

Consultation on the draft revised Air Quality Strategy

Introduction

Thames Crossing Action Group (TCAG) represent thousands of people who are opposed to the hugely destructive and harmful, not fit for purpose £10bn+++ 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.

This paper was prepared and submitted by Laura Blake, Chair of TCAG on behalf of the group in response to the Defra Consultation on the draft revised Air Quality Strategy¹ in April 2023. As Thames Crossing Action Group represents those opposed to the proposed LTC our consultation response will be in that regard. Our response is not confidential. TCAG can be contacted via email – admin@thamescrossingactiongroup.com.

Reason for responding

The proposed LTC would fail against newly set targets for PM2.5, there are also concerns about nitrogen deposition etc, and we believe that the induced demand and poor design of the proposed LTC, if it goes ahead, would result in a worsening of air quality.

With host authorities voicing concerns about the impacts of the proposed LTC, including concerns about air quality and impacts to the existing road network including local roads, we believe this consultation to be very relevant to our position in regard to the proposed LTC.

Plus, there is the aspect that the proposed LTC is a National Highways project, and they too now have a duty to the Air Quality Strategy. Based on our experience to date we have very little confidence that National Highways will take this responsibility seriously, as what they are proposing with the LTC is not in keeping with improving air quality.

We hope our response is helpful.

Response

To what extent do you agree or disagree with our commitment to better align air quality reporting zones with local government boundaries?

It is very hard to identify from the information provided, as far as we can see, exactly what changes are being made in regard to air quality reporting zones with local government boundaries. It is unclear if this

¹ <https://consult.defra.gov.uk/air-quality-strategy-review-team/consultation-on-the-draft-revised-air-quality-strategy/>

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means they would be aligned with the local authority or possibly the MP constituency boundaries, and this is obviously not the same, and could add to the layers of communications when air quality is being reported and discussed.

We agree with local authorities being given clear boundaries that allow them to report and act with the least issue possible, since air quality is such a serious issue.

However, we do have concerns that whilst local authorities and partners, such as National Highways, have their duties and responsibilities, there could be questions over the source of the air pollution and then who is responsible.

For example, a borough that has major roads, managed and maintained by National Highways could suffer with air pollution because of the roads, but with PM2.5 travelling long distances who is to say who needs to take the action, it could be local, could be from major roads, or could even be from further afield since PM2.5 can travel thousands of miles.

We have concerns that not enough importance is being placed on the dangers of PM2.5.

All too often we see mention of zero emission vehicles, which is completely misleading and inaccurate, since non-fossil fuel vehicles still emit PM2.5, sometimes much greater amounts due to the extra weight of vehicle batteries etc.

The problem is that air pollution knows no boundaries, so it is essential that everyone takes responsibility, and that local authorities don't end up with the pressures, work and costs of cleaning up air pollution that is being inflicted within their jurisdiction area, by others.

We also have concerns that National Highways and other partners may not take their responsibility seriously, and try to pass it off to the local authorities to deal with.

We also have concerns about the lack of power local authorities have in regard to Nationally Significant Infrastructure Projects within the area for which they are responsible.

For example, host local authorities have concerns about induced demand (increase in traffic) from the proposed Lower Thames Crossing, if it goes ahead, as well as the impacts of additional traffic on the existing roads, including the local road network.

When we have questioned National Highways/LTC about air pollution concerns in regard to the proposed Lower Thames Crossing they have previously told us that air pollution disperses within 200m of the road. The reality is that PM2.5 can travel thousands of miles.

As yet National Highways have been unable to share with us, details of PM2.5 in regard to the proposed LTC and the newly set legal targets within the Environment Act. Professor Karen Lucas has previously expressed concern that the whole proposed LTC route would fail against these levels.

As PM2.5 can travel further afield both locally from a major road like the proposed LTC, and also from other sources, and air pollution knows no boundary, it is (as already mentioned) a serious concern that

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partners such as National Highways may not ensure an adequate duty of care, as seen by the pushing ahead with the proposed LTC which would increase traffic and associated air pollution, at a time when as a country we are supposed to be reducing PM2.5 and improving air quality.

