

**EPPING FOREST DISTRICT COUNCIL: Examination of the District Local Plan, 2011 – 2033.**

**Essex County Council (19STAT0024) Examination Hearing Statement**

**MATTER 4: The Spatial Strategy/Distribution of Development**

<b>Issue 3</b>	<i><b>Is the distribution of employment land in the Plan justified in light of the distribution of housing?</b></i>
<b>Question 1</b>	In light of the housing growth proposed around Harlow, does the Plan's proposal to locate the majority of employment land at North Weald Bassett and Waltham Abbey risk creating unsustainable travel to work patterns? How will this be avoided? (Reps Harlow DC).

1. The most relevant FEMA economic evidence (West Essex and East Hertfordshire Assessment of Employment Needs (Final Report, October 2017) assessed total jobs needs for the FEMA area, each district's own required job creation and accordingly the individual district employment land needs (non-spatially). This did not deal with wider, cross-boundary issues and the likely new job requirements for Harlow and Gilston Garden Town in particular. The latter have particular importance given the economic and sustainability issues and aspirations for the Garden Town. It is recognised that Economic Development assessment work on this issue remains outstanding and this is to be commissioned soon by the HGGT project partners. This may provide clarity as to whether sufficient employment is planned within the garden town area in order to deliver garden town sustainability aspirations, including reducing the need to travel, reducing travel distances and achieving a step-change in active/sustainable travel behaviour.
2. Similarly, the agreed WEEH employment MOU does not address the cross-boundary matters. It is understood that Harlow Council is planning to meet the jobs growth and economic needs of its own district-level population growth, in line with its own FEMA / district-based FEMA economic assessment findings.
3. The potential spatial mismatch of new homes and new jobs is likely to have sustainability (including transport) implications. The strategic transport modelling work carried out by ECC assessed the impacts of 16,100 new homes for HGGT. This work (and its findings that it would be possible to accommodate the LPSV growth planned for the Garden Town strategic sites located in EFDC area) was predicated on achieving the required ambitious 60% modal shift in favour of sustainable modes. This included assumptions that travel to work trips (these being a significant element

of reasons to travel and volume of trips) would be enabled on a local basis, thus internalising many trips within the garden town, which could then be made using the new sustainable travel infrastructure and services proposed for Harlow's network (for instance east:west and north:south Sustainable Travel Corridors (STC)). If many work trips instead involve travel further afield (beyond Harlow) and therefore are more likely to be made by car, the impacts on the Harlow transport network are likely to become unmanageable and could serve to undermine achieving the success of the Garden Town more widely.

4. This spatial mismatch may also impact on other settlements within EFDC area, particularly Epping town, which already experiences significant peak and off-peak traffic congestion. This might arise, for example, from increased numbers of trips made by new Garden Town residents driving to Epping to access the London Underground for travel into London. Provision of additional employment opportunities at North Weald Bassett may not facilitate more sustainable travel, particularly as deliverable sustainable travel solutions to reduce its impacts on the highway network, particularly Epping town, have yet to be identified.
5. EFDC is aware of the ambitious but challenging Garden Town sustainable travel targets issue and its importance. Equally, EFDC is aware that this requires a comprehensive planned package of transport interventions and measures. Along with the SHMA-wide MOU on distribution of objectively assessed housing needs (which sets out the agreement of locating 16,100 homes at Harlow), EFDC is also a signatory to the MOU on Highways and Transport infrastructure. These MOUs encapsulate the collective key agreements around spatial growth and the shift towards sustainable/active travel that is recognised as necessary. However, ECC suggests that a spatial response to these issues, through the Local Plan, needs further consideration. ECC has raised issues in its representations on the spatial alignment and relationships of planned growth, the economic strategy and employment provision. This could potentially take the form of a review of the economic strategy for the LPSV, as this does not appear to be articulated clearly and in turn, potentially employment land provision / location.
6. ECC remains concerned about the distribution / local supply of new jobs, particularly within the strategic sites around HGGT, where the employment forecast analysis appears to fall some way short of the Town & County Planning Association (TCPA) aim of offering no less than one job per new household within a garden town (Garden City Myth-Buster: a short guide to myths and truths about creating new Garden Cities, Town and County Planning Association, Sept 2014).

