

THAMES CROSSING ACTION GROUP

Dear Mr Khan, Ms Rodrigues, Ms Alexander

We would like to begin by thanking you, Mr Khan, for committing London to reduce fine particulate matter (PM2.5) pollution in line with World Health Organisation (WHO) guidelines by 2030.

We hope this action is something that can be enshrined in UK law for the whole country, which we believe is being discussed as part of the Environmental Bill. As you know there are so many areas that suffer with illegally high levels of pollution, and now is the time for that to change.

Our reason for writing to you all at this time is because we wanted to bring to your attention the fact that whilst you have taken the positive step of committing London to reduce PM2.5 in line with WHO guidelines by 2030, evidence is available that the whole proposed Lower Thames Crossing would fail against these guidelines.

Professor Karen Lucas, a Professor of Transport and Social Analysis at the University of Leeds, was appointed by Highways England, as an independent advisor to the community impacts work stream for LTC, providing additional rigour and objectivity to the assessment work being undertaken.

As can be seen in this public tweet by Professor Lucas¹, if Highways England was forced to evaluate PM2.5 the whole project exceeds WHO health guidance.



As you will be aware (with the proposed LTC development boundary now reaching up to J28 of the M25) the northern part of the proposed LTC falls within the London Borough of Havering, hence our reason for writing to you today.

With the current predicted opening date of the proposed LTC of 2027/28 this would certainly go against your commitment to bring PM2.5 levels in London in line with WHO guidelines. It is also worth noting that the LTC would also not be compliant with carbon net zero targets either.

¹ <https://twitter.com/drkarenlucas/status/1150561005199646720>

We would also point out that Highways England have not taken into account or planned into the design of the LTC how traffic would migrate between the two crossings when there are incidents. The lack of adequate connections and built in bottlenecks would mean that chaos, congestion, and pollution would ensue when there are incidents.

As you will be aware when there is currently an incident at the Dartford Crossing traffic will find alternative routes anyway they can, and this usually involves heading in towards town to the Blackwall and Rotherhithe Tunnels, impacting London roads, traffic, pollution levels.

If the proposed LTC goes ahead and there was an incident at the Dartford Tunnels traffic would need to migrate via the A282/M25 to the A2 coast bound and onto the LTC. However, there is only a single lane slip road from the A2 onto the LTC (one of the built in bottlenecks) meaning this route would soon become congested and very likely gridlocked, meaning that not only roads in that area would be impacted, but traffic would also likely revert to heading into town to cross the river as they do now.

Obviously if the incident happened at the LTC heading northbound, traffic would attempt to use the Dartford Tunnels, which will still be over capacity even with LTC (a fact proven using HE's own data)², so would again soon become severely congested and traffic would behave in the same way as it does now.

In the opposite direction with an incident at the QE2 bridge, if traffic wanted to migrate to the LTC there is no direct connection from the A13 heading eastbound onto the LTC. Instead it would have to go all the way down to the Stanford-le-Hope junction, up around a traffic lighted roundabout, and then head back westbound on the A13 to the LTC slip road.

If instead traffic starts trying to come off the M25 at the LTC junction (near J29) it would be at a point where there are 5 lanes of M25 traffic, but there are only 2 lanes of LTC southbound (all the way down to past the A13)(another built in bottleneck).

If the incident were at the LTC southbound then again traffic would need to migrate to the Dartford Crossing which as stated previously would still be over capacity and likely mean more traffic choosing to head into town to use a crossing further up river as it does now.

In all of these instances roads in the area will soon become congested, meaning more pollution, and also traffic reverting to taking any route it possibly can, which would most likely involve reverting to the ways they have previously used, such as heading in towards town again, via the A13 and A2 etc, to use a London river crossing as they do now.

Of course we are aware of the argument and need for the problems we all suffer with due to the Dartford Crossing to be solved, but the proposed LTC is not it. That said we also believe that the huge changes in behaviours as a result of COVID-19 should also be taken into account before billions of pounds of taxpayers money is spent.

The current predicted cost, in case you are not aware as HE have been trying to keep it quiet is now up to £8.2bn, and that doesn't take into account the other standalone projects (including Blue Bell

² <https://www.thamescrossingactiongroup.com/lower-thames-crossing-is-not-fit-for-purpose/>

Hill improvements, the Tilbury Link Rd, a Rest and Service Area, which would all be needed due to LTC) that have been separated away from the LTC project in our opinion to try to improve the benefit cost ratio of LTC, a false economy.³

An alternative which we prefer, if a new crossing has to go ahead, would be Option A14. A long tunnel from around junction 2 on the M25 through to between J30/29. It would finally complete the M25 as a true motorway orbital, filling in the current gap of the A282, the problem that HE were originally tasked to solve. If built to modern standards there would be no need to stop traffic every 15-20 mins to escort hazardous vehicles as is currently the case at the Dartford Tunnels. This route would take all the national traffic, leaving the current crossing for local traffic. This route would be far less destructive, and also being a long tunnel would mean air could be filtered which would also result in improved air quality.

Despite the fact that in 2013 there was more support for a crossing at location A, the only route options that went to public consultation in 2016 were variants of Option C⁴, of which we have ended up with C3. The whole consultation process has been severely inadequate and flawed, which is a serious concern.

We hope that the above, in addition to the info on our website, highlights to you the fact that **ultimately the proposed Lower Thames Crossing would create a toxic triangle that exceeds WHO guidelines for PM2.5 and destroys homes, greenbelt, ancient woodland, grade 1 agricultural land, solar farms, wildlife habitats, communities and much more, all at a huge cost to British taxpayers, and their health and wellbeing, and is simply not fit for purpose.**

We would respectfully ask that you campaign not only for WHO guidelines on PM2.5 to be enshrined in UK law, but also campaign against the proposed Lower Thames Crossing since it is not fit for purpose and would fail against WHO guidelines for PM2.5.

Thank you for your time and consideration, we would welcome your comments, and hope to hear from you at your earliest convenience.

Kind regards

Laura Blake
Chair – Thames Crossing Action Group
www.thamescrossingactiongroup.com

³ <https://www.thamescrossingactiongroup.com/estimated-cost-per-mile-update/>

⁴ <https://www.thamescrossingactiongroup.com/how-the-preferred-route-was-chosen/>