

**SUPPLEMENTARY REPORT FOR  
MEETING OF HARLOW COUNCIL  
7.30 pm on Thursday 10 December 2020  
Zoom - Online**

**AGENDA**

10. Reports from Officers

a) Adoption of Harlow Local Development Plan (Pages 2 - 368)

This pack contains all documents for Item 10a, with the exception of Appendix 5 (Policies Map) which has been published as Supplementary Agenda 2.

**REPORT TO:** FULL COUNCIL

**DATE:** 10 DECEMBER 2020

**TITLE:** ADOPTION OF THE HARLOW LOCAL DEVELOPMENT PLAN

**LEAD OFFICER:** ANDREW BRAMIDGE, HEAD OF ENVIRONMENT AND PLANNING (01279) 446410

**CONTRIBUTING OFFICERS:** PAUL MACBRIDE, FORWARD PLANNING MANAGER (01279) 446258

**RECOMMENDED that Full Council:**

- A** Considers the content and the findings of the Inspector's Final Report into the Examination of the Harlow Local Development Plan (HLDP) as set out in Appendix 1
- B** Adopts the Harlow Local Development Plan 2011-2033 as set out in Appendix 2, incorporating the Main Modifications that accompany the Inspector's Final Report as set out in Appendix 3 and other additional Minor Modifications, set out in Appendix 4.
- C** That in adopting the HLDP, subject to recommendation B, the Council adopts the Policies Map, set out in Appendix 5 in accordance with changes set out in Appendices 3 and 4, that will provide the spatial expression of the policies and proposals set out in the Plan.
- D** Notes that on adoption of the HLDP 2011-2033 the following Development Plan Document is revoked and should not be used for decision making:
  - a. Saved policies of the Adopted Replacement Harlow Local Plan (July 2009)
- E** Notes the content of the Sustainability Appraisal (SA) Post Adoption Statement (PAS) and Habitats Regulations Assessment (HRA) Post Adoption Statement, presented in Appendices 6 and 7, and publish these Statements alongside the adopted HLDP 2011-2033 in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- F** Delegates authority to the Head of Environment and Planning, in consultation with the Portfolio Holder for Environment and the Chair of the Local

Development Plan Panel, to make any necessary, non-consequential and minor textual, presentational or layout amendments to the Harlow Local Development Plan 2011-2033 (Appendix 2) and Policies Map (Appendix 5)

## **BACKGROUND**

1. The Council, as Local Planning Authority, is required to prepare a Development Plan (The Harlow Local Development Plan) that sets out strategic priorities and policies that will shape growth and development in the district until 2033, and which will be used as a material consideration in the statutory determination of planning applications. If an up to date development plan is not in place this could expose the Council to the risk of intervention by the Secretary of State who has default powers to prepare, or give direction to have, a plan prepared on behalf of an authority.
2. The Harlow Local Development Plan 2011-2033 (the Plan) has been prepared to provide the statutory spatial planning framework that will shape the future growth and development of the town, in order to meet identified housing, employment and other development needs, including the provision of infrastructure, balanced against the need to protect key environmental assets. The Plan will provide the planning framework against which the Council will consider and determine planning applications.
3. The spatial vision, strategic objectives, policies and proposals set out in the Plan provide the land use planning expression of the objectives of the Harlow Corporate Plan. As well as setting out how Harlow will develop over the plan period it will set out a policy framework that will aim to address climate change as well as providing a platform to secure regeneration across the town. The Plan also provides a framework to reinforce the objectives and vision of the Harlow and Gilston Garden Town. Upon adoption the policies in the Plan will replace the saved policies of the Council's existing Adopted Replacement Harlow Local Plan (July 2006).
4. The Plan has been prepared over a number of stages, in accordance with the requirements set out in Town and Country Planning (Local Planning) Regulations 2012 (as amended), the National Planning Policy Framework (NPPF, 2012) and Planning Policy Guidance. Upon the completion of these stages, and following a resolution at the Council meeting of the 13 September 2018, the Pre-Submission version of the Harlow Local Development Plan (May 2018) was submitted to the Secretary of State for Examination on 19 October 2018. The formal hearing sessions relating to the Examination in Public of the Plan took place between 28 March and 4 April 2019.

5. After the formal hearings ended, and following the consideration of evidence and matters that were raised, the Inspector wrote to the Council on a number of occasions to seek clarification on a number of matters. This culminated in the Inspector writing to the Council on 17 December 2019 setting out the Main Modifications that he considered necessary to be made, in order to find the Plan sound and legally compliant. These modifications were required by the Inspector to be made to the Local Plan to render it sound and the Planning and Compulsory Purchase Act makes clear that the Plan cannot not be adopted, unless these have been made.
6. In addition, however, the Council also proposed to make a number of minor contextual and inconsequential Minor Modifications to the Plan. Some of these modifications were proposed to ensure consistency of wording with East Hertfordshire's and Epping Forest's Local Plans and Government advice and guidance. These Main and Minor Modifications were considered and approved for public consultation at Cabinet on the 27 February 2020, and where delegated authority was given to the Head of Environment and Planning, in consultation with the Chair of the Local Development Panel, to forward any consultation responses received to the Planning Inspectorate.
7. The Council was obliged, therefore, to undertake formal public consultation on his behalf on these Main Modifications, together with an updated Sustainability Appraisal and Habitats Regulation Assessment. This was undertaken between the 12 March and 31 May 2020. The normal statutory consultation period of six weeks was extended by one month to take account of the contingencies that arose out of the Covid-19 Pandemic. As well as the consultation documentation material being available online, hard copies were also made available upon request. Upon completion of the consultation all the responses that were received were forwarded to the Planning Inspectorate for the Inspector's consideration on the 15 June 2020.
8. The Inspector's Report on the Examination of the Local Plan has now been received (dated 5 November 2020), and subject to incorporating his Main Modifications (MM), and the Minor Modifications suggested by the Council, and consequential changes to the Policies Map being made, the Inspector concluded that the Plan is sound and provides an appropriate basis for the planning of the area. The Plan is, therefore, presented to Council with a recommendation that it should be adopted as the Development Plan for the Council's administrative area.

## ISSUES/PROPOSALS

### Inspector's Report

9. The Inspector's report sets out his assessment of the Plan against the tests of Section 20(5) of the Planning & Compulsory Purchase Act 2004, as amended (the 2004 Act).

10. His first consideration was whether the Plan's preparation had complied with the Duty to Co-operate (DtC). In this respect he had regard to the details set out in the submitted DtC Compliance Statement (Regulation 22 of the Town and Country Planning (Local Planning)(England) Regulations 2012), the preparation of Memorandums of Understanding between Harlow Council and various partner bodies and organisations, the preparation of joint technical work and the establishment of the Co-operation for Sustainable Development Board in 2014. Based upon this he has confirmed that he was satisfied that the Council had engaged constructively, actively and on an on-going basis in the preparation of the plan and that the DtC has, therefore, been met.

11. His second consideration was whether the Plan was sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (NPPF) makes clear in paragraph 182 that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. In making his assessment in respect of legal compliance he concluded that he was satisfied that the various consultations undertaken were carried out in compliance with the Council's Statement of Community Involvement and relevant national planning legislation. He was also satisfied that the Sustainability Appraisal and Habitats Regulation Assessment, undertaken to support the Plan, met the legal requirements, including the Conservation of Habitats and Species Regulations 2017. In addition he noted that the Plan included policies designed to secure that the development and use of land in the local planning authority's area contributed to the mitigation of, and adaptation to, climate change. In this respect he concluded the plan met the statutory objective in Section 19 (1A) of the 2004 Act.

12. In assessing further the soundness of the Plan the Inspector identified and considered a number of issues. These are highlighted as below:

#### **Issue 1 – Whether the plan is justified, positively prepared and consistent with national policy in relation to the overall provision of housing**

13. He reviewed and considered the basis of the objectively assessed needs for housing in the District, including that set out for the Housing Market Area

(HMA) that was informed by the Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Marketing Assessment (SHMA). In addition he had regard to updated household projections (June 2020) and further work commissioned by the HMA partners (East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils) to consider the implications of this more recent data. This work at the Inspector's request was subject to a focused consultation between 8 September and 25 September 2020.

14. He concluded that the results formed a robust analysis of the latest available information and did not warrant any change in the housing requirement proposed in the Plan. In this respect he noted that MM2 is required to the Plan in order to provide further explanation and incorporate updated figures in the explanatory text.
15. With specific regard to the housing requirement for Harlow, as set out in the Plan, the Inspector noted that this reflected the need to assist in the delivery of more affordable housing and to support the regeneration of the town. However, given the lead time to bring forward the large Strategic Housing Site East of Harlow and land at the existing Princess Alexandra Hospital and further development at Newhall, a stepped requirement for the 9,200 dwellings is both necessary and justified and that accordingly Policy HS1 is amended.
16. Finally he considered housing land supply in the District. He noted that based on the available evidence the housing supply in the District is in excess of the housing requirement of 9,200 dwellings, but that this allowed flexibility to take account of possible slippage of large sites and some small sites not coming forward. With regard to the five-year land supply he noted that using the Sedgefield Method to deal with past under-delivery and taking account of the stepped requirement, there is 6.0 years supply.
17. Based on the above, therefore, he concluded that subject to MM2, MM34 and MM35, the Plan is justified, positively prepared and consistent with national policy in relation to the overall provision for housing.

**Issue 2 – Whether exceptional circumstances have been demonstrated to justify altering the Green Belt to meet the need for housing and ensure a robust long-term boundary**

18. Based upon the consideration of this matter he considered the evidence supporting the major expansion of Harlow, assembled now over many years, is both comprehensive and robust. He considered there is a proven need for significant additional housing within the West Essex/East Herts HMA, and in Harlow given its services, facilities and existing sub-regional role as the most

sustainable location for growth. The strategic location of the town on the M11, its place in the London Stansted Cambridge economic corridor, the need to regenerate the post-war new town and its own growth aspirations also justified the expansion proposals.

19. He considered that as a planned New Town there are only limited opportunities within Harlow for the development of brownfield or vacant sites and the extensive network of Green Wedges are fundamental to the character and environment of the town which justifies their ongoing protection, as evidenced by the Council's Green Wedge Review. With regard to the Strategic Housing Site East of Harlow he agreed with the Council's Green Belt Review that the site only makes a limited contribution to the purposes of the Green Belt by safeguarding the countryside around the town from encroachment, but that the M11 would provide a definitive long-term boundary in this respect. He also noted that release of the site would assist in regenerating the town by encouraging more investment in accordance with the Garden Town strategy.
20. He also noted some more minor deletions to the Green Belt were justified as exceptional circumstances, resulting in stronger inner boundaries, as well as a small addition to the Green Belt near Fennells.
21. He concluded, therefore, that subject to the explanatory paragraph inserted by MM6 and the related amendments to the Policies Map proposed by the Council, exceptional circumstances as required by the NPPF, have been demonstrated to justify altering the Green Belt to meet the need for housing and to ensure a robust long term boundary.

**Issue 3 – Whether the policy framework for the Harlow & Gilston Garden Town as a whole and the strategic site east of Harlow is justified and effective**

22. The Inspector noted that the vision for Harlow's growth now agreed between Harlow Council, Epping Forest DC and East Herts DC, together with Essex and Herts County Councils, is for the integrated and co-ordinated development of an expanded Harlow and Gilston Garden Town. He also noted that the Harlow and Gilston Garden Town Member Board, with elected representatives of the five councils and other interested parties, had now been established to lead and oversee the Garden Town initiative.
23. However, whilst the overarching Policy HGT1 is well founded, but cannot formally apply outside the plan area (i.e. the administrative area of Harlow), MM1 is necessary to clarify that the requirements in the policy represent the Council's expectation that the design and development of all four new

communities properly relate to the existing town around which they will be planned. This will also take into account Heritage Impact Assessments and the requirements relating to the necessary and identified transport interventions. The Inspector also noted that further work had been undertaken since the Local Plan was submitted such that some of the indicative routes of the sustainable transport corridors have been refined, as well as the relocation of the Princess Alexandra Hospital on a new site, support for renewable energy initiatives and increased household waste disposal capacity. In addition, in respect of key gateway entrances, he also acknowledged the need to add the Cambridge Road entrance to the town from the north so that the Plan is positively prepared.

24. With regard to the allocation of the Strategic Housing Site East of Harlow for 2,600 dwellings he noted that this was justified based on the evidence before him. In this context he considered that MM4 ensured that the site could be comprehensively brought forward through a masterplan and that key elements were identified, such as the importance of Green Wedges and Green Fingers, the need for Heritage Impact Assessments, and the provision of walking, cycling and public transport links as part of the west-east Sustainable Transport Corridor via Newhall and to the town wide network.
25. He, therefore, concluded that subject to MM1, MM4, MM11 and MM12, the policy framework set out in the Local Plan for the Harlow & Gilston Garden Town as a whole, and the Strategic Site East of Harlow is both justified and effective.

#### **Issue 4 – Whether the non-strategic housing proposals in Policy HS2 are justified and effective**

26. The Inspector noted that to supplement the Strategic Housing Site East of Harlow, Policy HS2 allocates 21 non-strategic sites across the town for housing development. He also acknowledged that as a recently developed New Town, surrounded by Green Belt and with a tight administrative boundary, there are relatively few opportunities for windfall or redevelopment schemes but a comprehensive site assessment process had identified a small number of opportunities. Following consideration of these sites, the Inspector, through MM3, sought the deletion of seven sites and an amendment to the capacity of site 4. Subject to these changes, he concluded that the non-strategic housing proposals in Policy HS2 are justified and effective. He also noted that whilst these changes reduced the housing provided through the policy, as modified by MM2, the reduction is not significant given the comfortable overall housing land supply.

**Issue 5 – Whether the economic policies in the plan and the areas to which they relate are justified, consistent with national policy and effective**

27. The Inspector noted that in addition to forming the most appropriate area to determine strategic housing needs, the West Essex/East Herts area comprising Harlow, Epping Forest, Uttlesford and East Hertfordshire districts represents the functional economic market area (FEMA) for employment planning purposes. Arising from this the joint Assessment of Employment Needs identified the preferred scenario for 51,000 additional jobs over the plan period 2011-33 for the FEMA as a whole and within this 13,400 for Harlow district. In order, however, to provide clarity across the split of B1 uses and to promote and protect the most appropriate uses on the available employment, especially with regard to policies ED1 and ED2, he has endorsed the modifications set out in MM5. He also noted that the Pearson site near Harlow Town station, within the area of employment land protected under Policy ED2, has recently been redeveloped for residential purposes. The site should now be excluded and the necessary change to the Policies Map had been proposed by the Council.

28. He therefore concluded that, subject to MM5, the economic policies in the Plan and the areas to which they relate are justified, consistent with national policy and effective.

**Issue 6 - Whether the environmental policies in the plan and the areas to which they relate are justified, consistent with national policy and effective**

29. Having reviewed the environmental policies in the Plan the Inspector recommended that to ensure consistency with national policy, and that they are effective, that the amendments set out in MM8 are made which expand Policy WE2 to refer to the Green Belt, and its five purposes. In addition this amendment also recognised the contribution that Green Wedges and Green Fingers make to the network of green infrastructure across the town.

30. He also considered it necessary to amend Policy WE3 to reflect the hierarchy of the different levels of protection afforded to international, national and local sites for consistency with paragraph 113 of the NPPF. This was reflected in MM9.

31. The Inspector also noted that the HRA indicated that the development proposed in the plan could cause, in the absence of mitigation, adverse effects on the integrity of Epping Forest Special Area of Conservation as a result of increased air pollution and recreational pressure. In addition, emerging evidence suggested that development could adversely affect the integrity of Hatfield Forest Site of Special Scientific Interest as a result of

increased recreational pressure. To ensure the Plan is effective and new development in Harlow takes these impacts into account, he considered that MM10 was necessary in order to add an additional policy to the Plan, WE3a (renumbered WE4 in the adoption version). He also indicated that this would satisfy the requirements of the Conservation of Habitats and Species Regulations 2017.

32. This will ensure impacts on wildlife sites outside the District are properly considered with a project level HRA prepared if required. The policy requires adherence to relevant mitigation strategies, as and when adopted and sets out the potential avoidance and mitigation measures that may be required.

33. The Inspector concluded, therefore, that subject to MM8, MM9 and MM10 the environmental policies in the plan and the areas to which they relate are justified, consistent with national policy and effective.

**Issue 7 – Whether the development management policies in the plan are justified, effective and consistent with national policy**

34. The Inspector also considered the suite of Development Management Policies contained in the Plan and endorsed a number of Main Modifications in order to ensure the Development Management Policies are justified, effective and consistent with national policy. These are summarised below:

- a) MM13 makes the necessary changes to Policy PL1 to refer to the Essex Design Guide and to ensure consistency with the NPPF thus ensuring that the Plan is effective.
- b) MM14 will ensure that Policy PL3 encourages development to standards recommended by the UK Green Building Council in order to respond to the need to reduce greenhouse gas emissions under the Climate Change Act 2008 and to comply with Section 19 (1A) of the 2004 Act.
- c) MM15 will ensure the Plan is consistent with national policy and will be effective by inserting a new Development Management Policy (PL4 in the adoption version) in respect of assessing proposals in the Green Belt.
- d) MM16 is necessary to Policy PL4 (renumbered PL5 in the adoption version) to ensure that proposals for the replacement, alteration or extension of existing buildings in Green Wedges or Fingers do not detract from the role or function of the designation or result in a disproportionate addition to the original building.

- e) MM17 is necessary to Policy PL 8 (renumbered PL9 in the adoption version) in order to seek a net gain in biodiversity, to recognise the hierarchy of designated sites, to conserve and enhance such assets and if necessary for proposals to include mitigation or compensatory measures.
- f) MM18 and MM19 are necessary in order to strengthen the effectiveness of Policies PL9 and PL10 (renumbered PL10 and PL11 in the adoption version) in relation to pollution, contamination, flooding and sustainable drainage
- g) MM20 is necessary to Policy PL 11 (renumbered PL12 in the adoption version) for consistency with national policy in relation to the significance of assets, heritage statements, archaeological sites, heritage assets at risk and enabling development
- h) MM21 to Policy H3 is necessary to require an early review of the policy to assess whether an undue concentration of HMO's have had a detrimental impact on an area.
- i) MM22 to Policy H5, in relation to adaptable housing, is required in respect of , the requirement for major developments to include homes to Part M4(3) (wheelchair users) in order to provide flexibility, and to refer to affordable housing only, and both requirements made subject to practical or viability constraints in order to accord with national policy.
- j) MM23, to Policy H6, is necessary in order to specify the full range of housing types and to apply the latest SHMA figures flexibly.
- k) MM25 to Policy H9 is necessary to remove the 5% figure in respect of serviced self or custom build dwellings in favour of a phase by phase negotiation to secure a continuous supply of plots based on the number of registrations over the plan period.
- l) MM26 to Policy PR7 is necessary to allow developers and the Council to agree an appropriate marketing period for large town centre retail units prior to any sub-division.
- m) MM27 to Policy L1, and in order for the policy to be justified, makes the requirements for the provision of recreational facilities within major development, subject demonstrable need and this may include the upgrading of existing facilities.

- n) MM28 to Policy L3, in respect of public art, is necessary to make exception where impractical or for viability reasons and to encourage discussion as to its form in each case.
- o) MM29 sets out a new Health and Wellbeing policy, L4, in order to deliver growth that has a positive impact in terms of encouraging physical exercise, health care and community facilities, healthy eating and good quality design.
- p) MM30 is necessary in order to set out the transport modal hierarchy and strengthen Policy IN1 to reduce the use of the car and provide public transport services.
- q) MM31 is necessary to be made to Policy IN2 to ensure the severe residual impact test is applied in line with national policy in paragraph 32 of the NPPF.
- r) MM32 to Policy IN4 would improve the policies effectiveness in ensuring major developers provide high quality broadband links.
- s) MM33 to Policy IN6 is necessary in order to clarify when financial contributions are acceptable and how viability issues will be taken into account in decision making.

## **Conclusion**

35. In accordance with the regulations and guidance the publication of the Inspector's Report marks the end of the Examination process, and given his conclusions and recommendations, the Plan is legally compliant and sound, subject to the Modifications referred to above. The Council can now adopt the Plan to ensure that it has up to date planning policies in place in an adopted statutory Development Plan to shape and guide future development and to meet the identified needs for homes, jobs and supporting infrastructure across the District.
36. It is noted, and in accordance with the regulations, the Modifications set out in the Inspector's Report are 'binding' on the Council and that should the Plan not be adopted the Secretary of State has default powers of direction with regard to the non-adoption of a local plan and can intervene in plan-making where councils do not prepare or revise Development Plans.
37. Once adopted the Plan will form the Development Plan for Harlow in addition to the Essex Minerals Local Plan (2014) and the Essex and Southend-on-Sea Waste Local Plan (2017) both prepared by Essex County Council and the relevant planning authority for Minerals and Waste matters in the County.

38. Finally upon the date of formal adoption by the Council there is a six-week period for a judicial review challenge in the High Court, by virtue of the Planning and Compulsory Purchase Act 2004, by parties who consider the adoption of the Plan has been made illegally, irrationally or does not meet the procedural requirements.

## **IMPLICATIONS**

### **Environment & Planning**

As set out in the report.

Author: **Andrew Bramidge, Head of Environment & Planning**

### **Finance (Includes ICT)**

None specific.

Author: **Simon Freeman, Head of Finance and Property and Deputy to the Chief Executive**

### **Housing**

As set out in the report.

Author: **Andrew Murray, Head of Housing**

### **Community Wellbeing (includes Equalities and Social Inclusion)**

The Local Development Plan provides the basis and confidence for future regeneration, economic and housing growth, enabling greater opportunity for increased prosperity and community wellbeing.

Author: **Jane Greer, Head of Community Wellbeing**

### **Governance (includes HR)**

The statutory framework for the adoption of the Local Plan is set out in the Planning and Compulsory Purchase Act 2004, the Act sets out the stages that the Council must go through in order to adopt the Local Plan. Section 23 requires the plan to be adopted, with modifications, by resolution of the Council.

The Inspector has confirmed that he was satisfied that the Council has met its duties under Regulation 22 of the Town and Country Planning (Local Planning)(England) Regulations 2012 (Duty to Cooperate) and that the plan, with modification, is compliant with relevant national planning legislation and regional strategy.

Author: **Simon Hill, Head of Governance**

## **Appendices**

Appendix 1 – Inspector’s Final Report

Appendix 2 – Harlow Local Development Plan 2011-2033  
Appendix 3 – Main Modifications  
Appendix 4 – Minor Modifications  
Appendix 5 – Policies Map (included in Supplementary Agenda 2)  
Appendix 6 – Sustainability Appraisal (SA) Post Adoption Statement (PAS)  
Appendix 7 – Habitats Regulations Assessment (HRA) Post Adoption Statement  
Appendix 8 – Council’s HLDP Adoption Statement

### **Background Papers**

None.

### **Glossary of terms/abbreviations used**

DtC – Duty to co-operate  
FEMA – Functional Economic Market Area  
HLDP – Harlow Local Development Plan  
HMA – Housing Market Area  
HRS – Habitats Regulations Assessment  
NPPF – National Planning Policy Framework  
SA – Sustainability Appraisal  
SHLAA – Strategic Housing Land Availability Assessment  
SHMA – Strategic Housing Marketing Assessment

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# Report to Harlow Council

**by David Reed BSc DipTP DMS MRTPI**  
**an Inspector appointed by the Secretary of State**  
**Date 5 November 2020**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Harlow Local Development Plan**

The Plan was submitted for examination on 19 October 2018

The examination hearings were held between 28-29 March and 2-4 April 2019

File Ref: PINS/N1540/429/1

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## Abbreviations used in this report

DtC	Duty to Co-operate
DC	District Council
Dpa	dwellings per annum
FEMA	Functional Economic Market Area
Herts	Hertfordshire
HLDP/the plan	Harlow Local Development Plan
HMA	Housing Market Area
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
MM	Main Modification
MoU	Memorandum of Understanding
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SHMA	Strategic Housing Market Assessment
2004 Act	Planning & Compulsory Purchase Act 2004 (as amended)
2006 Local Plan	Replacement Harlow Local Plan 2006

## **Non-Technical Summary**

This report concludes that the Harlow Local Development Plan provides an appropriate basis for the planning of the district provided that a number of main modifications [MMs] are made to it. Harlow Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

All the MMs concern matters that were discussed at the examination hearings or in writing and were published for public consultation during a ten-week period from 12 March to 31 May 2020. The Council carried out sustainability appraisal (SA) of the MMs and an update to the Habitats Regulation Assessment (HRA) was also prepared. I have recommended the inclusion of the MMs in the Plan after considering all the representations made in response to consultation on them, the SA and HRA update. A small number of changes to the MMs were made as a result of this process. Subsequently a specific consultation on housing need was carried out from 9 to 25 September 2020 which informed a further change to MM2.

The Main Modifications can be summarised as follows:

- An adjustment to the objectively assessed need for housing;
- Clarification of the housing requirement, inclusion of a stepped trajectory and updated housing land supply figures;
- Non-strategic amendments to the land to be deleted from the Green Belt, and one addition;
- Amendments to the policy framework for the Harlow & Gilston Garden Town as a whole and the strategic site east of Harlow;
- Deletion of some non-strategic housing sites;
- Clarification of the employment land policies;
- Amendments to Green Wedge and Green Finger designation and the policies which apply to them;
- New policies protecting the Green Belt and safeguarding wildlife sites outside the district;
- Clarification of the permissible uses on allocated employment land and an amendment to the area safeguarded for employment use; and
- Amendments to development management policies and a new policy relating to health and wellbeing.

## Introduction

1. This report contains my assessment of the Harlow Local Development Plan (HLDP/the plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 as amended (the 2004 Act). It considers first whether the Plan's preparation has complied with the duty to co-operate (DtC). It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (NPPF) makes clear in paragraph 182 that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The NPPF was revised in July 2018 and further revised in February 2019. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The HLDP submitted in October 2018 is the basis for my examination. This is the same as the 'Pre-Submission Publication' document published for consultation in May 2018.
4. On adoption the HLDP will supercede the Replacement Harlow Local Plan which was adopted in 2006 (the 2006 Local Plan).

## Main Modifications

5. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings or in writing, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2** etc, and are set out in full in the Appendix.
6. Following the examination hearings the Council prepared a schedule of proposed MMs and carried out sustainability appraisal (SA) of them. The MM schedule was subject to public consultation for ten weeks from 12 March to 31 May 2020. The consultation was accompanied by the SA report and an update to the Habitats Regulation Assessment (HRA). I have taken account of the consultation responses together with the updated SA and HRA in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the MMs and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the MMs as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken. Where necessary I have highlighted these amendments in the report.

7. As explained in paragraph 35 below, a further period of consultation on the September 2020 housing need report was carried out over two weeks from 9 to 25 September 2020. Nine responses were received which have been taken into account in reaching a conclusion on objectively assessed need, as a result of which the figure in the submitted plan has been amended by a revision to **MM2**. However, this does not affect the housing requirement in the submitted plan.

### **Policies Map**

8. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map is the same as the 'Pre-Submission Publication Policies Map' published in May 2018.
9. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are justified. These further changes to the policies map were published for consultation alongside the MMs in the document 'Schedule of Amendments to Policies Map'.
10. When the plan is adopted, in order to comply with the legislation and give effect to the plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the 'Pre-Submission Publication Policies Map' together with the further changes published alongside the MMs in the 'Schedule of Amendments to Policies Map'. Following consultation one amendment has been made to these changes as described in paragraph 52 below.

## **Public Sector Equality Duty**

11. Throughout the examination I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of traveller sites to meet need and accessible and adaptable housing.

## **Assessment of the Duty to Co-operate**

12. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with the duty to co-operate (DtC) imposed on it by section 33A in respect of the plan's preparation. The Council is obliged to co-operate with relevant local authorities and other prescribed bodies in relation to cross boundary strategic matters in order to maximise the effectiveness of the plan.
13. The Council prepared a DtC Compliance Statement which set out the local authorities where the duty most directly applies and other prescribed bodies with whom it has worked to prepare the plan. The statement describes the on-going engagement and liaison that was undertaken to prepare the plan and includes four memoranda of understanding (MoU) which have been entered into to ensure strategic issues are addressed. In addition, a series of Statements of Common Ground (SOCG) confirm the level of co-operation that has been involved and demonstrate there are no significant areas of dispute.
14. Harlow is a former New Town with tight administrative boundaries but offers an important opportunity for strategic growth in a key location on the M11 corridor between London, Stansted Airport and Cambridge. This makes co-operation with other bodies particularly important and led to the establishment of the Co-operation for Sustainable Development Board in 2014 including authorities in the East Hertfordshire (Herts)/West Essex/North London area. Within this wider framework for co-operation, Harlow Council, East Herts District Council (DC), Epping Forest DC and Uttlesford DC, which together form the East Herts and West Essex strategic housing and functional economic market areas, have collaborated on a series of joint studies. Following agreement on major expansion around Harlow, the joint Harlow and Gilston Garden Town Board involving Harlow, East Herts and Epping Forest Councils together with other relevant bodies has been established to co-ordinate and oversee delivery.
15. During preparation of the HLDP, four main strategic matters have required co-operation, namely identifying and addressing the housing and economic needs of the East Herts/West Essex area, establishing and co-ordinating transport and other infrastructure needs, and managing the impacts of growth on the Epping Forest Special Area of Conservation (SAC).
16. In relation to housing and the economy Harlow Council, East Herts DC, Epping Forest DC and Uttlesford DC have prepared a series of Strategic Housing Market Assessments and an Assessment of Employment Needs to identify the objectively assessed needs for housing and employment and have jointly commissioned studies to assess the sustainability of potential spatial options. This work culminated in an agreed distribution of development between the four districts to be delivered through the individual local plans of each Council.

17. To assess the impact of this growth on transport, modelling led by Essex County Council demonstrated the need to deliver a range of strategic highway improvements and other measures. The MoU between the District and County Councils and Highways England, which will be kept under review, identifies the necessary schemes and commits Harlow Council and the other signatories to work together over the plan period to deliver them. Other infrastructure needs are being addressed through the joint Harlow and Gilston Garden Town Infrastructure Delivery Plan.
18. From the outset, the potential for growth in the Harlow area to adversely affect Epping Forest SAC was identified as a strategic issue that required joint working between the District and County Councils, Natural England and the Conservators of Epping Forest. In this case the MoU includes agreement to gather evidence to understand the issues and a commitment to prepare and implement joint strategies to avoid any adverse effects on the SAC.
19. I am therefore satisfied that, overall and where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the plan and that the DtC has therefore been met.

## **Assessment of Other Aspects of Legal Compliance**

20. The HLDP has been prepared in accordance with the Council's Local Development Scheme.
21. The HLDP has been prepared over a lengthy period, with an Issues and Options consultation at the end of 2010, Emerging Strategy consultation in 2014 and Development Management Policies consultation in 2017 prior to consultation on the Pre-Submission plan in May 2018. Whilst this staged approach may have been difficult to follow for some, and there was some criticism of the extent of consultation at the hearings, on the basis of the Council's comprehensive Regulation 22 Consultation Statement I am satisfied that adequate consultation on the HLDP and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
22. SA has been carried out throughout the preparation of the HLDP, including an update at the MM stage, and is adequate. This included an initial informal appraisal of the spatial options at the housing market area (HMA) level before agreement was reached on the distribution of housing between the individual districts.
23. The HRA dated March 2019 (including both screening and appropriate assessment stages) concludes that, in combination with other plans and projects, the HLDP will not adversely affect the integrity of either the Wormley-Hoddesdonpark Woods SAC or the Lee Valley Special Protection Area/Ramsar Site. In relation to the Epping Forest SAC the HRA concludes that increased recreational pressure from additional housing within the visitor catchment area (which includes a small part of the district) may affect its integrity without mitigation. Natural England is working with the relevant parties to draw up a suitable mitigation strategy and a new policy in the HLDP (Policy WE3a, see issue 5) will ensure proposals within the district include the necessary measures. The HRA also concludes that the increase in air pollution from traffic movements arising from the HLDP would be negligible and Natural

England accepts that in these circumstances it would not be reasonable to require mitigation. The HRA update at MM stage confirms that the plan would be strengthened by the new policy. With the policy safeguards in the modified plan I am satisfied that the HLDP, in combination with other plans and projects, will not adversely affect any European sites and the requirements of the Conservation of Habitats and Species Regulations 2017 are met.

24. The Development Plan taken as a whole, incorporating the HLDP, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
25. The plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. In particular Policy IN1 promotes sustainable transport modes and Policy PL3 as proposed to be modified would support development well above the minimum standards required by the building regulations for the conservation of fuel and power. Overall the plan meets the statutory objective in Section 19 (1A) of the 2004 Act.
26. The HLDP complies with all relevant legal requirements, including the 2004 Act and the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended).

# Assessment of Soundness

## Background

27. The purpose of the HLDP is to set out a long-term vision for the development of Harlow, a first-generation New Town developed from 1947 to a distinctive masterplan involving a series of neighbourhoods, dissected by green wedges, focussed around the town centre. Whilst this initial vision proved successful in many ways, the town now faces significant challenges to enhance the range of employment, housing, retail and other facilities, improve the skills of residents and provide the necessary infrastructure to regenerate the economic prospects of the town and make it an attractive place to live, work and visit. The HLDP aims to achieve this by providing the framework for delivering a new vision for the district as the core of a larger Harlow and Gilston Garden Town.
28. Some of the policies in the HLDP are affected by changes in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which came into effect on 1 September 2020. These changes were announced very late in the examination process and full consideration of their implications would significantly delay adoption of the plan. Whilst the implementation of some policies will be affected, they do not prevent the new regulations taking effect as intended. In the circumstances the Council consider these changes should be addressed through a review of the plan rather than causing any further delay and I agree with this approach.

## Main Issues

29. Taking account of all the representations, written evidence and the discussion that took place at the examination hearings I have identified six main issues upon which the soundness of the plan depends. Under these headings my report deals with these main issues but it does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan as many do not raise any soundness concerns.

### **Issue 1 – Whether the plan is justified, positively prepared and consistent with national policy in relation to the overall provision of housing**

#### *Objectively assessed needs for housing*

30. West Essex/East Herts represents the most appropriate Housing Market Area (HMA) to establish local housing needs and to inform the preparation of the plan. The four constituent authorities of Harlow, Epping Forest, East Hertfordshire and Uttlesford undertook a series of studies culminating in the Strategic Housing Market Assessment (SHMA) published in July 2017. Using the 2014 based household projections as the starting point, this identified an Objectively Assessed Need (OAN) for 51,700 dwellings in the HMA over the plan period 2011-33 and within this figure 7,400 for Harlow district.
31. The use of a ten-year migration trend in the 2017 SHMA rather than the five-year trend included in the official 2014 projections is justified in this instance. There is robust evidence that in-migration into the HMA in the short period between 2012-15 was exceptionally high after which it returned to the earlier more consistent level seen from 2005 onwards. In the absence of any clear

explanation for the increase and particularly the fact it was not sustained it is more credible to use the longer-term 10 year rolling average.

32. Adjustment of the migration trend in this way results in an estimated need for 45,500 dwellings in the HMA over the plan period, to which an uplift of 14% was applied, a further 6,200 dwellings, to reflect market signals. Affordability of housing in relation to incomes has deteriorated significantly since 2009. Whilst a 20% uplift is justified in some areas a 14% uplift in this SHMA would assist affordability significantly, allow continued in-migration and enable household formation rates for those aged under 35 to be no lower than in 2001 after which rates declined. This level of uplift would also be sufficient to match the resident workforce with the projected increase in jobs.
33. Therefore, using the 2014 projections as the starting point, the full OAN figure of 51,700 dwellings for the HMA and 7,400 for Harlow would be justified given the evidence and consistent with the conclusions of the East Herts District Plan examination in 2018. However, the PPG advises that local needs assessments should be informed by the latest available information. Since the 2017 SHMA two further sets of household projections have been published, 2016 based and 2018 based, so these also need to be considered in finalising the OAN.
34. The 2016 based household projections, which were available at the time of the examination hearings, indicated nearly 4,500 fewer households across the HMA by the end of the plan period but this was the result of the recent reduction in household formation rates among the young reflecting a lack of affordability. Using the 2016 based projections with longer term household formation rates results in just 600 fewer households compared to the 2017 SHMA which would not warrant any adjustment to the OAN.
35. However, the 2018 based household projections were published on 29 June 2020 and these indicate overall growth of 32,529 households for the HMA over the plan period, much lower than the 2016 based figure of 40,213 and the 2014 based figure which was 50,697. To determine how this latest projection might affect the OAN, the Councils prepared a further report, the September 2020 update, which was circulated to examination participants for any representations over a two week period.
36. The 2018 based projections include both lower birth rates and higher death rates than previously envisaged leading to a lower increase in households. There is no reason to adjust these assumptions. However, the two year migration trend used significantly underplays longer term migration patterns and as before use of the ten year average is more credible, increasing the household growth projection from 32,529 to 37,320. In addition, past under-delivery of housing has suppressed household formation since the 2001 census and an adjustment of 4,669 households is justified to allow restoration of previous household formation rates. Finally, an uplift in response to market signals of 12% is justified (2% less than the 2017 SHMA to avoid double counting of suppressed households). Converting the resulting projection into the need for new housing by applying a reasonable vacancy rate gives an OAN of 48,915 dwellings over the plan period for the HMA as a whole and, using the same methodology, 6,820 dwellings for Harlow.

37. The 2020 update figure for Harlow is thus rather less than the 7,400 dwellings identified by the 2017 SHMA. However, this results from a robust analysis of the latest available information and was not seriously disputed by consultation responses. Although, as explained below, this reduction does not warrant any change in the housing requirement proposed in the HLDP, the plan should include an OAN estimate that is justified in the light of an up to date analysis. **MM2** has therefore been amended to provide explanation and incorporate the new figures into the explanatory text.

*The housing requirement for Harlow*

38. Policy HS1 of the HLDP as submitted sets the housing requirement for the plan period at 9,200 dwellings or 418 dwellings per annum (dpa), 1,800 more than the OAN of 7,400 dwellings identified at the time. Although the 2020 update now establishes that the OAN is 6,820 dwellings, it is not proposed to reduce the housing requirement, thus increasing the additional provision to 2,380 dwellings. As the plan explains, extra dwellings are required to assist in the delivery of more affordable housing and to support the regeneration of the town. However, this additional housing would also help to meet the housing needs of the wider HMA, particularly those of Epping Forest district which is largely subject to Green Belt designation. This is an important part of the justification of the plan and **MM2** is therefore necessary to make this clear in paragraphs 7.6 and 7.23 and to ensure the plan is positively prepared.
39. The 2017 SHMA and 2020 update provide separate OAN figures for the four districts in the HMA, but the most sustainable distribution for housing within the West Essex/East Herts area is to focus development in and around Harlow. The MoU agreed in March 2017 between the Councils sets out the preferred spatial option for the HMA overall and this includes at least 9,200 dwellings within the Harlow district boundary. This preferred location for major housing development within the HMA remains appropriate notwithstanding the reduction in the OAN for Harlow.
40. The sites identified as suitable for housing within the district include a large strategic site east of Harlow, land at Princess Alexandra Hospital and further development at Newhall. However, the lead time to bring forward these sites, particularly the site east of Harlow, means a stepped requirement for the 9,200 dwellings is both necessary and justified. On this basis 361 dwellings should be provided each year in the period 2011-24 and 501 dpa between 2024-33. **MM2** amends Policy HS1 accordingly.

*Housing land supply*

41. Using the latest available information as at March 2019, there were 2,463 dwelling completions since the start of the plan period and extant planning permission for a further 4,723 dwellings. The indicative masterplan for the strategic site east of Harlow (see issue 3) with reasonable density assumptions shows that the site has a realistic capacity for 2,600 dwellings within the district and the other housing sites identified under Policy HS2 (see issue 4) have capacity for a further 834 dwellings. Housing land supply is thus 10,620 dwellings over the full plan period, comfortably in excess of the requirement of 9,200 dwellings. Recently many completions have resulted from conversions of office buildings under permitted development rights. The projected surplus

allows for flexibility, the possible slippage of large sites and some small sites not coming forward. To ensure justified figures are included in the plan, **MM2** updates the table in Figure 7.1 and **MM35** updates Appendix 2, the currently anticipated housing trajectory.

42. The five-year housing land supply position as at March 2019, using the Sedgefield method to deal with past under-delivery and taking account of the stepped requirement, is 6.0 years supply. With a persistent shortfall of 425 completions having built up over the plan period to 2019, the requirement for the 2019-24 period including a 20% buffer is 2,676 dwellings. The projected supply during the five-year period is 3,229 dwellings including 2,981 dwellings from 24 sites with planning permission and 248 dwellings from the new allocations made in this plan. As a planned new town relatively few windfall sites come forward so no allowance is made for these and with most of the committed sites already under construction there is no need to apply a lapse rate in this case. To ensure justified figures are included in the plan, **MM34** updates Appendix 1 which sets out the calculation.
43. In conclusion, subject to **MM2**, **MM34** and **MM35**, the HLDP is justified, positively prepared and consistent with national policy in relation to the overall provision for housing.

## **Issue 2 - Whether exceptional circumstances have been demonstrated to justify altering the Green Belt to meet the need for housing and ensure a robust long-term boundary**

### *Background to Issues 2 and 3*

44. The strategy for significant growth in and around Harlow was first developed through the East of England Plan 2008 which in Policy HA1 proposed the renaissance of the new town as a major regional housing growth point, town centre and employment location. This included regeneration of the existing town together with urban extensions to the north and east and on a smaller scale to the south and west. The policy stated that the Green Belt around the town was to be reviewed to accommodate these urban extensions.
45. Whilst the East of England Plan was subsequently revoked, the proposal has been pursued with joint strategic spatial option and site assessment studies concluding there are suitable sites in and around Harlow to accommodate about 16,100 dwellings of the overall SHMA requirement providing sustainable travel and other infrastructure is put in place. This figure and its distribution between the districts was confirmed in the MoU of March 2017. It includes renewal and redevelopment within the town together with a strategic site east of Harlow for about 3,350 dwellings (split between Harlow and Epping Forest districts), two other strategic sites south and west of the town within Epping Forest district to accommodate about 1,050 and 2,100 dwellings respectively and major developments comprising about 10,000 dwellings in the long term in the Gilston area to the north of Harlow in East Hertfordshire district. These linked proposals, to be planned comprehensively as the Harlow and Gilston Garden Town, are now included in the Councils' local plans.
46. The evidence supporting the major expansion of Harlow, assembled now over many years, is both comprehensive and robust. There is a proven need for significant additional housing within the West Essex/East Herts HMA, and in

this area Harlow with its services, facilities and existing sub-regional role is the most sustainable location for growth. With suitable investment in sustainable transport, the travel needs of the new development can be accommodated. The strategic location of the town on the M11, its place in the Cambridge-Stansted-London economic corridor, the need to regenerate the post-war new town and its own growth aspirations also justify the expansion proposals.

*Alterations to the Green Belt*

47. It follows from the above arguments that there are strong reasons to alter the Green Belt boundaries which currently tightly encircle the town. Whilst there are some settlements beyond the Green Belt within East Hertfordshire and Uttlesford districts which form part of the HMA, these are less sustainable locations for the major development which is needed as evidenced by the SA carried out at HMA level. As a planned new town there are only limited opportunities within Harlow for the development of brownfield or vacant sites (the few that have been identified are allocated under Policy HS2) and the extensive network of Green Wedges are fundamental to the character and environment of the town which fully justifies their ongoing protection.
48. Within the HLDP the main proposal is to delete Green Belt designation from the land east of Churchgate Street and Newhall as far as the M11 motorway to allow for the east of Harlow strategic housing site. The Council's Green Belt Review published in May 2016 concluded that this area only makes a limited contribution to the purposes of the Green Belt by safeguarding the countryside around the town from encroachment, and the M11 would provide a definitive long-term boundary in this respect. Harlow is a modern planned town rather than historic in character or an unrestricted sprawl, and the area concerned does not prevent neighbouring towns merging into one another. In this case, release of the site would assist in regenerating the town by encouraging more investment in accordance with the Garden Town strategy.
49. There are complementary proposals in the Epping Forest District Local Plan, currently under examination, to delete Green Belt designation from further land east of Harlow to the north of Moor Hall Road, also from the land where the Latton Priory and Water Lane strategic housing sites are proposed south and west of the town. The Water Lane proposal justifies deletion of the Green Belt within Harlow district from the amenity land west of Brookside/Broadley Road and Harolds Grove as these areas would be cut off from the wider Green Belt by the strategic site. The deletion of Harolds Grove was omitted from the submitted HLDP policies map but this is now proposed by the Council.
50. For these reasons there are exceptional circumstances to justify deletion of Green Belt designation from the land east of Churchgate Street/Newhall, west of Brookside/Broadley Road and Harolds Grove in order to allow strategic housing development. This is consistent with the deletion of Green Belt designation from land in the Gilston area north of the town which has already been endorsed by the examination of the East Herts District Plan.
51. In addition to the alterations to allow for strategic housing sites around the town, the HLDP proposes a number of other adjustments to the boundaries of the Green Belt following the Green Belt Review dated May 2016. Two of these, the deletion of small areas east of Markwell Wood and north of Harlow

Common, would substitute physical features for arbitrary boundaries nearby and have no practical implications. The third, deletion of the Hanns caravan storage compound and related buildings recognises the development of the site and substitutes a strong physical boundary for the long term. These three minor boundary changes therefore meet the exceptional circumstances test. In the case of the area east of Markwell Wood the site should be re-designated as part of the Green Wedge to the north.

52. As submitted, the HLDP proposes a series of other deletions from the Green Belt on the periphery of the town, in some cases to re-designate these as Green Wedges or Green Fingers. However, the NPPF emphasises the permanence of the Green Belt once designated and its deletion without exceptional circumstances is not justified. Amendments to the policies map are therefore necessary to retain Green Belt designation on land north of Elizabeth Way, the lakes south of Greenway, the landscaping strip along the M11 east of Church Langley, land north of Gilden Park and the woodland strip alongside the River Stort. Following consultation, the area retained south of Greenway should exclude the small parcel surrounded by development on three sides south of the Business Centre as this built up setting comprises exceptional circumstances that justify its deletion.
53. Whilst some inappropriate development has been permitted in the Green Belt north of Gilden Park including sports facilities, earthworks and allotments due to some loss of openness, the need for ancillary development to facilitate the new housing estate amounted to very special circumstances. This does not however justify the deletion of the area from the Green Belt as much of its essential openness will still be retained.
54. Following the deletion of the housing allocation east of 144-154 Fennells (see issue 4) there are exceptional circumstances which justify adding the small site to the Green Belt to ensure the designation follows clear physical features on the ground in the interests of a robust long term boundary. A proposed change to the policies map therefore includes the site within the designation to ensure a justified boundary.
55. In conclusion, subject to the explanatory paragraph inserted by **MM6** and the related amendments to the policies map proposed by the Council, exceptional circumstances as required by the NPPF have been demonstrated to justify altering the Green Belt to meet the need for housing and ensure a robust long-term boundary.

### **Issue 3 - Whether the policy framework for the Harlow & Gilston Garden Town as a whole and the strategic site east of Harlow is justified and effective**

#### *Policy framework for the Harlow and Gilston Garden Town*

56. As explained in paragraphs 44-46 above, the strategy for substantial strategic growth in and around Harlow has been developed over a lengthy period with a series of joint studies confirming the potential of the area. These included the Harlow Area Study in 2005, Generating and Appraising Spatial Options for the Harlow Area in 2010 and Harlow Strategic Site Assessment in 2016 which informed the areas for expansion which are now proposed. Supporting studies

undertaken include a Landscape and Environment Study, Green Infrastructure Plan and Essex County Council transport modelling.

57. The vision for Harlow's growth now agreed between Harlow Council, Epping Forest DC and East Herts DC, together with Essex and Herts County Councils, is thus for the integrated and co-ordinated development of an expanded Harlow and Gilston Garden Town. This would comprise complementary new garden town communities to the north, east, south and west of the town linked to and focussed around the existing services and facilities of Harlow, including its town centre, transport nodes, industrial and employment areas, hospital and wide variety of community facilities. The Harlow and Gilston Garden Town Member Board with representatives of the five councils and other interested parties has now been established to lead and oversee the Garden Town initiative.
58. The four new garden town communities will be developed around Harlow but within three administrative districts and under the policy framework of three separate local plans. The proposals for the Gilston area are already included in Policies GA1 and GA2 of the adopted East Herts Local Plan and those for the Water Lane, Latton Priory and part of the East of Harlow communities in Policies SP4 and SP5 of the Epping Forest District Local Plan currently under examination. Although much of the new development would be outside the administrative boundary of Harlow, and thus outside the direct remit of the HLDP, it would be focussed on the town and the plan thus has a key role in ensuring that the overall Garden Town is developed in a comprehensive and sustainable manner. The overarching Policy HGT1 is therefore well founded but cannot formally apply outside the plan area. To be justified **MM1** is necessary to clarify that the requirements in section 2 represent the Council's expectation that the design and development of all four new communities properly relate to the existing town around which they will be planned.
59. To complement the formal policy framework the five councils have prepared a suite of supplementary guidance documents and studies including the Garden Town Vision, Garden Town Design Guide, Garden Town Infrastructure Delivery Plan, Strategic Viability Assessment, Transport Strategy, Sustainable Transport Corridors Strategy and Housing Strategy. Some of these were finalised after the Pre-Submission version of the HLDP but opportunities for comment were given during the hearings and prior to publication of the MMs.
60. Some amendments to Policy HGT1 are necessary to secure its effectiveness in ensuring the new garden town communities complement the existing new town and its original masterplan principles. The expansion of the town should take full account of topography and landform, protect or enhance landscape features and extend the existing network of Green Wedges/Green Fingers as these are all fundamental to its character. Heritage Impact Assessments are also required to inform scheme design and the inclusion of any measures to protect wildlife sites outside the district to comply with new Policy WE3a (see issue 6). **MM1** is therefore necessary to ensure that the plan will be effective in these respects.
61. To support such a major expansion of the town significant infrastructure investment is vital and a critical element of this is the delivery of sustainable transport options to accommodate travel demand. Transport studies have

demonstrated that satisfactorily accommodating 16,100 or so dwellings in new communities around the town depends on a step change in travel behaviour with significant modal shift being facilitated by the new developments. The aim is for 60% of all journeys within the new garden communities and 50% in the existing area of Harlow to be undertaken by sustainable modes and the delivery of north-south and west-east Sustainable Transport Corridors linking the new communities to each other and the town centre are an essential part of this strategy. The relationship of each development to ambitious transport interventions such as these, improvements to Junction 7/7a on the M11 and other infrastructure will need to be agreed and a fair and reasonable contribution made in each case in accordance with Policy IN6 and the NPPF tests. To ensure the plan is effective **MM1** is necessary to amend Policy HGT1 to make these important requirements clear.

62. Policy HGT1 sets out the broad principles for development of the garden town communities and this provides for some flexibility. General conformity rather than strict adherence is required with the Vision and Design Guide documents. The involvement of the Independent Quality Review Panel is important to secure development of a high standard. With relevant policies in three local plans being finalised at different times there are inevitably some differences in wording but the policies are broadly consistent.
63. The strategic infrastructure necessary to ensure the Garden Town is developed in a sustainable way has been identified through a series of reports including the Delivery Study for Harlow and Surrounding Area: Infrastructure Delivery Plan. This culminated in the overall Garden Town Infrastructure Delivery Plan published in April 2019. Since the preparation of the pre-submission plan further work has refined the routes of the sustainable transport corridors requiring an amendment to the policies map and to ensure an effective plan **MM11** is necessary to update the text setting out the preferred option of relocating the Princess Alexandra Hospital on a new site, support for renewable energy initiatives and increased household waste disposal capacity. The need to enhance the key gateway entrances into the town and its main employment areas has also been identified by Policy SIR2 and **MM12** is necessary to add the Cambridge Road entrance to the town from the north so that the plan is positively prepared.
64. The Strategic Viability Assessment also published in April 2019 alongside the infrastructure plan concludes the garden communities are deliverable although some flexibility around the timing of infrastructure payments and the mix of affordable housing may be necessary to ensure scheme viability. This is a realistic assessment given the information currently available.

*Policy framework for the strategic site east of Harlow*

65. Only one of the four proposed garden communities lies within the boundary of Harlow district and thus within the HLDP area, the site to the east of the town, and even this lies partly in Epping Forest district. This extensive greenfield site, between Churchgate Street/Newhall and the M11, comprises undulating farmland but is severed from the wider countryside by the motorway and thus offers a large scale but well-defined opportunity to expand the town. The area includes limited tree cover with scattered hedgerow field boundaries but also some important landscape features including the Water Tower on high ground

at the southern end of the site, the Grade II listed Hubbards Hall, other listed buildings along Hobbs Cross Road and Feltimores Meadow local wildlife site. The site rises to the east and south, offering wide views over the Stort Valley with the spire of St Mary's Church on Churchgate Street a particular feature. Moor Hall Road forms the district boundary with the land beyond proposed for allocation in the Epping Forest District Local Plan.

66. The potential of this area was first recognised when the expert panel who examined the East of England Plan concluded that the east side of Harlow was 'generally accepted to be the least constrained direction for growth'. The Harlow Strategic Site Assessment in 2016 also concluded that the area 'due to its comparative lack of environmental and statutory designation constraints stands out as a sustainable location for growth'. Subsequent detailed studies included in the HLDP evidence base confirm the scope for development and the lead developer has prepared a preliminary masterplan layout.
67. The available evidence thus fully justifies the allocation of the site in Policy HS3 for 2,600 dwellings within Harlow district. The adjacent land is allocated for a further 750 dwellings by Policy SP5 of the Epping Forest District Local Plan currently under examination. It is important that the two policies are broadly consistent but as they are being finalised at different times there will inevitably be some minor differences in wording. The overall site should be planned comprehensively with a single masterplan based on the principles of the Garden Town Vision and Design Guide documents and in the interests of effectiveness **MM4** is necessary to ensure that Policy HS3 makes this clear. A Statement of Common Ground between the two Councils and lead developer confirms agreement to this approach.
68. As with all the new garden town communities, it is critical that the strategic expansion of the town to the east complements the existing new town and its original masterplan principles. As such the development should take full account of the detailed topography of the area and its landscape features with a network of green spaces taking advantage of important views, the need to protect heritage assets and provide public open space as well as landscaping alongside the M11. The strategic site masterplan should include from the outset a network of Green Wedges/Green Fingers to link with the woodland south of Newhall and open land west of Churchgate Street. The latter Green Wedge is shown on the Policies Map extending east to the M11 but the final section does not follow physical boundaries on the ground and should be interpreted flexibly in discussion with the Council. To be effective **MM4** amends Policy HS3 to stress the importance of landform and the network of Green Wedges/Green Fingers.
69. There are a number of heritage assets within and near the strategic site but no Heritage Impact Assessment has been carried out to date and Policy HS3 as submitted includes no requirement to avoid or mitigate any harm to these assets. Whilst the plan includes a general policy to protect heritage assets, to ensure effectiveness **MM4** adds an additional criterion to Policy HS3 to require an assessment to inform the design of the scheme.
70. Vehicular access to the site would be provided from Gilden Way (Item 4 in Policy SIR1; also shown on the Policies Map) and across Moor Hall Road from the northern part of the site and the new roundabout linking with Junction 7a

on the M11. This important new junction is already fully funded. However, to achieve the aim of sustainable travel for the new community, the provision of walking, cycling and public transport links as part of the west-east sustainable transport corridor via Newhall and to the town wide network are critical and consequently **MM4** is necessary to ensure that these are included in Policy HS3 so that the plan is effective.

71. Further work since the publication of the Pre-Submission version of the HLDP has clarified some of the infrastructure requirements for the strategic site. This has enabled a more comprehensive list to be included in Policy HS3, in particular the site requirements for primary and secondary schools to serve the site. Complementary changes are proposed to Policy SP5 in the Epping Forest District Local Plan. To ensure that the plan is effective, **MM4** makes the necessary amendments together with the requirement to provide satisfactory water supply and waste water infrastructure and the inclusion of any measures to protect wildlife sites outside the district to comply with new Policy WE3a (see issue 6).
72. In conclusion, subject to **MM1**, **MM4**, **MM11** and **MM12**, the policy framework set out in the HLDP for the Harlow & Gilston Garden Town as a whole and the strategic site east of Harlow is justified and effective.

#### **Issue 4 – Whether the non-strategic housing proposals in Policy HS2 are justified and effective**

73. To supplement the strategic site east of Harlow, Policy HS2 allocates 21 non-strategic sites across the town for housing development. As a recently developed new town, surrounded by Green Belt and with a tight administrative boundary, there are relatively few opportunities for windfall or redevelopment schemes but a comprehensive site assessment process has identified a small number of opportunities. Following a call for sites the Strategic Housing Land Availability Assessment published in April 2014 identified 59 developable sites after which further sieving reduced the number of allocations to 21. Due to the legacy of the new town, a significant number of potential sites are in public ownership. These were assessed on the same basis as privately owned sites.
74. Policy HS2 Site 1 - this allocation proposes housing on the existing Princess Alexandra Hospital site in the town. Much of this important regional hospital operates out of old or temporary buildings developed incrementally on the site over the years and this poses operational challenges for delivering high quality clinical services for its catchment area in future. Whilst the redevelopment of the existing site remains a possibility taking account of the major growth planned in the Harlow area the preferred option gaining Government support is for the relocation of the hospital to a greenfield site adjacent to the new Junction 7a on the M11. The new site lies within the northern (Epping Forest) part of the strategic site East of Harlow and the lead developer concerned has agreed to make the site available for the purpose if required.
75. There is no dispute that the existing hospital campus can be redeveloped for housing purposes although a mental health facility on site may be retained. Taking this into account and other constraints including the character of the surroundings, a Grade II listed building, two scheduled burial mounds and protected trees, a site planning exercise suggests 550 dwellings is a more

realistic capacity for the site rather than 650 in the submitted plan. **MM3** is therefore necessary to make this change to Policy HS2 so that the figure is justified in the light of the latest information.

76. Policy HS2 proposes that four sites have their Green Wedge designation removed and are allocated for housing development instead. Given the importance of Green Wedges to the initial new town masterplan, their contribution to the character of the town and continuity through inclusion in successive local plans such a move requires special justification.
77. Site 6 (Riddings Lane) is a self-contained field with no public access lying between Hawthorns, a residential cul-de-sac and the district boundary beyond which the Latton Priory garden community is proposed. This would end its role as the rural edge of the town and would represent a significant change to its current context. In addition, the site lies to the side of the wide north-south Green Wedge to the west and the narrow Green Finger to the east, not forming part of either. Its allocation for housing is therefore justified.
78. Site 15 (Playground west of 93-100 Jocelyns) is bounded by existing housing on three sides and comprises an informal grass amenity/play area. The site is visually separated from the Green Wedge along the A414 corridor by some woodland; as a result it does not form an integral part of the Green Wedge and its exclusion from the designation is justified. However, for the reasons set out in paragraph 82 below, the allocation for housing use is not justified.
79. Site 3 (Land east of Katherines Way, west of Deer Park) comprises a large area of informal public open space which contributes to the spacious Green Wedge corridor through which the A1169 passes, an important distributor road in the town. Whilst the bank and treebelt along Katherines Way would screen the new housing to some extent, it would comprise a significant encroachment of built development into the Green Wedge and the verdant setting of the roundabout. This forms part of the green infrastructure of the town which is an important part of its character and warrants protection.
80. Similarly site 11 (Land between Second Avenue and St Andrews Meadow) is informal grassland forming part of the Green Wedge corridor through which the A1025 passes, another important distributor road. There is no boundary on the ground to distinguish the site from the area to be retained as Green Wedge and the new housing would therefore be seen as a further unduly detrimental erosion of the verdant green transport corridors in the town.
81. Site 9 (Land east of 144-154 Fennells) is a triangular area of grassland which opens out towards the open countryside to the south of the town, with the town cemetery/crematorium and extensive woodland nearby. The site was considered part of a 'special landscape area' in the 2006 Local Plan. Although adjacent to housing on one side there is no clear physical feature marking the boundary with the countryside to the south and its development would be an unduly intrusive encroachment into the rural setting of the town.
82. Proposed housing sites 5 (South of Clifton Hatch), 7 (Kingsmoor Recreation Centre) and 20 (Land between Barn Mead and Five Areas) are currently areas of informal public open space within the built-up area of the town. These allocations followed the Harlow Open Space and Green Infrastructure Study published in 2013 which assessed the value and quality of all the open spaces

in the town. This comprehensive study highlighted an overall surplus of open space in Harlow due to the legacy of the new town and concluded there may be scope for well-designed development on such land in some instances. Whilst that may be the case, the assessment of value and quality is relatively subjective and no sketch schemes have been prepared to date to inform the detailed impact of the proposals or to assist public consultation. In the circumstances there is insufficient evidence to support the positive allocation of these sites for housing. These sites should therefore remain 'white land' in the HLDP, unallocated for any purpose. The same applies to site 15, the land west of 93-100 Jocelyns, for the same reasons.

83. The remaining sites 2 (The Stow Service Bays), 4 (Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery), 8 (Evangelical Lutheran Church, Tawneys Road), 10 (Pollard Hatch plus garages and adjacent land), 12 (Coppice Hatch and garages), 13 (Sherards House), 14 (Elm Hatch and public house), 16 (Fishers Hatch), 17 (Slacksbury Hatch and associated garages), 18 (Garage blocks adjacent to Nicholls Tower), 19 (Stewards Farm), and 21 (Pypers Hatch) are previously developed sites or private land within the built up area suitable for new housing subject to suitably designed schemes coming forward. Site 10 includes an incidental area of amenity land.
84. In two cases further minor amendments are required. The front part of site 4 now has planning permission for housing reducing the remaining capacity of the site to 30 dwellings and the boundary of site 18 should be amended to exclude an important Oak tree from the allocation.
85. In conclusion, to ensure the non-strategic housing proposals in Policy HS2 are justified and effective, **MM3** is necessary to delete housing sites 3, 5, 7, 9, 11, 15 and 20 and to amend the capacity of site 4. The necessary changes to the policies map have been proposed by the Council, together with an amendment to the boundary of site 18. Subject to these changes, the non-strategic housing proposals in Policy HS2 are justified and effective.
86. Together these changes reduce the housing provided on Policy HS2 sites from 1,147 to 834 dwellings which is taken into account in the sources of housing supply set out in Figure 7.1 of the plan as modified by **MM2**. The reduction is not however significant given the comfortable overall housing land supply position set out in paragraph 41 above.

**Issue 5 – Whether the economic policies in the plan and the areas to which they relate are justified, consistent with national policy and effective**

87. In addition to forming the most appropriate area to determine strategic housing needs, the West Essex/East Herts area comprising Harlow, Epping Forest, Uttlesford and East Hertfordshire districts represents the functional economic market area (FEMA) for employment planning purposes. The four Councils accordingly commissioned the Assessment of Employment Needs published in October 2017 which identified the preferred scenario for 51,000 additional jobs over the plan period 2011-33 for the FEMA as a whole and within this 13,400 for Harlow district. The four Councils have entered a MoU to deliver the agreed distribution of employment growth.

88. The assessment of the implications for provision of employment land across the four districts indicates that a substantial proportion of forecast jobs growth would lie outside the B use class. Within the B uses, the greatest growth falls within B1a offices with growth also in the B1b, B1c and B8 categories and an overall reduction in jobs forecast within class B2. Taking account of the need to replace existing property and an uplift to allow for choice and flexibility, the estimated requirement for additional employment land across the FEMA as a whole is 10-24 ha for offices (B1a) and 68 ha for industrial uses (B1b, B1c, B2 and B8). The figures for Harlow are 2-4 ha for offices (B1a) and 16 ha for the same range of industrial uses. As submitted, paragraphs 8.10 and 8.11 of the HLDP do not split the B1 use class and for clarity this is corrected in **MM5**.
89. Policy ED1 in the HLDP allocates three sites for employment use to meet the necessary land requirement, Harlow Business Park at the Pinnacles, London Road and East Road Templefields. The Business Park is a greenfield site suitable for research and development purposes and London Road, part of the Harlow Enterprise Zone, is the subject of a Local Development Order which also promotes high quality employment uses. Harlow's economic strategy is to maintain and enhance investment in key growth sectors to diversify the current mix of jobs and it is important to protect key sites for that purpose.
90. The policy to retain these sites for B1 use is therefore justified and other uses would require strong justification, but over the plan period this may arise and for effectiveness this flexibility should be included in Policy ED1. The site at East Road is suitable for a wider range of industrial uses including B8 and for clarity this should also be made more explicit in the policy. To ensure the plan is effective **MM5** is therefore necessary to clarify Policies ED1 and ED2 to promote and protect the most appropriate uses on the available employment sites. Modified in this way I am satisfied that the HLDP provides the necessary provision and flexibility to meet the employment needs of the district and to enhance Harlow's sub-regional role within the M11 corridor.
91. The implementation of the economic policies in the plan will be affected by the changes to the Use Classes Order as explained in paragraph 28 above.
92. The Pearson site near Harlow Town station within the area of employment land protected under Policy ED2 has recently been redeveloped for residential purposes. The site should now be excluded and the necessary change to the policies map has been proposed by the Council.
93. In conclusion, subject to **MM5**, the economic policies in the plan and the areas to which they relate are justified, consistent with national policy and effective.

**Issue 6 – Whether the environmental policies in the plan and the areas to which they relate are justified, consistent with national policy and effective**

94. Despite its importance in protecting the setting of the town and restricting its outward expansion, the submitted plan only makes a limited reference to the Green Belt in Policy WE1 relating to strategic green infrastructure. To ensure the HLDP is consistent with national policy and effective, **MM8** expands Policy WE2 to refer to the Green Belt and its five purposes (see also issue 7 and MM15 which inserts a new development management policy into the plan). Changes to Green Belt boundaries are dealt with under issue 2.

95. The locally designated Green Wedges, dating back to the original new town masterplan, were the subject of the Green Wedge Review dated April 2014. This confirmed their importance as part of the heritage of the town, their contribution to its unique environment and strong support for their protection. The HLDP thus carries forward most of the land designated as Green Wedge from the predecessor local plan adopted in 2006. However, the review identified scope for the removal of some relatively small areas, for example the footprints of secondary school buildings which were built up rather than open, green spaces. Other linear areas were reclassified as Green Fingers, narrower green corridors often incorporating roads or footpaths linking wider areas of open space, and some additional Green Fingers were identified. These proposals are justified by the evidence in the Green Wedge Review.
96. As explained above, the submitted plan proposed the removal of four areas of land designated as Green Wedge and their allocation for housing under Policy HS2. In one case (Site 6) this is justified, in one case (Site 15) it is justified to remove the Green Wedge designation but not to allocate the site for housing, and in two cases (Sites 3 and 11) the designation should be retained. In addition to reinstating these sites the important area of amenity grassland west of Broadley Road/Little Cattins should be designated as Green Wedge following its deletion from the Green Belt (see issue 2). The necessary changes to the policies map have been proposed by the Council.
97. The layout of the Gilden Park housing development has now been finalised and includes an east-west linear park within the site and a strip of informal open space along the western boundary adjacent to the open space to the east of Old Road. To apply policy protection to these important areas of green space consistently with others in the district their designation as Green Finger is justified. The necessary change to the policies map has been proposed by the Council.
98. Policy WE2 sets out the roles of Green Wedges and Green Fingers as part of the network of strategic green infrastructure in the town but omits to include water bodies. To ensure the plan is effective **MM8** adds these features to recognise their contribution to Green Wedges and Green Fingers.
99. Policy WE3 aims to preserve and enhance biodiversity and geodiversity assets. However, **MM9** is necessary to amend the policy to reflect the hierarchy of the different levels of protection afforded to international, national and local sites for consistency with paragraph 113 of the NPPF.
100. As submitted the HLDP is silent on the need to take any necessary steps to safeguard the integrity of wildlife sites which lie beyond the district boundary. The HRA establishes that the development proposed in the plan could cause, in the absence of mitigation, adverse effects on the integrity of Epping Forest SAC as a result of increased air pollution and recreational pressure. In addition, emerging evidence now suggests that development could adversely affect the integrity of Hatfield Forest SSSI as a result of increased recreational pressure. To ensure the plan is effective and new development in Harlow takes these impacts into account **MM10** is necessary to add a further policy, WE3a, to the plan. This will also ensure the requirements of the Conservation of Habitats and Species Regulations 2017 are satisfied.

101. In relation to recreational pressure as a result of additional population living near the two wildlife sites, the most recent visitor surveys demonstrate that 75% of visitors to Epping Forest live within 6.2 km of its boundary, the area generally accepted to be its core catchment or zone of influence. This includes only the southern fringe of the district comprising for the most part open space and woodland. With the deletion of Policy HS2 Site 9 there are no housing allocations within this area, and the strategic site East of Harlow lies 9.5 to 12 km away. The equivalent visitor surveys for Hatfield Forest however demonstrate that the catchment area extends to 16.6 km which includes the whole of the district and indeed all four proposed garden communities.
102. In order to avoid potentially adverse effects on these two sites as a result of recreational pressure from new residents, the Councils concerned are working with Natural England and the site owners to develop suitable mitigation strategies which will be adopted as supplementary planning guidance in due course. Harlow Council is committed to adopt and implement these mitigation strategies insofar as they affect the district, and if necessary new development will be expected to include or provide the avoidance and/or mitigation measures set out in these strategies which will be updated from time to time to take account of new scientific evidence or monitoring information. In the case of the strategic site east of Harlow, which lies outside the zone of influence of Epping Forest SAC but well within that of Hatfield Forest SSSI, strategic green infrastructure will be required within the development to maximise its self-sufficiency for informal recreation and this may meet the necessary requirements. It would not be reasonable to require the mitigation strategies to be in place prior to adoption of the HLDP as they are not within the direct control of the Council.
103. In the case of increased air pollution due to traffic generation, it is estimated that 99% of all additional movements through Epping Forest SAC will arise from growth in Epping Forest district rather than in nearby authorities including Harlow. Natural England agree that growth in Harlow will have a small or negligible effect and in this instance it would be reasonable for air quality mitigation measures to be the responsibility of Epping Forest district.
104. To ensure consistency with national policy and the effectiveness of the plan **MM10** is therefore necessary to add a new policy, Policy WE3A. This will ensure impacts on wildlife sites outside the district are properly considered with a project level HRA prepared if required. The policy requires adherence to relevant mitigation strategies as and when adopted and sets out the potential avoidance and mitigation measures that may be required.
105. In conclusion, subject to **MM7, MM8, MM9** and **MM10** the environmental policies in the plan and the areas to which they relate are justified, consistent with national policy and effective.

**Issue 7 – Whether the development management policies in the plan are justified, effective and consistent with national policy**

106. The HLDP includes 42 development management policies set out in 5 chapters to provide a framework for the determination of planning applications in the district.

107. In relation to placemaking, Policy PL1 requires a high standard of design for all development but in the interests of effectiveness should refer to the Essex Design Guide and to ensure consistency with paragraph 60 of the NPPF should not restrict style or stifle innovation. **MM13** makes the necessary changes to Policy PL1 to ensure that the plan is effective.
108. Policy PL3 requires high standards of sustainable design and efficient energy usage but the requirement to meet building regulation standards unnecessarily duplicates other legislation. **MM14** corrects this but also in the interests of effectiveness encourages development to standards recommended by the UK Green Building Council in order to respond to the need to reduce greenhouse gas emissions under the Climate Change Act 2008 and to comply with Section 19 (1A) of the 2004 Act.
109. The submitted plan contains no replacement for Policy NE3 in the 2006 Local Plan setting out how proposals in the Green Belt will be dealt with. To ensure the HLDP is consistent with national policy and will be effective **MM15** is necessary to insert a new development management policy for the designation based on the policies in the NPPF.
110. Policy PL4 sets out the policies that apply to protect Green Wedges and Green Fingers but to be effective this needs to ensure that proposals for the replacement, alteration or extension of existing buildings do not detract from the role or function of the designation or result in a disproportionate addition to the original building. **MM16** is necessary to make these changes.
111. Policy PL8 deals with biodiversity and geodiversity assets but as submitted is not fully consistent with paragraphs 109, 113, 117 and 118 of the NPPF. **MM17** is therefore necessary to seek a net gain in biodiversity, to recognise the hierarchy of designated sites, to conserve and enhance such assets and if necessary for proposals to include mitigation or compensatory measures.
112. Policies PL9 and PL10 relating to pollution, contamination, flooding and sustainable drainage require clarification and strengthening to be effective and to be consistent with national policy. **MM18** and **MM19** make the necessary changes. Similarly Policy PL11 dealing with heritage assets and their settings requires **MM20** for consistency with national policy in relation to the significance of assets, heritage statements, archaeological sites, heritage assets at risk and enabling development.
113. Turning to housing policies, an increasing number of properties in the district have been converted to Houses in Multiple Occupation (HMOs) and in response Policy H3 seeks to introduce a limit on the number of HMOs to one in a row of five units. HMOs provide valuable accommodation and increase housing choice but an undue concentration in any area may have a detrimental impact and reduce the availability of family housing. Given current evidence a one in five limit is justified as the right balance at the outset but to ensure the plan is effective **MM21** is necessary to require an early review of the policy.
114. The characteristics of Harlow with its aging population and the difficulties of adapting the new town housing stock for those with mobility difficulties justify the requirement in Policy H5 for all new dwellings to be built to Building Control Part M4(2) (accessible and adaptable homes) standard. However, the requirement for major developments to include homes to Part M4(3)

(wheelchair users) standard should be more flexible, refer to affordable housing only and both requirements made subject to practical or viability constraints to accord with national policy. To be justified and consistent with national policy **MM22** is necessary to make these changes to the policy and to update the text to recognise the need for extra care housing.

115. Policy H6 is justified to require a suitable housing mix but in the interests of effectiveness **MM23** is necessary to specify the full range of housing types and to apply the latest SHMA figures flexibly.
116. Policy H8 sets the requirement for 30% affordable housing in major housing developments but to accord with national policy **MM24** is necessary to apply this to sites of over 10 dwellings and to allow flexibility for viability reasons. To ensure effectiveness **MM24** also clarifies the presumption for provision on site with a suitable layout, to have regard to evidence of tenure mix and to be secured for first and subsequent occupiers.
117. The Policy H9 requirement for 5% of housing sites over 50 dwellings to be available as serviced self or custom build dwellings is not justified by the modest number of registrations for such plots and flexibility is required given the long-term nature of the strategic site east of Harlow. To ensure the plan is effective **MM25** is therefore necessary to remove the 5% figure in favour of a phase by phase negotiation to secure a continuous supply of plots based on the number of registrations over the plan period.
118. Amongst the prosperity policies, the two-year marketing period in Policy PR7 as submitted is inflexible and may lead to undesirable vacant units. **MM26** is necessary to allow developers and the Council to agree an appropriate marketing period for large town centre retail units prior to any sub-division to ensure the effectiveness of the plan.
119. In relation to lifestyle policies, to be justified the requirements in Policy L1 for recreation facilities in major development should be subject to demonstrable need and may include the upgrading of existing facilities. **MM27** makes the necessary changes. Public art is integral to the character of the new town so the requirement in Policy L3 for its provision within major developments is justified but **MM28** is necessary to make exception where impractical or for viability reasons and to encourage discussion as to its form in each case.
120. The evidence base for the plan including local health profiles demonstrates that Harlow faces a number of significant health and wellbeing issues including an aging population, health deprivation and health inequalities. Paragraphs 69, 70 and 171 of the NPPF require such matters to be addressed in local plans and the addition of a new policy covering these issues, Policy L4, is thus necessary for consistency with national policy and justified given the local circumstances. **MM29** sets out the new policy to deliver growth which has a positive impact in terms of encouraging physical exercise, health care and community facilities, healthy eating and good quality design.
121. Finally, the HLDP includes several infrastructure policies. The strategy of the plan is predicated on promoting sustainable transport options and Policy IN1 provides a suitable policy framework. However, for effectiveness **MM30** is necessary to set out the modal hierarchy and strengthen the policy to reduce the use of the car and provide public transport services. Policy IN2 deals with

the impact of development on the highway network but **MM31** is necessary to ensure the severe residual impact test is applied in line with national policy in paragraph 32 of the NPPF. Policy IN4 promotes broadband infrastructure to help reduce the need to travel and in the interests of effectiveness **MM32** seeks to ensure major developers provide high quality broadband links.

122. Policy IN6 is an important overarching policy to ensure the provision of related infrastructure as part of new development and is consistent with paragraphs 203-206 of the NPPF. However, to ensure its effectiveness **MM33** is required to clarify when financial contributions are acceptable and how viability issues will be taken into account in decision making.

123. In conclusion, subject to **MMs 13 to 33**, the development management policies in the plan are justified, effective and consistent with national policy.