## MATTER 4: The Spatial Strategy/Distribution of Development

Issue 6	<i>Is the distribution of development justified in respect of its effect upon transport and other infrastructure in the District? Will the Plan be effective in securing the infrastructure necessary to support proposed growth?</i>
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Transport: Question 1	Have the transport impacts of the Plan as a whole been tested? Has all necessary mitigation been identified and is there confidence that it can be delivered in time to support the proposed growth? Are there any remaining uncertainties or shortcomings?
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### Assessments

1. Extensive strategic and local junction transport modelling has been undertaken as part of the transport evidence base.
2. The wider Harlow 'VISUM' strategic assignment model has been used by ECC, on behalf of the West Essex and East Herts Districts, to appraise the wider highway impacts and cumulative impacts of the East Herts, Epping Forest and Harlow Local Plans growth, centred on Harlow and the strategic sites adjacent to it. The VISUM model has been validated to WebTAG standards and is therefore considered a robust tool with which to identify the extent of impacts, infrastructure and mitigation required to support the Local Plans development and that of Harlow and Gilston Garden Town (HGGT). The model has also been approved by Highways England as an acceptable tool for use in evaluating a range of planning scenarios during preparation of these Local Plans.
3. Documentation on the wider Harlow VISUM model validation and forecasting is included as part of the transport assessment outputs [TN1-7].
4. The EFDC Local Plan Highway Assessment report (Ringway Jacobs 2017, ref. EB502) makes use of outputs from the Harlow VISUM model to assess impacts on the key highway network and settlements within the District, excluding the strategic sites around Harlow.

### Impacts and Findings

5. The findings of the VISUM modelling established that while ~16,000 homes and ~12,000 jobs could be accommodated within HGGT, this will require a major step-change in active/sustainable travel, to not only deliver the principles of a garden town, but also to ensure that unacceptable congestion does not result on the local

and strategic highway network. In addition, some highway capacity improvement schemes and extensive sustainable travel capacity improvement schemes have also been identified.

6. The WEEH Highways and Transportation Infrastructure MOU, February 2017, sets out the issues and identified the need for key strategic infrastructure, including a new junction on the M11 - Junction 7a, and improvements to M11 Junction 7. If new Junction 7a is not delivered, then a major scheme is required at Junction 7. Improvements to the A414 corridor, to the A1025 Second Avenue corridor, widening of the existing A414 Fifth Avenue central river Stort crossing, and a new eastern river Stort crossing would all help to mitigate some highway impacts, while also facilitating delivery of sustainable transport corridors north:south and east:west across the garden town.
7. As stated in EFDC IDP Part A, 5.1.1, *“All growth locations in Harlow would increase the need for major intervention to improve access to the M11 highways network, however growth to the East of Harlow is particularly reliant on the provision of J7a.”* It should be noted that further growth at the Harlow Enterprise Zone is conditionally capped (see London Road North Local Development Order and associated Highways Agency SoCG, extracts copied below) due to the lack of capacity at M11 J7, further supporting the assertion that a major strategic scheme is required at either J7 or new J7a to enable Local Plans growth to take place.
8. It should be noted that, while funding and planning permission have been secured, delivery of new M11 J7a is not yet assured.
9. ECC has suggested that the wording of Policy SP5.3, and other policies relating to the strategic sites around Harlow, be amended to reflect the position that M11 J7a (or a major improvement at J7) and the Sustainable Transport Corridors, plus developer contributions towards these, are required in order to enable development within and around Harlow. ECC and EFDC are working towards an agreed text/overarching statement to this effect.
10. There is also concern (raised in an ECC representation) about the deliverability of some potential highways improvements from Epping through to the M25, in view of current and future trip volumes, which affects the Forest area in particular. ECC understands that work on this is ongoing.

### **Background info – Harlow Enterprise Zone Local Development Order**

#### **Enterprise Zone Local Development Order (EZLDO)**

[<http://www.harlow.gov.uk/sites/harlow-cms/files/files/London%20Road%20North%20Order%20and%20Schedule.pdf>]

#### **EZLDO Condition PDH11 Appendix J Land**

No development shall be begun under Schedule A or Schedule B of the Local Development Order on any land shaded red on Appendix J until a new junction on the M11 to the east of Harlow (Junction 7a) has been completed and made available for use.

Reason: To ensure enterprise zone development is phased to take account of the transport assessment undertaken and the modelled impact of development on junction 7 of the M11.

Note: See informative INF6 for further information.

#### **EZLDO INF6 – Phasing condition PDH11 and Junction 7a**

It is understood that the Highways Agency will not oppose a release of condition PDH11 pursuant to Section 73 where it can be demonstrated that sufficient spare highways capacity exists at Junction 7 because of one or more of the following reasons:

1. the monitoring of Enterprise Zone development across Harlow by the Local Planning Authority has demonstrated that a less transport intensive form of development has been developed such that the net transport impact of the development is lower than the 5,899 net new jobs originally anticipated within the Harlow Enterprise Zone area to the extent that sufficient spare highways capacity exists on Junction 7 of the M11 to allow development on land shaded red on Appendix J to be begun; and/or
2. the monitoring of travel planning measures undertaken within the Enterprise Zone and/or within other areas of Harlow has demonstrated that sufficient spare highways capacity exists on Junction 7 of the M11 to allow development on land shaded red on Appendix J to be begun; and/or
3. an alternative scheme of highway improvement works to Junction 7 of the M11 has been implemented has delivered the agreed additional highways capacity at Junction 7 such that development on the land shaded red on Appendix J may be begun.

