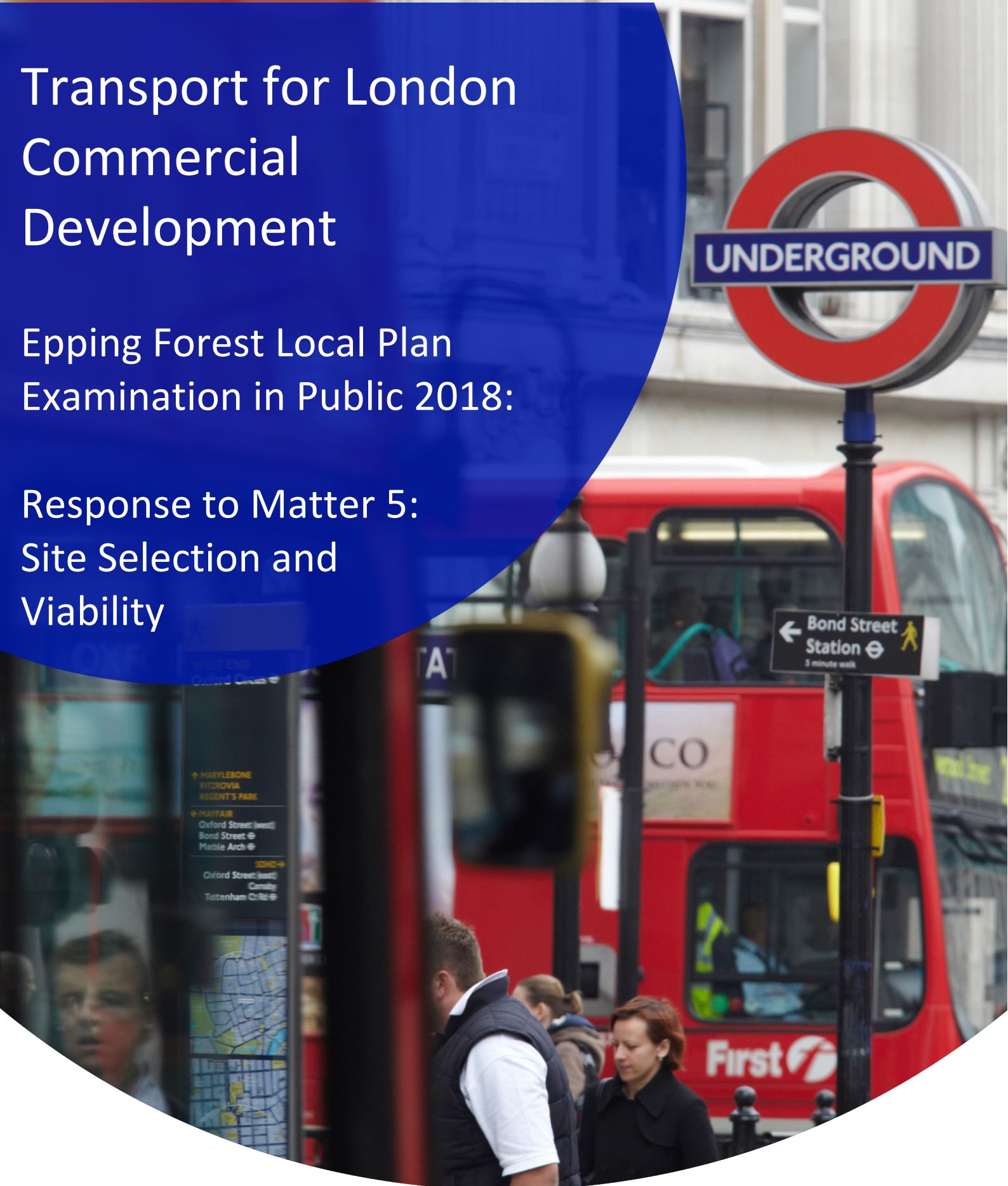


Transport for London Commercial Development

Epping Forest Local Plan
Examination in Public 2018:

Response to Matter 5:
Site Selection and
Viability



Epping Forest Local Plan Examination in Public 2018

Transport for London (Commercial Development) Response to Matter 5: Site Selection and Viability

Introduction

Please note that these representations set out the views of Transport for London Commercial Development (TfL CD) in its capacity as a local landowner and do not form part of TfL's response as a statutory consultee or transport operator.

Our colleagues in TfL Spatial Planning have provided separate representations throughout the Epping Forest local plan preparation process in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL Commercial Development (CD) Objectives

TfL CD operates with the five key drivers set out below to ensure that all development meets the objectives of the organisation:

- 1. Deliver Homes and Jobs**
- 2. Serve the Community**
- 3. Create Great Places**
- 4. Provide a Good Customer Experience**
- 5. Generate Sustainable Revenue**

The Mayor's Transport Strategy sets out transport objectives for TfL. These objectives apply to our operations and landholdings outside of London. At the heart of the strategy are three key themes:

1. Healthy Streets and Healthy People

Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.

