

EFTC Presentation at the Local Plan Examination

Introductions: Representing the Town Council

This presentation follows the submission by the Town Council dated 19th January 2018.

Annex M

Key Issues

The Town Council supports the Local Plan in delivering a balanced and appropriate approach to new housing in the District provided it is supported with appropriate social and transport infrastructure.

The character and quality of Epping town and parish, and the existing problems of a) road congestion and b) excessive commuter parking mean that new development has to be carefully planned to avoid adding to the problems and minimising damage to the character and qualities.

There are concerns however that the Infrastructure Delivery Plan which supports the Local Plan will not provide the required support.

The Town Council has concerns over the ‘soundness’ of the Plan if it fails to deliver the infrastructure. In an area with unique environmental sensitivities – notably Epping Forest and the character and heritage of Epping town, and the pre-existing problems of traffic congestion, new development must be supported by adequate and appropriate public transport, traffic management, effective walking and cycling proposals and car parking as required by the National Planning Policy Framework 2018 (NPPF) to deliver genuine transport options.

During the time that the Local Plan has been developed, the Town Council has been preparing a Neighbourhood Plan. The process to date has included the Reg. 14 consultations and final revisions, and adoption by ETC (date). Discussions have been held with EFDC officers to ensure conformity during the N. Plan preparation and it is anticipated that it will be formally submitted to EFDC at an appropriate stage after the outcome of the Local Plan Examination (copy of NP attached).

As a result of the work undertaken to develop the Neighbourhood Plan, two sites proposed for development in the Local Plan - the Library (EPP R11 for 11 new homes) and the Cottis Lane car park (EPP R6 for 47 new homes) have been replaced by an additional site - the Bell Hotel site (for 50 new homes) as a brownfield option which would enable improvements to the adjoining road and junction.

Proposals for minor modifications to the IDP to enable the required infrastructure are set out below.

Background

Epping is located on a ridge of higher ground (as much as 30-35m higher than surrounding land). It is situated between two areas of Epping Forest with much of the parish's open land in the Metropolitan Green Belt. The town remains a market town with history and much built heritage. It has a charming and distinctive appearance, much appreciated and valued by residents, as evidenced by the consultation responses to this Plan and the Neighbourhood Plan. Much of the town centre is within its two conservation areas.

The main road through the town is single carriageway 'B' category, the B1393 – to the south it enters Epping forest and crosses the M25 before linking with Loughton and junction 26 of the motorway. There are strong and persuasive reasons for not up-grading the road through Epping Forest which appears as a country lane, notably the character and appearance of the Forest and issues of air quality, pollution and urbanisation. Northwards the B road travels in the direction of several villages and eventually the outskirts of Harlow and junction 7 on the M11. To the east the road system connects with North Weald Basset and Ongar – both of which have considerable planned expansions in the Local Plan. Areas to the west, in the direction of Hoddesdon, Broxbourne and Cheshunt are accessed by country lanes. The EFDC Local Plan acknowledges that roads, notably south of Epping towards the M25 and London are operating at or over capacity with little scope for improvements (para.3.84)

Epping is the foremost market town in the district, with two conservation areas, maintaining its character, historic environment and appearance is vital.

The town suffers with traffic congestion and commuter parking (see evidence in Annex A). The Central Line Tube system terminates at Epping and provides services to Stratford, Liverpool Street, Central London and the City. To the east, the TfL Rail line terminates at Shenfield near Brentwood. Cheshunt to the west is served by London Overground services which connect with Harlow. Many commuters travel to Epping in order to use the cheaper 'Oyster card' payment system on the Tube (not applicable to the West Coast Anglia trains which connect Harlow to Liverpool Street) – see EFDC Local Plan para. 3.83

Changing technology to include electric vehicles means that managing car traffic will remain a major challenge in and around Epping over the lifetime of the Local Plan and beyond.

The environmental sensitivities within the Parish – Epping Forest, air pollution and the quality of life for local people, gives a clear emphasis on the need to achieve sustainability in planning new developments.

