
QUINN ESTATES

PROPOSED DEVELOPMENT AT THE FORMER NORTH WEALD GOLF COURSE

EPPING FOREST DISTRICT LOCAL PLAN EIP

MATTER 13 - TRANSPORT

APRIL 2019

1.0 Introduction

- 1.1 Connect Consultants Limited is a firm of specialist highways, traffic and transportation planning consultants that has been instructed by Quinn Estates Limited in respect of their and Redrow's planning application for a mixed-use development on the former North Weald Golf Course, Land North and South of the A414, North Weald Bassett (planning reference EPF/1494/18).
- 1.2 The development site, known as North Weald Park, is in Epping Forest District.
- 1.3 Quinn Estates is preparing hearing statements to be submitted as part of the Examination in Public (EIP) of Epping Forest District Council's (EFDC's) emerging District Local Plan 2011-2033.
- 1.4 The Planning Inspector has raised two issues relating to transport in her *Inspector's Matters, Issues and Questions* document. In that document, Matter 13 deals with the two transport issues.
- 1.5 Connect Consultants has been instructed to prepare representations responding to Matter 13, with specific reference to the proposed North Weald Park development.
- 1.6 This document addresses the Inspector's two transport issues and associated questions in turn.

2.0 Inspector's Matters, Issues and Questions

- 2.1 This section sets out the two issues under *Matter 13: Transport*, and provides responses to each of the associated questions, with specific reference to the proposed North Weald Park development.

Matter 13: Transport

Issue 1: Has regard been had to the Mayor of London's draft Transport Strategy and London Plan in proposing Policy T1; and are its provisions clear and effective?

Question 1: Does this policy take account of the strategic transport objectives in the Mayor of London's draft Transport Strategy and London Plan? Would the policy support the objectives of these documents in respect of transportation and have any specific conflicts been identified? (Reps TfL).

The Mayor's Transport Strategy, March 2018

- 2.2 The Mayor's Transport Strategy (MTS) includes a number of strategic objectives, which are addressed through 26 policies.
- 2.3 MTS Policy 1 seeks to reduce the dependency on cars in favour of active, efficient and sustainable travel modes.
- 2.4 MTS policies 2-9 address the Healthy Streets and healthy people objective.
- 2.5 Policies 10-20 focus on achieving a good public transport experience.
- 2.6 Policies 21 and 22 relate to new homes and jobs.
- 2.7 Policies 23-26 relate to delivering the vision.

Draft London Plan

- 2.8 The Draft London Plan (DLP) includes a number of transport policies within its *Chapter 10: Transport*.
- 2.9 **DLP Policy T1 Strategic approach to transport** sets out that,
"All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes..."
- 2.10 It aims to achieve this by integrating land use and transport so as to reduce dependency on the car, in favour of active and space-efficient travel.
- 2.11 **DLP Policy T2 Healthy Streets** focusses on the Healthy Streets approach which aims to improve the health of Londoners by increasing their use of active travel and public transport through high-quality, pleasant and attractive environments.
- 2.12 **DLP Policy T3 Transport capacity, connectivity and safeguarding** sets out in part E that,
"Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed."
- 2.13 **DLP Policy T4 Assessing and mitigating transport impacts** sets out the requirement for development proposals to be supported by Transport Assessments to ensure that any impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 2.14 It states that,
"Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address any adverse transport impacts that are identified."
- 2.15 **DLP Policy T5 Cycling** requires development proposals to help remove barriers to cycling and to create a healthy, cycling-friendly environment.

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- 2.16 It requires developments to support improved cycle routes and infrastructure, and to provide appropriate levels of cycle parking.
- 2.17 **DLP Policy T6 Car parking** sets out the policies for car parking provision. It states that car parking provision should be in line with the levels of existing and future public transport availability, and that maximum standards should be set. Development proposals should include appropriate provision of disabled parking, and infrastructure for electric or other Ultra-Low Emission vehicles.