What more could local authorities do within the existing regulatory framework to reduce pollution from inappropriate domestic burning?

No comment as not relevant to our position as a group

How do you feel local authorities can most effectively reduce pollution from industrial sources they are responsible for?

No comment as not relevant to our position as a group

How do you feel local authorities can most effectively reduce pollution from transport and non-road mobile machinery (NRMM)?

It would help if the opinion of local host authorities and communities was given more consideration and weight with Nationally Significant Infrastructure Projects (NSIPs) that would negatively impact air quality.

The proposed Lower Thames Crossing being a prime example of a road project that fails to meet scheme objectives, and worsening air quality.

It would fail against the newly set legal targets for air pollution like PM2.5, and is also questionable in regard to nitrogen deposition.

NSIPs should not be considered exempt from compliance with the Air Quality Strategy.

As well as generally working closely with ports and airports to reduce air quality impacts, it should also be the case that such businesses are not the reason for more harmful polluting road projects. The proposed LTC is largely being progressed to serve the ports in the South East, like the Port of Dover.

Again, we have serious concerns that NSIPs get progressed in the name of 'economic growth and benefit' for which there is often no real evidence that such claims are met. At the same time there is strong evidence that new roads result in around 50% increase in traffic and thus worsen the air quality.

The Port of Dover relies purely on road, as there is no rail connection, which is crazy in times of climate emergency. Rail improvements such as between Ashford and Reading would negate the need for the proposed LTC, and offer a more sustainable, more affordable alternative.

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In regard to nitrogen deposition, there are again serious concerns of the impacts if the proposed LTC goes ahead. Again, local authorities are ridden over by NSIPs, regardless of the impacts and inflictions of such projects, like with the proposed LTC. This is not good enough.

The proposed LTC is also estimated to emit 6.6 million tonnes of carbon emissions, if it goes ahead, and would be hugely destructive and harmful.

It cannot simply be that all responsibility is put on local authorities, with government pushing ahead progressing NSIPs that impact the air quality for so many, all done because the project is a so called NSIP. More importance and weight needs to be given to health and well being and environmental impacts over what government currently gauge and rate NSIP, which is all about economic growth and benefits. Again, there is little evidence that these benefits are ever realised. Yet there is plenty of evidence that induced demand from such road projects is harmful and very real. The associated cost from health care in regard to air pollution is also very real and considerable, and again more importance should be given to this fact.

It is a serious concern that government and others throw around the terminology zero emission vehicles, because that is not a true representation of such vehicles, which still emit PM2.5, often at a great amount.

We cannot be moving from one problem or reducing fossil fuel vehicles, only to replace it with different problems from Electric and other non-fossil fuel vehicles.

EVs are being sold and promoted as though there is nothing to worry about and they are clean and green. This does nothing to explain the dangers of PM2.5 air pollution for example, and if people are not aware and vehicle use continues to rise then so will pollution, and so will calls for more new roads and lanes, which is a vicious downwards spiral for yet more destructive and harmful projects and yet more traffic and pollution.

Too much is currently being spent on destructive and harmful road projects, like the £10bn+++ LTC. In the case of the LTC it would not even be viable for public transport, as there wouldn't be adequate connections to make a bus route viable for the bus companies. Such a road also further divides communities which would likely result in more car use, leading to more pollution.

Neither is there any provision for active cross river travel with the proposed LTC. If as stated in the draft revised Air Quality Strategy government truly consider modal shift an important part of improving air quality, then provision for active travel has to be an essential part of any projects like the proposed LTC.

National Highways/LTC attempt to sell the project as having walking, cycling, and horse riding options within the project. However, the reality is that the paths they talk about are often realignments of existing routes, and/or routes that are pointless and offer no connection. In the Tilbury Fields area of the LTC design alone there are so many spiralling and zigzagging paths, which only serve to misleadingly attempt to make the amount of paths for the project look more impressive than they truly would be. There are even two paths in that area that run side by side.

