

CABINET
Thursday, 13 September 2018 at 7.30 pm
Council Chamber, Civic Centre

Members

Councillor Mark Ingall, Leader of the Council
Councillor Waida Forman, Deputy Leader and Portfolio Holder for Equality and Diversity
Councillor Mike Danvers, Portfolio Holder for Resources
Councillor Eugenie Harvey, Portfolio Holder for Community and Wellbeing
Councillor Danny Purton, Portfolio Holder for Environment
Councillor Lanie Shears, Portfolio Holder for Governance
Councillor John Strachan, Portfolio Holder for Regeneration
Councillor Emma Toal, Portfolio Holder for Economic Growth
Councillor Mark Wilkinson, Portfolio Holder for Housing

AGENDA

1. Apologies for absence
2. Declarations of Interest

Councillors' declarations of interest (if any) in relation to any items on the agenda.
3. Minutes (Pages 4 - 9)

To approve the minutes of the meeting held on 19 July 2018.
4. Matters Arising

Any matters arising from the minutes of the previous meeting.
5. Written Questions from the Public

To receive any questions from members of the public in accordance with Rule 10 of the Council Procedure Rules.
6. Written Questions from Councillors

To receive any questions from Councillors in accordance with Rule 11 of the Council Procedure Rules.
7. Petitions

To consider any petitions that have been referred to the Cabinet under the Council's Petition Scheme.

8. Forward Plan (Pages 10 - 21)

To note the Forward Plan, which lists all upcoming Cabinet decisions and provides notice of key decisions and those expected to be taken in private session.

9. Recent Decisions Taken by The Leader, Deputy or Portfolio Holder(s)

There have not been any decisions taken by Portfolio Holders under delegated powers since the last meeting of the Cabinet.

10. Local Development Plan - Submission to Planning Inspectorate for Examination Under Regulation 22 (Pages 22 - 1372)

11. Joint Finance and Performance Report, Quarter 1 2018/19
(Pages 1373 - 1391)

12. Housing Revenue Account, Quarter 1 Finance Report 2018/19
(Pages 1392 - 1399)

13. Capital Programmes, Quarter 1 Finance Report 2018/19
(Pages 1400 - 1413)

14. Annual Treasury Management Report 2017/18 (Pages 1414 - 1431)

15. Award of Contract for Domestic Waste and Recycling Collection Services
(Pages 1432 - 1446)

Appendix B of this report is confidential so any discussion of which will be held in private session.

16. Award of Contract for Advice Services (Pages 1447 - 1449)

17. MHCLG Business Rates Pilot Programme 2019-20 (Pages 1450 - 1455)

18. Communications from Committees/Working Groups/Parties and Panels

a) Referral from Scrutiny Committee - Civic Pride and Education
(Pages 1456 - 1461)

b) Referral from Scrutiny Committee - Review of Universal Credit in Harlow - Update Report (to follow)

19. Minutes of Panels/Working Groups

To note the following draft minutes of Cabinet appointed bodies. Minutes remain draft until approved by the relevant body.

- a) Minutes of meeting Wednesday, 25 July 2018 of Shareholder Sub Committee (Pages 1462 - 1466)
- b) Minutes of meeting Thursday, 9 August 2018 of Cabinet Overview Working Group (Pages 1467 - 1480)

20. Matters of Urgent Business

To deal with any matters of an urgent nature.

21. Exclusion of Press and Public

The Chair will move that the following item be taken in private session on the grounds that they are likely to involve the disclosure of exempt information as specified under Paragraph 3 of Part One of Schedule 12A of the Local Government Act 1972, if and so long as in all the circumstances of the cases, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Paragraph 3 - Information relating to the financial or business affairs of any particular person (including the authority holding that information).

22. Confidential Appendix B to Award of Contract for Domestic Waste and Recycling Collection Services (Page 1481)

**MINUTES OF THE CABINET
HELD ON**

19 July 2018

7.30 - 9.15 pm

PRESENT

Committee Members

Councillor Mark Ingall, Leader of the Council
Councillor Waida Forman, Deputy Leader and Portfolio Holder for Equality and Diversity
Councillor Mike Danvers, Portfolio Holder for Resources
Councillor Eugenie Harvey, Portfolio Holder for Community and Wellbeing
Councillor Danny Purton, Portfolio Holder for Environment and Member Champion for Highways and Infrastructure
Councillor Lanie Shears, Portfolio Holder for Governance
Councillor John Strachan, Portfolio Holder for Regeneration
Councillor Emma Toal, Portfolio Holder for Economic Growth
Councillor Mark Wilkinson, Portfolio Holder for Housing

Other Councillors

Councillor David Carter
Councillor Simon Carter
Councillor Joel Charles
Councillor Nick Churchill
Councillor Tony Edwards
Councillor Tony Hall
Councillor Michael Hardware
Councillor Andrew Johnson
Councillor Stefan Mullard
Councillor Russell Perrin
Councillor Chris Vince

Officers

Brian Keane, Managing Director
Simon Freeman, Head of Finance
Julie Galvin, Assistant Solicitor
Jane Greer, Head of Community Wellbeing
Andrew Murray, Head of Housing
Michael Pitt, Environment and Licensing Manager
Adam Rees, Governance Support Officer

20. **APOLOGIES FOR ABSENCE**

None.

21. **DECLARATIONS OF INTEREST**

None.

22. **MINUTES**

RESOLVED that the minutes of the meeting held on 14 June 2018 are agreed as a correct record and signed by the Leader, subject to the addition of Councillor David Carter to the list of those present.

23. **MATTERS ARISING**

None.

24. **WRITTEN QUESTIONS FROM THE PUBLIC**

None.

25. **WRITTEN QUESTIONS FROM COUNCILLORS**

None.

26. **PETITIONS**

None.

27. **FORWARD PLAN**

RESOLVED that the Forward Plan is noted.

28. **RECENT DECISIONS TAKEN BY THE LEADER, DEPUTY OR PORTFOLIO HOLDER(S)**

None.

29. **YEAR END 2017/18 JOINT FINANCE AND PERFORMANCE REPORT**

The Cabinet received a report that summarised the Council's financial and operational performance as at year-end 2017/18, proposed carryovers into 2017/18 and contributions to reserves.

Proposed by Councillor Mark Ingall (proposed by Councillor Mike Danvers) it was:

RESOLVED that Cabinet:

A Acknowledged the outturn position set out in section three of Appendix A to this report for the year ending 31 March 2018 (1 April 2017 – 31 March 2018), subject to recommendations in paragraphs 17 to 19, as follows:

- i) An under-spend on controllable service budgets of £807,000 or -1.34 percent of the gross General Fund budget;
- ii) A total General Fund underspend of £1,276,000 (-2.12 percent of the gross General Fund Budget) after including the impact of windfall income and non-controllable items; and

- iii) A General Fund balance of £4,321,000 after adjustments for the recommended transfers to reserves, carry forward requests and other one off proposals as set out in this report.
- B** Recognised the operational performance that has been achieved across all the Council services during 2017/18.
- C** Approved:
- i) The carry forward of £137,300 of budgets from 2017/18 to 2018/19 as set out in paragraph 17 of the report;
 - ii) The transfer to reserves of £592,811 as set out in paragraph 18 of the report;
 - iii) The transfer of £500,000 to the Harlow and Gilston Town Funding Reserve;
 - iv) The utilisation of future receipts from the Ram Gorse development for the purpose of enabling the balance of funding to deliver the new splash parks to be made available; and
 - v) The transfer of £26,000 to the Discretionary Services Fund as set out in paragraph 19(c) of this report in support of future Community Wellbeing initiatives.

30. **HOUSING REVENUE ACCOUNT OUTTURN REPORT 2017/18**

The Cabinet received a report that summarised the year-end 2017/18 position of the Housing Revenue Account and proposed some carryovers into 2018/19.

Proposed by Councillor Mark Wilkinson (seconded by Councillor Mike Danvers) it was:

RESOLVED that Cabinet:

- A** Acknowledged the HRA outturn for 2017/18 as set out in the report as follows:
- i) A favourable variation against the original budget adjusted for carryovers on operational/controllable budgets of £679,000 representing (-)1.28 percent of the gross Housing Revenue Account (HRA) budget.
 - ii) A total projected underspend of £3,908,000 representing (-)7.38 percent of the gross HRA budget.

- B** Noted working balances at 31 March 2018 of £14,104,000 in respect of the Housing Revenue Account and nil in respect of the Major Repairs Reserve.
- C** Approved carryovers of £222,000, as detailed in paragraphs 32 and 33 of the report, to meet commitments from 2017/18.
- D** Recognised the operational performance that has been achieved across all Council services during 2017/18.

31. **CAPITAL PROGRAMMES OUTTURN REPORT 2017/18**

The Cabinet received a report that summarised the year-end 2017/18 position of the Housing and Non-Housing Capital Programmes and proposed some carryovers into 2018/19.

Proposed by Councillor Mike Danvers (seconded by Councillor Mark Wilkinson) it was:

RESOLVED that Cabinet:

- A** Noted the outturn of the Council's Housing and Non-Housing Capital Programmes as at 31 March 2018, which is as follows:
 - i) Housing Capital Programme expenditure of £13,346,000 against an approved revised budget of £20,777,000.
 - ii) Non-Housing Capital Programme expenditure of £8,096,000 against an approved revised budget of £14,784,000.
- B** Approved the carryover of Housing Capital programme schemes to 2018/19 of £5,187,000 to meet capital commitments.
- C** Approved the carryover of Non Housing Capital Programme schemes to 2018/19 of £1,015,000 to meet statutory and agreed capital commitments in the core programme and £2,981,000 to meet commitments in respect of Prentice Place and the Enterprise Zone. The core programme carryover includes grant funding to support commitments of £32,000.
- D** Approved additional funding within the 2018/19 Programme for urgent Health and Safety works at the Playhouse. The funding requirement is £80,475 which is in addition to the carryovers pending approval by Cabinet 19 July, (Refer. paragraph 25).

- E Recognised the operational performance which has been achieved across all Council services during 2017/18.

32. **PROCUREMENT STRATEGY**

The Cabinet received a report which recommended the approval of an updated Procurement Strategy.

Proposed by Councillor Lanie Shears (seconded by Councillor Waida Forman) it was:

RESOLVED that:

- A The Procurement Strategy (attached as Appendix A) be approved as the framework for achieving the Council's objectives and aspirations in the procurement of goods, works and services.
- B The Head of Governance, in consultation with the Portfolio Holder for Governance, be authorised to make minor updates and amendments which reflect changes in the law.

33. **COMMUNAL HEATING PROGRAMME 2018/19**

The Cabinet considered a report which recommended the acceptance of a tender for the 2018/19 Communal Heating Programme.

Proposed by Councillor Mark Wilkinson (seconded by Councillor Mike Danvers) it was:

RESOLVED that:

- A The most economically advantageous tender submitted by Contractor A be accepted in the sum of £2,325,656.

34. **PUBLIC SPACE PROTECTION ORDER CONSULTATION**

The Cabinet received a report which recommended that consultation was undertaken on the introduction of a Public Space Protection Order within the Town Centre.

Proposed by Councillor Eugenie Harvey (seconded by Councillor Waida Forman) it was:

RESOLVED that:

- A Cabinet authorised the undertaking of consultation on the introduction of a Public Space Protection Order within Harlow Town Centre, pursuant to provisions of the Anti-social Behaviour, Crime and Policing Act 2014.

35. **COMMUNICATIONS FROM COMMITTEES/WORKING GROUPS/PARTIES AND PANELS**

None.

36. **MINUTES OF PANELS/WORKING GROUPS**

RESOLVED that the minutes of the following meetings are noted.

a) Minutes of meeting Thursday, 26 April 2018 of Safety Committee

37. **MATTERS OF URGENT BUSINESS**

None.

LEADER OF THE COUNCIL

Harlow Council Forward Plan

This plan contains all decisions that the Council's Cabinet expects to take over the coming year. Where relevant, each decision has been identified as a Key Decision or as involving consideration in private session.

The definition of a Key Decision is given in Article 12 of the Council's Constitution but is also set out here for clarity.

A 'Key Decision' means a Cabinet/Portfolio Holder decision which is likely:

- a) to result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates. For this purpose, expenditure or savings are deemed to be significant if they exceed £50,000; or
- b) to be significant in terms of its effects on communities living in an area comprising two or more wards in Harlow.

Each decision listed in this Forward Plan has been assigned an exemption status as follows:

Open – members of the press and public are expected to be allowed to attend during consideration of this matter.

Confidential – members of the press and public are expected to be excluded during consideration of this matter. The reasons for this exclusion will be stated in column 5, and relate to a lawful power to exclude the press and public when specific classes of information are being discussed, as contained in the [Local Government Act 1972](#).

A Decision Notice for each Key Decision is published within five days of it being made. Decision Notices and documents to be considered by decision makers are open for inspection on the Council's website www.harlow.gov.uk and at the Civic Centre, The Water Gardens, Harlow, CM20 1WG. Representations on an upcoming key decision can be made by writing to the Chief Executive, using the address above.

The current members of the Cabinet are as listed on the Council's website at the following page <http://moderngov.harlow.gov.uk/mgCommitteeDetails.aspx?ID=121>

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I007 557	Local Development Plan - Submission to Planning Inspectorate for Examination Under Regulation 22	Cabinet	13 Sep 2018 All Wards	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Environment (Councillor Danny Purton) Graeme Bloomer
I008 563	Joint Finance Performance Report, Quarter 1 2018/19	Cabinet	13 Sep 2018	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I008 564	Housing Revenue Account, Quarter 1 Finance Report 2018/19	Cabinet	13 Sep 2018	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers), Portfolio Holder for Housing (Councillor Mark Wilkinson) Simon Freeman, Andrew Murray

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 565	Capital Programmes, Quarter 1 Finance Report 2018/19	Cabinet	13 Sep 2018	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Housing (Councillor Mark Wilkinson), Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman, Andrew Murray
I008 566	Annual Treasury Management Report 2017/18	Cabinet	13 Sep 2018	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I009 243	Award of Contract for Domestic Waste and Recycling Collection Services	Cabinet	13 Sep 2018	Key decision: Yes Likely exemption status: Open	Officer's report	Councillor Mark Ingall, Portfolio Holder for Environment (Councillor Danny Purton) Graeme Bloomer

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 161	Award of Contract for Advice Services	Cabinet	13 Sep 2018	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Community and Wellbeing (Councillor Eugenie Harvey) Jane Greer
I009 319	Civic Pride and Education	Cabinet	13 Sep 2018	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Community and Wellbeing (Councillor Eugenie Harvey) Jane Greer
I008 206	Potential Redevelopment of Garage Site in the Readings	Cabinet	18 Oct 2018 Staple Tye	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Housing (Councillor Mark Wilkinson), Portfolio Holder for Regeneration (Councillor John Strachan) Jane Greer

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 568	Treasury Management Strategy Statement 2018/19: Mid-Year Review	Cabinet	6 Dec 2018	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I008 569	Joint Finance Performance Report, Quarter 2 2018/19	Cabinet	6 Dec 2018	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I008 740	Housing Revenue Account, Quarter 2 Finance Report 2018/19	Cabinet	6 Dec 2018	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Housing (Councillor Mark Wilkinson), Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman, Andrew Murray

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 570	Capital Programmes, Quarter 2 Finance Report 2018/19	Cabinet	6 Dec 2018	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers), Portfolio Holder for Housing (Councillor Mark Wilkinson) Simon Freeman, Andrew Murray
I009 377	Creation of HTS (Housing and Regeneration) Company	Cabinet	6 Dec 2018	Key decision: Yes Likely exemption status: Open	Officer's report	Leader of the Council (Councillor Mark Ingall), Portfolio Holder for Housing (Councillor Mark Wilkinson) Brian Keane
I009 345	Spatial Vision and Design Charter	Cabinet	6 Dec 2018 All Wards	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Environment (Councillor Danny Purton) Graeme Bloomer

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 604	Revision of London Road North Enterprise Zone Local Development Order	Cabinet	6 Dec 2018 Old Harlow	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Economic Growth (Councillor Emma Toal), Portfolio Holder for Environment (Councillor Danny Purton) Andrew Bramidge, Graeme Bloomer
I008 571	Debt Write Offs	Cabinet	6 Dec 2018	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I001 163	Non Housing Asset Management Strategy	Cabinet	6 Dec 2018 Subject to OWG Review	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Regeneration (Councillor John Strachan) Graeme Bloomer

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 572	Local Council Tax Support Scheme Proposals 2019/20	Cabinet	6 Dec 2018	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I008 573	Corporate Plan 2019/20	Cabinet	24 Jan 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Leader of the Council (Councillor Mark Ingall) Brian Keane
I008 574	Medium Term Financial Strategy 2019/20 - 2021/22	Cabinet	24 Jan 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I008 575	General Fund Budget 2019/20	Cabinet	24 Jan 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 576	Housing Revenue Account Business Plan 2018 - 2048	Cabinet	24 Jan 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers), Portfolio Holder for Housing (Councillor Mark Wilkinson) Simon Freeman, Andrew Murray
I008 577	Housing Revenue Account Budget 2019/20	Cabinet	24 Jan 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Housing (Councillor Mark Wilkinson), Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman, Andrew Murray

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 578	Capital Programmes 2018/19 - 2023/24	Cabinet	24 Jan 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers), Portfolio Holder for Housing (Councillor Mark Wilkinson) Simon Freeman, Andrew Murray
I008 579	Treasury Management Strategy 2019/20	Cabinet	24 Jan 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I007 560	Town Centre Area Action Plan - Approval of Regulation 19 Consultation	Cabinet	28 Feb 2019 Toddbrook; Little Parndon and Hare Street; Netteswell	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Regeneration (Councillor John Strachan) Graeme Bloomer

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I008 580	Joint Finance Performance Report, Quarter 3 2018/19	Cabinet	28 Mar 2019	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I008 581	Housing Revenue Account, Quarter 3 Finance Report 2018/19	Cabinet	28 Mar 2019	Key decision: No Likely exemption status: Open	Officer's report	Portfolio Holder for Housing (Councillor Mark Wilkinson), Portfolio Holder for Resources (Councillor Mike Danvers) Andrew Murray, Simon Freeman
I008 582	Capital Programmes, Quarter 3 Finance Report 2018/19	Cabinet	28 Mar 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers), Portfolio Holder for Housing (Councillor Mark Wilkinson) Andrew Murray, Simon Freeman

Ref.	Decision title	Decision Maker	Expected Date of Decision and Ward(s) affected	Key Decision and private consideration status	Documents to be considered by decision maker	Portfolio Holder and Lead Officer
I009 104	Homelessness Strategy	Cabinet	28 Mar 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Housing (Councillor Mark Wilkinson) Andrew Murray
I008 583	Debt Write Offs	Cabinet	28 Mar 2019	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Resources (Councillor Mike Danvers) Simon Freeman
I007 561	Town Centre Area Action Plan - Submission to Planning Inspectorate for Examination Under Regulation 22	Cabinet	Sep 2019 (date of meeting to be confirmed) Toddbrook; Little Parndon and Hare Street; Netteswell	Key decision: Yes Likely exemption status: Open	Officer's report	Portfolio Holder for Regeneration (Councillor John Strachan) Graeme Bloomer

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: LOCAL DEVELOPMENT PLAN – SUBMISSION TO PLANNING INSPECTORATE FOR EXAMINATION UNDER REGULATION 22

PORTFOLIO HOLDER: COUNCILLOR DANNY PURTON, PORTFOLIO HOLDER FOR ENVIRONMENT

LEAD OFFICER: GRAEME BLOOMER, HEAD OF PLACE (01279) 446270

CONTRIBUTING OFFICERS: DIANNE COOPER, PLANNING AND BUILDING CONTROL MANAGER (01279) 446595

PAUL MACBRIDE, FORWARD PLANNING MANAGER (01279) 446258

This is a Key Decision

It is on the Forward Plan as Decision Number I007557

The decision is not subject to Call-in Procedures for the following reason:

The decision stands as a recommendation to Full Council.

This decision will affect all Wards.

RECOMMENDED that Cabinet recommends to Full Council that:

- A** The Harlow Local Development Plan Pre-Submission Publication (2018) be formally approved for Submission to the Secretary of State in accordance with Regulation 22 of the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended).
- B** The updated Local Development Scheme (Appendix G to the report) is approved.
- C** Delegated authority is given to the Managing Director, in consultation with the Leader of the Council and the Portfolio Holder for Environment, to make and approve any minor and inconsequential amendments to the documents to be submitted in support of the Harlow Local Development Plan Pre-Submission Publication (2018) arising from the completion of the ensuing technical studies prior to the Public Examination.

REASON FOR DECISION

- A** To enable the Harlow Local Development Plan Pre-Submission Publication (2018) to be formally submitted to Government for Examination to ensure that

the Council has an up to date development plan in place and a Local Development Scheme that reflects the Local Development Plan and the Town Centre Area Action Plan's current time table in accordance with Regulation 22 of the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended).

- B** To ensure that any necessary supporting technical documents and resulting minor modifications' proposals can be submitted before examination of the Harlow Local Plan Development Plan Pre-Submission Publication (2018).

BACKGROUND

1. Following consideration by Cabinet on 25 January 2018 and Full Council on 29 March 2018, approval was given for the publication under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) of the Harlow Local Development Plan Pre-Submission Publication (2018) (the Plan). The Plan was publicised for consultation, between Thursday 24 May and Friday 6 July 2018, in accordance with legislation and the guidance set out in the Council's adopted Statement of Community Involvement (SCI).
2. Guidance from the Planning Inspectorate states that local plans published under Regulation 19 should be the local plan that a Council intends to submit under Regulation 22 for examination by an independent Planning Inspector (PINS) appointed by Government. The purpose of the Regulation 19 was, therefore, to enable representations to be made on the overall soundness of the local plan which will be considered by PINS at the Examination.
3. The Government's Planning Practice Guidance also notes that having received any representations on the publication version of the local plan, the local planning authority should submit the local plan along with a Regulation 22 statement which sets out the process, the representations and the supporting documents for PINS to examine on behalf of the Secretary of State. The documents that will be submitted to support the Plan are listed below and the key documents are attached in the appendices of this report. In addition the Council can indicate which representations, if the Inspector is so minded to make modifications, the Council will not oppose.
 - a) Local Development Plan (Appendix A);
 - b) Policies Map (Appendix B);
 - c) Regulation 22 Consultation Statement (Appendix C);
 - d) Sustainability Appraisal (Appendix D);
 - e) Habitats Regulation Assessment (Appendix E) ;
 - f) Statement of Community Involvement (Appendix F);

- g) Local Development Scheme (Appendix G);
 - h) Statement on Duty to Cooperate (Appendix H);
 - i) Equalities Impact Assessment (Appendix I);
 - j) Schedule of minor modifications (Appendix J);
 - k) Core Strategy Issues and Options Document;
 - l) Emerging Strategy and Further Options Document;
 - m) Development Management Policies Document; and
 - n) Supporting technical documents (list in Appendix K).
4. After the Plan and the accompanying documents are submitted to PINS, they will appoint an Inspector and identify a date when they will begin the Examination. The current indication is that date is likely to be in January/February 2019. The Inspector will:
- a) Assess if the duty to co-operate, legal compliance and soundness have been met;
 - b) Decide on the topics for examination; and
 - c) Invite participants to a round table discussion as part of the examination process.
5. If the Inspector considers that without modifications the plan would be unsound the Council is given the opportunity to agree those modifications. After the Examination the Inspector will then issue a report along with any recommended modifications. It is expected that such modifications will be consulted on. Depending upon the outcome of that consultation then the amended Plan will come back to Cabinet and Council to ratify the Plan's adoption.
6. This report seeks the approval of the Cabinet to recommend to Full Council that the Harlow Local Development Plan Pre-Submission Publication (2018) be submitted to Government for Public Examination.

ISSUES/PROPOSALS

Responses

7. In accordance with Regulation 22 there is a requirement for the Council to set out the main responses that have arisen from the Pre-Submission Regulation 19 Publication. These will be reported to the Inspector who will consider the matters raised during the Examination process. In total 72 submissions were received from organisations or individuals, amounting to 165 specific representations.

Some consider the Plan sound, others consider that modifications to specific policies and proposals are needed to make it sound, and others consider the Plan to be unsound. There are representations that support the Plan and others that oppose the policies and these are set out in full within the Regulation 22 Statement. A summary of the key representations for each policy area is set out below with an indication of which ones the Officers are proposing the Council should not oppose.

Harlow and Gilston Garden Town

8. Responses were mixed between some considering that the Harlow and Gilston Garden Town policies should only apply to sites within Harlow while others wanted more polices aimed towards the entire Garden Town. The Inspector will provide guidance whether the approach set out in the Plan is appropriate. As some of the overarching technical documents for the Garden Town have not yet been completed, some comments have stated more information was required on the Sustainable Transport Corridor, Vision and Design Charter, infrastructure funding, and on the Water Cycle study. These studies are currently in draft but should be completed before the Plan is examined, so this detail will be made available and any changes to the Plan that may be required will be suggested to the Inspector as minor modifications. Although it would be preferable that these documents had been completed, working in partnership and the relatively recent formation of the Garden Town has meant the work is not aligned with the Plan's timetable. Legal advice indicates that if these reports require that changes are made to the Plan they can be discussed at the Examination and any changes accommodated through the modification procedure. There is, however, a greater risk of not submitting the Local Plan before 24 January 2019, when the new National Planning Policy Framework (NPPF) comes into force which changes some requirements and would delay the Plan being examined, than waiting for completed technical reports. Elsewhere inspectors have accepted that, in the Government's drive for ensuring adopted local plans are in place, supporting documents can be finalised after a local plan has been submitted. As these are joint overarching documents, Officers consider it can be justified why these technical reports have not been completed before the Plan is submitted.
9. Princess Alexandra Hospital (PAH) has requested that the potential to improve facilities on the current hospital site should be recognised as well as the option to relocate. Currently there is uncertainty as to what PAH are proposing to do, but by the time of the Examination it should be clearer and the Council will then need to decide whether, if the Inspector is so minded, to make a modification that addresses their position if they do not relocate.

Housing

10. There were challenges that the new NPPF methodology on housing need should be used and that the joint Strategic Housing Market Area (SHMA) under estimated need. The housing trajectory and the five year housing supply's delivery were also challenged. Legal advice has been sought and confirmation given that the new NPPF methodology comes into force on 24 January 2019 and, providing the Plan is submitted before then, there is no requirement for the

new NPPF to be considered. It is noted that the Inspector for East Herts District Council's Local Plan approved the joint SHMA and Officers are confident that housing trajectory and the five year housing supply are robust.

11. PAH have also asked to reduce the number of houses allocated on the hospital site, but Officers suggest that this will be resolved by the Inspector's decision on the approach to PAH relocation or otherwise. There were representations against the requirements to provide accessible and adaptable housing, self-build and the housing mix, which Officers propose should not be altered.
12. There were also representations to remove three sites (south of Clifton Hatch, Fennells and Jocelyns) by residents and two sites by the Civic Society (east of Katherines and Stewards Farm) from the housing allocations and a representation to add a new housing site at Latton Farm. A technical process was followed to identify housing sites and Officers consider that this process is robust and will stand up to challenge either way.
13. In addition it was raised that the criteria by which planning applications will assess Houses in Multiple Occupation needs to be more stringent. Officers suggest that if the Inspector proposes to amend this policy, the modification will be accepted.
14. Representations have been received from the Home Builders Federation and a consultancy that specialises in making representations on local plans. These are generic representations and have not taken into consideration Harlow's situation with a tight administration boundary and limited opportunities for unallocated potential (developers' assessment) housing sites, so it will be for the Inspector to consider whether their position is justified, at the Examination.

Economy and Retail

15. Representations have stated that it is unclear how the employment shortfall identified in the joint evidence base work will be addressed across the Garden Town. Currently work is being undertaken at the Garden Town level on how this will be addressed and the results of this work will be submitted to the Inspector.
16. A request was made that the employment designations for sites being converted to residential use under the General Permitted Development Order should be deleted from the Policies Map. Officers consider such sites, which are in designated employment areas, should remain as employment land. Employment land should be protected to meet the other representation's concerns that there may be shortfall. It was also raised that the impact assessment for new retail facilities should be in line with the old NPPF. Officers have identified a higher impact assessment in line with evidence undertaken on retail needs in the Town and to ensure additional protection for the Town Centre.

Strategic Infrastructure

17. Representations were made on the need to apportion infrastructure provision across the Garden Town. This is being addressed in the Garden Town

Infrastructure Study. Policy SIR1 sets out infrastructure requirements that are required to be supported by all developments across the Garden Town. Requests have been made that education and PAH should be added to the items. Policy SIR1 allocates land for infrastructure items that have a land-use implication and are therefore indicated on the policies Map. As education facilities and the hospital relocation are yet to be identified or refined, the Policy Map is unable to include them and therefore not included in the Policy. The County Council have changed their way of indicating the size of schools and have, therefore, asked that references to forms of entry for education provision be deleted. Officers suggest that if the Inspector is minded to make that modification it will not be opposed.

18. The County Council have also raised the need to increase capacity of the household waste facilities to accommodate growth across Garden Town. Officers are aware that discussions are taking place regarding the potential of finding an alternative site which is not in the Enterprise Zone and, therefore, will not identify this as an acceptable modification.
19. Further details of the Sustainable Transport Corridor were requested in the representations and concerns raised over locating transport corridors in the Green Wedges. The Sustainable Transport Corridor work is underway and clarity will be given when this is completed. There were general representations about the dependency on external factors and co-operation needed to deliver major infrastructure items and over the lack of road capacity, health, education and infrastructure for the planned growth and the need for robust mechanism for the pro-rata of contributions. Although some of this provision and funding were addressed in the Harlow Infrastructure Delivery Plan, the wider Garden Town infrastructure work will identify the Garden Town's infrastructure requirements, the cost, provision and delivery. The County Council has proposed that their planning contribution document should supersede Harlow's policy. Officers propose that this modification is not supported as it is more appropriate that there is a holistic approach to cover the Garden Town's wider infrastructure requirements.
20. One representation has been made that the northern by-pass reference should be removed. Officers propose that such modifications are not supported.
21. There were some representations that related to encouraging drivers to use more sustainable modes of transport, to ensure a 60 percent modal shift by restricting car parking and the identification of a model hierarchy, but there was a separate representation which states that there is no evidence to justify provision of electric charging points. Officers propose to not oppose the former position, but consider there is sufficient evidence to justify the requirement of the latter position.
22. Where policies require more than what is considered the basics, developers have tended to make representations against such policies. The Broadband Policy is one such policy which is considered unreasonable because it is over and above Building Regulations requirements. Officers hope that the Inspector

will agree with the Council's approach that it is important to ensure more than the basic requirement is provided to improve the potential to meet future needs.

Placeshaping

23. There were range of representations covering the loss of green spaces, potential harm to biodiversity assets and the increase of flood risk related to new housing allocations. The housing need, arising from Harlow's residents, also has to be met and in selecting future housing sites a robust methodology has been undertaken which takes into consideration such issues. If some unforeseen circumstances arise then, when a planning application is assessed, there would be a requirement to mitigate against any harm or flooding risk arising.
24. A request has been made from Natural England that water assets are included in the Green Infrastructure definition. Officers propose that these modifications are supported, and that references to net biodiversity are also included.
25. Some developers stated that the Green Wedge policies appeared more restrictive than Green Belt policies and that there are issues with the Green Wedge and Green Belt Review studies which justify any changes to the boundaries. Officers disagree with such representations and would contest any such changes at the Examination, especially as Natural England has commended the approach taken in the Plan to Green Infrastructure, including Green Wedges and Fingers.

Leisure

26. Representations have been received that the leisure facility policy should be more flexible to recognise public open space and leisure provision may not always be achievable on smaller development sites. Officers consider that the policy allows in such cases payments towards improving off-site facilities which would be used by these residents and, therefore, would propose modifications to that policy. The public art policy has also been challenged that it is not compliant with planning obligations and NPPF. Officers consider that Harlow's Sculpture Town status will justify such a policy.

General

27. There has been a recent court case referred to as the 'Sweetman case' which requires councils to revisit the Habitat Regulation Assessment (HRA), a supporting document to the local plan, as the method of undertaking them has changed. The HRA can be revisited before the Examination as, in practice, other councils have had to undertake a new assessment during their examinations as a result of this case. Additionally, until Epping Forest District Council has completed its Mitigation Strategy for Epping Forest Special Area of Conservation, Natural England has taken the precautionary approach by not commenting. Natural England has also requested that the Council takes into consideration Harlow Woods SSSI and Hatfield Forest SSSI without providing any justification. A Mitigation Strategy will be drafted and the HRA reviewed in the light of the 'Sweetman case' and discussed with Natural England to provide

clarity on what is required for the SSSIs. Officers consider that this can be completed before the Examination so that Natural England's representations can be addressed and modifications agreed. This is the best option, in the circumstances, to ensure that the Plan is found sound.

28. There are representations suggesting revisions to a number of policies and supporting text which, in the representors' opinion, are required in order to make the Plan sound. A number of these representations relate to the promotion of alternative developments or because they wish policies to be deleted. However, Officers consider that there are no other representations that cause concern that the Plan would be found unsound and legal advice is being sought to confirm that conclusion.

Conclusion

29. Having reviewed the representations received it is considered that the overall strategic growth strategy, and the policies and proposals set out in the Pre-Submission Publication version of the Harlow Local Development Plan are sound. However, as discussed above, there are some representations that Officers consider should not be opposed if the Inspector is so minded to make modifications to address these representations. The schedule of minor modifications (Appendix I) sets out which representations Officers are proposing not to oppose.
30. In conclusion, and having regard to the representations discussed above and set out in Regulation 22, it is considered that the Harlow Local Development Plan Pre-Submission Publication (2018) is sound and that the Plan should be submitted to Government (PINS) for the formal Examination.

IMPLICATIONS

Place (Includes Sustainability)

As contained within the report.

Author: Jane Greer, Head of Community Wellbeing, on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

There are no specific financial implications arising from the report or its recommendations. However, the local plan will set out the preferred options for future development in and around Harlow and as a consequence the commercial and residential income that may well result from such development. Additional service provision may also be required as a direct result of such development activity and these issues will be considered in future budget setting processes and as development proposals are brought forward.

Author: Simon Freeman, Head of Finance

Housing

As outlined in the body of 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 report sets out the legislative framework and timescales for submission of the Local Plan. Specialist Legal advice has confirmed the view that the best course of action is to formally approve the Harlow Local Development Plan Pre-Submission Publication (2018) for submission, at this time.

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

Appendix A – Local Development Plan

Appendix B – Policies Map (circulated separately)

Appendix C – Regulation 22 Consultation Statement

Appendix D – Sustainability Appraisal

Appendix E – Habitats Regulation Assessment 2018

Appendix F – Statement of Community Involvement

Appendix G – Local Development Scheme

Appendix H – Statement on Duty to Co-operate

Appendix I – Equalities Impact Assessment

Appendix J – Schedule of Minor Modifications

Appendix K – List of Supporting Technical Documents to the Local Plan

Background Papers

Emerging Strategies

Issues and Options

National Planning Policy Framework (NPPF)

Technical Reports

Glossary of terms/abbreviations used

HRA – Habitat Regulation Assessment

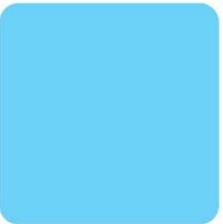
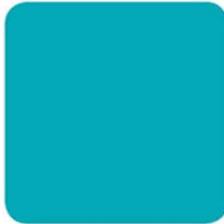
NPPF – National Planning Policy Framework

PAH – Princess Alexandra Hospital

PINS – Planning Inspectorate

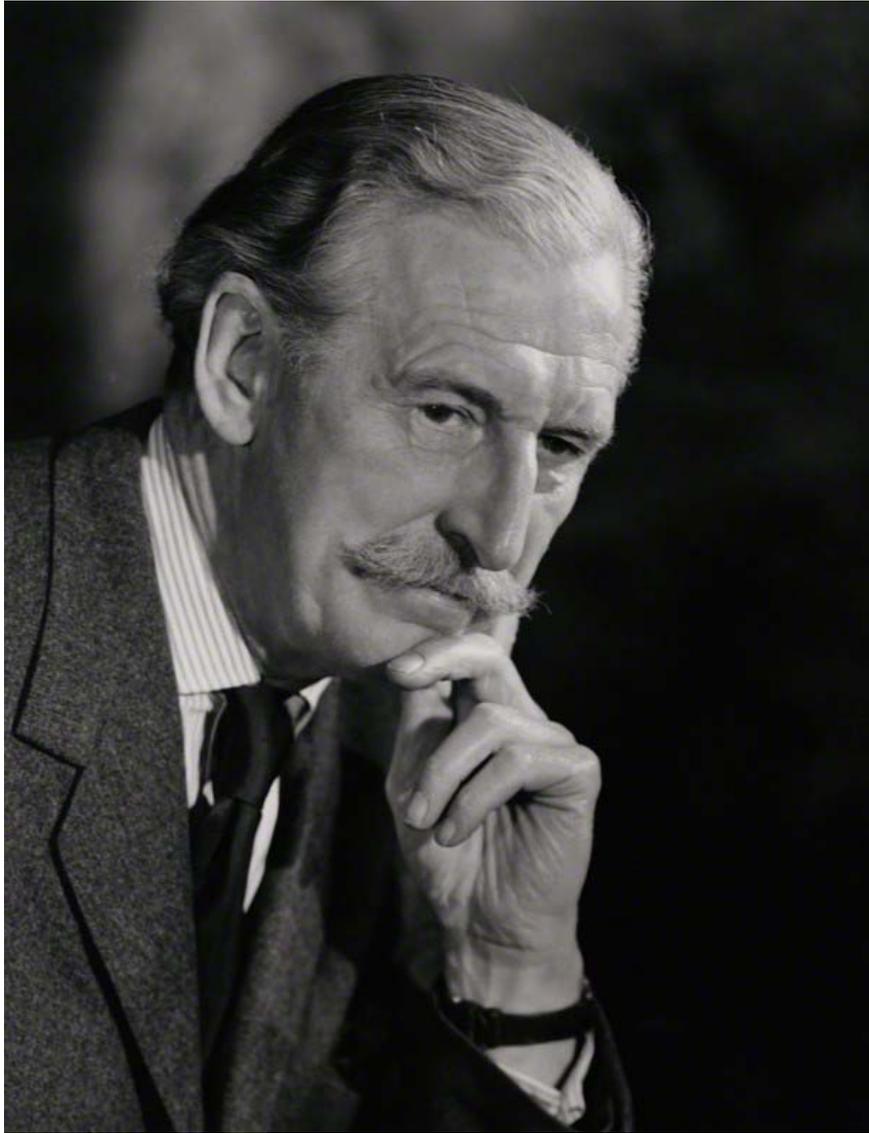
SCI – Statement of Community Involvement

SHMA – Strategic Housing Market Area



Harlow Local Development Plan Pre-Submission Publication May 2018





**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”**

Footnotes:

Photograph of Frederick Gibberd by Walter Bird, 3 July 1967. © National Portrait Gallery. Image reproduced under Creative Commons licence

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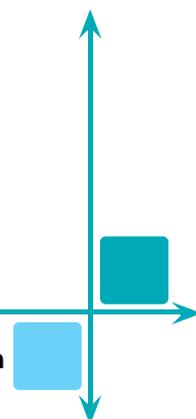
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Background

This document is the Harlow Local Development Plan: Pre-Submission Publication (the “Local Plan”).

Your views are sought on whether the Local Plan is sound.

The soundness is important because the Local Plan has to be found sound at a Public Independent Examination so it can be adopted and used by the Council.

In checking whether the Local Plan is sound, you should consider whether it:

- has been prepared using strong evidence;
- identifies strategic development which can be delivered by the end of the Local Plan period in 2033;
- sufficiently plans for Harlow’s housing, infrastructure and employment needs;
- sufficiently protects environmental assets, such as the Green Wedges and Local Wildlife Sites; and
- is consistent with national policies (which place great emphasis on the need for sustainable development).

More information on the tests of soundness can be found in Chapter 1.

The Publication period is Thursday 24 May 2018 to Friday 6 July 2018.

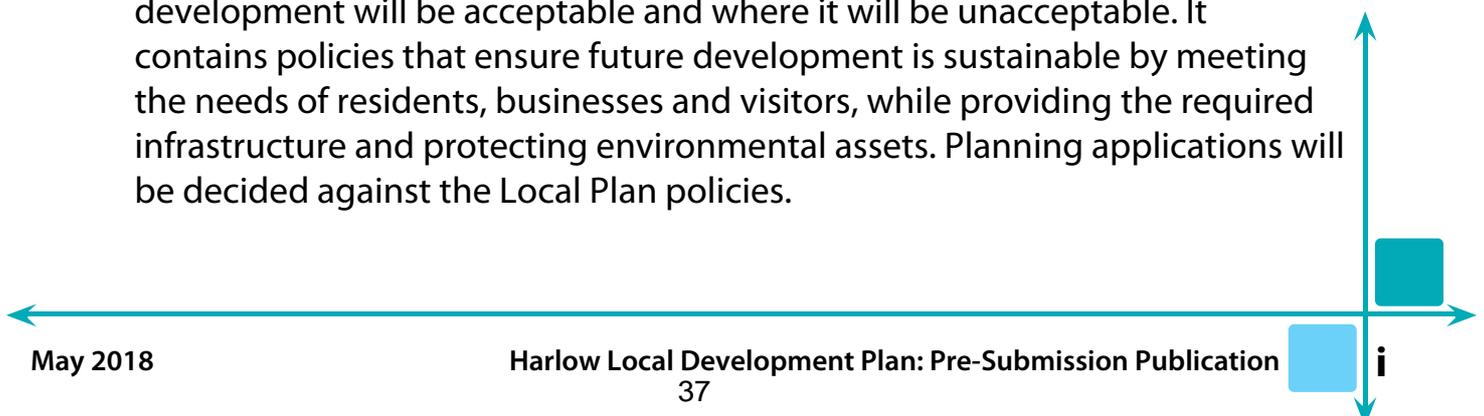
Can I view this document online?

You can download the Local Plan, Policies Map and all supporting documents on the Council’s website at www.harlow.gov.uk/local-plan

The Local Plan, Policies Map and certain supporting documents are also available to view, during normal opening hours, at the Harlow Civic Centre, Latton Bush Centre and libraries in Harlow.

What does the Local Plan say?

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 that ensure future development is sustainable by meeting the needs of residents, businesses and visitors, while providing the required infrastructure and protecting environmental assets. Planning applications will be decided against the Local Plan policies.



The Policies Map, which maps the planning policies and proposals across Harlow, accompanies the Local Plan, along with other documents such as the Sustainability Appraisal and Infrastructure Delivery Plan.

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.

I'm interested in a particular topic. Where can I find it?

It is important to read the Local Plan as a whole to understand the context and all issues, and the Contents pages help navigate the document. However, a number of issues were highlighted during previous Local Plan consultations as being particularly important. The table below details the chapters where the *main* information can be found on these issues:

ISSUE	MAIN RELEVANT CHAPTERS	
	Strategic Growth Strategy	Development Management
NEW INFRASTRUCTURE What is required?	11. Strategic Infrastructure Requirements	17. Infrastructure
GREEN SPACES How will they be protected?	10. Linking Development Sites to the Wider Environment	13. Placeshaping
TOWN CENTRE How will it be redeveloped?	9. Retail Ambitions and Town Centre Redevelopment	15. Prosperity
NEW HOUSING Where and how much will there be?	7. Housing Strategy and Growth Locations	14. Housing

What happened with the previous consultations?

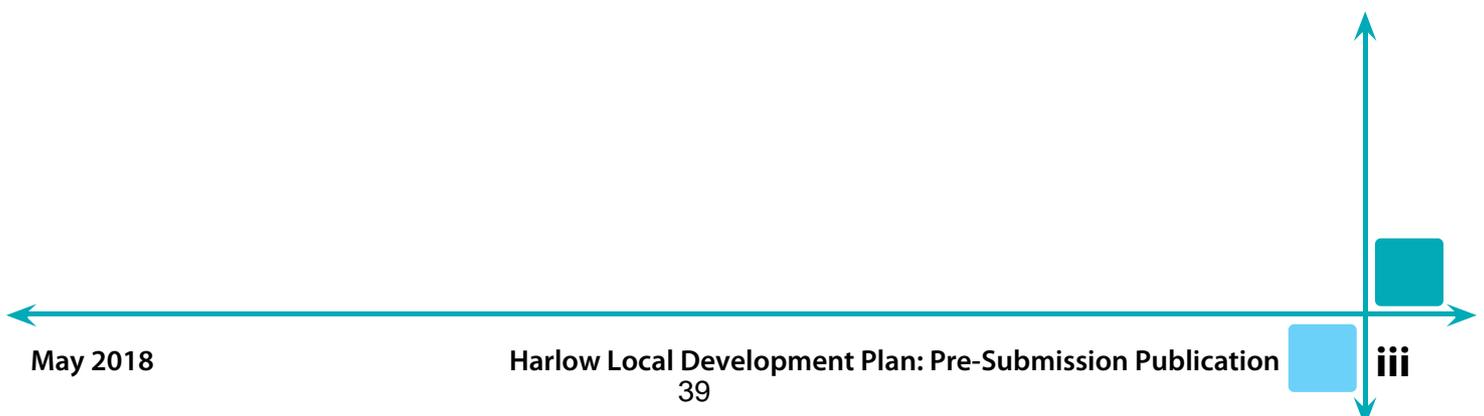
Previous consultations on the Local Plan have been considered throughout its preparation. More information on this can be found in Chapter 1.

Once adopted, the Local Plan will replace the Adopted Replacement Harlow Local Plan which was adopted in 2006.

How can I get more information?

You can contact Forward Planning at Harlow Council by phoning (01279) 446 897 or by emailing myharlow@harlow.gov.uk.

This document and the Publication process have been prepared under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and is compliant with the Council's Statement of Community Involvement (SCI).

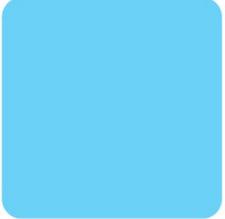


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CONTEXT, VISION AND OBJECTIVES

1. Introduction



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CONTEXT, VISION AND OBJECTIVES

1. INTRODUCTION

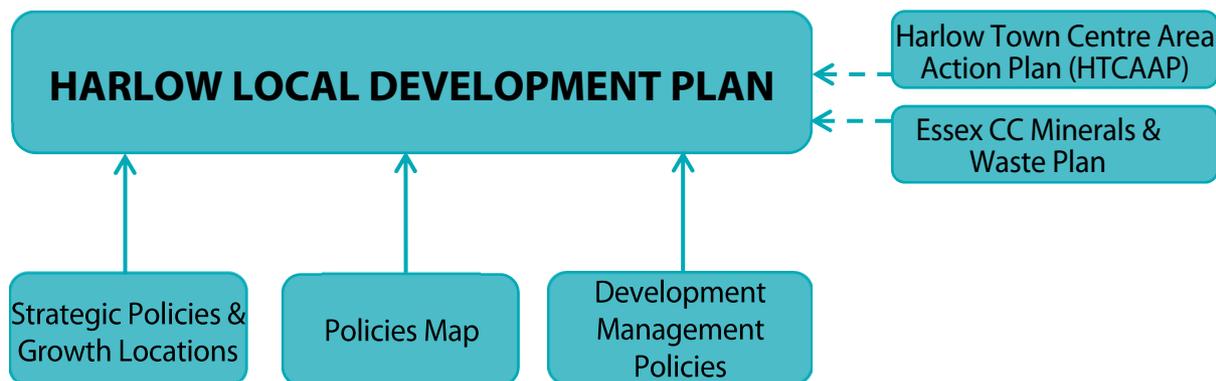
- 1.1 The Harlow Local Development Plan (known as the 'Local Plan' for brevity) sets out the long-term planning vision for the district and aims to guide future development across Harlow during the Local Plan period². The Local Plan ensures that development in the district is sustainable and meets the needs of residents, businesses and visitors to the area. Once it has been found sound and subsequently adopted, the new Local Plan will supersede the Adopted Replacement Harlow Local Plan (2006) and will become the basis upon which planning applications are determined³.
- 1.2 The Local Plan is underpinned by a number of key Strategic Objectives. These are supported by policies in the Strategic Growth Strategies, which provide an overarching planning framework and set out the district's development needs, together with Development Management policies. A Policies Map accompanies the Local Plan, which illustrates the policy themes, areas where existing land uses will be protected and areas for growth and regeneration. The Local Plan must be read as a whole and alongside national policies. 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.
- 1.3 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) and Planning Practice Guidance.
- 1.4 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.
- 1.5 The components of the Local Plan are illustrated in Fig. 1.1.

Footnotes:

² The Local Plan Period is 1 April 2011 to 31 March 2033.

³ 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.

Fig. 1.1: Components of the Harlow Local Development Plan

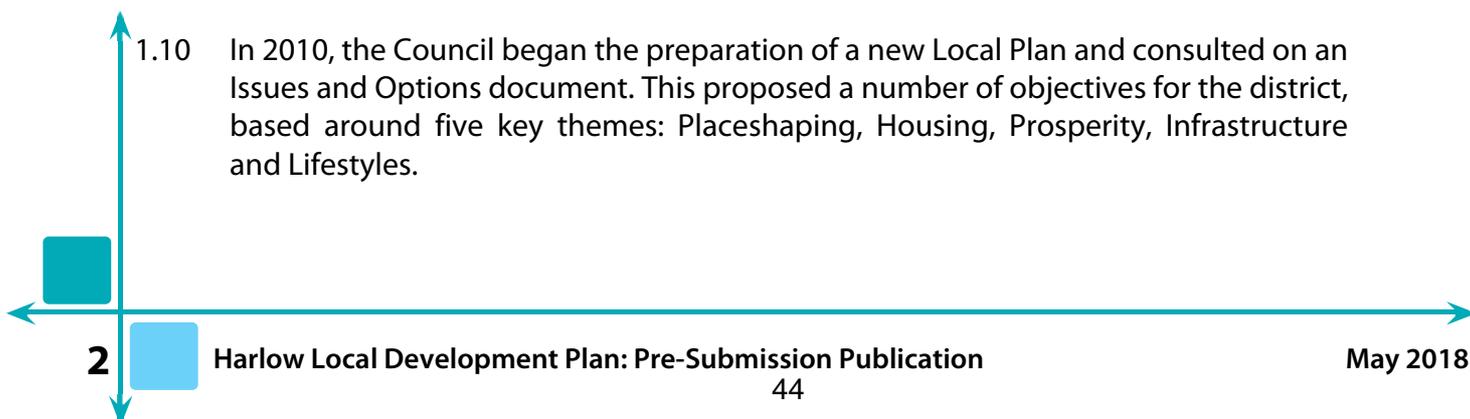


- 1.6 Once adopted, the Local Plan will replace the Adopted Replacement Harlow Local Plan (2006). It will be kept under review in response to changes in local needs and conditions and national policies. Its effectiveness will be monitored over time against a set of indicators.
- 1.7 The Local Plan will be examined by an independent Inspector to assess whether it has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound. According to national policies, a Local Plan is considered sound if it meets four tests:
- **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;
 - **2. Is it justified?** It should be the most appropriate strategy, when considered against the reasonable alternatives, based upon proportionate evidence
 - **3. Is it effective?** It should be deliverable over the Local Plan period and based upon effective joint working on cross-boundary strategic priorities
 - **4. Is it consistent with national policy?** It should enable the delivery of sustainable development in accordance with national policies.
- 1.8 In the production of the Local Plan, consideration has been 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)

- 1.9 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.
- 1.10 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.



- 1.11 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)

Option A RSS: Northern Led	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
Option B Policy-led	Disbursed growth, evenly distributed around the edges of Harlow, thereby taking into consideration all alternatives
Option C Combined criteria-led	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
Option D Regeneration-led	Maximising regeneration potential, this option allocated growth to the north, east and south, with very little development to the west
Option E Sustainable transport-led	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

- 1.12 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.
- 1.13 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)

- 1.14 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.

1.15 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)

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

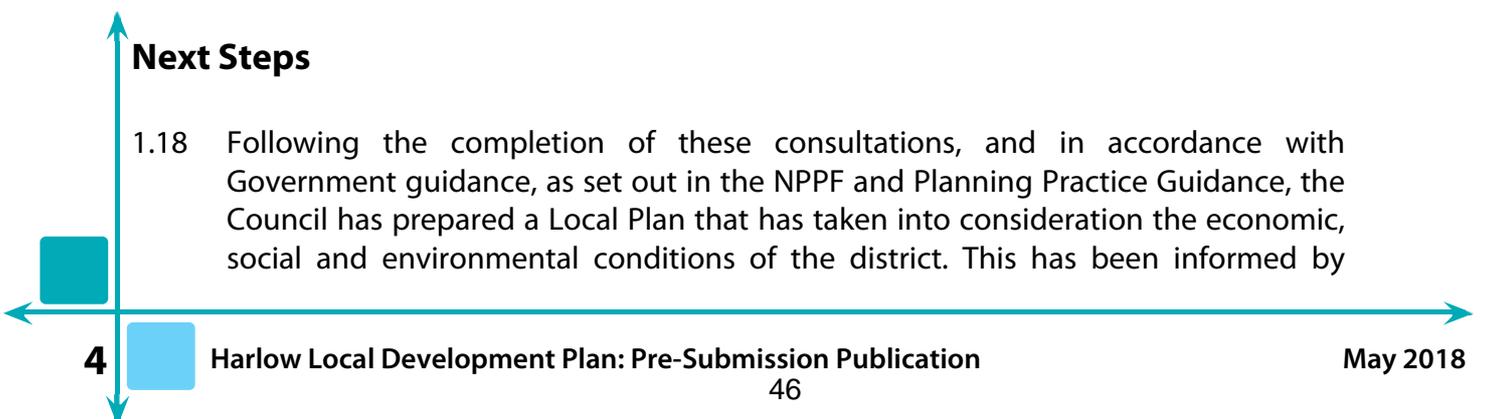
1.16 Respondents to the consultation identified the need for Harlow to provide for high levels of growth in order to tackle existing issues around affordability, infrastructure provision, regeneration needs and investment opportunities. Respondents also recognised the need for the Council to work closely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

Development Management Policies Consultation (2017)

1.17 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.

Next Steps

1.18 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.

The Policies Map

- 1.19 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

- 1.20 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.
- 1.21 The Policies Map also indicates the boundaries and locations of Harlow's heritage assets and historic environment, including Conservation Areas, listed buildings, Scheduled Monuments and areas of archaeological value.
- 1.22 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

- 1.23 Housing allocations, including the Strategic Housing Site East of Harlow (a new Garden Community), are shown 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 master planning 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

- 1.24 The Policies Map outlines the hierarchy of retail centres across the district including Neighbourhood Centres and the Hatches. It should be noted that a separate Area Action Plan is being prepared for Harlow Town Centre that will be accompanied by a detailed inset map, which will show major regeneration areas in the town centre, as well as primary and secondary frontages.

Lifestyles

- 1.25 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.

Infrastructure

- 1.26 Where appropriate and where specific details are known at the time of publication, the location of the key infrastructure needed to support development will be shown on the Policies Map.

Evidence Base

- 1.27 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

Sustainability Appraisal and other supporting documents

- 1.28 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. This is also subject to consultation and can be found on the Council's website. In addition a Habitats Regulation Assessment and Equalities Impact Assessment have been undertaken.

Duty to Co-operate

- 1.29 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.
- 1.30 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 appraises all of the development sites around Harlow.
- 1.31 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. 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 integrity of the SAC.

- 1.32 A MoU has also been prepared with East Hertfordshire, Epping Forest and Uttlesford District Councils which sets out the distribution of Objectively Assessing Housing Need across the area. The MoUs are available to view on the Council's website.
- 1.33 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 IDP.

Harlow and Gilston Garden Town

- 1.34 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.
- 1.35 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

- 1.36 Upon receipt of a valid planning application, the proposed development will be assessed on the relevant Strategic policies and Development Management policies in the Local Plan. The Minerals Local Plan and the Replacement Waste Local Plan prepared by Essex County Council and Southend-on-Sea Borough Council are the relevant Local Development Plans in respect of minerals and waste matters in the district. The Harlow Local Plan does not duplicate the Minerals Plan or Waste Plan. The policies in this document do not repeat national guidance or policy. Therefore, where a local policy is absent or silent, it is because adequate national policies exist.
- 1.37 Supplementary Planning Documents (SPDs) support and provide more detail to certain policies, such as the Council's Design Guide, which may be a material consideration in the assessment of planning applications.
- 1.38 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 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.

- 1.39 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.
- 1.40 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.
- 1.41 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.
- 1.42 The Council will monitor and review policies in order to assess their performance in relation to meeting the Council's Core Priorities. They will be reviewed in the Council's Authority Monitoring Reports (AMRs).



CONTEXT, VISION AND OBJECTIVES
2. Spatial Context



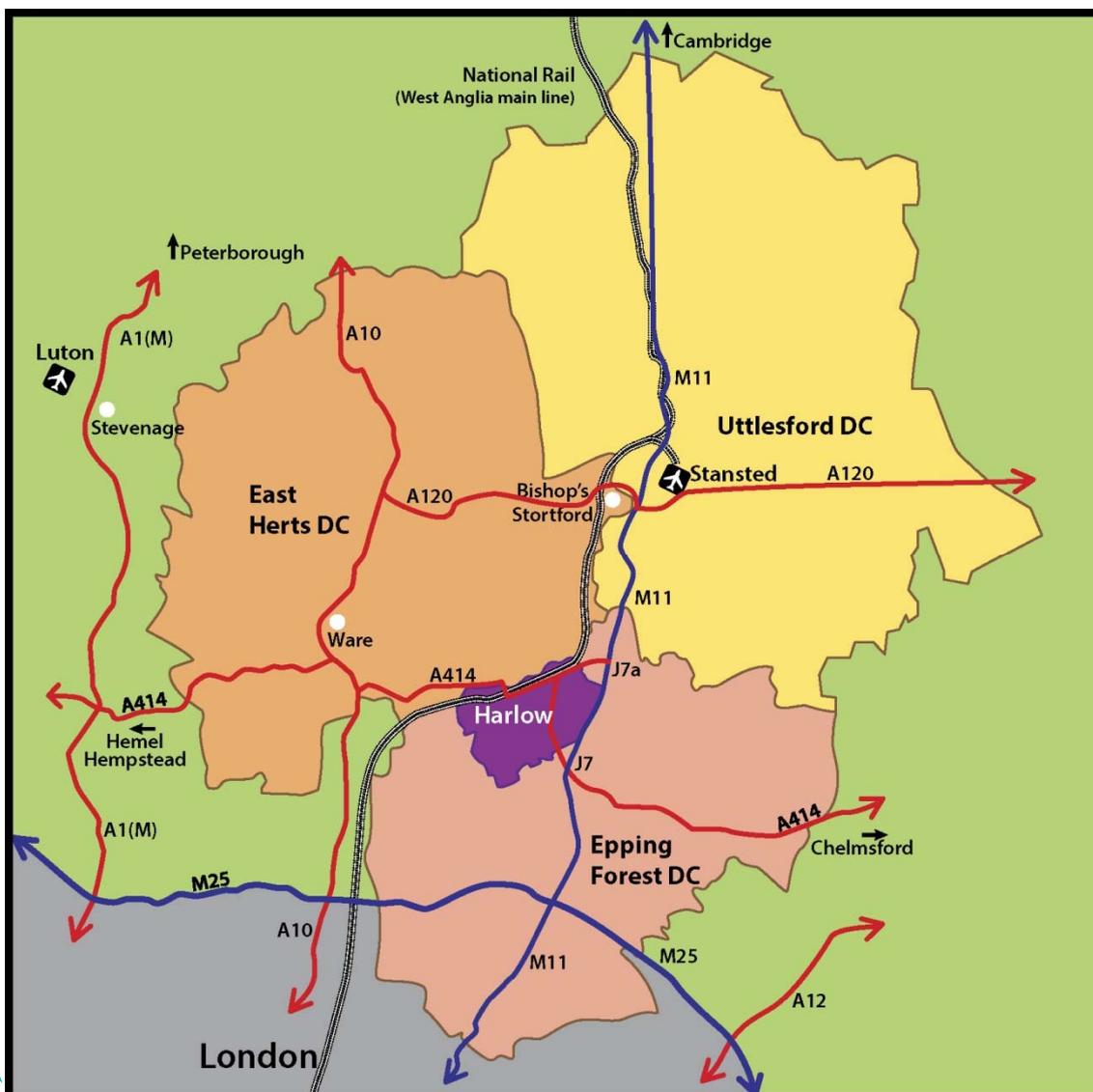
Harlow Local Development Plan

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 It 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 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 residents⁴. The district first reached its original target population of around 80,000 people in the mid-1970s⁵, but this was subsequently followed by a period of population decline. In 1995, Harlow’s population fell to 73,600 people⁴, 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.