Response to Inspector's Issue 1, question 1

- 2.18 Although Epping Forest District includes the north-eastern end of the Central line and some TfL bus routes, many of the Mayor of London's considerations are not directly transferable to the EFDC Local Plan because many parts of the district do not share the same characteristics as the parts of London on which the Mayor's objectives are focussed.
- 2.19 Irrespective of where future development is located within EFDC, it will be of no detriment to the Mayor's transport-oriented approach because journeys to/from central London will be made through the London transport system's gateways, regardless of where in the district those journeys originate.
- 2.20 However, EFDC should seize opportunities to maximise sustainable travel, active travel, and space-efficient travel, in line with the strategic objectives of the MTS and DLP.
- 2.21 EFDC Policy T1 comprises parts A to G, in which parts A, C and F have a number of sub-sections.
- 2.22 We consider that most parts of Policy T1 meet the strategic objectives of the MTS and DLP, in respect of transportation, with two exceptions.
- 2.23 Part A (ii) reads,
"The Council will work in partnership with relevant stakeholders to promote a safe, efficient and convenient transport system which will...
(ii) promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent and direct cycling and walking networks to provide a genuine alternative to the car and facilitate a modal shift"
- 2.24 Part (ii) should go further towards active, healthy, sustainable alternatives to the car by welcoming large developments and urban extensions which comprise a mix of land uses, through which some of the daily needs of future residents and users are provided on-site, coupled with the provision of a safe, efficient and convenient transport system.
- 2.25 In this way the need for longer journeys is lessened, and the shorter travel distances afforded by the mixed-use development are more conducive to active travel modes.
- 2.26 Part B reads,
"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."

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- 2.27 This should also go further to support sustainable travel by stating that large housing developments are encouraged to provide local services and facilities on site so that sustainable and active travel can form part of the future residents' and users' daily lifestyles.
 - 2.28 Beyond Policy T1, EFDC intends to allocate land at rail station car parks for development, notably c.89 homes on Epping London Underground Station Car Park, c.165 homes on Loughton London Underground Station Car Park, and c. 192 homes at Debden London Underground Station Car Park.
 - 2.29 Building on these station car parks will be detrimental to existing sustainable travel patterns, as well as undermining the Mayor's transport objectives.
 - 2.30 By removing the parking supply at these stations, there will likely be resultant knock-on effects in the surrounding areas.
 - 2.31 Underground passengers will need to go elsewhere to seek alternative parking, potentially parking on street which could affect emergency vehicle access, or using parking intended for other purposes which could affect the viability of high streets and shopping centres.
 - 2.32 In addition, Underground passengers will potentially drive further towards London to stations where parking is available, adding to congestion on the strategic routes further into the conurbation.

Proposed North Weald Park development.

- 2.33 The proposed North Weald Park development comprises a mix of residential, leisure, employment, retail and education land uses. The mix and layout of the different land uses is such that many of the shorter trips between the residential and the other uses within the development will be made by non-car modes.
- 2.34 Whilst all of the proposed housing is to the south of the A414, land to the north of the A414 is also under the control of the applicant and is connected with the land to the south by way of an underpass under the A414. It is proposed that this area will be a country park that will improve access to the Green Belt for members of the public in line with paragraph 138 of the 2019 NPPF. Given the site's accessibility, it also offers an excellent opportunity to be used as SANGS to help mitigate the impact of development elsewhere in the District (including on allocated sites) on the Epping Forest SAC and also the Hatfield Forest SSSI / NNR.
- 2.35 Every home will be provided with two electric bikes and every home will have access to an electric car charging point, thereby providing infrastructure to facilitate and encourage the use of zero-emission electric vehicles by the site's future occupiers and visitors.
- 2.36 New bus services and bus stops will be incorporated into the development, with attractive pedestrian routes linking to the bus stops. Discussions with local bus operator Trusty Bus are ongoing, seeking to secure the introduction of new hi-tech, low emission bus services into the development site.
- 2.37 This will help to achieve the aim of providing an attractive whole-journey experience.
- 2.38 There is the potential for approximately three hectares of land at North Weald Park to be designated for a Park & Ride facility to serve Epping and possibly Harlow.

