

**Matter 13: Transport**

This Statement considers:

- Increasing congestion and effects on Epping Forest SAC
- HQPT and ST in general
- Opportunity to link North Weald and Ongar to other main settlements by HQPT
- Safeguarding the EOR Line
- Linking Latton Priory and Harlow to Epping
- Alternative sustainable locations for development and National Green Belt policy
- Underground and mainline rail, plus Underground station car parking

Increasing congestion and effects

It is clear from evidence given to the Inquiry (Hearing 25/2/19) that congestion will get worse under the Plan: traffic congestion will worsen with shouldering/peak spreading: existing or greater congestion in peak hours and also greater congestion in hours surrounding those peaks.

Also it is apparent that the Epping Forest SAC will be harmed by the Plan: directly through proposed highway works to increase junction capacities (EB503); and indirectly through pollution from extra traffic arising from the Plan, in addition to what will increase without it.

There is a Memorandum of Understanding which claims to deal with this, but it omits any concrete or realisable actions that would/could be taken to solve the issue. E.g. one action within the signatories' powers might be to halt new planning permissions, but this would undermine a key objective of the Plan to substantially increase housing provision. Subsidising new public transport/bus services, even if free, may not be enough to change travel behaviour. High Quality Public Transport (HQPT), high enough to be attractive, isn't in the Plan and it is not an easy add-on afterwards.

EFDC's Epping Forest Special Area of Conservation (SAC) – Interim Position Statement July 2018 (in Appendix A attached, downloaded recently from the EFDC Forward Planning website) identified two specific issues with a likely significant effect on the SAC; the second being “The result of damage to the health of the flora, including trees and potentially the heathland habitats, from air pollution generated by vehicles.”. It says “the potential impacts from air pollution applies to **developments of all types in all locations** within the District. Therefore in this interim period all residential and employment proposals within Epping Forest District will likely have an air pollution impact on Epping Forest SAC.” [my emphases].

In general: High Quality Public Transport (HQPT) and Sustainable Transport (ST) in the district

Buckhurst Hill, Loughton, Debden, Theydon Bois, and Epping are all linked by the Central Line to each other and to London; while North Weald and Ongar also used to be. Roydon has its own rail

station (and is close to Harlow), and Lower Sheering (adjacent to Sawbridgeworth) has that railway station on its boundary. Harlow is set to expand with land allocations and a proposed Public Transport (PT) network, as far east as Sheering (also to expand). However, the westernmost part of Waltham Abbey town centre is some 1.4km from the nearest rail station, a route partly dual-carriageway. Lower Nazeing is also some distance from the nearest railway station.

Trips between settlements within the district and to Harlow which are not served by the Central Line, need to be by vehicle (usually private cars) or by bus, where available; rather than HQPT. The nature of roads and lack of decent footways outside settlements deters cycling and any walking.

High Quality Public Transport (and what transport professionals call High Quality PT may not be the view of Tube passengers) is an attractive alternative to using the private car in a way that buses are not. Buses are seen here (compared to major urban areas) as used by the young, old and others who cannot drive: a necessity rather than a choice, and public funding support for buses by ECC has declined.

It is apparent that linking North Weald and Ongar to Epping by HQPT, and thence to Loughton/Debden/ Theydon Bois/Buckhurst Hill (and London) by Underground, is the best way to achieve more sustainable transport links in the district (outside H&GGT).

Problems still remain for linking Harlow and Latton Priory to the Central Line, as below.

Also there is a problem of no HQPT link between main settlements in the District and Waltham Abbey, with its large employment land allocation; particularly as getting to Waltham Abbey from the main population centres in the District and most larger settlements by road (whatever the vehicle) means travelling through Epping Forest SAC.

Whatever ST options across district have been looked at, none appear in the Plan (apart from within H&GGT, and walking and cycling within settlements -but set against this see objections regarding lack of jobs:workers balance).

Even if commuting can be by relatively sustainable means (like bus or rail), that is still not as sustainable as reducing the need to travel; an aim of Government planning/sustainability policy.

