

EPPING FOREST DISTRICT COUNCIL
EXAMINATION OF THE DISTRICT LOCAL PLAN, 2011-
2033

MATTER 13: TRANSPORT

PRE-HEARING STATEMENT ON BEHALF OF
EPPING FOREST DISTRICT COUNCIL

APRIL 2019

INTRODUCTION

Epping Forest District Council ("the Council") submits this statement in response to the Inspector's Matters, Issues and Questions ("MIQs") (ED5). This statement addresses Matter 13: Transport and provides the Council's response to all of the Inspector's questions associated with Issues 1 to 2 (ED5, p 23).

Where appropriate, the Council's responses in this statement refer to but do not repeat detailed responses within the hearing statements submitted by the Council concerning other Matters.

Key documents informing the preparation of this statement to which the Council may refer at the hearing sessions include:

- [ED10A Draft Statement of Common Ground Between Epping Forest District Council and Essex County Council – Appendix 1 draft resolved objections \(2019\)](#);
- [EB912 Epping Forest District Council Local List of Validation Requirements \(2019\)](#); and
- [19STAT0009 Transport for London Regulation 19 Representations](#).

All documents referred to in this statement are listed in Appendix A of this statement together with links to the relevant document included within the Examination Library.

Examination Library document references are used throughout for consistency and convenience.

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?

Inspector's Question 1

- 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).**

Response to Question 1

1. The Mayor of London's draft Transport Strategy was published for consultation in June 2017 and was subsequently adopted in March 2018. The draft London Plan was published for consultation on 1 December 2017 and is currently at Examination at Public. The strategic policy objectives identified in Transport for London's Regulation 20 representation to the LPSV (19STAT0009) were as follows:
 - (a) promoting Healthy Streets;
 - (b) rebalancing the transport system towards walking, cycling and public transport;
 - (c) improving air quality; and
 - (d) reducing road danger.

2. The Council considers that Policy T 1, together with other policies in the LPSV, including (but not limited to) Policy SP 3 (Place Shaping), SP 4 (Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town), SP 5 (Garden Town Communities), Policy P 1 (Epping) as proposed to be amended, Policy P 6 as proposed to be amended (North Weald Bassett), Policy DM 2 (with respect to the proposed Air Quality Mitigation Strategy) and Policy DM 22, support the objectives of the Mayor's Transport Strategy and emerging London Plan. The Council has not identified any conflicts with respect to these transport objectives, but rather considers that the LPSV complements and supports them.

Inspector's Question 2

- 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).**

Response to Question 2

3. Since the submission of Essex County Council's (ECC) Regulation 20 Representations, the Council has agreed with ECC that rather than making an amendment to Policy T 1, paragraph 6.23 of the LPSV should be amended, as set out in the Draft Statement of Common Ground (ED10A ref. 36, page 3 of Appendix 1 draft Resolved Objections 30 January 2019), as follows:

“Education facilities should be provided in accessible locations. The Council will support proposals for dual use of school facilities and the joint provision and co-location of compatible facilities (such as education campuses or co-located sports or community facilities). Development must also ensure good accessibility to schools through the provision of safe, direct routes by sustainable/active modes of transport where feasible. The creation of a safe and attractive environment around schools will also be required.”

Inspector's Question 3

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

Response to Question 3

4. This information is currently set out in the Epping Forest District Council Local List of Validation Requirements (EB912). However, the Council agrees that it would be helpful to applicants if 'signposting' to the Local List of Validation Requirements is provided as to what scale/type of development will be required to submit a Transport Statement or Assessment in accordance with Part D. The Council therefore proposes

that additional text be added after the last bullet point of paragraph 3.88 of the LPSV as follows:

“All planning applications which generate significant amounts of movement, as defined in the Council’s Local List of Validation Requirements, will be required to submit a Transport Assessment or Transport Statement.”

Inspector’s Question 4

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?

