

**From:** [REDACTED]

**Sent:** Monday, July 29, 2024 8:30 AM

**To:** [REDACTED]

**Subject:** Cancel Lower Thames Crossing (LTC): an Opportunity to save a few £Billion, Reduce Environmental Destruction and Promote Active Travel

To:

Rt Hon Louise Haigh, Secretary of State for Transport

Rt Hon Steve Reed, Secretary of State for Environment, Food and Rural Affairs

Rt Hon Rachel Reeves, Chancellor of the Exchequer

Rt Hon Ed Miliband, Secretary of State for Energy Security and Net Zero

Firstly, congratulations on forming the new government and good luck!

I enclose my previous submissions regarding my opposition to the LTC. The situation has got even more urgent now and I would like to emphasize a few key points.

## Key Objections

### Climate Change & Environment

- Unacceptable adverse effects on air pollution, increased traffic density in already congested urban areas, human and animal health, biodiversity, destruction of Green belt including ancient woodlands, noise pollution as well as adding to the impenetrable barriers for active travel created by major road infrastructure. It is alleged that new roads bring much needed growth, but they also bring human and environmental destruction in equal measure which have high direct costs to government and society.
- The proposed new road is a potential breach of government's legal obligations under the [Climate Change Act 2008 c.27](#) and the [Environment Act 2021 c.30](#), especially in relation to biodiversity and air pollution targets.
- Highways England has committed to PAS2080 'Carbon Management in Infrastructure' in several documents including Local Transport Notes (LTN) but a key aspect PAS 2080 is the carbon emission reduction hierarchy, which has not been complied with. Ref: <https://nationalhighways.co.uk/our-work/environment/we-achieve-pas-2080-accreditation/>

### It's Not Fit for Purpose

- The LTC will not alleviate congestion overall but will simply move it a few miles down the road
- The design will force all the diverted traffic onto the already highly congested A127 including the woefully inadequate and dangerous junction and flyover at Gallows Corner, which was meant to be only a temporary structure but has been there for 50 years
- Foreseeable adverse events, such as severe congestion at the existing Dartford crossing, have not been assessed (LTC project engineers confirmed to me that they do not assess predictable adverse events during traffic planning) yet such a scenario would just cause worse gridlock as the design has not allowed for it

### **Integrated Active Transport Infrastructure**

- Proposals for active travel are vague and piecemeal, do not commit to building paths to recognised standards such as [LTN1/20 Cycle Infrastructure Design](#) or linking them to a wider active travel network. There is no provision for carriage of cycles or pedestrians across the LTC.
- It is a missed opportunity to build an integrated transport system including rail connections between Essex, Kent and Greater London
- Longer term, a new Thames Flood Barrier will be required to reduce flooding risk to London, so perhaps additional crossings could be integrated into such a scheme

### **Quicker Routes to Growth**

- Your government's economic strategy relies heavily on growth but the several billion cost of the LTC will not deliver so-called growth for perhaps a decade
- Such large projects will require a large workforce who could be better employed building new homes or hospitals that would deliver tangible benefits sooner
- This scheme is aimed at reducing congestion in SE England but there is already an over-concentration of resources in the South-East of England and money would be better spent of improving the infrastructure in the North instead of exacerbating the overheating in the SE

### **If the Project is Cancelled, Please Build the Proposed Footbridge Over the A127 and Target Active Travel**

- The one benefit of the proposed LTC would be the construction of a bridge for pedestrians, bicycles and horse riders across the A127 near M25 J29. I appreciate that funds are tight but please go ahead with this even if the LTC is cancelled
- The A127 and M25 act as an almost impenetrable barrier to active travel for local residents. The few roads available are very heavily trafficked, do not have footpaths and the few bridleways that exist are either quagmires in Winter or require crossing very busy dual carriageways (a pedestrian was killed recently trying to attempt this).
- A small percentage of the monies freed up by cancellation spent on active travel would provide huge improvements to public health and cut costs to the NHS and wider society

### **If the Project is Given the Go Ahead, I Request:**

- That the new crossing does not sever or obstruct existing routes used by walkers, cyclists and horse riders and facilities are made available for walkers and cyclists to use the new crossing
- That additional measures are taken to block noise and air pollution from adjoining areas along its route
- That HGV movements on local roads are minimised and all HGVs have at least a three star Direct Vision rating

### **Future Generations will applaud you**

- I have retired from a career in human and environmental sustainability. As a scientist and corporate environmental auditor, I had to communicate in a neutral, objective tones, but I feel increasingly emotional when I see the ecosystems, upon which we all depend, deteriorating at a shocking rate.
- We are sleepwalking into an environmental catastrophe of our own making. The foundations of human life as we know it are buckling under the weight of our needs and desires: firestorms scorch the earth, typhoons and floods blast humanity and habitats, people flee from increasingly fevered and often war-torn climates to the comparative sanctuary of the UK
- We simply cannot carry on in this mindless destruction

However, I am an optimist by nature, and I believe that every disaster also brings opportunity, so I urge you to take bold action as soon as possible.

Dr Tim Stout

[REDACTED]

---

**From:** Tim Stout [REDACTED]  
**Sent:** Wednesday, September 8, 2021 8:43 PM  
**To:** [REDACTED]

**Subject:** LTC Consultation Response

I strongly oppose the proposed Lower Thames Crossing for the reasons given in the attached pdf.