## Overall Conclusion and Recommendation

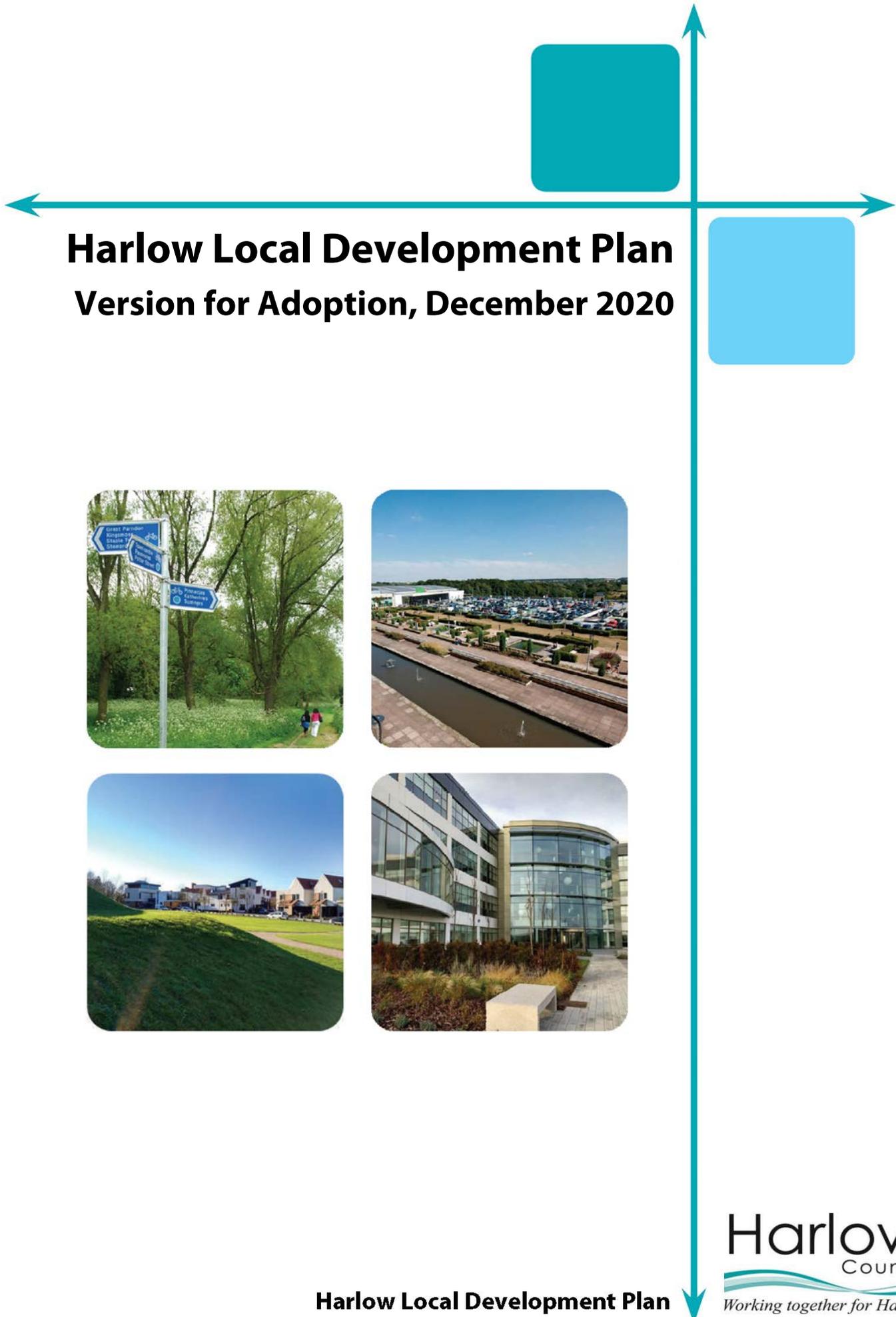
124. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

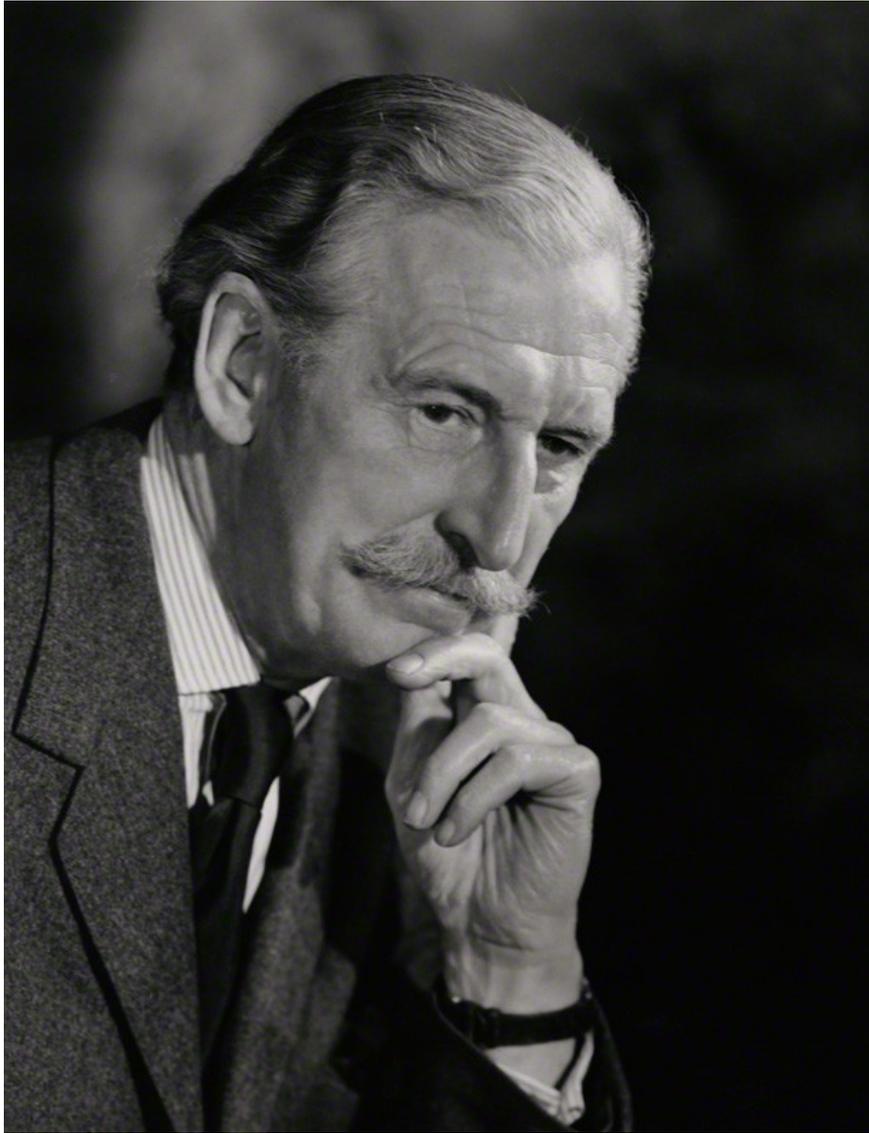
125. However, the Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Harlow Local Development Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*David Reed*

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.





**SIR FREDERICK ERNEST GIBBERD  
MASTERPLANNER OF HARLOW NEW TOWN  
1908 – 1984**

**Gibberd described Harlow as:  
“An organism which would go on changing and being rebuilt  
as the needs of the people altered.”**

Photograph of Frederick Gibberd by Walter Bird, 3 July 1967. © National Portrait Gallery.  
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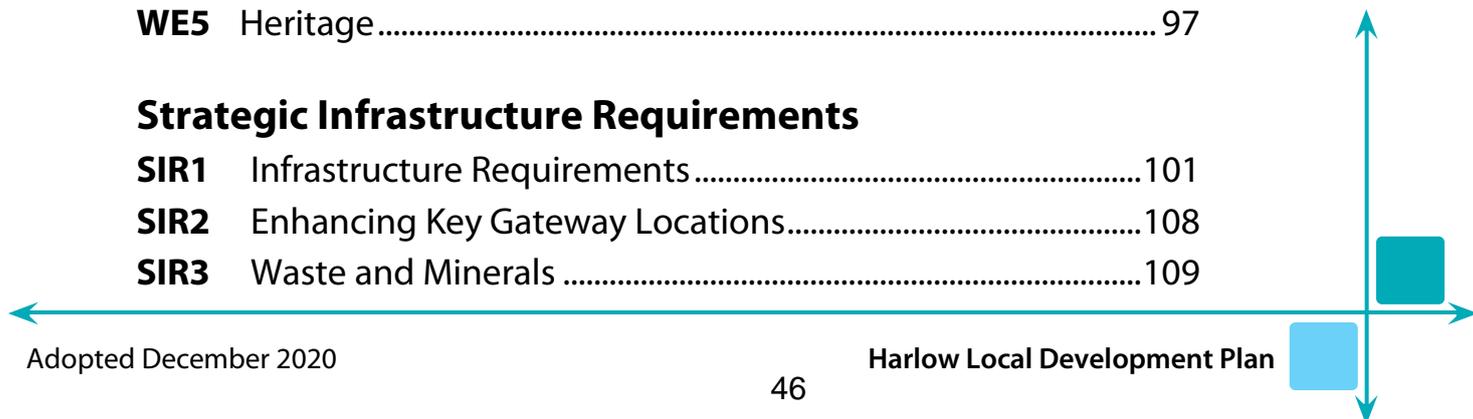
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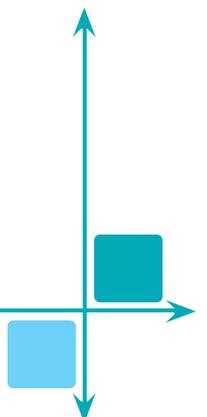
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# Foreword

To be inserted.

## Background

**This document is the Harlow Local Development Plan (the “Local Plan”), accompanied by the Policies Map, the Evidence Base and other supporting documents.**

The Local Plan sets out a long-term vision for Harlow, identifying land where development will be acceptable and where it will be unacceptable.

It contains policies which ensure future development is sustainable by meeting the needs of residents, businesses and visitors, while providing the required infrastructure and protecting environmental assets. These policies are material considerations in the determination of planning applications.

**It is important to read the Local Plan and Policies Map as a whole to understand the context and all the issues.**

The policies in the Local Plan were informed by a range of technical evidence, the evaluation of a range of issues and the consideration of options, and developed following a number of phases of public consultation.

The table below details the chapters where the *main* information on such issues can be found:

ISSUE	MAIN RELEVANT CHAPTERS	
	Strategic Growth Strategy	Development Management
<b>INFRASTRUCTURE REQUIREMENTS</b>	<b>11.</b> Strategic Infrastructure Requirements	<b>17.</b> Infrastructure
<b>PROTECTION OF GREEN SPACES</b>	<b>10.</b> Linking Development Sites to the Wider Environment	<b>13.</b> Placeshaping
<b>TOWN CENTRE REDEVELOPMENT</b>	<b>9.</b> Retail Ambitions and Town Centre Redevelopment	<b>15.</b> Prosperity
<b>NEW HOUSING</b>	<b>7.</b> Housing Strategy and Growth Locations	<b>14.</b> Housing

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The Policies Map, which accompanies the Local Plan, maps the planning policies and proposals across Harlow. The policies in the Local Plan are justified by an Evidence Base, which includes studies such as the Strategic Housing Market Assessment (SHMA) and the Green Belt Review.

The Local Plan is also supported by other documents such as the Sustainability Appraisal and Infrastructure Delivery Plan.

The Local Plan, Policies Map and all supporting documents on the Council’s website at [www.harlow.gov.uk/local-plan](http://www.harlow.gov.uk/local-plan). You can contact Harlow Council regarding the Local Plan by phoning (01279) 446 655 or by emailing [myharlow@harlow.gov.uk](mailto:myharlow@harlow.gov.uk)

The Local Plan was prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and in accordance with the Council’s Statement of Community Involvement (SCI).



**CONTEXT, VISION AND OBJECTIVES**  
**1. Introduction**



# CONTEXT, VISION AND OBJECTIVES

## 1. INTRODUCTION

- 1.1 The Harlow Local Development Plan (usually known as the “Local Plan” for brevity) sets out the long-term planning vision for the district and guides future development across Harlow during the Local Plan period<sup>1</sup>, and ensures that development in the district is sustainable and meets the needs of residents, businesses and visitors to the area. The Local Plan supersedes the Adopted Replacement Harlow Local Plan (2006) to become the basis upon which planning applications are determined. The policies and proposals in the Essex Minerals Local Plan and the Essex and Southend-on-Sea Waste Local Plan are the basis upon which Minerals and Waste proposals are determined by Essex County Council, unless there are material considerations which indicate otherwise.
- 1.2 The Local Plan takes into consideration the economic, social and environmental conditions of the district. The preparation of the policies contained within it were informed by the Evidence Base which details the future housing, retail and employment needs of Harlow, together with identification of the necessary supporting infrastructure. All this is balanced against the need to protect key environmental assets.
- 1.3 The strategic implications of the evidence were prepared and considered in collaboration with East Hertfordshire, Epping Forest and Uttlesford District Councils, and Essex and Hertfordshire County Councils, in accordance with the obligations of the Duty to Co-operate as set out in the Localism Act 2011. More information on the Duty to Co-operate can be found later in this chapter.
- 1.4 The Local Plan is underpinned by a number of key Strategic Objectives. These are supported by the Strategic Growth policies, which provide an overarching planning framework and set out the district’s development needs, together with Development Management policies. The Policies Map accompanies the Local Plan and illustrates the policy themes, areas where existing land uses will be protected and areas where growth and regeneration have been identified. The Local Plan must be read as a whole and alongside national policies.
- 1.5 The Local Plan has been prepared in accordance with national legislation and guidance, including the Town and Country Planning (Local Planning) Regulations 2012 (as amended), the National Planning Policy Framework (NPPF) (2012)<sup>2</sup> and

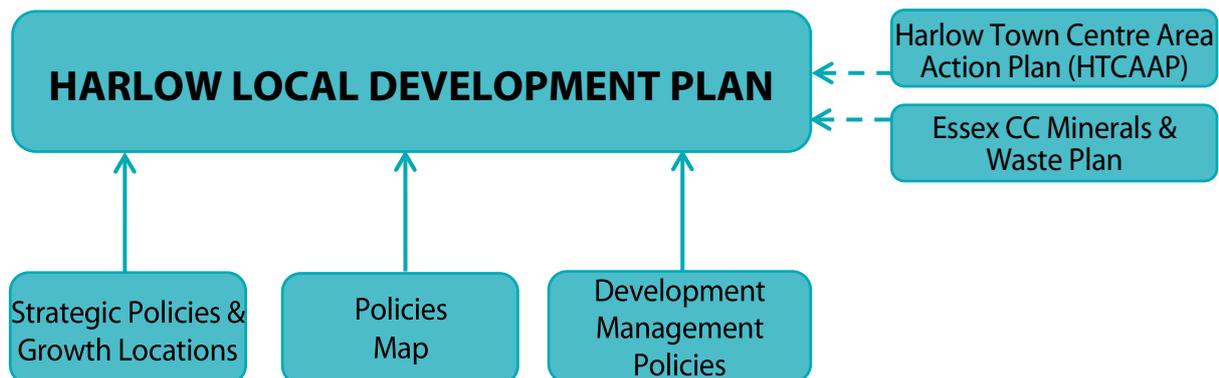
<sup>1</sup> The Local Plan period is 1 April 2011 to 31 March 2033.

<sup>2</sup> Paragraph 214 of the NPPF (2019) states “The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019”. The policies of the 2012 NPPF, therefore, applied to the examination of the Harlow Local Plan, which was submitted in October 2018.

Planning Practice Guidance as it was in July 2018 when the new NPPF was published.

- 1.6 An Infrastructure Delivery Plan (IDP) has also been prepared to identify the infrastructure required to support the future levels of growth across the district. A separate Area Action Plan is being prepared to provide a detailed planning framework to deliver growth and regeneration in and around Harlow Town Centre.
- 1.7 The components of the Local Plan are illustrated in Fig. 1.1.

Fig. 1.1: Components of the Harlow Local Development Plan



- 1.8 The Local Plan will be kept under review in response to changes in local needs and conditions and national policies. Its effectiveness will be monitored over time against a set of indicators.
- 1.9 In 2019/20, the Local Plan was examined by an independent Inspector to assess whether it was prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.
- 1.10 In the production of the Local Plan, consideration was given to responses received during a number of consultations, which are summarised below.

## The Preparation of the Harlow Local Development Plan

### *Issues and Options Consultation (2010)*

- 1.11 The Adopted Replacement Harlow Local Plan (July 2006), which was based upon the concepts set out in Sir Frederick Gibberd's original master plan for Harlow New Town, replaced the previous Local Plan adopted in 1995.
- 1.12 In 2010, the Council began the preparation of a new Local Plan and consulted on an Issues and Options document. This proposed a number of objectives for the district, based around five key themes: Placeshaping, Housing, Prosperity, Infrastructure and Lifestyles.
- 1.13 As well as seeking views on these key themes, the Council consulted on a series of potential growth options around Harlow, based on housing numbers identified in the now-revoked East of England Regional Spatial Strategy (RSS). These options, which were based on the potential need for 11,000 new dwellings in locations around Harlow, are set out in Fig. 1.2.

Fig. 1.2: Growth Options in the Issues and Options consultation (2010)

<b>Option A RSS: Northern Led</b>	Based on requirements set out in the RSS (undergoing the process of revocation at the time) which placed the bulk of the housing to the north of Harlow, with some more growth to the east but very little development to the west and south
<b>Option B Policy-led</b>	Disbursed growth, evenly distributed around the edges of Harlow, thereby taking into consideration all alternatives
<b>Option C Combined criteria-led</b>	Majority of growth located to the east and south, with no development to the north and very little development to the west, reflecting a range of environmental criteria
<b>Option D Regeneration-led</b>	Maximising regeneration potential, this option allocated growth to the north, east and south, with very little development to the west
<b>Option E Sustainable transport-led</b>	Growth would be concentrated along major transport routes or where transport would be enhanced, this mostly being to the east but with major growth also located to the north and west

- 1.14 The responses to the Issues and Options consultation showed there was little support for the growth levels identified in the RSS but strong support for growth to meet local housing needs. The majority of respondents considered that growth should be located in areas that would maximise the ability to regenerate Harlow and, in particular, that protection should be afforded to the district's Green Wedges. Transport and infrastructure issues were also highlighted as matters that required resolution before large-scale development took place.
- 1.15 Other issues raised included the validity of the growth figures considered in the RSS given that, at the time of the consultation, the RSS was undergoing the process of revocation; the desire for growth to be determined by local needs; and the fact that Harlow itself would be unable to allocate land for growth outside of its administrative boundaries.

### ***Emerging Strategy and Further Options Consultation (2014)***

- 1.16 The Council subsequently consulted on the Emerging Strategy and Further Options document in 2014. This document reflected the changes made to the plan-making system through the enactment of the Localism Act 2011, the publication of the NPPF and the revocation of the East of England RSS. This meant the future development needs of the district, based on an assessment of local social, economic and environmental conditions, would be determined through the preparation of a new Local Plan.
- 1.17 As a result of emerging evidence and the need to identify a suitable housing number for Harlow's local needs, the consultation contained a number of potential housing options. These options were based on work undertaken by consultants who concluded that to make Harlow a sustainable place to live, work and visit, it would require a high level of growth to boost regeneration and to attract

investment. The consultation document presented five development scenarios and housing target figures as set out in Fig. 1.3.

Fig. 1.3: Growth Scenarios in the Emerging Strategy and Further Options Consultation (2014)

<b>Scenario A – Do Nothing More: 3,929 dwellings and loss of 1,207 jobs</b>	This option assumed that no more housing is built in Harlow other than those locations which already benefit from planning permission
<b>Scenario B – Meeting Development Needs: 7,485 dwellings and 3,057 jobs</b>	This option reflected demographic modelling undertaken at the time
<b>Scenario C – Jobs Led: 11,490 dwellings and 8,060 jobs</b>	This option looked to provide enough jobs in Harlow to meet the district's economic aspirations and a level of housing set to ensure sufficient people of working age
<b>Scenario D – Growing Centre: 15,000 dwellings and 12,099 jobs</b>	This option assessed the approximate level of development set out in the RSS
<b>Scenario E – Transformed Centre: 20,000 dwellings and 18,121 jobs</b>	This option was based upon sufficient growth to support a 'transformed' Harlow Town Centre (particularly in retail and leisure)

- 1.18 Respondents to the consultation identified the need for Harlow to provide for high levels of growth in order to tackle existing issues around affordability, infrastructure provision, regeneration needs and investment opportunities. Respondents also recognised the need for the Council to work closely with its neighbouring authorities through the Duty to Co-operate to facilitate such growth.

#### ***Development Management Policies Consultation (2017)***

- 1.19 In 2017, the Council invited comments on the emerging Development Management policies. The policies will guide future development across the district and provide a regeneration strategy up to 2033. These provide a detailed planning framework which will be used to assess planning applications and underpin a number of overarching Strategic policies that will be contained in the Local Plan. A number of responses were received and, where appropriate, the policies were modified.

#### ***Pre-Submission Publication (2018)***

- 1.20 In 2018, the Council published the Pre-Submission Publication version of the emerging Harlow Local Development Plan, which was the final version before it was submitted for Examination.
- 1.21 The Council invited comments on whether the Local Plan meets the following four tests of soundness, as set out by the National Planning Policy Framework (2012):
- Positively prepared – the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities

where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the Local Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the Local Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the Local Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

- 1.22 The responses received informed a number of minor changes which were proposed by the Council and submitted – along with the Local Plan, Policies Map, Evidence Base and other accompanying documents – to the Secretary of State in October 2018. The Examination subsequently took place in 2019-20.
- 1.23 Following the Examination, the Inspector wrote to the Council to advise that subject to a number of modifications, the Local Plan had been found sound. After consideration and implementation of the Inspector's findings, the Council adopted the Local Plan at the Full Council meeting on 10 December 2020.

## The Policies Map

- 1.24 The Local Plan has been developed around a number of themes and these are reflected, where appropriate, in the allocations and designations shown on the Policies Map.

### *Placeshaping*

- 1.25 The Policies Map shows the extent of the Green Belt in Harlow together with the network of Green Wedges and Green Fingers, as well as protected biodiversity assets in the district.
- 1.26 The Policies Map also indicates the boundaries and locations of some of Harlow's heritage assets and historic environment, including Conservation Areas, Scheduled Monuments and a Registered Park and Garden.
- 1.27 The Environment Agency regularly updates flood zone areas and areas susceptible to surface and ground water flooding in the district. The Council's website provides links to more up-to-date information provided by the Environment Agency on flood warnings, river levels and flood risk maps.

### *Housing*

- 1.28 Housing sites, including the Strategic Housing Site East of Harlow (part of a new Garden Community), are allocated on the Policies Map. The boundaries indicate the extent of the allocation areas, but they do not necessarily reflect the extent of the land that will be developed; this will be subject to a detailed assessment as part of a planning application or masterplanning exercise. The northern part of the Strategic Housing Site East of Harlow extends into the adjacent district of Epping Forest; the

extent of the part in Epping Forest will therefore be allocated in the Epping Forest Local Plan.

### ***Prosperity, Lifestyles and Infrastructure***

- 1.29 The Policies Map outlines the hierarchy of retail centres across the district including Neighbourhood Centres and Hatches. A separate Harlow Town Centre Area Action Plan is being prepared which will be accompanied by a Policies Map showing major regeneration areas in the town centre, as well as primary and secondary frontages.
- 1.30 Other Open Spaces, cultural and recreation facilities, and other community buildings and facilities are not shown on the Policies Map because they can vary in size and scale. They are, however, protected through the policies in the Local Plan.
- 1.31 Where appropriate, the locations of the key infrastructure needed to support development are identified on the Policies Map.

### **Evidence Base**

- 1.32 The Local Plan has been informed by a number of key pieces of evidence which are available for inspection on the Council's website at [www.harlow.gov.uk/evidence](http://www.harlow.gov.uk/evidence)

### **Sustainability Appraisal and other supporting documents**

- 1.33 The Local Plan has been subject to a Sustainability Appraisal (SA) which has assessed the potential economic, environmental and social effects of the Local Plan. In addition a Habitats Regulation Assessment and Equalities Impact Assessment have been undertaken.

### **Duty to Co-operate**

- 1.34 The Localism Act 2011 places a duty on Councils to co-operate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.
- 1.35 The Council has worked closely with neighbouring authorities, statutory bodies and other interested parties in preparing the Local Plan. In order to deliver the wider growth strategy for Harlow, a number of key pieces of evidence have been jointly prepared with other local Councils. This includes a Strategic Housing Market Assessment (SHMA) which sets out the housing need for the Housing Market Area (HMA) and a Site Selection Report which appraised all the development sites around Harlow.
- 1.36 The Council has also worked closely with other authorities to assess the cumulative impact of growth on the strategic highway network, leading to the identification of a number of mitigation measures. A joint Memorandum of Understanding (MoU) with Highways England, Essex and Hertfordshire County Councils and East Hertfordshire, Epping Forest and Uttlesford District Councils has been prepared

endorsing improvements to the highway network, including the new M11 Junction 7a.

- 1.37 Additionally, a MoU has been prepared, focussing on the management of growth from development on the Epping Forest Special Area of Conservation to ensure no adverse effects on the integrity of the SAC.
- 1.38 The MoU is required because development within Harlow may, in combination with development in other areas, affect the integrity of European Sites which lie outside the district. This MoU will ensure the co-operation needed to implement Policy WE4.
- 1.39 A MoU has also been prepared with East Hertfordshire, Epping Forest and Uttlesford District Councils which sets out the distribution of the Objectively Assessed Housing Need across the area. The MoUs are available to view on the Council's website.
- 1.40 The Council has held a series of meetings and discussions with infrastructure providers to ensure the right level of infrastructure and investment are in place to deliver the growth in and around Harlow. This includes transport infrastructure (both public and private), education, healthcare provision, utilities, social care provision, waste and crematorium space. The information gathered from these discussions has led to the creation of the Infrastructure Delivery Plan (IDP).

## Harlow and Gilston Garden Town

- 1.41 Harlow, Epping Forest and East Hertfordshire District Councils and strategic partners have come together to facilitate growth through the development of new Garden Communities, which are to be delivered as part of the Harlow and Gilston Garden Town. This will enable the development and identification of clear design principles tailored to the unique characteristics of Harlow and the Gilston area.
- 1.42 This is based upon a common set of values, objectives and a commitment to secure the delivery of growth across the area, reflecting close cross-boundary working between Harlow, Epping Forest, East Hertfordshire District Councils and strategic partners. Harlow and Gilston Garden Town lies in the core area of the London Stansted Cambridge Corridor.

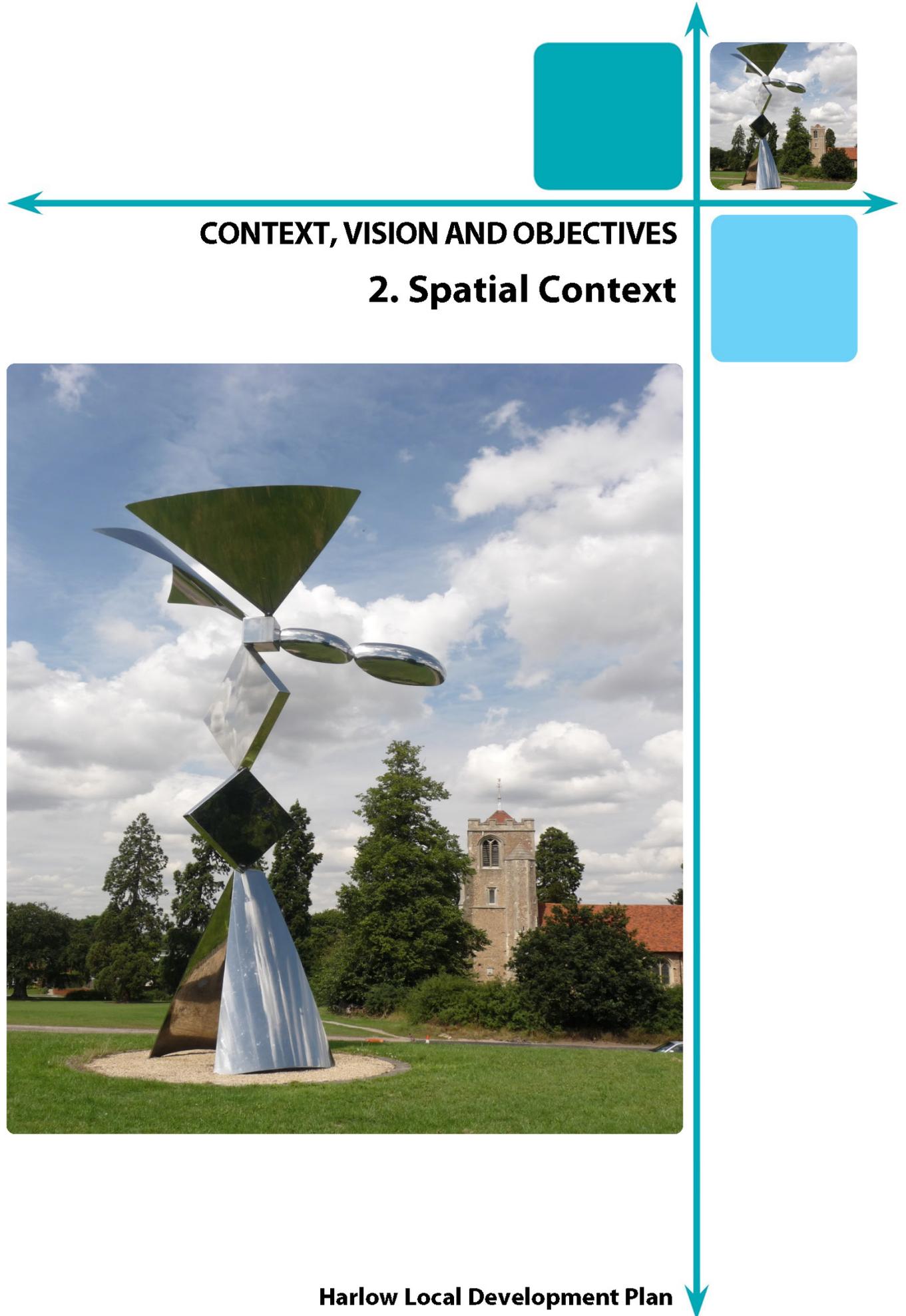
## Applying the policies in the assessment of planning applications

- 1.43 Upon receipt of a valid planning application, the proposed development will be determined using the relevant Local Plan policies. The Essex Minerals Local Plan and the Essex and Southend-on-Sea Waste Local Plan, adopted by Essex County Council and Southend-on-Sea Borough Council, are the relevant Local Development Plans in respect of minerals and waste matters in Harlow. The Harlow Local Plan does not duplicate the Minerals Local Plan or Waste Local Plan. Furthermore, the policies in the Harlow Local Plan do not repeat national guidance or policies; therefore, where a policy in the Local Plan is absent or silent, it is because adequate national planning policies exist.

- 1.44 Supplementary Planning Documents (SPDs), such as the Council's Design Guide, support and provide more detail to certain policies which may be a material consideration in the assessment of planning applications.
- 1.45 Each planning application will be assessed on its own merits, taking account of all relevant planning policies and material considerations. While an application may be supported by any single policy, this does not mean that permission will be granted. An application must satisfy relevant Local Plan policies, both Strategic and Development Management. Matters of interpretation on whether a policy is relevant and whether an application satisfies relevant policies are for the Council to determine.
- 1.46 When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as set out in national policies and guidance. The Council will work proactively with applicants to find solutions to secure development that improves the economic, social and environmental conditions in the district. The Council may grant permission with planning conditions attached which ensure that the development accords with the Local Plan policies.
- 1.47 Planning applications which accord with the policies in the Local Plan will be approved, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, the Council will grant permission unless national policies or material considerations indicate otherwise, taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.
- 1.48 There may be some instances where a proposal may not satisfy all policy criteria, but may be deemed acceptable when considered against all material considerations. Alternatively, there may be occasions where an application satisfies all policy criteria, but due to overriding material considerations, may still be considered unacceptable.
- 1.49 The Council will monitor and review the Local Plan policies in order to assess their performance in relation to delivering the Council's Core Priorities. The policies will be reviewed in the Council's Authority Monitoring Reports (AMRs).

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**CONTEXT, VISION AND OBJECTIVES**  
**2. Spatial Context**



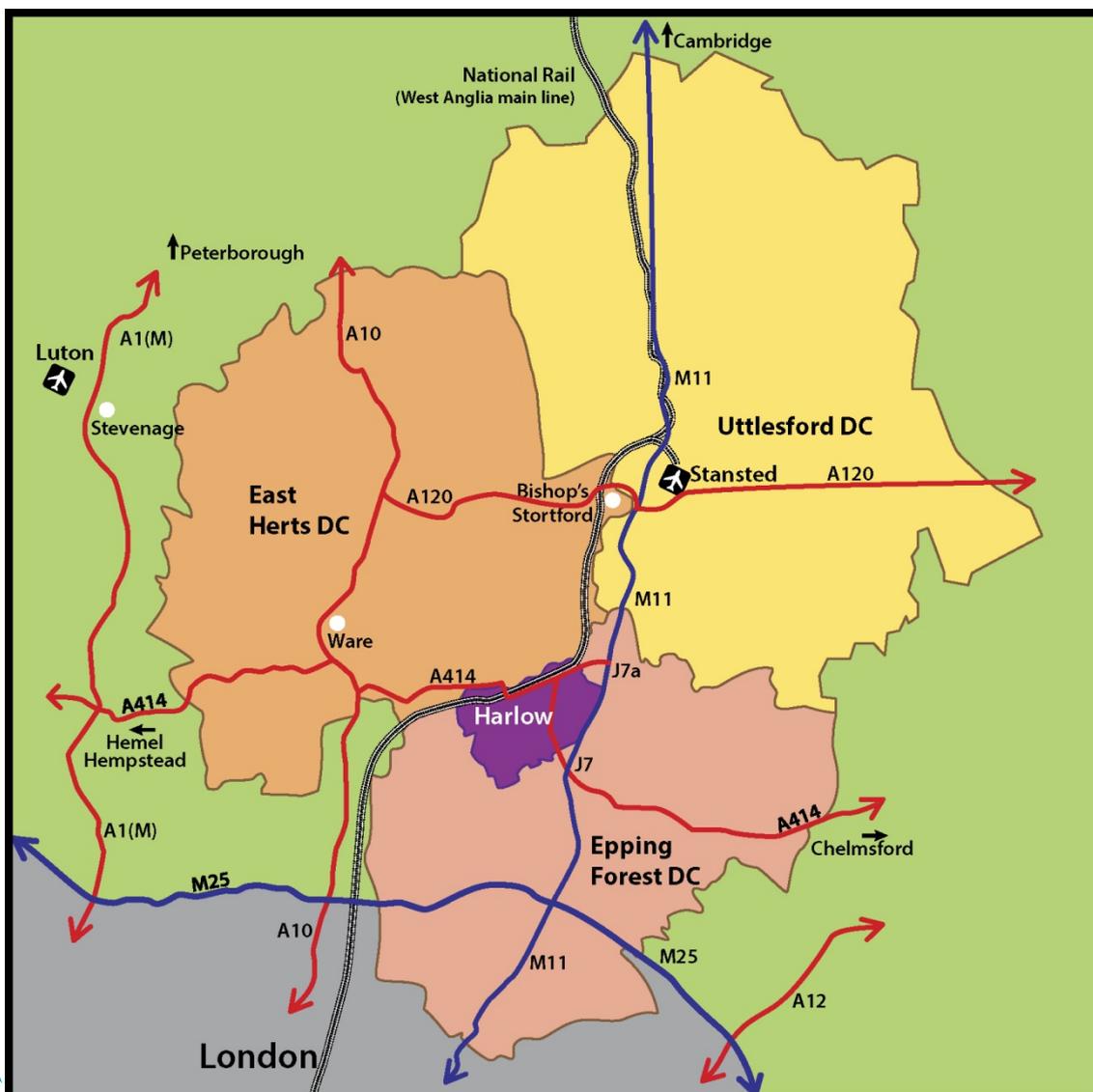
**Harlow Local Development Plan**

## 2. SPATIAL CONTEXT

### Where is Harlow?

- 2.1 Harlow is located in the west of the County of Essex and is bordered by Epping Forest district to the south, west and east; and East Hertfordshire district (in the County of Hertfordshire) to the north (see Fig. 2.1).
- 2.2 Harlow is 38km north of London and 50km south of Cambridge. It has good access to the M11, and the West Anglia Mainline railway and Stansted Airport is located 24km to the north-east. Harlow is the smallest local authority area in Essex, with a land area of 30.5sqkm.

Fig. 2.1: Map of Harlow and its spatial setting



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## The Evolution of Harlow

- 2.3 Between 1946 and 1970, 21 New Towns were designated in the UK under the New Towns Act, primarily to rehouse communities displaced by bomb damage caused during the Second World War. The New Towns were influenced by Garden Cities, formulated by Sir Ebenezer Howard in the late 1800s to deliver settlements which combined the best of town and country and offered alternatives to the polluted, industrial towns of the Industrial Revolution.
- 2.4 In September 1946, the then Minister of Town and Country Planning, Lewis Silkin, invited Frederick Gibberd to work on a plan for a New Town in the Harlow area. The plan would also contribute to designating the site of the New Town. An inquiry into the designation was held in December 1946 and the Ministry enacted a Designation Order for Harlow New Town on 25 March 1947. The current tight administrative boundary of Harlow, and subsequent small size of the district, is a legacy of this designation. However, Harlow nowadays serves as an important sub-regional centre that meets employment, retailing, social and cultural needs of the surrounding area.
- 2.5 Sir Frederick Gibberd's draft master plan was given ministerial approval in 1949 and the Harlow Development Corporation was established to deliver Harlow New Town. The final version of the master plan was published in 1952 (see Fig. 2.2).
- 2.6 The master plan was influenced by the area's distinctive landscape and environmental features, such as the River Stort in the north, the valley ridges and wooded areas in the south and other important ecological assets. The New Town was built around a series of neighbourhoods, dissected by large areas of natural and semi-natural spaces, now known as Green Wedges, which are key physical features of Harlow that have shaped its subsequent growth.
- 2.7 The neighbourhoods, as set out in the master plan, were focussed around a shopping centre with easy access to social and educational facilities, connected by a series of distributor roads together with a network of cycleways and footpaths. These were separated by a network of landscape wedges, now known as Green Wedges, which were designed to reflect the original landscape setting.
- 2.8 The Green Wedges and Green Fingers continue to provide amenity space for residents, habitats for wildlife, transport corridors, locations for schools and sport and community facilities. Two industrial sites, Templefields and Pinnacles, were located in the north and west of the district, relatively close to the railway line. The Town Park was provided to the north-east of the town centre and was designed around existing landscape features and a hamlet.

Fig. 2.2: Harlow Master Plan (Harlow Development Corporation, 1952)



### Population Profile

2.9 Harlow’s population is approximately 85,400 residents<sup>3</sup>. The district first reached its original target population of around 80,000 people in the mid-1970s<sup>4</sup>, but this was subsequently followed by a period of population decline. In 1995, Harlow’s population fell to 73,600 people<sup>3</sup>, which gave rise to a number of social and economic problems.

2.10 The district’s population grew again in the late 1990s and 2000s through planned extensions to Harlow, in particular the Church Langley and Newhall neighbourhoods.

<sup>3</sup> Office for National Statistics, 2015 Mid-Year Estimates.

<sup>4</sup> Gibberd, F., et al., 1980. HARLOW: The Story of a New Town.

- 2.11 Harlow has a very high population density of 26.8 people per hectare, compared to 4.7 for Essex and 4.1 for England.<sup>5</sup> This high density is compensated by easy access to services and facilities and the network of Green Wedges and open spaces across the district.
- 2.12 The population of Harlow, in comparison to the rest of Essex, is relatively young with 21% of its residents aged between 0-15 years, and the percentage of older persons living in Harlow is lower than Essex and England averages<sup>3</sup>. The district has a higher than average number of lone parent households<sup>6</sup> and higher overcrowding levels compared to the rest of Essex and England<sup>7</sup>. Smoking and obesity levels in Harlow are higher than average, with physical activity rates lower than average<sup>8</sup>.
- 2.13 Deprivation levels in the district are overall lower than the England average but high compared to most parts of Essex.<sup>9</sup> There are some variances between different parts of Harlow, with the east being less deprived than areas to the west and south. Furthermore, the district's health profile is higher than the England averages in some respects, such as smoking rates, alcohol related hospital admissions and obesity. Physical activity is also low and therefore there are overall health and wellbeing issues across the town.

## Housing and Affordability

- 2.14 There are over 35,800 dwellings in the district and 34,700 households<sup>5</sup>. Harlow has a high proportion of homes rented from the Council, a legacy of the Development Corporation. There is also a higher than average proportion of terraced properties, which reflects the principles laid down in the original master plan for Harlow, where higher density urban areas were interspersed with areas of open space and linked green areas, including the Green Wedges.
- 2.15 Harlow's property prices are lower than other parts of Essex. However the house price growth in Harlow has outstripped wage increases making properties in Harlow unaffordable for many of the district's residents.
- 2.16 The highest level of affordable housing need in the Housing Market Area (HMA) is in East Hertfordshire (3,685 households) compared to 2,851 in Epping Forest, 3,098 in Harlow and 2,167 in Uttlesford<sup>10</sup>. However, the percentage requirement in these districts compared with overall need is in stark contrast to Harlow, with 61% in Harlow compared with 35% in Epping Forest, 32% in East Hertfordshire and 26% in

<sup>5</sup> Office for National Statistics, *2011 Census*.

<sup>6</sup> Office for National Statistics, *2015 Households and Families*.

<sup>7</sup> Office for National Statistics, *2011 Census Analysis*.

<sup>8</sup> Public Health England, *2015 Health Profile for Harlow*.

<sup>9</sup> Ministry for Housing, Communities and Local Government, *2015 English Indices of Deprivation*.

<sup>10</sup> ORS, *West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update, July 2017*.

Uttlesford<sup>10</sup>. The need in Harlow equates to around 3,400 new affordable dwellings over the Local Plan period.

- 2.17 The Council has been working with selected partners to bring forward Regeneration projects. These projects are in the process of redeveloping some of the more outdated estates where it has become uneconomic to refurbish the original buildings, particularly where homes have been found to be structurally unsound. They also provide an opportunity to produce a net increase in the number of homes within the project area.
- 2.18 A limited number of new Council houses have been provided and a number of sites in Council ownership have been allocated where innovative housing schemes will be developed to further increase the supply of affordable homes.

## Employment

- 2.19 Harlow has a slightly higher percentage of working age people (i.e. people aged 16-64 but not necessarily in work) than the East of England. The majority of Harlow's jobs are engaged in health care and social work, mainly due to the presence of Princess Alexandra Hospital, wholesale and retail and administration and support service activities. The majority of Harlow residents are employed in elementary and sales and customer service occupations.
- 2.20 Residents of Harlow earn less than the county average and less than the average income of employees who work in Harlow<sup>11</sup>. Given the high level of self-containment in Harlow, this would suggest that higher paid jobs are being filled by those living outside of Harlow, meaning the local economy misses out on their disposable income. The district's residents also have a higher claimant count and lower qualification attainment compared to the rest of Essex and the rest of the country<sup>11</sup>.
- 2.21 The district's two main employment areas are located at Templefields in the north and the Pinnacles in the west. Templefields contains around 80,000sqm of commercial floorspace, mostly industrial and logistic, with relatively low levels of vacancy. The Council has designated 28ha of the Templefields employment area as part of Harlow's Enterprise Zone in order to secure regeneration of the area.
- 2.22 The Pinnacles employment area consists of more high quality modern industrial units and mostly contains production, distribution and office uses. Vacancy rates are relatively low and the largest vacant building, the former GSK site, is to be occupied by Public Health England which is relocating to Harlow. It is considered that the new M11 Junction 7a will improve the flow of traffic east to west across the district and provide a catalyst for further growth.
- 2.23 The Council has also identified London Road, in the east of the district, as a further employment area of the Enterprise Zone. The purpose of this land is to promote

<sup>11</sup> Office for National Statistics, 2015. *NOMIS Official Labour Market Statistics*.

medical technology and other high tech companies. It has also been identified as an opportunity site by the London Stansted Cambridge Consortium (LSCC).

- 2.24 As well as the two large employment areas and the Enterprise Zone sites, the district also has a number of smaller employment areas including Burnt Mill which mostly consists of warehousing and workshops; Staple Tye and Bush Fair Neighbourhood Centres which provide factory/office/workshop premises; and the Latton Bush Centre which provides a range of office floorspace.

### Retail Centres

- 2.25 Harlow Town Centre is a major employment and shopping destination with a mix of office, retail and leisure provision. It also provides an important supply of housing. In 2004, major regeneration took place through the development of the Water Gardens in the south which included the new Civic Centre, retail space including the Asda foodstore, and a 1,200 space car park. The Harvey Centre, an indoor shopping centre, also provides a number of retail units and has seen redevelopment through the provision of a new cinema and restaurants.
- 2.26 Broad Walk, a linear street running north-south along the eastern edge of the town centre, contains a number of retail units, although they are more constrained by size and configuration. The market is held at the northern end of Broad Walk. The northern end of the town centre around Market Square has a higher proportion of vacant units.
- 2.27 The district contains five Neighbourhood Centres and several smaller Hatches. They provide important local retail and other facilities for residents and can help reduce car travel and increase sustainability. The five Neighbourhood Centres include Bush Fair and The Stow, both original 1950s centres which have seen little redevelopment or change; Old Harlow, which comprises the historic streets of the old market town; Church Langley, a modern hub serving the newer urban extension; and Staple Tye which saw major redevelopment in the 1980s to provide larger, more modern retail units.

### Transport and Accessibility

- 2.28 Harlow benefits from being within close proximity of major transport corridors which afford good connectivity within the UK and beyond. This includes the M11 in the east which stretches from London to Cambridge and beyond towards Peterborough, and provides access to Stansted Airport which lies just north of Harlow; the A10 which lies further to the west which runs north-south from central London to Cambridge; the M25 ring-road Motorway around London; and the A414 which provides east-west routes from Chelmsford through to St Albans.
- 2.29 The district has two railway stations; Harlow Town and Harlow Mill located in the north and north-east of Harlow. They are located on the West Anglia Mainline which links London Liverpool Street to Cambridge. This line also provides an express train from Liverpool Street to Stansted Airport, stopping at Tottenham Hale, Cheshunt, Harlow Town, Bishop's Stortford and Stansted Mountfitchet.

- 2.30 The internal road structure of Harlow reflects the original master plan of the district and is based on a network of primary distributor roads, mostly running through Green Wedges that link the main parts of Harlow with one another, and secondary distributor roads which link centres with each other and with the industrial estates. The primary distributor roads were originally intended to be dual carriageways and the secondary distributor roads were only intended to be single carriageway. Both have become congested over time.
- 2.31 Cycleways and bridleways are aligned with the footpath system, including those running through Green Wedges and Green Fingers, and are extensive across the district. A number of locations in the highway network have dedicated bus lanes.
- 2.32 Harlow has only two major connections to the national road network: Junction 7 on the M11, which is the only link to the national motorway network; and the A414 at Burnt Mill which can become severely congested at peak periods. Junction 7 of the M11, the closest junction to Harlow, is at capacity; future planned growth including that already being proposed at the London Road Enterprise Zone is dependent upon changes to the strategic road network. The internal road structure has been subject to major modification to help relieve congestion including the provision of roundabouts to replace signalised junctions, on-off slip roads from those roundabouts and the conversion of single carriageways to dual carriageways. The new Junction 7a on the M11 to the north-east of the district will facilitate current and future development coming forward.
- 2.33 The Council has also supported the extension of Crossrail 2 to Harlow, to reinforce the key locational advantages of the district and to serve the growth identified across the wider Harlow area. The West Anglia Mainline is single tracked in both directions, but four-tracking has been under consideration for some time and would improve journey reliability and capacity. There is also a need to increase the frequency of the bus services to the industrial estates; to provide more opportunities to travel sustainably within and in and out of Harlow; to increase the provision of Sunday services; and to improve journey times for buses.
- 2.34 Improvements will be made to the local highway network and to the public transport network, including the enhancement of established transport corridors and the provision of new sustainable transport corridors through Harlow. This will help manage overall travel demand, improve connections within Harlow and to areas outside the district, and integrate new communities to Harlow, the Enterprise Zones and other employment areas through a choice of transport modes. There are also aspirations for a modal shift in travel, meaning 60% of travel in the new Garden Town Communities and 50% in the existing area of Harlow would be by sustainable modes of transport. Sustainable transport matters (including walking, cycling and public transport) and reducing the need to travel are, therefore, important for the successful future growth of Harlow.

### Green Infrastructure and the Natural Environment

- 2.35 Green Infrastructure is multi-functional natural and man-made urban and rural green space, including parks, playing fields, woodlands, allotments, wildlife corridors, rivers, canals and other bodies of water. Almost half of the land in Harlow

is a form of open space, much of which is multi-functional, with 24% being designated as Green Wedges or Green Fingers, and 15% as Green Belt. These Green Wedges and Green Fingers are fundamental parts of the Green Infrastructure, as they contain multi-functional open spaces which are linked to other open spaces and the countryside.

- 2.36 The Green Belt, technically known as the Metropolitan Green Belt, was designated over sixty years ago to prevent the unrestricted sprawl of London and was expanded between the 1950s and 1980s. The land designated as Green Belt in Harlow forms part of this wider Green Belt.
- 2.37 Harlow contains a number of locally designated and nationally designated natural environment assets, including Sites of Special Scientific Interest and Local Wildlife Sites. In the north there is a series of floodplains and other wetland sites along the River Stort and Stort valley; centrally, from the Pinnacles area through to Newhall is a series of ancient woodlands and grasslands representing old countryside habitats; and in the south are the woodlands and commons of Parndon and Latton Bush areas.

### Historic Environment

- 2.38 As well as having important Green Infrastructure links and areas of important biodiversity and landscaping, Harlow also has a rich historical heritage even though most of the district was built post-war. Harlow has 10 Conservation Areas which protect some of the older areas of the district. These areas include Old Harlow, which was established before the New Town was built; and the Mark Hall neighbourhood, which reflects the early architectural style and planning of the New Town. The district also currently contains 168 listed buildings, 26 locally listed buildings, a Registered Park and Garden and several Scheduled Monuments.

### Issues and Challenges

- 2.39 Since its inception, Harlow has been subject to distinct phases of growth and change. The district still faces significant challenges, including a shortage of affordable housing and a range of good quality housing stock; a highway network which is severely congested at peak times; an ageing physical environment; localised deprivation; and a skills shortage. Harlow performs poorly against comparator towns on a range of measures including employment growth, Gross Value Added (GVA) per worker, knowledge based businesses, skills base and retail ranking. This, along with the district's tight administrative boundaries, means that Harlow's ability to meet its long-term needs are inhibited which can hinder the district's regeneration and long-term economic prospects.
- 2.40 The Local Plan Evidence Base demonstrates that Harlow needs housing growth in order to improve and resolve the following issues to:
- (a) provide affordable and flexible housing for future population needs;
  - (b) provide the critical mass needed to regenerate retail centres and other facilities;

- (c) provide attractive new homes for the workforce needed to retain and expand Harlow businesses; and
- (d) deliver major infrastructure, including the new M11 Junction 7a.

**2.41 To provide affordable and flexible housing for future population needs**

The Evidence Base shows that people are living longer and more live alone resulting in smaller households, increasing the need for homes irrespective of population growth. There will still be a requirement for Harlow to provide housing for future population needs and to resolve affordability and homelessness issues currently experienced in the district. Housing growth will also help to deliver a range of new quality homes in order to retain residents who may seek housing needs elsewhere and to attract new residents who will invest and work in the area.

**2.42 To provide the critical mass needed to regenerate and reinforce retail centres**

Additional housing means an increase in population resulting in increased spending in the district's retail centres, particularly the town centre which provides sub-regional services and facilities. This spend will attract investors to locate in Harlow and, therefore, develop and regenerate the centres and reduce vacancy rates. Growth around the Neighbourhood Centres through estate regeneration will be delivered through the Local Plan. Growth in the Town Centre through the provision of new housing will be delivered through the separate Harlow Town Centre Area Action Plan. The aim is for Harlow to continue to be a sub-regional centre, competing with towns such as Bishop's Stortford, the Brookfield Centre, Hertford, Stevenage and Chelmsford, by having an improved retail offer, new commercial leisure provision, an enhanced physical environment and more business space.

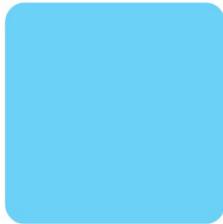
**2.43 To provide the workforce for employers in order to retain and attract new businesses**

Harlow needs to facilitate a successful, growing and attractive employment base serving both local and regional economies. To achieve this, Harlow will need to be an attractor for a wide range of businesses ranging from smaller local firms to larger multi-national companies. High quality housing must be attractive to prospective employers and employees. Additional housebuilding and related development will boost employment opportunities across a range of sectors that will support the local employment base.

**2.44 To deliver major infrastructure**

Major infrastructure enhancements are required to attract investors, businesses and therefore to improve economic aspirations in Harlow. Residential growth, located, managed and phased appropriately, will help to provide the investment needed to deliver infrastructure requirements including improvements to the walking and cycling network and public transport, the local and strategic road network and social infrastructure such as education and health, including the future requirements of the Princess Alexandra Hospital.

**2.45 Significant behavioural change is required in the population of Harlow in order to deliver the enhancements needed to ensure Harlow is an attractive, sustainable and healthy town for residents, businesses and visitors.**



**CONTEXT, VISION AND OBJECTIVES**

**3. Spatial Vision and  
Local Plan Strategic Objectives**



### 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES

3.1 The Spatial Vision for Harlow to 2033 (see Fig. 3.1) and the Local Plan Strategic Objectives (see Fig. 3.3) illustrate how the Local Plan will shape the district for future generations.

Fig. 3.1: Spatial Vision for Harlow to 2033, based on the Harlow Corporate Plan

By 2033, Harlow will have:

- regained its reputation as a place of aspiration, innovation and prosperity;
- secured its role as a key urban centre that has benefited from growth, regeneration and sustained investment in infrastructure, services and facilities;
- provided sufficient new homes to meet local needs, providing opportunities to those unable to purchase open market housing, through a significant increase in the provision of affordable homes;
- a reputation as a location for high tech industries, research and development, advanced manufacturing and information technology, and the disparity between the skills and qualifications of Harlow residents compared to visitors will be significantly reduced;
- excellent education facilities, which the varied, vibrant and aspiring communities will be taking advantage of; and
- become famous for its quality and quantity of public art, building on its status as a sculpture town.

Harlow's residents will be more active, taking advantage of Harlow's excellent sporting, leisure and cultural facilities. The overall health and wellbeing of Harlow's residents will be improved.

The perception of Harlow as a declining economic centre will have been reversed through the success of the Enterprise Zone sites and securing the status of the district as a prime business location and retail destination.

The district's economy will be diversified and there will be a wide range of employment opportunities across Harlow, fit for a modern and dynamic economy.

New development will have revitalised key areas. A programme of urban renewal will have replaced poorer housing stock with modern and sustainable buildings; this will have been complemented by a programme of selective development in locations across the district as part of a holistic programme of regeneration and redevelopment.

Major progress will have been made to address Harlow's health and wealth inequalities as well as addressing localised deprivation across the district's deprived neighbourhoods.

The amount of vacant and underused land in the district will have been minimised. Urban expansion of Harlow will be complete and residents will see the benefits of the growth through better infrastructure and other facilities and services across the district. The Town Centre, Neighbourhood Centres and Hatches will be thriving mixed-

use areas benefiting from an improved public realm and increased activity.

Harlow will have retained a network of Green Wedges, supplemented by a number of Green Fingers. The district's Green Infrastructure, including green and open spaces, will be of consistently high quality and better connected to residential areas, providing multifunctional opportunities for residents and wildlife. Residents will also benefit from improved access to the countryside surrounding Harlow.

The land use and transport policies will be co-ordinated to ensure the maximum possible increase in passenger transport, walking and cycling. Major investment will be underway to address a number of specific transport capacity issues which are currently restricting growth and investment. This investment will include a new junction on the M11 (Junction 7a); substantial improvements to the internal road network, including support for a northern bypass beyond the Local Plan period; and the provision of an improved railway network through Crossrail 2 and/or four-tracking of the West Anglia mainline.

New development will minimise the use of global resources, support the development of good waste management, mitigate and adapt to the effects of climate change, and ensure a net gain in biodiversity is delivered. Development will be innovative in design and construction and new buildings will be energy efficient and use as much energy from renewable sources as possible.

- 3.2 The Council's Corporate Priorities (see Fig. 3.2) are reflected in the Local Plan Strategic Objectives (see Fig. 3.3). The Objectives consider the identified challenges, reflecting the social, economic and environmental characteristics of the district. The Objectives also provide the framework to monitor the success of the Local Plan. These have been divided into five key themes – Placeshaping, Housing, Prosperity, Lifestyles and Infrastructure.

Fig. 3.2: Harlow Council Corporate Priorities (2018)

#### HARLOW COUNCIL CORPORATE PRIORITIES

1. More and better housing
2. Regeneration and a thriving economy
3. Wellbeing and social inclusion
4. A clean and green environment
5. Successful children and young people

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Fig. 3.3: Local Plan Strategic Objectives

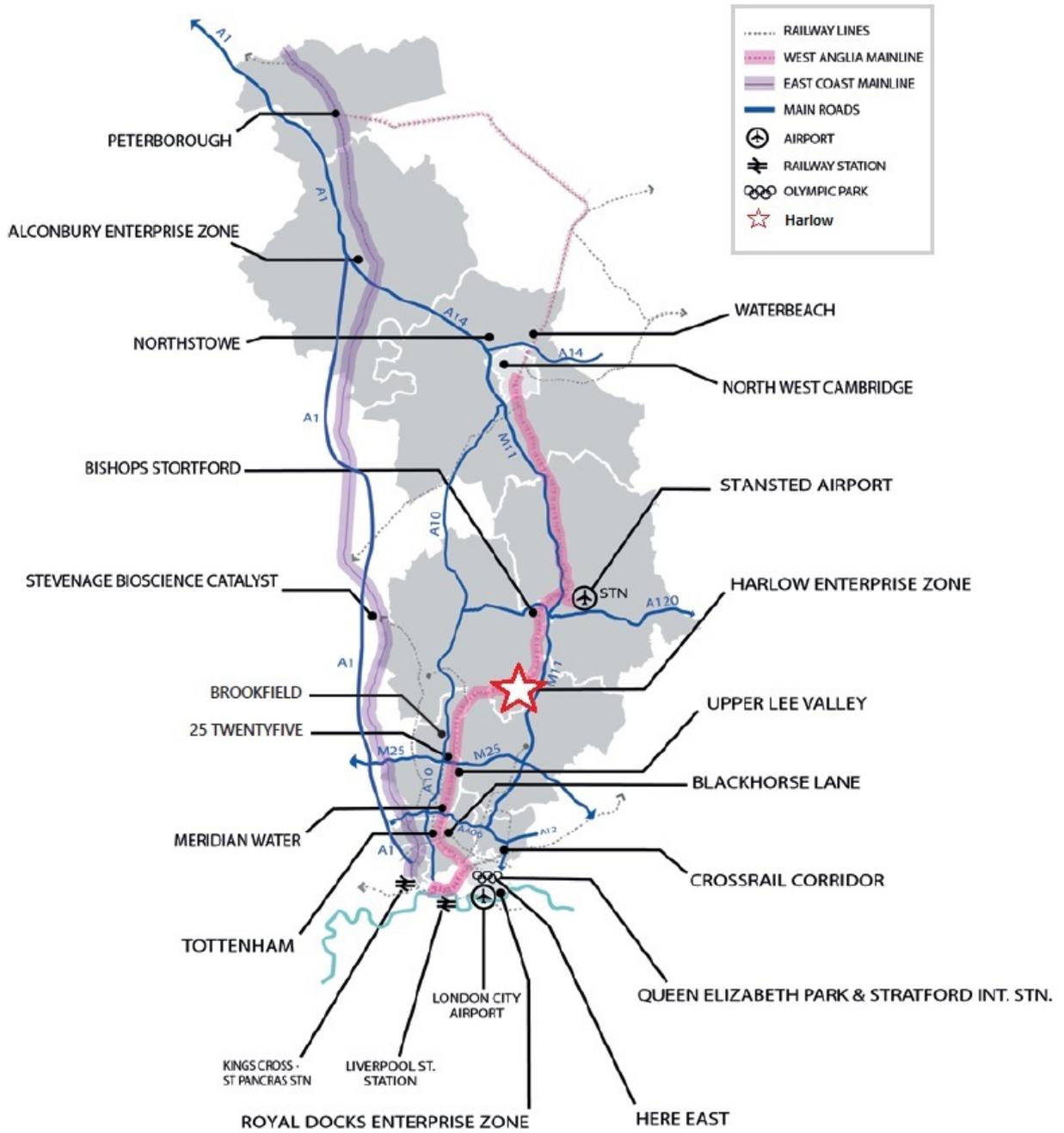
LOCAL PLAN THEME	LOCAL PLAN STRATEGIC OBJECTIVES	LINKED CORPORATE PRIORITY/IES
<b>PLACESHAPING</b> <i>(Enhancing the quality of the built and natural environment)</i>	<ol style="list-style-type: none"> <li>1. Create and enhance high quality built environments which are well connected to revitalised green spaces</li> <li>2. Deliver high quality design through new development whilst protecting and enhancing the district’s historic environment</li> <li>3. Adapt to and mitigate the impacts of climate change</li> </ol>	A clean and green environment
<b>HOUSING</b> <i>(Delivering housing at the right scale, of the right type and in the right location to meet the whole community’s needs)</i>	<ol style="list-style-type: none"> <li>4. Identify sites to meet local housing needs both now and in the future</li> <li>5. Provide a range of suitable housing for the community including a range of tenure and type</li> <li>6. Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates</li> </ol>	More and better housing
<b>PROSPERITY</b> <i>(Securing economic growth &amp; regeneration to improve employment &amp; educational opportunities in the district &amp; reflect its strategic role)</i>	<ol style="list-style-type: none"> <li>7. Meet the employment needs of the district by diversifying and investing in the district’s employment base</li> <li>8. Secure economic revitalisation and reinforce Harlow’s reputation as a key centre for Research and Development</li> <li>9. Improve educational opportunities and the skills base of local residents</li> <li>10. Provide a range of shopping needs for local residents and the wider sub-region by regenerating the Town Centre and protecting and enhancing Neighbourhood Centres and Hatches</li> </ol>	Regeneration and a thriving economy; and Successful children and young people
<b>LIFESTYLES</b> <i>(Sustainably meeting the leisure, recreational and cultural requirements of the community)</i>	<ol style="list-style-type: none"> <li>11. Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district</li> <li>12. Provide opportunities to improve the overall health and wellbeing of Harlow’s residents</li> </ol>	Wellbeing and social inclusion
<b>INFRASTRUCTURE</b> <i>(Ensuring growth and regeneration is supported by appropriate infrastructure provision)</i>	<ol style="list-style-type: none"> <li>13. Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities</li> <li>14. Reduce the need to travel by vehicle and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport</li> <li>15. Improve transport links, particularly for sustainable modes of transport, to access all facilities and jobs</li> <li>16. Enhance and promote the role of Harlow as a transport interchange along the M11</li> </ol>	Regeneration and a thriving economy

## London Stansted Cambridge Consortium

- 3.3 The London Stansted Cambridge Consortium (LSCC) is a strategic partnership of public and private organisations covering the area north of the Royal Docks and Tech City (London) up through the Lee Valley, the M11, A10 and West Anglia Mainline corridors to Stevenage, Harlow and Stansted and through to Cambridge and Peterborough. The extent of the area is shown in Fig. 3.4, overleaf. The partnership was formed to organise and promote a distinct economic area with strong inter-connections, commuting to work and learn patterns, clusters of industries and supply chains.
- 3.4 At the heart of the LSC Corridor is the 'Core Area' of Harlow, Epping Forest, East Hertfordshire, Uttlesford and Broxbourne. This Core Area is a key location in the LSC Corridor and is set to bring forward substantial growth over the Local Plan period and beyond. It was agreed by the respective local authorities and the LSCC that a co-ordinated approach needs to be taken forward to deliver growth in the area.
- 3.5 The LSCC vision (see Fig. 3.5) sets out the growth and economic ambitions for the Core Area and this will in turn form part of a wider strategic sustainable growth framework. The framework will pull together existing and forthcoming work on transport and social and community infrastructure and put this in the form of a prospectus to make the strategic case for investment in the Core Area.

*Chapter continues on next page.*

Fig. 3.4: London – Stansted – Cambridge Corridor



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Chapter continues on next page.

Fig. 3.5: Vision for the LSCC Core Area

The Core Area will build on its key strengths including its skilled workforce in sectors such as health, life sciences and pharmaceuticals, advanced engineering and aerospace, its high quality environment and educational opportunities. Together with Stansted Airport, the local authorities will deliver sustainable growth which supports the economic ambitions of the LSCC and the UK through:

- complementing and supporting the economic performance of the Corridor whilst maintaining and enhancing the special character of the area, including the locally distinctive historic character of its market towns and rural settlements;
- the delivery of housing, supported by good access to social, leisure, community and health facilities, education and jobs, which meets the needs of local people and support sustainable economic growth, whilst ensuring it remains an attractive place for people to live and locate to;
- capitalising on existing economic sectors and promoting growth of expanding industries including in the food production, life sciences, pharmaceuticals and technology sectors; tourism including hotels, Stansted's expansion, recreation/green assets including the Lee Valley, Stort Valley, Epping Forest and Hatfield Forest National Nature Reserve;
- working with partners to protect and enhance the high quality environment, its unique landscapes and places of special wildlife value. This would be achieved by place-shaping initiatives which would include measures to conserve areas of high biodiversity; the provision of new, alternative green spaces for people and wildlife; and the increase of green infrastructure connections between these areas, to provide greater opportunities for more sustainable access to nature for everyone living in the corridor;
- working with partners to secure investment in major infrastructure including increasing rail capacity on the West Anglia Mainline and maximising the opportunities that Crossrail 2 can deliver, together with road improvements including a new junction on the M11 at 7a and improvements to junctions 7 and 8, and to the A414 A120, A10 and M25; and delivery of superfast broadband;
- supporting the delivery of new jobs in the Harlow Enterprise Zone, and the north side of Stansted Airport, Broxbourne Park Plaza, Brookfield and Bishop's Stortford - all identified as Strategic Opportunity Sites within the corridor; and
- the regeneration of existing urban areas including at Harlow, Waltham Abbey, Loughton and Waltham Cross.

The Core Area supports the development and sustainable growth of Greater Harlow and key growth locations at Broxbourne, Brookfield and Bishop's Stortford together with Stansted Airport growing to its full permitted capacity and as a business growth hub. These centres, with proportionate growth throughout the wider area, and the right investment, would create an economic powerhouse.

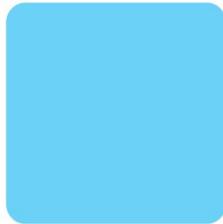
Putting in place these critical building blocks will provide the foundations for looking further ahead to 2050. Certainty through further investment and delivery of key infrastructure, including in the West Anglia mainline, Crossrail 2, the M11 junctions, M25 junctions, A414, A120 and A10 is a vital component of this.

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**CONTEXT, VISION AND OBJECTIVES**  
**4. Spatial Development Strategy**



## 4. SPATIAL DEVELOPMENT STRATEGY

- 4.1 The Spatial Development Strategy sets out in broad terms how the Vision for Harlow and the Themes and Strategic Objectives of the Local Plan will be achieved and delivered. The Strategy has three key aims:
- (a) to protect and enhance the important parts of Harlow which offer residents a good quality of life;
  - (b) to proactively change areas within Harlow through new development to improve living standards for existing and future residents; and
  - (c) to bring forward substantial growth to sustain Harlow as a sub-regional centre.
- 4.2 The Strategy identifies:
- (a) the strategic development sites and wider growth aspirations for the Harlow area;
  - (b) the number of new homes to be built;
  - (c) where new jobs will be created;
  - (d) what new retail provision will be made;
  - (e) how the district will grow and develop to become a more desirable, sustainable and prosperous place to live, visit, work and invest in; and
  - (f) how the Local Plan incorporates the presumption in favour of sustainable development, in accordance with national policies.
- 4.3 The Strategy will be delivered through:
- (a) the Strategic policies in the Strategic Growth Strategy;
  - (b) the Development Management policies; and
  - (c) the Policies Map.

### Placeshaping

- 4.4 Placeshaping refers to the enhancement of the built and natural environment and, in order to support this theme, the Local Plan protects and strengthens Harlow's Green Wedges and other Green Infrastructure and ensures that new development will have clear connections to these assets.
- 4.5 New development will incorporate sufficient open space and Green Infrastructure, protect and integrate existing landscape assets, and enhance, retain and protect biodiverse habitats to ensure a net gain in biodiversity is delivered. The district's natural assets, including the River Stort and protected areas such as Sites of Special Scientific Interest and Local Wildlife Sites, will be protected and enhanced.
- 4.6 New development in Harlow must take into consideration the original concept of the New Town and the principles of Gibberd's master plan which include:
- (a) the provision of neighbourhoods positioned around Neighbourhood Centres;
  - (b) an appreciation of local character and landscape setting;
  - (c) the retail hierarchy of the Town Centre, Neighbourhood Centres and Hatches;
  - (d) the separation of employment uses from residential areas;

- (e) a network of Green Wedges and Green Fingers which dissect the built form; and
  - (f) schools and community facilities within walking distance.
- 4.7 New development must also have regard to The Town and Country Planning Association's Garden City Principles, the Harlow Design Guide and the Harlow and Gilston Garden Town Vision and Design Guide. A strong built form and a high quality townscape will be promoted, which is well integrated into the surroundings and supplemented by public art. The historic environment, including listed buildings, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens, will be conserved, protected and enhanced.
- 4.8 Within the district, greater accessibility will be promoted to further improve connections between existing and future urban areas and green spaces. These links will be functional, safe and attractive.

## Housing

- 4.9 The Local Plan identifies sites to deliver at least 9,200 dwellings over the Local Plan period, with the expectation that in residential developments of more than 10 dwellings, at least 30% affordable housing is provided. This reflects the Objectively Assessed Housing Need (OAHN) and the Viability Study, as required by national policies. These new homes will be provided within the administrative boundary of Harlow and will accord with the placeshaping principles. New development will provide a variety of house types and tenures, which will reflect the needs of the future population including provision for specialist accommodation.
- 4.10 The Local Plan seeks to maximise the use of previously developed land for new homes and minimise the impact on the environment. This capitalises on opportunities for regeneration and redevelopment, taking advantage of nearby services and facilities, making the best use of walking, cycling and public transport links.
- 4.11 Given the overall housing need, it has been necessary to allocate a strategic housing site on open land in the east of the district, which forms part of a new Garden Community in the wider Harlow and Gilston Garden Town. This site is capable of accommodating 2,600 dwellings in Harlow in the Local Plan period, including much-needed affordable housing, a new primary school, open space provision and other community facilities. It will also provide and enhance connections to existing Green Infrastructure in the area.
- 4.12 To support the district's wider growth strategy and sustain the district as a sub-regional centre for retail, employment and other wider community facilities, new Garden Communities are to be provided in the Harlow and Gilston Garden Town. The Communities are located around the periphery of Harlow, mostly outside the district boundary, as follows:
- South of Harlow (Latton Priory), within Epping Forest District;
  - West of Harlow (Water Lane Area), within Epping Forest District;
  - Strategic Housing Site East of Harlow, partly within Harlow District and partly within Epping Forest District; and

- Gilston Area, within East Hertfordshire District.
- 4.13 The locations of the new Garden Town Communities have been chosen based on the evidence prepared to date. They are well connected to Harlow, meaning residents of the new communities will be able to have direct access to jobs and sub-regional services. The Green Belt ensures the wider countryside remains protected from unrestricted sprawl and encroachment. As the new communities are part of the wider Harlow and Gilston Garden Town, the Garden Town design principles will form part of the masterplanning of the communities in accordance with the Garden Town Vision and Design Guide.
- 4.14 The new Garden Communities and other sites identified in Harlow together provide 16,100 dwellings in the Harlow and Gilston Garden Town over the Local Plan period.

### Prosperity

- 4.15 It has been identified that approximately 18 to 20ha of additional employment land is required over the Local Plan period. The district's main existing employment areas are at Templefields, The Pinnacles (including the Business Park) and London Road, with smaller employment areas at Neighbourhood Centres. The employment areas will be protected, their environments enhanced and a range of employment uses encouraged in order to attract new investment and businesses. The Local Plan allocates 21ha of future employment land over the Local Plan period.
- 4.16 The district's Enterprise Zone will provide over 100 new businesses with the potential to create up to 5,000 jobs over 25 years. The Enterprise Zone comprises London Road North (Harlow Science Park), London Road South (Kao Park) and Templefields North East. London Road North will be developed as a new science and IT park in an attractive campus-style environment, building on the site's direct linkages to London and Cambridge and specialising in MedTech and Advanced Manufacturing. London Road South will provide office accommodation and data centres.
- 4.17 The sites will become home to large multinational companies in purpose-built offices, start-ups and entrepreneurs housed within an Innovation Centre, with Small and Medium Enterprises (SME) occupying 'grow-on' space. Templefields North East will see the redevelopment of ageing industrial stock and a predominant focus on manufacturing for SMEs and start-up companies. A new road/pedestrian link to Cambridge Road will be provided to improve connections to the site from the highway network and railway station.
- 4.18 To achieve economic prosperity and regeneration, the Local Plan will support training and other educational opportunities within the district.
- 4.19 It has been identified that additional retail floorspace is required over the Local Plan period to meet the future needs of residents and businesses in and around Harlow. This will ensure the town centre maintains and enhances its sub-regional status. An Area Action Plan will guide the redevelopment of the town centre.

- 4.20 A proportion of retail floorspace will also be delivered in the district's Neighbourhood Centres and Hatches through redevelopment opportunities. New Neighbourhood Centres and Hatches may be required in new strategic housing developments.

## Lifestyles

- 4.21 To improve the living standards and lifestyles for the district's existing and future residents, new development will provide relevant community facilities. This includes leisure and sporting facilities, playing pitches, playgrounds, allotments, community halls and places of worship which will help reduce deprivation levels and promote healthy and active lifestyles.
- 4.22 The Local Plan aims to ensure that footpaths, cycleways, bridleways and other Green Infrastructure routes are safe, accessible and well connected to services and facilities. This will encourage their use and help improve the health and wellbeing of residents and other users.
- 4.23 The new Garden Town Communities will be well connected to existing community facilities and the network of cycle and pedestrian paths which will contribute to providing for the leisure and sporting needs.
- 4.24 The Local Plan supports existing leisure and recreational attractions. These include the River Stort, Parndon Wood Nature Reserve and Harlow Town Park, Harlow Playhouse, Harlow Museum, the Gibberd Gallery and Gibberd House and Gardens. The development of a night-time economy in the town centre and the provision of hotel accommodation, building on links to Stansted Airport and London, will boost tourism in the district.
- 4.25 The policies in the Local Plan, as a whole, aim to improve the overall health and wellbeing of residents by ensuring that there is access to jobs and education opportunities; improving infrastructure for more sustainable, active and healthy transport choices; protecting and enhancing the natural and historic environment for the benefits of residents; providing leisure, recreation, sporting and retail facilities; and creating well-designed developments.
- 4.26 The Local Plan will ensure there is sufficient health infrastructure in place to support new development. To support these objectives, the Harlow Health and Wellbeing Strategy and the Essex Joint Health and Wellbeing Strategy will be a material consideration in the determination of planning applications.

## Infrastructure

- 4.27 The Spatial Development Strategy will be underpinned by the necessary supporting infrastructure, with development phased over the Local Plan period to ensure that the correct levels of infrastructure are provided.
- 4.28 In order to help promote Harlow as a growth location along the M11 corridor, improvements will be made to the strategic transport network. This includes

working with the Highway Authority and Highways England to improve Junction 7 of the M11 and to ensure the delivery of the new Junction 7a further north. Improvements will be made to the local highway network, the footway and cycle networks and public transport network to improve connections within Harlow and to areas outside the district. This will include the provision of sustainable transport corridors through Harlow.

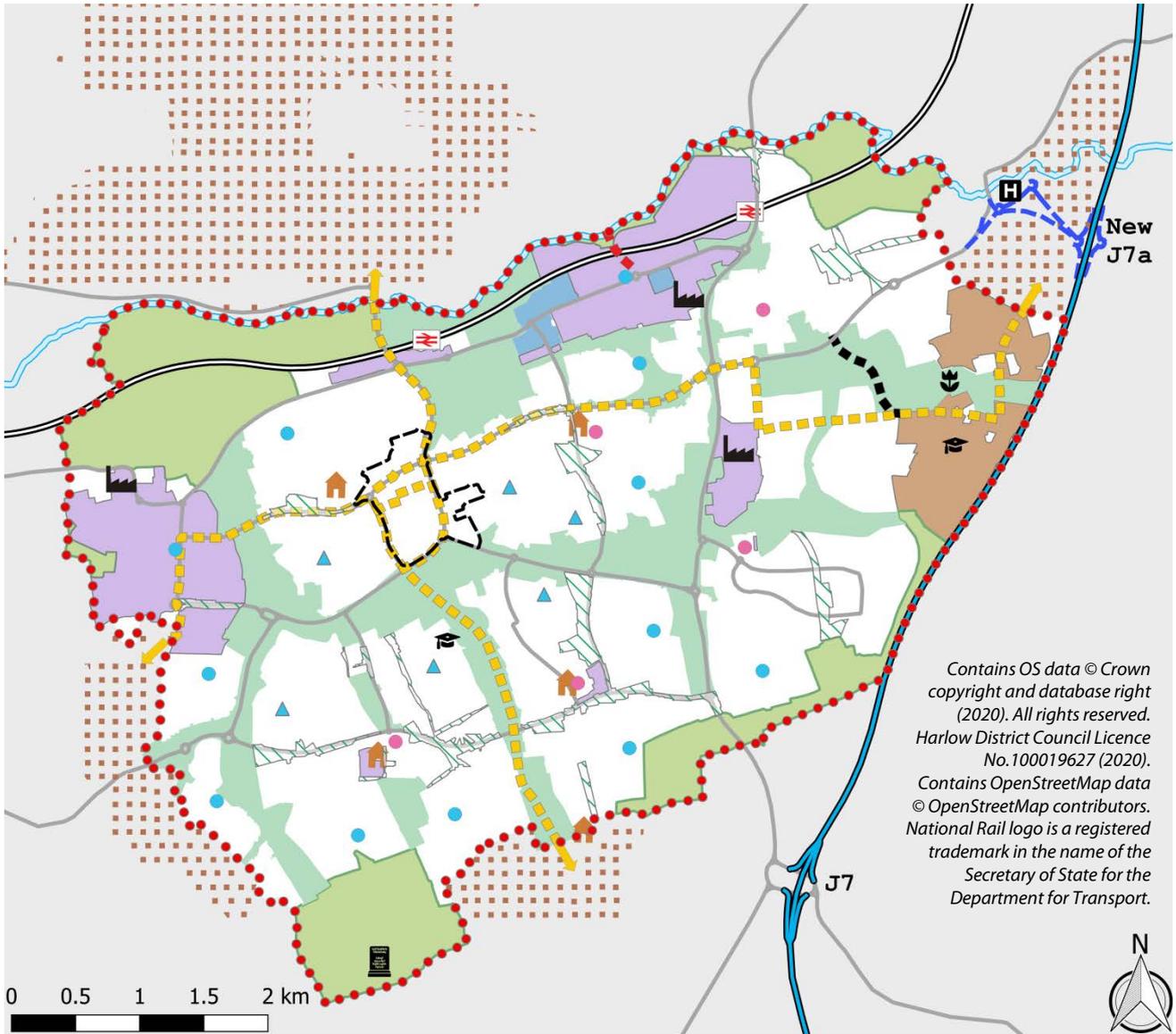
- 4.29 The Council will work with Network Rail and the local railway operator to improve journey reliability, frequency, capacity and overall comfortability for train users using the West Anglia Mainline. The Council supports the provision of Crossrail 2 to Harlow, with the terminus at Harlow Town railway station. The Council also supports the four-tracking of the West Anglia mainline.
- 4.30 The Local Plan will deliver primary schools as well as an expansion of existing primary schools where necessary, the provision of secondary schools and other childcare facilities. These will be provided as part of the delivery of the new Garden Communities in the wider Harlow and Gilston Garden Town.
- 4.31 The Council will work with the relevant utility providers to ensure that new homes have connections to clean water, wastewater, gas, electricity and broadband. All residents will have access to healthcare through the provision of local GP surgeries and by supporting the possible relocation of Princess Alexandra Hospital in order for it to expand and improve.

