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Dear Sir / Madam,

**RE: EFDC Consultation on Main Modifications to the emerging Local Plan**

Thank you for providing the opportunity to comment on the Main Modifications to the new Epping Forest Local Plan.

Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

**MM78 (Policy P1); MM80 (Policy P2); MM114; MM116; MM117; MM127; MM128 and MM129**

In the 'Inspector's advice after hearing' report the following actions were included relating to site allocations LOU.R1 and LOU.R2, which are two sites within TfL ownership:

*ACTION 17: To prepare MMs to impose a height limit upon developments the London Underground car park sites.*

*ACTION 18: To agree a Statement of Common Ground with TfL to give confidence that sites LOU.R1 and LOU.R2 are deliverable as proposed in the Plan; or to delete these allocations via a MM.*

Following this EFDC sent a letter to TfL CD in October 2019 requesting a response to the following questions:

*ACTION 1: To discuss and agree the extent of the red line site area for site LOU.R1*

*ACTION 2: To clarify whether sites LOU.R1 and LOU.R2 are deliverable at their current scale and quantum of development as envisaged by EFDC's Submission Version Local Plan 2017. To discuss any potential issues of viability with the Council*



*and agree whether or not to continue promoting these two sites in the Local Plan as currently proposed or whether they should be deleted.*

*ACTION 3: To understand your position with respect to the proposed modification to the Local Plan that would set height limits on development to London Underground car park sites.*

TfL CD provided a response which included the following summary:

*Realistic abnormal costs have not been factored into the Council's viability assessment. The main abnormal costs on the car park sites are associated with providing a decked or multi-storey car park to ensure that the existing levels of commuter car parking can be retained. If the site allocations significantly reduced the number of commuter car parking spaces that were required to be retained on TfL car park sites, particularly at LOU.R1 and LOU.R2, it may enable viable development to come forward at a density and height more in line with those envisaged by the Council (although this would need to be subject to viability assessment). We are willing to work with the Council to see if there is any way that a deliverable scheme could be delivered.*

TfL CD note that the site allocations LOU.R1, LOU.R2 and EPP.R3 are now being suggested for removal from the Local Plan. It is understood that the reason for the removal of these sites is predominately to do with the heights likely to be required to make development viable which is a result of the site allocations requiring development to accommodate the re-provision of all existing car parking spaces. As set out in TfL CD's previous response to EFDC mentioned above the complete re-provision of parking results in a multi-storey carpark or podium level being required that adds several storeys onto the building height and which means additional height is required to help offset the significant cost associated with the parking infrastructure. However, having looked through the council's evidence base there does not appear to be any specific evidence that these car parks are being used to full capacity and as such would warrant a requirement for complete re-provision of the existing car parking spaces.

LOU.R1, LOU.R2 and EPP.R3 are highly sustainable locations which would provide new residential development in close proximity to local facilities and sustainable transport networks, thus reducing the need for people to travel. The reduction of existing car parking in a responsible and informed manner would also help to achieve a more sustainable outcome. This would be very much in line with national policy and the aspirations of the Council, including the following:

- 'EFDC sustainability guidance and checklist/Major development' states the following (underline emphasis added):

*Development should minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the*



*transition to a low carbon future. New proposals must futureproof for change in travel habits, including reallocating parking and road space, innovation in travel technology, last mile deliveries and electric charging. Masterplanning for sustainable movement should address: walkable low-traffic neighbourhoods, sociable streets and placemaking; cycling, walking and public transport network; behaviour change programmes; rebalancing car use and parking design (including carpooling and car sharing) and availability; futureproofing with adaptable technology; deliveries and servicing; and construction impacts.*

- Policy T1 of the Local Plan encourages a modal shift, in particular it indicates that the Council will:

*(ii) promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent, safe, attractive and direct cycling and walking networks to provide create a genuine alternative to the car private vehicles and facilitate a modal shift;*

- The Sustainability Appraisal June 2021 notes on pg. 5 that a council objective is to 'Bring about a modal shift in terms of commuting patterns, away from car dependency.'

- The NPPF paragraph 105 states:

*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.*

- The NPPF also highlights in paragraph 120 (d) that planning policies should (underline emphasis added):

*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).*

This issue on parking has been raised in a number of conversations between TfL CD and EFDC. A more proactive response from the council would have been to require a car parking survey of each of the sites to identify the extent to which they are being used, which could be undertaken at the time of preparing a planning application. There could also have been an acknowledgement in the site allocations that some reduction in car parking would be entertained regardless of car park use given the need for mode shift and given the sustainable nature of the sites. The removal of car parking does not need to mean an unacceptable impact on the local road network in terms of displaced parking if other measures are taken alongside, such as an increased focus on sustainable transport options



and controlled parking zones.

In addition, Epping Forest has large areas of Green Belt which should only be considered for development in exceptional circumstances, and so all opportunities for development on brownfield sites should be exhausted first in line with paragraph 119 of the NPPF which states:

*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.*

TfL CD consider that EFDC have not proactively sought to seek a solution to address the issue that has been raised with regard to the full re-provision of the existing car parking in order to unlock these highly sustainable brownfield sites.

## **Concluding Remarks**

We hope that these representations are helpful but if you require any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me.

Yours faithfully,

Daniel Fleet

**Assistant Planner, Transport for London Commercial Development**