

TRANSPORT FOR LONDON

LOWER THAMES CROSSING – RELEVANT REPRESENTATION

24 FEBRUARY 2023

1. Introduction

- 1.1 Transport for London (TfL) is the integrated transport authority for Greater London, responsible for delivering the commitments in the Mayor's Transport Strategy and London Plan. TfL runs most of London's public transport network and manages London's main roads, known as the Transport for London Road Network (TLRN). The A127 immediately west of M25 Junction 29, including the eastbound exit and westbound entry slip roads of the A127, is part of the TLRN and falls within the scope of works of the Lower Thames Crossing (the Project). Several other roads within London that are forecast to be affected by changes in traffic patterns caused by the Project are also part of the TLRN.
- 1.2 This Relevant Representation seeks to assist the Examining Authority (ExA) in undertaking its initial assessment of the principal issues for examination.

2. Summary of TfL's position

- 2.1 TfL is supportive of the Project in principle, subject to being satisfied that it will not result in an increase in the overall number of car trips in London, and subject to any adverse impacts on the road network and the environment being adequately mitigated. However, TfL has two principal areas of concern with the Project which it is seeking for the Applicant to address and which we invite the ExA to consider during the examination of the DCO.
- 2.2 The most significant concern for TfL is **the lack of any mechanism being put forward to mitigate adverse impacts resulting from the Project, whether wider traffic network or environmental impacts**. This is a significant risk to the smooth and safe operation of, and the air quality and noise levels generated by, the TLRN and other roads in London. The Applicant is entirely relying on demand forecasting and modelling undertaken in the early 2020s using a pre-pandemic baseline for a scheme not due to open until 2030. Such an approach singularly underestimates the uncertainty inherent in a scheme of this scale so far in the future. This is exacerbated by the fact that significant concerns exist about the robustness of the modelling in London undertaken by the Applicant, which further draws into question its reliability for forecasting traffic, air quality and noise impacts and therefore the mitigation required. These concerns are summarised in **Section 3** of this representation.
- 2.3 The other area where TfL has concerns is associated with **the direct impact on TfL's assets and operations on the A127 west of M25 Junction 29** and TfL's role in the design and delivery of the Project for the section that affects the TLRN. The Applicant's approach needs to be agreed with TfL to ensure that TfL's interests as a highway authority and landowner are protected, including in relation to new infrastructure to be delivered and transferred to TfL as part of the Project. This is covered in **Section 4**.

3. Assessment and mitigation of adverse impacts

- 3.1 The Project adds a large amount of capacity to the road network. As a result, the traffic modelling undertaken for the Project by the Applicant shows that major changes to traffic

patterns are forecast over a wide swathe of southeast England, including parts of east London.

- 3.2 For a highway scheme of this scale there is inevitably a degree of uncertainty about the pattern of future traffic flows caused by the Project, which no modelling undertaken 7+ years beforehand, however robust, could fully anticipate. As such, TfL's principal concern is that the Wider Network Impacts Monitoring and Management Plan fails to set out any credible mechanism for mitigating adverse impacts identified through monitoring during the operational phase of the Project. The risk is that impacts on the wider highway network – as well as air quality and noise impacts – which arise as a direct result of the Project, will not be addressed. These concerns are exacerbated by deficiencies identified in the Applicant's modelling of the Project.
- 3.3 The modelling undertaken by the Applicant shows that, for London as a whole, there is a slight reduction in traffic due to capacity at the Dartford Crossing being freed up, allowing some trips within London to divert to a faster route on the M25/A282. However, the modelling forecasts increased traffic on specific sections of the TLRN. The greatest impacts for the TLRN are on the A127 west of M25 Junction 29, where TfL's analysis of the Applicant's modelling shows increases in traffic flow in each direction as high as 700 Passenger Car Units in the morning peak hour as soon as the Project opens in 2030. Significant increases in traffic also occur on other parts of the TLRN, namely the A13, A2 and A20.
- 3.4 Increases in traffic of this scale may result in significant changes to delays at junctions. TfL has identified junctions of potential concern, notably along the A127 – with the M25 at Junction 29, with the A12 at Gallows Corner, and the intermediate junction with Squirrels Heath Road and Ardleigh Green Road. TfL requests the ExA seeks to understand safety concerns, impacts on pedestrians and cyclists, and impacts on journey times for the bus network resulting from the Project.
- 3.5 However, the Applicant's modelling which TfL is being asked to rely on includes an important shortcoming. The model zoning has been aggregated within London, resulting in short distance local trips being omitted from the model, and congestion therefore being underestimated at key junctions – an issue that the Applicant acknowledges – including for areas in close proximity to the Project. This further undermines confidence in the ability of the model to serve as the only basis for determining the need for mitigation in 7+ years' time.
- 3.6 TfL considers that there are potential approaches to joint working between the Applicant and affected highway authorities on mitigation that monitoring shows to be necessary, building on approaches adopted for other nationally significant infrastructure projects such as the Silvertown Tunnel. TfL invites the ExA to consider such approaches during the examination.
- 3.7 TfL also has concerns with regards to the environmental impacts of the Project. While analysis in the Environmental Statement shows that air quality levels, despite worsening for some receptors in London, remain within legal limits, the modelled NO₂ levels are well above World Health Organisation guidelines which Mayoral policy is seeking to move towards. We note the assessment of PM_{2.5} particles has been calculated as a proportion of modelled PM₁₀ and we invite the ExA to consider the robustness of this approach.
- 3.8 Ultimately, the uncertainties and concerns associated with the traffic modelling are similarly relevant for air quality and make it essential that an ongoing monitoring and