Footnotes:

⁴ Source: Office for National Statistics, 2015 Mid-Year Estimates.

⁵ Source: Gibberd, F., et al., 1980. *HARLOW: The Story of a New Town*. Stevenage: Publications for Companies.

- 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.⁶ 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 averages⁴. The district has a higher than average number of lone parent households⁷ and higher overcrowding levels compared to the rest of Essex and England⁸. Smoking and obesity levels in Harlow are higher than average, with physical activity rates lower than average⁹.
- 2.13 Deprivation levels in the district are overall lower than the England average but high compared to most parts of Essex.¹⁰ There are some variances between different parts of Harlow, with the east being less deprived than areas to the west and south.

Housing and Affordability

- 2.14 There are over 35,800 dwellings in the district and 34,700 households⁶. 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 Uttlesford¹¹. 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 Uttlesford¹¹. The need in Harlow equates to around 3,400 new affordable dwellings over the Local Plan period.

Footnotes:

⁶ Source: Office for National Statistics, *2011 Census*.

⁷ Source: Office for National Statistics, *2015 Households and Families*.

⁸ Source: Office for National Statistics, *2011 Census Analysis*.

⁹ Source: Public Health England, *2015 Health Profile for Harlow*.

¹⁰ Source: Ministry for Housing, Communities and Local Government, *2015 English Indices of Deprivation*.

¹¹ Source: ORS, 2017. *West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update July 2017*.

- 2.17 The Council has been working with selected partners to bring forward Priority Estate 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 in the last five years. 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 Harlow¹². 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 country¹².
- 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 medical technology and other high tech companies. It has also been identified as an opportunity site by the London Stansted Cambridge Consortium (LSCC).

Footnotes:

¹² Source: Office for National Statistics, 2015. *NOMIS – Official Labour Market Statistics*.

- 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 running through Green Wedges 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. Planning consent has been granted for a new Junction 7a on the M11 to the north-east of the district to 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 in and out of Harlow and not just within; to increase the provision of Sunday services; and to improve journey times for buses by decreasing congestion on Harlow's roads.
- 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 would be by sustainable modes of transport. Sustainable transport matters (including walking, cycling and public transport) are, therefore, important for the successful future growth of Harlow.

Green Infrastructure and the Natural Environment

- 2.35 Green Infrastructure is multi-functional urban and rural green space, including parks, playing fields, woodlands, allotments and wildlife corridors. 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 countryside.

- 2.36 The Green Belt, previously 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.

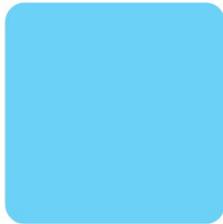
Historic Environment

- 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 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:
- Provide affordable and flexible housing for future population needs
 - Provide the critical mass needed to regenerate retail centres and other facilities
 - Provide attractive new homes for the workforce needed to retain and expand Harlow businesses
 - 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 the City of 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, managed and phased appropriately, will help to provide the investment needed to deliver infrastructure requirements including improvements to 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 change is required in the population of Harlow in order to deliver the enhancements needed to ensure Harlow is a sustainable 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 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 2017

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 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 and mitigate and adapt to the effects of climate change. 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

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

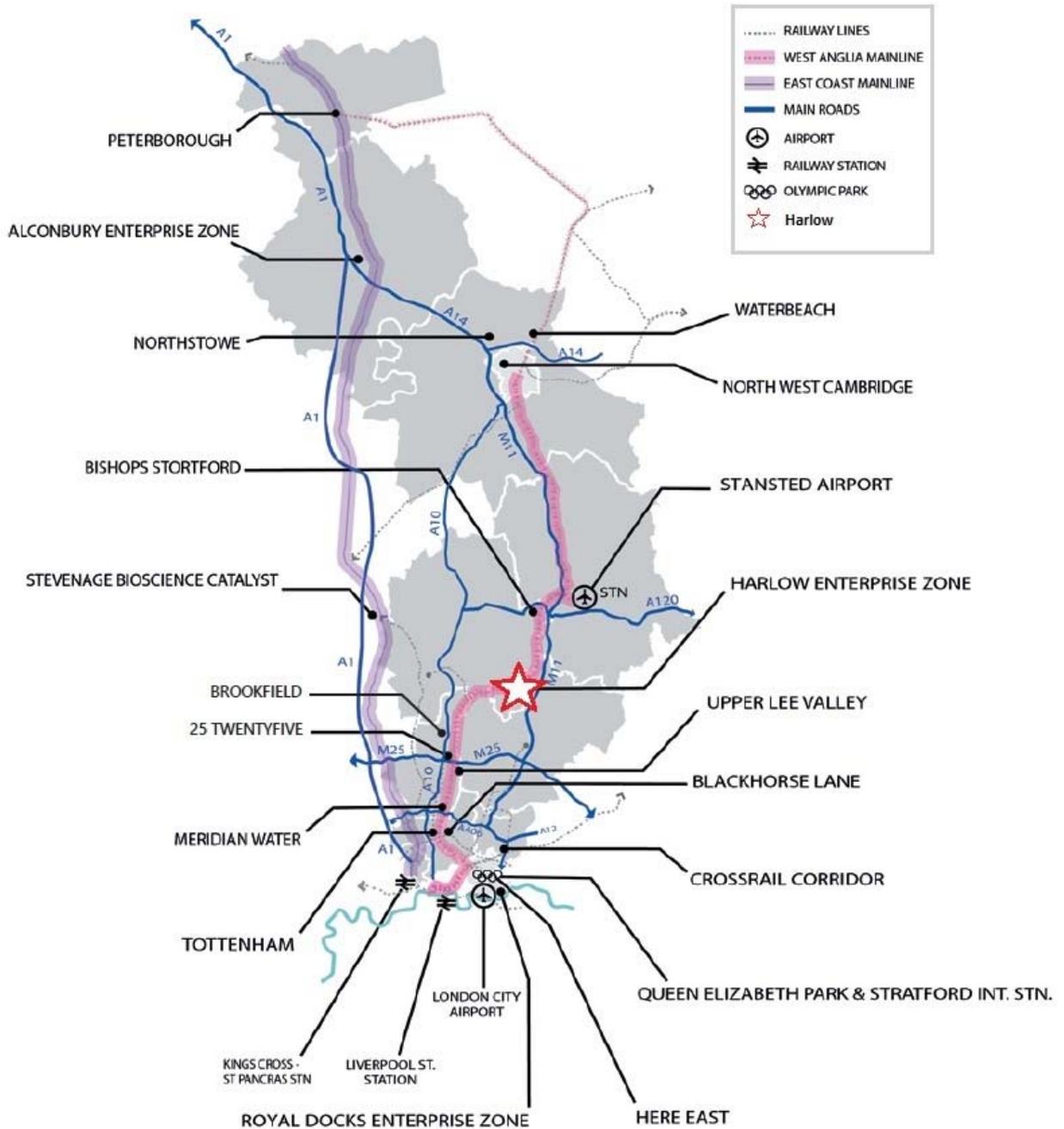
Fig. 3.3: Local Plan Strategic Objectives

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

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. 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.

Fig. 3.4: London – Stansted – Cambridge Corridor



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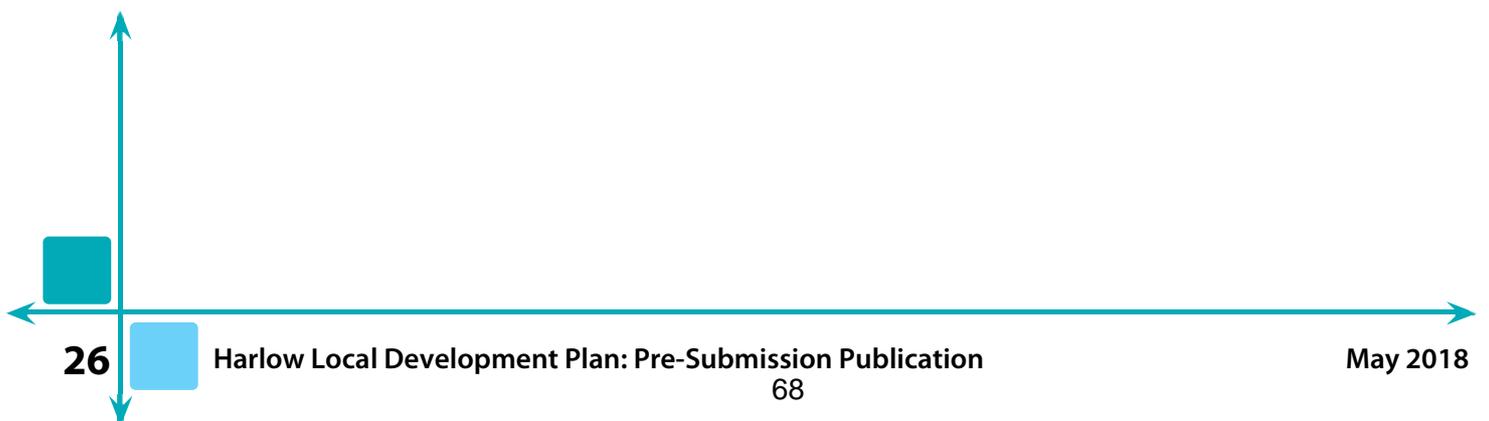
Fig. 3.5: Vision for the LSCC Core Area

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.





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:
- to protect and enhance the important parts of Harlow which offer residents a good quality of life; and
 - to proactively change areas within Harlow through new development to improve living standards for existing and future residents; and
 - to bring forward substantial growth to sustain Harlow as a sub-regional centre.
- 4.2 The Strategy identifies:
- the strategic development sites and wider growth aspirations for the Harlow area;
 - the number of new homes to be built;
 - where new jobs will be created;
 - what new retail provision will be made;
 - how the district will grow and develop to become a more desirable, sustainable and prosperous place to live, visit, work and invest in; and
 - 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:
- the Strategic policies in the Strategic Growth Strategy;
 - the Development Management policies; and
 - 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. 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:
- the provision of neighbourhoods positioned around Neighbourhood Centres;
 - an appreciation of local character and landscape setting;
 - the retail hierarchy of the Town Centre, Neighbourhood Centres and Hatches;
 - the separation of employment uses from residential areas;
 - a network of Green Wedges which dissect the built form; and
 - schools and community facilities within walking distance.

- 4.7 New development must also have regard to the Council's Design Guide and the Harlow and Gilston Garden Town Spatial Vision and Design Charter. 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, registered parks/gardens and areas of architectural significance, will be conserved, protected and managed.
- 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 district will provide 9,200 dwellings over the Local Plan period, with the intention that at least 30% of these will be for affordable housing. 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 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 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 master planning of the communities in accordance with the Spatial Vision and Design Charter for the Garden Town.

- 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 floorspace is required over the Local Plan period. The district's main 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.

- 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. 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.

- 4.17 To achieve economic prosperity and regeneration, the Local Plan will support training and other educational opportunities within the district.

- 4.18 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 be prepared to guide the redevelopment of the town centre with growth concentrated around the northern and eastern parts of the centre.

- 4.19 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

- 4.20 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 and community halls which will help reduce deprivation levels and promote healthy and active lifestyles.
- 4.21 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.
- 4.22 The new Garden 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.
- 4.23 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.

Infrastructure

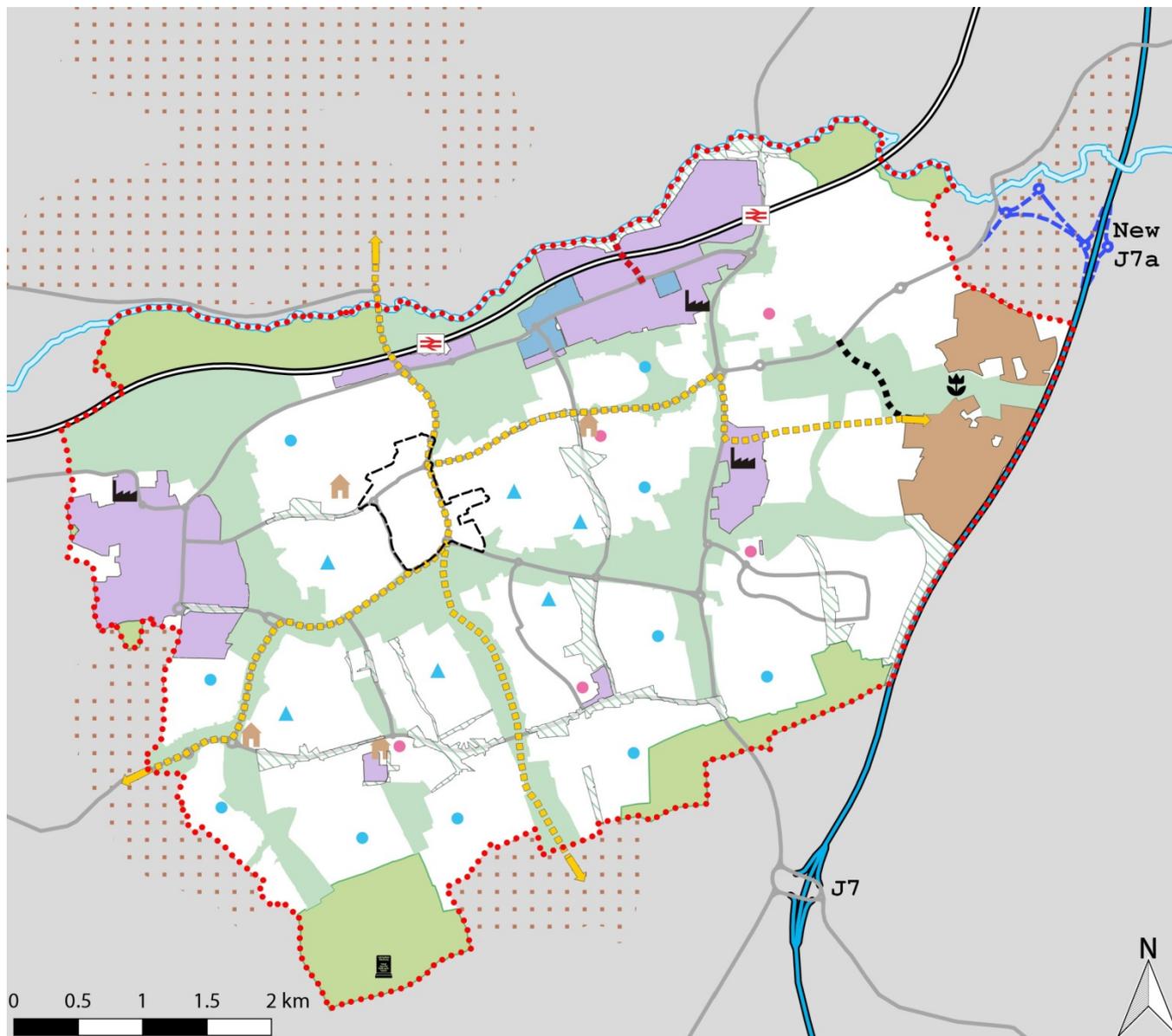
- 4.24 The Spatial Development Strategy will be underpinned by the necessary supporting infrastructure, with development phased over the Local Plan period to ensure that the correct levels of infrastructure are provided.
- 4.25 In order to help promote Harlow as a growth location along the M11 corridor, 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 and to the 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.
- 4.26 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.
- 4.27 The Local Plan will also 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.

- 4.28 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.

Key Diagram

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

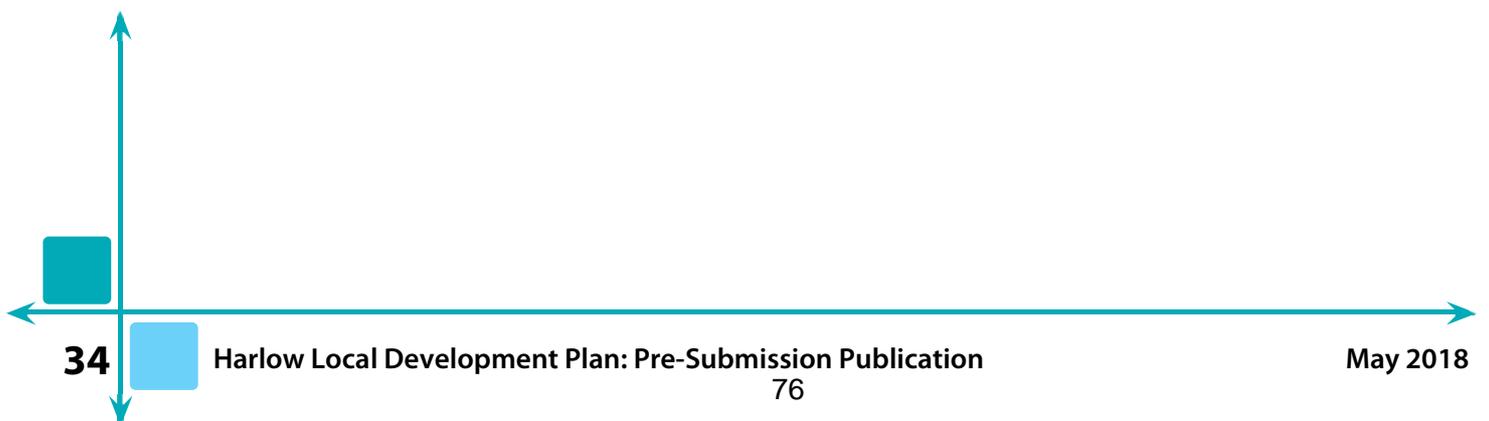
Fig. 4.1: Key Diagram



Legend

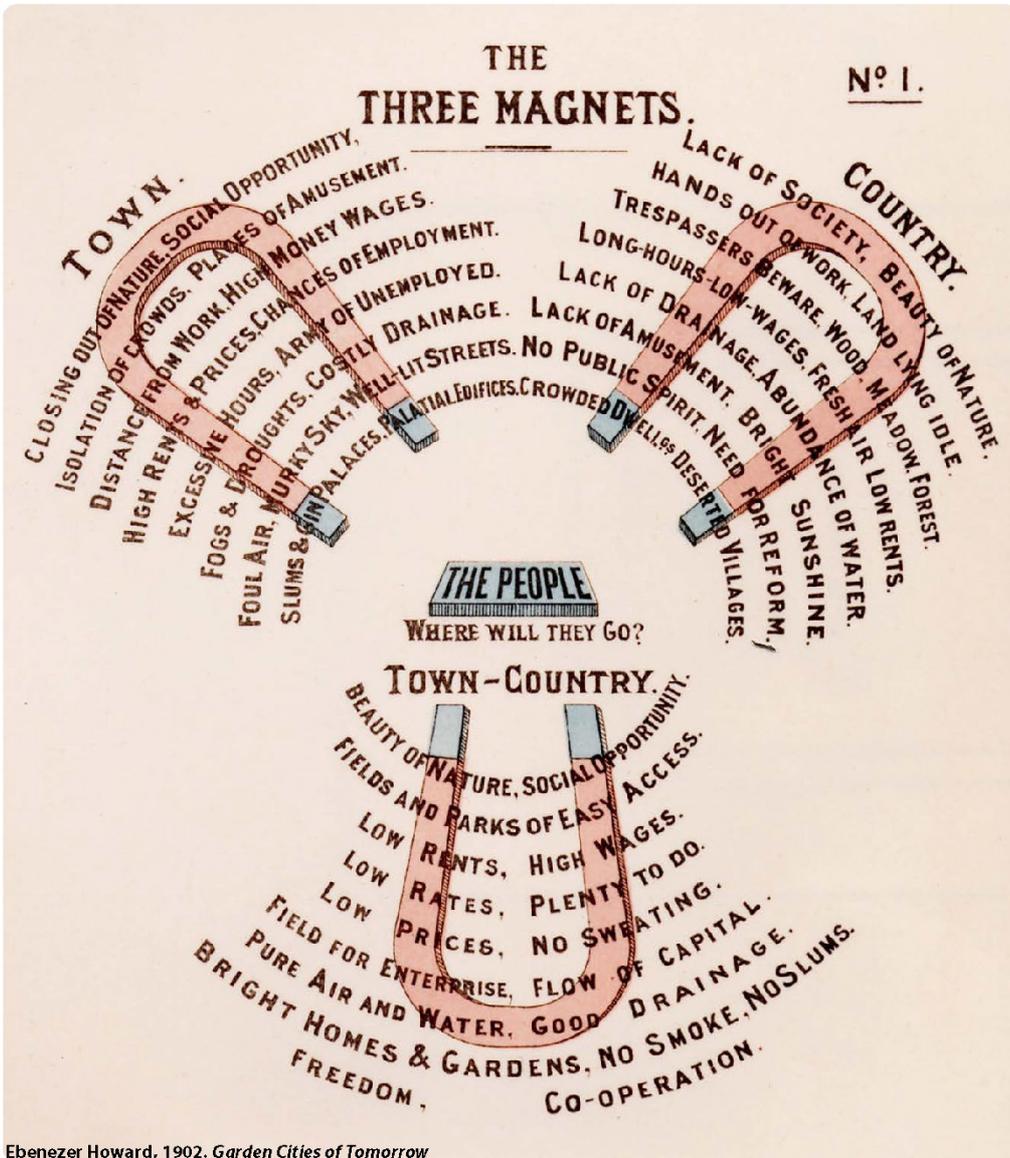
- Green Wedge
- Green Finger
- Green Belt
- Area covered by Town Centre Area Action Plan
- Neighbourhood Centre
- Hatch
- Hatch identified for mixed use regeneration
- Retail Warehouse Area
- Employment land
- New employment land
- Indicative new Stort Crossing
- Indicative new Sustainable Transport Corridor linking to the Garden Communities
- Indicative new access for East of Harlow Strategic Housing Site
- New route from Junction 7a to Harlow
- New allotment
- Cemetery expansion
- Allocated housing site (only sites above 40 dwellings shown on Key Diagram)
- New Garden Communities:
 - Strategic Housing Site East of Harlow
 - Sites outside Harlow
- Railway station
- M11
- Major road
- Railway
- River Stort
- District boundary

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STRATEGIC GROWTH STRATEGY FOR THE HARLOW AREA

5. Harlow and Gilston Garden Town



Ebenezer Howard, 1902. Garden Cities of Tomorrow

STRATEGIC GROWTH STRATEGY FOR THE HARLOW AREA

5. 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 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.
- 5.3 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.
- 5.4 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.
- 5.5 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

5.6 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

5.7 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 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 - To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**
- **Objective 12 - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities**
- **Objective 13 - Reduce the need to travel by vehicle by ensuring new development is sustainably located or accessible by sustainable modes of transport**
- **Objective 14 - Improve transport links, particularly for sustainable modes of transport, to community facilities**

HGT1 Development and Delivery of Garden Town

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 Epping Forest District);
 - (b) **West of Harlow (Water Lane Area)** – delivering approximately 2,100 dwellings over the Local Plan period (within 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 Harlow District);
 - (d) **Gilston Area** - delivering approximately 3,000 dwellings over the Local Plan period with a further 7,000 dwellings beyond the Plan period (within East Hertfordshire District).

2. The design, development and phased delivery of each Garden Town Community must 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 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 for each of the Garden Town Communities in accordance with the Harlow and Gilston Garden Town Spatial Vision and Design Charter 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 the 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 of the new Garden Town Communities, 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 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) Develop 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 and the natural and historic landscapes and systems, Green Infrastructure and biodiversity;
- (m) Ensure mitigation from and adaptation to climate change is secured through design and construction methods; and
- (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.

Justification

- 5.8 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.

- 5.9 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.
- 5.10 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.
- 5.11 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.
- 5.12 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.
- 5.13 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

- 5.14 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.
- 5.15 To facilitate the delivery of the new Garden Town Communities based on Garden City principles, the Councils have prepared a Spatial Vision and Design Charter to provide an overarching spatial vision across each Community and a design charter 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

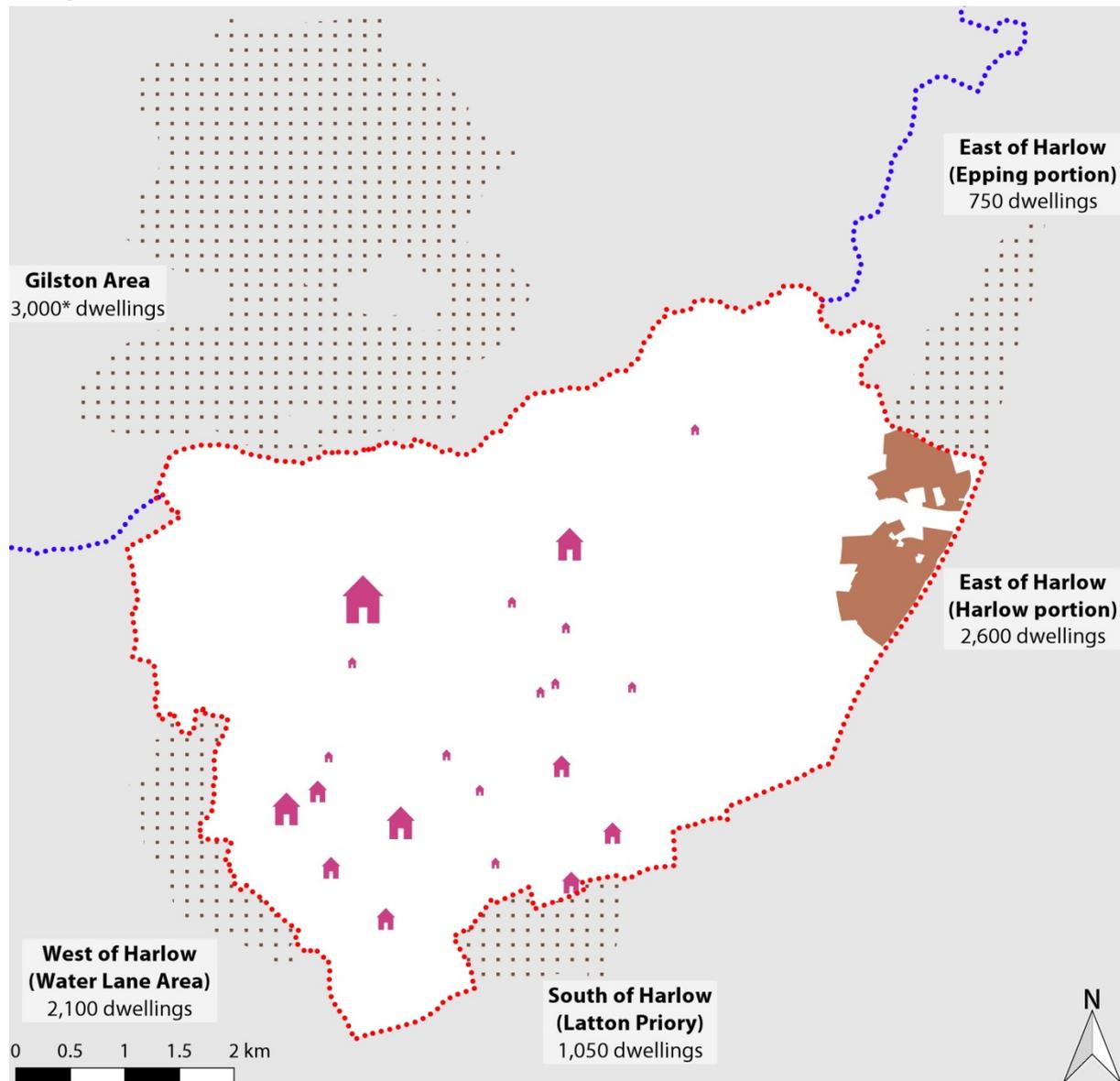
Garden Town and ensure that exceptional quality standards are achieved through new development, as developers must submit their proposals for assessment before pre-application.

- 5.16 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 towards 60% by sustainable modes of transport.
- 5.17 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.
- 5.18 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.
- 5.19 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.
- 5.20 Each site will need to be delivered in accordance with the overall Garden Town programme, requiring a co-ordinated approach across the 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.
- 5.21 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.

The Councils will seek to adopt the Strategic Master Plans as Supplementary Planning Documents (SPDs).

- 5.22 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 Plan prior to finalisation. Strategic Master Plans must be prepared in a form and manner which means that they are capable of adoption as SPDs.
- 5.23 To maintain the Green Infrastructure, public realm and community assets identified in the 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.
- 5.24 The Garden 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 also provide opportunities to promote high environmental standards in terms of energy efficiency, design and low-carbon technologies, and set an example for future major development.
- 5.25 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.
- 5.26 The components of the Harlow and Gilston Garden Town are mapped in Fig. 5.1.

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



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.

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Strategic Housing Site East of Harlow - New Garden Community

- 5.27 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, a two-form entry primary school and appropriate contributions (including the provision of land) 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.
- 5.28 Highway and transport improvements, reflecting the outcomes of the Sustainable Transport Corridor Study, are also required. These include works to widen the B183 Gildea 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. In addition to Epping Forest's access requirement, Harlow will require the provision of an additional access road to the south unless it can be shown that a third access is not required. Satisfactory water supply and waste water network infrastructure is also required.

South of Harlow (Latton Priory) - New Garden Community

- 5.29 Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new two-form entry 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.
- 5.30 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.
- 5.31 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 Community

- 5.32 Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new two-form entry 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.
- 5.33 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.

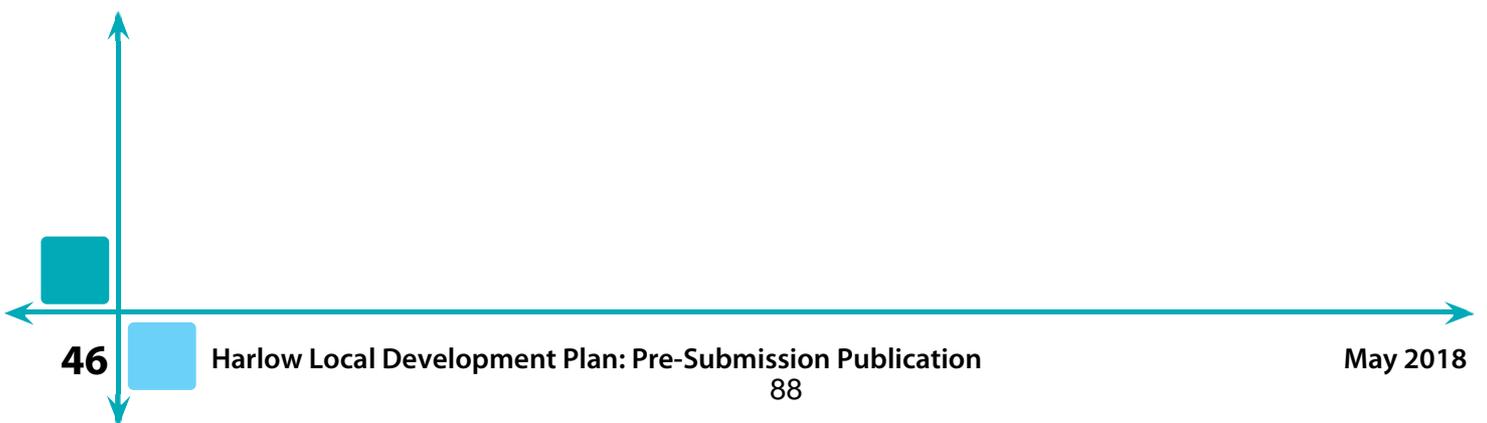
- 5.34 As the Harlow West development will be adjacent to existing Harlow community facilities, opportunities to replace or improve or extend the primary school, health centre, sports centre, playing fields and recreation facilities should be considered to support the regeneration of this area.

Gilston Area – New Garden Community

- 5.35 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.
- 5.36 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.
- 5.37 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

- 5.38 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, 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 Princess Alexandra Hospital is considered to play an important role in this.
- 5.39 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.





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 policies 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 policies 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 13 - Reduce the need to travel by vehicle by ensuring new development is sustainably located or accessible by sustainable 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, it will normally be supported, unless material considerations indicate otherwise and/or either of the following apply:

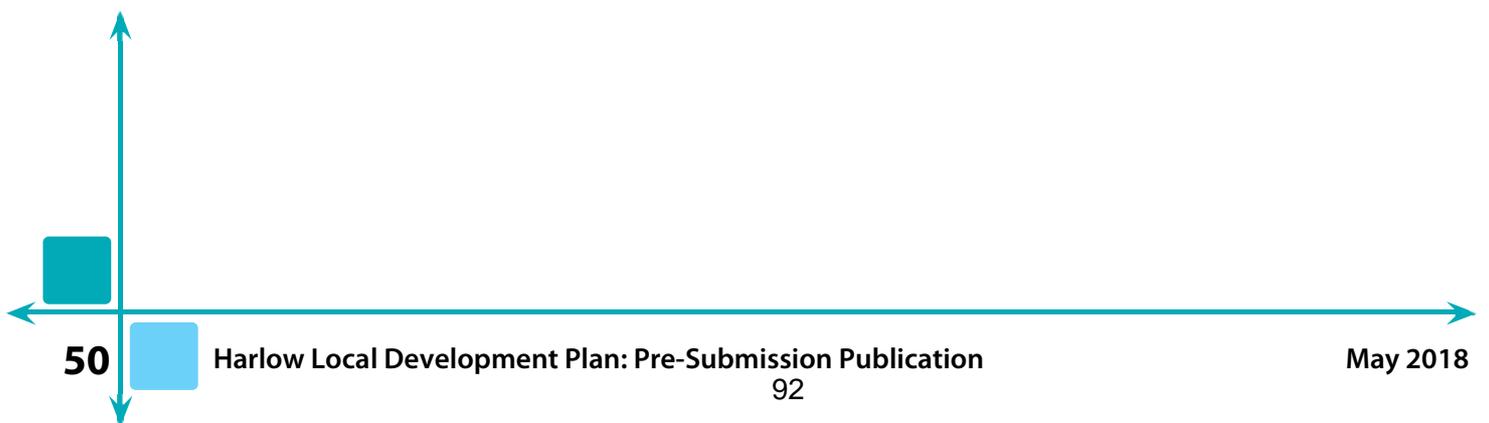
- (a) any adverse impacts arising from the development would significantly and demonstrably outweigh the benefits, when assessed on national planning policies;
- (b) specific national policies indicate that the development should be restricted.

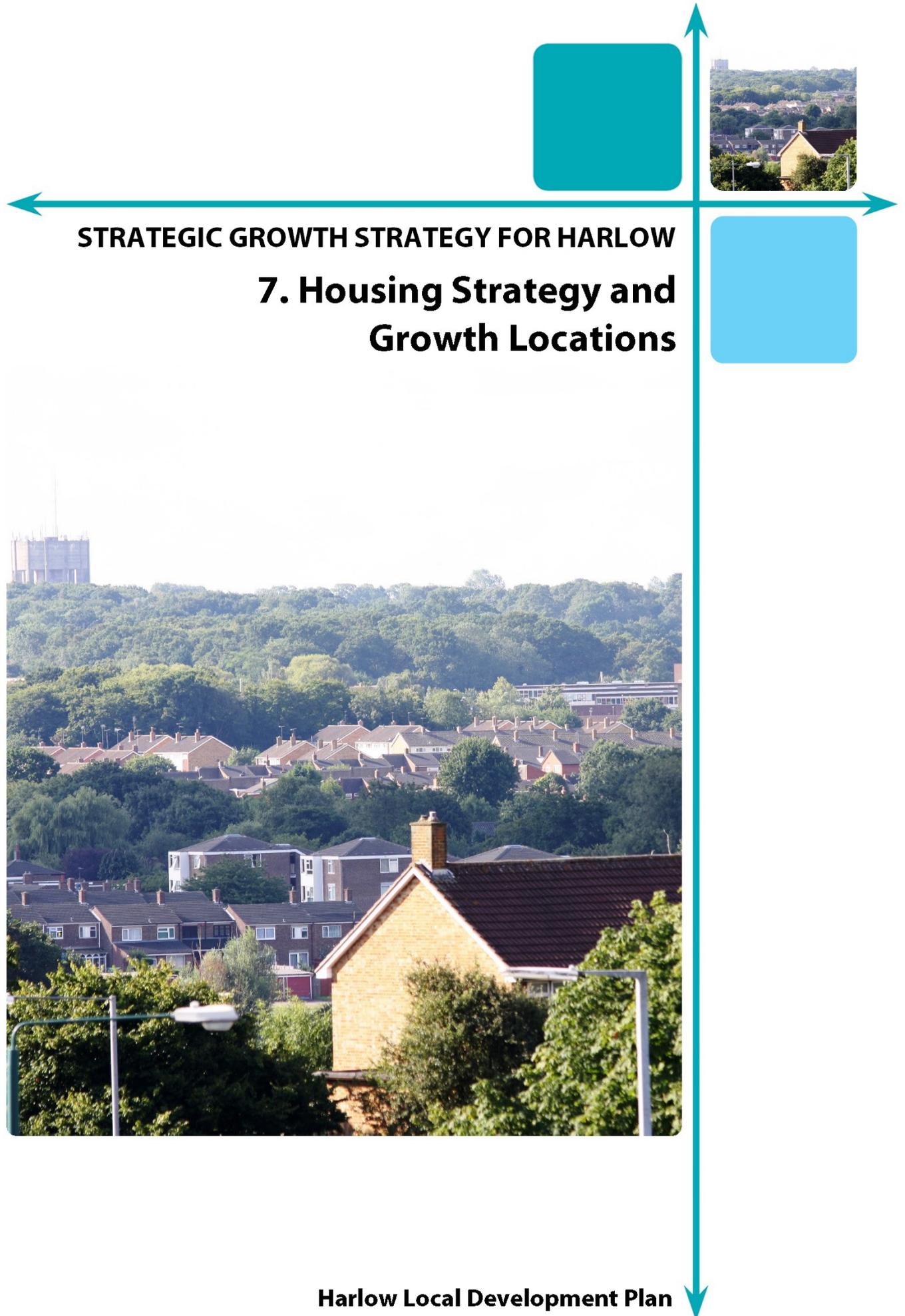
Justification

- 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.





STRATEGIC GROWTH STRATEGY FOR HARLOW

7. Housing Strategy and Growth Locations



Harlow Local Development Plan

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 Spatial Vision and Design Charter.
- 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 and to provide the critical mass for regeneration and urban renewal, 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**

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).

Justification

- 7.6 The Local Plan must ensure there is a sufficient supply of market, affordable and specialist dwellings to meet Harlow's **Objectively Assessed Housing Need (OAHN) of 7,400 dwellings**. To contribute to affordable housing need and regeneration, an additional 1,800 dwellings are provided giving a **total of 9,200 dwellings**. 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**, as shown in Fig. 7.1.

Fig. 7.1: Dwelling supply

Completions at 31 March 2017	1,436
Commitments at 31 March 2017	4,122
Strategic Housing Site East of Harlow	2,600
Additional requirement	1,042
TOTAL SUPPLY 9,200	

- 7.7 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.
- 7.8 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 Housing Market Area (HMA).
- 7.9 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)

7.10 The assessment of housing need and the Council's housing strategy in the Local Plan reflects the principles set out in national 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)

7.11 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)

7.12 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

7.13 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.

7.14 The September 2015 SHMA indicated a need for 46,100 dwellings in the HMA. For Harlow, the OAHN is 5,900 dwellings, including 3,400 affordable dwellings.

7.15 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.

7.16 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. Currently the study does not differentiate the total to individual Councils as the ONS has not finalised the methodology.

7.17 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.

7.18 The number of dwellings apportioned to Harlow is 7,409 which equates to 337 dwellings per annum over the Local Plan period. This figure is used as the basis for the OAHN in the Local Plan.

Harlow Strategic Site Assessment

- 7.19 The Strategic Site Assessment assesses the strategic housing requirements for the HMA in accordance with the provisions of the Duty to Co-operate.
- 7.20 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.
- 7.21 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.
- 7.22 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

- 7.23 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 regenerate Harlow. To achieve these, the housing requirement for Harlow has been set at 9,200 dwellings, which includes completions, commitments since 1 April 2011 and sites allocated in the Local Plan. The requirement is 1,800 above the OAHN identified in the 2017 SHMA to meet Harlow's affordable housing and regeneration needs, 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**

- 7.24 National planning policies require the Council to identify a supply of specific deliverable¹³ sites sufficient to provide five years' worth of housing¹⁴. In addition a

Footnotes:

¹³ 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 5 years

buffer of 5% or 20% should be added to the five year requirement if there has been an undersupply of dwellings in the past. Based on the 9,200 dwelling requirement annualised to 418 dwellings per annum, 2,509 dwellings should have been completed by March 2017. In reality there were 1,436 completions (239 dwellings per annum) achieved during this period, resulting in a shortfall of 1,073 dwellings on the requirement. 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).

- 7.25 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.
- 7.26 There have been 1,436 dwelling completions since the start of the Local Plan period (1 April 2011). There is planning permission for 4,122 dwellings (as at 31 March 2017) which contributes to the housing supply. The Local Plan is, therefore, required to allocate at least 3,700 dwellings. The housing trajectory (see Appendices) illustrates the expected rate of housing delivery for the Local Plan period.

Windfall Sites

- 7.27 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.
- 7.28 Windfall sites are generally sites which are either below the Call for Sites¹⁵ 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.
- 7.29 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.
- 7.30 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

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.

¹⁴ The responsibility for the delivery of housing lies with housebuilders and not the Council.

¹⁵ The Call for Sites is an invitation to developers to submit sites for assessment in the SHLAA.

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.

HS2 Housing Allocations

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	650
2	The Stow Service Bays	70
3	Land east of Katherines Way, west of Deer Park	69
4	Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery	42
5	South of Clifton Hatch	36
6	Riddings Lane	35
7	Kingsmoor Recreation Centre	35
8	The Evangelical Lutheran Church, Tawneys Road	35
9	Land east of 144-154 Fennells	23
10	Pollard Hatch plus garages and adjacent land	20
11	Land between Second Avenue and St. Andrews Meadow	16
12	Coppice Hatch and garages	16
13	Sherards House	15
14	Elm Hatch and public house	13
15	Playground west of 93 – 100 Jocelyns	12
16	Fishers Hatch	10
17	Slacksbury Hatch and associated garages	10
18	Garage blocks adjacent to Nicholls Tower	10
19	Stewards Farm	10
20	Land between Barn Mead and Five Acres	10
21	Pypers Hatch	10
	Total Dwellings Allocated	1,147

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

Justification

7.31 The Local Plan has identified a dwelling requirement of 9,200 during the Local Plan period. There have been 1,436 dwellings completed during the period of 1 April 2011 to 31 March 2017 and an additional 4,122 dwellings have planning permission. This leaves a residual requirement of 3,642 dwellings to be provided.

- 7.32 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 1,147 dwellings provide a total of 3,747 dwellings. This is 105 dwellings more than the residual requirement of 3,642. This overage provides an element of flexibility should some sites not come forward or their capacity is less than expected.

Implementation

- 7.33 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.
- 7.34 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 Master Plan based on the Garden Town Charter 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 Spatial Vision and Design Charter, including the provision of Green Wedges and Green Fingers (incorporating public open space) and opportunities to enhance the biodiversity of the area;
- (b) 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);
- (c) provide necessary infrastructure, including, but not limited to, health centres and education facilities, as set out in the Infrastructure Delivery Plan (IDP);
- (d) provide footpaths, cycleways and bridleways within the development and link them to the existing Harlow network;
- (e) provide indoor and outdoor sports facilities, which may be shared-use, neighbourhood equipped areas for play and locally equipped areas for play;

- (f) provide for appropriate local retail facilities, similar to Neighbourhood Centres (incorporating an element of employment use) and Hatches elsewhere in Harlow;
- (g) provide for appropriate community facilities as set out in the IDP such as allotment provision, youth services and libraries;
- (h) provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment; and
- (i) provide and contribute to public art within the development.

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 will be assessed on the Garden Town Charter.

Developers will be expected to contribute towards the strategic highway and other infrastructure requirements, proportionate with the impact that the development would have on them.

Justification

- 7.35 The Strategic Housing Site East of Harlow was identified as part of a joint study with the Housing Market Area (HMA) districts. The site forms part of one of the four new Harlow and Gilston Garden Town Garden Communities, and provides the opportunity to deliver regeneration objectives whilst also addressing housing needs.
- 7.36 The four Harlow and Gilston Garden Town Garden Communities are:
- South of Harlow (Latton Priory), within Epping Forest District;
 - West of Harlow (Water Lane Area), within Epping Forest District;
 - East of Harlow, partly within Harlow District and partly within Epping Forest District; and
 - Gilston Area, within East Hertfordshire District.
- 7.37 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.
- 7.38 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.
- 7.39 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.

- 7.40 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

- 7.41 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.
- 7.42 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.
- 7.43 Developers will be required to produce a master plan based on the Garden Town Charter 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.

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

- 7.44 National policy for traveller sites¹⁶ 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.

Footnotes:
¹⁶ August 2015

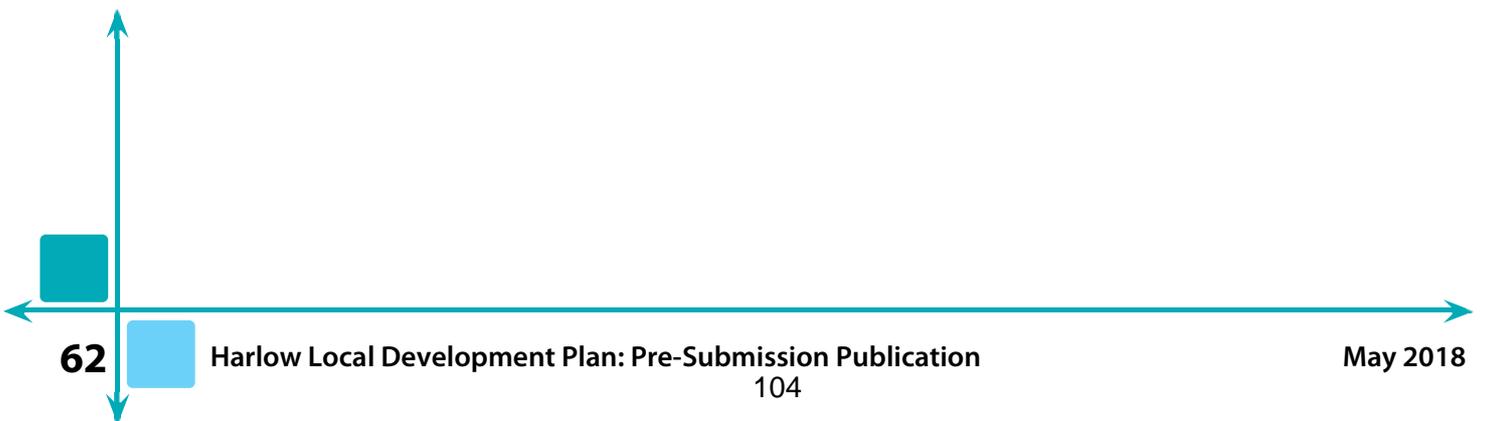
- 7.45 An assessment of needs for Gypsies, Travellers and Travelling Showpeople across Essex for individual districts was updated¹⁷ to take into account the national policy for traveller sites, including specifically a revised definition of a traveller. The key change that was made in this legislation 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.
- 7.46 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.
- 7.47 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).
- 7.48 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 requirement of two pitches. Consequently there is a future need of nine pitches in the district for the remainder of the Local Plan period.
- 7.49 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 through 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

- 7.50 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.
- 7.51 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.

Footnotes:

¹⁷ Essex, Southend-on-Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment





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 floorspace and supports the delivery of committed floorspace 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**

ED1 Future Employment Floorspace

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 uses will be delivered at Harlow Business Park at The Pinnacles and at the Harlow Enterprise Zone at London Road.

A further 2.2ha of land will be delivered for employment uses 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
	TOTAL EMPLOYMENT PROVISION	20ha

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 London¹⁸. 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 growth sectors.

Footnotes:

¹⁸ Source: Office for National Statistics, 2011 Census.

- 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 floorspace (B1) and 68ha of industrial floorspace (B2/B8) should be planned for during the period of 2016 to 2033.
- 8.11 For Harlow, the document identified the need to plan for a further 2 to 4ha of office floorspace (B1) and 16ha of industrial floorspace (B2/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 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 Floorspace

Existing strategic employment sites at The Pinnacles, Templefields and London Road will be retained and enhanced for a mix of office, industrial and warehouse uses and other associated activities.

Grow-on space will be supported on existing allocated employment sites and on future employment sites identified at The Pinnacles (ED01) and Templefields (ED03).

Neighbourhood Service Areas will be protected and the provision of smaller start-up units, shared spaces and workhubs in these areas will be encouraged.

Existing employment sites and Neighbourhood Service Areas are identified on the Policies Map.

Justification

- 8.16 The district's existing employment areas at Templefields, London Road and The Pinnacles 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.
- 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 average¹⁹.

Footnotes:

¹⁹ Source: Office for National Statistics, 2015. NOMIS –Official Labour Market Statistics.

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 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.

Implementation

- 8.18 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.
- 8.19 The Council has agreed to prepare an Article 4 Direction for parts of the Enterprise Zone at London Road South and Templefields in order to protect employment uses from conversion. Further Directions will be considered for the remaining employment areas.

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

- 8.20 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.
- 8.21 The Skills Strategy will ensure that economic prosperity in Harlow's businesses translates to local residents and the local community.

Implementation

- 8.22 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.

- 8.23 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.
- 8.24 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.

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

- 8.25 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.
- 8.26 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

- 8.27 The 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.
- 8.28 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.

- 8.29 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**

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
TOP  BOTTOM	Town Centre	Harlow Town Centre
	Neighbourhood Centres	Bush Fair The Stow Old Harlow Church Langley Staple Tye
	Hatches	Burgoyne Maunds Crawley Mill Clifton Prentice Place Colt Pollards Coppice Pypers Elm Sherards Fishers Slacksbury Katherines Sumners Manor Ward
	Out-of-Centre Retail Parks (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:

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

Development opportunities and improvement schemes identified in The Stow, reference RS3-01 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. The Strategic policies list

strategic housing allocations including Hatches identified for mixed used redevelopment. These Hatches are listed in Fig. 9.1 and on the Policies Map.

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

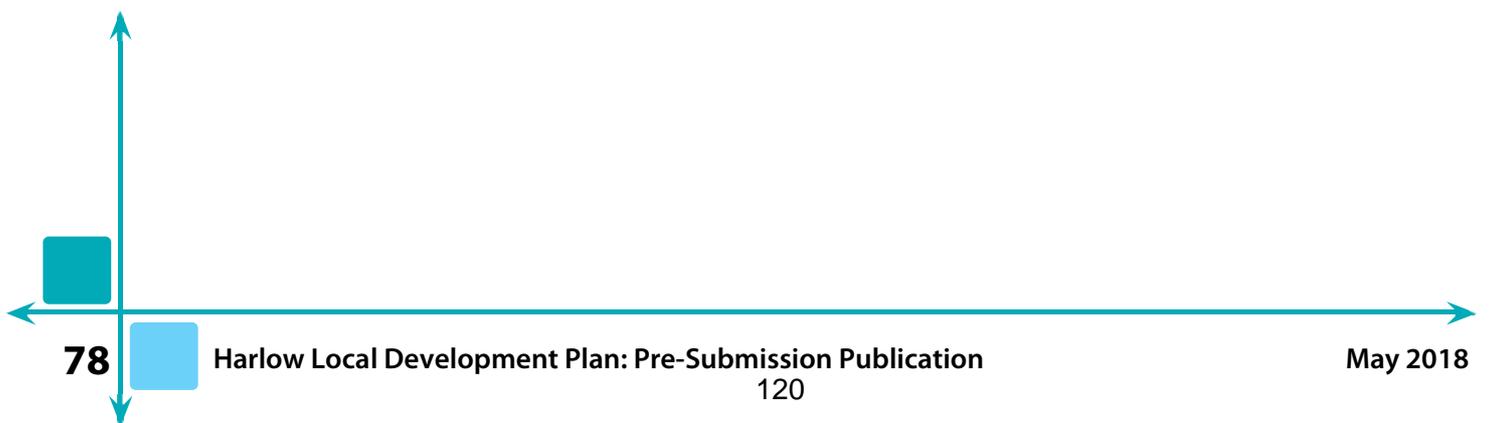
REF.	LOCATION	DWELLINGS CAPACITY
10	Pollard Hatch plus garages and adjacent land	20
12	Coppice Hatch and garages	16
14	Elm Hatch and public house	13
16	Fishers Hatch	10
17	Slacksbury Hatch and associated garages	10
21	Pypers Hatch	10

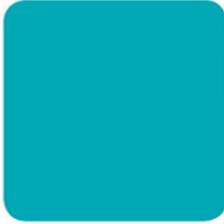
9.20 The district’s Retail Parks are an important retail destination for a wide catchment area and provide large units for bulky A1 goods such as furniture and electrical items. Protecting the unique role and function of the Retail Parks is important but managing the nature and scale of the facilities in this location 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.





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 - To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**

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 areas of the Green Belt and Green Wedges that did not fulfil their respective purposes. Where appropriate, these areas have been re-designated as either Green Wedge or Green Finger. In all the circumstances, including the level of housing need, it was decided that exceptional circumstances for Green Belt release were present and land was released in order to meet the OAHN, including one area of Green Belt to the east of Harlow, which also did not fulfil the purposes of the Green Belt. That land has been allocated as the district's Strategic Housing Site. The existing Green Wedge has been extended to run eastwards through the site. Four sites that were once part of the Green Wedges have been allocated as housing sites.

10.9 In accordance with national 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.

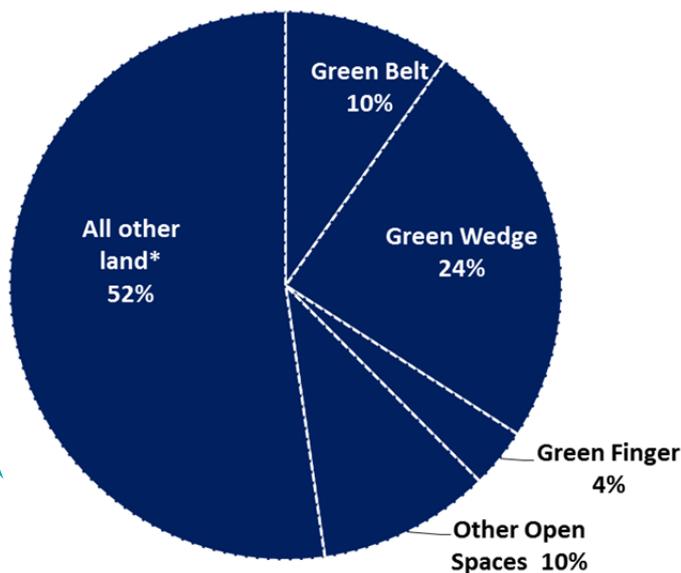
10.10 It is important, therefore, that this network is protected and that new Green Infrastructure is included in new development, preferably linking with the existing Green Infrastructure network, supported by viable management and maintenance plans which include funding for the ongoing maintenance of new Green Infrastructure.

Implementation

10.11 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 water bodies found in green spaces and 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.

10.12 The Green Infrastructure network in Harlow includes the Green Belt, Green Wedges, Green Fingers and Other Open Spaces. On a smaller scale, it also includes trees, hedgerows 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

10.13 Green Infrastructure is protected from inappropriate development and, where possible, enhanced.

- 10.14 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.
- 10.15 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.
- 10.16 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 Wedges and Green Fingers

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

The roles of the Green Wedges are to:

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

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

- provide open links between Green Wedges and/or other areas of green space;
- provide Green Infrastructure, wildlife corridors, footpaths, cycleways and bridleways;
- protect and enhance natural habitats, ecological assets and landscape features; and
- protect existing uses which have an open character.

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

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

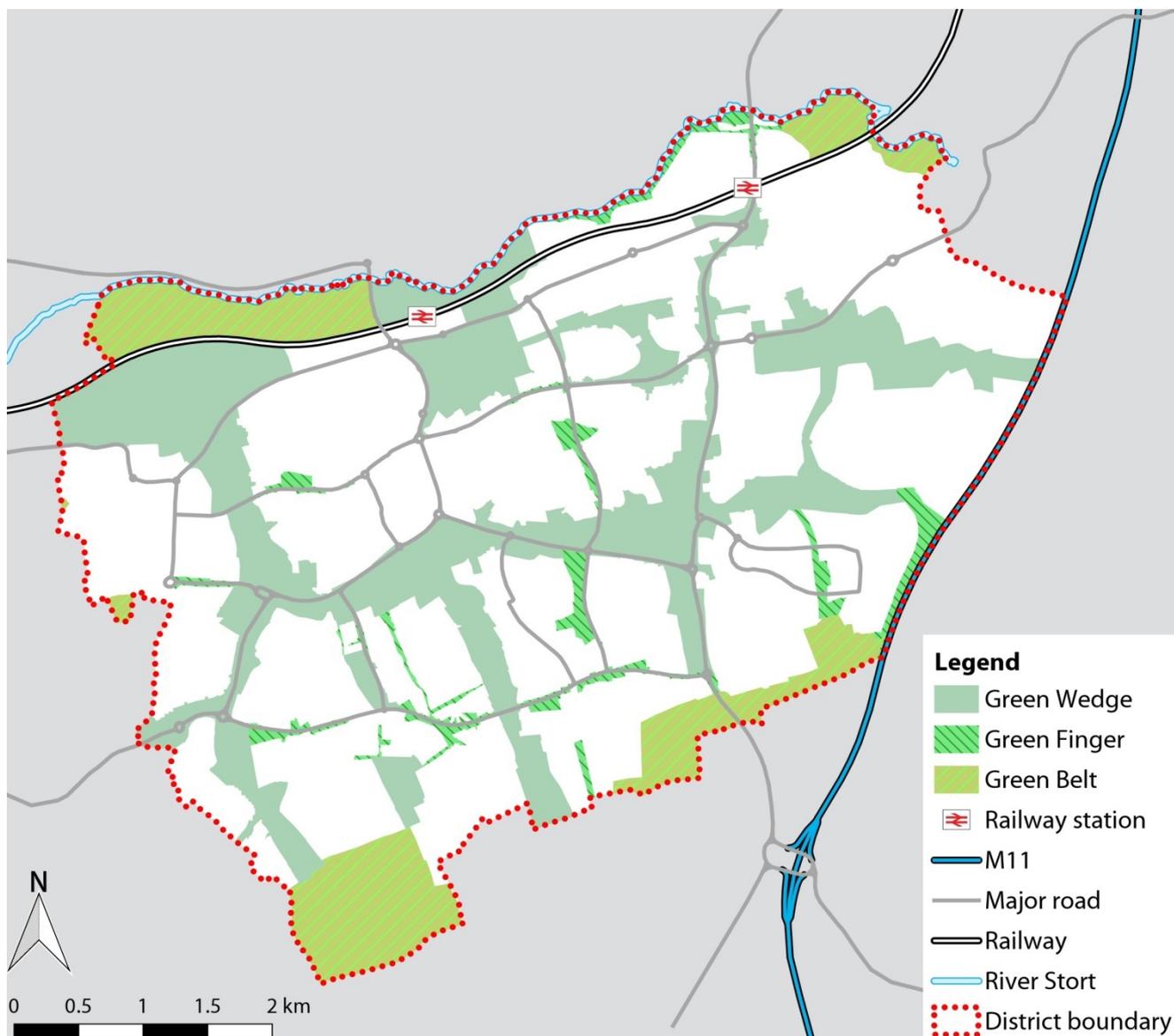
Justification

10.17 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.

10.18 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.