*Chapter continues on next page.*

**Key Diagram**

4.32 The Key Diagram (Fig. 4.1) graphically represents the Spatial Development Strategy.

Fig. 4.1: Key Diagram



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**Legend**

- Green Wedge
  - Green Finger
  - Green Belt
  - Town Centre
  - Neighbourhood Centre
  - Hatch
  - Hatch identified for mixed use regeneration
  - Retail Warehouse Area
  - Employment land
  - New employment land
  - Allocated housing site of 30 or more dwellings
  - Indicative new Stort Crossing
  - Indicative new Sustainable Transport Corridor linking to the Garden Communities
  - Indicative new access for East of Harlow Strategic Housing Site
  - New route from Junction 7a to Harlow
  - New education facility
  - Cemetery expansion
  - Indicative location of new allotments
  - Indicative location of new hospital
  - Railway station
  - M11
  - Major road
  - Railway
  - River Stort
  - District boundary
- New Garden Communities:**
- Strategic Housing Site East of Harlow
  - Sites outside Harlow

*This diagram is not a definitive map of policies or designations. Due to the map scale, locations may not be exact and some features appear to overlap where they may not in reality. The Policies Map should be consulted for accurate boundaries and locations of features and designations.*

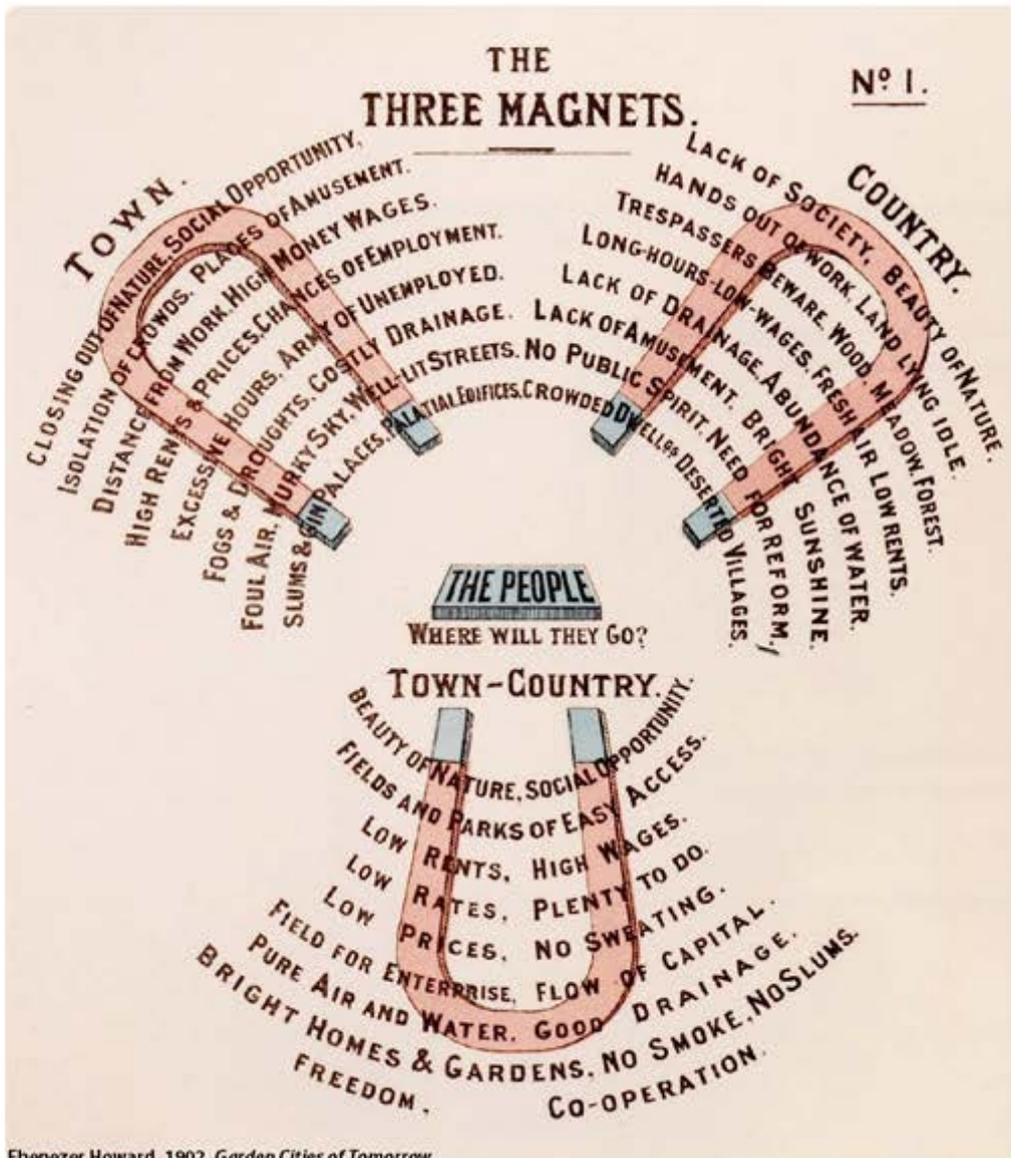
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## STRATEGIC GROWTH STRATEGY FOR THE HARLOW AREA

# 5. Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town



# STRATEGIC GROWTH STRATEGY FOR THE HARLOW AREA

## 5. DEVELOPMENT AND DELIVERY OF GARDEN COMMUNITIES IN THE HARLOW AND GILSTON GARDEN TOWN

### Introduction

- 5.1 The Local Plan has been informed by the guiding principles of Sir Frederick Gibberd's original master plan for Harlow as a planned New Town. These principles have shaped Harlow's distinctive urban form and landscape character and will help underpin the development and delivery of Garden Communities across the Harlow and Gilston Garden Town.
- 5.2 Harlow and Gilston Garden Town comprises the whole of Harlow, together with four new Garden Town Communities planned on Garden City principles, as follows:
- South of Harlow (Latton Priory);
  - West of Harlow (Water Lane Area);
  - East of Harlow; and
  - Gilston Area (including seven villages).
- 5.3 The proposals for the Harlow and Gilston Garden Town are based upon a common set of values, objectives and a commitment to secure the delivery of growth across the area, reflecting close cross-boundary working, through the Duty to Co-operate, between Harlow, Epping Forest and East Hertfordshire District Councils and strategic partners.
- 5.4 The four Garden Town Communities will be well connected and not considered in isolation to the urban fabric of Harlow. The master plan processes for these sites must integrate with and regenerate neighbouring areas of Harlow.
- 5.5 Harlow and Gilston Garden Town lies in the core area of the London Stansted Cambridge Corridor, one of the most important and fastest growing economic growth areas in the country. The Councils are committed to delivering sustainable growth to support the economic ambitions of the Corridor through the delivery of housing, supported by good access to social, leisure, community, health facilities, education and jobs, that meet the needs of local people whilst ensuring the area remains an attractive place for people to live, work and locate to.

- 5.6 The collective commitments in the three Local Plans of Harlow, Epping Forest and East Hertfordshire District Councils set out the framework for housing delivery in the Harlow and Gilston Garden Town and demonstrate that the local level of ambition is high and there is a strong desire and commitment to achieve far more than the norm in terms of delivering growth at an accelerated rate.
- 5.7 Policy HGT1 provides a framework to ensure a consistent approach for the consideration of development proposals in Harlow and complements the policy approach being taken towards such development in the Epping Forest and East Hertfordshire District Local Plans. The policy is supported by more detailed Strategic and Development Management policies in the Harlow Local Plan.

### Corporate Priorities

- 5.8 This chapter and the policy contained within it will help deliver all of the Council's Corporate Priorities, as follows:
- **More and better housing**
  - **Regeneration and a thriving economy**
  - **Wellbeing and social inclusion**
  - **A clean and green environment**
  - **Successful children and young people**

### Local Plan Strategic Objectives

- 5.9 This chapter and the policy contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 1 - Create and enhance high quality built environments which are well connected to revitalised green spaces**
  - **Objective 2 - Deliver high quality design through new development whilst protecting and enhancing the district's historic environment**
  - **Objective 3 - Adapt to and mitigate the impacts of climate change**
  - **Objective 4 - Identify sites to meet local housing needs both now and in the future**
  - **Objective 5 - Provide a range of suitable housing for the community including a range of tenure and type**
  - **Objective 6 - Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates**
  - **Objective 9 - Improve educational opportunities and the skills base of local residents**
  - **Objective 10 - Provide a range of shopping needs for local residents and the wider sub-region by regenerating the Town Centre and protecting and enhancing Neighbourhood Centres and Hatches**
  - **Objective 11 - Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**

- **Objective 12 - Provide opportunities to improve the overall health and well-being of Harlow's residents**
- **Objective 13 - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities**
- **Objective 14 - Reduce the need to travel by vehicle and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport**
- **Objective 15 - Improve transport links, particularly for sustainable modes of transport, to access all facilities and jobs**

## HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town

1. Four strategic Garden Town Communities are planned in the Harlow and Gilston Garden Town and the relevant site/s are allocated in the Harlow, Epping Forest and East Hertfordshire District Local Plans:
  - (a) **South of Harlow (Latton Priory)** – delivering approximately 1,050 dwellings over the Local Plan period (within the Epping Forest district);
  - (b) **West of Harlow (Water Lane Area)** – delivering approximately 2,100 dwellings over the Local Plan period (within the Epping Forest district);
  - (c) **East of Harlow** – delivering approximately 3,350 dwellings over the Local Plan period (750 dwellings within Epping Forest District and approximately 2,600 dwellings within the Harlow district);
  - (d) **Gilston Area (including seven villages)** - delivering approximately 3,000 dwellings over the Local Plan period with a further 7,000 dwellings beyond the Local Plan period (within the East Hertfordshire district).
2. As the focus of the Garden Town, Harlow Council will expect the design, development and phased delivery of each Garden Town Community to accord with all the following principles:
  - (a) the public sector working pro-actively and collaboratively with the private sector to:
    - (i) secure high-quality place-making;
    - (ii) ensure the timely delivery of on-site and off-site infrastructure required to address the impact of the new communities; and
    - (iii) provide and fund a mechanism for future stewardship, management, maintenance and renewal of community infrastructure and assets;
  - (b) community and stakeholder involvement in the design and delivery from the outset and the delivery of a long-term community engagement strategy;
  - (c) prior to the submission of outline planning applications, developers must submit a supporting statement setting out a sustainable long-term governance and stewardship arrangement for the community assets, including heritage assets, Green Infrastructure, the public realm, community facilities and other relevant facilities to be funded by the developer;

- (d) a Strategic Master Plan must be developed in general conformity with the Harlow and Gilston Garden Town Vision and Design Guide and have regard to the original guiding principles established by Sir Fredrick Gibberd's master plan for Harlow including the Green Wedge network;
- (e) Strategic Master Plans and detailed design proposals must be reviewed and informed by the independent Quality Review Panel and be consistent with and adhere to any relevant Design Codes;
- (f) on-site and off-site infrastructure is provided, subject to viability considerations, ahead of or in tandem with the proposed development to mitigate any impacts, to meet the needs of existing and future residents and visitors and to establish sustainable travel patterns;
- (g) ensure balanced and inclusive communities by providing a mix of housing of different sizes, tenures and types, including provision for self- and custom-built houses and specialist accommodation;
- (h) provide and promote appropriate opportunities for small-scale employment generating uses;
- (i) create a step change in modal shift by contributing to the delivery of the Sustainable Transport Corridors and establishing an integrated, accessible and safe transport system which reduces car use and maximises the use of the sustainable high quality transport modes of walking, cycling and the use of public and community transport to promote healthy lifestyles and provide linkages to and from Harlow and the new Garden Town Communities;
- (j) create sociable, vibrant, healthy and walkable neighbourhoods with access for all residents to a range of local employment opportunities, community services and facilities;
- (k) compliance with specific parking standards which recognise that car ownership will need to be accommodated without impacting on the quality of place whilst making the best use of land;
- (l) create distinctive environments which relate to the surrounding area, take full account of topography and landform, protect or enhance natural and historic landscapes, systems and wider historic environment, Green Infrastructure and biodiversity. The layout should respond to and extend, where possible, the existing network of Green Wedges and Green Fingers in the district;
- (m) ensure mitigation from and adaptation to climate change is secured through design and construction methods;
- (n) ensure that the costs and benefits of developing new Garden Town Communities are shared by landowners and developers with appropriate measures put in place to equalise and apportion the costs of shared infrastructure and associated land contributions;
- (o) a Heritage Impact Assessment will be required to inform the design of the Garden Town Community to ensure heritage assets within and surrounding the site are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design as identified through the Heritage Impact Assessment;
- (p) key transport interventions (such as M11 J7a) and provision of sustainable transport (providing viable alternatives to the private car) will need to be agreed prior to the development being permitted. Measures to ensure future

- upkeep/maintenance of sustainable transport provision will be required;
- (q) Inclusion of any measures necessary to safeguard wildlife sites beyond the district boundary in accordance with Policy WE4.

Developers will be expected to make a fair and reasonable contribution to the strategic highway and other infrastructure requirements set out in the Infrastructure Delivery Plan.

## Justification

- 5.10 Harlow, Epping Forest and East Hertfordshire District Councils are working in partnership with Hertfordshire County Council, Essex County Council, Hertfordshire Local Enterprise Partnership, South East Local Enterprise Partnership, land owners and promoters to enable the delivery of transformational growth at the Harlow and Gilston Garden Town. The Garden Town lies in the core area of the London Stansted Cambridge Corridor.
- 5.11 The Councils are committed to delivering sustainable growth to support the economic ambitions of the Corridor through the delivery of housing, supported by good access to social, leisure, community, health facilities, education and jobs, that meet the needs of local people whilst ensuring the area remains an attractive place for people to live and locate to.
- 5.12 The collective Local Plans' commitments for housing delivery, in the Harlow and Gilston Garden Town, demonstrate that the local level of ambition is high and there is a strong desire and commitment to achieve far more than the norm in terms of delivering growth.
- 5.13 The Harlow and Gilston Garden Town represents a major opportunity at the heart of the London Stansted Cambridge Corridor to accommodate approximately 16,000 dwellings up to 2033 and new employment opportunities. The Garden Town enables the Councils to focus development where it is needed and where it can be sustainably accommodated and maximise the longer-term economic potential of the area in a proactive way.
- 5.14 The Councils share a bold vision and set of objectives, recognising that areas in and around Harlow can deliver significant growth to achieve wider aspirations for economic and social prosperity, addressing housing market needs and infrastructure requirements and delivering regeneration.
- 5.15 The Harlow and Gilston Garden Town provides the framework to enable the development and identification of clear design principles tailored to the unique characteristics of Harlow and the Gilston area. The level of strategic growth proposed enables development proposals to be guided and influenced to achieve true Garden City ambitions and quality, yet still achieve development in an efficient and timely manner.

## Implementation

- 5.16 The sustainable development of the new Garden Town Communities will be framed by the objectives set out in the Town and Country Planning Association's (TCPA) nine key guiding Garden City principles, which originate from Ebenezer Howard's original Garden City principles. This will ensure the holistically planned development enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities.
- 5.17 To facilitate the delivery of the new Garden Town Communities based on Garden City principles, the Councils have prepared a Vision and Design Guide to provide an overarching spatial vision and a design guide for each Community that will inform Strategic Master Plans. The design principles and parameters reflect those for Garden Towns and Villages advocated by the TCPA and draw on contemporary interpretations of what a Garden Town Community can be, setting out key criteria and objectives for quality and character. An independent Quality Review Panel has been established to guide development proposals across the Garden Town and ensure that exceptional quality standards are achieved through new development, as developers must submit their proposals for assessment before pre-application.
- 5.18 The Councils have also prepared a Sustainable Transport Corridor Study for the Harlow and Gilston Garden Town. The Councils consider sustainable transport matters (including walking, cycling and public transport) as central to the successful growth of the Harlow and Gilston Garden Town. The Councils share an ambition to enhance established transport corridors and to create new sustainable travel corridors as part of managing overall travel demand and integrating new communities to Harlow, the Enterprise Zone and other employment areas through a choice of transport modes. Aspirations include a modal travel shift, meaning 60% of travel in the new Garden Town Communities and 50% in the existing area of Harlow would be by sustainable modes of transport.
- 5.19 The Councils are also working closely with partners to ensure the provision of new and improved infrastructure provision. This will include new community facilities, schools and healthcare facilities. The Councils are committed to continuing to work with the relevant healthcare authorities to ensure that new facilities are planned, including a potential future need to accommodate the relocation of the Princess Alexandra Hospital, as part of the Garden Town to meet future needs of the existing and future population.
- 5.20 The successful delivery of the new Garden Town Communities requires continued close joint working between relevant public and private sector partners. Each of the authorities is committed to ensuring that the new Garden Town Communities are as sustainable and high quality as possible and that the infrastructure needed to support them is delivered at the right time. This will require the local authorities to work very closely with the landowners within the proposed Garden Town Community locations. A number of delivery models are being considered, and an appropriate tailored approach will need to be used in relation to each new Garden Town Community.

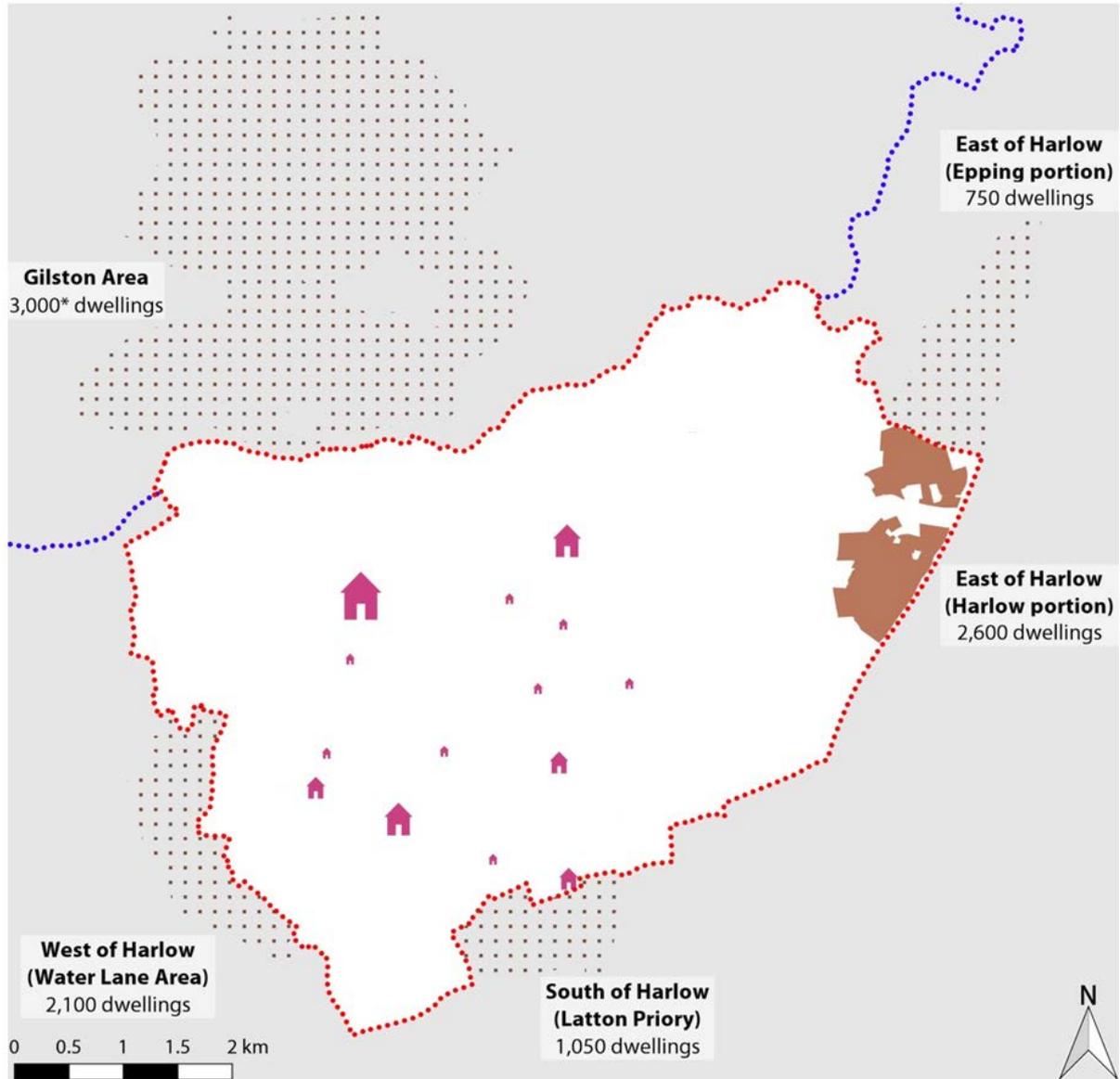
- 5.21 In order to ensure that a joined-up, collaborative and proactive approach is taken to the planning and implementation of the Garden Town Communities, Harlow, Epping Forest and East Hertfordshire District Councils require Strategic Master Plans to be produced in order to guide future development proposals. This will ensure that development proposals are ‘front-loaded’, recognising the scale and complexity of delivering the Garden Town Communities.
- 5.22 Each site will need to be delivered in accordance with the overall Garden Town programme, requiring a co-ordinated approach across the Garden Town Communities, and necessitating the involvement of a number of partners including the site owners/promoters, local communities, infrastructure providers and other stakeholders. This approach will help the Councils to secure the Garden City and placemaking objectives, whilst ensuring co-ordinated and timely delivery of development and infrastructure.
- 5.23 Harlow, Epping Forest and East Hertfordshire District Councils will oversee the production of Strategic Master Plans through the Garden Town Developer Forum. Planning applications and any other consenting mechanisms for the Garden Town Communities must be in accordance with the endorsed Strategic Master Plans.
- 5.24 While producing Strategic Master Plans, the Councils require ongoing widespread engagement to be undertaken with the local community and stakeholders. This should include an early engagement event and public consultation on the draft Strategic Master Plans prior to finalisation. Strategic Master Plans must be prepared in a form and manner which means that they are capable of adoption as SPDs.
- 5.25 To maintain the Green Infrastructure, public realm and community assets identified in the Strategic Master Plans, developers must submit, prior to outline planning permission, mechanisms for financing a sustainable long-term governance and stewardship arrangement for the community assets including Green Infrastructure, the public realm, community facilities and other relevant facilities. Such arrangements must include community representation to ensure residents have a stake in the long-term development, stewardship and management of their community.
- 5.26 The Garden Town Communities will provide flagship development, and Harlow Council will work with Epping Forest and East Hertfordshire District Councils to resolve any cross-boundary issues in delivery. The developments should promote high environmental standards in terms of energy efficiency, construction quality, design and low-carbon technologies, and set a high performance benchmark for future major development.
- 5.27 There are four strategic sites around Harlow, allocated as Garden Town Communities. One of these, the Strategic Housing Site East of Harlow, crosses the Harlow and Epping Forest District boundary. Harlow District Council cannot include specific policies for sites outside its boundaries but, as the Communities will be accessed through Harlow and use Harlow’s facilities, such developments have a direct interest to Harlow’s residents. It is especially important to maintain the connection of Harlow’s existing Green Infrastructure, footpaths, cycleways and bridleways to the countryside through the new Communities. It is, therefore,

appropriate for Harlow Council to support the specific site requirements for these strategic developments in the Epping Forest and East Hertfordshire Local Plans.

- 5.28 The components of the Harlow and Gilston Garden Town are mapped in Fig. 5.1, overleaf.

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Fig. 5.1:  
Components of the Harlow and Gilston Garden Town



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**Legend**

- Land for new Garden Community allocated in Harlow Local Plan\*\*
- Land for new Garden Community allocated in other Local Plans\*\*
- Harlow district boundary
- Epping Forest / East Hertfordshire district boundaries
- Land in adjoining districts

- Housing sites allocated in Harlow\*\*
- 10 - 19 dwellings
  - 20 - 39 dwellings
  - 40 - 70 dwellings
  - > 70 dwellings

Note: All dwelling figures are approximate.

\*3,000 dwellings to be delivered in the Gilston Area during the Local Plan Period, with a further 7,000 thereafter.  
\*\*New Garden Communities, and housing sites allocated in Harlow, to be delivered in accordance with the Harlow and Gilston Garden Town Vision and Design Guide.

This is not a definitive map of policies or designations. Due to the map scale, locations may not be exact and some features appear to overlap where they may not in reality. The Policies Map should be consulted for accurate boundaries and locations of features and designations.

***Strategic Housing Site East of Harlow - New Garden Town Community***

- 5.29 The Strategic Housing Site East of Harlow extends across the administrative boundary between Harlow District Council and Epping Forest District Council. The land within Harlow will provide 2,600 dwellings and land within Epping Forest will provide 750 dwellings. The development is required to provide community facilities including Early Years facilities, two sites of at least 2.1ha and 2.9ha in area for primary school provision and at least 10ha of land in addition to appropriate contributions towards a new secondary school. The development is also required to provide strategic Green Infrastructure. The development of the site provides the opportunity to resolve any flood risk issues, both on-site and downstream/upstream from it.
- 5.30 Highway and transport improvements, reflecting the outcomes of the Sustainable Transport Corridor Study, are also required. These include the provision of direct bus/walk/cycle access and linkage to/through the Newhall site as part of the Sustainable Transport Corridor improvements (to be consistent with the mitigation terms of the planning permission granted for the Newhall development). Linkages into other walking and off-road cycle networks will be required. In addition to Epping Forest's access requirement, Harlow will require the provision of additional access roads to the south. Suitable highway improvements will need to be agreed overall with Essex County Council as the Highway Authority. Satisfactory water supply and waste water network infrastructure is also required.

***South of Harlow (Latton Priory) - New Garden Town Community***

- 5.31 Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new site of at least 2.1ha in area for a primary school, and at least 10ha of land in addition to appropriate contributions towards a secondary school to serve new development. Strategic Green Infrastructure, including open space, walking and cycling routes, flood mitigation and wildlife space, will also be provided.
- 5.32 Approximately 1ha of B1 employment land will be provided at Dorrington Farm. This will provide opportunities for high quality employment uses to be incorporated within the Harlow and Gilston Garden Town, helping to promote sustainability whilst also linking to Harlow Town Centre.
- 5.33 Highway and transport improvements, including works to Southern Way and Second Avenue, are also required, as well as the provision of water supply and waste water network infrastructure.

***West of Harlow (Water Lane Area) – New Garden Town Community***

- 5.34 Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new site of at least 2.5ha in area for a primary school and appropriate contributions towards a secondary school to serve new development. Strategic Green Infrastructure, including open space, walking and cycling routes, flood mitigation and wildlife space, will also be provided.

- 5.35 Highway and transport improvements, reflecting the outcome of the Sustainable Transport Corridor Study, are also required. These include works to the Water Lane/A1169 roundabout, A1025/Abercrombie Way signals and traffic calming along the A1169.
- 5.36 As the Harlow West development will be adjacent to existing Harlow community facilities, opportunities to replace or improve or extend the primary school, health centre, sports centre, playing fields and recreation facilities should be considered to support the regeneration of this area.

#### *Gilston Area – New Garden Town Community*

- 5.37 The Gilston area is located in East Hertfordshire and will provide approximately 3,000 dwellings in the Local Plan period, with a further 7,000 dwellings being provided in the next Local Plan period. In addition it will provide community facilities including Early Years facilities, primary school and secondary school provision to serve new development. Strategic Green Infrastructure, including open space, walking and cycling routes, flood mitigation and wildlife space, will also be provided.
- 5.38 Highway and transport improvements will be required, reflecting the outcome of the Sustainable Transport Corridor Study, including a widened Central Stort Crossing between Eastwick roundabout and Burnt Mill roundabout, a new Second Stort Crossing between Eastwick Road in East Hertfordshire and River Way, a north-south Sustainable Transport Corridor from the Gilston area to the north of the Garden Town to Latton Priory to the south, and improved access to Harlow Mill Train Station and the four-tracking of the West Anglia Mainline.
- 5.39 Given its proximity to Harlow and its railway stations, residents of the Gilston area will have access to substantial employment opportunities both within the town itself and further afield. As well as providing benefits to East Hertfordshire, the development will support the regeneration of Harlow by helping to draw investment to the district and enhancing its economic performance.

#### *Princess Alexandra Hospital*

- 5.40 The District and County Councils will work co-operatively with all relevant stakeholders to ensure the future provision of high quality healthcare facilities and services, including the potential relocation of the Princess Alexandra Hospital (PAH), to serve the wider area. These facilities will respond effectively to planned and sustained growth and will be sited at the most sustainable locations. The replacement/relocation of PAH is considered to play an important role in this.
- 5.41 In March 2019, the PAH Board approved the recommended preferred way forward for the provision of a new hospital. This option comprises the development of a new state of the art local acute hospital. The hospital is to be located on approximately 12ha of greenfield land within the Epping Forest portion of the East of Harlow Garden Community.

**STRATEGIC GROWTH STRATEGY FOR HARLOW**  
**6. Promoting Sustainable Development**



**Harlow Local Development Plan**

# STRATEGIC GROWTH STRATEGY FOR HARLOW

## 6. PROMOTING SUSTAINABLE DEVELOPMENT

### Introduction

- 6.1 It is important that new development is focussed in sustainable locations, making the best use of existing resources and land to benefit current and future generations. The Local Plan has been developed around this principle and this is reflected in the policies.
- 6.2 The Local Plan also aims to manage the effects of climate change by adapting and mitigating against the impact of new development and changes of use.

### Corporate Priorities

- 6.3 This chapter and the policy contained within it will help deliver the following Council Corporate Priorities:
- **Regeneration and a thriving economy**
  - **Wellbeing and social inclusion**
  - **A clean and green environment**

### Local Plan Strategic Objectives

- 6.4 This chapter and the policy contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 2 - Deliver high quality design through new development whilst protecting and enhancing the district's historic environment**
  - **Objective 3 - Adapt to and mitigate the impacts of climate change**
  - **Objective 14 - Reduce the need to travel by vehicle and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport**

## SD1 Presumption in Favour of Sustainable Development

Development that accords with the Local Plan will normally be supported, unless material considerations indicate otherwise.

Where there are no policies specifically relevant to the proposed development or the relevant policies are out-of-date, it will normally be supported, unless material considerations indicate otherwise and/or either of the following apply:

- (a) any adverse impacts arising from the development would significantly and demonstrably outweigh the benefits, when assessed on national planning policies;
- (b) specific national planning policies indicate that the development should be restricted.

### Justification

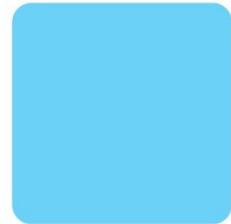
- 6.5 In order to accord with national planning policies, the Council will take a positive approach to development proposals, reflecting the presumption in favour of sustainable development.
- 6.6 Where no local planning policies are directly related to the proposed development, the Council will assess the proposal based on its impacts on the local environment and whether it accords with national planning policies.

### Implementation

- 6.7 The Council will work with applicants to identify solutions to enable development proposals to be approved, and to ensure that proposals improve the environmental, economic and social opportunities of Harlow.

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**STRATEGIC GROWTH STRATEGY FOR HARLOW**  
**7. Housing Strategy and Growth Locations**



## 7. HOUSING STRATEGY AND GROWTH LOCATIONS

### Introduction

- 7.1 The Council's strategy for housing growth during the Local Plan period sets out the amount and location of housing that will be delivered in the district. This includes support for the Harlow and Gilston Garden Town by the allocation of the Strategic Housing Site East of Harlow, forming part of one of the four new Garden Communities, which makes a major contribution towards meeting the housing requirement for Harlow. In addition there are a number of smaller housing allocations in Harlow, which also contribute to the Garden Town vision and Harlow's housing need, and will be required to be delivered in accordance with the Harlow and Gilston Garden Town Vision and Design Guide.
- 7.2 The Housing Strategy seeks to deliver a wide range of housing types including market, affordable and specialist housing to meet future generations' needs. The scale and type of housing needed has been identified in technical studies in accordance with national planning policies and guidance.
- 7.3 The main study, the Strategic Housing Market Assessment (SHMA), calculates the Objectively Assessed Housing Need (OAHN) for the district, including affordable and specialist housing requirement. However, in order to contribute to meeting the district's affordable housing need, provide a critical mass for regeneration and urban renewal, and to help meet the wider needs of the Housing Market Area (HMA), additional housing above the OAHN has been proposed.

### Corporate Priorities

- 7.4 This chapter and the policies contained within it will help deliver the Council's Corporate Priorities, as follows:
- **More and better housing**

### Local Plan Strategic Objectives

- 7.5 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 4 - Identify sites to meet local housing needs both now and in the future**
  - **Objective 5 - Provide a range of suitable housing for the community including a range of tenure and type**
  - **Objective 6 - Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates**
  - **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

# HS1 Housing Delivery

The Local Plan identifies sites to deliver at least 9,200 dwellings during the Local Plan period (1 April 2011 to 31 March 2033).

In view of the lead time for bringing forward the Strategic Housing Site East of Harlow, together with the sites at Newhall and the Princess Alexandra Hospital, this will be provided in accordance with a stepped requirement of 361 dwellings per annum from April 2011 to March 2024 and 501 dwellings per annum from April 2024 to March 2033.

## Justification

- 7.6 The Local Plan must ensure there is a sufficient supply of dwellings to meet Harlow's Objectively Assessed Housing Need (OAHN) of 6,820 dwellings. To contribute to affordable housing need, the regeneration of the district and to help meet the wider needs of the HMA, an additional 2,380 dwellings are proposed, giving a **total requirement of 9,200 dwellings** during the Local Plan period.
- 7.7 As at 31 March 2019, 2,463 dwellings had been completed and there were 4,723 dwelling commitments, leaving a further requirement for 2,014 dwellings. Anticipated sources of supply are shown in Fig. 7.1. The projected surplus over the requirement allows for flexibility, possible slippage of large sites and for some permissions to lapse.

Fig. 7.1: Dwelling supply

Completions at 31 March 2019	2,463
Commitments at 31 March 2019	4,723
Strategic Housing Site East of Harlow	2,600
Policy HS2 sites	834
<b>TOTAL SUPPLY</b>	<b>10,620</b>
Surplus over 9,200 requirement	1,420

- 7.8 National planning policies state there should be a significant increase in the delivery of new homes, with local authorities responsible for establishing the right level of local housing provision in their area, and identifying a long-term supply of housing land based on objectively assessed development needs. This means the Local Plan must establish the level of housing across the area and identify where it will be delivered.
- 7.9 It is important the Local Plan provides homes to meet the aspirations of local people and to attract new people to live and work in the area in order to support the district's regeneration objectives. The Local Plan must also ensure the housing

needs of different types of households are met by providing the right types and mix of housing within the HMA.

- 7.10 A number of factors are considered when establishing the housing requirement in the OAHN: past completion rates, existing commitments, potential housing supply from the Strategic Housing Land Availability Assessment, population and household projections, and aspirations for employment and regeneration.

#### ***Objectively Assessed Housing Need (OAHN)***

- 7.11 The assessment of housing need and the Council's housing strategy in the Local Plan reflects the principles set out in national planning policies and guidance. Various Evidence Base studies, including the Greater Essex Demographic Forecasts and economic evidence, have informed the Strategic Housing Market Assessment (SHMA) and the Harlow Future Prospects Study.

#### ***The Harlow Future Prospects Study: Linking Regeneration and Growth (2013)***

- 7.12 The Harlow Future Prospects Study links significant new development and the regeneration of the district.

#### ***The Greater Essex Demographic Forecasts 2013 – 2037 (Phase 7, May 2015)***

- 7.13 The Greater Essex Demographic Forecasts analyse historic job growth and project the future jobs growth for the HMA and how the job growth may be distributed across the four local authorities.

#### ***Strategic Housing Market Assessment (SHMA) and OAHN***

- 7.14 The SHMA was jointly undertaken between Epping Forest, Harlow, Uttlesford and East Hertfordshire District Councils, as these Councils' housing markets are interlinked to form the functional HMA within which the OAHN, including affordable housing need, is established.

- 7.15 The September 2015 SHMA indicated a need for 46,100 dwellings in the HMA. For Harlow, the OAHN was identified as 5,900 dwellings, including 3,400 affordable dwellings.

- 7.16 An update to the SHMA was produced in August 2016, based on the Office for National Statistics (ONS) 2014 household projections and sub-national population projections. This assessment indicated that the OAHN for the HMA is 54,608 dwellings, an increase of nearly 11% on the 2015 SHMA figure of 46,100 dwellings. This update indicates that the OAHN for Harlow is 7,900 dwellings. The proposed requirement of 9,200 dwellings will meet this need.

- 7.17 A further update in February 2017, based on proposed ONS changes to household projections, indicated a reduction in the OAHN to a need for 50,700 dwellings over the HMA. The update did not differentiate the total to individual Councils as the ONS had not finalised the methodology.

- 7.18 A further review of the SHMA was carried out in July 2017. This concluded that the OAHN for the HMA is 51,700 dwellings over the Local Plan period, an increase of 6,200 dwellings above the household projections, which represents a 14% increase. This includes both market and affordable housing.
- 7.19 The number of dwellings apportioned to Harlow in the 2017 update was 7,409 which equates to 337 dwellings per annum over the Local Plan period. This figure was used as the basis for the OAHN when preparing the Local Plan.
- 7.20 However, in June 2020, the Office for National Statistics published more up to date 2018-based household projections which form the latest available starting point to estimate housing need. Using these lower projections as the starting point but adjusted for longer term migration trends, suppressed household formation and market signals, the 2020 SHMA update indicates the OAHN for the HMA as a whole is 48,915 dwellings and within this 6,820 dwellings for Harlow.

### ***Harlow Strategic Site Assessment***

- 7.21 The Strategic Site Assessment assesses the strategic housing requirements for the HMA in accordance with the provisions of the Duty to Co-operate.
- 7.22 The objectives of the Assessment are to:
- consider and evaluate potential strategic sites in and around Harlow;
  - establish up-to-date direction of travel regarding the acceptability of growth;
  - take account of high-level infrastructure implications of particular sites, and in combination across Harlow;
  - enable officers, Councillors, statutory consultees and land-promoters to understand how the sites perform; and
  - provide outputs capable of forming part of the Evidence Bases for the emerging Local Plans of the authorities.
- 7.23 The Assessment sets out spatial options for the distribution of 46,100 dwellings, identified in the September 2015 SHMA. The consultants who produced the SHMA advised that the latest release of sub-national population projections and household projections could increase the dwelling requirement in the OAHN to 54,600 dwellings for the HMA. The consultants also considered that the transport network would not be able to accommodate the full level of growth.
- 7.24 The preferred spatial option identified in the Assessment indicates that 51,100 dwellings could be accommodated across the HMA. This would represent a lower figure than that based on the latest ONS projections, but would reflect the capacity of the highway network.

### ***Housing Requirement***

- 7.25 The housing requirement for Harlow meets the housing need, as evidenced by the SHMA, and supports the Council's priorities to achieve more and better housing and to regenerate Harlow. To achieve these, the housing requirement for Harlow

has been set at 9,200 dwellings, which includes completions and commitments since 1 April 2011 and sites allocated in the Local Plan.

- 7.26 The requirement is 2,380 above the OAHN identified in the 2020 SHMA update to meet Harlow's affordable housing and regeneration needs, to help meet the wider needs of the HMA, and provides an additional buffer should any allocated sites not come forward within the Local Plan period. It will also fulfil the requirement of national planning policies to boost significantly the supply of housing and improve affordability.

## Implementation

### *Housing Supply*

- 7.27 National planning policies require the Council to identify a supply of specific deliverable<sup>12</sup> sites sufficient to provide five years' worth of housing<sup>13</sup>. In addition, a buffer of 5% should be added to the five-year requirement, or 20% if there has been a significant undersupply of dwellings in the past. Based on the 361 dwellings per annum requirement, 2,888 dwellings should have been completed by March 2019. However, there were 2,463 completions achieved during this period, resulting in a shortfall of 425 dwellings on the requirement. The 2018 Housing Delivery Test showed that Harlow delivered 84% of the necessary dwellings, triggering a 20% buffer. In future, a Delivery Test figure of 85% or more will only trigger a 5% buffer. See Appendix 1 for the current calculation.
- 7.28 National planning policies require a five-year supply of deliverable housing sites on adoption of the Local Plan and subsequently. To ensure that a five-year supply is achieved, a stepped requirement is proposed for the Local Plan period. The need for a stepped requirement arises because a significant number of homes will be delivered on large residential sites at Newhall, the Strategic Housing Site East of Harlow and at the Princess Alexandra Hospital. These will be delivered in the later part of the Local Plan period.
- 7.29 As Harlow is a former New Town with tightly-drawn boundaries and a planned nature, with distinctive Green Wedges which are uniquely important to the district's distinctive green character, there is less scope to deliver housing sites at an early date to fulfil a five-year housing land supply as may be the case in a large district. A requirement of 361 dwellings per annum has, therefore, been identified for the period of 2011/12 to 2023/24.
- 7.30 Using this figure to calculate under-supply from previous years and applying a 20% buffer will deliver an initial six-year supply of deliverable dwellings to comply with

<sup>12</sup> National planning policies state that to be considered deliverable, sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on-site within five years and in particular that the development is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long-term phasing plans.

<sup>13</sup> The responsibility for the delivery of housing lies with housebuilders and not the Council.

national planning policies. From 2024/25 to the end of the Local Plan period, an increased requirement of 501 dwellings per annum has been set to meet the 9,200 dwelling requirement overall (see Appendices 1 and 2 for the supply calculation and anticipated trajectory).

- 7.31 In addition to the need to identify deliverable sites, national planning policies also require the Council to identify a supply of specific developable sites or broad locations for growth for years 6 to 10 of the Local Plan period and, if possible, years 11 to 15. The Strategic Housing Site East of Harlow allocated for 2,600 dwellings in Policy HS3 and the housing sites allocated in Policy HS2 meet the national planning policy requirements for the first five years and the later year periods.
- 7.32 There have been 2,463 dwelling completions since the start of the Local Plan period (1 April 2011). There is planning permission for 4,723 dwellings (as at 31 March 2019) which contributes to the housing supply. The Local Plan is, therefore, required to allocate at least 2,014 dwellings. The housing trajectory (see Appendices 1 and 2) illustrates the expected rate of housing delivery for the Local Plan period.

### *Windfall Sites*

- 7.33 National planning policies state that authorities may make an allowance for windfall sites in the five year supply if there is compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply.
- 7.34 Windfall sites are generally sites which are either below the Call for Sites<sup>14</sup> threshold of six dwellings in the SHLAA, or are larger sites which have not been allocated in the Local Plan. Windfall sites can provide a number of additional unexpected dwellings and can be a useful addition to the housing mix in the district in terms of tenure, price and design.
- 7.35 Whilst there has been a steady supply of windfall sites, their contribution to the housing supply has not been significant. The New Town legacy of Harlow means the district has been carefully planned from the outset; consequently there are very few opportunities for windfall sites. It is considered that the windfall supply in Harlow would not meet the national criteria and consequently has not been included as a reliable source of supply in the five year supply calculations.
- 7.36 Change of use from office to residential by Prior Notification has produced additional housing in the district, although this source of new dwellings should not be considered as windfall as the status may change during the Local Plan period. Evidence shows that the district should retain employment sites which will be required as Harlow's growth aspirations are realised.

<sup>14</sup> The Call for Sites is an invitation to developers to submit sites for assessment in the SHLAA.

## HS2 Housing Allocations

In addition to the Strategic Housing Site East of Harlow (Policy HS3), to meet the housing requirement of 9,200\* dwellings during the Local Plan period, the following sites are allocated.

REF.	LOCATION	DWELLING CAPACITY
1	Princess Alexandra Hospital	550
2	The Stow Service Bays	70
3	Staple Tye Mews, Staple Tye Depot and The Gateway Nursery	30
4	Riddings Lane	35
5	The Evangelical Lutheran Church, Tawneys Road	35
6	Pollard Hatch plus garages and adjacent land	20
7	Coppice Hatch and garages	16
8	Sherards House	15
9	Elm Hatch and public house	13
10	Fishers Hatch	10
11	Slacksbury Hatch and associated garages	10
12	Garage blocks adjacent to Nicholls Tower	10
13	Stewards Farm	10
14	Pypers Hatch	10
	<b>Total Dwellings Allocated</b>	<b>834</b>

\*Dwelling numbers are indicative and sites will be subject to detailed planning to establish their final capacity.

### Justification

7.37 The Local Plan has identified a dwelling requirement of 9,200 during the Local Plan period. There have been 2,463 dwellings completed during the period of 1 April 2011 to 31 March 2019 and an additional 4,723 dwellings have planning permission. This leaves a residual requirement of 2,014 dwellings to be provided.

7.38 The Strategic Housing Site East of Harlow (forming part one of the four new Garden Communities in the Harlow and Gilston Garden Town) will provide 2,600 dwellings in Harlow during the Local Plan period, and the sites allocated in Policy HS2 for 834 dwellings provide a total of 3,434 dwellings. This is 1,420 dwellings more than the residual requirement of 2,014. This overage provides an element of flexibility should some sites not come forward or their capacity is less than expected.

### Implementation

7.39 An Area Action Plan will be prepared for Harlow Town Centre (HTCAAP). The town centre boundary is shown on the Policies Map, reference RS2-1. The HTCAAP will

identify additional dwellings as part of mixed use proposals. These additional dwellings will give increased flexibility to the district's housing land supply.

- 7.40 The Council will work closely with the developers of the allocated sites to encourage sites being brought forward in a timely fashion and in accordance with the Local Plan policies.

## HS3 Strategic Housing Site East of Harlow

A Strategic Housing Site for 2,600 dwellings and associated infrastructure is allocated on land to the east of Harlow. The site forms part of one of the new Garden Communities in the Harlow and Gilston Garden Town.

Developers must produce a Strategic Master Plan in general conformity with the Harlow and Gilston Garden Town Design Guide and in partnership with the Council and other stakeholders, such as Epping Forest District Council, East Hertfordshire District Council, the local community, infrastructure providers and statutory bodies.

The development must:

- (a) provide integrated, well-planned and sustainable development that reflects the overarching design principles of the Harlow and Gilston Garden Town Vision and Design Guide, including the provision of Green Wedges and Green Fingers (incorporating public natural/semi-natural open space) and opportunities to enhance the biodiversity of the area;
- (b) include the provision of Green Wedges and Green Fingers, incorporating public natural/semi-natural open space within the development to link with the existing network of Green Wedges and Green Fingers in the district;
- (c) provide local highway solutions to address the impact on the wider strategic road network (including necessary links to the new Junction 7a on the M11);
- (d) include the provision of direct walk/cycle/bus access and link to the Newhall site as part of the Sustainable Transport Corridor;
- (e) provide footpaths, cycleways and bridleways within the development and link them to the existing Harlow network and adjacent networks in the Epping Forest District;
- (f) provide community infrastructure, including, but not limited to:
  - (i) a new primary school of at least 2.9ha site area;
  - (ii) in addition to any necessary contributions, the provision of land for at least 10ha for a secondary school if required by the Strategic Master Plan;
  - (iii) child care and Early Years provision;
  - (iv) youth services;
  - (v) healthcare facilities;
  - (vi) multi-purpose community space and facilities;
  - (vii) allotment provision;
  - (viii) indoor and outdoor sports facilities, which may be shared-use;
  - (ix) neighbourhood equipped areas for play and locally equipped areas for play.
- (g) provide appropriate local retail facilities, similar to Neighbourhood Centres

- (incorporating an element of employment use) and Hatches elsewhere in Harlow;
- (h) a Heritage Impact Assessment will be required to inform the design of the Garden Town Community to ensure heritage assets within and surrounding the site are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design as identified through the Heritage Impact Assessment;
  - (i) be designed sensitively to take full account of topography and landform;
  - (j) provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment;
  - (k) provide satisfactory water supply and waste water network infrastructure for occupants;
  - (l) provide and contribute to public art within the development; and
  - (m) include any measures necessary to safeguard wildlife sites beyond the district boundary in accordance with Policy WE4.

Infrastructure, including social infrastructure, must be delivered at a pace which meets the needs of the proposed development throughout the construction of the site.

Any application for development on the site in the form of individual or part/phased development should be in general conformity with a Strategic Master Plan which has been endorsed by the Council as well as the Harlow and Gilston Garden Town Design Guide.

Developers will be expected to make a fair and reasonable contribution to the strategic highway and other infrastructure requirements set out in the Infrastructure Delivery Plan.

## Justification

7.41 The Strategic Housing Site East of Harlow was identified as part of a joint study (the Harlow Strategic Sites Assessment, 2016) with the HMA districts. The site forms part of one of the four new Harlow and Gilston Garden Town Communities, and provides the opportunity to deliver regeneration objectives whilst also addressing housing needs.

7.42 The four Harlow and Gilston Garden Town Communities are:

- South of Harlow (Latton Priory), within the Epping Forest district;
- West of Harlow (Water Lane Area), within the Epping Forest district;
- East of Harlow, partly within the Harlow district and partly within the Epping Forest district; and
- Gilston Area, within the East Hertfordshire district.

7.43 The Strategic Housing Site East of Harlow has a potential capacity for around 2,600 dwellings, built during the Local Plan period, and would include the infrastructure necessary to support this number of dwellings, such as schools, shops and open spaces.

- 7.44 The joint study evaluated potential sites around Harlow and included this site within the district. The study provides a robust evidence base, which is consistent in its approach to all the potential sites.
- 7.45 The Strategic Housing Site East of Harlow is fundamental to the delivery of the Local Plan and for delivering the vision for Harlow. Without this site, there would be insufficient developable land in Harlow to deliver the required level of growth to meet housing needs and the regeneration of the district.
- 7.46 The scale and nature of the site means that a number of infrastructure and statutory requirements should be met on the site for the benefit of residents, and off-site to mitigate the impacts of the development.

## Implementation

- 7.47 Given the importance and scale of the Strategic Housing Site East of Harlow in delivering the Garden Town Communities, development proposals will be required to accord with Policy HGT1.
- 7.48 As a former New Town, Harlow has been carefully planned from the outset, so that most land has a recognised function, for example the Green Wedges, housing and employment areas. As required by national planning policies, the Council has undertaken a Strategic Land Availability Assessment to identify developable sites that are suitable and achievable. This has informed the identification of sites in Policy HS2 for housing development. These sites alone do not meet the district's housing requirements, or leave an allowance for sites which may not come forward in the Local Plan period. The Strategic Housing Site East of Harlow has therefore been identified which will provide a significant number of new homes over the Local Plan period and will meet the district's housing needs.
- 7.49 Developers will be required to produce a Strategic Master Plan in general conformity with the Harlow and Gilston Garden Town Design Guide and in partnership with the Council and other stakeholders, such as Epping Forest District Council, East Hertfordshire District Council, the local community, infrastructure providers and statutory bodies.
- 7.50 The Strategic Housing Site East of Harlow forms part of a wider Garden Town Community, the northern part of which has been proposed for allocation in the emerging Epping Forest District Local Plan for 750 dwellings, which will be subject to the preparation of a Strategic Master Plan. With regards to part e(ii) of Policy HS3, if the Strategic Master Plan indicates that the secondary school is not required within the Harlow district part of the site, then consideration will be given to appropriate alternative development and associated infrastructure having regard to the policies in the Local Plan, and the balance of uses within the Strategic Site as a whole.

## HS4 Gypsies and Travellers

To fulfil the need for nine pitches for the Travelling Community in Harlow, 12 pitches at Fern Hill Lane site will be restored.

Applications for additional pitches over the remainder of the Local Plan period will be assessed for suitability using criteria in Policy H10.

### Justification

- 7.51 National planning policy for traveller sites<sup>15</sup> requires Councils to identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against locally agreed targets. In addition a supply of developable sites for years 6 to 10 of the Local Plan period and, if possible, years 11 to 15, should be identified.
- 7.52 An assessment of needs for Gypsies, Travellers and Travelling Showpeople across Essex for individual districts was updated<sup>16</sup> to take into account the national policy for traveller sites, including specifically a revised definition of a traveller. The key change that was made in this legislation was the removal of the term "persons...who have ceased to travel permanently", meaning that those who have ceased to travel permanently will not now fall under the planning definition of a traveller for the purposes of assessing accommodation need. Consequently their housing requirements could be included as part of the general Objectively Assessed Housing Need (OAHN) and not as a pitch requirement.
- 7.53 Harlow has two existing traveller sites, owned and maintained by Essex County Council: one at Elizabeth Way which contains 21 pitches and is fully occupied; and one at Fern Hill Lane which, at full capacity, could accommodate 25 pitches. Only 15 pitches are currently in use at the Fern Hill Lane site and Harlow Council has agreed to jointly fund the refurbishment of 12 of those pitches with Essex County Council.
- 7.54 The updated assessment for Gypsy and Traveller needs, 2016 to 2033, indicated that there were no households identified as travellers, as defined by the revised national policy. The potential future needs have to be established for both non-travelling households and those whose status has not been possible to identify (unknowns).
- 7.55 It is projected that seven additional pitches are required to meet the future pitch needs of non-travelling households. Where it has not been possible to establish the status of 'unknown' traveller households, there has been a further projected

<sup>15</sup> MHCLG, August 2015. *Planning policy for traveller sites.*

<sup>16</sup> *Essex, Southend-on-Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment.*

requirement of two pitches. Consequently there is a future need of nine pitches in the district for the remainder of the Local Plan period.

- 7.56 There is no identified requirement to meet the needs of non-travelling households in Harlow during the remainder of the Local Plan period. However, it is considered that provision should be addressed though additional traveller pitches for both the emerging 'unknown' households and non-travelling households, because it is likely that these households would require appropriate housing.

### Implementation

- 7.57 At Fern Hill Lane, an additional 12 pitches are being provided. As 9 pitches are required to meet Gypsy and Traveller need, the Local Plan requirement has been met. There are three additional pitches to meet provision beyond the Local Plan period.
- 7.58 The Council will continue to review the requirement for Gypsy and Traveller accommodation during the Local Plan period. Any planning applications for Gypsy and Traveller accommodation will be assessed using Policy H10.

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**STRATEGIC GROWTH STRATEGY FOR HARLOW**

## **8. Economic Development and Prosperity Strategy**



**Harlow Local Development Plan**

## 8. ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY

### Introduction

- 8.1 The Economic Development and Prosperity strategy reflects the changing nature of the district's economy building upon the growth of key sectors and recognising that Harlow is becoming a destination for world class knowledge based businesses. The strategy identifies suitable land for the delivery of new employment land and supports the delivery of committed land at the Enterprise Zone, Public Health England and its Science Campus. The strategy acknowledges the contribution that Harlow Town Centre will make towards job provision in the district, this being set out in the Town Centre Area Action Plan and will look to develop a visitor economy for the district.
- 8.2 The existing employment areas will continue to make a significant contribution towards employment needs in Harlow and will be maintained and enhanced. The strategy recognises the importance of providing grow-on space for business expansion. Most importantly, the Economic Development and Prosperity strategy for Harlow aims to improve the skills levels of its residents to align with business needs and to close the gap between workplace and resident earnings.

### Corporate Priorities

- 8.3 This chapter and the policies contained within it will help deliver the Council's Corporate Priorities, as follows:
- **Regeneration and a thriving economy**
  - **Wellbeing and social inclusion**
  - **Successful children and young people**

### Local Plan Strategic Objectives

- 8.4 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 7 - Meet the employment needs of the district by diversifying and investing in the district's employment base**
  - **Objective 8 - Secure economic revitalisation and reinforce Harlow's reputation as a key centre for Research and Development**
  - **Objective 9 - Improve educational opportunities and the skills base of local residents**
  - **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

## ED1 Future Employment Land

To reflect the Economic Development and Prosperity Strategy for Harlow and the sub-regional service role of the Harlow and Gilston Garden Town, up to 18.8ha of B1 (a, b and c) uses are allocated at Harlow Business Park at The Pinnacles and at the Harlow Enterprise Zone at London Road.

Proposals for non-B1 use on these sites will require strong justification.

A further 2.2ha of land is allocated for employment uses (B1a, B1b, B1c, B2 and B8) at Templefields.

These employment sites are allocated on the Policies Map with the following reference numbers.

REF	LOCATION	CAPACITY (Ha)
ED1-1	Harlow Business Park, The Pinnacles	4.6ha
ED1-2	London Road	14.2ha
ED1-3	East Road, Templefields	2.2ha
	<b>TOTAL EMPLOYMENT PROVISION</b>	<b>21ha</b>

Opportunities for office floorspace in Harlow Town Centre will be identified through the Harlow Town Centre Area Action Plan.

### Justification

#### *Harlow's Functional Economic Market Area (FEMA)*

- 8.5 Harlow is set in a unique position with excellent strategic transport links to economic opportunities in London to the south, Cambridge to the north and international destinations via Stansted Airport. This places the Harlow and Gilston Garden Town centrally between a leading world city and one of the highest ranking universities.
- 8.6 Harlow has a strong commuting pattern with parts of West Essex and East Hertfordshire but also clear commuting links with Cambridge and London<sup>17</sup>. The FEMA for Harlow is therefore broadly based around the Housing Market Area (HMA) which includes Uttlesford, East Hertfordshire and Epping Forest.
- 8.7 Harlow is an important destination for employees in the FEMA, providing jobs in a range of occupations. The district is fast becoming an attractor for Life Science and MedTech, advanced manufacturing, ICT and digital industries. The delivery of Harlow Enterprise Zone, the relocation of Public Health England and the possible relocation and expansion of Princess Alexandra Hospital will strengthen these

<sup>17</sup> Office for National Statistics, 2011 Census.

growth sectors. London Road, which forms part of the Enterprise Zone, has been specifically identified to facilitate the Research and Development sector of the local economy. Warehouse and general industrial uses on this site will, therefore, require strong justification.

- 8.8 The Government's decision to support Garden Town status for the Harlow and Gilston area, delivering in excess of 16,000 homes, has placed an even greater emphasis on the ability of Harlow to deliver space for quality businesses and employment. The Garden Town will look to satisfy a more strategic demand for growth sectors, building on Harlow's historic and current economic strengths.
- 8.9 The London Stansted Cambridge Consortium (LSCC) further supports Harlow Enterprise Zone as an important opportunity site for growth sectors in the corridor and identifies the district, and therefore Harlow and Gilston Garden Town, as being a strategically important destination for jobs, particularly high-skilled jobs. The LSCC also endorses the regeneration of Harlow Town Centre and supports the requirement for major improvements to the transport network including Junction 7a on the M11 and the four-tracking of the West Anglia Mainline.

#### *Assessment of Employment Needs*

- 8.10 Evidence was prepared jointly across the FEMA to identify employment needs and floorspace requirements for the area as a whole and for individual districts. The evidence used employment projections from the East of England Forecasting Model, population growth as stipulated in the SHMA and local evidence to identify an overall floorspace requirement. This concluded that 10 to 24ha of office land (B1a) and 68ha of industrial land (B1b, B1c, B2 and B8) should be planned for during the period of 2016 to 2033.
- 8.11 For Harlow, the evidence identified the need to plan for a further 2 to 4ha of office land (B1a) and 16ha of industrial land (B1b, B1c, B2 and B8) between 2016 and 2033. The Local Plan has identified sufficient land to meet this requirement through the delivery of the Enterprise Zone and through undeveloped sites at Templefields and The Pinnacles. These sites, along with the Enterprise Zone, have been identified for B1 uses in order to develop the Economic and Prosperity Strategy for Harlow and to reflect the Harlow Economic Development Strategy 2017 to satisfy the strategic demand for growth sectors in the Garden Town. These sites will also assist in delivering a mix of unit sizes for medium and large businesses, small workspaces for start-ups and provide opportunities for grow-on space.
- 8.12 New jobs will be created in other sectors in Harlow, including through the regeneration of the Town Centre which is already a large provider of retail-based jobs and where regeneration opportunities are being sought through the Harlow Town Centre Area Action Plan. Princess Alexandra Hospital is a major job provider in the district and its expansion will be supported. This is set out in further detail in the Strategic Infrastructure chapter.

## Implementation

- 8.13 The Council will work with a number of bodies to implement the Economic and Prosperity strategy outlined above. It is imperative that, in order to attract businesses and investment to the district, Harlow has a workforce in place to fill new jobs, provided through new dwellings and working age residents. This workforce must have the right skills and education to support those jobs and a sustainable infrastructure network that enables employees to access job opportunities and enable businesses to function properly. This includes, for example, working with schools, Harlow College and local employers to improve skills; working with infrastructure providers to bring forward projects such as Junction 7a and four-tracking of the West Anglia Mainline; bringing forward digital infrastructure for smart enablement across the district; and working with local businesses to identify their future needs.
- 8.14 The Council will work closely with the LSCC who has developed a vision for the core area of Harlow, Epping Forest, East Hertfordshire, Uttlesford and Broxbourne. This area has been identified as one of the most important and fastest growing economic regions. The Council will also work closely with the South East Local Enterprise Partnership and the West Essex Alliance.
- 8.15 The Local Plan reinforces the Economic and Prosperity Development strategy by encouraging new employment development in strategic employment areas and protecting existing floorspace.

## ED2 Protecting Existing Employment Areas

Existing Employment Areas at The Pinnacles, Templefields, Burnt Mill, Staple Tye, Bush Fair and Church Langley will be retained and enhanced for a mix of office, industrial and warehouse uses and other associated activities in accordance with Policy PR1.

The Enterprise Zone at London Road will facilitate the Research and Development Sector and other associated activities. Employment uses which are not related to the Research and Development sector will, therefore, require strong justification.

Grow-on space will be supported on existing Employment Areas and on future employment sites identified at The Pinnacles (ED1-1) and Templefields (ED1-3).

Neighbourhood Service Areas at The Stow, Bush Fair and Staple Tye will be protected in accordance with Policy PR2 and the provision of smaller start-up units, shared spaces and workhubs in these areas will be encouraged.

In all the above cases, developers will be expected to work with broadband service providers to ensure that the provision of future proofed high speed broadband infrastructure is available to occupiers and this should be by fibre connection wherever possible.

## Justification

- 8.16 The district's existing Employment Areas and Neighbourhood Service Areas, as set out in this policy and shown on the Policies Map, continue to make an important contribution to employment provision and will be protected. To ensure they continue to attract investment, retain employment uses and draw in a variety of local and national businesses, the Council is seeking to bring forward regeneration plans for the north-eastern part of Templefields as part of the Enterprise Zone and improve connectivity to The Pinnacles. The Council will continue to implement the Master Plan for London Road. In respect of London Road North, this policy will ensure that the site continues to deliver Research and Development uses to support the overall economic development strategy for Harlow. The Local Development Order for London Road North lists development uses permitted on the site. Other uses will require strong justification.
- 8.17 Harlow has a large proportion of small businesses with less than 10 employees, this being slightly lower than the East of England average. Harlow does, however, have more medium to large businesses than the UK and East of England average<sup>18</sup>. This business structure suggests a need for a mix of both small workspaces to capture start-ups, and medium to large units to accommodate expansion and scaling up of a growing business and follow-on space as they become established. It is, therefore, important that the district continues to support the Neighbourhood Service Areas which provide space for start-up businesses, shared spaces and future opportunities for workhubs as well as seek opportunities for future grow-on space for larger businesses.
- 8.18 To continue to support existing knowledge-based industries, and to promote the development of new ones such as creative industries, high speed broadband is, therefore essential. Policy ED2, along with Policy IN4, aims to improve and secure the delivery of high speed broadband infrastructure.

## Implementation

- 8.19 The Local Plan ensures that the strategic employment sites continue to provide a mix of B1, B2 and B8 uses and protects the sites from alternative uses unless exceptional circumstances arise. It also protects Neighbourhood Service Areas and supports the provision of smaller units at these sites by discouraging warehousing and industrial uses and amalgamation of units.
- 8.20 The Council has prepared Article 4 Directions to protect employment uses from conversion.
- 8.21 When submitting an application, developers for new Employment Areas will be expected to provide information to demonstrate how they have sought to secure high speed broadband provision as part of their proposals

<sup>18</sup> Office for National Statistics, 2015. *NOMIS Official Labour Market Statistics*.

## ED3 Developing a Skills Strategy for Harlow

A Skills Strategy which improves the skills and education attainment of Harlow residents will be prepared and delivered in partnership with existing and new businesses, Harlow College and University Centre and other partners including the education authority and Education and Skills Funding Agency.

### Justification

- 8.22 Improving skills levels and education attainment is imperative to improving the lives of residents by increasing living standards through higher wages. It is also important in supporting the resident workforce and retaining and attracting businesses which focus on particular growth sectors.
- 8.23 The Skills Strategy will ensure that economic prosperity in Harlow's businesses translates to local residents and the local community.

### Implementation

- 8.24 The Council has prepared an Economic Development Strategy for Harlow which identifies projects and schemes to help improve skills levels across the district. This includes establishing Workforce Development Plans with large employers, and working with education providers and the Education and Skills Funding Agency to ensure education and training matches need and to explore and promote opportunities that encourage the workforce into particular growth sectors.
- 8.25 A joint venture between Harlow College and Anglia Ruskin University has already helped to provide additional degrees and foundation degrees at the College including those related to business management, bioscience, engineering, graphic design and journalism.
- 8.26 The Local Plan supports the employment of local people, work related training and education opportunities in major developments. This will be secured through planning obligations on both commercial and residential proposals.

*Chapter continues on next page.*

## ED4 Developing a Visitor Economy

A visitor economy will be developed, building upon the district's arts and cultural attractions, the 'Sculpture Town' status, the New Town heritage and natural features such as the River Stort.

Proposals which enhance Harlow's visitor economy will be supported where they are of a scale, type and appearance appropriate to the locality, provide local economic benefits and are underpinned by appropriate infrastructure.

### Justification

- 8.27 Harlow has an opportunity to grow and develop its visitor economy, given its strategic position and network links to London and Cambridge, its proximity to Stansted Airport, its New Town heritage and its important collection of public sculpture. The district already hosts a number of facilities which contribute towards this strategy and a sub-regional Town Centre which will continue to provide commercial leisure and night-time activities.
- 8.28 Developing a visitor economy has multiple benefits that will contribute towards the economic and social wellbeing of local communities. It can regenerate areas, provide employment for local residents, provide business for SMEs and catalyse growth. The London Stansted Cambridge Consortium (LSCC) vision for the Core Area, as set out in the Context, Vision and Objectives chapter, recognises tourism as being a strong economic sector in the area. It makes reference to recreation and green assets, such as the River Stort, being a contributor towards this.

### Implementation

- 8.29 The Harlow Town Centre Area Action Plan will investigate opportunities to provide leisure and entertainment facilities in order to develop both a day-time and night-time economy in the town centre. This will help in attracting visitors to the district and potentially be a magnet for complementary facilities including hotels and over-night accommodation.
- 8.30 Improving Green Infrastructure links will help connect users of the River Stort to the Lee Valley Regional Park, to Epping Forest and north through to Hatfield Forest. It is anticipated that this will bring visitors from the wider region and improve water-based facilities along the River Stort.
- 8.31 The Local Plan protects existing cultural, community and sporting facilities which bring visitors into the town, and seeks to provide public art through major development.



**STRATEGIC GROWTH STRATEGY FOR HARLOW**

**9. Retail Ambitions and  
Town Centre Redevelopment**



## 9. RETAIL AMBITIONS AND TOWN CENTRE REDEVELOPMENT

### Introduction

- 9.1 Harlow provides important retail services for both local residents and a wider catchment including parts of Essex and Hertfordshire. The district's network of centres provide a broad range of day-to-day retail needs, a variety of community and leisure facilities and an important source of employment for Harlow. The protection and enhancement of these centres is therefore crucial, and the redevelopment and regeneration of the town centre is vital in supporting the overall sustainability and future vitality of the Harlow and Gilston Garden Town.
- 9.2 Given the strategic importance of Harlow Town Centre in the wider sub-region, a separate Area Action Plan is being prepared. This will identify proposals for delivering additional comparison and convenience floorspace through redevelopment opportunities, an improved night-time offer through better commercial-leisure facilities, the capacity of the town centre to provide new homes and offices and an enhanced public realm. Policies have also been developed which preserve the retail hierarchy in Harlow, protect existing retail provision in the district and deliver small-scale retail facilities in new settlements consistent with the original Master Plan for Harlow New Town.

### Corporate Priorities

- 9.3 This chapter and the policies contained within it will help deliver the Council's Corporate Policies, as follows:
- **Regeneration and a thriving economy**
  - **Wellbeing and social inclusion**
  - **Successful children and young people**

### Local Plan Strategic Objectives

- 9.4 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 10 - Provide a range of shopping needs for local residents and the wider sub-region by regenerating the Town Centre and protecting and enhancing Neighbourhood Centres and Hatches**
  - **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

# RS1 Retail Hierarchy

Retail development must be directed to Harlow Town Centre first, followed by the centres set out in the retail hierarchy below.

	POSITION IN RETAIL HIERARCHY	RETAIL CENTRE
<b>TOP</b>  <b>BOTTOM</b>	<b>Town Centre</b>	Harlow Town Centre
	<b>Neighbourhood Centres</b>	Bush Fair      The Stow Old Harlow      Church Langley Staple Tye
	<b>Hatches</b>	Burgoyne      Maunds Crawley      Mill Clifton      Prentice Place Colt      Pollards Coppice      Pypers Elm      Sherards Fishers      Slacksbury Katherines      Sumners Manor      Ward
	<b>Out-of-Centre Retail Parks</b> (on Edinburgh Way)	Queensgate Centre      The Oaks St James Centre      Princes Gate Harlow Retail Park

Harlow’s Retail Centres are identified on the Policies Map.

## Justification

9.5 The retail hierarchy reflects the role and function of the district’s retail centres. Harlow Town Centre is positioned first in the hierarchy signifying its importance in providing retail facilities for the district and the sub-region. The Neighbourhood Centres are identified as being secondary to the town centre as they provide for local retail facilities for individual settlements. Hatches serve specific local needs and provide for a range of community services. Out-of-Centre Retail Parks have been identified at the bottom of the hierarchy. The hierarchy will ensure that retail development is directed to the town centre first to maintain its role and function as a sub-regional centre and ensure the future vitality of the Harlow and Gilston Garden Town.

## Implementation

9.6 Retail development should be directed to Harlow Town Centre in the first instance followed by the retail centres set out in the retail hierarchy. The sequential test for Main Town Centre Uses is set out in the Development Management policies.

## RS2 Future Retail Floorspace

There is an identified need to provide up to 18,100sqm of comparison floorspace and up to 3,200sqm of convenience floorspace in Harlow up to 2026.

In order to plan for residential development coming forward in the Harlow and Gilston Garden Town beyond this period, an indicative requirement for up to 40,200sqm of comparison floorspace and up to 5,500sqm of convenience floorspace has been identified.

A Town Centre Area Action Plan (HTCAAP) will be prepared for Harlow Town Centre. The town centre boundary is shown on the Policies Map, reference RS2-1.

The HTCAAP will look to deliver a significant proportion of the retail floorspace requirements through site redevelopment and regeneration opportunities, and will identify the future retail floorspace capacity of the town centre.

The HTCAAP will also identify environmental and public realm improvements, access and infrastructure schemes, and opportunities for providing a broader range of uses in the town centre including community, leisure, commercial and residential uses.

The remaining floorspace requirement will be delivered through redevelopment opportunities in the district's Neighbourhood Centres and Hatches.

New retail centres which provide a mix of retail facilities and community services will be delivered in new settlements. They must be well connected and within walking distance for the residents of that development.

### Justification

9.7 The Retail and Leisure Needs Study identified future retail floorspace needs for the district based on housing growth coming forward in the Harlow and Gilston Garden Town. The Study recommends floorspace requirements for both convenience and comparison facilities up to 2026 where housing development is more defined and an indicative requirement post 2026. A review may be required to understand the exact housing growth coming forward in the Harlow and Gilston Garden Town and therefore further retail floorspace requirements beyond this period.

9.8 The Study suggests that the majority of retail growth should be directed to the town centre, particularly to the north of the town centre with the largest proportion of remaining growth directed to other town centre sites. This corresponds with the Retail Hierarchy and will ensure that the town centre can provide the facilities and services for the population of the Garden Town. The Neighbourhood Centres will accommodate a proportion of the identified floorspace requirements, albeit small, in order to maintain their role and function as a provider of day-to-day services.

9.9 An Area Action Plan for Harlow Town Centre is to be prepared to identify the most suitable and sustainable locations for retail facilities, and set out the capacity of the

town centre to deliver retail floorspace provision. The population growth generated through the Harlow and Gilston Garden Town will encourage investment and stimulate regeneration in Harlow Town Centre and will support the case for new retailers to locate to Harlow.

- 9.10 The Harlow Future Prospects Study stated that a town of 110,000 residents would be able to support a night-time economy and comparator towns of this size can attract department stores. The HTCAAP will investigate options and opportunities for providing such uses.
- 9.11 It is important that new housing within the Harlow and Gilston Garden Town is well-served by local retail and community facilities. The provision of Hatches or Neighbourhood Centres which provide for day-to-day needs must be well connected and within walking distance of the residents of that related neighbourhood area or accessible by public transport. This conforms to Sir Frederick Gibberd's principles of sustainable neighbourhoods in the original master plan for Harlow.

## Implementation

- 9.12 An Area Action Plan is being prepared for Harlow Town Centre in conformity with the Council's Statement of Community Involvement, working closely with landowners, traders, businesses and other relevant stakeholders. The HTCAAP will identify sites and opportunities for providing new retail floorspace requirements through regeneration and redevelopment and new commercial leisure floorspace. The HTCAAP will also look to improve the public realm of the town centre, access to, from and within the centre and opportunities for community facilities.
- 9.13 The boundary for Harlow Town Centre has been expanded to include Sainsbury's to the north and Harlow College and Harlow Leisurezone to the east. This wider boundary change encourages greater emphasis on the potential regeneration opportunities of sites beyond the immediate core area of the town centre. By including them there is potential to encourage a more joined up approach. The boundary change will also assist in achieving a comprehensive context for movement and public realm projects as it includes the main transport network around the town centre.
- 9.14 The Development Management policies further strengthen the roles of the district's retail centres by applying a sequential approach to new retail provision in the district.
- 9.15 New retail facilities have been identified as part of the Strategic Housing Site East of Harlow, serving the catchment of the new development.

## RS3 Protecting and Enhancing Existing Retail Centres

Retail floorspace which contributes towards the viability, vitality and function of Harlow Town Centre will be protected, subject to the outcomes of the Harlow Town Centre Area Action Plan.

The role and function of the district's Neighbourhood Centres will be protected and enhanced. Support will be given in principle to:

- (a) new retail and community uses that are of an appropriate scale to the role and function of the Neighbourhood Centre; and
- (b) residential development which supports the main Neighbourhood Centre uses.

Development opportunities and improvement schemes identified in The Stow, reference RS3-1 on the Policies Map, will be supported in accordance with The Stow Design Framework Supplementary Planning Document (SPD). The Council will consider the preparation of a SPD for Bush Fair Neighbourhood Centre.

The district's Hatches will be retained for a mix of local services and facilities. Hatches identified as housing allocations will be redeveloped for a mix of retail, residential and community uses to enable their improvement and regeneration.

The role and function of the district's Retail Parks as a provider of bulky retail goods will be protected.

### Justification

- 9.16 The existing retail centres and retail floorspace in Harlow make an important contribution towards the retail needs of the district. This policy aims to protect this floorspace but outlines where exceptions may be acceptable.
- 9.17 Opportunities may be identified through the Harlow Town Centre Area Action Plan where the loss of retail use to facilitate alternative uses or regeneration may be acceptable. Alternative uses might include commercial-leisure, residential and office uses or where the loss of retail may facilitate a better quality public realm. The overall purpose of the HTCAAP is to provide new retail floorspace requirements in accordance with the needs assessment and this will be taken into consideration where any retail loss is proposed.
- 9.18 The district's Neighbourhood Centres provide a range of retail facilities and community services for residents and also make an important contribution towards residential and employment provision.
- 9.19 The district has 18 Hatches which are small in nature and mostly provide convenience facilities such as newsagents and small supermarkets. There are opportunities to regenerate and improve several of the Hatches through redevelopment. This would include the provision of other community uses and residential use which create vibrant and active centres. Policy HS2 allocates sites for

housing, including Hatches identified for mixed use redevelopment. These Hatches are also listed in Fig. 9.1 and identified on the Policies Map.

Fig. 9.1: List of Hatches identified for mixed use including housing

REF.	LOCATION	DWELLINGS CAPACITY*
HS2-6	Pollard Hatch plus garages and adjacent land	20
HS2-7	Coppice Hatch and garages	16
HS2-9	Elm Hatch and public house	13
HS2-10	Fishers Hatch	10
HS2-11	Slacksbury Hatch and associated garages	10
HS2-14	Pypers Hatch	10

\*Dwelling numbers are indicative and sites will be subject to detailed planning to establish their final capacity.

9.20 The district's Retail Parks are an important retail destination for a wide catchment area and provide large units for bulky A1 goods such as furniture and electrical items. Protecting the unique role and function of the Retail Parks is important but managing the nature and scale of the facilities in these locations is equally important. This policy will ensure they do not provide direct competition with the town centre. The Development Management policies also manage this by ensuring the sequential approach is satisfied for any retail proposals in the Retail Parks and limits the type and scale of retail uses.

## Implementation

9.21 The Harlow Town Centre Area Action Plan and The Stow Design Framework SPD identify areas where retail will be protected and enhanced and areas where alternative uses will be considered acceptable. The Council will also consider preparing an SPD for Bush Fair Neighbourhood Centre and action plans for both Bush Fair and The Stow in order to monitor the delivery of development proposals and schemes identified in these documents.

9.22 The Development Management policies continue to protect primary frontages in the Town Centre and Neighbourhood Centres for retail uses, but will support alternative uses in secondary frontages and on the first floor, where acceptable. Protecting frontages will assist in ensuring the critical mass of retail floorspace is provided, this being key to driving footfall and visitor numbers.

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**STRATEGIC GROWTH STRATEGY FOR HARLOW**  
**10. Linking Development Sites to the**  
**Wider Environment**



## 10. LINKING DEVELOPMENT SITES TO THE WIDER ENVIRONMENT

### Introduction

- 10.1 Harlow has a unique natural environment, including the network of Green Wedges and Green Fingers, which are important to retain and enhance for the enjoyment of residents and visitors. Additionally, the built environment of Harlow has a built form and design which is unique to Harlow and reflects its New Town heritage.
- 10.2 As such, new developments must continue to implement the natural and built environment principles that have been established in Harlow since it was planned by Sir Frederick Gibberd in the 1940s.

### Corporate Priorities

- 10.3 This chapter and the policies contained within it will help deliver the Council's Corporate Priorities, as follows:
- **Regeneration and a thriving economy**
  - **Wellbeing and social inclusion**
  - **A clean and green environment**

### Local Plan Strategic Objectives

- 10.4 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 1 - Create and enhance high quality built environments which are well connected to revitalised green spaces**
  - **Objective 2 - Deliver high quality design through new development whilst protecting and enhancing the district's historic environment**
  - **Objective 3 - Adapt to and mitigate the impacts of climate change**
  - **Objective 6 - Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates**
  - **Objective 11 - Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**
  - **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

## WE1 Strategic Green Infrastructure

The Strategic Green Infrastructure in Harlow includes the Green Belt, Green Wedges and Green Fingers which are identified on the Policies Map and will be protected and enhanced.

