

TRANSPORT FOR LONDON

M25 JUNCTION 28 IMPROVEMENTS – RESPONSE TO RULE 17 LETTERS AT DEADLINE 8

9 JUNE 2021

I. Introduction

1.1 This document provides TfL's response to the Examining Authority's (ExA's) Rule 17 letters concerning Change Requests 7 and 8 issued on 26 May 2021 and on the London Plan 2021 issued on 27 May 2021. TfL's response to these requests for information are provided in Sections 2 and 3 of this submission respectively.

2. Change Request 8

- 2.1.1 The ExA has requested views on whether Change Request 8, a revision to the alignment of the egress from Grove Farm onto the new A12 eastbound off slip road, constitutes a material change to the application, either individually or cumulatively, and whether or not it falls within the scope and assessment of the Environmental Statement.
- 2.1.2 TfL has reviewed the materiality in terms of the transport impacts specifically, being TfL's area of responsibility and expertise. TfL has not reviewed any other environmental impacts of the proposal.
- 2.1.3 TfL considers that Change Request 8 will have no material impacts on road safety, traffic flows or delays, given that the egress joins the new A12 eastbound off slip is only approximately 25 metres west of the position previously proposed. On this basis TfL's view is that the scope and assessment of the Environmental Statement with regard to transport impacts covers the proposed change.

3. The London Plan 2021

3.1 Introduction

3.1.1 The London Plan 2021 was adopted in March 2021 during the Examination for the M25 Junction 28 Improvements scheme. The ExA has asked for the views of TfL and other Interested Parties about whether the London Plan 2021 has any bearing on the Proposed Development. TfL has set out its views in this section with regard to the transport policies within the London Plan 2021 which cover TfL's area of responsibility and expertise. The Greater London Authority (GLA) has reviewed and endorsed TfL's response on the London Plan 2021.

3.2 Strategic Infrastructure Priorities

- 3.2.1 The M25 Junction 28 improvements scheme lies within the Great Eastern Mainline (London – Ipswich – Norwich) and A12 Strategic Infrastructure Priority, which is identified in London Plan Policy SD3 (Growth locations in the Wider South East and beyond) and Figure 2.15) and links to the Elizabeth Line East growth corridor within London (Figure 2.9).
- 3.2.2 Policy SD3 states: "The Mayor will work with strategic and local authorities, Government and other interested partners to realise the growth potential of the WSE [Wider South East] and beyond through investment in strategic infrastructure to support housing and business development in particular in growth locations to meet need and secure mutual benefits for

London and relevant partners.” The M25 Junction 28 improvements scheme provides additional capacity, so is compliant in this respect.

3.3 Housing growth

3.3.1 Table 4.1 of the London Plan 2021 sets out ten-year targets for housing completions including 12,850 new homes in Havering. This is an increase over the housing targets in the 2016 London Plan. TfL has raised concerns during the examination for the M25 Junction 28 improvements scheme that the modelling of traffic impacts has not adequately considered the level of growth in new homes expected in London, including in its Relevant Representation (examination document reference RR-028 paragraph 7.2) and Written Representation (REP2-036 paragraph 7.II). The Applicant’s methodology considers a small number of specific developments in close proximity to the DCO boundary rather than the forecast growth in the London Plan and Local Plans. While the Applicant has undertaken a high growth sensitivity test which showed that the traffic impacts of the scheme are manageable, it is not clear whether the level of growth assessed is higher, lower or equivalent to the housing targets in the London Plan.

3.3.2 The Applicant has resisted undertaking any further sensitivity tests that were requested. Based on the information provided by the Applicant that has been made available, TfL reached the conclusion that, on balance, the inclusion of the levels of growth included in the London Plan 2021 and adopted or emerging Local Plans is unlikely to substantially change the relative impact of the scheme on traffic flows and delays. However, it would have been more appropriate for the Applicant to have provided evidence to demonstrate this rather than some uncertainty remaining.

3.4 Policy T1 – Strategic approach to transport

3.4.1 Policy T1 sets out a strategic approach to transport including delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This underpins all other transport policies. Paragraph 10.1.2 states that “a shift from car use to more space-efficient travel also provides the only long-term solution to the road congestion challenges that threaten London’s status as an efficient, well-functioning globally-competitive city. Reliable deliveries and servicing, and easy access to workplaces and key attractions are dependent on an increasingly-efficient transport network. Roads will continue to play a vital role in this, and greater priority needs to be given to making them more efficient for those activities that depend on them the most.”

