EGDC Local Plan Hearing – Matter 13 – Transport

Evidence by John Manning Ref : 19RESO750

Introduction

I am a local resident and a Chartered Civil Engineer. I have made a written representation; this presentation supplements that evidence and makes detailed observation on documents which have been presented since the EFDC deadline.

I have previously given evidence at an Inquiry, in 1976, into the proposals for M25 in the Epping area. My intervention resulted in major changes to the interchanges as now built which have a bearing on the current traffic in the Epping area. Principally the non- construction of north facing slip roads at M11 Junction 5 has resulted in heavy traffic on B1393 , Epping High Road ; the concept of the M11 being an Epping bypass has not materialised. The letter from the Departments of the Environment and Transport dated 28 September 1977, as directed by the Secretaries of State and following the Inspector's Findings of Facts, Conclusions and Recommendations, states " the construction of the Bell Common Interchange should not be authorised until there has been a full detailed examination of the merits of the alternative strategy, including any possible traffic management measures designed to ease the burden on residential streets in Loughton". This examination has never been conducted and I suggest that it is within the remit of this enquiry to request that such a study is now appropriate. The document referred to above also states "north-facing slip roads to the M11 interchange with A1168 at Loughton, which would give greater relief to Epping Town and the A11 through the Forest than the Bell Common Interchange". (A copy of the relevant part of the document dated 28 September referenced above will be appended in hard copy. An electronic copy is not available from library sources.)

The documents on which I wish to make detailed observation at this Inquiry are EB 503 Transport Assessment Report and EB 209 Habitat Regulations.

As a local resident and professional Engineer I am mindful of the significant and unique restraints in the Epping area viz. the proximity to London, the land availability constrained by the Forest and Green Belt, and the high cost of housing.

Current Local Traffic and Transportation provision

All of the reports emphasise that much of the system and provision are working at or nearing capacity, particularly roundabout and signal controlled junctions. I would be happy to give detailed comment on the analysis of junction capacity as reported in Section of EB 503 , but will restrict my contribution to major points which I wish to query. It is assessed that the Local Plan will increase traffic in Epping by 17% in 2033. Proposals are made to mitigate the impact of this by the introduction of sustainable transport , (scenario 3) , and as an extension of this, some highway improvements (scenario 4). The analysis is extensive and complex and runs to 162 pages.

Figure 3-2 – Noted that Station Bower Hill/Station Approach is not in model so local impact of proposed Epping South not tested. J16 and J17 to north of town are identified.

Table 4-2 – Small proportion of existing bicycle users and walkers noted

4.3.2 – Congestion on A414 between Epping and Ongar not identified. Congestion on A113 on in Ongar not identified.

4.4.3- The study identifies that 350-450 injury collisions occur on roads across the District of which one fifth are on trunk roads. This analysis agrees with figures reported by Essex police that between January 1 and September 11 there were64 collisions between Junction5 and Junction 9 on M11. It is reported that 'this stretch of M11 is becoming more dangerous" (Reference- Highways Industry.com-Copy attached). Figures for M25 section between Junction 26 (Waltham Abbey A121)) and Junction 28 (Brook Street A12) may also be relevant as routes through Epping and Ongar are used as a way round blocks. The figures indicate that an incident causing drivers to divert onto the local network occurs at least once each week and particularly at peak hours. The model has not identified this connectivity which should be investigated further.

4.5 Air Quality has been measured at Bell Common and further monitoring is reported in EB 209. Since the report acknowledges that air quality issues in urban areas are principally caused by stop/start traffic congestion, (and I would add up gradient), it is surprising that there is not a monitoring station at the Council offices and at the B1393/B181 Junction, (a part of the forest and also a hospital site). My personal experience of Epping High Road is that pollution levels as NOx is high, particularly on hot still days.

4.6.1 The Report acknowledges the problem of connectivity of local public transport between "small towns",i.e. Epping, North Weald and Ongar and the surrounding areas. This is particularly evident in connectivity to Epping LUL Station. The Report does not identify the usage of bus passes by elderly people which, in my experience is a significant proportion, which must affect commercial viability.

