

THAMES CROSSING ACTION GROUP

www.thamescrossingactiongroup.com

26th November 2022

Ref: TCAG-LON-221126

Dear Mr Mayor and London Assembly members

We are writing to you after learning that you have approved the Ultra Low Emissions Zone (ULEZ) expansion, and particularly in regard to the proposed £10bn+ Lower Thames Crossing (LTC) road project.

The original task of a new crossing between Kent and Thurrock/Essex was to fix the problems at the Dartford Crossing, namely congestion and pollution.

The proposed route runs between the A2/M2 in Kent near Shorne, tunnels under the River Thames, through the borough of Thurrock, and into the London Borough of Havering, and also Essex.

We have serious concerns about air pollution, and the areas this proposed route would pass already suffer with illegally high levels of air pollution. Not to mention the fact the proposed LTC would not solve the congestion and pollution issues at the Dartford Crossing, so there is no sign of things improving.

We acknowledge that you have committed London to reducing PM2.5 in line with World Health Organization (WHO) guidelines by 2030. We understand that your plans to expanded the ULEZ are in regard to reducing emissions and cleaning up air quality for as many as possible.

However, we wanted to contact you to ensure you are aware of the following.

ULEZ expansion would cover the London Borough of Havering, including North Ockendon, which has the existing M25 and the proposed LTC running alongside it. Evidence shows that the whole proposed LTC route would fail against WHO guidelines, and the soon to be enshrined into UK law air pollution targets for PM2.5.

North Ockendon is an example of how people living there would be subject to ULEZ, even if just to use their car for a once a week grocery shop at the nearest shops, as public transport is very limited in this more rural area of London.

Yet they would have to live with hundreds of thousands of polluting vehicles per day passing their homes, completely exempt of the ULEZ charges because ULEZ cannot include the M25, and LTC (if it goes ahead) since they are not Transport for London (TfL) roads.

When we wrote to you in 2020¹, we were told that TfL had asked National Highways (NH) why they deem an assessment of PM2.5 for the LTC unnecessary. We would be interested to know what response, if any, TfL received from NH please.

We would also ask what the Mayor, London Assembly, and TfL's position is in regard to the proposed LTC?

We understand that the proposed LTC is only partially within London, but the impacts of the LTC if it goes ahead would be hugely destructive and harmful. We all deserve the right to breathe clean air. We need and deserve better.

We have included some of the facts, our concerns, and the evidence to back things up below for your ease of reference. However, there is plenty more info available on our website, and of course we are always more than happy to discuss further, and/or answer any questions.

Thank you for your time, we look forward to hearing from you soon.

Kind regards

Laura Blake

Chair – Thames Crossing Action Group

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Proposed LTC route - <https://www.thamescrossingactiongroup.com/lower-thames-crossing-maps/>

¹ <https://www.thamescrossingactiongroup.com/tcag-letter-to-the-mayor-of-london/>

Lower Thames Crossing

Not fit for purpose

The Dartford Crossing has a design capacity of 135,000 vehicles per day, yet regularly sees 180,000 per day. That means we'd need to see a reduction of more than 25% to bring it back below capacity.

Yet the proposed LTC would take as little as 4% in the a.m. peak, and 11% in the p.m. peak hour. If the LTC goes ahead we'd also see around 50% increase in cross river traffic².

Clearly this would not solve the problems at the Dartford Crossing³.

Incidents – further chaos, congestion, pollution

The current crossing sees more than 3000 incidents per year, and since it would still remain over capacity the high number of incidents is also likely to remain.

However, National Highways are not considering or planning how traffic would migrate between the two crossings when there are incidents, if the LTC goes ahead, and there would not be adequate connections.

An example would be when there is an incident at the Dartford Tunnels, traffic would come off the M25 onto the A2 coast bound to access the LTC, only to find there would be just 1 single lane from the A2 onto the LTC.

And it would be no better when there is an incident at the QE2 bridge, traffic would come off the M25 onto the A13 eastbound to access the LTC, only to find there is no direct access and instead it would have to detour to the Stanford A1014 junction, go up and around an already busy traffic lighted roundabout (used by Thames Freeport/DP World/London Gateway etc), back down onto the A13 westbound until the LTC slip road which would be just past (but not accessible) from the A128 Orsett junction.

If alternatively, the traffic came off the M25 directly onto the LTC, the M25 at this point would be 5 lanes of traffic going onto just 2 lanes on the LTC southbound until just past the A13. The M25/LTC junction falls within the London Borough of Havering.

The results would be more chaos, congestion and pollution.

Cost – false economy

We are told that the proposed new crossing would bring economic growth and benefit. Yet National Highways refuse to publicly share a figure for the estimated growth/benefit.

If the proposed LTC goes ahead it will also lead to additional costs, of many millions of pounds. The Port of Dover have publicly stated that the A2 near Dover would need dualling as a direct result of LTC. The Port of Tilbury stated publicly that they only supported the proposed LTC route if it included a direct link road.

² <https://lowerthamescrossingthurrock.co.uk/wider-debate-is-needed-on-the-merits-of-ltc-creating-a-new-m25-outer-orbital-route>

³ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

The Tilbury Link Road was added into the design, but once support had been gained it has been removed and is being progressed as a stand-alone project. Again, this would be needed as a direct result of LTC, since you cannot have a link road without the LTC to link it to.

