

THAMES CROSSING ACTION GROUP

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Brentwood Borough Council

Environment Strategy Consultation

Thames Crossing Action Group is a community group which represents 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 the consultation as we represent people in all areas, including Brentwood, and as a group are very concerned about climate change, air quality, and the environment.

Carbon Emissions

National Highways claims about 80% reduction are purely speculative with no evidence to back it up. This claimed reduction is based on government policy. But as a result of a recent successful legal challenge¹ the High Court has ordered the government to outline exactly how it's net zero policies will achieve emissions targets.

Latest reports actually show that the operational carbon emissions of the LTC has risen by a whopping 67%², meaning the total emissions (from both construction and operations) is now estimated to be over 7 million tonnes. Whilst we appreciate that LTC is a National Highways project and not directly a Brentwood Borough Council project, you have chosen to associate yourself with, and support, this hugely destructive and harmful project.

¹ <https://www.thamescrossingactiongroup.com/legal-challenges/>

² <https://www.thamescrossingactiongroup.com/ltc-carbon-emissions/>

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Carbon emissions know no boundaries, our environment doesn't know or care whether it is a National Highways project or a council project, the end results will be the same, and that is an environmental cost that we cannot afford to be taking at a time of climate emergency.

Air quality

We are shocked to see you detail Brentwood's air quality as being at a healthy level, since the Particulate Matter 2.5 (PM2.5) levels exceed World Health Organizations (WHO) guidelines³. PM2.5, are tiny particles that come from things like brake dust, tyre and road wear etc. They are so tiny they get into our organs via the bloodstream, and are deadly.

We are concerned that your strategy seems to focus on Electric Vehicles (EVs) as a panacea, but they emit deadly PM2.5, in some cases more than a fossil fuel vehicle due to the additional weight of EVs due to their heavy batteries.

It should also be considered that if people believe EVs are greener and cleaner they are likely to use them more, resulting in more congestion. With the incorrect and outdated thinking that congestion is solved by building more roads/lanes, this again leads to further environmental impacts. Such as the case of the proposed LTC.

New targets for air quality, including PM2.5, are to be enshrined into UK law by the end of October 2022. The whole proposed LTC route fails against the proposed targets.

Far from improving air quality throughout the region, the proposed LTC would actually make congestion and pollution worse.

Transport

We are all more than aware of the issues suffered due to the problems associated with the Dartford Crossing. The current crossing has a design capacity of 135,000

³ <https://www.blf.org.uk/taskforce/data-tracker/air-quality/pm25?>

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vehicles per day, yet regularly sees 180,000 per day. That means we would need to see a reduction of more than 25% to bring it back below design capacity.

Yet the proposed LTC would take as little as 4% of traffic away in the am peak and 11% in the pm peak. The proposed LTC would also result in a 50% increase in cross river traffic⁴.

As you can see this shows that the Dartford Crossing would still be over capacity and suffering with all the associated incidents, even if the proposed LTC goes ahead.

We have read articles about the issues and concerns about traffic in Brentwood, held by Brentwood residents and both Brentwood Borough and Essex County Councils⁵. It therefore surprises us that both Brentwood Borough and Essex County Council's seem to support the proposed LTC.

You only need consider the consequences of an incident at the QE2 bridge and traffic needing to migrate to the LTC to realise the chaos that would ensue throughout the region, including Brentwood.

National Highways are not considering or planning for how traffic would migrate between the two crossings⁶. So for instance, an incident at the QE2 bridge would initially cause traffic to come off the M25 onto the A13 eastbound. But there would be no access to the LTC from the A13 eastbound, traffic would instead have to travel all the way down to the Stanford A1014 junction, up around the roundabout (alongside DP World, London Gateway, Thames Enterprise Park etc traffic), and then back westbound on the A13 to the LTC slip road just past (but not accessible from) the Orsett Cock A128 junction.

If instead traffic attempts to come off the M25 directly onto the LTC, the M25 at this point would be 5 lanes of traffic going onto just 2 lanes southbound on the LTC (until past the A13).

⁴ <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

⁵ <https://www.msn.com/en-gb/cars/news/essex-roads-chiefs-making-brentwood-car-journeys-deliberately-unbearable-so-we-ditch-cars/ar-AA103Pkb>

⁶ <http://www.thamescrossingactiongroup.com/incidents-ltc-dartford-crossing>

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Bear in mind that when there is an incident traffic, on average, backs up another 1 mile every 90 seconds. It would not be long before traffic was back up on the M25 to junctions 29(A127) and 28(A12), both being key access points for the Brentwood area. And how long before that traffic starts cutting through by any route it can find, rat running through Brentwood to try and get to the A128 thinking it will get to the LTC (which it can't)? Think of all the associated chaos, congestion and pollution, it definitely doesn't fit with a quality Environment Strategy.

We need to see more sustainable travel options and traffic reduction as the way forward. The proposed design is not viable for public transport. There is no inclusion of rail or tram, and a lack of adequate connection to be viable for bus routes. There is no provision for cross river active travel either. Many of the 'new' paths for walkers, cyclists, horse riders are in fact existing paths that would need to be realigned to accommodate the LTC, so National Highways are then misleadingly referring to the realigned paths as 'new'.