Key message

- If we truly care about the future of our children, aggressive and sustained mitigation of transport-related environmental damage is urgently required to help meet legally binding targets for the UK to become carbon neutral. The LTC consultation completely ignores the fundamental need to consider this proposed development in a wider context as part of a UK-wide integrated transport strategy.
- The LTC proposal has not followed its own stated aim of adhering to the Green Construction Board carbon hierarchy which requires that alternative approaches be considered before building any new facility.
- The LTC proposals are inadequate to address the projected demand for non-motorised transport and do not follow Department of Transport guidance on cycle infrastructure design and other guidance relating to safer streets. Failing to do this places additional risks and cost on local communities and society generally.

Regards

Dr Tim Stout



UK Parliament Disclaimer: this e-mail is confidential to the intended recipient. If you have received it in error, please notify the sender and delete it from your system. Any unauthorised use, disclosure, or copying is not permitted. This e-mail has been checked for viruses, but no liability is accepted for any damage caused by any virus transmitted by this e-mail. This e-mail address is not secure, is not encrypted and should not be used for sensitive data.

---

This email has originated from external sources and has been scanned by DfT's email scanning service.

---

# Response to Lower Thames Crossing (LTC) Consultation

## Key Messages

*If we truly care about the future of our children, aggressive and sustained mitigation of transport-related environmental damage is urgently required to help meet legally binding targets for the UK to become carbon neutral. The LTC consultation completely ignores the fundamental need to consider this proposed development in a wider context as part of a UK-wide integrated transport strategy.*

*The LTC proposal has not followed its own stated aim of adhering to the Green Construction Board carbon hierarchy which requires that alternative approaches be considered before building any new facility.*

*The LTC proposals are inadequate to address the projected demand for non-motorised transport and do not follow Department of Transport guidance on cycle infrastructure design and other guidance relating to safer streets. Failing to do this places additional risks and cost on local communities and society generally.*

## 1 Objections to overall scheme

I strongly oppose the proposed Lower Thames Crossing for the following reasons:

### Environmental Damage and Contribution to Climate Chaos

In the face of an impending environmental crisis, we must all seriously question whether unlimited growth in vehicular traffic is necessary, desirable, or indeed physically possible.

*"Curing congestion by adding more roads is like trying to cure obesity by buying bigger pants."* (Lewis Mumford, 1955). There is ample evidence that new roads generate more traffic.

The underlying assumption upon which extra roads are justified seems to be that they generate additional economic activity. This may be the case, but no consideration seems to have been given to how alternative ways of spending several billion pounds could also improve our economy.

The "economy" is ultimately a description of how communities interact in a material sense, but the term is often defined in the narrow sense of how much profit can be made by a few large corporations. A rebalancing of the "economy" focussing on local businesses and the common prosperity of society in general is necessary if we are serious about limiting the devastating effects of climate change on future generations.

Road-generated "growth" also causes negative growth when the total burden on society is taken into consideration, for example, accidents, air pollution, noise, division of community by road-barriers, destruction of pristine environmental habitats, loss of biodiversity etc.

### Maintain our Current Infrastructure

Our current infrastructure is poorly maintained, for example, the numerous potholes which create a real danger to cyclists and pedestrians and risk serious damage to motor vehicles. I know numerous cyclists who have accidents due to hitting deep potholes in some cases resulting in severe injury.

The many £Billion to build the LTC would be better spent on maintenance of existing infrastructure.

## Intergovernmental Panel on Climate Change (IPCC) Report on Transport

The latest Intergovernmental Panel on Climate Change (IPCC) is a highly respected and authoritative analysis of the causes and effects of climate change ([Reports — IPCC](#)). Chapter 8 in the latest 2021 report concerning transport is highly relevant to the LTC ([ipcc wg3 ar5 chapter8.pdf](#)).

*“Reducing global transport greenhouse gas (GHG) emissions will be challenging since the continuing growth in passenger and freight activity could outweigh all mitigation measures unless transport emissions can be strongly decoupled from GDP growth (high confidence).”*

*“Without aggressive and sustained mitigation policies being implemented, transport emissions could increase at a faster rate than emissions from the other energy end-use sectors”*

*“Direct (tank-to-wheel) GHG emissions from passenger and freight transport can be reduced by:*

- avoiding journeys where possible—by, for example, densifying urban landscapes, sourcing localized products, internet shopping, restructuring freight logistics systems, and utilizing advanced information and communication technologies (ICT)*
- modal shift to lower-carbon transport systems—encouraged by increasing investment in public transport, walking and cycling infrastructure, and modifying roads, airports, ports, and railways to become more attractive for users and minimize travel time and distance.”*

## High Carbon Cost of LTC

LTC will generate an additional 5M tonnes CO<sub>2</sub> emissions ([6.3-ES-Appendix-15.1-Carbon-and-Energy-Plan.pdf \(thamescrossingactiongroup.com\)](#)). Non-fossil-fuel powered vehicles are likely to be more common when the LTC is completed, but although they generate less CO<sub>2</sub>/NO<sub>x</sub> locally they still generate adverse societal and environmental impacts nationally and locally (much of vehicular noise is from tyres and tyre/brake dust is still an issue as are vehicular accidents).

