



Date: 29th January 2018

Local Plan Regulation 19 Representation
Planning Policy
Epping Forest District Council
Civic Offices
323 High Street
Epping

By email

Commercial Development

Transport for London
3rd Floor Wing Over Station
55 Broadway
London
SW1H 0BD

Phone: 020 7126 4468
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Dear Sir/Madam,

RE: Epping Forest District Local Plan, Submission Version consultation

Thank you for consulting Transport for London (TfL) on the Epping Forest District Local Plan Submission Version. The following comments represent the views of officers in TfL Commercial Development Planning Team (TfL CD) in its capacity as a significant landowner and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London.

TfL CD has been set an ambitious target by the Mayor to commence the development of 10,000 new homes in London by 2021; at least 50% of these new homes must be genuinely affordable. TfL CD has identified a number of sites in the borough with the potential for residential led, mixed-use development which could make a significant contribution towards meeting borough and TfL housing targets.

Whilst we appreciate that the Regulation 19 stage of the consultation calls for comments on the legality and soundness of the Local Plan, we would like to take this opportunity to comment on a number of matters, as outlined below.

Policies

Policy H1 Housing Mix and Accommodation Types

The commitment to provide a mix of dwelling types, sizes and tenures is welcomed. However, we note that the policy does not mention the role that Private Rented Sector (PRS) can play in addressing housing needs. As such we would suggest that Policy H1 includes the commitment to encourage PRS where appropriate within the borough.

Policy SP 3 Density

The commitment to make the best use of efficient land through (*inter alia*) expecting greater density of development at places with good transport accessibility is welcomed. The draft Mayor's Transport Strategy (MTS) sets out that land around stations provides opportunities to create high density development, and that opportunities for development at land around stations should be explored. Given the particular characteristics of the boroughs tube stations, we would suggest that a particular onus is placed on focusing the greatest density of development at places with good transport accessibility, and particularly around stations.

Parking

The proposal to develop specific residential car parking standards for Epping Forest District Council is welcomed, as this will enable a more locally focused approach to be developed, that better reflects the high public transport accessibility of many sites in the District. The commitment to seek reduced car parking, including car free development, where practicable and within 400m of a railway station is particularly welcomed. The TfL car parks at stations are highly sustainable sites that would be well suited to car free or reduced car parking residential led development.

Site Allocations

EPP.R3 Epping London Underground car park

TfL CD strongly supports the draft allocation of the site as a housing led redevelopment site. The site is a well contained underutilised site with excellent transport accessibility and should therefore be a focus for growth. TfL supports the suggested approach of producing a Development Brief for the site prior to a planning application being submitted and would wish to be involved in its preparation.

We note that the draft allocation includes the approximate capacity for 89 homes, which equates to an indicative net density of 83 dwellings per hectare. High level feasibility studies for this site indicate that a decked design could allow a greater density to be achieved on the site whilst still providing a compatible and neighbourly form of development. Given the above, the central and accessible location of the site, we consider that the 89 home figure is conservative and should be revised upwards, and at the very least represents the absolute minimum amount of homes that the site should be expected to bring forward.

Please refer to our general comments below regarding restrictions on residential parking.

LOU.R1 Loughton London Underground car park

TfL CD strongly supports the draft allocation of the site as a housing led redevelopment site. Similarly to Epping, the site is a well contained underutilised site with excellent transport accessibility and should therefore be a focus for growth.

We note that the draft site allocation boundary includes operational land to the south which would not be able to come forward for redevelopment within the lifetime of the plan. The attached plan therefore includes a revised southern boundary which excludes this land.

Immediately to the north of the car park lies another surface car park belonging to the adjacent Sainsbury's supermarket site. TfL considers that there is merit in including this adjacent car park within the wider car park redevelopment site. This would potentially allow a more coherent site-wide masterplan to be developed. Consideration to the retention of supermarket customer car parking would need to be included in an allocation which includes this northern car park.

The redevelopment of the Sainsbury's car park would likely require a shared access across and through the TfL site. This adjacent car park could therefore complement the redevelopment of the TfL car park, but would likely be suitable as a separate development parcel. The TfL car park could come forward for redevelopment with or without this additional land.

Please refer to our general comments below regarding restrictions on residential parking.