There are alternative options that are far more sustainable. For instance, the proposed rail improvements between Ashford and Reading, for around £4bn that would take freight off the roads and onto more sustainable rail.⁷ Or Kenex Tram cross river network for around £800m that would take 10% of traffic off the Dartford Crossing, and provide a new sustainable public transport option across the river.

Water

Part of climate change is of course the erratic changes in weather patterns, resulting from one extreme to the other, with flood and drought conditions.

And it's not just a matter of whether we have too much or not enough, our water being clean and safe is of course vital for survival. Again we need to be taking into account PM2.5 levels as this pollutes not only the air we breathe but also water and soil. Growing evidence shows the increasing levels of PM2.5 in our water throughout the world.

⁷ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

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This is one of the many reasons we oppose the proposed LTC. The proposed route goes through flood plains to the extent the northern tunnel portals sit in an area that is predicted to be underwater before long as a result of climate change. And where do we expect the flood water to go if landforms are built surrounding the proposed portals? They are natural flood plains, and if the water can't flood those areas it would end up flooding other areas⁸.

The construction of the proposed LTC would also use large amounts of water, that is proposed to come from our water supply. At a time where there is genuine concern about water levels we shouldn't be wasting large amounts on a project that is simply not fit for purpose.

As mentioned there is also the aspect with a 50% increase in cross river traffic there would also be more PM2.5 polluting our water (as well as air and soil).

Not only is clean water essential for our own survival it is essential for all life and a healthy sustainable future for our planet.

Biodiversity

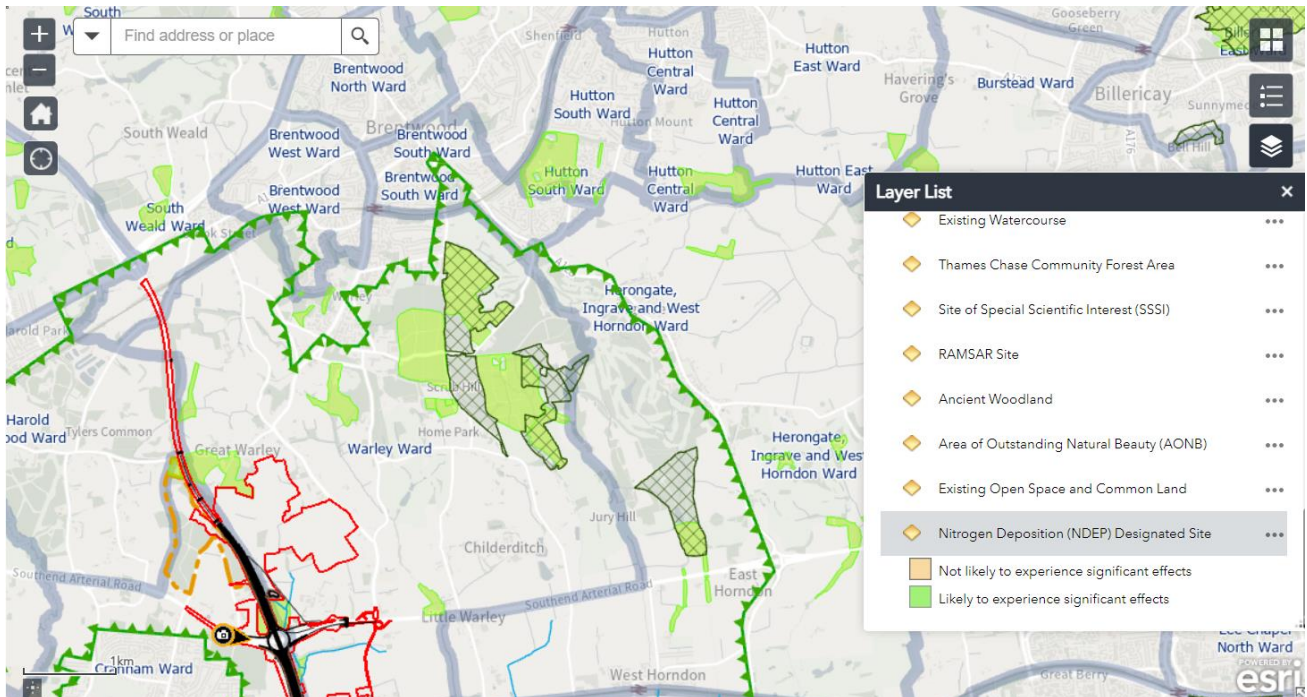
A healthy thriving natural environment is also essential for a sustainable future. The proposed LTC would be hugely destructive and harmful to the natural environment. It would destroy and negatively impact greenbelt, countryside, wildlife and habitat, woodland (including ancient woodland), and more.

The recent LTC Local Refinement Consultation covered the topic of Nitrogen Deposition which would impact many different areas, including the Brentwood area.