I am very concerned about the destruction of green-belt land, in particular ancient woodland and hedgerows. The proposed amelioration measures are a token gesture but cannot replace the ancient woodland and hedgerows that have taken many generations to develop a diverse and species-rich habitat.

By encroaching onto designated green belt, the LTC increases the risk of urban sprawl, and is yet another chunk out of the green belt and the local ecology. Other major cities, without protection of green belt type legislation have suffered from massive urban sprawl, effectively linking them together as huge conurbations.

The true environmental and community value of a particular area is not limited to the boundaries of that area because wildlife does not respect human created boundaries. Rare or unusual species often needs to build up a reservoir population to survive long term and that population may rely on surrounding green areas to thrive, so the total ecology of a wider area needs to be considered.

Any number of small disjointed artificial parks are a poor substitute for continuous swathe of green belt.

## Potential Flood Risk

The flood risk assessment for the LTC has not been released, but catastrophic storms are becoming more common, (e.g., recent UK events such as Yorkshire and elsewhere including London) and such

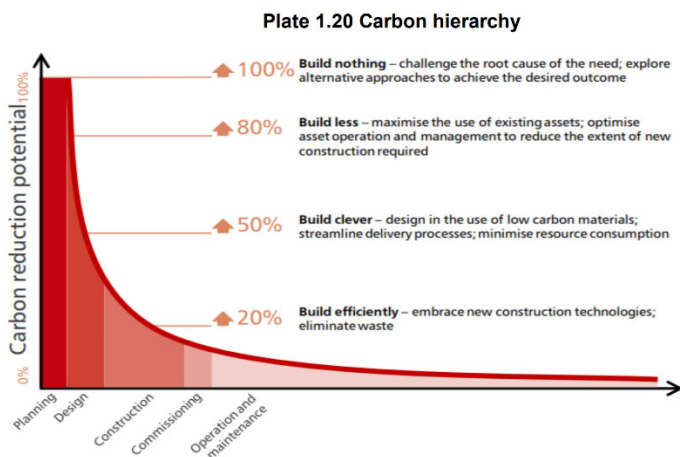
storms could cause massive flooding in low lying areas. Flood mitigation measures could be overwhelmed or not be adequately maintained/blocked/ineffective. Flood risk projections are typically based on probabilistic 100-year floods, but experts are warning that these projections are rapidly becoming invalid as recent events have amply demonstrated. It is quite possible that “100 year” events will become commonplace and truly catastrophic 500- or 1000-year events will become a distinct possibility for which any new project should be designed to cope with.

Sea levels are rising faster than anticipated and will require flood defences to be raised along the Thames Estuary. The cost of the LTC would be better spent if allocated to sea and flood defences.

### Is LTC needed at all

The first priority in any proposal should be to question the need for it.

Lower Thames Crossing, 6.3 Environmental Statement, Appendix 15.1 Carbon and Energy Plan page 37, para 1.4.5 states that "carbon reduction opportunities have been identified, using the carbon hierarchy developed by the Green Construction Board and set out in PAS 2080 (Plate 1.20)."



The next para 1.4.7 discusses carbon reduction opportunities but the crucial first step, as stated in the hierarchy, is to “Build nothing” i.e., not to build the LTC all. However, there is no analysis of the root causes of congestion or exploration of alternative approaches to road building in the carbon & energy plan. This is a serious omission.

### Need to Integrate Our Approach to Transport

The highway engineering profession seems to have one key goal: move cars quickly from one place to another. This approach is destroying our planet and our society with it and the impending climate crisis demands that government take the lead on rethinking our entire approach to transport.

<https://highwaysengland.co.uk/publications/>. Highways England "Net zero highways" publication addresses the operational impact of highways but does not tackle the far greater issue of environmental damage from vehicular transport and how growth can be limited.  
<https://highwaysengland.co.uk/media/eispcjem/net-zero-highways-our-2030-2040-2050-plan.pdf>).

In similar vein the biodiversity work is welcome but does not address the destruction of pristine habitats and green belt by the construction of new roads:

<https://highwaysengland.co.uk/media/2owaqcdd/biodiversity-report-2018-19.pdf>).

In the justification for the project (<https://highwaysengland.co.uk/our-work/lower-thames-crossing/why-is-the-lower-thames-crossing-important/>) there is no mention of potential for improvements to the public transport network. The unstated but underlying assumption seems to be that private vehicular transport must be prioritised above other modes and the option of reducing traffic levels and thereby avoiding the need for the LTC, for example by providing low-cost, convenient and sustainable forms of transport, have not been explored.

For example, Covid-19 has amply demonstrated that many jobs that formally required face-to-face meeting can be done remotely via the internet. Ultra-high-speed broadband (over 1000 MPS) is common in some developed nations and a nationwide rollout of such an infrastructure in the UK could further reduce the need for travel, freeing up road capacity.

Few people will be dumping their car soon, but we certainly should all be trying to drive fewer miles, so the roads we already have are probably more than enough if traffic growth is managed properly.

Electrically powered bicycles are already becoming commonplace and give people the option of leaving their car at home for longer commutes, thus reducing congestion. These are likely to be even more popular by the projected completion date of the LTC and demand for low-traffic routes is likely to increase considerably. The economic and environmental cost of providing cycle facilities is very low compared to major infrastructure such as the LTC.