10.19 The extent of Green Wedges and Green Fingers in Harlow, as allocated on the Policies Map, is shown in Fig. 10.2.

Fig. 10.2: Green Wedges and Green Fingers in Harlow



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Implementation

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

10.21 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.

10.22 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 Communities, linking with the existing Green Wedge to the west and the Green Belt (in the Epping Forest District) to the east.

- 10.23 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 Biodiversity and Geodiversity

All biodiversity and geodiversity assets in the district will be preserved and enhanced. Assets of sufficient importance have a designation. The types of asset designations are:

- National designations (e.g. Sites of Special Scientific Interest)
- Local designations (e.g. Local Wildlife Site or Local Nature Reserve)
- Ancient woodland
- Aged or veteran trees outside ancient woodland

Nationally and locally designated assets are identified on the Policies Map.

Justification

- 10.24 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.

- 10.25 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

- 10.26 The biodiversity and geodiversity assets are protected from inappropriate development.

- 10.27 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 national, regional or local importance.

WE4 Heritage

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

- Conservation Areas
- Scheduled Monuments
- Listed buildings and their curtilage
- Historic parks and gardens
- Archaeological remains

Locally listed buildings are known as non-designated heritage assets. The Conservation Areas, Scheduled Monuments and historic parks and gardens are identified on the Policies Map.

Justification

10.28 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. National 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.

10.29 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.

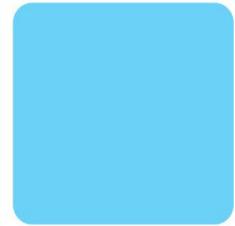
10.30 Harlow has one Historic Park and Garden to the east of the district which was previously owned, developed and maintained by Sir Frederick Gibberd. The gardens and the house are located within the Stort Valley to the east of Harlow.

Implementation

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

10.32 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.

10.33 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 - To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**

- **Objective 12 - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities**
- **Objective 13 - Reduce the need to travel by vehicle by ensuring new development is sustainably located or accessible by sustainable modes of transport**
- **Objective 14 - Improve transport links, particularly sustainable modes of transport, to community facilities**
- **Objective 15 - 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 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 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. 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 Gilden 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 focussed 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.
- 11.13 In Harlow there is an overall need to provide 11.1FE of secondary school places (gross). A new secondary school will be provided in the Epping Forest District, in the new Garden Community to the east of Harlow, and a new 8FE secondary school is being opened in Harlow. There is also additional capacity in some of the existing secondary schools in Harlow.
- 11.14 There is an overall need to provide 11.9FE of primary school places (gross) in Harlow, 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 Group and NHS to deliver new health facilities as part of planned growth. New healthcare facilities will be delivered as part of new settlements ideally located in accessible locations, situated in a local centre with a range of other community facilities.
- 11.18 The Princess Alexandra Hospital NHS Trust 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. 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

- 11.19 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.
- 11.20 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 master planning of the other Harlow and Gilston Garden Town Garden Communities.
- 11.21 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.
- 11.22 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

- 11.23 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.
- 11.24 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.
- 11.25 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.
- 11.26 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 ensure that broadband coverage extends into new developments and that telecommunications equipment is provided in Harlow.
- 11.27 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.

- 11.28 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.
- 11.29 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.
- 11.30 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.

Implementation

- 11.31 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.
- 11.32 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.
- 11.33 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 and the developer. The Council is preparing 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.

11.34 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.

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 Gilden 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. Vehicular and pedestrian access points to the north of the Town Centre
7. 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:

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

Justification

11.35 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

11.36 Improvements and enhancements will be sought through the design and master planning 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 Spatial Vision and Design Charter.

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

11.37 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.

11.38 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%²⁰.

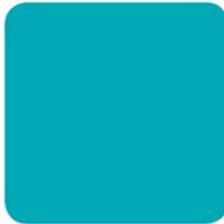
Fig. 11.1: Waste Hierarchy



Footnotes:

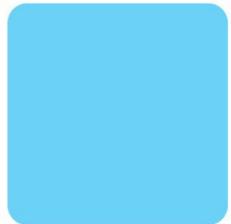
²⁰ The EU Waste Framework Directive states that the UK must recycle 50% of household waste by 2020.

11.39 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.



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 policies state that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three roles:
- an economic role by contributing to a strong, responsive and competitive economy;
 - a social role by supporting strong, vibrant and healthy communities; and
 - 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



Harlow Local Development Plan

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**

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 Spatial Vision and Design Charter, and relevant national guidance;
- (b) it protects, enhances or improves local distinctiveness, taking account of local character, patterns of development, urban form and landscape character, Green Infrastructure including trees and landscaping, building typology, detailing and materials front boundary treatments and the historic environment;
- (c) it provides appropriate physical, legible and safe connections with surrounding streets, paths, neighbouring development and Green Infrastructure;
- (d) it responds to the scale, height, massing, architectural detailing and materials of the surrounding area, is visually attractive and respects its context without restricting style and innovation;
- (e) it provides logical and legible layouts which support active street frontages, improve the public realm, provide 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.
- 13.7 The 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.

Implementation

- 13.8 A Supplementary 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 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.

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 The 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. Such development will be supported where it meets or exceeds the minimum standards required by Building Regulations.

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 The policy encourages applicants to consider the impact of their development and seek ways to address the effects, beyond those measures required by Building Regulations.

Implementation

- 13.17 The Building Regulations set out the minimum requirements for the conservation of fuel and power. The associated guidance suggests measures to reduce energy consumption and carbon dioxide emissions, which include the consideration of:
- (a) appropriate layout and building orientation to maximise solar gain in the winter;
 - (b) the use of Green Infrastructure, such as trees and rain gardens;
 - (c) efficient use of all roof and vertical surfaces for the installation of low carbon technologies and green roofs;
 - (d) integrating passive ventilation, such as wind catchers, or low energy options where mechanical ventilation or cooling is required;

- (e) generating energy from on-site renewable or low-carbon energy systems;
- (f) the use of local, sustainable and energy efficient materials; and
- (g) the re-use of existing resources.

13.18 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 (CO₂) emissions. The energy hierarchy set out in the Strategic policies should be considered within the Sustainability Statement. The Sustainability Statement should also make clear how measures have been incorporated into the design of the development to ensure they are well integrated.

13.19 Where a Sustainability Statement is submitted, the developer will be required to provide evidence of the implementation of the target total carbon dioxide (CO₂) 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 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 essential infrastructure and local transport infrastructure which must demonstrate a requirement for a Green Wedge or Green Finger location;
- (c) it is for the replacement of buildings, provided that the new building/buildings are in the same use and not more harmful than what is being replaced;
- (d) it constitutes strategic infrastructure development which can demonstrate that it is of benefit to the wider community.

Additionally, development must meet both the following criteria:

- (e) it demonstrates that the roles and functions of the Green Wedges and Green Fingers are preserved, enhanced and not adversely affected; and
- (f) it demonstrates that the wider landscape and setting is preserved, enhanced, promotes biodiversity and integrates with existing Green Infrastructure.

Justification

- 13.20 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.
- 13.21 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

- 13.22 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 the Strategic policies.
- 13.23 Small-scale development can include householder applications, school or sports related development, recreation and community uses.
- 13.24 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.

PL5 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

- 13.25 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.
- 13.26 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.
- 13.27 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

- 13.28 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:
- strips of landscaping, for example next to a road, pavement or cycle path;
 - amenity spaces and gardens;
 - areas of land between buildings;
 - informal recreational areas; and
 - woodland and landscaping belts.
- 13.29 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.

PL6 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

13.30 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.

13.31 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.

13.32 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

13.33 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.

13.34 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.

13.35 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).

13.36 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.

13.37 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.

13.38 Where appropriate, the Council will consult with specialists to obtain advice on tree and hedgerow matters.

PL7 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

13.39 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.

13.40 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.

13.41 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

13.42 Green Infrastructure is multi-functional natural and man-made green space, including parks, playing fields, woodlands, allotments and wildlife corridors. At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs and green walls.

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

- 13.44 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.

PL8 Biodiversity and Geodiversity Assets

Development should contribute to and enhance biodiversity or geodiversity assets.

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.

Development must meet the following criteria:

- (a) it creates new biodiversity and protects geodiversity assets and creates links to existing biodiversity and geodiversity assets;
- (b) it includes the protection and enhancement of existing biodiversity and geodiversity assets;
- (c) where it can be demonstrated that protection and enhancement of existing biodiversity and geodiversity assets is not possible, appropriate measures must mitigate the negative effects on these assets.

Justification

- 13.45 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 enable the appreciation of wildlife.
- 13.46 Helping to protect and enhance biodiversity is one of the fundamental aims of national policies and guidance, to halt the overall decline in biodiversity. This policy aims to ensure the continued protection and enhancement of biodiversity and geodiversity assets in Harlow.

Implementation

- 13.47 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, ancient woodland, and aged or veteran trees found outside ancient woodland. There are, as yet, no designated geodiversity assets in Harlow.
- 13.48 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.

13.49 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.

13.50 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.

PL9 Pollution and Contamination

All development proposals must minimise and, where possible, reduce all forms of pollution and contamination.

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

- noise pollution;
- light pollution;
- air quality (including dust, odour and emissions);
- vibration;
- surface and ground water quality;
- land quality, condition and stability;
- the natural environment;
- the built environment;
- general amenity;
- health and safety of public;
- 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.

Justification

13.51 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

13.52 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.

13.53 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.

13.54 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

13.55 The Council may require assessments of any pollution and/or contamination 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. 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.

PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems

1. Water Quality

Development must not adversely affect water quality, including quality of waterways and other bodies of water, identified Source Protection Zones (SPZ), Aquifers and all other groundwater.

New development adjacent to water courses should seek to include restoration and de-culverting. The culverting of water courses should be avoided.

2. 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.

3. 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;
- (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) flood 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 watertight depth of 300mm above the normal water level;
- (d) 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;
- (e) any necessary flood protection or mitigation measures should not have an undue impact on nature conservation, landscape character, recreation or other important matters;
- (f) there should be no net loss in flood storage on-site;
- (g) flood flow routes should be preserved;
- (h) where necessary, planning permission will be conditional upon flood protection and/or runoff control measures being operative before other works.

4. Sustainable Drainage Systems (SuDS)

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 greenfield runoff rates;
- (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.

Justification

13.56 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.

- 13.57 This policy will ensure that the quality of drinking water is maintained, avoiding harmful polluting developments which affect its quality.
- 13.58 The 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.
- 13.59 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 CO₂ and 15m³ of water per year per house.
- 13.60 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.
- 13.61 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.

Implementation

- 13.62 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.
- 13.63 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.
- 13.64 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.
- 13.65 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.

- 13.66 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.
- 13.67 The risk of flooding can be avoided and reduced by:
- 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;
 - ensuring that development proposals in flood risk areas actively manage and reduce flood risk by applying the sequential approach at site level;
 - where possible, the footprint of existing buildings should be reduced;
 - where possible, flood storage should be maximised through the use of Green Infrastructure.
- 13.68 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. into the ground (infiltration);
 2. to a surface water body;
 3. to a surface water sewer, highway drain, or another drainage system;
 4. to a combined sewer.
- 13.69 Methods of attenuation include attenuation ponds, filter strips and swales.
- 13.70 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.
- 13.71 The Council will consult the statutory bodies on drainage systems where it is applicable to do so.
- 13.72 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.

PL11 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 the significance of the heritage asset;
- (e) any public benefits of the development.

Where development affects a heritage asset or its setting, an appropriate management plan, which includes a Heritage Statement, must be in place to conserve and enhance the asset and its setting.

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 is necessary to secure the future conservation of the asset and that any negative impacts are outweighed.

Justification

13.73 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.

13.74 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.

13.75 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.

- 13.76 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.
- 13.77 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

- 13.78 Designated heritage assets can include listed buildings, curtilages of listed buildings, conservation areas, archaeological remains, Scheduled Monuments and historic parks and gardens. Locally listed buildings are known as non-designated assets. Historic England administers national designations which include all designated heritage assets apart from conservation areas.
- 13.79 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. National policies also set out the hierarchy of significance of historic assets.
- 13.80 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

- 13.81 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.
- 13.82 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.
- 13.83 Where planning permission is required for alterations or additions to listed and locally listed buildings, a Statement of Significance and 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.

13.84 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.

13.85 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

13.86 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.

13.87 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

13.88 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.

13.89 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.

PL12 Advertisements

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

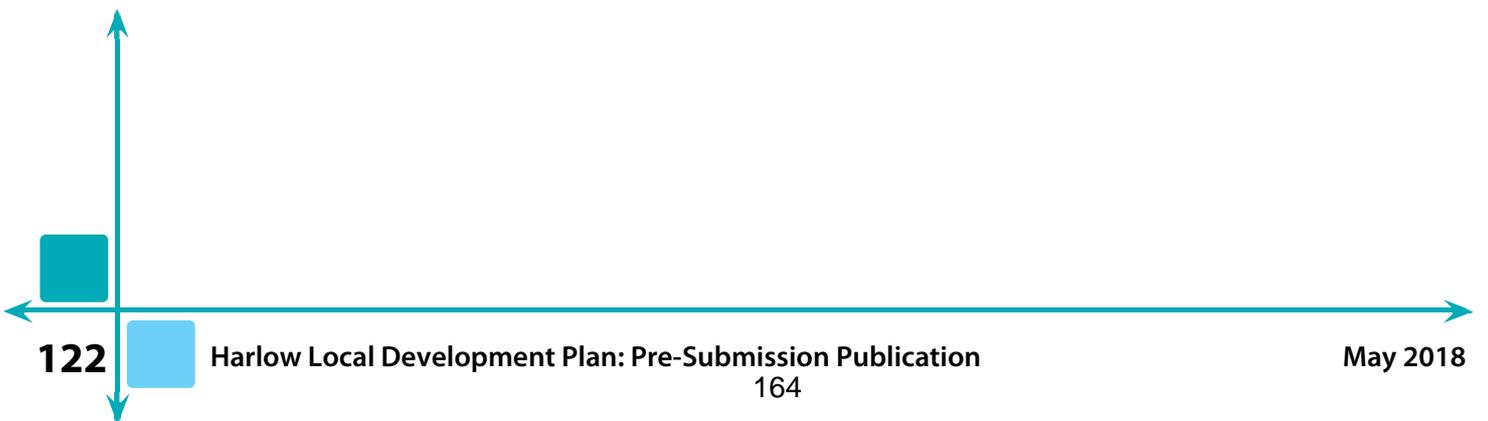
- (a) the effect the advertisement may have on the general amenity of the area, including the historic environment, and the presence of any features of landscape or cultural significance;
- (b) the position of the advertisement in comparison to the scale and size of the host building;
- (c) the cumulative 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.

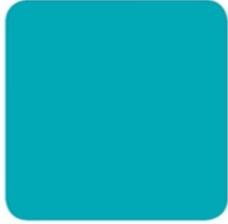
Justification

13.90 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.

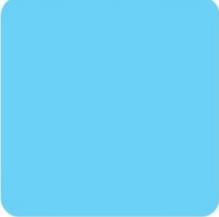
Implementation

13.91 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.





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**

H1 Housing Allocations

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

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

Development of all allocated housing sites must accord with the principles of the Harlow and Gilston Garden Town Spatial Vision and Design Charter.

Justification

14.5 The housing requirement for the district is set out in the Strategic policies. 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 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. 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.

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 The 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.

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 economically 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

All new dwellings should be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs.

In addition, major residential development should provide Building Control Part M4(3) standard dwellings for wheelchair users. The proportion is set out in the latest Strategic Housing Market Assessment (SHMA).

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

Justification

- 14.23 National policies require Local Plans to support Building Control regulations by demonstrating the need for requiring accessible dwellings. This is supported by the Joint Strategic Needs Assessment for Essex.
- 14.24 The Building Regulations, published in 2015, set out three categories of dwellings:
- Part M4(1): Visitable dwellings (all properties must be broadly accessible)
 - Part M4(2): Accessible and adaptable dwellings
 - Part M4(3): Wheelchair user dwellings
- 14.25 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 Control Part M4(3) standard.

Implementation

- 14.26 The Building Control 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.

14.27 The proportion of major residential development which is required to be of Building Control Part M4(3) standard is set out in the current SHMA or successor studies.

H6 Housing Mix

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.

Justification

14.28 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. 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 policies and guidance.

14.29 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.

14.30 The range of housing types, sizes and tenures is based on the current SHMA (see Fig. 14.1) or successor studies.

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

MARKET HOUSING		%
Flat	1 Bedroom	6.8
	2+ Bedrooms	1.2
House	2 Bedrooms	24.4
	3 Bedrooms	67.6
	4 Bedrooms	0.02
	5+ Bedrooms	-
AFFORDABLE HOUSING		
Flat	1 Bedroom	2.9
	2+ Bedrooms	16.1
House	2 Bedrooms	27.6
	3 Bedrooms	41.1
	4+ Bedrooms	10.5

Implementation

- 14.31 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.
- 14.32 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

- 14.33 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

- 14.34 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).

- 14.35 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

Major residential development must provide at least 30% affordable housing. Reduction of this percentage will require an independent viability assessment.

Justification

- 14.36 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).
- 14.37 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

- 14.38 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.
- 14.39 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.
- 14.40 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.
- 14.41 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

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.

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.

Justification

- 14.42 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.
- 14.43 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.
- 14.44 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

- 14.45 This policy will be delivered through the approval of individual planning applications sites allocated in the Strategic policies, and through conditions on planning permissions to secure the self-build plots for a period of two years.
- 14.46 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. The Council encourages developers and land owners to consult the Council's register to establish the current demand for self-build and custom-housebuilding and meet that demand accordingly.

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, or designated and locally identified habitats;
- (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 other 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.

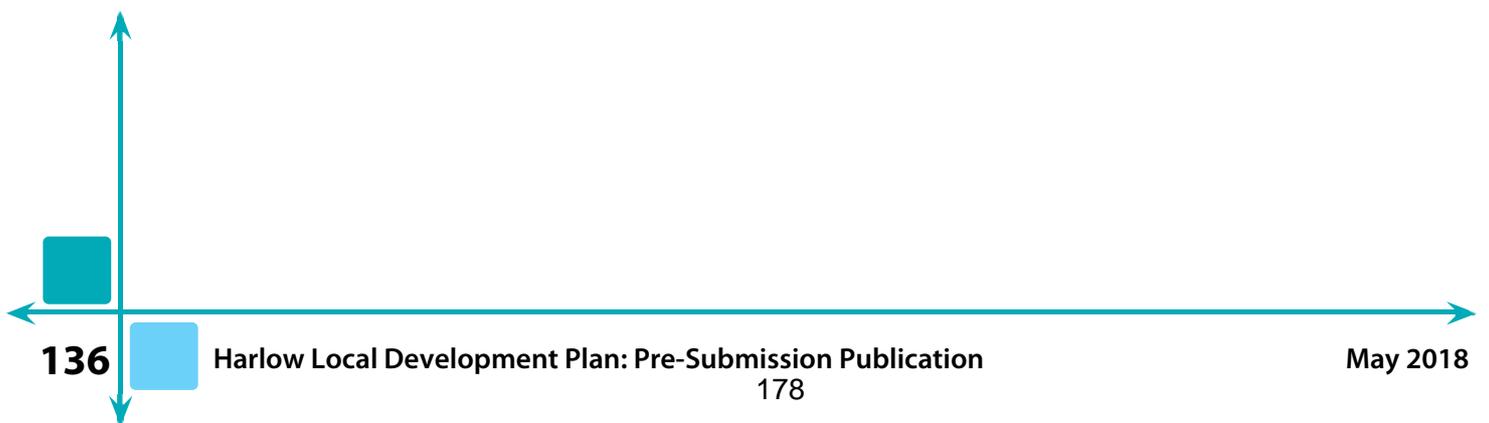
Justification

14.47 The Strategic policies allocate pitches for Travellers 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.

14.48 The 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. The policy also seeks to prevent development prejudicing the potential for comprehensive development of adjacent land.

Implementation

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

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**

PR1 Development within Employment Areas

Development in 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 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 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 must be 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 previously 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 sq m 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%²¹) 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. The Council will determine how long a marketing exercise should be on a case-by-case basis.

Footnotes:

²¹ Source: 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 Employment Areas and Neighbourhood Service Areas will be permitted 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 not be permitted outside of the district's Employment Areas and Neighbourhood Service Areas unless 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 B2 and B8 use classes 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:

1. employment of local people;
2. work related training provision;
3. education opportunities; and
4. 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. The 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 The policy will be applied to major developments and secured through a planning obligation, 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.

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 The Strategic policies set 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 existing centres 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 the Town Centre 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 permitted 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 where it is considered appropriate and where it strengthens the role of the Town Centre as a sub-regional centre.

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 one year. 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 2,500 sq m, evidence has been provided to demonstrate that the unit has been actively marketed to the satisfaction of the Council for at least two years;
- (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. The 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 2,500 sq m 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 2,500 sq m 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, must meet 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 The 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 a Supplementary Planning Document (SPD).

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, the 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 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. The 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 The policy does support 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.

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.

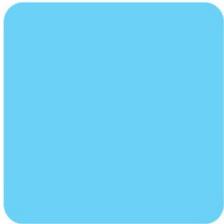
- 15.51 Where there may be potential negative impacts associated with evening and night time uses, the Council will seek to mitigate this through legal agreements or conditions to ensure the development does not lead to significant problems such as crime, anti-social behaviour, litter and noise nuisance.

Implementation

- 15.52 Evening activities include drinking establishments, restaurants and pubs that are open in the evening. Late night activities 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 - To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district**

L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development

In major development, public open space and play space and, where appropriate, allotments and sporting provision and facilities are required, together in all cases with their management and maintenance.

Justification

- 16.5 National 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) 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.

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, including playing fields, play spaces, allotments and sports clubs, will be permitted 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

Developments that will result in the loss of all or part of any recreation, sports, cultural or community uses and/or facilities will not be permitted 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 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, sporting facilities and parks. 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. This list is 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.

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.

2. Development Involving the Provision, Relocation or Loss of Public Art

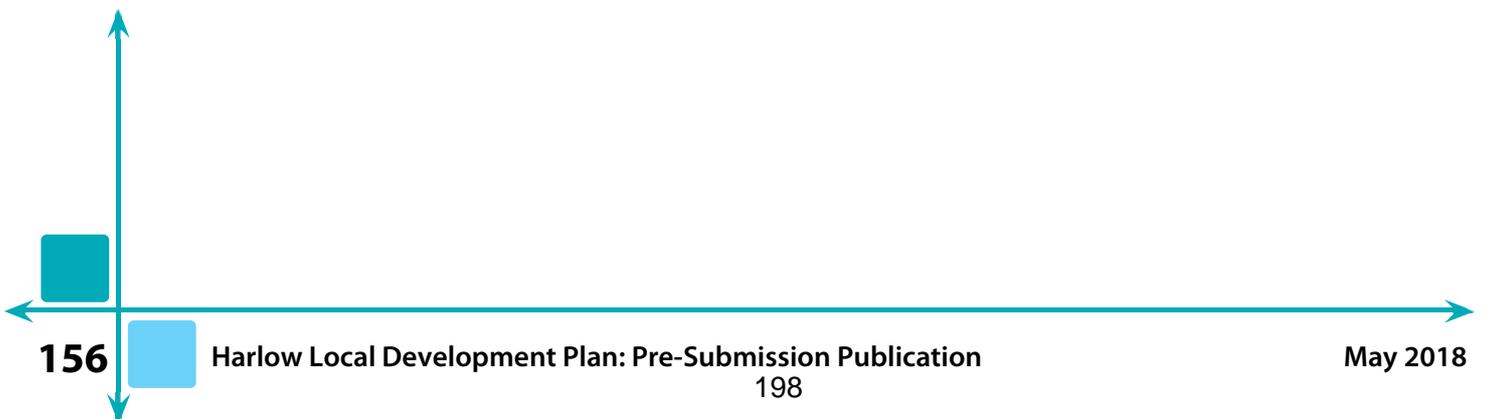
The commissioning and de-commissioning of public art must be agreed with the Council.

Justification

- 16.14 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.
- 16.15 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. 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

16.16 Detailed guidance on the provision, relocation and loss of public art will be set out in the Adopted Public Art SPD.



DEVELOPMENT MANAGEMENT
17. Infrastructure



Harlow Local Development Plan

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 - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities**
- **Objective 13 - Reduce the need to travel by vehicle by ensuring new development is sustainably located or accessible by sustainable modes of transport**
- **Objective 14 - Improve transport links, particularly for sustainable modes of transport, to community facilities**

IN1 Development and Sustainable Modes of Travel

1. Sustainable Accessibility

All development should have regard to the modal hierarchy as set out in the Strategic policies.

New developments including redevelopments, changes of use and Town Centre and transport interchange improvements will be required to 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 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 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. For residential development, 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 significant detrimental 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 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 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 recommend that any TA and/or TS be agreed with the Highway Authority and the 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 per cent 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. 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.

IN4 Broadband and Development

1. Broadband Provision in Major Development

Major development should contribute towards the provision of infrastructure suitable to enable the delivery of high-speed broadband services across the Harlow area.

2. Broadband Infrastructure Development

Broadband infrastructure development must be accompanied by a report which meets 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.

IN5 Telecommunications Equipment

Development of telecommunications equipment must meet the following criteria:

- (a) 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.

IN6 Planning Obligations

Planning permission will only be granted for development if the provision is secured for related infrastructure, affordable housing, services, facilities and environmental protection 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 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.

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. Where developers believe that viability is an issue, applicants will need to make a submission to the Council which should include the following:

- a financial viability appraisal;
- a statement outlining the benefits and risks of not meeting the policy requirements and the site being delivered immediately.

17.35 Further guidance will be available in an Adopted Planning Obligations Supplementary Planning Document (SPDs).

17.36 Development can create a need for the provision of services, facilities and infrastructure both on-site and off-site. This provision may include:

- affordable housing;
- open spaces and Green Infrastructure;
- communications infrastructure;
- public art;
- community and social facilities;

- transport improvements;
- culture and recreation facilities;
- utility services;
- education and health facilities;
- emergency service requirements;
- measures to protect and enhance amenity or the environment, including biodiversity and wildlife habitats.

17.37 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.

17.38 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.

17.39 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 policies and objectives, such as the protection of the environment.

17.40 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



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
Housing Strategy and Growth Locations	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, HGGT1

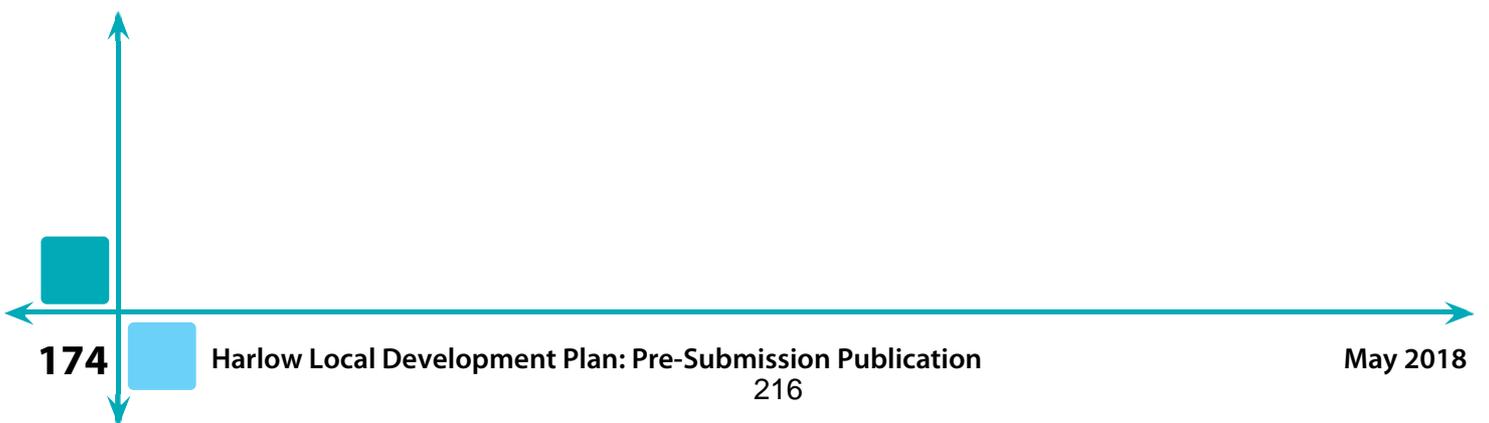
Policy Area	Indicator	Target	Monitoring Policies
	Number of new Gypsy and Traveller pitches completed	Restore 12 derelict pitches at Fern Hill Lane site	HS4, H10
	Houses in Multiple Occupation (HMOs) on the HMO register	The number of HMOs will not exceed more than one out of a row of five units	H3
	Net change on existing habitable housing stock	No net loss in habitable housing stock	H4
	Percentage of new dwellings meet the Building Control Part M4(2) Standard for accessible and adaptable homes	100%	H5
	Number of dwellings for wheelchair users under the Building Control 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 in new major residential developments	At least 30% for the new major residential development (Reduction of this rate will require an independent viability assessment)	H8
	Net additional land allocated for self-build	Development of housing sites greater than 50 dwellings must include 5% of serviced plots for self-build	H9

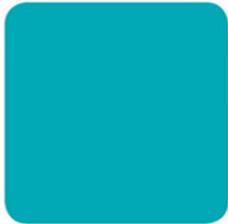
Policy Area	Indicator	Target	Monitoring Policies
Economic Development and Prosperity Strategy	Net additional employment floorspace up to 2033	4.6 ha in Harlow Business Park, The Pinnacles	ED1
		14.2 ha in London Road	
		2.2 ha in East Road, Templefields	
	Net loss of employment floorspace in Strategic Employment Areas and Neighbourhood Service Areas	No net loss of employment floorspace in Strategic Employment Areas and Neighbourhood Service Areas	ED2, PR1, PR2
	Change in number of visitors	Increasing 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	Increasing trend	PR4
Retail Ambitions and Town Centre Redevelopment	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

Policy Area	Indicator	Target	Monitoring Policies
	Net additional retail floorspace in existing Retail Centre	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); and Increasing trend in evening and night time uses	RS2, RS3, PR6, PR1
	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 2,500m ²	No net loss in number of larger retail units in the Town Centre	PR7
	Concentration of same use class in Neighbourhood Centres	No more than two adjacent units being in the same use class other than A1	PR8
	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

Policy Area	Indicator	Target	Monitoring Policies
Linking Development Sites to the Wider Environment	Retention of Green Belt, Green Wedge, Green Finger or Other Open Space	No loss in Green Belt, Green Wedge, Green Finger or Other Open Space	WE1, WE2, PL4, PL5, PL7
	Change in number of biodiversity and geodiversity designated assets in the district	No loss in number of biodiversity and geodiversity designated assets	WE3, PL8
	Change in number and area of heritage assets in the district.	No loss in number of heritage assets	WE4, PL11
	Risk of pollution and contamination	No Air Quality Management Areas in Harlow	PL9
	Percentage of new dwellings achieving the Optional Technical Housing Standard for water efficiency (no more than 110 litres per person per day)	100%	PL10
Strategic Infrastructure Requirements	Delivery of strategic and local infrastructure to support new development	Delivery of infrastructure in accordance with Infrastructure Delivery Plan	SIR1, IN1, IN2
	Delivery of improvements and enhancements to key gateway locations	No target	SIR2
	Percentage of recycling household waste	Recycle 50% of household waste by 2020	SIR3

Policy Area	Indicator	Target	Monitoring Policies
Lifestyle	Amount of public open space, allotments, play space and sporting provision and facilities	No net loss of public open space, allotments, play space and sporting provision	L1
	Change in number and area of Recreational, Sporting, Cultural and Community Facilities	No unnecessary loss in number and area of Recreational, Sporting, Cultural and Community Facilities	L2
	Change in number of public art in Harlow	No net loss in public art provision and increase in amount	L3





MONITORING AND IMPLEMENTATION
19. Implementation



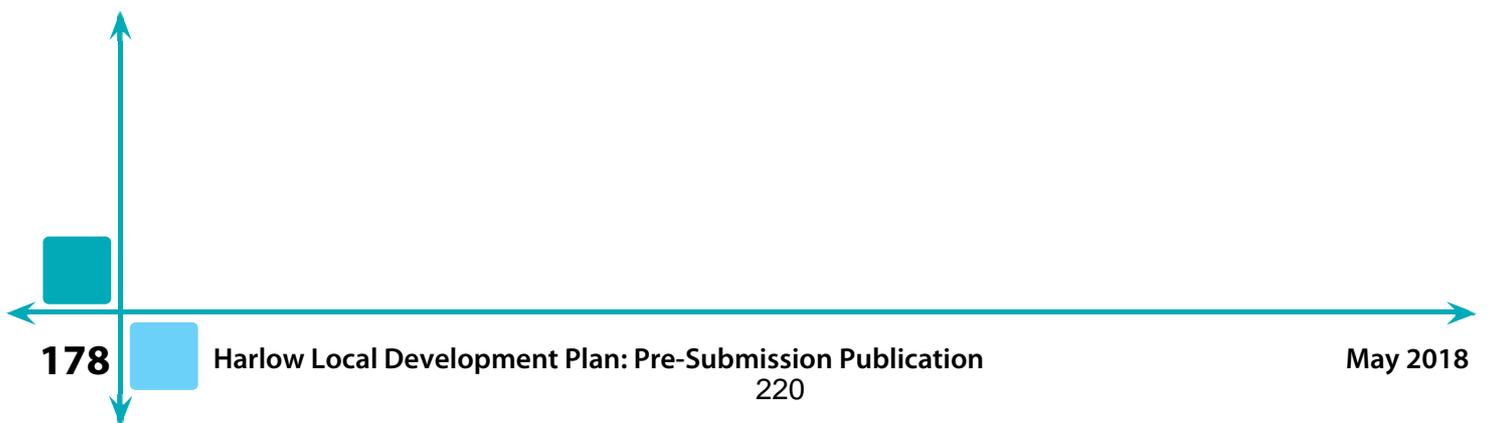
19. IMPLEMENTATION

- 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 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 master plan and design code for the site through the Garden Town will ensure consistency between the two authorities. The Spatial Vision and Design Charter 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.

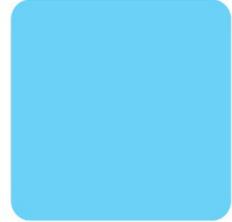
- 19.8 If there is insufficient supply of land, or other targets are not being met as set out in the AMR, the Council will consider whether a full or partial review of the Local Plan is required.







Glossary



GLOSSARY

Disclaimer: *The 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.*

Affordable Housing	Includes social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market.
Aged or veteran trees	A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally.
Air Quality Management Areas (AQMA)	Areas designated by local authorities where national air quality objectives are not likely to be achieved by set deadlines.
Allotments	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.
Ancient woodland	A protected area that has been wooded continuously since at least 1600.
Area Action Plan (AAP)	A Development Plan Document that provides specific planning policy and guidance for an area where significant regeneration or investment needs to be managed.
Article 4 Direction	Direction removing some or all permitted development rights, for example within a conservation area or curtilage of a listed building. Article 4 Directions are issued by local authorities.
Attenuation	Reduction of peak flow and increased duration of a flow event.
Authority Monitoring Report (AMR)	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.
Biodiversity	The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.
Building Regulations	The minimum standards for design, construction and alterations to buildings. They are developed by the Government and approved by Parliament.
Claimant Count	Measures the number of people claiming unemployment-related benefits.
Climate Change	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.

Climate change adaptation	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.
Climate change mitigation	Action to reduce the impact of human activity on the climate, primarily through reducing greenhouse gas emissions.
Community Infrastructure Levy (CIL)	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. Learn more about the Community Infrastructure Levy.
Conservation Area	An area of notable environmental or historical interest or importance which is protected by law against undesirable changes.
Design Code	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 masterplan or other design and development framework for a site or area.
Development Management Policies	Local Plan policies which guide applicants applying for planning permission for proposed development. The proposed development is assessed on these policies and other policies in the Local Plan.
Development Plan Document (DPD)	<p>Development Plan Documents provide a spatial strategy 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.</p> <p>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.</p>
Duty to Cooperate	Places 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 as a 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 plan set out an overarching development strategy for the eastern region and was officially revoked by Parliament in January 2013.
Employment Areas	Area allocated to meet the 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 state incentives such as tax concessions are offered to encourage business investment.
Flood Zone	<p>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.</p> <p>Zone 1: Low probability: This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%)</p> <p>Zone 2: Medium probability: This zone comprises 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.</p> <p>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. 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.</p> <p>Zone 3b: Functional Flood plain: This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify areas of functional floodplain, in agreement with the Environment Agency. The identification of functional floodplain should take account of local circumstances.</p>
Functional Economic Market Area (FEMA)	Functional Economic Market Areas are spatial areas that can be mapped by a combination of the key indicators of economic activity and across areas.
Garden City/Town/Community	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.
Gateway location	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.
Geodiversity	The full range of rocks, minerals, fossils, soils and landforms.
Green Belt	An area of open land around an urban area, on which building is restricted, primarily to prevent unrestricted sprawl.

Green Finger	Linear, open and predominantly green spaces which link to Green Wedges and have a recreational/movement function.
Green Infrastructure (GI)	Refers to multi-functional green spaces that provide habitat, flood protection, cleaner air, and cleaner water.
Green Wedge	A series of green spaces, kept free from development, which run through the urban area and allow residents to access to important landscapes and countryside.
Greenfield Land/Site	Land (or a defined site), such as farmland, that has not previously been developed.
Gross Value Added (GVA)	A measure in economics of the value of goods and services produced in an area, industry or sector of an economy.
Gypsies and Travellers	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.
Hatch	Small area of shops/other units which serve specific local needs and provide for a range of community services.
Heritage Asset	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).
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 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 classes of development.
Local Enterprise Partnership (LEP)	A body, designated by the Government, established for the purpose of creating or improving the conditions for economic growth in an area.
Local Nature Reserve (LNR)	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.
Local Plan	Overarching strategy for an area setting out the future development proposals for at least 15 years.
Local Wildlife Site (LWS)	Area of land with significant biodiversity value. They are identified locally using scientifically-determined criteria and ecological surveys. They vary in size from open marshes and river valleys to small meadows and secluded ponds.
London Stansted Cambridge Consortium (LSCC)	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.
Main Town Centre Uses	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).
Major Development	Development involving any 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 dwelling houses where - (i) the number of dwelling houses to be provided is 10 or more; or (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within subparagraph (c)(i); (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or (e) development carried out on a site having an area of 1

	hectare or more.
Market Housing	Private sector housing whose prices is set by the market.
Memorandum of Understanding (MoU)	A Memorandum of Understanding is 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.
Mineral Safeguarding Area (MSA)	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.
Minor Development	Development involving any one or more of the following - <ul style="list-style-type: none"> (a) 1-9 dwellings (unless floorspace exceeds 1000m² / under half a hectare) (b) Office / light industrial - up to 999 m²/ under 1 hectare (c) General industrial - up to 999 m²/ under 1 hectare (d) Retail - up to 999 m²/ under 1 hectare (e) Gypsy/traveller site – 0 to 9 pitches
National Park	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).
National Planning Policy Framework (NPPF)	Sets out the Government’s planning policies for England, and provides a framework within which local people and their Councils can produce their own distinctive Local and Neighbourhood Plans, which reflect the needs and priorities of their 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.
Neighbourhood Centres	Shops and other uses serving the local neighbourhood area; larger than hatches. Sometimes referred to as a Local Centre.
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 m ² in size being typically available.
New Town	Cities or towns that are designed from the outset and built in a relatively short period of time. They are designed by according to a master plan on a site where there was no settlement before. This distinguishes a New Town from a traditional urban area that gradually grows and evolves over

	time.
Objectively Assessed Housing Need (OAHN)	The assessment of housing need and the Council’s housing strategy, reflecting principles set out in national policies and guidance.
Older people	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.
Other Open Spaces	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.
People with disabilities	People have 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.
Pollution	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, including smoke, fumes, gases, dust, steam, odour, noise and light.
Permitted Development Rights (PDR)	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 (as amended).
Planning Condition	A condition imposed upon grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
Planning Obligation	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.
Planning Practice Guidance (PPG)	National guidance which adds further context to the NPPF and it is intended that the two should be read together.
Policies Map	Outlines a Local Plan’s policies and allocations on a map form.

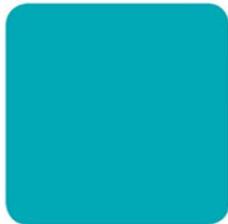
Previously Developed Land or Brownfield Land	Land which is or was occupied by a permanent structure, including at least some of the curtilage of the developed land and any associated fixed surface infrastructure. Excludes land occupied by agricultural or forestry buildings; land developed for minerals 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.
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).
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)	UK government use the EU definition of an SME. A medium business is one with less 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.
Source Protection Zones (SPZ)	The Environment Agency identifies SPZs to protect groundwater (especially public water supply) from developments that may damage its quality.
Statement of Community Involvement (SCI)	A document setting out how the Council will consult people and organisations on the preparation of the Local Plan and also on planning applications.
Strategic Flood Risk	An assessment of the likelihood of flooding in a particular area

Assessment (SFRA)	so that development needs and mitigation measures can be carefully considered.
Strategic Housing Land Availability Assessment (SHLAA)	A technical study which identifies sites with development potential for housing and assesses their developability, deliverability and capacity.
Strategic Housing Market Assessment (SHMA)	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.
Sui Generis	Uses of land or buildings not falling into any of the use classes identified by the Use Classes Order, for example theatres, launderettes, car showrooms and filling stations.
Supplementary Planning Document (SPD)	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.
Sustainability Appraisal (SA)	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.
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).

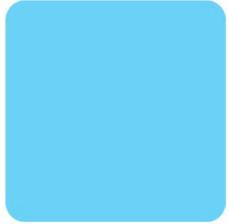
Windfall Sites

Sites which become available for development unexpectedly and are therefore not allocated as housing land in a Local Plan.





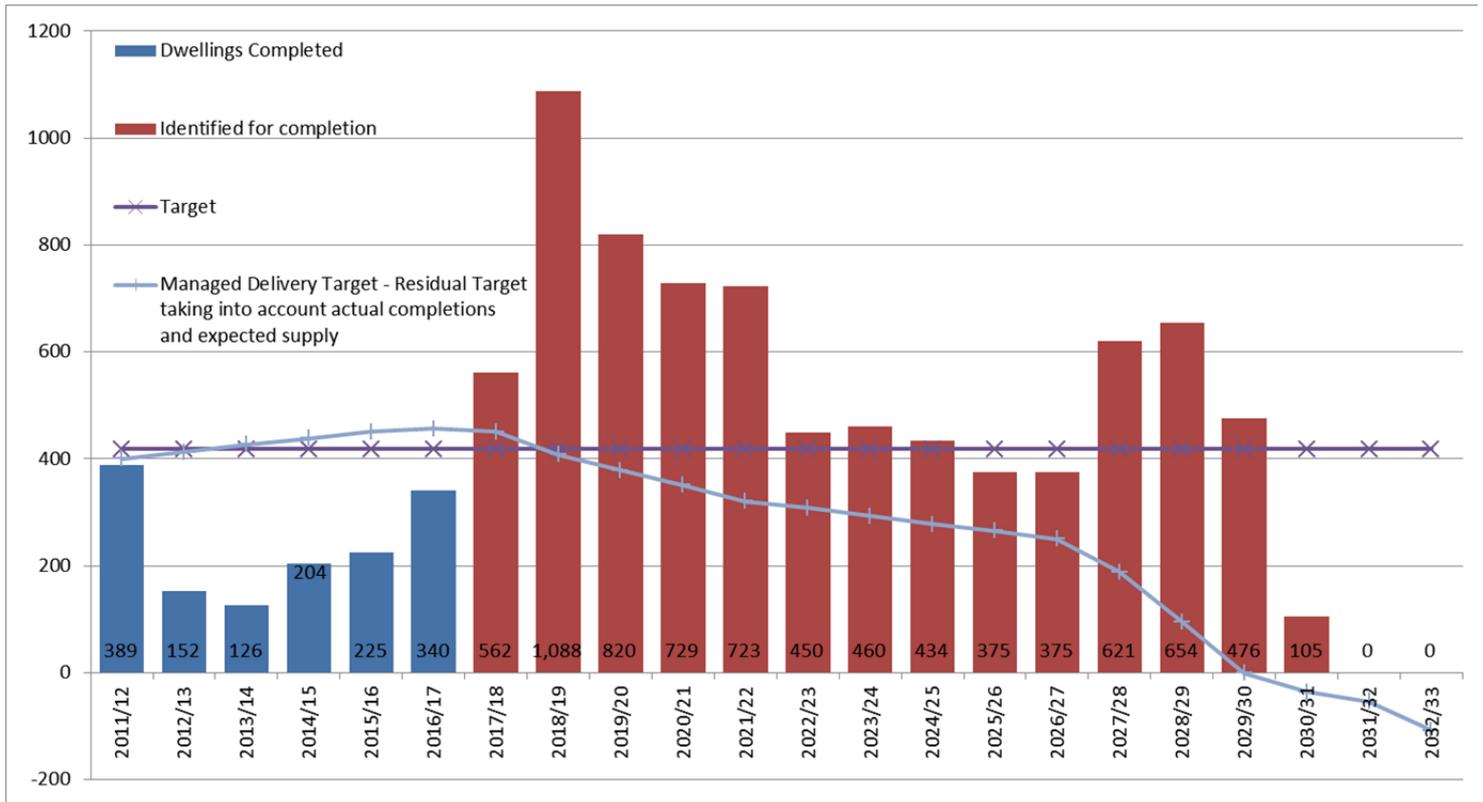
Appendices



APPENDIX 1: 5-YEAR LAND SUPPLY CALCULATION

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		5% Buffer	20% Buffer	
g	Buffers 0% 5% 20% [e; e*0.05; e*0.2]	0		158	633	
h	Total 5 year requirement with buffers [g+e] [h/5] (annual)	3164	633	3322	664	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	

APPENDIX 2: HOUSING TRAJECTORY



APPENDIX 3: NEIGHBOURHOOD CENTRES FRONTAGES

Bush Fair Neighbourhood Centre - Frontages

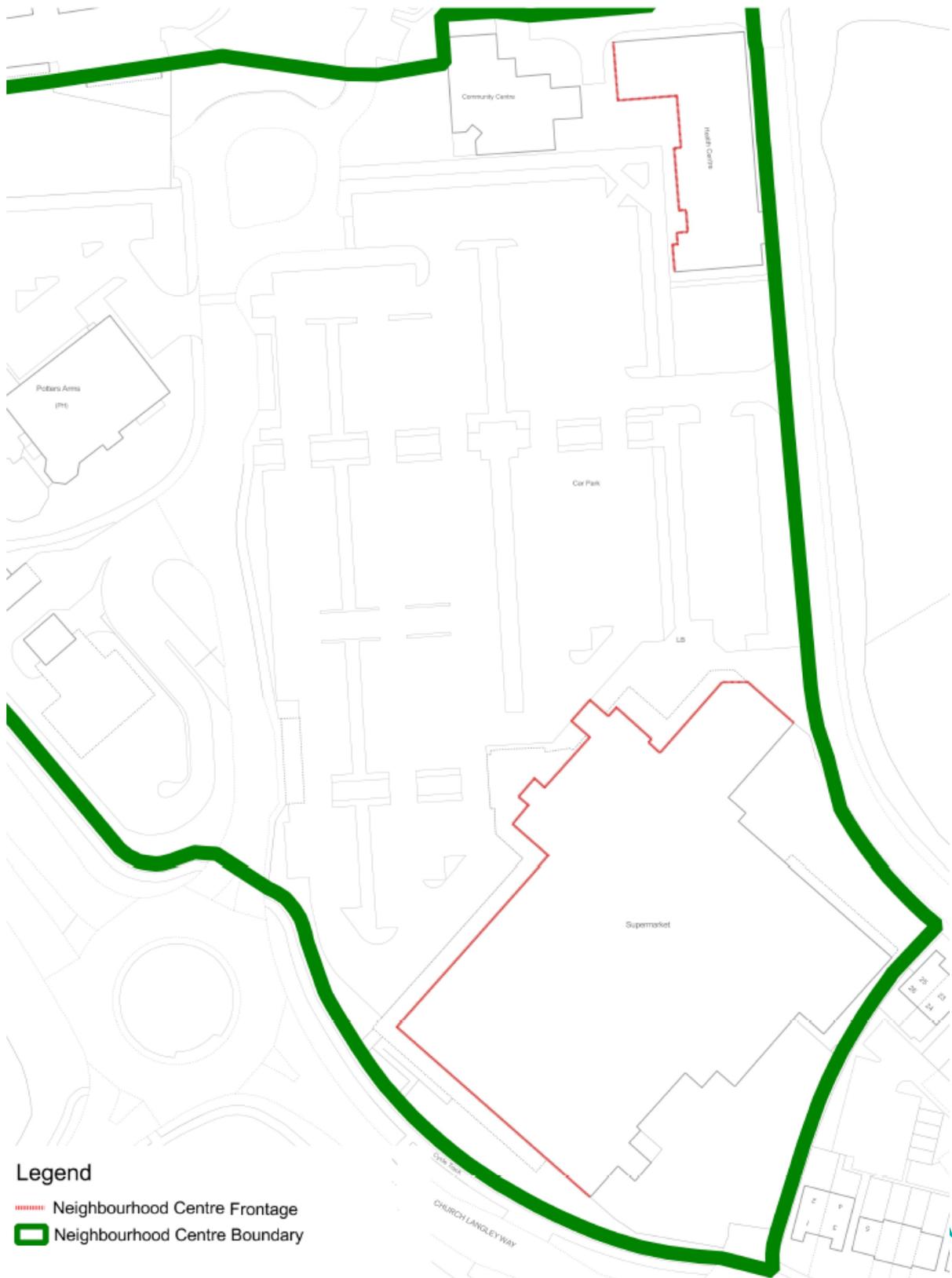


Legend

- Neighbourhood Centre Frontage
- Neighbourhood Centre Boundary

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Church Langley Neighbourhood Centre - Frontages



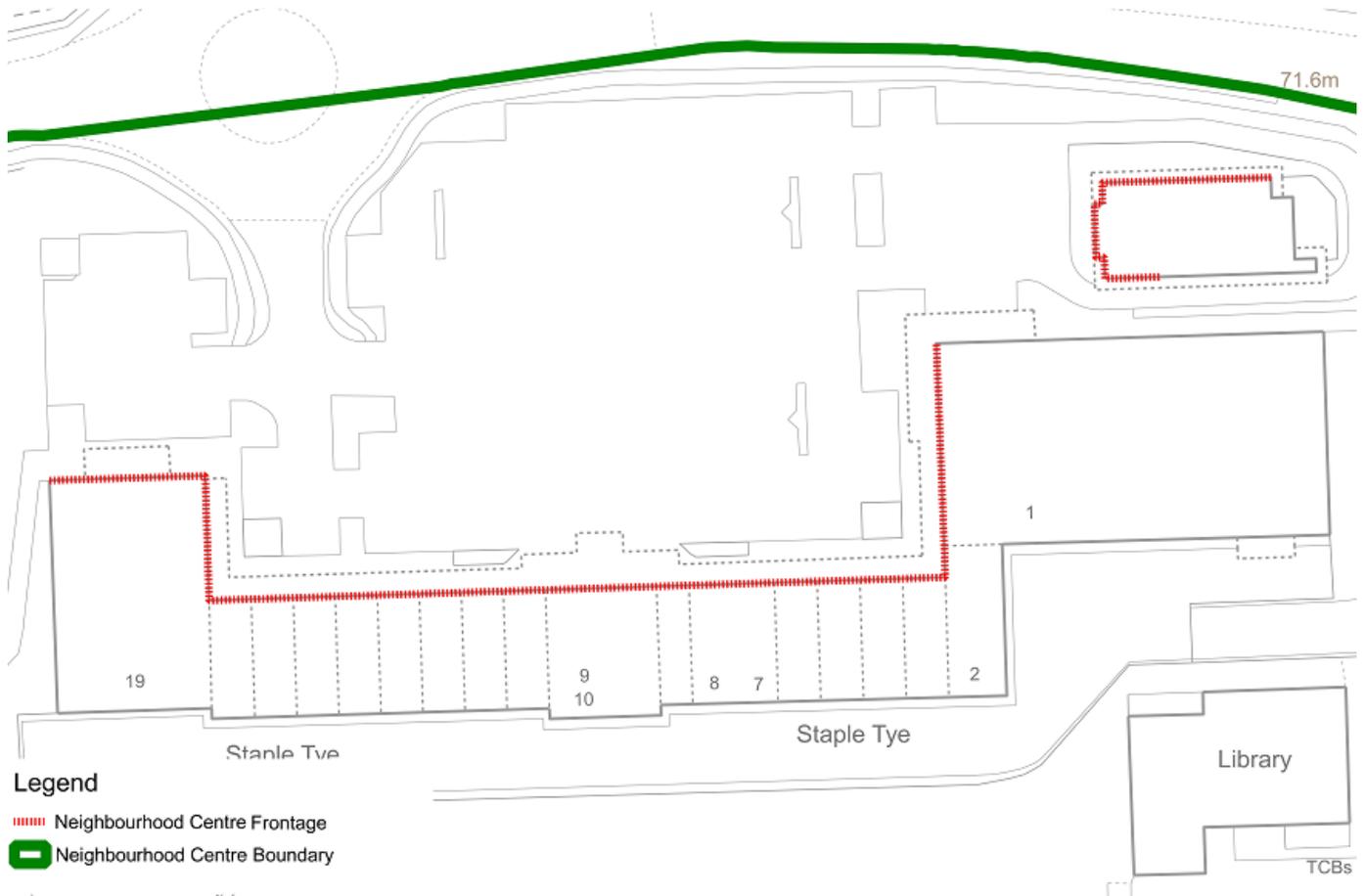
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Old Harlow Neighbourhood Centre - Frontages



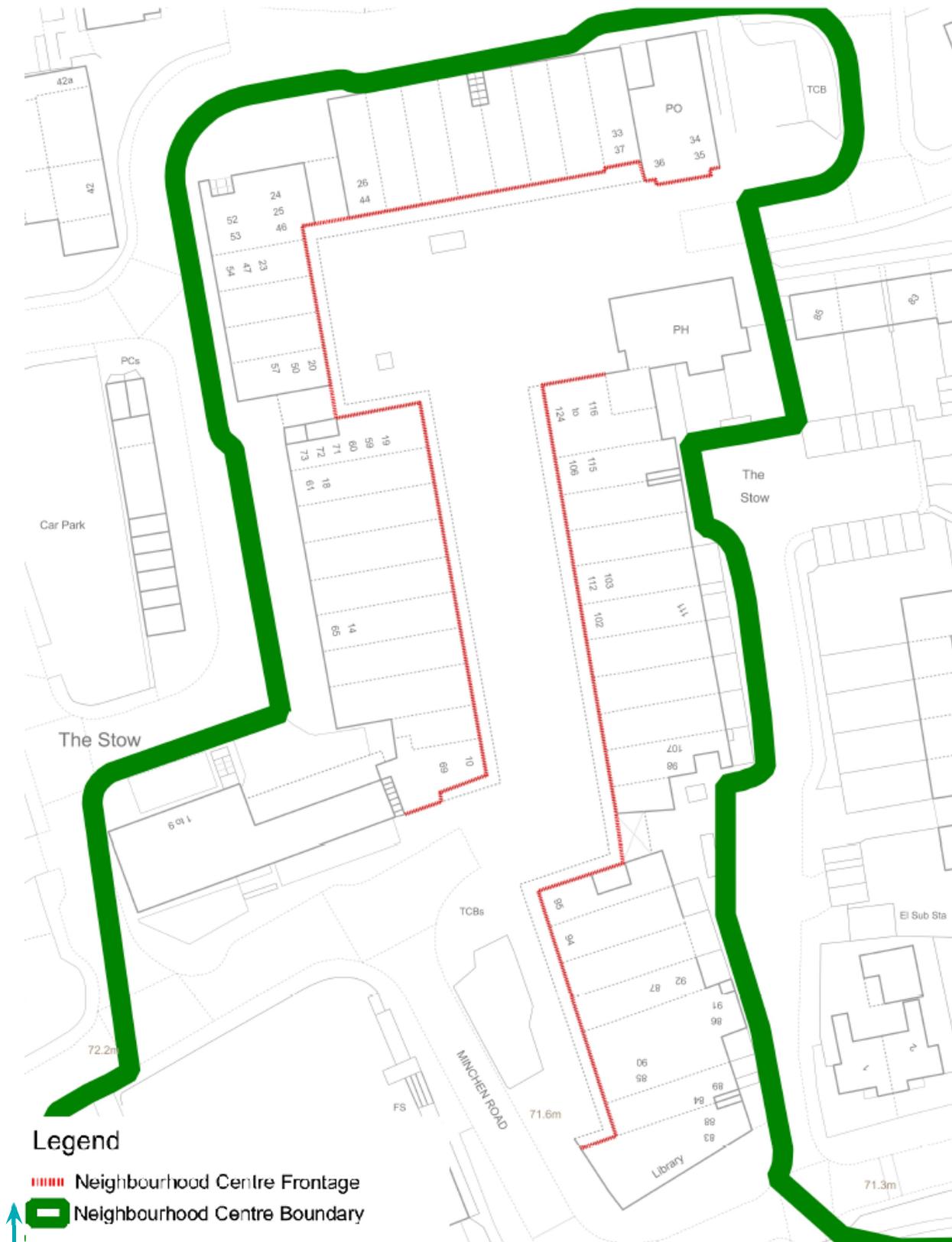
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Staple Tye Neighbourhood Centre - Frontages



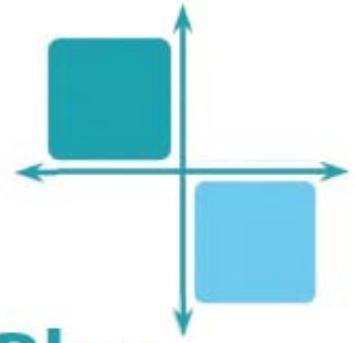
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The Stow Neighbourhood Centre - Frontages



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Harlow

Local Development Plan

Pre-Submission Publication



Designed and produced by
Harlow Council

Harlow Local Development Plan

Regulation 22 Consultation Statement

Prepared to meet the requirements of Regulations 18, 19 and 22 (1) Part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

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1. Introduction

1.1 This Consultation Statement explains the stages and processes undertaken by Harlow Council during the preparation of the Harlow Local Development Plan (the Local Plan). In particular it explains how the Council engaged with the local community and other stakeholders within and beyond Harlow to ensure their views were taken into consideration, in order to help shape the Local Plan. It also indicates how the main issues raised through consultation have helped to shape the policies and proposals that are set out in the Local Plan.

1.2 Since the preparation of the Local Plan formally commenced in 2007 a number of consultation exercises were undertaken to help inform the Plan. Over time these were shaped by emerging technical evidence to ensure the socio-economic and environmental characteristics of Harlow were taken into consideration. These are outlined in more detail in subsequent sections of this statement.

1.3 This Regulation 22 Consultation Statement has been prepared to fulfil the requirements of Regulations 18, 19 and 22 (1) Part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is intended that the Statement will demonstrate to the Inspector at the Examination in Public that the processes undertaken by the Council, leading to Submission of the Local Plan, had regard to Government guidance and the requirements set out in the relevant legislation in respect of public consultation.

1.4 Regulation 22 (1) Part (c) of the above Regulations outlines the scope of the Statement which sets out the following:

i. which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations;

ii. how those bodies were invited to make representations;

iii. a summary of the main issues raised in those representations;

iv. how those main issues have been taken into account;

v. if there are representations made under Regulation 20, the number made and a summary of the main issues made in those representations; and

vi. if there are no representations made under Regulation 20, that no such representations were made.

1.5 All key stages of the consultations undertaken by the Council during the preparation of the Local Plan are set out below:

- Initial frontloading undertaken by the Council between 2007 and 2009 in order to raise awareness about the new Local Development Plan, to scope issues and to explain the plan making process.

