

**4. This representation relates to**

**Paragraph 3.84**

**Policy Policy T1**

**Site reference Sites R4 and R5**

Settlement

**5. We consider that this part of the Submission Version of the Local Plan is**

**b) Sound: No**  
because it fails

**Positively Prepared**

**Effective**

**Justified**

**6. Details of why we consider the Plan to be unsound - failure to design site allocations in line with the requirements of Policy T1 Sustainable Transport Choices**

- 6.1 The infrastructure plan envisages the growth of motor traffic from developments in Loughton would require substantial improvements to two junctions which are within Epping Forest land and which would require Epping Forest land. The junctions and the schemes recommended in the latest Highways Report<sup>i</sup> are
- 6.1.1 A1168 Rectory Lane Pyrles Lane – Loughton (Junction 1): Potential scheme required
- 6.1.2 Wake Arms PH - Epping Forest (Junction 29): Enhanced roundabout with local widening to increase approach lane and circulatory capacity.
- 6.2 As envisaged by the Council<sup>ii</sup>, these are undeliverable because of the inalienability of Forest land without exchange land in the vicinity. The plan is therefore unsound in that it cannot deliver these junction upgrades.
- 6.3 We also note that according to Transport for London's 2016 Draft Local Plan consultation response, they are relying on Crossrail opening in 2019 to reduce Central Line capacity problems. This is on the basis that commuters will be willing to travel substantially further to board trains in the London Boroughs of Havering, Newham or Waltham Forest. This seems to us to be extremely unlikely to attract any commuters from Epping Forest, but if it were to be borne out in practice it would of course increase the road traffic burdens on these junctions.

**7. Changes needed**

- 7.1 The Plan might be made sound in this respect by abandoning large (>50 dwelling) developments likely to possess cars near the capacity deficit junctions, or by drastically reducing their housing numbers. The sites involved are LOU R4 and R5.

**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](http://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**



**Signature:**

**28/01/18**

i

<http://www.efdclocalplan.org/wp-content/uploads/2017/12/Highway-Assessment-Report-Ringway-Jacobs-2017-EB502.pdf>

ii "Whilst some junctions could be improved most physically cannot be improved or would have environmental consequences by doing so. For example, traffic congestion and delays that occur on the routes south of Epping could only be resolved by using land which forms part of the Forest.." (3.84, p72)

"3.88 Recognising that there is a need to manage any future growth in car travel the Local Plan has taken into account the need to maximise the potential to widen sustainable transport choices and encourage reductions in car use wherever possible by:

- considering existing and future sustainable transport opportunities as part of the criteria when identifying sites for housing and employment;....." (p73)