

Response to Dartford Air Quality Action Plan Consultation

Introduction

Thames Crossing Action Group is a community group which represents thousands of people, in many areas including Dartford, 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.

Reason for responding

One of our many concerns about the proposed Lower Thames Crossing (LTC) is the fact that it would not solve the congestion and pollution problems associated with the Dartford Crossing.

We also have concerns that as well as not fixing the problem of congestion and pollution at the current crossing, the proposed LTC would also add to those problems both in the areas that are currently suffering, such as Dartford, as well as others and throughout the region.

We therefore welcome the chance to respond to your Air Quality Action Plan consultation¹.

Response

We acknowledge that the Air Quality Action Plan outlines the action that should be taken to improve air quality in Dartford Borough Council between 2022 and 2027.

The proposed LTC would not be operational until 2030 at the earliest, if it is granted permission, but to ensure air quality is improved in the Dartford area (and beyond) it is essential to consider the implications if the proposed LTC goes ahead, and what happens in the meantime too.

If Dartford Borough Council are truly committed to fixing the problem of congestion and the associated pollution suffered due to the Dartford Crossing then we urge you to reconsider your support of the proposed LTC.

¹ <https://www.dartford.gov.uk/environmental-services-1/air-quality-action-plan-consultation>

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Congestion and pollution associated with Dartford Crossing

We note that the draft Air Quality Action Plan states,

“Projects delivered through the previous action plans that have had positive impacts upon air pollution within Dartford include: Opposition to the expansion of the existing Dartford crossing and lobbying Central Government for national action on the A282. Progress towards the delivery of a Lower Thames Crossing located to the east of Gravesend, outside of Dartford Borough;”

This is something we obviously question and do not agree with, since the proposed LTC would not solve the problems at the Dartford Crossing.

The design capacity for the Dartford Crossing is 135,000 vehicles per day, yet regularly sees 180,000 vehicles per day.²

This means that we’d need to see more than 25% reduction to bring the Dartford Crossing back below capacity, and flowing again.

Yet the proposed LTC would take as little as 4% in the am peak and 11% in the pm peak hour. It would also result in around 50% increase in cross river traffic.³

This is the conclusion of Thurrock Council after they reviewed the official National Highways traffic modelling data.

Even if you choose to instead believe National Highways estimate, they say it would be a reduction of around 20-21% in the opening year dropping to 14% by 2044, without any indication at what point it would drop from 21% to 14%.

Either way the Dartford Crossing would still remain over design capacity, and suffering with congestion and associated air pollution.

Not only that there would still be high numbers of incidents, and National Highways are not considering or planning how traffic would migrate between the two crossings when there are incidents, if LTC goes ahead, and there would not be adequate connections.

For example, when there is an incident at the Dartford Tunnels and traffic needs to migrate to the LTC. Traffic already past the A2 junction on the M25 would need to find a way to turn around and get to the A2 coastbound to access the LTC. Traffic that comes off the M25 onto

² [Operations Update](#): page 112

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

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the A2 coast bound would soon discover that there was just one single lane from the A2 onto the LTC. It would not take long for yet more congestion and pollution.

Similarly, if LTC goes ahead, when there was an incident northbound on the LTC (south of the river) traffic would be cutting through by any means using all possible rat run routes to get to the Dartford Tunnels, again resulting in more chaos, congestion and pollution to the area.

Since this consultation is on air pollution in the Dartford area we won't go into full details, but rest assured there would be similar issues coming from Thurrock into Kent when there are incidents too.

Put simply, evidence shows that the proposed LTC would not solve the problems of congestion and pollution at the Dartford Crossing.

PM2.5 and EVs

Whilst we acknowledge that there is no concentration objective for PM2.5 within the Local Air Quality Management (LAQM), we welcome the council's acknowledgement that PM2.5 is deadly, and needs to be addressed urgently.

PM2.5 are particles of things like brake dust, tyre and road wear that are so tiny they get into our organs via the bloodstream.

Government have committed to ensuring new levels for air pollution, including for PM2.5 be enshrined into UK law by the end of October 2022. It is therefore essential that an Air Quality Action Plan should include guidelines for PM2.5.

We also draw your attention to the fact that the whole proposed LTC route would fail against WHO-10 guidelines for PM2.5.⁴

The new levels to be enshrined into UK law by the end of October, were proposed to be WHO-10 levels during the consultation earlier this year.

Additionally, we again highlight that the proposed LTC would not solve the problems at the Dartford Crossing including the associated air pollution.

On the topic of PM2.5, it cannot be overlooked that Electric Vehicles (EVs), and other non-fossil fuel vehicles also emit PM2.5.

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

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These vehicles should not be considered zero emission or pollution free. They are not the panacea that many like to believe.

In addition to PM2.5 emissions, which can even be higher due to the additional weight that EVs carry due to the batteries; EVs also do not solve the issue of congestion.

There is a risk that if people believe that EVs are cleaner and greener they will use them more, resulting in even more congestion.