- The Core Strategy Issues and Options consultation document, undertaken between 22 November 2010 and 28 January 2011, which set out the key issues affecting Harlow together with potential options for planning the town's future, and a series of policy themes and approaches.
- The Emerging Strategy and Further Options consultation, undertaken between 14 April 2014 and 30 May 2014, considered further the matters in the previous consultation but in addition presented five spatial options of how the identified development needs could be accommodated within Harlow.
- The Development Management Policies document consultation was undertaken between 20 July 2017 and 7 September 2017. The policies set in this document underpinned the overarching policy themes considered previously and were developed to provide the detailed spatial expression of the Strategic Policies in the emerging Local Plan.
- In May 2018 the Council published the Pre-Submission Publication of the Local Plan. The period for the receipt of representations concluded 6 July 2018. This represents the complete Harlow Local Development Plan and it is considered, provides a strategy and spatial vision to deliver growth in Harlow up to 2033. This, therefore, was the final version of the Local Plan for consultation that the Council intends to submit for examination.

1.6 As well as having regard to the requirements of the Regulations referred to above, the Council has also undertaken public consultation and engagement in accordance with the provisions of the Council's adopted Statement of Community Involvement 2014. The Statement of Community Involvement (SCI) sets out how and when Harlow Council will consult with the local community regarding the preparation of planning policies and the determining of planning applications. Following national changes to the planning system, the Council reviewed the original SCI (adopted in 2007) and consulted on a draft SCI Review. The SCI Review was then finalised and subsequently adopted at Full Council on 18 September 2014.

1.7 The Council also considers that the necessary legal and procedural processes have been undertaken throughout the preparation of the Local Plan. A Legal Compliance Checklist is being published separately, as part of the Local Plan Submission.

1.8 All the comments received at each stage of consultation can be viewed in full on the Council's website at www.harlow.gov.uk/local-plan

1.9 Details of the documents to accompany the submission of the Local Plan are also available at the link above.

2. Who we consulted

2.1 The Council has consulted extensively at all stages of preparing the Local Plan, to encourage the maximum level of feedback from the public, key stakeholders and other organisations.

2.2 At each stage, the bodies the Council consulted has included:

- East Hertfordshire District Council
- Epping Forest District Council
- Uttlesford District Council
- Essex County Council (the Highway and Minerals and Waste Authority)
- Hertfordshire County Council
- Highways England
- Homes England (previously known as Homes and Communities Agency)
- NHS West Essex Clinical Commissioning Group
- The Environment Agency
- Historic England
- Natural England
- Princess Alexandra Hospital

2.3 To aid the consultation process, the Council maintains a consultee database (hosted by JDi) which is continuously updated. At the time of the consultation there were approximately 3,000 consultees on the database.

2.4 A list of the bodies who responded to the consultations is available in the Appendices.

3. How we consulted

3.1 The Council undertook extensive consultation on a range of documents throughout the preparation of the Harlow Local Development Plan (Local Plan). The consultation process and the relevant documents leading up to submission of the Local Plan are set out below.

3.2 Initial frontloading was undertaken by the Council between 2007 and 2009.

Initial frontloading

Harlow Council began its initial frontloading consultation work to inform the preparation of the Local Plan by holding an exhibition at the Harlow Town Show in September 2007. The objective was to raise awareness of the then Local Development Framework (LDF) process and questionnaires were distributed across the town to find out what Harlow residents wanted for the future of the town.

In 2008 Harlow Renaissance and Harlow 2020 organised a joint LDF workshop to provide input to Harlow Council in its development of its new development plan. From this some shared aspirations were identified to help shape the Core Strategy and the issues and options stage of the LDF.

Following on from this two workshop events were held by Harlow Council in June and July 2009 for Harlow Council Officers and Members respectively. The aim was to raise awareness of Harlow's LDF Core Strategy and to gather from members and officers information on existing and emerging issues to underpin the LDF.

Two subsequent informal workshops were held on 8 and 13 October 2009 for the benefit of 'community' and 'key sector' stakeholders to raise awareness about the emerging development plan. This was to ensure that stakeholders, including the public, were engaged in the process and that their views on the key issues affecting Harlow and potential options for addressing them were taken into consideration. This was followed by a presentation to the Harlow Youth Council in December 2009 to ensure young people played a part in shaping the future of the district.

The purpose of these activities was to help inform the development of a Core Strategy that would set out the strategic planning framework for Harlow that would replace the existing Adopted Replacement Harlow Local Plan 2006.

3.3 The Core Strategy Issues and Options consultation document, with consultation being undertaken between 22 November 2010 and 28 January 2011.

The Core Strategy Issues and Options consultation

This document was prepared against the backdrop to the changes being made to the plan making system by Government that saw the abolition of Regional Plans. Notwithstanding these changes and the resultant uncertainties that arose, Harlow Council wished to continue to make progress in preparing a new Local Plan for the district. This was in order to replace the Adopted Harlow Replacement Local Plan July 2006. Through the preparation of Community and Corporate Plans the Council recognised that there continued to be a need to provide new homes and employment opportunities in the district to meet community

aspirations and regenerate the town, together with the provision of key infrastructure, balanced against the need to protect environmental assets. During this consultation a number of themes, strategic objectives and policy approaches were developed and considered and issues arising from emerging evidence were identified for public comment. Emerging issues were articulated through a series of questions.

3.4 The Emerging Strategy and Further Options consultation was undertaken between 14 April 2014 and 30 May 2014.

Emerging Strategy and Further Options consultation

Based on the themes, strategic objectives and policy approaches already set out in the Issues and Options document, and the subsequent changes to the plan making system arising from the Localism Act 2011, this consultation set out options for growth based on the emerging technical evidence. This document explained how the emerging spatial strategy has been developed and how, in the light of the abolition of Regional Plans, the responsibility of identifying development needs rests with local planning authorities. It reflected on and quantified the amount of development required in Harlow, including the amount of housing and employment needed, emerging from a joint Strategic Housing Market Assessment and other related work being prepared under the new Duty to Co-operate. Arising from this work five alternative patterns of development to accommodate the level of growth needed were identified and consulted upon.

3.5 The Development Management Policies document consultation was undertaken between 20 July 2017 and 7 September 2017.

Development Management Policies consultation

This consultation presented a set of Development Management policies that would be set out in the Local Plan which would provide a more detailed planning framework that could be used to determine planning applications. They were informed by previous consultations and national policies and guidance that was set out the Government's planning policies for England and how it expects them to be applied. The Development Management policies have been developed to help achieve sustainable development and to provide the detailed spatial expression of the themes and strategic objectives that underpin the Local Plan.

3.6 Commencing in May 2018 the Council published the Pre-Submission Publication version of the Local Plan. The consultation period concluded 6 July 2018.

Pre-Submission Publication Harlow Local Development Plan

This is the final version of the Harlow Local Development Plan that the Council intends to submit for formal examination. This includes the Local Plan Document and the supporting Policies Map. 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 that ensure future development is sustainable by meeting the needs of residents, businesses and visitors, while providing the required infrastructure and protecting environmental assets.

Planning applications will be decided against the Local Plan policies.

The Policies Map, which maps the planning policies and proposals across Harlow, accompanies the Local Plan, along with other documents such as the Sustainability Appraisal and Infrastructure Delivery Plan. The policies in the Local Plan are justified by an Evidence Base, which includes studies such as the SHMA and the Green Belt Review and Green Wedge Review.

A separate Area Action Plan is being prepared for Harlow Town Centre in order to address specific regeneration issues and to enhance its retail function.

3.7 Copies of consultation material are included within the appendices and were supported by press notices, press releases and articles in the media and are summarised below:

- Statutory notices (list and dates)
- Articles in Harlow Star, Your Harlow (web based news) Harlow Times and Essex Life (web based Harlow Star)
- Press releases issued by the Council (list and dates)

3.8 In addition, Officers attended and gave presentations to a number of meetings with external bodies over the period the Plan has been in preparation, including:

- the Harlow Civic Society,
- Essex County Council managers group,
- the annual meeting of the Churchgate Residents Association ,
- the Harlow Youth Council

4. How we responded

4.1 The Council acknowledges that Government Guidance indicates that Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Throughout the course of the preparation of the new Local Development Plan for Harlow, the Council has undertaken ongoing consultation and engagement with the local community, businesses and other organisations and bodies to underpin the themes, objectives and policy approaches that have been developed. This has been an iterative process, acknowledging that the need for growth, identified through objective technical evidence, can be challenging for communities to support. This is especially so as Harlow has tight administrative boundaries that have limited the spatial options available.

4.2 Matters raised throughout the various consultation stages during the preparation of the Local Plan have been considered by elected Councillors at a series of Local Development Plan Panel (formerly Local Development Framework Meetings) and Cabinet meetings, and where necessary meetings of the Full Council. This has included the consideration of a suite of technical evidence base documents prepared to identify the socio-economic and environmental conditions of Harlow in order to develop an appropriate strategic and policy approach supported by specific policy proposals.

4.3 In addition, and in accordance with the requirements of the Duty to Co-operate, Councillors and officers of the Council have worked closely with colleagues at East Hertfordshire, Epping Forest and Uttlesford District Council, together with Essex and Hertfordshire County Councils, through the Co-operation for Sustainable Development Board. This has provided a focused forum to ensure that cross boundary strategic issues were considered and that matters raised through the consultations on their respective Local Plans could be addressed. This has culminated in the signing of a series of joint Memos of Understanding and agreement on a joint policy framework to be included in their respective Local Plans for the strategic sites being promoted around Harlow.

Initial frontloading

4.4 Arising from the initial engagement exercises undertaken by the Council between 2007 and 2009 to scope out key planning issues, and which involved the participation of the public, community and key sector stakeholders, youth representatives and council members, a number of matters were identified. This included the need to

- protect and maintain Harlow's green spaces
- provide more affordable housing for key workers and vulnerable groups
- enhance education, training and skills for Harlow people
- enhance the retail mix in the town centre and shopping areas
- alleviate traffic congestion on A414 and on local roads
- provide adequate parking in housing areas
- provide more recreation facilities for young people

4.5 In addition to the above and having regard to the requirements set out in Government guidance the Council continued to update its technical evidence base in order to identify and consider the socio-economic and environmental characteristics of Harlow. These studies

identified the emerging housing, employment and infrastructure needs for Harlow and across the wider area. Some had been prepared jointly with adjoining local authorities reflecting the Harlow areas identification as a location for strategic growth in the East of England Plan.

4.6 Consequently all these elements helped to inform the initial stages of the preparation of new development plan for Harlow and provided the basis to identify a number of themes within which issues could be considered and appropriate policies developed.

The Core Strategy Issues and Options consultation

4.7 Following the initial frontloading exercises, and the emerging technical evidence, the Council prepared the Core Strategy Issues and Options consultation document. This was prepared against the backdrop of the changes being made by Government to the planning system but reflected the Council's desire to continue to make progress in the preparation of new local development plan. This set out a spatial portrait for Harlow, explained the relationship with other plans and strategies and identified the planning challenges. It also presented a spatial vision together with themes, objectives and policy approaches to address the emerging issues. Finally, and taking into account Harlow's tight administrative boundaries, a number of spatial options were proposed that could help meet emerging development needs. These were acknowledged as being based on the growth requirements set out in the former East of England Plan but which the Council considered as being relevant to test against the backdrop of the emerging technical evidence.

4.8 In response to this consultation 1,913 representations were received in total. The key matters raised are summarised as follows:

- there was general support for the themes set out in the document
- the objectives set out should be fully funded
- the level and validity of growth related to the East Of England Plan was challenged
- there was general support for the protection of the town's open spaces and natural landscapes, prioritising protection of the Green Wedges over that of the Green Belt
- a range of infrastructure improvements will be necessary before any further significant growth takes place in Harlow including improved access to the M11
- improvements required to the cycle network, bus links and Harlow bus and railway stations
- need for a Water Cycle Study and a Strategic Flood Risk Assessment
- incorporating SuDS in new development.
- existing traffic congestion and parking need to be addressed
- new development should conform to the Gibberd Masterplan
- overall support for meeting local housing needs, but not for the level of growth set out in the East of England Plan
- the link between growth securing regeneration had not been proven
- preference should be given to maximising the use of previously developed land
- the quality of the town's employment areas should be improved
- there was support from respondents for maintaining the existing shopping hierarchy in Harlow, with the Town Centre retained as the main focus for retail development and restricting any further expansion of the retail offer at Edinburgh Way

- there was concern about growth taking place to the north of Harlow and the effect this would have on Hunsdon and Gilston
- some challenged the methodology used by the consultants to identify the potential spatial options

4.9 More detail on the comments received is set out in the Core Strategy Issues and Options Summary Report (February 2012). The comments received at this time reflected some of the spatial planning challenges facing Harlow, such as the tight administrative boundaries, which effectively limited development options. Options for delivering the growth needed, as identified in the emerging evidence, was predicated by the need to secure positive outcomes through the emerging Duty to Cooperate, as set out in the Localism Act 2011.

4.10As the Local Plan progressed, the Council continued to work with key stakeholders and partners to develop policies and proposals that both reflected the emerging technical evidence and the observations of respondents to consultations. This assumed greater impetus through the obligations of the Duty to Cooperate that resulted in the commissioning of joint evidence base documents with other Councils, including joint demographic studies, a SHMA and FEMA as well as the consideration of transport issues. Other Harlow focused work included the Harlow Future Prospects Study (2013).

4.11 In addition the general issues raised were considered by the Council and against the findings of the emerging evidence to ensure that appropriate policies were developed and that these also had regard to the requirements set out in Government guidance and best practice.

Emerging Strategy and Further Options consultation

4.12 The Emerging Strategy and Further Options consultation, undertaken between 14 April 2014 and 30 May 2014, considered further the matters in the previous consultation but in addition presented five spatial options for comment on how the identified development needs could be accommodated within Harlow. This focused on the housing and employment requirements for Harlow and how this be accommodated based on the emerging joint evidence that was being prepared through the Duty to Cooperate including Essex wide work on demographics to assist in the preparation of SHMA's, and a joint SHMA prepared on behalf of Broxbourne, East Hertfordshire, Epping Forest, Uttlesford and Harlow Councils.

4.13 In response to this consultation 117 representations were received, including a petition containing 1,846 signatures from the STOP Harlow North campaign. The key matters raised are summarised as follows

- the levels of growth proposed are excessive and unsustainable
- there should be a higher target for housing and jobs
- more affordable housing is required to deliver regeneration
- there is a lack of infrastructure
- there were varying levels of support for the spatial options proposed
- development to the east of Harlow could deliver a new junction on the M11
- the town's distinctive character is not being protected
- enhancement of public transport and infrastructure is needed

- concern about the loss of Green Belt
- there would be increased traffic congestion and pollution in the south of the town
- new development should be actively and physically linked to Harlow
- development to the west of the town could aid regeneration of Pinnacles and Katherines
- high quality transport links will be required
- development north of Harlow would be close to Harlow rail station
- the technical and financial viability of the northern bypass was questioned
- a blend of options would be more sustainable
- preferred options will depend on the outcomes of the Duty to Cooperate

4.14 More detail on the comments received is set out in the Emerging Strategy and Further Options Consultation Summary Report (December 2014). Following this consultation the joint work being undertaken through the Duty to Cooperate intensified in order to confirm the development requirements for Harlow and the wider area and the most sustainable spatial options, through the preparation of the Harlow Strategic Site Assessment (2016), the Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire HMA (2016), an updated SHMA (2017) and Affordable Housing Update (2017) and West Essex and East Hertfordshire Assessment of Employment Needs (2017). In addition an updated Gypsy and Traveller Study to acknowledge the new Traveller definition was prepared.

4.15 In addition, Harlow specific evidence, including the Open Space and Green Infrastructure Study (2013), the Employment Land Review (2013), the Green Wedge Review (2014) and the Green Belt Review (2016), was prepared.

4.16 As updated evidence emerged, the general issues raised during the consultation were considered by the Council to ensure that the emerging policies were reasonable, justified and appropriate and that these also had regard to the requirements set out in Government guidance and best practice.

Development Management Policies consultation

4.17 In order to ensure that a detailed planning framework was contained in the Local Plan to underpin the strategic policies, and which would be used to determine planning applications, the Council decided to undertake a consultation on a suite of Development Management Policies. This consultation was undertaken between 20 July 2017 and 7 September 2017.

4.18 In response to this consultation 195 representations were received. The policies set out in the document were generally supported and some suggested a number of minor amendments, but other matters raised are summarised below:

- there is a need for improvements to the highway network including passenger network as well as reference to the needs of equestrians
- some of the evidence base is out of date
- the Gibberd principles should continue to apply
- policies should refer to the need for compensatory measures where appropriate
- policies should not duplicate Building Regulations
- Green Wedge and Finger policies should be more flexible to allow specific uses

- policies should encourage the provision of bungalows
- the viability of the policies should be assessed
- a district wide Article 4 Direction is needed to address HMOs
- concern about the requirement for the provision of self-build plots
- A5 uses in retail areas close to schools could fuel childhood obesity
- contributions for strategic infrastructure should apply to all sites
- an updated Infrastructure Delivery Plan will need to be prepared

4.19 The comments made in respect of the consultation on the Development Management Policies document were considered by officers and members and, taking account of updated technical documents, work continued on the preparation of the Pre-Submission Publication version of the Harlow Local Development Plan. This also took into account the outcomes of the Duty to Cooperate and in particular the agreements reached at the Co-operation for Sustainable Development Board. This included the signing of a number of MOU's in respect of the Objectively Assessed Housing Need, employment provision and distribution, transport needs and need to mitigate the impact of growth on the Epping Forest SAC, which have also helped to shape policies in the emerging Local Plan.

4.20 In addition work was progressing on developing an approach to bring forward the Harlow and Gilston Garden Town, arising out of agreements reached at the recently constituted Garden Town Board. This included the agreement of joint strategic policies for inclusion in the emerging Local Plans in the area, in order to secure a co-ordinated approach, in the delivery of the agreed housing distribution.

Pre-Submission Publication Harlow Local Development Plan

4.21 All the comments received throughout the preparation of the Local Plan were taken into consideration by the Council during the preparation of the Pre-Submission Publication version of the Local Plan that the Council now intends to submit to the Secretary of State, for Examination. This document was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), on 24 May 2018 until 6 July 2018. This Publication period included an exercise to notify organisations and individuals on the Local Plan consultation database, reflecting the provisions of the Council's Adopted Statement of Community Involvement and national legislation.

4.22 In response to this 72 representations were received making 165 comments which are set out in the appendices. Arising, however, from observations made to the Publication version a Schedule of Minor Modifications has been prepared to submit with the Local Plan to provide the Inspector, if minded to accept, with the most up-to-date policy position. These will address minor issues that have been raised in the submitted representations, as well as the matters that will be agreed through emerging Statements of Common Ground, together with other minor changes to ensure clarity and consistency, and which will not affect the soundness of the Local Plan.

Town and Country Planning (Local Planning) (England) Regulations 2012 Regulations 18 to 22

Preparation of a local plan

18.—(1) A local planning authority must—

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

Publication of a local plan

19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

Representations relating to a local plan

20.—(1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.

Submission of documents and information to the Secretary of State

22.

(1) The documents prescribed for the purposes of section 20(3) of the Act are—

- (a) the sustainability appraisal report;
- (b) a submission policies map if the adoption of the local plan would result in changes to the adopted policies map;
- (c) a statement setting out—
 - (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
 - (ii) how those bodies and persons were invited to make representations under Regulation 18,

- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv) how any representations made pursuant to regulation 18 have been taken into account;
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made in regulation 20, that no such representations were made;
- (d) copies of any representations made in accordance with regulation 20; and
- (e) such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.

(2) Notwithstanding regulation 3(1), each of the documents referred to in paragraph (1) must be sent in paper form and a copy sent electronically.

(3) As soon as reasonably practicable after a local planning authority submit a local plan to the Secretary of State they must—

(a) make available in accordance with regulation 35—

(i) a copy of the local plan;

(ii) a copy of each of the documents referred to in paragraph (1)(a), (b) and (c);

(iii) any of the documents referred to in paragraph (1)(d) or (e) which it is practicable to so make available, and

(iv) a statement of the fact that the documents referred to in sub-paragraphs (i) to (iii) are available for inspection and of the places and times at which they can be inspected;

(b) send to each of the general consultation bodies and each of the specific consultation bodies which were invited to make representations under regulation 18(1), notification that the documents referred to in paragraphs (a)(i) to (iii) are available for inspection and of the places and times at which they can be inspected; and

(c) give notice to those persons who requested to be notified of the submission of the local plan to the Secretary of State that it has been so submitted.

List of Respondents

FIRST NAME	MIDDLE NAME	SURNAME	COMPANY/ORGANISATION	PERSON ID
Ernesto		Abad		[6282]
Sarah		Abbott		[6510]
Terry		Abel		[6159]
Ben		Acheson		[6908]
Tim		Acheson		[6523]
Mark		Adams		[6839]
Beyrl		Adams		[6639]
J		Agate		[6579]
William		Aitken		[6441]
Jeremy		Aknai		[6105]
Peter		Aknai		[5987]
Sally		Aknai		[6414]
Richard		Allanach		[5791]
David		Allard		[6592]
Elaine		Allen		[6031]
Michael		Allen		[6172]
Stan		Allen		[5775]
Dominic		Allington-Smith		[7140]
Dean		Amor		[6375]
Bobby		Anderson		[7287]
Gary		Anderson		[7414]
John		Anderson		[7509]
Daniel		Andrews		[7073]
Maureen		Annetts		[6828]
Edward		Anthony		[6074]
Tina		Arden		[6973]
Warren		Arden		[6971]
Jame		Argent		[7492]
John		Argent		[6116]
Carol		Arnesen		[5915]
Vince		Arrowsmith		[6489]
Sue		Ash		[6953]
Lorraine		Ashall		[7356]
Rod		Ashall		[7352]
Sheila		Ashall		[7353]
Brenda		Ashley		[7482]
John		Ashley		[7480]
Roy		Atkins		[7379]
Suzanne		Atkins		[7416]
Liz		Atkinson		[7580]
Irene		Auerbach		[6897]
Gary		Austin		[7203]
P	N	Austin		[6188]
Steve		Avis		[7339]
Anna		Avis		[5956]
Karen		Backshall		[7503]
Paul		Backshall		[7508]
Mrs		Bacon		[6472]
Jane		Badrock		[6992]
Sarah		Bagnall		[7079]
Alyson		Bailey		[6909]
Bob		Bailey		[6581]
Eliot		Bailey		[6481]
T		Bailey		[6552]
Helen		Bailey		[6873]
Willow		Bailey		[6480]

Glen	Baker		[6921]
Mark	Baker		[7053]
Lucy	Baker		[7592]
Sarahjayne	Baker		[6970]
Colette	Balch		[6260]
Trevor	Bale		[7456]
Janet	Ballard	Roydon Parish Council	[5434]
Derek	Bandy		[6673]
Irene	Bannister		[6708]
Steven	Barker	H C Leach	[7665]
Ellen	Barker		[7341]
S	Barker		[7263]
Robert	Barker		[6979]
Tim	Barnard		[6810]
Teresa	Barnard		[6216]
Les	Barnes		[6879]
Rod	Barnes		[6719]
M	Barnes		[6717]
Melanie	Barnes		[6351]
Veronica	Barnes		[6878]
John &	Barnes		[5828]
Jane	Barnett	Briggens Estate	[7651]
David	Barnett		[6377]
Laurie	Barnett		[6386]
Paul	Barnett		[5993]
Ronald	Barnett		[7065]
Victoria	Barnett		[6535]
Irene	Barrall		[6152]
Roger	Barratt		[7074]
Andrew	Barrett		[6539]
Jane	Barrett		[6538]
Mag	Barrett		[5857]
Joanna	Barter		[5701]
Nicholas	Barter		[6408]
Gillian	Bassett		[5921]
John	Bassett		[5920]
Gillian	Baxter		[7078]
Darren	Beardon		[6910]
Catherine	Beaujeux		[5976]
Peter	Beaumont		[7286]
A	Bebee		[6624]
Michael	Beckman		[6488]
Claire	Beckmann		[7080]
Ed	Beckmann		[6738]
Ray	Beddoes		[5970]
Roger	Beeching		[7398]
L	Bell		[7018]
Anthony	Bellotti		[7048]
Sandra	Bellotti		[7047]
E	Belsey		[6780]
Mark	Bennet	St James Church	[470]
Jenny	Bennett		[6204]
Maureen	Bennett		[7166]
M	Bennett		[6975]
Tony	Bennett		[6675]
Michael	Bentley		[6707]
R	Best		[7237]
T	Best		[7240]
B	Beverley		[6039]
B	Beverley		[6038]

Tina		Bewley	[6376]
Robyn		Bewsey-Holden	[7150]
Peter		Bickley	[6194]
Evan		Bickmore	[7345]
Grace		Bickmore	[7064]
Lucy		Bickmore	[7554]
David		Bindefeld	[7530]
P		Bindefeld	[6611]
William		Bird	[5083]
C		Black	[5995]
Jennifer		Black	[6114]
Jayne		Black	[6856]
Andrew		Blackwell	Barratt Strategic [7662]
David		Blake	[7606]
Max		Blakeman	[6620]
Hilary		Blease	[6803]
Trevor		Blease	[7322]
Mark		Bloss	[7085]
Claire		Bloss	[6395]
M		Blundell	[7419]
Catherine		Boaden	[6235]
A		Bond	[6280]
J		Bond	[6281]
Barbara		Borowski	[7524]
John		Borowski	[7523]
Lino		Bottalico	[6871]
Eve		Bottalico	[6258]
Oonagh		Bottalico	[6259]
Tracy		Bottalico	[6872]
Frances		Boul	[7264]
Francine		Bourgeois	[7027]
Steve		Bourne	[7481]
Vanessa		Bowerman	[6294]
Linda		Bowes	[5881]
Peter		Bowes	[6167]
Stuart		Bowman	[7169]
Richard		Bowran	Sawbridgeworth Town Council [4945]
		Boxford-	
Veronica		Brookes	[7215]
G		Brace	[6341]
Frederick	David	Bracey	[5882]
Robert		Bramich	[6181]
Andrew		Bramidge	Harlow Renaissance [259]
D		Brand	[6344]
C		Brentnall	[6563]
Giles		Brentnall	[6268]
Ian		Brett	[7490]
Virginia		Brett	[7489]
Leslie		Brewster	[6299]
Pauline		Brewster	[6298]
Jean		Brian	[6838]
Stephen		Brickwood	[7569]
Susan		Brickwood	[7586]
Richard		Brickwood	[7458]
Moir		Bridge	[6400]
Colin		Bridgeman	[6572]
Gina		Bridgman	[7271]
Chris		Bridle	[7305]
Geoff		Bridle	[7302]
Jeff		Bridle	[7304]

Paul	Bridle	[7309]
Zoe	Bridle	[7303]
Neil	Bridle	[6584]
Sue	Bridle	[6548]
Linda	Brierly	[7030]
Bob	Bright	[6516]
Ian	Brinham	[6347]
Lilian	Brinham	[6278]
G	Brinkley	[6804]
B	Brinkley	[7447]
V	Brinkley	[7448]
Brenda	Brinn	[7351]
Tomy	Brinn	[7393]
A	Brix	[6781]
Nicola	Brockington	[7052]
Michael	Brookes	[6596]
Ann	Brookfield	[6556]
Canan	Brown	[7025]
Douglas	Brown	[5052]
Joyce	Brown	[6930]
Michael	Brown	[5764]
Terence	Brown	[6297]
Val	Brown	[5961]
N	Brown	[6807]
Nicola	Brown	[6271]
Paul	Brown	[6269]
S	Brown	[7504]
Terry	Brown	[6739]
Anita	Brummit	[6063]
Gerald	Brummitt	[6066]
Frankie	Brunker	[7099]
Mark	Brunker	[7100]
Chris	Brunton	[6497]
Liam	Bryant	[6071]
Sharon	Bryant	[6623]
Janine	Bryant	[6070]
Lucy	Buckland	[7453]
Josh	Buckland	[7452]
K	Buckland	[7451]
Andrew	Buckle	[6364]
Ann	Buckle	[5964]
Eric	Buckmaster	[6373]
Francesca	Buckmaster	[6379]
Louisa	Buckmaster	[6374]
Ruth	Buckmaster	[6378]
Helen	Buckworth	[6590]
Nick	Buckworth	[6263]
Teresa	Bulloch	[7042]
Barbara	Burge	[5093]
Alan	Burgess	[26]
Anthony	Burgess	[7312]
Mark	Burgess	[6869]
Clare	Burkett	[6469]
Wayne	Burlingham	[7578]
Mr	Burnay	[7210]
Ria	Burns	[6212]
Andrew	Burtenshaw	[6368]
Gerald	Burtenshaw	[6072]
Dawn	Burtenshaw	[6068]
Keely	Burtenshaw	[7609]

Protection of Roydon Area PORA

Keith		Busby		[6240]
Thomas		Busby		[6844]
Marion		Busby		[6848]
D	C	Butler		[7574]
Emily		Butler		[7438]
Jack		Butler		[7437]
Paul		Butler		[5951]
Deanna		Butler		[6799]
Phil		Butler		[6507]
Steven		Butler		[5053]
Kevin		Butters		[6894]
Carol		Butters		[6887]
Henrietta		Buxton		[7167]
David		Buxton		[6380]
Nicholas		Buxton		[7555]
Fiona		Byatt		[6898]
Michael		Byatt		[6254]
Pat		Byatt		[6937]
Tony		Byatt		[7526]
Ed		Byrch		[6536]
Adam		Byrne		[6821]
Paul		Caddick		[6462]
Amanda		Cadisch		[6820]
Michael		Cairns		[6938]
Colin		Campbell	C. J. Pryor (Plant) Ltd	[7645]
Anthony		Camplin		[6648]
Sarah		Camplin		[7347]
Isabelle		Carr		[7326]
Catherine		Carrdus		[6628]
Jane		Carrington		[6011]
Sheila		Carroll		[5765]
Christian		Carruth		[6949]
Helen		Carruth		[6968]
Alyson		Carter		[7529]
David		Carter		[7229]
Janet		Carter		[7230]
Ben		Carter		[6099]
Lilli-May		Carter		[6044]
Sarah		Carter		[6499]
B		Carthy		[7086]
Chris		Carthy		[6059]
Rob		Carthy		[6054]
Tim		Carthy		[6055]
Jackie		Carthy		[6049]
Matthew		Cartmell		[6530]
Alexis		Casey		[6812]
James		Casey		[7151]
K		Casey		[7241]
C		Casey		[7187]
I		Casey		[7186]
Mr		Cash		[6079]
Mrs		Cash		[6080]
Thomas	& Audrey	Castle		[6191]
Hugh		Cater		[6425]
M		Cavalier	Cavalier Land Co	[5717]
P		Chad		[7116]
Peggy		Chad		[6762]
David		Chalk		[5889]
Margaret		Chalk		[7666]
Mike		Chapman		[6852]

The		Chapman's	[5824]
Brian		Chappell	[6994]
Chris		Chappell	[6954]
Chris		Chappell	[6995]
Jack		Chappell	[6996]
Tina		Chappell	[6075]
Michael		Charles	[5929]
Janet		Cheek	[7525]
Ray		Cherry	[6962]
Karen		Cherry	[6960]
Martin		Chown	[5853]
N		Chrimes	[6433]
Brenda		Church	[6346]
David		Clapham	[6834]
Nigel		Clark	[25]
Amy		Clark	[7207]
Derek		Clark	[5065]
Michael		Clark	[7540]
Eileen		Clark	[6950]
Kate		Clark	[7545]
Michael		Clark	[6663]
Peter		Clark	[6613]
Brian	& Barbara	Clark	[5820]
Andrew		Clark	[6487]
Phil		Clark	[6436]
T		Clark	[7289]
Judith		Clark	[7397]
M		Clark	[7288]
Karen		Clark	[6435]
Paul		Clark	[6922]
Rachel		Clark	[6512]
Sam		Clark	[5722]
Matt		Clarke	[7653]
David		Clarke	[6522]
John		Clarke	[6694]
Kim		Clarke	[6028]
Les		Clarke	[6388]
Ena		Clarke	[6389]
Lara		Clarke	[6223]
Sue		Clarke	[6746]
Cynthia		Clarkson	[6102]
Vanessa		Clay	[5969]
David		Clee	[7270]
Marianne		Clee	[5983]
Christopher		Clemmett	[5721]
Janet		Clemmett	[5874]
Michael		Clemmett	[6022]
Dean		Clemmett	[6027]
Brian		Clenshaw	[6458]
Philip		Clewes-Garner	[7020]
George		Clifton	[7015]
James		Clifton	[7556]
Revd		Clive	[7577]
J		Cobby	[6861]
Charles		Cochrane	[5891]
Paul		Cochrane	[6355]
Adrian		Coggins	[5845]
Dave		Coghill	[7246]
Debbie		Cole	[6196]
Ann		Coliings	[6653]

RGW Cherry & Associates

Stop Harlow North

Barrat Strategic Persimmon & Taylor Wimpey

MRB Services Ltd

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NHS West Essex

Andrew	Colley	[6942]
John	Collier	[6457]
Joyce	Collins	[6127]
Inga	Collins	[6125]
Jean	Collins	[6005]
John	Collins	[6006]
Ken	Collins	[6126]
Lisa	Collins	[5836]
Mary	Collins	[5925]
J	Collins	[7357]
Nicola	Collinson	[6057]
Rod	Colwell	[7493]
Kim	Compton	[7127]
A	Connolly	[5907]
Barry	Cook	[7242]
Steve	Cook	[6252]
Sophie	Cooke	[6085]
Michael	Cooksey	[6983]
Charmaine	Cooper	[7220]
Colin	Cooper	[7219]
David	Cooper	[6607]
Derek	Cooper	[6969]
Giles	Cooper	[7218]
Ian	Cooper	[7158]
Louise	Cooper	[5759]
Kristiina	Cooper	[5960]
Nicholas	Cooper	[7221]
D	Coote	[7307]
Ryan	Copping	[6303]
E	Copping	[6300]
Judy	Corkill	[7000]
Jean	Corlett	[5866]
Peter	Corlett	[5756]
Jan	Cornelius	[6729]
Andrew	Cornthwaite	[6428]
Jim	Cosgrove	[6835]
Suzanne	Costello	[7067]
Ronald	Coultrup	[6440]
Claire	Coupe	[6987]
M	Cox	[7455]
Trevor	Cox	[6249]
Sophie	Cox	[6855]
Taylor	Coxall	[7223]
Carole	Crabb	[7028]
Carol	Creswell	[6200]
Kevin	Creswell	[6199]
Neal	Creswell	[6201]
Bramwell	Cripps	[7060]
Kim	Cripps	[7061]
Sarah	Cripps	[7214]
Peter	Crool	[5999]
David	Cross	[6306]
Philip	Crowe	[6078]
Anne	Crowther	[7035]
Tim	Crowther	[6509]
David	Cullingford	[5225]
David	Cullingford	[6470]
R	Cummings	[7426]
Barry	Cummins	[7470]
Jennifer	Cummins	[6682]

John	Cunningham	[7023]
C	Curran	[6397]
John	Curry	[5781]
Jon	Curtis	[7014]
Terase	Curtis	[7443]
Robert	Dagnell	[6325]
Diane	Dagnell	[6326]
Tim	Dalton	[6730]
Claire	Dangan	[7439]
Matthew	Dangell	[6323]
Robert	Dangell	[6313]
Colin	Daniels	[6726]
Graham	Daniels	[6369]
Alison	Daniels	[6370]
Joanne	Darrell	[6215]
Paul	Darrell	[6287]
Hazel	Davey	[7181]
Richard	Davey	[5941]
Alan	David	[6107]
Martin	Davie	[6858]
Craig	Davies	[6888]
Stephen	Davis	[6040]
Neil	Dawson	[7055]
Peter	Dawson	[7031]
Sarah	Dawson	[7032]
E	Day	[6546]
Robert	Day	[6122]
A	De	[6843]
E	De	[6089]
Gwenda	Deal	[6857]
Matthew	Dean	[7168]
F	Deether	[6251]
John	Deether	[6989]
Philip	Degen	[5949]
Karen	Denbow	[7075]
Douglas	Dennis	[6123]
David	Dent	[7045]
J	Denton	[6976]
Frances	Dewsett	[6119]
James	Dickinson	[5986]
Scott	Dickinson	[5984]
Astrid	Dickinson	[5947]
Linda	Dickinson	[5985]
William	Dickson	[6455]
Paul	Dines	[6229]
Angela	Dines	[6230]
Colin	Dingwall	[5924]
J	Dingwall	[6727]
Adele	Dixon	[6652]
Caroline	Dixon	[7006]
Chris	Dixon	[6506]
Edward	Dixon	[6525]
Graham	Dixon	[6796]
Jill	Dixon	[6583]
Laura	Dixon	[7029]
Lynette	Dixon	[6565]
Maria	Dixon	[7005]
Matthew	Dixon	[6612]
Faye	Dixon	[5946]
Paul	Dixon	[7007]

Stanley	Dixon	[7415]
Stephanie	Dodd	[6537]
Barbara	Doherty	[7057]
P	Dollery	[6818]
Peggy	Doman	[7512]
Mr	Donald	[6842]
Mrs	Donald	[7321]
Chris	Donnelly	[6190]
Rachel	Donnelly	[6192]
Susan	Donohoe	[7059]
Lee	Dorman	[6410]
Kay	Douglas	[7024]
Peter	Douglas	[5054]
James	Downing	[7501]
Sarahhelen	Dowse	[6568]
John	Drake	[6737]
Tom	Duckmanton	[6304]
Vivien	Dudley	[6036]
Patrick	Dudley	[7284]
Sheena	Duigenan	[6617]
Ian	Duncan	[5848]
Michael	Dunlea	[6179]
Alan	Dunnage	[6698]
L	Dunnage	[6688]
John	Dunne	[7476]
Judy	Dunne	[5051]
Liam	Dunne	[7474]
Claire	Dunstan	[7239]
Jo	Dunstan	[7243]
Kath	Dunstan	[6733]
Paul	Dunstan	[7244]
Ken	Dunstan	[6587]
Jordan	Durber	[6505]
Philip	Durber	[6619]
Jennie	Durber	[6618]
Christopher	Durman	[7119]
Jack	Durman	[7121]
Molly	Durman	[7120]
Lucy	Durman	[6340]
Nat	Durman	[7122]
Giuseppe	D'Urso	[7283]
P	Dyball	[7541]
Peter	Dyble	[6830]
E	Eastwood	[5972]
James	Eastwood	[7040]
L	Eastwood	[6604]
Noel	Eastwood	[5968]
Rupert	Eastwood	[7004]
Fiona	Eaton	[7376]
James	Eaton	[7378]
John	Eaton	[7377]
Tracy	Eaton	[6965]
Sarah	Edmonds	[6442]
B	Edwards	[6495]
D	Edwards	[6632]
Gruff	Edwards	[6037]
Margaret	Edwards	[7170]
Mary	Edwards	[7248]
Michael	Edwards	[6564]
Anthony	Edwards	[6770]

David	Edwards	[6758]
Stephen	Edwards	[6494]
Beryl	Edwards	[6772]
Edna	Edwards	[6311]
Roy	Edwards	[6986]
Kim	Elaine	[7436]
Ottoline	Elbishlawi	[7607]
Mrs	Elfick-Wood	[6594]
Katharine	Elliot	[6514]
Elizabeth	Elliot	[6854]
Alan	Elliott	[6117]
Susan	Elliott	[6163]
Sarah	Elliott	[6985]
Jon	Ellis	[7527]
Brian	Ellis	[6606]
Joan	Ellis	[6371]
W	Ellis	[7185]
Brian	Elms	[6637]
Guy	Elms	[6749]
Andrew	Elsdon	[6042]
Nina	Elsdon	[7516]
Gareth	Emanuel	[7290]
Linda	Emanuel	[5958]
Muriel	Emanuel	[5957]
Dominic	Emery	[6901]
Keren	Emery	[7335]
Dawn	Emery	[5740]
John	Ensell	[5755]
Richard	Epworth	[6963]
A	Etter	[6096]
Peter	Etter	[5226]
Tony	Evans	[5664]
Adrian	Evans	[7498]
Maureen	Evans	[7442]
Michael	Evans	[6356]
Susan	Evans	[7184]
Laura	Fabiani	[6171]
Laura	Fabiani	[6466]
Derek	Farley	[6853]
Suzanne	Farmer	[7421]
David	Farningham	[5042]
Ken	Faux	[7380]
Michael	Fearn	[7654]
Helen	Feeney	[6706]
Christine	Fells	[6217]
Angela	Felstead	[6721]
John	Felstead	[6528]
Kealy	Felstead	[6722]
Ian	Felstead	[6250]
June	Felstead	[6328]
Elaine	Ferguson	[5991]
J	Field-Bibb	[6387]
Victoria	Fifield	[6253]
Chris	Finch	[6699]
D	Findlay	[7101]
Peter	Findlay	[6508]
P	Finlay	[6763]
Lorraine	Firth	[6750]
Julia	Fisher	[6813]
Pauline	Fitch	[6959]

Harlow Civic Society

RAMCO (Harlow) Ltd

Rebecca		Fitch	[6553]
Ciaran		Fitzgerald	[7105]
Niamh		Fitzgerald	[7104]
Sean		Fitzgerald	[7106]
Suzanne		Fitzgerald	[7107]
R		Flagg	[6551]
Katherine		Fletcher	[4850]
Y		Flowers	[7360]
Amanda		Fordham	[5922]
Craig		Fordham	[5919]
Doris	Evelyn	Fordham	[6182]
Michael		Fordham	[5996]
Ian		Foreman	[6788]
Mrs		Foreman	[6782]
S		Forsyth	[7109]
Diane		Fossey	[7384]
David		Foster	[6882]
John		Foster	[7296]
Terry		Foster	[5955]
Samantha		Foster	[6889]
Nicola		Foster	[6459]
Skye		Foster	[6881]
Harrison		Foster-Butters	[6891]
Bethany		Foster-Butters	[6890]
Matthew		Fowell	[6764]
Robert		Fowell	[6767]
Hannah		Fowell	[6765]
Sally		Fowell	[6766]
Chris		Fox	[6990]
Matthew		Fox	[6914]
Jonathan	& Nina	Fox	[6081]
Julie		Fox	[6352]
Katherine		Fox	[6353]
Rob		Francis	[5812]
Rob		Francis	[7668]
Diane		Franzman	[7433]
Michael		Franzman	[7464]
Rose		Freeman	[216]
Cathy		Freeman	[7252]
Carl		French	[6403]
S		Freshwater	[6808]
Betty		Fricker	[7581]
Michelle		Frost	[6295]
Mauro		Fugazza	[5158]
Diana		Fullbrook	[6900]
Elaine		Furness	[6574]
Andy		Furze	[5688]
Bob		Gabriel	[6919]
Roger		Gaitley	[6153]
Andrew		Gale	[7054]
David		Gale	[5859]
David		Gale	[6533]
J		Gallantree	[6065]
Ian		Gallantree	[6061]
B		Gallantree	[6062]
P		Galoppi	[6221]
Gina		Galoppi	[6284]
Adam		Garwood	[215]
Robert		Garwood	[7276]
Susan		Garwood	[7277]

English Heritage

The Theatres Trust

Historic Environment Branch

Pamela	Gates	[7320]
Paul	Gates	[7440]
Alan	Gatland	[5880]
Janet	Gatland	[5879]
Angus	Gauld	[7564]
Denise	Gauld	[7565]
Finlay	Gauld	[7563]
Matt	Geddes	[6411]
Richard	Geddes	[6851]
Jackie	Geddes	[6876]
Tim	Geddes	[6697]
Rachel	Geller	[7247]
Simon	Geller	[6912]
Victoria	George	[7235]
D	Ghadami	[6424]
Jeremy	Gibb	[6090]
Phillip	Gibb	[5725]
David	Gibbs	[7572]
Linda	Gibbs	[7573]
Emma	Gibson	[7471]
Helen	Giles	[7325]
Ian	Gill	[7494]
Ann	Gillanders	[6402]
B	Gillespie	[5932]
Roy	Gillman	[7293]
Jacqueline	Gillman	[7589]
Kerry	Girolami	[7255]
Mark	Girolami	[7256]
Phil	Gladman	[7576]
Laura	Gleed	[7043]
Kevin	Gleeson	[7160]
D	Goggin	[7315]
Duncan	Goldsby	[5916]
Ian	Goldsmith	[6920]
Ruth	Gonzalez	[6327]
Chris	Gooch	[7295]
Judy	Gooch	[7294]
Doreen	Goodall	[5805]
Christopher	Goodbody	[6870]
Denise	Goodchild	[6609]
Trevor	Goodey	[7217]
Paul	Goodman	[6132]
Juliette	Goodwin	[6558]
Sean	Goodwin	[7282]
T	Goody	[6826]
Robin	Goodyear	[6829]
David	Gould	[5901]
David	Graham	[5886]
Ann-Marie	Grant	[4896]
Mark	Grant	[6405]
Robert	Grant	[6120]
Karen	Graves	[6728]
Richard	Greaves	[5555]
Angela	Green	[6734]
Ava	Greenwell	[6541]
John	Greenwood	[6650]
M	Greenwood	[6657]
Jennifer	Greenwood	[6674]
Julia	Gregory	[4726]
John	Gregory	[6164]

West Essex Primary Care Trust

Stansted Airport Limited

T	Gregory	[6141]
L	Gregory	[6187]
Philip	Greswell	[7510]
Kevin	Griffin	[6744]
Ian	Griffiths	[7579]
Paul	Griffiths	[6945]
Doreen	Grocott	[6645]
Michael	Grocott	[6656]
Rhoda	Grocott	[6335]
Tiziana	Groom	[5700]
Robert	Groves	[5840]
Kevin	Growden	[6483]
Ramesh	Gulrajani	[7002]
Chris	Gurry	[6519]
Denis	Gurry	[6521]
Gary	Gurry	[6513]
Norma	Gurry	[6517]
Peter	Haagensen	[5959]
Janet	Haley	[6479]
Janet	Hall	[6202]
John	Hall	[6203]
Philippa	Hall	[6257]
Sally	Hall	[6936]
Karen	Hambro	[6301]
Thomas	Hamilton	[6593]
Roget	Hamlett	[6460]
Shaun	Hammond	[6883]
Alan	Hampton	[6367]
Patricia	Hampton	[7608]
Mark	Hancock	[6008]
H	Hancock	[7634]
K	Hancock	[7172]
Patricia	Hannaford	[7231]
Richard	Hannah	[5938]
Ian	Happe	[6671]
D	Harman	[7069]
V	Harris	[7082]
G	Harris	[6532]
Steve	Harris	[6043]
G	Harris	[6531]
Susan	Harris	[6575]
Diana	Harrison	[5980]
Sally	Hart	[6649]
Elizabeth	Harvey	[6832]
Linda	Harvey	[7317]
Kathleen	Hastings	[6225]
Allan	Hatch	[6526]
David	Hatch	[6798]
Patricia	Haupt	[6398]
Roger	Havard	[7603]
Donna	Hawkins	[7125]
Jeff	Hawkins	[6560]
Steve	Hawkins	[6935]
Treena	Hawkins	[6561]
S	Hawryskiw	[7228]
Ron	Hawthorne	[6112]
Helen	Hawthorne	[6111]
Vivienne	Hayes	[7180]
Carol	Hayward-Peel	[6792]
Steven	Hearn	[6630]

Harlow Citizens Advice Bureau

W	Hebblewhite		[7081]
William	Heelan		[7205]
Judy	Heilpern		[7117]
Dawn	Helder		[6416]
Linda	Helm-Manley		[7333]
Dean	Hemmings		[6333]
Jason	Hemmings		[6713]
Junko	Hemmings		[6330]
Vivienne	Hemmings		[6714]
Tony	Hemmings		[6646]
William	Henderson	HOOP	[4968]
Janet	Henderson		[7118]
E	Henderson		[6605]
James	Henderson-Gibb		[6091]
Georgiana	Henderson-Gibb		[6092]
Margaret	Henderson-Tew		[6093]
Hazel	Henniker-Horn		[7216]
Caroline	Henry		[6262]
Alan	Henson		[5063]
K	Henson		[7201]
Hanna	Hessling		[6135]
Gordon	Hewlett		[6012]
Kate	Hicks		[6498]
Kevin	Higgs		[7628]
Kevin	Higgs		[5760]
Kim	Higgs		[5802]
D	Hilditch		[6453]
Peter	Hill		[6841]
Ian	Hill		[7399]
J	Hiller		[7450]
Linda	Hilton		[6150]
A	Hinkin		[7211]
Richard	Hinton		[5994]
Joy	Hoare		[6783]
Paul	Hodgkinson		[6429]
Louise	Hodgkinson		[6430]
Angela	Hodgson	Harlow Baptist Church	[459]
Alan	Hodgson		[5900]
Keith	Hodgson		[5865]
Georgina	Hofer		[6903]
Pat	Holder		[7485]
Richard	Holder		[7484]
Simon	Holder		[6576]
Jean	Hollylee		[5122]
Roger	Hollylee		[6615]
Tom	Hollylee		[7499]
Steven	Hollyman		[6817]
Ann	Holt		[7517]
Ian	Holt		[7521]
Michael	Holway		[6392]
Tim	Holway		[6391]
Lois	Holway		[5954]
Madeleine	Holway		[6076]
Sue	Holway		[6390]
Chris	Homewood		[6802]
John	Hopton		[7327]
P	Hopton		[5975]
Andrea	Horner		[7406]
Joe	Horsley		[7633]

Sally		Hoskins		[6337]
P		Hough		[7667]
Peter		Hough		[5813]
Anne		How		[6659]
D		Howard		[6239]
Gary		Howard		[6725]
M		Howard		[6582]
Sandra		Howard		[6118]
Michael		Howarth		[5049]
Antoinette		Howarth		[6047]
Kirsty		Howden		[6103]
Alastair		Howe	Alastair Howe Architects	[3351]
Janet		Howes	Redeemer Lutheran Church	[464]
Ian		Hudson	Copyzone Archiving Ltd	[5684]
David		Hughes		[6980]
Marcus		Hughes		[6048]
Margaret		Hughes		[5105]
Sylvia		Hughes		[6600]
Margaret		Hulcoop		[65]
David		Hunt		[6972]
Susan	& David	Hunt		[6824]
Susan		Hunt		[6958]
Daniel		Hurst		[7236]
Claire		Hutchinson	PWLL Consortium	[7644]
Jacqueline		Hutchinson		[7291]
Jennifer		Hutchinson		[6731]
M		Hutchinson		[6286]
Margaret		Hutt		[6859]
Janice		Hyde		[7424]
Chris		Hyland		[7139]
G		Hyland		[6757]
Jutta		Ignatiou		[6016]
Eleftherios		Ignatiou		[6015]
Veronica		Iliffe		[7366]
C		Ings		[7466]
Zeana		Instance		[7400]
Carl		Inwood		[7161]
Barbara		Ireland		[6158]
David		Irons		[6577]
Graham		Irwin		[7275]
R		Irwin		[7445]
B		Jaafar		[7091]
E		Jaafar		[7090]
J		Jaafar		[7089]
M		Jaafar		[7088]
Charles		Jackson		[6100]
S		Jacobs		[7209]
Adrian		James		[7354]
David		James		[6924]
Trevor		James		[6562]
Alexandra		Jane		[6877]
Eleanor		Jane		[7487]
Flora		Jane		[7372]
Peter		Jarman		[7337]
Pru		Jarman		[7336]
R	A	Jarvis		[6747]
S	A	Jarvis		[6748]
Mr		Jay		[7595]
Gary		Jeffery		[7423]
Barbara		Jeffrey		[6520]

R		Jenkins	[7515]
Clare		Jenkins	[5988]
Sam		Jenkins	[6064]
Teresa		Jenkins	[6790]
Ashley		Jennings	[6666]
John		Jewell	[6168]
Paul		Joghee	[6476]
Laurie		John	[5896]
Andrew		John	[7533]
Christopher		Johnson	[6324]
Gloria		Johnson	[7432]
Andrew		Johnston	[7549]
M		Jolley	[7371]
David		Jolley	[6415]
B	T	Jones	[6418]
Catherine		Jones	[7026]
Cathleen		Jones	[6701]
Gillian		Jones	[7072]
Glyn		Jones	[7019]
Joan		Jones	[5892]
Moira		Jones	[5031]
Paul		Jones	[6354]
Trevor		Jones	[6365]
Emily		Jones	[7611]
Emmer		Jones	[6382]
Jane		Jones	[6383]
Melanie		Jones	[6381]
Simon		Jones	[6993]
B		Jordan	[6542]
Keith		Jordan	[7111]
Emily		Jordan-Wilson	[5971]
Sarah		Jowett	[6053]
Lee		Joyce	[6138]
Emma		Juniper	[7374]
Michael		Jury	[6178]
Marcus		Karn	[5965]
Madeleine		Karn	[5930]
Caroline		Karsten	[7567]
Edward		Karsten	[7561]
Peter		Karsten	[7559]
Robert		Karsten	[7560]
Jean		Kay	[6261]
Ray		Keane	[6805]
James		Keir	[5830]
Roger		Keith	[6573]
M		Kelly	[5935]
John		Kelly	[7367]
Peter		Kelsey	[7292]
Peter		Kelsey	[6718]
Barbara		Kemmett	[6051]
Suzanne		Kennard	[7233]
Shirley		Kenworthy	[6595]
Stan		Kenworthy	[6496]
A		Kilbee	[7546]
K		Kilbee	[7548]
Aileen		Kilbee	[7547]
Stephanie		Kimble	[5831]
Peter		King	[6025]
David		King	[6778]
David		King	[6789]

Essex Electrical Contracts

Joanna		King	[6320]
Judy		King	[6307]
Margot		King	[6248]
Samantha		King	[6050]
Paul		Kirkby	[5772]
P		Kitchen	[7349]
David		Kitching	[6224]
Chris		Kitts	[6668]
Vassilios		Kladaras	[6809]
Stephanie		Klidaras	[6524]
Daniel		Knight	[6130]
Esther		Knight	[7174]
Frankie		Knight	[6129]
Gillian		Knight	[6029]
Gracie		Knight	[7041]
Lauren		Knight	[6642]
Matthew		Knight	[6206]
Ritchie		Knight	[6641]
Rosie		Knight	[6205]
Angela		Kurton	[5811]
Marek		Kwiecinski	[5937]
Peter		Lainson	[92]
D		Lake	[7316]
Jean		Lambert	[6033]
John		Lambie	[6911]
Sue		Landon	[6760]
David		Langhelt	[6443]
M		Langman	[6849]
Roy		Langman	[6270]
O		Langman	[6884]
R		Langman	[6885]
S		Langman	[6886]
Steven		Langman	[6186]
Tony	& Jackie	Langsdale	[6621]
Christine		Lapidge	[5923]
Roger		Lapidge	[6115]
Natalie		Larkin	[7551]
Jacqui		Law	[6946]
Joan		Law	[7049]
Michael		Law	[6643]
Philip		Law	[6241]
Nick		Law	[6836]
Maurice		Lawrance	[7528]
M		Lawrancee	[7141]
David		Lawson	[6177]
Jennifer		Lazell	[7605]
Christine		Le	[6952]
Alan		Le	[6317]
Nick		Lee	[7639]
Barry		Lee	[7258]
Heather		Lee	[6724]
P		Lee	[6683]
J		Lee	[6493]
Joanne		Lee	[6242]
Patricia		Lee	[7402]
Judith		Leigh	[7147]
Roger		Leigh	[7165]
Patrick		Leng	[6863]
Barbara		Leslie	[6409]
Martyn		Lewington	[7280]

Harlow Area Access Group

Dooba Investments VI Ltd

Thomas		Lewington		[7602]
Katherine		Lewington		[7601]
Sylvia		Lewis		[7008]
Corinne		Lewis		[6413]
Paul		Lewis		[7012]
M		Lilley		[7050]
A	E	Linnit		[7636]
Dawn		Lloyd	Environment Agency	[7604]
John		Lloyd		[5885]
Pauline		Lloyd		[5858]
A		Locke		[7301]
Michael		Lodge		[6226]
E		Lodge		[6302]
Janet		Lodge		[6296]
Georgina		Loftus		[7154]
Mike		Loftus		[7036]
Maxine		Loftus		[7355]
Claire		Lomax		[5872]
Harry		Long		[7153]
Rhona		Long		[7152]
Steve		Long		[7149]
Yvette		Lord		[6923]
Ellie		Louise		[7342]
Adam		Lowe		[6104]
Treena		Lowe		[6228]
Lesley		Lowers		[6308]
R		Lowers		[6210]
Frances		Luck		[7222]
Peter		Luck		[6310]
Karen		Lydia		[6850]
R		Mabey		[6329]
Barbara		Mackay		[6277]
Terry		Mackay		[6279]
Cameron		Mackenzie		[6806]
Stephanie		Madsen		[6774]
Jill		Maher		[7021]
Paul		Maher		[5058]
Paul		Maison	British Waterways	[146]
Janice		Makin		[7206]
John		Makin		[6610]
Richard		Makin		[5962]
Lisa		Makin		[5963]
Rebecca		Makin		[7566]
The		Manager	Apollo Specialist Engineering	[3383]
The		Manager	Edmonson & Fountain	[6678]
The		Manager	Residents Orchard House	[6934]
Paul		Manley		[7332]
P		Mann		[7056]
C	S	Mansbridge		[6439]
Neil		Mantell	Redrow Homes	[7655]
Andrew		Mark		[6752]
Revd		Mark		[7422]
Gordon		Marks		[6740]
John		Marks		[6020]
Toby		Marks		[6629]
W		Marks		[6831]
Wenna		Marks		[6140]
Nicholas		Marks		[7460]
Toby		Marks		[7459]
Caroline		Marsh		[6893]

Muriel		Marshall		[7386]
Caroline		Marston		[7382]
Colin		Marston		[7383]
Jim		Martin		[7137]
Richard		Martin		[6417]
Sheila		Martin		[7156]
Luigi		Martini		[6218]
N		Mascall		[7009]
Wendy		Maskell		[7486]
David		Mason		[7063]
Leann		Mason		[6559]
Danielle		Mason		[6247]
Diane		Matt		[7627]
Diane		Matt		[5806]
Elias		Mavrommati		[6567]
Edward	& Ethel	Mawdsley		[6009]
Toni		Max		[7281]
Gillian		May		[6742]
Hilda		May		[6021]
Regina		May		[6679]
Joyce		May		[6148]
Janet		Mayes		[7417]
Henry		Mayes		[7200]
Jemima		Mayes		[7197]
Lydia		Mayes		[7198]
Sarah		Mayes		[7199]
Brian		Mayhew	Dale Insurance Services	[5895]
Patricia		Mayhew		[5810]
Robin		McCartney	Churchgate Street Residents Association	[5539]
Ken		Mcdonald		[7204]
S		Mcdonald		[6693]
G		Mcdonald		[6703]
M		Mcdonald		[6695]
M		Mcdonald		[6702]
I		Mcfayden		[6779]
Matthew		Mcgill		[7314]
Jo		Mcgill		[7183]
Graham		Mcisaac		[7375]
Paula		McManus		[6293]
Hugh		Mcmanus		[7392]
Nicola		Mcmanus		[6793]
Neil		McManus		[6290]
John		Mcmillan		[6238]
Scott		Mcnamee		[7469]
Leighanne		Mcnaught		[6880]
Hazel		Mead		[6899]
John		Mead		[6035]
Claudia		Mead		[7405]
Margaret		Mead		[6155]
Jean		Meakin		[6616]
Andy		Medhurst		[7387]
Caroline		Meehan		[6917]
D		Meehan		[6913]
C		Meehan		[7497]
Adam		Meldrum		[6636]
Bernard		Mella		[5913]
Jacqueline		Mella		[5914]
A	D	Mella		[6454]
Gillian		Melling		[6087]
Fiona		Menzies		[5832]

Jeannette	Mercer	[6134]
Sean	Mercer	[6133]
Jacqueline	Mermoud	[5926]
Steven	Meshor	[6342]
Jan	Metcalf	[6654]
Francesca	Micheli	[6359]
M	Michelson	[6691]
H	Michelson	[6700]
	Middlebrook	[7272]
Amanda	Middleton	[6669]
Andrea	Middleton	[6712]
Laura	Middleton	[6709]
Megan	Middleton	[6710]
C	Middleton	[7046]
D	Middleton	[7190]
Harry	Middleton	[6711]
C	Middleton	[7189]
Annmaria	Miechielsens	[7598]
Christopher	Millard	[7495]
Kim	Millard	[7518]
Ray	Millard	[7249]
Nigel	Miller	[6041]
Simon	Miller	[6557]
Faith	Mills	[6146]
Malcolm	Mills	[6149]
Craig	Milosh	[6348]
Nebojsa	Milovanovic	[6267]
Joseph	Mishan	[6867]
Nina	Mistry	[6219]
Francis	Mitchell	[6591]
Madeleine	Mitchell	[5966]
Olivia	Mitchell	[5931]
Helen	Mitchell	[5927]
S	Mitchell	[6681]
Jennie	Moncur	[7142]
Lorna	Montgomerie	[6276]
Nick	Moore	[7318]
Steph	Moore	[7016]
Stevie	Morden	[5221]
Danny	Morgan	[7044]
Jacqueline	Morgan	[6339]
Keith	Morgan	[7328]
Dianne	Morgan	[6667]
Esther	Morgan	[7306]
Ronald	Morgan	[7537]
Suzanne	Morgan	[7553]
Alan	Morley	[7102]
Sheila	Morley	[6672]
Blaise	Morris	[6108]
Mark	Morris	[7278]
Melanie	Morris	[6956]
Felix	Morris	[6477]
Gwyn	Morris	[5185]
Jemima	Morris	[6478]
Kathleen	Morris	[5080]
Susanna	Morris	[6237]
Philip	Morris	[6955]
Lucy	Morris-Eyton	[7409]
Brenda	Morrison	[6941]
John	Morrison	[6940]

Keira		Morrison	[6019]
John		Morrison	[6704]
Mr		Morrison	[7253]
Robert		Morrison	[6393]
B		Morrison	[6784]
Mrs		Morrison	[7254]
Colleen		Morrison	[5674]
David		Morton	[6139]
Jamie		Morton	[7323]
Jeremy		Morton	[6736]
J		Morton	[6833]
J		Moseley	[6608]
Ian		Moss	[7188]
Marion		Moss	[6222]
Rodney		Munday	[6511]
Nicola		Munday	[7505]
Richard		Munday	[7155]
Katherine		Munro	[7698]
Andrew		Munro	[6777]
Brian		Munro	[6540]
Deborah		Munro	[6846]
Philip		Murphy	[7657]
Becca		Murphy	[6868]
Alison		Murray	[7599]
John		Mustafa	[5016]
John		Mustafa	[5678]
B		Mutter	[7329]
Juliet		Nabavi	[7017]
Gordana		Najdanovic	[6265]
Jackie		Nash	[6142]
Jane		Nathan	[5989]
Alan		Naughton	[7011]
Carmel		Naughton	[7010]
Alan		Naughton	[6795]
Sally		Naylor	[5259]
David		Needham	[7396]
Suzanne		Neville	[7070]
Graham		Newell	[6974]
Arthur	Stanley	Newens	[5917]
Sandra		Newens	[5918]
Thomas		Newens	[5899]
M		Newitt	[6601]
Amanda		Newman	[7434]
Lorraine		Newman	[6585]
Ben		Newman	[6245]
Rachel		Newman	[5934]
Tina		Newman	[6246]
Pamela		Newman	[6176]
Victoria		Newman	[7584]
Mike		Newton	[7646]
Hedley		Newton	[7506]
Linda		Newton	[6166]
Marco		Newton	[7297]
Kay		Newton	[5942]
Paul		Newton	[5871]
Virginia		Newton	[7461]
J		Nicholls	[6243]
Charles		Nicholson	[6406]
M		Nicholson	[7300]
Diana		Nicholson	[6343]

MRB Services Ltd

Hertfordshire Biological Records Centre

Harlow North Joint Venture (HNJV)

Mulberry Green Residents Association

Roydon Road Residents Association

Hallam Land Management & Commercial Estates Group

Esther		Nicklin		[6396]
Edward		Nightingale		[7568]
Kaye		Nightingale		[7570]
Eric		Nimalan		[6264]
Cedric		Nimmo		[6957]
Edward		Noakes		[6988]
Ruth		Noakes		[6814]
Barbara		Noble		[5680]
Bryan		Norman		[6485]
Sandra		Norris		[7114]
Sara		Norris		[7115]
Robert		Norris		[5852]
S		Norris		[7113]
G		Norris		[7112]
Sandra		Norris		[5851]
Carly		Norton		[6145]
Lynn		Norton		[6180]
Andrew		Noton		[5860]
Iain		Nuttall		[6193]
Mrs & Mrs		Nuttall		[6266]
Caroline	& Neile	Oakley		[6173]
Zhanine		Oates	Essex County Council	[5406]
Suzanne		O'Brien		[6773]
Anthony		O'Connor	Moat Homes	[5737]
Anthony		O'Connor		[6660]
Glenda		O'Dowd		[7479]
Richard		O'Dowd		[7472]
Abigail		O'Dowd		[7390]
Emily		O'Dowd		[7404]
Shaun		O'Dowd		[5077]
Jake		O'Gorman		[6432]
Natalie		O'Leary		[6189]
Amanda		Olsen		[6676]
Jill		O'Neill		[6285]
Kevin		O'Neill		[6023]
James		Ord		[6686]
Hugh		O'Reilly		[6504]
Luke		O'Reilly		[6622]
Margaret		O'Reilly		[6503]
Peter		O'Reilly		[6136]
Michael		Orsbourn		[5821]
Mark		Orson	Eastwick and Gilston Parish Council	[7610]
Mark		Orson		[5979]
Christina		Orson		[5982]
Sarah		Orson		[7477]
Jackie		Osborne		[6598]
Clare		O'Shea		[6692]
Frank		O'Shea		[6106]
Matthew		O'Shea		[6283]
Karen		Osterley		[7373]
Robin		Osterley		[7468]
Wil		Overton		[7408]
B		Oxenbridge		[7094]
D		Oxenbridge		[7096]
Emma		Oxenbridge		[7097]
F		Oxenbridge		[7093]
J		Oxenbridge		[7092]
Max		Oxenbridge		[7274]
Oliver		Oxenbridge		[7098]
S		Oxenbridge		[7095]

Seb		Oxenbridge	[7273]
Melvyn		Page	[6589]
Thomas		Page	[6840]
Trevor		Paice	[6095]
Agnes		Pain	[6275]
Martin		Paine	[5682]
Howard		Palmer	[7478]
Ruth		Palmer	[7631]
Arthur		Pape	[7068]
Brenda		Pape	[7066]
Sa		Papworth	[7138]
Douglas		Parfett	[6109]
Jane		Parfitt	[7129]
Jordan		Parfitt	[7146]
Poppy		Parfitt	[7128]
Stuart		Parfitt	[7130]
Anthony		Parish	[6860]
Martin		Parker	[6754]
Matthew		Parker	[6755]
Michael	& Jeffery	Parker	[7672]
Stephen		Parker	[5827]
Rebecca		Parker	[5826]
Holly		Parker	[6756]
David		Parkin	[7003]
J		Parkinson	[7410]
John		Parrott	[6827]
Malcolm		Parrott	[6603]
Kelly		Parrott	[6614]
Jacqueline		Parsons	[7534]
Keith		Parsons	[7558]
Leena		Patel	[7126]
C		Patmore	[6451]
Douglas		Pattie	[7463]
Douglas		Pattie	[6759]
G		Pawle	[7519]
Alison		Peacock	[7250]
Beverley		Peacock	[6527]
Roger		Peacock	[6545]
Louise		Peake	[6554]
Derke		Peasey	[6086]
J		Peasey	[7600]
Peter		Pegram	[7298]
Robert		Pegram	[6874]
Teresa		Pegram	[7299]
Jacqueline		Pegram	[6875]
Ann		Pegrum	[6034]
Mr		Pegrum	[7430]
Mrs		Pegrum	[7429]
Donald		Pendrill	[6786]
A		Pendrill	[6785]
Brian		Penn	[7365]
Sofie		Penn-Slater	[6197]
Gill		Perkin	[6634]
Steven		Perrin	[5751]
Anne		Perry	[5911]
Roger		Perry	[5909]
Chrissie		Peters	[7522]
Ann		Petherick	[6720]
Sarah		Phillipps	[7475]
Alice		Phillips	[6208]

East Herts. District Council

Graham	Phillips	[5888]
Graham	Phillips	[6464]
Maurice	Phillips	[7171]
Carolyn	Phillips	[5807]
C	Phipps	[6662]
C	Phipps	[7159]
Patricia	Phipps	[7257]
Trevor	Phipps	[6918]
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Hunsdon Parish Council

Persimmon, Taylor Wimpey & Martin Grant Homes

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J		Schlenker	[7407]
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Crest Strategic Projects

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Lewis		[7597]
Lina		[7596]
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Deborah		[6094]

How would YOU plan Harlow's future?

