EFDC Local Plan Hearing – Matter 14- Infrastructure and Delivery

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Introduction

This statement follows on from my submission on transportation and addresses wider issues of infrastructure delivery and implementation, of which transport is a major part.

The documents on which I wish to make detailed observation are known as the Arup Reports Part A (EB1101A) and Part B(EB1101B).

Infrastructure –Part A

- 2.2 Sub Regional Context -If the LEP objective in the SE Growth Deal (2015) is to build 23,000 houses within East Sussex, Kent and Medway, Essex and Thames Gateway, then the objective to deliver in excess of 10,000 houses in the EFDC region is an unfair allocation.
- 3. –Socio Economic Portrait –the finding that 54% of residents travelling to work commute to London is a telling statistic and one which is well understood by local residents.
- 4.3 Quantum Development It is noted that a total of 9816 houses are likely to be constructed on allocated sites. It can be assumed that these are in addition to the current proposals. Some of these developments in areas away from Epping, (e.g. Fyfield and Ongar) are currently underway and will shortly be generating a need for infrastructure support. The low numbers for Epping do not appear to reflect infilling which is evident around the town.
- 4.4 Forecast modelling An analysis of the Settlement Hierarchy Technical Paper, (not a reference document and identification attached), generally shows a relatively low household size when dividing 2011 census population by number of dwellings, generally between 2 and 2.5 people per dwelling, (Chigwell is higher at 3.1), with the lowest figures in rural areas. This is not unsurprising, and reflects families where children of school leaving age have moved from family homes. The dwellings proposed in the LPSV, where 40% are to be affordable, are likely to attract families with children of school age and younger requiring the full range of infrastructure facilities considered in this report, rather than the current predominance of retirees. It is not clear how this is reflected in the analysis. There is no indication in the LPSV of the number of new residents the housing proposals are likely to produce nor of the true impact which these may have on life in the towns of Epping and Ongar. If the occupancy rises to 4 or more people per dwelling the impact would be dramatic.
- 5.1 Highways. The Report acknowledges that the "highway network is generally at or approaching capacity", and "congestion is an issue". It is accepted that highway schemes at A414, M11 Junction 7a and in Harlow generally will do little to alleviate the traffic problems around Epping and North Weald. It is likely that improvements to junction 7 M11 at Hastingwood will encourage traffic to use the B1393 and A414 to access the motorway with consequential increases in traffic through Epping, North Weald and Ongar. Funding by Essex County Council for improvement schemes in the Epping area is unlikely to be forthcoming as the capital budget is generally used for large schemes across the County. The District funding is minimal. The reliance on developer contributions for funding

infrastructure is considered in my comments on the Arup Report Part B, as is the need for greater funding and its availability from National sources.

- 5.2- Rail and Underground Network- The Report identifies that there is capacity in the LUL Central Line at Loughton and beyond. As a regular user of the system my experience is that there is congestion at peak hours, often with all seats occupied to Epping, which has become significantly more noticeable in recent years. The observation in the Report the "residents choose to use the Central Line in preference to overground rail as it is more cost effective --- and provides better connections" is pertinent and supported by local experiences. The consequence of this is very considerable and unacceptable congestion at Epping Station: speculative proposals for additional housing, a multi deck car parking and a full bus terminal at the Station are unlikely to be feasible due to funding, site restrictions and poor road access. With the current funding problems associated with major civil engineering projects, any reliance on commuter relief from Crossrail 2 and the Deep Tube Up-Grade Programme is futuristic.
- 5.3 Bus Network The local bus network for short trips in and around Epping is relatively good and well used. As noted in the Report, it is less so in outlying districts. Electronic signing to announce the routes and times of buses at sopping places would improve usage as confidence in the services provided would be enhanced. The EFDC region seems to be lagging behind other areas in UK in this respect. As a regular user of bus routes around Epping it is apparent that there is wide utilisation of concessionary fares, particularly for retirees. Routes to and from the link between Epping LTE station and Harlow are particularly well utilised at peak times.
- 5.4 Walking and Cycling- I am an enthusiastic walker and cyclist, (the owner of one of the few electric bikes seen in the Town), and a regular user of footpaths in Epping and the surrounding area. The provision of recreational walking paths in the Epping area is well served by the Forest area. The provision of coordinated links is less well catered for as the distances between the Town Centre and outlying communities is sufficiently far to discourage walking. Footpaths along B1393, B181 and B172 and A121 are minimal, poorly maintained and dangerous to use. The linking routes around Epping will not be provided by any of the highway interventions identified in EB503, which show junction improvements, and the objectives cited in "Requirements" will require major funding by EFDC. Restrictions by required acquisition of adjacent Forest land will also be restrictive. As noted in the Report there is a lack of provision of cycle infrastructure on rural roads in the area which is safe to use. No specific routes which would encourage a transfer from vehicle use to cycle use for domestic purposes are proposed in EB503. The route shown linking Coopersale to Epping in the Cycle Action Plan, (reference copy attached), is little more than a track about 1m wide with barriers requiring dismounting at regular intervals. An extension of this to North Weald is unlikely due to intervening housing and roads. The provision of better walking and cycling facilities in the Epping area is much needed as a local facility regardless of the requirements of the LPSV, with implementation in the earliest possible timeframe for the Plan.
- 6- Education, The provision of education is very dependent on the make up of households for the proposed developments in the area as noted above. The catchment area for Epping schools is wide and involves commuting from the adjacent villages. There is little local evidence that this is undertaken by walking or cycling. The traffic generation and congestion around the Bell Common

