however denies this possibility (except perhaps the penal toll) as an option, and this is just one of what we see as a whole chain of methodological faults which mysteriously all push the appearance of advantage for the tunnel proposal in one direction.

Another major objection is that the "do-nothing" option or "do minimum" option is, in our view, an invalid comparator to use in such studies.

Our comments on what is "realistic" in (3e) above, refer.

1.3 Tunnel will boost car traffic in region and will hinder freight

The claimed £20m cost savings to freight assumes reduced congestion. We claim extra traffic especially car traffic which is the main bugbear for freight operators will lead to more congestion and worse conditions for lorries. Delays at the tunnel itself are only part of the equation. We note that the Freight Transport Association favours congestion charging because rapidly increasing car traffic is the main problem the industry faces. This project would make that situation worse.

1.4 Compatibility with planning policy PPG1 and PPG13.

We do not accept the traffic reductions claimed, and we point out that the effect of the tunnel

would be to promote an increase in traffic in the long term. The two references quoted require planning authorities to reduce traffic.

1.5 Analysis does not take into account improvements needed to address local congestion

We do not accept improvements necessary "as a direct consequence of the scheme" to exclude local road schemes. We submit that pressure for local road improvements would become progressively harder to resist as a result of the tunnel if built, and it is disingenuous to seek to de-link these events. We believe the package of the proposed new tunnel and local roads improvements should be viewed as a whole, and suggest that this puts a much higher figure on the real cost of the project than the PTA claims. In our view it is not unfair to suggest that all such costs should be a charge on the tunnel promoters but we have to say we would not want this to set a precedent for PFI improvements to local roads!

1.6 Increased traffic levels would make bus movements in the vicinity of the north and south ends of the proposed new tunnel, worse.

We don't accept that the scheme would reduce congestion other than in the immediate approach roads. Clearly with a traffic increase as anticipated in future years, this cannot be so. The alternative we propose assumes traffic reduction which is the only way to address the problem constructively. Bus priority measures could be improved to give buses direct access to both ends of the present tunnel (ie: jumping all queues, which they can't do now) and tolls could be removed from buses through the present tunnel.

8f) TWPTA 5 / Nick Chism / Financial Analysis

I have commented on Mr Miller's rebuttal on the same topic in (8a) *Description: "Is it PFI, PPP or neither?"*. I don't wish to add to (or detract from) my general reservations about PFIs and PPPs already made to Mr Miller, but I am pleased to add that Mr Chism's information is helpful. He clarifies several issues.

8g) TWPTA 6 / Christopher Manning / Noise and Vibration

A list of 15 questions has already been sent to Mr Manning. Suffice it to say here that we do not accept that nuisance is confined to the insides of people's houses or that is sufficient to state that sound insulation is available if noise levels exceed a certain level.

8h) TWPTA 7E / Dr Michael Bull / Air Quality rebuttals

2.1 Dr Bull's thesis that Jarrow has no air pollution problem would (no doubt will) be contested by local residents (slightly more local to the proposed tunnel site than I am). I can't add to their comments or to what I believe has been considerable publicity for allegations that there IS an air quality problem. Certainly there is poor air quality adjacent to many roads - Mr Bull has merely to go there and sniff. He may not even have to sniff!

As mentioned elsewhere we do not accept the relevance of the "do nothing" comparator.

2.2 and 2.3 A general increase in traffic which would arise from this scheme (and not from the traffic restraint scheme we propose) must lead to an increase in pollution from vehicle exhausts for any given efficiency of combustion. We are glad to see that Dr Bull acknowledges that air quality arising from cleaner exhausts applies to all scenarios, but we do not accept that the tunnel proposal can in any way improve air quality compared with a policy of traffic restraint. The truth is very much the opposite. We suggest that congestion would arise elsewhere in the region to at least offset any improvements in the tunnel entrances. Extra

traffic emits extra fumes whether congested or running free.

2.4 The scheme cannot show a "small reduction in global emissions" if it increases traffic as it is intended to do, and if that traffic clogs up elsewhere as we allege that it must do. We think most observers agree that eventually, if there isn't traffic restraint, many of our roads (all except the proposed Tyne tunnel and the Humber Bridge?) will be clogged up by say 2020. That doesn't represent a reduction in pollution, and it is ingenuous to deny that the proposed tunnel is part of a process of increasing traffic which must necessarily have this outcome. Reductions in emissions due to cleaner exhausts can in no way be claimed "as part [in the sense of a result] of the scheme".