A summary of the Infrastructure Delivery Plan (ARUO December 2017) proposals for Epping appears in Annex B. In support of the Local Plan it lists:

- 15 transport items as Essential funded by Developer Contributions and Essex County Council, creating cycle 'Quietways' and junction improvements on the B1939, with total estimated costs of over £15m (includes £10m for the bridge over the railway at South Epping), + three un-costed schemes.
- 15 transport items as Desirable funded by Developer Contributions and Essex County Council, including broader traffic management proposals and walking routes, with total estimated costs of £20m, perhaps as much as £27m + four un-costed schemes.

For development elsewhere in the District notably around Harlow, the proposed transport infrastructure funding includes Government grants.

Statement

The Town Council accepts the Plan's broad proposals for new housing development in Epping which responds to local needs, respects the character of the area. In order to be sustainable, the new development should avoid adding to the environmental pollution created by inappropriate levels of traffic, and should be supported by suitable social and transport infrastructure. This position reflects the requirements of the NPPF and has been developed within the Neighbourhood Plan.

In detail, the Neighbourhood Plan matches the total number of new homes in the Local Plan and mirrors the larger sites:

- South Epping 950 homes EPP R1 and R2
- Station redevelopment EPP R3 89 new homes (although N.Plan Reg 14 response from TfL Commercial indicated a higher but unspecified number)
- St John's redevelopment Epp R4 – likely to be around 50 new homes
- Epping Sports Centre EPP R5 43 new homes
- Civic Offices and adjoining land EPP R8 and R10 50 new homes
- Bower Vale Epp R9 50 new homes.

However through the Neighbourhood Plan process it was decided to retain essential local facilities - the Library (EPP R11 11 new homes) and the Cottis Lane car park (EPP R6 47 new homes) and identified the Bell Hotel site (50 new homes) as a brownfield option which would enable improvements to the adjoining road and junction.

Key to these developments is the transport infrastructure to support them.

Paragraphs 102 -104 and 108 of the National Planning Policy Framework 2018 set the picture for achieving sustainable transport, notably para 103 which requires significant development to be focused on locations which are or can be sustainable, through limiting the need to travel and a genuine choice of transport modes. Para 108 discusses mitigation of significant impacts on the transport network.

The Town Council remains concerned that the transport infrastructure in the Infrastructure Delivery Plan will not support residents in the proposed new developments, won't deliver genuine alternatives and will add to the current problems of congestion and pollution. Data from the last

census indicates Epping residents' travel to work and car ownership patterns. The Plan's policies on walking / cycling plus the Central Line tube terminus in Epping won't meet the transport needs of all new development.

The proposals in the IDP refer to the Essex CC Cycling Strategy (see Annex C). This acknowledges that cycling declined 2001-2011, and has un-specified aims of reversing this and increasing usage. The Strategy has targets of journeys less than 3km in length and school travel neither of which will impact the problems of commuter and travel to work travel patterns and congestion in Epping's situation.

The NPPF para 103 seeks genuine choices of transport. The Plan's policies for development seek a modal shift from cars to walking and cycling. This is supported by the Infrastructure Delivery Plan which in turn refers to the Essex County Council Cycle Strategy (Nov 2016). The Local Plan's Strategic Policies (notably policy T1) seeks this modal shift to address residents' needs, to reduce the need for travel by placing homes and employment together, and reduce congestion with its associated pollution. Policy T1 anticipates having reduced or no car parking within 400m of the Tube terminus at Epping, and reliance on walking and cycling elsewhere. However the flaws in this approach become apparent as the Plan also seeks to find development sites which don't eat into the Green Belt and the Forest – hence the Plan proposes housing development in place of two employment locations (Bower Vale and Civic Offices) and on two of the town centre's main car parks

The balance between Essential and Desirable items in the IDP and policy T1 do not deliver genuine transport choices for the 1,300 new homes proposed in Epping Parish but follow the doctrine that car transport can be supplanted by walking, cycling and the Tube. Three factors render this approach impractical:

- the situation of the town centre and its facilities run along a ridge of ground, walking and cycling would be impractical for many from locations on the outskirts, up-hill to the town centre, e.g. elderly residents, those with shopping, or during inclement weather,
- as a terminus station the only travel option by regular, reliable public transport – the Tube is southwards, for other travel needs beyond the town to adjoining settlements like Harlow, Cheshunt, Ongar and Chelmsford, a car is required
- there is limited space within the Town's highways to deliver the proposals in the Cycling Strategy for segregation from motorised vehicles; the Strategy's proposals aim to reduce car usage for journeys under 3km and travel to school neither of which will greatly impact the current commuter-congestion problems, nor achieve the desired modal shift for new development in an area for which much of its employment, shopping and social and entertainment needs are much further than 3km away.