The Plan makes numerous references to sustainable transport. E.g. policy T1B. states “Development should minimise the need to travel” and “promote opportunities for sustainable transport modes”. Much mention has been made at Matter 4 & 8 Inquiry Hearings to these aspirations and to Active Travel; to getting ST into peoples’ habits in new land allocations at H&GGT; and to “modal shift. But there is a lack of anything significant proposed in the Plan to make a major impact on unsustainable transport use between settlements, set to increase from both natural growth and new Plan allocations. So the Plan isn’t doing much, although there is a requirement for large sites to have a Transport Assessment.

The Plan mentions “managing” traffic growth, not ‘minimising’ it. Land allocations, both in terms of locations and uses will make matters worse than needs be.

Opportunity to link North Weald and Ongar to other main settlements by HQPT

It is worth repeating that linking North Weald and Ongar to Epping by HQPT, and thence to Loughton/Debden/ Theydon Bois/Buckhurst Hill (and London) by Underground, is the best way to achieve more sustainable transport links in the district (outside H&GGT). This was the case until the Epping-Ongar extension to the Underground was closed and it became the Epping-Ongar Railway (EOR), a part-time leisure line.

The Plan makes one of two major employment land allocations at North Weald, together with substantial housing allocations at both North Weald and Ongar. It is not apparent whether or not there will be a jobs:workers balance at North Weald -even from the plan allocations on their own. From discussions at the Hearing on 21/3/19 it would appear that EFDC doesn't know what the balance or imbalance is (outside H&GGT). Certainly, the Plan makes a major housing allocation at Epping without an accompanying increase in employment (whether through 'B'Class uses or retail employment etc.); instead removing existing employment land.

The ability to travel between these three settlements sustainably, as well as other settlements served by the Central Line within the district and beyond, is important and a major component of travel routes in the district.

We know in-house early study work has been undertaken by EFDC about the potential of the Epping-Ongar Railway (EOR) Line, although this work hasn't been published and thus cannot be interrogated. Initial constraints stated by EFDC are: limited passing places on the line; it passing through a SSSI; and the line being in private ownership.

However:

- there are passing places (plenty of space at the Epping end, the passing loop at North Weald has been reinstated with the passing loop reinstatement at Ongar planned (as at July 2013);
- London Underground managed to run a full, then peak hours only service, without a shortage of passing places every 20 minutes, the restriction to only 20 minutes (and to short trains) was due to the line's electrification being done 'on the cheap' (as the Line runs non-electric trains now, these restrictions shouldn't apply);
- While privately owned, income from running say peak hour services between Ongar and Epping should help with projects beyond volunteers and normal fundraising (EOR has major projects in mind, including linking through to new platforms, just beyond Epping Station platforms). The Plan states (para.2.79) a willingness to use CPO powers as part of a "positive approach". Any CPO for the EOR Line which might be required could be limited to rights over the line at certain times, not full ownership; and the leisure railway operates between 10:10am and 16:30pm; and
- The rail route through the SSSI is relatively short compared to the length of roads that pass through (Epping-North Weald) of beside (Epping-Harlow and Harlow-North Weald), and rail transport should emit less pollution than road transport (less friction).

Some published information on the EOR Line is included in Appendix B, including adaptations already made to help through shuttle services.

EFDC have told me (20/2/19) that a bus service might be an alternative to use of the EOR Line. But this wouldn't be the HQPT alternative to cars that would encourage people to switch. (There used to

be a London Transport 339 bus service running alongside the Ongar Underground extension, serving Epping, North Weald and Ongar as well as smaller places). Since closure of the Underground extension, passenger growth has increased substantially as shown by increased service frequencies along the Central Line. Population and commuting from North Weald, Ongar and surrounding areas will also have increased. We know that people who used to use the line have to drive by car to Epping Station and park in residential areas and town centre car parks with the Underground Car Park being full by about 6.45am.

### Safeguarding

In the absence of the Plan reinstating a HQPT route between Epping, North Weald Bassett and Ongar using the EOR Line (or some other); it makes sense to safeguard the EOR Line for this purpose: adding it to the T2 Safeguarding policy.