3.2 and 3.3 We submit that these conclusions are based on a wrong assessment of traffic growth and traffic behaviour when exposed to the ever-increasing "stress" which is inevitable in an already-restricted urban area.

8i) TWPTA 8 / Ian Lofthouse / Spoil and Waste Management

I can find no rebuttals by Mr Lofthouse, and I don't wish to add to my main Proof of Evidence on this matter.

8j) TWPTA 9 / Steve Challinor / Sediments and Water Quality

Mr Challinor's rebuttal seems to refer only to Mr Deere-Jones' Evidence. I have no points to make further to my main Proof of Evidence on this matter, and further to questions I put to Mr Challinor when he spoke at the Inquiry.

8k) TWPTA 10 / Colin Jubb / Landscape

We are not included in Mr Jubb's rebuttals, and we have no further comments to make.

8l) TWPTA 11 / Paul Fenwick / Property Issues

We have no further comments to make. The Gaslight Pub is dealt with elsewhere.

8m) TWPTA 12 / Harvey Emms / Planning Issues

I cannot find any rebuttals from Mr Emms. The only comment I wish to make further to our main Proof of Evidence is to confirm the exchange we had when Mr Emms spoke to the Inquiry: namely my assertion that it is not the function of planners to minister to the "lifestyle aspirations" of local people. (I had unlimited car ownership, unlimited car use, and parking on pavements in mind in saying this). Mr Emms was unable to come up with Government guidance that stipulates that people have a "natural right" to have their lifestyle aspirations - defined in this way - incorporated in planning policy.

8n) TWPTA 13 / Christopher Tunnell / Economic Benefit, plus Prospective Health Impact Assessment

Mr Tunnell has characterised my objections well, and responded in a capable and thorough manner, as we would expect from him. However what lies between our respective views concerning how the decision to build a tunnel should be judged is a considerable cultural gulf. We have a different perception of priorities and outcomes from proposed actions. I think I can say that all organisations in the Alliance agree closely on this issue although member organisations differ somewhat on how best to bring into effect the changes we all desire (and so probably do many of the tunnel promoters).

As I commented after his delivery at the Inquiry, Mr Tunnell's certainty that this and that "will" happen is breathtaking. I illustrate this characteristic over-confidence with paragraph 1.3 in the Summary 13S: *"Directly, construction of the new tunnel will create 2,694 person years of employment....."*. As I mentioned before, there are two serious semantic errors in this sentence. However we see the differences between us as much greater than a matter of whether the project is a "when" or an "if", and whether statistics are always 100.00% reliable. We need to look for other perplexing assertions in Mr Tunnell's delivery to find clarification of our differences.

In Mr Tunnell's three documents we find many curious assertions. Some examples follow. In his

2.3 page 4 (there is a paragraph numbering error in my copy): *".....The last major shipbuilding yard in the region closed during the 1990's....."*. But (a) the yard re-opened and is currently busy, and (b) shiprepairing continued as an important industry, and in the view of many observers the industry has great potential. Clearly, and all too evidently in view of events over the last few years, ship repairing is commercially hazardous. But so is hardware and software supply in the computer industry as has also been made clear by local events. (The run-down of the industry in the 1990's is seen by most people then employed in the industry - and others - as having been a deliberate policy by the Thatcher Government, implemented ruthlessly by the then Tyne and Wear Development Corporation. The policy was carried forward to the desperate extent of building houses on as many shipyard sites as possible, in order to prevent any shipbuilders still alive from getting their grubby unionised hands back on their livelihood. Is this a fair test of a potentially great industry? The aircraft and car industries escaped this fate and they still demand and receive large state handouts).

I was glad to hear that Mr Tunnell confirmed his support for my and others' belief that maritime industry remains important to the local and regional economy. My own CV, given in Section (2) of this document, refers to a curious twist in this long-running and painful saga.