Other Open Spaces, landscaping, trees and hedgerows which contribute to the Green Infrastructure will also be protected and enhanced.

New Green Infrastructure must be planned into new development and, where possible, linked to existing Green Infrastructure.

The new linear 'Stort Riverpark', connecting the Lee Valley Regional Park to Bishop's Stortford through Harlow, will be delivered by contributions from new development.

### Justification

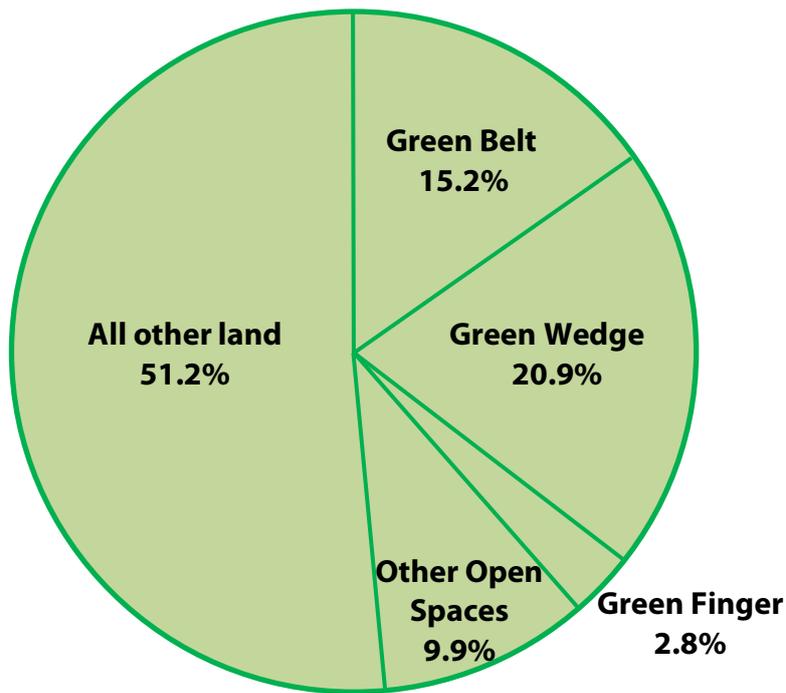
- 10.5 Much of the Green Infrastructure in Harlow is a legacy of Sir Frederick Gibberd's original master plan and provides the overarching and distinctive green character of the district.
- 10.6 The different types of Green Infrastructure in Harlow perform different roles and functions, including, on a strategic scale, linking Harlow's urban area to the wider countryside and preventing unrestricted sprawl of the district.
- 10.7 On a smaller scale, Green Infrastructure provides a range of identifiable economic, social and environmental benefits, such as improving people's health by providing opportunities for formal and informal outdoor activities, reducing air pollution, mitigating against climate change, enhancing and preserving biodiversity, and making places more attractive both for residents and future investors.
- 10.8 Harlow's tight administrative boundary and the lack of unconstrained land in the district means the Objectively Assessed Housing Need (OAHN) could not be met without assessing all options. Green Belt and Green Wedge Reviews were therefore undertaken to inform a decision as to whether exceptional circumstances existed such that land could be removed from those designations for housing. These reviews identified limited areas of the Green Belt and Green Wedges that did not fulfil their respective criteria. Where appropriate, these areas have been released from their designation and, where appropriate, re-designated as either Green Wedge or Green Finger.
- 10.9 Given the level of housing need, it was decided that exceptional circumstances for Green Belt release existed to the east of Harlow, and this land was therefore released in order to meet the OAHN. This land is allocated as the district's Strategic Housing Site. The existing Green Wedge will be extended to run eastwards through the site.

- 10.10 A new Green Finger has been designated along the western boundary of the Gildea Park housing site, extending eastwards to include the linear park through the housing site, and extending westwards to include the informal open space to the east of Old Road.
- 10.11 In addition to the release of the land for the Strategic Housing Site East of Harlow from the Green Belt, further minor changes to the Green Belt boundaries have been made to take account of:
- (a) the proposed Garden Town Community in the Epping Forest district west of Harlow;
  - (b) existing development in the Green Belt; and
  - (c) to establish stronger, more clearly defined boundaries following physical features on the ground.
- 10.12 These changes all accord with national planning policies, including meeting the exceptional circumstances required for changing Green Belt boundaries.
- 10.13 In accordance with national planning policies, the new Green Belt boundaries are stronger and more defensible. The amendments have resulted in a stronger network of Green Belt, Green Wedges and Green Fingers. This is important as previous Local Plan consultations have provided evidence that the Green Infrastructure in the district, in particular the Green Wedges and Green Fingers, are highly valued and well-used by local residents and visitors for a range of formal and informal activities.
- 10.14 It is important, therefore, that this network is protected and that new Green Infrastructure is included in new development, preferably linking with the existing Green Infrastructure network, supported by viable management and maintenance plans which include funding for the ongoing maintenance of new Green Infrastructure.

## Implementation

- 10.15 Green Infrastructure is multi-functional green space, both urban and rural, which is of public value as it offers a wide range of environmental and quality-of-life benefits for local communities, including opportunities for sport and recreation. Green Infrastructure also includes rivers, canals and other bodies of water, as well as non-accessible green spaces which provide visual amenity. As Green Infrastructure is multi-functional, it should not be treated as an alternative description for green space.
- 10.16 At a strategic scale, the Green Infrastructure network in Harlow includes the Green Belt, Green Wedges, Green Fingers, Other Open Spaces and the River Stort. At a smaller scale, it includes trees, hedgerows, ponds, streams and landscaping in developments, such as green roofs or green walls. Fig. 10.1 sets out the land use types in Harlow, highlighting the proportions of the different types of Green Infrastructure.

Fig. 10.1: Land use types in Harlow\*



\*Approximate figures. 'All other land' includes built development and residential gardens.

- 10.17 Green Infrastructure is protected from inappropriate development and, where possible, enhanced.
- 10.18 In order to assist delivering the Garden Town principles in developments in the Harlow and Gilston Garden Town, new Strategic Green Infrastructure must be included within Master Plans for such development and it must link with existing Green Infrastructure in Harlow, for example the Green Wedges. One such opportunity is the extension of Harlow's existing Green Wedge network through the Strategic Housing Site East of Harlow to maintain the existing Green Wedge link to the countryside. Further guidance is provided in other policies.
- 10.19 The Council will work with adjoining Councils and other appropriate bodies, through the Duty to Co-operate and the Harlow and Gilston Garden Town, to bring forward the 'Stort Riverpark', as well as future Green Infrastructure projects to maintain and improve footpaths, cycleways and bridleways and wildlife corridors across the district. The actions and measures contained in the Water Framework Directive will be used to provide opportunities for the Stort Riverpark.
- 10.20 Reflecting the importance of Green Infrastructure in Harlow, the Council is part of 'GreenArc', a partnership of organisations around London, including neighbouring county, district and borough Councils, DEFRA and the Essex Wildlife Trust. GreenArc has a number of aims, including conserving and enhancing key strategic Green Infrastructure resources such as the Stort Valley, and creating and promoting improved links between settlements and the wider countryside.

## WE2 Green Belt, Wedges and Green Fingers

Harlow is surrounded by Green Belt and has a network of Green Wedges and Green Fingers, allocated on the Policies Map.

1. The purposes of the **Green Belt** are to:

- (a) check the unrestricted sprawl of large built-up areas;
- (b) prevent neighbouring towns merging into one another;
- (c) assist in safeguarding the countryside from development;
- (d) preserve the setting and special character of historic towns; and
- (e) assist in urban regeneration by encouraging the recycling of derelict and other urban land.

2. The roles of the **Green Wedges** are to:

- (a) provide physical, visual and audial separation between neighbourhoods and between residential and industrial areas;
- (b) provide Green Infrastructure, including open spaces for sport, recreation and quiet contemplation; wildlife corridors; footpaths, cycleways and bridleways; and rivers, canals, ponds, lakes and other bodies of water;
- (c) protect and enhance natural habitats, ecological assets and landscape features;
- (d) protect existing uses which have an open character;
- (e) provide settings which preserve the character of historic/cultural sites and areas; and
- (f) provide opportunities for Sustainable Drainage Systems (SuDS).

3. Green Fingers are generally smaller and thinner than the Green Wedges. The roles of the **Green Fingers** are to:

- (a) provide open links between Green Wedges and/or other areas of green space;
- (b) provide Green Infrastructure, including wildlife corridors; footpaths, cycleways and bridleways; and rivers, canals, ponds, lakes and other bodies of water;
- (c) protect and enhance natural habitats, ecological assets and landscape features; and
- (d) protect existing uses which have an open character.

4. **New Green Wedges or Green Fingers** must fulfil the above roles and:

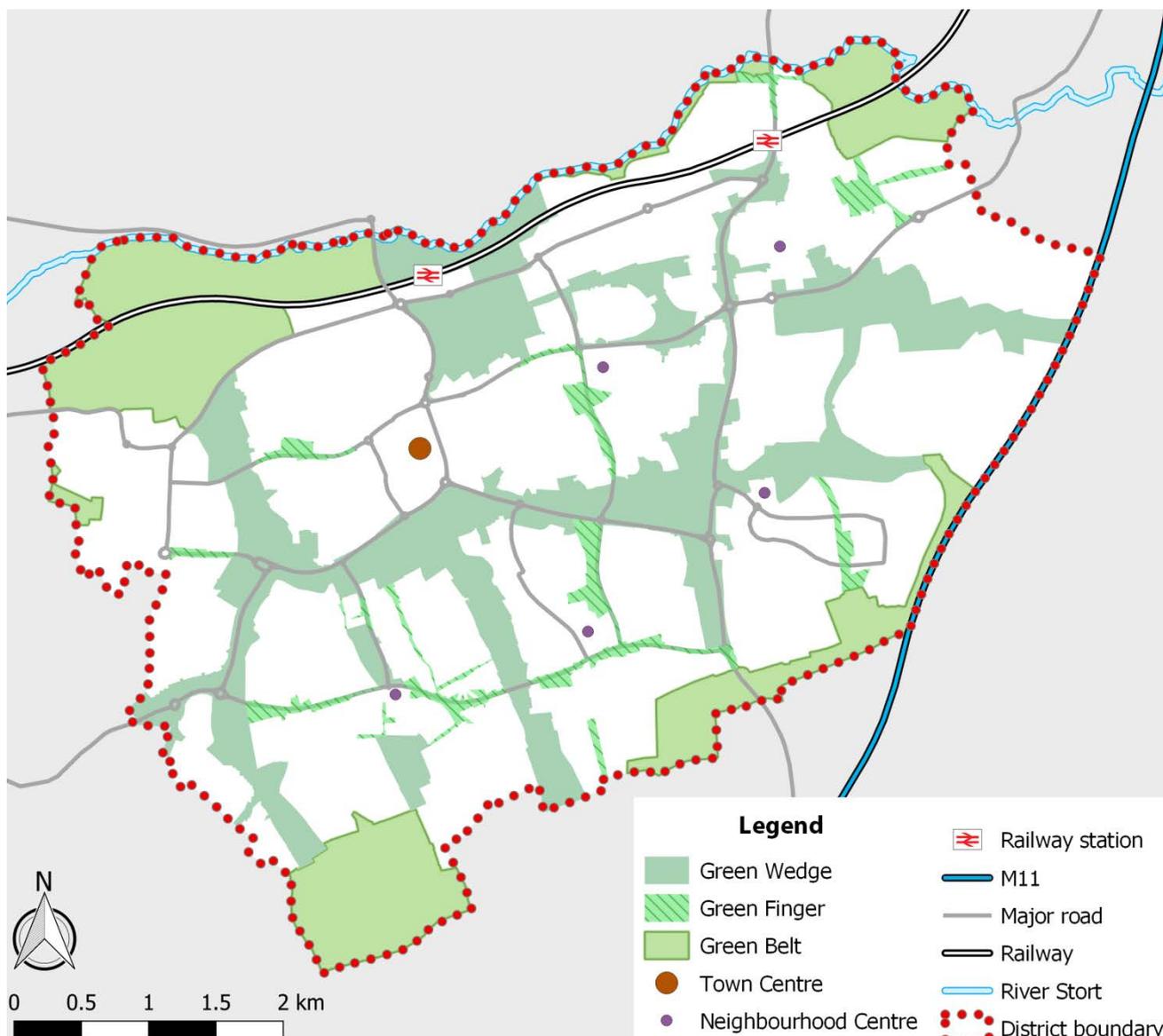
- (a) where possible should connect with existing Green Wedges, Green Fingers and/or the Green Belt;
- (b) be well-connected to residential areas;
- (c) be defined by a strong urban edge; and
- (d) development should front green spaces to provide a strong interface and natural surveillance.

## Justification

- 10.21 The Green Wedges and Green Fingers were originally included as 'landscape wedges' and 'parkways' in Sir Frederick Gibberd's landscape-led master plan for Harlow. They were designed to embrace natural features such as valleys, woods and brooks, and separate the neighbourhoods with open spaces which could be used by residents.
- 10.22 Green Wedges and Green Fingers are, therefore, fundamental to the character of Harlow and are an enduring legacy of Sir Frederick Gibberd's original master plan. Nowadays they continue to make a significant contribution to the district's Green Infrastructure, performing their identified important roles, and previous Local Plan consultations have provided evidence that they are highly valued by Harlow residents.
- 10.23 The extent of Green Wedges and Green Fingers in Harlow, as allocated on the Policies Map, is shown in Fig. 10.2, overleaf.

*Chapter continues on next page.*

Fig. 10.2: Green Wedges, Green Fingers and Green Belt in Harlow



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### Implementation

10.24 The Green Wedges and Green Fingers are protected from inappropriate development.

10.25 New development must incorporate new Green Wedges and/or Green Fingers, depending upon the size of the development, preferably linked to existing Green Wedges, Green Fingers or the Green Belt.

10.26 In order to contribute to the delivery of the Garden Town principles in developments in the Harlow and Gilston Garden Town, there is an opportunity for a new Green Wedge to be extended into the Strategic Housing Site East of Harlow, which forms part of one of the new four Garden Town Communities, linking with the existing Green Wedge to the west and the Green Belt (in the Epping Forest District) to the east.

10.27 This new Strategic Green Infrastructure would, in particular, contribute to the Garden Town principles of “combining the best of town and country to create healthy communities, including opportunities to grow food” and the provision of “a comprehensive green infrastructure network and net biodiversity gains”.

## **WE3 General Strategy for Biodiversity and Geodiversity**

### **Internationally Designated Wildlife Sites**

1. Development proposals which may have an adverse impact on any internationally designated wildlife site, either alone or in-combination, must satisfy the requirements of the Conservation of Habitats and Species Regulations, determining site-specific impacts and avoiding or mitigating against impacts identified.

### **Nationally Designated Wildlife Sites**

2. Development which would harm the nature conservation or geological interest of a nationally important wildlife site, as shown on the Policies Map, will not be supported, unless:

- (a) it is required in connection with the management or conservation of the site; or
- (b) the development provides appropriate avoidance or mitigation measures and, as a last resort, provides compensation to offset any adverse impacts on the interest features of the site; or
- (c) there are imperative reasons of overriding public interest for the development; and
- (d) there is no alternative to the development.

Compensation for the harm will be required.

### **Locally Designated Sites of Wildlife Value**

3. Development on, or which negatively affects, a Local Wildlife Site or Local Nature Reserve, as shown on the Policies Map, will not be supported unless:

- (a) local development needs significantly outweigh the nature conservation value of the site; and
- (b) the development provides appropriate avoidance or mitigation and, as a last resort, provides compensation measures to offset any detriment to the nature conservation interest on the site.

## Justification

- 10.28 Harlow benefits from a range of biodiversity assets, many of which pre-date the development of the New Town, such as ancient woodland and well-established sites of wildlife importance. Sir Frederick Gibberd's master plan for Harlow sought to retain these assets in order to preserve the rich diversity of habitats in the district.
- 10.29 Many of Harlow's open spaces have been designated for their local and national wildlife importance, including 42 Local Wildlife Sites and three Sites of Special Scientific Interest (SSSIs). Two of these SSSIs are located at Parndon Wood in the south and the other located in the north-west at Hunsdon Mead. There are currently no designated geodiversity assets in Harlow, although such assets may be identified in the future.

## Implementation

- 10.30 All biodiversity and geodiversity assets in Harlow are protected from inappropriate development.
- 10.31 Designated biodiversity and geodiversity assets are allocated on the Policies Map. The order of asset type follows the hierarchy in this policy (i.e. within the district Sites of Special Scientific Interest are the highest order asset type). Non-designated assets of biodiversity and geodiversity importance, which extend the geodiversity and network of biodiversity and open spaces across the district, are identified in Evidence Base studies.
- 10.32 The Council will work with Natural England, the Essex Wildlife Trust, the Biological Records Centre, Essex County Council and other bodies to conserve, enhance, protect and manage protected sites and landscapes in accordance with their level of international, national, regional or local importance.

*Chapter continues on next page.*

## WE4 Safeguarding Wildlife Sites Beyond the District Boundary

Development in the plan area, either alone or in combination with other plans or projects, may have an adverse effect on the integrity of the Epping Forest Special Area of Conservation (SAC) as a result of disturbance from recreational activities or air pollution from increased vehicle movements.

Where significant effects on the Epping Forest SAC alone or in combination are likely, a project level Habitats Regulation Assessment may be required.

Development may also have an adverse effect on Hatfield Forest Site of Special Scientific Interest (SSSI) as a result of disturbance from recreational activities.

In relation to Epping Forest and/or Hatfield Forest, development will be required if necessary to include avoidance or mitigation measures as set out in the respective Mitigation Strategies to be adopted by the Council which may include:

- (a) provision of informal greenspace for recreation within the application site;
- (b) provision, or a contribution towards, suitable alternative natural greenspace off-site;
- (c) the improvement of existing nearby recreational opportunities;
- (d) financial contributions towards strategic access management measures in Epping Forest or Hatfield Forest as appropriate;
- (e) financial contributions or other measures to improve air quality in Epping Forest;
- (f) monitoring of the impacts of new development on these wildlife sites to inform the refinement of any necessary mitigation requirements.

Where necessary, contributions towards the measures set out in the Epping Forest Mitigation Strategy will be sought from developments within the Epping Forest Recreational Zone of Influence (ZOI) in order to mitigate and avoid in-combination effects on the Epping Forest Special Area of Conservation (SAC). If necessary contributions will also be sought to address any in-combination air pollution impacts.

### Justification

10.33 Whilst there are no European designated sites within the district boundary, there are three which are located within sufficient proximity that there could be impact pathways arising from development in the Local Plan such that the integrity of the sites could be affected. These are Epping Forest SAC, Wormley-Hoddesdonpark Woods SAC and the Lee Valley SPA/Ramsar site. However, of these the habitats regulation assessment produced in support of the plan demonstrates that only in the case of Epping Forest SAC is an adverse effect likely unless satisfactory avoidance or mitigation is put in place.

10.34 Adverse effects may arise due to disturbance from recreational activities as a result of the additional population in the area and air pollution from additional vehicle movements through the forest. In addition, adverse effects may arise in the case of

Hatfield Forest, a nationally designated SSSI, due to disturbance from recreational activities.

## Implementation

- 10.35 A visitor survey undertaken in 2017 found that 75% of visitors to Epping Forest arise from within 6.2 km of its boundary which can be considered the core recreational catchment area or 'zone of influence'. This only involves a small part of the south of the district. In the case of Hatfield Forest, however, the catchment area extends to 14.6 km, which includes the whole of the district and all four proposed Garden Town Communities. Further visitor surveys will be undertaken from time to time for monitoring purposes and may result in changes to these zones of influence.
- 10.36 In order to avoid potentially adverse effects on these two sites due to recreational pressure from new residents, the Councils concerned are working with Natural England and the site owners to develop suitable mitigation strategies which will be formally adopted as supplementary planning guidance in due course. If necessary, new development in the district will be expected to include or provide the avoidance and/or mitigation measures set out in these strategies which will be updated from time to time to take account of new scientific evidence or monitoring information.
- 10.37 In the case of the large housing site East of Harlow, which lies outside the zone of influence of Epping Forest SAC but well within that of Hatfield Forest SSSI, strategic green infrastructure will be required within the development to maximise its self-sufficiency for informal recreation and this may meet the necessary requirements.
- 10.38 In terms of air quality, it is estimated that 99% of all additional vehicle movements through Epping Forest SAC during the plan period will arise from growth in Epping Forest district rather than the neighbouring authorities including Harlow. Natural England agree that growth in Harlow district will have a small or negligible effect and in this instance it would be reasonable for air quality mitigation measures to be the responsibility of Epping Forest district. Nevertheless, in case the position changes in future, criterion (d) is included in Policy WE4.
- 10.39 Policy WE4 will be implemented in the context of co-operation between the Councils and other bodies concerned with the protection of each site. Harlow Council is committed to this co-operation and, following full discussion and agreement, will formally adopt supplementary planning guidance setting out any necessary requirements for development within its district.

*Chapter continues on next page.*

## WE5 Heritage

Heritage assets and their settings found within the district will be conserved or enhanced. The types of asset designation are:

- (a) Conservation Areas
- (b) Scheduled Monuments
- (c) Listed buildings and their curtilage
- (d) Registered Parks and Gardens
- (e) Archaeological remains

Locally listed buildings are known as non-designated heritage assets. The Conservation Areas, Scheduled Monuments and a Registered Park and Garden are identified on the Policies Map.

### Justification

10.40 National planning policies and guidance outline the rationale behind the designation of heritage assets, with special architectural or historic interest being at the core of any designation decision. National planning policies also set out the hierarchy of significance of historic assets. The Department for Culture, Media and Sport (DCMS) designates listed buildings and Scheduled Monuments. Locally listed buildings have also been identified which contribute towards the district's heritage. The district's ten Conservation Areas have been designated because of their special architectural or historic interest. These areas are kept under review and amended, and where appropriate, new areas designated.

10.41 Harlow has several Scheduled Monuments including a number of historic moats and burial mounds, earthwork remains of medieval villages, a barn, a chapel and remnants of Roman villas and temples. The district has a rich historical past and contains various archaeological remains, which were preserved during the development of the New Town.

10.42 Harlow has one Historic Park and Garden to the east of the district which was previously owned, developed and maintained by Sir Frederick Gibberd. The gardens and the house are located within the Stort Valley to the east of Harlow.

### Implementation

10.43 The heritage assets and their settings are protected from inappropriate development.

10.44 The register of nationally listed buildings is maintained by Historic England. The register of locally listed buildings is available for inspection on the Council's website online and may be revised during the Local Plan period.

10.45 The Council has completed character appraisals and management plans for several of the district's Conservation Areas. This is part of the ongoing monitoring and review process.



**STRATEGIC GROWTH STRATEGY FOR HARLOW**

**11. Strategic Infrastructure Requirements**



# 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS

## Introduction

- 11.1 It is important that the necessary hard and soft infrastructure is in place to support development in the Harlow and Gilston Garden Town. Hard infrastructure includes physical items that will help deliver development such as new roads, railways, pipes and pylons and social infrastructure which supports new communities such as schools, healthcare centres, police and emergency services. Soft infrastructure includes environmental management, training programmes and business support services. An Infrastructure Delivery Plan (IDP) has been prepared which identifies the infrastructure required to support the development set out in the Local Plan including, where it is required, when it will be provided, phasing arrangements and how it will be funded.
- 11.2 Connecting and linking development sites to community services and facilities in Harlow is important to securing sustainable development in the Harlow and Gilston Garden Town. An improved transport and Green Infrastructure network is therefore vital and as part of this several gateway locations have been identified for enhancement with the intention of enhancing key destinations and the legibility of important routes.
- 11.3 Essex County Council is the waste and minerals authority for the County of Essex and has prepared development plan documents for minerals supply and waste management. These documents sit alongside the Local Plan and have been taken into consideration and included in this chapter.

## Corporate Priorities

- 11.4 This chapter and the policies contained within it will help deliver all of the Council's Corporate Priorities, as follows:
- **More and better housing**
  - **Regeneration and a thriving economy**
  - **Wellbeing and social inclusion**
  - **A clean and green environment**
  - **Successful children and young people**

## Local Plan Strategic Objectives

- 11.5 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 1 - Create and enhance high quality built environments which are well connected to revitalised green spaces**
  - **Objective 11 - Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**

- **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**
- **Objective 13 - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities**
- **Objective 14 - Reduce the need to travel by vehicle and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport**
- **Objective 15 - Improve transport links, particularly for sustainable modes of transport, to access all facilities and jobs**
- **Objective 16 - Enhance and promote the role of Harlow as a transport interchange along the M11**

## SIR1 Infrastructure Requirements

The Council will work with infrastructure and service providers, other statutory bodies and neighbouring local authorities to deliver the timely provision of infrastructure necessary to support development in the Harlow and Gilston Garden Town.

An Infrastructure Delivery Plan (IDP) has been prepared for the Harlow area which identifies and prioritises infrastructure projects required in the Local Plan period and sets out funding mechanisms and lead agencies responsible for their delivery.

The IDP will be regularly reviewed and updated where necessary.

Along with the Local Plan, the IDP will be used to bid for funding for infrastructure items needed to deliver development.

Individual development proposals will be required to secure related infrastructure both on- and off-site necessary to make the development acceptable in accordance with Development Management Policy IN6.

The Policies Map identifies infrastructure items which require safeguarding or have a land use implication. This includes:

Ref.	Infrastructure Item
SIR1-1	North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout
SIR1-2	East West Sustainable Transport Corridor
SIR1-3	Second River Stort Crossing at River Way
SIR1-4	Access route for Strategic Housing Site East of Harlow
SIR1-5	Cemetery extension
SIR1-6	New allotment provision

## Justification

11.6 The right infrastructure delivered and phased at the right time is fundamental in delivering sustainable development in the Harlow and Gilston Garden Town. The Council has been working in partnership with adjoining local authorities, statutory bodies and infrastructure providers to identify the infrastructure items required to deliver the growth coming forward across the Harlow area in the Local Plan period and wherever possible beyond that period. The fundamental items of infrastructure required to deliver growth are set out below.

### Transport

11.7 The Local Plan's overall approach is to reduce the need to travel, and support the use of sustainable modes of travel including walking, cycling and public transport with less reliance on the use of the private motor vehicle.

11.8 Harlow's unique character created from key masterplanning principles has resulted in a strong relationship between the urban form and the Green Wedge and Green Fingers network, through which transport corridors pass. The Green Wedges and Green Fingers provide a series of connectable open spaces which link major facilities and services, offering a pleasant and attractive footpath, cycleway and bridleway system. As a consequence of the design and layout of Harlow, the highway network is compact but flexible to change and improvement.

11.9 In order to deliver long-term sustainable growth in the district, further enhancements to the transport network will be required. These enhancements have been identified in the medium to long-term and in some cases beyond the Local Plan period where finance and delivery is difficult to predict. Current projects are not listed. Some of the proposals will be delivered by developers as part of their development, whereas some other schemes will be financed and delivered by a number of sources as set out in the IDP. They currently include:

- (a) Junction 7a on the M11 and widening of Gildea Way;
- (b) Improvements to Junction 7 of the M11;
- (c) Widened Central Stort Crossing between Eastwick roundabout and Burnt Mill roundabout;
- (d) New Second Stort Crossing between Eastwick Road in East Hertfordshire District and at River Way in Harlow;
- (e) North-south Sustainable Transport Corridor from the Gilston area to the north of the Garden Town to Latton Priory to the south;
- (f) East-west Sustainable Transport Corridor from The Pinnacles to the Strategic Housing Site East of Harlow;
- (g) Capacity improvements to Second Avenue;
- (h) Junction improvements at Third Avenue/Abercrombie Way and at Katherine's Way/ Southern Way/Water Lane junction;
- (i) Southern Way improvements including pedestrian crossings and speed reductions;
- (j) Improved access to Harlow Mill Train Station and four-tracking of the West Anglia Mainline.

- 11.10 Access improvements to, from and within the town centre will be identified through the Harlow Town Centre Area Action Plan.
- 11.11 A northern by-pass which would connect the Gilston area with Junction 7a of the M11 has been identified as a potential long-term highway solution to alleviate congestion along Gilden Way. However the overall priority is to ensure the Harlow and Gilston Garden Town becomes a sustainable town providing accessible housing and employment areas, community services and other facilities supported by a durable sustainable transport network, thereby reducing car usage and the need for highway focused interventions.

### **Education**

- 11.12 Essex County Council, as local education authority, is responsible for ensuring there are sufficient school places available by building or extending schools. Harlow Council has been working closely with Essex County Council to identify the most sustainable solutions for future education provision. The council will also work with other education providers including independent schools and academy trusts. Land given over for schools must meet the criteria set out in Essex County Council's Developer's Guide to Infrastructure Contributions.
- 11.13 In Harlow there is an overall need to provide additional secondary school places. A new secondary school will be provided in the new Garden Town Community to the east of Harlow, and a new 8FE secondary school is being opened in Harlow (the new 'Sir Fredrick Gibberd Academy'). While this contributes some capacity to meet housing growth, this is being established to serve existing population (cohort) growth. There is also additional capacity in some of the existing secondary schools in Harlow. The provision of new schools in the new Garden Town Community to the east of Harlow will have a land use implication; however their location is still to be determined by an agreed Strategic Master Plan.
- 11.14 There is an overall need to provide additional primary school places in Harlow as set out in the IDP, of which some provision is already committed. The remaining provision will be delivered through expansion plans and through the provision of new primary schools located within new residential developments to the east. The Garden Town communities identified as part of the Harlow and Gilston Garden Town will deliver new schools as part of their proposals.
- 11.15 Across the district there will be a requirement for early years and childcare provision, with a particular deficit to the east due to the number of new homes being delivered in this area. Education facilities will be provided through the Strategic Housing Site East of Harlow which will include an element of early year and childcare facilities.

### **Healthcare**

- 11.16 Harlow pioneered the development of health centres and multi-professional medical centres which combined several health related services into one location.

- 11.17 The Council and Harlow Health Centres Trust are working together to expand health facilities for existing population growth and will work with the Clinical Commissioning Groups (West and East Essex and North Hertfordshire) and NHS England to deliver new health facilities as part of planned growth. New healthcare facilities will be delivered where necessary, as part of new settlements ideally located in accessible locations, situated in a local centre with a range of other community facilities. Increasing capacity within current infrastructure will also be explored.
- 11.18 The Princess Alexandra Hospital NHS Trust has approved a preferred way forward for the provision of a new hospital. This option comprises the development of a new state of the art local acute hospital at land within the Epping Forest portion of the East of Harlow Garden Community.
- 11.19 In the event that the Hospital is relocated, land at Princess Alexandra Hospital may be redeveloped for housing with a capacity of up to 550 homes (see Policy HS2). In the event that the Hospital is not relocated and remains in situ, the redevelopment of the site for healthcare purposes will be supported and taken forward in accordance with the agreed master plan to be prepared by the Hospital Trust. Under the latter option, surplus land may be identified which could accommodate approximately 100 new homes.
- 11.20 The purpose of the master plan would be to provide certainty for the Hospital Trust, to allow for the phased delivery of its strategic long-term objectives for healthcare provision and investment.
- 11.21 New and improved healthcare facilities play an important role in sustaining the Harlow and Gilston Garden Town and the Council will work with the hospital and all relevant parties to help deliver this.

### *Community Facilities*

- 11.22 Community facilities cover a variety of buildings and services which underpin successful and vibrant communities and help develop social activities. It also includes future provision of burial space.
- 11.23 The provision of community buildings including youth centres, community halls, sports and leisure provision and libraries have been identified in the IDP and the Built Facilities and Playing Pitch Strategies. The Council will work with developers and statutory providers to deliver community uses across the district including provision on the Strategic Housing Site East of Harlow and through the masterplanning of the other Harlow and Gilston Garden Town Communities.
- 11.24 There are currently 35 named allotments and additional provision is proposed for development sites at Gilden Way, Newhall and the Strategic Housing Site East of Harlow.
- 11.25 Proposals are in place to extend the existing crematorium and cemetery to the south of the district. The extension is allocated on the Policies Map. This also includes a green passageway for the movement of fauna between the two Sites of Special Scientific Interest (SSSIs) which abut the crematorium.

*Utilities*

- 11.26 The Council will work with the relevant statutory providers to ensure that development sites are well served by utility provision including electricity, gas, wastewater, potable drinking water, sustainable drainage, broadband and telecommunications.
- 11.27 The Council will seek the best use of existing infrastructure as well as providing the best possible opportunity to provide additional infrastructure capacity. The Council also supports the use of smart energy solutions to support low carbon developments. Developments should consider the incorporation of energy storage, demand side response, smart metering and smart heating controls to optimise the efficient use of heating and power systems.
- 11.28 The Council recognises that decarbonisation may lead to increased uptake of heat pumps, electric heating, electric vehicles and renewable energy. Developments should seek to ensure that electrical infrastructure is designed to accommodate a future increase in electricity demand and renewable energy generation through appropriately sized substations and consideration of three phase supply to domestic properties.
- 11.29 Electricity Services in Harlow are provided through the UK Power Networks Eastern (UKPN) distribution area and is supplied from the Harlow West Grid substation. The UKPN Regional Development Plan included a growth assumption of 16,000 dwellings in and around Harlow, the equivalent of the Harlow and Gilston Garden Town, to 2033. Projects have been identified for the electricity infrastructure needed to meet this growth and it is expected that this will be funded through the utility firm and developers.
- 11.30 There are no known existing gas deficiencies in Harlow. The Council will continue to work with the suppliers to ensure the network can accommodate growth and any infrastructure will be covered by the utility provider.
- 11.31 There is already significant telecommunications and broadband infrastructure in Harlow and the district is in excess of the Government's 95% coverage target. The Development Management policies encourage broadband coverage to be extended into new developments and that telecommunications equipment is provided in Harlow.
- 11.32 The Council will work with the Environment Agency and the Flood Risk Management Authority to implement flood alleviation schemes as set out in the Strategic Flood Risk Assessment and Surface Water Management Plan for Harlow. The Development Management policies ensure that water quality, water management, flooding and sustainable drainage is fully considered as part of new development proposals.
- 11.33 Harlow falls into the Upper Lee catchment area and potable drinking water supply in the district is provided by Affinity Water. The utility firm has a statutory duty to publish Water Resource Management Plans (WRMP) every five years setting out how they will maintain a balance between demand and supply over a 25-year

period. Across Affinity Water's Central Region area, which Harlow is located within, the WRMP sets out water related infrastructure projects which will ensure there is not a water deficit. This infrastructure will be funded through a combination of direct funding from the utility company and through developers.

- 11.34 Thames Water is responsible for waste water in Harlow and the surrounding area and they are tasked in preparing Asset Management Plans every five years. These Management Plans have been informed by discussions to ensure infrastructure is in place to accommodate growth. Harlow is served by the Rye Meads Sewage Treatment Works which is currently being upgraded to increase capacity.
- 11.35 Thames Water position statements indicate capacity in the Treatment Works up to 2036, subject to further improvements to sludge and storm streams. Further network modelling is being undertaken by Thames Water to understand sewer capacity in the area before outlining further intervention solutions. This modelling work will inform a Watercycle Study being prepared by the Council. It is anticipated that solutions to improving the network will be jointly funded by the utility providers and developers.
- 11.36 When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements to the satisfaction of the relevant water and sewerage undertaker will be completed prior to occupation of the development.

## Implementation

- 11.37 This chapter is supported by a detailed IDP which sets out the infrastructure items required to support the Local Plan, and who is responsible for delivery, how the items are to be funded and when the infrastructure will be delivered. It provides detailed information on delivery and funding for the infrastructure required in the first five years of the Local Plan Period and infrastructure which is critical to delivering the Local Plan. It also provides as much detail as possible for medium and long-term projects.
- 11.38 The Council will need to work closely with a number of partners and organisations to bring forward both strategic and local infrastructure schemes in the district and the Harlow and Gilston Garden Town. This includes Essex County Council and Hertfordshire County Council who are responsible for the local highway networks, education provision, particular health and social care needs and other community facilities such as libraries. The Council will also liaise with other statutory bodies and site developers to bring forward other supporting infrastructure and ensure the delivery of development sites.
- 11.39 Infrastructure items will be funded by a number of sources. This can include, for example, the District Council, County Councils, infrastructure/utility providers, developers or through grants and funding bids. Specific infrastructure items that are required to deliver growth locations and development sites will mostly be funded by Section 106 Agreements between the Council, County Council and the developer.

- 11.40 The Council will prepare a Planning Obligations Supplementary Planning Document (SPD) which will provide guidance to statutory agencies, community organisations, developers and stakeholders involved in the development process and will be updated regularly.
- 11.41 If evidence in the IDP, as updated, indicates that the prospects for the realistic delivery of infrastructure have changed and are unlikely to support planned development, the Local Plan will be reviewed.

#### *Household Waste Facilities*

- 11.42 The Council will work together with Essex County Council to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves Harlow. Collaboration will be required with Hertfordshire County Council in respect of waste needs for the wider Garden Town area. Any facilities should be of a sufficient size and capacity that meets the needs of this growth and situated within an easily accessible location within the catchment areas of the new Garden Town communities.

*Chapter continues on next page.*

## SIR2 Enhancing Key Gateway Locations

The following gateway locations have been identified in the district:

1. Routes to and from Junction 7a of the M11 along Gildea Way
2. The A414 where it meets with Junction 7 of the M11
3. River Stort Crossing where Fifth Avenue enters and exits the Harlow district boundary
4. Eastern Stort Crossing which enters Templefields Employment Area at River Way
5. The southern terminus of the Sustainable Transport Corridor where it first enters Harlow from development sites in Epping
6. Cambridge Road where it enters Harlow from Hertfordshire to the east of the district
7. Vehicular and pedestrian access points to the north of the Town Centre
8. Vehicular and pedestrian access points at as you first enter the strategic employment sites

The gateway locations above will be seamlessly integrated within the wider transport and Green Infrastructure network of Harlow and enhanced and improved through the use of:

- (a) appropriate landscaping and boundary treatments;
- (b) open spaces which continue the principles of Green Wedges and Green Fingers;
- (c) public art and improved signage;
- (d) improved pedestrian and cycle routes which are legible and connect with the existing network;
- (e) security and safety measures which assist in providing pleasant and attractive routes.

### Justification

11.43 The gateway locations set out above have been identified as important entrance points for commuters and visitors to Harlow and linkages that connect the Harlow and Gilston Garden Town communities with the Harlow urban area. Their enhancement, improvement, legibility and integration are therefore important to the overall design and layout of the town and in implementing the design principles of Sir Frederick Gibberd's original master plan throughout the Garden Town. Their improvement will also enhance key destinations including the town centre and employment areas, act as attractors for businesses looking to locate to the district and make public transport routes, cycle and pedestrian pathways more attractive to users. Further gateway locations may be identified as development proposals are brought forward in the Harlow and Gilston Garden Town. The exact location for the key gateways have not been shown on the Policies Map as improvement projects are yet to be defined and proposals will develop through the masterplanning of development sites and regeneration schemes.

## Implementation

11.44 Improvements and enhancements will be sought through the design and masterplanning stages of schemes and developments and through discussions with adjoining Councils, developers and via the Harlow and Gilston Garden Town Quality Review Panel and the Vision and Design Guide.

## SIR3 Waste and Minerals

The Council will work with Essex County Council to bring forward the Waste and Minerals Development Plan Documents.

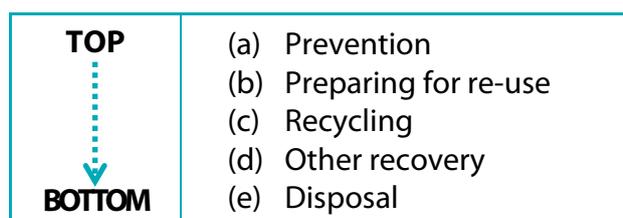
These documents form part of the Development Plan for Harlow and include Site SIR3-1 Harlow Mill Rail Station which is safeguarded as a Transhipment Site and Coated Stone Plant.

## Justification

11.45 Essex County Council is responsible for waste and minerals planning in Harlow and has prepared a Waste Development Plan Document and a Minerals Development Plan Document. They include allocations and Development Management policies. These documents form part of the Local Plan and will be taken into consideration as part of the submission of planning applications.

11.46 The Council will ensure that the principles of the Waste Hierarchy (see Fig. 11.1) continue to be implemented as part of its contribution to waste planning and will aim to achieve a recycling target of 50%<sup>19</sup>.

Fig. 11.1: Waste Hierarchy



11.47 Implementation of this policy will require a collaborative approach between the Council and Essex County Council as the waste and minerals authority. The Council will ensure that applications take into consideration waste and minerals development plan documents.

<sup>19</sup> The EU Waste Framework Directive states that the UK must recycle 50% of household waste by 2020.

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**DEVELOPMENT MANAGEMENT**

**12. Background to  
Development Management in Harlow**



# DEVELOPMENT MANAGEMENT

## 12. BACKGROUND TO DEVELOPMENT MANAGEMENT IN HARLOW

- 12.1 Development Management policies provide a detailed planning framework which will be used to determine planning applications. They are informed by national policies and guidance which set out the Government's planning policies for England and how it expects them to be applied.
- 12.2 National planning policies state that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three roles:
- (a) an economic role by contributing to a strong, responsive and competitive economy;
  - (b) a social role by supporting strong, vibrant and healthy communities; and
  - (c) an environmental role by contributing to the protection and enhancement of the environment.
- 12.3 These Development Management policies have been developed to help achieve sustainable development and to provide the detailed spatial expression of the Strategic policies in the Local Plan.
- 12.4 The Development Management policies have been grouped to reflect the broad Spatial Objectives of the Local Plan. Through their implementation, the Council will ensure all development proposals have regard to these objectives.



**DEVELOPMENT MANAGEMENT**

**13. Placeshaping**



## 13. PLACESHAPING

### Introduction

- 13.1 Promoting good design is fundamental to achieving high-quality, inclusive development and is an important consideration for new buildings and public and private spaces. It goes beyond aesthetic considerations, addressing issues such as connectivity between people and places and the integration of development into the natural, built and historic environment.
- 13.2 Harlow's New Town historic environment, based on the design principles set out in the master plan prepared by Sir Frederick Gibberd, established the overall layout and character of the town. The dominant green spaces provide a sense of openness and tranquillity in an otherwise relatively densely populated urban area. The policies contained within this chapter aim to conserve, protect and enhance the natural and built environment of Harlow, including its green spaces, biodiversity and overall landscape quality. The policies also aim to safeguard the environment from harmful development that may affect, for example, air quality, water quality or flood risk.
- 13.3 The district currently has ten Conservation Areas, designated for their special architectural or historic interest. The Conservation Area status aims to ensure the character and appearance of these areas is protected. There are also 168 listed buildings in Harlow which are preserved and enhanced through the policies in the Local Plan. The Council has also sought to identify buildings and structures which have not been identified nationally for listing but which contribute towards the district's distinct character and historic environment.

### Corporate Priorities

- 13.4 This chapter and the policies contained within it will help deliver the Council's Corporate Priorities, as follows:
- **A clean and green environment**

### Local Plan Strategic Objectives

- 13.5 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 1 - Create and enhance high quality built environments which are well connected to revitalised green spaces**
  - **Objective 2 - Deliver high quality design through new development whilst protecting and enhancing the district's historic environment**
  - **Objective 3 - Adapt to and mitigate the impacts of climate change**
  - **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

# PL1 Design Principles for Development

A high standard of urban and architectural design is expected for all development. Development must meet the following criteria:

- (a) it is supported by a design rationale based on an understanding and analysis of local context and character, taking into consideration the adopted Harlow Design Guide Supplementary Planning Document (SPD), the Harlow and Gilston Garden Town Vision and Design Guide, the services and access chapter of the Essex Design Guide, and relevant national guidance;
- (b) it protects, enhances or improves local distinctiveness without restricting style and innovation, whilst taking account of local character and context, including patterns of development, urban form and landscape character, Green Infrastructure including trees and landscaping, building typology and the historic environment;
- (c) it responds to the scale, height, massing, architectural detailing, materials and front boundary treatments of the surrounding area and is visually attractive;
- (d) it provides appropriate physical, legible and safe connections with surrounding streets, paths, neighbouring development and Green Infrastructure;
- (e) it provides logical and legible layouts which support active street frontages, improves the public realm, provides distinction between public and private space, and provides an appropriate level of well-designed and well-located high quality landscaping;
- (f) it forms inclusive development that is accessible, well-connected, gives sustainable modes of transport priority over private vehicles, and integrates land uses with sustainable modes of transport;
- (g) it is flexible enough to respond to economic, social, environmental and technological change;
- (h) it creates safe and secure environments which help to reduce opportunities for crime and minimise the fear of crime.

## Justification

13.6 This policy sets out the design criteria for all development in Harlow, taking into account the requirements of the adopted Harlow Design Guide SPD. It also ensures the design and layout of new development respects Sir Frederick Gibberd's master plan for the New Town, which ensured the town was planned to be contained within the original landscape and to retain as many natural features as possible.

## Implementation

13.7 This policy is applicable to all development types in the district, whether they are for the provision of buildings and structures or the layout of places and spaces.

13.8 A Planning Statement and Design and Access Statement will be required for major developments and, where appropriate, may be required for other developments. They should demonstrate how the criteria in this policy and relevant national planning policies and guidance have been complied with.

- 13.9 For further guidance and explanation on the characteristics of high quality urban and architectural design and the methods to create safe and secure environments, applicants should refer to the adopted Harlow Design Guide SPD. This will be used to guide and assess future development across Harlow and will be a material consideration in the determination of planning applications. Applicants should also refer to the services and access chapter of the Essex Design Guide, which provides detailed highways design guidance.

## PL2 Amenity Principles for Development

Development which preserves or enhances the level of amenity of existing and future occupants and neighbours in the local area will be supported.

In assessing the acceptability of development on amenity, the following criteria and the cumulative effects will be considered.

- (a) privacy and overlooking;
- (b) overshadowing and loss of daylight and sunlight;
- (c) aspect and outlook;
- (d) overbearing and the perception of overbearing;
- (e) the perception of enclosure;
- (f) access to high quality and useable amenity space;
- (g) compatibility and sensitivity of adjacent uses.

### Justification

13.10 This policy aims to promote and protect high standards of amenity. This is a key element of sustainable growth and continued regeneration, and will assist in meeting the Council's priority to ensure regeneration takes place in the district.

13.11 This policy also aims to avoid loss of privacy due to the proximity and design of development and will allow sufficient daylight and sunlight to penetrate into and between buildings. It also takes into account the need for development to provide access to amenity space and links with Harlow's wider Green Infrastructure network.

### Implementation

13.12 For further guidance, applicants should refer to the adopted Harlow Design Guide Supplementary Planning Document (SPD). This is useful when considering the design and layout of new buildings, structures, places and spaces.

## PL3 Sustainable Design, Construction and Energy Usage

New development will be expected to deliver high standards of sustainable design and construction and efficient energy usage, taking account of predicted changes to heating and cooling requirements as a result of climate change.

### Justification

- 13.13 Local Plans should consider climate change, the effects of which are wide-ranging and can lead to increased drought, extreme weather events (including heatwaves, snow and storms) and surface water flooding. Such impacts could have a major negative impact on the local economy, people, infrastructure and environment.
- 13.14 This policy seeks to reduce the impact of new development on the environment and this should be read in conjunction with the Strategic policies set out the Local Plan which identify the most sustainable locations for growth and promote the use of sustainable modes of transport.
- 13.15 Many buildings in Harlow are a legacy of its New Town historic environment and were constructed using the methods and techniques of the time. Some of these buildings are now no longer fit for purpose and need replacement. The Council will ensure that new buildings are constructed in a sustainable manner and accord with current best practice.
- 13.16 This policy encourages applicants to consider the impact of their development and seek ways to address the effects, above and beyond those measures required by Building Regulations. The preferable amount by which the minimum Building Regulations standards should be exceeded is set out in the Implementation section of this policy, and is based on policy recommendations of the UK Green Building Council<sup>20</sup> which were, in part, derived from the now-defunct Code for Sustainable Homes Level 4 standard.
- 13.17 This policy assists in the delivery of the Local Plan Strategic Vision, which states that, by 2033, new development will mitigate and adapt to the effects of climate change. It also reflects legislation enacted in 2019, which amends the Climate Change Act 2008 so that, in 2050, UK greenhouse gas emissions are at least 100% lower than the 1990 baseline, as opposed to the original Act which required a reduction of at least 80%.

### Implementation

- 13.18 The Building Regulations set out the minimum requirements for the conservation of fuel and power. Development will be encouraged to exceed the minimum standards required by Building Regulations. Where exceeded, the amount by which

<sup>20</sup> UK Green Building Council, 2018. *Driving sustainability in new homes: a resource for local authorities.*

the minimum standards should be exceeded is preferably at least 19%. The Council supports development that follows the principles of sustainable construction, and encourages developers to deliver schemes which adopt a fabric-first approach to development and meet the performance and quality set by appropriate standards, such as Passivhaus, Home Quality Mark (HQM) and BREEAM UK New Construction 2018.

13.19 Development proposals must demonstrate how the reduction of energy consumption and carbon dioxide emissions is being considered. The wellbeing of building occupants must also be addressed within the design and layout, by minimising risks of overheating and providing adequate daylight and ventilation. These factors can be addressed by:

- (a) incorporating a range of natural heating and cooling measures as part of the design and layout, including passive ventilation (or low-energy options where mechanical cooling is required) and ensuring appropriate building layout and orientation;
- (b) incorporating the use of Green Infrastructure, such as trees and rain gardens;
- (c) including passive design measures such as window sizing, thermal mass, building orientation and shading;
- (d) generating energy from on-site renewable or low-carbon energy systems, including on-site electricity generation for major development;
- (e) ensuring the efficient use of all roof and vertical surfaces for the installation of low carbon technologies and green roofs;
- (f) considering room layout, depth, height and window opening for optimum daylighting.
- (g) evaluating the risk of overheating and evidencing through modelling to support the design decisions, such as the use of dynamic simulation and thermal modelling to analyse a building's performance in terms of energy usage and internal temperatures;
- (h) maintaining good indoor air quality by providing sufficient ventilation to purge any pollutants such as emissions of formaldehyde & volatile organic compounds (VOCs) from building materials and surface finishes, as well as stale air from other activities such as cooking, bathing, etc.;
- (i) using local, sustainable and energy-efficient construction materials which consider adaptation to and mitigation of the impacts of climate change;
- (j) re-using existing resources.

13.20 Where a low-carbon district heating scheme is proposed, the Council will expect the scheme to demonstrate that any proposed heating and cooling systems have been selected in line with the following order of preference:

- (a) if possible, connection with heat distribution networks which exist at the time;
- (b) site-wide heat network fuelled by renewable energy sources;
- (c) communal network fuelled by renewable energy sources;
- (d) individual Air Source Heat Pump.

13.21 A Sustainability Statement will be required for major development and may be required for other development, detailing the sustainability credentials of the proposed development. This should cover any use of on-site low carbon/renewable energy technology and how the design, massing, layout, construction of the

building and use of Green Infrastructure contributes to reducing carbon dioxide (CO<sub>2</sub>) emissions. The Sustainability Statement should make clear how measures have been incorporated into the design of the development to ensure they are well integrated.

- 13.22 Where a Sustainability Statement is submitted, the developer will be required to provide evidence of the implementation of the target total carbon dioxide (CO<sub>2</sub>) reduction level, by using nationally recognised, independently audited schemes such as Energy Performance Certificates. The evidence should include a clear breakdown of the percentage of carbon savings delivered by building efficiency and the use of any low carbon or renewable energy technologies.

## PL4 Green Belt

Development on land designated as Green Belt will be severely restricted to ensure it continues to fulfil the five purposes of the Green Belt. The essential characteristics of Green Belts are their openness and their permanence. Substantial weight will be given to any harm to the Green Belt when assessing planning applications.

1. New buildings are inappropriate in the Green Belt with the following exceptions:

- (a) buildings for agriculture and forestry;
- (b) appropriate facilities for outdoor sport, outdoor recreation and cemeteries;
- (c) the extension and alteration of an existing building providing the original building is not disproportionately increased in size;
- (d) a replacement building for the same use providing it is not materially larger;
- (e) limited affordable housing for local community needs.

2. The following forms of development are not inappropriate providing they preserve the openness of the Green Belt and do not conflict with its purposes:

- (a) limited infilling or the partial or complete redevelopment of previously developed land;
- (b) mineral extraction;
- (c) engineering operations;
- (d) local transport infrastructure which requires a Green Belt location;
- (e) the re-use of buildings of permanent and substantial construction;
- (f) development under a Community Right to Build Order.

Other development is inappropriate development in the Green Belt and will only be permitted in very special circumstances.

Such circumstances only exist if the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Development must not adversely affect the role or function of adjacent land which forms part of a Green Wedge or Green Finger.

## Justification

- 13.23 The Green Belt is a national policy designation, the fundamental aim of which is to prevent unrestricted urban sprawl as well as a number of other purposes as set out in national planning policies.
- 13.24 Since the Ministry of Housing and Local Government Circular in 1955, which recommended that Local Planning Authorities should establish Green Belts, the Green Belt has had great importance attached to it by subsequent Governments. As such, it is protected from inappropriate development through both national and local planning policies. The construction of new buildings and other development which does not meet the criteria of this policy would, therefore, not be supported, unless very special circumstances exist.
- 13.25 Harlow lies within the Metropolitan Green Belt which surrounds London and, although only a small amount of designated land lies within the district boundary, its protection is important to preserve the character and setting of the town.
- 13.26 The Green Belt links with the wide-ranging Green Infrastructure in the district, including the Green Wedges and Green Fingers. The Green Belt in Harlow also provides a physical link with the overall Green Belt and wider countryside in the surrounding Epping Forest and East Hertfordshire districts.
- 13.27 The purpose of this policy is to continue to protect the Green Belt in Harlow from inappropriate development, as such development would conflict with the Green Belt purposes and be harmful to the Green Belt.
- 13.28 As detailed in other Local Plan policies, Harlow's Green Wedges and Green Fingers make a significant and important contribution to the district's Green Infrastructure, by providing a number of roles and functions for the benefits of visitors, residents and wildlife.
- 13.29 One of the functions is to provide access to wider countryside and other open spaces and, therefore, most Green Belt land in Harlow adjoins, or is near to, land designated as Green Wedge or Green Finger. To assist with the protection of the Green Wedges and Green Fingers afforded by other Local Plan policies, this policy ensures that any development in the Green Belt does not adversely affect the roles and functions of adjoining or nearby Green Wedge or Green Finger land.

## Implementation

13.30 The purposes of the Green Belt are set out in national planning policies, as follows:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 13.31 Whilst these purposes are not weighted in terms of significance, national planning policies recognise that the fundamental aim of the Green Belt is to provide permanently open land to prevent unrestricted urban sprawl.
- 13.32 Small-scale development can include householder applications, sports-related development, recreation, cemeteries and community uses.
- 13.33 For development relating to renewable energy, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

## PL5 Green Wedges and Green Fingers

Development on land designated as Green Wedge or Green Finger must meet one or more of the following criteria:

- (a) it is for small-scale development;
- (b) it is for infrastructure, including local transport infrastructure, which demonstrates a requirement for a Green Wedge or Green Finger location and demonstrates it is of benefit to the wider community;
- (c) it is for the alteration, extension or replacement of buildings.

Additionally, development must meet both the following criteria:

- (d) it demonstrates that the roles and functions and historic significance of the Green Wedges and Green Fingers (as set out in policy WE2) are preserved, enhanced and not adversely affected; and
- (e) it demonstrates that the wider landscape and setting is preserved, enhanced, promotes biodiversity and integrates with existing Green Infrastructure.

Where development includes replacement uses, redevelopment, extensions or alterations, it must meet all the following criteria:

- (f) it does not result in a greater negative impact on the roles and functions of the Green Wedges and Green Fingers than the existing development;
- (g) it does not result in disproportionate additions to the original building(s); and
- (h) any replacement buildings must be in the same use.

### Justification

- 13.34 Green Wedges and Fingers are fundamental to the character of Harlow. Sir Frederick Gibberd's master plan sought to preserve the form of the original landscape and the natural features that gave the district its distinctive character; consequently the green areas were generally kept free of buildings and as natural as possible.

13.35 The purpose of this policy is to continue to protect the Green Wedges and Green Fingers from encroachment and visual intrusion, while recognising there may be opportunities for some development within them, where the development benefits the wider community or improves the biodiversity and/or landscaping.

### Implementation

13.36 While the roles and functions of the Green Wedges and Green Fingers differ, these two types of open space are complementary and of equal importance; the main difference being their scale. Details of their roles and functions are set out in Policy WE2.

13.37 Small-scale development can include householder applications, school or sports related development, recreation and community uses, waterway uses and facilities/services related to an existing use.

13.38 Applications for local transport infrastructure must demonstrate their requirement for a Green Wedge or Green Finger location. This would also include the provision of essential infrastructure identified in the Local Plan, or where the applicant can demonstrate that there is no other location within the district that could accommodate the proposed infrastructure.

## PL6 Other Open Spaces

Development on Other Open Spaces must meet the following criteria:

- (a) the development would not compromise the landscape character, openness, biodiversity or urban design principles of the town and/or the surrounding area;
- (b) the development would not remove access to an open space which, in accordance with the current evidence, is of high quality and/or high public value in providing opportunities for sport and recreation;
- (c) the development would not prejudice the potential for comprehensive development of adjacent land.

### Justification

13.39 Along with the preservation of Green Wedges and Green Fingers, the preservation of Other Open Spaces is fundamental to ensuring the original design of Sir Frederick Gibberd's master plan for Harlow is respected, which planned the district to be interspersed with many open spaces to offset the provision of small private gardens.

13.40 Other Open Spaces can be of public value where they have a role or function which makes a positive contribution to the character of the area. Such spaces often provide opportunities for recreational uses and also provide landscaping and visual buffers.

13.41 The aim of this policy is to protect those Other Open Spaces which make a positive contribution, through their specific role or function, to the overall character and design of Harlow. For example, some Other Open Spaces offer amenity and informal recreational opportunities, and therefore contribute to the health and wellbeing of local residents by providing nearby spaces for outdoor and physical activity.

## Implementation

13.42 Other Open Spaces are defined as open spaces, both private and publically owned, which are not allocated as Green Belt, Green Wedge or Green Finger in the Local Plan. Other Open Spaces vary in nature and quality and can include:

- (a) strips of landscaping, for example next to a road, pavement or cycle path;
- (b) amenity spaces and gardens;
- (c) areas of land between buildings;
- (d) informal recreational areas; and
- (e) woodland and landscaping belts.

13.43 An application for infill development, which would block the potential for comprehensive development, would not be supported. For example, where there are open spaces adjacent to each other, the development of one open space in isolation could prevent the opportunity to develop the open spaces as a whole.

## PL7 Trees and Hedgerows

### 1. Existing trees and hedges

Development and tree works applications, which ensure that trees and hedges are protected and enhanced, will be supported. The acceptability of development and tree works will be assessed on the following criteria:

- (a) the impacts the development would have on the trees and/or hedges and the proposed measures to mitigate any impacts;
- (b) the character and value of the trees and/or hedges;
- (c) the existing condition of the trees and/or hedges;
- (d) any existing specific protections the trees and/or hedges currently have;
- (e) the provision of replacement trees and/or hedges, which are a suitable species and ensure canopy cover is maintained and enhanced.

### 2. Trees and hedges in new development

Development which includes the planting of new trees and hedges must meet the following criteria:

- (a) the location and species of the trees and hedges are suitable, when considering their juxtaposition to development and infrastructure both above and below ground;
- (b) the species selection of trees and hedges helps enhance resilience and diversity of the trees and hedges, including genetic and species diversity;

- (c) the total canopy cover of the proposal site will be increased, in the long-term, through the planting of trees, shrubs and hedges;
- (d) where necessary, the below-ground environment is enhanced.

### Justification

- 13.44 This policy aims to protect the trees and hedgerows in Harlow, which form an important part of the Green Infrastructure and landscaping in the district, fundamental to Harlow's original design character. Trees and hedgerows provide wildlife habitats and natural visual and noise buffers, and assist in mitigating the effects of climate change, for example by providing shading and reducing the temperature of the local micro-climate.
- 13.45 Whilst over 300 trees in Harlow are already protected by Tree Preservation Orders, and many trees and hedgerows are found within protected areas such as Green Wedges, there are a number of significant trees and hedgerows found in Other Open Spaces and residential areas.
- 13.46 Many of the trees and hedgerows in the district are over 70 years old and, therefore, pre-date the development of the New Town, as Sir Frederick Gibberd's master plan aimed to respect the existing natural landscape assets. There are over 250 veteran trees in Harlow and many of the existing trees are likely to become veteran and ancient specimens in the future. A number of hedges have historic importance, especially where they are found along original highways and old parish and farm boundaries. Hedgerows are also listed as being of principal importance in Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006) (as amended).

### Implementation

- 13.47 When assessing the impacts of development on trees and/or hedges and measures to mitigate any impacts, an Arboricultural Impact Assessment, Arboricultural Method Statement and Biodiversity Assessment may need to be submitted to the Council.
- 13.48 When assessing the value and condition of existing trees and/or hedgerows, a survey may need to be submitted to the Council. The value that trees and/or hedges offer includes historic, cultural, ecological, economic and amenity value. The condition includes the health and structure of the trees and/or hedges.
- 13.49 Existing specific protections that trees and/or hedges may have include Tree Preservation Orders and other protections offered by Conservation Areas or the Hedgerow Regulations (1997).
- 13.50 The enhancement of the below-ground environment could be achieved through measures such as cellular confinement systems, Sustainable Drainage Systems (SuDS), soil mycorrhizal inoculations and porous surfacing.

- 13.51 The Council may also require a Management Plan to be submitted, which demonstrates how the future maintenance of new trees and hedges would be managed, in order to protect their long-term quality.
- 13.52 Where appropriate, the Council will consult with specialists to obtain advice on tree and hedgerow matters.

## PL8 Green Infrastructure and Landscaping

Green Infrastructure and landscaping must be protected and enhanced as part of development.

Development must meet the following criteria:

- (a) new Green Infrastructure and landscaping are well planned, taking into consideration the practicalities and requirements of future management and maintenance, and providing appropriate footpaths, cycleways and bridleways;
- (b) existing Green Infrastructure and landscaping are protected and enhanced and in all cases are sympathetically integrated into the development;
- (c) development makes connections wherever possible to landscaping and Green Infrastructure outside of the site.

### Justification

- 13.53 Green Infrastructure is an important element of Harlow's distinctive character, which Sir Frederick Gibberd developed within his original master plan to respect the existing natural environment and integrate it within the New Town to provide functional areas of green and open space which could be used and enjoyed by wildlife, visitors and residents.
- 13.54 The requirement of this policy is for new Green Infrastructure and landscaping to be sympathetically integrated into development to ensure the continuation of Sir Frederick Gibberd's master plan and, therefore, contribute to enhancing and conserving the historic environment.
- 13.55 There are opportunities for development to create, protect and enhance existing Green Infrastructure and landscaping, to improve the natural environment, and create additional wildlife habitats and reinforce existing green links. This policy aims to protect existing Green Infrastructure in Harlow and ensure that new Green Infrastructure is well-planned and effectively managed in the future.

### Implementation

- 13.56 Green Infrastructure is multi-functional natural and man-made urban and rural green space, including parks, playing fields, woodlands, allotments and wildlife corridors, rivers, canals and other bodies of water. At a smaller-scale, it also includes

measures to assist climate change mitigation, such as green roofs, green walls, rain gardens and ponds.

13.57 The adopted Harlow Design Guide Supplementary Planning Document (SPD) should be consulted for guidance on appropriate landscaping for development.

13.58 The Council may require a Management Plan to be submitted, which demonstrates how the future maintenance of the Green Infrastructure and landscaping would be managed, in order to protect its quality and functionality in the long-term, including, where appropriate, the protection and recovery of priority habitats and species.

## PL9 Biodiversity and Geodiversity Assets

Development should contribute to and enhance biodiversity or geodiversity assets, to ensure a net gain in biodiversity.

The potential harm caused by development on these assets and their surroundings will be assessed based on the harm caused by the development. The greater the significance of the asset, the greater the weight that is given to the asset's protection. Distinction will be made between the hierarchy of international, national and locally designated and non-designated sites so that the level of protection afforded is consistent with their status.

Development must meet the following criteria:

- (a) it conserves and enhances existing biodiversity and geodiversity assets;
- (b) where (a) is not possible, it includes appropriate and effective measures to mitigate the negative effects on existing biodiversity and geodiversity assets;
- (c) where there is a residual impact, it includes provision for compensatory measures to be secured off-site;
- (d) it creates new biodiversity and creates links to existing biodiversity and geodiversity assets.

### Justification

13.59 As a planned New Town, Harlow benefits from networks of open spaces which contribute to the biodiversity of the district, conserve habitats of local significance and provide opportunities for people to enjoy nature.

13.60 Helping to protect and enhance biodiversity is one of the fundamental aims of national planning policies and guidance, to achieve a net gain in biodiversity. This policy aims to ensure the continued protection and enhancement of biodiversity and geodiversity assets in Harlow.

## Implementation

- 13.61 Designated biodiversity and geodiversity assets are allocated on the Policies Map. In Harlow, the highest order asset type is Sites of Special Scientific Interest, followed by locally designated sites (Local Wildlife Sites and Local Nature Reserves), ancient woodland, and aged or veteran trees found outside ancient woodland. There are, as yet, no designated geodiversity assets in Harlow.
- 13.62 The Council will seek to protect and enhance non-designated assets of biodiversity and geodiversity importance, identified in Evidence Base studies, to extend the geodiversity and the network of biodiversity and open spaces across the district.
- 13.63 If the richness of biodiversity evident at a non-designated asset increases sufficiently, it may become formally declared as a designated asset, such as a Local Wildlife Site or Local Nature Reserve. Information of any such declarations would be made available on the Council's website.
- 13.64 The Council may require assessments of biodiversity and geodiversity assets to be submitted, which identify the impacts of development and any necessary mitigation and/or compensatory measures, and consider the presence of invasive, non-native species and their management, including biosecurity measures and the eradication of invasive species. To ensure compliance with national biodiversity policy and legislation, applicants are advised to refer to the Essex Biodiversity Validation Checklist (or its successor), available on the Essex County Council website.
- 13.65 Biodiversity assets within development will require appropriate protection, enhancement and/or mitigation measures for the biodiversity assets. Appropriate measures could include management agreements, planning conditions and/or obligations.

## PL10 Pollution and Contamination

All development proposals must minimise and, where possible, reduce all forms of pollution and contamination. For air quality, the acceptability or otherwise of a proposal will be determined with reference to the relevant limit values or National Air Quality Objectives as they relate to human health or biodiversity.

In assessing the acceptability of development, the following criteria and the cumulative effects will be considered:

- (a) noise pollution;
- (b) light pollution;
- (c) air quality (including dust, odour and emissions);
- (d) vibration;
- (e) surface and ground water quality;
- (f) land quality, condition and stability;
- (g) the natural environment;

- (h) the built environment;
- (i) general amenity;
- (j) health and safety of public;
- (k) compliance with statutory environmental quality standards.

The location and type of development and its relationship to the surrounding built and natural environment will be taken into consideration when assessing the acceptability of the impacts.

Where it can be demonstrated that pollution and/or contamination is unavoidable, appropriate measures must mitigate the negative effects of the development.

Where adequate mitigation cannot be provided, development will not normally be permitted.

### Justification

- 13.66 It is important that any potential conflicts arising from pollution or contamination are assessed in order to protect the built and natural environment, including safeguarding local amenity and the health and wellbeing of local residents.
- 13.67 Sir Frederick Gibberd's master plan for Harlow separated residential uses from industrial uses, which were concentrated within a number of employment areas. Consequently the Council will consider whether new uses are compatible with existing uses within an area in order to minimise the risk of pollution and/or contamination.
- 13.68 Development in Harlow has historically been built at a high density. Where new development could have an impact on existing development due to potential pollution or contamination, the Council will give careful consideration to impacts on the amenities of the surrounding area.
- 13.69 In terms of air quality in Harlow, air quality monitoring has been undertaken and there are no areas where the air quality has led to the designation of Air Quality Management Areas. This policy aims to maintain this position in the district.

### Implementation

- 13.70 The Council will require a Preliminary Risk Assessment of land considered to be contaminated to be undertaken and submitted, which identify any existing pollution and/or contamination, and the impacts of the development and any necessary mitigation and/or compensatory measures.
- 13.71 For example, an assessment of light may need to take into consideration the detail of the angles of lights, lighting design, light spillage, luminance levels, height of light columns and proposed hours of use. Mitigation measures could include the use of baffles and appropriate building design to minimise impacts. The Council may also impose conditions to control and manage pollution and contamination levels. Further investigations, assessments, long-term maintenance regimes and validation reports may also be required if land is contaminated.

- 13.72 Where contaminated sites have the potential to mobilise contaminants, or where there is a high-risk development proposal within a vulnerable ground water area, mitigation measures must ensure the risks to groundwater are minimised.

## PL11 Water Quality, Water Management, Flooding and Sustainable Drainage Systems

### 1. Water Management

To minimise impact on the water environment, all new dwellings should achieve the Optional Technical Housing Standard for water efficiency of no more than 110 litres per person per day as described by Building Regulations.

### 2. Flooding

All development proposals will be considered against national policies (including application of the sequential test and, if necessary, the exception test) and against the European Water Framework Directive (or any subsequent equivalent).

Development must follow a risk-based and sequential approach, so that it is located in the lowest flood risk area. If this cannot be achieved, the exception test must be applied and the appropriate mitigation measures must be undertaken.

Development must meet the following criteria:

- (a) it must not increase the risk of flooding elsewhere and must aim to reduce flood risk overall;
- (b) within sites at risk of flooding, the most vulnerable parts of the proposed development must be located in areas of lowest flood risk;
- (c) finished floor levels of development in Flood Zones 2 and 3 should be situated above the 1% (1 in 100 years) plus climate change predicted maximum water level, plus a minimum finished floor level of 300mm above the predicted water level;
- (d) proposed development in Flood Zone 3b must be 'water compatible' or 'essential' development;
- (e) development must be flood resilient and resistant, with safe access and escape routes, and it should also be demonstrated that residual risks can be safely managed;
- (f) any necessary flood protection or mitigation measures should not have an undue impact on nature conservation, landscape character, recreation or other important matters;
- (g) there should be no net loss in flood storage on-site;
- (h) flood flow routes should be configured to enable surface water to drain;
- (i) where necessary, planning permission will be conditional upon the submission and approval of a drainage management strategy that addresses all forms of flood risk.

Development within identified Critical Drainage Areas may, depending on the outcomes of a specific flood risk assessment, be required to contribute to funding for the delivery of appropriate flood alleviation schemes.

### 3. Waste Water and Sustainable Drainage Systems (SuDS)

Development proposals should identify how there is sufficient surface water, foul drainage and treatment capacity which can serve the development. Surface and foul water systems must be separate.

The use of SuDS in all development proposals, including the retrofitting of SuDS, is encouraged and will be supported.

Where SuDS are required, the drainage scheme must meet the following criteria:

- (a) provide the most sustainable option from the SuDS hierarchy;
- (b) achieve multiple benefits including management of flood risk and surface water pollution, amenity and biodiversity;
- (c) achieve runoff rates in line with the guidance of the non-statutory technical standards for sustainable drainage;
- (d) provide appropriate attenuation taking into account climate change;
- (e) provide arrangements for future maintenance and management;
- (f) major proposals should also comply with the principles and standards set out by the Lead Local Flood Authority for SuDS.

### 4. Water Quality

Development must not cause deterioration to water quality, including quality of waterways and other bodies of water, identified Source Protection Zones (SPZ), Aquifers and all other groundwater. Development must aim to improve such water quality.

New development adjacent to water courses should seek to include restoration and deculverting. The culverting of water courses should be avoided. Where the applicant can demonstrate that deculverting or other river enhancements are unfeasible, a financial contribution will be sought to restore another section of the same watercourse.

New development adjacent to designated main rivers must provide and maintain an undeveloped buffer zone, of at least eight metres, to the watercourse. Such development must also include a long-term scheme to protect and enhance the conservation value of the watercourse.

## Justification

13.73 Sir Frederick Gibberd's master plan planned Harlow within the landscape, keeping the valleys free from development and building on the higher ground, therefore helping to prevent major flooding.

13.74 This policy will ensure that the quality of drinking water is maintained, avoiding harmful polluting developments which affect its quality. The requirement for development adjacent to designated main rivers to provide an undeveloped buffer zone will ensure the enhancement and protection of local biodiversity, provide space for flood water and provide access for maintenance. The necessity for a scheme to protect and enhance the conservation value of a watercourse, and to aim to improve water quality, is required by the Water Framework Directive and/or the Thames River Basin Management Plan.

- 13.75 This policy also sets out targets for water management. The Environment Agency's report, *Water Stressed areas – final classification (2013)*, states there is serious water stress for many parts of the east of England including Harlow, both now and in the future. Serious water stress is the result of a large population with high water demands but with limited water availability.
- 13.76 It is therefore appropriate to set a water use target of 110 litres per head per day for residential development, which is approximately 50 litres less than the current Harlow average and 15 litres less than the standard Building Regulations requirements. Developing a house with this target could save 79kg of CO<sub>2</sub> and 15m<sup>3</sup> of water per year per house.
- 13.77 This policy also aims to prevent the risk of flooding in the district. Flood risk is a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.
- 13.78 Surface water flooding is also an important issue and this policy aims to prevent this through the use of SuDS in new developments. SuDS are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. They provide opportunities to reduce the causes and impacts of flooding, remove pollutants from urban run-off at source through natural filtration and combine water management with green space to provide benefits for amenity, recreation and wildlife.
- 13.79 A number of Critical Drainage Areas have been identified based on the results of the Harlow Surface Water Management Plan. The risk of surface water flooding in these areas needs to be reduced and drainage improved.
- 13.80 The requirement that any proposed development in Flood Zone 3b must be 'water compatible' or 'essential' development is in accordance with national guidance and the Strategic Flood Risk Assessment.

## Implementation

- 13.81 Applications for developments involving high risk activities in Special Protection Zones (SPZs) or aquifers must be accompanied by a risk assessment to determine whether the development would pose a threat to water quality and what mitigation measures or management strategy is being put in place to deal with the risk. In terms of water quality, high risk activities include those involving hazardous substances such as pesticides, oils, petrol and diesel.
- 13.82 Meeting the water management target can be achieved by ensuring development makes use of efficient appliances such as efficient showerheads, spray taps and low-flush toilets, recycling grey water, and using natural filtration measures and facilities.
- 13.83 The Water Cycle Study emphasises the importance of non-residential development meeting a level of BREEAM compliance regarding water efficiency. The meeting of

BREEAM 'Excellent' rating for water efficiency in non-residential buildings is, therefore, supported.

- 13.84 Harlow contains a significant number of older buildings which will not be as efficient with water use as modern buildings. Measures to retrofit such buildings to increase their energy efficiency are, therefore, encouraged.
- 13.85 National policies and guidance defines flood zones and the types of development which are considered appropriate and inappropriate. It also provides information on the sequential test for Flood Risk Zones and how to then apply an exception test.
- 13.86 Applicants may be required to submit a site-specific Flood Risk Assessment to the Council in order to assess the flood risk to and from the development site. Applicants should refer to the latest guidance from the Environment Agency and the Department for Environment, Food and Rural Affairs for the most up to date information on Flood Risk Assessment.
- 13.87 To demonstrate that a development will be protected over its lifetime, information must be submitted in the assessment of how users will access the development, how flood risk will be reduced, how any overland flood and flow routes are preserved and what flood defence infrastructure will be in place. Flood warning and evacuation procedures may also need to be put in place.
- 13.88 The risk of flooding can be avoided and reduced by:
- (a) locating new development within areas of lower flood risk through the application of the sequential test for Flood Risk Zones and then applying an exception test in accordance with national policies;
  - (b) ensuring that development proposals in flood risk areas actively manage and reduce flood risk by applying the sequential approach at site level;
  - (c) where possible, the footprint of existing buildings should be reduced;
  - (d) where possible, flood storage should be maximised through the use of Green Infrastructure and by providing level-for-level, volume-for-volume floodplain compensation for development within the 1-in-100-year (plus climate change) extent.
- 13.89 In terms of surface water flooding, the general aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:
1. store rainwater for later use;
  2. use infiltration techniques, such as porous surfaces in non-clay areas;
  3. attenuate rainwater in ponds or open water features for gradual release, including the use of SuDS;
  4. attenuate rainwater by storing in tanks or sealed water features for gradual release, including the use of SuDS;
  5. discharge rainwater direct to a watercourse;
  6. discharge rainwater to a surface water sewer/drain;
  7. discharge rainwater to the combined sewer.

- 13.90 It is expected that space is created for flooding to occur by restoring the functional floodplain, wherever possible, through a reduction of development footprint within Flood Zone 3b.
- 13.91 Water-compatible development and essential development are referred to in this policy. As defined by national guidance, water-compatible development includes flood control infrastructure, sewage transmission and pumping stations, navigation facilities and water-based recreation (excluding sleeping accommodation). Essential development includes essential transport infrastructure which has to cross the area at risk, wind turbines and essential utility infrastructure, such as power stations, which requires the location for operational reasons.
- 13.92 Methods of attenuation include attenuation ponds, filter strips and swales.
- 13.93 When considering whether a drainage system is appropriate for a development, the Council will consider the technical standards produced by DEFRA, design and constructions costs and advice from the relevant flood risk management bodies. When planning SuDS, developers need to ensure their design takes account of the construction, operation and maintenance requirements of both surface and subsurface components, allowing for any personnel, vehicle or machinery access required to undertake this work.
- 13.94 The Council will consult the statutory bodies on drainage systems where it is applicable to do so.
- 13.95 Developers should refer to the Council's Strategic Flood Risk Assessment for further information and advice. Reference should also be made to the Harlow Surface Water Management Plan and the Essex SuDS Design Guide. The Essex SuDS Design Guide provides guidance on local standards for water quality and water quantity from developments and guidance on SuDS design. Developers should also consider national guidance on natural flood management techniques and working with natural processes, which seek to protect, restore and emulate the natural functions of catchments, floodplains and rivers.
- 13.96 All proposed development must engage the actions and measures as specified by the Thames River Basin Management Plan, where feasibly possible and reasonable. Developers should liaise with the Environment Agency on such actions and measures.
- 13.97 Appropriate arrangements for foul water must be identified where the local public sewer network does not have adequate capacity. Developers must demonstrate how any upgrades of the existing sewerage network, to alleviate capacity issues, would be delivered in advance of the development. New development must connect to mains foul drainage, but a foul drainage assessment may be required if non-mains foul drainage is proposed.