If the Local Plan delivers new homes supported with adequate and appropriate infrastructure, Epping Town Council recognises that 1,300 new homes can be accommodated in the parish. Without the necessary investment in infrastructure in the Parish, the approach within the Local Plan will be un-sound, will not offer the genuine transport options required by NPPF and the focus of new housing should be re-directed to those parts of the District where major transport infrastructure investment is proposed.

Changes to the IDP

The Infrastructure Delivery Plan supporting the Local Plan will not as it stands provide for the new development nor realistically tackle the traffic and congestion problems for Epping.

The Town Council would request that the following modifications are made to the Infrastructure Delivery Plan in support of the Local Plan proposals:

- that the priorities for the IDP items should be firstly to mitigate the impact of the new developments, secondly to encourage more effective use of public transport, thirdly walking and cycling for trips around Epping of less than 3km, fourthly traffic management measures directing traffic to the nearby motorway routes,
- that the use of s.106 developer contributions to address the Essential items is combined with a government grant e.g. the Housing Infrastructure Fund to ensure a realistic chance of the Essential infrastructure being delivered.

In order to better support the transport needs of the proposed developments, the IDP proposals should:

- Change the one proposal to support Public Transport – EPP 31 – improved bus facilities at Epping Station - **change from Desirable to Essential and link it to a park and ride scheme**
- The proposals for traffic management to better direct commuter traffic towards the M11 and M25 (rather than the B1393) – EPP 24 Real-time road signage / traffic management and EPP 32 New signage to M25 / M11 - **change from Desirable to Essential**
- The proposals to support cycling – **change from Essential to Desirable**
- **New proposals to promote cycling be introduced in conjunction with a 20mph speed limit designated as Essential linking the schools in the area with the nearby residential areas – current and proposed**
- The three proposals to support walking EPP 27 Junction improvements at Bower Hill / Brook Rd and improved pedestrian route along centre Drive to town centre, and EPP 29 & 30 – new Greenway routes connecting the town to the Forest - **change from Desirable to Essential and properly costed,**
- **The multi £m proposals to upgrade junctions on the B1393 be put on hold pending reviews of a) the traffic management proposals to re-direct traffic away from Epping town centre and b) the potential impact of a park and ride scheme linked to Epping Tube station and improved bus facilities there.**

A summary of the Infrastructure Delivery Plan (ARUP December 2017) proposals for Epping is shown in Annex B.

The largest single housing project proposed for this area is South Epping with 950 new homes. The designation of EPP 4 and 9 (cycle route connections to the Town Centre - Un-costed) and EPP 19 (the new vehicular bridge over the railway within South Epping) as Essential is agreed. However, the designation of EPP 18, 23, 26-28 improvements to junctions and support for Ivy chimneys, Bridge

Street and Brook Road as Desirable fails to reflect the need to mitigate the impact of the new development on the roads and junctions already under considerable pressure.

Conclusion

The Local Plan describes a set of major changes to the town and parish of Epping: loss of facilities such as the sports centre and possibly the library, the replacement of part of the metropolitan green belt with a large expansion of the town (1300 new homes represents a growth of some 25% for Epping). Since the Local Plan was drafted, developments have been made regarding the St Johns Road site and the Town Council is confident that the sports centre can be re-provided on the St Johns site, so this should be enhanced and improved rather than lost; and the library may be relocated to alternative premises in the town. These would be extremely desirable outcomes for the town. The expansion of the medical facilities at Harlow could mean the loss of St Margaret's Hospital. The ongoing attraction of employment in London and the prospect of living in an attractive market town in delightful rural surroundings just 19 miles north from the centre of the capital gives little hope that the commuter congestion will ease in the foreseeable future.

If the Local Plan delivers new homes supported with adequate and appropriate infrastructure, Epping Town Council recognises that 1,300 new homes can be accommodated in the parish. Without revisions to the infrastructure investment proposals to support development and manage traffic in and around the Parish, the approach within the Local Plan will be un-sound and the focus of new housing should be re-directed to those parts of the District where infrastructure is proposed.