LOU.R2 Debden London Underground car park

TfL CD strongly supports the draft allocation of the site as a housing led redevelopment site. Once again, the site is a well contained underutilised site with excellent transport accessibility and should therefore be a focus for growth. TfL supports the suggested approach of producing a Development Brief for the site prior to a planning application being submitted and would wish to be involved in its preparation.

We note that the draft allocation includes the approximate capacity for 192 homes, which equates to an indicative net density of 129 dwellings per hectare. High level feasibility studies for this site indicate that a decked design could allow a greater density to be achieved on the site whilst still providing a compatible and neighbourly form of development. Given the above, the central and accessible location of the site, we consider that the 192 home figure is conservative and should be revised upwards, and at the very least represent the absolute minimum amount of homes that the site should be expected to bring forward.

Please refer to our general comments below regarding restrictions on residential parking.

BUCK.R2 Queens Road car park

TfL CD strongly supports the draft allocation of the site as a housing led redevelopment site. As with the other TfL sites above, the site is a well contained underutilised site with excellent transport accessibility and should therefore be a focus for growth. TfL supports the suggested approach of producing a Development Brief for the site prior to a planning application being submitted and would wish to be part of its preparation.

We note that the draft allocation includes the approximate capacity for 41 homes, which equates to an indicative net density of 97 dwellings per hectare. High level feasibility studies for this site indicate that a decked design could allow a greater density to be achieved on the site whilst still providing a compatible and neighbourly form of development. Given the above, the central and accessible location of the site, we consider that the 41 home figure is conservative and should be revised upwards, and at the very least represent the absolute minimum amount of homes that the site should be expected to bring forward.

TfL CD is aware that the owners of two adjacent residential properties, 16 Forest Edge and 7 Briar Close, have expressed the desire to have portions of their rear gardens included within the draft BUCK.R2 allocation. Notwithstanding that, residential gardens are excluded from the NPPF definition of previously developed land. Should these two areas set out above be included within the draft site allocation BUCK.R2, this would enable a larger parcel of land to be brought forward for residential development which could enable additional units/and or ancillary open space to be provided. We would therefore be supportive of this approach. However any allocation would need to be clear that this is additional land outside of TfL's ownership which could complement a redevelopment of the car park, and that the existing car park could come forward for redevelopment with or without this site.

Please refer to our general comments below regarding restrictions on residential parking.

THYB.R2 Theydon Bois London Underground car park

TfL CD strongly supports the draft allocation of the site as a housing led redevelopment site. The site is a well contained underutilised site with excellent transport accessibility and should therefore be a focus for growth. TfL supports the suggested approach of producing a Development Brief for the site prior to a planning application being submitted and would want to be involved in its preparation.

We note that the draft allocation includes the approximate capacity for 12 homes, which equates to an indicative net density of 40 dwellings per hectare. High level feasibility studies for this site indicate that a decked design could allow a greater density to be achieved on the site whilst still providing a

compatible and neighbourly form of development. Given the above, and the central and accessible location of the site, we consider that the 12 home figure is conservative and should be revised upwards, and at the very least represent the absolute minimum amount of homes that the site should be expected to bring forward.

Please refer to our general comments below regarding restrictions on residential parking.

Car Parking: All Sites

With regards to car parking arrangements at all five of the sites detailed above, we welcome the approach that proposals for residential development should limit the provision of on-site residents' car parking to that required to service the essential needs of the development. This is in line with the MTS which strongly advocates for residential car parking to be restricted. We would suggest therefore that the allocation includes a commitment to explore car free residential development, provided that it is demonstrated that there would be no harmful impact on street parking or other services that could not be mitigated.

Concluding Remarks

We trust that the above and the enclosed is in order. Considering our comments regarding the draft site allocations, we would welcome a meeting with yourselves to discuss this matter further.

In the meantime we would appreciate if you could confirm receipt of this letter. Should you have any queries, please do not hesitate to call me on 020 7126 4468.

Yours faithfully

Jonathan Woolmer

Principal Planner, Commercial Development

Cc:

Patricia Cazes-Potgieter, Planning Development Manager, Commercial Development

Loughton

TfL Ownership at
Loughton Station
Car Park

January 2018

(Red Line)

(Excluding London
Underground
operational areas)