Response to Question 4

5. Different parts of Policy T 1 are intended to apply to development of different types/scales. The Council recognises that, as currently drafted, Policy T 1 is not clear in this regard and that as a result of the separate Parts to the Policy there is an element of duplication. Consequently, there would be a benefit in amending the Policy to bring together Part C and Part F. There is also an opportunity to address some drafting errors. The Council therefore propose the rewording of Policy T 1 as follows:

A. The Council will work in partnership with relevant stakeholders to promote a safe, efficient and convenient transport system which will:

(i) build on the District’s strategic location, through improvements to strategic road and rail connections and other public transport networks to the wider area;

(ii) promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent safe, attractive and direct cycling and walking networks to provide a genuine alternative to the car and facilitate a modal shift;

(iii) provide opportunities to improve access to the two Town and four Small District Centres and rail stations by all modes of transport and ensure good integration between transport modes;

~~(iv)~~ manage congestion, ~~seek to reduce journey time~~ and maintain consistency in journey times;

~~(v)~~ promote and improve safety, security and healthy lifestyles; and

~~(vi)~~ improve the efficiency of the local highway network.

~~B.~~ 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.

~~C.~~ 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.

~~DC.~~ 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.

~~E-D.~~ Development will, where appropriate, ensure that transport infrastructure will be of a high quality, sustainable in design, construction and layout, and offer maximum flexibility in the choice of travel modes, including walking and cycling, and with accessibility for all potential users.

~~F-E.~~ Development will be permitted where it can be demonstrated, where appropriate, that it:

(i) does not result in a cumulative severe impact on the operation and safety of, or accessibility to, the local or strategic highway networks or compromise highway safety;

(ii) mitigates impacts on the local or strategic highway networks and London Underground station infrastructure within the District, arising from the development itself or the cumulative effects of development, through the provision of, or contributions towards, necessary transport improvements, including those secured by legal agreement, subject to viability considerations;

(iii) protects and, where appropriate, enhances access to Public Rights of Way;

(iv) provides appropriate parking and servicing provision, in terms of amount, design and layout and cycle storage arrangements, in accordance with adopted Parking Standards and which mitigates any impact on on-street parking provision within the locality. Reduced car parking, including car free, development in sustainable locations will be supported; ~~and~~

(v) ensures that, ~~where appropriate,~~ development proposals provide a coordinated and comprehensive scheme approach with layouts that are compatible for all potential users in terms of their safety, suitability, convenience and attractiveness and which ~~that~~ does not prejudice the future provision of transport infrastructure on and through adjoining sites, and integrate with existing transport networks

GF. In order to accommodate the use of low emission vehicles to support improvements in air quality within the District the provision of electric vehicle charging points will be required within all new developments which make provision for car parking for vehicles.

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

Inspector's Question 1

- 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?**

Response to Question 1

6. The Council does not consider that it is necessary to list the particular schemes for which land is required to be safeguarded as these may change over time and may, through more detailed design work, subsequently not require land outside of the highway boundary. Where appropriate, such schemes as currently known, are identified within the site specific policies of the Plan, or within the Infrastructure Delivery Plans for the District and for the Harlow and Gilston Garden Town.
7. As set out in the Matter 8 Hearing statement (see paragraphs 35 and 36) the Garden Town authorities have agreed an overarching plan showing the indicative route for the Sustainable Transport Corridor for the Harlow and Gilston Garden Town in the Draft Transport Strategy (EB1408 – see plan on page 15) and the Council therefore proposes to insert the Plan directly after Map 2.1 on page 39 as Map 2.2. The routes for the Corridors will also be included within the Policies Map as safeguarded routes. In addition, the Council proposes to insert the following additional text into Policy SP 5 after Part E:

“Land will be safeguarded for the Sustainable Transport Corridors in accordance with Map 2.2 and the Policies Map. Development proposals and Strategic Masterplans will be required to safeguard land accordingly.”

APPENDIX A: Examination documents referred to in this statement

Reference	Name	Author	Date
ED10A	Draft Statement of Common Ground between EFDC and ECC – Appendix 1 draft resolved objections	EFDC & ECC	2019
EB912	EFDC Local List of Validation Requirements	EFDC	2019
EB1408	Harlow and Gilston Garden Town Draft Transport Strategy	Harlow and Gilston Garden Town	2019
19STAT0009	Transport for London Regulation 19 Representations	Transport for London	2018