The Welsh government has suspended new road building, as part of the plan to reach net zero emissions by 2050 ([Freeze on new roads projects to be announced | GOV.WALES](#)).

*"Since 1990, Welsh emissions have fallen by 31%. But to reach our statutory target of net zero emissions by 2050, we need to do much more. In the next 10 years, we are going to need to more than double all the cuts we have managed over the last 30 years, if we are going to keep temperature rises within safe limits. That means changes in all parts of our lives. Transport makes up some 17% of our total emissions and so must play its part.*

*We need a shift away from spending money on projects that encourage more people to drive and spend more money on maintaining our roads and investing in real alternatives that give people a meaningful choice."*

This is a bold and courageous decision that Highways England should take note of.

Much of the growth in traffic at the Dartford Crossing and regionally is due to the over-concentration of UK resources in the South-East. A UK-wide strategic approach to rebalance the UK economy to the North has been touted by politicians but not acted upon.

### **No Vision for a Zero-Carbon Future**

There is no vision in this document for a low-carbon world (e.g., net zero by 2050). By the time LTC is complete a substantial proportion of vehicles will hopefully be powered by non-fossil fuels, but this should not make us complacent. Electrically powered vehicles still create a massive environmental and societal burden so are not the panacea that some are suggesting.

### **No Provision for Alternative Means of Transport**

The consultation documents note "There would be 46km of new, realigned or improved footpaths, cycleways and bridleways". However, most of these are realignments to existing rights of way affected by the LTC.

I see no vision for an integrated transport network that includes, for example, a network of cycle routes as would be the norm in some European countries (Netherlands and Germany being prime examples). The proposed provision for cyclists is rudimentary at best and does not follow the letter or spirit of government guidance ([Cycle infrastructure design \(LTN 1/20\) - GOV.UK \(www.gov.uk\)](#)).

There is also no consideration given to improved cross-Thames heavy/light rail/bus infrastructure which could help ameliorate traffic levels.

### No Bicycle Shuttle Service

The rejection of my and others' suggestions for a bicycle shuttle service at the LTC is disappointing. As a former regular commuter from Upminster to Dartford, I frequently opted to cycle and regularly used the facility to transport bicycles over the Dartford Crossing – thus helping to reduce congestion. The Tilbury-Gravesend ferry is not as useful an option due to the limited hours of service.

### Not Fit for Purpose

LTC is touted as an alternative to the Dartford Crossing but connections from the M25 to the LTC in cases of snarl ups on the Dartford Crossing seem woefully inadequate and in practice will just divert the queues somewhere else so the LTC will not solve the Dartford Crossing problems.

For example, there is no link northbound from the LTC to the westbound A13 so if the Dartford crossing is congested northbound (which, as a former commuter to Dartford, I know happens often) then drivers will have to divert to the M25 J29 & A127. The A127 is already at full capacity at peak times and the resulting long queues are likely to cause drivers to divert via Upminster/Hornchurch/Harold Wood suburban areas, which are already very Busy.

I asked about this at the Upminster LTC consultation and an analysis of likely effects has not been conducted.

## 2. Proposed changes if LTC is constructed

If the LTC is given the go-ahead, then additional attention needs to be given to facilities for pedestrian and cyclists.

My comments only relate to the Upminster area based on my detailed knowledge, but other areas affected by the scheme need further consideration to improve non-vehicular access.

### Government Guidance on Cycle Infrastructure

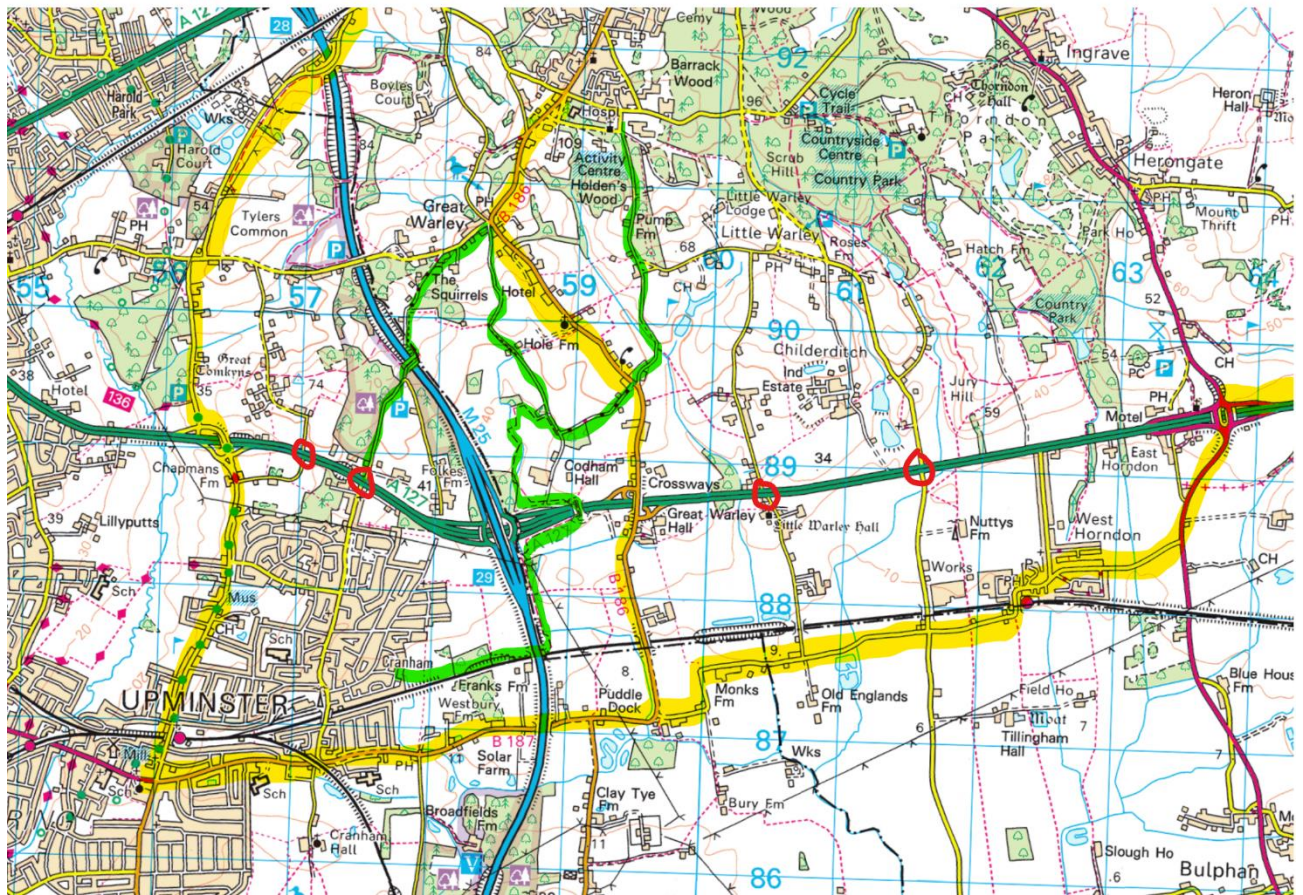
[Cycle infrastructure design \(LTN 1/20\) - GOV.UK \(www.gov.uk\)](#)