area,(B1393 and B182), has noticeably worsened since the relocation of Epping St. John's School to Bury Lane.

7 and 8 - Health, Social Care and Emergency Service. Local usage indicates that there is considerable difficulty in the Epping area with GP provision. Waiting times to see a GP at the Limes surgery is in excess of 6 weeks, with the booking periods often blocked out. Similar waiting times are experienced to see a Nurse Practitioner. This confirms the observations in Section 7.2.3 of the Report. In other respects the current service provided by NHS are satisfactory.

9. Sports Facilities. – As a user of some of these facilities it is my view that there is currently good provision for sporting activities. As would be expected in an affluent area, the ability to pay for these is a significant factor in usage. Covered tennis facilities are limited and a swimming pool in Epping would be welcomed. The Stonards Hill area and adjacent fields are well used for walking, (with and without dogs), football, outdoor playing and young children recreation. The Jack Silley Pavilion is an excellent facility which could be expanded to provide for small scale indoor sports.

General Provision of Services – Local residents would generally agree, (if this is ever possible), that provision of services which contribute to a comfortable life in Epping are satisfactory. There is, however, concern that housing expansion and associated increase of population in the town and surrounding area will materially affect everyday life. The timing lag and funding gap between housing development and the provision of infrastructure is a major talking point at Town Council and local resident level.

Infrastructure - Part B

Section 6 – Funding options are identified and offer wider opportunities aimed at specific proposals rather than generalised Developer Funding under Section 106 and Section 278 Agreements.

Section 6.2 Proposals for dealing with funding and what will be funded by CIL and Section 106/S278 related to the Epping area are at a very early stage of development by EFDC and delivery must be considered to be circumspect.

Section 8.11 - Epping

The reliance on Developer Funding to meet the acknowledged infrastructure shortfalls in the Epping area is unworkable. An identified funding gap of £60m – £70m is not linked to a programme nor to detailed proposals. (The equivalent sum for Loughton is £46m -£54m., for Ongar is £ 16m.-£17m and for North Weald is £22m.-£25m.). The testing of the outlined interventions by futuristic scenarios is flawed and little more than guesswork since no firm schemes have been developed. It could be

said that the proposals assume that funding will be by "fairy gold". As a business plan, the concept is unrealistic in terms of forward planning, fundraising, programme and delivery, as is the testing of the proposals with speculative income from property sales.

The proposal to mitigate traffic build up by a shift to sustainable transport are particularly sketchy. There has been no consideration of routes ,land acquisition, junctions and crossings, lighting, conflict of modes and connectivity. The restraint of Forest land has been acknowledged but no proposals to deal with acquisitions or impact on SSI sites have been made.

Residents of Epping have been assured that the housing proposals in the EFLP are associated with the delivery of infrastructure projects which will mitigate the impact of up to 11,000 new homes. The assumptions on which the infrastructure delivery is based is flawed and therefore the housing proposals should be rejected.

Conclusion

As a Civil Engineer familiar with large projects, it is my view that the housing proposals for the selected areas surrounding Epping do little other that put a gleam in the eye of local landowners, property developers and speculators. There is nothing in the proposals which stimulates architectural debate and local residents are given no indication of how the proposed developments will be conceived: are we to expect that Epping will become a sprawling metropolis of redbrick boxes? The current thinking in construction is a major swing towards offsite or factory fabrication and onsite assembly, (House of Lords debate, December 2018 and Report "Innovation on Construction, Clyde and Co, Referenced by copy attached). None of the selected plots around Epping merit construction on a major prefabrication scale utilising innovative architectural solutions. The HLG Act required expansion would be better met by expanding the concept of Garden Town developments integrating infrastructure and employment opportunities such as the at Harlow and Gilston and the proposed new town for 25,000 units at Waterbeach north of Cambridge.

John Manning

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