

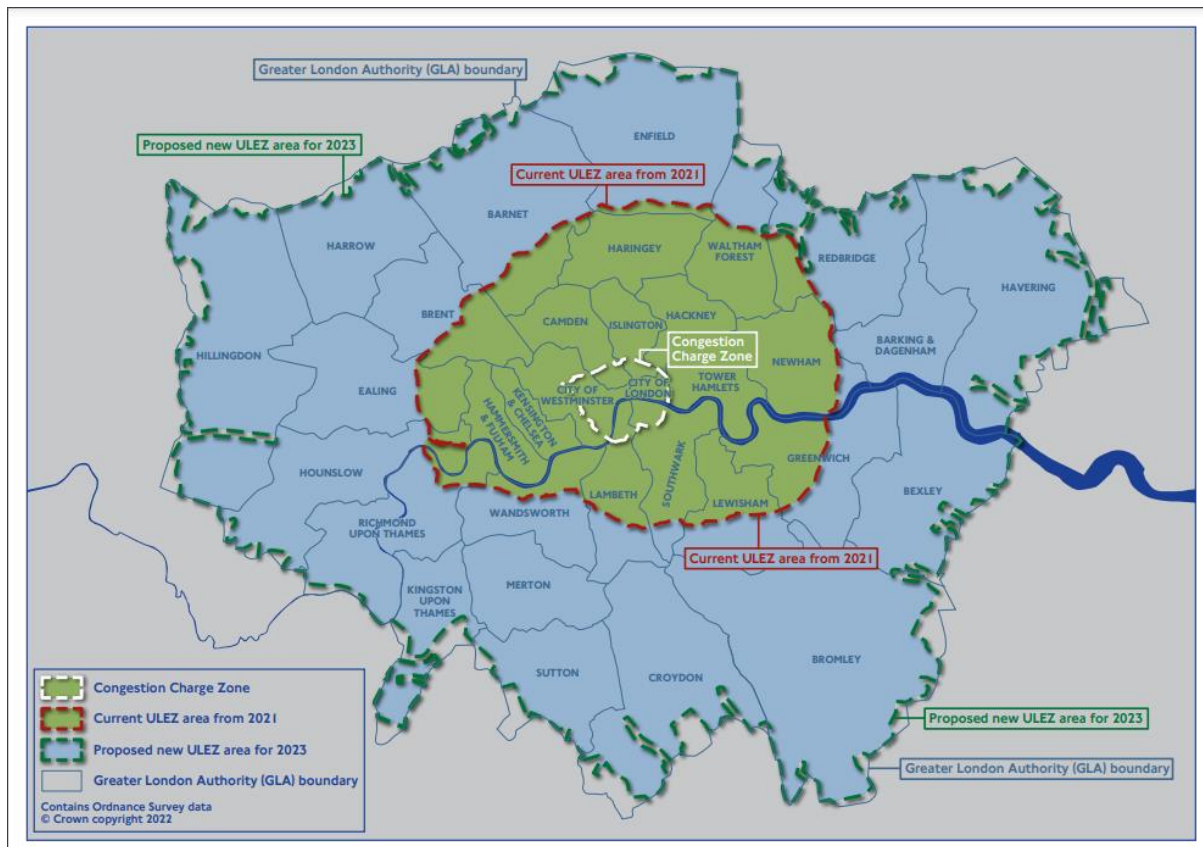
THAMES CROSSING ACTION GROUP

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ULEZ Consultation

Thames Crossing Action Group represent thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £8.2bn LTC would be hugely destructive and harmful, it would not meet the project objectives, and is not fit for purpose.

We are responding to this consultation because not only does part of the proposed LTC route fall within the London Borough of Havering, but also because other areas border the proposed ULEZ boundary. We also have very serious concerns about the dangers of air pollution, climate change (carbon emissions), and congestion.



The triple challenges

Whilst we acknowledge this consultation and proposal is purely London focused, and that the Mayor and TfL only have control over London and its roads, these challenges are of course very relevant and serious issues in all areas both in and out of London. Any side effects of the proposed ULEZ on other areas must also be taken into account.