⁸ <https://www.thamescrossingactiongroup.com/flooding-and-the-ltc/>

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We are of course also aware of the proposed Hole Farm Community Woodland, near Great Warley, which will come before Brentwood Borough Council planning dept later this year.

We seriously question this being considered environmental mitigation or compensation for the proposed LTC, since National Highways publicly declared that they will progress Hole Farm plans regardless of whether LTC goes ahead or not. Mitigation and compensation should not be things that are being progressed regardless. We therefore consider the inclusion of Hole Farm Community Woodland within the mitigation and compensation for LTC an unacceptable form of extremely creative accounting that should not be allowed.

We also note that you state that 'Lower Thames Crossing' are one of your partners in the consultation documentation, for your tree planting strategy. This should read National Highways, not LTC, as it is a project NH are progressing regardless of LTC, as part of their plans to improve biodiversity along their major routes, in this instance the M25.

In addition, we also draw your attention to the fact that if the proposed LTC goes ahead there would be a huge loss and impact to areas people currently use for

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leisure. If Hole Farm Community Woodland goes ahead there would be a distinct lack of public transport access to the woodland, which means it would be extremely likely to see an increase in car usage to and from the woodland, as it wouldn't be accessible by other means to anyone other than the small amount of people who live in close proximity, and who already enjoy that area as it is now.

We know that Brentwood Borough Council had previously voiced concerns about the proposed LTC, and it appears to many that the show of support to LTC began around the same time as Hole Farm Community Woodland was proposed. LTC Project Director, Matt Palmer publicly stated that Hole Farm was in the wrong location for the LTC project too.

Consideration should also be given to the fact that Hole Farm Community Woodland would mean even further loss of agricultural land in our area, increasing concerns about food security.

Food security

You mention the risk of food insecurity in your consultation information, and indeed we are living at a time when food security is very much a concern for a number of reasons.

Not only is there the risk to food security due to the negative impacts of climate change directly, but also that we need to be doing all we can to reduce the carbon footprint (miles travelled) of our food too.

Projects like the proposed LTC and other developments destroy and impact many thousands of acres of agricultural land, including the most valuable grade 1 listed land. The fallout from this loss is that food has to be grown/sourced from further afield, thus increasing the impact on environment. By increasing the miles travelled it also often increases the amount of traffic (HGVs) on our roads, and again we're back to the vicious destructive circle of road/lane building, unless we instead look to more sustainable options of growing locally and when necessary using more sustainable transport options like rail.

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Cost to health

When preparing an Environmental Strategy the cost to not only the environment, but also our health should be taken into account. Climate change is already having a negative impact on people's health and well-being.

Most aspects that cause destruction and harm to our environment, also cause health and well-being impacts to our own health too. Air quality, water quality, food quality are all reliant on a healthy environment.

In turn poor health creates additional cost to the NHS, and the economy by association of people not being well enough to work.

A healthy environment, that encourages time spent outdoors in nature, and travelling actively is also beneficial to our own health. This means that we need to save and protect our natural environment, not support hugely destructive and harmful projects like the proposed LTC.

Key Performance Indicators (KPIs)

We feel that your KPIs most definitely should include targets for reducing PM2.5, targets for ensuring local food security is protected (especially sustainable farming), targets to reduce the loss of greenbelt, woodland, and natural environment.

For Brentwood Environmental Business Alliance (BEBA) to have credibility the target should be about quality of members and not quantity. Those members should be providing a genuine commitment, that is backed by evidence that their claims are possible. The inclusion of NH/LTC has led to a lowering of public perception of BEBA.

Your targets need to take into account the impacts of the proposed LTC if it goes ahead. As previously stated, the environment does not know or care whether such a hugely destructive and harmful project is a National Highways or Brentwood Borough Council project, the fall out of the environmental impacts at a time of climate emergency will remain the same.

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Conclusion

LTC is predicted to emit over 7 million tonnes of carbon which is completely unacceptable at a time of climate emergency. It would increase cross river traffic by 50%. Would not be viable for public transport and offers no provision for cross river active travel. It would not solve the problems at the Dartford Crossing, and due to poor design and lack of adequate connections would increase congestion and pollution throughout the region, and negatively impact people's health and wellbeing. It would destroy greenbelt, woodland (including ancient woodland), agricultural land (including grade 1 listed land), solar farms, wildlife and habitat, homes, businesses, communities throughout the region.

We welcome Brentwood Borough Council producing an Environment Strategy, but for it to be considered a credible strategy, that shows real concern and responsibility for the environment, the council simply cannot and should not support such a hugely destructive and harmful project as the proposed Lower Thames Crossing. Thames Crossing Action Group therefore call upon Brentwood Borough Council to please withdraw your support of LTC as part of the Environment Strategy to ensure a healthy and sustainable future for us and our environment.

This response was prepared on behalf of Thames Crossing Action Group by Chair, Laura Blake. More info on TCAG can be found on our website – www.tcaq.info and we can be contacted via email admin@thamescrossingactiongroup.com. Please do not hesitate to contact us if you wish to discuss the proposed LTC or the work of TCAG further. Many thanks.