

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

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Our ref: JP16

Dear Amanda,

EPPING FOREST DRAFT LOCAL PLAN CONSULTATION

Thank you for giving the Mayor of London the opportunity to comment on your draft Local Plan.

Epping Forest sits within the 'London – Stansted – Cambridge – Peterborough' Corridor extending from north London through Hertfordshire and Essex. These corridors are set out in Policy 2.3 of the London Plan for the strategic coordination of planning and investment. We are therefore pleased to work closely with the Council on the London – Stansted – Cambridge Consortium promoting the benefits of development and investment across the Corridor.

In the light of good access to the M11 and M25 motorway, it may also be useful to understand specifically the Council's consideration of land for industry and logistics in the context of related requirements for the wider area.

The strategic collaboration arrangements with authorities in East Hertfordshire, West Essex and adjoining London boroughs on the Cooperation for Sustainable Development Board are also recognised as good practise. The documentation from the meetings is valuable and provides insight into the strategic planning process/issues across a range of local planning authorities close to London's boundaries. It has been agreed that the GLA will attend one of the next meetings – this will also provide an opportunity for the West Essex / East Herts authorities to engage directly on the preparation of the review of the London Plan.

The approach to housing need set out in the West Essex / East Hertfordshire Strategic Housing Market Assessment (SHMA) is welcomed, in particular the use of a 10-year historic migration trend. The development of a draft Memorandum of Understanding (MoU) on the Distribution of Objectively Assessed Need (OAN) across the Housing Market Area (HMA) with Uttlesford, Harlow and East Hertfordshire Districts is also welcomed. The involvement of the relevant County Councils and the Highways England is considered valuable. However, as the MoU sets a combined housing capacity figure of 51,000 homes over the Plan period, i.e. below the figure of 54,000 homes informed by the most recent population and household projections, the Council may wish to reassure itself that it is addressing housing need in accordance with NPPF requirements.

From a strategic transport perspective – based on current modelling data – Transport for London (TfL) does not believe that Central Line capacity should act as a deterrent to planned growth in the draft Local Plan. For further details on transport, please see TfL's response included as Annex 1.

If you would like to discuss the strategic matters raised above further, please contact Jorn Peters

Yours sincerely



John Lett
Senior Manager – London Plan

cc: National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Annex 1 – Detailed Response by Transport for London

Vision for the London Stansted Cambridge Corridor Core Area

TfL welcomes the incorporation of this vision in the Local Plan, specifically the reference to ‘maximising the opportunities that Crossrail 2 can deliver’

Transport Policy T1 and 4.80 - Central Line capacity

In 2012, responding to the Issues and Options consultation TfL previously provided the following comment on options for growth and distribution of development in relation to Central Line capacity:

the Central Line has a shortfall in capacity westbound into the City in the AM peak. Additional demand on trains from the east of the line would still be able to board trains but the impact would have knock-on impacts on inner London users who would have longer wait times for trains that they are able to board. Until Crossrail opens, it will not be possible to know the true impact of crowding relief on the Central Line.

Since 2012 further modelling work has been carried out to understand the likely impacts of Crossrail (now renamed the Elizabeth Line) on Central Line crowding. More detailed information on expected growth and trip generation has been used. The modelling indicates that there will be an overall reduction in Central Line trips and that those trips will be redistributed. Although there will be continued growth from the east into Stratford there will be reductions in trips in the central area where crowding is greatest. The Elizabeth Line is due to open in stages and will be fully open in December 2019. On the basis of current modelling data, TfL does not believe that Central Line capacity should act as a deterrent to planned growth in the Draft Local Plan (or any of the alternative models for distributing growth which might concentrate a higher proportion of growth within Epping Forest District into the Central Line corridor).

TfL also stated in 2012 that

in regards to station capacity, some have low levels of entry and exit capacity at the gate line and ticket hall. In some circumstances, additional trips generated by the proposed growth may facilitate the need for increases.

However as noted at the time, the scale of development proposed in the Local Plan would likely warrant incremental change rather than a complete overhaul of existing facilities and that this could best be addressed through the use of CIL or section 106 contributions towards station access and capacity improvements as part of the negotiations on specific large development proposals. 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

Transport Policy T1 and 4.80 - Central Line station parking

In relation to car parking at Central Line stations in 2012 TfL previously stated that

TfL owns a number of Central Line car parks within Epping Forest, and TfL would not be opposed to expansion of car parks at these locations in order to increase capacity. However, in order to tackle issue of overspill car parking, there is no single solution and as such Epping Forest District Council should adopt an integrated approach towards discouraging excessive car parking.

Since that response has been submitted TfL has started reviewing a number of sites it owns as part of wider plans to address London’s critical need for affordable housing and generate income to reinvest in the transport network. This includes a number of sites at Central Line station car parks. TfL will continue to engage with the local authority to understand what options may exist for these sites as part of the Epping Forest District Council Local Plan. As stated, a separate response will be submitted by TfL Property reflecting TfL’s interests in these sites as a landowner and potential developer.

A range of measures should be considered to both control on street parking and to encourage alternative means of access to stations. Any future applications affecting car parking capacity in the vicinity of Central Line stations should be subject to full consultation with TfL.

Transport Policy T1 and 4.80 - Central Line extensions

It should be noted that none of the suggested extensions to the Central Line listed in 4.80 are being actively investigated by TfL/London Underground.

Transport Policy T1, 4.84 and 4.89 – Car Parking Standards

Epping Forest is adjacent to a number of London boroughs and benefits from public transport routes that cross the London boundary. TfL supports a restraint based approach to car parking within London boroughs as set out in the London Plan. Parking policies within Epping Forest should take account of the potential for cross boundary journeys and be designed to encourage sustainable travel options and minimise additional car trips for travel across the London boundary. This will be particularly relevant for growth areas or large development sites on cross boundary routes. TfL supports the intention to require electric vehicle charging points to be provided.

Transport Policy T2 – Safeguarding of Routes and Facilities

TfL welcomes the commitment to protect land which is required for proposed transport schemes from developments which would prevent their proper implementation, and the specific references to Network Rail and Transport for London Investment Strategies in this policy