## PL12 Heritage Assets and their Settings

Development that affects a heritage asset or its setting will be considered against national policies. Based on the effects caused by the development on the significance of the heritage asset, the greater the significance of the asset, the greater the weight that is given to the asset's conservation. The level of impact caused to the significance of the heritage asset will be assessed on the following criteria:

- (a) the impact of development on the character, appearance, or any other aspect of the significance of the asset or its setting;
- (b) the design quality of the development and the extent to which it safeguards and harmonises with the period, style, materials and detailing of the asset (including scale, form, massing, height, elevation, detailed design, layout and distinctive features);
- (c) the extent to which the development is sympathetically integrated within the area and any distinctive features (including its setting in relation to the surrounding area, other buildings, structures and wider vistas and views);
- (d) the extent to which the development would enhance, or better reveal, the significance of the heritage asset;
- (e) any public benefits of the development.

Where development affects a heritage asset or its setting, a Heritage Statement must be submitted to conserve and enhance the asset and its setting.

Where proposals affect or are adjacent to sites of known or suspected archaeological interest a desk-based or field evaluation should be submitted.

Where the heritage asset is at risk and the development would conflict with other policies of the Local Plan, it must be demonstrated that the development represents the asset's optimum viable use and is necessary to secure the future conservation of the asset and that any negative impacts are outweighed.

### Justification

13.98 The purpose of this policy is to protect the significance of heritage assets. This also includes any buildings or structures within the curtilage or wider setting of a heritage asset and which contribute towards its significance.

13.99 National policies highlight the importance of these assets as irreplaceable resources. They are part of the historic environment which contributes strongly to the character and distinctiveness of places; bringing wider social, cultural, economic and environmental benefits to local communities and providing enjoyment to the wider public.

13.100 Harlow contains several Scheduled Monuments including a number of historic moats and burial mounds, earthwork remains of medieval villages, a barn, a chapel and remnants of Roman villas and temples. The district has a rich historical past and

contains various archaeological remains, which were preserved throughout the development of the New Town.

13.101 Harlow contains one Historic Park and Garden recorded on the national statutory register of historic parks and gardens, the Gibberd Garden. This is to the east of the district and was previously owned, developed and maintained by Sir Frederick Gibberd. The gardens and the house are located within the Stort Valley to the east of Harlow.

13.102 Development which would conflict with other policies of the Local Plan may be considered appropriate where the ongoing conservation of a listed building or locally listed building is at risk, and in this instance it must be shown that this is the only way to conserve the asset by providing an income for the upkeep and repair. Such development will not be justified on the basis that it will generate increased revenue or property values.

## Implementation

13.103 Designated heritage assets include listed buildings, curtilages of listed buildings, conservation areas, Scheduled Monuments and Registered Parks and Gardens. Such assets, except Conservation Areas, are administered by Historic England. Non-designated assets include Locally Listed Buildings, monuments, sites, places, areas or landscapes which a Local Authority deems to have special historic or architectural interest.

13.104 National policies and guidance outline the rationale behind the designation of heritage assets, with special architectural or historic interest being at the core of any designation decision. Proposals for enabling development would be assessed having regard to Historic England's latest guidance on enabling development. National policies also set out the hierarchy of significance of historic assets.

13.105 The Council will consult with Historic England on development which would affect Grade II\* or Grade I listed buildings or their settings, as well as other developments as indicated in national guidance. Other bodies, such as Essex County Council, may also be consulted to obtain specialist advice on heritage assets.

### *Listed and Locally Listed Buildings*

13.106 Harlow has over 150 listed buildings. The Department for Culture, Media and Sport designates listed buildings and Scheduled Monuments. Locally listed buildings have also been identified as they contribute towards the district's historic environment.

13.107 A national register of listed buildings is maintained by Historic England and available online. The Council maintains a register of locally listed buildings which is also available online. This may alter during the Local Plan period. Any updates to the list, including the removal or addition of buildings and structures, will be published on the Council's website.

- 13.108 Where planning permission is required for alterations or additions to listed and locally listed buildings, a Heritage Statement should be submitted assessing how the proposal complements or mitigates any harm towards a building's historic character and/or architectural interest. A Heritage Statement must also be submitted for Listed Building Consent applications. For proposals which affect a Grade I or II\* listed building or structure, the Council will also seek advice from Historic England.
- 13.109 As well as assessing the effect that development would have on the physical features of a listed or locally listed building/structure, this policy will also assess the impact the proposal will have on the asset's setting. The term 'setting' refers to the surroundings in which a building or structure is located, and may therefore be more extensive than its curtilage. Setting is often expressed by reference to visual considerations, although the way in which a building or structure is experienced in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses, and by understanding the historic relationship between places.
- 13.110 When assessing applications for development which may affect the setting of a listed or locally listed building or structure, consideration will be given to the implications of cumulative change which may materially impact on the significance of the building or structure, its economic viability and its conservation.

### *Conservation Areas*

- 13.111 The district's ten Conservation Areas are allocated on the Policies Map and have been designated because of their special interest. This policy ensures that development in Conservation Areas respects the character, appearance and features which justify the special designation of that area. This is also applicable to development which affects the setting of a Conservation Area. The Council will encourage redevelopment and refurbishment that would enhance a Conservation Area and its setting.
- 13.112 The Council has completed character appraisals and management plans for several of the district's Conservation Areas. This is part of an ongoing monitoring and review process. Supporting statements accompanying an application should set out how development proposals have considered these character appraisals and how they have accorded with management plans. The appraisals, plans and confirmed Article 4 Directions are available on the Council's website.

### *Archaeology*

- 13.113 A desk-based assessment, or where appropriate an archaeological field evaluation, must be submitted where proposals are on or adjacent to sites of known archaeological interest or sites believed to possess potential archaeological significance. Following the assessment, further investigation may be required.
- 13.114 Where the loss of the whole or a part of a heritage asset's archaeological significance is justified, planning conditions will be attached to a planning permission to ensure that an adequate record is made of the significance of the heritage asset before it is lost.

## PL13 Advertisements

The acceptability of proposals for advertisements will be assessed on the following criteria:

- (a) the effect the advertisement may have on the general amenity of the area, including the historic environment, and the presence of any features of landscape or cultural significance;
- (b) the position of the advertisement in comparison to the scale and size of the host building;
- (c) the cumulative effect of the development when read with other advertisements on the building or in the surrounding area. The clutter or over-concentration of advertisements must be avoided;
- (d) the size, illumination, scale, dominance and siting of the advertisement and how it relates to the scale and character of the surrounding area;
- (e) the design and materials of the advertisement, or the structure containing the advertisement, and its impact upon the appearance of the building on which it is to be affixed and the character of the surrounding area;
- (f) the size, scale, type and levels of illumination of the advertisement and its impact upon the amenity of people living nearby and the potential for light pollution;
- (g) the impact upon the safety of the public, including highway users.

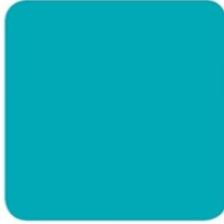
### Justification

13.115 Advertisements can contribute significantly to the character of an area and, without proper management, can create clutter and an unattractive street scene in the built environment. However, advertising is an important way of promoting businesses and contributing to the vitality of the area. The intention of this policy is, therefore, to manage advertisements in a consistent manner, taking into consideration any impact on the amenity value of the area and the safety of the public.

### Implementation

13.116 This policy will apply to proposals which require the express consent of the Council. The Town and Country Planning (Control of Advertisements) Regulations 2007 sets out where express consent is required.

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**DEVELOPMENT MANAGEMENT**  
**14. Housing**



## 14. HOUSING

### Introduction

- 14.1 One of the main aims of the Local Plan is to ensure that there is a sufficient supply of sustainable, high-quality homes across a range of tenures and types in the district, to fully meet Harlow's Objectively Assessed Housing Need (OAHN).
- 14.2 The West Essex and East Hertfordshire Housing Market Area (HMA) includes the administrative areas of Harlow, East Hertfordshire, Epping Forest and Uttlesford. Harlow's contribution to meeting the housing requirement of the HMA is to ensure that 9,200 homes are delivered in Harlow over the Local Plan period. The overarching housing need for the district and its distribution is set out in the Strategic policies.
- 14.3 This chapter and the policies contained within it will help deliver the following Corporate Priority:
- **More and better housing**

### Local Plan Strategic Objectives

- 14.4 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 4 - Identify sites to meet local housing needs both now and in the future**
  - **Objective 5 - Provide a range of suitable housing for the community including a range of tenure and type**
  - **Objective 6 - Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates**
  - **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

# H1 Housing Allocations

Development of the Strategic Housing Site East of Harlow (allocated in Policy HS3) and other sites for housing (allocated in Policy HS2) will be supported.

Development of the Strategic Housing Site East of Harlow will require a Strategic Master Plan to be submitted which takes into consideration the relevant policies in the Local Plan.

Development of all allocated housing sites must be in general conformity with the appropriate guidance, including the Harlow and Gilston Garden Town Vision and Design Guide.

## Justification

- 14.5 The housing requirement for the district is set out in Policy HS1. Sites allocated within the district are important as they help contribute towards meeting the identified housing requirement for the district; consequently such development will be supported.

## Implementation

- 14.6 Planning applications for the development of allocated sites in the Local Plan will be supported.
- 14.7 The housing requirement for the district will be delivered by the sites allocated on the Policies Map. Development of the Strategic Housing Site East of Harlow must be supported by a Strategic Master Plan and may require other documents such as design codes or development briefs. These documents must take into account connectivity, the character of the site and surrounding areas, and the location and delivery of key infrastructure.

*Chapter continues on next page.*

## H2 Residential Development

Residential development, including infill development, the sub-division of garden plots, minor redevelopment schemes and the development of vacant plots, must meet the following criteria:

- (a) the development would not have an unacceptable adverse effect on the character of the locality, the appearance of the street scene, or the amenities enjoyed by the occupiers of neighbouring dwellings;
- (b) off-street parking and access arrangements can be provided for both existing and proposed dwellings, in accordance with the adopted Harlow Design Guide Supplementary Planning Document (SPD) and adopted Vehicle Parking Standards;
- (c) the development would make adequate provision for refuse storage and collection;
- (d) the development would not prejudice the potential for comprehensive development of adjacent land.

### Justification

14.8 This policy aims to encourage new residential development on appropriate sites throughout the district. It also recognises there has been a small but constant supply of new housing built on infill sites and garden plots which has contributed to meeting local housing need.

14.9 This policy also aims to ensure that land suitable for residential development does not have an adverse impact on the amenities and character of an area. This is especially important in Harlow given the district's New Town historic environment reflecting high-density development in parts of the district; however there are areas of lower density development which have their own distinct character.

14.10 As outlined in the adopted Harlow Design Guide SPD, residential development should respect and respond to the character of existing surrounding housing. This character is normally defined by the general style of development, plot widths, how the plot relates to other buildings, rooflines, projections and other design features.

14.11 The consideration of the impact of infill or other minor residential development on parking and access is also a particularly important issue for Harlow, as many of the neighbourhoods were built at a time before high car usage, so on-street parking can cause congestion in narrow residential streets.

### Implementation

14.12 Where there are groups of gardens that might be more efficiently developed together, it would not make best use of land if this potential is prejudiced by a development of one garden in isolation, so such development would not be supported.

## H3 Houses in Multiple Occupation

The creation or conversion of a dwelling to a House in Multiple Occupation (HMO) must meet the following criteria:

- (a) the number of HMOs would not exceed one out of a row of five units;
- (b) it is supported by a design rationale based on an understanding and analysis of local context and character taking into consideration the adopted Harlow Design Guide Supplementary Planning Document (SPD);
- (c) the development makes adequate provision for refuse storage and collection;
- (d) parking is provided at a level of one space per bedroom, plus one secure covered cycle space per bedroom, or set at the current adopted parking standards;
- (e) effective measures are proposed to minimise the effects of noise and disturbance.

The effectiveness of this policy and the one-in-five restriction should be reviewed two years after the adoption of this Local Plan.

### Justification

14.13 HMOs provide an additional housing type which helps meet the needs of the community and provides more choice and mix. It is recognised, however, that HMOs can create a range of issues which cumulatively impact on the surrounding area. Evidence suggests that an excess of HMOs along a street can have a detrimental impact on the amenities of the area. This policy aims to minimise the loss of larger family housing, which is often used for HMOs and is in relatively short supply due to the type of housing stock originally built in Harlow.

14.14 Many areas of Harlow have limited off-street parking and open frontages, which reflect the original New Town design. The intensification of HMOs in a street can have a detrimental impact in the neighbourhood because of a lack of parking provision. As such, this policy aims to maintain the character of residential areas, protect the amenities of local residents and ensure sufficient off-street parking is provided.

### Implementation

14.15 HMOs are defined as dwellinghouses which are inhabited by three or more unrelated people, as their only or main residence, who share one or more basic amenity (such as a kitchen). There are two types of HMOs:

- small HMOs, housing between three and six unrelated persons; and
- large HMOs, housing more than six unrelated persons.

14.16 Current national permitted development rights allow the change of a dwellinghouse to a small HMO without planning permission. The change of a dwellinghouse (or a small HMO) to a large HMO does, however, require planning permission.

- 14.17 Planning applications for HMOs will be assessed according to their impact on the character and street-scene of the area in which they are situated. A row is defined as five or more adjacent dwellings whose frontages face the same continuous section of highway between junctions. A row may include, but is not limited to, terraced, semi-detached and detached dwellings, as interpreted by the Council.
- 14.18 The Council will ensure that such development will be of an acceptable and safe standard and that habitable rooms comply with the latest minimum size codes. Applicants should satisfy themselves that they have obtained the relevant consents and licenses from the Council before commencement.

## H4 Loss of Housing

The demolition or the change of use of buildings or land in residential use must meet the following criteria:

- (a) the development would facilitate a net gain in residential accommodation, or redevelopment at a higher density;
- (b) the development would be necessary to secure the preservation of a listed building at risk;
- (c) the existing building is unfit for human habitation, and cannot be viably improved and brought back into residential use;
- (d) the development would be essential for facilitating development in conjunction with policies in the Local Plan.

### Justification

- 14.19 This policy aims to protect existing habitable housing stock and prioritises the redevelopment of existing buildings for continued residential use, which contributes to meeting the housing need in Harlow. It also helps to minimise the amount of development on greenfield sites by promoting the retention of existing dwellings, thereby assisting to preserve the open spaces in Harlow which are fundamental to its character.
- 14.20 In some cases, redevelopment or conversion of existing dwellings may yield a net increase in dwelling supply, or may provide opportunities to facilitate redevelopment in an area.

### Implementation

- 14.21 The redevelopment of existing residential development, in appropriate cases, will be supported if it results in an increase in housing provision on a site.
- 14.22 To assess if a dwelling is fit for habitation, regard must be given to a range of factors, including general repair, stability, freedom from damp, natural lighting, water supply, ventilation, drainage and sanitary conveniences. This list is not exhaustive and the Council has the discretion to consider other factors.

## H5 Accessible and Adaptable Housing

To ensure that new homes are both accessible and adaptable to meet the changing needs of occupants:

- (a) all new dwellings should be at least Building Regulations Part M4(2) standard for accessible and adaptable homes; and
- (b) in major residential development, a suitable proportion of Building Regulations Part M4(3) standard dwellings for wheelchair users should be provided based on the latest Strategic Housing Market Assessment (SHMA) or other appropriate evidence directly related to the housing needs of Harlow.

The provision of specialist housing developments will be supported on appropriate sites that will meet the needs of older people and other groups.

Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy will new development be exempt from these requirements.

### Justification

14.23 National planning guidance states that a policy requiring wheelchair accessible dwellings should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Consequently, the Council will negotiate a proportion of wheelchair adaptable (market and affordable housing) and/or wheelchair accessible (affordable housing only) dwellings, as appropriate, based on the latest Strategic Housing Market Assessment (SHMA) or other additional appropriate evidence directly related to Harlow's housing needs.

14.24 National planning policies require Local Plans to support Building Regulations by demonstrating the need for requiring accessible dwellings. This is supported by the Joint Strategic Needs Assessment for Essex.

14.25 The Building Regulations, published in 2015, set out three categories of dwellings:

- Part M4(1): VISIBLE dwellings (all properties must be broadly accessible)
- Part M4(2): Accessible and adaptable dwellings
- Part M4(3): Wheelchair user dwellings

14.26 The SHMA (2015) projects that the number of over 65s in the Housing Market Area (HMA) will increase by approximately 47,200 people during the Local Plan period, including 23,300 aged 85 or over. Government disability data indicates that the proportion of households with at least one wheelchair user will increase during the Local Plan period. To provide for these needs, it is necessary to ensure that all future housing is flexible to meet people's changing circumstances. In addition, the SHMA sets out that 10% of market housing and 15% of affordable housing must be Building Regulations Part M4(3) standard.

- 14.27 Harlow has an ageing population, which has important implications for the future delivery of housing over the Local Plan period. Essex County Council (ECC) is the provider of social care in Harlow. ECC's approach to Independent Living (Extra Care) encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. For Harlow, the evidence base (the Housing LIN SHOP@ tool) predicts a need for 104 units of Extra Care accommodation (i.e. 'whole market demand') in addition to the current Extra Care provision in the district. This provision is in addition to the requirement for other specialist accommodation such as sheltered housing.
- 14.28 It is ECC's intention to facilitate the development of at least one 60 unit Extra Care scheme in the next five years in Harlow to meet Adult Social Care demand in the district. In addition to the Evidence Base mentioned previously, ECC will be publishing an updated Market Position Statement in 2019 setting out its intentions for the provision of Extra Care across the county, which will also inform this Local Plan. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care across the county. Extra Care schemes are part of a wider accommodation pathway to enable older people to remain as independent as possible, with the right housing and support to meet their needs.

## Implementation

- 14.29 The Building Regulations Part M4(2) and Part M4(3) dwellings in a development should be identified in planning applications. Part M4(2) of the Regulations sets out the standards for accessible and adaptable homes, and Part M4(3) sets out the standards for wheelchair user dwellings. To ensure these standards are met, applicants should consult with the Council prior to the submission of a planning application.
- 14.30 The proportion of major residential development which is required to be of Building Regulations Part M4(3) standard is set out in the current SHMA or successor studies.

*Chapter continues on next page.*

## H6 Housing Mix

On new housing developments, an appropriate mix of housing tenures, types and sizes will be expected to be provided, in order to create balanced communities which reflect Harlow's housing needs and local character. To achieve this, developers should take into account the latest Strategic Housing Market Assessment, or other additional appropriate evidence directly related to Harlow's housing needs.

Where appropriate and in accordance with policies in the Local Plan, the following types of housing should be provided:

- (a) affordable housing;
- (b) accessible and adaptable housing;
- (c) self-build and custom-build housing plots;
- (d) community-led housing.

### Justification

- 14.31 The Strategic Housing Market Assessment (SHMA) provides robust evidence to establish and provide information on the appropriate mix of housing and range of tenures needed in the district.
- 14.32 The SHMA indicates that there is a demand for a range of housing types and tenures to meet the needs of different groups within Harlow and to provide a choice, as required by national planning policies and guidance.
- 14.33 The Council is keen to enable and support new and innovative housing products to provide homes for local people. Community-led housing is a way of providing new homes for local people which enables them to have a say on how such a scheme will be developed.
- 14.34 The range of housing types, sizes and tenures is based on the current SHMA (see Fig. 14.1, overleaf) or successor studies.

*Chapter continues on next page.*

Fig. 14.1: Range of housing types, sizes and tenures

MARKET HOUSING			%
Flat	1 Bedroom	170	6.6
	2+ Bedrooms	30	1.2
House	2 Bedrooms	610	23.9
	3 Bedrooms	1,690	66.3
	4 Bedrooms	50	2.0
	5+ Bedrooms	-	-
Total Market Housing		2,550	
AFFORDABLE HOUSING			
Flat	1 Bedroom	100	3.0
	2+ Bedrooms	550	16.4
House	2 Bedrooms	940	28.1
	3 Bedrooms	1,400	41.8
	4+ Bedrooms	360	10.7
Total Affordable Housing		3,350	

## Implementation

14.35 The different types and sizes of housing can include houses and flats, of differing tenures, with varied numbers of bedrooms. This also includes the need for accessible and adaptable housing.

14.36 The Council will support groups of local people in the development of community-led housing.

## H7 Residential Annexes

Development for the provision for a domestic annexe must meet the following criteria:

- (a) it has a clear functional and physical dependence to the principal dwelling;
- (b) it will be subservient to the principal dwelling;
- (c) it is occupied by a relative dependent on the occupier of the principal dwelling, or their carer;
- (d) it is in the same ownership as the principal dwelling;
- (e) it does not involve sub-division of the site;
- (f) sufficient car parking is available to meet the adopted Vehicle Parking Standards;
- (g) to have regard to the character of the existing property and the surrounding area.

### Justification

14.37 The creation, extension or conversion of an outbuilding may provide an opportunity to accommodate elderly or other dependent relatives, whilst allowing a degree of independent living. The provision of residential annexes should remain ancillary to the main dwelling within the residential curtilage. However, the creation of a separate residential dwelling unit could have a detrimental impact of

the character of the surrounding area arising from an intensification of use, and therefore would not be granted planning permission.

## Implementation

- 14.38 The annexe should form part of the same residential planning unit, sharing the same access, parking and garden. The key issue is that the annexe should not become a self-contained dwelling in its own right and a restriction could be imposed to achieve this. The layout, design and relationship to the house will be an important consideration and should be guided by other Local Plan policies and the adopted Harlow Design Guide Supplementary Planning Document (SPD).
- 14.39 Use of existing rooms for additional accommodation would not normally require consent, so long as the person was clearly associated with main occupants (e.g. dependent relative). Pre-application advice should be sought from the Council as to whether a proposed annexe requires planning permission.

## H8 Affordable Housing

In residential developments of more than 10 dwellings, it will be expected that at least 30% affordable housing is provided.

Reduction of this percentage may be permitted for viability reasons. Any reduction or non-agreement between the developer and the Council will require an independent viability assessment.

Affordable housing within a development will normally be provided on-site unless exceptional circumstances should require it to be provided elsewhere with the agreement of the Council. Applicants will be required to submit justification for off-site construction or financial contributions.

Affordable housing provision will be expected to have regard to the recommended tenure mix identified in the latest Evidence Base on housing need and affordable housing products defined in current national planning policies.

Affordable housing will be incorporated into the overall design layout to avoid significant clustering of affordable housing. The design of affordable housing should make it indistinguishable from market housing.

Legal agreements with the Council will ensure that affordable housing benefits, for both affordable rented and intermediate housing, are secured for first and subsequent occupiers and retained as affordable

## Justification

- 14.40 The Strategic Housing Market Assessment (SHMA) (2015) indicates there is a need for 13,600 affordable dwellings over the Local Plan period, equating to an average of 618 dwellings per year for the Housing Market Area (HMA). Specifically for

Harlow, the affordable housing need is 154 dwellings per annum (3,400 affordable homes over the Local Plan period).

- 14.41 The SHMA also shows that a significant number (85%) of affordable housing should be provided as affordable rent, normally provided by a Registered Provider or the Council. The remainder of the affordable housing should be provided as Intermediate Affordable housing at 15% of the total affordable.

### Implementation

- 14.42 The type, tenure and bed-size of affordable housing will be informed by the current version of the SHMA and Viability Study or successor studies.
- 14.43 Affordable housing development should be provided on the application site, which will help ensure a mix of tenures and sizes. There may be circumstances where this is not possible, and in such circumstances, where both the Council and the developer agree, a commuted sum may be acceptable.
- 14.44 The Housing and Planning Act 2016 introduced the requirement for Councils to promote the supply of starter homes. The Act sets out a definition of starter homes and signals the Government's intention to require a proportion of starter homes to be delivered on qualifying sites, the level of which will be confirmed by secondary legislation. The consultation sets out 20% of dwellings on sites larger than 10 dwellings (0.5ha). It also suggests that where the affordable housing requirement is greater than 20%, the remainder of affordable housing can only be met once the requirement of the Act is met. This policy should have regard to this once the regulations have been enacted.
- 14.45 The new Garden Communities in the Harlow and Gilston Garden Town also have an important role in diversifying the existing housing market and supporting economic aims. These sites could provide a wide range of types and tenures of homes, informed by site-specific evidence and ensuring that there is a balanced mix of sustainable and high-quality homes across the West Essex and Hertfordshire HMA.

## H9 Self-build and Custom-build Housing

Housing sites of greater than 50 dwellings must include the provision of fully serviced plots for self or custom build housing within each phase to ensure, as far as possible, the continuous availability of such plots throughout the development.

The number of such plots is to be negotiated on a phase by phase basis given the evidence of the Self-Build Register at the time. The arrangements to secure these plots as part of the planning permission and for their marketing to prospective purchasers are also to be agreed with the Council.

Development of the serviced plots must commence within one year of the completion of the related phase of the allocated site. If the serviced plots have not commenced within

this timeframe, they may revert to conventional development and marketing. Proof of adequate marketing of the plots to those on the self-build register will be required.

All plots for self-build or custom-build housing must be fully serviced.

Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy will new development be exempt from this requirement.

The provision of such plots on sites of less than 50 dwellings will also be encouraged.

## Justification

- 14.46 There is a legal requirement to keep a register of people seeking to acquire land to build a home. Such housing can make a contribution to the affordable element of the housing requirement and the overall need in the district. The Council is, therefore, required to grant sufficient development permissions in respect of serviced land to meet the demand.
- 14.47 The proportion of self-build plots on sites of 50 dwellings is considered to be an appropriate level to meet the needs of those on the statutory Self-Build Register. If this proportion would not be achievable, developers will be required to submit a viability appraisal to show that the inclusion of such plots will render the scheme unviable.
- 14.48 This policy recognises that there may be self-build plots which are not developed and remain vacant, in which case the land owner may revert to conventional delivery of the site.

## Implementation

- 14.49 This policy will be delivered through the approval of individual planning applications and through conditions on planning permissions to secure the self-build plots for a period of two years.
- 14.50 Policy H6 identifies that developers must provide self-build and/or custom build housing as part of the dwelling mix. The Council encourages developers and land owners to consult the Council to establish the current demand for self-build and custom-housebuilding and meet that demand accordingly.

*Chapter continues on next page.*

## H10 Travellers' Pitches and Plots

If evidence indicates there is a need for additional pitches or plots, new sites must meet the following criteria:

- (a) the development would not have an unacceptable adverse effect on the character of the locality, the appearance of the street scene, the amenities enjoyed by the occupiers of neighbouring dwellings, biodiversity or geodiversity assets, or Other Open Spaces;
- (b) the development would make adequate provision for refuse storage and collection;
- (c) the development would not prejudice the potential for comprehensive development of adjacent land;
- (d) the development would be within a reasonable distance of shops, schools, healthcare and community/leisure facilities;
- (e) there would be no risk of land contamination or flooding;
- (f) safe and convenient vehicular access to the local highway network would be provided together with adequate space to allow for the parking and movement of vehicles;
- (g) essential services (water, electricity and foul drainage) would be available on-site;
- (h) plots for Travelling Showpeople should be of sufficient size to enable the storage, repair and maintenance of equipment;
- (i) intended occupants would meet the definition of Traveller as set out in national policies.

### Justification

14.51 Policy HS4 identifies the restoration of pitches at the Fern Hill Lane site to fulfil the need for the Travelling Community in Harlow over the Local Plan period. Where further evidence demonstrates additional provision is required, this policy sets out the criteria against which proposals will be assessed.

14.52 This policy aims to ensure that all sites have good access to education, health and welfare services, are safe and that there are no adverse impacts on the land, the locality and the amenities of adjoining occupiers. This policy also seeks to prevent development prejudicing the potential for comprehensive development of adjacent land.

### Implementation

14.53 This policy will apply to applications for new sites where there is a proven need for additional pitches and plots for Travellers.

14.54 When identifying whether community facilities are within a reasonable distance, it is considered that a 400 metre radius is acceptable if the site is only accessible by foot. If the site is accessible by public transport, an 800 metre radius will be applied.



**DEVELOPMENT MANAGEMENT**

**15. Prosperity**



## 15. PROSPERITY

### Introduction

- 15.1 The Prosperity policies aim to protect existing employment uses and encourage and support future employment uses in designated areas, and to avoid the loss of overall job numbers in the district. They support start-up and small business units to promote entrepreneurship and economic regeneration across the district.
- 15.2 Harlow's retail centres provide prosperity and employment for residents and visitors and the town and serves as a sub-regional centre for services and facilities across the wider area. The Prosperity policies, therefore, intend to retain and enhance the existing provision in order to maintain Harlow's sub-regional role.
- 15.3 There are several Retail Parks in Harlow which contribute to retail provision in the town. A key priority is to maintain and enhance the role of Harlow Town Centre and, as such, the policies seek to restrict the sub-division of units.
- 15.4 Proposals for retail development and other large attractors of people such as commercial, leisure, entertainment and offices open to the public, will be determined using the sequential approach to their siting. This will ensure that sites in the Town Centre are considered in the first instance, followed by edge-of-centre, then Neighbourhoods, then Hatches, then Retail Parks. Out-of-centre locations will only be considered as a last resort. Development must be appropriate to the function, size and character of the centre in which it would be located.

### Corporate Priorities

- 15.5 This chapter and the policies contained within it will help deliver the following Corporate Priorities:
- **Regeneration and a thriving economy**
  - **Successful children and young people**

### Local Plan Strategic Objectives

- 15.6 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:
- **Objective 7 - Meet the employment needs of the district by diversifying and investing in the district's employment base**
  - **Objective 8 - Secure economic revitalisation and reinforce Harlow's reputation as a key centre for Research and Development**
  - **Objective 9 - Improve educational opportunities and the skills base of local residents**
  - **Objective 10 - Provide a range of shopping needs for local residents and the wider sub-region by regenerating the Town Centre and protecting and enhancing Neighbourhood Centres and Hatches**

- **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

## PR1 Development within Employment Areas

Development in existing Employment Areas, as identified on the Policies Map, will be supported where it is for the provision of offices, research and development, light or general industrial, warehouse or distribution within Use Classes B1, B2 and B8.

Development for Use Classes other than B1, B2 and B8 must meet the following criteria:

- (a) evidence has been provided to demonstrate that the unit has been vacant and actively marketed to the satisfaction of the Council for at least one year and there is no prospect of Use Classes B1, B2 and B8 occupying the unit or any other more suitable alternative sites being available for the proposal;
- (b) the development will materially increase the number of jobs for local residents;
- (c) the development provides a complementary benefit to the employment area or an ancillary benefit to an existing business, and would not have an adverse effect on the overall provision of employment land;
- (d) where the development is for the sub-division of units into smaller units, that the resulting unit is flexible and the division is reversible.

### Justification

- 15.7 Similarly to Ebenezer Howard's plans for Garden Cities, Sir Frederick Gibberd designed Harlow New Town to separate employment areas from residential areas to ensure the health and wellbeing of residents. Sufficient employment areas were allocated to meet the needs of local residents and reduce out-commuting, offering a wide range of jobs to create a well-balanced community. Therefore, this policy aims to maintain and enhance these principles.
- 15.8 In recognition of Harlow residents' employment needs, specific areas have been designated Enterprise Zone status by the Government. Local Development Orders on the Enterprise Zones promote and guide specific employment uses and activities. The Local Development Order for the northern part of the London Road Zone, for example, supports a mix of retail, leisure and employment uses in an appropriate zone with a separate area for research and development and industrial uses. In the future, if it is identified in a regeneration strategy or development brief, other uses will be supported.

### Implementation

- 15.9 This policy sets out a general presumption against the loss of office, industrial or distribution/warehouse uses from the district's allocated employment areas. There may be exceptions to this where proposals support existing employment uses, such as trade counters or training/testing facilities.

- 15.10 Proposals for non-B uses should be accompanied by a planning statement to address all the following:
- (a) details of the existing use and the proposed use and how it operates;
  - (b) limitations of the site including its buildings and land for class B uses;
  - (c) whether investment would enable the site to be used for class B uses;
  - (d) why the proposal cannot be provided in a more suitable location;
  - (e) an assessment of current and potential future market demand for the site, building or premises in question which should reflect current economic trends, future forecasts changes and actual attempts to market the site, building or premises in question; and
  - (f) any other considerations including economic viability.
- 15.11 In reference to criteria (d) above, locations which the Council consider to be more suitable will be determined by the type and scale of use being proposed. For example, a retail use would be located in Harlow Town Centre in the first instance and then to Neighbourhood Areas and Hatches. Marketing of an employment site, as set out in criteria (e) above, must be undertaken by a suitably competent person for at least one year.

## PR2 Development within Neighbourhood Service Areas

Development in the existing Neighbourhood Service Areas, as identified on the Policies Map, will be supported for the provision of offices, light industrial uses and start-up units falling within Use Class B1.

Proposals for Use Class B1 and other Use Classes must not involve the amalgamation of units in Neighbourhood Service Areas into larger units.

For uses other than Use Class B1, the following criteria must be met:

- (a) evidence has been provided to demonstrate that the unit has been vacant and actively marketed for Use Class B1 to the satisfaction of the Council for at least 12 months or for an appropriate period of time agreed with the Council;
- (b) there is no realistic prospect of Use Class B1 occupying the unit or any other more suitable alternative sites being available for the proposal.

### Justification

- 15.12 The district's Neighbourhood Service Areas provide important employment provision at the neighbourhood level and are well suited to meet the needs of small start-up businesses, with units of approximately 20 to 40 sqm in size being typically available. Such units provide opportunities to accommodate first time businesses and can help to reduce inappropriate business uses proliferating in residential areas, particularly those which affect the amenity of residents.

15.13 The majority of local businesses in Harlow (84%<sup>21</sup>) have fewer than 10 employees and therefore there is a pressing need for starter units, in order to accommodate smaller teams of staff, to reduce overheads and to use space efficiently. This policy aims to protect Neighbourhood Service Areas and the provision of office, light industrial and research.

## Implementation

15.14 This policy sets out a general presumption against the loss of B1 uses. It also encourages more flexible employment accommodation in Neighbourhood Service Areas. Their proximity to retail and residential areas mean that there may be exceptions to this.

15.15 Proposals for non-B1 uses should be accompanied by a planning statement setting out information on the following matters:

- (a) details of the existing use and the proposed use and how it operates;
- (b) limitations of the site including its buildings and land for Use Class B1;
- (c) whether investment would enable the site to be used for Use Class B1;
- (d) why the proposal cannot be provided in more suitable locations;
- (e) current and potential future market demand for the site, building or premises in question which should reflect current economic trends, future forecasts changes and actual attempts to market the site, building or premises in question; and
- (f) any other relevant considerations such as economic viability.

15.16 In reference to criteria (d) above, locations which the Council consider to be more suitable will be determined on the type and scale of use being proposed. For example, a retail use will be better located in Harlow Town Centre in the first instance and then to Neighbourhood Areas and Hatches. Marketing of an employment site, as set out in criteria (e) above, must be undertaken by a suitably competent person.

*Chapter continues on next page.*

<sup>21</sup> Office for National Statistics, 2015. *NOMIS Official Labour Market Statistics*.

## PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas

### 1. Provision of employment floorspace

Employment development outside existing Employment Areas and Neighbourhood Service Areas will be supported where:

- (a) the proposal seeks to redevelop an established employment site, subject to the impact upon the amenity of the surrounding area, highway congestion and movement; or
- (b) the proposed Use Class is B1 office above ground floor level in the Town Centre.

### 2. Loss of employment floorspace

Development resulting in the loss of Use Classes B1, B2, B8 and waste uses will be permitted outside of the district's Employment Areas and Neighbourhood Service Areas where it meets the following criteria:

- (a) the proposed use is of overall benefit to the local community;
- (b) evidence has been provided to demonstrate that the employment use is no longer viable;
- (c) evidence has been provided to demonstrate that the unit or site has been vacant and actively marketed to the satisfaction of the Council for at least 12 months or for an appropriate period of time agreed with the Council, and that there is no prospect of employment uses occupying the unit or site.

## Justification

15.17 Employment Areas and Neighbourhood Service Areas are the main focus of employment provision in Harlow and contain a mix of accommodation for a range of business types.

15.18 Harlow Town Centre also contains a number of office buildings, which not only provide jobs for the local area and beyond, but also reinforce the vitality of the Town Centre by increasing footfall in addition to that associated with day time shoppers and other visitors. Office uses above ground floor and outside of primary retail frontages will, therefore, be encouraged.

15.19 Use Classes B2 and B8 will not be considered appropriate outside of these areas due to their impact on the amenity of an area in terms of general disturbance, noise and vehicle movements.

## Implementation

15.20 There will be instances where the loss of an employment use or the provision of a new employment use outside of strategic employment sites and Neighbourhood Service Areas may be considered appropriate. This policy sets out the criteria for how such proposals will be determined.

## PR4 Improving Job Access and Training

For major development, provision through planning obligations will be sought for:

- (a) employment of local people;
- (b) work related training provision;
- (c) education opportunities; and
- (d) affordable childcare.

### Justification

15.21 This policy actively looks to generate new job opportunities for local residents as a direct result of the growth in the district and to secure regeneration in Harlow. This policy focuses on new job opportunities that the development will create, either as long-term posts or temporary labour, and improving work related training and education. The aim is to get local residents back into work and to improve their skills level.

15.22 Job opportunities may include long-term job creation, temporary job creation through the construction of a development, work experience and placements, apprenticeships and pre-employment training scheme placements. This policy also actively seeks the provision of childcare schemes in employment generating proposals.

15.23 Planning obligations will only be sought where they meet all of the following criteria, namely they are necessary to make development acceptable in planning terms, are directly related to development and are fairly and reasonably related in scale and kind to the development.

### Implementation

15.24 This policy will be applied to major developments and secured through planning obligations, tailored to individual schemes. Applicants should prepare an action plan setting out a schedule of new job opportunities to be created through the proposed development, the process by which jobs will be advertised to local people and the method in which the provision of jobs for local residents will be monitored. For employment generating developments, the action plan should also outline training provision, education opportunities and childcare support. Where possible, the action plan should extend to all sub-contractors.

*Chapter continues on next page.*

## PR5 The Sequential Test and Principles for Main Town Centre Uses

### 1. Sequential Approach to Main Town Centre Uses

Main Town Centre Uses must be directed in the first instance to the Town Centre unless there are no suitable or available sites. Further guidance may be provided within a Supplementary Planning Document (SPD) and/or an approved development brief. Neighbourhood Centres, and then Hatches, must be considered before any Main Town Centre Uses are directed to Retail Park locations.

### 2. General Principles for Main Town Centre Uses

Main Town Centre Uses within the Town Centre, Neighbourhood Centres, Hatches and Retail Parks will be supported where all the following criteria are met:

- (a) the sequential approach is satisfied;
- (b) an active frontage is achieved at the ground floor;
- (c) the vitality and viability of the retail centre is preserved and enhanced to provide facilities and services for local residents; and
- (d) it is well related to public transport facilities, or is located where appropriate provision for sustainable transport can be provided.

### Justification

15.25 The vitality and viability of the Town Centre is important to the local economy and to ensure it is an attractive place for residents, employees and visitors. This is particularly pertinent as the services and facilities available also serve a catchment area that extends beyond the district boundary. The Town Centre is a sustainable transport hub, well-served by public transport, which has good connectivity with key locations along the London Stansted Cambridge Corridor. This policy directs Main Town Centre Uses towards the Town Centre in order to preserve and/or enhance its position.

15.26 In the retail hierarchy of Harlow, subservient to the Town Centre are the Neighbourhood Centres, followed by Hatches, which reflect the principles and hierarchy of the original New Town which ensure different types of retail provision are provided to meet local needs.

### Implementation

15.27 Policy RS1 sets out the hierarchy of retail centres in Harlow and this is the hierarchy in which Main Town Centre Uses should be directed to first before any out of Town Centre sites are considered.

15.28 Proposals for retail and leisure uses outside of the Town Centre which exceed 500sqm in size will be required to be supported by an impact assessment demonstrating that the proposal will not have a negative impact on the vitality and viability of the Town Centre and that the development increases overall

sustainability and accessibility. This is to support the Town Centre's market share and to prevent the decline of the retail offer. This ensures that any potential impacts of retail and leisure uses outside of the Town Centre are fully assessed.

15.29 This policy seeks to maintain active frontages in all retail centres to provide an attractive environment for pedestrians. Active frontages could include display windows, entrance points, façade design or clear glazing. Blank and inaccessible frontages should be avoided.

15.30 In considering proposals in Neighbourhood Centres and Hatches, reference should be made to the adopted Harlow Design Guide SPD and any associated regeneration strategy or development brief.

## PR6 Primary and Secondary Frontages in the Town Centre

### 1. Primary Frontages

Development in the Town Centre primary frontages will be supported where:

- (a) the development is for Use Class A1;
- (b) the development is for Use Classes A2 or A3 and meets all the following criteria:
  - (i) 60% or more of the overall primary frontage length is retained for Use Class A1; and
  - (ii) the site has been vacant and actively marketed for Use Class A1 to the satisfaction of the Council for at least twelve months.

### 2. Secondary Frontages

With the exception of offices at ground floor, Main Town Centre Uses, evening and night-time uses will be permitted in the Town Centre secondary frontages.

## Justification

15.31 Primary and secondary retail frontages protect and enhance the existing retail offer by preventing a proliferation of uses which are not conducive to maintaining the vitality and viability of the Town Centre. Defining frontage lengths and classifying appropriate uses in frontages provide opportunities to regenerate and improve certain parts of the Town Centre and protect retail provision in others.

15.32 This policy supports Main Town Centre Uses, including commercial, leisure, evening and night-time uses in secondary frontages.

## Implementation

15.33 Where marketing of the unit is required to justify a non-A1 use in the primary frontage, it should be undertaken by a suitably competent person for at least twelve months. A planning statement must be submitted setting out how this marketing exercise has been undertaken.

15.34 Within secondary frontages, Main Town Centre Uses will be considered acceptable except for office development which is considered appropriate only on first floor levels and above. This is to prevent blank ground floor frontages in the Town Centre that could harm the vitality of the area. For proposals relating to evening and night time uses, Policy PR11 should also be taken into consideration.

## **PR7 Sub-division and Internal Alteration of Town Centre Units**

The sub-division of retail units in the Town Centre and the internal alteration of existing retail units must meet the following criteria:

- (a) for units larger than 2,500sqm, evidence has been provided to demonstrate that the unit has been actively marketed to the satisfaction of the Council for an agreed period of up to two years to ensure such large units are protected wherever possible;
- (b) the sub-division or internal alteration would retain an active frontage.

### **Justification**

15.35 In order to retain Harlow Town Centre's status as a sub-regional centre, it is important that it is able to provide a mix of retail unit sizes in order to ensure choice and attract a mix of occupiers. This policy aims to retain the Town Centre's larger retail units and to manage the sub-division of these units where it is considered appropriate.

15.36 The 2017 Retail and Leisure Needs Study identified the former department store as providing an opportunity to introduce a new anchor operator in the Town Centre and that the lack of a department store represents a significant gap in the retail offer available in the town. This policy therefore seeks to retain these larger units in order to provide opportunities to attract an anchor store or department store.

### **Implementation**

15.37 In circumstances where sub-division is sought for units above 2,500sqm in size, a marketing exercise must be undertaken by a suitably competent person for a period of at least two years. A planning statement must be submitted setting out how this has been undertaken. This will demonstrate to the Council that the unit has not been able to attract retail operators who are more likely to act as anchors or which provide department store size facilities.

15.38 The threshold of 2,500sqm has been calculated based on an assessment of existing Town Centre units which are considered large enough to accommodate such services or which are located at anchor points in the town i.e. close to high footfall levels and/or interchange facilities.

## PR8 Frontages in Neighbourhood Centres

Development in Neighbourhood Centre frontages, which falls in Use Classes A1, A2, A3, A4, A5, D1, D2, Sui Generis and C3, will be supported subject to the following criteria:

- (a) the development would not result in the loss of key facilities that act as anchors or catalysts which assist in retaining existing or attracting new operators in the Neighbourhood Centre such as supermarkets or public houses;
- (b) 60% or more of the overall frontage length would be retained in Use Class A1;
- (c) for Use Class C3, the development is on the first floor or above.

### Justification

15.39 This policy seeks to support a wider range of services and facilities within Neighbourhood Centres for local residents. These Centres provide services, such as healthcare, places to eat and drink and financial services. It is important that Neighbourhood Centres continue to have a variety of uses to avoid underused frontages and spaces.

### Implementation

15.40 The frontages are mapped in the Appendices. The definition of frontage length and the method by which frontage length will be calculated will be set out in the Council's Authority Monitoring Report (AMR).

## PR9 Development in Hatches

Development in Hatches must meet the following criteria:

- (a) development at ground floor level falls within Use Classes A1, A2, A3, A4, A5, D1 or D2 or a mix of these uses and does not result in the loss of all convenience facilities, public houses and community facilities;
- (b) development on the first floor or above falls within Use Classes B1(a) or C3.

### Justification

15.41 Hatches are a key feature of Harlow's residential areas. They are allocated on the Policies Map and cater for the daily needs of communities within approximately a 400 metre walk of homes. Hatches are usually based around a primary school or local open space and contain around four to five individual retail units, community facilities and public houses which often provide a focus for community activities.

15.42 This policy aims to retain key local facilities which support the vitality and viability of the Hatches. Development proposals that would undermine and erode the function of Hatches would not be supported.

## Implementation

15.43 A number of Hatches now require investment or renewal and for those that have already been regenerated, a mix of uses has been provided as a result, including residential and office space. The Strategic policies provide for comprehensive redevelopment of Hatches.

15.44 This policy supports a diverse mix of uses in the Hatches in order to assist in their regeneration and renewal. However in order to maintain their local service functions and community focus, this policy protects community type facilities. These facilities include public houses, convenience stores such as grocers and butchers, community halls and healthcare facilities.

## PR10 Development in Retail Parks

Development in Retail Parks must meet the following criteria:

- (a) the sequential approach is satisfied;
- (b) the development is in Use Class A1 and is for the sale of bulky goods, or provides leisure activities;
- (c) any sub-division does not result in any separate retail unit being less than 1,000sqm in size.

For sub-division, evidence must be provided to demonstrate that the existing unit has been actively marketed for Use Class A1, to the satisfaction of the Council, for at least 12 months.

## Justification

15.45 National planning policies and guidance set out the need for a sequential test in order to maintain Town Centre vitality and viability. This ensures that where possible, retail and leisure outlets will locate in the Town Centre before being granted permission in an out of town location. The results of the most recent analysis of retail provision in Harlow show that new requirements for retail floorspace should be focused on the Town Centre.

15.46 To promote this principle, this policy ensures that retail units for the sale of non-bulky goods are directed to smaller units in the Town Centre, Neighbourhood Centres and Hatches. This policy, therefore, restricts the sub-division of Retail Park units.

## Implementation

15.47 The term 'bulky goods' can include DIY goods, furniture, hard and soft furnishings, homewares, fabrics, durable household goods, floor coverings, leisure and garden products, motor accessories and electrical goods. Leisure activities include cinemas,

dance halls, gyms and indoor sports centres, but do not include eating and drinking establishments. These definitions are not exhaustive.

- 15.48 This policy supports the sub-division of existing units in the Retail Park subject to the sub-division not resulting in a separate unit being less than 1,000sqm. It is considered that this figure would allow larger units to be divided whilst still having the flexibility to offer space for bulky goods and mitigating the impact on the Town Centre's viability and vitality from the sale of non-bulky goods.

## PR11 Evening and Night Time Economy

### 1. Sequential Test

Evening and night time uses must be directed to the Town Centre first, then to Neighbourhood Centres and then to Hatches, and applicants must demonstrate that this sequential approach has been undertaken.

### 2. Development Principles

Evening and night time uses must meet the following criteria:

- (a) it can be proven that the development will have a positive effect on the vitality and viability of the retail centre, its night-time economy and the local area;
- (b) mitigation through legal agreements or conditions to minimise negative impacts of the development on the local area.

### Justification

- 15.49 The evening and night time economy is important to wider regeneration objectives, employment creation and maintaining and improving the quality of life for residents and visitors.

- 15.50 There are many benefits to promoting such activities. The leisure and entertainment industry provides employment, in particular for young people. A busy, vibrant Town Centre, in both the daytime and evening, can improve the quality and ambience of the Town Centre, and improve wider public perception to secure investment.

- 15.51 Where there may be potential negative impacts associated with evening and night time uses, the Council will seek to mitigate this through legal agreements or conditions to ensure the development does not lead to significant problems such as crime, anti-social behaviour, litter and noise nuisance.

### Implementation

- 15.52 Evening uses include drinking establishments, restaurants and pubs that are open in the evening. Late night uses include night clubs and drinking establishments which are often open beyond midnight. This list is not exhaustive and the Council has the discretion to determine what constitutes evening and late night activities.

- 15.53 The location of evening and night time establishments will be considered carefully and would only be permitted where they would not give rise to unacceptable amenity and environmental impacts which could not be overcome by the imposition of conditions. Where necessary, planning permission will be granted subject to conditions restricting opening and/or removing permitted development rights to change to alternative uses, in order to protect the amenity of surrounding occupants and the viability and vitality of the area generally. The location of the proposal must also comply with Policy PR6.
- 15.54 In terms of noise, an impact assessment may be required, taking into account the context of the site, in particular its proximity to existing residential developments.



**DEVELOPMENT MANAGEMENT**  
**16. Lifestyles**



## 16. LIFESTYLES

### Introduction

- 16.1 These policies aim to enhance and, wherever possible, retain the district's recreational, sporting, cultural and community facilities and services which contribute towards improving the health and lifestyles of residents.
- 16.2 There is also a policy to support the provision of public art to maintain Harlow's status as a Sculpture Town and to improve the environmental and cultural quality of the district.

### Corporate Priorities

- 16.3 This chapter and the policies contained within it will help deliver the following Corporate Priority:

- **Wellbeing and social inclusion**

### Local Plan Strategic Objectives

- 16.4 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objective:
- **Objective 11 - Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**
  - **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents**

# L1

## Open Spaces, Play Areas, Allotments and Sporting Provision and Facilities in Major Development

In major development and depending on demonstrable need, public open space, play space, allotments and sporting facilities are required to be provided (or upgraded in the case of existing facilities), along with their ongoing management and maintenance.

### Justification

- 16.5 National planning policies and guidance place emphasis on the important contribution that high quality open spaces can make to the health and wellbeing of communities.
- 16.6 One of the fundamental aims of Sir Frederick Gibberd's master plan for Harlow was to ensure the district was designed with sufficient areas of multi-functional open space, located close to residential areas to which residents have easy access. These spaces form part of the Green Infrastructure in Harlow and offer a range of formal and informal activities. The Green Infrastructure network provides well-connected footpaths, cycleways and bridleways which can be used by visitors and residents, thereby encouraging sustainability and promoting healthier lifestyles.

### Implementation

- 16.7 The adopted Open Space, Sport and Recreation Supplementary Planning Document (SPD) (or successor) and the Harlow Design Guide SPD set out the requirements for the provision and design of open space. Where it can be demonstrated that provision cannot be met on-site, the Open Spaces SPD sets out the method for calculating off-site contributions for alternative provision.
- 16.8 Satisfactory long-term management and maintenance arrangements must be secured as part of the planning permission. This may include the creation of a management company, a maintenance plan and/or an agreed commuted maintenance sum.

*Chapter continues on next page.*

## L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities

### 1. Development for the provision of recreational, sporting, cultural and community uses and facilities

Development for the provision of recreational, sporting, cultural and community uses and/or facilities will be supported where it meets the following criteria:

- (a) there is evidence of a demonstrable need for the use and/or facility or a benefit to the local community;
- (b) the use and/or facility is easily accessible by all sectors of the community by both public and private transport;
- (c) the development would redress the deficiency of recreational provision within the locality.

### 2. Development resulting in the loss of recreational, sporting, cultural and community uses and facilities

Development that will result in the loss of all or part of any recreational, sporting, cultural and community uses and/or facilities will not be supported unless it meets one or more of the following criteria:

- (a) it can be demonstrated that the use and/or facility is surplus to requirements and an alternative replacement is not required;
- (b) replacement uses and/or facilities of equivalent or better quantity and quality are provided in a suitable location before the existing use and/or facility is replaced. The replacement should be provided in an agreed location;
- (c) such a development is ancillary or will support and enhance the existing use and/or facility.

### Justification

16.9 National planning policies and guidance state that in order to deliver recreational, sporting, cultural and community facilities and services the community needs, policies should plan positively and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

16.10 This policy aims to protect the district's recreational, sporting, cultural and community facilities including playing pitches, play spaces, allotments and sporting facilities. It also provides the criteria for which new facilities will be provided.

### Implementation

16.11 Recreation can include formal or informal activities and includes open spaces, play spaces, buildings and other facilities used by people for enjoyment in their free time. Sporting uses/and or facilities include sports pitches and associated buildings.

- 16.12 This policy also considers a range of different community and cultural buildings and uses, including places of worship, healthcare and education facilities, libraries and social facilities such as community halls. These uses can provide the necessary infrastructure that underpins a healthy and prosperous community, and a range of activities that help to engage and connect the public. These lists are not exhaustive and the Council has the discretion to decide what constitutes recreational, sporting, cultural and community facilities.
- 16.13 Developers may need to satisfy the Council that satisfactory management and maintenance arrangements are in place before planning permission is granted.
- 16.14 Marketing of a use or facility that is surplus to requirements, as appropriate for the condition and existing use of the facility, must be undertaken by a suitably competent person. The Council will determine how long a marketing exercise should be on a case-by-case basis.

## **L3 Development Involving the Provision or Relocation or Loss of Public Art**

### **1. Provision of Public Art in Major Developments**

In major developments, public art should be provided and maintained. The form of public art in each case should be discussed with the Council at the earliest opportunity.

### **2. Development Involving the Provision, Relocation or Loss of Public Art**

The commissioning and de-commissioning of public art must be agreed with the Council.

### **Justification**

- 16.15 Since the designation of Harlow New Town in 1947, the district has been collecting and creating works of art for the enjoyment of the residents and visitors to the district in order to enhance the public realm. Most of the pieces are sculpture based, hence the branding of Harlow as a Sculpture Town. These sculptures are located in public spaces including the Town Centre, Neighbourhood Centres, Hatches, Green Wedges, employment areas and residential areas. Over the years the collection has grown to almost 100 works, giving the town the highest percentage of public sculpture per head of population in the country. Most pieces of art are maintained and owned by the Harlow Arts Trust, although some are owned by the Council or privately through development.
- 16.16 The purpose of this policy is to continue the legacy of Harlow as a town of public art and sculpture and it is expected that major new developments will contribute towards this. This policy will also manage the relocation and loss of public art and will give due consideration to the historic significance of the artwork or its setting. The Council will prepare a Public Art Supplementary Planning Document (SPD) to help guide applicants on the inclusion of public art in their development and what information must be submitted alongside a planning application.

## Implementation

- 16.17 If providing public art in major development would not be achievable or viable, developers will be required to demonstrate this by submission of an independent viability appraisal or report.
- 16.18 Detailed guidance on the provision, relocation and loss of public art will be set out in the Public Art SPD.

## L4 Health and Wellbeing

The Council will seek to deliver development and growth which has a positive impact on the health and wellbeing of residents, and address issues of health deprivation and health inequality in the district in accordance with the objectives of the Harlow Health and Wellbeing Strategy and in response to the various Evidence Base sources.

When promoting development, applicants should consider the impact on the health and wellbeing of new and existing residents, having regard to the following principles:

- (a) infrastructure required to encourage physical exercise, including sport and recreation facilities, walking, and cycling and bridleway routes;
- (b) the provision of accessible open space, Green Infrastructure and landscaping;
- (c) the provision of new or enhanced healthcare facilities, working with the relevant health authorities;
- (d) the location and links between community facilities, homes, education and employment opportunities and sustainable travel options;
- (e) the provision of opportunities to grow food and avoiding unhealthy eating options; and
- (f) good quality design, having regard to the Essex Design Guide, which incorporates active design principles.

Applicants may be required to prepare a Health Impact Assessment to determine the extent of potential health impacts from development proposals and set out appropriate mitigation measures.

## Justification

- 16.19 The Council wants all residents to live in environments that support good health and wellbeing and is committed to ensuring that residents benefit from the positive impacts that development and infrastructure growth can have on health and wellbeing. This is further supported through the outcomes of the Harlow Health and Wellbeing Strategy. Along with policies in the Local Plan as a whole, this policy ensures that development proposals have considered measures that will improve the health and wellbeing of residents and not contribute towards further worsening health issues across the district.

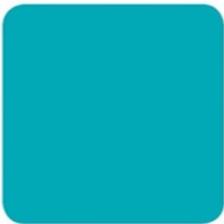
- 16.20 The principles set out in this policy have been informed by the Town and Country Planning Association's Guide 8: Creating health promoting environments, which states that good living environments can have a positive impact on health equalities. This policy has also been developed having regard to health and wellbeing issues identified in Harlow, as evidenced by the Essex Joint Strategic Needs Assessment and Public Health Profiles produced by Public Health England.
- 16.21 The Harlow and Gilston Garden Town partners are also developing a health framework using the NHS Healthy Towns Criteria, which will set out projects or interventions that could be enhanced in proposed developments and other opportunities for improving health and wellbeing across the Garden Town. Once complete it will be endorsed by the Garden Town local authorities and the Health and Wellbeing Boards.

## Implementation

- 16.22 This policy refers to the Essex Design Guide which addresses health and wellbeing through the following sections:
- Landscape and Greenspaces
  - Layout Design
  - Street and Roads
  - Internal Design Details
  - Architectural Details
  - Thematic sections dealing with: ageing populations; digital and smart technology; active design; health & wellbeing itself
- 16.23 The Essex Design Guide, alongside the Harlow Design Guide and the Harlow and Gilston Garden Town Vision and Design Guide, should be used to help design good quality schemes that limit adverse impacts on and promote health and wellbeing in the first instance. These will help ensure that health and wellbeing are addressed at the earliest possible, conceptual / design stage of any development. This is necessary to help enable smoother and timelier progress through the development and planning application process. Accordingly, supporting master-planning work for larger developments will be required to ensure that these matters are addressed from the outset.
- 16.24 Where appropriate, this policy supports the use of Health Impact Assessments (HIA) for certain types of developments. HIAs allow the Council to assess the impact that the proposed development will have on the health and wellbeing of residents. These assessments ensure that the Council can work with developers to optimise the positive impacts on the health and wellbeing of potential development and reduce, remove or mitigate any identified unintended consequences that may arise on health from the submitted proposal.
- 16.25 Applicants should refer to the Essex wide HIA guidance, updated and agreed by the Essex local authorities, which assists in the preparation of HIAs.
- 16.26 This policy also refers to active design principles which have been produced by Sport England in partnership with Public Health England and is embedded in the

Essex Design Guide. Active design is about designing and adapting where we live to encourage activity in everyday lives. It is a combination of ten principles that promote activity, health and stronger communities through built design and is an important consideration for new development proposals.

16.27 To support the Local Plan objective of improving the overall health and wellbeing of residents, the Harlow Health and Wellbeing Strategy and the Essex Joint Health and Wellbeing Strategy will be a material consideration in the determining of planning applications.



**DEVELOPMENT MANAGEMENT**  
**17. Infrastructure**



## 17. INFRASTRUCTURE

### Introduction

- 17.1 The Infrastructure Policies aim to manage the provision of local transport infrastructure in new developments including vehicle, pedestrian and cycle access, and to provide advice and standards for parking and criteria based policies for the provision of broadband and telecommunications equipment and other infrastructure.
- 17.2 The policies aim to promote sustainable transport modes in order to influence travel behaviour and to reduce the carbon footprint of the district. The policies also set criteria for ensuring that developments have suitable access and servicing and are safe and well-connected.
- 17.3 The Local Highway Authority is responsible for maintaining and repairing the highway network, which includes roads, cycleways, footways and the public rights of way network including bridleways and byways. The Highway Authority also protects the highway network for the safe and efficient movement of people and goods. The Council will consult Highways England where proposals affect a motorway or major A road and the Local Highway Authority and, where appropriate, neighbouring authorities on proposals which affect public highways, footways, cycleways, bridleways and Public Rights of Way, and for proposals which cross the administrative boundary.
- 17.4 Essex County Council has prepared several guidance documents and manuals to assist those constructing new highways, footpaths, cycleways and bridleways. These should be read in conjunction with the national policies and guidance documents before submitting development proposals.
- 17.5 The County Council's Parking Standards, which provide guidance on parking provision in new developments, should always be consulted, unless otherwise indicated elsewhere in the Local Plan. It is recognised, however, that parking provision may be reduced in sustainable locations.
- 17.6 Other infrastructure such as education, healthcare, leisure, community uses, utilities and Green Infrastructure are covered by other policies in the Local Plan.

### Corporate Priorities

- 17.7 This chapter and the policies contained within it will help deliver the following Corporate Priority:

- **Regeneration and a thriving economy**

## Local Plan Strategic Objectives

17.8 This chapter and the policies contained within it will help deliver the following Local Plan Strategic Objectives:

- **Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow’s residents**
- **Objective 13 - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities**
- **Objective 14 - Reduce the need to travel by vehicle and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport**
- **Objective 15 - Improve transport links, particularly for sustainable modes of transport, to access all facilities and jobs**

# IN1 Development and Sustainable Modes of Travel

## 1. Sustainable Accessibility

All development should have regard to the modal hierarchy as set out below:

<p><b>TOP</b></p>  <p><b>BOTTOM</b></p>	<ol style="list-style-type: none"> <li>1. Opportunities to reduce travel demand and the need to travel</li> <li>2. Vulnerable road user needs such as pedestrians and cyclists</li> <li>3. Public transport passenger needs</li> <li>4. Powered two wheeler user needs such as mopeds and motorbikes</li> <li>5. Other motor vehicle user needs</li> </ol>
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Major development proposals should identify ways to reduce the use of the car and promote alternative ways to travel and this should be detailed in a supporting Travel Plan.

New developments including redevelopments, changes of use and Town Centre and transport interchange improvements will be required to link to, or provide public transport services which link to, the existing cycleway, footway, public right of way and bridleway network, and, where appropriate:

- (a) provide direct cycleways, footways and bridleways within the development;
- (b) contribute to improving and developing cycleways, footways, public rights of ways and bridleways serving the development;
- (c) provide cycle storage/spaces in accordance with current parking standards;
- (d) provide other facilities for cyclists such as employee showers, lockers and information and maintenance points.

## 2. Provision of Electric Charging Points for Vehicles

Development must provide electric vehicle charging points (EVCPs) in accordance with the latest Government guidance.

## Justification

- 17.9 The provision of sustainable transport modes in the district has a number of positive benefits. Using trains, buses, cycling and walking to access employment, education, services and facilities can help reduce the number of vehicles on the road thereby easing congestion levels and improving the effects of climate change by reducing carbon dioxide and nitrogen oxide emissions. Cycling and walking to services, particularly facilities within a radius of 1 to 8km, can improve public health, physical activity and quality of life.
- 17.10 To enable people to choose more sustainable modes of transport, the services must be safe, secure, adequate, direct, frequent and affordable. Local Plan policies ensure that the options for sustainable modes continue well into the future, and to facilitate this, the Council will bring forward major infrastructure improvements with rail and bus operators and the Local Highway Authority.
- 17.11 This policy provides detailed advice on the provision of appropriate and adequate infrastructure which is necessary to enable those who wish to use walking, cycling and public transport as an alternative way of moving in and around the district as well as improving and protecting the existing bridleway network. It also provides options for providing other sustainability initiatives to reduce the use of the car and to reduce the emittance of carbon dioxide, such as encouraging the use of electric cars through the provision of new charging points.

## Implementation

- 17.12 As highlighted in national planning policies and guidance, applicants for development that generates significant travel movements should submit a Transport Assessment or statement and Travel Plan setting out how the proposal has aimed to meet this policy.
- 17.13 Opportunities should also be sought to collaborate in the development of travel plans and travel planning measures across the wider Garden Town. Applicants should look at the viability of car sharing schemes as well as electric charging points.
- 17.14 For employment developments, the use of shuttle buses and walking and cycling connections should be investigated as well as opportunities to use railway spurs and river channels and canals. New educational facilities should also investigate ways to promote cycling and walking through a school travel plan.
- 17.15 This policy will be applied proportionately to the size of the development being proposed. For example it would not be reasonable to expect proposals for householder developments to provide new footpaths. However all development must consider the modal hierarchy.
- 17.16 Those applications which involve definitive Public Rights of Way, as defined by the Local Highways Authority, should refer to the latest DEFRA guidance on planning permission and rights of way.

## IN2 Impact of Development on the Highways Network including Access and Servicing

Development must meet the following criteria:

- (a) it would not cause a severe residual cumulative impact on highway congestion and movement;
- (b) it would not cause a detrimental impact on the safety of all highway users including pedestrians, cyclists and horse-riders;
- (c) the development provides for adequate, safe and convenient loading and servicing arrangements, access points and drop-off areas and consideration has been given to the movement and turning of emergency vehicles and refuse vehicles.

### Justification

17.17 This policy will be used to determine whether or not the development has an impact on the existing highway network and, therefore, whether the proposal should be considered appropriate in transport terms. It also provides guidelines on the provision of adequate access and servicing for development.

### Implementation

17.18 In accordance with national planning policies and guidance, it may be necessary for an application to be accompanied either by a Transport Assessment (TA) or Transport Statement (TS) depending on the degree of the proposal's impact on highway users and movement in the local area generally. It will be for the applicant to demonstrate that the impact of the development on highway users is either minimal or can be mitigated by appropriate measures.

17.19 These documents assess and mitigate the negative transport impacts of development in order to promote sustainable development. TAs are thorough assessments of the transport implications of development, and TSs are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development. Further guidance on the preparation of TAs and TSs can be found in national planning policies and guidance.

17.20 The Council will consult with the Local Highway Authority and other bodies on the Transport Assessment or Statement. If there is inadequate justification for the proposal or if the impact of the development is too great then it will be refused.

17.21 It is recommended that any TA and/or TS be agreed with the Highway Authority and Highways England (where the development proposal impacts on the trunk road network) prior to submission of the same to the Council.

## IN3 Parking Standards

Vehicle parking must be provided in accordance with the adopted Essex Vehicle Parking Standards, unless otherwise indicated elsewhere in the Local Plan and/or supporting documents.

### Justification

17.22 The 2011 Census revealed that 75% of households in Harlow had access to at least one vehicle. There is a balance between reducing the reliance on the car and promoting more sustainable modes of travel whilst ensuring that on-street parking issues are not created, particularly around key destinations such as strategic employment sites, the Town Centre and railway stations.

### Implementation

17.23 This policy, through reference to the Essex Vehicle Parking Standards, provides a flexible approach to the provision of parking. It allows the Council to secure more spaces in areas that already experience parking problems or accept fewer parking spaces in areas of good public transport accessibility.

17.24 The Essex Vehicle Parking Standards also set out the requirements for adequate parking provision for the needs of disabled people and for bicycles and powered two-wheelers. The flexibility that may be considered appropriate to car parking provision, in locations with good public transport access, does not apply to car parking provision for disabled people. Such provision will not be reduced and any additional provision will be supported. If a reduction in overall parking provision is accepted by the Council then an increase in provision for bicycles and initiatives to support public transport will be expected to be provided.

17.25 There will be some developments that will not fall into any of the Use Class categories set out in the Essex Vehicle Parking Standards. In such cases, the Council will consider the proposal on its own merits in consultation with the Local Highways Authority.

*Chapter continues on next page.*

## IN4 Broadband and Development

### 1. Broadband Provision in Major Development

Developers will be expected to work with broadband service providers to ensure that the provision of future-proofed high speed broadband infrastructure is available, including connections to buildings, and this should be by fibre connection wherever possible.

### 2. Broadband Infrastructure Development

Broadband infrastructure development must meet the following criteria:

- (a) any adverse impacts on the natural and built environment and communities have been minimised;
- (b) opportunities of sharing infrastructure between utilities have been addressed in order to minimise disruption, reduce installation costs and increase the viability of service provision.

### Justification

17.26 The development of high speed broadband technology and other communications networks play a vital role in enhancing the provision of local community facilities and services. High quality communication is also essential for sustainable economic growth and to help attract businesses to the district. The Council is working with Essex County Council to roll out 'Superfast Essex', a programme which will see 95% of Essex having access to high-speed broadband networks by 2019, thereby boosting the economy of the County and enabling businesses to work more effectively in new ways and reach out to new customers.

17.27 'Superfast Essex' does not cover new build properties and therefore Harlow Council needs to ensure that Superfast broadband in new developments is considered at the outset along with other important utility infrastructure provision such as water pipes and gas mains. This is easier to implement during the construction phase rather than retrospectively. The purpose of this policy is to secure the delivery of fibre broadband as part of new developments.

### Implementation

17.28 Major developments will need to provide a strategy that can demonstrate that fibre optic connection can be achieved to the site proportionate to the size of the development.

*Chapter continues on next page.*

## IN5 Telecommunications Equipment

Development of telecommunications equipment must meet the following criteria:

- (a) appropriate evidence has been provided to show that opportunities have been explored to share existing masts or sites with other providers;
- (b) where equipment has become redundant, it is removed before it is replaced, or if not replaced, it is removed within a time period to be agreed with the Council.

### Justification

17.29 Telecommunications networks require the provision of aerials, masts and cables which can cause conflict between the needs of a company to site equipment on operationally advantageous sites and the need to protect sensitive areas. This policy aims to balance the need for expanding communications equipment whilst protecting the district's environment.

### Implementation

17.30 Generally, planning permission is only required for certain sized masts and, therefore, the Council encourages early pre-application discussions on the provision of new telecommunication equipment. This policy will be used to determine equipment which requires planning consent.

17.31 Telecommunication equipment must conform to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines taking into account the cumulative impact of all operators' equipment located on the mast/site where appropriate. Government advice states that all telecommunications proposals should be submitted with an ICNIRP Certificate.

*Chapter continues on next page.*

## IN6 Planning Obligations

Planning permission will only be granted for development if provision is secured for related infrastructure, affordable housing, services, facilities and environmental protection and any other planning contributions which are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

The provision of such requirements shall be secured either as part of development proposals, through the use of conditions attached to planning permissions, or through planning obligations. Where it can be demonstrated that provision on-site is not feasible then provision elsewhere, or a financial contribution towards this provision, will be required.

Where a planning application extends beyond the district boundary, prior agreement for the provision and location of any necessary obligations will need to be obtained from relevant parties.

Where the submission of a viability assessment has been justified, the Council will require an independent review of the viability of the scheme to be prepared, the costs of which shall be met by the developer. Where it is accepted that planning contributions are reduced below the requirements set out in policies of the Local Plan, a viability review mechanism will be required to enable a fully policy compliant level of contributions to be achieved over the lifetime of the project. Other than in exceptional circumstances, viability assessments will be made publicly available.

### Justification

17.32 All development has the potential to impact on the environment and place pressure on local infrastructure and services. The planning system can be used to ensure that new development contributes positively to the local environment and helps to mitigate any adverse impacts on infrastructure.

17.33 Section 106 agreements are a very effective means of ensuring that public services keep pace with private sector development and will play an important role in implementing the Local Plan. They can ensure relevant infrastructure and facilities are provided, the quality of a development is enhanced and schemes are enabled to go ahead that would otherwise be refused planning permission.

### Implementation

17.34 Planning obligations are negotiated on a case-by-case basis. The approach to development viability, including how it should be taken into account in decision making, should be in accordance with national planning guidance. Viability review mechanisms will be considered on an individual basis taking into consideration matters such as the scale and phasing of the development and may be required

both early and late in the development process. Further guidance will be available in an Adopted Planning Obligations Supplementary Planning Document (SPD).

17.35 Development can create a need for the provision of services, facilities and infrastructure both on-site and off-site. This provision may include, but not be limited to:

- (a) affordable housing;
- (b) open spaces and Green Infrastructure;
- (c) communications infrastructure;
- (d) public art;
- (e) community and social facilities;
- (f) transport improvements;
- (g) culture and recreation facilities;
- (h) utility services;
- (i) education and health facilities;
- (j) emergency service requirements;
- (k) measures to protect and enhance amenity or the environment, including biodiversity and wildlife habitats;
- (l) any other infrastructure items identified in the Local Plan.

17.36 Requirements for individual developments will depend on the nature of the proposals, specific site circumstances and on the requirements laid out in any adopted SPDs produced by the Council.

17.37 If the necessary requirements generated through a development cannot be achieved through negotiations or condition, they will normally be secured as planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended) in association with a grant of planning permission.

17.38 In addition to securing necessary infrastructure, services and facilities, planning obligations may involve measures to ensure development takes place in an agreed way, for example, by setting out the appropriate phasing of development, and measures to meet other Local Plan policies and objectives, such as the protection of the environment.

17.39 New development can have wider impacts, such as development generating additional traffic movements outside the district or a larger application straddling the administrative boundary. In these cases, agreement may also be required with the adjoining Council and also Essex and/or Hertfordshire County Councils, as the Highway Authorities, as part of a Section 106 agreement.

**MONITORING AND IMPLEMENTATION**

## **18. Monitoring**



**Harlow Local Development Plan**

# MONITORING AND IMPLEMENTATION

## 18. MONITORING

- 18.1 Monitoring the Local Plan is an important, ongoing activity which identifies how the policies contained in the Plan are being implemented. The Council is required to produce an Authority Monitoring Report (AMR) at least annually. The AMR monitors progress against milestones in the Local Development Scheme and contains an assessment of the extent to which objectives set out in the Local Plan are being achieved.
- 18.2 Where it becomes apparent that objectives and targets are not being met, or if circumstances have changed nationally or locally, this may give rise to a review of the Local Plan or other elements such as Supplementary Planning Documents (SPDs) or additional Development Plan Documents (DPDs).
- 18.3 The monitoring framework for the Local Plan is set out below. This contains a series of performance indicators and other areas on which updates may be given which will be incorporated into the AMR.

Policy Area	Indicator	Target	Monitoring Policies
<b>Housing Strategy and Growth Locations</b>	Net additional dwellings built	Deliver at least 9,200 dwellings on the housing sites under construction, with planning permission and allocated to meet the housing requirement up to 2033  Deliver a rolling programme of housing sites to feed into five-year housing supply	HS1, HS2, H1
	Net additional dwellings built in Strategic Housing Site East of Harlow	Deliver 2,600 dwellings and associated infrastructure on the allocated land to the east of Harlow	HS2, HS3, HGT1
	Number of new Gypsy and Traveller pitches completed	Restore 12 derelict pitches at Fern Hill Lane site	HS4, H10

Policy Area	Indicator	Target	Monitoring Policies
	Number of planning permissions for Houses in Multiple Occupation (HMOs)	The number of planning permissions for HMOs that exceed more than one out of a row of five units, or are refused because of it. A full review of the policy will be undertaken two years after the date of adoption to establish the effectiveness of the policy based on this monitoring and information from HMO licensing	H3
	Net change on existing habitable housing stock	No net loss in habitable housing stock	H4
	Percentage of new dwellings meeting the Building Regulations Part M4(2) Standard for accessible and adaptable homes	100%	H5
	Number of dwellings for wheelchair users under the Building Regulations Part M4(3) standard in major residential development	The proportion set out in the latest SHMA is met	H5
	Type and size of housing in major residential developments	The proportion set out in the latest SHMA is met	H6
	Percentage of Affordable Housing built on new residential development of more than 10 dwellings	At least 30% affordable housing for new residential development of more than 10 dwellings, developed on site, with evidenced tenure mix, indistinguishable tenure and secure legal agreements for future occupancy	H8

Policy Area	Indicator	Target	Monitoring Policies
	Self-build serviced plots	Number of dwellings provided on sites greater than 50 dwellings for serviced plots for self-build, against the required supply. Sites of less than 50 dwellings will also be monitored for this provision	H9
<b>Economic Development and Prosperity Strategy</b>	Net increase in employment land	4.6 ha in Harlow Business Park, The Pinnacles	ED1
		14.2 ha in London Road	
		2.2 ha in East Road, Templefields	
	Net loss of employment land in Strategic Employment Areas and Neighbourhood Service Areas	No net loss	ED2, PR1, PR2
	Change in number of visitors	Increased trend	ED4
	Change in employment floorspace outside Strategic Employment Areas and Neighbourhood Service Areas	No net loss of B1, B2, B8 and waste uses outside Strategic Employment Areas and Neighbourhood Service Areas	PR3
Number of jobs created by the major developments	Increased job numbers overall	PR4	
<b>Retail Ambitions and Town Centre Redevelopment</b>	The Retail Hierarchy in Harlow	Retail development should be directed to Harlow Town Centre in the first instance followed by the retail centres set out in the Retail Hierarchy	RS1, PR5, PR6, PR7, PR8, PR9, PR10, PR11
	Net additional retail floorspace in existing Retail Centres	Provide up to 18,100sqm of comparison floorspace and up to 3,200sqm of convenience floorspace in Harlow up to 2026 and monitor net retail provision beyond 2026 (A1 uses)	RS2, RS1, RS3, PR6, PR1

Policy Area	Indicator	Target	Monitoring Policies
	Evening and night-time uses	Increased trend	PR11
	Percentage of Primary Frontage in the Town Centre in Use Classes A1, A2 and A3	At least 60% of the overall Primary Frontage length is A1 use and 100% retention of primary frontage length	PR6
	Retention of Town Centres units larger than 2,500sqm	No net loss in number of larger retail units in the Town Centre	PR7
	Percentage of overall Frontage length being retained in A1 use in Neighbourhood Centres	Minimum of 60%	PR8
	Number of key local facilities in Neighbourhood Centres and Hatches	No net loss of key local facilities	PR8, PR9
<b>Linking Development Sites to the Wider Environment</b>	Retention of Green Belt, Green Wedge, Green Finger or Other Open Space	No inappropriate development on land designated as Green Belt, Green Wedge or Green Finger, and no loss of Other Open Space	WE1, WE2, PL4, PL5, PL6, PL7
	Change in number of Local Sites in Positive Conservation Management	No reduction of biodiversity and geodiversity designated assets	WE3, PL9
	Change in number and area of heritage assets in the district	No reduction of heritage assets	WE5, PL12
	Risk of pollution and contamination	Avoid degradation of environmental quality in the district	PL10, PL11

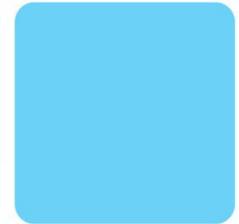
Policy Area	Indicator	Target	Monitoring Policies
	Percentage of new dwellings achieving the Optional Technical Housing Standard for water efficiency (no more than 110 litres per person per day)	100%	PL11
	Amount of land in new development incorporating Sustainable Drainage Systems	Increased provision where appropriate	PL11
	Amount of land in existing development which has been retrofitted to incorporate Sustainable Drainage Systems	Increased provision where appropriate	PL11
<b>Strategic Infrastructure Requirements</b>	Delivery of strategic and local infrastructure to support new development	Delivery of infrastructure in accordance with Infrastructure Delivery Plan	SIR1, IN1, IN2
	Percentage of recycling household waste	Current Council target	SIR3
<b>Lifestyle</b>	Amount of public open space, allotments, play space and sporting provision and facilities	Net gain	L1
	Change in number and area of Recreational, Sporting, Cultural and Community Facilities	No unnecessary loss	L2
	Change in provision of public art in Harlow	No net loss	L3

Policy Area	Indicator	Target	Monitoring Policies
	Quality of infrastructure, facilities and/or design which would improve health	Increased provision	L4

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**MONITORING AND IMPLEMENTATION**  
**19. Implementation**



## 19. IMPLEMENTATION

- 19.1 Implementation of the Local Plan depends upon a robust working partnership between the local authority and various partners. This includes infrastructure providers and statutory bodies, developers and landowners, adjoining local authorities, County Councils, residents and local groups.
- 19.2 The Council has a responsibility as both a facilitator and landowner to bring forward development sites, infrastructure provision and regeneration opportunities identified in the Local Plan. A proportion of the allocated sites are Council owned and will be delivered through various mechanisms including working with developer partners and site disposal. This active involvement in bringing sites forward will also help facilitate the delivery of affordable housing.
- 19.3 Bringing forward the Strategic Housing Site East of Harlow, which is part of one of the four new Garden Town Communities, will require a coordinated and cooperative approach between the Council, the developer and Epping Forest District Council and where appropriate Essex County Council. The preparation and endorsement of an agreed Strategic Master Plan and design code for the site through the Garden Town will ensure consistency between the two authorities. The Garden Town Vision and Design Guide and the Quality Review Panel will ensure a coherent design approach across the Garden Town. The Garden Town Board, along with an independent team, will continue to guide the delivery of the Garden Town. The Board may consider that further joint work is required to support the delivery and this will be taken forward by the Garden Town team and the local authorities.
- 19.4 The Council will consider, if necessary, a more active intervention to deliver development sites and regeneration opportunities in the Local Plan, if sites are not brought forward or if there are delays due to ownership issues or if there are ransom concerns. This includes the use of Compulsory Purchase Orders if appropriate.
- 19.5 It may be necessary to provide further clarity and guidance in respect of certain parts of the Local Plan. The Council will consider preparing supporting documents including Supplementary Planning Documents (SPDs) and Development Briefs to assist in implementation. A separate Area Action Plan is being prepared for the regeneration and redevelopment of the Town Centre.
- 19.6 The Local Plan has been prepared having regard to other strategies and policies prepared by the Council and other relevant public bodies. This includes transport plans produced by the County Council, the Water Resource Management Plan undertaken by Thames Water, health strategies prepared by the Clinical Commissioning Group and NHS England and documents published by the Council such as the Regeneration Strategy and Economic Development Strategy. These will continue to have a relationship to the implementation of the Local Plan.
- 19.7 The Infrastructure Delivery Plan (IDP) will be regularly reviewed to ensure it is kept up to date and a monitoring framework has been prepared to help examine the

effectiveness of the policies and the implementation of the Local Plan. The Council will prepare an Authority Monitoring Report (AMR) each year using this monitoring framework. The AMR will also provide an updated trajectory of development sites.