Have your say!



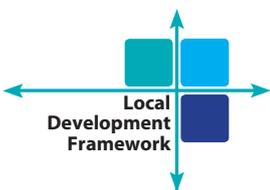
Core Strategy Issues and Options Consultation

Summary Leaflet

Consultation ends 5pm
on Friday 28 January 2011

www.harlow.gov.uk/issuesandoptions

HARLOW - see something different



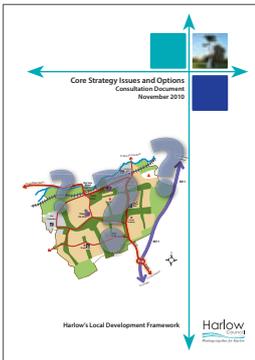
What is the Core Strategy?

Harlow Council is preparing a new plan for Harlow called the Local Development Framework (LDF). The Core Strategy will be the main planning document in Harlow's emerging LDF which will guide development in the district to 2026 and beyond.

The Core Strategy will set out the location of:

- New housing
- Employment areas
- Shops
- Schools
- Community and leisure facilities
- Green spaces
- Transport improvements

The Council is now consulting on the first stage of Harlow's Core Strategy called "Issues and Options". This sets out the key issues that need addressing in Harlow and proposes possible options for planning the town's future.



This summary leaflet provides a brief outline of the 'Issues and Options' consultation document. The full version of the consultation document and questionnaire can be viewed online at www.harlow.gov.uk/issuesandoptions

Give your views on how Harlow should develop!

The Government has stated its intention to formally abolish the Regional Plan which set out the development strategy and requirements for Harlow. This is called the East of England Plan. This will mean decision-making powers in planning and housing will be returned to local authorities and Harlow will be able to determine how Harlow should change in the future.

This consultation is your opportunity to have your say on this first stage of preparing and developing the future plan for Harlow.

The Vision for Harlow

The Core Strategy will be based on the vision and priorities in the Community Strategy, the Harlow 2020 Vision. The 2020 Vision sets the overall vision for the district which is as follows:

"A clean, safe, sustainable and healthy town with good educational prospects for its citizens, a variety of homes and jobs to meet local needs, and a range of sporting, leisure and cultural opportunities contributing to a higher quality of life."

The Core Strategy provides the "spatial planning framework" (the location for new development) to put this vision into practice. This will be achieved by developing key themes and strategic objectives that will help to address the issues that have been identified so far affecting Harlow.

Five core themes have been set out to help develop the new plan:

• **Placeshaping** - Enhancing the quality of the built and natural environment

• **Housing** - Delivering housing at the right scale, of the right type and in the right location to meet the needs of the whole community

• **Prosperity** - Securing economic growth and regeneration in order to improve employment and educational opportunities in the town and reflect its strategic role

• **Infrastructure** - Ensuring growth and regeneration is supported by appropriate levels of infrastructure provision

• **Lifestyles** - Meeting the leisure, recreational and cultural requirements of the community in a sustainable manner

26 strategic objectives have also been identified which will form the basis of the policies and proposals to deliver the vision for Harlow.

Your comments on the vision, themes and strategic objectives are needed as they will be the basis of Harlow's Core Strategy.

See Part 4 of the full consultation document for more details.

What are the Issues?

In each theme there are a number of common issues affecting Harlow. These issues have been identified through informal consultations and evidence that has been gathered over the past couple of years. The issues you consider are important will be taken forward into the Core Strategy.

Placeshaping

- The quality of green spaces should be maintained and protected
- The New Town principles are important
- High quality sustainable architecture and design should be promoted
- Brownfield land should be developed before Greenfield
- The Green Wedges should be strengthened in order to improve aesthetic appeal, sense of place and links to the countryside

Housing

- A range of house types and tenures is required to meet the needs of all the community
- Some housing densities are too high
- Extra care housing is needed
- About 35% of new dwellings should be affordable

Prosperity

- The town centre should be more attractive and vibrant
- Education, training and skills base needs to be improved in the town
- The choice of shops in the town and neighbourhood centres needs to be improved
- Harlow has below average provision of convenience and service units and high quality retailers compared with competing centres

Infrastructure

- Road and other infrastructure must be provided to accommodate growth
- Traffic congestion in the town needs to be addressed
- Cycleway and footpath connections in the town need to be improved
- Children's centres and youth facilities will be needed to support the new communities

Lifestyles

- Recreational facilities should be protected and enhanced
- Crime, safety and anti-social behaviour in the town should be addressed
- Policies should raise the levels of aspiration within the town
- Quality green spaces for public health and leisure use should be protected and maintained
- Theatre provision for Harlow and the wider area should be improved
- The River Stort and its floodplain should be promoted as areas for recreational use



Do you think all the issues have been identified? Or are there any other issues that you think should be addressed by the Core Strategy?

You can get more details about the issues in Part 2 of the full consultation document.

What are the Options?

Guiding future development

To meet Harlow's current and future needs, the town needs to regenerate. To do this requires new housing and economic growth, alongside associated infrastructure improvements.

But how much new development is required, and what principles should guide growth?

The level of growth

The Core Strategy will need to ensure that the issues and future development needs of the community are met.

The evidence that supported the East of England Plan shows that the provision of 16,000 new homes and approximately 8,000 jobs in the Harlow area would help to address Harlow's issues by stimulating the regeneration and renewal of the town.

The Council believes that this level of growth will not only meet the needs of the existing community but also help address the other issues affecting Harlow's future prosperity.

Do you agree that the community needs should be met and the regeneration of Harlow secured through this scale of growth?

See Part 3 of the consultation document for more information.



Regeneration at Clifton Hatch



What principles should guide growth?

The Council believes that new development should support regeneration and be sustainable. This will ensure that the new plan delivers the Community Strategy vision and strategic objectives for Harlow.

In order to achieve this, the opportunities for development within the urban area boundary will be examined before land in other locations such as the Green Belt. This will ensure that there are close links between where people live, work and spend their leisure time and the services they require.

Options that could achieve new development are set out below:

- Increasing the density of development at appropriate locations within the urban area of Harlow
- Examining the opportunities for development on undeveloped land
- Examining the development potential on unused or underused open spaces
- Appraising the function and effectiveness of Harlow's Green Wedges to ensure they meet current expectations

If the additional development needed to meet the community's future needs cannot be achieved through these options, the role and location of urban extensions will be considered.

Additional issues that also need considering are:

- The ability of existing employment sites to meet current and future employment needs
- The role and function of the town's shopping centres (from the Town Centre down to Hatches)

What do you think about the suggested principles and options for directing regeneration and growth?

These issues are covered in detail in Part 5 of the full consultation document.

Consultant's suggested growth options

A level of growth of 16,000 new homes was proposed in the East of England Plan to secure the regeneration of the town. An independent assessment was undertaken to review possible growth options proposing 5,000 in the built up area of the town and 11,000 in other locations.

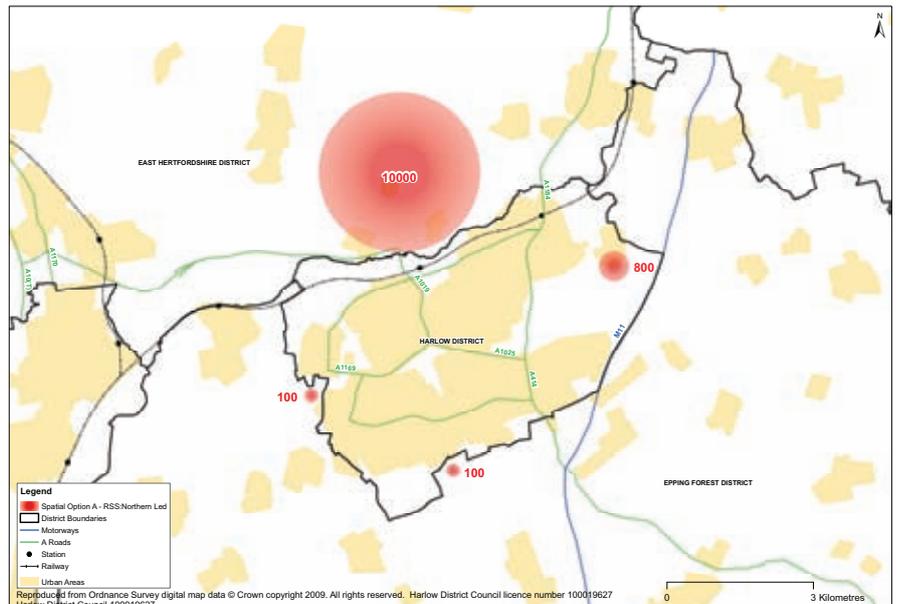
Although the East of England Plan is likely to be withdrawn, the Council believes the assessment remains relevant for examining a range of possible options for growth that may be required around Harlow. **View the report: www.harlow.gov.uk/ldf (following the link to 'LDF Evidence Base')**

Option A - Regional Spatial Strategy: Northern-led

This approach is based on the policy in the East of England Plan. This placed the bulk of growth to the north of Harlow, with some growth to the east and smaller growth to the south and west.

The consultant suggested that this is not a reasonable option as there is an unacceptable risk that the development would not be delivered during the plan period.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.2 and 6.7.3 in the full consultation document.

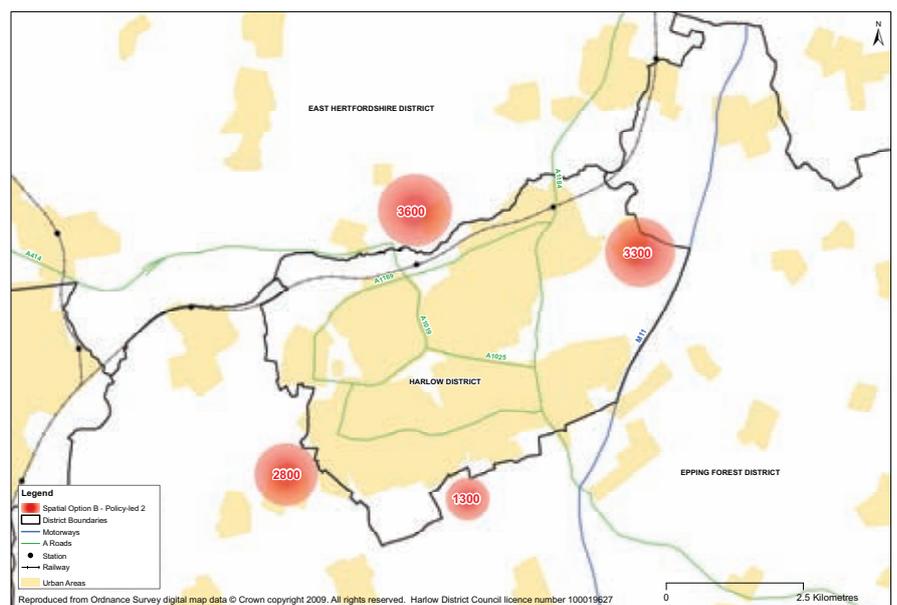


Option B - Policy led 2

This approach reflects the broad directional and distributional elements of the growth requirements set out in the East of England Plan, but does not focus the bulk of the new housing provision to the north of Harlow.

The consultant felt this would be a reasonable option if lower levels of housing growth were proposed for the area west of Harlow with greater growth explored to the east and south.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.4 - 6.7.6 in the full consultation document.

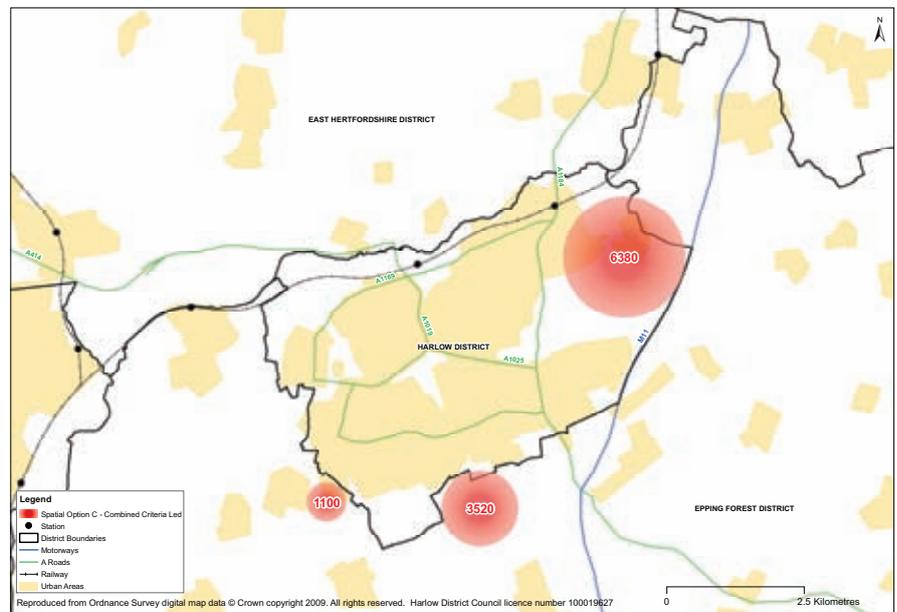


Option C – Combined criteria led

This approach is based on an assessment of Green Belt, landscape sensitivity, flood zones, regeneration objectives and transport accessibility, but ignores the specific strategic directions for growth set out in the East of England Plan.

The consultant concluded that situating significant numbers of new dwellings close to Junction 7 of the M11 would encourage private car use within an area unable to cope with increased traffic without a southern bypass. Growth to the south could affect the ridgeline that provides a southern edge and setting for the town.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.8 - 6.7.11 in the full consultation document.

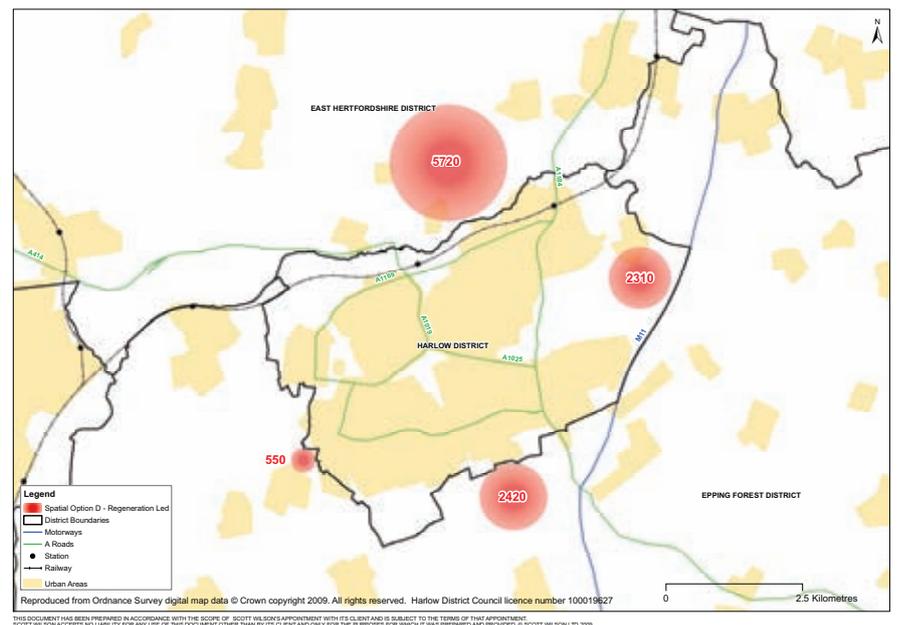


Option D – Regeneration led

An alternative approach examined the identification of areas of search and distribution of new housing based upon securing the greatest potential regeneration benefits for locations within Harlow.

The consultant suggested that this option is not considered a reasonable option due to transport and sewerage constraints associated with high levels of development to the north.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.12 - 6.7.16 in the full consultation document.



The Delivery Strategy

Finally, the Core Strategy will need to identify a delivery and implementation strategy and the key infrastructure required to support future development in Harlow. Infrastructure includes transport but also the range of other facilities necessary to support the needs of the community.

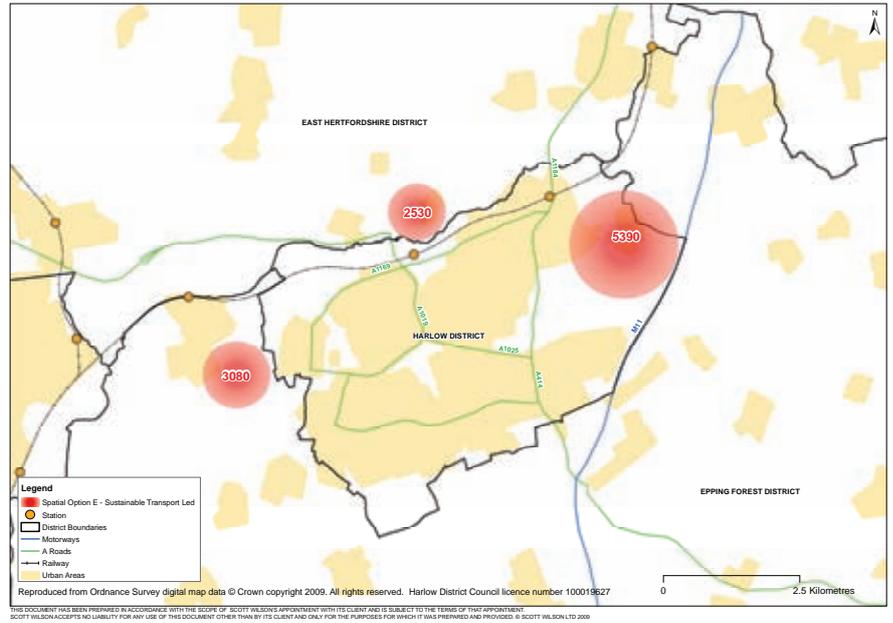
Part 7 of the full consultation document sets out the key infrastructure needed to support new development.

Option E – Sustainable Transport-led

This approach is based on broad locations for new housing and that can benefit from existing or enhanced transport provision.

The consultant suggested that this option is not a reasonable option primarily in light of transport and sewerage constraints associated with high levels of development allocated to urban extensions in the northern half of Harlow.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.17 and 6.7.19 in the full consultation document.

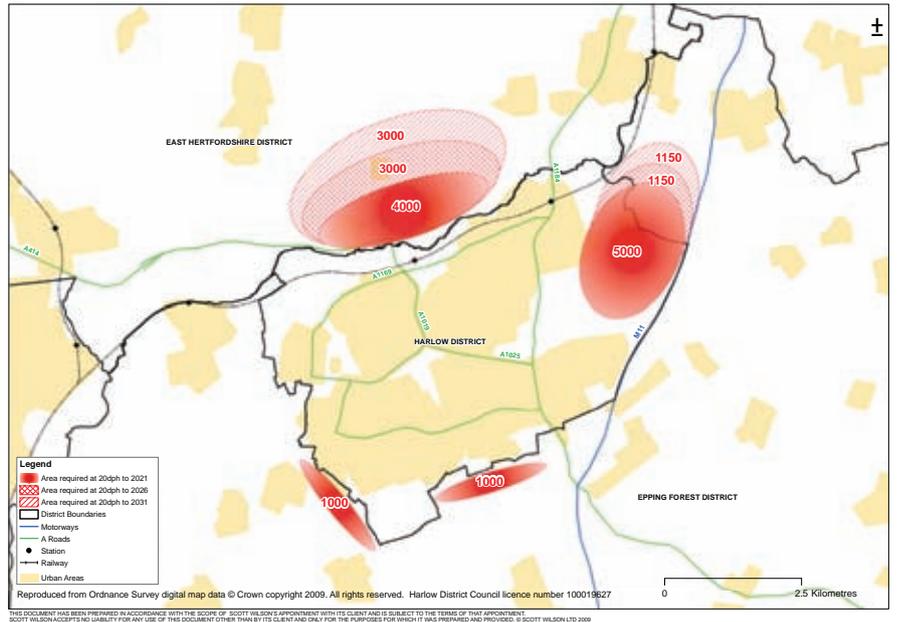


The Consultant's Suggested Spatial Approach

Following examination of the range of potential options described above, and an assessment of their impact on the town, the consultant suggested the following areas to accommodate housing growth around the town:

For a full summary of the consultant's Suggested Approach see Part 6, sections 6.7.20 -6.7.22 in the full consultation document.

What do you think about the recommendations of the Consultant including their "Suggested Spatial Approach" to growth around Harlow?



Do you think all of the key elements of infrastructure have been identified? If not, what additional infrastructure do you think will be needed to support the emerging Core Strategy?

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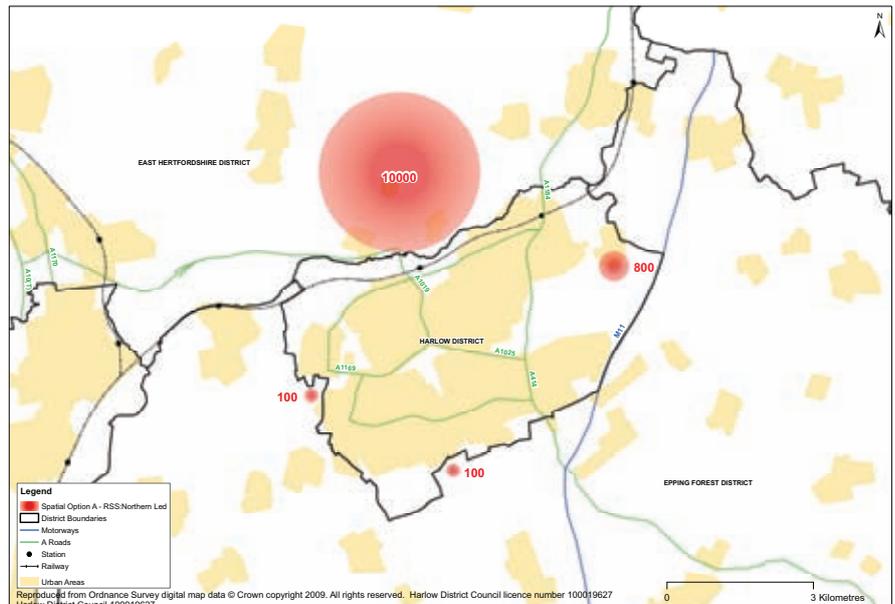
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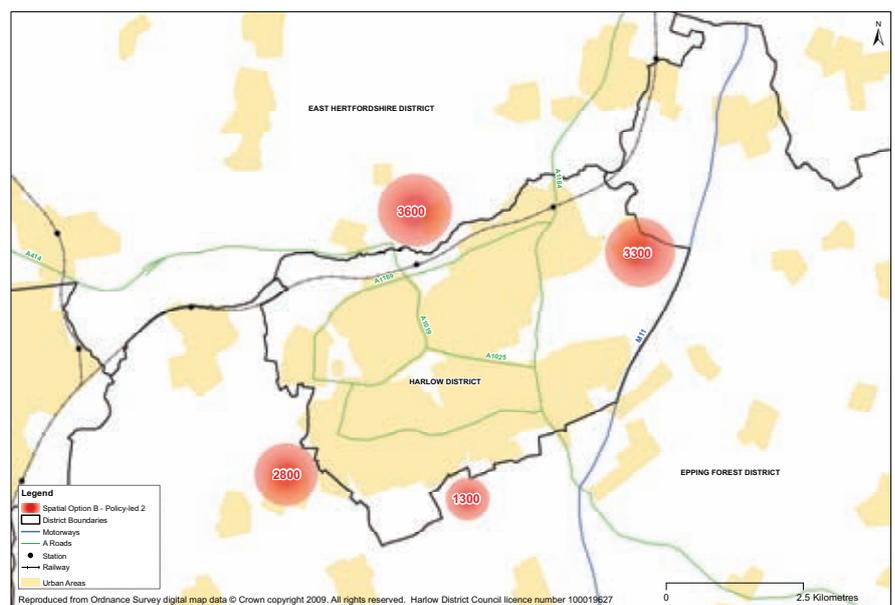


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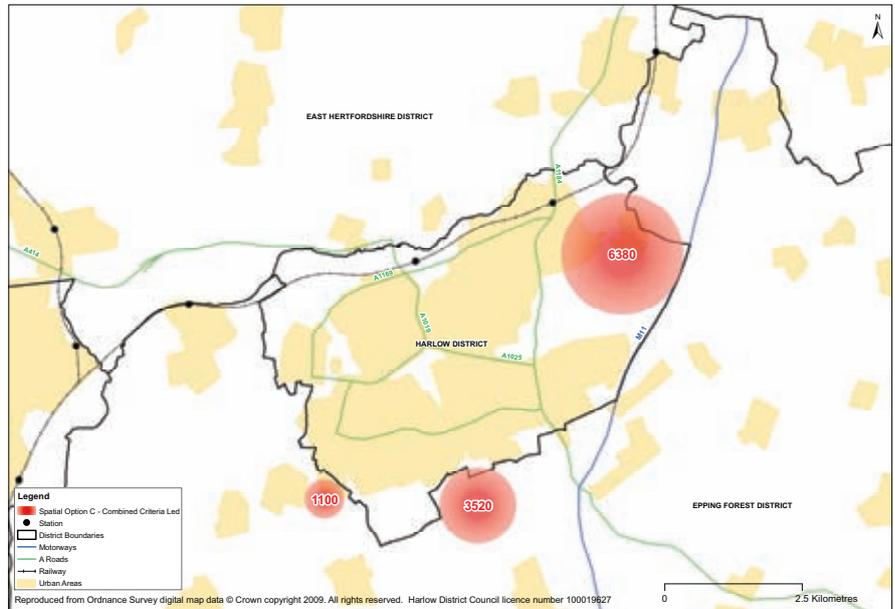


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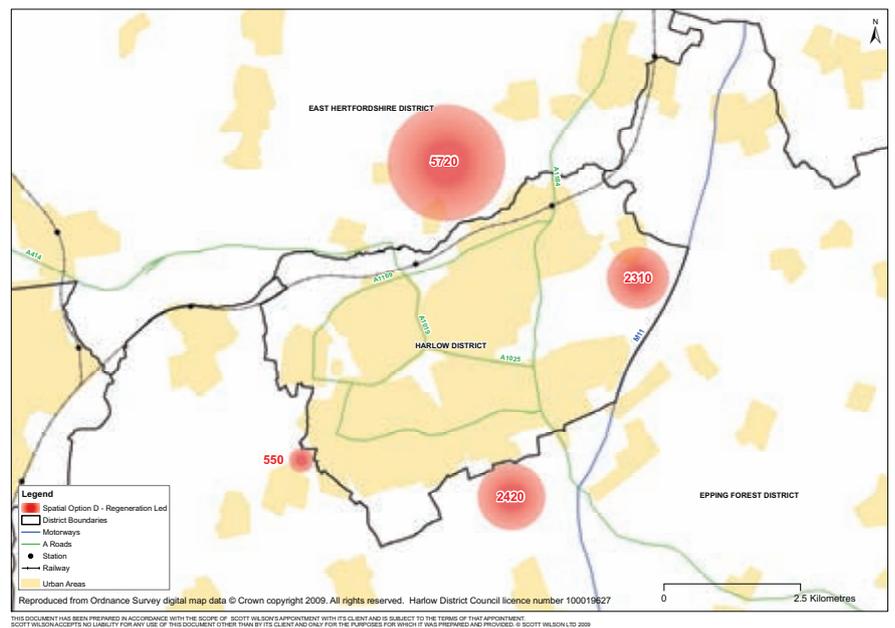


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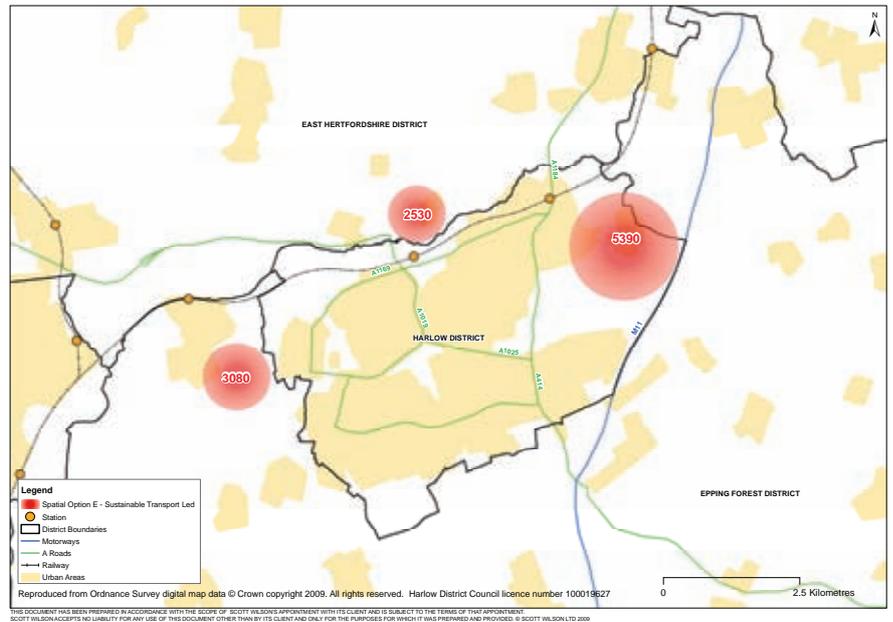
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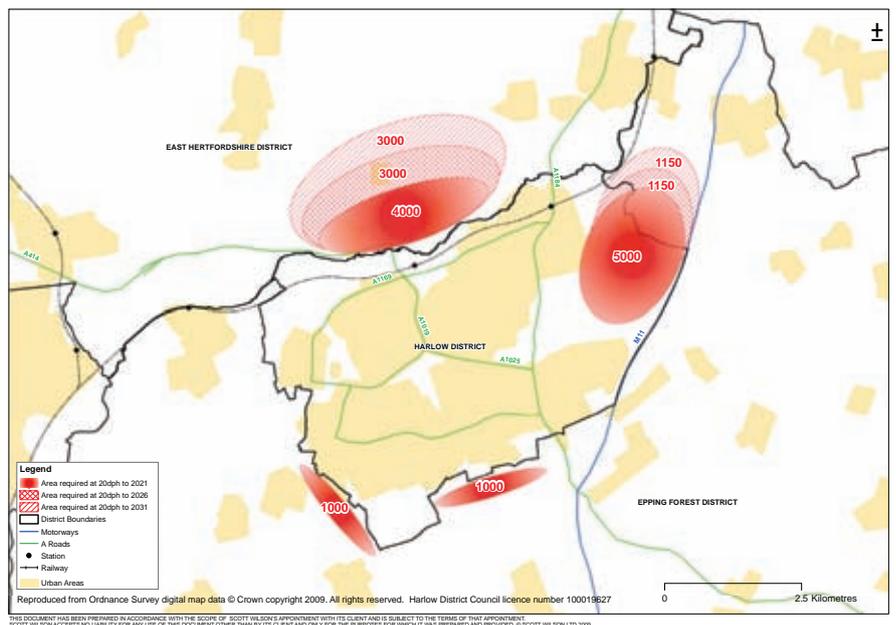


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What do you think about the recommendations of the Consultant including their "Suggested Spatial Approach" to growth around Harlow?



Do you think all of the key elements of infrastructure have been identified? If not, what additional infrastructure do you think will be needed to support the emerging Core Strategy?

Harlow's Core Strategy Issues and Options consultation

Questionnaire

Harlow Council would like to know your views on the Core Strategy Issues and Options consultation document. Your feedback will help to prepare Harlow's final Core Strategy. The Core Strategy is the main planning document in Harlow's emerging Local Development Framework which will guide development in Harlow to 2026 and beyond. For more information about the Core Strategy, please refer to Part 1, sections 1.1 to 1.2 in the consultation document.

Please read the Issues and Options consultation document before responding to the questions.

Where can I view the consultation document?

The Issues and Options consultation document can be viewed online at www.harlow.gov.uk/issuesandoptions

Paper copies of the consultation document are available for inspection during normal office hours at the Civic Centre reception and in local libraries.

Copies of the consultation document can be obtained on CD-Rom by emailing myharlow@harlow.gov.uk or calling the Forward Planning Team on (01279) 446028.

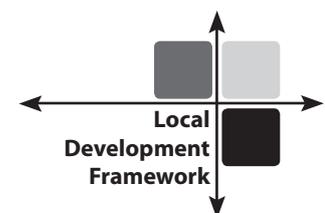
If you would like this questionnaire in a different language or format please call Contact Harlow on 01279 446655 or email myharlow@harlow.gov.uk

Council Officers will be available to help you with this questionnaire if required.

The deadline for responding to the Issues and Options consultation is 5pm on Friday 28 January 2011.

COMPLETING THE QUESTIONS

Please answer the questions by putting a cross in the appropriate box or using the space provided to write your comments. If you need extra space for comments, please use additional paper, clearly number your responses, and attach to your questionnaire using a staple.



The Issues

Question 1 Do you think the Council has identified all the relevant issues that need to be addressed by the Core Strategy? (*Refer to Part 2 of the consultation document*)

Yes No

Question 2 If you disagree, what additional issues need to be considered by the Core Strategy?

The Approach

Question 3 Would the provision of 16,000 new homes in and around Harlow meet the current needs of the local community and help secure the regeneration of Harlow? (*Refer to Part 3 of the consultation document*)

Strongly Agree Agree Neutral Disagree Strongly Disagree

Question 4 If you disagree/strongly disagree, what do you think the scale of growth should be, ensuring that the Core Strategy addresses the particular issues facing Harlow?

Question 5 Do the visions and priorities set out in the Community Strategy, the Council's Regeneration Strategy and the Council's Corporate Plan provide the basis to develop the vision for Harlow's Core Strategy? *(Refer to Part 4 of the consultation document)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Question 6 If you disagree/strongly disagree, what do you think the vision for the Core Strategy should be based on?

Question 7 Do you think the Core Strategy Themes cover the range of planning issues in Harlow? *(Refer to Part 4, section 4.3 to 4.4)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Question 8 If you disagree/strongly disagree, what changes would you make to the Themes to ensure they address the range of planning issues in Harlow?

Question 9 Do the Strategic Objectives provide the necessary framework to deliver the regeneration of Harlow? *(Refer to Part 4, section 4.5)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Question 10 If you disagree/strongly disagree, what changes would you make to the Strategic Objectives?

Question 11 Do you think the policy areas identified cover the range of issues that are relevant to the regeneration of Harlow? (*Refer to Part 4, section 4.7*)

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>				

Question 12 If you disagree/strongly disagree, what changes would you make to the policy areas?

Development Principles

Question 13 Do you agree that new development should be directed to areas that will maximise regeneration of the town? (*Refer to Part 5, sections 5.1 to 5.2*)

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>				

Question 14 Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority) (Refer to Part 5, section 5.4 in the consultation document)

Around public transport hubs (railway station, bus station and bus stops)	<input type="checkbox"/>	Hatches	<input type="checkbox"/>
		Neighbourhood Centres	<input type="checkbox"/>
At appropriate locations within neighbourhood areas	<input type="checkbox"/>	Within the Town Centre	<input type="checkbox"/>

Question 15 Should the Council consider underused open spaces and other undeveloped land for development before considering releasing land in the Green Belt? (Refer to Part 5, section 5.5 and Appendix 1 in the consultation document)

Strongly Agree Agree Neutral Disagree Strongly Disagree

Question 16 The Green Wedges have performed a variety of roles in shaping Harlow. Should the roles of Green Wedges be reviewed to meet future development needs in the Harlow area? (Refer to Part 5, section 5.6 in the consultation document)

Question 17 Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority) (Refer to Part 5 in the consultation document)

Areas with good access to public transport and other services and facilities	<input type="checkbox"/>
Developing underused green spaces	<input type="checkbox"/>
Maximising the use of previously developed land	<input type="checkbox"/>
Meeting regeneration goals	<input type="checkbox"/>
Protecting Green Wedges	<input type="checkbox"/>
Protecting important landscapes	<input type="checkbox"/>
Protecting the Green Belt	<input type="checkbox"/>
Where there is existing infrastructure capacity	<input type="checkbox"/>

Question 18 Do the existing employment areas meet current and future employment needs? *(Refer to Part 5, section 5.9 in the consultation document)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Question 19 If you disagree/strongly disagree, please explain and what changes you think should be made to Harlow's employment areas?

Question 20 How do you think Harlow Council should shape future shopping development within the Town? *(Refer to Part 5, section 5.10 in the consultation document)*

Spatial Options for Growth Around Harlow

Question 21 What is your view on the consultant's recommendations regarding Option A? *(Refer to Part 6 in the consultation document)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Any further comments?

Question 22 What is your view on the consultant's recommendations regarding Option B? (Refer to Part 6 in the consultation document)

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Any further comments?

Question 23 What is your view on the consultant's recommendations regarding Option C? (Refer to Part 6 in the consultation document)

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Any further comments?

Question 24 What is your view on the consultant's recommendations regarding Option D? (Refer to Part 6 in the consultation document)

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Any further comments?

Question 25 What is your view on the consultant's recommendations regarding Option E? (*Refer to Part 6 in the consultation document*)

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Any further comments?

Question 26 What is your view on the consultant's Suggested Approach to accommodating growth around Harlow? (*Refer to Part 6 in the consultation document*)

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

Any further comments?

Question 27 Do you have any other comments on the approach to growth around Harlow?

Question 28 Do you think all the key elements of infrastructure necessary to support the emerging Core Strategy have been identified? (Refer to Part 7 of the consultation document)

Yes No

Question 29 If no, what additional infrastructure do you think is needed to support the emerging Core Strategy?

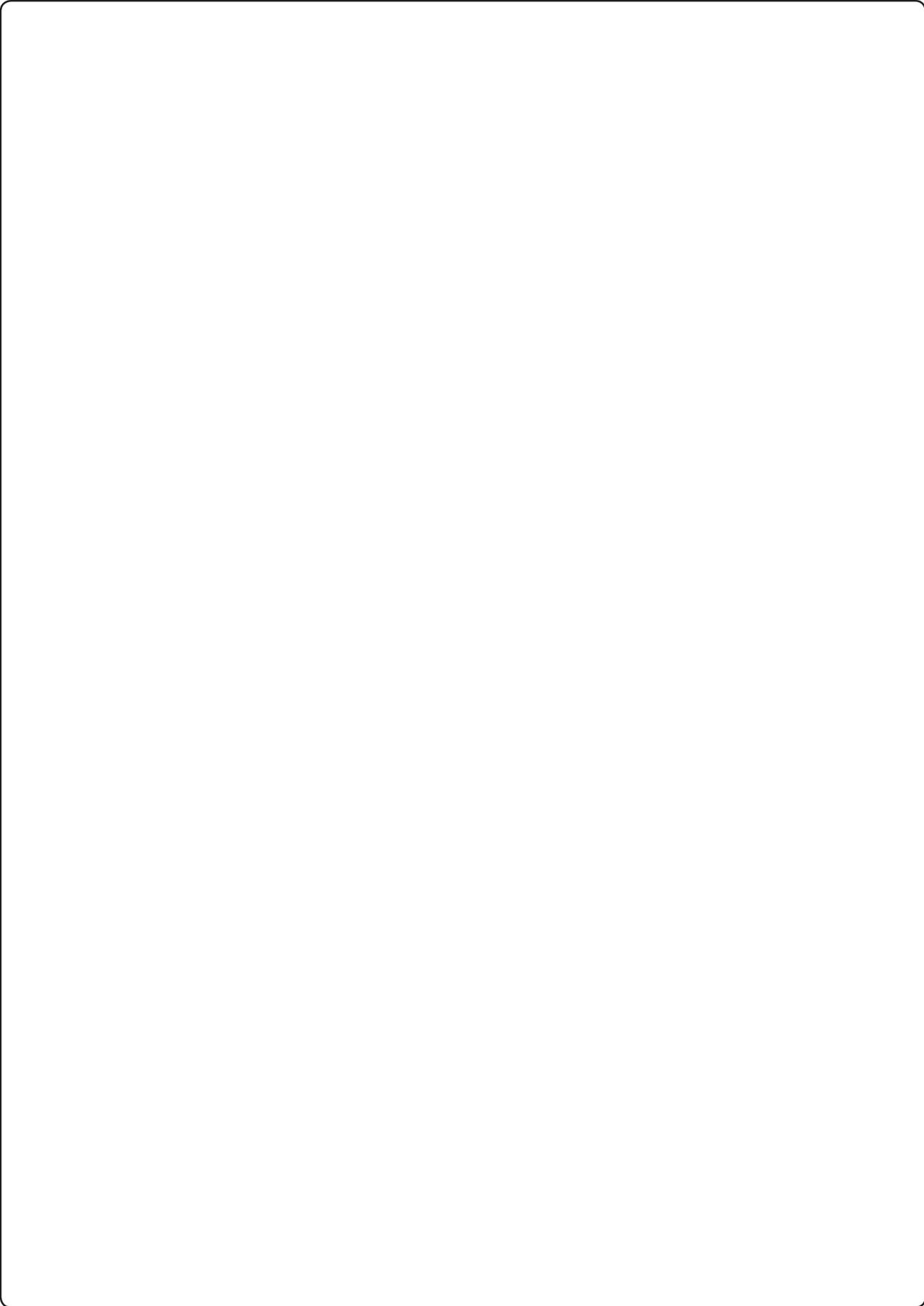
Question 30 Please rank, in order of priority, how Harlow Council should tackle Harlow’s congestion problems (1 = highest priority, 9 = lowest priority) (Refer to Part 7 in the consultation document)

Encourage use of public transport for work and leisure (Travel Planning)	<input type="checkbox"/>
Improve access to the town centre by sustainable modes of transport (cycle / bus)	<input type="checkbox"/>
Improve connections from Harlow to the Strategic Road Network (M11, A414)	<input type="checkbox"/>
Improve walking and cycling routes within the town	<input type="checkbox"/>
Manage future parking provision across the town	<input type="checkbox"/>
Measures to improve traffic flow along strategic routes and at roundabouts within the town	<input type="checkbox"/>
Public transport improvements	<input type="checkbox"/>
Rail enhancements	<input type="checkbox"/>
Other (please state below)	<input type="checkbox"/>

.....

Question 31 Do you have any further comments to make, at this stage, on how Harlow should be developed? (Please use a continuation sheet if necessary)

A large, empty rectangular box with a thin black border, intended for the user to provide their comments on how Harlow should be developed. The box is currently blank.



Your Contact Details

Please provide your full contact details (if not, your responses may not be considered).

Organisation / Company Name (if appropriate)

Job Title (if appropriate)

Title First Name Surname

Address

.....

Post Code Agent (Yes/No)

Telephone Email (Preferable)

Harlow Council would like to add you to Harlow's Local Development Framework (LDF) Database. The Council can then keep you informed about future consultations on Harlow's emerging LDF and other planning policy documents.

If you do not wish to be added to the Council's LDF Database, please tick the opt-out box.

Privacy Notice

The purpose of the LDF Database is to collect information about interested people and organisations who would like to be informed or consulted on Harlow's LDF and any other planning policy documents prepared by Harlow Council. By providing your contact details on this questionnaire you are happy for your personal data being transferred on to Harlow's LDF Database. It may be used to contact you in future to participate as part of the LDF process. The data may be held for the duration of this LDF up to and probably beyond 2021.

How to return your completed questionnaire:

You can hand deliver your completed questionnaire at the Civic Centre reception or post it to:

Issues and Options Consultation
Forward Planning Team - Harlow Council
Civic Centre
The Water Gardens
Harlow CM20 1WG

Alternatively, submit your responses via the online consultation portal: <http://harlow.jdi-consult.net/ldf/>

Please note:

- * By responding you are giving your consent to the Council to hold and process your personal data in accordance with the requirements of the Data Protection Act 1998;
- * Your comments will be available for others to view at the Council's offices; and
- * The data gathered through this Issues and Options consultation will be held for the duration of this LDF up to and probably beyond 2026.

Responses must be returned to the Council by 5pm on 28 January 2011.

Harlow's Core Strategy Issues and Options consultation

Equalities Monitoring Form (optional)

The Equality Act 2010 requires Harlow Council to carry out its equality duty. All public bodies must think about treating people from different groups fairly and equally.

Harlow Council has to consider the needs of:

- People of different ages
- Lesbian, gay and bisexual people
- People who have changed their sex or are in the process of doing so
- People with a religion or belief, and without a religion or belief
- Women having a baby, and women just after they have had a baby, including breastfeeding
- People of different race
- People of different gender
- People with disabilities
- People of socio-economic disadvantage

Harlow Council would like you to volunteer your personal information to ensure that people from all groups have been included in Harlow's Core Strategy Issues and Options consultation.

Confidentiality

Please help the Council by volunteering your equalities monitoring data on this monitoring form.

The purpose of this monitoring form is to obtain statistical data that will enable the Council to assess how representative of the community Harlow's Core Strategy Issues and Options consultation has been.

All equality and diversity monitoring data is anonymous and will only be used only for statistical analysis.

- Information provided is confidential under Data Protection legislation.
- Information is not passed on to anyone else and is not used to check nationality or citizenship status.
- You are not obliged to provide this information - but it is the Council's duty to ask questions!

Diversity is a key strength in any community or organisation. By knowing the community better Harlow Council is able to ensure equal access to services.

Gender, Age and Gender Orientation monitoring

Are you?

Female Male Transgender

To which age group do you belong?

Under 18 35-44 65-74
 18-24 45-54 75-85
 25-34 55-64 86 and over

Marriage and Civil Partnership monitoring

Are you?

Single Married Civil Partner

Race and Ethnicity monitoring

What is your ethnicity?
 (Classification of ethnic groups from Census 2001)

White - British	<input type="checkbox"/>	Asian or Asian British - Indian	
White - Irish	<input type="checkbox"/>	Asian or Asian British - Pakistani	<input type="checkbox"/>
Other White background	<input type="checkbox"/>	Asian or Asian British - Bangladeshi	<input type="checkbox"/>
Mixed - White and Black Caribbean	<input type="checkbox"/>	Other Asian background	<input type="checkbox"/>
Mixed - White and Black African	<input type="checkbox"/>	Black or Black British - Caribbean	<input type="checkbox"/>
Mixed - White and Asian	<input type="checkbox"/>	Black or Black British - African	<input type="checkbox"/>
Other Mixed background	<input type="checkbox"/>	Chinese	<input type="checkbox"/>
Other Ethnic background	<input type="checkbox"/>	Other Black background	<input type="checkbox"/>
Prefer not to reply	<input type="checkbox"/>		

If other, please specify

.....

Gender Orientation monitoring

How would you describe yourself as?

Heterosexual (straight)
 Homosexual (gay)
 Lesbian
 Bi-sexual

Disability Monitoring Self Description

Do you consider yourself to have a physical or sensory impairment or disability?

Yes No

Do you consider yourself to have a mental impairment or disability?

Yes No

Religion and Belief monitoring

What is your religion?

Buddhist	<input type="checkbox"/>	Sikh	<input type="checkbox"/>
Christian	<input type="checkbox"/>	None	<input type="checkbox"/>
Hindu	<input type="checkbox"/>	Other religion or belief	<input type="checkbox"/>
Jewish	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
Muslim	<input type="checkbox"/>		

If other, please specify

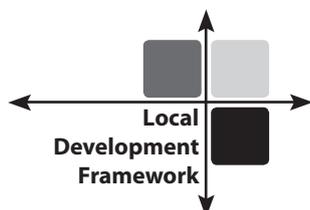
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How to return your completed Equalities Monitoring Form:

Please seal your completed form in the envelope provided and place it in the dedicated Issues and Options Consultation box at the Civic Centre reception or post it to:

Issues and Options Consultation
Forward Planning Team - Harlow Council
Civic Centre
The Water Gardens
Harlow
CM20 1WG

Please return your completed form to the Council by 5pm on 28 January 2011.



HARLOW- see something **different**

Harlow
Council
Working together for Harlow

How would YOU plan Harlow's future?

Have your say!

Harlow Council is preparing a new plan, the Core Strategy, which will shape how Harlow is developed over the next 15 years.

The Council is now consulting on the first stage of Harlow's Core Strategy and we want to hear your views on the key issues affecting Harlow and options for planning the town's future.

To find out more visit the exhibition in the Civic Centre reception or come to one of the exhibitions below.



Housing



Placeshaping



Lifestyles



Infrastructure



Prosperity

Harlow Town Railway Station Tuesday, 23 November 2010 7am - 10am and 4.30pm - 7pm	The Latton Bush Centre Wednesday, 24 November 2010 6pm - 9pm	Summers Leisure Centre Tuesday, 30 November 2010 6pm - 9pm
Great Parndon Community Centre Wednesday, 1 December 2010 6pm - 9pm	Potter Street Community Centre Tuesday, 7 December 2010 6pm - 9pm	Church Langley Community Centre Thursday, 9 December 2010 5.30pm - 7.30pm
Trinity United Reformed Church Wednesday, 15 December 2010 6pm - 9pm	Harlow Town Library Monday 20 December - Friday 31 December 2010 Static exhibition display during normal library opening times	
Moot House, The Stow Tuesday, 4 January 2011 7pm - 9pm	St. John's Arc, Old Harlow Tuesday, 11 January 2011 6pm - 9pm	The Harvey Centre, Harlow Wednesday, 12 January 2011 9am - 5pm

Consultation ends 5pm on 28 January 2011



www.harlow.gov.uk/issuesandoptions

HARLOW - see something different



BBC Local

Essex

Things to do

People & Places

Nature & Outdoors

History

Religion & Ethics

Arts & Culture

BBC Introducing

TV & Radio

Local BBC Sites

[News](#)

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[Weather](#)

[Travel](#)

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[England](#)

Page last updated at 15:03 GMT, Tuesday, 23 November 2010

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Harlow commuters have their say on future of the town

Commuters at Harlow Town station have been given the chance to say how they would improve the town as a more viable place to work as well as live.



A number of consultation road shows will be held between now until January

Nearly 15,000 people commute out the town according to Harlow Council, which has begun a 10-week consultation on the future development of the town.

"We don't want to be a dormitory town," the Conservative council leader Andrew Johnson told BBC Essex.

"We want people to take part in the whole life of the town."

People waiting for their trains on Tuesday, 23 November were given an eight-page leaflet about the future development of the town.

As part of the authority's 'Issues and Options' strategy, the people of Harlow are being asked how they think the town's housing, employment and infrastructure could be improved over the next 15 years.

In particular, it is keen to discover what type of jobs people travelling to London and Cambridge do.

"About 2000 people leave each day to work elsewhere," said Cllr Johnson.

"So we're particularly interested to hear what they think could be done to improve the town in terms of employment, in terms of infrastructure and housing growth.

“ By being close to London we could provide a better environment for companies who don't want to be in the hustle and bustle ”
Cllr Andrew Johnson, leader of Harlow Council

The council is also looking to make the town more attractive to businesses from outside the area.

"We want to know where they would put those employment areas and where they would put the additional infrastructure to support those employment areas," he said.

"There's the possibility that by being close to London we could provide a better environment for companies who don't want to be in the hustle and bustle," he said.

"We are an attractive place, we're close to the M11, in between London and Stansted Airport so have very good transport links.

"We want to know where they would put those employment areas and where they would put the additional infrastructure to support them."

More information on the consultation can be found on the [Harlow Council website](#).

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Core Strategy Issues and Options

Consultation Summary Report

February 2012



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INTRODUCTION

Purpose of this Summary Report

This report summarises the issues raised, and analyses the responses received, in relation to Harlow's Core Strategy Issues and Options consultation which took place during the 10 weeks from 22 November 2010 to 28 January 2011.

It is intended that the comments received from this consultation will assist Harlow Council as it prepares Harlow's Core Strategy; the new overarching planning document that will set out the spatial planning strategy guiding future development in the Harlow District up to and beyond 2026, and supporting the regeneration of the town. This document therefore forms part of the evidence base for Harlow's Core Strategy and is available to view and download at www.harlow.gov.uk/issuesandoptions.