“There are significant and cost-effective opportunities to provide cycle infrastructure during the construction and maintenance of highway works, particularly in new developments. This is recognised in the National Planning Policy Framework and the Local Cycling and Walking Infrastructure Plan Guidance. It is important that cycle infrastructure requirements are embedded into local authority planning, design and highway adoption policies and processes. This will ensure that good quality cycle infrastructure is delivered in all new developments, new highways and highway improvement schemes”

“14.1.2 Appropriate cycle facilities should be provided within all new and improved highways in accordance with the guidance contained in this document, regardless of whether the scheme is on a designated cycle route, unless there are clearly-defined and suitable alternatives.”



## Cycle Routes to the North & East of Upminster



At present there are few options for cyclists or walkers to travel the north and east from Upminster. The road routes highlighted in yellow are not pleasant to cycle on, being quite busy and/or difficult for cars to pass. Also, congestion on the M25 causes traffic to divert via these minor roads, especially at peak hours when cycle commuters also use these roads. The minor road via West Horndon is usually quiet but to proceed eastwards requires negotiating the A128/A127 roundabout which can be quite busy with fast moving traffic.

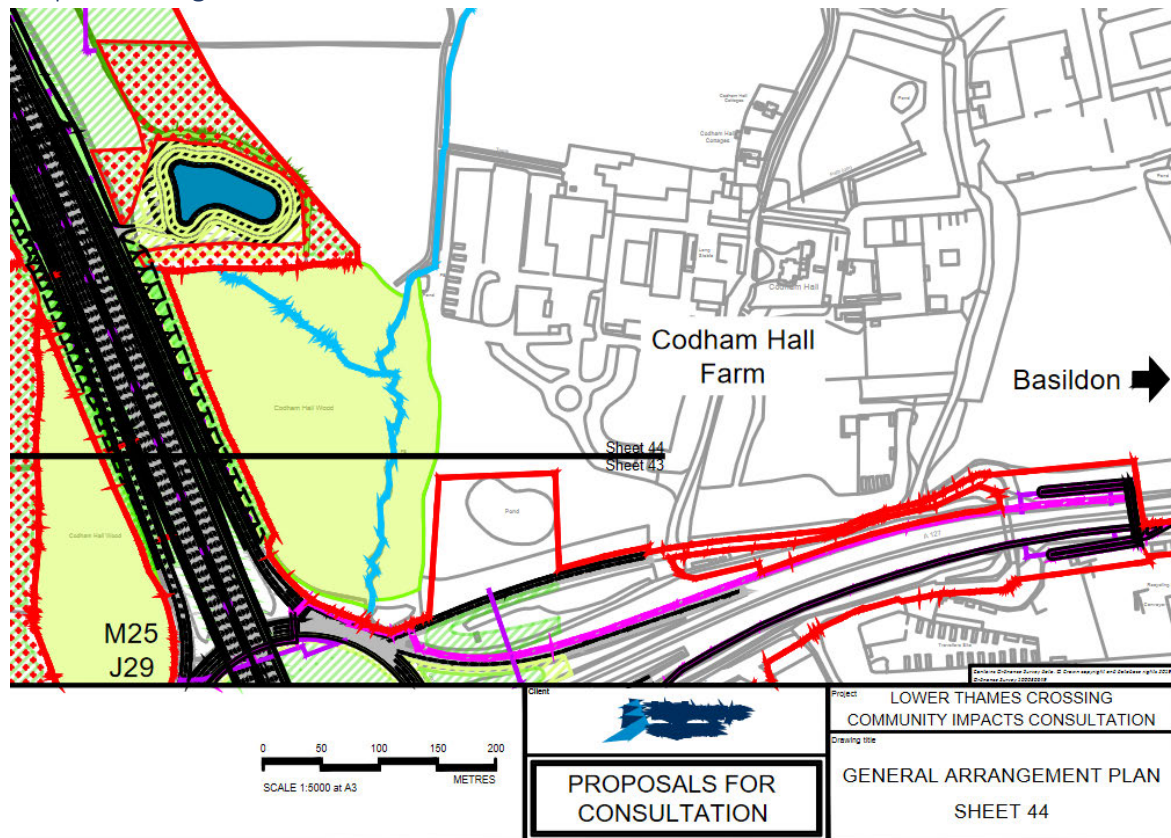
The routes highlighted in green are off-road or minor road routes, but these will be closed or severely impaired for several years during the construction phase. The route to the east of Cranham under the M25 and over the A127 is frequently used by walkers and cyclists but will be closed for several years during LTC construction.

