

MATTER 13

RESPONSES OF LOUGHTON TOWN COUNCIL ("LTC")

ISSUE 1

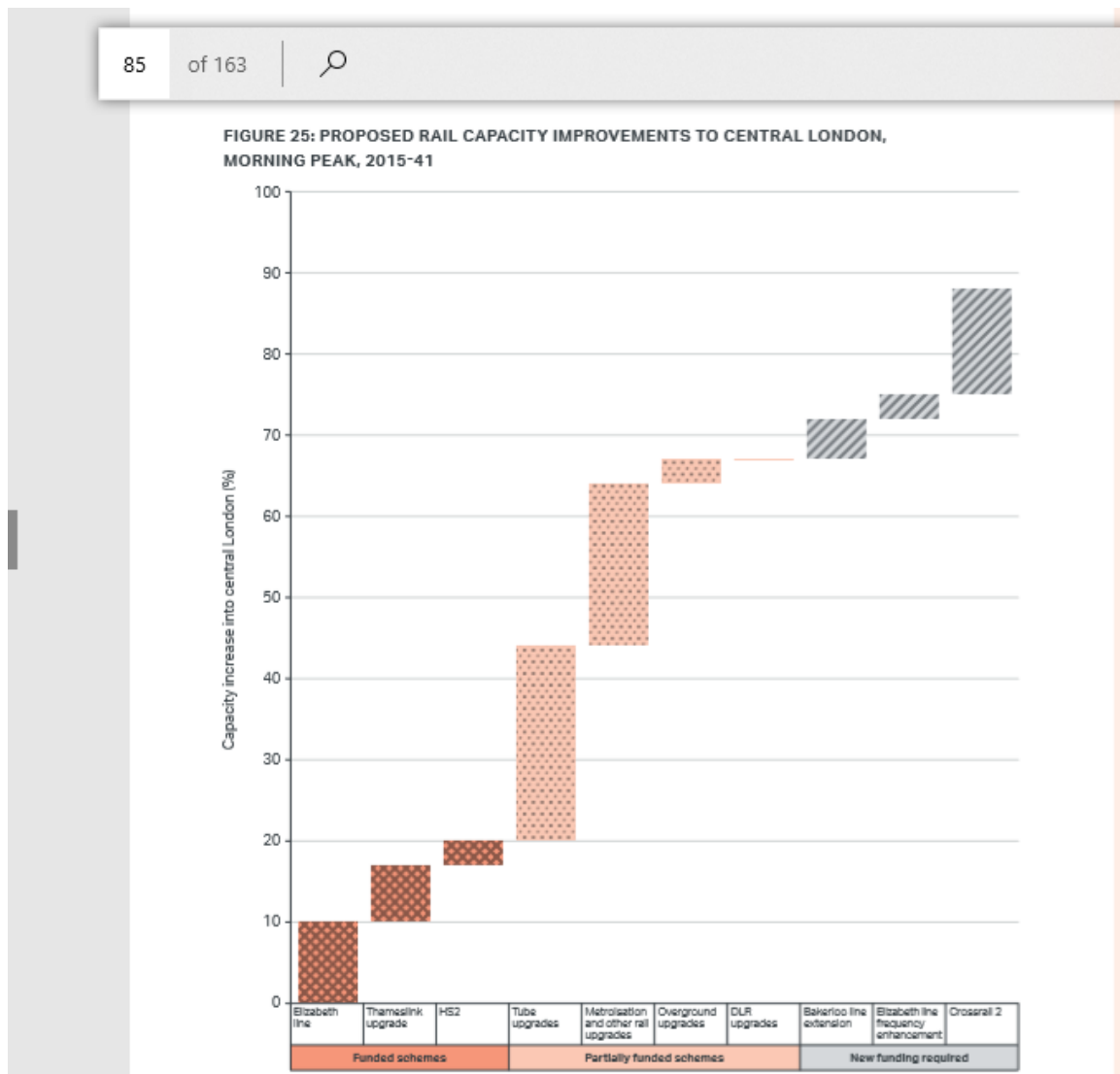
The Statement by Loughton Town Council in relation to Matter 15, specifically set out the Town Council's concerns in relation to the impact of the development in the Plan on traffic and infrastructure in the area around Loughton. In addition to the points made below in relation to the specific aspects of the Central Line capacity and junction improvements, Loughton Town Council have also raised their concerns over the reliance on bus routes and bus improvements as a key means of delivering sustainable growth.

