

Matter 15: Places

I am an individual, long-term resident of Epping; with no property interests in the District apart from my home.

Previously, I have resisted temptation to submit Statements further to Regulation 19 objections. Having attended hearings, and read statements by others appearing, a statement is appropriate.

Statement

The efforts made to provide local policies are welcome. Setting out policy/detailed site requirements for allocated development is good. These tell developers/land owners what to take into account in their plans/financial decisions; also informing local people what to expect. But the Plan needs to get them right. Problems with some policies have local and also wider implications: these aren't just 'NIMBY' concerns; including sustainability: environmental, social and economic aspects.

This statement considers:

- Epping Station, Station Approach and Car Park;
- Effects of a preference for travelling by Underground, rather than mainline rail, on parking and commuting;
- Parking, traffic, congestion, effects of commuters, set to increase;
- HQPT and EOR;
- Loss of employment sites, but additional workers in housing allocations, with no new employment sites or retail/other job generating provision, lack of jobs:workers balance, leading to more commuting - not Active Travel;
- Lack of retail (and other defined main town centre uses) provision, including Epping town centre car parks and St. John's Road site.

Epping Station, Station Approach

The Plan's wording about improvements to cycle and pedestrian access to the station to minimise conflict between different road users etc. (as page 6, Appendix 6) is okay in theory, but sounds like word-processed text from somewhere else: it is impractical. The road has a 2.1metre footway on one side only (with a narrow 0.7metre verge on the other, total highway width being only 9.3metres).

The 6.5metre road has lanes of just sufficient width for the buses which run in each direction. It is made narrower by the informal drop-off and collection of passengers by car drivers (as the Plan notes, but doesn't address impacts) meaning buses have to wait to

overtake this line of cars, which helps clog-up Station Approach and the Station Road junction.

Thus there isn't room in the highway to improve pedestrian access, nor do anything to help cyclists e.g. a cycle path.

(There is only 0.9-1.2metres strip of Underground land (not all clear of obstructions and not all level); some of which might be added along part of the Approach without removing -train noise reducing- landscaping).

The Plan suggests, as part of redevelopment, improvements for the footpath to Centre Drive to help improve access to the Station. Removal of the path's doglegs should be possible in any station car park redevelopment although it isn't at all clear how improvements to the gradient would be realised (there are 22 steep steps at Centre Drive end). A long gentle ramp would divide the redevelopment; or some ramp/s, perhaps spiral, could be built at the front. But a key constraint is the straight part between existing flats being just 1.2metres wide, perhaps a little wider if the handrail is no longer necessary. So this can only ever be a narrow pedestrian link, not cycle, serving part of Epping (the majority of pedestrians observed use Station Approach instead). Thus Station Approach is the most important route, but has its own space constraints and congestion.

Station Approach congestion problems are caused by cars dropping-off, or parked waiting to pick-up, Tube passengers. The Plan recognises this; although not the congestion effects. LUL don't enforce their yellow lines on Station Approach. If this road were adopted, our strict wardens would enforce restrictions; although drop-off/pick-up facilities space would need to be made an essential requirement (not guidance) for the Station Car Park development (EPP.R3).

Congestion of Station Approach can be only expected to increase: through

- Additional development on allocated sites it accesses, even if these are proposed to be mainly car free (with some residential parking);
- Extra bus services, cyclists and pedestrians generated by new developments; and
- Additional bus services from Harlow centre as Harlow grows.

Station Road/Station Approach junction

Apart from the congestion on Station Approach itself, as above and set to worsen under the Plan; cars/vehicles sitting on Station Road at the 4-way junction waiting to turn cause access problems. The junction already clogs-up including tail-backs:

- down Station Road trying to turn right into Station Approach, go straight on, or left into Kendal Avenue;
- into and out from Station Approach, including across to Kendal Avenue, which produces congestion feed-back along Station Approach especially for buses as above;
- out of Kendal Avenue turning any of three ways; and
- up Bower Hill/railway bridge trying to turn left into Station Approach, sometimes right, or go straight ahead up Station Road.

The current cross-roads, without any offset of the centre lines of Kendal Avenue and Station Approach (usually at least 5 metre offset in highways standards) means that drivers, especially those uncertain about the giving way to the right, exacerbates congestion problems. These lead to frustration, honking horns, and disturbance to the quiet enjoyment of gardens/houses nearby.

A mini-roundabout would both help with both priority, and flow: keeping vehicles behind each of the 4-way Give Way lines so that the junction doesn't get clogged. (The Kendal Avenue refuge is already set back from the junction, so shouldn't need to be moved). Also, narrowing the left lane up Station Road to make space to widen the lane coming down that hill, would allow two downwards lanes to be formed. These would allow separation of vehicles turning right into Station Approach from those either going straight on over the bridge down Bower Hill or turning left into Kendal Avenue (Kendal Avenue/Carrisbrook Close are also used as Tube passenger pick-up points).

Before any development off Station Approach (EPP.R3) takes places the junction problems need resolving, by the means suggested above as a primary requirement and pre-condition of development. Even if the number of extra cars generated by the Plan's allocation is minimised by limited car ownership; with car sharing/pooling, spaces for visitors and for disabled drivers/blue badge holders, this will still lead to an increase in car traffic.