Annex A : traffic congestion and commuter parking

Para 3.84

An initial analysis of traffic growth across the District Work has shown that even without development in the future, parts of the highway network will be operating over-capacity, in some

cases by 2026 and in other cases by 2036. 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. Delays and queuing affect economic productivity, increase air pollution and can sever local communities.

Annex B: A summary of the Infrastructure Delivery Plan (ARUP December 2017) proposals for Epping

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|----------------------------|--------|-----------|--|----------------|
| Cycling | EPP 3 | Essential | Signs and road marking, Hemnall St Quietway | £1 – 2m |
| | EPP 5 | Essential | Signs and marking Shaftesbury Rd, Coronation Hill | £15k |
| | EPP 6 | Essential | Ditto Cottis Lane | £15k |
| | EPP 7 | Essential | Signs linking Hemnal St Quietway to Station | £15k |
| | EPP 8 | Essential | Segregated route on B1393 Tower Rd to Half Moon Lane | £300k |
| | EPP 10 | Essential | Link Kendal Ave to Epping / Ongar railway, to route alongside track | £250k |
| | EPP 11 | Essential | Links from Hemnal St Quietway to developments east and north of Epping | Unknown |
| Walking | EPP 29 | Desirable | Greenway footway connections | <u>Unknown</u> |
| | EPP 30 | Desirable | Greenway footway connections | <u>Unknown</u> |
| Public Transport | EPP 31 | Desirable | Improved bus facilities at Epping Station | £1m |
| B1393 Traffic Improvements | EPP 12 | Essential | Upgrade B1393 / Station Rd roundabout | £1m |
| | EPP 13 | Essential | Upgrade B1393 / St. Johns roundabout | £1m |
| | EPP 14 | Essential | Upgrade B1393 / Theydon Rd junction | £1m |
| | EPP 15 | Essential | Upgrade B1393 / Bury Lane roundabout | £1m |
| South Epping | EPP 4 | Essential | Cycle connection to S.Epping | Unknown |
| | EPP 9 | Essential | Connect Quietway – Addison Ct to Centre Drive | Unknown |
| | EPP 19 | Essential | New vehicular bridge over railway | £10m |
| | EPP 18 | Desirable | New road Ivy Chimneys, Bridge Hill, Brook Road | £3 – 10m |
| | EPP 23 | Desirable | Additional lance Bell common traffic lights | £2 – 3 m |
| | EPP 26 | Desirable | Ease traffic flows on Bridge Hill, Brook Road | Unknown |
| | EPP 27 | Desirable | Junction improvements at Bower Hill / Brook Rd and improved pedestrian route along centre Drive to town centre | £2 – 3 m |
| | EPP 28 | Desirable | Junction improvements Ivy Chimneys / Theydon Rd | £2 – 3 m |

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|----------------------------|--------|-----------|---|---------|
| Other Traffic Improvements | EPP 16 | Essential | Thornwood Rd signals (basic) | £1m |
| | EPP 17 | Desirable | Thornwood Rd signals (full scheme) | £2 - 3m |
| | EPP 20 | Desirable | Improvements Fiddlers Hamlet | £1m |
| | EPP 21 | Desirable | B181 Traffic management | £1m |
| | EPP 22 | Desirable | Rye Hill Rd traffic management | £1m |
| | EPP 24 | Desirable | Real-time road signage / traffic management | £0.5m |
| | EPP 25 | Desirable | Pedestrian priority on streets between High Rd and Hemnal St and traffic calming Kendal Ave | Unknown |
| | EPP 32 | Desirable | New signage to M25 / M11 | £0.5m |

Annex C Cycle Action Plan / Strategy Nov 2016

Acknowledges a decline in cycling in Essex 2001 – 2011.

Aims and Monitoring include

- Increase (un-specified) cycling 2011 – 2021
- Double the number of trips (no baseline) 2014-2025
- Reduce (un-specified) car use for trips less than 3 km
- Increase (un-specified) cycling to school
- Review level of cycle usage to access stations

Proposals include

- Quietways
- Segregation for motor vehicles and pedestrians
- New signalling for cyclists
- Cycle-friendly roundabouts
- Coloured surfacing on carriageways
- 20mph speed limits
- Cycle networks
- Cycle parking at key destinations
- New housing to have secure cycle storage

Cycling prioritised over motorised transport in all new developments