

4. This representation relates to**Paragraph 5.24 et seq****Policy SP2**

Site reference

Settlement Loughton**5. We consider that this part of the Submission Version of the Local Plan is****b) Sound: No**
because it fails**Positively Prepared****Justified****6. 6. Details of why we consider the Plan to be unsound****6.1 Summary**

At least 35% of households in extra building in Loughton and Epping can be expected to travel into London, thus contravening Policy T1B & T1Cⁱ which provide

“B Development should seek to minimise the need to travel,....”

“C. Development proposals will be permitted where they:

.....
(iv) do not result in unacceptable increases in traffic generation

6.2 Central Line capacity issues

6.2.1 The Central Line is at or beyond capacity at times people need to travel. There is no evidence at all that there is spare capacity, save at off peak times. Some limited capacity improvement may be available, according to Transport for London, within the plan lifetime, but not in the near future. The AECOM report (Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan Non-Technical Summary Dec 2017) para 3.47ⁱⁱ assumes proximity to the Central Line will improve modal shift.

6.2.2 New trains (capacity improvement for standing passengers only of some 50 per train) on the Line are not expected until right at the end of the Plan period (2030).
New signalling might deliver a maximum of 2 extra trains per hour (576 seats) but that is not due within 10 years. (TfL have also considered reducing seating capacity on the Loop line by cutting 8-car trains to 4, but are understood to have postponed this, at least for 2018).
The overall capacity improvement may be of the value of 22%, but with little or no seating * capacity increase.

6.2.3 There is thus no justification for concentrating housing growth in the Central Line corridor, and none at all for countenancing such growth in the early part of the plan period.

6.2.4 The Plan is therefore unsound in expecting Epping and Loughton to accommodate substantial growth in the first ten years. Such growth would be largely unsustainable.

7. Changes needed

Any growth along the Central Line should be re-phased to take place towards the very end of the Plan period.

8. Participation in the oral part of the examination

Yes, we wish to participate in the hearings.

9. We consider this to be necessary because

We think that it is necessary for us to participate at the hearings

- Because of our local knowledge (see description of Loughton Residents Association below)
- Because of the Council's failure to take proper action in respect of the views expressed in public consultations or in feedback from local Cllrs (see for example our representation on Site LOU R5 Loughton).

About Loughton Residents Association

Loughton Residents Association is a very active group of local residents who care for Loughton and its environment. Our membership is around 1,000 households, and we have been in existence for over 35 years. We are independent of any political party. We seek, and listen to, the views and concerns of Loughton residents and take action in support. We have a majority of the councillors on the Loughton Town Council, are the second largest group on Epping Forest District Council & are represented on Essex County Council. We provide our own regular printed and email newsletters to residents and our own website, www.loughtonresidents.org.uk

10. We wish to be notified when the Plan is submitted for independent examination

Yes ✓

11. Have you attached any documents to this application? No

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Signature:

28/01/18

ⁱ Policy T 1 Sustainable Transport Choices

B. Development should minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future.

C. Development proposals will be permitted where they:

- (i) integrate into existing transport networks;
- (ii) provide safe, suitable and convenient access for all potential users;
- (iii) provide on-site layouts that are compatible for all potential users with appropriate parking and servicing provision; and
- (iv) do not result in unacceptable increases in traffic generation or compromise highway safety.

ⁱⁱ 3.47 The preferred spatial strategy involves a dispersed approach to development across the District with a focus on development around Harlow. Development directed towards the south of the District will have good access to public transport and services/facilities and therefore good potential to support modal shift away from car dependency; however, there are existing traffic problems that could be worsened.

<http://www.efdclocalplan.org/wp-content/uploads/2017/12/Sustainability-and-Equalities-Impact-Appraisal-Non-Technical-Summary-AECOM-December-2017-EB204A.pdf>