Given the MoU (as above) and likely future plans to combat climate change: Government plans for zero carbon by 2050 are expected in a few months; plus there it is increasingly recognised that we have only 12 years to halt climate change, with climate disaster groups saying massive changes are needed by 2025; it is prudent to safeguard a route that would have substantial benefits. The Plan is required to anticipate changes in e.g. housing delivery rates over the Plan Period: the whole concept of safeguarding shows similar flexibility and forward planning.

The Epping-Ongar line (EOR) is currently subject to a safeguarding policy, through the LP Alterations (which changed and brought forward those previously in the Local Plan).

Use of the EOR Line for HQPT could be just peak hours only on weekdays, when most commuters would use it: leisure use of the line is between 10:10am and 16:30pm so the two uses could easily co-exist.

### Linking Latton Priory and Harlow to Epping

A comprehensive package of sustainable transport (ST) measures is being proposed for sites comprising the Harlow and Gilston Garden Towns (H&GGT) area.

However, there are concerns about the practicality, and viability of linking H&GGT -and Latton Priory at the southern end of the proposed north-south public transport (PT) route in particular- to Epping Underground Station. These are set out in part 2.) of my Matter 14 Hearing Statement on Infrastructure and Delivery.

Church Langley provides an example of the detachment from Harlow urban area that is likely to be far worse for Latton Priory: as the latter is proposed to include a direct “indicative access road” (shown on Plan page 39) ending close to M11 Junction 7. The percentage of Church Langley workers who work in Harlow is 28.5%, the proportion from the rest of the town who work within it is 45.3%.

Developers will want the “indicative access road” as it will make selling houses easy to a M11 and M25 market catchment. But this will add cost, potentially making the north-south public transport

link within Harlow less achievable in terms of development contributions viability. The access road will provide easy access to the B1393 and thence to Epping Underground (some 3.6 miles/6 minutes).

Should a bus service ever be extended to Epping Tube (given reservations about links from Latton Priory to Epping, and it is not a Plan requirement); then routeing it via Southern Way , rather than the indicative access, would better serve southern Harlow.

#### Alternative sustainable locations for development

There are sustainable alternative locations, like Theydon Bois (identified in the SA as a possible location for a larger amount of development). Directly east of the Underground Station there are clearly few constraints, as shown in the reasons for non-selection of this large potential land area: SANGS would be required and are quite possible, indeed a benefit, to such an allocation

This location performs well regarding NPPF Green Belt policy; as does Hunsdon Airfield:

- “local planning authorities should take account of the need to promote sustainable patterns of development.” (previous NPPF84); and
- “plans should give first consideration to land... well served by public transport.” (new NPPF138).

Hunsdon Airfield is a sustainable location, compared to Latton Priory (SP5.1) in relation to both of Harlow’s railway stations, and the public transit routes that will serve other (approved) adjacent development areas at Gilston as part of H&GGT. The Gilston Park Estate website shows that out of the total area: 55% is developable land (not including constrained land); but only 34% of land is being developed, in 7 villages with 66% landscaped area. Hunsdon Airfield is a large area near Village 4 not being developed.

Elsewhere in hearing statements I have considered the lack of a jobs:workers balance within settlements; the many benefits of achieving this e.g. in terms of Active Travel etc; and the transport, congestion and pollution disbenefits of not so doing.

#### Underground and mainline rail plus Underground station car parking

The Plan recognises of commuter driving from distant parts of the district to use Central Line services as they are cheaper than the mainline rail services available just outside the district boundary (2 stations) and at Harlow (2 stations). The Plan says that the planning system cannot do anything about this, but it can as below (differential pricing).

It can be expected that, even with more of a jobs:workers balance (which needs improving, as referred to in other statements) additional housing required to meet OAN will generate additional commuting on the Central Line. As there will be more land available at Epping EPP.R3 (with the inclusion of the building supplies site) more parking than the current 534 spaces should be provided to meet additional needs in the Plan period and the Plan should require this as part of development

of the site. More parking capacity at Epping should lead to those commuters who have had trouble finding a parking space, and thus tempted to make their journey by car instead, to be more inclined to use public transport and reduce vehicle emissions – especially as many commuting journeys will be through Epping Forest Special Area of Conservation (SAC) which is being harmed by vehicle pollution.