2.6 *"Foreign Direct Investment (FDI) has been substantial enough over the past years to sustain employment levels....."* FDI has been a major feature of Tyneside maritime industry, which indicates that foreign investors have a higher regard for our maritime industry than home grown ones do. This seems to me to argue for developing many traditional aspects of river life and demography and not destroying them. One can quibble over the word "sustained", however. Mr Tunnell's implication that FDI is typical of the area and has supported the region appears to conflict with his view throughout his documents that nothing has supported employment levels, and that is why they are low. Later Mr Tunnel writes:

2.8 *".....the region is eligible for EU Objective 2 Programme funds. This classification reflects the fact that the area is undergoing structural economic change and suffers from.....an obsolete work force....."*, and

4.11 *"Investment is largely driven by actual or perceived returns and the level of risk associated with those returns through time"*. (Nevertheless this risk seems to be something foreign investors in Tyne maritime industry have found acceptable), and

1.4 of Mr Tunnell's rebuttals to ourselves: *"I regard the river as an artificial divide and to address issues of employment as "north" or "south" of the river owes more to current perception....."* We ask is Ben Nevis "artificial". Is the North Sea? Why pick on the Tyne? I perceive a Judeo-Christian imperative of "Man rules over all the Kingdoms of the Earth" here, and I find the conclusion worrying. These perceived anomalies lead to my next over-arching criticism.

In his main Evidence, 2.16 Mr Tunnell discusses the concept of "deprivation" which is then mapped in Appendix B using the DETR Index of Multiple Deprivation (IMD) 2000 according to which the region comes out badly (so it needs a new tunnel). Referring to the DETR Website we find the following qualification: *"It is worth noting that the lack of suitable crime and physical environment indicators at ward level means that neither of these forms part of the IMD. DETR acknowledges that these are serious omissions. Furthermore, the geographical access to services domain does not include any leisure services"*.

This index is therefore very income- and employment-biased. Other than through measurable ill-health - which we agree is important - the index has no element of happiness, contentment, tranquility, or beauty, or what can actually be bought in Hebburn Netto instead of Knightsbridge Harrods. The makeup of the IMD is reproduced as Appendix B to this document and it will be seen there that health and disability have a weighting of a measly 15%. Income and employment together, however get a whacking 50%. In view of this bias, isn't Mr Tunnell's analysis in this regard a bit wide of the mark?

This boils down to a cultural divide between us: What is life for? What actually makes people happy? Clearly employment is much better than unemployment, but when it comes to call centres, shelf-stacking and other modern "vocations", the benefit of a roof and pay packet is somewhat negated by the soulless nature of the job. In contrast, some ship builders and repairers worked in appalling conditions (which have improved in the industry, of course, since) but they remember their work with pride.

So there is more to employment than a roof and a pay packet, and there has to be taken into account additionally the problem that the rich get the jobs and the poor suffer the consequences - in this case increased traffic and pollution outside their front doors. This must be doubly galling when the poor suffer a reduced quality of life, and other people's cars parked on their pavements, when they haven't got a car themselves to get to a job even if it were offered. (A measure of cars per household is quite a different thing from access to a car by members of that household when they want it, of course).

Mr Tunnel's rebuttals to ourselves illustrate a more general problem of perspective:

TWPTA 13C Rebuttal 1.36 indicating that the tunnel would provide access to the airport curiously overlooks that we already have direct access to the airport door to door by Metro (so Metro must be regarded as a "non-U" way to go).

TWPTA 13C Rebuttal 1.11. In response to our plea for quality of life as opposed to crude "wealth generation", Mr Tunnel writes; *"The Regional Development Agency One North East also places a strong emphasis on raising GDP as a means of providing the income and wealth to support an improved quality of life"*. But GDP is a measure of one of the main threats to our quality of life, namely rampant commercialism. Its only virtue is that it is easily measured. The use of this measure in place of others to guide policy is frequently cited as a cause for major social problems, especially those arising from extreme social inequality, damaged and wasted resources, and destruction of the environment. The literature on this problem is vast. A raft of information on alternative indices can be gleaned from the Website of the New Economics Foundation at <www.neweconomics.org>

Prospective Health Impact Assessment: We reproduce text from 5.6 of the Assessment, namely a list of issues that are causing concern, as Appendix C.