mitigation strategy is in place to ensure that any adverse air pollution impacts that arise are adequately addressed.

- 3.9 TfL also notes the exclusion of ‘user carbon’ – i.e. the impacts of changes in traffic flows – from the scope of the carbon quantification and management approach reported in the Carbon and Energy Management Plan. The management plan therefore omits what is likely to be the greatest carbon contribution of the Project and misses the opportunity to undertake a thorough investigation into whether and how the Project will reduce all related carbon. Chapter 15 of the Environmental Statement acknowledges that there will be an increase in carbon emissions as a result of the Project. TfL invites the ExA to consider the fit of the carbon impacts of the Project with London and UK carbon policy, whether the Project aligns with the strategic priorities of the Transport Decarbonisation Plan, and whether any additional mitigation is required.

4. Impacts of the Project on TfL assets and land

- 4.1 The key impacts on TfL assets and land are associated with the A127 west of M25 Junction 29. A new walking, cycling and horse-riding (WCH) bridge over the A127 is planned as part of the Project along with a new dedicated route between the northbound M25 and A127 westbound on slip avoiding the roundabout at the junction.
- 4.2 TfL understands the need for the provision of a WCH bridge at the proposed location. This requirement arises from changes to the Applicant’s strategic road network resulting in severance at M25 Junction 29 and elsewhere that the Applicant is proposing to address by constructing a new bridge that will be operated and maintained, not by the Applicant, but by TfL. TfL will need to be closely involved in the design of the bridge to ensure it facilitates efficient maintenance and the personal safety of users. TfL considers that the land acquisition proposed for the bridge is broadly appropriate though, in the absence of a detailed design, the Applicant needs to provide assurance that it will be sufficient for construction and maintenance regardless of the final design. The draft DCO needs to be amended to ensure the Applicant has the necessary powers for the onward transfer of land and rights to TfL to operate and maintain the bridge. Other amendments to both the draft DCO and plans for acquisition of land and rights are required at M25 Junction 29. If insufficient progress with the Applicant has been made in advance, these issues may need to be considered during the examination.
- 4.3 TfL will need protective provisions, or alternative equivalent assurance, to be in place regarding work the Applicant will undertake that directly affects the TLRN. This includes approval of design for changes made to the TLRN, arrangements for accepting and bringing into use new or changed assets, and agreeing operating arrangements between the Applicant, TfL, and respective contractors in order to manage construction impacts.
- 4.4 TfL will incur substantial additional costs associated with the operation and maintenance of the new WCH bridge over the A127 so will also require a commuted sum and TfL’s costs to be covered associated with this and other works to the TLRN. The Applicant has not provided TfL with its position on this so in the absence of other arrangements being agreed, TfL considers that protective provisions will be required in the DCO.
- 4.5 TfL also notes the construction impacts associated with works to the TLRN on the A127 set out in the Environmental Statement, including adverse noise impacts on nearby receptors. TfL expects any works on the TLRN to comply with Mayoral policies and that the Applicant will strive to deliver the works in the most efficient manner to limit their impact. The loss of trees alongside the A127 that are part of TfL’s green estate is also noted. TfL expects woodland planting replacing this to provide an adequate level of mitigation and be

appropriate given the proximity to diverted utilities. TfL needs to be consulted on the Noise and Vibration Management Plan and other environmental management plans for works affecting the TLRN. TfL also wishes to be consulted on the discharge of requirements that are relevant to TfL's role as highway authority.

5. Conclusion

- 5.1 TfL requests that the ExA considers the points raised in this representation and investigates these during the DCO examination process. TfL will welcome the opportunity to expand on these points through written representations and at appropriate hearings.