It is all very well for the Plan to mention contributions to CPZs and these help local residents affected by overflow parking arising from a shortage of spaces. But that doesn't help those who need to park and commute; they get pushed further away from an Underground Station by CPZs, having to walk further (while potentially annoying residents further away) with longer journey times. The further away they get pushed, the more likely they will use their car exclusively for their journey. Instead of displacing the commuter parking problem from one area to the next it should be tackled while there is an opportunity in a positively prepared Plan that looks ahead to 2033!

An increase in parking capacity can be gained in a way other than just creating more parking at Epping Station, as follows (both methods should be used in combination).

Differential parking pricing should be a requirement of the development of EPP.R5, LOU.R1 and LOU.R2. For example a standard rate for postcodes near to these stations to encourage local use as an alternative to the car and for new residents of homes allocated in these towns; and a higher rate for commuters from postcode areas near to mainline stations and further afield. The differential pricing would reflect the difference in rail travel costs of Underground compared to Overground services. The technology is available, e.g. Automatic Number Plate Recognition (ANPR) is being rolled-out to 28 Underground stations in one year and vehicle number plates tie to postcodes of addresses where they are kept (as with CPZs). EFDLP background documents refer to ongoing discussion with the mainline rail operator about the fares differential, although the Transport Assessment Report (TAR) 2019 only mentions flexible fare tariffs. While I understand that TfL now operates the West Anglia Mainline, financial constraints may be expected to prevent fare equalisation. So, to make sure the issue is dealt with, differential car parking pricing would discourage car journeys (with attendant pollution and congestion, e.g. in Epping High Street) through the district: from residences near to Roydon and Lower Sheering stations; from existing Harlow residents and H&GGT; and from future occupiers of the Latton Priory land allocation; to Epping.

Church Langley, Harlow, given an idea of Underground and mainline rail use from areas around Harlow: 5.5% of workers from there travel by Underground etc. (272 workers and probably a similar number of cars seeking parking), whereas 6.3% (308 workers) use the Train. Residents of Latton Priory are far more likely to use the Underground than the train, as explained above.

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The Voluntary Strategic Environmental Assessment of the Local Plan Alterations Redeposit 2005 identified traffic generated air pollution close to critical levels in Epping, Chigwell and Loughton town centres and by the M25 at Waltham Abbey. I haven't managed to find updated figures yet.

## **APPENDICES (A) and (B)**

Epping Forest District Local Plan (Submission Version): Hearing Statement 4 - Henry Stamp 23/4/19

### **Matter 13 Transport**

## **APPENDIX ( A)**

### **Epping Forest Special Area of Conservation (SAC) – Interim Position Statement July 2018**

What is the Epping Forest Special Area of Conservation (SAC)?

This note has been produced to provide an overview of the current planning context in relation to Epping Forest Special Area of Conservation (SAC), and implications for the determination of planning applications at the current time.

Epping Forest covers a large area of land within the District and much of the Forest is designated as a Special Area of Conservation (SAC). Biodiversity features within, or associated with, these designations enjoy a high level of protection under UK and EU Law and UK planning policy. Epping Forest SAC is considered a 'European Site' and as such an assessment, known as a Habitats Regulation Assessment (HRA), is required for any development plan or proposal to ascertain whether it will have a likely significant effect on the site.

What is the Council's role with regards to the SAC?

The Council has a duty as the 'competent authority' under the Habitats Regulations to protect the Epping Forest SAC from the effects of development (both individually and cumulatively). Two specific issues in particular have been identified that could have a likely significant effect on Epping Forest SAC. These being

The result of increased visitors to the Forest arising from new development.

The result of damage to the health of the flora, including trees and potentially the heathland habitats, from air pollution generated by vehicles.

As part of the work required to produce the Mitigation Strategy, a visitor survey was undertaken to identify a recreational zone of influence and to identify the distance the majority of visitors will travel to visit Epping Forest SAC. This report identified that 75% of visitors traveled up to 6.2km to the SAC. Therefore in this interim period a zone of influence of 6.2km is being used to determine whether residential applications will have a recreational impact on Epping Forest SAC.