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With no active cross river provision, even by means of a free cycle service in a similar way as the Dartford Crossing, the LTC is not a project that is in keeping with aims to encourage modal shift and improve air quality. Suggesting £3bn on active travel compared to £10bn+++ on just one road just shows how out of whack the proposed spending is, and what poor value for money new roads like the LTC would be. Projects like LTC do nothing to maximise the potential for walking and cycling. If anything, with the worsening of air quality from such projects it is also likely to have a negative impact on active travel, due to the impacts on active travellers from the road traffic and pollution.

Such huge projects also bring many years of construction along with all the associated traffic and air pollution, if it goes ahead.

How do you feel local authorities can most effectively reduce pollution from agriculture?

Something that concerns us in regard to agriculture in relation to the proposed LTC, is how much would be lost and impacted.

With growing pressures on farmers, and the serious matter of food security also, on top of climate change impacts, we cannot afford to be destroying and impacting agricultural land.

The less land the more farmers might be inclined to use more polluting chemicals to try and ensure their crops have the best chance.

There is also the issue that PM2.5 pollution impacts the soil, water and air for farming, and with deterioration of agricultural land, again farmers may become more inclined to use more polluting chemicals to try and improve things.

We need to be doing all we can to encourage and support sustainable farming for the benefit of all and to improve food security and air pollution, so we can all experience as healthy and sustainable future as possible.

How do you feel local authorities can most effectively improve indoor air quality?

No comment as not relevant to our position as a group

How do you feel local authorities can most effectively communicate air quality information?

Obviously, it is up to local authorities to work with government and others to communicate air quality information in the best way possible. But we would comment that air pollution is something people are very concerned about and want to have information readily and easily available.

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It is also essential that partners, such as National Highways are more forthcoming in providing such information to the public too. Particularly when it comes to projects like the proposed LTC. We have been asking questions about air pollution in this regard for years, and only very limited information is shared. With this and other aspects we have been told for way too long that all the relevant info would be made available when the Development Consent Order (DCO) application was submitted.

On their first attempt to submit the LTC DCO application in Oct/Nov 2020 National Highways withheld the application documentation until such time as the application was accepted. Since the application ended up being withdrawn this information was never provided to the public at that time.

With the second attempt, the application was accepted, and the information/documentation was made available at the time the application was submitted. However, we believe National Highways rushed to get the application submitted as they knew there were lots of policy changes and legal targets about to be announced.

For example, the legal targets for air pollution and other Environment Act targets were due to be set by the end of Oct 2022, and NH chose to resubmit the LTC DCO towards the end of October 2022. Surely with the LTC being such a huge project, it would have been more advisable to wait until the new targets were set so that relevant information could be included within the DCO application documentation.

We have since requested further information in regard to the proposed LTC and the newly set legal targets for air pollution, including PM2.5, from NH. We have been told they are still analysing things so that info is not yet available. With air pollution being such a serious health issue and concern to so many, this kind of information should be more readily available.

The lack of preparation of such info, knowing that new targets were being set, and those targets being suggested during the associated consultation, gives us little confidence in NH taking their responsibility in regard to air quality seriously.

Do you feel that there are additional powers relating to air quality which should be available to local authorities? Yes. If yes, please provide details.

You say you “want to ensure that local authorities, who are well-placed to decide how to clean up their air, have the necessary tools at their disposal and examine the reasons for why these are not being used to improve air quality in poorly performing areas”.

We stress the importance of local authorities representing their communities need to have the power to ensure that worsening air pollution from projects like the proposed LTC is provided. Just because a project is an NSIP doesn't mean that it should be pushed through regardless at any cost, both financially or the cost to health and well-being, and the environment.

Your document states “Local authorities should consider prevention and reduction of polluting activities in preference to only taking steps to improve air quality once exceedances have been identified.”