This Issues and Options Consultation Summary Report is a factual document and the majority of the text and charts that appear on the following pages are designed to illustrate the main issues raised and analyse the responses received to the 'closed' and 'open-ended' questions that were contained within the Consultation Document (see section 1.3). To assist with the analysis of the responses, individual representations have been grouped together into relevant issues however please note that in identifying groups of issues individual representations have been subject to interpretation. It should also be noted that it is not the purpose of this report to provide officer responses to individual representations.

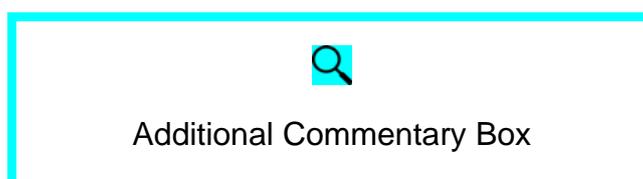
Format of this Document

This Summary Report is split into 3 sections:

- **Section 1** summarises the background to the consultation, explains the consultation process and provides an analysis of the overall response.
- **Section 2** provides an analysis of the responses to the 31 questions contained in the consultation document.
- **Section 3** sets out how the results from this consultation will be used to inform the next stage in the preparation of Harlow's Core Strategy.

A more detailed breakdown of the consultation results is contained in Appendices 1 – 6.

At certain points throughout Section 2 there are boxes (like the one below) which contain additional commentary on the consultation responses. These comments do not constitute formal officer responses to the consultation results but have been included where it is felt that the responses needed clarification.



All the representations made in relation to the consultation can be viewed on the Council's website at <http://harlow.jdi-consult.net/ldf> or in person at the Civic Centre.

1.0 Core Strategy Issues and Options Consultation Document

1.1 Background

The Issues and Options consultation was the first stage of Harlow's Core Strategy. The Core Strategy is the main Development Plan Document (DPD) in the town's emerging Local Development Framework (LDF). The LDF, which will eventually replace Harlow's existing Adopted Replacement Local Plan 2006, is a series of documents that will guide planning and development in Harlow up to 2026 and beyond. The nature of these may be reviewed however following the enactment of the Localism Act in November 2011.

The Core Strategy will set out the overarching spatial planning framework guiding development across the Harlow District, setting out the long term vision and objectives for the town. It will set out the principles that will protect the environment and guide the development of new homes, shopping, employment opportunities and infrastructure necessary to meet the needs and aspirations of the community. The Core Strategy will also provide the strategic framework for other detailed planning guidance being produced as part of the LDF. The documents being produced to create Harlow's LDF are illustrated on Harlow Council's dedicated LDF website page at www.harlow.gov.uk/ldf

There will be a number of stages in the preparation of Harlow's Core Strategy involving several rounds of public consultation. The stages of Harlow's Core Strategy preparation are set out in the following diagram:



The Issues and Options consultation followed a number of "initial" frontloading consultation exercises conducted between September 2007 and December 2009. This helped inform the content of the Issues and Options consultation document. Feedback from the 'initial frontloading' consultation work undertaken can be viewed on the Council's website at www.harlow.gov.uk/ldf (follow the links to 'Core Strategy' and then 'LDF awareness raising and evidence gathering'). A number of technical evidence base documents also informed the content of the Issues and Options document which can be viewed at www.harlow.gov.uk/ldf (follow the link to 'Evidence Base').

The consultation document sought views on the vision, themes and objectives that are being used to develop the Core Strategy. The document set out for consideration possible policy areas together with principles that would guide future development. It also included a consultant's assessment of five potential growth options around Harlow based on the policies set out in the East of England Plan. Although the East of England Plan will be withdrawn, the consultant's suggested growth options were included in the consultation document to allow the public and stakeholders to comment on broad options for growth around the town. The inclusion of the spatial options was a starting point to ensure that a range of potential options that could meet Harlow's current and future development needs were considered. The consultation intended to allow the public and stakeholders an early opportunity to identify strengths and weaknesses of the potential spatial options and not as a referendum on which option should be progressed. It also did not preclude the suggestion of alternative growth options and many respondents took the opportunity to make other suggestions in this consultation.

1.2 National Planning Context

Since the consultation took place the Government has provided more detail on the changes it proposes to make to the planning system. This is set out in the Localism Bill which is expected to be enacted in November 2011. Further guidance is also set out in the draft National Planning Policy Framework. One of the key changes is the abolition of Regional Strategies including the East of England Plan which means that this will no longer form part of the statutory development plan guiding development and change in Harlow. As the Council continues to prepare its plan for Harlow it will be necessary to respond to the provisions in the Localism Bill and incorporate the proposed changes to national planning policy being developed in the National Planning Policy Framework. This may require key elements of the evidence base to be reviewed to ensure a robust assessment of local social, economic and environmental conditions are fully understood. This may necessitate further public consultation before the Council's preferred strategy is submitted to the Government for public examination and final adoption.

1.3 Consultation Process

Public consultation is a key part in the development of Harlow's Core Strategy and Harlow Council is committed to involving the community in the preparation and development of all local planning policy documents in accordance with the methods set out in its adopted Statement of Community Involvement (SCI) 2007. An extensive and rigorous public consultation exercise was undertaken to publicise the Issues and Options document. The consultation period lasted for 10 weeks from 22 November 2010 to 28 January 2011. This exceeded the Council's commitment, set out in its SCI (page 10), to publish the Issues and Options document for public consultation for 6 weeks. A longer consultation was organised in recognition that consultation was run over the Christmas/New Year periods.

The Issues and Options consultation was structured around 31 questions consisting of a mixture of 'closed' (Yes/No, Agree/Disagree, Rank-Order) and 'open-ended' questions.

An 8-page Summary Leaflet was produced summarising the Core Strategy Issues and Options consultation document including the key issues, options for guiding future development and the consultant's suggested growth options. Care was taken to make sure readers were aware that the Summary Leaflet did not include all of the issues or

details that they may have wanted to comment on and so should not have been relied upon solely as the basis of any responses that were made.

Representations were received in the form of paper questionnaires, letters and emails, and via the Council's online planning consultation portal. After the consultation ended all the representations were uploaded into the consultation portal and can now be viewed online at <http://harlow.jdi-consult.net/ldf/> The main report is therefore a summary of the main issues raised and an analysis of the responses received to the 31 questions.

The Issues and Options Consultation Document was subject to Sustainability Appraisal (incorporating Strategic Environmental Assessment) and The Habitats Regulations Assessment Screening Opinion as required under European law. Sustainability Appraisal systematically assesses the social, environmental and economic effects of policies and proposals contained within the Core Strategy and forms an integral part of the plan making process. The Issues and Options Sustainability Appraisal Report (SA) and the Habitats Regulations Assessment Screening Report (HRA) were prepared by consultants Scott Wilson Ltd and published separately for consultation so the public and stakeholders could make comments. Both documents were available to view online and hard copies were available at the Civic Centre, at all Harlow Libraries and at the community exhibitions. A summary of the responses received in relation to the SA are summarised in Appendix 3. Further appraisals will be carried out as the plan develops ensuring that sustainability considerations inform the development of policies and proposals.

An optional Equalities Monitoring Form was produced to collect demographic information about the respondents. This was designed to help identify any underrepresented groups so that an assessment can be made as to the best methods of targeting them in future consultations. An analysis of the demographic information collected in relation to this consultation is available to view in Appendix 5.

Care was taken to ensure all key stakeholders were engaged including residents, businesses and local/hard to reach groups, and that the consultation had regard to the latest regulations and guidance for consultation on Core Strategies. A summary of the main consultation activities that took place are set out below:

Notification Methodology:

- All consultees on Harlow Council's LDF Database were notified about the consultation directly by letter or by email. This included specific (statutory) consultees, neighbouring district, town and parish council's and the Harlow Civic Society (approx 1,800 contacts). See Appendix 7.1 to view a copy of the generic letter sent to LDF Database contacts.
- Bespoke letters together with copies of the Consultation Document, Summary Leaflet and Questionnaire, were sent to hard-to-reach groups including ethnic minority groups, faith groups, local schools, disability groups and sheltered housing tenants. See Appendix 7.2 to view a copy of a bespoke letter.
- CD-ROMs including electronic copies of the Consultation Documents and Summary Leaflet were sent to specific (statutory) stakeholders including East Herts and Epping Forest District Councils and to Essex County Council.
- CD-ROMs including electronic copies of the Consultation Documents and Summary Leaflet were sent to all Harlow Council Members.
- Members of the Harlow & District Chamber of Commerce were notified about the consultation via their monthly e-newsletter (December 2010).

- Hard copies of the Consultation Document were sent to all Members of the Council's LDF Panel and Environment Policy Working Group.

Community Exhibitions:

- Community exhibitions were held at 10 locations across Harlow between 23 November 2010 and 12 January 2011 to enable local residents and other stakeholders to find out more about the LDF process and growth options included in the document (see Appendix 7.3).
- A permanent exhibition was located in the Civic Centre Reception throughout the consultation period (22 November 2010 – 28 January 2011).

Press and Publicity

- A media briefing was held at the Civic Centre on Monday 15 November 2010 with Councillors Eddie Johnson and Tony Hall and planning officers to launch the public consultation exercise. The briefing was attended by reporters from BBC Radio Essex, Heart FM Radio, Harlow Star and Harlow Scene. A press release announcing the commencement of the consultation was distributed to media at the briefing and to other media contacts on the day. A copy of the press release can be viewed in Appendix 7.4.
- Extensive media coverage was received on the consultation including news stories on BBC Look East, BBC Essex Online and in local newspapers: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/forward_planning/local_development_framework/core_strategy/issues_and_options/ldf_media_coverage.aspx
- A feature article was published on the Council's LDF web page and a news banner was placed on the Council's website homepage.
- A full page advert raising awareness of the consultation document and public exhibitions was printed in the Harlow Star and Harlow Scene newspapers (18 November 2010). See Appendix 7.5 to view a copy of the newspaper advertisement.
- A double-page feature article about the consultation appeared in Harlow Council's residents' magazine 'Harlow Times' which is delivered to all households in the district (Winter 2010). See Appendix 7.6 to view a copy of the Harlow Times magazine article.
- Posters were displayed in the Civic Centre, in local libraries and in vacant shop windows around Harlow Town Centre. See Appendix 7.5 & 7.7 to view a copy of the consultation posters.
- An article about the consultation was included in the Winter 2010 edition of the Council's LDF e-newsletter. This was distributed to over 600 registered contacts on Harlow's LDF database.

Availability of Documentation:

- The Consultation Document, Questionnaire and Summary Leaflet were available to the public and stakeholders to download online and hard copies were available to view at the Civic Centre, at all Harlow Libraries and at the 10 Community Exhibition venues.
- Additional copies of the Consultation Document, Questionnaire and Summary Leaflet were available to meet any individual requests.
- Copies of the consultation document and questionnaire were also available on CD-Rom which were sent out following requests.

Harlow Youth Council Workshop:

- Although the activities listed above formed the principle elements of the consultation, on 17 January 2011 Forward Planning Officers also attended a meeting with the members of the Harlow Youth Council. This was to ensure that the consultation reached a cross section of age groups within the community.
- A presentation was given to the Youth Councilors to explain the purpose of the Core Strategy and the issues highlighted in the consultation document. Following this a workshop exercise was run to gather feedback the Youth Councilors on the issues that need to be addressed in the town and where new housing could be located. A summary of their responses and a copy of the presentation given at the event is available to view in Appendix 6.1 and 6.2.

1.4 Analysis of Overall Response

Breakdown of Response

A total of 1,913 separate responses were received from private individuals, groups, organizations and developers to the Core Strategy Issues and Options Consultation Document. In response to the open ended questions set out in the consultation document 5,762 individual comments were received. Many of the public responses submitted in respect of the consultation were made by individual's resident outside Harlow District.

Response by Type

A statistical analysis of the overall consultation response has been undertaken including all private individuals, organisations and groups that responded. For the purposes of analysis, all private individuals (STOP Harlow North Campaign members and other individuals) have been divided into four geographically-based groups based on their residential addresses:

- Harlow District Residents
- Adjoining Parishes (in East Herts District) Residents
- Adjoining Parishes (in Epping Forest District) Residents
- Residents from Other Locations

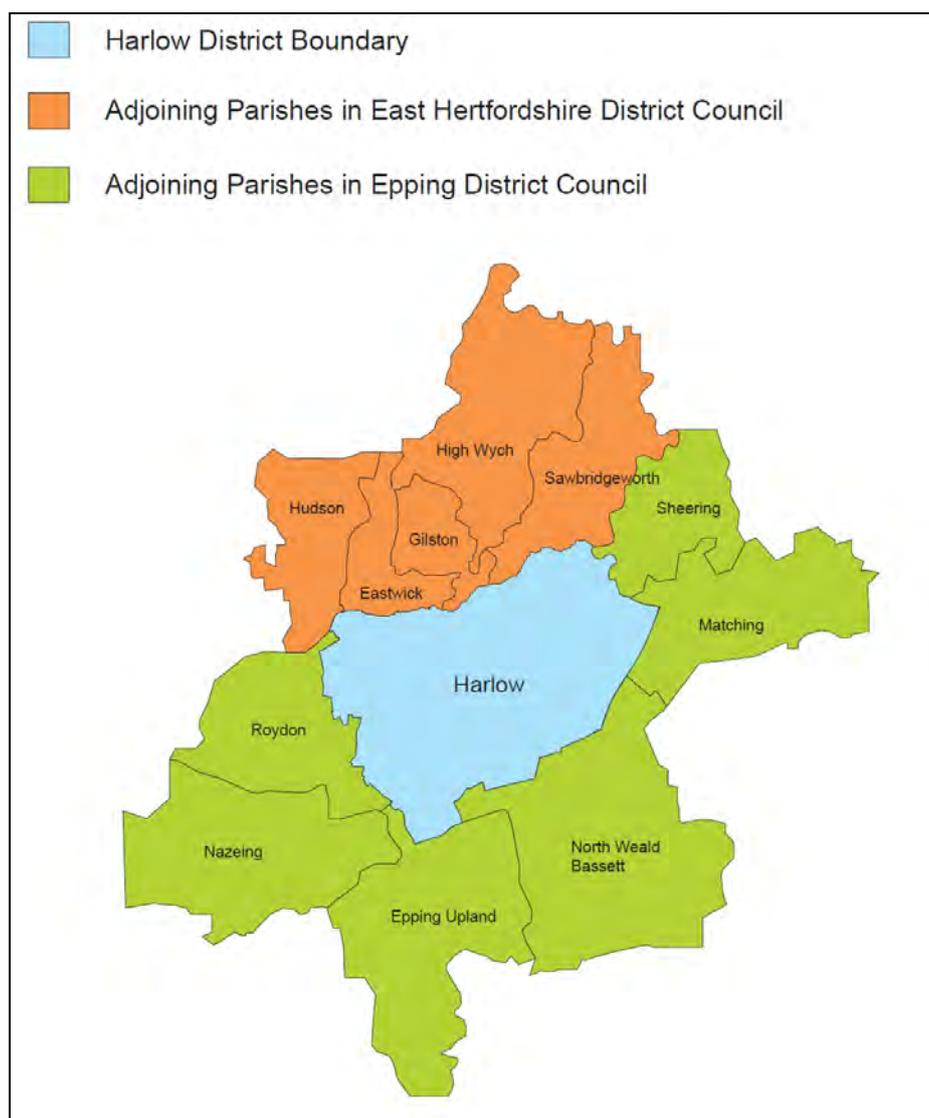
Table 1 presents a breakdown of the private individuals included within each group:

Table 1: Groupings of Private Individuals			
Harlow Residents	Adjoining Parishes East Herts Residents	Adjoining Parishes Epping Forest Residents	Residents from Other Locations
Respondents from: -Harlow District Council	Respondents from: -Hunsdon Parish -Eastwick Parish -Gilston Parish -High Wych Parish* -Sawbridgeworth Parish	Respondents from: -Roydon Parish -Nazeing Parish -Epping Upland Parish -North Weald Bassett Parish -Matching Parish -Sheering Parish	Respondents from: -East Hertfordshire Parishes (excluding those listed above) -Epping Forest Parishes (excluding those listed above) -All other locations (UK and Overseas)

*Although High Wych Parish does not directly adjoin Harlow District its close proximity to the town's northern boundary meant it was deemed appropriate to include its residents within this geographical grouping for the purposes of this analysis only.

The location of the parishes included within the "Adjoining Parishes (East Herts) Residents" and "Adjoining Parishes (Epping Forest) Residents" groups in relation to Harlow's District Boundary is indicated in the following illustrative map (see overleaf).

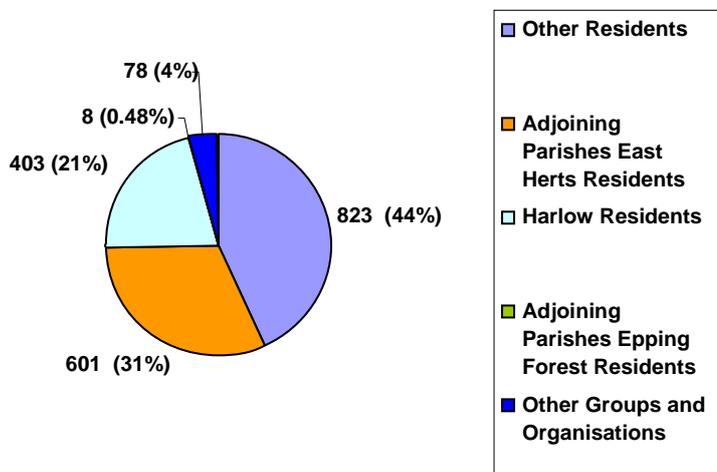
Map 1: Harlow District Boundary in relation to its neighbouring parishes in East Hertfordshire and Epping Forest Districts



Source: Harlow Council

In terms of the overall response, just over 20% (403) of the total responses received were from Harlow-based residents and 31% (601) were from residents of the five adjoining East Hertfordshire Parishes of Hunsdon, Eastwick, Gilston, High Wych and Sawbridgeworth together grouped as 'Adjoining Parishes East Herts Residents' (see Figure 1 on following page 13). 8 responses (0.42%) were received from residents in the six adjoining Epping Forest Parishes to the south and south east of Harlow (Roydon, Nazeing, Epping Upland, North Weald Bassett, Matching and Sheering). 44% (823) of the responses were from residents located in other locations within East Hertfordshire and Epping Forest districts or in other parts of the UK and overseas. The remainder of the responses (78) were from other stakeholders including neighbouring district, parish and town councils, local developers and their agents, other business interests, specific (statutory) consultation bodies (including government bodies) and non-statutory interest groups.

Figure 1: Total Response – All Private Individuals Plus Other Groups and Organisations



Responses relating to a Planning Application affecting land North of Gildea Way

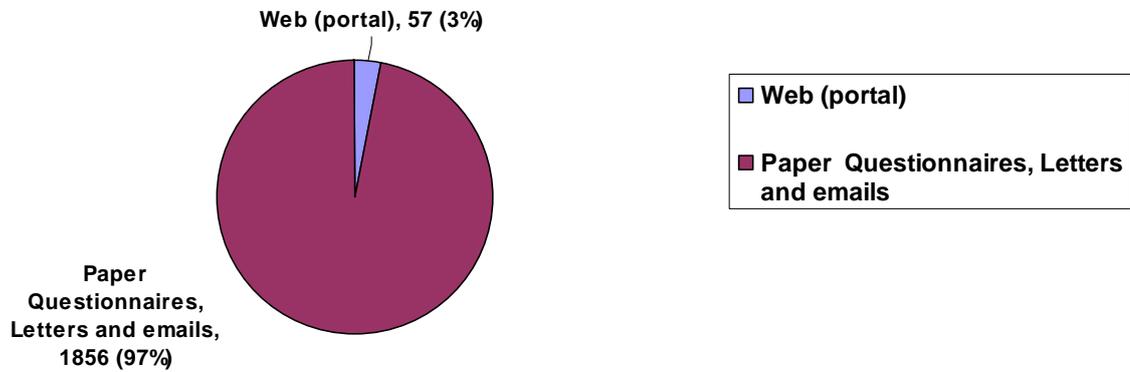
The Issues and Options consultation coincided with developers undertaking a consultation in connection with a planning application on land to the north of Gildea Way. 127 identical responses were received from private individuals who may have seen the consultation as an opportunity to make comments on this site specific issue. However these respondents have not been recognised as a formal group for the purpose of the analysis of these consultation results. The Gildea Way planning application, which was submitted to the Council on 28 February 2011, will be considered against the policies in the current Adopted Replacement Harlow Local Plan (2006) and other material considerations.

Responses by Source

Of the 1,913 responses received, 97% were returned paper questionnaires, letters and emails, and 3% (57) were submitted online through the Council's e-consultation portal (see Figure 2).

Whilst the response via the online portal was quite low it is noted that the Issues and Options consultation was the first major consultation exercise to be run online and a greater proportion of responses is expected to be submitted via the portal for future Core Strategy consultations as individuals and organisations become increasingly familiar with using the system.

Figure 2: Response by source for 1,913 private individuals, groups and organisations



Anonymous Responses

Full contact details were requested to be submitted with all completed paper questionnaires so that respondents could be allocated a unique ID number and their responses could be uploaded by officers into the Council's online consultation portal. This electronic record is necessary in order to provide a transparent audit trail of all responses received and the individuals/organisations they relate to during the various stages of public consultation throughout the preparation of the Core Strategy. It also enables individuals and organisations to view and search for representations online.

Two questionnaires were received anonymously and therefore could not be added to the consultation portal or formally taken into account.

2.0 RESPONSES TO CONSULTATION QUESTIONS

This section of the report begins by presenting an analysis of the number of responses received by consultation question number. It then presents for consideration a statistical analysis of the responses to the ‘closed’ consultation questions and short summaries of the flavour of the ‘critical’ comments received in relation to the ‘open-ended’ questions, most of which are related to the closed questions preceding them.

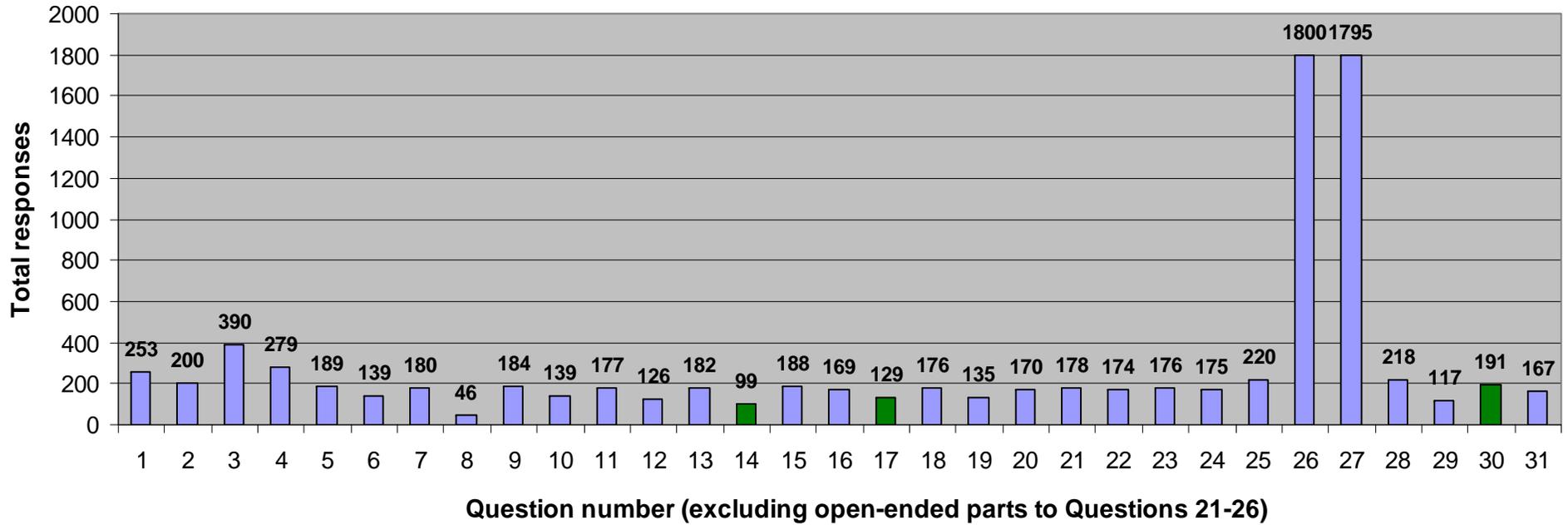
A more detailed statistical analysis of the responses to the closed questions has also been undertaken whereby the overall results have been refined into four sub-groups (as set out in Table 2) to enable a more detailed breakdown of the nature of the respondents. This more detailed analysis, along with more detailed summaries of the issues raised in relation to the open-ended questions, can be found in Appendix 1.

Table 2: Sub-Groups Used to Further Analyse Closed Question Responses in Appendix 1	
Sub-Group Name	Groups/Organisations included in Sub-Group
Sub-Group 1 – Harlow Residents + Community Groups	<ul style="list-style-type: none"> • Harlow Residents • Resident/Community Groups
Sub-Group 2 – Statutory Consultees + Local Groups and Organisations	<ul style="list-style-type: none"> • Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Faith Groups • Local Groups and Organisations • Partner Agencies • Disability Groups • Environmental Groups • Ethnic Minority Groups • Other groups
Sub-Group 3 – Adjoining Parishes Residents + Other residents	<ul style="list-style-type: none"> • Adjoining Parishes (East Herts) Residents • Adjoining Parishes (Epping Forest) Residents • Other Residents
Sub-Group 4 – Local Developers and Agents	<ul style="list-style-type: none"> • Local Developers • Planning Consultancies/Agents

Total Responses by Question

The total responses received by question number are provided in Figure 3. This shows Questions 26 and 27 received by far the highest number of responses (1,806 and 1,795 respectively), however this is attributed to the fact that they were the only questions that the members of the STOP Harlow North Campaign completed and, as noted, this group accounted for 76% of the total responses. Excluding Questions 26 and 27, the remaining questions all received a level of response that was within a range of between 46 and 396 responses, with an average rate of 196 responses received per consultation question.

Figure 3 - Total responses by question

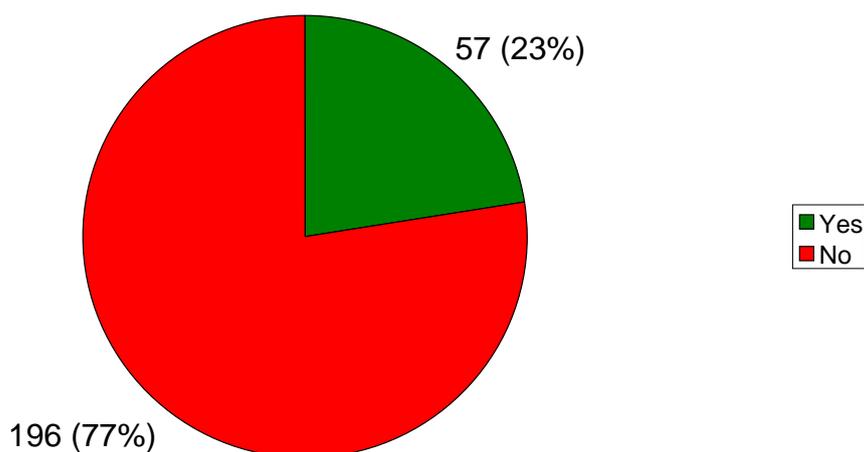


Questions 26 and 27 were responded to by STOP Harlow North Campaign.
 Items in **green** denote rank order questions for which only approximate response numbers are given.

2.1 Summary of Responses – Chapter 2 – The Issues

Chapter 2 of the Issues and options consultation document included two questions designed to collect feedback on the key development issues identified through the ‘initial frontloading’ consultation work and evidence base studies as needing to be addressed by the Core Strategy. The outcome is summarised below. The respondents’ full comments can be viewed online at <http://harlow.jdi-consult.net/ldf/> or in person at the Civic Centre.

Question 1 - Do you think the Council has identified all the relevant issues that need to be addressed by the Core Strategy?



**Figures may not add up to 100% due to rounding.*

(253 Responses)

Overall, respondents strongly indicated that the issues needing to be addressed through the Core Strategy had not been fully covered within the Issues and Options consultation document. 77% of respondents to this question felt that there are other issues needing to be addressed, whereas only 23% felt that the consultation document had picked up all of the key issues. A more detailed statistical analysis of the responses to Question 1 can be viewed in Appendix 1 (page 52).



The majority of respondents felt there were additional issues that should have been addressed by the Core Strategy Issues and Options consultation; however the majority of the additional issues that were suggested were already identified within the consultation document except for climate change and the development needs of faith groups and an ageing population.

Question 2 was designed to collect comments on the additional issues that respondents think should be considered by the Core Strategy.

Question 2 – If you disagree, what additional issues need to be considered by the Core Strategy?

200 comments were made in relation to other issues needing to be addressed by the Core Strategy; however it should be noted that many of the suggested 'additional issues' were already highlighted within the consultation document.

Infrastructure was the single biggest issue identified by the respondents as needing to be addressed. Respondents felt that a range of infrastructure improvements are necessary before any further significant growth takes place in Harlow in order to ensure that any such growth will be sustainable. Areas of infrastructure identified as needing improvement include the road and rail systems, water supply, drainage and sewerage disposal, health and education and community facilities. Comments were made that a by-pass / link road would be needed from the A414 to the M11. Comments were also made that growth will place more pressure on Harlow's existing roads and railway station whilst the development of more roads will damage local communities. Traffic congestion and parking were raised as existing issues needing to be addressed. A concern was also raised that the cumulative impact of growth of East Herts and Epping Forest districts will put more pressure on Harlow's healthcare services and facilities.

Respondents commented that new development should conform to the Gibberd Master Plan and that Harlow's existing green spaces, green wedges and open spaces should be safeguarded for future generations. Comments were also made that existing archaeological sites and agricultural land should be protected, and that the town park should be improved - but not relocated.

Regarding the Built Environment, respondents commented that consideration should be given to the needs of faith groups within the town in relation to any future growth. A number of respondents noted that climate change and sustainability should be key issues for consideration by the Core Strategy, including the need for carbon reduction, energy efficiency, and renewable energy and recycling.

In respect of housing, it was argued that more alternative options for the overall level of growth should have been offered in the consultation document, not simply the figure of 16,000 new homes that was designated for Harlow in the East of England Plan. Some respondents argued that any future growth should only be allowed if it supports local rather than regional housing needs. It was also commented that Harlow has an ageing population so consideration must be given to the requirements for Care Homes, Warden Assisted and sheltered housing and Day Centres for the elderly. A respondent argued that all new dwellings built should recognise the requirements of wheelchair users.

In addition to the general issues highlighted above, two technical comments were made regarding the content of this section of the consultation document. One respondent noted that theatre provision was inappropriately included within the Recreation, Sport, Leisure and Open Space section (Para 2.12.2) as this is guided by PPS4 as a town centre element. It was also noted that the statement in section 2.3 that "Greenfield development should be located in the north and east of Harlow" pre-empted the policy process. A more detailed summary of the comments made in relation to Question 2 can be viewed in Appendix 1 (pages 53 to 58).



The purpose of the Issues and Options consultation document was to set out all the key development issues affecting Harlow gathered from previous consultation work and evidence base studies, and to find out whether respondents agreed or disagreed with these issues or if there were any other issues the Council may have missed which will need to be addressed through the Core Strategy.

Over 250 responses were received in response to this question, almost all of the additional issues raised, with the exception of the three issues below, were already covered elsewhere within the consultation document. The three additional issues that will need to be considered during the preparation of the Core Strategy are:

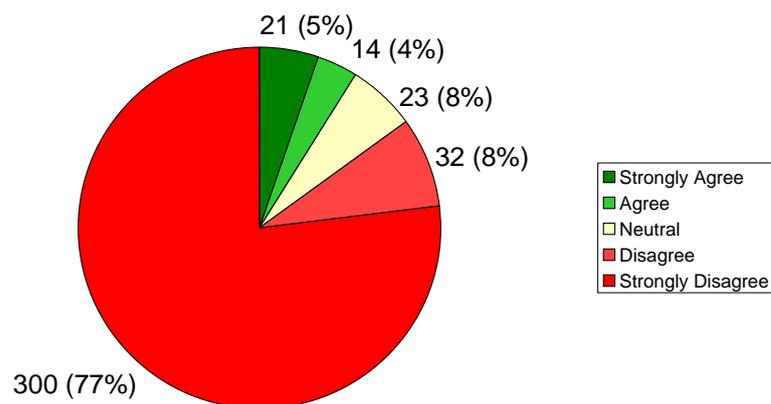
- Climate change mitigation and adaptation
- The development needs of faith groups
- The development needs of Harlow's ageing population

2.2 Summary of Responses – Chapter 3 – The Strategic Challenge

Chapter 3 considered the Council's District-wide approach to housing and regeneration to address the issues facing the town identified in Chapter 2. The need for a significant increase in the level of housing and jobs to generate the critical mass to secure Harlow's role as a key sub-regional centre was identified.

Questions 3 and 4 were designed to test opinion on the proposal in the East of England Plan for the provision of 16,000 new homes in Harlow as a starting point for the level of growth required to meet local needs.

Question 3 – Would the provision of 16,000 new homes in and around Harlow meet the current needs of the local community and help secure the regeneration of Harlow?



**Figures may not add up to 100% due to rounding.*
(390 Responses)

Overall, respondents strongly objected to the proposal put forward in the East of England Plan that 16,000 new homes would help address the underlying issues affecting Harlow by stimulating regeneration and renewal of the town. 85% of the 390 respondents either Strongly Objected or Objected to this proposed level of growth, compared to the 9% of respondents who said either Strongly Agreed or Agreed with this level of growth. A more detailed statistical analysis of the responses to Question 3 can be viewed in Appendix 1 (page 59).

Question 4 was designed to collect comments from respondents who objected to the overall level of growth for Harlow in the East of England Plan on what they thought the overall scale of growth should be.

Question 4 – If you disagree/strongly disagree, what do you think the scale of growth should be, ensuring that the Core Strategy addresses the particular issues facing Harlow?

279 comments were made in relation to this question. Overall there was strong support for meeting local housing needs, but not for the level of growth set out in the East of England Plan, and the housing provided to support local needs should be affordable.

There was no real consensus of how many houses should be provided in the Harlow Area. A few responses proposed a range from 800 to 16,000 to the year 2021 with a further 10,100 to 2031. Generally a range of around 4,000 to 5,000 new dwellings was suggested.

The link between regeneration and growth was questioned.

As indicated elsewhere in the questionnaire it was felt that the town's infrastructure would not be able to support development on the scale envisaged in the East of England Plan. A more detailed summary of the comments made in relation to Question 4 can be viewed in Appendix 1 (pages 60 to 61).



The majority of respondents did not appear to support the growth requirement for the Harlow Area set out in the East of England Plan. Following the withdrawal of the East of England Plan and the Government's publication of the Localism Act the Council is verifying future needs through reviewing the evidence base and the development necessary to address regeneration objectives.

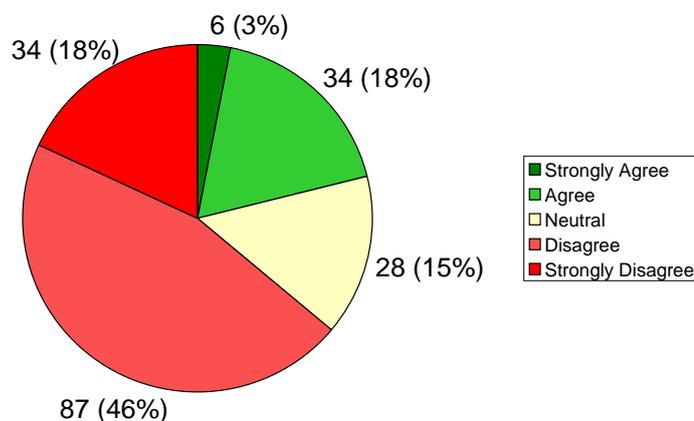
Part of this review will help identify the future housing requirements of the town. In considering the housing needs identified the Council will be also examining the infrastructure benefits that will accrue with different levels of growth. This will take into account the infrastructure provision that has been delivered in Harlow in recent years as a result of being identified as an area for growth.

2.3 Summary of Responses – Chapter 4 – Vision, Themes and Objectives

Chapter 4 included eight questions designed to receive feedback on the draft planning framework including the vision, themes and objectives that are being used to develop the Core Strategy.

Questions 5 and 6 looked at the visions and strategies being used to develop the overarching spatial planning vision for Harlow which will be provided by the Core Strategy.

Question 5 – Do the visions and priorities set out in the Community Strategy, the Council’s Regeneration Strategy and the Council’s Corporate Plan provide the basis to develop the vision for Harlow’s Core Strategy?



**Figures may not add up to 100% due to rounding.*

(189 Responses)

The majority of respondents felt that more consideration needs to be given to the vision being developed for Harlow’s Core Strategy. 64% of respondents Strongly Disagreed or Disagreed that the appropriate visions and priorities had been identified, whilst 21% Agreed or Strongly Agreed with the visions and priorities. A more detailed statistical analysis of the responses to Question 5 can be viewed in Appendix 1 (page 62).

Question 6 was designed to collect comments from respondents who disagreed with the proposed visions being used to develop the Core Strategy vision to find out what they wanted the Core Strategy vision to be based on.

Question 6 – If you disagree/strongly disagree, what do you think the vision for the Core Strategy should be based on?

139 comments were made in relation to the development of the vision for Harlow’s Core Strategy. Many of the respondents felt that the approach based on housing growth of 16,000 homes and 8,000 jobs to provide a critical mass for regeneration had not been proven. These respondents felt that the strategy or vision for Harlow should be based on a more modest increase in growth (to meet local needs) and recognise the difficulties of creating so many jobs. A number of respondents did not believe that providing houses and jobs would regenerate the town.

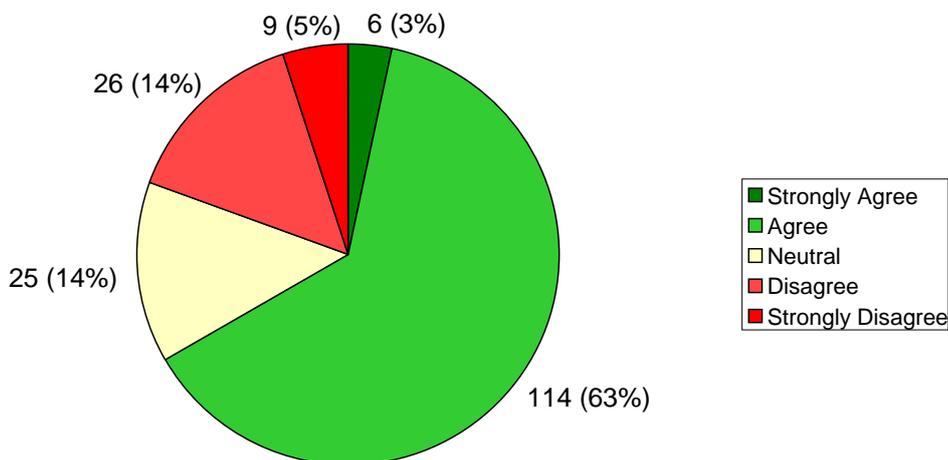
Comments were made that the current vision for Harlow (based on the Community Strategy) is inadequate, that the vision needs to be more ambitious, locally distinctive, and be in no doubt where the town is heading. Comments were also made that the vision should include wider issues that will seek to facilitate regeneration within Harlow. Others commented that regeneration and renewal were important aspects of Harlow’s future and that the vision should be aspirational and not mundane. It was also argued that the vision (and growth options) should include references to the town centre and should be focused on making Harlow a magnet for business. A more detailed summary of the comments made in relation to Question 6 can be viewed in Appendix 1 (pages 63 to 64).



The Vision for the Core Strategy is based on the Council’s Sustainable Community Strategy. This is currently being reviewed and the final vision for the Core Strategy will have regard to the new Sustainable Community Strategy vision focussing on delivering the Council’s corporate priorities and tackling the issues highlighted by the evidence base.

Questions 7 and 8 looked at the themes being used to develop the Core Strategy. Five themes were identified to provide the basis for the development of the spatial strategy policy options – Placeshaping, Housing, Prosperity, Infrastructure and Lifestyles.

Question 7 – Do you think the Core Strategy themes cover the range of planning issues in Harlow?



**Figures may not add up to 100% due to rounding.*

(180 Responses)

Overall, there was general support for the Core Strategy themes, with over 66% agreeing that they reflect the broad range of issues affecting Harlow. A more detailed statistical analysis of the responses to Question 7 can be viewed in Appendix 1 (page 65).

Question 8 was designed to gather comments on any changes that respondents felt should be made to the Council's proposed Themes.

Question 8 – If you disagree/strongly disagree, what changes would you make to the Themes to ensure they address the range of planning issues in Harlow?

46 comments were received in relation to question 8. Of these, many stated that overloaded infrastructure including transport, sewerage, and hospital and GP services were issues that need to be resolved.

It was pointed out that the Themes should deal specifically with recognised topics that more clearly reflect Harlow as a place. This would make it easier for the issues, objectives and policy areas to identify matters that are specific to Harlow.

It was commented that the Themes should include a specific reference to the redevelopment of the town centre and surrounding neighbourhoods. Some commented that the Environment should have its own Theme and include a reference to protecting air, land and water. Others commented there should also be a theme which acknowledges the need for cross boundary working, co-ordination and governance issues.

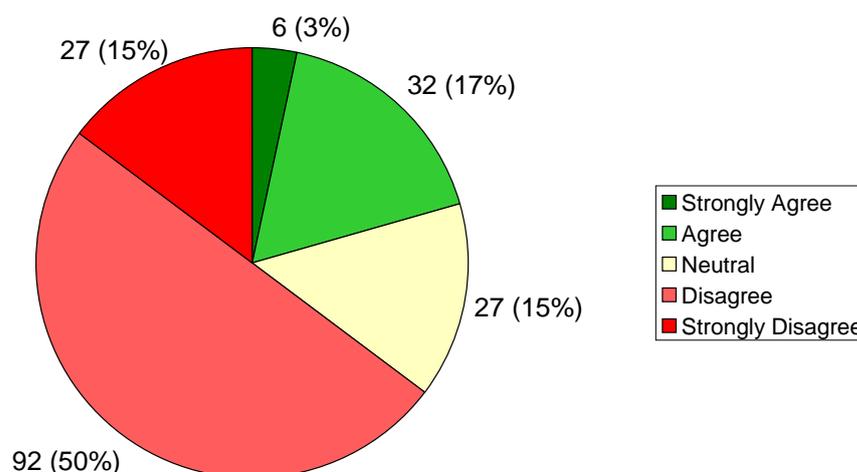
The following matters were also raised: appreciation of the regional purpose of the Green Belt; (the need to contain growth within the bowl of the Stort Valley, protecting the southern ridge line; more prominent and positive support for sustainable construction, carbon reduction and the use of renewable energy; need for formal co-ordinated working with adjoining potentially affected authorities, the setting of the town in relation to surrounding villages, joined up thinking with neighbouring authorities. A more detailed summary of the comments made in relation to Question 8 can be viewed in Appendix 1 (page 66).



There was general support for the existing Core Strategy themes. Some respondents felt that clarity could be improved and reference made to Town Centre redevelopment and cross-boundary working. The themes were devised to assist with the plan making process and the comments will be considered and adjustments made to reflect new issues as they emerge during the preparation of the Core Strategy.

Questions 9 and 10 related to the strategic objectives which will be used to underpin the development of policies and proposals to deliver the planning vision for Harlow. A series of objectives were proposed to address the range of issues identified in Chapter 2 of the consultation document. The proposed strategic objectives were set out in section 4.6.

Question 9 – Do the strategic objectives provide the necessary framework to deliver the regeneration of Harlow?



**Figures may not add up to 100% due to rounding.*

(184 Responses)

Overall, the view from the majority (65%) of respondents was that the strategic objectives would not deliver the vision for Harlow and therefore need to be revisited. However, 20% of respondents agreed or strongly agreed that the objectives would deliver regeneration, whilst 15% were neutral on the matter. A more detailed statistical analysis of the responses to Question 9 can be viewed in Appendix 1 (page 67).

Question 10 was included to gather comments on changes that respondents would like to see made to the strategic objectives.

Question 10 – If you disagree/strongly disagree, what changes would you make to the Strategic Objectives?

139 comments were made in relation to Question 10. Many respondents requested a number of specific changes be made to the Strategic Objectives.

It was also pointed out that the strategy does not state what is to be regenerated other than the Town Centre and there needed to be more focus on the delivery and implementation of the Strategy. It was also mentioned that the objectives should be fully funded before inclusion in the Core Strategy, that housing and employment growth should be linked, and that there should also be a stronger focus on redeveloping the hatches.

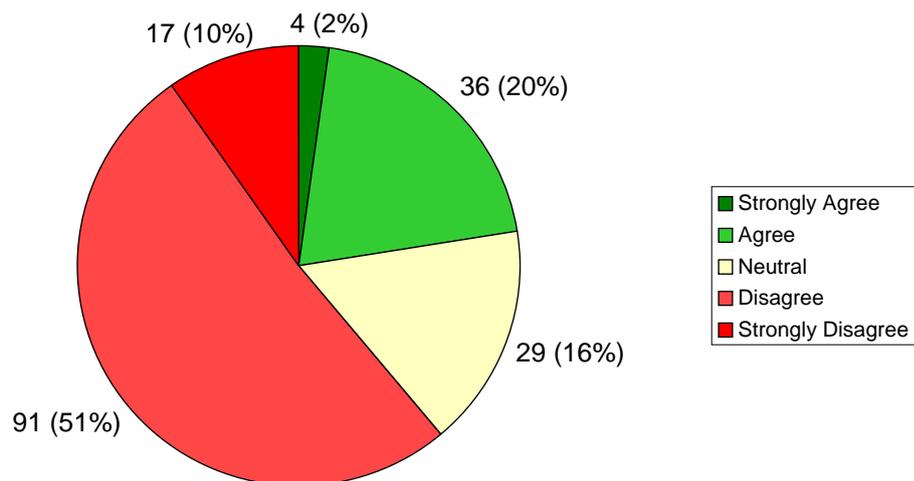
It was commented that joint or co-operative working should be a theme of the Core Strategy, with related objectives, given the regeneration agenda. Others questioned whether there is adequate evidence underpinning the objectives particularly where growth affects adjoining districts. A more detailed summary of the comments made in relation to Question 10 can be viewed in Appendix 1 (page 68).



The majority of respondents considered the Strategic Objectives proposed were not sufficient to regenerate Harlow. Respondents sought more clarity on the areas in need of regenerating (in addition to the Town Centre) and for there to be more focus on the regeneration of hatches; on the delivery and implementation of the Core Strategy, and on the evidence being used to underpin the Strategic Objectives. This level of detail is not appropriate for the Issues and Options stage but will be addressed in subsequent stages.

Questions 11 and 12 set out the Council's initial view on the potential core policy areas that could be developed to help achieve the strategic objectives and form the basis of the more detailed development management policies to guide future development in Harlow.

Question 11 – Do you think the policy areas identified cover the range of issues that are relevant to the regeneration of Harlow?



**Figures may not add up to 100% due to rounding.*

(177 Responses)

The majority of those who responded to this question did not think the core policy areas outlined in the consultation document covered the range of issues that need to be addressed in Harlow. However 22% of the respondents agreed that the core policy areas were appropriate to achieve the strategic objectives. A more detailed statistical analysis of the responses to Question 11 can be viewed in Appendix 1 (page 69).

Question 12 sought to identify any changes to the policy areas or additional policy areas that had been missed.

Question 12 – If you disagree/strongly disagree, what changes would you make to the policy areas?

126 comments were made in relation to the Core Policy Areas. It was commented that the Core Strategy should include policies on dealing with climate change and on the urban fringe. In addition comments were made that the green wedge policy should be strengthened, updated evidence is needed to support retail policies (particularly when defining primary and secondary frontages) and that policies should include minimum requirements / targets in town centre regeneration. It was suggested that the policy on minimum density standards should be omitted and that the policy areas should be better grouped under the appropriate themes, particularly those relating to the development of the town centre.

Others commented that policy areas need to deal with the scope for a Green Belt review, the potential to release Greenfield land for housing, where insufficient previously developed land exists; and direction on how cross boundary growth options could be coordinated. These options need to be tested in the public domain. A more detailed summary of the comments made in relation to Question 12 can be viewed in Appendix 1 (page 70).



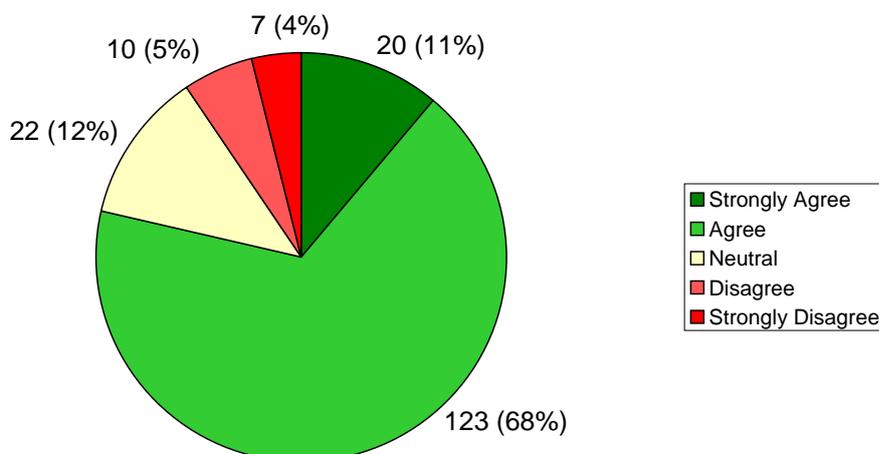
There was general support for the existing policy areas although the majority considered the range of issues that are relevant to regeneration had not been identified. However only policies for dealing with climate change and the urban fringe were identified as missing. Other respondents suggested that the policies supporting Green Wedges should be strengthened and that policy areas should be grouped under appropriate themes.

2.4 Summary of Responses – Chapter 5 – Guiding Future Development

Chapter 5 set out the Council's proposition that investment and growth is necessary to deliver regeneration across the District.

Questions 13 to 16 looked at a range of issues that will help inform the preparation of the Core Strategy, including the principles for directing new development, development densities and the role and function of open spaces, underused land and the Green Wedges. Questions 17 to 20 then focussed on the role, function and future development of the town's employment and retail centres.

Question 13 – Do you agree that new development should be directed to areas that will maximise regeneration of the town?



**Figures may not add up to 100% due to rounding.*

(182 Responses)

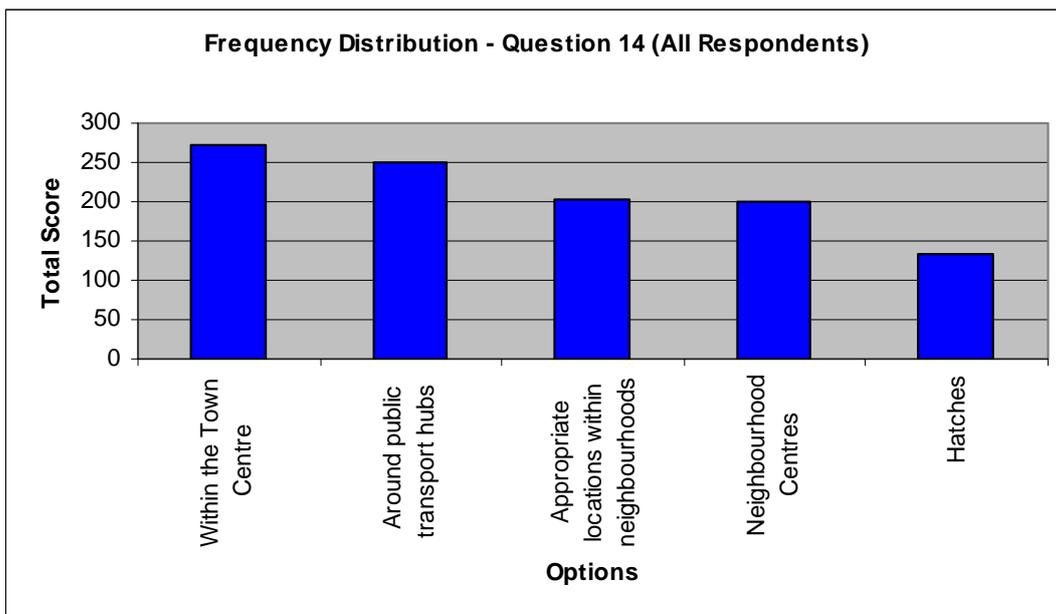
Overall, there was strong support (79% of respondents) for the adoption of regeneration as the guiding principle for directing development across the District. Appendix 1 (page 71) provides a more detailed statistical analysis of the responses to Question 13.



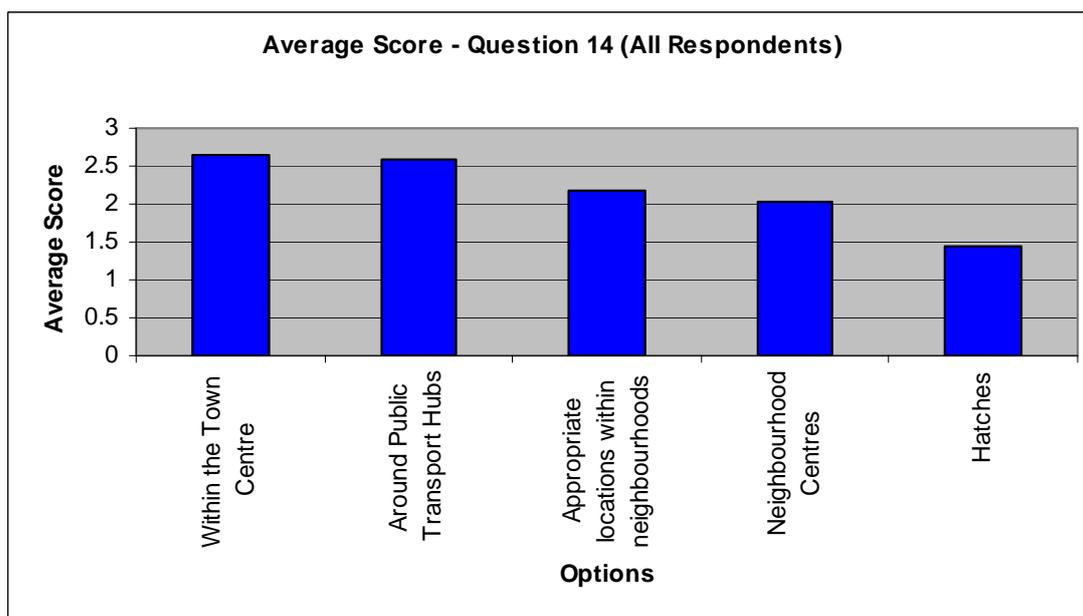
Although there is support for directing new development and housing growth towards areas that will maximise the overall regeneration benefits to the District, it was not considered a high priority when directing growth in and around Harlow in Question 17.

Question 14 – Please rank, in order of priority, where you think higher densities of development should go within the District? (1 = highest priority, 5 = lowest priority).

Respondents were asked to rank five options where high density development should go in the District, from their highest priority to their lowest priority (1 being their highest and 5 being their lowest). Each option received an average of 99 responses (Figure 5). A point scoring system was used to compare the responses to each option. The 'Frequency Distribution' reports the total score for each option. This was calculated by awarding a score of 4 points to each option every time it was ranked as the highest priority down to zero points if it was ranked as the lowest priority. The total points awarded for each option were then added up to calculate the 'total scores' for each option.

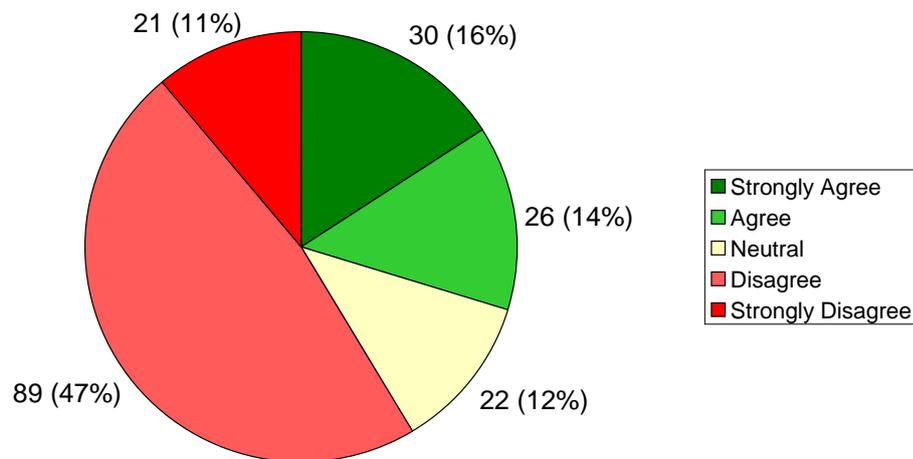


The second chart shows the 'average score' for each option. This was calculated to remove any bias that may have been caused as a result of any single option receiving a disproportionately large number of responses (i.e. some respondents may have only scored one option rather than all five).



Overall, respondents considered the town centre and 'around public transport hubs' to be the most suitable locations for higher density development. After these, neighbourhoods and neighbourhood centres received almost identical scores ahead of hatches which were regarded as the least suitable of the five options provided. A more detailed statistical analysis of the responses to Question 14 can be viewed in Appendix 1 (pages 72 to 76).

Question 15 – Should the Council consider underused open spaces and other undeveloped land for development before considering releasing land in the Green Belt?



**Figures may not add up to 100% due to rounding.*

(188 Responses)

More than half (58%) of respondents did not believe underused open spaces and undeveloped land should be used for future development. This compared to 30% of respondents that viewed these as favourable options ahead of releases of the Green Belt to meet new development within the urban area boundary. A more detailed statistical analysis of the responses to Question 15 can be viewed in Appendix 1 (page 77).



Overall there was a lack of support for the development of green spaces and undeveloped land and these were not favoured to be developed before Green Belt. The Council is reviewing its evidence base to consider how to balance future development needs and the protection of the spaces valued by the community.

Question 16 – The Green Wedges have performed a variety of roles in shaping Harlow. Should the roles of Green Wedges be reviewed to meet future development needs in the Harlow area?

Question 16 was an open-ended question which received 169 responses. 40 respondents opposed the principle of reviewing the roles of Green Wedges and 70 stated that they should not be developed on at all. Three responded that they should only be developed as a last resort and two said it would set a dangerous precedent resulting in the loss of all Green Wedges. One proposed that it would be better to build on the Green Belt than destroy Green Wedges, whereas four stated the opposite. Comments were made that they perform important recreational, health/quality of life and movement functions (18) as well as an important flood protection role (16). Others argued access to Green Wedges needs improving (18).

In contrast, 11 respondents wanted a review of the roles of Green Wedges generally, and 12 agreed they should be reviewed but only to be strengthened, improved or enhanced. A further two favoured a review but only to widen roads to ease traffic congestion.