2. A good Public Transport Experience

Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London and the South East's streets.

3. New Homes and Jobs

More people than ever want to live and work in London and the South East. Planning the region around walking, cycling and public transport use will unlock growth in new areas and ensure growth in a way that benefits everyone.

TfL CD has engaged with Epping Forest throughout the Local Plan preparation and consultation process. We have identified that key sites in the borough (currently operating as station car parks) which are suitable for residential led development. These sites have been allocated by the Epping Forest as residential site allocations within Draft Local Plan documents (Site Specific Requirements):

- Epping Underground Station Car Park (EPPR.3)
- Loughton Underground Station Car Park (LOU.R1)
- Debden Underground Station Car Park (LOU.R2)
- Queens Road, Lower Car Park, Buckhurst Hill (BUCK.R2)
- Theydon Bois, London Underground Car Park (THYB.R2)

1.0 Matter 5: Site Selection and Viability

Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

Question 6: Is it justified to allocate station car parks (EPP.R3; LOU.R1, LOU.R2; BUCK.R2; THYB.R2) and other car parks (EPP.R6, EPP.R7) for housing? Can adequate parking for both commuters and residents be provided; and how will short-term disruption to commuter parking during the construction phase be addressed?

- 1.1 TfL CD believes that it is justified and necessary to allocate station car parks for residential development in Epping Forest. This is due to the context of land constraints in the local authority area meaning that there is a scarcity of land which is suitable for residential development. As such the allocated station car parks sites will make a valuable contribution to meeting objectively assessed housing need, and policy within the NPPF promoting the delivery of residential development on sites with strong levels of public transport accessibility.

Site allocation justification in the Epping Forest Local Authority Context

- 1.2 93% of the Epping Forest Local Authority Area is allocated as Green Belt and this significantly constrains land which is available to come forward for residential development in the local authority area. The draft Local Plan identifies that the authority has a housing target of 11,400 homes for plan period 2011-2033 (518 homes per annum). Given the nature of the land constraints within the local authority area, the draft local plan promotes and prioritises the delivery of housing on brownfield sites suitable for residential development. TfL CD and Epping Forest agree that the underground station car parks sites listed above are suitable brownfield sites for residential development which will make a significant contribution to meeting housing need throughout the plan period. This is supported by the NPPF and the Mayor's Transport Strategy.
- 1.3 Further to the above, the station car parks at Epping, Loughton, Debden, Queens Road and Theydon Bois are located in or adjacent to town and district centres and local centres in the local authority area. Such centres have the best access by public transport within the local authority area and are well served by local bus routes (each underground station has a bus stop within 400m). Development on the car park sites will enable development schemes which are car lite or car free to come forward in line with the Draft Specific Site Requirements document while preserving appropriate levels of customer car parking.

National Planning Policy Justification for the Allocation of Station Car Parks

- 1.4 The NPPF supports the allocation of the station car parks for residential development. **Paragraph 103** of the NPPF states that *“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”*.
- 1.5 The allocated London Underground station car parks are located in or adjacent to town and local centres in the local authority area which have the strongest connections to public transport. As well as Central Line services being adjacent to each site allocation, there are bus stops for local bus routes within 400 metres of each station/site allocation. Residential development on the station car parks would limit the need for car travel and provide a choice of public transport modes for future residents in line with the NPPF. National policy therefore supports residential development at these locations.
- 1.6 **Paragraph 108** of the NPPF states *“that in assessing sites for development it should be ensured that*
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) safe and suitable access to the site can be achieved for all users; and*
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”*
- 1.7 The delivery of residential development on the car park sites adjacent to underground stations would promote the use of sustainable transport. As part of any development proposals on the station car park sites, TfL will continue to work with local authorities and our colleagues in London Underground to assess the capacity on the Central line and local bus services ensuring impacts of development were properly mitigated. Safe and Suitable access routes to each site already exists and can be improved as part of the development process.
- 1.8 **Paragraph 117** of the NPPF requires that *“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”*. Epping Forest and TfL CD agree that the station car parks constitute brownfield land in an extremely accessible location within the borough which is suitable for residential development in line with national policy. These sites can play a significant role in providing

residential development which is essential to meeting objectively assessed need in the borough throughout the Local Plan Period.