We seek to give a high weighting to these issues, whereas Mr Tunnel by implication down-plays them. The list sets out a number of the areas on which we disagree with the PTA and where we feel that Mr Tunnell's "wealth solves everything" approach is not only flawed - it is

the engine for future disaster. The proposed tunnel is part of that growth philosophy which we reject. (To use a medical analogy which is of course not directly related to the Assessment: an exact correspondence can be shown between car growth, as a main feature of uncritical economic "growth", and the aetiology of cancer cells in Man and animals).

8o) Multi-modal studies and effective delivery: CfIT proposals

Two reports came out early this month from the Commission for Integrated Transport (CfIT). I think these are the reports referred to by the Inspector in his Inspector's Note handed out on March 7th. The first report concerns multimodal studies.

I attach some extracts from this report which relate to this tunnel Inquiry as an appendix.

I offer a commentary on these extracts here, and I quote the first paragraph in full:

1.1 In December 2002, the Secretary of State reported on progress on the Government's 10 Year Plan for transport (10YP), which aims to deliver improved outcomes associated with transport use. The report identified measures in hand but also stressed the need to do more, particularly as previous estimates had almost certainly under-estimated future congestion levels.

I cite this as in our view exemplifying increased congestion that would (typically) follow from a tunnel, if built (but can be avoided by not building it).

2.6 This paragraph begins with the words: The principal issue for CfIT is that decisions being taken now on improvements to the road network at the very least should not pre-empt possible future decisions on charging.

The paragraph goes on to refer to the policy vacuum mentioned by the Inspector on Day 3 of this Inquiry. We fully acknowledge that this uncertainty in Government policy creates problems for officers in local government.

2.7 Concerning road charging, this paragraph concludes: "The necessary political will both by Ministers but also importantly by elected members at the local level with regard to demand management and specifically road pricing[,] is the key to delivery in this area".

We cite this as confirming our contention that officers of Local Government cannot and should not just sit back and wait for central Government to give clearer signals while in the meantime denying traffic-reducing options (2.6, above, also refers).

2.11 This paragraph begins: A further challenge is the possible existence of a disconnect between the key principles underpinning the transport elements of RSS on the one hand and the MMS recommendations on the other.

We suggest that the tunnel rationale is road-based as foreseen in this CfIT Report (TAMMS is indeed a road-congestion driven methodology as the CfIT report clearly recognises) and that an incompatibility with PPG13 directives is built into the planning process as the CfIT correctly points out. We seek a shift of emphasis to PPG 13 traffic-reduction criteria when considering the Application for a new Tyne road tunnel, and we feel supported by the CfIT report in seeking this change of emphasis.

2.13 I include all of this paragraph here since it bears on this project in three ways (road improvements within a route alignment, Transport and Works Acts, and this Public Inquiry). The emerging recommendations from MMS suggest that many schemes in different modes will need to be taken through the planning process at the back end of the 10YP period (2007 onwards), posing

various challenges, given that the procedures for securing approval will vary according to the type of project. These range from the relatively straightforward (e.g. road improvements within a route alignment), to the more complex (e.g. use of the Transport & Works Act or even a Hybrid Bill, as in the case of some rail projects), to the potentially contentious (such as public inquiry for new road schemes).

2.20 The relevance of the following extract from 2.20 is obvious - the whole paragraph appears in the Appendix A and the whole document can be downloaded from the address given there: *The approach to trunk road appraisal includes guidance on calculating design traffic flows which appear not to account for the possible effect of demand management in the first 15 years of a road improvement and which assume that the cost of motoring will get cheaper.*

2.4 The following extract indicates a time-scale that in our view makes the tunnel proposal look short-sighted. Many observers see 15 years rather than 30 years as the time for widespread roads gridlock to occur unless drastic traffic reduction schemes are put in place. The tunnel in stark contrast is a traffic-inducing scheme and would itself not come into effect until (say 2009): *Guidance on Methodology for Multi-Modal Studies (GOMMMS) makes clear that it is appropriate for studies to consider the role of inter-urban and area wide charging in the context of a 30 year strategy.*

8p) CfIT Local Authority Survey

Another CfIT report came out last week (dated 10th March 2002 we think in error - this presumably should be 10th March 2003). The report gives the results of a questionnaire sent to councils concerning the involvement of third parties in decision making.