Just stating the problems "may necessitate improvements" (page 6, Appendix 6) is wholly insufficient. Plan policy needs to clearly require significant junction improvements whether or not a site brief is produced before a planning application is made. Given the pressing need for housing, an application may come forward before a brief is produced: even if refused by EFDC it may be granted on appeal by someone who doesn't fully appreciate, or experience on a daily basis, the problems at the junction.

Text on Appendix B-page6 should be clear about the junction where pedestrian crossings are likely required, and added to the above junction improvement requirements.

Epping Station Car Park + Building Supplies

The Station Car Park is known to be full as early as 6:45 am. Commuters use the town centre (Bakers Lane and Cottis Lane) Car Parks, reducing spaces for town centre visitors. The Plan

recognises station parking pressure effects via CPZ contributions regarding overspill parking on residential etc. roads.

As there will be more land available at Epping EPP.R3, with the addition of the builders supplies site, more parking than the current 534 spaces should be provided to meet additional needs in the Plan period. The Plan should require this as part of development of the site. More parking capacity at Epping could lead to commuters who have had trouble finding a parking space, and thus tempted to make their whole journey by car instead (e.g. Epping to Loughton), to be more inclined to use public transport and reduce vehicle emissions – especially as many commuting journeys will be through Epping Forest Special Area of Conservation (SAC) which is being harmed by vehicle pollution.

It is all very well for the Plan to mention contributions to CPZs (helping residents affected by displaced parking and shortage of spaces). But that doesn't help those who need to park and commute; they get pushed further away from an Underground Station by CPZs, having to walk further (while potentially annoying residents further away) with longer journey times. The further away they get pushed, the more likely they will use their car exclusively for their journey. Instead of displacing the commuter parking problem from one area to the next it should be tackled while there is an opportunity in a positively prepared Plan that looks ahead to 2033!

An increase in capacity can be gained in another way than just a larger site area: differential pricing (as referred to below and detailed in 2.) of my Transport Hearing Statement). Both methods should be used in combination and put in the Plan.

Central Line usage and commuter parking can be expected to increase due to developments in the District around Harlow and H&GGT. Using Church Langley figures as an indication (c.6 miles/12 minutes' drive), 272 workers (5.5%) from there travel by Underground etc., which may be nearly 272 cars just from that dormitory development. Numbers/proportions arising from Latton Priory, being far closer (c.3.6 miles/6 minutes) and with less junctions (no M11-J7 in the way) will be higher. The sustainable/public transport deficiencies in EB1406 and EB1408 regarding Latton Priory are set out in my Hearing Statement on Matter 14.

HQPT and EOR Line

Epping, North Weald, Ongar and others would benefit from sustainable transport, as described in the Transport Hearing Statement.

Underground and mainline rail

The Plan recognises the problem of commuter driving from distant parts of the district to use Central Line services, being cheaper than mainline rail services available just outside the district boundary and at Harlow (2 stations). People from Harlow drive to Epping, rather than use Harlow's own railway stations. Data for Church Langley -expected to be more pronounced at the Latton Priory allocation (as above)- is that 5.5% of workers use the Underground (c.f.6.3% Train).

The Plan says the planning system cannot do anything about this, but it could -as mentioned in Regulation 19 Reps. and shown in my Transport Hearing Statement- by differential parking pricing as part of redevelopment. This could help relieve parking pressures at Station Car Park and thence elsewhere in Epping (residential areas and town centre car parks).

So differential parking pricing should be a requirement of the development of EPP.R3; likewise LOU.R1 and LOU.R2.

Jobs:workers imbalance

At Matter 8 on 21/3/19 there was uncertainty among the two councils about what ratio constitutes a jobs:workers balance locally. Surprisingly, EFDC appeared not to know what this figure should be, suggesting it hadn't been considered during Plan production –or now! Earlier MIQs raised the issue about job numbers, not just employment land. A jobs:workers balance reduces the need to travel (and congestion “peak spreading”/”shouldering”), while increasing Active Travel with its health benefits, and helping productivity.

Among many other references in the Plan to sustainable transport, Plan policy T1B. states “Development should minimise the need to travel” and “promote opportunities for sustainable transport modes”. But land allocations are doing the opposite!

The Plan allocates sites for some 1,305 new homes in Epping, while not allocating additional sites for employment. (The general text about more intensive redevelopment of employment sites doesn't apply to any significant extent for Epping given the nature of its employment sites, e.g. Falconry Court is recent and very intensive). Indeed the Plan allocates existing employment sites, including one which is ripe for redevelopment (EPP.R9), for housing, adding to the jobs:workers imbalance.