- 19.8 If there is insufficient supply of land, or other targets are not being met as set out in the AMR, the Council will consider whether a full or partial review of the Local Plan is required.



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# Glossary



## GLOSSARY

**Disclaimer:** *This Glossary is neither a statement of law nor an interpretation of the law. Its status is only an introductory guide to planning issues and should not be used as a source for statutory definitions.*

<b>Affordable Housing</b>	Includes social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market.
<b>Aged or veteran tree</b>	A tree which, because of its great age, size or condition is of exceptional wildlife, landscape or cultural value.
<b>Air Quality Management Area (AQMA)</b>	Area designated by local authorities where national air quality objectives are not likely to be achieved by set deadlines.
<b>Allotment</b>	Land cultivated for the production and personal consumption of fruit and vegetables.
<b>Ancient woodland</b>	A protected area that has been wooded continuously since the year 1600 or earlier.
<b>Area Action Plan (AAP)</b>	A Development Plan Document that provides specific planning policies and guidance for an area where significant regeneration or investment needs to be managed.
<b>Article 4 Direction</b>	Direction removing some or all development rights permitted by The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Article 4 Directions are issued by local authorities.
<b>Attenuation</b>	Relating to rivers, attenuation is the reduction of peak flow and increased duration of a flow event.
<b>Authority Monitoring Report (AMR)</b>	The Authority Monitoring Reports form part of the Local Plan. They are prepared annually and outline the timetable for preparing a Local Plan, development completions in that year, the effectiveness of policies and other such details. They replaced Annual Monitoring Reports.
<b>Biodiversity</b>	The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.
<b>BREEAM (Building Research Establishment Environmental Assessment Method)</b>	An international scheme providing independent third party certification of the sustainability performance of individual buildings, infrastructure projects and communities. Assessment and certification can take place at a number of stages, from design and construction to operation and refurbishment.
<b>Building Regulations</b>	The minimum national standards for design, construction and alterations to buildings, as approved by Parliament.

<b>Claimant Count</b>	Measures the number of people claiming unemployment-related benefits.
<b>Climate Change</b>	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
<b>Climate change adaptation</b>	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.
<b>Climate change mitigation</b>	Action to reduce the impact of human activity on the climate, primarily through reducing greenhouse gas emissions.
<b>Community Infrastructure Levy (CIL)</b>	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in the local area.
<b>Conservation Area</b>	An area of notable environmental or historical interest or importance which is administered by the Council as a Designated Heritage Asset and benefits from additional planning controls to protect it from undesirable changes.
<b>Design Code</b>	A set of illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision such as a master plan or other design and development framework for a site or area.
<b>Designated Heritage Asset</b>	Includes Listed Buildings and their curtilages, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. Such assets have been judged to be of national importance in terms of architectural or historic interest, therefore benefitting from additional planning controls. They are administered by Historic England, with the exception of Conservation Areas which are administered by the Council. Some assets may also be on the Essex Historic Environment Record.
<b>Development Management Policies</b>	Local Plan policies which guide applicants submitting planning applications to obtain planning permission for proposed development. The Council, in its capacity as Local Planning Authority, uses these policies (and other policies in the Local Plan and national policies) to assess and determine such planning applications.

*Chapter continues on next page.*

**Development Plan Document (DPD)**

Development Plan Documents provide a spatial strategy, policies and, where needed, a more detailed action plan for a specific area. They are accompanied by a Policies Map which illustrates the spatial extent of policies in the DPD. The Local Plan is a DPD.

All DPDs must be subject to rigorous procedures of community involvement, consultation and independent examination. Once adopted, Development Management decisions must be made in accordance with DPDs unless material considerations indicate otherwise.

**Duty to Co-operate**

Arising from the Localism Act 2011, this is a legal duty on Local Planning Authorities, County Councils and public bodies in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters.

**Dwelling and Dwellinghouse**

A self-contained building or part of a building used for residential accommodation, and usually housing a single household. A dwelling may be a house, bungalow, flat, maisonette or converted farm building.

**East of England Plan (EEP)**

The Regional Spatial Strategy for the eastern region, officially revoked by Parliament in January 2013.

**Employment Area**

Area allocated for employment uses, to meet the employment needs of local residents and reduce out-commuting, offering a wide range of jobs to create a well-balanced community.

**Enterprise Zone (EZ)**

An area in which incentives such as tax concessions and relaxed planning controls are offered to encourage business investment and development.

**Flood Zone**

The Environment Agency has devised a set of flood zones for guidance by developers, councils and communities to explain the probability of river and sea flooding, ignoring the presence of flood defences.

Zone 1: Low probability: Land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).

Zone 2: Medium probability: Land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (0.1% - 1%) or between 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.1% – 0.5%) in any year.

Zone 3a: High probability: This zone comprises land assessed as having a greater than 1 in 100 annual probability of river flooding (>1.0%), or a greater than 1 in 200 annual probability of flooding from the sea (>0.5%) in any year. .

Zone 3b: Functional Flood plain: Land where water must flow or be stored in times of flood. Local Planning Authorities

	identify areas of functional floodplain, in agreement with the Environment Agency, taking account of local circumstances.
<b>Functional Economic Market Area (FEMA)</b>	Spatial area that can be mapped by a combination of the key indicators of economic activity and across areas.
<b>Garden City/Town/Community</b>	Originating from Ebenezer Howard's Garden Cities and now advocated by the Town and Country Planning Association, a Garden City/Town/Community is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities.
<b>Gateway location</b>	Important entrance point for commuters and visitors to Harlow and linkages that connect the Harlow and Gilston Garden Town communities with the Harlow urban area.
<b>Geodiversity</b>	The full range of rocks, minerals, fossils, soils and landforms.
<b>Green Belt</b>	An area of open land around an urban area, on which inappropriate development is restricted, primarily to prevent unrestricted sprawl and to provide the other nationally-set purposes of Green Belt land.
<b>Green Finger</b>	Linear, open and predominantly green spaces which link to Green Wedges and primarily have a recreational/movement function, as well as providing the other roles and functions as detailed in the Local Plan.
<b>Green Infrastructure (GI)</b>	Green Infrastructure is multi-functional natural and man-made urban and rural green space, including parks, playing fields, woodlands, allotments and wildlife corridors, rivers, canals, lakes and other bodies of water. At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs, and green walls, rain gardens and ponds.
<b>Green Wedge</b>	A series of open and predominantly green spaces, kept free from inappropriate development, which run through the district and provide roles and functions as detailed in the Local Plan, including allowing residents to easily access the wider countryside.
<b>Greenfield Land/Site</b>	Land (or a defined site), such as farmland, that has not previously been developed.
<b>Grow-on space</b>	The development of a new commercial building(s) which will provide space to enable the business to expand in situ, without having to relocate to larger accommodation.
<b>Gross Value Added (GVA)</b>	A measure in economics of the value of goods and services produced in an area, industry or sector of an economy.
<b>Gypsies and Travellers</b>	Persons of nomadic habit of life, whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently.

**Habitats Regulation Assessment (HRA)**

Tool developed by the European Commission to help local authorities carry out assessment to ensure that a project, plan or policy will not have an adverse effect on the integrity of any internationally-designated wildlife sites.

**Harlow and Gilston Garden Town (HGGT)**

The Harlow and Gilston Garden Town provides the framework to enable the development and identification of clear design principles tailored to the unique characteristics of Harlow and the Gilston area. Harlow, Epping Forest and East Hertfordshire District Councils are working in partnership with Hertfordshire County Council, Essex County Council, Hertfordshire Local Enterprise Partnership, South East Local Enterprise Partnership, land owners and promoters to enable the delivery of transformational growth at the Harlow and Gilston Garden Town.

**Hatch**

Small area of shops/other units in Harlow which serve specific local needs and provide for a range of community services.

**Home Quality Mark (HQM)**

Used by developers to demonstrate the high quality of their housing, by providing impartial information from independent experts on a new home's quality. It indicates the health and wellbeing benefits, overall expected costs and environmental footprint arising from living in the new home.

**House in Multiple Occupation (HMO)**

HMOs are properties where three or more unrelated people share at least one amenity (such as a kitchen) and live in the property as their only or main home. A small HMO is where between three and six unrelated people share a home. A large HMO is where more than six unrelated people share a home.

**Housing Market Area (HMA)**

A defined area, across which the level of need and demand for housing, and the opportunities to meet that need and demand, is calculated.

**Infrastructure Delivery Plan (IDP)**

Outlines the pieces of infrastructure required to deliver the development identified in the Local Plan, who will deliver it and the likely costs.

**Listed Building**

A building, object or structure that has been judged to be of national importance in terms of architectural or historic interest and is included on the List of Buildings of Special Architectural or Historic Interest.

**Local Development Order (LDO)**

An Order made by a Local Planning Authority that grants planning permission for a specific development proposal or Use Classes of development.

**Locally Listed Building**

Buildings which do not quite meet the criteria for being nationally listed by Historic England, but which are still of architectural or historical importance in the local area. Such assets, which are non-designated heritage assets, have a degree of significance meriting consideration in planning decisions and are administered by the Council.

<b>Local Enterprise Partnership (LEP)</b>	A body, designated by the Government, established for the purpose of creating or improving the conditions for economic growth in an area.
<b>Local Nature Reserve (LNR)</b>	LNRs are statutorily designated by district or county councils under relevant legislation. They are selected for their importance for wildlife, geology or public enjoyment. Some are also SSSIs. LNRs are controlled by local authorities.
<b>Local Plan</b>	A Development Plan Document setting out the overarching strategy for an area, setting out the future development proposals for at least 15 years, with policies against which planning applications are determined. Accompanied by a Policies Map.
<b>Local Wildlife Site (LWS)</b>	Area of land with significant biodiversity value. They are identified locally using scientifically-determined criteria and ecological surveys, varying in size from open marshes and river valleys to small meadows and secluded ponds.
<b>London Stansted Cambridge Consortium (LSCC)</b>	The Consortium brings together public and private sector organisations which have the common aim of seeking economic growth, higher employment rates, providing places for people and business while preserving the quality and character of the London Stansted Cambridge Corridor, from the Royal Docks to Cambridge/Peterborough.
<b>Main Town Centre Uses</b>	Retail development; leisure and entertainment facilities; more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
<b>Major Development</b>	Development involving one or more of the following: <ul style="list-style-type: none"> <li>(a) the winning and working of minerals or the use of land for mineral-working deposits;</li> <li>(b) waste development;</li> <li>(c) the provision of ten or more dwellinghouses, or where number of dwellinghouses is unknown, the site area is 0.5 hectares or more;</li> <li>(d) the provision of a building(s) - floor space to be built is 1,000 sqm or more;</li> <li>(e) development carried out on a site with an area of 1 hectare or more.</li> </ul>
<b>Market Housing</b>	Private sector housing, the prices of which are set by the market.
<b>Memorandum of Understanding (MoU)</b>	A non-binding, non-exclusive, mutually beneficial agreement with a partner body. It sets out a statement of the

	responsibilities, activities, outcomes, and lead contacts between the parties involved in the project.
<b>Mineral Safeguarding Area (MSA)</b>	An area designated by Minerals Planning Authorities (e.g. Essex County Council) which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.
<b>Minor Development</b>	Development involving the provision of: (a) between one and nine dwellinghouses (inclusive), or where number of dwellinghouses is unknown, the site area is less than 0.5 hectares; or (b) gypsy/traveller site - fewer than 10 pitches; or (c) any other use - floor space to be built is less than 1,000 sqm, or site area is less than 1 hectare.
<b>National Planning Policy Framework (NPPF)</b>	Sets out the Government’s national planning policies for England, and provides a framework within which local people and councils can produce distinctive Local and Neighbourhood Plans, which reflect the needs and priorities of communities. Key topics include what should be included in Local Plans, Design, Ensuring the viability of town centres and Renewable and Low Carbon Energy. The Planning Practice Guidance adds further context.
<b>Neighbourhood Centres</b>	Shops and other uses serving the local neighbourhood area; larger than Hatches. Sometimes known as a Local Centre.
<b>Neighbourhood Service Area</b>	Provides important employment provision at the neighbourhood level and is well-suited to meet the needs of small start-up businesses, with units of approximately 20 to 40sqm in size being typically available.
<b>New Town</b>	Cities or towns that are designed from the outset and built in a relatively short period of time. They are designed according to a master plan on a site where there was no settlement before. This distinguishes a New Town from a traditional urban area which gradually grows and evolves over time.
<b>Non-Designated Heritage Asset</b>	Includes Locally Listed Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not nationally designated heritage assets. Such assets are administered by the Council and may be on the Essex Historic Environment Record.
<b>Objectively Assessed Housing Need (OAHN)</b>	The assessment of housing need and the Council’s housing strategy, reflecting principles set out in national planning policies and guidance.
<b>Older people</b>	People over retirement age whose housing needs include those looking to downsize from family housing, and the full range of retirement and specialised housing for those with support or care needs.

<b>Other Open Spaces</b>	Open spaces, both private and publically owned, which are not allocated as Green Belt, Green Wedge or Green Finger in the Local Plan. Other Open Spaces vary in nature and quality and can include: strips of landscaping, amenity spaces and gardens, areas of land between buildings, informal recreational areas, and woodland and landscaping belts.
<b>Passivhaus</b>	Also known as 'passive house'. A standard for energy efficiency in a building to reduce its ecological footprint, resulting in ultra-low energy buildings requiring little energy for heating or cooling, primarily using passive features such as solar gain or natural ventilation. Can be applied to offices and residential buildings, as well as both new and refurbished buildings.
<b>People with disabilities</b>	People are defined as having a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties and mental health needs.
<b>Pollution</b>	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions and sources, including smoke, fumes, gases, dust, steam, odour, noise and light.
<b>Permitted Development Rights (PDR)</b>	Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).
<b>Planning Condition</b>	A condition imposed upon grant of planning permission (in accordance with the Town and Country Planning Act 1990 (as amended)) or a condition included in a Local Development Order or Neighbourhood Development Order.
<b>Planning Obligation</b>	A legally enforceable obligation entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. Sometimes called "Section 106" agreements.
<b>Planning Practice Guidance (PPG)</b>	National guidance which adds further context to the NPPF and it is intended that the two should be read together.
<b>Policies Map</b>	Outlines a Local Plan's policies and allocations on a map form.
<b>Previously Developed Land or Brownfield Land</b>	Land which is or was occupied by a permanent structure, including at least some of the curtilage of the developed land and any associated fixed surface infrastructure. Excludes land occupied by agricultural or forestry buildings; land developed for minerals extraction or waste disposal; land in built-up

areas such as private residential gardens, parks, recreation grounds and allotments; and land previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**Primary and Secondary Frontages**

Lengths of shopping units which provide a visual indication of the use of the units. Primary frontages include a high proportion of retail uses, including the sale of food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and other businesses.

**Registered Parks and Gardens**

Gardens, grounds, parks and other planned open spaces which are administered by Historic England and registered on the Register of Parks and Gardens of special historic interest in England. They are designated heritage assets and benefit from the associated additional planning controls.

**Scheduled Monument**

Nationally important monuments, usually archaeological remains that are afforded greater protection against inappropriate development through the Ancient Monuments and Archaeological Areas Act 1979 (as amended). Scheduled Monuments are designated heritage assets, administered by Historic England, and benefit from the associated additional planning controls.

**Sedgefield method**

Method used to calculate the level of housing deficit or shortfall from the base date of an adopted Local Plan, which should be added to the housing requirements for the next 5-year period.

**Self-build and Custom-build Housing**

Self-build usually means that people are directly involved in organising the design and construction of their new home. Custom build usually means working with a specialist developer to help deliver a home.

**Sequential Approach Test**

A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.

**Site of Special Scientific Interest (SSSI)**

A site designated by Natural England under the Wildlife and Countryside Act 1981 (as amended) as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (plants, animals and natural features relating to the Earth's structure).

**Small to Medium-sized Enterprise (SME)**

The Government uses the EU definition of an SME, which states that a medium enterprise/business is one with fewer than 250 employees and turnover under £50 million.

**Social Housing**

Accommodation that is affordable to people on low incomes. Limits to rent increases set by law mean that rents are kept affordable.

<b>Source Protection Zones (SPZ)</b>	The Environment Agency identifies SPZs to protect groundwater (especially public water supply) from developments that may damage its quality.
<b>Spatial Development Strategy</b>	Broadly sets out how the Vision for Harlow and the Themes and Strategic Objectives of the Local Plan will be achieved and delivered. The aims of the Strategy include protecting and enhancing important areas which offer residents a good quality of life, and changing areas through new development to improve living standards for existing and future residents. The Key Diagram graphically represents the Strategy.
<b>Strategic Growth Strategy</b>	Provides the Strategic Policies to deliver the Spatial Development Strategy.
<b>Statement of Community Involvement (SCI)</b>	A document setting out how the Council will consult people and organisations on the preparation of the Local Plan and also on planning applications.
<b>Statement of Common Ground</b>	A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the Local Plan period, and based on effective joint working across local authority boundaries.
<b>Strategic Flood Risk Assessment (SFRA)</b>	An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.
<b>Strategic Housing Land Availability Assessment (SHLAA)</b>	A technical study which identifies sites with development potential for housing and assesses their developability, deliverability and capacity.
<b>Strategic Housing Market Assessment (SHMA)</b>	Assesses the housing market for a particular area and sets out the housing demand and the scale of housing need required to satisfy that demand over a given period.
<b>Sui Generis</b>	Uses of land or buildings not falling into any of the Use Classes identified by the Town and Country Planning (Use Classes) Order 1987 (as amended), for example theatres, launderettes, car showrooms and filling stations.
<b>Supplementary Planning Document (SPD)</b>	Document which adds further detail to policies in a Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are capable of being a material consideration in planning decisions but are not part of a development plan.
<b>Sustainability Appraisal (SA)</b>	A tool used to appraise planning policy documents in order to promote sustainable development. Social, environmental and economic aspects are all taken into consideration.

**Sustainable Development**

A widely used definition drawn up by the World Commission on Environment and Development in 1987: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

The Government set out four aims for sustainable development: social progress which recognises the needs of everyone, effective protection of the environment, prudent use of natural resources, and maintenance of high and stable levels of economic growth and employment.

**Sustainable Drainage Systems (SuDS)**

A sequence of management practices and control structures designed to drain surface water in a more sustainable fashion than some conventional techniques and to mimic natural drainage as closely as possible.

**Transport Assessment/ Statement (TA/TS)**

Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development.

**Travel Plan**

Long-term management strategies for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel (such as promoting walking and cycling).

**Use Class**

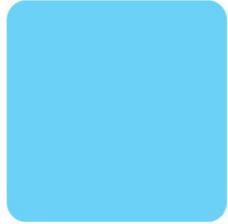
Uses of land and buildings in various categories under the Town and Country Planning (Use Classes) Order 1987 (as amended).

**Windfall Sites**

Sites which become available for development unexpectedly and are therefore not allocated as housing land in a Local Plan.



**Appendices**

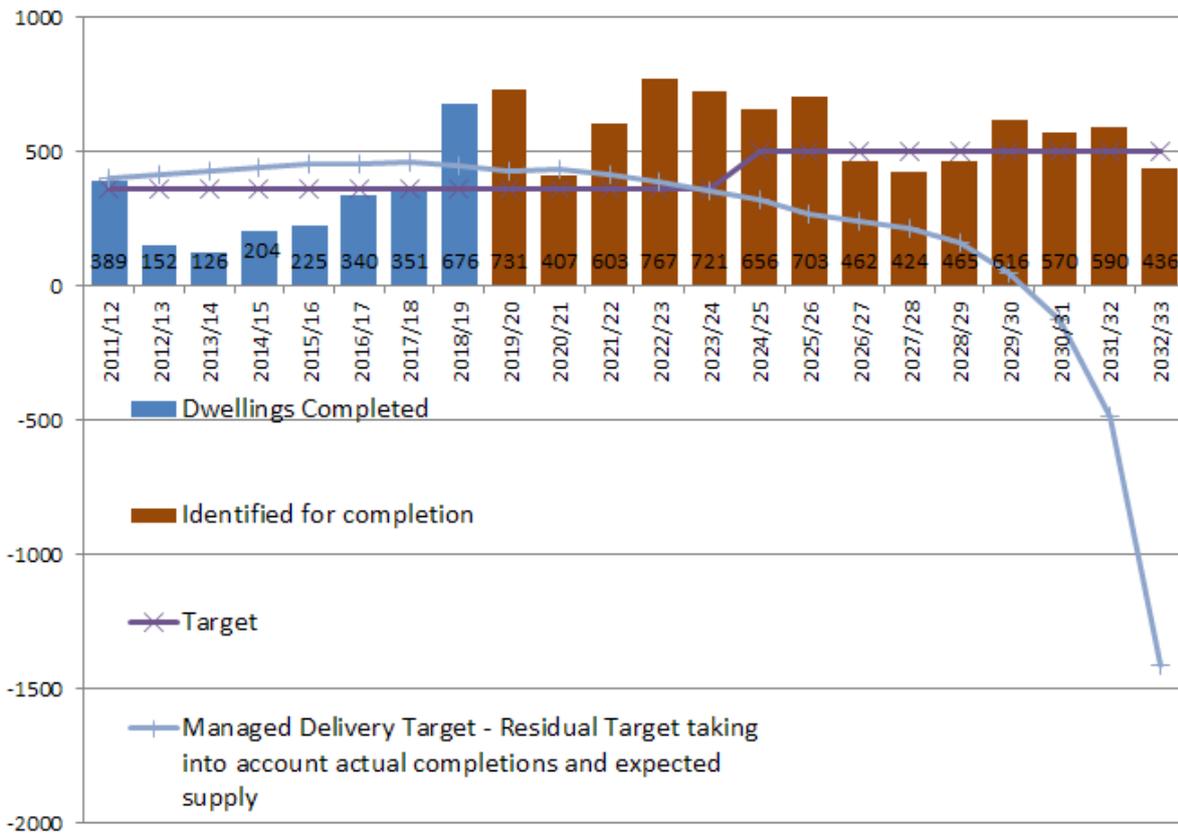


## APPENDIX 1: HOUSING LAND SUPPLY CALCULATION

As at 31 March 2019, using the Sedgefield method.

<b>A.</b> Requirement to be delivered in the plan period	9,200
<b>B.</b> Requirement to be delivered by 31 March 2019 (361 x 8)	2,888
<b>C.</b> Completions by 31 March 2019	2,463
<b>D.</b> Under supply since start of plan	425
<b>E.</b> Further requirement to 31 March 2024 (361 x 5)	1,805
<b>F.</b> Total requirement to 31 March 2024 (D + E)	2,230
<b>G.</b> Requirement including 20% buffer	2,676
<b>H.</b> Annualised requirement (G ÷ 5)	535
<b>I.</b> Supply from proposed allocations (19/20 to 23/24)	248
<b>J.</b> Commitments as at 31 March 2019	2,981
<b>K.</b> Total supply as at 31 March 2019	3,229
<b>L.</b> Years supply (K ÷ H)	6.0 years

## APPENDIX 2: HOUSING TRAJECTORY



# APPENDIX 3: NEIGHBOURHOOD CENTRES FRONTAGES

Bush Fair Neighbourhood Centre - Frontages



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### Church Langley Neighbourhood Centre - Frontages



**Legend**

- Neighbourhood Centre Frontage
- Neighbourhood Centre Boundary

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Old Harlow Neighbourhood Centre - Frontages



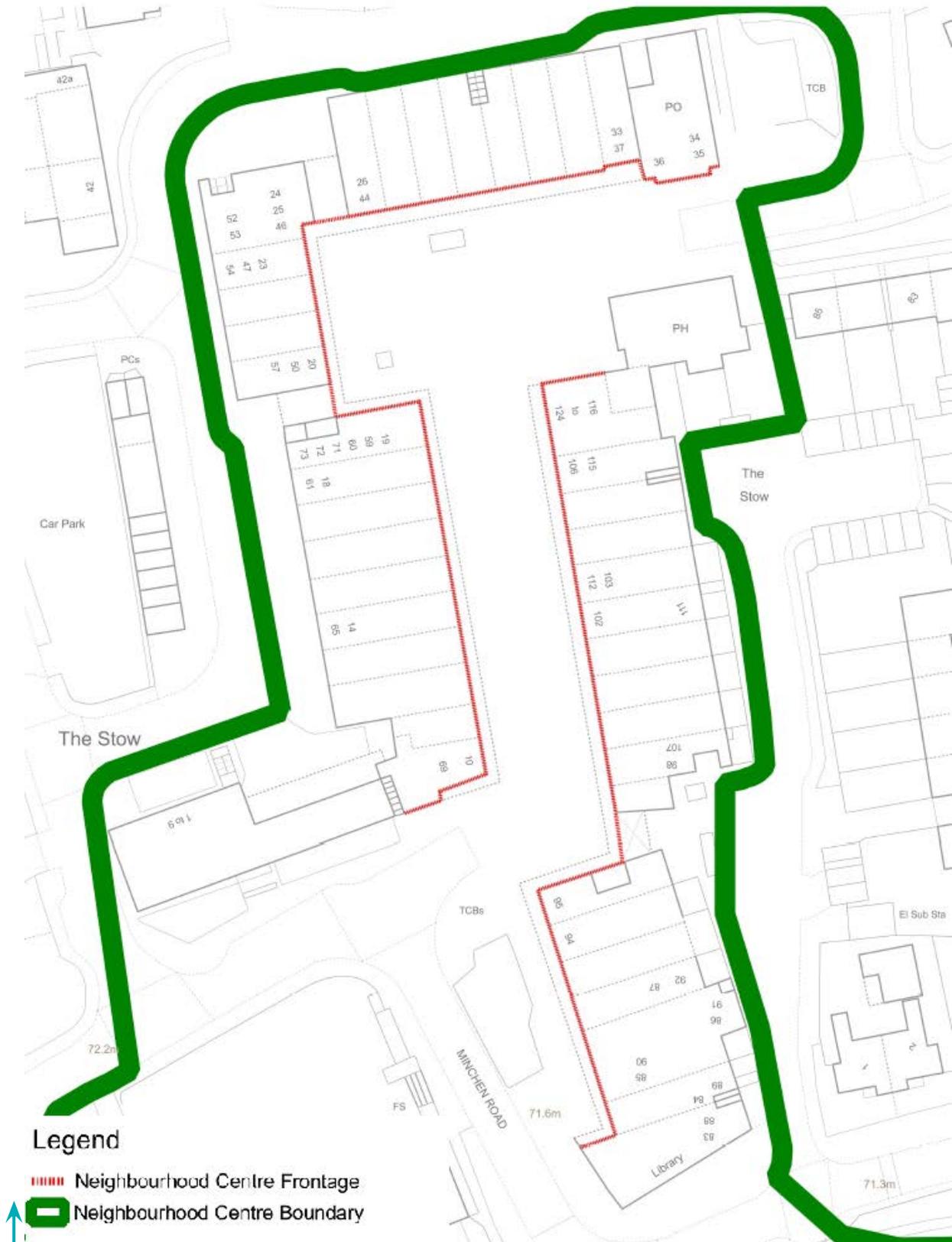
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Staple Tye Neighbourhood Centre - Frontages



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### The Stow Neighbourhood Centre - Frontages

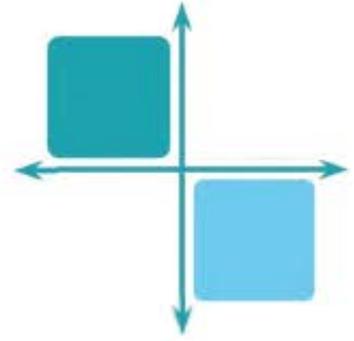


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# Harlow

## Local Development Plan

### Adopted December 2020



Designed and produced by  
Harlow Council

### SCHEDULE OF MAIN MODIFICATIONS TO ACCOMPANY FINAL REPORT, 5 NOVEMBER 2020

This Schedule is ordered by chapter and modification number and contains the policy reference/paragraph number and page number for each modification.

Deleted text, maps or other figures are shown with a ~~red-strike-through~~; additions and replacements are underlined in green. Dots denote where the paragraph/policy continues before/after the text shown in the modification.

Due to insertions of new paragraphs, the paragraph numbers will subsequently change. These changes have not been indicated in this schedule. The policy and paragraph numbers referred to in this schedule are those found in the Pre-Submission Publication version of the Local Plan.

The **Pre-Submission Publication version of the Local Plan** and **Policies Map** are available on the Council website at [www.harlow.gov.uk](http://www.harlow.gov.uk) or by clicking [here](#) and [here](#), respectively.

Mod No.	Policy No./Paragraph No.	Modification
<b>CHAPTER 5</b>		
MM1	<p>Chapter intro New para after para 5.2 Page 36</p> <p>Policy HGT1 Page 38</p> <p>(continues on next page)</p>	<p><u>The four Garden Town Communities will be well connected and not considered in isolation to the urban fabric of Harlow. The master plan processes for these sites must integrate with and regenerate neighbouring areas of Harlow.</u></p> <p>1. (d) Gilston Area <u>(including seven villages)</u> - delivering approximately.....</p> <p>2. <del>The design, development and phased delivery of each Garden Town Community must accord with.....</del> <u>As the focus of the Garden Town, Harlow Council will expect the design, development and phased delivery of each Garden Town Community to accord with all the following principles...</u></p> <p>.....</p> <p>(c) .....including <u>heritage assets</u>, Green Infrastructure, the public realm, community facilities.....</p> <p>(d) a Strategic Master Plan must be developed <del>for each of the Garden Town Communities</del> in <del>accordance</del> <u>general conformity</u> with the Harlow and Gilston Garden Town <del>Spatial</del> Vision and Design <del>Charter</del> <u>Guide</u> .....</p> <p>(e) .....be consistent with and adhere to <del>the</del> <u>any</u> relevant Design Codes;</p> <p>(f).....with the proposed development to mitigate any impacts <del>of the new Garden Town Communities</del>, to meet the.....</p> <p>.....</p> <p>(i).....accessible and safe transport system which <u>reduces car use and</u> maximises the use.....and the new Garden Town Community<u>ies</u>;</p> <p>.....</p> <p>(k) <del>develop</del> <u>Compliance with</u> specific parking standards which recognise that car ownership will need to be accommodated without impacting on the quality of place whilst making the best use of land;...</p> <p>(l) Create distinctive environments which relate to the surrounding area <del>and</del> <u>take full account of topography and landform, protect or enhance the</u> natural and historic landscapes, <del>and</del> systems <u>and wider historic environment</u>, Green Infrastructure and biodiversity. <u>The layout should respond to and extend where possible the existing network of Green Wedges and Green Fingers in the district;</u></p> <p>...</p> <p><u>(o) a Heritage Impact Assessment will be required to inform the design of the Garden Town Community to ensure heritage assets within and surrounding the site are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design as identified through the Heritage Impact Assessment;</u></p>

Mod No.	Policy No./Paragraph No.	Modification
MM1 cont.	Policy HGT1 Page 38 cont.	<p><u>(p) key transport interventions (such as M11 J7/7a) and provision of sustainable transport (providing viable alternatives to the private car) will need to be agreed prior to the development being permitted. Measures to ensure future upkeep/maintenance of sustainable transport provision will be required...</u></p> <p><u>(g) Inclusion of any measures necessary to safeguard wildlife sites beyond the district boundary in accordance with Policy WE3a</u></p> <p><u>Developers will be expected to make a fair and reasonable contribution to the strategic highway and other infrastructure requirements set out in the Infrastructure Delivery Plan.</u></p>
	Para 5.27	.....The development is required to provide community facilities including Early Years facilities, <del>a two-form-entry primary school and two sites of at least 2.1ha and 2.9ha in area for primary school provision and at least 10ha of land in addition to</del> appropriate contributions <del>(including the provision of land)</del> towards a new secondary school.....
	Para 5.28	..... These include <del>works to widen the B183 Gilden Way, a left turn slip road from the new M11 Junction 7a, a link road approach to the Strategic Housing Site East of Harlow northern access road, and linkages into walking and off-road cycle networks the provision of direct bus/walk/cycle access and linkage to/through the Newhall site as part of the Sustainable Transport Corridor improvements (to be consistent with the mitigation terms of the planning permission granted for the Newhall development). Linkages into other walking and off-road cycle networks will be required.</del> In addition to Epping Forest's access requirement, Harlow will require the provision of <del>an</del> additional access roads to the south <del>unless it can be shown that a third access is not required.</del> <u>Suitable highway improvements will need to be agreed overall with Essex County Council as the Highway Authority.....</u>
	Para 5.29	..... a new <del>two-form-entry</del> <u>site of at least 2.1ha in area for a primary school, and at least 10ha of land in addition to</u> appropriate.....
	Para 5.32	.....a new <del>two-form-entry</del> <u>site of at least 2.5ha in area for a primary school.....</u>
<b>CHAPTER 7</b>		
MM2	Policy HS1 Page 53	<p>The Local Plan identifies sites to deliver at least 9,200 dwellings during the Local Plan period (1 April 2011 to 31 March 2033).</p> <p><u>In view of the lead time for bringing forward the Strategic Housing Site East of Harlow, together with the sites at Newhall and the Princess Alexandra Hospital, this will be provided in accordance with a stepped requirement of 361 dwellings per annum from April 2011 to March 2024 and 501 dwellings per annum from April 2024 to March 2033.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
MM2 cont.	HS1 Justification Fig 7.1 Page 53	<p>Completions at 31 March <del>2017</del> <u>2019</u> <del>4,436</del> <u>2,463</u>            Commitments at 31 March <del>2017</del> <u>2019</u> <del>4,122</del> <u>4,723</u>            Strategic Housing Site East of Harlow 2,600  <u>Policy HS2 sites</u> <u>834</u>  <del>Additional requirement</del> <u>1,042</u>            TOTAL SUPPLY <u>9,200</u> <u>10,620</u>  <u>Surplus over 9,200 requirement</u> <u>1,420</u></p>
	HS1 Justification Para 7.6 Page 53	<p>The Local Plan must ensure there is sufficient supply of <del>market, affordable and specialist</del> dwellings to meet Harlow's Objectively Assessed Housing Need (OAHN) of <del>7,400</del> <u>6,820</u> dwellings. To contribute to affordable housing need, <del>and the</del> regeneration <u>of the district and to help meet the wider needs of the Housing Market Area</u>, an additional <del>1,800</del> <u>2,380</u> dwellings are <del>provided proposed</del>, giving a total <u>requirement</u> of 9,200 dwellings <u>during the Local Plan period</u>. As at 31 March 2019, <u>2,463 dwellings had been completed and there were 4,723 dwelling commitments, leaving a further requirement for 2,014 dwellings. Anticipated sources of supply are shown in Fig. 7.1. The projected surplus over the requirement allows for flexibility, possible slippage of large sites and for some permissions to lapse. Since the start of the Local Plan period, 5,558 dwellings have been granted planning permission, which have contributed towards meeting this housing requirement. This leaves sites for 1,042 dwellings to be identified.....</u></p>
	HS1 Justification Para 7.18 Page 54	<p>The number of dwellings apportioned to Harlow in the 2017 update <del>is was</del> 7,409 which equates to 337 dwellings per annum over the Local Plan period. This figure <del>is was</del> used as the basis for the OAHN <del>in</del> <u>when preparing</u> the Local Plan.</p>
	HS1 Justification New para after 7.18 Page 54	<p>However, in June 2020, the Office for National Statistics published more up to date 2018-based household projections which form the latest available starting point to estimate housing need. Using these lower projections as the starting point but adjusted for longer term migration trends, suppressed household formation and market signals, the 2020 SHMA update indicates the OAHN for the HMA as a whole is 48,915 dwellings and within this 6,820 dwellings for Harlow.</p>
	HS1 Justification Para 7.23 Page 55	<p>....The requirement is <del>1,800</del> <u>2,380</u> above the OAHN identified in the <del>2017 SHMA</del> <u>2020 SHMA update</u> to meet Harlow's affordable housing and regeneration needs, <u>to help meet the wider needs of the Housing Market Area</u>, and provides an additional buffer....</p>

Mod No.	Policy No./Paragraph No.	Modification
	<p>HS1 Implementation New paras after para 7.24 Page 56</p>	<p><u>National planning policies require a five-year supply of deliverable housing sites on adoption of the Local Plan and subsequently.</u></p> <p><u>To ensure that a five-year supply is achieved, a stepped requirement is proposed for the Local Plan period. The need for a stepped requirement arises because a significant number of homes will be delivered on large residential sites at Newhall, the Strategic Housing Site East of Harlow and at the Princess Alexandra Hospital. These will be delivered in the later part of the Local Plan period.</u></p> <p><u>As Harlow is a former New Town with tightly-drawn boundaries and a planned nature, with distinctive Green Wedges which are uniquely important to the district's distinctive green character, there is less scope to deliver housing sites at an early date to fulfil a five-year housing land supply as may be the case in a large district.</u></p> <p><u>A requirement of 361 dwellings per annum has therefore, been identified for the period of 2011/12 to 2023/24. Using this figure to calculate under-supply from previous years and applying a 20% buffer will deliver an initial six-year supply of deliverable dwellings to comply with national planning policies. From 2024/25 to the end of the Local Plan period, an increased requirement of 501 dwellings per annum has been set to meet the 9,200 dwelling requirement overall (see Appendices 1 and 2 for the supply calculation and anticipated trajectory).</u></p>

Mod No.	Policy No./Paragraph No.	Modification																																																																					
MM3	Policy HS2 Page 57	<p data-bbox="577 193 2105 252"><u>In addition to the Strategic Housing Site East of Harlow (Policy HS3),</u> to meet the housing requirement of 9,200* dwellings during the Local Plan period, the following sites are allocated.</p> <table border="1" data-bbox="577 316 1720 1117"> <thead> <tr> <th data-bbox="577 316 723 375">REF.</th> <th data-bbox="730 316 1496 375">LOCATION</th> <th data-bbox="1503 316 1720 375">DWELLING CAPACITY</th> </tr> </thead> <tbody> <tr> <td data-bbox="577 379 723 406">1</td> <td data-bbox="730 379 1496 406">Princess Alexandra Hospital</td> <td data-bbox="1503 379 1720 406"><del>650</del> 550</td> </tr> <tr> <td data-bbox="577 411 723 438">2</td> <td data-bbox="730 411 1496 438">The Stow Service Bays</td> <td data-bbox="1503 411 1720 438">70</td> </tr> <tr> <td data-bbox="577 443 723 470"><del>3</del></td> <td data-bbox="730 443 1496 470"><del>Land east of Katherines Way, west of Deer Park</del></td> <td data-bbox="1503 443 1720 470"><del>69</del></td> </tr> <tr> <td data-bbox="577 475 723 534">4 <u>3</u></td> <td data-bbox="730 475 1496 534"><del>Lister House,</del> Staple Tye Mews, Staple Tye Depot and The Gateway Nursery</td> <td data-bbox="1503 475 1720 534"><del>42</del> 30</td> </tr> <tr> <td data-bbox="577 539 723 566"><del>5</del></td> <td data-bbox="730 539 1496 566"><del>South of Clifton Hatch</del></td> <td data-bbox="1503 539 1720 566"><del>36</del></td> </tr> <tr> <td data-bbox="577 571 723 598"><del>6</del> <u>4</u></td> <td data-bbox="730 571 1496 598">Riddings Lane</td> <td data-bbox="1503 571 1720 598">35</td> </tr> <tr> <td data-bbox="577 603 723 630"><del>7</del></td> <td data-bbox="730 603 1496 630"><del>Kingsmoor Recreation Centre</del></td> <td data-bbox="1503 603 1720 630"><del>35</del></td> </tr> <tr> <td data-bbox="577 635 723 662"><del>8</del> <u>5</u></td> <td data-bbox="730 635 1496 662">The Evangelical Lutheran Church, Tawneys Road</td> <td data-bbox="1503 635 1720 662">35</td> </tr> <tr> <td data-bbox="577 667 723 694"><del>9</del></td> <td data-bbox="730 667 1496 694"><del>Land east of 144-154 Fennells</del></td> <td data-bbox="1503 667 1720 694"><del>23</del></td> </tr> <tr> <td data-bbox="577 699 723 726"><del>10</del> <u>6</u></td> <td data-bbox="730 699 1496 726">Pollard Hatch plus garages and adjacent land</td> <td data-bbox="1503 699 1720 726">20</td> </tr> <tr> <td data-bbox="577 730 723 758"><del>11</del></td> <td data-bbox="730 730 1496 758"><del>Land between Second Avenue and St. Andrews Meadow</del></td> <td data-bbox="1503 730 1720 758"><del>16</del></td> </tr> <tr> <td data-bbox="577 762 723 790"><del>12</del> <u>7</u></td> <td data-bbox="730 762 1496 790">Coppice Hatch and garages</td> <td data-bbox="1503 762 1720 790">16</td> </tr> <tr> <td data-bbox="577 794 723 821"><del>13</del> <u>8</u></td> <td data-bbox="730 794 1496 821">Sherards House</td> <td data-bbox="1503 794 1720 821">15</td> </tr> <tr> <td data-bbox="577 826 723 853"><del>14</del> <u>9</u></td> <td data-bbox="730 826 1496 853">Elm Hatch and public house</td> <td data-bbox="1503 826 1720 853">13</td> </tr> <tr> <td data-bbox="577 858 723 885"><del>15</del></td> <td data-bbox="730 858 1496 885"><del>Playground west of 93 – 100 Jocelyns</del></td> <td data-bbox="1503 858 1720 885"><del>12</del></td> </tr> <tr> <td data-bbox="577 890 723 917"><del>16</del> <u>10</u></td> <td data-bbox="730 890 1496 917">Fishers Hatch</td> <td data-bbox="1503 890 1720 917">10</td> </tr> <tr> <td data-bbox="577 922 723 949"><del>17</del> <u>11</u></td> <td data-bbox="730 922 1496 949">Slacksbury Hatch and associated garages</td> <td data-bbox="1503 922 1720 949">10</td> </tr> <tr> <td data-bbox="577 954 723 981"><del>18</del> <u>12</u></td> <td data-bbox="730 954 1496 981">Garage blocks adjacent to Nicholls Tower</td> <td data-bbox="1503 954 1720 981">10</td> </tr> <tr> <td data-bbox="577 986 723 1013"><del>19</del> <u>13</u></td> <td data-bbox="730 986 1496 1013">Stewards Farm</td> <td data-bbox="1503 986 1720 1013">10</td> </tr> <tr> <td data-bbox="577 1018 723 1045"><del>20</del></td> <td data-bbox="730 1018 1496 1045"><del>Land between Barn Mead and Five Acres</del></td> <td data-bbox="1503 1018 1720 1045"><del>10</del></td> </tr> <tr> <td data-bbox="577 1050 723 1077"><del>21</del> <u>14</u></td> <td data-bbox="730 1050 1496 1077">Pypers Hatch</td> <td data-bbox="1503 1050 1720 1077">10</td> </tr> <tr> <td data-bbox="577 1082 723 1109"></td> <td data-bbox="730 1082 1496 1109"><b>Total Dwellings Allocated</b></td> <td data-bbox="1503 1082 1720 1109"><del>1,147</del> 834</td> </tr> </tbody> </table> <p data-bbox="577 1209 1182 1241"><i>See changes to Policies Map in separate schedule</i></p>	REF.	LOCATION	DWELLING CAPACITY	1	Princess Alexandra Hospital	<del>650</del> 550	2	The Stow Service Bays	70	<del>3</del>	<del>Land east of Katherines Way, west of Deer Park</del>	<del>69</del>	4 <u>3</u>	<del>Lister House,</del> Staple Tye Mews, Staple Tye Depot and The Gateway Nursery	<del>42</del> 30	<del>5</del>	<del>South of Clifton Hatch</del>	<del>36</del>	<del>6</del> <u>4</u>	Riddings Lane	35	<del>7</del>	<del>Kingsmoor Recreation Centre</del>	<del>35</del>	<del>8</del> <u>5</u>	The Evangelical Lutheran Church, Tawneys Road	35	<del>9</del>	<del>Land east of 144-154 Fennells</del>	<del>23</del>	<del>10</del> <u>6</u>	Pollard Hatch plus garages and adjacent land	20	<del>11</del>	<del>Land between Second Avenue and St. Andrews Meadow</del>	<del>16</del>	<del>12</del> <u>7</u>	Coppice Hatch and garages	16	<del>13</del> <u>8</u>	Sherards House	15	<del>14</del> <u>9</u>	Elm Hatch and public house	13	<del>15</del>	<del>Playground west of 93 – 100 Jocelyns</del>	<del>12</del>	<del>16</del> <u>10</u>	Fishers Hatch	10	<del>17</del> <u>11</u>	Slacksbury Hatch and associated garages	10	<del>18</del> <u>12</u>	Garage blocks adjacent to Nicholls Tower	10	<del>19</del> <u>13</u>	Stewards Farm	10	<del>20</del>	<del>Land between Barn Mead and Five Acres</del>	<del>10</del>	<del>21</del> <u>14</u>	Pypers Hatch	10		<b>Total Dwellings Allocated</b>	<del>1,147</del> 834
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Mod No.	Policy No./Paragraph No.	Modification
MM4 cont.	Policy HS3 Page 58-59 cont.	<p><del>(d) — provide footpaths, cycleways and bridleways within the development and link them to the existing Harlow network</del></p> <p><del>(e) provide indoor and outdoor sports facilities, which may be shared use, neighbourhood equipped areas for play and locally equipped areas for play;</del></p> <p>(g) provide <del>for</del> appropriate local retail facilities, similar to Neighbourhood Centres (incorporating an element of employment use) and Hatches elsewhere in Harlow;</p> <p><del>(g) — provide for appropriate community facilities as set out in the IDP such as allotment provision, youth services and libraries;</del></p> <p><u>(h) a Heritage Impact Assessment will be required to inform the design of the Garden Town Community to ensure heritage assets within and surrounding the site are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design as identified through the Heritage Impact Assessment;</u></p> <p><u>(i) be designed sensitively to take full account of topography and landform;</u></p> <p>(j) provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment;</p> <p><u>(k) provide satisfactory water supply and waste water network infrastructure for occupants;</u></p> <p>(l) provide and contribute to public art within the development; and</p> <p><u>(m) include any measures necessary to safeguard wildlife sites beyond the district boundary in accordance with Policy WE3a;</u></p> <p>Infrastructure, including social infrastructure, must be delivered at a pace which meets the needs of the proposed development throughout the construction of the site.</p> <p>Any application for development on the site in the form of individual or part/phased development <del>will be assessed on</del> <u>should be in general conformity with a Strategic Master Plan which has been endorsed by the Council as well as</u> the <u>Harlow and Gilston Garden Town Charter Design Guide.</u></p> <p>Developers will be expected to <u>make a fair and reasonable</u> contribution <del>ion towards</del> the strategic highway and other infrastructure requirements <u>set out in the Infrastructure Delivery Plan.</u> <del>proportionate with the impact that the development would have on them.</del></p>

Mod No.	Policy No./Paragraph No.	Modification
<b>MM4 cont.</b>	HS3 Implementation New para after para 7.43 Page 60	<u>The Strategic Housing Site East of Harlow forms part of a wider Garden Town Community, the northern part of which has been proposed for allocation in the emerging Epping Forest District Local Plan for 750 dwellings, which will be subject to the preparation of a Strategic Master Plan. With regards to part e(ii) of Policy HS3, if the Strategic Master Plan indicates that the secondary school is not required within the Harlow district part of the site, then consideration will be given to appropriate alternative development and associated infrastructure having regard to the policies in the Local Plan, and the balance of uses within the Strategic Site as a whole.</u>
<b>CHAPTER 8</b>		
<b>MM5</b>	Policy ED1 Page 65	<p>....up to 18.8 ha of <u>land for B1 (a, b and c) uses</u> <del>will be delivered</del> <u>is allocated</u> at Harlow Business Park at The Pinnacles and at the Harlow Enterprise Zone at London Road.</p> <p><u>Proposals for non-B1 use on these sites will require strong justification.</u></p> <p>A further 2.2 ha of land will be delivered for employment uses <u>(B1a, B1b, B1c, B2 and B8)</u> at Templefields.</p> <p>Table unchanged TOTAL EMPLOYMENT PROVISION <del>20-ha</del> <u>21 ha</u></p>
	<p>ED1 Justification Para 8.7 Page 65</p> <p>Para 8.10 Page 66</p> <p>Para 8.11 Page 66</p>	<p>.....expansion of Princess Alexandra Hospital will strengthen these growth sectors. <u>London Road, which forms part of the Enterprise Zone, has been specifically identified to facilitate the Research and Development sector of the local economy. Warehouse and general industrial uses on this site will therefore require strong justification.</u></p> <p>....this concluded that 10 to 24 ha of <u>land for offices floorspace (B1a)</u> and 68 ha <del>of for</del> <u>industrial uses floorspace (B1b, B1c, B2 and B8)</u> should be planned for during the period <del>of</del> 2016 to 2033.</p> <p>For Harlow, the document identified the need to plan for a further 2 to 4 ha of <u>land for offices floorspace (B1a)</u> and 16 ha <del>of for</del> <u>industrial uses floorspace (B1b, B1c, B2 and B8)</u> between 2016 and 2033.</p> <p>....in order to develop the Economic and Prosperity Strategy for Harlow <u>and to reflect the Harlow Economic Development Strategy 2017</u> to satisfy the strategic demand for growth sectors in the Garden Town....</p>

Mod No.	Policy No./Paragraph No.	Modification
	Policy ED2 Page 67	<p>ED2 Protecting Existing Employment <del>Floorspace</del> <u>Areas</u></p> <p>Existing <del>strategic e-Employment sites</del> <u>Areas</u> at The Pinnacles, Templefields, <del>and London Road</del> <u>Burnt Mill, Staple Tye, Bush Fair and Church Langley</u> will be retained and enhanced for a mix of office, industrial and warehouse uses and other associated activities <u>in accordance with Policy PR1</u>.</p> <p><u>The Enterprise Zone at London Road will facilitate the Research and Development Sector and other associated activities. Employment uses which are not related to the Research and Development sector will therefore require strong justification.</u></p> <p>Grow-on space will be supported on existing <del>allocated e-Employment sites</del> <u>Areas</u> and on future employment sites identified at The Pinnacles (ED1-01) and Templefields (ED1-03).</p> <p>Neighbourhood Service Areas <u>at The Stow, Bush Fair and Staple Tye</u> will be protected <u>in accordance with Policy PR2</u> and the provision of.....</p> <p><del>Existing employment sites and Neighbourhood Service Areas are identified on the Policies Map. In all the above cases, developers will be expected to work with Broadband service providers to ensure that the provision of future proofed high speed Broadband infrastructure is available to occupiers and this should be by fibre connection wherever possible.</del></p> <p><i>See change to Policies Map in separate schedule.</i></p>
	ED2 Justification Para 8.16 Page 67	<p>The district's existing <del>e-Employment a</del> <u>Areas and Neighbourhood Service Areas, as set out in this policy at Templefields, London Road and The Pinnacles and shown on the Policies Map,</u> continue to make an important contribution.....</p> <p>.....The Council will continue to implement the masterplan for London Road. <u>In respect of London Road North, this policy will ensure that the site continues to deliver Research and Development uses to support the overall economic development strategy for Harlow. The Local Development Order for London Road North lists development uses permitted on the site, other uses will require strong justification.</u></p>
MM5 cont.	ED2 Justification New para after 8.17 Page 68	<p><u>To continue to support existing knowledge-based industries, and to promote the development of new ones such as creative industries, high speed broadband is, therefore essential. Policy ED2, along with Policy IN4, aims to improve and secure the delivery of high speed broadband infrastructure.</u></p>
	ED2 Implementation New para after para 8.19 Page 68	<p><u>When submitting an application, developers for new Employment Areas will be expected to provide information to demonstrate how they have sought to secure high speed broadband provision as part of their proposals.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
<b>CHAPTER 10</b>		
<b>MM6</b>	Policy WE1 Page 81	<i>Changes to Green Belt designation – see changes to Policies Map in separate schedule</i>
	WE1 Justification New para after para 10.8 Page 81	<u>In addition to the release of the land for the Strategic Housing Site East of Harlow from the Green Belt, further minor changes to the Green Belt boundaries have been made to take account of a.) the proposed Garden Town Community in the Epping Forest district west of Harlow; b.) existing development in the Green Belt; and c.) to establish stronger, more clearly defined boundaries following physical features on the ground. These changes all accord with national planning policies, including meeting the exceptional circumstances required for changing Green Belt boundaries.</u>
<b>MM7</b>	Policy WE1	<i>Changes to Green Wedge and Green Finger designation – see changes to Policies Map in separate schedule</i>
<b>MM8</b>	Policy WE2 Page 84	<p>WE2 <u>Green Belt</u>, Green Wedges and Green Fingers</p> <p>Harlow <u>is surrounded by Green Belt and</u> has a network of Green Wedges and Green Fingers allocated on the Policies Map.</p> <p><u>The purposes of the Green Belt are to:</u></p> <ul style="list-style-type: none"> <li>• <u>check the unrestricted sprawl of large built-up areas;</u></li> <li>• <u>prevent neighbouring towns merging into one another;</u></li> <li>• <u>assist in safeguarding the countryside from development;</u></li> <li>• <u>preserve the setting and special character of historic towns, and</u></li> <li>• <u>assist in urban regeneration by encouraging the recycling of derelict and other urban land.</u></li> </ul> <p>The roles of the Green Wedges are to:.....</p> <p>.....(b) provide Green Infrastructure, including open spaces for sport, recreation and quiet contemplation, <u>wildlife corridors, footpaths, cycleways and bridleways, and rivers, canals, ponds, lakes and other bodies of water;</u>.....</p> <p>..... The roles of the Green Fingers are to:.....</p> <p>.....(b) provide Green Infrastructure, <u>including</u> wildlife corridors, <u>footpaths, cycleways and bridleways; and rivers, canals, ponds, lakes and other bodies of water;</u>.....</p>



Mod No.	Policy No./Paragraph No.	Modification
MM9 cont.	Policy WE3 Page 86 cont.	<p><u>Compensation for the harm will be required.</u></p> <p><u>Locally Designated Sites of Wildlife Value</u></p> <p><u>3. Development on, or which negatively affects, a Local Wildlife Site or Local Nature Reserve, as shown on the Policies Map, will not be supported unless:</u></p> <p><u>(a) local development needs significantly outweigh the nature conservation value of the site; and</u></p> <p><u>(b) the development provides appropriate avoidance or mitigation and, as a last resort, provides compensation measures to offset any detriment to the nature conservation interest on the site.</u></p>
	WE3 Implementation New para after para 10.26 Page 86	<p><u>Designated biodiversity and geodiversity assets are allocated on the Policies Map. The order of asset type follows the hierarchy in this policy (i.e. within the district Sites of Special Scientific Interest are the highest order asset type). Non-designated assets of biodiversity and geodiversity importance, which extend the geodiversity and network of biodiversity and open spaces across the district, are identified in Evidence Base studies.</u></p>
	WE3 Implementation Para 10.27 Page 86	<p>.....in accordance with their level of <u>international</u>, national, regional or local importance.</p>
MM10	<p>Policy WE3a (new Policy after WE3)</p> <p><b>(continues on next page)</b></p>	<p><u>WE3a Safeguarding Wildlife Sites beyond the District Boundary</u></p> <p><u>Development in the plan area, either alone or in combination with other plans or projects, may have an adverse effect on the integrity of the Epping Forest Special Area of Conservation (SAC) as a result of disturbance from recreational activities or air pollution from increased vehicle movements.</u></p> <p><u>Where significant effects on the Epping Forest SAC alone or in combination are likely, a project level Habitats Regulation Assessment may be required.</u></p> <p><u>Development may also have an adverse effect on Hatfield Forest Site of Special Scientific Interest (SSSI) as a result of disturbance from recreational activities.</u></p> <p><u>In relation to Epping Forest and/or Hatfield Forest, development will be required if necessary to include avoidance or mitigation measures as set out in the respective Mitigation Strategies to be adopted by the Council which may include:</u></p> <p><u>(a) _____ provision of informal greenspace for recreation within the application site</u></p> <p><u>(b) _____ provision, or a contribution towards, suitable alternative natural greenspace off-site</u></p>

Mod No.	Policy No./Paragraph No.	Modification
<b>MM10 cont.</b>	Policy WE3a (new Policy after WE3) <b>cont.</b>	<p><u>(c) the improvement of existing nearby recreational opportunities</u></p> <p><u>(d) financial contributions towards strategic access management measures in Epping Forest or Hatfield Forest as appropriate</u></p> <p><u>(e) financial contributions or other measures to improve air quality in Epping Forest</u></p> <p><u>(f) monitoring of the impacts of new development on these wildlife sites to inform the refinement of any necessary mitigation requirements.</u></p> <p><u>Where necessary, contributions towards the measures set out in the Epping Forest Mitigation Strategy will be sought from developments within the Epping Forest Recreational Zone of Influence (ZOI) in order to mitigate and avoid in-combination effects on the Epping Forest Special Area of Conservation (SAC). If necessary contributions will also be sought to address any in-combination air pollution impacts.</u></p>
	Policy WE3a Justification	<p><u>Whilst there are no European designated sites within the district boundary, there are three which are located within sufficient proximity that there could be impact pathways arising from development in the Local Plan such that the integrity of the sites could be affected. These are Epping Forest SAC, Wormley-Hoddesdonpark Woods SAC and the Lee Valley SPA/Ramsar site. However, of these the habitats regulation assessment produced in support of the plan demonstrates that only in the case of Epping Forest SAC is an adverse effect likely unless satisfactory avoidance or mitigation is put in place. Adverse effects may arise due to disturbance from recreational activities as a result of the additional population in the area and air pollution from additional vehicle movements through the forest. In addition, adverse effects may arise in the case of Hatfield Forest, a nationally designated SSSI, due to disturbance from recreational activities.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
	Policy WE3a Implementation	<p><u>A visitor survey undertaken in 2017 found that 75% of visitors to Epping Forest arise from within 6.2 km of its boundary which can be considered the core recreational catchment area or 'zone of influence'. This only involves a small part of the south of the district. In the case of Hatfield Forest, however, the catchment area extends to 14.6 km, which includes the whole of the district and all four proposed Garden Town Communities. Further visitor surveys will be undertaken from time to time for monitoring purposes and may result in changes to these zones of influence.</u></p> <p><u>In order to avoid potentially adverse effects on these two sites due to recreational pressure from new residents, the Councils concerned are working with Natural England and the site owners to develop suitable mitigation strategies which will be formally adopted as supplementary planning guidance in due course. If necessary, new development in the district will be expected to include or provide the avoidance and/or mitigation measures set out in these strategies which will be updated from time to time to take account of new scientific evidence or monitoring information. In the case of the large housing site East of Harlow, which lies outside the zone of influence of Epping Forest SAC but well within that of Hatfield Forest SSSI, strategic green infrastructure will be required within the development to maximise its self-sufficiency for informal recreation and this may meet the necessary requirements.</u></p> <p><u>In terms of air quality, it is estimated that 99% of all additional vehicle movements through Epping Forest SAC during the plan period will arise from growth in Epping Forest district rather than the neighbouring authorities including Harlow. Natural England agree that growth in Harlow district will have a small or negligible effect and in this instance it would be reasonable for air quality mitigation measures to be the responsibility of Epping Forest district. Nevertheless, in case the position changes in future, criterion (d) is included in Policy WE3a above.</u></p> <p><u>Policy WE3a will be implemented in the context of co-operation between the Councils and other bodies concerned with the protection of each site. Harlow Council is committed to this co-operation and, following full discussion and agreement, will formally adopt supplementary planning guidance setting out any necessary requirements for development within its district.</u></p>
<b>CHAPTER 11</b>		
MM11	Policy SIR1 Page 91	<p>.....The Policies Map identifies infrastructure items which <u>require safeguarding or</u> have a land use implication....</p> <p><i>See change to Policies Map in separate schedule.</i></p>
	SIR1 Justification Para 11.18 Page 93	<p>The Princess Alexandra Hospital NHS Trust <del>is currently considering options to meet its future service requirements including the potential option to relocate to an alternative location in the Harlow and Gilston Garden Town. Two potential sites are being considered, the first in the Gilston area to the north and the second to the east of Harlow within the Epping Forest district. The location will be determined through a Strategic Outline Business Case.</del> <u>has approved a preferred way forward for the provision of a new hospital. This option comprises the development of a new state of the art local acute hospital at land within the Epping Forest portion of the East of Harlow Garden Community.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
	SIR1 Justification New paras after para 11.18 Page 94	<p><u>In the event that the Hospital is relocated, land at Princess Alexandra Hospital may be redeveloped for housing with a capacity of up to 550 homes (see Policy HS2). In the event that the Hospital is not relocated and remains in situ, the redevelopment of the site for healthcare purposes will be supported and taken forward in accordance with the agreed master plan to be prepared by the Hospital Trust. Under the latter option, surplus land may be identified which could accommodate approximately 100 new homes. The purpose of the master plan would be to provide certainty for the Hospital Trust, to allow for the phased delivery of its strategic long-term objectives for healthcare provision and investment.</u></p> <p><u>New and improved healthcare facilities play an important role in sustaining the Harlow and Gilston Garden Town and the Council will work with the hospital and all relevant parties to help deliver this.</u></p>
	SIR1 Justification New paras after para 11.23 Page 94	<p><u>The Council will seek the best use of existing infrastructure as well as providing the best possible opportunity to provide additional infrastructure capacity. The Council also supports the use of smart energy solutions to support low carbon developments. Developments should consider the incorporation of energy storage, demand side response, smart metering and smart heating controls to optimise the efficient use of heating and power systems.</u></p> <p><u>The Council recognises that decarbonisation may lead to increased uptake of heat pumps, electric heating, electric vehicles and renewable energy. Developments should seek to ensure that electrical infrastructure is designed to accommodate a future increase in electricity demand and renewable energy generation through appropriately sized substations and consideration of three phase supply to domestic properties.</u></p>
	SIR1 Justification New para after para 11.30 Page 95	<p><u>When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements to the satisfaction of the relevant water and sewerage undertaker will be completed prior to occupation of the development.</u></p>
<b>MM11 cont.</b>	SIR1 Implementation New para after para 11.34 Page 96	<p><u>Household Waste Facilities</u></p> <p><u>The Council will work together with Essex County Council to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves Harlow. Collaboration will be required with Hertfordshire County Council in respect of waste needs for the wider Garden Town area. Any facilities should be of a sufficient size and capacity that meets the needs of this growth and situated within an easily accessible location within the catchment areas of the new Garden Town communities.</u></p>
<b>MM12</b>	Policy SIR2 Page 96	<p>.....</p> <p><u>5. 6. Cambridge Road where it enters Harlow from Hertfordshire to the east of the District</u></p> <p><u>6. 7. Vehicular and pedestrian access points to the north of the Town Centre</u></p> <p><u>7. 8. Vehicular and pedestrian access points at as you first enter the strategic employment sites</u></p> <p>.....</p>

Mod No.	Policy No./Paragraph No.	Modification
<b>CHAPTER 13</b>		
<b>MM13</b>	Policy PL1 Page 103	<p>.....(a) it is supported by a design rationale based on an understanding and analysis of local context and character, taking into consideration the adopted Harlow Design Guide Supplementary Planning Document (SPD), the Harlow and Gilston Garden Town <del>Spatial</del> Vision and Design <del>Charter</del> <u>Guide, the services and access chapter of the Essex Design Guide,</u> and relevant national guidance;</p> <p>(b) it protects, enhances or improves local distinctiveness <u>without restricting style and innovation, whilst</u> taking account of local character <u>and context, including</u> patterns of development, urban form and landscape character, Green Infrastructure including trees and landscaping, building typology, <del>detailing and materials front boundary treatments</del> and the historic environment;</p> <p>(<del>dc</del>) it responds to the scale, height, massing, architectural detailing, <u>and materials and front boundary treatments</u> of the surrounding area, <u>and</u> is visually attractive <del>and respects its context without restricting style and innovation;</del></p> <p>(<del>ed</del>) it provides appropriate physical, legible and safe connections with surrounding streets, paths, neighbouring development and Green Infrastructure;</p> <p>.....</p>
<b>MM14</b>	Policy PL3 Page 105	New development will be expected to deliver high standards of sustainable design and construction and efficient energy usage, <u>taking account of predicted changes to heating and cooling requirements as a result of climate change.</u> <del>Such development will be supported where it meets or exceeds the minimum standards required by Building Regulations.</del>
<b>MM14 cont.</b>	PL3 Justification Para 13.16 Page 105	This policy encourages applicants to consider the impact of their development and seek ways to address the effects, <u>above and beyond those measures required by Building Regulations. The preferable amount by which the minimum Building Regulations standards should be exceeded is set out in the Implementation section of this policy, and is based on policy recommendations of the UK Green Building Council which were, in part, derived from the now-defunct Code for Sustainable Homes Level 4 standard.</u>
	PL3 Justification New para after existing para 13.16 Page 105	<u>This policy assists in the delivery of the Local Plan Strategic Vision, which states that, by 2033, new development will mitigate and adapt to the effects of climate change. It also reflects legislation enacted in 2019, which amends the Climate Change Act 2008 so that, in 2050, UK greenhouse gas emissions are at least 100% lower than the 1990 baseline, as opposed to the original Act which required a reduction of at least 80%.</u>

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Mod No.	Policy No./Paragraph No.	Modification
	PL3 Implementation Para 13.17 Page 105	<p>The Building Regulations set out the minimum requirements for the conservation of fuel and power. <u>Development will be encouraged to exceed the minimum standards required by Building Regulations. Where exceeded, the amount by which the minimum standards should be exceeded is preferably at least 19%. The Council supports development that follows the principles of sustainable construction, and encourages developers to deliver schemes which adopt a fabric-first approach to development and meet the performance and quality set by appropriate standards, such as Passivhaus, Home Quality Mark (HQM) and BREEAM UK New Construction 2018.</u> <del>The associated guidance suggests measures to reduce energy consumption and carbon dioxide emissions, which should include the consideration of:</del></p> <ul style="list-style-type: none"> <li><del>(a) — appropriate layout and building orientation to maximise solar gain in the winter;</del></li> <li><del>(b) — the use of Green Infrastructure, such as trees and rain gardens;</del></li> <li><del>(c) — efficient use of all roof and vertical surfaces for the installation of low carbon technologies and green roofs;</del></li> <li><del>(d) — integrating passive ventilation, such as wind catchers, or low energy options where mechanical ventilation or cooling is required;</del></li> <li><del>(e) — generating energy from on-site renewable or low carbon energy systems;</del></li> <li><del>(f) — the use of local, sustainable and energy efficient materials; and</del></li> <li><del>(g) the re-use of existing resources.</del></li> </ul>
	PL3 Implementation New paras after para 13.17 Page 105  <b>(continues on next page)</b>	<p><u>Development proposals must demonstrate how the reduction of energy consumption and carbon dioxide emissions is being considered. The wellbeing of building occupants must also be addressed within the design and layout, by minimising risks of overheating and providing adequate daylight and ventilation. These factors can be addressed by:</u></p> <ul style="list-style-type: none"> <li><u>(a) — incorporating a range of natural heating and cooling measures as part of the design and layout, including passive ventilation (or low-energy options where mechanical cooling is required) and ensuring appropriate building layout and orientation;</u></li> <li><u>(b) — incorporating the use of Green Infrastructure, such as trees and rain gardens;</u></li> <li><u>(c) — including passive design measures such as window sizing, thermal mass, building orientation and shading;</u></li> <li><u>(d) — generating energy from on-site renewable or low-carbon energy systems, including on-site electricity generation for major development;</u></li> <li><u>(e) — ensuring the efficient use of all roof and vertical surfaces for the installation of low carbon technologies and green roofs;</u></li> </ul>

Mod No.	Policy No./Paragraph No.	Modification
MM14 cont.	PL3 Implementation New paras after para 13.17 Page 105 cont.	<p><u>(f) considering room layout, depth, height and window opening for optimum daylighting.</u></p> <p><u>(g) evaluating the risk of overheating and evidencing through modelling to support the design decisions, such as the use of dynamic simulation and thermal modelling to analyse a building's performance in terms of energy usage and internal temperatures;</u></p> <p><u>(h) maintaining good indoor air quality by providing sufficient ventilation to purge any pollutants such as emissions of formaldehyde &amp; volatile organic compounds (VOCs) from building materials and surface finishes, as well as stale air from other activities such as cooking, bathing, etc.;</u></p> <p><u>(i) using local, sustainable and energy-efficient construction materials which consider adaptation to and mitigation of the impacts of climate change;</u></p> <p><u>(j) re-using existing resources.</u></p> <p><u>Where a low-carbon district heating scheme is proposed, the Council will expect the scheme to demonstrate that any proposed heating and cooling systems have been selected in line with the following order of preference:</u></p> <p><u>(a) if possible, connection with heat distribution networks which exist at the time;</u></p> <p><u>(b) site-wide heat network fuelled by renewable energy sources;</u></p> <p><u>(c) communal network fuelled by renewable energy sources;</u></p> <p><u>(d) individual Air Source Heat Pump.</u></p>
MM15	<p><u>PL3a Green Belt (new policy before PL4 on Page 106)</u></p> <p><b>(continues on next page)</b></p>	<p><u>Development on land designated as Green Belt will be severely restricted to ensure it continues to fulfil the five purposes of the Green Belt. The essential characteristics of Green Belts are their openness and their permanence. Substantial weight will be given to any harm to the Green Belt when assessing planning applications.</u></p> <p><u>New buildings are inappropriate in the Green Belt with the following exceptions:</u></p> <p><u>a. buildings for agriculture and forestry;</u></p> <p><u>b. appropriate facilities for outdoor sport, outdoor recreation and cemeteries;</u></p> <p><u>c. the extension and alteration of an existing building providing the original building is not disproportionately increased in size;</u></p> <p><u>d. a replacement building for the same use providing it is not materially larger;</u></p> <p><u>e. limited affordable housing for local community needs.</u></p> <p><u>The following forms of development are not inappropriate providing they preserve the openness of the Green Belt and do not conflict with its purposes:</u></p> <p><u>a. limited infilling or the partial or complete redevelopment of previously developed land;</u></p> <p><u>b. mineral extraction;</u></p> <p><u>c. engineering operations;</u></p> <p><u>d. local transport infrastructure which requires a Green Belt location;</u></p> <p><u>e. the re-use of buildings of permanent and substantial construction;</u></p> <p><u>f. development under a Community Right to Build Order.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
MM15 cont.	<p><u>PL3a Green Belt (new policy before PL4 on Page 106)</u> cont.</p>	<p><u>Other development is inappropriate development in the Green Belt and will only be permitted in very special circumstances.</u></p> <p><u>Such circumstances only exist if the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</u></p> <p><u>Development must not adversely affect the role or function of adjacent land which forms part of a Green Wedge or Green Finger.</u></p>
	<p><u>PL3a Justification</u></p>	<p><u>The Green Belt is a national policy designation, the fundamental aim of which is to prevent unrestricted urban sprawl as well as a number of other purposes as set out in national planning policies.</u></p> <p><u>Since the Ministry of Housing and Local Government Circular in 1955, which recommended that Local Planning Authorities should establish Green Belts, the Green Belt has had great importance attached to it by subsequent Governments. As such, it is protected from inappropriate development through both national and local planning policies. The construction of new buildings and other development which does not meet the criteria of this policy would, therefore, not be supported, unless very special circumstances exist.</u></p> <p><u>Harlow lies within the Metropolitan Green Belt which surrounds London and, although only a small amount of designated land lies within the district boundary, its protection is important to preserve the character and setting of the town.</u></p> <p><u>The Green Belt links with the wide-ranging Green Infrastructure in the district, including the Green Wedges and Green Fingers. The Green Belt in Harlow also provides a physical link with the overall Green Belt and wider countryside in the surrounding Epping Forest and East Hertfordshire districts.</u></p> <p><u>The purpose of this policy is to continue to protect the Green Belt in Harlow from inappropriate development, as such development would conflict with the Green Belt purposes and be harmful to the Green Belt.</u></p> <p><u>As detailed in other Local Plan policies, Harlow's Green Wedges and Green Fingers make a significant and important contribution to the district's Green Infrastructure, by providing a number of roles and functions for the benefits of visitors, residents and wildlife.</u></p> <p><u>One of the functions is to provide access to wider countryside and other open spaces and, therefore, most Green Belt land in Harlow adjoins, or is near to, land designated as Green Wedge or Green Finger. To assist with the protection of the Green Wedges and Green Fingers afforded by other Local Plan policies, this policy ensures that any development in the Green Belt does not adversely affect the roles and functions of adjoining or nearby Green Wedge or Green Finger land.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
MM15 cont.	<u>PL3a Implementation</u>	<p><u>The purposes of the Green Belt are set out in national planning policies, as follows:</u></p> <ol style="list-style-type: none"> <li><u>1. to check the unrestricted sprawl of large built-up areas;</u></li> <li><u>2. to prevent neighbouring towns merging into one another;</u></li> <li><u>3. to assist in safeguarding the countryside from encroachment;</u></li> <li><u>4. to preserve the setting and special character of historic towns; and</u></li> <li><u>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</u></li> </ol> <p><u>Whilst these purposes are not weighted in terms of significance, national planning policies recognise that the fundamental aim of the Green Belt is to provide permanently open land to prevent unrestricted urban sprawl.</u></p> <p><u>Small-scale development can include householder applications, sports related development, recreation, cemeteries and community uses.</u></p> <p><u>For development relating to renewable energy, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.</u></p>
MM16	Policy PL4 Page 106	<p>.....</p> <p>(b) it is for <del>essential</del> infrastructure, <u>including and</u> local transport infrastructure, which <del>must</del> demonstrates a requirement for a Green Wedge or Green Finger location <u>and demonstrates it is of benefit to the wider community;</u></p> <p>(c) it is for the <u>alteration, extension or</u> replacement of buildings, <del>provided that the new building/buildings are in the same use and not more harmful than what is being replaced;</del></p> <p><del>(d) it constitutes strategic infrastructure development which can demonstrate that it is of benefit to the wider community.</del></p> <p>.....</p> <p>(<del>e</del> <u>d</u>) it demonstrates that the roles and functions <u>and historic significance</u> of the Green Wedges and Green Fingers <u>(as set out in policy WE2)</u> are preserved, enhanced and not adversely affected; and</p> <p>(<del>f</del> <u>e</u>) it demonstrates.....</p> <p><u>Where development includes replacement uses, redevelopment, extensions or alterations, it must meet all the following criteria:</u></p> <p>(f) <u>it does not result in a greater negative impact on the roles and functions of the Green Wedges and Green Fingers than the existing development;</u></p> <p>(g) <u>it does not result in disproportionate additions to the original building(s); and</u></p> <p>(h) <u>any replacement buildings must be in the same use.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
MM17	Policy PL8 Page 112	<p>Development should contribute to and enhance biodiversity or geodiversity assets <u>to ensure a net gain in biodiversity.....</u></p> <p>.....The greater the significance of the asset, the greater the weight that is given to the asset's protection. <u>Distinction will be made between the hierarchy of international, national and locally designated and non-designated sites so that the level of protection afforded is consistent with their status.</u></p> <p>(a) it <del>creates new biodiversity and protects geodiversity assets and creates links to</del> <u>conserves and enhances</u> existing biodiversity and geodiversity assets;</p> <p>(b) <u>where (a) is not possible</u>, it includes <del>the protection and enhancement of</del> <u>appropriate and effective measures to mitigate the negative effects on</u> existing biodiversity and geodiversity assets;</p> <p>(c) <u>where there is a residual impact, it includes provision for compensatory measures to be secured off-site;</u></p> <p><del>(e d) where it can be demonstrated that protection and enhancement of it creates new biodiversity and creates links to</del> existing biodiversity and geodiversity assets. <del>is not possible, appropriate measures must mitigate the negative effects on these assets</del></p>
MM18	Policy PL9 Page 113	<p>All development proposals must minimise and, where possible, reduce all forms of pollution and contamination. <u>For air quality, the acceptability or otherwise of a proposal will be determined with reference to the relevant limit values or National Air Quality Objectives as they relate to human health or biodiversity.....</u></p> <p>..... Where it can be demonstrated that pollution and/or contamination is unavoidable, appropriate measures must mitigate the negative effects of the development. <u>Where adequate mitigation cannot be provided, development will not normally be permitted.</u></p>
	PL9 Implementation Para 13.55 Page 114	<p>The Council <del>may will</del> require <del>assessments of any pollution and/or contamination—</del> <u>a Preliminary Risk Assessment of land considered to be contaminated</u> to be undertaken and submitted, which identify any existing pollution and/or contamination, and the impacts of the development and any necessary mitigation and/or compensatory measures. ....</p> <p>.....The Council may also impose conditions to control and manage pollution and contamination levels. <u>Further investigations, assessments, long-term maintenance regimes and validation reports may also be required if land is contaminated.</u></p>
	PL9 Implementation New para after para 13.55 Page 114	<p><u>Where contaminated sites have the potential to mobilise contaminants, or where there is a high-risk development proposal within a vulnerable ground water area, mitigation measures must ensure the risks to groundwater are minimised.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
MM19	Policy PL10 Page 114-115	<p>.....<del>4</del>4. Water Quality Development must not <del>adversely affect</del> <u>cause deterioration to</u> water quality, including quality of waterways and other bodies of water, identified Source Protection Zones (SPZ), Aquifers and all other groundwater. <u>Development must aim to improve such water quality.</u></p> <p>New development adjacent to water courses should seek to include restoration and deculverting. The culverting of water courses should be avoided. <u>Where the applicant can demonstrate that deculverting or other river enhancements are unfeasible, a financial contribution will be sought to restore another section of the same watercourse.</u></p> <p><u>New development adjacent to designated main rivers must provide and maintain an undeveloped buffer zone of at least eight metres, to the watercourse. Such development must also include a long-term scheme to protect and enhance the conservation value of the watercourse.</u></p> <p>.....<del>32</del>32(a) it must not increase the risk of flooding elsewhere <u>and must aim to reduce flood risk overall;</u> .....</p> <p>.....<del>32</del>32 (c) <del>flood finished floor</del> levels of development in Flood Zones 2 and 3 should be situated above the 1% (1 in 100 years) plus climate change predicted maximum water level, plus a minimum <del>watertight depth finished floor level</del> <u>of 300mm above the normal predicted water level;</u> .....</p> <p>.....<del>2</del>2 (d) <u>proposed development in Flood Zone 3b must be 'water compatible' or 'essential' development.</u>.....</p> <p>.....<del>32</del>32 (gh) flood flow routes should be <del>preserved</del> <u>configured to enable surface water to drain;</u>.....</p> <p>.....<del>32</del>32 (hi) where necessary, planning permission will be conditional upon <del>flood protection and/or runoff control measures being operative before other works.</del> <u>the submission and approval of a drainage management strategy that addresses all forms of flood risk.</u></p> <p><u>Development within identified Critical Drainage Areas may, depending on the outcomes of a specific flood risk assessment, be required to contribute to funding for the delivery of appropriate flood alleviation schemes.</u>.....</p> <p>.....<del>4-3</del><b>4-3 Waste Water and Sustainable Drainage Systems (SuDS)</b></p> <p><u>Development proposals should identify how there is sufficient surface water, foul drainage and treatment capacity which can serve the development. Surface and foul water systems must be separate.</u></p> <p><u>The use of SuDS in all development proposals, including the retrofitting of SuDS, is encouraged and will be supported.</u> Where SuDS are required, the drainage scheme must meet the following criteria:.....</p> <p>.....<del>4-3</del>4-3 (c) achieve <del>greenfield</del> runoff rates <u>in line with the guidance of the non-statutory technical standards for sustainable drainage;</u>.....</p>