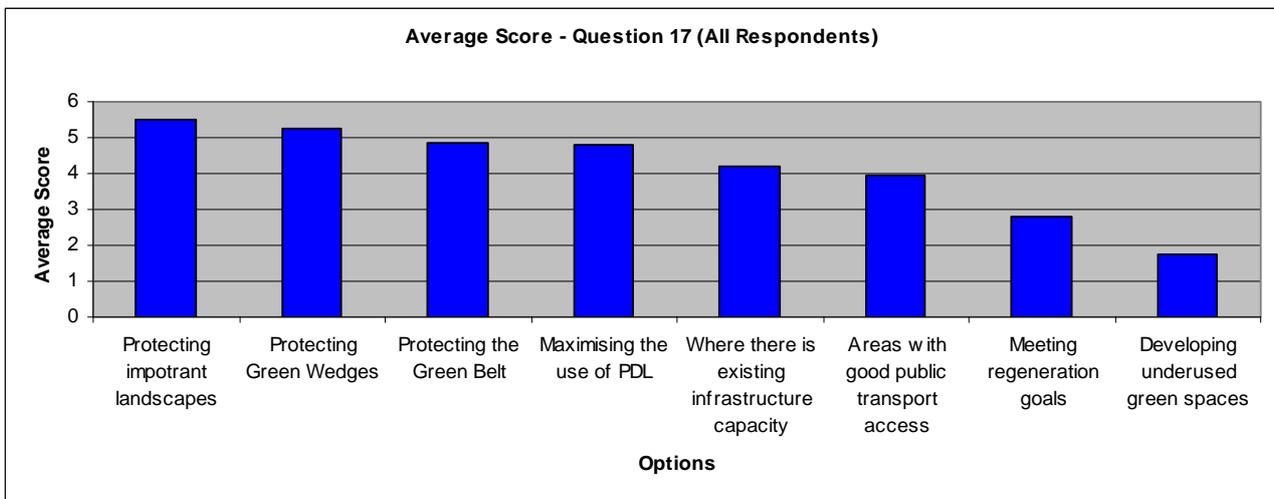
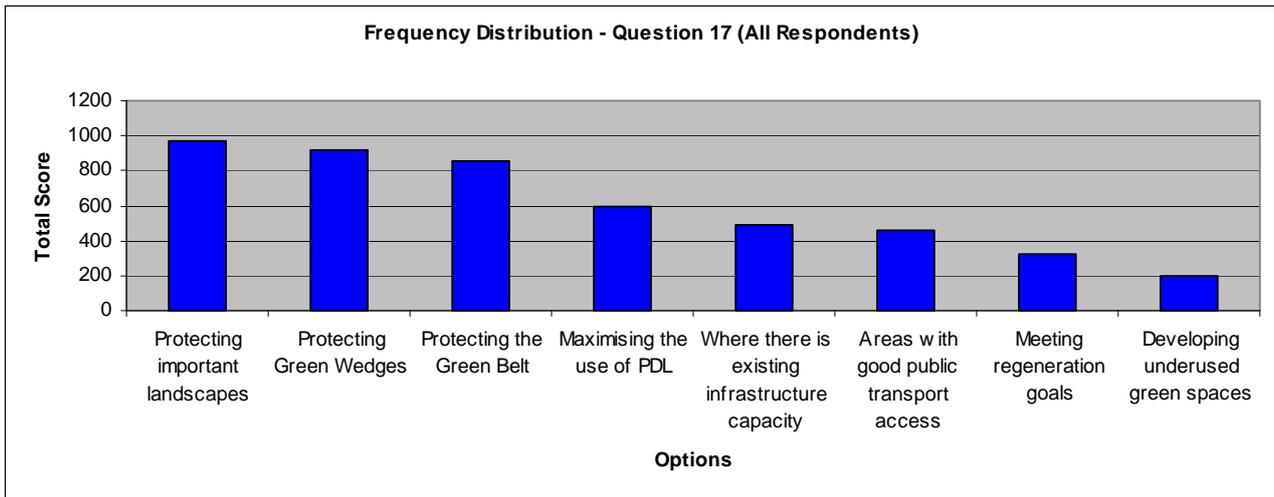
A number of respondents gave more qualified support for a review of Green Wedges. Four considered they should be reviewed where new Green Wedges are required to serve new urban extensions, and three supported a review in order to build things that would benefit neighbourhoods such as schools, leisure facilities and retail facilities. Two concluded only poor quality open spaces should be reviewed, and one said development should be allowed on Green Wedges to enable regeneration, providing there were swaps to enable new Green Wedges to be provided elsewhere. A more detailed summary of the comments made in relation to Question 16 can be viewed in Appendix 1 (page 78).



National Planning Policy requires local authorities to undertake assessments of the open spaces within their districts to ensure that the open spaces, including green Wedges, continue to provide a valuable function to meet the needs of residents and visitors. The Council is undertaking an Open Space Assessment which will analyse of the wider green infrastructure network and open space priorities for Harlow.

Question 17 – Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow. (1 = highest priority, 8 = lowest priority).

Respondents were asked to rank eight options for directing new development in and around Harlow from their highest priority to their lowest priority, 1 being their highest and 8 being their lowest. Each option received between 119 and 182 responses. As for Question 14, a points scoring system was used to compare the responses to each option (page 27). The 'Frequency Distribution' chart reports the total score for each option. The second chart shows the 'average score' for each option.

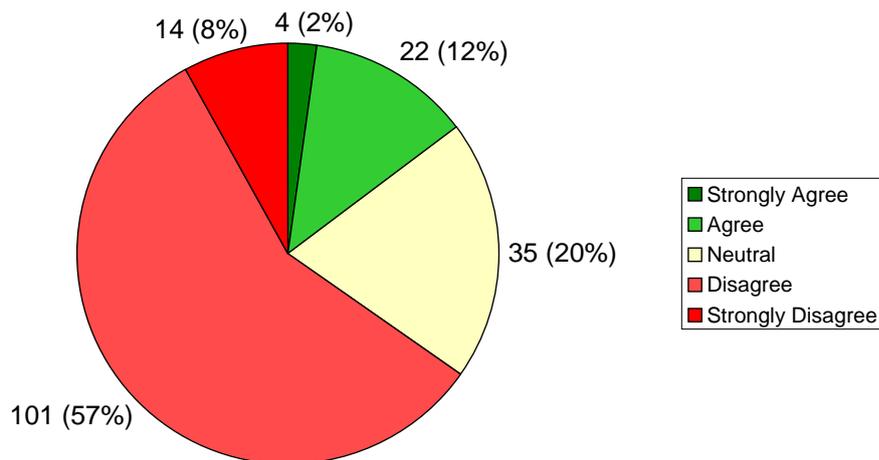


Both charts reveal that respondents value Harlow’s natural landscapes, Green Belt land and Green Wedges and want to protect these from development. ‘Previously Developed Land’ (PDL) and areas with existing infrastructure and good public transport links were ranked by respondents as their third, fourth and fifth priorities respectively in terms of factors that should direct new development. Meeting regeneration goals and development of underused green spaces received the lowest total and average scores overall. A more detailed statistical analysis of the responses to Question 17 can be viewed in Appendix 1 (page 79 to 83).



Respondents’ priority was to firstly protect Harlow’s natural landscapes, then the Green Wedges and then the Green Belt. Preference was given to maximising the use of Previously Developed Land and locating development where there was infrastructure capacity and good public transport before directing development to meet regeneration goal. However respondents to Question 13 supported the principles of directing development to areas that will bring regeneration benefits to the town as a whole.

Question 18 – Do the existing employment areas meet current and future employment needs?



**Figures may not add up to 100% due to rounding.*

(176 Responses)

Respondents have given a strong indication that Harlow’s existing employment areas are not responsive to current employment and business needs. 65% of respondents disagreed that the town’s current employment areas are appropriate for satisfying current and future employment and business needs against just 14% who felt their current roles, functions and locations were satisfactory. A more detailed statistical analysis of the responses to Question 18 can be viewed in Appendix 1 (page 84).

Question 19 was included to gather comments on the changes that should be made to Harlow’s employment areas.

Question 19 – If you disagree/strongly disagree, please explain what changes you think should be made to Harlow’s employment areas?

135 responses were received to this question. There was considerable variation in the comments. Some argued that no changes should be made to Harlow’s employment areas, others argued they need reviewing / regenerating / redeveloping and more investment to ensure they are fit for modern requirements.

Requests were made to improve the connectivity of existing employment areas, particularly to the Town Centre and areas to the north and west, and to improve public transport links to Templefields/Edinburgh Way and The Pinnacles. Improvements to the public realm in The Pinnacles to attract inward investors were proposed.

It was noted there is vacant employment land in Harlow and a suggestion was made to consolidate employment land within Templefields/Edinburgh Way and The Pinnacles so remaining land can be used for other purposes to help meet the Council’s broader regeneration goals.

Suggestions were made for new employment areas to be created in the north east and east. There was particular support for new employment areas to be designated in the south east and south which would have good access to the M11 motorway junction (J7) , avoiding the need for employment-related traffic to pass through the town. There were also supporters and objectors to the concept of extending The Pinnacles.

It was suggested that any large urban extension should include a new high technology business site to attract growth sector 'knowledge industry' jobs. A suggestion was also made to designate the industrial area at Staple Tye as a regeneration area for a new mixed-use development and to relocate existing industrial units there to The Pinnacles and Templefields/Edinburgh Way.

There were supporters and objectors to the idea of using of employment sites for housing whilst one respondent suggested employment and housing areas should be integrated to reduce car use and integrate communities.

Other suggestions included encouraging more manufacturing firms and professionals to locate in Harlow, to create more small home-based work units and the need to include employment land provision within any urban extensions. There were also respondents who argued that employment areas should be used to provide jobs for Harlow people. A more detailed summary of the comments made in relation to Question 19 can be viewed in Appendix 1 (pages 85 to 87).



The quality of the town's employment areas are considered to be unsatisfactory, with Templefields and The Pinnacles having poor connectivity and public realm. In light of the changes being made to the planning system, the Council is undertaking an Employment Land Review to assess the performance of the current employment areas, and will be looking to take options forward for improving these areas in the Core Strategy.

Question 20 – How do you think Harlow Council should shape future shopping development within the town?

Question 20 was an open-ended question which received 170 responses. There was strong support for new retail development being located in the Town Centre, and that there should be no more retail development located in Edinburgh way.

People considered that the existing shopping hierarchy should be maintained and existing centres should be audited for their role, vitality, viability and the ability to incorporate new development.

Overall it was proposed that there should be a more considered approach to Town Centre Strategy and the role that the Centre plays in the town, particularly when viewed in the light of potential growth. There was concern about the potential impact of new shopping centres outside of Harlow, particularly Westfield at Stratford. A more detailed summary of the comments made in relation to Question 20 can be viewed in Appendix 1 (pages 88 to 90).



There was support from respondents for maintaining the existing shopping hierarchy in Harlow, with the Town Centre retained as the main focus for retail development and restricting any further expansion of the retail offer at Edinburgh Way. The Council is continuing to examine the role and function of the retail centres across the District (including the Town Centre, Edinburgh Way, Neighbourhood Centres and Hatches) to ensure they meet the current and future retail needs of the local community.

2.5 Summary of Responses – Chapter 6 – Spatial Options for Growth

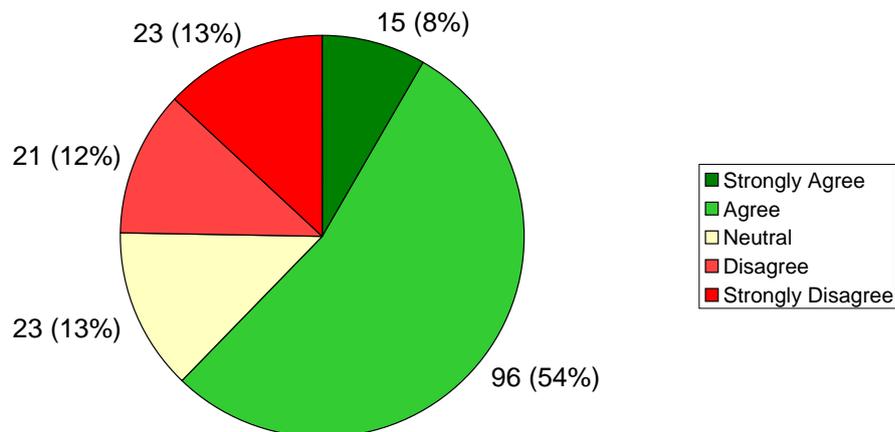
Chapter 6 focussed on the issue of growth around Harlow. Policy HA1 of the East of England Plan designated Harlow as a major regional housing growth point, with 16,000 new houses to be delivered within the 'Harlow area' by 2021. The Plan specifically added that this new housing should be provided in the existing area of the town through selective renewal and redevelopment, including mixed use development in the town centre, and through urban extensions in the adjoining districts to the north, east, and on a smaller scale the south and west. As required by the East of England Plan, and on behalf of Harlow, Epping Forest and East Hertfordshire District Councils, a consultant was appointed to appraise the possible growth options in order to inform the preparation of the Core Strategy. Although the East of England Plan is being withdrawn, the consultant's assessment of five potential growth options around Harlow based on the East of England Plan were set out in the consultation document as a starting point for exploring potential options to meet Harlow's current and future regeneration and housing needs. This, it is stressed, did not represent the Council's preferred approach.

Questions 21 to 26 asked respondents for their views on the consultants' assessments in relation to the five potential growth options (Options A to E), as well as on the consultants' suggested spatial approach to accommodating growth around Harlow. The questions were specifically worded in this way in order to try to avoid the consultation becoming a choice between each growth option. It should be noted however that many of the responses in relation to these questions may have reflected the respondents' views on each option, or on the merit of the distribution of the growth within an option, rather than their views on the consultants' 'findings' regarding each option which was the question being asked. The responses received in relation to each option should therefore be interpreted with care. Question 27 asked respondents for their general comments on the approach to growth around Harlow.

Question 21 – What is your view on the consultants' recommendations regarding option A?

Option A was based on requirements set out in Policy HA1 of the East of England Plan and placed the bulk of growth to the north of Harlow, together with some growth to the east and smaller elements to the south and west. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 125). The consultants rejected this as a reasonable option primarily because there would be insufficient time available for the key transport infrastructure required for this spatial option

to be delivered. A more detailed summary of the consultants' findings in respect of this option are available in section 6.7.3 of the Issues and Options consultation document.



**Figures may not add up to 100% due to rounding.*

(178 Responses)

62% of respondents agreed with the consultants' findings regarding Option A, whilst 25% disagreed with their recommendations in relation to this option. A more detailed statistical analysis of the responses to Question 21 can be viewed in Appendix 1 (page 91).

42 respondents stated that development to the north will split the town and is unlikely to feel like part of Harlow. Concerns were expressed regarding connectivity problems across the Stort with a number of respondents stating that connections between Harlow and Harlow north would very difficult to achieve financially and environmentally.

Concerns were raised about the impact this option would have on the historic villages of Hunsdon and Eastwick. Concerns were also raised about the long-term integrity of the Green Belt, given the lack of natural or man made barriers to prevent further urban sprawl. Many respondents from East Hertfordshire expressed the view that land within Harlow should be used before land outside Harlow in East Hertfordshire.

However, some respondents viewed this option positively because of its potential to allow new infrastructure to be provided all in one place, rather than spreading the burden around existing areas of Harlow. Some Harlow residents also favoured development to the North of Harlow in order to safeguard Harlow's Green Wedges.

The view was expressed that this option is predicated on the East England Plan, which is no longer relevant because of the Localism Bill and the impending abolition of the Regional Strategies. Other respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid. Option A was also seen as a very high risk strategy by some respondents since it places the majority of Harlow's future development in a single site which is outside the control of Harlow Council.

Respondents suggested that Harlow's evidence base shows that large-scale urban extensions to the east would have the least environmental impact. Respondents also cited The East of England Plan Panel Report conclusion that the east of Harlow is the least

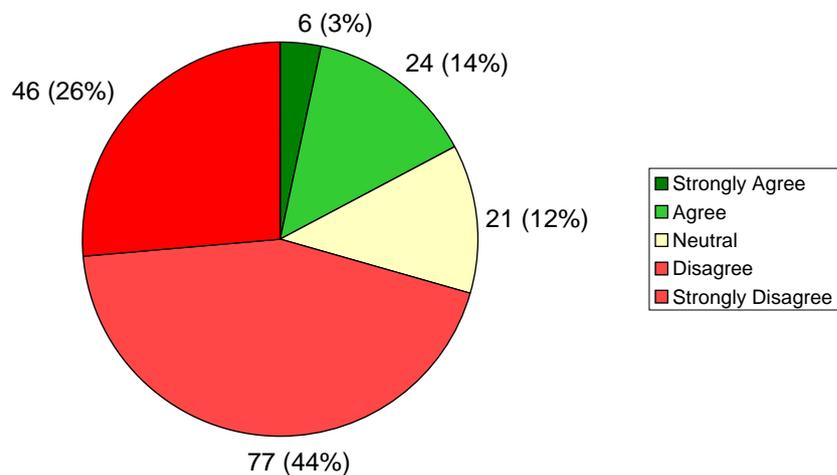
constrained option for growth. For these reasons, the low level of development put forward in this Option in East Harlow was questioned.

Water Cycle Strategies, Flood Risk Assessments and the Sequential Test were seen as important in shaping the future location and scale of growth in Harlow. From an educational perspective it was questioned whether such a large allocation to the north would utilise existing educational capacity in Harlow.

It was questioned whether this option would facilitate the regeneration of Harlow. The methodology utilised by consultants to consider whether development in any location would support regeneration was questioned. A more detailed summary of the additional comments received in relation to Option A can be viewed in Appendix 1 (pages 92 to 93).

Question 22 – What is your view on the consultants’ recommendations regarding option B?

Option B reflected the broad directional and distributional elements of the growth requirements set out in Policy HA1 of the East of England Plan but did not focus the bulk of the new housing provision to the north of Harlow. Instead it examined the opportunities and constraints associated with a number of potential alternative locations around Harlow but which still reflected the general overall approach set out in the guidance of Policy HA1. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 125). The consultants suggested that this would be a reasonable option with more housing growth for the area west of Harlow and greater growth explored to the east and south than option A, and that a proportionate distribution between locations north and south may help to provide critical mass to assist regeneration. A more detailed summary of the consultants’ findings in respect of this option are available in section 6.7.6 of the Issues and Options consultation document.



**Figures may not add up to 100% due to rounding.*

(174 Responses)

Overall, the majority of respondents (70%) disagreed with the consultants’ findings regarding Option B, whilst 17% agreed with their recommendations in relation to this option. A more detailed statistical analysis of the responses to Question 22 can be viewed in Appendix 1 (page 94).

Methodological concerns are raised about Scott Wilson's report and the way in which all spatial options were derived. Concerns were raised that the policy-led approach followed in Option B is based on Policy HA1 of the East England Plan, which is in the process of being withdrawn through the Localism Bill. It was therefore questioned whether such a top-down policy approach was appropriate to shape future development of Harlow, given the bottom-up Localism agenda being pursued by the current Government.

Concerns were expressed about coalescence with Roydon, given the 2,800 dwellings earmarked for development to the west in Option B. Concerns were also raised about coalescence with Sawbridgeworth to the north east. Concerns were raised regarding the level of growth in the south, with a number of respondents expressing the view that any development should not breach the sky line of Rye Hill ridge.

A number of respondents felt that development to the north of Harlow is inappropriate due to the environmental impact on sensitive landscape areas. A number of respondents also felt that directing only 3,300 dwellings to the east of Harlow fails to make use of the least environmentally sensitive land.

A number of questions were raised regarding the spatial distribution of growth and its ability to deliver infrastructure and the regeneration of Harlow. By distributing growth across Harlow more evenly, a number of respondents questioned whether Option B would deliver infrastructure in a comprehensive way. A number of respondents suggested that large scale growth to the north of Harlow could deliver infrastructure required in one location in a more deliverable way. For these reasons some respondents felt that directing only 3,300 new dwellings to the north would be a wasted opportunity.

Some respondents also questioned whether spreading development to a number of different locations would have the same transformational and catalytic effect as large scale development to the north of Harlow. However, many local residents also felt that growth to the north of the Stort would fail to integrate with Harlow and take the form of an independent and competing settlement.

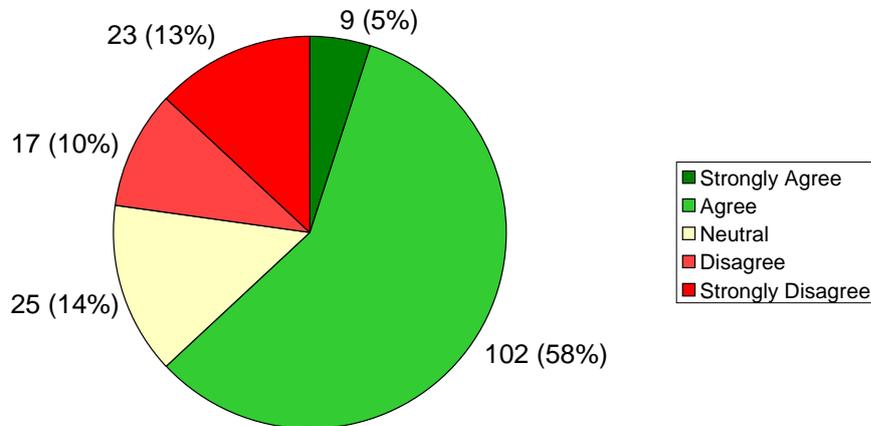
A number of respondents stated that it was unclear how this spread of developments would assist in regenerating deprived neighbourhoods in Harlow. A number of respondents felt that development in the south should be in conjunction with the redevelopment of existing deprived areas.

It was pointed out that Water Cycle Strategies and Strategic Flood Risk Assessments should inform the scale and location of development. Concerns were raised about the sewerage infrastructure required to serve new development and the need for upgrades to the Rye Meads Sewerage Treatment Works. A more detailed summary of the additional comments received in relation to Option B can be viewed in Appendix 1 (pages 95 to 97).

Question 23 – What is your view on the consultants' recommendations regarding option C?

Option C focussed on locations to the east of the town as the main area of search with less development to the south and west. This approach was based on an assessment of a range of specific environmental criteria including the Green Belt, landscape sensitivity, flood zones, regeneration, objectives and transport accessibility but disregarded the specific strategic directions for growth set out in the East of England Plan. An illustration of the distributions of development based on this approach can be viewed in Appendix 1

(page 126). The consultants suggested this would not be a reasonable option, primarily because it did not conform to Policy HA1 of the East of England Plan, particularly its requirement for an extension to the north of Harlow. A more detailed summary of the consultants' findings in respect of this option are available in section 6.7.10 of the Issues and Options consultation document.



**Figures may not add up to 100% due to rounding.*

(176 Responses)

63% of respondents agreed with the consultants' findings regarding Option C, whilst 23% disagreed with their recommendations in relation to this option. A more detailed statistical analysis of the responses to Question 23 can be viewed in Appendix 1 (page 98).

In light of the pending revocation of The East of England Plan (EEP) many respondents questioned whether Option C should have been rejected by consultants because it did not contain development to the north of Harlow and was therefore not compliant with the Policy HA1 of the EEP. A number of respondents cited Scott Wilson's analysis which showed that Option C is a sustainable option and stressed that whether this option complies with the RSS is no longer relevant. Other respondents argued that The East of England Plan remains part of the Development Plan for Harlow, so the consultant's conclusions about this option are valid. Methodological concerns were raised about Scott Wilson's report and the way each spatial option was derived from the assessment of Spatial Land Areas. These irregularities drew some to conclude that the findings of this study are invalid.

Concern were expressed by respondents about the impact this Spatial Option would have on traffic congestion with a number of respondents questioning the capacity of the road system to cope with growth to the east and south of Harlow. However, many other respondents questioned whether certain spatial options can be discounted because of traffic concerns with many pointing out that all options proposed would increase congestion.

Concerns were raised about development to the south and its potential impact on Rye Hill ridge. Some respondents stressed that growth to the east is preferable in terms of Green Belt as the M11 provides a definitive boundary to further expansion. Some respondents also favoured growth to the east, when compared to growth to the north, on landscape sensitivity grounds.

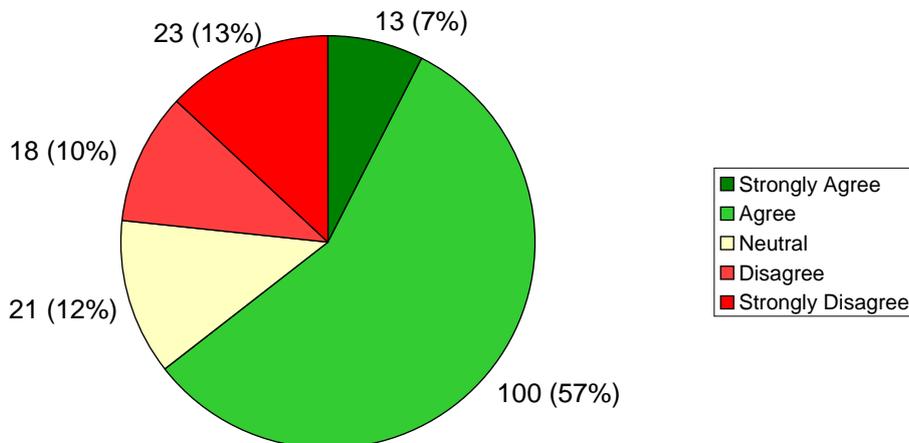
It was pointed out that Water Cycle Strategies and Strategic Flood Risk Assessments should inform the scale and location of development. Concerns were raised about the sewerage infrastructure required to serve new development and the need for upgrades to the Rye Meads Sewerage Treatment Works.

Concerns were raised about the impact of this option on educational infrastructure, particularly the impact on Passmores and Stewards Schools. A more detailed summary of the additional comments received in relation to Option C can be viewed in Appendix 1 (pages 99 to 100).

Question 24 – What is your view on the consultants’ recommendations regarding option D?

Option D examined a distribution of housing based upon securing the greatest potential regeneration benefits for locations within Harlow. This option again focussed on growth to the north of Harlow but with smaller but similar distributions to the east and south with a small amount to the west. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 126).

The consultants felt this was not a reasonable option due to transport and sewerage constraints associated with high levels of development to the north which, they concluded, meant there was an unacceptable risk that the option might not be fully implemented. A more detailed summary of the consultants’ findings in respect of this option are available in sections 6.7.14 to 6.7.16 of the Issues and Options consultation document.



**Figures may not add up to 100% due to rounding.*

(175 Responses)

64% of respondents agreed with the consultants’ findings regarding Option D against 23% who disagreed with their recommendations on this option. A more detailed statistical analysis of the responses to Question 24 can be viewed in Appendix 1 (page 101).

Development to the north was viewed by a number of respondents as being problematic because of inadequate transport connections and sewerage constraints. However, other respondents felt that transport and sewerage constraints to the north are over-exaggerated by the consultants.

Concerns were raised about the impact of development to the north with respect to environmental impact, landscape sensitivity, flooding, southern ridge line and the impact

on the historic villages of Hunsdon and Eastwick. Concerns were also raised about the long-term integrity of the Green Belt, given the lack of natural or man made barriers to prevent further urban sprawl to the north. The emphasis for a number of respondents was that the Green Belt should be protected. A number of respondents stressing that opportunities to bring forward vacant Brownfield sites should be explored before development takes place on the Green Belt.

Some respondents raised concerns that this spatial option places a lot of reliance on building in East Hertfordshire. This was highlighted by some as being a significant risk. Other respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid.

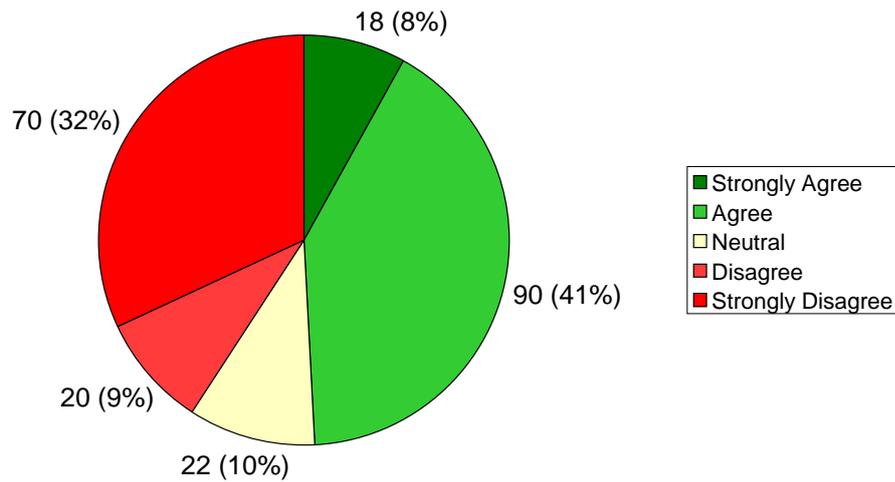
Respondents questioned Scott Wilson's approach to assessing the impact on the regeneration of Harlow. Methodological concerns were raised about the way in which consultants scored different land areas, which was not seen to mirror the reality on the ground in Harlow. Respondents also drew attention to a section of the Scott Wilson report which warns that major growth to the north could negatively impact efforts to regenerate the town by creating a separate new extension that would divert investment away from Harlow. These respondents were concerned that this point seems to have been overlooked when formulating Option D. To regenerate Harlow, a number of respondents expressed the view that there needs to be close proximity between new development and the existing neighbourhoods. Some respondents felt that development to the north of the Stort is likely to link with Hertford and Bishop Stortford, rather than Harlow.

Concerns were expressed by respondents about the impact this Spatial Option would have on traffic congestion with a number of respondents questioning the capacity of the road system to cope with growth to the south of Harlow. However, other respondents questioned whether certain options can be discounted because of traffic concerns, pointing out that all options proposed would increase congestion.

Some respondents felt that Option D fails to utilise the environmentally least sensitive land, which was seen to be to the east. A more detailed summary of the additional comments received in relation to Option D can be viewed in Appendix 1 (pages 102 to 103).

Question 25 – What is your view on the consultants' recommendations regarding option E?

Option E was based upon the identification of potential broad locations for new housing and distributions based upon areas that can benefit from sustainable transport provision. This option focussed growth to the east of Harlow with smaller distributions to the west and north. It showed distributions that would have sufficient critical mass to support regeneration and the provision of key infrastructure close to existing rail stations together with enhancement of cycle ways and footpath links. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 127). The consultants did not feel this was a reasonable option primarily in light of transport and sewerage constraints associated with high levels of development allocated to urban extensions to the north. A more detailed summary of the consultants' findings in respect of this option is available in section 6.7.19 of the Issues and Options consultation document.



**Figures may not add up to 100% due to rounding.*

(220 Responses)

49% of respondents agreed with the consultants' findings regarding Option E, whereas 41% disagreed with the consultants' recommendations on this option. A more detailed statistical analysis of the responses to Question 25 can be viewed in Appendix 1 (page 104).

Option E was supported by a number of respondents because it was seen to be the most likely to increase use of sustainable transport, walking and cycling and reduce congestion. It was pointed out that this option would be reasonable were it not in conflict with the East England Plan, which is in the process of being revoked.

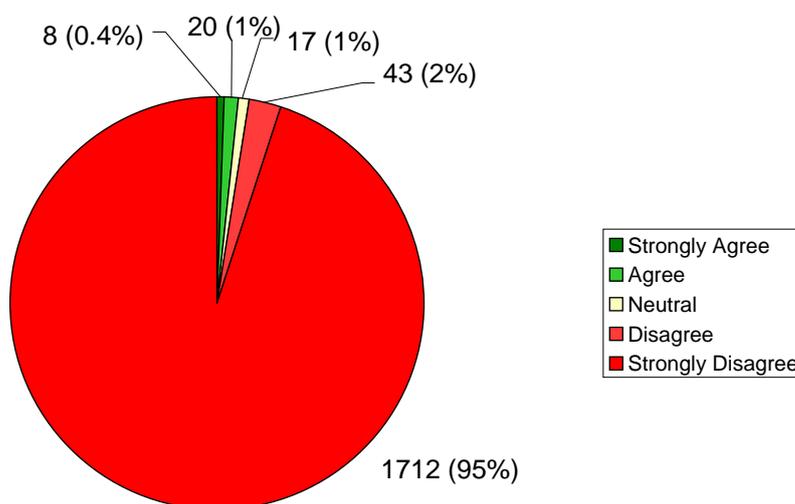
However, concerns were expressed about coalescence with Roydon, Sawbridgeworth and Sheering. Respondents felt that development on land north of Gilden Way would be inappropriate due to the potential impact on sensitive landscapes and archaeological areas, traffic congestion and flooding. However, other respondents suggested that growth to the east could facilitate a future new M11 junction and sustainable transport measures. Other respondents suggested that there needs a new link to the M11 and sustainable transport before development takes place.

A number of respondents supported this spatial option because it did not involve growth to the south and would therefore safeguard the southern ridge line. Respondents suggested that development on Green Belt to the east is preferable as it would be contained by the M11. Respondents suggested that development to the east would integrate better with Harlow and the existing road network and railway stations. Respondents stated that the scale of development to the south and west needs to be sufficient to support the regeneration of deprived areas of Harlow.

Respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid. Respondents also questioned the conclusions of consultants about sewerage constraints. These respondents stressed that all sewerage upgrades and upgrades to Rye Meads will be required irrespective of the location of growth and it is therefore misleading to reject growth in particular locations due to sewerage constraints. A more detailed summary of the additional comments received in relation to Option E can be viewed in Appendix 1 (pages 105 to 106).

Question 26 – What is your view on the consultants’ suggested approach to accommodating growth around Harlow?

This question asked people to state if they agreed or disagreed with the consultants’ suggested approach to accommodate housing growth around the town. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 127). This was one of the two questions that the STOP Harlow North Campaign group responded to (the other being Question 27) and therefore received 1,800 responses - 81% (1,462) of which were submitted by the STOP Harlow North campaign group.



**Figures may not add up to 100% due to rounding.*

(1,800 Responses)

97% of respondents disagreed with the consultants’ suggested approach whilst just 1.4% agreed with this as the most appropriate option. A more detailed statistical analysis of the responses to Question 26 can be viewed in Appendix 1 (page 107).

Each direction of growth (north, south, south west and east) had both its supporters and objectors. Overall on balance people were concerned and wary about the consultant’s approach to growth at all points of the compass for a variety of reasons. These included potential flooding; breaching the surrounding ridgeline; not needed; unsustainable; use of farmland; split the town north/south.

In particular there was concern that the approach was “out of date” now that the East of England Plan was likely to be revoked. Indeed it was felt that following the abolition of the East of England Plan, the favoured option was ‘C’, the constraints led approach.

As expressed elsewhere there were concerns over the ability of the town’s infrastructure to cope with the level of growth proposed. Some people expressed objections to expansion into the Green Belt. A more detailed summary of the comments received in relation to the consultants’ suggested approach can be viewed in Appendix 1 (pages 108 to 111).



Observations to the Responses A - E

Options A to E were developed by consultants to help test and assess the level and location of housing growth as set out in Policy HA1 of the East Of England Plan for the Harlow Area.

The consultants identified different policy approaches that could be used to derive a range of different spatial options. These were as follows:

- *Option A* - An approach based on the directional and distributional elements of Policy HA1.
- *Option B* - An approach based on the directional and distributional elements of Policy HA1 but without a concentration in the north.
- *Option C* - An approach that sieves out constraints such as unsuitable land.
- *Option D* - An approach that examines regeneration benefits.
- *Option E* - An approach based on the benefits of existing or enhanced transport provision.
- *The Consultants' Suggested Approach* - An approach suggested by the consultants based on an assessment of all the other options.

This enabled an assessment of how realistic and sustainable each of the resulting spatial options were for consideration during the preparation of the spatial strategy. The Council considered it was appropriate to consult on this work to find out if a particular approach was preferred.

The responses were generally in support of the consultants' conclusions that the resulting spatial options A,C,D and E, generated from the different approaches, were not reasonable. For Option B respondents did not agree with the consultants' conclusion that this was a reasonable spatial option, providing development was lower to the west and higher to the east and south of Harlow. Option E, was based on enhancing transport but the consultants considered this was not a reasonable spatial option; there were nearly the same number responses which disagreed as agreed with this option. Most respondents disagreed with the consultants' suggested spatial approach.

In retrospect the questions and text were worded in a way that was unclear whether the respondents' were taking into consideration each option as shown on the diagrams, or the approach, or the consultants' assessment of the resulting spatial options arising from that approach.

Question 27 – do you have any other comments on the approach to growth around Harlow?

This question was designed to gather any additional comments that people may have wanted to express regarding the approach to growth around Harlow. This was the second of the two questions that the STOP Harlow North Campaign group responded to and consequently received 1,795 comments and (as with Question 26), 81% of these were submitted by the Stop Harlow North Campaign group.

A significant number of respondents identified that infrastructure, and in particular transportation, was a major issue affecting the town and that these would need to be resolved before growth is provided.

A large number of respondents supported limited housing to meet local needs and strongly objected to major development north of Harlow.

Some respondents were concerned that the growth to the north of Harlow would undermine the regeneration of the town and identified some of the arguments put forward during the preparation of the East of England Plan. It was felt that development should integrate with Harlow and not compete against it.

Some felt that better use of unused land within Harlow could be made for future development, and would better support regeneration of the town. One respondent suggested that the Core Strategy look to smaller scale, organic additions to Harlow's existing neighbourhoods that can be implemented with infrastructure improvements rather than major new provision.

It was suggested that the case for growth to the north of Harlow has yet to be made whereas another respondent referred to the block of evidence highlighting that a step change in housing provision is required to meet the backlog of unmet housing need, particularly in the East of England. A more detailed summary of the comments made in relation to Question 27 can be viewed in Appendix 1 (pages 112 to 113).

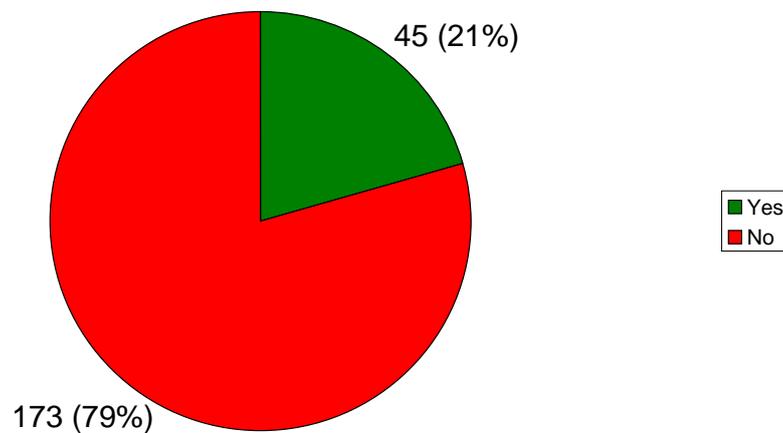


A range of comments were made which will be considered against the background of the changes being made by the Government to the planning system. There was opposition to development north of Harlow but the responses that were received in relation to this question were mostly from residents outside the District.

2.6 Summary of Responses – Chapter 7 – Developing a Delivery Strategy

The final chapter dealt with the key infrastructure that will need to be delivered to underpin the emerging Core Strategy. Questions 28 and 29 were designed to get feedback on whether or not all of the key infrastructure that will be necessary to support the Core Strategy had been identified in the consultation document, whilst Question 30 sought views on the measures that should be adopted to tackle congestion in Harlow. The final Question (31) was designed to collect any other comments that people wanted to make on the development of Harlow's Core Strategy.

Question 28 – Do you think all the key elements of infrastructure necessary to support the emerging Core Strategy have been identified?



**Figures may not add up to 100% due to rounding.*

(218 Responses)

The majority (79%) of respondents did not believe all of the key infrastructure needed to support the Core Strategy had been identified. A more detailed statistical analysis of the responses to Question 28 can be viewed in Appendix 1 (page 114).

Question 29 was designed to gather respondents' views on the additional infrastructure that should be considered as the Core Strategy develops.

Question 29 – If no, what additional infrastructure do you think is needed to support the emerging Core Strategy?

117 comments were received in relation to Question 29. Concerns were expressed that key elements of infrastructure are technically undeliverable. A number of respondents felt that, unless firm commitments are made to invest in Harlow's road, water and sewerage infrastructure, further development of Harlow cannot be justified and should not commence. Some respondents suggested that, given infrastructure costs and difficulties, it is more realistic to scale back level of development to that which can be accommodated within existing infrastructure. The phasing of development was highlighted as a key concern.

Respondents stated that there is a need to demonstrate how this infrastructure will be funded, given that the funding situation has changed dramatically since evidence base studies were published. It was stressed that there will be considerable competition for funds and it is important that sustainable transport is not squeezed out. Development may be discouraged as a result of unviable developer contributions towards infrastructure as the market is fragile. Infrastructure needs of adjoining authorities should also be considered in context of urban extensions and the knock on impacts on infrastructure outside of Harlow should be recognised (e.g. East Herts. and Epping).

Some respondents suggested that Harlow's evidence base (Harlow Infrastructure Study) is based on desk top review at a very superficial level and that schemes put forward in this

study are not supported or justified by any strategic transport modelling work. There were also concerns that all spatial options have not been treated consistently with regard to infrastructure.

Many respondents felt that better access to the M11 was critical to aid both residential and employment growth. However, other stakeholders suggested that the delivery of growth should not become entirely contingent upon the provision of a motorway junction as much can be delivered in advance of that. Respondents felt that gaps in Harlow's cycle network need to be highlighted and plugged and that better bus links are required from Harlow to outlying towns and to serve certain areas of Harlow with poor access. Respondents felt that improvements are required in Harlow Bus Station and railway stations, with access to Harlow Mill being a key concern. Some respondents felt that Harlow should consider extending the central line from Epping.

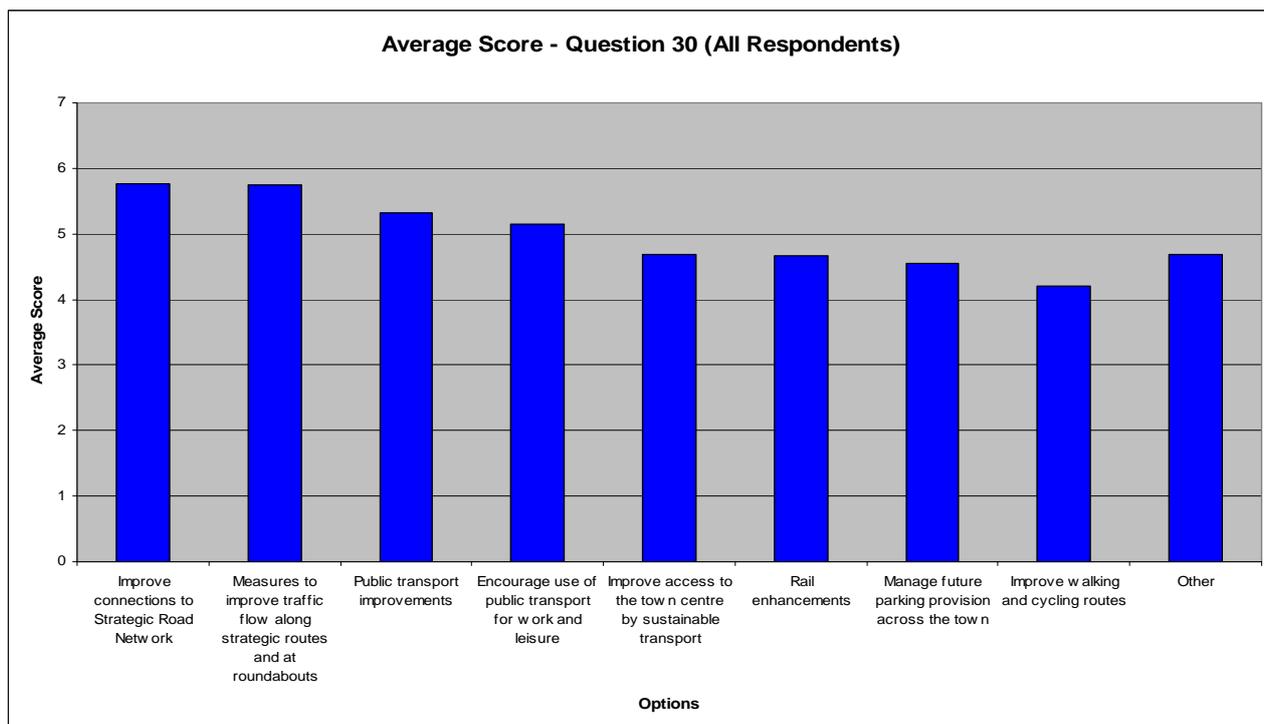
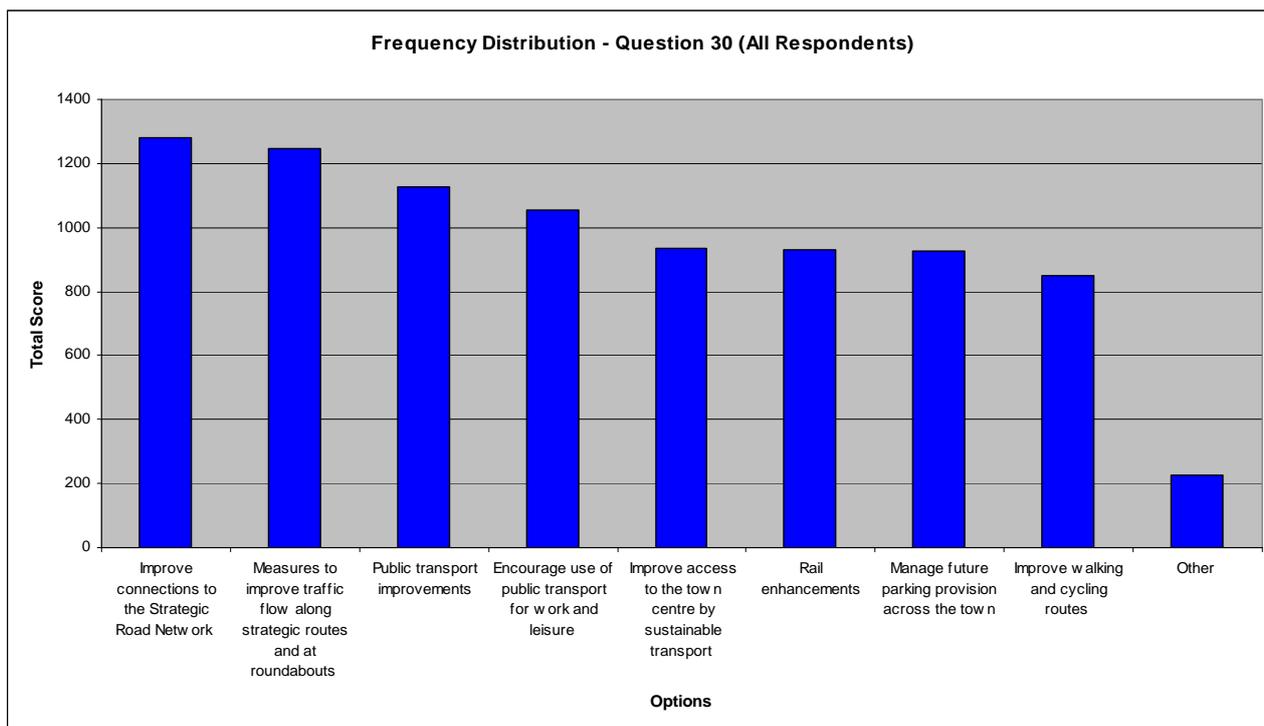
A number of respondents urged the Council to be realistic about car use, stressing the limitations and cost of public transport and people's inclination to drive. Other respondents stressed the effectiveness of Travel Planning. Respondents were concerned that sewerage and drainage infrastructure is overloaded and water supply and sewerage infrastructure should be in place before development commences. Sustainable Drainage Systems should be incorporated into new development. It was highlighted that the Rye Meads Water Cycle Strategy was not a detailed study and only provides suggested solutions and that further work will be required in this area. A more detailed summary of the comments made in relation to Question 29 can be viewed in Appendix 1 (pages 115 to 117).



The majority of respondents did not think all the infrastructure necessary to support the Core Strategy had been identified in the consultation document. However the majority of the additional infrastructure issues raised such as the provision of funding and deliverability of infrastructure were already covered in the consultation document. Nevertheless, funding and deliverability issues are important and work is underway accessing the infrastructure requirements for future developments and Harlow's overall infrastructure needs will inform the level and location of growth in the Core Strategy.

Question 30 – Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority).

Respondents were asked to rank nine measures that could be adopted by the Council to tackle congestion in Harlow from their highest priority to their lowest priority, 1 being their highest and nine being their lowest. Each option received between 224 and 48 responses. As for Questions 14 and 17 a points scoring system was used to compare the responses to each option. The 'Frequency Distribution' chart reports the total score for each option. The second chart shows the 'average score' for each option.



Improved connections to the strategic road network and measures to improve traffic flow along strategic routes and at roundabouts emerged as the measures which respondents felt were most likely to help alleviate Harlow's congestion issues. Measures to improve and encourage the use of public transport were ranked as respondents' third and fourth priorities for consideration. The remaining four options each received lower but roughly equal support, with the exception of the 'other' option which received a low total score but high average score. This is because only a small number of respondents suggested an 'other' measure (48 out of 222 respondents); however of those that did make an alternative suggestion they ranked it as a relatively high priority. A more detailed statistical analysis of the responses to Question 30 can be viewed in Appendix 1 (page 118 to 122).

A summary of the 'other' measures that respondents suggested should be considered is provided below.

- Reduce cost of public transport.
- Increase parking fees
- Limit car parking in residential areas
- Limit development to prevent more congestion.
- Tramway linking new development areas to rail stations of Harlow, Epping and Harlow Town Centre.
- M11 link / bypass.
- The level of congestion in Harlow is questioned by some respondents.
- Ensuring residents to live and work in Harlow, as originally planned.
- More parking near Harlow Mill Station, so people don't have to drive to Harlow Town Station.
- Dual the A414 throughout the town.
- Improve pedestrian and cycle safety to encourage residents to walk/ cycle more.
- Deal with Harlow's congestion problems on a wider scale than simply Harlow.
- A direct route is needed from Eastwick to the Thorley/ Bishops Stortford bypass and then on to junction 8 on the M11.
- A new M11 junction to the North of Harlow would encourage junction hopping and would be counterproductive.
- Extend the Central Line to Harlow, as the overland train is so expensive.
- Improve traffic flow in neighbourhoods through better designed parking solutions.
- Secure bicycle parking is essential.
- An issue with Harlow's bus system is it's easy to get to the town centre but not to get from neighbourhood to neighbourhood, particularly in the late evening. This makes people completely dependent on their cars for relatively short journeys.
- Bus services are unreliable and infrequent.
- There is not enough affordable parking near train stations.
- Improve pedestrian and cycling access to Harlow town station.
- Harlow needs two park and ride schemes, one close to the M11 and another near the station.
- A new bypass and junction is needed near Edinburgh Way to take traffic from industrial areas to the M11, without dragging it all through the town.
- Car pooling (communal ownership of vehicles)



Improvements to public transport and measures to improve traffic flow and connections on the Strategic Road Network emerged as the most favoured options for tackling congestion. However there was broad support for all of the measures that were proposed in the consultation document.

Question 31 – Do you have any further comments to make, at this stage, on how Harlow should be developed?

167 comments were received in relation to Question 31. Issues were raised about the validity of the growth considered now that the East of England Plan is to be revoked. Other comments pointed to recent High Court decisions that Regional Strategies are still a material consideration and whilst others considered that the evidence base underpinning them remains valid.

Comments were made that the need for growth is essential whilst others considered that growth was critical to secure new infrastructure. Some respondents proposed that growth should be determined by local needs. It was also pointed out that Harlow cannot allocate land for growth outside its administrative boundaries.

Some respondents considered that any future growth should conform to the Gibberd Plan and the principles of the Garden City movement. A number of suggestions were made for development to the north, south, east and west of the town. Others commented that infrastructure investment and provision will be required including a new junction with the M11, new link roads together with footpaths and cycle ways as well as improvements to sewage and water capacity. Other community infrastructure will be required including places of worship, schools and care provision.

A range of assets were identified as needing protection including the Green Belt , Green Wedges, the River Stort, open spaces and nature conservation sites, as well as historic and archaeological sites. A more detailed summary of the comments made in relation to Question 31 can be viewed in Appendix 1 (pages 123 to 124).



A wide range of comments were received in relation to this question. The Council is reviewing key elements of the evidence base to ensure that a robust assessment of local social, economic and environmental conditions is undertaken in order to help quantify the appropriate level of housing and employment requirements for Harlow's community.

3.0 WAY FORWARD

The Core Strategy Issues and Options consultation has provided the Council with an opportunity to identify the current planning issues affecting Harlow. It also provided the Council with feedback on a range of potential growth options that were considered by consultants as a way of delivering the future development proposed in the East of England Plan for the wider Harlow area.

The growth options were based on the housing figures for the district set out in the East of England Plan which are to be withdrawn upon the revocation of Regional Spatial Strategies. However, in order to develop a future spatial planning strategy for Harlow it was considered relevant to seek comments on these figures as a starting point in order to help quantify the scale of the town's long term development needs.

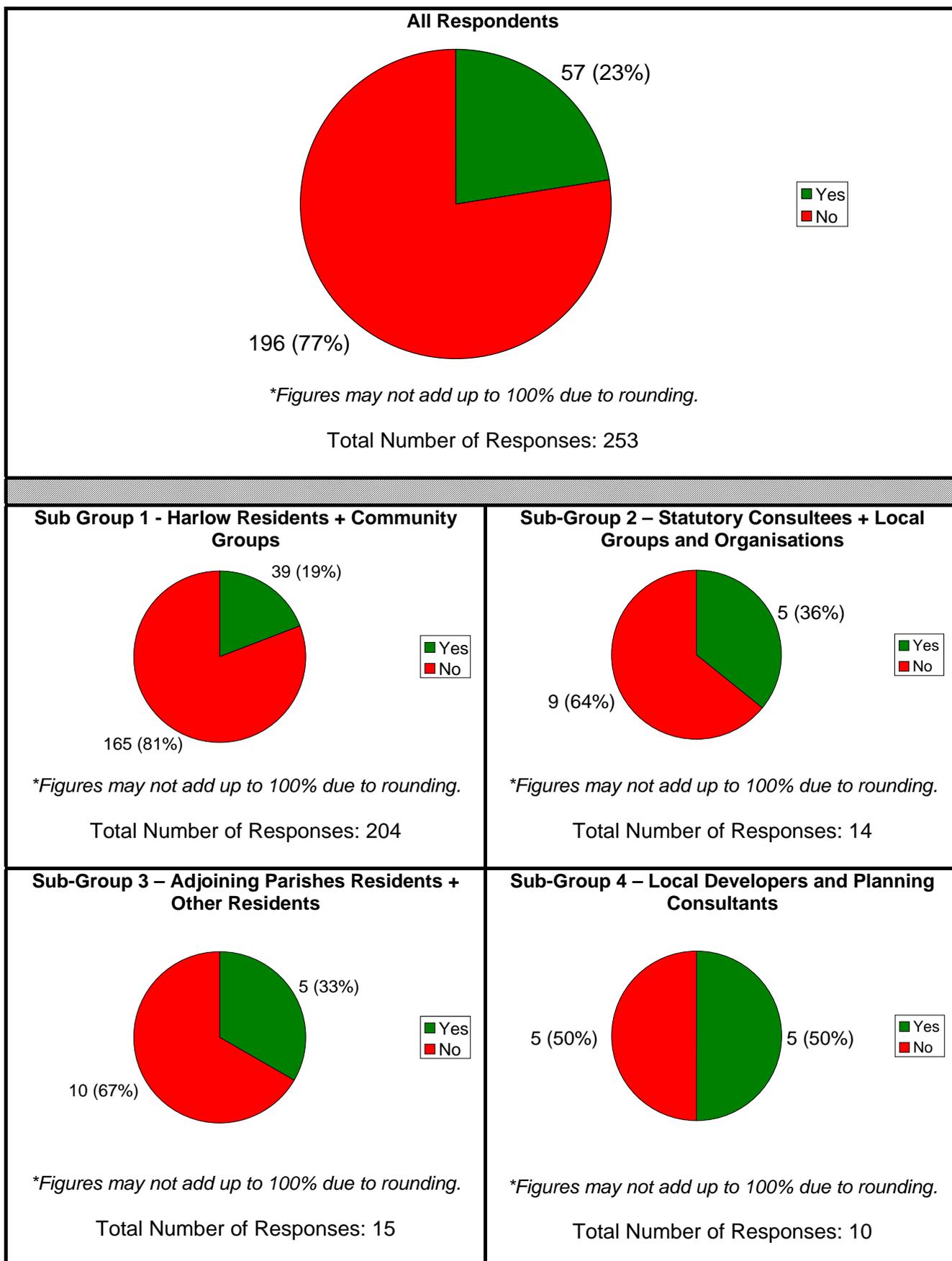
Since the completion of the consultation the Government's Localism Bill was enacted in November 2011. In addition the Government has now published the draft National Planning Policy Framework. This sets out the Government's economic, environmental and social planning policies and articulates its strategy for securing sustainable development.

Both will have a significant impact on the plan making system in England, changing the focus to a greater emphasis on quantifying long term development needs at the local level. In common with many other Local Planning Authorities the Council is reviewing its evidence base to reflect local social, economic and environmental conditions to provide a robust platform to underpin future planning proposals and policies.

In view of the above, therefore, the Council will examine its current programme, as set out in the Local Development Scheme, to ensure that it accords with the emerging plan making system. The Council will also undertake further public consultation on issues that arise from the review of the evidence base to quantify future development needs and to inform the development of the Core Strategy and other local planning documents.

Appendix 1 - Statistical analysis of consultation responses & full summaries of issues raised in open-ended questions

Question 1 - Do you think the Council has identified all the relevant issues that need to be addressed by the Core Strategy?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 2 - If you disagree, what additional issues need to be considered by the Core Strategy?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- The Core Strategy needs to include a mechanism for sustainable growth and regeneration.
- Infrastructure improvements including to road and rail systems, water supply, drainage and sewerage disposal, health, education and community facilities should be implemented before any further significant development is allowed.
- The Core Strategy should provide a method to ensure necessary infrastructure is achieved to support sustainable development.
- Housing should be provided for Harlow people not to accommodate overspill from London.
- The creation of new jobs and attracting companies to invest in Harlow must be a priority.
- Potential for rat-running between Gilden Way/Churchgate Street and the M11.
- Infrastructure improvements are needed just to cater for Harlow's current needs. Even more improvements will be required if the town grows significantly.
- There is a high level of unemployment in Harlow – especially among young people.
- Need to ensure development meets the needs of disabled people - specifically those with mobility problems.
- A by-pass/link road is needed from the A414 to the M11.
- Plans must take conservation areas into consideration.
- Previously developed land should be developed instead of green sites.
- Better facilities are required within the Town Park e.g. play schemes.
- Green Belt land should not be developed.
- The flooding of roads is a problem which needs to be addressed.
- Infrastructure for water supply and sewerage disposal should be given more prominence.
- Traffic congestion is a problem in the town.
- Further development could result in the loss of key archaeological sites
- Water supplies and drainage needs should be considered if there is future development.
- The requirement for traffic management measures should be included the Core Strategy.
- Further development in Harlow will affect the character of Old Harlow and parts of Hertfordshire.
- Traffic congestion is a significant problem in Harlow and the town's roads are already overcrowded.
- Green spaces should be retained for leisure/recreation purposes.
- Harlow has a high number of unoccupied homes.
- A number of existing primary schools in Harlow are undersubscribed.
- Provision must be made for extra medical and education facilities.
- Development will put too much pressure on infrastructure including local roads and health centres.
- Development would affect traffic congestion, archaeological sites, and flood risk, access to healthcare and transport hubs.

- Consideration should be given to the effects of development on the original Gibberd Master plan which provided for an integrated community with protection for green spaces and the environment.
- Development should only be to meet local needs, not the inflated targets of the East of England Plan.
- Consideration should be given to parking provision, traffic management, schools, facilities, crime, loss of green space and the environment.
- Further development would lead to serious congestion, flood risk, increased crime, and increased pressure on the NHS.
- Overpopulation of a rural area.
- Additional housing will increase further the already high unemployment and existing infrastructure issues.
- Not enough consideration of supporting infrastructure including road access and traffic congestion.
- The Core Strategy needs to make the town 'work', not just expand.
- Developments only serve the interests of the building companies not the residents.
- Development will place additional burden on road routes to the M11 and the railway station and additional roads will damage the local community.
- Development could result in the loss of local agricultural land.
- Sustainability is an issue that needs to be considered (in particular recycling and the green agenda).
- The Plan should be based on the creation of employment through enhancing the town as an attractive place to live whilst investing in skills and training.
- Where are the plans for the infrastructure to support the plans?
- The views of local people should be taken into consideration.
- Traffic flow into Harlow from Shearing and Sawbridgeworth is an issue.
- No provision for infrastructure, road, rail, water, sewerage and community facilities.
- Road and rail infrastructure, health services and schools.
- A plan is needed to address the present and immediate planning problems facing the town which would lay a foundation for any future development.
- The Core Strategy does not provide for the required improvements in infrastructure.
- The necessary infrastructure requirements need to be properly costed.
- Harlow desperately needs a bypass before any further development.
- Existing open spaces should be safeguarded.
- Agricultural land needs to be retained for imminent demand for food production.
- The provision of infrastructure improvements is dependent on the contribution that can be made by bodies other than the Council.
- Harlow's green wedges should be retained for future generations.
- Harlow's infrastructure is already inadequate for the current size of the town.
- Open space should be provided in parkland settings for enjoyment by the public.
- Transport issues in Harlow are an urgent priority.
- Expansion should be directed towards the west of Katherines, towards the Nazeing borders, and to the south towards Epping.
- The provision of working facilities in the town for future generations.
- Parking is a problem in Harlow.
- Existing community facilities throughout the town need to be retained including the Museum, The Gibberd Gallery, Pets Corner and The Playhouse.