Q1 Has regard been had to the Mayor of London's draft Transport Strategy and London Plan in proposing T1 and are its provisions clear and effective?

Specifically related to TfL and the Central Line

1. The Plan seeks to deliver growth on the Central Line corridor. Representations submitted by Loughton Town Council have made the case that there are significant concerns over the capacity of the Central Line to accommodate additional passengers to meet the demand which will be generated by the draft Local Plan, particularly during the early years of the Plan period. The Transport Assessment Report (TAR, EB503) itself specifically acknowledges the operation of the Central Line at or above capacity during peak hours (Table 4-5 and 4-6, page 21). This is a situation which is unlikely to be resolved by the time that the development in the Plan at Jessel Green is intended to come forward.
2. It is noted that Policy 16 of the Mayor's Transport Strategy (2018) specifically looks to transform London's rail system with updates and to provide an increase in capacity of 80% by 2041, to tackle overcrowding. Figure 25 of this Strategy document (included below) shows that the intended tube upgrades are only partially funded. It also observes that the overcrowding on existing infrastructure (including the tube lines) will need to be in part resolved through the delivery of

new infrastructure, such as Crossrail 2, which will release the pressure on the existing infrastructure. Crossrail 2 is not intended to open until 2030. Furthermore, Figure 25 shows that this is entirely reliant on as yet unsecured funding. Therefore, both delivery and the timing of delivery of improvements to the tube and related improvements to improve tube capacity are uncertain both in terms of timing and funding in the Plan period.



- It is acknowledged that Proposal 63 of the Mayor's Transport Strategy states the Mayor's intention to invest in the capacity and reliability of the tube network. The text supporting this proposal does not however set out any specific timings or proposals relating to the Central Line.

4. The Representations made by Loughton Town Council in December 2016 highlighted the reasons for constraint on the capacity of the Central Line, as follows:
 - The size of the tunnels is established therefore there is a limited capacity for increase in carriage size.
 - The length of platforms in Central London limits extension to the length of trains used.
 - The frequency of trains is limited by the signalling system, improvements to which can only deliver a limited additional capacity.
 - The fare structure (whereby underground is less expensive than over ground trains from outlying stations) means that the trains are crowded on departure from the terminus, and additional passengers cannot board in Loughton or on points further south.
5. These concerns remain an issue in the context of the evidence available.
6. The Town Council also considers there has still been insufficient analysis of capacity at different points on the line at varying times of day, in the context of the location and extent of growth proposed. In other words, the locations of growth do not necessarily increase demand in the areas where there is existing spare capacity. For example; the Infrastructure Delivery Plan [EB1100] (page 23) states that TfL's RODS data indicates that, on the five stations at the end of the Central Line in Epping Forest District, peak hour capacity is around 37% utilised, but that there was no available data on the capacity of individual stations at that time. Thus, there was no evidence as to the number of passengers that could be accommodated by the station premises and its facilities at any one time and no evidence that any stations are nearing total capacity. However, it is understood that concerns were expressed by residents through previous consultation on the Local Plan that certain stations are constrained. Subsequently, the representations made by TfL have set out that there may be capacity issues at stations which will need addressing during the Plan period. This therefore remains a matter of uncertainty.
7. Loughton Town Council notes the submissions made by TfL to the Plan; in these they specifically state that crowding relief and therefore the capacity of the Central

Line will not be known until Crossrail has opened, which is due in late 2019. The reliance on Crossrail and its timing creates risk and uncertainty around the extent and timing of improvements needed to the Central Line to alleviate future capacity constraints. The Plan should not therefore be reliant on this.