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- 2.39 This will promote the use of space-efficient transport to benefit the wider community as well as the proposed development itself, and would provide the opportunity to reduce traffic and congestion in these towns and their rail stations, with the resultant wider transport benefits.
 - 2.40 Discussions with Essex County Council Highways are ongoing with regard to the designation of land for a Park & Ride scheme.
 - 2.41 Essex County Council have expressed an interest in pursuing a Park and Ride at this location, and as such we are safeguarding a suitable area of land for this purpose to preserve the Council's ambition.
 - 2.42 The Park and Ride facility has the potential to serve Epping, Harlow, and Ongar.

Matter 13: Transport – Issue 1

Question 2: Should Part A, perhaps A(ii) make reference to the desirability of promoting safer routes to school and to establishing an attractive pedestrian environment around schools to encourage travel by non-car modes? (Reps ECC).

- 2.43 The Department for Transport (DfT) publishes annual estimates of travel times from where people live to key local services including primary schools and secondary schools. These are known as the Journey Time Statistics (JTS) series, the latest set were recorded in 2015 (published in July 2017).
- 2.44 The JTS average distance to the nearest primary school is 2.3 km, and for the nearest secondary school, the JTS average distance is 3.7 km.
- 2.45 The statutory maximum walking distance for primary school pupils is two miles (3.2km), for secondary school pupils, the distance is 3 miles (4.8km). Data from the National Travel Survey shows that the proportion of primary pupils walking to school decreases sharply for trip lengths in excess of 1 mile (1.6km).
- 2.46 Walking is a very popular travel mode for journeys to and from school, and therefore, in order to accommodate and maximise the demand, the routes between residential areas and schools need to be safe, accessible, and attractive.
- 2.47 The response to the Inspector's question must be that Policy T1 part A should require the provision of safe routes to school and attractive pedestrian environments around schools.

Proposed North Weald Park development.

- 2.48 The proposed North Weald Park development includes a primary school. This will serve the new development as well as the existing local community.
- 2.49 Having the school on site will remove the need for residents of North Weald Park to travel, and will provide alternatives to the private car as a mode of transport.
- 2.50 Pedestrian and cycle access between the school and the residential parts of the development will be afforded by a network of footways and cycle ways, providing a car-free safe route to school.

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- 2.51 The nature of the proposed development, in terms of its mix and pattern of land uses, is such that non-car travel is both facilitated and promoted. The development is conducive to making short journeys within the site by non-car modes, facilitated by the provision of attractive and convenient pedestrian and cycle routes, with non-car connections between the residential area and the school, as well as off-site connections via public rights of way.
- 2.52 The planning application is supported by a Residential Travel Plan, and the school will ultimately have its own Travel Plan. This will include provisions for the active promotion of non-car travel, with funding allocated for measures and initiatives to promote active travel to/from the school.

Matter 13: Transport – Issue 1

Question 3: Is it clear what scale/type of development will be required to submit a Transport Statement or Assessment in accordance with Part D?

- 2.53 Part D of the emerging EFDC Local Plan Policy T1 states that,
- “Development proposals that generate significant amounts of movement must be supported by a Transport Statement or Transport Assessment and will normally be required to provide a Travel Plan. Development proposals which generate a significant number of heavy goods vehicle movements will be required to demonstrate by way of a Routing Management Plan that no severe impacts are caused to the efficient and safe operation of the road network and no material harm caused to the living conditions of residents.”*
- 2.54 Policy T1 part D does not specify the definition of ‘significant amounts of movement’, and therefore, it is unclear what scale and type of development must be supported by a Transport Statement (TS) or Transport Assessment (TA).
- 2.55 The policy should be expanded to set clear thresholds which trigger the requirement for a TS and TA.

Proposed North Weald Park development.