The route via Front Lane to Folkes Lane requires a highly hazardous crossing of the A127 dual carriageway which is only viable at low traffic periods. Access to Folkes lane is possible via the wide footpath on the north side of the A127 but the LTC construction plans show a construction utility compound at the north end of Folkes lane so this route may also be impaired for long periods.

There are wide footpaths alongside parts the A127, but these are interrupted at the M25 and A128 junctions where is difficult and/or highly dangerous to cross the traffic. The increased traffic resulting from the LTC will only make this worse.

The junctions circled in red are effectively barriers to cyclists and pedestrians as they require the extremely hazardous crossing of four lanes of fast-moving traffic.

## Proposed Bridge across A127 to East of J29



"To alleviate the concern about the loss of public rights of way, following supplementary consultation, we resolved the severance caused by the project at junction 29 of the M25, as the new free-flowing slips to the south of the junction were cutting off the existing crossing through the south of the junction. At the design refinement consultation, a new bridge was proposed to allow those using the southern pathway alongside the A127 to cross to the north pathway and pass beneath the M25 on the north side of the junction before crossing back to the south using a crossing further west. This part of this route, and the new bridge were redesigned to be used by cyclists following the design refinement consultation"

([https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/You%20said%20we%20did.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/You%20said%20we%20did.pdf))

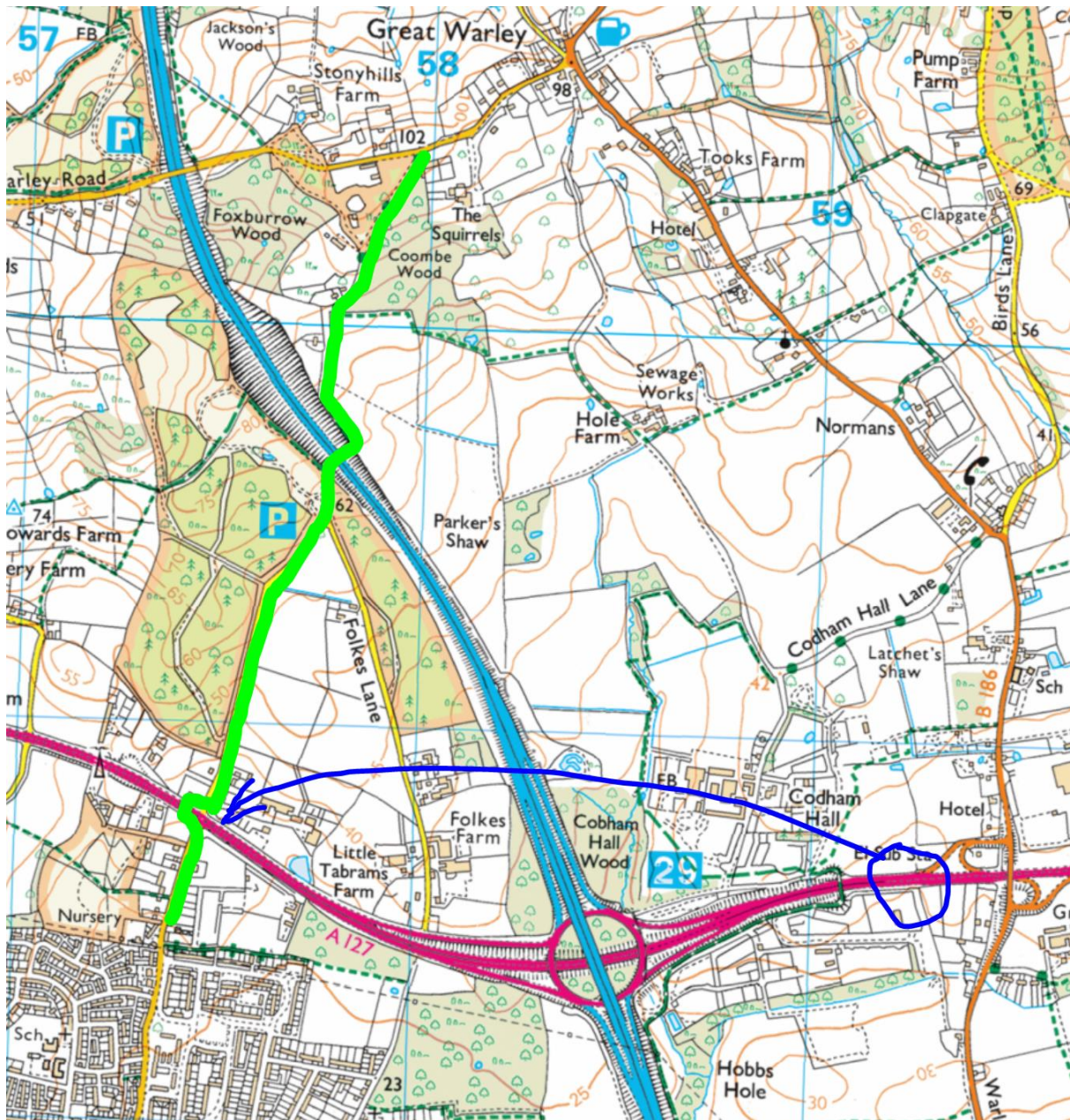
Consideration of the needs of pedestrians and cyclists is welcome response to earlier objections. However, the proposed bridge across A127 to the east of M25 duplicates the existing nearby bridge at Codham Hall Lane and it is not clear how this would help matters as feeder routes may be closed during construction.