Congestion

We definitely see a need to reduce congestion on our roads as not only does it lead to delays and resulting impacts, but also because of the associated pollution.

However, in the consultation FAQs in response to the question, *Why are you proposing to expand the ULEZ to the Low Emissions Zone (LEZ) boundary and not the Greater London Boundary?* You responded by saying that it was specifically designed to provide opportunities for vehicles to divert from travelling into London, allowing drivers of non-compliant vehicles to avoid the Zone if they do not want to pay the ULEZ charge.

We therefore have to question whether the proposed ULEZ expansion would result in more traffic avoiding ULEZ and instead impacting other roads around the proposed ULEZ boundary, and bringing us all the concerns and issues associated with such an increase in traffic.

We note the target to reduce traffic in London by 10-15% by 2041, but draw attention to the fact that more roads mean more traffic, so we call upon the Mayor and TfL to strongly oppose all new road building, including Silvertown Tunnel and the proposed Lower Thames Crossing, both of which would add to congestion rather than reduce it. We know that the proposed LTC alone would result in an increase of 50% more cross river traffic if it goes ahead, and as the route passes through a London Borough it is essential that the Mayor and TfL take this into account with future planning, and oppose the proposed LTC and do all you can to help stop it please.

Air pollution

We are very concerned about the air quality in our area, and think it is essential that steps are taken to improve air quality in all areas for everyone's benefit, health and wellbeing. Illegally high levels of air pollution are not just a London issue and concern.

We welcomed the Mayor, Sadiq Khan's 2019 commitment to reduce London's fine particulate matter PM2.5 pollution in line with World Health Organisation (WHO) guidelines by 2030.

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However, as outlined above we have concerns that the expansion plans could increase traffic around the boundary of the ULEZ, which would negatively impact other areas, including ours, and where air pollution levels are already illegally high.

Many also question whether air quality actually sees adequate improvement from the ULEZ or whether it is simply a money-making scheme.

It is not just the vehicles that are non-compliant that pollute either. PM2.5 is an issue with all vehicles due to the brake dust, tyre and road wear etc.

The Integrated Impact Assessment¹ report that forms part of the consultation materials states on page 165 (pdf page 188/197) that PM2.5 in Havering for example would be 9.2 without the proposed ULEZ expansion, and 9.2 with the proposed ULEZ expansion, no difference at all. And the NO2 for Havering would be 17.5 without the scheme and 17.2 with the scheme only a tiny difference.

We also call into question in this aspect whether your assessments take purely what you consider to be London traffic into consideration, or whether pollution from roads like the M25, and proposed Lower Thames Crossing (LTC) have also been taken into account with future air quality assessments.

It is stated in your 'Our proposals to help improve air quality, tackle the climate emergency, and reduce congestion by expanding the ULEZ London-wide and other measures' report² that in 2019 Havering was one of the London boroughs with the highest numbers of premature deaths associated with air pollution. There is reference to this possibly being due to a higher proportion of older people living in the area, but we have to again question whether it is to do with the extra pollution from roads like the M25, A127 etc.

We know that the whole proposed LTC route, which obviously includes the section in the London Borough of Havering fail on WHO-10 for PM2.5 by 2030. Please join us in opposing the proposed LTC, nobody deserves to have a huge road that evidence proves would not comply with WHO-10 by 2030. Everyone should have the right to breathe cleaner air, the pollution doesn't know whether it is in the ULEZ or not, but those making the decisions know and have a duty of care to protect as many as possible from the deadly impact of air pollution.

Climate emergency

It is very important for TfL to take steps to deal with the climate emergency.

¹ <https://haveyoursay.tfl.gov.uk/15619/widgets/44946/documents/27025>

² <https://haveyoursay.tfl.gov.uk/15619/widgets/44946/documents/27070>

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We welcome the Mayor's target to reach net zero carbon emissions by 2030.

However, we have concerns that projects like the proposed LTC go against that, and respectfully call on the Mayor to stand with us in opposition to such a hugely destructive and harmful project.

Other issues

Cost and lack of alternatives

The consultation materials state that a vehicle scrappage scheme would be available to help all eligible Londoners prepare for a London-wide ULEZ.