- 2.56 The proposed North Weald Park development is supported by both a TA and Travel Plan, thereby satisfying Part D of EFDC Policy T1.
- 2.57 The submitted TA concludes that the traffic associated with the North Weald Park scheme can be accommodated on the local road network.
- 2.58 Junction 7 of the M11 is known to be an area of concern with already high volumes of traffic using the junction. The development sites envisaged in the emerging EFDC local plan are therefore likely to result in the junction operating under increased stress, even allowing for the construction of a new motorway junction on the M11 (Junction 7a).
- 2.59 In our opinion, EFDC has not allowed for the required level of growth, and the necessary infrastructure is not reflected in the Infrastructure Delivery Plan.
- 2.60 The North Weald Park scheme can deliver significant highways improvements at M11 junction 7, which will provide significant betterment to the existing traffic flows and capacity in the local area.

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- 2.61 The following improvements are proposed for M11 junction 7, also shown on a drawing in Appendix 1:
- Widening to the M11 southbound exit slip road where it meets the signalised roundabout to provide a third entry lane. This will improve the capacity of both the slip road and also for vehicles going round the junction, as the third lane will mean that the slip road needs less green time, and more green time can be allocated to traffic going round the junction.
 - Widening and improvements to the A414 east approach to the roundabout for traffic approaching from the Chipping Ongar direction. Again, this will improve capacity for both entry and circulatory traffic by the reallocation of green time.
 - Widening to the M11 northbound exit slip road where it meets the signalised roundabout to provide a third entry lane. Again, this will improve capacity for both entry and circulatory traffic by the reallocation of green time.
 - Widening to the A414 and M11 southbound slip road exits from the junction to allow an improved exit flow from the junction and better usage of the lanes on the junction.
 - Widening of the circulatory carriageway of the junction in the east side of the M11 from three to four lanes. This will improve the capacity for both traffic entering and circulating around the junction, by the reallocation of green time.
 - Widening the circulatory carriageway of the junction on the west side of the M11 at the B1393 London Road from two to three lanes, this will improve capacity for both entry and circulatory traffic by the reallocation of green time.
- 2.62 Junction modelling undertaken as part of the North Weald Park TA shows that the proposed junction improvements will result in a substantial improvement to the operation of the junction as a whole. For instance, in the weekday morning peak hour the total delay is shown to reduce by 90 hours from 215 hours to 125 hours, which is a reduction of 42%. In the weekday evening peak hour, the total delay reduction is 85 hours, which is a reduction of 37%.
- 2.63 As more people will be using the junction in 2033 than at present, the average delay per vehicle will reduce by 47% in the weekday morning peak hour and 42% in the weekday evening peak hour
- 2.64 The submitted Residential Travel Plan for the residential elements of the proposed development accompanies the TA. It seeks to reduce car-based trips to/from the development site, particularly single-occupancy vehicle trips. The Travel Plan will include the provision of Residents' Welcome Packs for up to 690 dwellings, promoting sustainable travel from the very outset of the development's occupation.
- 2.65 None of the proposed land uses are predicted to attract significant numbers of heavy goods vehicles during their typical operation, however, it is also anticipated that a Construction Management Plan will be implemented prior to the start of works on-site to manage the impact of construction traffic.

Matter 13: Transport – Issue 1

Question 4: Are different parts of this policy intended to apply to development of different types/scales? If not, why are Part C and Part F, which both concern the circumstances in which development will be permitted, separate? Should amendments be made for clarity?