We cite the following notes from the report to support our view that the involvement of environmental interests characterised as "pressure groups" (though this can equally be said of One North East, the Chamber of Commerce etc. etc. or even the public as a whole) is generally low in authority decision-making. We suggest that consultation with parties likely to have opposing views in the crucial early stages of the tunnel project has been between very little and nil. (The involvement of two Alliance members in (seemingly separate) later stages of the studies appears to have had little or no effect on the outcome despite these bodies sending capable representatives). In this respect the Tyne and Wear councils have been no better than councils elsewhere, and possibly worse:

** On engaging pressure groups in developing strategies: 28% said there had been full participation, 49% said there had been partial participation, 12%*

consultation on final draft, 6% provision of information only and 5% no participation.

** But only 9% said that campaigns and pressure groups were a strong influence on expenditure decisions (46% said 'moderate' and 45% 'weak') This puts*

us 9th in a list of 10 influences, below political judgement, professional views, public consultation and above only the media.

** There is little support for congestion charging and road pricing (although the survey was carried out before the London scheme started). The only*

policies with less support were building more roads and priority lanes on motorways. Top were better buses and ticketing schemes.

** 84% of councils think LTP delivery of public transport is being hampered by the commercial operating environment and lack of regulation (relating to*

Buses).

The full CfIC report can be downloaded from:

<[Http://www.cfit.gov.uk/reports/la/index.htm](http://www.cfit.gov.uk/reports/la/index.htm)>

APPENDIX A

Extracts from "Multi-modal studies and effective delivery: CfIT proposals"

Commission for Integrated Transport, March 17th 2003.

1.1 In December 2002, the Secretary of State reported on progress on the Government's 10 Year Plan for transport (10YP), which aims to deliver improved outcomes associated with transport use. The report identified measures in hand but also stressed the need to do more, particularly as previous estimates had almost certainly under-estimated future congestion levels.

2.6 The principal issue for CfIT is that decisions being taken now on improvements to the road network at the very least should not pre-empt possible future decisions on charging. We are concerned that the current uncertainty over the Government's view about the merits of inter-urban road user charging after 2011 leaves an unhelpful policy vacuum within which decisions on MMS recommendations are currently being taken.

2.7 There is a general consensus that much work would need to be done to establish how far such a measure was practical and acceptable - work whose timely completion would depend on a clear and early Government commitment that, in principle, this was a desirable way forward. Equally, an early clear signal that Government did not favour inter-urban road user charging after 2011 (contrary though that would be to CfIT's current views) would at least provide a better chance for alternative proposals to be developed and implemented in good time. The necessary political will both by Ministers but also importantly by elected members at the local level with regard to demand management and specifically road pricing is the key to delivery in this area.

2.11 A further challenge is the possible existence of a disconnect between the key principles underpinning the transport elements of RSS on the one hand and the MMS recommendations on the other. This emerges from a survey of local authorities (key constituents of RPBs) undertaken by CfIT this year. The survey results suggest that RSS draw their inspiration from the emphasis on modal shift and reducing car dependency embodied in the 1998 Integrated Transport White Paper (ITWP) and relevant PPG notes, whereas the MMS recommendations derive more immediately from the need to address poor service performance on parts of the strategic road network. The two are not necessarily incompatible but have the potential to diverge.

2.13 The emerging recommendations from MMS suggest that many schemes in different modes will need to be taken through the planning process at the back end of the 10YP period (2007 onwards), posing various challenges, given that the procedures for securing approval will vary according to the type of project. These range from the relatively straightforward (e.g. road improvements within a route alignment), to the more complex (e.g. use of the Transport & Works Act or even a Hybrid Bill, as in the case of some rail projects), to the potentially contentious (such as public inquiry for new road schemes).

2.20 In the case of strategic road schemes, the key challenge is how schemes are to be developed and progressed in the context of decisions still to be taken on the possible introduction of road user charging after 2011. The approach to trunk road appraisal includes guidance on calculating design traffic flows which appear not to account for the possible effect of demand management in the first 15 years of a road improvement and which assume that the cost of motoring will get cheaper. This

seems at the very least to be in tension with the possible use of road user charging, as proposed in a number of MMS, and in principle could lead to levels of road provision which are economically sub-optimal.