### Relocate the proposed additional bridge

I propose that this additional bridge should be relocated to cross the A127 from Front Lane to Folkes Lane, Upminster (shown in blue on enclosed map).

Combined with improvements to the path from Front Lane, via Folkes Lane and Beredens Lane, this would make an ideal quiet route to the north-east of Upminster (highlighted in green on the enclosed map).





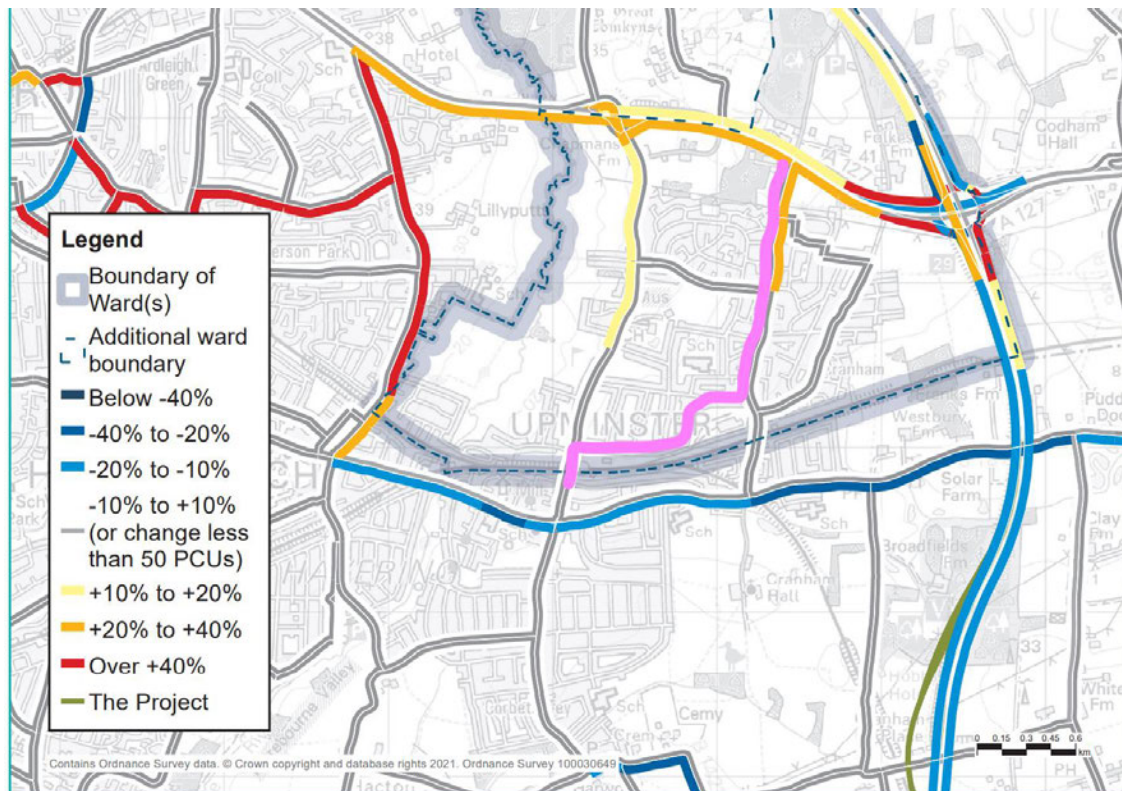
### Closure of Front Lane to A127

The exit of vehicular traffic from Front Lane onto the A127 westbound is quite hazardous due to the lack of an adequate slip road and the substantially increased predicted traffic levels on this section will make exiting Front Lane highly dangerous. I propose that the exit from Front Lane onto the A127 is permanently closed for safety reasons (make it accessible for emergency vehicles only).

Even though I personally use the exit from the westbound A127 into Front Lane when travelling by car I feel that the additional fast-moving traffic generated by the LTC justifies closing Front Lane at this point. Traffic modelling by LTC shows a 20-40% increase (additional 50-250 passenger car units per hour) in morning peak traffic flows along Front Lane which is a busy bus route and used by many children walking to the nearby schools.