- 2.66 Parts C and F of EFDC Policy T1 set out a list of circumstances in which development proposals will be permitted. There is some overlap/duplication between parts C and F.
- 2.67 Part C states that,
- “Development proposals will be permitted where they:*
- (i) integrate into existing transport networks;*
- (ii) provide safe, suitable and convenient access for all potential users;*
- (iii) provide on-site layouts that are compatible for all potential users with appropriate parking and servicing provision; and*
- (iv) do not result in unacceptable increases in traffic generation or compromise highway safety.”*
- 2.68 Part F item (i) reiterates part C item (iv).
- 2.69 Part F item (ii) requires the mitigation of development traffic impacts on the transport network.
- 2.70 Part F item (iii) requires developments to protect and, where appropriate, enhance access to Public Rights of Way.
- 2.71 Part F item (iv) sets out the expectation of appropriate parking provision, reiterating some of part C item (iii).
- 2.72 Part F item (v) sets out that development proposals should,
- “...provide a coordinated and comprehensive scheme that does not prejudice the future provision of transport infrastructure on and through adjoining sites.”*
- 2.73 The duplications set out above create ambiguity and uncertainty relating to their intended application. Clarity should be provided in this regard.

Proposed North Weald Park development.

- 2.74 The proposed North Weald Park development is located on an existing bus route and is designed with the necessary infrastructure to divert buses into the site. As such, it satisfies Policy T1 part C item (i).
- 2.75 The proposed development includes a new roundabout junction on the A414 and a new roundabout on Rayley Lane, both of which have been the subject of an independent Road Safety Audit, and are therefore designed to the appropriate highway safety standards.
- 2.76 These junctions incorporate pedestrian infrastructure, thereby providing safe access for pedestrians.

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- 2.77 A footway / cycleway will be provided through the site to Vicarage Lane West, from which Church Lane (a lightly trafficked route), several pedestrian rights of way, and Merlin Way (flanked by an existing footway) link the site to the centre of North Weald Bassett.
- 2.78 The layout of the site is designed to be compatible for all future users, and the internal streets, roads, and footways will be designed in accordance with the principles of Manual for Streets, thereby providing safe, suitable and convenient access for future residents, occupiers and visitors.
- 2.79 There are a number of public rights of way in the vicinity of the proposal site, including two routes that run through the site (EX:7390 and EX:32). These will be maintained and enhanced as part of the proposals.
- 2.80 The proposed North Weald Park development therefore satisfies Policy T1 part C item (ii) and Policy T1 part F item (iii).
- 2.81 The parking and servicing provision of the proposed North Weald Park are designed to meet the local standards.
- 2.82 Paragraph 3.92 of the emerging EFDC Local Plan states that:-
- “As set out above there are issues around the provision of car parking in new development. The Council believes that there are opportunities to take a more locally focused approach to car parking standards across the District.*
- It is therefore proposing to develop specific residential car parking standards for Epping Forest District. These parking standards will be developed based on:*
- an understanding of differing levels of car ownership across the District;*
- the different levels of current and future access to services and facilities across the District; and*
- making better use of land through widening the use of ‘unallocated’ car parking within larger developments and looking at the need for providing on-site garage provision.*
- Until such time as those standards are adopted, planning applications will use Essex County Council’s (ECC) adopted Parking Standards as the starting point.”*
- 2.83 The proposed development’s parking provision has been set in accordance with ECC’s *Parking Standards, Design and Good Practice*, adopted in 2009.
- 2.84 The proposed North Weald Park development therefore satisfies Policy T1 part C item (iii) and Policy T1 part F item (iv).
- 2.85 The TA submitted with the North Weald Park development planning application demonstrates that the traffic associated with proposed development can be accommodated on the local road network, and that the proposed improvements to M11 Junction 7, set out in paragraph 2.60 above, will mitigate the development’s traffic effect.
- 2.86 Therefore, the proposed North Weald Park development is predicted to not result in an unacceptable increase in traffic generation or compromise highway safety. In this way, Policy T1 part C item (iv), and Policy T1 part F items (i) and (ii) are satisfied.

Issue 2: Will Policy T2 be effective in protecting the land required for future transport schemes from development.

Question 1: Is it necessary to list the particular schemes for which land is required to be safeguarded? Is the relevant land shown on the Policies Map?