At the route options stage National Highways ruled out the C Variant option, which included improvements between the M20 and M2/A2 via Blue Bell Hill. Yet now Blue Bell Hill (A229) improvements are also being progressed as a separate stand-alone project needed as a result of the proposed LTC.

National Highways are also utilizing the existing local road network to enable the LTC to work, which will also result in additional cost.

The cost of the proposed LTC has now risen to £9-10bn+ and is predicted to rise further. At a cost of around £629-699million per mile, the proposed LTC would also be more expensive per mile than the highly controversial HS2⁴.

At a time when Government are looking for ways to cut spending, it makes no sense to be pushing ahead with a hugely destructive and harmful road project that is not fit for purpose.

Environment/Climate

It is not just the financial cost, there is also the cost to the environment, health and well-being, food security, and so much more.

In a time of climate emergency, the proposed LTC would emit around 6.6 million tonnes of carbon⁵. This is not compatible with legal commitments to Carbon Net Zero. The Climate Change Committee (CCC) had advised that "*New roads should only be built if they can be shown not to increase emissions.*" On that basis the proposed LTC should definitely be halted immediately.

Our country is one of the most nature depleted countries in the world. We are meant to be saving, protecting, and rewilding. Yet the proposed LTC would destroy and impact vast amounts of greenbelt, countryside, habitat and wildlife⁶. It would destroy and impact woodlands, including irreplaceable ancient woodland.

Food Security

At a time when food security is a serious concern, the proposed LTC would destroy thousands of acres of agricultural land, including grade 1 listed land⁷, some of which is within the London Borough of Havering. The loss of so much land would not only reduce food growing, but also increase food miles travelled since the lost crops would have to be brought in from further afield.

Health and well-being

It would destroy homes, lives, communities, health and well-being. The proposed LTC would fail against the new PM2.5 targets that are to be enshrined into UK law by the end of this month⁸. Electric and other non-fossil fuel vehicles are not the panacea that many like to believe. They still emit PM2.5. Tiny deadly particles from things like brake dust, tyre and road wear, so tiny they get

⁴ <https://www.thamescrossingactiongroup.com/cost-of-the-proposed-ltc/>

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

⁶ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-wildlife/>

⁷ <https://www.thamescrossingactiongroup.com/ltc-impacts-on-farming/>

⁸ <https://www.thamescrossingactiongroup.com/lower-thames-crossing-pm2-5/>

into our organs via the bloodstream. We are already suffering with illegally high levels of air pollution, we need to see improvements, not a worsening. We all deserve the right to breathe clean air.

Of course, there are also associated financial costs for the NHS with the health and well-being impacts too.

Safety/Smart motorway standards

National Highways own data had detailed that there are forecast to be 2,147 additional accidents over 60 years, including 26 fatalities, 220 serious injuries and 3,122 slight injuries if the LTC goes ahead⁹.

Whilst the proposed LTC is considered an All-Purpose Trunk Road, it is being designed to 'Smart' motorway standards. This means that the only difference between the proposed LTC and a 'Smart' motorway is the colour of the road signs.

Since Government have paused all new 'Smart' motorways whilst 5 years of safety data is collected and analysed, we feel that the proposed LTC should also be at least paused, since it would be a 'Smart' motorway by stealth.

Alternatives

As has already been touched upon, the consultation process for the proposed LTC has been inadequate right back to the route options stage¹⁰.

In the 2016 consultation Government had asked National Highways to consult on route options at Locations A and C, yet NH instead presented a biased consultation for options at Location C.

They did not include route options at Location A, which included Option A14¹¹, a long tunnel from around junction 2 on the M25 (the A2) to between junctions 30/29 (the A13/A127) on the M25.

Proper consideration has also not been given to more sustainable alternatives, such as £4bn rail improvements between Ashford and Reading that would negate the need for the LTC, by taking large amounts of freight off the road and onto more sustainable rail.¹²

Kenex Trams would cost around £800 million and offer a sustainable cross river public transport alternative.

The proposed LTC does not include provision for cross river active travel, and would not be viable for public transport/buses due to the lack of adequate connections.

Project Objectives

- To relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free flowing, north-south capacity
- To improve resilience of the Thames Crossings and the major road network
- To improve safety

⁹ <https://www.thamescrossingactiongroup.com/serious-concerns-over-ltc-road-safety/>

¹⁰ <https://www.thamescrossingactiongroup.com/ltc-route-options/>

¹¹ <https://www.thamescrossingactiongroup.com/alternative-route-option-a14/>

¹² <https://www.thamescrossingactiongroup.com/rail-and-tram-alternatives/>

- To support sustainable local development and regional economic growth in the medium to long term
- To be affordable to Government and users
- To achieve value for money
- To minimise adverse impacts on health and the environment

As you can see from the info shared, which only highlights the many concerns we have, evidence shows that the proposed LTC would not meet the project objectives¹³.

¹³ <https://www.thamescrossingactiongroup.com/ltc-project-objectives/>