8. TfL's submission also highlights the need for improvements to the entry and exit capacity of some stations as a result of the planned growth and that this *"could best be achieved through CIL or s106 contributions toward station access and capacity improvements."* There is no clear reflection of this in the Plan or accompanying IDP.
9. Furthermore, the TfL responses states that *"It will be important that Epping Forest District Council require developers to prepare an assessment of station capacity and put forward proposals to mitigate any impacts where this is likely to be an issue."* It is unclear from this requirement as to how a developer is expected to assess station capacity and then make the necessary mitigation proposals to TfL's satisfaction. Moreover, Loughton Town Council questions how the requirement and extent of improvements can be assessed and tested as part of a single development coming forward and as to how much certainty this provides in terms of future improvements to the Central Line by requiring improvements in this incremental manner.
10. There is therefore no certainty as to the timing or delivery of the improvements which undoubtedly will be required to the Central Line to meet capacity demand. Nevertheless it remains the Council's approach to prioritise growth around Central Line stations. Furthermore, the impact will be more keenly felt in the stations towards the end of the line on the branch line of the Central Line, for example at Loughton, where a significant proportion of additional growth is specifically located.
11. It is the case of Loughton Town Council that the phasing and timing of growth around the corridor should be reduced (as set out in Loughton Town Council's submissions in relation to Matter 15) and/or re-scheduled so that it is later in the Plan period to allow for the planned improvements to the Central Line in advance of development in these areas.

Q2

No further comment

Q3

No further comment

Q4

No further comment

ISSUE 2

Will Policy T2 be effective in protecting the land for future transport schemes from development.

Q1 Is it necessary to list the particular schemes for which land is required to be safeguarded?

12. Yes. Furthermore, there are uncertainties as to their delivery. The Representations submitted by Loughton Town Council have highlighted concerns over the bottleneck locations where junction improvements are required. This is exacerbated by the boundaries of the Forest, which are a constraint to development.
13. The growth in Loughton will exacerbate the impact on transport and highways and journeys through the Forest area, as recognised by the Plan. This was set out further and specifically in relation to Matter 15.
14. The IDP (EB1100, page 17) notes that *“congestion is an issue within towns throughout the District. Discussions with ECC have highlighted in particular that the road through the centre of Epping (B1393) currently experiences significant congestion problems, particularly around Ivy Chimneys/Bell Common traffic lights and Wake Arms roundabout. This is partly due to the significant flow of residents to London, and to the town centre. The B181 between North Weald and Epping also experiences significant pressure. Similarly, routes through Loughton are congested. Congestion around Loughton is exacerbated by the fact that Junction 5 of the M11 has no northbound slip road, which subsequently draws traffic into the surrounding*

areas to access the motorway.” This is also reflected in the Epping Local Plan Highway Impact Assessment (Technical Notes 1-8) (2013 onwards) scenario based modelling.

15. Loughton Town Council retains concerns in relation to the impact of increased traffic on these junctions and the extent of this impact in the context of the approach to modelling which assumes future improvements to bus routes and the Central Line to assist in reducing car reliance. The timing and extent of such improvements is uncertain, therefore there remains a significant likelihood that the impact of traffic on these junctions will be worse than assumed in the modelling which supports the assumptions of the Plan.
16. The Modelling in the Epping Local Plan Highway Impact Assessment (Technical Notes 1-8) (2013 onwards) shows that by 2036, the majority of junctions across the District will have at least one arm operating above capacity. The impacts of development against this background growth analysis is likely to result in an increasingly congested and unreliable road network. Work was also done to understand opportunities for mitigation at particular junctions. Following this work, it was recognised that a shift in modal share towards public transport will be required to support growth in a sustainable way and evidence provided by Jacobs at the Examination into the Local Plan, Matter 4, Issue 6, confirmed that even further improvements to sustainable transport modes may be needed to achieve car reduction targets in the Plan.
17. The TAR 2019 includes specific improvements to road junctions in the Plan period, but the majority of these are on Forest land. There is uncertainty in terms of both the delivery of these improvements in this context and the ecological and air quality impact of the increase in road capacity in the Forest, which needs to be considered in the context of the HAR (?).
18. Not only has the Plan not adequately considered the impact in terms of air quality on the Forest as a result of the extent of traffic and improvements required (as set out in relation to Matter 1 Issue 5), but there is also insufficient certainty that the land is available to improve these junctions and that the impact of any such improvements will be acceptable on the Forest. Furthermore, these are not in areas where exchange land is available in the vicinity to assist in the mitigation of impact.

Loughton Town Council

Loughton Library and Town Hall

Traps Hill

Loughton

IG10 1HD