3.4.2 The M25 Junction 28 improvements scheme cannot be expected to make a substantial contribution towards increasing the sustainable mode share although it should be designed so that it does not undermine efforts to achieve this target. However, it does contribute to helping ensure reliable deliveries and servicing, and to making the network more efficient, by providing a direct link from the northbound M25 to eastbound A12 and reducing the congestion that would otherwise occur at this junction. This reduction in congestion is also expected to reduce delays that would otherwise be experienced by TfL bus route 498 between Romford and Brentwood.

3.5 Policy T2 – Healthy Streets

3.5.1 This policy states that: “Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators”. It further requires that “Development proposals should:

- l) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance

- 2) reduce the dominance of vehicles on London's streets whether stationary or moving
- 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

3.5.2 The M25 Junction 28 scheme has not been assessed against the Healthy Streets Indicators. However, with the inclusion of the upgrade to the Non-Motorised Users (NMU) route now to be delivered as part of the scheme, it can now be shown that the scheme improves the local walking and cycling network. This measure is aligned with Healthy Streets principles and would contribute towards achievement of mode share targets by offering enhanced opportunities for active travel.

3.5.3 Reference is also made in paragraph 10.2.8 of the London Plan 2021 to the Mayor's ambition to reach Vision Zero by 2041 - a long-term vision to reduce road danger so that no deaths or serious injuries occur on London's streets. While the Vision Zero action plan has not been specifically referenced in the Transport Assessment for the M25 Junction 28 improvements scheme, the Applicant set out in its response to Relevant Representations (REPI-002 table row RR-028-12) that the aims of the Vision Zero action plan align with the National Policy Statement for National Networks "which will be the primary basis for decision making for the Scheme. There is a strong alignment between the aims of the Mayor's Transport Strategy and the Vision Zero plan with the objectives and the expected outcomes of the Scheme relating to a reduction in incidents and improving safety."

3.5.4 TfL agrees that on the basis of the above, the scheme is broadly aligned with Vision Zero and therefore the London Plan 2021 on this specific issue. However, TfL remains concerned about the lack of evidence provided by the Applicant about the safety of the pedestrian crossings of the A12 eastbound off slip road and A12 westbound on slip road. These concerns are outlined in more detail in section 4.2 of TfL's main Deadline 8 submission.

3.6 Policy T4 – Assessing and mitigating transport impacts

3.6.1 Policy T4 emphasises that Transport Assessments should focus on embedding the Healthy Streets Approach. It further requires that:

- "Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified."
- "The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated."
- "Development proposals should not increase road danger."

3.6.2 The pedestrian and cycle improvements that will now be delivered by the M25 Junction 28 improvements scheme as part of the Designated Funds upgrade to the NMU route improve walking and cycling, as set out in section 3.4 above. With the exception of the pedestrian crossings of the new A12 eastbound off slip road and westbound on slip road (see paragraph 3.5.4 above), sufficient evidence has also been provided that the scheme does not increase road danger.

3.7 Policy T5 – Cycling

3.7.1 Policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.

3.7.2 The Designated Funds scheme that will be delivered as part of the M25 Junction 28 improvements project will provide a significantly enhanced cycle route between Harold Wood and Brentwood. On this basis, TfL considers the scheme to be compliant with Policy T5.

3.8 Policy T7 – Deliveries, servicing and construction

3.8.1 Policy T7 states that development proposals should facilitate sustainable freight movement by rail, waterways and road. It also requires that during the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

3.8.2 Overall, the M25 Junction 28 improvements scheme will facilitate freight movement by road, and reliable deliveries and servicing, by providing a direct link between the northbound M25 and eastbound A12, freeing up capacity and reducing delays for other movements via the roundabout.

3.8.3 During the construction phase of the project, measures have been identified to provide a safe route for those walking and cycling. However, for those travelling to and from the north side of the A12, some walkers and cyclists will need to take a much longer route via the subway under the A12 at Petersfield Avenue while the pedestrian route along the north side of the A12 is closed. The Applicant will need to ensure this route is safe with appropriate signage to avoid the risk of pedestrians or cyclists attempting to cross the A12 further east at unsafe locations. Provided these measures are put in place, the scheme can be considered to be compliant with the London Plan 2021 in this regard.