



HEGNPG

Supporting our Community

Hunsdon, Eastwick and Gilston Neighbourhood Plan Group Response to HGGTB Transport Strategy Consultation

1 Background

- The strategy is dated January 2019 but is only being consulted on 12 months later - why the delay? The document is also 12 months behind the main planning applications. The documents also seem to be a step change from what was consulted on by the main applicants.
- We are confused as to why the transport strategy makes almost no reference to the HGGT's Context and Vision as a significant place within the M11 growth corridor. Stansted is expanding as an airport serving London but with almost no transport improvements. The railway line to Cambridge needs further investment. The M11 capacity must be under pressure with the already-committed growth. The HGGT Transport strategy has nothing to say on all these issues; is that really a tenable position for a strategy document?
- Transport is under pressure already: the C161 is under severe overloading, Harlow Town Station and its interchange has problems, the cycle network needs remedial investment; the strategy is silent on these issues.
- Rail capacity is limited with no end date of when new rolling stock will be delivered onto the Stansted Airport to London line; will the rail capacity be enough to accommodate the HGGT planned growth? The strategy surely should not be silent on this point.
- Solutions for the A414 are put forward in the plan with a disgraceful lack of evaluation of options and environmental impacts.

2 Strategy addresses three key issues

- **60% modal shift ambition** – but only within the new developments? This doesn't account for people moving outside of the developments into the surrounding areas. This is a very low figure for people travelling within the villages, given they should be extremely sustainable places to live. For example, local shops, schools and health should all be within walking or cycling distance. This means that 40% of people will still need to travel by car for access to key services. That could be over 10,000 car trips being made within peak times. This is based on only one car per house and doesn't account for people travelling to and from the villages for work or serving and deliveries. The strategy is not supported by survey data on how people will travel to work. Most people will travel outside of the villages for work using the roads, rail and bus connections; data is needed to support either the model shift or proposed projections.
- **Travel Hierarchy changes** – Noted and supported. However, such a proposal needs some understanding of the financial implications, otherwise it feels like a dream rather than something achievable.
- **Efficient and safe travel** – Noted and supported. But as above, nothing is costed.

3 Existing conditions ignored so no recognition of the problems

- C161 is a C road being used as *de facto* northern bypass – this is unsafe and has a history of accidents.
- No transport proposals to travel north of HGGT and proposed villages. People will also want to travel to Bishop's Stortford and surrounding villages; we are unclear why these movements have been ignored?
- A414 is heavily congested, partly by through allowing retail warehousing without the needed traffic improvements.
- Transport interchange at Harlow Town station is suboptimal and not maintained; what is the point of seeking major new investment if the current investment is not maintained and the reality of that is ignored – the strategy needs to address such issues otherwise it is doomed to repeat the past problems.
- No clear commitment for new links to the station appear to have been included; the northern access for example. Surely these should be major priorities? Network Rail appear to have had limited engagement with the strategy.
- Harlow Mill Station seems ignored as a stop on a massively valuable transport system.
- Harlow's cycle network is excellent in concept terms but fails in many respects through historic lack of investment and neglect.
- We are not clear what New Hall and Gildea Way developments are offering as contributions to achieve modal shift, as proposed. We have asked but not been given any answers. These developments are now well established and can offer very limited or no assistance to improving transport links to Harlow without major replanning and investment. If there has been a failure to capture land value gains then there ought to be learning from that failure?
- The plan appears to lack references to all updated national and regional transport policy.

4 Objectives

- If the modal shift proposed is to be real what will be the impact on future traffic in Harlow? For example will the retail warehousing in Harlow carry on with no change - so with no public transport/cycle provision and no assumed home delivery service? All such changes will have major impacts on A414 through Harlow.
- The problems are real now - housing development cannot be allowed without advance investment in transport (alongside other infrastructure) - the system is broken now BUT Gilston's Village 7 developer, by way of example, seems to want to defer investment in transport so it can add extra traffic before being asked to fund improvements. The strategy needs to be clearer in its intentions and require developers to clearly show how their proposals will respond to the transport strategy.
- A very high % of people moving into the new homes will come from outside the local area. Many of these people will likely be moving from London and will likely work in London. Lacking a clear vision to upgrade two Harlow stations, their interchanges and wider sub regional connections is a significant missed opportunity.

5 Action Plan

- Not founded in reality - needs reworking to recognise the existing problems. The significant delays in delivering minor upgrades to the A414 along Edinburgh Way have resulted in

lasting impacts to local businesses and environment. These works (when finished) will not increase any road capacity as developments in Newhall and Gilden Way are near completion and will consume this new capacity. These developments, some currently under construction, appear highly car dependent and appear to have poor infrastructure planning.

- The Map at 4.15 indicates a new A414 crossing of the Stort as a concept but fails to consider the alternative options or the environmental impacts of this proposal.
- The current planning applications for the two crossings consider that both will be for increased traffic. However, this document only talks about adding bus lanes. This is significantly misleading and it is very disappointing that previous public consultation feedback has been ignored.
- The current deficits cannot be ignored, transport infrastructure needs to precede development.
- Harlow Mill Station is not optimised as a potential interchange, it is ignored – why?
- Gilston OPA's do not show how their suggested sustainable transport connections to the Stations will work and there is no detail and an assumption that others will pay to resolve the traffic impacts of these major developments.
- We have offered a solution to the connections between the Gilston proposals and Harlow but after four months have not had a response from HGGTB.

6 Conclusions

- Overall the M11 growth corridor has always had a lack of sustainable transport and investment. The strategy does not make reference to this wider context of movement; surely it should?
- The strategy does not reference the things that are not working well in Harlow and so the need for an approach to fix the deficits. Our concern is that without that analysis the existing failings will be repeated.
- The strategy assumes that the new developments will achieve the modal shift without providing the connecting 'link' to how developments will be delivered by developers to achieve this ambition.
- The strategy contains proposals that will greatly harm this community without any analysis of the options or environmental assessments of the consequences of these proposals; we fail to understand how these omissions can be tolerated by the HGGTB.
- The strategy requires significant further work and following that a fresh consultation.

Anthony Bickmore, Chairman HEGNPG
25th February 2020