Unlike the findings of the visitor survey the potential impacts from air pollution applies to developments of all types in all locations within the District. Therefore in this interim period all residential and employment proposals within Epping Forest District will likely have an air pollution impact on Epping Forest SAC.

How are the Council addressing these impacts?

The Council is currently liaising with Natural England and the Conservators of Epping Forest and other authorities affected in order to agree a Mitigation Strategy to mitigate the above effects. The measures required have not yet been established but need to be agreed and in place prior to the determination of relevant planning applications.

The Council and partner organisations continue to make good progress in the production of the Joint Strategy, however in the meantime there are implications for the determination of planning applications in the District.

What are the implications of the SAC at the current time?

Due to the above, at the current time the Council cannot grant planning permission on any planning applications resulting in additional residential development which are within 6.2km of Epping Forest SAC and all proposals that result in additional residential and/or employment development within the entire District likely to have an air pollution impact on Epping Forest SAC (when considered alone and in combination with other plans/projects), until such a time that an appropriate financial contribution to mitigate against the adverse impact that it will have on the Epping Forest SAC has been agreed.

Are there any exceptions to the above?

The only exceptions to the above are

For developments outside of the 6.2km zone of influence (i.e. where there is no risk of recreational pressure) and where an Air Quality Assessment has been submitted providing full justification that the development will not result in any increase in air pollution or that the impacts from air pollution would be adequately mitigated. All submitted information would need to be agreed by Natural England prior to determining an application.

For any developments whereby the applicants have agreed to enter into a legal agreement to pay a financial contribution towards appropriate mitigation measures. At the current time the monetary figure has not yet been determined and therefore the Council can only resolve to grant planning permission subject to a legal agreement. It will not be possible to finalise the legal agreement or issue a decision notice until the mitigation strategy and the financial contributions required have been agreed.

What are the next steps?

The Council recognises the need to significantly boost the supply of housing in the District, and recognises the potential difficulties posed by this matter. However the Council must carefully consider the Habitat Regulations in its role as competent authority in determining planning applications.

The Council and partner organisations continue to work proactively to progress the production of a Joint Strategy and to facilitate the delivery of housing in accordance with the emerging Local Plan, and once the Joint Mitigation Strategy is agreed it will be put in place as soon as possible.



## **APPENDIX (B)**

### Some of published information on the Epping-Ongar Railway

"The decline in train passengers was used as an excuse to remove the passing loop at North Weald as an economy measure, thus only one train could shuttle between Epping and Ongar, giving a maximum service of every 40-48 minutes even in the peak periods, approximately half that which previously operated. This led to even more people using alternative transport as, unless they managed to catch the right train from London to connect, they could have a long wait at Epping for a cold train forward. It was soon time for the service to be reduced to peak hours only, with LT claiming that at other times there was the 339 bus! There was a brief period when trains were restored between the peaks but by then enough passengers had found alternative transport so it did not last long." (from [www.abandonedstations.org.uk](http://www.abandonedstations.org.uk))

With transfer of the branch to London Transport in 1949, steam services continued to shuttle between Epping and Ongar until 1957. A 20-minute interval service required a passing loop at North Weald where a second platform was constructed. Trains also needed to pass at Ongar where there was only one platform. This was achieved by the departing train waiting at the western end of the long platform whilst the arriving train passed it on the run-around road and then crossed over behind it to the eastern end of the same platform. These trains were usually operated by Holden F5 engines fitted for push-pull working, and a group has been formed to build a working replica. Branch electrification was finally commissioned in November 1957 with a single-end feed from Epping substation to keep costs down. This limited available train power, and was the reason for the shuttle service of short trains rather than working through trains to London. In addition to new track and points, new signalling systems have been installed at both North Weald and Ongar to permit operational flexibility and a higher frequency service. There are now bay platforms at North Weald and planned for Ongar, The North Weald signal cabin includes a king lever to minimise future staffing when using a diesel shuttle and if a through shuttle service is ever operated. (from <http://www.lurs.org.uk> extracts from Simon Hanney, EOR General Manager 9/7/13).