- 2.87 Policy T2 seeks to safeguard the land required for proposed transport schemes, with reference to schemes identified in Essex County Council's Highways and Transport Investment Programmes, the Highways England Route Investment Strategies, Network Rail Investment Strategies and Transport for London Investment Strategies.
- 2.88 The policy should be expanded to set out a list of all the known, planned, and committed transport schemes which are to be protected in the district, and these should be shown on the Policies Map to improve clarity.
- 2.89 The policy should also provide for the protection of any future transport schemes that may come forward during the lifetime of the Local Plan, including safeguarding the land at North Weald Park designated for the Park & Ride site, and safeguarding land at M11 junction 7 for the proposed junction improvement scheme.

Proposed North Weald Park development.

- 2.90 Connect Consultants has undertaken a review of the programmes and strategies listed in policy T2 to identify any proposed/planned transport schemes in the vicinity of the proposed North Weald Park development.
- 2.91 The outcome of the review is set out below.

Essex County Council Highways and Transport Investment Programmes

A414 Chelmsford to Harlow route improvements.

- 2.92 Essex Highways has a planned scheme to improve the A414 Chelmsford to Harlow route, which includes the section of the A414 that passes through the proposed North Weald Park.
- 2.93 The scheme is described by Essex Highways as,
"A number of improvements have been identified for the A414, designed to increase safety, highway capacity and encourage the use of sustainable transport along this route to support the future growth and regeneration."
- 2.94 At the time of writing, no dates are publicised for the commencement of this scheme.
- 2.95 Three locations on this A414 route are identified for improvements, none of which would be affected by the proposed development.
- 2.96 The scheme includes the investigation of additional bus and safety improvements, as well as footway and bus stop improvements along the entire route.

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- 2.97 The proposed new roundabout on the A414 that forms part of the proposed North Weald Park is designed to accommodate bus movements and has been subject to a Road Safety Audit. The new roundabout will not be detrimental to any bus and safety improvements that may be identified through the Essex Highways scheme; the applicant will engage with the Highway Authority in this regard, if necessary.
- 2.98 The designated access into the site will have a positive and significant contribution to enhancing the sustainable credentials of the site by allowing direct public transport access.

M11 junction 7A.

- 2.99 Essex County Council, in partnership with Highways England, is constructing a new junction (junction 7A) on the M11 motorway to link with Harlow.
- 2.100 The land required for this scheme is not affected by the proposed North Weald Park development.

Highways England Route Investment Strategies (RIS)

- 2.101 Highways England's RIS Period 1, covering the period 2015-2020, included a scheme to improve M11 junction 7.
- 2.102 Since the scheme was identified in RIS1, it has been announced that the funding for improvements to M11 junction 7 has been transferred to Essex County Council for the M11 Junction 7A scheme.
- 2.103 As such, M11 junction 7 will not be subject to improvements via Highways England's RIS, and therefore, the proposed improvements at junction 7 which form part of the proposed North Weald Park development will not be affected.

Network Rail Investment Strategies

No Network Rail Investment Strategies have been identified that would be affected by the proposed North Weald Park development.

Transport for London Investment Strategies

- 2.104 No TfL Investment Strategies have been identified that would be affected by the proposed North Weald Park development.

3.0 Conclusions

- 3.1 This report sets out representations in response to the two issues and their associated questions relating to transport, under Matter 13 in the *Inspector's Matters, Issues and Questions* document for Epping Forest District Council's (EFDC's) emerging District Local Plan 2011-2033.

- 3.2 In doing so, this document demonstrates that the proposed development at the former North Weald Golf Course (planning reference EPF/1494/18) complies with the transport policies in the emerging EFDC District Local Plan (Policies T1 and T2), including compliance with transport matters raised by the Planning Inspector in her *Inspector's Matters, Issues and Questions* document relating to the same.
- 3.3 The current planning application is live and will, if allowed, be able to deliver the significant public transport and infrastructure benefits set out above, at an early stage in the development process, with considerable betterment to the public, and opportunities to ensure less reliance on the private car as a means of transport.