Mod No.	Policy No./Paragraph No.	Modification
<b>MM19 cont.</b>	PL10 Justification Para 13.57 Page 116	This policy will ensure that the quality of drinking water is maintained, avoiding harmful polluting developments which affect its quality. <u>The requirement for development adjacent to designated main rivers to provide an undeveloped buffer zone will ensure the enhancement and protection of local biodiversity, provide space for flood water and provide access for maintenance. The necessity for a scheme to protect and enhance the conservation value of a watercourse, and to aim to improve water quality, is required by the Water Framework Directive and/or the Thames River Basin Management Plan.</u>
	PL10 Justification New paras after para 13.61 Page 116	<u>A number of Critical Drainage Areas have been identified based on the results of the Harlow Surface Water Management Plan. The risk of surface water flooding in these areas needs to be reduced and drainage improved.</u>  <u>The requirement that any proposed development in Flood Zone 3b must be 'water compatible' or 'essential' development is in accordance with national guidance and the Strategic Flood Risk Assessment.</u>
	PL10 Implementation New paras after para 13.63 Page 116	<u>The Water Cycle Study emphasises the importance of non- residential development meeting a level of BREEAM compliance regarding water efficiency. The meeting of BREEAM 'Excellent' rating for water efficiency in non- residential buildings is, therefore, supported.</u>  <u>Harlow contains a significant number of older buildings which will not be as efficient with water use as modern buildings. Measures to retrofit such buildings to increase their energy efficiency are, therefore, encouraged.</u>
	PL10 Implementation Para 13.67 Page 117	.....(d) where possible, flood storage should be maximised through the use of Green Infrastructure <u>and by providing level- for- level, volume-for-volume floodplain compensation for development within the 1-in-100-year (plus climate change) extent.</u>
	PL10 Implementation Para 13.68 Page 117	In terms of surface water flooding, the general aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable: <del>1. into the ground (infiltration);</del> <del>2. to a surface water body;</del> <del>3. to a surface water sewer, highway drain, or another drainage system;</del> <del>4. to a combined sewer.</del> <u>1. store rainwater for later use;</u> <u>2. use infiltration techniques, such as porous surfaces in non- clay areas;</u> <u>3. attenuate rainwater in ponds or open water features for gradual release, including the use of SuDS;</u> <u>4. attenuate rainwater by storing in tanks or sealed water features for gradual release, including the use of SuDS;</u> <u>5. discharge rainwater direct to a watercourse;</u> <u>6. discharge rainwater to a surface water sewer/drain;</u> <u>7. discharge rainwater to the combined sewer.</u>

Mod No.	Policy No./Paragraph No.	Modification
MM19 cont.	PL10 Implementation New paras after para 13.68 Page 117	<p><u>It is expected that space is created for flooding to occur by restoring the functional floodplain, wherever possible, through a reduction of development footprint within Flood Zone 3b.</u></p> <p><u>Water-compatible development and essential development are referred to in this policy. As defined by national guidance, water-compatible development includes flood control infrastructure, sewage transmission and pumping stations, navigation facilities and water-based recreation (excluding sleeping accommodation). Essential development includes essential transport infrastructure which has to cross the area at risk, wind turbines and essential utility infrastructure, such as power stations, which requires the location for operational reasons.</u></p>
	PL10 Implementation Para 13.72 Page 117	<p>.....The Essex SuDS Design Guide provides guidance on local standards for water quality and water quantity from developments and guidance on SuDS design. <u>Developers should also consider national guidance on natural flood management techniques and working with natural processes, which seek to protect, restore and emulate the natural functions of catchments, floodplains and rivers.</u></p>
	PL10 Implementation New paras after para 13.72 Page 117	<p><u>All proposed development must engage the actions and measures as specified by the Thames River Basin Management Plan, where feasibly possible and reasonable. Developers should liaise with the Environment Agency on such actions and measures.</u></p> <p><u>Appropriate arrangements for foul water must be identified where the local public sewer network does not have adequate capacity. Developers must demonstrate how any upgrades of the existing sewerage network, to alleviate capacity issues, would be delivered in advance of the development. New development must connect to mains foul drainage, but a foul drainage assessment may be required if non-mains foul drainage is proposed.</u></p>
MM20	Policy PL11 Page 118	<p>.....(d) the extent to which the development would enhance, <u>or better reveal</u>, the significance of the heritage asset;.....</p> <p>.....Where development affects a heritage asset or its setting, <del>an appropriate management plan, which includes</del> a Heritage Statement; must be <del>in place</del> <u>submitted</u> to conserve and enhance the asset and its setting.</p> <p><u>Where proposals affect or are adjacent to sites of known or suspected archaeological interest a desk-based or field evaluation should be submitted.</u></p> <p>Where the heritage asset is at risk and the development would conflict with other policies of the Local Plan, it must be demonstrated that the development <u>represents the asset's optimum viable use and</u> is necessary to secure the future conservation of the asset and that any negative impacts are outweighed.</p>

Mod No.	Policy No./Paragraph No.	Modification
	PL11 Implementation Para 13.79 Page 119	National policies and guidance outline the rationale behind the designation of heritage assets, with special architectural or historic interest being at the core of any designation decision. <u>Proposals for enabling development would be assessed having regard to Historic England's latest guidance on enabling development.</u> National policies also set out the hierarchy of significance of historic assets.
<b>CHAPTER 14</b>		
MM21	Policy H3 Page 127	<p>.....(e) effective measures are proposed to minimise the effects of noise and disturbance.</p> <p><u>The effectiveness of this policy and the one-in-five restriction should be reviewed two years after the adoption of this Local Plan.</u></p>
MM22	Policy H5 Page 129	<p><del>All new dwellings should be at least Building Control Regulations Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs.</del></p> <p><u>To ensure that new homes are both accessible and adaptable to meet the changing needs of occupants:</u></p> <p><u>(a) all new dwellings should be at least Building Regulations Part M4(2) standard for accessible and adaptable homes: and</u></p> <p><u>(b) in addition, major residential development, a suitable proportion of should provide Building Control Regulations Part M4(3) standard dwellings for wheelchair users should be provided based on. The proportion is set out in the latest Strategic Housing Market Assessment (SHMA) or other appropriate evidence directly related to the housing needs of Harlow.</u></p> <p>The provision of specialist housing developments will be supported on appropriate sites that will meet the needs of older people and other groups.</p> <p><u>Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy will new development be exempt from these requirements.</u></p>
	H5 Justification New para before para 14.23 Page 129	<p><u>National planning guidance states that a policy requiring wheelchair accessible dwellings should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Consequently, the Council will negotiate a proportion of wheelchair adaptable (market and affordable housing) and/or wheelchair accessible (affordable housing only) dwellings, as appropriate, based on the latest Strategic Housing Market Assessment (SHMA) or other additional appropriate evidence directly related to Harlow's housing needs.</u></p>

Mod No.	Policy No./Paragraph No.	Modification																																																					
	H5 Justification New paras after para 14.25 Page 129	<p><u>Harlow has an ageing population, which has important implications for the future delivery of housing over the Local Plan period. Essex County Council (ECC) is the provider of social care in Harlow. ECC's approach to Independent Living (Extra Care) encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. For Harlow, the evidence base (the Housing LIN SHOP@ tool ) predicts a need for 104 units of Extra Care accommodation (i.e. 'whole market demand') in addition to the current Extra Care provision in the district. This provision is in addition to the requirement for other specialist accommodation such as sheltered housing.</u></p> <p><u>It is ECC's intention to facilitate the development of at least one 60 unit Extra Care scheme in the next five years in Harlow to meet Adult Social Care demand in the district. In addition to the Evidence Base mentioned previously, ECC will be publishing an updated Market Position Statement in 2019 setting out its intentions for the provision of Extra Care across the county, which will also inform this Local Plan. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care across the county. Extra Care schemes are part of a wider accommodation pathway to enable older people to remain as independent as possible, with the right housing and support to meet their needs.</u></p>																																																					
MM23	Policy H6 Page 130	<p><del>A range of housing types and sizes, across a range of tenures, must be provided in major residential development. The Council will support community-led housing developments on appropriate sites. On new housing developments, an appropriate mix of housing tenures, types and sizes will be expected to be provided, in order to create balanced communities which reflect Harlow's housing needs and local character. To achieve this, developers should take into account the latest Strategic Housing Market Assessment, or other additional appropriate evidence directly related to Harlow's housing needs.</del></p> <p><u>Where appropriate and in accordance with policies in the Local Plan, the following types of housing should be provided:</u></p> <p>(a) <u>affordable housing;</u>  (b) <u>accessible and adaptable housing;</u>  (c) <u>self-build and custom-build housing plots;</u>  (d) <u>community-led housing.</u></p>																																																					
	Fig. 14.1: H6 Justification Page 130	<p>Range of housing types, sizes and tenures</p> <table border="1" data-bbox="589 1011 1227 1273"> <thead> <tr> <th colspan="2">MARKET HOUSING</th> <th>Dwellings</th> <th>%</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Flat</td> <td>1 Bedroom</td> <td><u>170</u></td> <td><del>6.8</del> <u>6.6</u></td> </tr> <tr> <td>2+ Bedrooms</td> <td><u>30</u></td> <td>1.2</td> </tr> <tr> <td rowspan="4">House</td> <td>2 Bedrooms</td> <td><u>610</u></td> <td><del>24.4</del> <u>23.9</u></td> </tr> <tr> <td>3 Bedrooms</td> <td><u>1,690</u></td> <td><del>67.6</del> <u>66.3</u></td> </tr> <tr> <td>4 Bedrooms</td> <td><u>50</u></td> <td><del>0.02</del> <u>2.0</u></td> </tr> <tr> <td>5+ Bedrooms</td> <td>-</td> <td>-</td> </tr> <tr> <td colspan="2"><u>Total Market Housing</u></td> <td><u>2,550</u></td> <td></td> </tr> </tbody> </table> <table border="1" data-bbox="1285 1011 1946 1241"> <thead> <tr> <th colspan="2">AFFORDABLE HOUSING</th> <th>Dwellings</th> <th>%</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Flat</td> <td>1 Bedroom</td> <td><u>100</u></td> <td><del>2.9</del> <u>3.0</u></td> </tr> <tr> <td>2+ Bedrooms</td> <td><u>550</u></td> <td><del>16.4</del> <u>16.4</u></td> </tr> <tr> <td rowspan="3">House</td> <td>2 Bedrooms</td> <td><u>940</u></td> <td><del>27.6</del> <u>28.1</u></td> </tr> <tr> <td>3 Bedrooms</td> <td><u>1,400</u></td> <td><del>41.1</del> <u>41.8</u></td> </tr> <tr> <td>4+ Bedrooms</td> <td><u>360</u></td> <td><del>10.5</del> <u>10.7</u></td> </tr> <tr> <td colspan="2"><u>Total Affordable Housing</u></td> <td><u>3,350</u></td> <td></td> </tr> </tbody> </table>	MARKET HOUSING		Dwellings	%	Flat	1 Bedroom	<u>170</u>	<del>6.8</del> <u>6.6</u>	2+ Bedrooms	<u>30</u>	1.2	House	2 Bedrooms	<u>610</u>	<del>24.4</del> <u>23.9</u>	3 Bedrooms	<u>1,690</u>	<del>67.6</del> <u>66.3</u>	4 Bedrooms	<u>50</u>	<del>0.02</del> <u>2.0</u>	5+ Bedrooms	-	-	<u>Total Market Housing</u>		<u>2,550</u>		AFFORDABLE HOUSING		Dwellings	%	Flat	1 Bedroom	<u>100</u>	<del>2.9</del> <u>3.0</u>	2+ Bedrooms	<u>550</u>	<del>16.4</del> <u>16.4</u>	House	2 Bedrooms	<u>940</u>	<del>27.6</del> <u>28.1</u>	3 Bedrooms	<u>1,400</u>	<del>41.1</del> <u>41.8</u>	4+ Bedrooms	<u>360</u>	<del>10.5</del> <u>10.7</u>	<u>Total Affordable Housing</u>		<u>3,350</u>	
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Mod No.	Policy No./Paragraph No.	Modification
MM24	Policy H8 Page 132	<p><del>Major residential development must provide</del> <u>In residential developments of more than 10 dwellings, it will be expected that</u> at least 30% affordable housing <u>is provided.</u></p> <p>Reduction of this percentage <del>-will require an independent viability assessment.</del> <u>may be permitted for viability reasons. Any reduction or non-agreement between the developer and the Council will require an independent viability assessment.</u></p> <p><u>Affordable housing within a development will normally be provided on-site unless exceptional circumstances should require it to be provided elsewhere with the agreement of the Council. Applicants will be required to submit justification for off-site construction or financial contributions.</u></p> <p><u>Affordable housing provision will be expected to have regard to the recommended tenure mix identified in the latest Evidence Base on housing need and affordable housing products defined in current national planning policies.</u></p> <p><u>Affordable housing will be incorporated into the overall design layout to avoid significant clustering of affordable housing. The design of affordable housing should make it indistinguishable from market housing.</u></p> <p><u>Legal agreements with the Council will ensure that affordable housing benefits, for both affordable rented and intermediate housing, are secured for first and subsequent occupiers and retained as affordable.</u></p>
MM25	Policy H9 Page 133	<p><del>Development of housing sites greater than 50 dwellings must include 5% of serviced plots for self-build, as evidenced by the Self-Build Register, unless such inclusion would render the development unviable.</del></p> <p><u>Housing sites of greater than 50 dwellings must include the provision of fully serviced plots for self or custom build housing within each phase to ensure as far as possible the continuous availability of such plots throughout the development.</u></p> <p><u>The number of such plots is to be negotiated on a phase by phase basis given the evidence of the Self-Build Register at the time. The arrangements to secure these plots as part of the planning permission and for their marketing to prospective purchasers are also to be agreed with the Council.</u></p> <p>Development of the serviced plots must commence within one year of the completion of the related phase of the allocated site. If the serviced plots have not commenced within this timeframe, they may revert to conventional development and marketing. Proof of adequate marketing of the plots to those on the self-build register will be required.</p> <p>All plots for self-build or custom-build housing must be fully serviced.</p> <p><u>Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy will new development be exempt from this requirement.</u></p> <p><u>The provision of such plots on sites of less than 50 dwellings will also be encouraged.</u></p>

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Mod No.	Policy No./Paragraph No.	Modification
	H9 Implementation Para 14.46 Page 133	<del>The Strategic policies indicate the sites that will contain an element of self-build or custom-build housing. In addition, other allocated sites will be expected to make a contribution to meet the demand.</del> <u>Policy H6 identifies that developers must provide self-build and/or custom build housing as part of the dwelling mix.</u> The Council encourages developers and land owners to consult the Council's <del>register</del> to establish the current demand for self-build and custom-housebuilding and meet that demand accordingly.
<b>CHAPTER 15</b>		
MM26	Policy PR7 Page 146	... (a) for units larger than 2,500 sq m, evidence has been provided to demonstrate that the unit has been actively marketed to the satisfaction of the Council for <u>an agreed period of up to at least two years to ensure such large units are protected wherever possible;</u> ...
<b>CHAPTER 16</b>		
MM27	Policy L1 Page 153	L1 Open Spaces, Play Areas, <u>Allotments</u> and Sporting Provision and Facilities in Major Development In major development <u>and depending on demonstrable need,</u> public open space, <del>and</del> play space, <del>and, where appropriate,</del> allotments and sporting <del>provision and</del> facilities are required, <del>together in all cases with</del> <u>to be provided (or upgraded in the case of existing facilities), along with</u> their <u>ongoing</u> management and maintenance.
MM28	Policy L3 Page 155	... In major developments, public art should be provided and maintained. <u>The form of public art in each case should be discussed with the Council at the earliest opportunity.</u> ...
	L3 Implementation New para before para 16.16 Page 155	<u>If providing public art in major development would not be achievable or viable, developers will be required to demonstrate this by submission of an independent viability appraisal or report.</u>

Mod No.	Policy No./Paragraph No.	Modification
MM29	<u>Policy L4 Health and Wellbeing (new Policy)</u> Page 156	<p><u>The Council will seek to deliver development and growth which has a positive impact on the health and wellbeing of residents, and address issues of health deprivation and health inequality in the district in accordance with the objectives of the Harlow Health and Wellbeing Strategy and in response to the various Evidence Base sources.</u></p> <p><u>When promoting development, applicants should consider the impact on the health and wellbeing of new and existing residents, having regard to the following principles:</u></p> <p><u>(a) infrastructure required to encourage physical exercise, including sport and recreation facilities, walking, and cycling and bridleway routes;</u></p> <p><u>(b) the provision of accessible open space, Green Infrastructure and landscaping;</u></p> <p><u>(c) the provision of new or enhanced healthcare facilities, working with the relevant health authorities;</u></p> <p><u>(d) the location and links between community facilities, homes, education and employment opportunities and sustainable travel options;</u></p> <p><u>(e) the provision of opportunities to grow food and avoiding unhealthy eating options; and</u></p> <p><u>(f) good quality design, having regard to the Essex Design Guide, which incorporates active design principles.</u></p> <p><u>Applicants may be required to prepare a Health Impact Assessment to determine the extent of potential health impacts from development proposals and set out appropriate mitigation measures.</u></p>
MM29 cont.	<u>L4 Justification</u> Page 156	<p><u>The Council wants all residents to live in environments that support good health and wellbeing and is committed to ensuring that residents benefit from the positive impacts that development and infrastructure growth can have on health and wellbeing. This is further supported through the outcomes of the Harlow Health and Wellbeing Strategy. Along with policies in the Local Plan as a whole, this policy ensures that development proposals have considered measures that will improve the health and wellbeing of residents and not contribute towards further worsening health issues across the district.</u></p> <p><u>The principles set out in this policy have been informed by the Town and Country Planning Association's Guide 8: Creating health promoting environments, which states that good living environments can have a positive impact on health equalities. This policy has also been developed having regard to health and wellbeing issues identified in Harlow, as evidenced by the Essex Joint Strategic Needs Assessment and Public Health Profiles produced by Public Health England.</u></p> <p><u>The Harlow and Gilston Garden Town partners are also developing a health framework using the NHS Healthy Towns Criteria, which will set out projects or interventions that could be enhanced in proposed developments and other opportunities for improving health and wellbeing across the Garden Town. Once complete it will be endorsed by the Garden Town local authorities and the Health and Wellbeing Boards.</u></p>

Mod No.	Policy No./Paragraph No.	Modification
	<p data-bbox="259 197 488 252"><u>L4 Implementation</u> Page 156</p> <p data-bbox="259 810 499 865"><b>(continues on next page)</b></p>	<p data-bbox="573 197 1928 252"><u>Implementation</u> <u>This policy refers to the Essex Design Guide which addresses health and wellbeing through the following sections:</u></p> <ul data-bbox="573 284 2085 497" style="list-style-type: none"> <li>• <u>Landscape and Greenspaces</u></li> <li>• <u>Layout Design</u></li> <li>• <u>Street and Roads</u></li> <li>• <u>Internal Design Details</u></li>   <li>• <u>Architectural Details</u></li> <li>• <u>Thematic sections dealing with: ageing populations: digital and smart technology: active design: health &amp; wellbeing itself</u></li> </ul> <p data-bbox="573 529 2119 711"><u>The Essex Design Guide, alongside the Harlow Design Guide and the Harlow and Gilston Garden Town Vision and Design Guide, should be used to help design good quality schemes that limit adverse impacts on and promote health and wellbeing in the first instance. These will help ensure that health and wellbeing are addressed at the earliest possible, conceptual / design stage of any development. This is necessary to help enable smoother and timelier progress through the development and planning application process. Accordingly, supporting master-planning work for larger developments will be required to ensure that these matters are addressed from the outset.</u></p> <p data-bbox="573 743 2119 896"><u>Where appropriate, this policy supports the use of Health Impact Assessments (HIA) for certain types of developments. HIAs allow the Council to assess the impact that the proposed development will have on the health and wellbeing of residents. These assessments ensure that the Council can work with developers to optimise the positive impacts on the health and wellbeing of potential development and reduce, remove or mitigate any identified unintended consequences that may arise on health from the submitted proposal.</u></p> <p data-bbox="573 896 2092 960"><u>Applicants should refer to the Essex wide HIA guidance, updated and agreed by the Essex local authorities, which assists in the preparation of HIAs.</u></p>
<p data-bbox="85 932 165 986"><b>MM29</b> <b>cont.</b></p>	<p data-bbox="259 932 488 1018"><u>L4 Implementation</u> Page 156 <b>cont.</b></p>	<p data-bbox="573 992 2105 1114"><u>This policy also refers to active design principles which have been produced by Sport England in partnership with Public Health England and is embedded in the Essex Design Guide. Active design is about designing and adapting where we live to encourage activity in everyday lives. It is a combination of ten principles that promote activity, health and stronger communities through built design and is an important consideration for new development proposals.</u></p> <p data-bbox="573 1145 2085 1235"><u>To support the Local Plan objective of improving the overall health and wellbeing of residents, the Harlow Health and Wellbeing Strategy and the Essex Joint Health and Wellbeing Strategy will be a material consideration in the determining of planning applications.</u></p>

Mod No.	Policy No./Paragraph No.	Modification										
<b>CHAPTER 17</b>												
MM30	Policy IN1 Page 159	<p>Sustainable Accessibility All development should have regard to the modal hierarchy as set out <del>in the Strategic Policies</del> <u>below</u>:</p> <table border="1" data-bbox="586 320 1267 683"> <tr> <td data-bbox="586 320 779 389"><u>TOP</u></td> <td data-bbox="779 320 1267 389"><u>Opportunities to reduce travel demand and the need to travel</u></td> </tr> <tr> <td data-bbox="586 389 779 485">⋮</td> <td data-bbox="779 389 1267 485"><u>Vulnerable road user needs such as pedestrians and cyclists</u></td> </tr> <tr> <td data-bbox="586 485 779 536">↓</td> <td data-bbox="779 485 1267 536"><u>Public transport passenger needs</u></td> </tr> <tr> <td data-bbox="586 536 779 632">↓</td> <td data-bbox="779 536 1267 632"><u>Powered two wheeler user needs such as mopeds and motorbikes</u></td> </tr> <tr> <td data-bbox="586 632 779 683"><u>BOTTOM</u></td> <td data-bbox="779 632 1267 683"><u>Other motor vehicle user needs</u></td> </tr> </table> <p><u>Major development proposals should identify ways to reduce the use of the car and promote alternative ways to travel and this should be detailed in a supporting Travel Plan.</u></p> <p>New developments including redevelopments, changes of use and Town Centre and transport interchange improvements will be required to link to <u>,or provide public transport services which link,</u> to the existing cycleway, footway, public right of way and bridleway network, and, where appropriate.....</p>	<u>TOP</u>	<u>Opportunities to reduce travel demand and the need to travel</u>	⋮	<u>Vulnerable road user needs such as pedestrians and cyclists</u>	↓	<u>Public transport passenger needs</u>	↓	<u>Powered two wheeler user needs such as mopeds and motorbikes</u>	<u>BOTTOM</u>	<u>Other motor vehicle user needs</u>
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<u>BOTTOM</u>	<u>Other motor vehicle user needs</u>											
MM31	Policy IN2 Page 161	<p>Development must meet the following criteria:</p> <p>it would not cause a <u>severe residual cumulative</u> <del>significant detrimental</del> impact on highway congestion and movement; .....</p>										
MM32	Policy IN4 Page 163	<p><b>1. Broadband Provision in Major Development</b> <del>Major development should contribute towards the provision of infrastructure suitable to enable the delivery of high-speed broadband services across the Harlow area.</del> <u>Developers will be expected to work with Broadband service providers to ensure that the provision of future proofed high speed Broadband infrastructure is available, including connections to buildings, and this should be by fibre connection wherever possible.....</u></p> <p>.....2. Broadband Infrastructure Development Broadband infrastructure development <del>must be accompanied by a report which</del> meets the following criteria:.....</p>										

Mod No.	Policy No./Paragraph No.	Modification
MM33	Policy IN6 Page 165	<p>Planning permission will only be granted for development if <del>the</del> provision is secured for related infrastructure, affordable housing, services, facilities and environmental protection <u>and any other planning contributions</u> which are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.</p> <p>The provision of such requirements shall be secured either as part of development proposals, through the use of conditions attached to planning permissions, or through planning obligations. Where it can be demonstrated that provision on-site is not feasible then provision elsewhere, or a <u>financial</u> contribution towards this provision, will be required.</p> <p>Where a planning application extends beyond the district boundary, prior agreement for the provision and location of any necessary obligations will need to be obtained from relevant parties.</p> <p><u>Where the submission of a viability assessment has been justified, the Council will require an independent review of the viability of the scheme to be prepared, the costs of which shall be met by the developer. Where it is accepted that planning contributions are reduced below the requirements set out in policies of the Local Plan, a viability review mechanism will be required to enable a fully policy compliant level of contributions to be achieved over the lifetime of the project. Other than in exceptional circumstances, viability assessments will be made publicly available.</u></p>
	IN6 Implementation Para 17.34 Page 165	<p>Planning obligations are negotiated on a case-by-case basis. <u>The approach to development viability, including how it should be taken into account in decision making, should be in accordance with national planning guidance. Viability review mechanisms will be considered on an individual basis taking into consideration matters such as the scale and phasing of the development and may be required both early and late in the development process. Further guidance will be available in an Adopted Planning Obligations Supplementary Planning Document (SPD).</u> <del>Where developers believe that viability is an issue, applicants will need to make a submission to the Council which should include the following:</del></p> <p><del>(a) — a financial viability appraisal;</del>  <del>(b) — a statement outlining the benefits and risks of not meeting the policy requirements and the site being delivered immediately.</del></p>

MM34 – Appendix 1

OLD TABLE:

SEDGEFIELD METHOD						
Calculating the required supply Dwellings						
a	Requirement to be delivered in plan period	9200				
b	Annual requirement over plan period [a/22]	418				
c	Five year requirement [b*5]	2091				
d	Under Supply since start of plan 2011-2017	1073				
e	Five year requirement plus under supply [c+d]	3164				
f	Annualised figure with under supply [e/5]	633				
g	Buffers 0% 5% 20% [e; e*0.05; e*0.2]	0				
h	Total 5 year requirement with buffers [g+e] (h/5) (annual)	3164	633	5% Buffer 3322	664	20% Buffer 3797 759
i	Proposed allocations (16/17 to 20/22)	506		506		506
j	Commitments (at 1st April 2017)	3416		3416		3416
k	Total Five Year Supply [j+i]	3922		3922		3922
l	Percentage Achievable [k/h*100]	124%		118%		103%
m	Years Supply [k/h (annual)]	6.2 years		5.9 years		5.2 years

NEW TABLE:

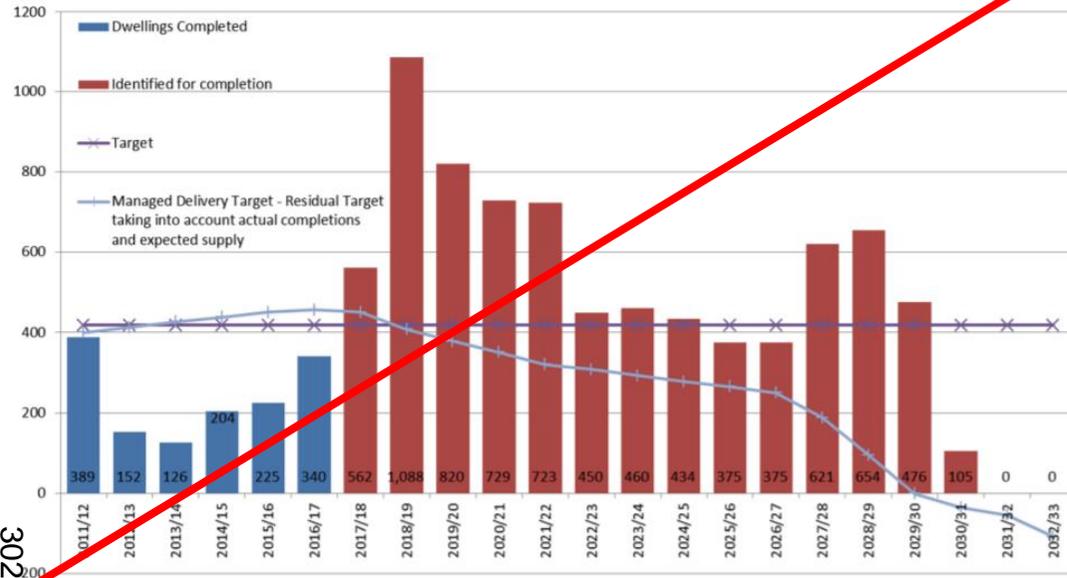
HOUSING LAND SUPPLY CALCULATION

As at 31 March 2019, using the Sedgfield method.

A. Requirement to be delivered in the plan period	9200
B. Requirement to be delivered by 31 March 2019 (361 x 8)	2888
C. Completions by 31 March 2019	2463
D. Under supply since start of plan	425
E. Further requirement to 31 March 2024 (361 x 5)	1805
F. Total requirement to 31 March 2024 (D + E)	2230
G. Requirement including 20% buffer	2676
H. Annualised requirement (G ÷ 5)	535
I. Supply from proposed allocations (19/20 to 23/24)	248
J. Commitments as at 31 March 2019	2981
K. Total supply as at 31 March 2019	3229
L. Years supply (K ÷ H)	6.0 years

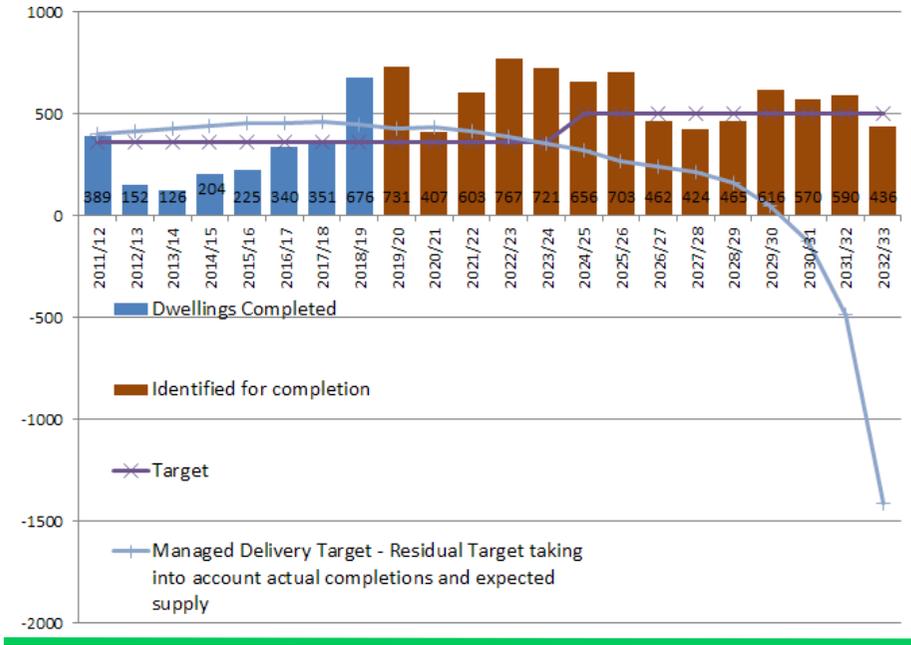
MM35 – Appendix 2

OLD GRAPH:



302

NEW GRAPH:



## SCHEDULE OF ADDITIONAL (MINOR) MODIFICATIONS – MARCH 2020

### HARLOW LOCAL DEVELOPMENT PLAN

This Schedule is ordered by chapter and contains the policy reference/paragraph number and page number for each modification.

Deleted text, maps or other figures are shown with a ~~red strike through~~; additions and replacements are underlined in green. Dots denote where the paragraph/policy continues before/after the text shown in the modification.

Due to insertions of new paragraphs, the paragraph numbers will subsequently change. These changes have not been indicated in this schedule. The policy and paragraph numbers referred to in this schedule are those found in the Pre-Submission Publication version of the Local Plan.

The **Pre-Submission Publication version of the Local Plan** and **Policies Map** are available on the Council website at [www.harlow.gov.uk](http://www.harlow.gov.uk) or by clicking [here](#) and [here](#), respectively.

Policy No./ Paragraph No.	Modification
Whole document	<p>...Garden Town <del>Spatial Vision</del> and <del>Design Charter Guide</del>...</p> <p>...national <u>planning</u> policies...</p> <p>...<u>Strategic</u> Master Plan... (where appropriate)            ...<del>activities</del> <u>uses</u>... (where appropriate)</p> <p><i>Typos and grammar corrections (some of these are shown in the rows below if they are also part of other changes)</i></p>
Background Pages i - iii	Removed outdated consultation info (dates, etc.)
<b>CHAPTER 1</b>	
Intro Para 1.1 Page 1	<p>The Harlow Local Development Plan (<u>usually</u> known as the “Local Plan” for brevity) sets out the long-term planning vision for the district and <del>aims to</del> <u>guides</u> future development across Harlow during the Local Plan period. <del>The Local Plan and</del> ensures that development in the district is sustainable and meets the needs of residents, businesses and visitors to the area. <del>Once it has been found sound and subsequently adopted, the</del> <del>new</del> Local Plan <del>will</del> <u>supersedes</u> the Adopted Replacement Harlow Local Plan (2006) <del>and will</del> <u>to</u> become the basis upon which planning applications are determined. <u>The policies and proposals in the Essex Minerals Local Plan and the Essex and Southend-on-Sea Waste Local Plan are the basis upon which Minerals and Waste proposals are determined by Essex County Council, unless there are material considerations which indicate otherwise.</u></p>
Intro New para after para 1.1 Page 1	<p><u>The Local Plan takes into consideration the economic, social and environmental conditions of the district. The preparation of the policies contained within it were informed by the Evidence Base which details the future housing, retail and employment needs of Harlow, together with identification of the necessary supporting infrastructure. All this is balanced against the need to protect key environmental assets. The strategic implications of the evidence were prepared and considered in collaboration with East Hertfordshire, Epping Forest and Uttlesford District Councils, and Essex and Hertfordshire County Councils, in accordance with the obligations of the Duty to Co-operate as set out in the Localism Act 2011. More information on the Duty to Co-operate can be found later in this chapter.</u></p>
Intro Para 1.2 Page 1	<p>..... <del>A</del> <u>The</u> Policies Map accompanies the Local Plan, <del>which and</del> illustrates the policy themes, areas where existing land uses will be protected and areas <del>for</del> <u>where</u> growth and regeneration <u>have been identified</u>. The Local Plan must be read as a whole and alongside national policies. <del>The Evidence Base, which contains studies such as the Retail Study and Employment Land Review, provides evidence to justify the policies in the Local Plan.</del></p>
Intro Para 1.3 Page 1	<p>..... the National Planning Policy Framework (NPPF) <u>(2012)<sup>2</sup></u> and Planning Practice Guidance <u>as it was in July 2018 when the new NPPF was published.</u></p>

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New footnote to accompany Para 1.3 Page 1	<u>Paragraph 214 of the NPPF (2019) states “The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019”. The policies of the 2012 NPPF, therefore, applied to the examination of the Harlow Local Plan, which was submitted in October 2018.</u>
Footnote Page 1	<del>Proposals relating to Minerals and Waste are determined by Essex County Council against the policies and proposals in their Minerals and Waste Local Plan, unless there are material considerations which indicate otherwise.</del>
Intro Para 1.6 Page 2	<del>Once adopted, the Local Plan will replace the Adopted Replacement Harlow Local Plan (2006). It <u>The Local Plan</u> will...</del>
Intro Para 1.7 Page 2	<p><del>In 2019/20, T</del>the Local Plan <del>will be</del> <u>was</u> examined by an independent Inspector to assess whether it <del>has been</del> <u>was</u> prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.</p> <p><del>According to national policies, a Local Plan is considered sound if it meets four tests:</del></p> <ul style="list-style-type: none"> <li><del>• 1. Is it positively prepared? It should be based upon a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</del></li> <li><del>• 2. Is it justified? It should be the most appropriate strategy, when considered against the reasonable alternatives, based upon proportionate evidence</del></li> <li><del>• 3. Is it effective? It should be deliverable over the Local Plan period and based upon effective joint working on cross-boundary strategic priorities</del></li> <li><del>• 4. Is it consistent with national policy? It should enable the delivery of sustainable development in accordance with national policies.</del></li> </ul>
Intro New paras after para 1.17 Page 4	<p><u>Pre-Submission Publication (2018)</u></p> <p><u>In 2018, the Council published the Pre-Submission Publication version of the emerging Harlow Local Development Plan, which was the final version before it was submitted for Examination.</u></p> <p><u>The Council invited comments on whether the Local Plan meets the following four tests of soundness, as set out by the National Planning Policy Framework (2012):</u></p> <ul style="list-style-type: none"> <li><u>• Positively prepared – the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</u></li> <li><u>• Justified – the Local Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</u></li> <li><u>• Effective – the Local Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</u></li> <li><u>• Consistent with national policy – the Local Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.</u></li> </ul> <p><u>The responses received informed a number of minor changes which were proposed by the Council and submitted – along with the Local Plan, Policies Map, Evidence Base and other accompanying documents – to the Secretary of State on 19 October 2018. The Examination subsequently took place in 2019/20.</u></p>

<p>Next Steps Para 1.18 Page 4</p>	<p><b>Next Steps</b> <del>Following the completion of these consultations, and in accordance with Government guidance, as set out in the NPPF and Planning Practice Guidance, the Council has prepared a Local Plan that has taken into consideration the economic, social and environmental conditions of the district. This has been informed by technical evidence that indicates the future housing, retail and employment needs, together with the identification of the necessary supporting infrastructure, balanced against the need to protect key environmental assets. The strategic implications of the evidence has been prepared and considered in collaboration with the adjoining District Councils of East Hertfordshire, Epping Forest and Uttlesford, in accordance with the obligations of the Duty to Co-operate as set out in the Localism Act 2011.</del></p>
<p>Policies Map info Para 1.21 Page 5</p>	<p>The Policies Map also indicated the boundaries and locations of <u>some of</u> Harlow's .....including Conservation Areas, <del>listed buildings</del>, Scheduled Monuments and <del>areas of archaeological value</del> <u>a Registered Park and Garden.</u></p>
<p>Policies Map info Para 1.23 Page 5</p>	<p>Housing <del>allocations</del> <u>sites</u>, including the Strategic Housing Site East of Harlow (<u>part of</u> a new Garden Community), are <del>shown</del> <u>allocated</u> on the Policies Map.....</p>
<p>Policies Map info Para 1.24 Page 5</p>	<p>Prosperity <u>Lifestyles and Infrastructure</u>  The Policies Map outlines the hierarchy of retail centres across the district including Neighbourhood Centres and <del>the</del> Hatches. <del>It should be noted that a</del> separate Area Action Plan is being prepared for Harlow Town Centre <del>that</del> <u>which</u> will be accompanied by a <del>detailed inset map, which will show</del> <u>Policies Map showing</u> major regeneration.....</p>
<p>306 Policies Map info Para 1.26 Page 6</p>	<p>Where appropriate <del>and where specific details are known at the time of publication</del>, the locations of the key infrastructure needed to support development <del>will be shown</del> <u>are identified</u> on the Policies Map.</p>
<p>SA info Para 1.28 Page 6</p>	<p>The Local Plan has been subject to a Sustainability Appraisal (SA) which has assessed the potential economic, environmental and social effects of the Local Plan. <del>This is also subject to consultation and can be found on the Council's website.</del> In addition a Habitats Regulation Assessment and Equalities Impact Assessment have been undertaken.</p>
<p>Duty to Co-operate Para 1.31 Page 6</p>	<p>...Conservation to ensure no adverse effects on <u>the</u> integrity of the SAC. <u>The MoU is required because development within Harlow may, in combination with development in other areas, affect the integrity of European Sites which lie outside the district. This MoU will ensure the co-operation needed to implement Policy WE3a.</u></p>

Assessing apps info Para 1.36 Page 7	Upon receipt of a valid planning application, the proposed development will be <u>assessed on determined using</u> the relevant <del>Strategic policies and Development Management policies in the</del> Local Plan <u>policies</u> . The <u>Essex Minerals Local Plan</u> and the <u>Essex and Southend-on-Sea Replacement Waste Local Plan</u> , <del>prepared</del> <u>adopted</u> by Essex County Council and Southend-on-Sea Borough Council, are the relevant Local Development Plans in respect of minerals and waste matters in <del>the district</del> <u>Harlow</u> . The Harlow Local Plan does not duplicate the Minerals <u>Local Plan</u> or Waste <u>Local Plan</u> . <del>The</del> <u>Furthermore, the</u> policies in <del>this document</del> <u>the Harlow Local Plan</u> do not repeat national guidance or policies. <del>Therefore,</del> where a <del>local</del> policy <u>in the Local Plan</u> is absent or silent, it is because adequate national <u>planning</u> policies exist.
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**CHAPTER 2**

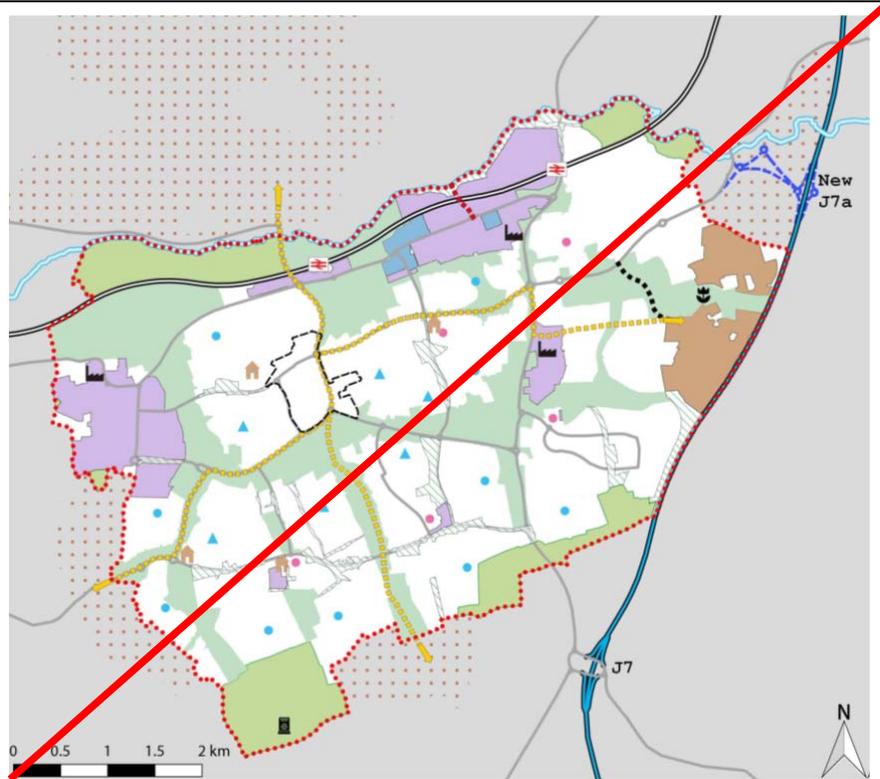
Population Profile Para 2.13 Page 13	<p>..... There are some variances between different parts of Harlow, with the east being less deprived than areas to the west and south. <u>Furthermore, the district's health profile is higher than the England averages in some respects, such as smoking rates, alcohol related hospital admissions and obesity. Physical activity is also low and therefore there are overall health and wellbeing issues across the town.</u></p>
Transport and Accessibility Para 2.33 Page 16	<p>..... There is also a need to increase the frequency of the bus services to the industrial estates; to provide more opportunities to travel <u>sustainably within and</u> in and out of Harlow <del>and not just within</del>; to increase the provision of Sunday services; and to improve journey times for buses <del>by decreasing congestion on Harlow's roads.</del></p>
Transport and Accessibility Para 2.34 Page 16	<p>..... There are also aspirations for a modal shift in travel, meaning 60% of <u>travel in the new Garden Town Communities and 50% in the existing area of Harlow</u> would be by sustainable modes of transport. Sustainable transport matters (including walking, cycling and public transport) <u>and reducing the need to travel</u> are, therefore, important for the successful future growth of Harlow.</p>
GI & natural environment Para 2.35 Page 16-17	<p>Green Infrastructure is multi-functional <u>natural and man-made</u> urban and rural green space, including parks, playing fields, woodlands, allotments, <del>and</del> wildlife corridors, <u>rivers, canals and other bodies of water</u> .....</p>
Historic Environment Para 2.38 Page 17	<p>..... The district also currently contains 168 listed buildings, 26 locally listed buildings, <u>a Registered Park and Garden</u> and several Scheduled Monuments.</p>
Issues and Challenges Para 2.44 Page 18	<p>..... Residential growth, <u>located,</u> managed and phased appropriately, will help to provide the investment needed to deliver infrastructure requirements including improvements to <u>the walking and cycling network and</u> public transport, the local and strategic road network and social infrastructure such as education and health, including the future requirements of the Princess Alexandra Hospital.</p>

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Issues and Challenges Para 2.45 Page 18	Significant <u>behavioural</u> change is required in the population of Harlow in order to deliver the enhancements needed to ensure Harlow is an <u>attractive</u> , sustainable <u>and healthy</u> town for residents, businesses and visitors.
<b>CHAPTER 3</b>	
Vision, 2 <sup>nd</sup> para Page 20	.....Harlow's residents will be more active, taking advantage of Harlow's excellent sporting, leisure and cultural facilities. <u>The overall health and wellbeing of Harlow's residents will be improved</u> , .....
Vision, final para Page 21	.....New development will minimise the use of global resources, support the development of good waste management, <u>and</u> mitigate and adapt to the effects of climate change, <u>and ensure a net gain in biodiversity is delivered</u> .....
Fig. 3.3 (Local Plan Strategic Objectives) Page 22	<p>.....11.<del>To p</del> Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district</p> <p><u>12. Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>.....</p> <p>.....<del>14</del><u>3</u>. Reduce the need to travel by vehicle, <u>by ensuring and ensure</u> new development is sustainably located <u>and/or</u> accessible by sustainable <u>and innovative</u> modes of transport.....</p> <p>.....<del>14</del><u>15</u>. Improve transport links, particularly for sustainable modes of transport, to <del>community</del> <u>access all facilities and jobs</u>. .....</p>
<b>CHAPTER 4</b>	
Placeshaping info Para 4.5 Page 28	New development will incorporate sufficient open space and Green Infrastructure, protect and integrate existing landscape assets, and enhance, retain and protect biodiverse habitats <u>to ensure a net gain in biodiversity is delivered</u> .....
Placeshaping info Para 4.7 Page 28	New development must also have regard to <u>The Town and Country Planning Association's Garden City Principles</u> , the <del>Council's</del> <u>Harlow</u> Design Guide and the Harlow and Gilston Garden Town <del>Spatial</del> Vision and Design <del>Charter</del> <u>Guide</u> ..... .....The historic environment, including listed buildings, <del>C</del> onservation <del>A</del> reas, Scheduled Monuments <u>and</u> Registered Parks <u>and</u> Gardens <del>and</del> <u>areas of architectural significance</u> , will be conserved, protected and <del>managed</del> <u>enhanced</u> .

Prosperity info Para 4.15 Page 30	It has been identified that approximately 18 to 20ha of additional employment <del>floorspace</del> <u>land</u> is required.....
Lifestyles info Para 4.20 Page 31	.....This includes leisure and sporting facilities, playing pitches, playgrounds, allotments, <del>and</del> community halls <u>and places of worship</u> which will help reduce deprivation levels and promote healthy and active lifestyles.
Lifestyles info New paras after para 4.23 Page 31	<p><u>The policies in the Local Plan, as a whole, aim to improve the overall health and wellbeing of residents by ensuring that there is access to jobs and education opportunities; improving infrastructure for more sustainable, active and healthy transport choices; protecting and enhancing the natural and historic environment for the benefits of residents; providing leisure, recreation, sporting and retail facilities; and creating well-designed developments.</u></p> <p><u>The Local Plan will ensure there is sufficient health infrastructure in place to support new development. To support these objectives, the Harlow Health and Wellbeing Strategy and the Essex Joint Health and Wellbeing Strategy will be a material consideration in the determination of planning applications.</u></p>
Infrastructure info Para 4.25 Page 31	.....Improvements will be made to the local highway network, <del>and to</del> the <u>footway and cycleway networks and</u> public transport to improve connections within Harlow and to areas outside the district.....

Fig. 4.1 (Key Diagram)  
Page 33



OLD DIAGRAM

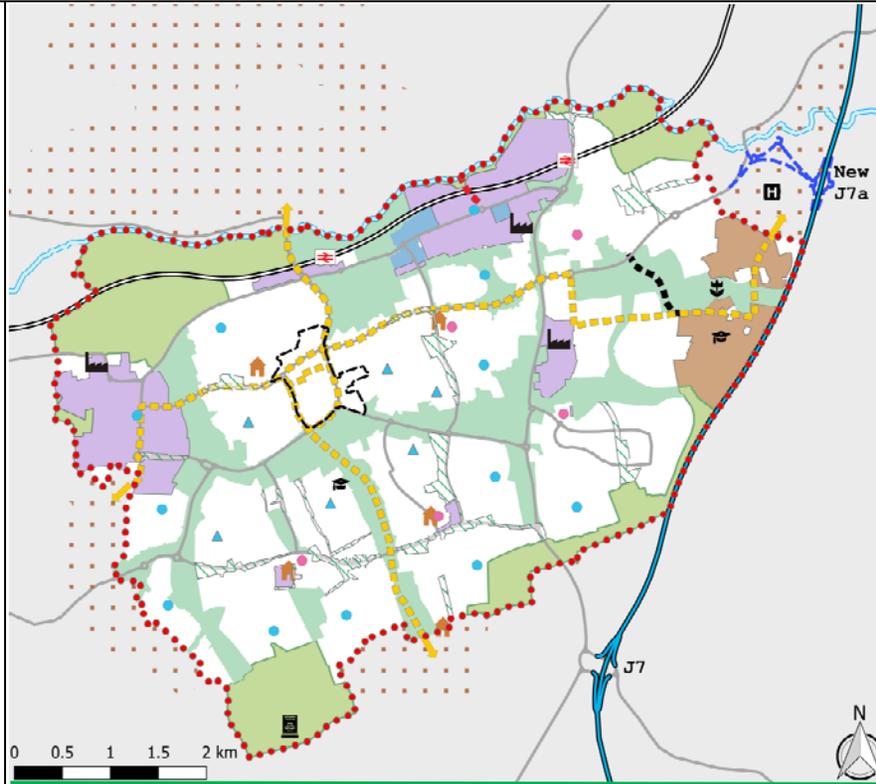
**Legend**

- |  |   |   |
|--|---|---|
| <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #c8e6c9; border: 1px solid #000; margin-right: 5px;"></span> Green Wedge</li> <li><span style="display: inline-block; width: 15px; height: 10px; background: repeating-linear-gradient(45deg, transparent, transparent 2px, #ccc 2px, #ccc 4px); border: 1px solid #000; margin-right: 5px;"></span> Green Finger</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #e2efda; border: 1px solid #000; margin-right: 5px;"></span> Green Belt</li> <li><span style="display: inline-block; border: 1px dashed black; width: 15px; height: 10px; margin-right: 5px;"></span> Area covered by Town Centre Area Action Plan</li> <li><span style="display: inline-block; width: 8px; height: 8px; background-color: #e91e63; border-radius: 50%; margin-right: 5px;"></span> Neighbourhood Centre</li> <li><span style="display: inline-block; width: 8px; height: 8px; background-color: #00bcd4; border-radius: 50%; margin-right: 5px;"></span> Hatch</li> <li><span style="display: inline-block; width: 8px; height: 8px; background-color: #00bcd4; border-radius: 50%; margin-right: 5px; opacity: 0.5;"></span> Hatch identified for mixed use regeneration</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #bbdefb; border: 1px solid #000; margin-right: 5px;"></span> Retail Warehouse Area</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #e1bee7; border: 1px solid #000; margin-right: 5px;"></span> Employment land</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #e1bee7; border: 1px solid #000; margin-right: 5px; opacity: 0.5;"></span> New employment land</li> </ul> | <ul style="list-style-type: none"> <li><span style="display: inline-block; border-top: 1px dashed red; width: 20px; margin-right: 5px;"></span> Indicative new Stort Crossing</li> <li><span style="display: inline-block; border-top: 2px dashed orange; width: 20px; margin-right: 5px;"></span> Indicative new Sustainable Transport Corridor linking to the Garden Communities</li> <li><span style="display: inline-block; border-top: 1px dashed black; width: 20px; margin-right: 5px;"></span> Indicative new access for East of Harlow Strategic Housing Site</li> <li><span style="display: inline-block; border-top: 2px dashed blue; width: 20px; margin-right: 5px;"></span> New route from Junction 7a to Harlow</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: #ccc; border: 1px solid #000; margin-right: 5px;"></span> New allotment</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: #ccc; border: 1px solid #000; margin-right: 5px; opacity: 0.5;"></span> Cemetery expansion</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #e1bee7; border: 1px solid #000; margin-right: 5px;"></span> Allocated housing site (<del>only sites above 40 dwellings shown on Key Diagram</del>)</li> </ul> <p>New Garden Communities:</p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #e1bee7; border: 1px solid #000; margin-right: 5px;"></span> Strategic Housing Site East of Harlow</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px dotted #ccc; margin-right: 5px;"></span> Sites outside Harlow</li> </ul> | <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #ccc; border: 1px solid #000; margin-right: 5px; opacity: 0.5;"></span> Railway station</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #00bcd4; border: 1px solid #000; margin-right: 5px;"></span> M11</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid #ccc; margin-right: 5px;"></span> Major road</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid #ccc; margin-right: 5px; opacity: 0.5;"></span> Railway</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid #00bcd4; margin-right: 5px;"></span> River Stort</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 2px dotted red; margin-right: 5px;"></span> District boundary</li> </ul> |
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Fig. 4.1 (Key Diagram)  
Page 33



**NEW DIAGRAM**

**Legend**

- |   |   |                                       |
|---|---|---------------------------------------|
| Green Wedge   | Indicative new Stort Crossing   | Railway station                       |
| Green Finger  | Indicative new Sustainable Transport Corridor linking to the Garden Communities | M11                                   |
| Green Belt  | Indicative new access for East of Harlow Strategic Housing Site                 | Major road                            |
| Area covered by Town Centre Area Action Plan          | New route from Junction 7a to Harlow  | Railway                               |
| Neighbourhood Centre                                  | <u>New education facility</u>   | River Stort                           |
| Hatch   | Cemetery expansion  | District boundary                     |
| Hatch identified for mixed use regeneration           | <u>Indicative location of new allotments</u>                                    | <b>New Garden Communities:</b>        |
| Retail Warehouse Area                                 | <u>Indicative location of new hospital</u>                                      | Strategic Housing Site East of Harlow |
| Employment land                                       |   | Sites outside Harlow                  |
| New employment land                                   |   |                                       |
| <u>Allocated housing site of 30 or more dwellings</u> |   |                                       |

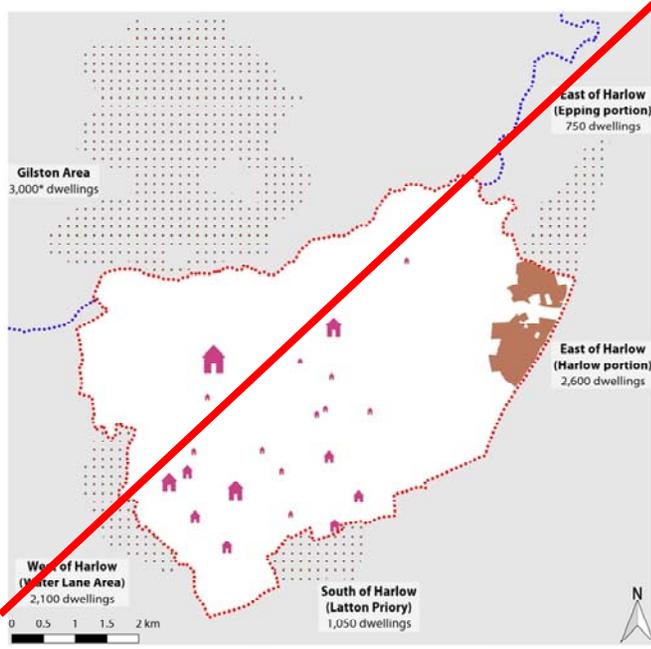
*This diagram is for diagrammatical purposes only and is not a definitive map of policies or designations. Due to the map scale, locations may not be exact and some features appear to overlap where they may not in reality. The Policies Map should be consulted for accurate boundaries and locations of features and designations.*

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## CHAPTER 5

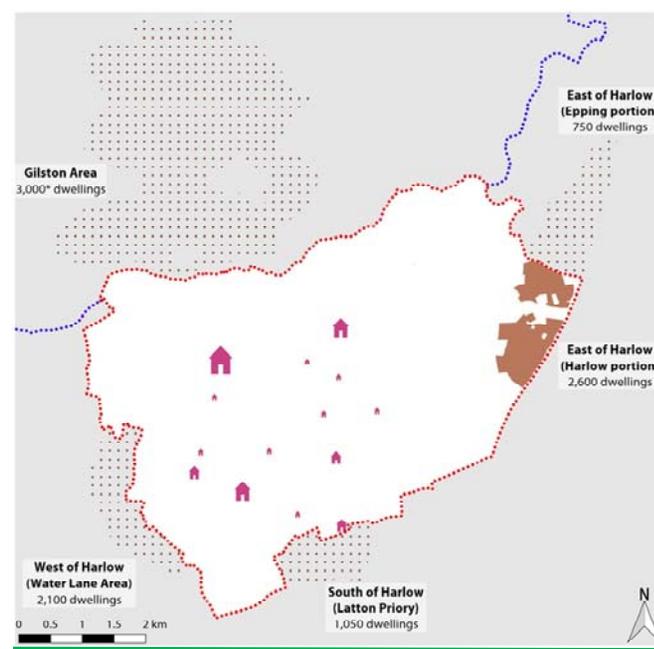
Chapter 5 heading	5. <u>DEVELOPMENT AND DELIVERY OF GARDEN COMMUNITIES IN THE</u> HARLOW AND GILSTON GARDEN TOWN
Chapter intro New para after para 5.1 Page 36	<u>Harlow and Gilston Garden Town comprises the whole of Harlow, together with four new Garden Town Communities planned on Garden City principles, as follows:</u> <ul style="list-style-type: none"> <li>• <u>South of Harlow (Latton Priory);</u></li> <li>• <u>West of Harlow (Water Lane Area);</u></li> <li>• <u>East of Harlow; and</u></li> <li>• <u>Gilston Area (including seven villages).</u></li> </ul>
Local Plan Strategic Objectives Para 5.7 Page 37	<ul style="list-style-type: none"> <li>➤ .....Objective 11 - <del>To p</del> Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district</li> <li>➤ <u>Objective 12 - Provide opportunities to improve the overall health and well-being of Harlow's residents</u></li> <li>➤ Objective <u>13-2</u> - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities</li> <li>➤ Objective <u>14-3</u> - Reduce the need to travel by vehicle <del>by ensuring</del> and <u>ensure</u> new development is sustainably located <u>and/or</u> accessible by sustainable <u>and innovative</u> modes of transport</li> <li>➤ Objective <u>15-4</u> - Improve transport links, particularly for sustainable modes of transport, to <del>community</del> <u>access all</u> facilities <u>and jobs</u></li> </ul>
HGT1 Implementation Para 5.16 Page 41	.....Aspirations include a modal travel shift, <del>meaning towards</del> <u>60% by sustainable modes of transport of travel in the new Garden Communities, and 50% in the existing area of Harlow would be by sustainable modes of transport.</u>
HGT1 Implementation Para 5.21 Page 41	..... <del>The Councils will seek to adopt the Strategic Master Plans as Supplementary Planning Documents (SPDs).</del>
HGT1 Implementation Para 5.24 Page 42	.....The developments <del>also provide opportunities to</del> <u>should</u> promote high environmental standards in terms of energy efficiency, <u>construction quality</u> , design and low-carbon technologies, and set <del>an example</del> <u>a high performance benchmark</u> for future major development.

OLD DIAGRAM



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NEW DIAGRAM



This diagram is for diagrammatical purposes only and is not a definitive map of policies or designations. Due to the map scale, locations may not be exact and some features appear to overlap where they may not in reality. The Policies Map should be consulted for accurate boundaries and locations of features and designations.

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Legend

- Land for new Garden Community allocated in Harlow Local Plan\*\*
- Land for new Garden Community allocated in other Local Plans\*\*
- Harlow district boundary
- Epping Forest / East Hertfordshire district boundaries
- Land in adjoining districts

Housing sites allocated in Harlow\*\*

- 10 - 19 dwellings
- 20 - 39 dwellings
- 40 - 70 dwellings
- > 70 dwellings

Note: All dwelling figures are approximate.

\*3,000 dwellings to be delivered in the Gilston Area during the Local Plan Period, with a further 7,000 thereafter.

\*\*New Garden Communities, and housing sites allocated in Harlow, to be delivered in accordance with the Harlow and Gilston Garden Town Design [Charter](#). [Guide](#)

HGT1 Implementation Para 5.38 Page 45	...including the potential relocation of the Princess Alexandra Hospital <u>(PAH)</u> , to serve the wider area...
HGT1 Implementation Para 5.39 Page 45	<del>Two potential sites for relocation of Princess Alexandra Hospital are currently being considered through a Strategic Outline Business Case: one in the Gilston area to the north of Harlow, and one at land to the east of Harlow within the Epping Forest District.</del> <u>In March 2019, the PAH Board approved the recommended preferred way forward for the provision of a new hospital. This option comprises the development of a new state of the art local acute hospital. The hospital is to be located on approximately 12ha of greenfield land within the Epping Forest portion of the East of Harlow Garden Community.</u>
<b>CHAPTER 6</b>	
Local Plan Strategic Objectives Para 6.4 Page 48	.....Objective <del>13</del> <u>14</u> - Reduce the need to travel by vehicle <del>by ensuring new</del> <u>and ensure new</u> development is sustainably located <u>and/or</u> accessible by sustainable <u>and innovative</u> modes of transport
Policy SD1 Page 49	.....Where there are no policies specifically relevant to the proposed development <u>or the relevant policies are out-of-date</u> , it will normally be supported, unless material considerations indicate otherwise and/or either of the following apply:.....
<b>CHAPTER 7</b>	
Chapter 7 Intro Para 7.3 Page 52	...However, in order to contribute to meeting the district's affordable housing need, <u>provide a</u> <del>and to provide the</del> critical mass for regeneration and urban renewal, <u>and to help meet the wider needs of the Housing Market Area</u> , additional housing above the OAHN has been proposed.
Local Plan Strategic Objectives Para 7.5 Page 52	..... <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>
HS1 Implementation Para 7.24 Page 55	..... In addition, a buffer of 5% <del>or 20%</del> should be added to the five-year requirement, <u>or 20%</u> if there has been a <del>persistent</del> <u>significant</u> undersupply of dwellings in the past. Based on the <del>9,200 dwelling requirement annualised to 418 dwellings per annum</del> <u>361 dwellings per annum requirement. 2,888 dwellings</u> <del>2509 dwellings</del> should have been completed by March 2017 <del>9</del> . <del>In reality</del> <u>However</u> , there were <del>1,436</del> <u>2,463</u> completions <del>(239 dwellings per annum)</del> achieved during this period, resulting in a shortfall of <del>1,073</del> <u>425</u> dwellings on the requirement. <del>This shortfall indicates a 20% buffer, of 633 dwellings, should be provided. Therefore, additional housing sites that can be completed in the five years need to be brought forward in order to meet the five year housing requirement calculation (see Appendices).</del> <u>The 2018 Housing Delivery Test showed that Harlow delivered 84% of the necessary dwellings, triggering a 20% buffer. In future, a Delivery Test figure of 85% or more will only trigger a 5% buffer. See Appendix 1 for the current calculation.</u>
HS1 Implementation Para 7.26 Page 56	There have been <del>1,436</del> <u>2,463</u> dwelling completions since the start of the Local Plan period (1 April 2011). There is planning permission for <del>4,122</del> <u>4,723</u> dwellings (as at 31 March 2017 <del>9</del> ) which contributes to the housing supply. The Local Plan is, therefore, required to allocate at least <del>3,700</del> <u>2,014</u> dwellings. The housing trajectory (see Appendices <u>1 and 2</u> ) illustrates the expected rate of housing delivery for the Local Plan period.

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HS2 Justification Para 7.31 Page 57	.....There have been <del>1,436</del> <u>2,463</u> dwellings completed during the period of 1 April 2011 to 31 March 2017 <sup>9</sup> and an additional <del>4,122</del> <u>4,723</u> dwellings have planning permission. This leaves a residual requirement of <del>3,642</del> <u>2,014</u> dwellings to be provided.
HS2 Justification Para 7.32 Page 58	.... allocated in Policy HS2 for <del>1,447</del> <u>834</u> dwellings provide a total of <del>3,747</del> <u>3,434</u> dwellings. This is <del>405</del> <u>1,420</u> dwellings more than the residual requirement of <del>3,642</del> <u>2,014</u> .....
HS3 Justification Para 7.35 Page 59	The Strategic Housing Site East of Harlow was identified as part of a joint study ( <u>the Harlow Strategic Site Assessment, 2016</u> ) with the Housing Market Area (HMA) districts.....
HS3 Implementation Para 7.43 Page 60	Developers will be required to produce a master plan <del>based on</del> <u>in general conformity with</u> the <u>Harlow and Gilston</u> Garden Town <del>Charter</del> <u>Design Guide and</u> in partnership with....
<b>CHAPTER 8</b>	
Local Plan Strategic Objectives Para 8.4 Page 64	<u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>
315 Policy ED1 Page 65	Future Employment <del>Floorspace</del> <u>Land</u>  .... up to 18.8ha of B1 uses <del>will be delivered</del> <u>are allocated</u> at Harlow Business Park....  ....A further 2.2ha of land <del>will be delivered</del> <u>is allocated</u> for employment uses at Templefields....  ....TOTAL EMPLOYMENT PROVISION <del>20</del> <u>21</u> ha .....
ED1 Justification Para 8.10 Page 66	..... This concluded that 10 to 24ha of office <del>floorspace</del> (B1) and 68ha of industrial <del>floorspace</del> (B2/B8) <u>land</u> should be planned for during the period of 2016 to 2033.
ED1 Justification Para 8.11 Page 66	For Harlow, the <del>document</del> <u>evidence</u> identified the need to plan for a further 2 to 4ha of office <del>floorspace</del> (B1) and 16ha of industrial <del>floorspace</del> (B2/B8) <u>land</u> between.....
<b>CHAPTER 9</b>	
Local Plan Strategic Objectives Para 9.4 Page 72	<u>....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>

RS3 Justification  
Para 9.19  
Page 76

.....~~The Strategic policies list strategic housing allocations~~ Policy HS2 allocates sites for housing, including Hatches identified for mixed used redevelopment. These Hatches are also listed in Fig. 9.1 and identified on the Policies Map.

REF.	LOCATION	DWELLINGS CAPACITY
40 6	Pollard Hatch plus garages and adjacent land	20
42 7	Coppice Hatch and garages	16
44 9	Elm Hatch and public house	13
46 10	Fishers Hatch	10
47 11	Slacksbury Hatch and associated garages	10
24 14	Pypers Hatch	10

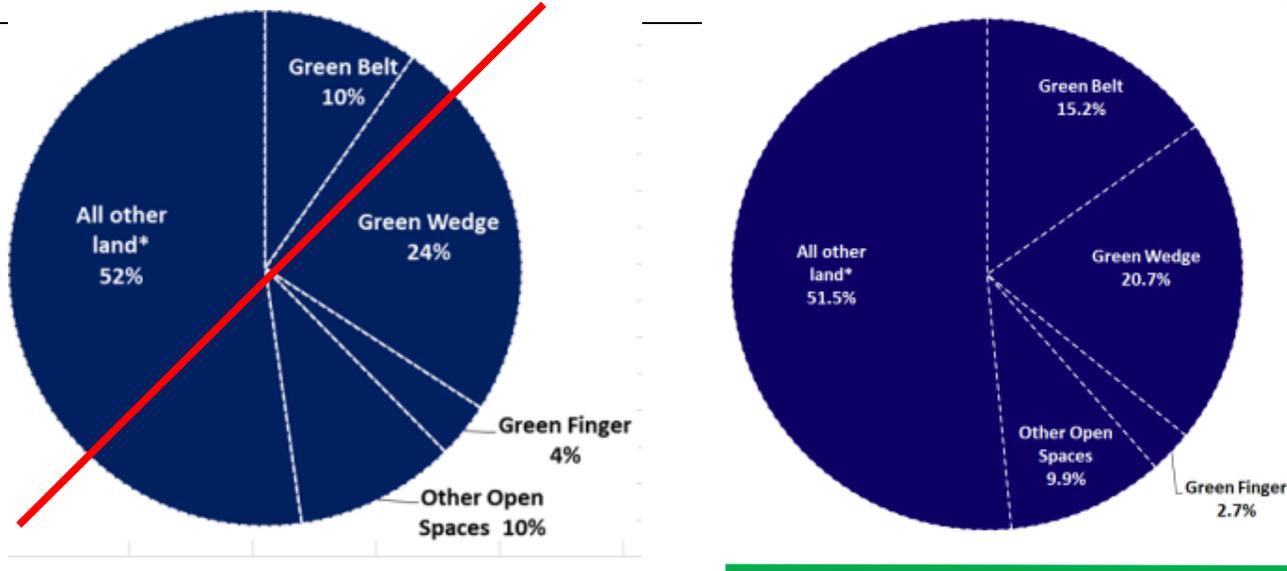
*Added footnote to table*  
\*Dwelling numbers are indicative and sites will be subject to detailed planning to establish their final capacity.

**CHAPTER 10**

Local Development  
Plan Strategic  
Objectives  
Para 10.4  
Page 80

....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents

WE1 Implementation  
Fig. 10.1  
Page 82

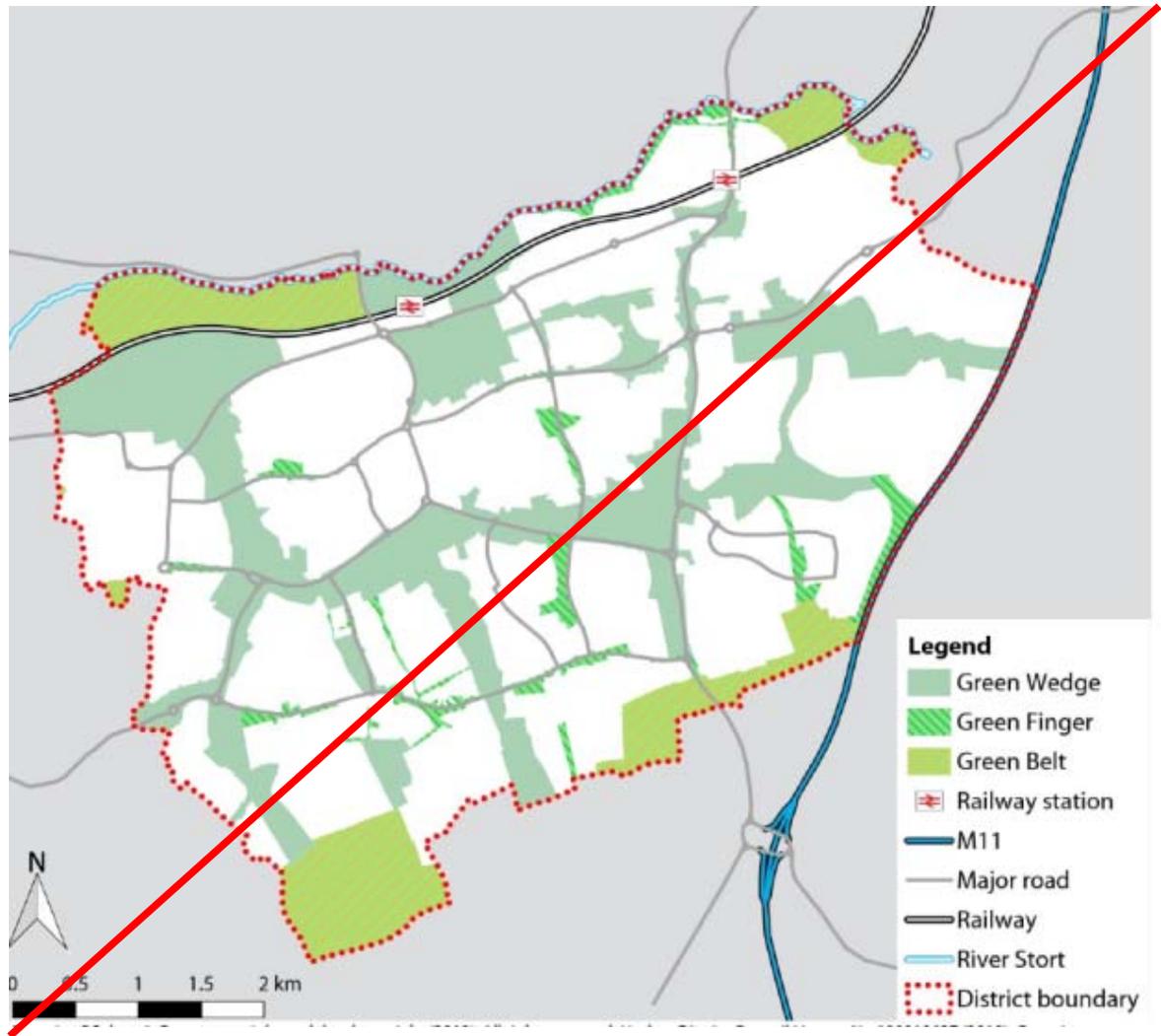


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WE1 Implementation Para 10.8 Page 81	<p>Harlow's tight administrative boundary and the lack of unconstrained land in the district means the Objectively Assessed Housing Need (OAHN) could not be met without assessing all options. Green Belt and Green Wedge Reviews were therefore undertaken to inform a decision as to whether exceptional circumstances existed such that land could be removed from those designations for housing. These reviews identified <u>limited</u> areas of the Green Belt and Green Wedges that did not fulfil their respective <del>purposes</del> <u>criteria</u>. Where appropriate, these areas have been <u>released from their designation and, where appropriate,</u> re-designated as either Green Wedge or Green Finger.</p> <p><del>In all the circumstances, including the level of housing need, i</del> <u>Given the level of housing need,</u> it was decided that exceptional circumstances for Green Belt release <del>were present</del> <u>existed to the east of Harlow,</u> and <u>this</u> land was <u>therefore</u> released in order to meet the OAHN, <del>including one area of Green Belt to the east of Harlow, which also did not fulfil the purposes of the Green Belt. That</del> <u>This</u> land <del>has been</del> <u>is</u> allocated as the district's Strategic Housing Site. The existing Green Wedge <del>has been</del> <u>will be</u> extended to run eastwards through the site. <del>Four sites that were once part of the Green Wedges have been allocated as housing sites.</del></p> <p><u>A new Green Finger has been designated along the western boundary of the Gilden Park housing site, extending eastwards to include the linear park through the housing site, and extending westwards to include the informal open space to the east of Old Road.</u></p>
WE1 Implementation Para 10.11 Page 82	<p>.....Green Infrastructure also includes <u>water rivers, canals and other</u> bodies <del>found in green spaces</del> <u>of water, as well as</u> <del>and non-</del> <u>accessible</u> green spaces which provide visual amenity.....</p>
WE1 Implementation Para 10.12 Page 82	<p><u>At a strategic scale,</u> <del>the</del> Green Infrastructure network in Harlow includes the Green Belt, Green Wedges, Green Fingers <del>and</del> <u>Other Open Spaces and the River Stort</u>. At a smaller scale, it <del>also</del> includes trees, hedgerows, <u>ponds, streams</u> and landscaping in developments, such as green roofs or green walls.....</p>
WE1 Implementation Para 10.15 Page 83	<p>....corridors across the district. <u>The actions and measures contained in the Water Framework Directive will be used to provide opportunities for the Stort Riverpark.</u></p>

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Green Wedges and Green Fingers in Harlow



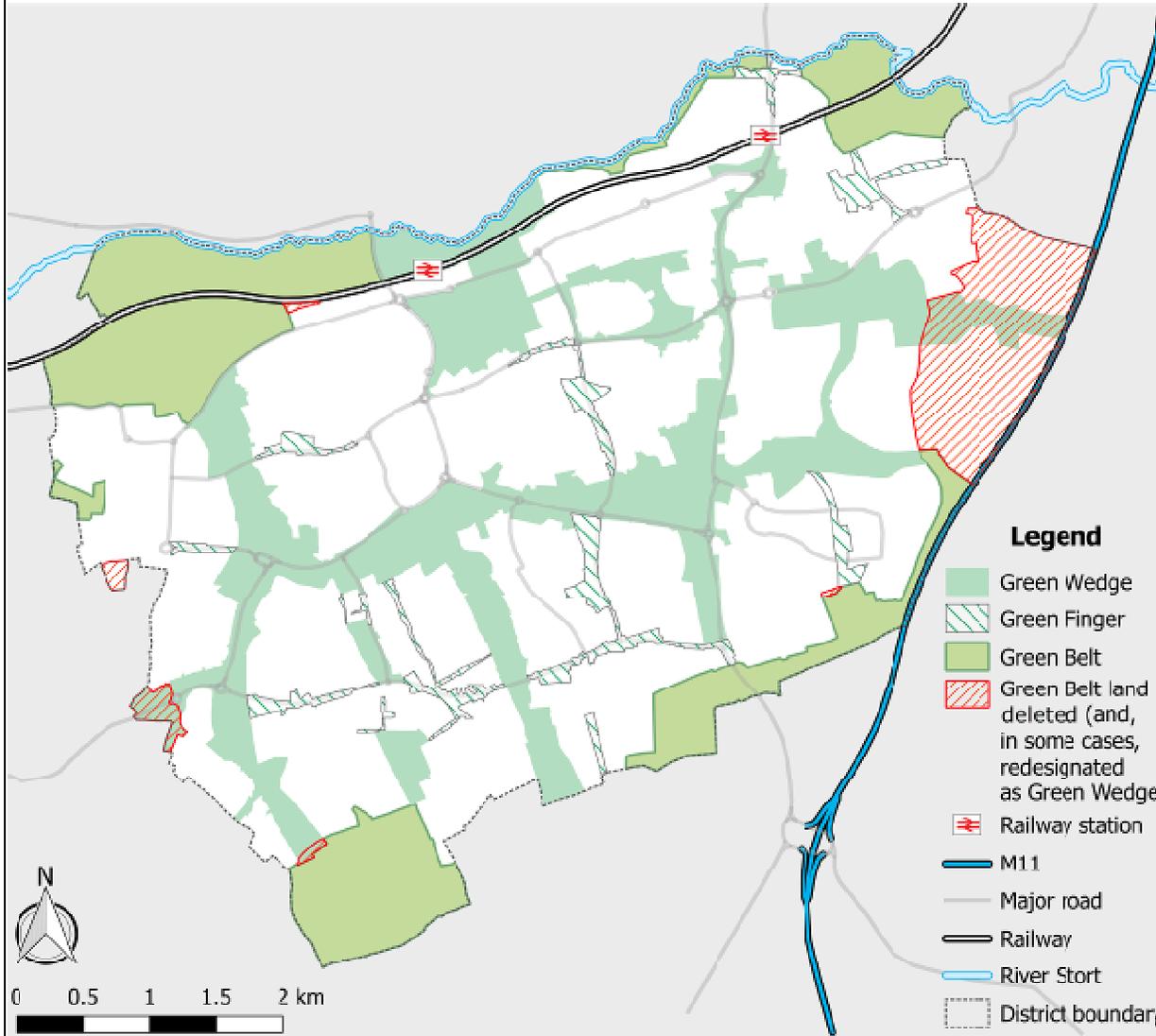
OLD DIAGRAM

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Green Belt, Green Wedges and Green Fingers in Harlow

**NEW DIAGRAM**



This diagram is for diagrammatical purposes only and is not a definitive map of policies or designations. Due to the map scale, locations may not be exact and some features appear to overlap where they may not in reality. The Policies Map should be consulted for accurate boundaries and locations of features and designations.