2.4 The Guidance on Methodology for Multi-Modal Studies (GOMMMS) makes clear that it is appropriate for studies to consider the role of inter-urban and area wide charging in the context of a 30 year strategy. While plans are being developed for the introduction of distance-based charging for lorries from 2006, Ministers have also issued clear statements that they do not consider inter-urban charging feasible before 2011 and that where studies consider charging as a key plank in the strategy, they also need to consider a non-charging alternative assuming the necessary legislation were not in place.

The full CfIT report can be downloaded from:

<http://www.cfit.gov.uk/reports/mms/index.htm>

APPENDIX B

THIS IS DOWNLOADED FROM THE DETR WEBSITE

DETR published the Index of Multiple Deprivation 2000 (IMD) for England on 22 August 2000. This replaces, and improves significantly on, the Index of Local Deprivation 1998. The IMD uses a broader range of data sets and more up to date figures to produce a series of deprivation indices at both ward and local authority district levels. It provides a guide to the extent of various types of deprivation within areas but does not tell us to what extent individual households are subject to multiple deprivation.

Ward Level Indices

The IMD contains 6 'domains':

- *income;*
- *employment;*
- *health & disability;*
- *education, skills & training;*
- *housing;*
- *and geographical access to services.*

Each ward is given a score and rank in each domain based on its performance in respect of a range of relevant indicators. It is worth noting that the lack of suitable crime and physical environment indicators at ward level means that neither of these forms part of the IMD. DETR acknowledges that these are serious omissions. Furthermore, the geographical access to services domain does not include any leisure services.

Each ward has an overall IMD score, which is the sum of its weighted domain scores. The weights are: income 25%; employment 25%; health & disability 15%; education, skills & training 15%; housing 10%; and geographical access to services 10%.

Within a domain or in the overall IMD, wards can be compared using either scores or ranks. When comparing a ward's performance in different domains, only the ranks should be used.

The IMD package also includes ward level data on child poverty. This is represented by the % of children in each ward in families which claim means tested benefits. This is a subset of the income domain, rather than a domain in its own right.

APPENDIX C

THIS IS AN EXTRACT FROM THE PROSPECTIVE HEALTH IMPACT ASSESSMENT, SECTION 5.6 (SEE NOTE AT END OF QUOTATION)

During the HIA, we spoke to a wide range of individual stakeholders and key informants. As a result of these discussions, we were able to identify a number of issues that are causing concern. They have not been presented as negative health impacts, as we do not have evidence that they will actually occur. However, the fact that people think that they might is worthy of note. These concerns should not be ignored, but should be addressed by the TWPTA, perhaps through an information or educational initiative. They are as follows:

During construction.

- *Infestation (especially rats) due to soil disturbance.*
- *Effects of an influx of new people into the area (i.e. itinerant workers).*
- *Disruption of utilities to homes and businesses.*
- *Reduction in drinking water quality.*

During operation.

- *Will local people benefit from the inward regional investment?*
- *Will toll prices be a disincentive, especially for unemployed seeking work?*
- *Will the extra traffic simply mean that the new tunnel system will be jammed sooner rather than later? In which case, what will it have all been for?*
- *A worsening of air quality due to increased volume of traffic through the tunnel.*
- *If there is an upturn in the socio-economic status of the local deprived communities, because of the increased job opportunities, will their car ownership levels (currently much lower than average) simply increase to match the average and what will be the impact of this on road traffic levels in the area?*

NOTE TO APPENDIX C

The sentence quoted above: *"They [issues that are causing concern] have not been presented as negative health impacts, as we do not have evidence that they will actually occur"* means likewise that the team doesn't have evidence that they will not occur. The report is neutral on these issues since the tools to assess the likelihood of these events occurring were not available to the team. The author of the Assessment (Professor Sue Milner) wishes to make that clear. We argue in our various Proofs of Evidence that at least some of these negative impacts would occur if the tunnel were built, so the the health costs attributed to them apply. We likewise argue that in the main the health benefits will not occur. So on this basis the tunnel scheme comes out badly for the health impact on people in the region generally, as well as those who live immediately adjacent to the tunnel workings.

END