
I wish to raise issues with Junction 25 of the M25. You may be aware that the junction is presently being upgraded to provide a dedicated left hand turn on and off the M25 from the Hertfordshire side.

The option to provide Enfield a dedicated left hand turn onto the M25, which would help clear the junction, reducing idling and air pollution substantially. With us having a three lane approach and with the slip-road having enough room for two lanes no land grab is required. Enfield Council should as part of the local plan get costs for implementing this and make it a s.106 / CIL project to be implemented once a critical mass of new housing has been delivered. This would also help reduce delays on the 317 and 217 buses.

Please find below a formal complaint I issued to DfT for refusing to implement this despite TfL seeking discussions on it. With tens of thousands of new homes planned in Enfield and Haringey the A10 will become a toxic car-park without this enhancement.

Please confirm that this observation is submitted formally to the Local Plan review.

Yours sincerely,

Dear Transport Secretary, Ministers and Under Secretaries

RE: FORMAL COMPLAINT regarding a failure to co-operate with TfL to discuss in more detail Option 3 for the M25, Junction 25 improvements

Summary: £30m was allocated by George Osborne's Treasury to upgrade Junction 25 of the M25, to resolve chronic congestion and because this is the junction that serves the Crossrail 2 corridor for the Upper Lea Valley comprising the Broxbourne Branch of Crossrail 2 that is supposed to deliver tens of thousands of new homes.

However, Option 3 that would have delivered additional capacity for London was ditched because it was just £2m over budget, well within the margin for error. TfL asked for further discussions on it but there is no evidence of engagement. Instead, Option 2 was chosen, which results in almost £100m less economic benefit. Londoners will have to suffer years of disruption and yet the works will not deliver substantial benefit to Londoners. Meanwhile, the junction will get busier as more and more homes are built along the Lea Valley, in Edmonton and Tottenham and an increasing amount of commercial traffic uses the A10 corridor to reach the City of London.

The complaint focuses on there being no evidence that Highways England co-operated with TfL at all on this matter despite their formal request and clear interest in the matter as a stakeholder.

<https://highwaysengland.co.uk/projects/m25-junction-25-improvements/>

[Technical appraisal report](#)

Detailed complaint:

The Highways Agency has set out options for improvements to Junction 25 of the M25 and opted for Option 2 without consulting on Option 3.

Option 2 is the preferred option. It provides substantial benefits for Hertfordshire and not London, by delivering dedicated left hand turns for traffic to and from Hertfordshire. Only Option 3 provides material benefit to London, by providing a dedicated left turn onto the M25 for northbound A10 traffic from London, plus enhanced capacity for southbound traffic heading into London from the M25 and Hertfordshire. The dedicated left hand turn, in particular, would help relieve pollution and congestion, particularly for Bullsmoor Lane in Enfield, which serves London's second largest industrial estate at Brimsdown as well as Innova Park Industrial Estate along with the Crossrail 2 corridor, which is expected to deliver tens of thousands of homes in Mayoral Housing Zones, with over 100,000 people expected to move into Enfield by the 2030s, yet there is no capacity for this M25 junction and these enhancements provide minimal relief.

Option 3 is slightly over budget, at £32m vs the allocated budget of £30m. The technical report, attached, states that Option 3 performs slightly better than the preferred Option 2 across all performance indicators and is the best performing across all options. It processes a higher number of vehicles across most of the network and is the best performing scenario for journey times along most routes, generally improving journey times compared to the Base Year despite increased vehicle throughput.

Furthermore, Option 3 would yield £424m in economic benefits vs the £340m for the preferred Option 2. In light of the fact that Option 3 principally benefits London, one would expect that the majority of the additional £84m of economic benefit would accrue to London, and principally deprived parts of north east Enfield, that form the Upper Lea Valley Opportunity Area and Crossrail 2 corridor that is expected to deliver the vast majority of new homes for north east London, with a substantial number of London's Mayoral Housing Zones. Option 3 was not considered despite it having an impressive Benefit Cost Ratio of 13.2. DfT consider that any project with a BCR above 4 has a very high value for money. This project is off the charts in terms of the business case.

The complaint relates primarily to there being no evidence that Highways England made any attempt to respond positively and proactively to TfL's request to "discuss option 3 in more detail", which came in writing from TfL's Chief Engineer, Mr Eddleston, contained within his response to the consultation, which is attached to this email along with the Option 3 design. My FOI on the matter elicited no further correspondence. Options for discussion could have included TfL delivering the cycle elements of the project to free Highways England money to fund Option 3, the Mayor may have been in a position to provide grant money, Mayoral Housing Zone money could have been made available in the form of seed money or developer contributions, in light of the tens of thousands of homes planned in the Upper Lea Valley, the Mayor may have been able to work with DfT and Enfield to provide more money. TfL may have been able to assist a re-design that satisfied London's needs but within the £30m budget.

There is still time to re-evaluate M25, J25 enhancements to re-consider Option 3 or a new option that combines Option 2 and 3. Without it, it is possible that London will not be able to deliver the housing that is required.

Yours sincerely,

On 2 Aug 2021, at 17:20, LocalPlan <LocalPlan@Enfield.gov.uk> wrote:

Dear consultee,

I am writing to update you on developments since I contacted you about the draft Enfield Local Plan consultation in late June 2021.

Drop-in events

Details of the consultation drop-in events are set out below. Officers will be present at the events to answer questions and help you find out more about the draft Enfield Local Plan and share your views. The events will be taking place at:

- Palmers Green Library on Tuesday 17 August, 10am–12pm and 5–7pm.
- Edmonton Green Centre (as part of the 'Month of Sundays' event) on Sunday 22 August, 1-5pm.
- Ordnance Unity Centre Library on Thursday 26 August, 10am–12pm and 5-7pm.

New information on the Local Plan website

Since consultation opened on 21st June, we have added a small amount of new material to the Local Plan website <https://www.enfield.gov.uk/enfieldlocalplan>:

- An errata note which corrects several omissions and typographic errors in the draft Local Plan. This can be viewed here: <https://new.enfield.gov.uk/services/planning/errata-to-the-enfield-local-plan-issues-and-preferred-approaches-planning.pdf>
- Updates to the evidence page which include:
 - Housing and Economic Land Availability Assessment, appendices and raw data
 - Level 2 Strategic Flood Ri