The Plan instead allocates major new employment sites at North Weald Bassett and Waltham Abbey. For new Epping residents, travelling to work will mainly be via private car adding to pollution and congestion: through the High Street and Epping Forest to North Weald; and particularly through Epping Forest SAC to Waltham Abbey. To be sustainable the plan should aim for a jobs:workers balance in the town, particularly as it is one of the most significant in the District with the highest homes allocation. Jobs:workers balance seems an

overall aim of the Plan in terms of total new homes and job numbers: but this hasn't been applied to local areas/towns. While some current residents commute out of the District to work, and some workers employed in the District commute in from homes outside it; nevertheless it makes long-term sustainability sense to make provision for a balance of employment premises and homes within the District's settlements, to reduce the NEED to travel. This is accepted wisdom. Also, as travel routes are likely to become more congested, and the costs of travel increase (both financial and environmental), planning for this future will make the District's residents better off, more productive, and healthier.

Sites EPP.R9 and EPP R.8 are sites where employment retention/intensification would be far more appropriate than new housing, and would help even-up the jobs:workers ratio.

- Bower Vale/Epping Laundry, EPP.R9 could be redeveloped more intensively, just as the Plan expects other employment sites to be! It borders relatively few residential properties, whereas housing development would create more residencies close to the longer boundary with allocated employment to the south (EPP.E4). So problems arising from housing next to employment uses would be made worse.

- EPP.R8 part of the Civic Offices. These offices, and the number of workers current buildings can accommodate, contribute to the health of Epping town centre through their spending on local goods and services. The loss of relatively modern, purpose-built, space will be significant in terms of the town's employment. Even if vacated, use of this floorspace retained for employment could accommodate new jobs, e.g. for businesses moving out of London as the Plan mentions (given 15 minutes' walk to the Underground). The premises could provide local employment for some occupiers of the 1,305 new homes, or existing town residents, who could then walk or cycle to work. The Great Crested Newt population on the site is least likely to be affected by office use continuing (compared to housing): moving newts elsewhere is unacceptable when a better alternative is available. Also the newest Civic Offices buildings, partly on site EPP.R8, were recently listed, including internal features such as wood panelling/fittings. Continued use for employment would best fit with the listed building, unlike housing.

It is of course open to the buildings' owner to use permitted development rights to convert offices to housing. But I don't think this likely due to the nature and scale of the building (particularly the listed parts which would still require Listed Building Consent). Even so, the ability to use permitted development rights doesn't mean that retaining/allocating the site for employment (as the Plan does for Falconry Court, which could likewise (and more likely) be converted to housing) isn't right in planning terms.

The Plan recognises the need for start-up and grow-on space: these sites could contribute to meeting that: Epping Laundry site with its own access, large enough for subdivision and ripe for redevelopment; and the part Civic Offices being capable of subdivision for

offices/managed workspace in a town centre location (15 minutes' walk from the Underground).

There will be implications in allocating these 2 sites for employment on housing numbers. If both were allocated for employment, the number of homes on allocated sites for Epping would drop to 1,211. Density figures for Epping housing sites are given in very precise numbers, e.g. 83 dwellings per hectare (for the station car park site), not round figures like 80 or 90. It would only take a 7.7% increase in density for other Epping housing sites to make the 1,211 figure back up to 1,305. Alternatively, parts/edges of new allocated employment sites (e.g. Waltham Abbey or North Weald Bassett) could benefit from some housing, e.g. to help site viability and provide accommodation for workers nearby. Particularly where this would improve the jobs:workers balance for those settlements under the Plan.

Without more retained/new employment sites in Epping, or retail etc. jobs; workers added to Epping's population, e.g. the major allocation at South Epping would need to travel- probably by car- e.g. to the Plan's major employment site allocations at North Weald (through SSSI and Epping High Street) or Waltham Abbey (through the SAC) adding to avoidable pollution and congestion.

Active travel benefits

Walking or cycling to work along short distances in Epping will be more sustainable (environmental, social, and economic aspects of sustainability): better for health, exercise and well-being; quicker, giving more time for community/social activities and better looking after children (or neighbours/the elderly); less polluting; producing less congestion (which helps everyone, including those who have to drive), etc.. Also it would even help increase productivity, a known problem with the UK economy, and raise net personal income levels (by reducing travel costs). What's not to like? Much mention has been made of Active Travel at H&GGT Hearings by EFDC, but this hasn't been incorporated elsewhere in planning for the district -as it should.

Lack of retail (and other defined main town centre uses) provision, including town centre car parks and St. John's Road site

The Hearing Statement on Employment demonstrates an unsound lack of planning for retail (as NPPF requires). The centre of Epping is a suitable location for retail along with other "main town centre uses".

Instead, the Plan allocated residential to land that could accommodate retail etc.: Bakers and Cottis Lanes car parks. Redevelopment of these with retained parking would have the benefits of retail and parking next to each other, and in close proximity to existing retail/the town centre. All in a sustainable location and walkable: for shoppers and workers.

The Plan (5.11) mentions St. John's Road site in Epping, including a brief which "will provide increased retail" (amount unspecified). However, this is not a Plan allocation: it should be, especially given the lack of retail allocations in the Plan elsewhere. Instead EPP.R4 is allocated for housing! Para.5.21 states the town centre's retail offer will be enhanced: how?

Site EPP.R11 is described as a library, but on upper floors it provides much more. Within the town centre, it could accommodate more essential town centre uses than just housing.