4.6.12 The high proportion of journeys to work made by LUL is evident to all locals using Epping Station, as is the evident collection of travellers from wider areas. This accounts for the fact that Epping Station Car park is full by 7.30am and that there is pressure on surrounding areas to fulfil commuter parking demand. This can be seen in the peaking figures in Tables 4-5 and 4-6. There is no doubt that a large proportion of the occupants of the proposed new housing developments will seek work in London and be users of LUL services. This is particularly true of prospective owners in Epping South (950 homes) where economics of housing and work will prevail.

4.6.16 The statement that LUL provides 'a sustainable transport solution to support lower parking/zero car dependency " is questionable as the large number of delivery and collection trips by car is unlikely to diminish.

4.7 As a user of an electric bicycle I can endorse the view that the cycling provision in the area, Epping, North Weald, Ongar and the surrounding areas, is abysmally low and that usage is discouraged by the danger of heavily trafficed routes and narrow roads. This is a feature of the area with many of the restraints imposed by City of London administered Forest land.

4.7.6 The Epping Forest District Cycle Action Plan is not a document identified in the submission other than at this section. Greater emphasis should be given to this.

4.7.11 “There is potential to provide links across the town (Epping) for cyclist” No specific proposals exist ! The identified link between Epping and Coopersale is little more than a 1.1m wide walking track with regular barriers to cycles along the route.

4.8.3 Ability to deliver on improvements in sustainable transport is questioned on grounds of cost, restraints of existing highways and boundaries of Forest land.

5.3.3 It is acknowledged that potential and additional employment sites may be centred on Loughton and Harlow which will involve the generation of vehicular movements around and through Epping. There is no indication in the report of the impact which employment opportunities offered outside the area necessitating travel by LTE , and the traffic which would be attracted to the tube station in Epping which would result from this.

Figure 5-1 It is noted that the identified industrial site at Loughton is adjacent to Junction 5 on M11 where there is no access to traffic from the north.

6.5.11 Whilst the reduced levels of parking are understandable, the nature of car ownership in a small town such as Epping is essentially urban. Traffic generated by delivery and collection trips to LTE station is significant, particularly at peak times, and the 400m walking distance may not be regularly observed. See para 6.10.2 where a minimum threshold distance of 1500m has been applied to the model.

6.8.6 The figure of 1% of traffic being typically through traffic is surprisingly low : even the figure of 3% used in model would be low for traffic generated by connectivity when there is disruption to flow on adjacent motorways M11 and M25. There is some acknowledgment of this by the figure of 12% reassignment in para 6.11.8. , which may not be representative for Epping High Road when major blockages of the surrounding highways occur. This would also apply to the LGV/HGV assumptions in Table 6-10.

6.10.4 The impact of rail heading would apply to the junctions in the centre of Epping , particularly at Bower Hill/Station road which is not included in the model.

7.1.3 The previous studies are not identified. A reduction of 8% in car trips is doubted , particularly when the aging nature and number of retires which make up the residency of Epping are taken into account.

7.1.4 There is no indication, objective or masterplanning in housing developments for Epping and North Weald that these will be Garden Town Communities.

7.2.2 The Cycle Action Plan is not a referenced document; its objectives are admirable but there are no details of what is to be implemented and they are considered to be unachievable. The statement that this could be delivered in part or full by the Local Plan is little more than a fairytale.

Figure 7-1 There are no major linking cycle routes shown . Those shown as routes along B1393 south of Epping are unlikely to be sufficiently wide to attract cyclists due to restrictions of Forest land.

7.3.3 Again, the objectives are admirable but are unlikely to be realised. Routes through the town centre of Epping which centre on the LTE station are well used but are affected by heavy traffic and blockage . Bus priority lanes on B1393 and B181 cannot be provide because of restrictions of Forest land.

7.3.4 Interconnectivity is of sufficient importance in local planning that specific routes should be considered with the current Local Plan proposals and not left to be finalised within the eventual Masterplan of the principal development sites.