Highways Agency, Statement of Common Ground, London Road North and London Road South, May 2013 [[http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/London%20Road%20North%20Statement%20of%20Common%20Ground%20-%20Highways%20Agency\\_0.pdf](http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/London%20Road%20North%20Statement%20of%20Common%20Ground%20-%20Highways%20Agency_0.pdf)]

## MATTER 4: The Spatial Strategy/Distribution of Development

### Transport: Question 2

Is planned growth dependent upon a “step-change” towards sustainable travel? What does this mean and how will the Plan facilitate it? What has been done to assess the need for increased public transport and how will this be provided? How will success be monitored?

11. Within HGGT, delivery of key sustainable transport infrastructure and achievement of a significant step change in sustainable and active travel for both existing and new residents, workers and others **is key** to achieving sustainable growth and other garden town principles. As such it is vital to plan and deliver growth to reduce the need to travel and to make sustainable and active travel the best and most acceptable choices. Reducing the need to travel can be supported by ensuring that residents’ needs are met as close as possible to their homes, or can be easily reached via safe and attractive alternative means of travel, i.e. walking, cycling and public transport.
12. As part of the response to this, more recently, the HGGT partners have agreed to jointly develop a HGGT Transport Strategy. Work to develop and endorse this is still in its early stages but this is seen as an important action and means of facilitating the step change towards sustainable travel.
13. TCPA guidance states that *“A Garden City’s design must enable at least 50% of trips originating in the Garden City to be made by non-car means, with a goal to increase this over time to at least 60%”* (Garden City Standards for the 21<sup>st</sup> Century, Practical Guides for creating successful new communities, Guide 3, Design and Masterplanning, TCPA, Dec 2017). This is the basis for the HGGT ambitions to achieve a step-change in travel behaviour. The HGGT accepts and endorses the need to achieve this change in favour of sustainable travel.
14. See also response to Matter 4, Issue 3, Question 1 regarding employment distribution.
15. The LPSV states at paragraph 1.35 that *“around half of the district’s working residents commute out of the district for work”* and at paragraph 1.36 that *“the majority of people who commute into the district come from Harlow (and Redbridge)”*. At paragraph 1.38 it states that *“District residents most commonly travel to work using a car or van”*. All these factors demonstrate that it is essential to provide or facilitate a reduction in the need to travel, reduced journey lengths and improved sustainable connections to key attractors, including bus, rail and underground stations, education, employment and retail areas. This applies

throughout the District but particularly for the strategic sites around Harlow, given the need to deliver a sustainable garden town.

16. In response to the LPSV (EFDC ref 5) ECC recommends that a specific response is required in terms of addressing commuting, such as employment land provision / economic strategy, and sustainable travel measures. This could potentially be addressed by allocating additional employment provision for the Harlow strategic sites, within Policy SP 4 and SP 5. ECC also recommends adding a reference to paragraph 1.38 for effective implementation, through approaches explored in DfT's 'Smarter Choices'. See: <https://www.gov.uk/government/publications/smarter-choices-main-report-about-changing-the-way-we-travel>
17. EFDC proposes (since LPSV submission) a change to the effect that in the region of 1,200 new jobs in the vicinity of HGGT might be achieved, through regeneration and intensification, of an existing employment site (at Latton Priory), as well as a local centre and education employment opportunities. However, it is not likely that this would result in as many as one job per home within easy and sustainable commuting distance for all EFDC located HGGT developments. ECC considers that it will be more problematic to achieve the garden town levels of sustainable travel as a result.
18. The transport assessment of the rest of the district, as reported in the emerging draft Transport Assessment Report (TAR), indicates significant existing levels of congestion which will be exacerbated by committed and LPSV growth. To address this an assumption has been made that improved levels of sustainable travel will be delivered by the Plan, and so will reduce the highway impact of growth by 15-22%. However, the TAR does not detail the assumed "*reasonable sustainable transport improvements*" and ECC is concerned that insufficient emphasis has been placed on this element of the Plan and how it would be delivered.
19. In addition to the anticipated uplift in sustainable travel, it is assumed (in the TAR) that further mitigation will result from travel behaviour change, with car journeys taking place either later or earlier than the traditional peak hours, 'peak spreading', to avoid congestion. However, no specific reporting on the shoulder hours has been presented so it is not clear how existing travel behaviour differs and whether there is spare network capacity at other times as a result. It is therefore uncertain to ECC whether the assumed reduction in peak hour travel could be achieved.