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WE3 Implementation Para 10.26 Page 86	<del>The</del> <u>All</u> biodiversity and geodiversity assets <u>in Harlow</u> are protected from inappropriate development.
Policy WE4  Page 87	Heritage assets and their settings found within the district will be <del>preserved</del> <u>conserved</u> or enhanced.....  .....(d) <del>Historic</del> <u>Registered</u> Parks and Gardens.....
<b>CHAPTER 11</b>	
Local Plan Strategic Objectives Para 11.5 Page 90	....Objective 11 - <del>To p</del> <u>Provide</u> and enhance sporting, leisure, recreational facilities and cultural opportunities in the district  <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>  Objective <del>13</del> <u>14</u> - Reduce the need to travel by vehicle <del>by ensuring</del> <u>and ensure</u> new development is sustainably located <u>and</u> /or accessible by sustainable <u>and innovative</u> modes of transport  Objective <del>14</del> <u>15</u> - Improve transport links, particularly sustainable modes of transport, to <del>community facilities</del> <u>access all facilities and jobs</u> .
SIR1 Justification Para 11.12 Page 93	..... education providers including independent schools and academy trusts. <u>Land given over for schools must meet the criteria set out in Essex County Council's Developer's Guide to Infrastructure Contributions.</u>
SIR1 Justification Para 11.13 Page 93	In Harlow there is an overall need to provide <del>11.1</del> <u>FE of additional</u> secondary school places ( <del>gross</del> ). A new secondary school will be provided <del>in the Epping Forest District,</del> in the new Garden <u>Town</u> Community to the east of Harlow, and a new 8FE secondary school is being opened in Harlow <u>(the new 'Sir Fredrick Gibberd Academy')</u> . <u>While this contributes some capacity to meet housing growth, this is being established to serve existing population (cohort) growth.</u> There is also additional capacity in some of the existing secondary schools in Harlow. <u>The provision of new schools in the new Garden Town Community to the east of Harlow will have a land use implication; however their location is still to be determined by an agreed Strategic Master Plan.</u>
SIR1 Justification Para 11.14 Page 93	There is an overall need to provide <del>11.9</del> <u>FE of additional</u> primary school places ( <del>gross</del> ) in Harlow <u>as set out in the Infrastructure Delivery Plan (IDP)</u> , of which some.....
SIR1 Justification Para 11.17 Page 93	The Council and Harlow Health Centres Trust are working together to expand health facilities for existing population growth and will work with the Clinical Commissioning Groups <u>(West and East Essex and North Hertfordshire)</u> and NHS <u>England</u> to deliver new health facilities as part of planned growth. New healthcare facilities will be delivered <u>where necessary</u> , as part of new settlements ideally located in accessible locations, situated in a local centre with a range of other community facilities. <u>Increasing capacity within current infrastructure will also be explored.</u>
SIR1 Justification Para 11.26 Page 94	.....The Development Management policies <del>ensure</del> <u>encourage that</u> broadband coverage <u>to be extended</u> <del>ed</del> into new developments and that telecommunications equipment is provided in Harlow.

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SIR1 Implementation Para 11.33 Page 95	.....Specific infrastructure items that are required to deliver growth locations and development sites will mostly be funded by Section 106 Agreements between the Council, <u>County Council</u> and the developer.....
<b>CHAPTER 13</b>	
Local Plan Strategic Objectives Para 13.5 Page 102	<u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>
PL1 Implementation Para 13.9 Page 103	.....This will be used to guide and assess future development across Harlow and will be a material consideration in the determination of planning applications. <u>Applicants should also refer to the services and access chapter of the Essex Design Guide, which provides detailed highways design guidance.</u>
New footnote relating to para 13.16 Page 105	<u>UK Green Building Council. 2018. Driving sustainability in new homes: a resource for local authorities.</u>
PL3 Implementation Para 13.18 Page 106	.....to reducing carbon dioxide (CO2) emissions. <del>The energy hierarchy set out in the Strategic policies should be considered within the Sustainability Statement.</del> The Sustainability Statement should <b>also</b> make clear how measures.....
PL4 Implementation Para 13.22 Page 107	.....Details of their roles and functions are set out in <del>the Strategic policies</del> <u>Policy WE2.</u>
PL4 Implementation Para 13.23 Page 107	Small-scale development can include householder applications, school or sports related development, recreation and community uses. <u>waterway uses and facilities/services related to an existing use.</u>
PL7 Implementation Para 13.42 Page 111	Green Infrastructure is multi-functional natural and man-made <u>urban and rural</u> green space, including parks, playing fields, woodlands, allotments and wildlife corridors. <u>rivers, canals and other bodies of water.</u> At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs, <del>and</del> green walls, <u>rain gardens and ponds.</u>

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PL7 Implementation Para 13.44 Page 112	The Council may require a Management Plan to be submitted, which demonstrates how the future maintenance of the Green Infrastructure and landscaping would be managed, in order to protect its quality and functionality in the long-term. <u>including, where appropriate, the protection and recovery of priority habitats and species.</u>
PL8 Justification Para 13.45 Page 112	As a planned New Town, Harlow benefits from networks of open spaces which contribute to the biodiversity of the district, conserve habitats of local significance and <del>enable the appreciation of wildlife</del> <u>provide opportunities for people to enjoy nature.</u>
PL8 Justification Para 13.46 Page 112	Helping to protect and enhance biodiversity is one of the fundamental aims of national <u>planning</u> policies and guidance, <del>halt the overall decline in biodiversity</del> to <u>achieve a net gain in biodiversity</u> .....
PL8 Implementation Para 13.47 Page 112	..... In Harlow, the highest order asset type is Sites of Special Scientific Interest, followed by locally designated sites ( <u>Local Wildlife Sites and Local Nature Reserves</u> ), ancient woodland, and aged or veteran trees found outside ancient woodland.....
PL8 Implementation New para after para 13.48 Page 112	<u>If the richness of biodiversity evident at a non-designated asset increases sufficiently, it may become formally declared as a designated asset, such as a Local Wildlife Site or Local Nature Reserve. Information of any such declarations would be made available on the Council's website.</u>
PL8 Implementation Para 13.49 Page 113	The Council may require assessments of biodiversity and geodiversity assets to be submitted, which identify the impacts of development and any necessary mitigation and/or compensatory measures, and consider the presence of invasive, non-native species and their management, including biosecurity measures <u>and the eradication of invasive species. To ensure compliance with national biodiversity policy and legislation, applicants are advised to refer to the Essex Biodiversity Validation Checklist (or its successor), available on the Essex County Council website.</u>
Policy PL10 Page 114-115	<i>Re-order Policy titles as follows:</i> <del>2.</del> <u>1.</u> Water Management <del>3.</del> <u>2.</u> Flooding <del>4.</del> <u>3.</u> Sustainable Drainage Systems (SuDS) <del>1.</del> <u>4.</u> Water Quality

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PL11 Implementation Para 13.78 Page 119	Designated heritage assets <del>can</del> include listed buildings, curtilages of listed buildings, conservation areas, <del>archaeological remains</del> , Scheduled Monuments and <del>Registered historic</del> Parks and <del>g</del> Gardens. <u>Such assets, except Conservation Areas, are administered by Historic England. Non-designated assets include Locally listed Buildings, -are known as non-designated assets. Historic England administers national designations- which include all designated heritage assets apart from conservation areas, monuments, sites, places, areas or landscapes which a Local Authority deems to have special historic or architectural interest.</u>
PL11 Implementation Para 13.83 Page 119	Where planning permission is required for alterations or additions to listed and locally listed buildings, <del>a Statement of Significance and</del> a Heritage Statement.....
<b>CHAPTER 14</b>	
Local Plan Strategic Objectives Para 14.4 Page 124	..... <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>
Policy H1 Page 125	Development of the Strategic Housing Site East of Harlow ( <u>allocated in Policy HS3</u> ) and other sites for housing (allocated in <del>the Strategic policies</del> , <u>Policy HS2</u> ) will be supported..... ....Development of all allocated housing sites must <del>accord</del> <u>be in general conformity</u> with the <u>appropriate guidance, including principles of</u> the Harlow and Gilston Garden <del>Town Spatial Vision</del> <u>Town Vision</u> and <del>Design Charter</del> <u>Design Guide</u> .
H1 Justification Para 14.5 Page 125	The housing requirement for the district is set out in <del>the Strategic policies</del> <u>Policy HS1</u> .....
H1 Implementation Para 14.7 Page 125	..... <del>Given the important contribution that housing sites in Harlow will make to the development of the new Garden Communities in the Harlow and Gilston Garden Town, the development of all allocated housing sites must accord with the Garden Town Spatial Vision and Design Charter.</del>
Policy H4 Page 128	..... (c) the existing building is unfit for human habitation, and cannot be <del>economically</del> <u>viably</u> improved and brought back into residential use;.....
H5 Justification Para 14.23 Page 129	National <u>planning</u> policies require Local Plans to support Building <del>Control</del> <u>Regulations</u> .....
H5 Implementation Para 14.26 Page 129	The Building <del>Control</del> <u>Regulations</u> Part M4(2) and Part M4(3) .....

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H5 Implementation Para 14.27 Page 130	.....required to be of Building <del>Control</del> <u>Regulations</u> Part M4(3) standard.....
H9 Implementation Para 14.45 Page 133	This policy will be delivered through the approval of individual planning applications, <del>sites allocated in the Strategic policies</del> and.....
Policy H10 Page 134	..... (a) the development would not have an unacceptable adverse effect on the character of the locality, the appearance of the street scene, the amenities enjoyed by the occupiers of neighbouring dwellings, <del>or designated and locally identified habitats</del> <u>biodiversity or geodiversity assets, or Other Open Spaces</u> ;.....  .....(d) the development would be within a reasonable distance of shops, schools, healthcare and <del>other</del> community/leisure facilities;.....
H10 Justification Para 14.47 Page 134	<del>The Strategic policies allocate pitches for Travellers, allocate pitches for Travellers</del> <u>Policy HS4 identifies the restoration of pitches at the Fern Hill Lane site to fulfil the need for the Travelling Community in Harlow</u> over the Local Plan period.....
<b>CHAPTER 15</b>	
Introduction Para 15.3	..... A key priority is to maintain and enhance the role of Harlow Town Centre and, as such, the policies seek <u>to restrict</u> the sub-division of units.
324 Introduction Para 15.4	.....This will ensure that sites in the Town Centre are considered in the first instance, followed by edge-of-centre, then Neighbourhoods, then <del>and</del> Hatches, <u>then Retail Parks</u> . Out-of-centre locations will only be considered as a last resort. Development must be appropriate to the function, size and character of the centre <u>in which it would be located</u> .
Local Plan Strategic Objectives Para 15.6 Page 138	<u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>
Policy PR1 Page 139	Development in <u>existing</u> Employment Areas.....  .....(b) the development will <u>materially</u> increase the number of jobs for local residents;.....
Policy PR1 Page 139	Development in the <u>existing</u> Neighbourhood Service Areas.....  ..... (a) evidence <del>must be</del> <u>has been</u> provided to demonstrate that the unit has been vacant and actively marketed for Use Class B1 to the satisfaction of the Council for at least 12 months or for an appropriate period of time <del>previously</del> agreed with the Council;.....

PR2 Implementation Para 15.16 Page 141	..... <del>The Council will determine how long a marketing exercise should be on a case by case basis.</del>
Policy PR3 Page 142	1. Provision of employment floorspace Employment development outside <u>existing</u> Employment Areas and Neighbourhood Service Areas will be <del>permitted</del> <u>supported</u> where:  .....2. Loss of employment floorspace Development resulting in the loss of Use Classes B1, B2, B8 and waste uses will <del>not</del> be permitted outside of the district's Employment Areas and Neighbourhood Service Areas <del>unless</del> <u>where</u> it meets the following criteria:.....
PR4 Implementation Para 15.24 Page 143	This policy will be applied to major developments and secured through <del>a</del> planning obligations,.....
PR5 Implementation Para 15.27 Page 144	<del>The Strategic policies</del> <u>Policy RS1</u> sets out the hierarchy of retail centres in Harlow.....
PR5 Implementation Para 15.28 Page 145	....that the proposal will not have a negative impact on the vitality and viability of <del>existing centres</del> <u>the town centre</u> and that the development increases overall sustainability and accessibility.....
PR5 Implementation Para 15.29 Page 145	This policy seeks to maintain active frontages in <del>the Town Centre</del> <u>all retail centres</u> to provide.....
Policy PR6 Page 145	1. Primary Frontages Development in the Town Centre primary frontages will be <del>permitted</del> <u>supported</u> where:.....
PR6 Justification Para 15.32 Page 145	This policy supports Main Town Centre Uses including commercial, leisure, evening and night-time uses in secondary frontages <del>where it is considered appropriate and where it strengthens the role of the Town Centre as a sub regional centre.</del>
Policy PR8 Page 147	Development in Neighbourhood Centre frontages, which falls in Use Classes A1, A2, A3, A4, A5, D1, D2, Sui Generis and C3, <del>must meet</del> <u>will be supported subject to</u> the following criteria:.....
PR8 Implementation Para 15.40 Page 147	.....calculated will be set out in <del>a Supplementary Planning Document (SPD)</del> <u>the Council's Authority Monitoring Report (AMR)</u> .
PR10 Implementation Para 15.48 Page 149	..... whilst still having the flexibility to offer space for bulky goods and mitigating the impact on the Town Centre's viability and vitality <u>from the sale of non-bulky goods.</u>

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**CHAPTER 16**

<p>Local Plan Strategic Objectives Para 16.4 Page 152</p>	<p>.....Objective 11 – <del>To p</del> Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u></p>
<p>L1 Implementation Para 16.7 Page 153</p>	<p>The Adopted Open Space, Sport and Recreation Supplementary Planning Document (SPD) (<u>or successor</u>) and.....</p>
<p>Policy L2 Page 154</p>	<p>1. Development for the provision of recreational, sporting, cultural and community uses and facilities</p> <p>Development for the provision of recreational, sporting, cultural and community uses and/or facilities, <del>including playing fields, play spaces, allotments and sports clubs,</del> will be <del>permitted</del> <u>supported</u> where it meets the following criteria:.....</p> <p>.....</p> <p>Developments that will result in the loss of all or part of any recreational, sportings, cultural <del>or</del> <u>and</u> community uses and/or facilities will not be <del>permitted</del> <u>supported</u> unless it meets one or more of the following criteria:</p>
<p>L2 Justification Para 16.10 Page 154</p>	<p>....allotments <u>and</u>, sporting facilities <del>and parks</del>. It also...</p>
<p>L2 Implementation New para after para 16.13 Page 155</p>	<p><u>Marketing of a use or facility that is surplus to requirements, as appropriate for the condition and existing use of the facility, must be undertaken by a suitably competent person. The Council will determine how long a marketing exercise should be on a case-by-case basis.</u></p>
<p>L3 Justification Para 16.15 Page 155</p>	<p>.....major new developments will contribute towards this. <u>This policy will also manage the relocation and loss of public art and will give due consideration to the historic significance of the artwork or its setting.</u> The Council will prepare a Public Art.....</p>

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CHAPTER 17	
Local Plan Strategic Objectives Para 17.8 Page 159	<p><u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u></p> <p>Objective <del>43</del><u>14</u> - Reduce the need to travel by vehicle <del>by ensuring</del> <u>and ensure</u> new development is sustainably located <u>and/or</u> accessible by sustainable <u>and innovative</u> modes of transport</p> <p>Objective <del>44</del><u>15</u> – Improve transport links, particularly for sustainable modes of transport, to <del>community facilities</del> <u>access all facilities and jobs</u>.</p>
IN1 Implementation Para 17.13 Page 160	<p><del>New development proposals should investigate ways to reduce the use of the car and promote alternative ways to travel and this should be detailed in a supporting Travel Plan. Opportunities should also be sought to collaborate in the development of travel plans and travel planning measures across the wider Garden Town. For residential development, Applicants should look at.....</del></p>
IN3 Implementation Para 17.25 Page 162	<p><del>.....However, applicants will need to demonstrate the level of parking provided is appropriate and will not lead to problems of road congestion and movement and on-street parking on the adjacent highway network.</del></p>
327 Policy IN5 Page 164	<p>.....(a) <u>appropriate</u> evidence has been provided to show.....</p>
IN6 Implementation Para 17.36 Page 165	<p>Development can create a need for the provision of services, facilities and infrastructure both on-site and off-site. This provision may include <u>,but not be limited to</u>.....</p> <p>.....<u>(l) any other infrastructure items identified in the Local Plan.</u></p>
IN6 Implementation Para 17.39 Page 166	<p>.....phasing of development, and measures to meet other <u>Local Plan</u> policies and objectives, such as the protection of the environment.</p>
CHAPTER 18	
Housing Strategy and Growth Locations Page 169	<p>The number of planning permissions for HMOs that exceed more than one out of a row of five units, or are refused because of it. A full review of the policy will be undertaken two years after the date of adoption to establish the effectiveness of the policy based on this monitoring and information from HMO licensing.</p>
Housing Strategy and Growth Locations Page 169	<p>Percentage of new dwellings meeting the Building <del>Control</del> <u>Regulations</u> Part M4(2) Standard for accessible and adaptable homes</p>

Housing Strategy and Growth Locations Page 169	Number of dwellings for wheelchair users under the Building <del>Control</del> <u>Regulations</u> Part M4(3) standard in major residential development
Housing Strategy and Growth Locations Page 169	<del>At least 30% affordable housing for new major residential development, developed on site, with evidenced tenure mix, indistinguishable tenure and secure legal agreements for future occupancy</del>
Housing Strategy and Growth Locations Page 169	<del>Number of dwellings provided on sites greater than 50 dwellings for serviced plots for self-build, against the required supply. Sites of less than 50 dwellings will also be monitored for this provision</del>
Retail Ambitions and Town Centre Redevelopment Page 171	<del>Concentration of same Use Class in Neighbourhood Centres --- target No more than two adjacent units being in the same Use Class other than A1- --- relevant policy PR8</del>
Linking Development Sites to the Wider Environment Page 172	No <del>loss</del> -change in Green Belt, Green Wedge, <u>or</u> Green Finger <u>boundaries</u> , or <u>loss of</u> Other Open Space
Linking Development Sites to the Wider Environment Page 172	Change in number of <del>biodiversity and geodiversity designated assets in the district</del> <u>Local Sites in Positive Conservation Management</u>
Linking Development Sites to the Wider Environment Page 172	<u>Amount of land in new development incorporating Sustainable Drainage Systems --- target Increasing trend --- relevant policy PL10</u> <u>Amount of land in existing development which has been retrofitted to incorporate Sustainable Drainage Systems --- target Increasing trend --- relevant policy PL10</u>
Lifestyle Page 173	Change in <del>number</del> <u>provision</u> of public art in Harlow – target No net loss <del>in</del> <u>of</u> public art provision <del>and increase in amount</del> -- relevant policy L3
Lifestyle Page 173	<u>Quality of infrastructure, facilities and/or design which would improve health--- target Increase ---- relevant policy L4</u>

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## GLOSSARY

Allotment Page 180	<del>An 'allotment garden', or any parcel of land not more than five acres in extent, cultivated or intended to be cultivated as a garden farm, or partly as a garden farm and partly as a farm.</del> <u>Land cultivated for the production and personal consumption of fruit and vegetables.</u>
Ancient woodland Page 180	A protected area that has been wooded continuously since at <del>least</del> <u>the year</u> 1600 <u>or earlier</u> .
Article 4 Direction Page 180	Direction removing some or all <del>permitted</del> development rights <del>for example within a conservation area or curtilage of a listed building, permitted by</del> <u>The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)</u> . Article 4 Directions are issued by local authorities.
Attenuation Page 180	<u>Relating to rivers, attenuation is the</u> <del>R</del> reduction of peak flow and increased duration of a flow event.
<u>BREEAM (Building Research Establishment Environmental Assessment Method)</u> Page 180, after Biodiversity	<u>An international scheme providing independent third party certification of the sustainability performance of individual buildings, infrastructure, projects and communities. Assessment and certification can take place at a number of stages, from design and construction to operation and refurbishment.</u>
Building Regulations Page 180	The minimum <u>national</u> standards for design, construction and alterations to buildings, <del>They are developed by the Government and</del> <u>as</u> approved by Parliament.
Community Infrastructure Levy (CIL) Page 181	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in <del>their</del> <u>the local</u> area. <del>Learn more about the Community Infrastructure Levy.</del>
Conservation Area Page 181	An area of notable environmental or historical interest or importance which is <u>administered by the Council as a Designated Heritage Asset and benefits from additional planning controls to</u> <del>protected by law against it from</del> undesirable changes.
Heritage Asset Page 183	<u>Designated</u> Heritage Asset  <del>A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing). Includes listed buildings and their curtilages, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. Such assets have been judged to be of national importance in terms of architectural or historic interest, therefore benefitting from additional planning controls. They are administered by Historic England, with the exception of Conservation Areas which are administered by the Council. Some assets may also be on the Essex Historic Environment Record.</del>
Development Management Policies Page 181	Local Plan policies which guide applicants <u>applying for submitting planning applications to obtain</u> planning permission for proposed development. <del>The proposed development is assessed on these policies and other policies in the Local Plan. The Council, in its capacity as Local Planning Authority, uses these policies (and other policies in the Local Plan and national policies) to assess and determine such planning applications</del>

Development Plan Document (DPD) Page 181	Development Plan Documents provide a spatial strategy, <u>policies</u> and, where needed, a more detailed action plan for a specific area. They are accompanied by a Policies Map which illustrates the spatial extent of policies in the DPD. <u>The Local Plan is a DPD</u> .....
Duty to Co-operate Page 181	<del>Places</del> <u>Arising from the Localism Act 2011, this is</u> a legal duty on Local Planning Authorities.....
East of England Plan (EEP) Page 181	The <del>plan set out an overarching development strategy</del> <u>Regional Spatial Strategy for</u> the eastern region, <del>and was</del> officially revoked by Parliament in January 2013.
Employment Area Page 181	Area allocated for <u>employment uses</u> , to meet the <u>employment</u> needs of local residents and reduce out-commuting, offering a wide range of jobs to create a well-balanced community.
Enterprise Zone (EZ) Page 182	An area in which <del>state</del> incentives such as tax concessions <u>and relaxed planning controls</u> are offered to encourage business investment <u>and development</u> .
Flood Zone Page 182	<del>..... Developers and local authorities should seek to reduce the overall level of flood risk, relocating development sequentially to areas of lower flood risk and attempting to restore the floodplain and make open space available for flood storage.....</del>
Green Belt Page 182	An area of open land around an urban area, on which <del>building</del> <u>inappropriate development</u> is restricted, primarily to prevent unrestricted sprawl <u>and to provide the other nationally-set purposes of Green Belt land</u> .
Green Finger Page 183	Linear, open and predominantly green spaces which link to Green Wedges and <u>primarily</u> have a recreational/movement function, <u>as well as providing the other roles and functions as detailed in the Local Plan</u> .
Green Infrastructure (GI) Page 183	<del>Refers to multi-functional green spaces that provide habitat, flood protection, cleaner air, and cleaner water. Green Infrastructure is multi-functional natural and man-made urban and rural green space, including parks, playing fields, woodlands, allotments and wildlife corridors, rivers, canals, lakes and other bodies of water. At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs, and green walls, rain gardens and ponds.</del>
Green Wedge Page 183	A series of <u>open and predominantly</u> green spaces, kept free from <u>inappropriate</u> development, which run through the <del>urban area district</del> and <u>provide roles and functions as detailed in the Local Plan, including allowing</u> residents to <u>easily</u> access <del>to important landscapes and the wider</del> countryside.
<u>Grow-on space</u> Page 183	<u>The development of a new commercial building(s) which will provide space to enable the business to expand in situ, without having to relocate to larger accommodation.</u>
<u>Home Quality Mark (HQM)</u> Page 183, after Hatch	<u>Used by developers to demonstrate the high quality of their housing, by providing impartial information from independent experts on a new home's quality. It indicates the health and wellbeing benefits, overall expected costs and environmental footprint arising from living in the new home.</u>

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<p><u>Locally Listed Building</u> Page 183, after Local Development Order</p>	<p><u>Buildings which do not quite meet the criteria for being nationally listed by Historic England, but which are still of architectural or historical importance in the local area. Such assets, which are non-designated heritage assets, have a degree of significance meriting consideration in planning decisions and are administered by the Council.</u></p>
<p>Local Plan Page 184</p>	<p><del>Q</del> <u>A Development Plan Document setting out the overarching strategy for an area, setting out the future development proposals for at least 15 years, with policies against which planning applications are determined. Accompanied by a Policies Map.</u></p>
<p>Major Development Page 184</p>	<p>Development involving <b>any</b> one or more of the following:          (a) the winning and working of minerals or the use of land for mineral-working deposits;          (b) waste development;          (c) the provision of <u>ten or more</u> dwellinghouses, <u>or where number of dwellinghouses is unknown, the site area is 0.5 hectares or more; where—</u>  <del>(i) the number of dwelling houses to be provided is 10 or more; or</del>  <del>(ii) the development is to be carried out on a site having an area of 0.5ha or more and it is not known whether the development falls within subparagraph (c)(i);</del>          (d) the provision of a building(s) <del>or buildings where the</del> - floor space to be <u>built is</u> <del>created by the development is</del> 1,000 sqm or more; or          (e) development carried out on a site <u>having with</u> an area of 1 hectare or more.</p>
<p>Minor Development Page 185</p>	<p>Development <del>involving the provision of</del> <u>involving any one or more of the following:</u>          (a) <del>1-9 between one and nine</del> <u>dwellinghouses (inclusive), and unless floorspace exceeds 1,000m<sup>2</sup> / under half a hectare)- or where number of dwellinghouses is unknown, the site area is less than 0.5 hectares; or</u>  <del>(b) office / light industrial up to 999m<sup>2</sup> / under 1 hectare</del>  <del>(c) general industrial up to 999 m<sup>2</sup> / under 1 hectare-</del>  <del>(d) retail up to 999 m<sup>2</sup> / under 1 hectare-</del>  <del>(e) gypsy/traveller site - 0 to 9 pitches-</del> <u>fewer than 10 pitches; or</u>          (c) any other use - floor space to be built is less than 1,000 sqm, or site area is less than 1 hectare.</p>
<p><del>National Park —</del> Page 185</p>	<p><del>The statutory purposes of national parks are to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities. National parks are designated by Natural England, subject to confirmation by the Secretary of State under the National Parks and Access to the Countryside Act 1949 (as amended).</del></p>
<p><u>Non-Designated Heritage Asset</u> Page 185, after New Town</p>	<p><u>Includes Locally Listed Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not nationally designated heritage assets. Such assets are administered by the Council and may be on the Essex Historic Environment Record.</u></p>
<p><u>Passivhaus</u> Page 186, after Other Open Spaces</p>	<p><u>Also known as ‘passive house’. A standard for energy efficiency in a building to reduce its ecological footprint, resulting in ultra-low energy buildings requiring little energy for heating or cooling, primarily using passive features such as solar gain or natural ventilation. Can be applied to offices and residential buildings, as well as both new and refurbished buildings.</u></p>
<p>People with disabilities Page 186</p>	<p>People <del>have</del> <u>are defined as having</u> a disability if they have a physical or mental impairment,.....</p>

Pollution Page 186	Pollution can arise from a range of emissions <u>and sources</u> , including smoke,.....
<u>Registered Parks and Gardens</u> Page 187, after Primary and Secondary Frontages	<u>Gardens, grounds, parks and other planned open spaces which are administered by Historic England and registered on the Register of Parks and Gardens of special historic interest in England. They are designated heritage assets and benefit from the associated additional planning controls.</u>
Scheduled Monument Page 187	Nationally important monuments, usually archaeological remains that are afforded greater protection against inappropriate development through the Ancient Monuments and Archaeological Areas Act 1979 (as amended). <u>Scheduled Monuments are designated heritage assets, administered by Historic England, and benefit from the associated additional planning controls.</u>
<u>Spatial Development Strategy</u> Page 187, after Source Protection Zones (SPZ))	<u>Broadly sets out how the Vision for Harlow and the Themes and Strategic Objectives of the Local Plan will be achieved and delivered. The aims of the Strategy include protecting and enhancing important areas which offer residents a good quality of life, and changing areas through new development to improve living standards for existing and future residents. The Key Diagram graphically represents the Strategy.</u>
<u>Strategic Growth Strategy</u> Page 188, after Strategic Flood Risk Assessment (SFRA)	<u>Provides the Strategic Policies to deliver the Spatial Development Strategy.</u>
<u>Statement of Common Ground</u> Page 187, after Statement of Community Involvement	<u>A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.</u>
Sui Generis Page 188	Uses of land or buildings not falling into any of the Use Classes identified by the <u>Town and Country Planning (Use Classes) Order 1987 (as amended)</u> , for example theatres, launderettes, car showrooms and filling stations.
Sustainable Drainage Systems (SuDS) Page 188	A sequence of management practices and control structures designed to drain surface water in a more sustainable fashion than some conventional techniques <u>and to mimic natural drainage as closely as possible.</u>

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# POLICIES MAP KEY – OLD

The Policies Map should be read with reference to the Local Development Plan policies.

## KEY

-  Area Outside District
-  Harlow District Council Boundary

### Housing Strategy and Growth Location

-  Housing Allocations: HS2/1-21
-  Strategic Housing Site (Harlow and Gilston Garden Town): HGT1; HS3
-  Gypsies and Travellers: HS4

### Economic Development and Prosperity Strategy

- Future Employment Floorspace: ED1
-  ED1-1 Harlow Business Park
  -  ED1-2 London Road
  -  ED1-3 East Road Templefields
- Protecting Existing Employment Floorspace: ED2
-  Neighbourhood Service Areas

### Retail Ambitions and Town Centre Redevelopment

- Retail Hierarchy and Protecting and Enhancing Existing Retail Centres: RS1; RS2; RS3
-  Town Centre (The Town Centre is subject to a separate Area Action Plan Development Plan Document) RS2
  -  Neighbourhood Centres
  -  Hatches
  -  Out of Centre Retail Parks

### Linking Development Sites to the Wider Environment

- Strategic Green Infrastructure: WE1; WE2
-  Metropolitan Green Belt
  -  Green Wedges
  -  Green Fingers
- Biodiversity and Geodiversity: WE3
-  Site of Special Scientific Interest (SSSI)
  -  Local Nature Reserves
  -  Local Wildlife Sites
- Heritage: WE4
-  Conservation Areas
  -  Scheduled Monuments
  -  Historic Parks and Gardens

### Strategic Infrastructure Requirements

- Infrastructure Requirements: SIR1
-  SIR1-1 Indicative North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout
  -  SIR1-2 Indicative East-West Sustainable Transport Corridor
  -  SIR1-3 Indicative Second River Stort Crossing at River Way
  -  SIR1-4 Indicative Access Route for Strategic Housing Site East of Harlow
  -  SIR1-5 Cemetery Extension
  -  SIR1-6 New Allotment Provision
- Waste and Minerals: SIR3
-  SIR3-1 Safeguarding Transhipment Site and Coated Stone Plant



Scale 1:10,000

Planning & Building Control Services,  
Civic Centre,  
The Water Gardens,  
Harlow,  
Essex  
CM20 1WG

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# POLICIES MAP KEY – NEW

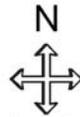
The Policies Map should be read with reference to the Local Development Plan policies.

## KEY

Designation/Allocation <i>(and map reference(s), if applicable)</i>	Main Relevant Strategic Policy/ies
Harlow District Council boundary	
Area outside district	
<b>HOUSING STRATEGY AND GROWTH LOCATIONS</b>	
Housing Allocations (HS2-1 to HS2-14)	HS1, HS2
Strategic Housing Site East of Harlow (Harlow and Gilston Garden Town) (HS3)	HGT1, HS1, HS3
Gypsies and Travellers (HS4)	HS4
<b>ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY</b>	
Future Employment Land (Harlow Business Park: ED1-1, London Road: ED1-2, East Road Templefields: ED1-3)	ED1
Protecting Existing Employment Areas	ED2
Neighbourhood Service Areas	ED2
<b>RETAIL AMBITIONS AND TOWN CENTRE REDEVELOPMENT</b>	
Town Centre (RS2-1)	RS1, RS2, RS3
Neighbourhood Centres (RS3-1)	RS1, RS2, RS3
Hatches	RS1, RS2, RS3
Out of Centre Retail Parks	RS1, RS3
<b>LINKING DEVELOPMENT SITES TO THE WIDER ENVIRONMENT</b>	
Metropolitan Green Belt	WE1
Green Wedges	WE1, WE2
Green Fingers	WE1, WE2
Site of Special Scientific Interest (SSSI)	WE3
Local Nature Reserves	WE3
Local Wildlife Sites	WE3
Conservation Areas	WE4
Scheduled Monuments	WE4
Registered Park and Garden	WE4

## STRATEGIC INFRASTRUCTURE REQUIREMENTS

Indicative North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout (SIR1-1)	SIR1, SIR2
Indicative East-West Sustainable Transport Corridor (SIR1-2)	SIR1
Indicative Second River Stort Crossing at River Way (SIR1-3)	SIR1, SIR2
Indicative Access Route for Strategic Housing Site East of Harlow (SIR1-4)	SIR1
Cemetery Extension (SIR1-5)	SIR1
Indicative Location of New Allotment (SIR1-6)	SIR1
Safeguarding Transshipment Site and Coated Stone Plant (SIR3-1)	SIR3



Scale 1:10,000

Planning & Building Control Services,  
Civic Centre,  
The Water Gardens,  
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Essex  
CM20 1WG

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# Sustainability Appraisal (SA) for the Harlow Local Development Plan

Adoption Statement

Harlow Council

November 2020

## Quality information

**Prepared by**

Alastair Peattie  
Associate Director

**Checked by**

Nick Chisholm-Batten  
Associate Director

**Verified by**

Steve Smith  
Technical Director

**Approved by**

Nick Chisholm-Batten  
Associate Director

## Revision History

Revision	Revision date	Details	Name	Position
v1	26/11/20	Draft for internal review	Alastair Peattie	Associate Director
v2	26/11/20	Draft for client review	Alastair Peattie	Associate Director
v3	30/11/20	Final version	Alastair Peattie	Associate Director

Prepared for:

Harlow Council

Prepared by:

AECOM Limited  
3rd Floor, Portwall Place  
Portwall Lane  
Bristol BS1 6NA  
United Kingdom

T: +44 117 901 7000  
aecom.com

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# 1. Introduction

## Background

- 1.1 The Harlow Local Development Plan was submitted to Government, for Examination by an appointed Planning Inspector, in October 2018. Following an extensive Examination process, the Inspector published a report into the Plan's legal compliance and soundness in November 2020. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Local Development Plan, incorporating modifications, is being put forward for adoption at a Full Council meeting on 10<sup>th</sup> December 2020.
- 1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM.

## SA explained

- 1.3 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Development Plan's contribution to sustainable development.
- 1.4 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations). SA incorporates the requirement for SEA and widens the scope of the assessment to also include social and economic issues.

## This SA Adoption Statement

- 1.5 Regulation 16 of the SEA Regulations sets out the post-adoption procedures with respect to SEA. It requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/ SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA Adoption Statement', and inform the public and consultation bodies of the availability of these documents. The consultation bodies are the Environment Agency, Historic England and Natural England.
- 1.6 In addition, Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the SA Report alongside the adopted Local Plan.
- 1.7 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the Harlow Local Development Plan must explain:
  - How environmental (and sustainability) considerations have been integrated into the plan;
  - How the SA Report has been taken into account during preparation of the plan;
  - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with;
  - How the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account; and
  - The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.8 In association with the above requirements, the SA Adoption Statement is structured as follows:

- **Chapter 2** presents the narrative for plan-making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above.
- **Chapter 3** describes how consultation responses have been taken into account through the Local Development Plan/ SA process.
- **Chapter 4** presents the monitoring programme for the SA.
- **Chapter 5** sets out some overall conclusions on the SA process.

## 2. How the SA process has informed and influenced the development of the Local Development Plan

### Introduction

- 2.1 The SA process has informed and influenced the Harlow Local Development Plan throughout its development. Reflecting this, five main SA documents have been prepared to accompany key points in plan development.
- 2.2 **Table 2.1** below summarise the key documents which have been prepared for the Local Development Plan and accompanying SA process to date.

**Table 2.1: Key documents in plan-making/ SA process**

Year	Plan-making	SA
2007 - 2009	Questionnaires and workshops	
2010		Scoping Report
2010	Issues and Options Consultation	Interim SA Report
2014	Emerging Strategy and Further Options	Interim SA Report
2016	Strategic Spatial Options Study for the HMA	SA of Strategic Spatial Options for the HMA
2017	Development Management Policies Document	
2018	Draft Pre-Submission Local Development Plan	SA Report
2020	Proposed Main Modifications	SA Report Addendum

- 2.3 As demonstrated in the table above, the SA process has been carried out iteratively and informed the development of the Local Development Plan at each key stage. The SA primarily influenced the Plan through the development and appraisal of reasonable alternatives as well as through the appraisal of the emerging Local Development Plan (proposed policies and allocations). This section is structured accordingly.

### Appraisal of reasonable alternatives

- 2.4 As part of the SA process, a series of reasonable alternatives or choices open to the Council with respect to the spatial development strategy were appraised and the findings fed back to the Council. In this way, the SA informed and influenced the development of the Local Development Plan.
- 2.5 The narrative within this section is structured according to the main plan-making/ SA steps, which are as follows:
- Issues and Options (2010);
  - Emerging Strategy and Further Options (2014); and
  - Draft Pre-Submission Local Development Plan (2018).

## Issues and Options (2010)

- 2.6 The Issues and Options document presented a number of alternative options including:
- six spatial options for growth that examined possible broad locations for development outside the existing built up area of Harlow;
  - six approaches to accommodating new employment; and
  - a series of emerging policy options.
- 2.7 A comparative appraisal of each of these options against the SA framework was carried out with the findings presented in an Interim SA Report (2010). The findings of the SA and consultation responses fed into subsequent plan-making.

## Emerging Strategy and Further Options (2014)

- 2.8 At this stage top-down and bottom-up options were explored based on the evidence at the time and used to identify nine spatial strategy alternatives, which are presented in the table below.

**Table 2.2 Alternative spatial strategies in 2014**

### Alternative spatial strategies

<b>1a</b>	Focused on Priority Regeneration Areas providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>1b</b>	As per 1a plus additional growth to the west and south of the district and to the north of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>2a</b>	Environmental Constraints Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>2b</b>	As per 2a plus additional growth to the south west and north east of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>3a</b>	Passenger Transport Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>3b</b>	As per 3a plus additional growth to the north of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>4a</b>	Regeneration and Landscape Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
<b>4b</b>	As per 4a plus additional growth to the west and north east of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
<b>5</b>	Northern Bypass Led Option providing approximately 20,000 dwellings and 18,121 jobs in and around Harlow

- 2.9 The nine options above were appraised through the SA process with the findings presented in Chapter 12 of the Interim SA Report that accompanied the Emerging and Further Options Document on consultation in 2014. The findings of the SA and representations received fed into subsequent plan-making.

## Draft Pre-Submission Local Development Plan (2018)

- 2.10 Subsequent to the Emerging Strategy and Further Options consultation in 2014, the evidence base and further technical work was progressed. It was recognised that further work was needed to refine understanding of spatial strategy alternatives (i.e. continue the process of refinement discussed above)<sup>1</sup> and ultimately arrive at reasonable alternatives for appraisal/consultation.

<sup>1</sup> National Planning Practice Guidance is clear that understanding of alternatives should be 'refined' over time through the SA process.

## Developing Reasonable Alternatives for the West Essex and East Hertfordshire Housing Market Area

2.11 A three step approach was taken, which ultimately resulted in the establishment of a preferred broad spatial strategy for the West Essex and East Hertfordshire HMA, including a decision on the approach to growth in and around Harlow. Harlow was recognised as the most sustainable location within the HMA to focus residential development given its role as a sub-regional centre for employment, its Enterprise Zone status; its important location on the London Stansted Cambridge corridor and the wider economic growth aspirations for the town.

### Step 1 - Establish an understanding of housing and economic needs

2.12 A Joint Strategic Housing Market Assessment (SHMA) for the HMA was published in September 2015.<sup>2</sup> This evidence base document determined the objectively assessed housing need for Epping, East Herts, Harlow and Uttlesford District Councils. It should be noted that further work was carried out in August 2016 and more recently July 2017 based on an assessment undertaken after the publication of the latest 2016 population and household projections. The July 2017 assessment identified the full objectively assessed need for the SHMA as approximately 51,700 new homes. The updated information is considered later in this NTS as part of the story of how District-wide reasonable alternatives were developed in 2017.

### Step 2 - Develop and appraise spatial alternatives

2.13 In 2016, Epping Forest, East Herts, Harlow and Uttlesford District Councils commissioned a Strategic Spatial Options Study to identify options for distributing the housing need identified in the SHMA above and to inform the development of a Memorandum of Understanding (MoU) on the distribution of housing. The study identified the following reasonable strategic spatial options:

- Spatial options to deliver ~46,100 new homes across the SHMA area:
  - A. Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)
  - B. Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)
  - C. Less development at Harlow and two new settlements in East Herts (NB ~10,500 at Harlow)
  - D. Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA<sup>3</sup>)
- Spatial option to deliver ~49,638 new homes:
  - E. Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)
- Spatial option to deliver ~57,400 new homes:
  - F. Maximum growth across the HMA (NB ~ 20,985 at Harlow)

<sup>2</sup> Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings [www.efdclocalplan.org/technical-information/](http://www.efdclocalplan.org/technical-information/)

<sup>3</sup> Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion; Duty to Cooperate developments at East of Stevenage and East of Welwyn unchanged.

### Step 3 - Identify the preferred strategy for the HMA

2.14 The implications of the six options (A-F) were investigated through four means:

1. Transport modelling by Essex County Council to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure;<sup>4</sup>
2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water;<sup>5</sup>
3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation in particular; and
4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.<sup>6</sup>

2.15 In light of this investigation, the Co-op Member Board identified a Preferred Spatial Option to deliver around 51,100 new homes across the HMA for the plan period to 2033 set out in **Table 2.3** below.

**Table 2.3: The preferred broad strategy for the HMA**

Local Authority	Net new dwellings 2011-2033
East Hertfordshire District Council	approx 18,000
Epping Forest District Council	approx 11,400
<b>Harlow District Council</b>	<b>approx 9,200</b> (N.B. this target is higher than the identified OAHN at the time)
Uttlesford District Council	approx 12,500
<b>Total across the HMA</b>	<b>approx 51,100</b>
...of which the area in and around Harlow <sup>7</sup> will provide	approx 16,100

2.16 A further SHMA update was carried out in 2017 taking into consideration the latest relevant evidence including DCGL's 2014 based household projections (July 2016). These updates led to a revised OAHN for the HMA of 51,710 dwellings from a previous figure of 46,100 while the need for affordable housing remained largely unchanged from the 2015 SHMA.

2.17 The latest updates identified a slightly increased OAHN for three of the four local authorities in the HMA. However, as the increase had been largely anticipated and accounted for in the HMA level work and preferred strategy, the updated overall housing need across the entire HMA remained broadly consistent with what had already been agreed (signed Memorandum of Understanding, March 2017). As stated in paragraph 47 of the NPPF, local authorities should *"...ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..."*

2.18 It was not considered necessary to revisit alternatives for the level and distribution of growth for the HMA as set out in the signed MoU (March 2017). The SA of Strategic Spatial Options published in 2016 considered three alternatives for the overall level of growth in the HMA, which included the delivery of ~ 46,000, ~ 49,638 and ~ 57,400 new homes within the HMA.<sup>8</sup> As such, higher numbers including figures approximating to and in excess of 51,710 new dwellings had already been tested and so there was no need to revisit the HMA-level optioneering work.

<sup>4</sup> Essex County Council. West Essex and East Hertfordshire Local Plan Modelling. Technical Notes 1 to 6.

<sup>5</sup> Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

<sup>6</sup> East Herts, Epping Forest, Harlow and Uttlesford District Councils (2016) Harlow Strategic Site Assessment Report.

<sup>7</sup> 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

<sup>8</sup> Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

- 2.19 As a result, the HMA authorities were satisfied that the approach set out within the MoU will ensure that the predicted housing need of the HMA will be met over the course of the Local Plan periods.<sup>9</sup> Harlow Council's housing requirement therefore remained 9,200 dwellings as set out within the signed MoU (March 2017).

### Developing Reasonable Alternatives for the Harlow Local Development Plan

- 2.20 Returning to the Harlow Local Development Plan, in trying to establish reasonable alternatives for delivering the remaining housing requirement of 1,042 dwellings, it was important to remember that Harlow is not typical of most Districts. It is a former New Town with a planned layout which has been developed from a Master Plan. The consequence of this is that land was identified with some form of specific function.
- 2.21 The Master Plan sought to preserve the form of the original landscape and the natural features that gave the District its distinctive character; consequently the green areas were generally kept free of buildings and as natural as possible. Almost half of the land in Harlow is a form of open space, much of which is multi-functional, with 28% being designated as Green Wedges or Green Fingers, and 10% as Green Belt. These Green Wedges and Green Fingers are fundamental parts of the green infrastructure, as they contain multi-functional open spaces which are linked to other open spaces and the wider countryside.
- 2.22 Harlow's unique character created from key master planning principles has resulted in a strong relationship between the urban form and the Green Wedge network, through which transport corridors pass. The Green Wedges provide a series of connectable open spaces which link major facilities and services, offering a pleasant and attractive footpath, cycleway and bridleway system.
- 2.23 The District boundary reflects the original New Town designated area and, as such, is tightly drawn around the urban area. This means that, unlike many other Councils, Harlow does not have a large hinterland or neighbouring settlements in which to search for potential housing sites.
- 2.24 Through the site selection process the Council identified 21 available and suitable sites that could deliver around 1,147 new dwellings. The majority of these sites are previously developed land (PDL) with only three available and suitable open space sites identified with a capacity to deliver around 63 new dwellings. These open space sites were identified as being of low value and quality through the Harlow Open Space and Green Infrastructure Study (2013).<sup>10</sup>
- 2.25 As set out above, the District boundary is tightly drawn around the urban area, reflecting the original New Town designated area. This means that there are limited opportunities for development on greenfield sites on the edge of the town and within the District's boundary. This leaves the Green Wedges, Green Fingers and other areas of open space which are fundamental to the drainage network, green infrastructure and unique character of Harlow. Taking all these factors into account, no other available, suitable or deliverable sites were identified through plan-making that could provide further capacity and feed into the development of reasonable alternatives for meeting the additional housing requirement of 1,042 dwellings.
- 2.26 In line with the NPPF (2012) and given the importance of the open spaces within Harlow, it was recognised that any alternative should seek to maximise the use of PDL to meet the remaining housing requirement of 1,042 dwellings. It was therefore considered reasonable that alternatives for the additional housing requirement should focus on this issue by exploring increased densities on PDL.
- 2.27 It was determined by the Council that increased densities would be most appropriate for PDL sites that are:
- located within or in close proximity to the town centre where high density schemes may be more suitable utilising existing facilities and public transport in the town centre;

<sup>9</sup> It should be noted that Uttlesford District Council published a Regulation 18 Local Plan for consultation in July 2017, which includes a housing target of 14,100 dwellings.

<sup>10</sup> Harlow Council (2013) Open Space and Green Infrastructure Study. Prepared by LUC.

- located within close proximity to future public transport nodes likely to come forward as part of the sustainable transport corridor work; and/or
- located within the District's Hatches<sup>11</sup> where higher density would stimulate regeneration due to their close proximity to public transport.

2.28 For those PDL sites meeting the criteria above both a moderate and high density option were explored. The Council calculated the alternative densities so that they would reflect similar applications at town centre/ neighbourhood centre sites within Harlow as well as the sustainability of the sites in terms of access to public transport and facilities/ services.

2.29 Based on the above, three reasonable alternatives were identified to meet the additional housing requirement of 1,042 dwellings and these are set out in **Table 2.4** below.

---

<sup>11</sup> Hatches sit below the town centre and district centres in the retail hierarchy. They serve specific local needs and provide for a range of community services.

Table 2.4: The reasonable alternatives

Ref	Location	Justification for increase in density	Site Size (ha)	Option A Preferred Approach		Option B Moderate density on certain PDL sites		Option C High density on certain PDL sites	
				Density (dph)	Capacity	Density (dph)	Capacity	Density (dph)	Capacity
1	Princess Alexandra Hospital	Close to town centre	14	43	650	120	1400	200	2800
2	Stow Service Bays		0.5	196	70	196	70	196	70
3	Land east of Katherines Way, west of Deer Park		2.37	30	69	30	69	30	69
4	Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery		0.93	45	42	45	42	45	42
5	Land south of Clifton Hatch		1	36	36	36	36	36	36
6	Riddings Lane	Close to sustainable transport corridor node	1.56	22	35	40	62	120	187
7	Kingsmoor Recreation Centre		0.8	44	35	44	35	44	35
8	The Evangelical Lutheran Church, Tawneys Road		0.18	195	35	195	35	195	35
9	Land east of 144-154 Fennells		0.81	28	23	28	23	28	23
10	Pollard Hatch plus garages and adjacent land	Hatch regeneration scheme	0.44	45	20	65	31	100	44
11	Land between Second Ave and St. Andrews Meadow		0.42	38	16	38	16	38	16
12	Coppice Hatch and garages	Hatch regeneration scheme	0.34	47	16	65	22	100	34
13	Sherards House		0.47	32	15	32	15	32	15
14	Elm Hatch and public house	Hatch regeneration scheme	0.2	65	13	65	13	100	20
15	Playground west of 93 - 100 Jocelyns		0.39	30	12	30	12	30	12
16	Fishers hatch	Hatch regeneration scheme	0.19	52	10	65	12	100	19
17	Slacksbury Hatch and associated garages	Hatch regeneration scheme	0.24	41	10	65	16	100	24
18	Garage blocks adjacent to Nicholls Tower		0.34	29	10	29	10	29	10
19	Stewards Farm		0.5	20	10	20	10	20	10
20	Land between Barn Mead and Five Acres		0.32	31	10	31	10	31	10
21	Pypers Hatch	Hatch regeneration scheme	0.19	54	10	65	12	100	19
<b>TOTAL DWELLINGS</b>				<b>Option A 1,147</b>		<b>Option B 1,951</b>		<b>Option C 3,530</b>	

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- 2.30 The three reasonable alternatives identified above were subject to appraisal through the SA process. The summary appraisal findings were presented in Chapter 6 and the detailed appraisal matrices presented in Appendix IV of the SA Report that accompanied the Draft Pre-Submission Local Development Plan on consultation in May 2018 and which was submitted alongside the District Plan for independent Examination in October 2018. The findings of the SA informed the Council's outline reasons for selecting the preferred approach (Option A) in light of the alternatives considered, see Chapter 7 of the SA Report (2018).

## Appraisal of the Draft Plan

- 2.31 At various stages of plan making, the SA process has appraised and informed emerging Local Development Plan policies and allocations.

## Issues and Options (2010)

- 2.32 As highlighted earlier in this Section, a number of developing policy options were appraised through the SA process at the Issues and Options Stage in 2010. This included policies for place shaping, housing, prosperity, infrastructure and lifestyles. The findings and recommendations of the SA work can be found in Chapter 14 of the Interim SA Report (2010).

## Draft Pre-Submission Local Development Plan (2018)

- 2.33 The Draft Pre-Submission Local Development Plan represented a first full draft plan, including a range of policies and allocations for guiding development in Harlow. These were developed to reflect the various evidence base studies prepared to support the development of the plan to date and also to reflect the findings of the appraisal of the preferred development strategy and reasonable alternatives through the SA process.
- 2.34 The Draft Pre-Submission Local Development Plan was accompanied by an Interim SA Report for consultation in 2018. This was designed to inform the consultation through presenting an appraisal of the planning policies and allocations presented in the plan. The appraisal of the Draft Plan in Chapter 9 of the SA Report proposed a number of recommendations and proposed mitigation measures with respect to the policies and allocations.

## Proposed Main Modifications (2020)

- 2.35 The Local Development Plan was submitted to Government for Examination in October 2018. It was then the focus of Examination hearings in March and April 2019. As a result of discussion at the hearing sessions and representations received during examination a series of modifications were proposed to the plan.
- 2.36 The proposed modifications were published for consultation alongside a SA Report Addendum in March 2020. The SA Report Addendum presented an appraisal of the proposed Main Modifications to the Local Development Plan. It also gave consideration to reasonable alternatives in light of the proposed Main Modifications.

### 3. Consultation responses and how they have been taken into account

- 3.1 Regulation 16 of the SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report were taken into account.
- 3.2 As discussed in Chapter 2 and Table 2.1, at each stage of the Local Development Plan's development, an SA Report was published alongside the Plan for consultation.
- 3.3 Consultation was carried out with:
- the three statutory bodies for SEA (the Environment Agency, Historic England and Natural England);
  - other key stakeholders; and
  - the general public.

#### Responses received at Regulation 18 and 19 stages

- 3.4 The responses received prior and subsequent to publication of the Local Development Plan have been presented in the Local Development Plan (Regulation 22) Consultation Statement. This includes a description of the key consultation processes undertaken for the Local Development Plan, a summary of the main issues raised by responses and how they have been addressed.
- 3.5 The Statement of Consultation can be accessed at the following location:
- <https://www.harlow.gov.uk/planning-and-building-control/planning-policy/new-local-plan/local-plan-examination>
- 3.6 Any representations referring directly to the published SA documents were taken into account and informed subsequent stages of the SA process.

#### Responses received at the Main Modifications stage

- 3.7 No representations were received that referred directly to the SA Report Addendum published in March 2020.

## 4. Monitoring

- 4.1 The SEA Regulations require that: “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*”
- 4.2 The Regulations also state that the SA Adoption Statement should set out “*...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*”
- 4.3 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA are based on data that is already being routinely collected at a local level by Harlow Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Development Plan.
- 4.4 **Table 4.1** therefore outlines a monitoring programme for measuring the Local Development Plan’s implementation in relation to the SA framework and outcomes, including areas where the SA identified significant effects or where significant opportunities for an improvement in sustainability performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Local Development Plan are achieved through the planning process.

**Table 4.1: SA monitoring programme for the Harlow Local Development Plan**

SA topic	Proposed measure
Air quality	<ul style="list-style-type: none"> <li>Monitor the Epping Forest SAC position through the development and implementation of the Air Pollution Mitigation Strategy.</li> <li>Harlow Council’s regular air quality review and assessment work as required by the Environment Act 1995.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Monitor the Epping Forest SAC position through the development and implementation of the Recreation Mitigation Strategy.</li> <li>Condition status of the Hatfield Forest SSSI.</li> <li>Net gain delivered through new development.</li> <li>Change in number of biodiversity and geodiversity designated assets in the district.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>Number of developments completed with SuDS measures implemented.</li> <li>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>Number of key local facilities in Neighbourhood Centres and Hatches.</li> <li>Delivery of strategic and local infrastructure to support new development.</li> <li>Amount of public open space, allotments, play space and sporting provision and facilities.</li> <li>Change in number and area of Recreational, Sporting, Cultural and Community Facilities.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Net additional employment floorspace up to 2033.</li> <li>Net loss of employment floorspace in Strategic Employment Areas and Neighbourhood Service Areas.</li> <li>Change in number of visitors.</li> <li>Change in employment floorspace outside Strategic Employment Areas and Neighbourhood Service Areas.</li> <li>Number of jobs created by the major developments.</li> <li>Net additional retail floorspace in existing Retail Centre.</li> </ul>

SA topic	Proposed measure
Historic environment	<ul style="list-style-type: none"> <li>• Change in number and area of heritage assets in the district.</li> <li>• Number of heritage assets at risk.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Net additional dwellings built.</li> <li>• Net additional dwellings built in Strategic Housing Site East of Harlow.</li> <li>• Number of new Gypsy and Traveller pitches completed.</li> <li>• Percentage of new dwellings meet the Building Control Part M4(2) Standard for accessible and adaptable homes.</li> <li>• Number of dwellings for wheelchair users under the Building Control Part M4(3) standard in major residential development.</li> <li>• Type and size of housing in major residential developments.</li> <li>• Percentage of Affordable Housing built in new major residential developments</li> <li>• Net additional land allocated for self-build.</li> </ul>
Land and waste	<ul style="list-style-type: none"> <li>• Percentage of recycling household waste.</li> <li>• Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Delivery of strategic and local infrastructure to support new development.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Percentage of new dwellings achieving the Optional Technical Housing Standard for water efficiency (no more than 110 litres per person per day).</li> </ul>

## 5. Conclusions on the SA process

- 5.1 This SA Adoption Statement demonstrates that a robust and iterative SA process has been progressed alongside plan-making, with appraisal findings feeding in to decision-making at each stage, and with five reports having been published for consultation alongside plan documents. Any representations received were taken into account and informed subsequent stages of the SA process.
- 5.2 In summary, the following reports were published as part of the SA process:
- SA Scoping Report (2010);
  - Interim SA Report (2010);
  - Interim SA Report (2014);
  - Reg 19 SA Report (2018); and
  - SA Report Addendum (2020).
- 5.3 Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the Draft Pre-Submission Local Development Plan (Regulation 19 version) in May 2018, presenting the required information. The report served to inform representations on the plan, and then served to inform plan finalisation.
- 5.4 This SA Adoption Statement is the final step in the SA process.



# Harlow Local Development Plan

## HRA Adoption Statement

Harlow District Council

Project number: 60470496

November 2020

Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Amelia Kent Senior Ecologist (ACIEEM)	Dr James Riley MCIEEM CEnvnv	Max Wade FCIEEM CEcol	Dr James Riley MCIEEM CEnv

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Distribution List

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Prepared for:  
Harlow District Council

Prepared by:  
Amelia Kent  
Senior Ecologist (ACIEEM)

AECOM Limited  
Midpoint, Alencon Link  
Basingstoke  
Hampshire RG21 7PP  
United Kingdom

T: +44(0)1256 310200  
aecom.com

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# 1. Adoption Statement

## Introduction

- 1.1 AECOM has been assisting Harlow District Council in undertaking a Habitats Regulations Assessment of the Harlow Local Development Plan, which began in in 2017 with the determination of Likely Significant Effects and continued through the HRA of the Submitted Strategic and Development Management Policies 2018 and through the Main Modifications.
- 1.2 The need for Appropriate Assessment is set out within British law by the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>1</sup>. The Regulations apply the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.3 In order to ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question:

### Box 1: The legislative basis for Appropriate Assessment

#### Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

*“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.*

- 1.4 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). This established a transition period, which is currently set to end on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for HRA will continue after the end of the Transition Period.
- 1.5 Over time the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Habitats Directive from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term ‘Habitats Regulations Assessment’ for the overall process and restrict the use of ‘Appropriate Assessment’ to the specific stage of that name.

## Scope of the Project

- 1.6 There is no guidance that dictates the physical scope of a HRA of a Development Plan Document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways rather than by arbitrary ‘zones’. Current guidance suggests that the following European sites be included in the scope of assessment:

<sup>1</sup> <https://www.legislation.gov.uk/ukxi/2017/1012/contents/made> [accessed 05/03/2019]. The regulations were subject to minor amendments in late 2018 but these do not affect the Local Development Plan HRA process or the tests that must be met

- All sites within the Harlow District boundary; and
  - Other sites shown to be linked to development within the District boundary through a known ‘pathway’ (discussed below).
- 1.7 Briefly defined, pathways are routes by which a change in activity provided within a Local Development Plan document can lead to an effect upon an internationally designated site. Guidance from the Ministry of Housing Communities and Local Government<sup>2</sup> states that the HRA should be ‘proportionate to the geographical scope of the [plan policy]’ and that ‘an AA need not be done in any more detail, or using more resources, than is useful for its purpose’ (MHCLG, 2006, p.6).
- 1.8 No European sites are located within the District boundary. There are four European sites that lie beyond the District boundary but are located within sufficient proximity that the HLDP could provide linking impact pathways that could impact the integrity of those European sites. These are:
- Epping Forest SAC;
  - Lee Valley SPA;
  - Lee Valley Ramsar site; and
  - Wormley-Hoddesdonpark Woods SAC.

## HRA Task 1: Likely Significant Effects (LSE)

- 1.9 Following evidence gathering, the first stage of any Habitat Regulations Assessment and the purpose of this assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- 1.10 “Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”
- 1.11 The objective is to ‘screen out’ those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.

## HRA Task 2: Appropriate Assessment (AA)

- 1.12 Where it is determined that a conclusion of ‘no likely significant effect’ cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that ‘Appropriate Assessment’ is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects. Therefore, it is legal to undertake the fullest level of technical assessment possible and still term the analysis an investigation into likely significant effects. Drawing the line between the studies that belong in the ‘likely significant effects’ section of analysis and those that belong in the ‘appropriate assessment’ of the analysis is therefore a judgment to be made by each competent authority. The ultimate legal requirement is that, whether the analysis is termed an investigation into likely significant effects or an appropriate assessment, the analysis supports the conclusion.

## Consideration of Likely Significant Effects

### Recreational pressure

- 1.13 Prior to considering any mitigation, the following Local Development Plan policies could not be dismissed in the assessment of likely significant effects from potentially impacting the integrity of

<sup>2</sup> CLG (2006) Planning for the Protection of European Sites, Consultation Paper.  
[http://webarchive.nationalarchives.gov.uk/20061101113831/http://www.communities.gov.uk/staging/embedded\\_object.asp?id=1502353](http://webarchive.nationalarchives.gov.uk/20061101113831/http://www.communities.gov.uk/staging/embedded_object.asp?id=1502353)

Epping Forest SAC or the Lee Valley SPA and Ramsar sites as a result of increased recreational pressure. These policies were therefore carried through to appropriate assessment:

#### Policies

- HS1 Housing Delivery: provides for 9,200 new dwellings between 2011 to 2033
- HS3 Strategic Housing Site East of Harlow
- HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Communities
- HS2 Housing Allocations
- ED4 Developing a Visitor Economy
- WE1 Strategic Green Infrastructure
- PL5 Other Open Spaces

#### Site Allocations

1.14 Residential site allocations provided by the Plan included land parcels that from review of freely available online imagery appear to be currently used as publicly accessible recreational spaces. These are:

- HS2-3: Land east of Katherines Way, west of Deer Park
- HS2-5: Land south of Clifton Hatch
- HS2-7 Kingsmoor Recreation Centre
- HS2-9: Land east of 144-154 Fennells
- HS2-11: Land between Second Avenue and St. Andrews Meadow

1.15 It should be noted that all these sites have since been deleted from the Local Development Plan.

## Air quality

1.16 Due to the large distances involved, it is very unlikely that any individual site allocations (either employment or residential) in Harlow, would affect the integrity of a European site in isolation; however, in combination effects with other plans and projects required further consideration. The following policies could not be dismissed as being unlikely to lead to significant effects 'in combination' as a result of increased atmospheric pollution contributions. Therefore, further discussion took place in the appropriate assessment:

- HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Communities
- HS1 Housing Delivery
- HS2 Housing Allocations
- HS3 Strategic Housing Site East of Harlow
- ED1 Future Employment Floorspace
- ED4 Developing a Visitor Economy
- RS2 Future Retail Floorspace

## Water resources

1.17 The following policies could not be dismissed from potentially posing likely significant effects upon the Lee Valley SPA and Ramsar sites as a result of changes to water levels due to abstraction for public water supply. They were therefore discussed further in the appropriate assessment:

Policies

- HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Communities
- HS1 Housing Delivery
- HS2 Housing Allocations
- HS3 Strategic Housing Site East of Harlow
- ED1 Future Employment Floorspace
- ED4 Developing a Visitor Economy

Site Allocations

- All residential and employment sites in combination

## Water quality

- 1.18 The following policies could not be dismissed from potentially posing likely significant effects upon the Lee Valley SPA and Ramsar sites as a result of changes to water quality from treated wastewater discharge. They were therefore considered further in the appropriate assessment:

Policies

- HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Communities
- HS2 Housing Allocations
- HS3 Strategic Housing Site East of Harlow
- ED1 Future Employment Floorspace
- ED4 Developing a Visitor Economy

Site Allocations

- All residential and employment sites in combination

## Findings of Appropriate Assessment

- 1.19 The HRA for the submitted Local Development Plan included both consideration of likely significant effects, and an appropriate assessment in combination with other plans and projects, particularly regarding growth in Epping Forest District. The appropriate assessment concluded no adverse effect on the integrity of Wormley-Hoddesdonpark Woods SAC, or Lee Valley SPA and Ramsar sites through any pathway of impact.
- 1.20 In addition, it concluded that should the measures recommended within the HRA be undertaken for Epping Forest SAC with regards to recreational pressure, the Harlow Local Development Plan had a suitable framework in place that development delivered would not affect the integrity of any European sites either alone or 'in-combination' with other plans and projects. The conclusion for Epping Forest SAC was based on the following considerations.

## Recreational pressure at Epping Forest SAC

- 1.21 An original visitor survey undertaken for Epping Forest Special Area of Conservation identified a 6.2km core catchment around the SAC but also confirmed that only 8 visitor postcodes (0.4% of the total) were located within Harlow District. It was thus determined that a conclusion of no adverse effect on integrity could be reached based on the most recent available published data provided that that, in line with the recommendations in the Harlow Local Development Plan HRA report and the emergence of the Interim Epping Forest Mitigation Strategy for recreational pressure:

1. The recreational pressure effect of Site HS2-9: Land east of 144 – 154 Fennells, allocated for 23 dwellings (this being the only housing allocation in Harlow that lies within 6.2km of the Epping Forest SAC) is addressed by financial contributions being made to the Epping Forest Mitigation Strategy for recreational pressure being devised by Epping Forest District Council, before that development is granted planning permission.
  2. Policy WE1 Strategic Green Infrastructure identifies the need for new Green Infrastructure to be planned into all new development. In line with this, the garden communities being created around Harlow should deliver a suitably large amount of natural accessible greenspace to maximise their recreational self-sufficiency.
- 1.22 Since the HRA report was produced, Site HS2-9 (Land East of 144-154 Fennells) has been deleted from the Local Plan as per Main Modification (MM) 3. As such, no development sites in Harlow Local Development Plan are located within the core recreational catchment of the Epping Forest SAC and thus none are required to make contributions to the recreational pressure mitigation strategy for Epping Forest SAC.

## Air pollution within 200m of Epping Forest SAC

- 1.23 The HRA for the Epping Forest Local Development Plan reported on a traffic and air quality modelling exercise for Epping Forest SAC, covering relevant roads within 200m of the site, and which explicitly took account of planned growth in the rest of the East Herts/West Essex HMA (including Harlow). Paragraph 4.14 of that HRA states that ‘... growth in Epping Forest District between 2014 and 2033 is the primary source of additional ammonia and NOx emissions on the modelled road sections and all other plans and projects make a negligible contribution to the in-combination effect...’. This reinforces the conclusion of the Harlow Local Development Plan HRA as it relates to air quality.
- 1.24 Scrutiny of the data provided in Appendix F of the submitted Epping Forest Local Development Plan HRA report (January 2019) supported that conclusion. The collective contribution of future growth in Harlow, East Herts and Uttlesford together is added to the model to create the data in scenario DS1. When one compares the numbers in this column of Appendix F with those in the preceding scenario/column (DM) it is seen that they are either identical or imperceptibly different (i.e. the difference is below, generally well below, 1% of the critical level or load for all pollutants, even when the three plans (Harlow, Uttlesford and East Herts) are modelled together). This shows the negligible contribution that growth within the boundaries of these three authorities is forecast to make to changes in air quality along the modelled roads. The air quality effect of growth on the SAC can therefore be addressed by focussing on mitigating growth in Epping Forest District. The new data therefore supports a conclusion of no adverse effect of the Harlow Local Development Plan on the integrity of Epping Forest SAC either alone or as part of an ‘in combination’ effect.
- 1.25 The total forecast change in AADT on modelled links due to all three Councils together never exceeds 100 AADT and is usually much less (as low as 3-7 AADT on some links). Most of this is probably attributable to Harlow. This translates into a negligible change in the air quality modelling as set out in the latest HRA. Natural England’s comments on the HRA acknowledged that it was appropriate to focus on growth in Epping Forest District and consider growth in the other authorities (Harlow, East Herts and Uttlesford) collectively resulted in a negligible effect. As commented by the Inspector in paragraph 23 of his report ‘*The HRA also concludes that the increase in air pollution from traffic movements arising from the HLDP would be negligible and Natural England accepts that in these circumstances it would not be reasonable to require mitigation*’.

## Main Modifications

- 1.26 Following the Examination into the Harlow Local Development Plan (hereafter referred to as ‘Local Development Plan’ or ‘the Plan’), the Inspector recommended a series of Main and Minor Modifications to be made to the Plan. It was therefore necessary for those modifications to be analysed in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the Local Development Plan.

- 1.27 Following the analysis of the Main and Minor Modification it was concluded that they will not lead to likely significant effects on European sites and do not undermine the conclusions of the HRA of the Local Development Plan. Indeed, some of the changes strengthen and reinforce the conclusions of that HRA that the Local Development Plan will not have adverse effects on the integrity of any European sites. Most notably, the inclusion of a new Policy WE3a adds protection for European sites outside of the District boundary as does the addition of text to expand on the reasoning for the duty to cooperate regarding delivery of mitigation strategies for in-combination effects on European sites impacted by multiple Districts.
- 1.28 A new visitor survey has been undertaken for Epping Forest SAC, although it has not yet been published, but this has not changed the Zone of Influence for Epping Forest SAC. In any event, the supporting text for Policy WE3a does allow for the changes in the Zone of Influence in the future; *“avoidance and/or mitigation measures set out in these strategies which will be updated from time to time to take account of new scientific evidence or monitoring information.”*

## Conclusion

- 1.29 In conclusion therefore the Harlow Local Development Plan meets its legal requirements in ensuring that no adverse effect on the integrity of any European sites will arise from its adoption, either alone or in combination with other plans or projects.
- 1.30 This is reflected in the opinion of the Inspector in paragraph 23 of his final report, in which he states that *‘With the policy safeguards in the modified plan [i.e. the insertion of Policy WE3a] I am satisfied that the HLDP, in combination with other plans and projects, will not adversely affect any European sites and the requirements of the Conservation of Habitats and Species Regulations 2017 are met’.*



## HARLOW DISTRICT COUNCIL

### ADOPTION STATEMENT

**Notice of the adoption of the Harlow Local Development Plan 2011 – 2033  
in accordance with  
The Planning and Compulsory Purchase Act 2004  
(as amended by Section 112 of the Localism Act 2011)  
and  
Sections 17, 26 and 35 of  
The Town and Country Planning Act  
(Local Planning) (England) Regulations 2012 (as amended).**

Notice is hereby given that (in accordance with the above-mentioned legislation) Harlow District Council formally adopted the Harlow Local Development Plan 2011 – 2033 on 10 December 2020.

The Harlow Local Development Plan 2011 – 2033 will shape growth and development in the Harlow District Council area until 2033. It allocates land for the provision of housing, jobs and infrastructure as well as providing protection for key environmental assets.

The Harlow Local Development Plan 2011 – 2033 contains policies and proposals that will be used to help in the consideration of planning applications submitted to the Council for determination.

The Harlow Local Development Plan 2011 – 2033 was the subject of an independent examination conducted by Mr David Reed, BSc DipTP DMS MRTPI, who was appointed by the Secretary of State for Housing, Communities and Local Government. The examination was undertaken against the 2012 National Planning Policy Framework (NPPF) under the transitional arrangements set out in Paragraph 214 of the 2019 NPPF as the Plan had been submitted before the 24 January 2019.

This examination commenced on 28 March 2019 and ran until 5 November 2020 and consisted of a number of public hearing sessions held at the Harlow Civic Centre between 28 March 2019 and 4 April 2019. Following the completion of the public hearing sessions, and at the request of the Inspector, a separate consultation was undertaken in respect of the Main Modifications between 12 March 2020 and 31 May 2020, and in respect of a focused consultation in relation to revised Government population projections, that took place between 8 September and 25 September 2020.

The Inspector's final report was published on **30 November** 2020 and confirmed that subject to a number of Main Modifications, the Harlow Local Development Plan 2011 – 2033 is sound, legally compliant and capable of adoption by the Council.

The recommended Main Modifications, along with additional and consequential Minor Modifications, have been included in the adopted Harlow Local Development Plan 2011 – 2033 which now carries full weight in the consideration and

determination of planning applications, and replaces the following Documents of the Council:

- The Saved Policies of the Adopted Replacement Harlow Local Plan July 2006.

All copies of the listed documents will be removed from Harlow District Council Civic Centre Reception, public libraries in the District, Latton Bush Centre and the Council's website.

Any person aggrieved by the Harlow Local Development Plan 2011 – 2033 may, with the leave of the High Court, make an application to the High Court under Section 113(3) of the Planning and Compulsory Purchase Act 2004 on the grounds that:

- i. the Harlow Local Development Plan 2011 – 2033 is not within the appropriate power conferred by Part 2 of the Planning and Compulsory Purchase Act 2004;

and/or

- ii. a procedural requirement (as defined within Section 113 (10) of the Planning and Compulsory Purchase Act 2004) has not been complied with.

Any such application to the High Court must be made not later than the end of the period of six weeks beginning with the day after the date on which the Harlow Local Development Plan 2011 – 2033 was adopted (i.e. six weeks from 11 December 2020 being the day after adoption).

In accordance with Regulations 26 and 35 of the 2012 Local Plan Regulations the following documents have been made available:

- i. the Harlow Local Development Plan 2011 – 2033 and supporting Policies Map;
- ii. this Adoption Statement;
- iii. the Sustainability Appraisal Adoption Statement;
- iv. the Habitats Regulations Adoption Statement; and
- v. the Inspector's final report.

These documents can be viewed on the Council's website at [www.harlow.gov.uk](http://www.harlow.gov.uk)

Paper copies of these documents will be made available to view at the following public locations in Harlow:

- Harlow Council Civic Centre Reception
- Latton Bush Centre
- Harlow Central Library
- Old Harlow Library
- Great Parndon Library
- Tye Green Library
- Mark Hall Library

Due to the ongoing Covid-19 pandemic, some of these locations may have reduced opening hours and/or be temporarily closed or unable to allow visitors to view documents. It is therefore advised that you contact a location before visiting. For the Harlow Council Civic Centre and Latton Bush Centre, the contact phone number is 01279 446 655. For the libraries, the contact phone number is 0345 603 7628.

Paper copies will be available to purchase on request.

A copy of this Adoption Statement will be sent to all parties who have asked to be notified of the adoption of the Local Plan and to the Secretary of State for Housing, Communities and Local Government.

For further information please refer to the Council's website at [www.harlow.gov.uk](http://www.harlow.gov.uk)

Andrew Bramidge  
Head of Environment and Planning  
December 2020