However, it is not just London residents who would be impacted by this, as many in areas that border onto London and the proposed ULEZ would also be impacted, and not be eligible for the suggested scrappage scheme.

Many people in areas like Thurrock work, shop, have children at schools in places like Upminster that would be impacted, but are not London residents. The financial implications of ULEZ would not only impact them, but also the businesses that would miss out because people would find alternatives outside of the ULEZ.

There are not adequate alternative options to encourage modal shift, especially in the areas that neighbor the London boroughs, where public transport options are extremely limited, especially compared to London.

Not only that public transport connections to and in London are not reliable and affordable either. We need to see a huge improvement in public transport options if we are to truly tackle the Triple Challenges.

Imagine how much more could be done with the money that is being spent and proposed to be spent on projects like Silvertown Tunnel and the proposed Lower Thames Crossing. We need to see TfL and Government spending taxpayers' money on real solutions, not projects that would increase congestion, pollution, and carbon emissions. We need and deserve better.

The proposed LTC and ULEZ

The proposed Lower Thames Crossing (LTC) route would pass through the London Borough of Havering³. Yet just like the highly polluting M25 it would be exempt from ULEZ charges, if it goes ahead.

³ <https://ltcconsultation2022.nationalhighways.co.uk/map/>

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This means that some residents would literally incur the ULEZ charge to drive off their driveway onto a quiet country lane in a rural location to maybe do a weekly grocery shop, whilst at the same time living next to roads that would have huge volumes of traffic passing by polluting the area daily that would not be liable for the ULEZ.

The whole proposed LTC route fails on WHO-10 guidelines for PM2.5⁴, it is also estimated that the carbon emissions from the project would be over 7 million tonnes⁵. It would not solve the problems at the Dartford Crossing, which would still remain over capacity⁶, in addition to a 50% increase in cross river traffic⁷.

National Highways are not considering or planning for how traffic would migrate between the two crossings when there are incidents, if the LTC goes ahead, and there would not be adequate connections. This would result in yet more chaos, congestion and pollution.

If both ULEZ expansion and the LTC went ahead more and more traffic, congestion and pollution issues would be impacted on the regions both sides of the Thames.

We call on the Mayor and TfL to strongly oppose the proposed Lower Thames Crossing, as it would fail on all your Triple Challenges, and is simply not fit for purpose. The ever rising cost, currently sitting at £8.2bn+, could be far better spent in ways to reduce congestion, pollution, and carbon emissions. We need and deserve better.

Conclusion

We need to put a stop to destructive and harmful road projects such as the proposed Lower Thames Crossing and Silvertown Tunnel, both of which would increase congestion, pollution and carbon emissions, and instead invest in real solutions that are more sustainable, reduce congestion and pollution, and ensure a planet that can sustain a healthier future for all.

We call on the Mayor and TfL to do all you can to meet the Triple Challenges, but to keep in mind that ULEZ also impacts those surrounding the proposed boundary. We need to see huge improvements in public transport to encourage modal shift, and less reliance on roads. We need the Mayor and TfL to make a stand against hugely

⁴ <https://www.thamescrossingactiongroup.com/lower-thames-crossing-pm2-5/>

⁵ <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

⁶ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

⁷ <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

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destructive and harmful road projects like the proposed Lower Thames Crossing that would just add to the Triple Challenges that Londoners and everyone else would suffer from. The £8.2bn+ from the proposed Lower Thames Crossing alone could be far better spent on real solutions.

We appreciate the Mayor and TfL only have jurisdiction over the London area. However, air pollution and carbon emissions are not limited to or restricted by ULEZ boundaries. We would ask that you do all you can to reduce congestion, pollution, and carbon emissions in a way that best improves things for everyone, and without risk of side effects to others. We all need and deserve the right to breathe cleaner air and live in a world that can sustain a safe and healthy future for us all.

Thank you for allowing us the opportunity to take part in the consultation. Should you wish to discuss any of our comments, and/or our fight against the proposed Lower Thames Crossing, please don't hesitate to visit our website and/or get in touch! Together we are stronger! Please say NO to LTC!

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