LTC have not conducted traffic flow modelling for abnormal scenarios but, in my experience, traffic problems on the M25 lead to extra congestion in Cranham/Upminster and sometime total gridlock because traffic tries to divert via this route. Closing the northerly entrance to Front Lane would also

make Cranham a more pleasant place to live by reducing traffic along the “rat-run” down Front Lane/Ingrebourne Gardens/Deyncourt Gardens (drawn in pink line on diagram).



Additional pedestrian/cycle crossing facilities and segregated paths should be provided in any areas subject to increased traffic flow to mitigate the risk of accidents.

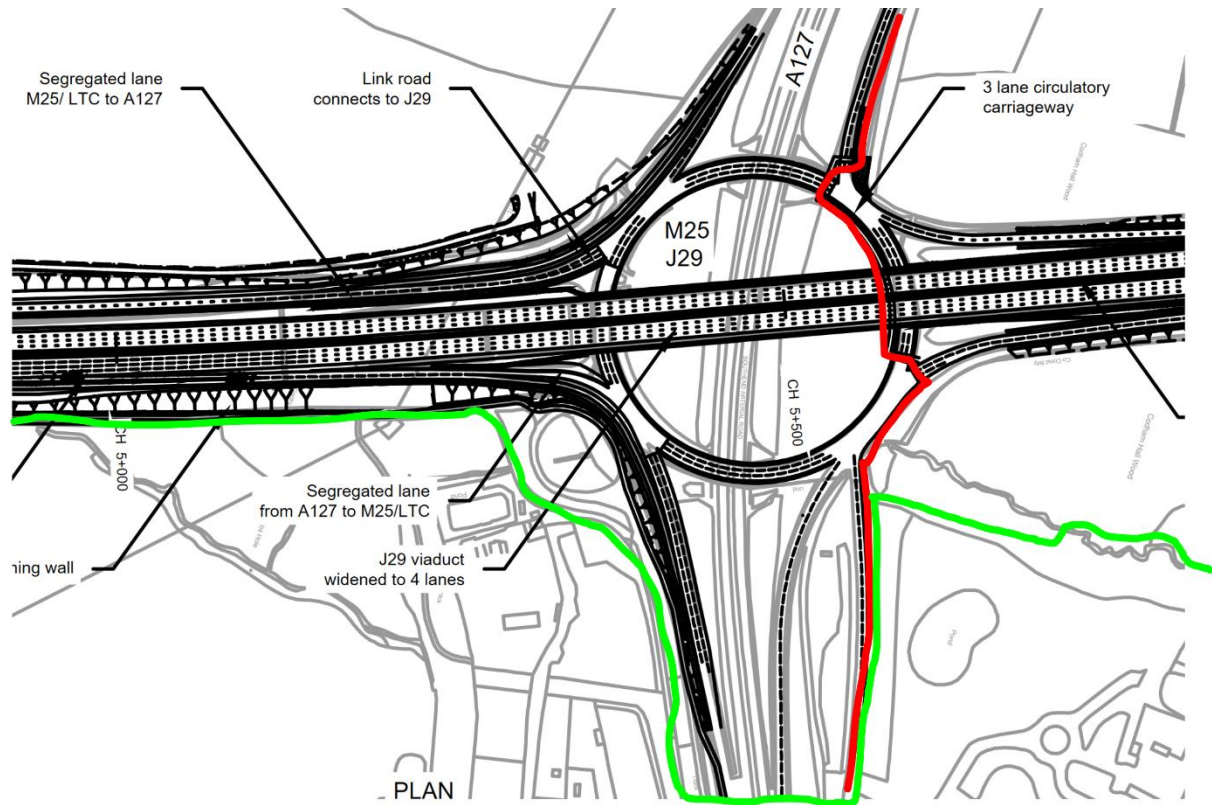
### A127 Cycle Paths

Although outside the immediate scope of the LTC consultation, the knock-on effects of increased traffic along the A127 should be considered as part of the project. The flyover across the A12/A127 junction is well beyond its design life and its replacement overdue. Also, navigating the A127/J29 roundabout by foot or cycle is possible but very hazardous and proceeding eastwards along the A127 footpath is very difficult due to the slip roads at the B186 Warley Road junction.

Electrically powered cycles are also likely to be increasingly common and will reduce road congestion by allowing longer commutes to be done by bicycle. This would be an ideal opportunity to create an integrated east-west cycle route alongside the A127 and reduce vehicular congestion along this route and surrounding areas.



## M25 J29 Roundabout



As the J29 roundabout will be fully traffic light controlled (a welcome improvement) cycle/pedestrian lights should be incorporated (e.g., as shown in red). Improvements to the east at Warley Road would also allow cyclists/walkers to continue eastwards. The cost of such improvements would be miniscule compared to the overall LTC costs.

The significant overall increase in traffic volume along this stretch of the A127 should also prompt a review of the safety of other minor road junctions. For example, I have seen numerous examples of eastbound traffic on the A127 having to brake sharply for traffic entering/exiting Folkes Lane so consideration should be given to creating/lengthening slip roads for such minor roads where they join the dual carriageway. Bird Lane on the south side of the A127 should also be closed to motor vehicles at the A127 end as it is very seldom used.

Dr Tim Stout  
 [REDACTED], 8-Sep-2012