We are still some way off of removing all fossil fuel vehicles from our roads, so congestion will also include pollution from fossil fuel vehicles, EVs and other alternatively powered vehicles.

There is also the risk that when roads become congested, all too often building more new roads is wrongly seen as the solution to solving the problems of congestion.

More roads equate to more traffic, induced demand. This is already apparent in regard to the proposed LTC, where as already stated it is estimated there would be around a 50% increase in cross river traffic if the new crossing goes ahead.

Not only that, but new roads like the proposed LTC are hugely destructive and harmful, and the loss of greenspace, trees, hedges etc all has an impact on our natural environment and it's ability to support a sustainable healthy future for us all.

Sustainable Travel

We welcome that a priority of the action plan is to *“aid behavioural shift within the population to promote more sustainable, and less polluting methods of transport, reducing pollutant concentrations and thus the risks of impacting health”*

However, that then leads us to question why the council are therefore supporting the proposed LTC, which just encourages and results in an increase in yet more road traffic.

The proposed LTC has no provision for cross river active travel. The proposed LTC would not be viable for cross river public transport, such as bus routes, due to the lack of adequate connections⁵.

⁵ <https://www.thamescrossingactiongroup.com/ltc-public-transport-and-nmu/>

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Alternatives

We would ask you to give more consideration to possible alternatives to the proposed LTC, in regard to solving the problems suffered due to the Dartford Crossing.

Rail improvements between Ashford and Reading⁶ could take large amounts of freight off the roads and onto more sustainable rail.

Is it really acceptable that a port as large as Dover not to have rail options? Why are we/they relying so heavily on road freight at a time when it is clear that we need to be moving to reducing traffic on our roads and to more sustainable transport options?

Similarly, Kenex Tram would provide a much needed cross river public transport option.

When you ask people why they use their cars to cross the river at the Dartford Crossing it is often because there is not a viable alternative. We need more investment into more sustainable, reliable, affordable, safe public transport and active travel options.

Other comments on the draft plan

National Highways

We note that reference is made to the possibility of additional support from National Highways, amongst others.

We would draw attention to the fact that National Highways have a vested interest in the proposed LTC for example, so this should be taken into consideration in regards to any involvement from them.

That said National Highways must be held accountable for the impacts that the Strategic Road Network, including the A282 (Dartford Crossing) has on people and their health and well-being.

More needs to be done to ensure the congestion and associated pollution from the Dartford Crossing, and other roads, is dealt with in an efficient and effective way.

The proposed LTC would not solve these problems, and if anything would add to the problems. We need and deserve better.

A282 (Dartford Crossing) AQMA

We note that an AQMA was declared in 2001 due to exceedances of the annual mean AQO for both NO₂ and PM₁₀ at the A282 (Dartford Crossing).

⁶ <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

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We also note that your draft states that PM10 is not currently being monitored by Dartford. We assume that since no data is shared it is highly likely that National Highways is also not monitoring PM10 at this location.

This is completely unacceptable, and must be addressed as a matter of urgency.

Not only monitored but also urgent action is needed to improve air quality in this, and other, locations urgently too.

Regardless of whether the proposed LTC goes ahead or not there are still going to be congestion and pollution issues at the Dartford Crossing and surrounding areas.

Dartford Local Plan/planning

We would respectfully draw attention to concerns that the Local Plan and planning in general does not seem to be taking the associated traffic impacts into account, particularly in the vicinity of the Dartford Crossing and nearby junctions.

Logistic parks and the like being granted permission right on top of an already way over capacity crossing seems counterintuitive.

We would ask the council to ensure moving forward that more consideration is given to planning permissions, to ensure that developments are not just adding to an already serious issue.

It should not be purely a focus on private car usage, but also on business vehicles including LGV and HGVs.

Conclusion

We welcome the fact that the council are recognising the importance of dealing with air pollution. Also, that you identify that a change in travel habits is needed, and should be encouraged.

We appreciate that the council are identifying how harmful and how urgently air pollution needs to be addressed. But we also call on you to focus more on deadly PM2.5 too.

We acknowledge that a huge amount of air pollution in the Dartford area is associated with the Dartford Crossing, a road that as part of the Strategic Road Network is the responsibility of National Highways, rather than the council.

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We therefore call upon the council to start holding National Highways more accountable for the harm the roads they are responsible for are having on people.

Measure number 21, Lower Thames Crossing, in Table 5.1 of the Air Quality Action Plan Measures (Initial Draft) needs to be improved upon.

We again call upon the council, and your air quality partners/stakeholders to review the evidence on the proposed LTC, that proves what is being proposed would not solve the problems at the Dartford Crossing, as a matter of urgency.

Air pollution associated with the Dartford Crossing is a serious issue with serious health and well-being implications for people who need and deserve better.

We would welcome the opportunity to discuss this further with the council, and we know that other neighbouring local authorities would also welcome the opportunity to discuss the concerns about the proposed LTC with you too.

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