

# **Evidence for the Tackling Local Air Quality Breaches Public Inquiry**

## **Introduction**

Thames Crossing Action Group (TCAG) represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £8.2bn proposed Lower Thames Crossing (LTC). More info on us and our concerns and issues with the proposed LTC can be found on our website [www.thamescrossingactiongroup.com](http://www.thamescrossingactiongroup.com).

This paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Tackling Local Air Quality Breaches Public Inquiry<sup>1</sup> on 16th June 2022. TCAG can be contacted via email – [admin@thamescrossingactiongroup.com](mailto:admin@thamescrossingactiongroup.com).

## **Reason for submitting evidence**

As a group we feel very strongly and have serious concerns about the impact the proposed Lower Thames Crossing would have on our health and well-being, especially in regard to air pollution. We note that the inquiry brief states about nitrogen dioxide (NO<sub>2</sub>), but we also have concerns about other pollutants, especially deadly PM<sub>2.5</sub> including brake dust, tyre and road wear all of which are relevant whether considering fossil fuel or electric vehicles.

It is for this reason that we felt it important that we respond to this inquiry. We hope that our comments will be helpful and our voice will be heard as a representative of many members of the public who have concerns for many different reasons about the proposed LTC and other similar projects. We need the Government to hear us, and we need to see actions to back up the talk of ensuring a sustainable healthy future for all, which cannot happen if you continue to allow hugely destructive and harmful projects like the proposed LTC to go ahead.

## **Evidence**

It is not news that research shows that up to 36,000 people in the UK die annually from causes linked to air pollution. Nor is it news that one of the main reasons for a new crossing to the east of London is because of the congestion and associated pollution issues suffered due to the Dartford Crossing.

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<sup>1</sup> <https://committees.parliament.uk/work/6744/tackling-local-air-quality-breaches/>

However, the Government's £8.2bn proposed Lower Thames Crossing will not solve these problems. National Highways own data proves this.

The Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 vehicles per day<sup>2</sup>. You would need to remove more than 25% of traffic from the current crossing to bring it back below design capacity.

Yet Thurrock Council have recently published their findings after analyzing traffic modelling data provided to them by National Highways, which concludes that the proposed LTC would take as little as 4% of traffic away from the Dartford Crossing in the am peak, and as little as 11% in the pm peak<sup>3</sup>. It is also predicted that there would be a 50% increase in cross river traffic. Induced demand like this obviously creates more pollution as well as more traffic.

Not only that but National Highways are not considering how traffic would migrate between the two crossings when there are incidents, if LTC goes ahead, and there would not be adequate connections. This would result in further chaos, congestion and pollution, when the original objective was to improve congestion and pollution.

It would not just be the proposed LTC, which would form part of the Strategic Road Network (SRN) that would bring additional air pollution concerns. National Highways' proposals include utilizing our existing local road network also.

Proposals such as the recent addition of the Orsett Cock to A1089 connection are a perfect example of this.

Also the built in bottlenecks that the proposed LTC would create. The A2 would be reduced to 2 lanes for a section in each direction.

There would be just 1 single lane from the A2 coastbound onto the LTC, which would be a nightmare when traffic is attempting to migrate from the Dartford Crossing to LTC.

The A13 would be reduced back to just 2 lanes for a section in each direction, after Thurrock Council only just finishing a road widening project costing over £130m to ensure 3 lanes in each direction between the M25 and A1014 for better traffic flow.

The M25 would be widened to 5 lanes at the point the LTC connects to it, yet the LTC southbound itself would be just 2 lanes, adding additional pressures and congestion at times when traffic needs to migrate from the QE2 bridge to the LTC. Especially when you consider there is no direct access to the LTC from the A13 eastbound, traffic would need to detour via the Stanford A1014 junction.

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<sup>2</sup> [https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/Operations%20update.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Operations%20update.pdf) – page 112

<sup>3</sup> <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

The overall prediction as a result of the proposed LTC would see more congestion and associated pollution, again stressing that National Highways are not properly taking the objectives of the scheme, or our health and wellbeing seriously.

The associated cost of impacts to healthcare would be considerable too, due to air pollution related illness. Not only to the NHS, but also to businesses when people are not well enough to work.

National Highways would also be inflicting the air pollution issues onto Local Authorities.

Yet National Highways have stated that they do not propose to monitor the extent of the levels of air pollution once the proposed LTC is operational, as they plan to remove pollution monitors once construction is complete.

Any time that we raise our serious concerns, or the topic of air pollution comes up National Highways use avoidance tactics instead claiming electric vehicles would solve the problem of air pollution. This of course is not the case since electric vehicles still emit PM2.5 from brake dust, tyre and road wear, the deadly particles being so tiny they enter our organs via our bloodstream.