7.4.4 The LTE provision at Epping is a vital and much appreciated connection to Central London. Usage in recent years has greatly increased and there are many examples of full trains leaving and arriving at Epping at peak times.

7.4.5 Local users would disagree that the solution to the traffic problem at Station Approach and the entry off Station Road can be solved by incremental change. A major remodelling with fully integrated train, bus, drop off and parking with improved road access would be a major undertaking and costly. It will, however, certainly be required within the planning period to 2033. The funding by CIL or Section 106 is dealt with in the Infrastructure response.

7.4.8 Costing of travel to London from Harlow greatly affects the rail heading from Epping LTE station and should be considered on a regional basis. Currently bus fares and travel from Harlow are considered to be an expensive option to car and tube travel.

8.2.2 School trips from proposed North Weald development and from Coopersale and Thornwood would, under current arrangements involve travel to St John's to the south of Epping.

8.4.2 It is noted that the changes from Scenario 1 (Existing) show an 18% increase without the LPSV proposals to 36% increase, a further 18%, with the planned developments without sustainable transport.

8.4.4 As a 15% increase can be attributed to 'Do-Minimum" , ipso facto, a reduction of 3% can be attributed to sustainable transport.

8.4.5 It is noted that traffic arising from approved developments up to October 2016 is included. Is the additional 7% increase in the model sufficient to provide for approved developments in the area other than those included in the plan ? How will this be monitored and controlled ?

8.5.6 and 8.6.7 Local experience can confirm that these corridors are operating at capacity with long tailbacks, particularly when traffic from surrounding road blocks, M11, M25, A414 occur.

Table 8-3 , 8-4, 8-5 and 8-6. .It is noted that figures for Junctions 16 and 17 are omitted. There are T junctions which are known to be accident spots. Thereare also no results from modelling at Appendices D, E , F and I.

8.6.3 The statement that some junctions may be subject to 50% to 80% growth particularly in Epping is alarming when the current and predicted levels of traffic are considered.

8.7 This summary would be endorsed by residents and businesses in Epping and is one of the reasons why there is strong opposition to the LPSV plan.

8.7.2 The introduction of measures to encourage the use of sustainable transport, based on the success of this over the past years is doubted, as is the delivery of physical improvements by CIL or Section 106 measures. Hence it can be predicted, as the report concludes, that , " parts of the existing highway network would struggle to accommodate all the LPSV growth" is an understatement of the future situation .

Table 8-6 The extent of red as an extension of Scenario 2, traffic growth and approved developments , to Scenario 3,with LPSV developments , shows in a very significant a warning of future road blocks in the Epping area.

9.1.2, The constraints are particularly evident in and around Epping. Schemes which are at the concept stage should be identified as part of the plan.

9.1.3 The NPPF guidance does not seem to have been adhered to.

9.3.2 Consideration has not been given to the implementation of major transportation proposals in the area. Although these may be dismissed as unachievable on cost grounds , with such a major study connected to the housing proposals and the continued growth of traffic, a wish list of schemes which would significantly mitigate the predicted ,(and existing), sectors operating at overcapacity should have been prepared. Funding from Central Government funded sources should not be rejected, and vigorously pursued . Outline proposals which could be developed into schemes for submission for central Government funding are :-

A ring road for Ongar linking A414, A113 and A128 .

A major transportation interchange at Epping LTE station.

North facing slip roads at Junction 5, M11 , Debden

Improvements to B172 and A113 at Abridge .

Realignment of A414 Epping Road at Bobbingworth and approaches to Ongar, Four Wantz roundabout.

A futuristic transportation link between Epping LTE station and Ongar with link on to Chelmsford, ie. Guided bus or similar dedicated link. (This was the objective of the closed Epping to Ongar LTE line).

9.4.2 A major scheme for the Wake Arms roundabout is unlikely to be implemented as it would be strongly resisted by the Forest Conservators. A Parliamentary Bill would be required to acquire land and it is very unlikely that a proposer for this could be found.

John Manning 5 April 2019