- 1.9 All of the allocated station car parks constitute brownfield land in a Local Authority area which is constrained due to the extremely high levels of Green Belt. The allocation of the station car parks is a necessity if the local authority is going to provide sufficient housing to meet objectively assessed need.
- 1.10 **Paragraph 118 part d)** of the NPPF states that that planning policies and decisions should *“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.”*
- 1.11 In line with this paragraph, the station car parks constitute under-utilised railway infrastructure upon which residential development could be provided. The station car park site allocations are justified in line with national planning policy as they are appropriate sites for residential development which will make a significant contribution to meeting housing needs within the borough. TfL CD will work with Epping Forest on a site by site basis to ensure that appropriate levels of commuter car parking are retained at the station car park sites.
- 1.12 National policy further justifies the allocation of these sites as **Paragraph 123 part a) of the NPPF** states that *‘plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.’*
- 1.13 The allocation of station car parks for residential development provides suitable land in accessible locations for residential development in the local authority area. Development on the station car park site allocations should be optimised in line with the above paragraph from the NPPF. Further details on the potential to optimise residential development on the individual car park sites will be given in the TfL CD response to Matter 15.

Mayors Transport Strategy Justification for the Allocation of Station Car Parks

1.14 Although the Mayor's Transport Strategy (MTS) is not directly applicable outside of London it deals with regional and national priorities in the wider south-east, cross boundary issues and the Mayor's intentions for TfL and other agencies to maximise the use of surplus transport land within their ownership for housing development.

1.15 **Page 217** of the MTS sets out the approach to development around stations and highlights the benefits: *"Land around stations provides opportunities to create high-density, mixed-use places – new communities that are well connected to local amenities, and to jobs and locations further afield. This makes the most of past investment in public transport, and the benefits of future public transport investment can be enhanced by providing new homes (including affordable homes in a range of tenures) and jobs nearby...Development opportunities around stations are particularly attractive for Build to Rent.*

Planning policy and decisions that seek to locate high-density housing within walking distance of stations mean residents will not only be well connected by rail or Tube to employment opportunities, but will almost always be better connected to schools, hospitals and shops by public transport, walking or cycling. Land around stations is often owned by TfL and other public sector landowners and presents a good opportunity to bring forward surplus or underused land for increased housing delivery."

1.16 The development of high density residential on station car parks is in line with the objectives of the Mayor's Transport Strategy and this further justifies the site allocations.

Providing adequate parking for both commuters and residents on the station car park site allocations

1.17 TfL CD believes that appropriate levels of car parking for both for future residents and commuters can be provided on the allocated station car park sites if they are bought forward for development.

1.18 Given the high levels of access by public transport to the station car parks sites, they are appropriate locations for car free or car lite developments. This is in line with paragraph 122 of the NPPF which states that *"Planning policies and decisions should support development that makes efficient use of land, taking into account: c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use"*.

- 1.19 The allocated car park sites are adjacent to town and local centres within the borough and have high levels of access by public transport, including London Underground and local bus routes (with bus stops within 400m of each site allocation). Future development on these sites has the scope to promote sustainable travel modes that limit future car use by providing car free or car lite development..
- 1.20 Car free or car lite residential development in accessible locations is promoted through the draft Local Plan. The site allocation for each station car park within the Draft Specific Site Requirements document states that *“To promote sustainable transport modes and encourage active transport, development 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 identifies car free or car lite residential schemes will be considered acceptable at these locations.
- 1.21 Draft Local Plan policy T1 Sustainable transport choices identifies that *“Reduced car parking, including car free, development in sustainable locations will be supported.”* Given that the station car park site allocations are in accessible locations in the borough, this further justifies the provision of car lite or car free residential development at these site allocations, minimising the need for developments to provide residential car parking (other than what is essential for the development such as blue badge car parking for disabled residents).
- 1.22 If proposing to bring forward residential development on the station car park allocations, TfL will assess on a case by case basis the level of customer car parking that needs to be retained at each station. In line with Planning Practice Guidance on Travel Plans, Transport Assessments and Statements, TfL will ensure that sufficient evidence (through the use of travel plans, transport assessments and Parking Surveys) is gathered on the levels of use of the station car parks, and the locations that customers who use the car parks are driving from in order to ascertain the appropriate level of station car parking that should be retained at each site.
- 1.23 This evidence would be provided as part of the development process for each station car park allocation site as they come forward. Based on this transport and parking evidence TfL CD and the Council can agree an appropriate level of customer car parking to be retained on the station car parks site allocations. In line with the MTS, TfL will promote the use of public transport, walking and cycling by customers using its stations wherever possible, and contributions from the development may fund improvements to local public transport access to the London Underground network.

Methods in which short-term disruption to commuter parking during the construction phase be addressed

- 1.24 When bringing forward development proposals on the station car park site allocations, TfL will examine on a case by case basis how disruption to commuter parking during the construction phase of developments can best be addressed. TfL CD will ensure that a construction method statement and transport assessment which examines the impacts on commuter car parking during the construction of development is submitted as part of the planning application in line with Planning Practice Guidance. In these documents, tailored plans to reduce disruption to commuter parking can be set out. Options to reduce disruption may include assessing if there are other station car parks which commuters could be directed to instead, if there is other available TfL owned land in the local area suitable for temporary commuter car parking or phasing the development to enable part of the of car park to remain available for commuters.

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