We, Local Authorities, and many others have serious concerns that National Highways are not providing adequate information about many aspects of the proposed LTC, including air pollution assessment data. We are currently in a consultation whereby National Highways admit that assessment surveys are still being carried out, but that we are meant to trust and believe their guesstimates, since they cannot have evidence to back up their claims due to the fact they are yet to complete assessment surveys.

We already suffer with illegally high levels of air pollution in our region. But rather than use a project like the proposed LTC to ensure this serious issue is addressed and improved upon we are being told that if the LTC goes ahead the change in worsening of air quality would be negligible.

National Highways have opportunity to do simple things such as filter the air in the tunnel section of the proposed LTC, which of course would help improve air quality. Yet they are not. They are happy to allow the pollution to flow out into our communities.

What's more they are creating 'new parks' around the tunnel portals on both sides of the crossing. We know that ultimately this is about them wishing to dump the spoil from tunnels as close to the portals as possible, it is not about creating new community spaces for us. Who is going to want to visit and spend time in 'parks' with a constant flow of pollution putting their lives at risk?

At a time when the Department for Transport's Decarbonisation Strategy is seeking for modal shift including public transport, walking and cycling, the proposed Lower Thames Crossing is not being designed to allow a viable bus route, neither is it offering provision for cross river active travel.

There is also the aspect that the proposed LTC would destroy woodlands and habitats that naturally cleanse the air we breathe.

Not only is this important for climate change and decarbonisation, but of course also for air pollution and our health and wellbeing.

In July 2019 we learnt at Thurrock Council's LTC Task Force meeting that Highways England, as they were known at the time, had appointed Karen Lucas, a Professor of Transport and Social Analysis at the University of Leeds, as an independent advisor to the community impacts workstream for LTC, providing additional rigour and objectivity to the assessment work being undertaken. Professor Lucas also chaired the Community Impacts Public Health Advisory Group (CIPHAG).

CIPHAG was established in November 2018 comprising an independent chair, representatives from the LTC project team and senior representation from Local Authorities potentially affected by the project (invited Local Authorities by virtue of their proximity to the project and registered interest include Kent CC, Essex CC, Thurrock Council, Medway Council, Southend-on-Sea BC, Gravesham BC, Dartford BC, London Borough Havering and Brentwood BC).

Also in July 2019, Professor Lucas tweeted, "*Working on social evaluation project for Lower Thames Crossing. If Highways(Sic) England was forced to evaluate PM2.5 the whole project exceeds WHO health guidance. Sorry Thurrock! @yourthurrock @Jen\_robrien @thurrockcouncil*"<sup>4</sup>

Of course World Health Organization (WHO) guidance has been updated further since then, this was referring to WHO-10.

Government are now of course proposing WHO-10 levels be enshrined into UK law in Oct this year. This is extremely relevant to the proposed LTC. Yet when questioned on this National Highways simply say they are monitoring the government's consultation.

It should not come down to watching consultation, we are talking about people's lives, health and wellbeing here, we need actions.

Government's own 25 Year Environment Plan (25YEP)<sup>5</sup> states on the topic of air quality "*We will achieve clean air by meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030*". If it goes ahead the proposed LTC is currently estimated to open in 2030.

Far from fixing the problems of congestion and pollution at the Dartford Crossing and surrounding areas, National Highways proposal for the Government's Lower Thames Crossing project, evidence shows that both congestion and pollution would worsen.

We believe evidence shows that the Government's programme to tackle breaches of local air quality limits is not well set. Not only that but we believe it fails considerably, and that public money is being wasted terribly in regard to tackling air pollution.

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<sup>4</sup> <https://twitter.com/drkarenlucas/status/1150561005199646720>

<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

With plans like the hugely destructive and harmful £8.2bn proposed Lower Thames Crossing being progressed by Government, and National Highways (a government company) we have no reason to believe or trust that Government currently have an acceptable or safe plan to manage the ongoing risks to tackle air quality breaches. We need and deserve better.

Serious questions need to be asked about why Government are still progressing the proposed Lower Thames Crossing, when it clearly would result in a breach of air pollution levels, especially when there are other alternative options that would see taxpayers' money better spent in a way that could actually make a real difference. We all deserve the right to breathe clean air and we shouldn't have to be fighting our Government for that right, due to destructive and harmful projects such as the proposed Lower Thames Crossing that would create a toxic triangle.



**Thank you for allowing us the opportunity to present our paper to you in relation to this public inquiry. We hope you will find it of interest and helpful to all aspects on which you were seeking evidence. Please don't hesitate to contact us should you wish to discuss further.**