Yet local authorities (and communities) are ridden over rough shod by National Highways with projects like the proposed LTC. Not enough information is shared by NH with local authorities and communities during consultation. Not enough weight is given to concerns either. It cannot simply be a case of NSIP wins and then air pollution is looked into. As your document states prevention should be the preference.

What further support could government provide to help with actions taken locally to tackle air quality?

• ***Other (please specify)***

As before, government needs to help support local authorities who are opposing NSIPs that will worsen air pollution, rather than as seems to happen now whereby NSIP is a card that is played to trump any genuine concerns by others, regardless of how destructive and harmful the project is. This has to stop, and full and proper consideration needs to be given, with local authorities and communities comments/concerns given more weight.

To what extent do you agree or disagree that a new approach needs to be employed to promote consideration of the PM2.5 targets in the planning system?

We strongly agree that consideration of PM2.5 targets needs to be included in planning decisions, including NSIPs immediately.

We would also take this opportunity to again state that we do not believe the new legal targets for PM2.5 are ambitious enough. The level should be by 2030, not 2040. Evidence shows that this would be possible.

It is quite apparent as more and more evidence comes out on the dangers of PM2.5 that this is a serious public health issue that needs to be treated very seriously and as a matter of urgency.

What do you think are the merits or drawbacks of a design-stage emission prevention approach as set out in this chapter?

All developments, including NSIPs should have to address the impacts and harm of air pollution. Thorough up to date information needs to be shared at all stages from as early as possible with regular updates as projects progress.

The reporting should ensure that the estimates/data is realistic and not played down. With road projects realistic induced demand, which averages around 50% increase needs to be taken into account.

Considering the level of threat to peoples health air pollution needs to be something that holds more weight within proposals and planning decisions.

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Are there any additional assessment approaches or points we should consider when developing proposals to integrate the PM2.5 targets in the planning system? Yes, please provide details

Yes, more needs to be done to raise awareness and take into consideration the PM2.5 from electric vehicles when considering projects that involved traffic aspects. EVs should not be considered or referred to as zero emission vehicles, as that is simply not true.

The distance PM2.5 can travel and impact also needs to be considered. All too often when we have questioned National Highways about air pollution in regard to the proposed LTC we have been told air pollution disperses within 200 meters of the road. This is clearly not the case with PM2.5 which can travel thousands of miles. This is something that needs to be considered and addressed.

It is also essential that partners like National Highways give consideration to changes in air quality targets sooner rather than later, as already mentioned. They only appear to take into account things after they become officially acknowledged, rather than knowing new targets are imminent and ignoring it instead of planning ahead. With a government company like NH they should be looking out for the best interests of the people and communities, not us having to battle to get such important info out of them, and literally fighting for our right to breathe clean air.

Overall, how satisfied are you with our online consultation tool?

Since we prepared and sent our response as a pdf via email we didn't use the consultation response form, so are unable to comment.

However, we would comment that in general we were very surprised how short this consultation is, just 10 days, and how little it has been promoted. We have only had a short time to find out about it, review the associated information, and prepare and submit this response. Whilst it may be more aimed at local authorities, it is also important that others are informed and given an opportunity to participate too, as it is our lives that are at risk from air pollution, and something many are very concerned about.

We also note that various links within the consultation documents were incorrect. For example, the Cabinet Office 'Consultation Principals' link² appears to be out of date and does not take you to the correct page. On page 12 of 41 in Draft Air Quality Strategy³, within the case study the link for the Global Action Plan website⁴ is also incorrect. This is particularly unhelpful when time is so limited for the consultation.

We thank you for the opportunity to comment in response to this consultation. Should you wish to discuss our comments, or the topic with us further, please do not hesitate to contact us.

² <https://www.gov.uk/government/publications/consultationprinciples-guidance>

³ https://consult.defra.gov.uk/air-quality-strategy-review-team/consultation-on-the-draft-revised-air-quality-strategy/supporting_documents/Draft%20air%20quality%20strategy.pdf

⁴ <http://www.actionforcleanerair.org.uk/>