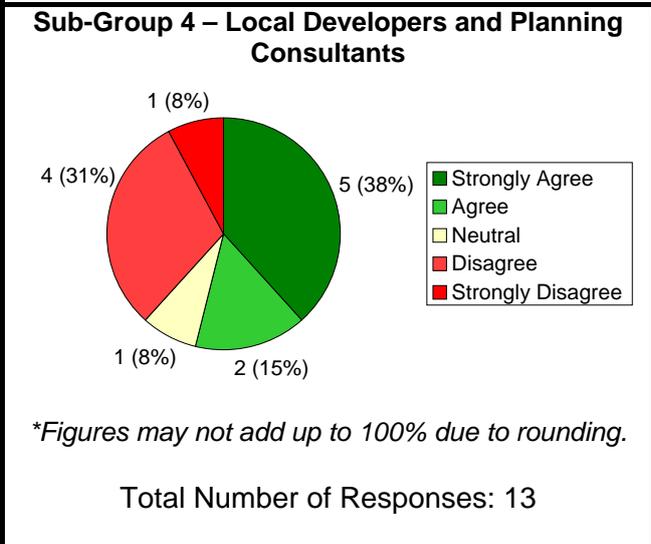
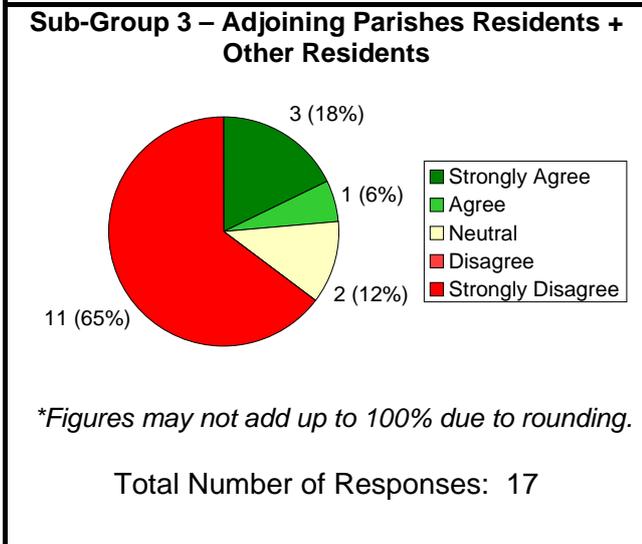
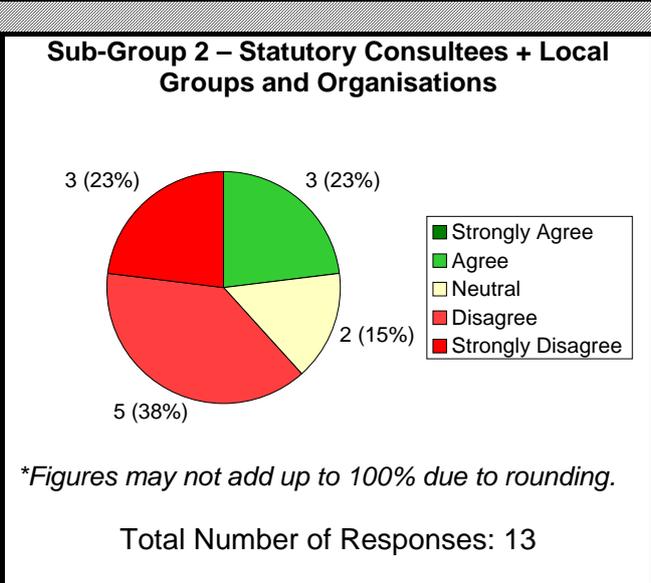
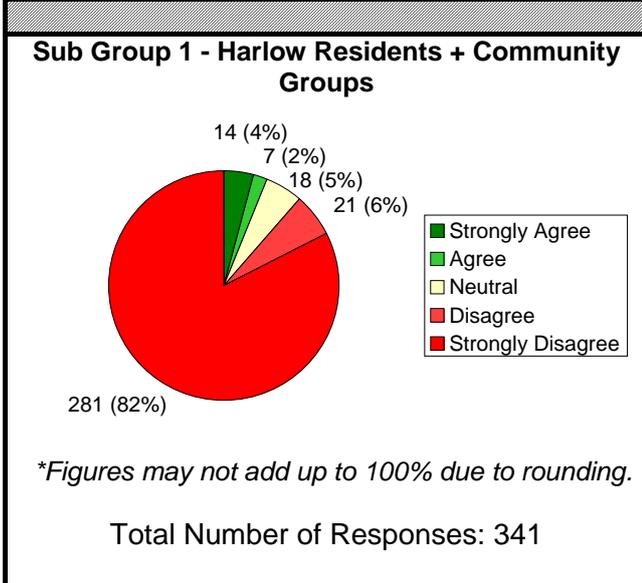
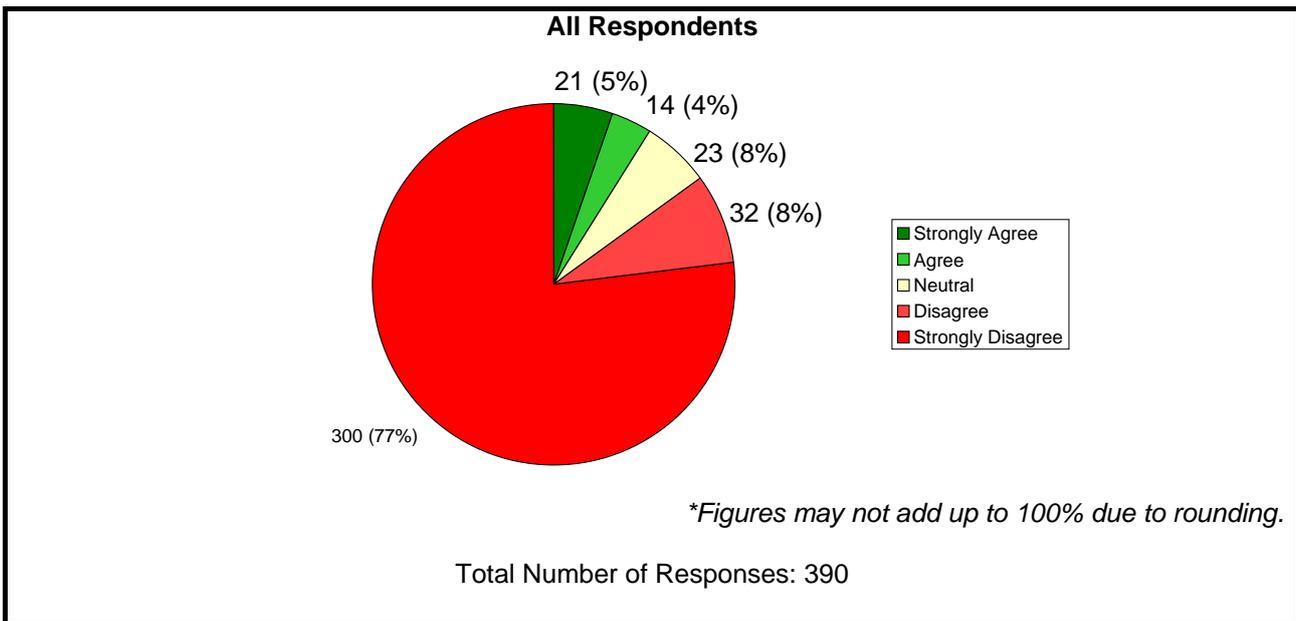
- Extension of the Central Line (Underground) to Harlow is a requirement.
- Traffic congestion is a major problem and access to the M11 from the north side of the town is essential.
- Lack of sufficient infrastructure improvements.
- Rail and road links, congestion, waste supply and sewerage disposal, the need for extra schools and health centres need to be considered.
- Transport infrastructure is inadequate in Harlow and will be overloaded if population growth is not accompanied by considerable investment in roads and public transport.
- Listed buildings, ancient monuments and gardens should be protected which will constrain the areas that can be developed.
- I support the regeneration of neighbourhood centres but not their wholesale redevelopment.
- The Town Park should be improved and enhanced but the location of its facilities should not change.
- Consideration must be given to the impact of major developments on air traffic through the increased road traffic that would be generated.
- Old Harlow and Churchgate Street are a natural boundary to Harlow New Town.
- Affordable housing required for Harlow residents.
- Shopping offer not attractive in Harlow and most people prefer to shop at Lakeside.
- Alcohol and drug abuse, regular and irregular immigration, promotion of integration, mental health issues, noise nuisance.
- Issues identified under housing category need to be more general to avoid prejudging a robust analysis of issues.
- Land outside of the district would be needed in order to meet EEP housing requirement housing.
- Consider the planning needs of faith groups and the spiritual environment before any plans are drawn up.
- Need a bypass and additional access to the M11 north of Harlow before any further new development.
- More emphasis should be put on sustainability considerations including need to recycle, energy efficiency, and water usage and carbon reduction.
- The Green Belt is valued land which plays a strategic role.
- Development has resulted in parking pressure in the Old Harlow area, particularly near Harlow Mill Station.
- Future development should be based on local needs and not on the East of England Plan or any national strategy.
- So much new development will put more pressure on the Council to provide services at a time when its budgets are being cut.
- Harlow's heritage as a 1950s New Town needs to be preserved.
- Harlow needs more social housing to reduce the waiting list.
- Need to avoid Harlow merging with adjoining towns and villages.
- Improvements in public transport will be required for people who don't own / have use of a car as the high price of oil makes private transport very expensive.
- A stronger cross-border approach will be needed to deliver the Core Strategy.
- Many of Harlow's jobs and facilities are taken and used by the residents of neighbouring districts.
- Must identify how investment will be gained from outside the urban boundary in addition to building houses.
- The first priority should be to address local employment provision.

- All new developments must be sustainable.
- Issues are not static and further issues could come to light during the (Plan) development process.
- Harlow needs a coordinated and integrated transport strategy.
- The River Stort is a natural boundary and flood plan and all the options to build north of the river should be discounted.
- Need to ensure Harlow residents have access to a range of community infrastructure.
- A better housing mix is required to avoid the creation of ghetto areas within the town and to break-up areas of low aspiration.
- Harlow needs more good schools including pre-school, primary and secondary schools, and improvements to existing ones.
- The hospital, Police and Fire services will need to be expanded to meet the proposed level of growth.
- A leisure park should be included within the Plan to improve and expand the leisure services in the town.
- Publicly-owned land at Latton Farm should be used for development before any land outside Harlow.
- The Core Strategy should provide housing for people on the Council's waiting lists not for more affluent commuters.
- Harlow people's wishes should be considered in more detail.
- The Core Strategy does not provide for the required improvements in infrastructure.
- Harlow has an ageing population so consideration must be given to requirements for Care Homes, Warden-Assisted and Sheltered Housing and day centres for the elderly.
- Water supply, sewage and surface water drainage already an issue which will get worse if more land is covered by development.
- The Core Strategy makes no suggestion of infrastructure improvements to local road network or rail facilities, other amenities including water and sewage, or other community facilities such as local libraries which will be heavily oversubscribed.
- Harlow needs more low rent accommodation. So called 'affordable' housing is outside most people's range.
- Car parking in residential estates is an issue.
- Consideration must be given to additional parking at railway stations.
- Section 2.5 Infrastructure only considers grey infrastructure – predominantly transport – and should also consider green infrastructure which is vital to the future health, prosperity and sustainability of the district.
- Climate change should be identified as a key issue for consideration.
- The policies and objectives of the Core Strategy should be aligned with those of key infrastructure providers.
- The capacity of existing healthcare infrastructure needs to be included in the assessment of infrastructure requirements to serve the proposed levels of growth.
- The impact that proposed developments will likely have on healthcare provision (including primary care services) and funding needs to be recognised.
- The cumulative impact of growth proposed in East Hertfordshire and Epping Forest districts on healthcare services, facilities and funding needs to be considered.

- There is a need for further characterisation and assessment of the historic environment of the town. The Market Place and other surviving parts of the Town Centre should be designated as Conservation Areas.
- The Core Strategy fails to address a number of environmental issues including:
 - There is no reference to groundwater protection.
 - There is no reference to contaminated land or implications of redeveloping land affected by contamination.
 - The Water Framework Directive has not been mentioned at all.
 - Biodiversity has not been mentioned, in particular around the Stort Valley.
- The strategic role of the Green Belt and the related policies of adjoining authorities should be recognised.
- The wider landscape setting of the town, including the southern ridge line.
- The lack of alternatives to the option of 16,000 houses.
- More prominence to climate change and more commitment to carbon reduction, energy efficiency and renewable energy.
- The setting of the town in relation to its surrounding villages.
- The role of the Metropolitan Green Belt.
- There is a need for joined up thinking with neighbouring authorities.
- Sustainable transport should be emphasised further.
- Theatre provision has been inappropriately included within Recreation, Sport, Leisure and Open Space (Para 2.12.2) which will defer to PPG17, whereas theatres should be guided by PPS 4 as a town centre element.
- A proportion of all new dwellings across all tenures should be built to recognise wheelchair housing specifications e.g. Habinteg and Thorpe.
- Insufficient emphasis on the need for all new dwellings to meet Lifetime Homes criteria as necessary to achieve social sustainability in the community.
- There should be a reference to 'inclusive play facilities in all types of play areas.
- The Core Strategy needs to address the need for safe walking routes and to segregate all walking and cycling routes on shared surfaces.
- Inclusive design needs to be adopted as a core principle of the Plan.
- There are housing shortages in the District and wide sub-region / region and failure to deliver significant housing and diversifying the housing stock will exacerbate social economic deprivation.
- A greater expansion is needed to realise the transformational change required to alter the image and perception of Harlow for existing and future residents and employers in order to attract inward investment.
- Local residents have difficulty finding high quality jobs.
- High earners are unwilling to locate in Harlow.
- Economic growth should be linked to new housing to attract and retain the skills base needed to encourage inward investment.
- Significant housing is needed to avoid the serious consequences of business growth without sufficient labour supply.
- Harlow has archaeological and historic landscape assets that need to be protected.
- The policy areas do not refer to Harlow's historic environment.
- Harlow Council's support for the level of development justified in the RSS evidence base means housing needs will also be met which are not locally based.
- A number of issues addressing common topics such as the Town Centre cut across a number of the proposed Themes which do not provide a clear enough framework for the issue to be set out.

- A framework should be developed to define and measure the outcomes of the Core Strategy.
- There must be housing for all socio-economic groups – including for professional and higher income households - which is distributed throughout Harlow.
- Other physical and social infrastructure should be acknowledged in addition to transportation infrastructure to ensure the delivery of a sustainable community for existing and future residents, investors and visitors.
- Elements of Harlow's Core Strategy will require the help and support of adjoining Districts as much of the land with potential for expansion lies outside the district.
- A joint policy and implementation area for Harlow's growth should be created including parts of Epping Forest and East Hertfordshire districts as well as Harlow.
- Consideration of Greenfield development should reflect options to the north, east, south and south west of the town.
- The statement in Section 2.3 that "Greenfield development should be located in the north and east of Harlow" pre-empts the policy process.
- Industrial regeneration is desperately needed and there are empty large sites that should be redeveloped.
- The entrance and exit in to Harlow is a bottleneck.
- Not enough emphasis on building on the Gibberd Principles.
- No account is being taken of the real and existing housing needs of Harlow.
- In accordance with PPS 3, Section 2.2.5 (land use) states previously developed land should be utilised before Greenfield land, however the Core Strategy needs to ensure sufficient land is available to meet to substantial existing and growing demand and so should plan for the selective release of Greenfield sites.
- Joint working with adjoining authorities to facilitate the regeneration and transformation of Harlow should be reflected as a key issue on the Core Strategy.

Question 3 - Would the provision of 16,000 new homes in and around Harlow meet the current needs of the local community and help secure the regeneration of Harlow?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

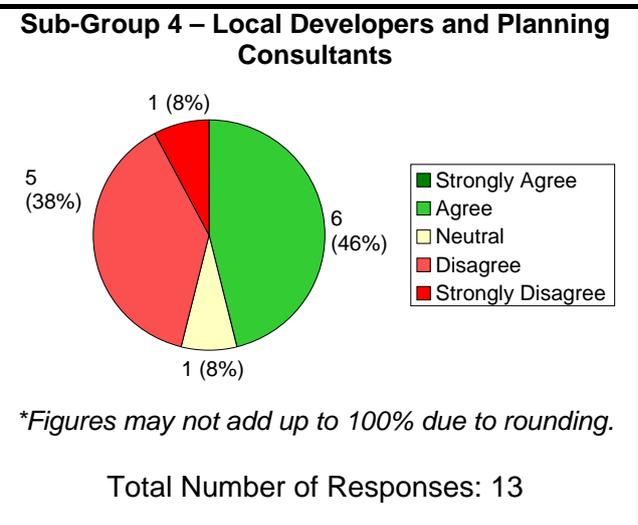
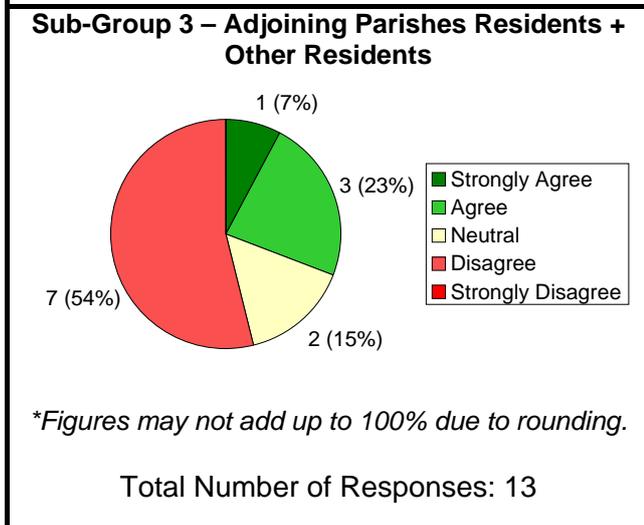
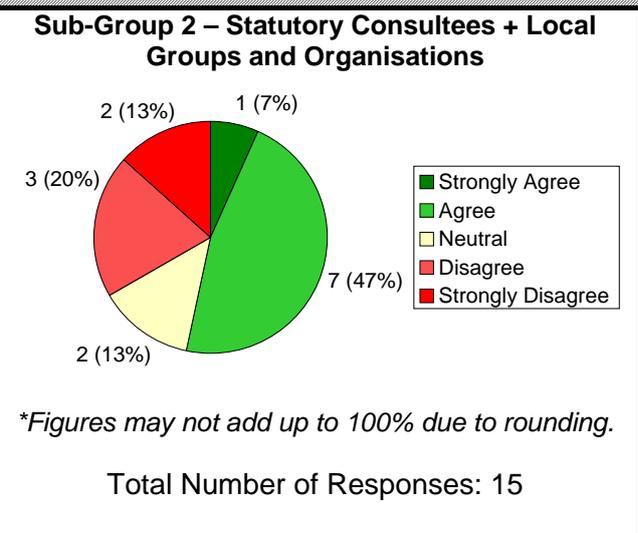
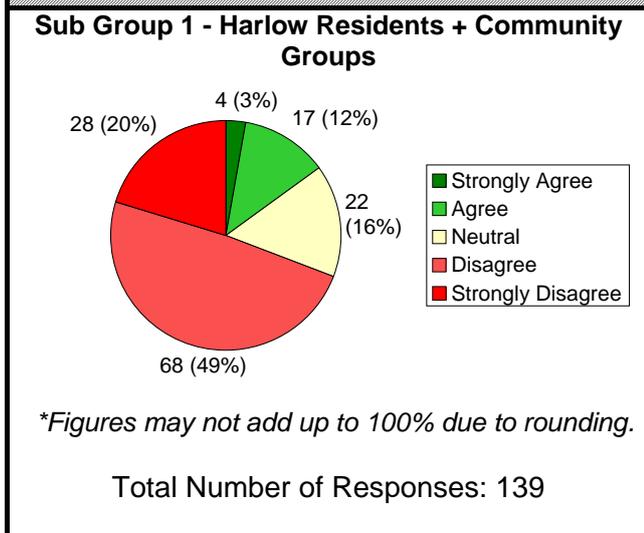
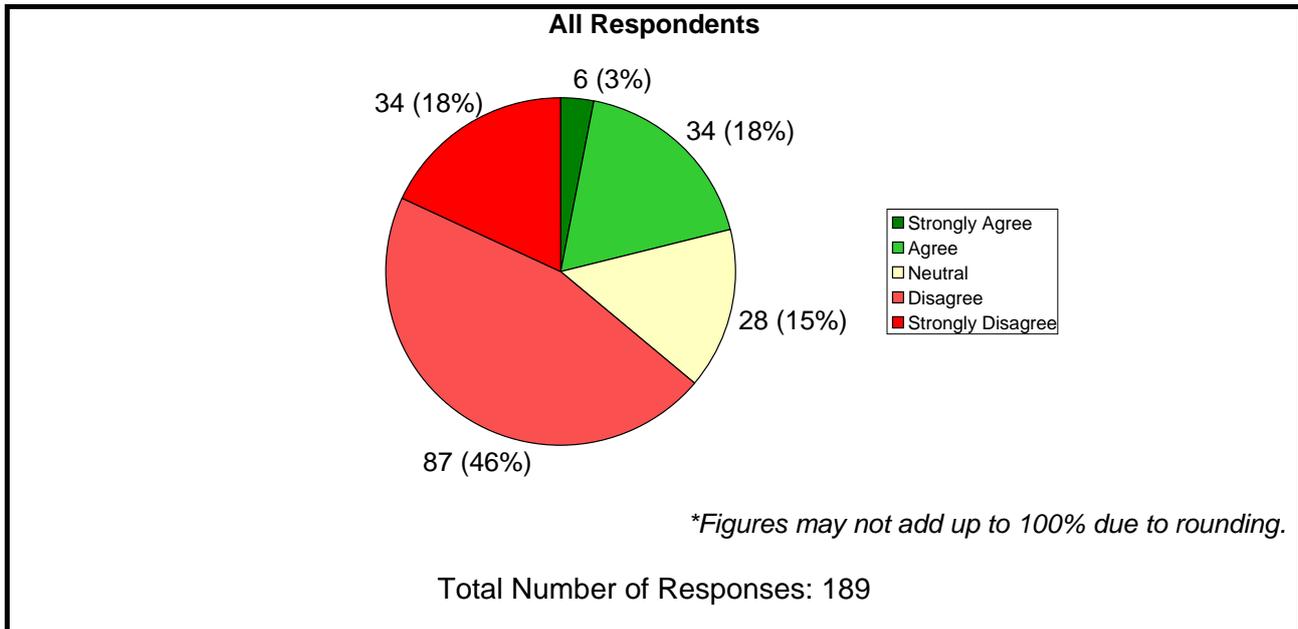
Question 4 - What do you think the scale of growth should be, ensuring that the Core Strategy addresses the particular issues facing Harlow?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- To meet local needs
- To meet local needs - not the inflated targets in the East of England Plan (144)
- Provide a good standard of housing
- Affordable housing should be a priority to meet local needs
- No more private housing in Harlow
- Overdevelopment proposed in the Old Harlow Area
- Less than 16000 homes
- 800 new homes maximum
- Many empty homes, suggesting too many houses
- 16000 houses are too many.
- 16000 will have an impact on public transport, sewerage, water and the countryside
- Don't develop green areas
- Detrimental impact on the road network
- Existing housing sites are not completed, so why build more
- To meet the requirements of sustainable growth
- Surrounding countryside would be ruined
- Previously developed land should be developed in the first instance
- Core Strategy based on belief that 16000 homes and 8000 jobs will create the critical mass for regeneration
- The vision should be based on more modest increases
- Increase in traffic and pollution from Growth will cause health problems
- Not enough support for regeneration projects
- Local facilities will be unable to cope.
- Build housing in line with jobs
- Repair and rebuild existing housing
- Explore growth within town boundaries
- Strong evidence to show local housing need
- Develop at a slower pace than proposed
- The link between regeneration and growth is not made conclusively
- Damaging impact on the environment and wildlife habitats
- Need realistic estimate of local needs
- Max 8000 new homes
- Over development in the south east to the detriment of the regions
- 16000 homes in and around Harlow would go a long way to meet current needs
- Growth should be phased to meet needs
- 16000 homes may not be viable, and will undermine Gibberd's Masterplan
- 10000 maximum to meet local needs
- 4000 dwellings in Harlow North and follow Gibberd's 1974 expansion masterplan
- Housing for Harlow people not catered for.
- 16000 need the associated jobs
- No evidence that the private sector intends to invest in Harlow.
- To cater for local needs and local employment

- Housing of a standard that will attract those who work in Harlow but choose to work elsewhere.
- 2000 maximum
- Regeneration should begin now
- Harlow is full
- 5000-8000
- Not enough jobs for 16000 dwellings
- Tenet of Core Strategy is misplaced and unsustainable
- 1000 would easily meet local needs
- Focus should be on business and industry for regeneration not the other way round.
- Additional 5 years of growth should be added to 2026, therefore 20000 dwelling requirement
- 16000 imply inward migration.
- Scale of growth should be determined by additional employment provision
- 4000 dwellings
- Homes will not resolve lack of employment opportunities and will mostly attract commuters.
- 5000 homes to the east by 2030 then 2000-3000 later
- Policy and Strategy needs to connect old with the new.
- Plans are rapidly becoming out of date. Potential of double counting of people on housing waiting lists
- Why equate growth with regeneration
- Harlow does not need regeneration. It has been allowed to become rundown
- At this level of expansion, we need to look at reconstructing the town, to allow further future expansion.
- If 5000 are planned do we need 16000?
- The more houses you build the more you will have to build in the future.
- Growth delivery in a timely and phased manner is welcomed.
- Redevelop existing, to provide better designed, but at higher densities.
- No proven link between town size and regeneration, flaws in critical mass theory
- Growth led regeneration will enable the town to generate the critical mass to bring investment, and secure it as a key sub-regional centre.
- Do nothing will cause Harlow's economy to decline.
- Harlow's location enables something to be done to address the shortfall in housing
- None of the considered evidence has changed from the East of England Plan
- 16000 homes and 8000 jobs would help secure the regeneration of the town
- Harlow working with neighbouring authorities will have to determine the amount of new housing for the Harlow area, taking into account existing evidence base.
- Technical assessment of housing requirements is required informed by population and household projections. This should be one jointly with adjoining Districts to a common methodology.
- Growth is the only way to achieve a successful regeneration of Harlow, and attract and retain economically active and highly skilled people.
- Substantial growth will facilitate an expanded range of town centre retail and leisure provision, and justify and fund investment in services and infrastructure..
- 16000 to 2021 and a further 10100 to 2031 failure to provide this level will not facilitate transformational change.

Question 5 - Do the visions and priorities set out in the Community Strategy, the Council's Regeneration Strategy and the Council's Corporate Plan provide the basis to develop the vision for Harlow's Core Strategy?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

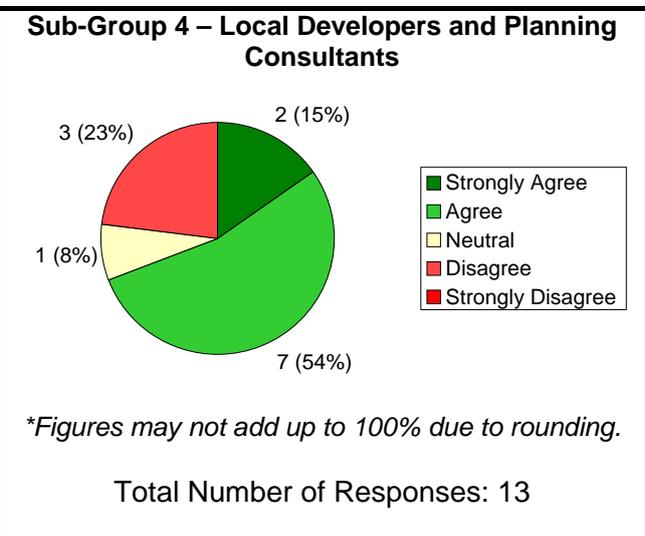
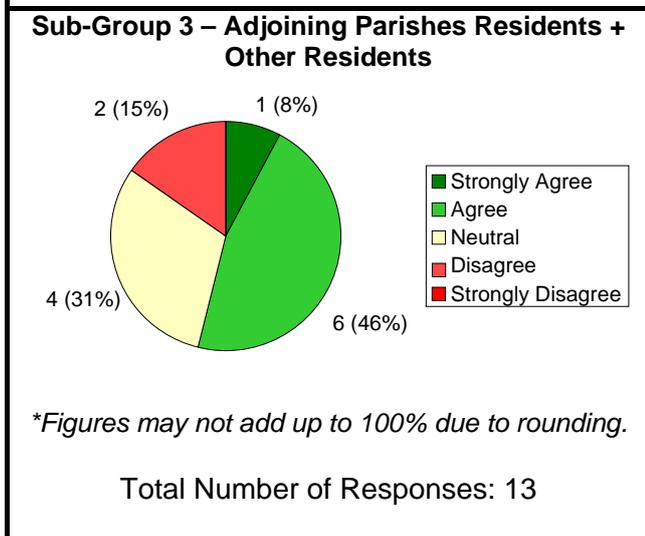
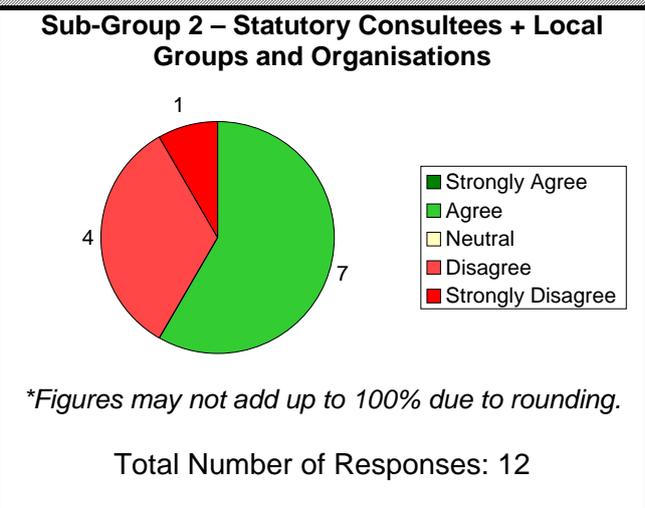
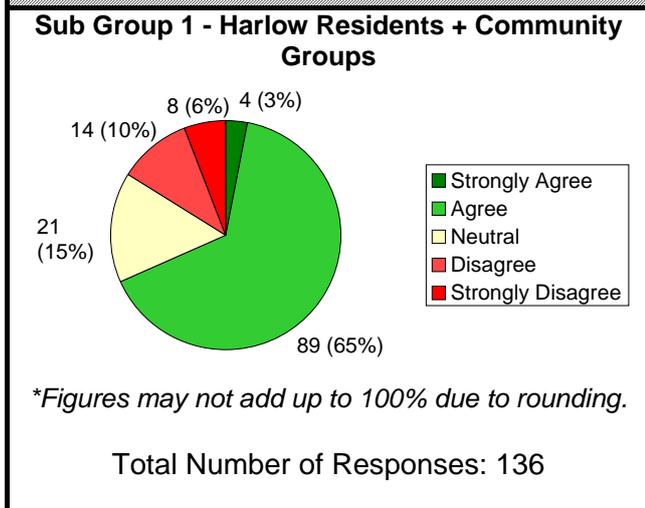
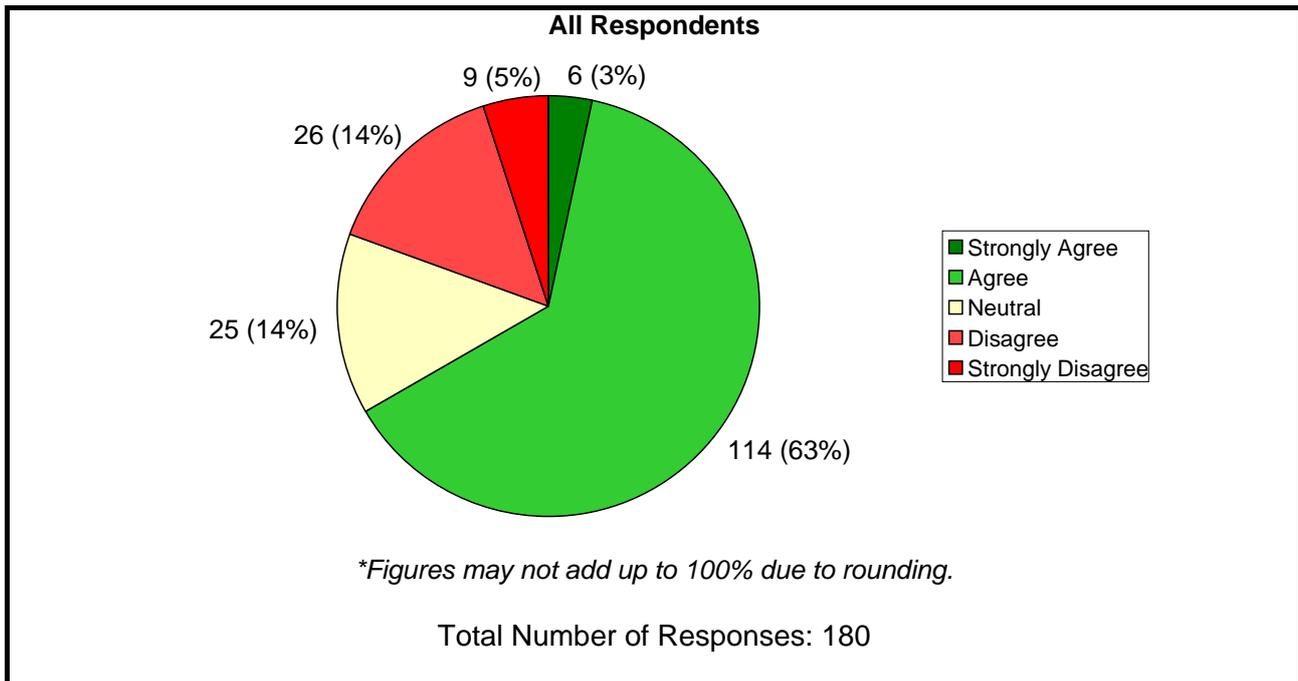
Question 6 If you disagree/strongly disagree, what do you think the vision for the Core Strategy should be based on?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- Core Strategy based on belief that growth around the level of 16,000 homes and approximately 8,000 jobs will help provide critical mass for regeneration. The vision should be based on much more modest increases and recognise the difficulties creating so many jobs (38)
- The strategy should plan for lower levels of growth, based on local needs (7)
- Houses and jobs alone do not regenerate a town (3).
- Strategy should be based in part to Frederick Gibberd's outlook on a regeneration masterplan (1) Jobs are more likely to be lost, not gain in the current climate (3)
- Community Strategy is inadequate to meet Harlow's aspirations and does not describe the opportunity that the town represents for the wider area. The vision needs to be more ambitious, locally distinctive, and be in no doubt where the town is heading. It should focus on articulating what needs to be done to address its key spatial planning issues. Recommend that the vision includes wider issues that will seek to facilitate regeneration within Harlow (2)
- Plan is based on 'critical mass' idea from the East of England Plan which should be replaced with more modest needs, re-thought in the light of present economic climate (1)
- Too ambitious to believe 16,000 homes and 8,000 jobs will provide the critical mass for regeneration.
- Growth is too high. We need more evidence that growth could be 16,000 and 8,000.
- Strategy should be based on maintenance and renewal of services and not expansion of the town.
- Vision is unobtainable without substantial investment. Partners unlikely to be able to deliver the investment required.
- Focus less on aspiring to be a university town and more on vocational and technical training institutions (1)
- Strategy prepared in an era of regional planning. Until a robust evidence base has been established, there is no basis in these documents for growth outside Harlow District.
- Need a vision and priorities as set out in part 4. Regeneration and renewal are important aspect of Harlow's future. Harlow has the ability to change whilst keeping the fundamental elements of its historic past. Our legacy is based around renewal (1)
- Input on the cultural aspect is needed to make Harlow a vibrant exiting town it once was (1)
- For regeneration to be successful you need to make the town centre more appealing, reducing parking costs, encouraging people to use the town and doing up the north part of the town centre. Reduce rents and encourage a variety of shops (1)
- Do not agree that housing will provide necessary catalyst for wider regeneration. Development should be more focused on specific issues rather than the notion that 'more' will solve the problems facing the town.
- Growth options fail to consider the core of the town as the centre.

- The vision should be more exciting – the vision should be explicitly aspirational and not mundane and corporate.
- Should regenerate and revitalise the current town and encourage industry to return to Harlow. Make Harlow a place for business to gravitate to.
- Vision is a good starting point but there needs to be a good management plan to ensure that the vision strategies are fulfilled. Concerns over how schemes will be delivered in current climate.
- Vision and priorities generally provide a suitable basis to develop the Core Strategy. However, the priorities should refer to the town's role as a key centre for growth. This is consistent with both the EEP and Gibberd's vision.
- Agree with vision if it can be fully implemented – Vision should take full account of the equivalent documents of adjoining authorities.
- Visions are solid and succinct and when combined will provide a stable underpin for the objectives and subsequent policies.
- Vision should refer to a strong town centre and retail destination.
- Visions are quite generic and could apply to any town 2
- Vision should be more specific to what the document is actually trying to achieve. The vision should make explicit reference to population increase.
- Vision should more explicitly point to the growth of the town.

Question 7 - Do you think the Core Strategy Themes cover the range of planning issues in Harlow?



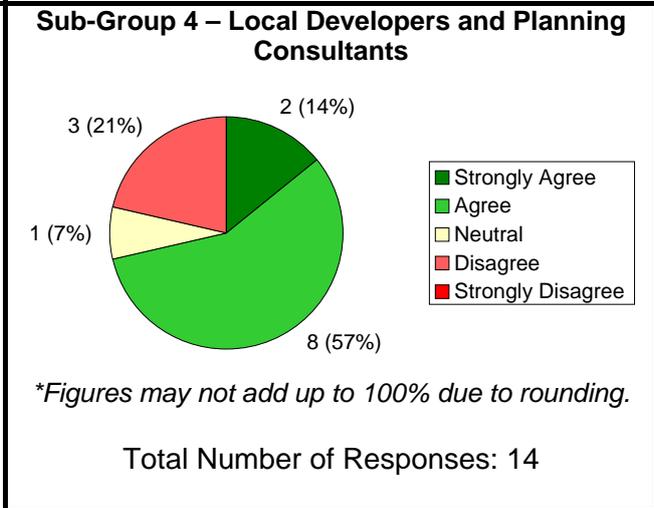
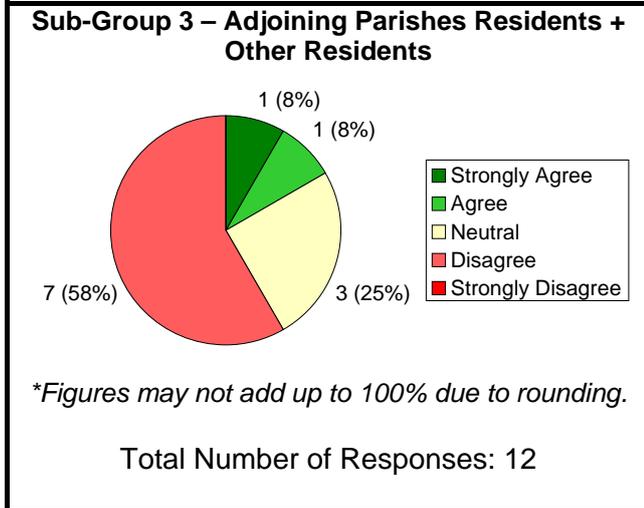
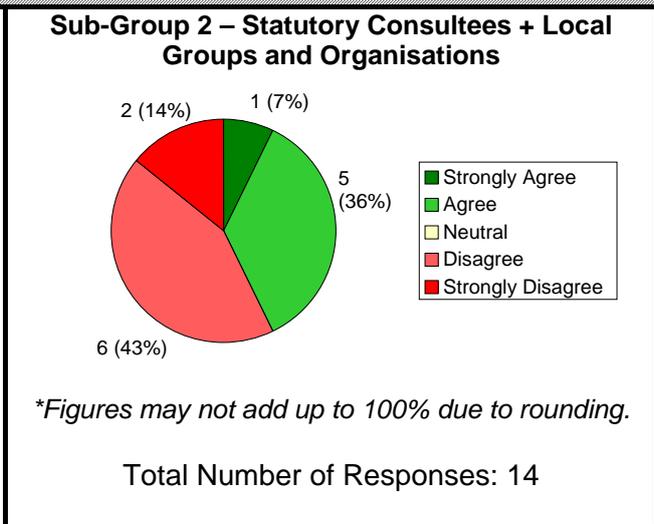
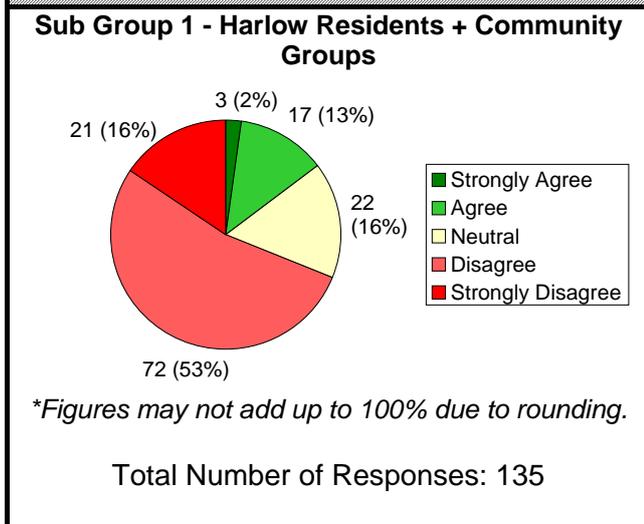
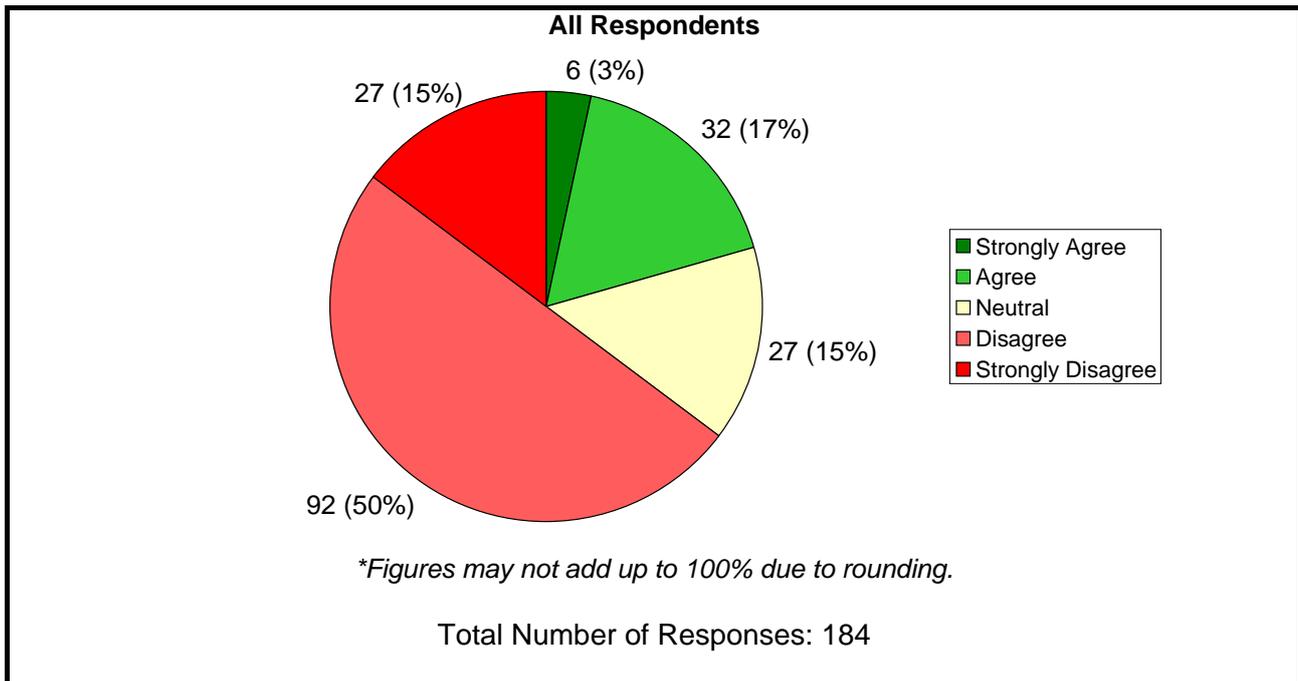
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 8 - If you disagree/strongly disagree, what changes would you make to the Themes to ensure they address the range of planning issues in Harlow?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- Overloaded infrastructure including transport, sewerage, hospital, GP services (8)
- Need to protect green wedges and open spaces (3)
- Lack of parking provision (2)
- Need specific inclusion of a 'health' theme (2)
- Specific reference should be made to the redevelopment of the town centre and surrounding neighbourhood areas (2)
- The Environment should have its own section – and include reference to protecting air, land and water (2)
- Include a theme which acknowledges the need for cross boundary working, co-ordination and governance issues (2)
- Themes should deal more specifically with recognised topics that more clearly reflect Harlow as a place. This would make it easier for the issues, objectives and policy areas to identify matters that are specific to Harlow (1)
- Need to include an objective of creating the right quality of employment premises as distinct from housing (1)
- Stronger emphasis on preserving the historic, iconic and natural environment wherever possible. Regeneration should be prioritised over new build on undeveloped land (1)
- Specific reference should be made to the historic environment, social infrastructure and climate change in the themes (1).
- Opposed to development which disrupts the wildlife, the natural countryside and above all out archaeological remains (1)
- Not enough emphasis on quality of architecture and green spaces (1)
- Agree with 4.3. and 4.4 but don't understand what resources would be put in place these into action. There is not enough explanation of how this will be delivered (1)
- Harlow's boundaries should be respected so as to preserve the rural character of the countryside (1)
- Welcome the recognition of infrastructure as a key theme (1)
- appreciation of the regional purpose of the Green Belt; (b) the need to contain growth within the bowl of the Stort Valley, protecting the southern ridge line; (c) more prominent and positive support for sustainable construction, carbon reduction and the use of renewable energy; need for formal co-ordinated working with adjoining potentially affected authorities (1)
- The setting of the town in relation to surrounding villages, the role of the Green Belt, joined up thinking with neighbouring authorities (1)
- Pleased with the themes that relate to the river Stort. Strategic objective 24: an opportunity to enhance public transport and cycleway links to rail and bus stations (1)
- Specific reference to achieving social sustainability (community building) within an increasingly diverse community (1).
- Should acknowledge that the housing, employment and retail development provisions should all seek to meet more than just locally generated needs (1)

Question 9 - Do the Strategic Objectives provide the necessary framework to deliver the regeneration of Harlow?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 10 - If you disagree/strongly disagree, what changes would you make to the strategic objectives?

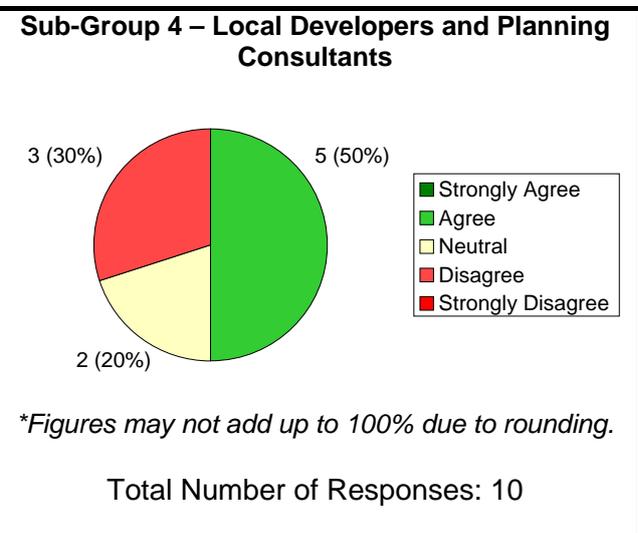
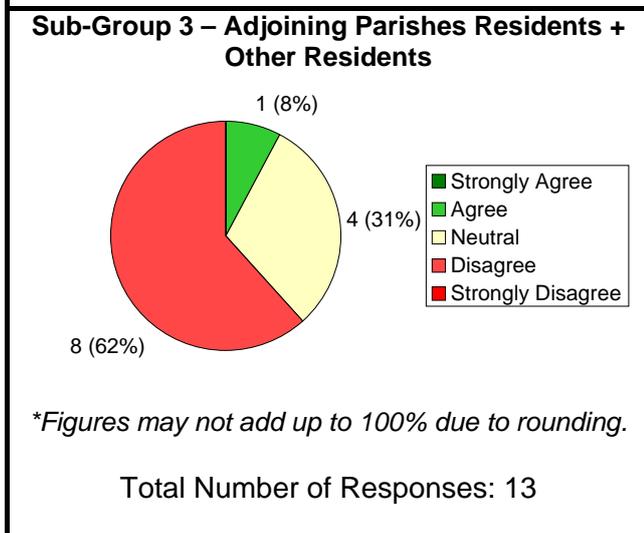
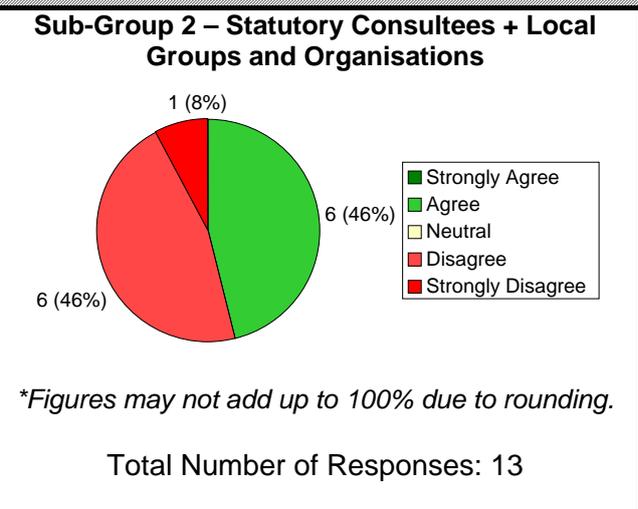
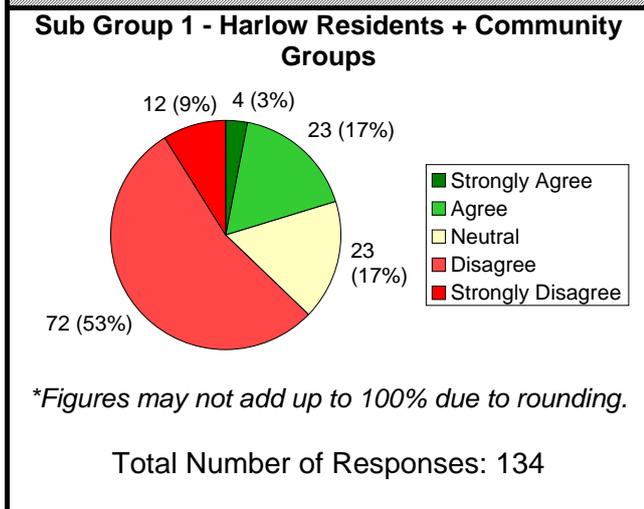
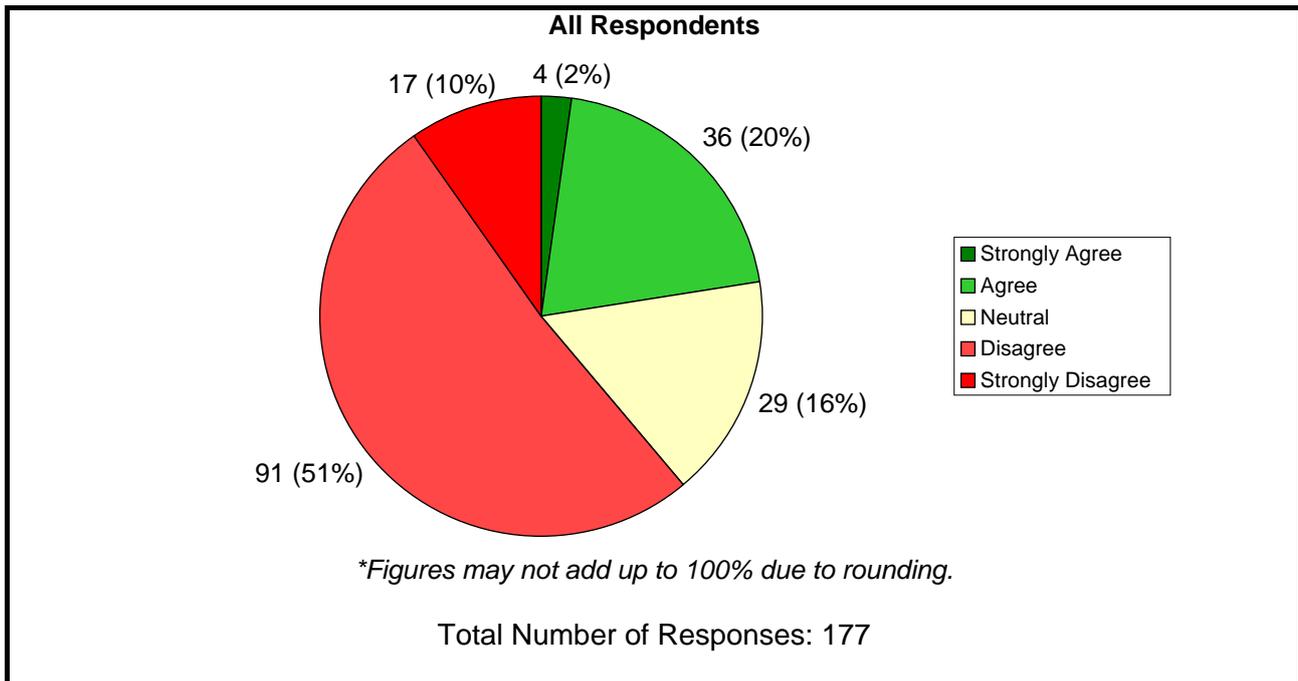
Detailed changes to wording of the strategic objectives were put forward. See schedule of responses for full details.

- Main changes include:
 - Objective 4: Allow growth only in sustainable areas
 - Objectives 8 & 9: Rewrite to reflect the need for housing tenures and types to meet local need
 - Objective 17: Include employment uses in town centre regeneration proposals to provide capital market for new retail and leisure.
 - Objective 24: Rewrite to include Northern bypass and new M11 junction

 - Objective 1: protect green wedge areas
 - Objective 4: add town centre to this paragraph
 - Objective 6: Ensure new infrastructure
 - Objective 9: Ensure new housing caters for our local needs and those people coming into Harlow for work
 - Objective 3: change 4th paragraph to read 'acknowledge and build on principles of Gibberd.

- New strategic objective to refer to need for delivery agency and the role of adjoining local authorities.
- Allow growth in few locations. Recognise need for housing tenures and types to meet local need. Include employment targets in town centre regeneration (6)
- More emphasis on enhancing the town centre
- Sufficient housing to meet local needs and growth in selected areas. Also look at growth with current job prospects in mind.
- Respect Gibberd's Masterplan
- Concentrate on developing Brownfield sites first
- Greater provision of affordable and rented accommodation
- Strategy does not say what is to be regenerated other than the town centre.
- Stronger focus on redeveloping the hatches
- More focus is needed on the delivery and implementation of the strategy.
- Objectives should be fully funded before they are put in the Core Strategy.
- Further work on characterisation of heritage assets is required.
- Housing and employment growth should be linked.
- Joint or co-operative working should be a theme of the Core Strategy, with related objectives, given the regeneration agenda.
- Question whether there is adequate evidence underpinning the objectives particularly where growth affects adjoining districts.

Question 11 - Do you think the policy areas identified cover the range of issues that are relevant to the regeneration of Harlow?



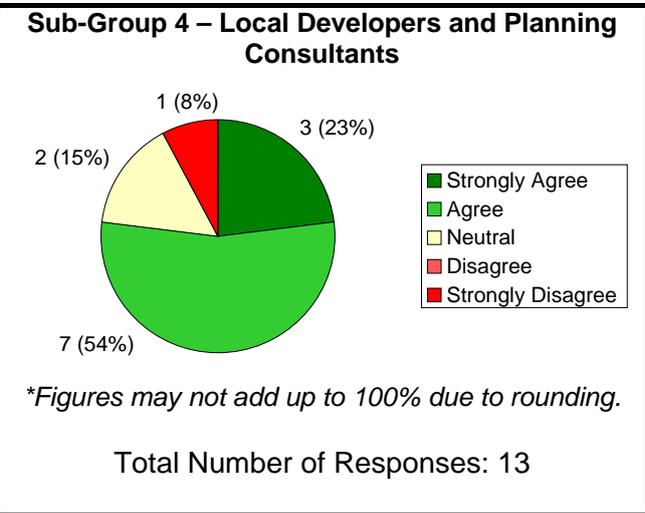
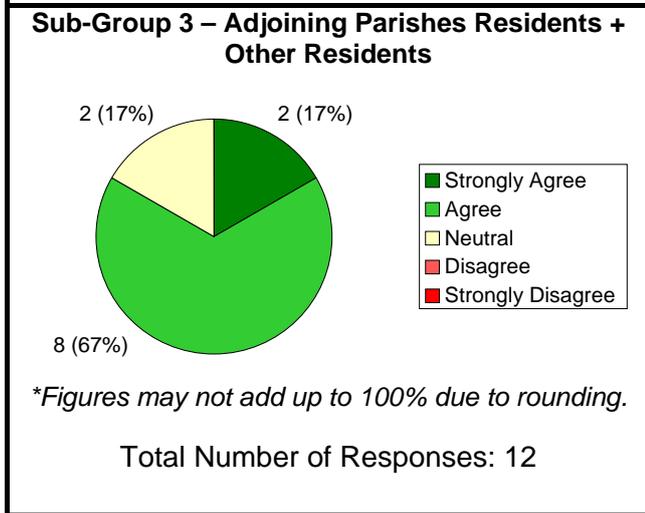
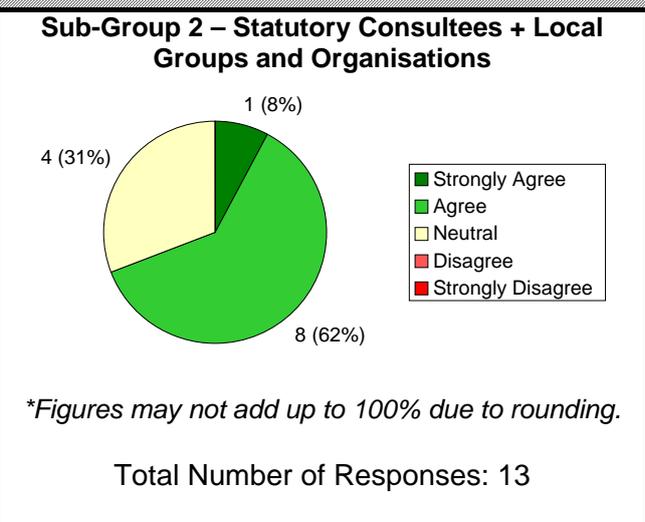
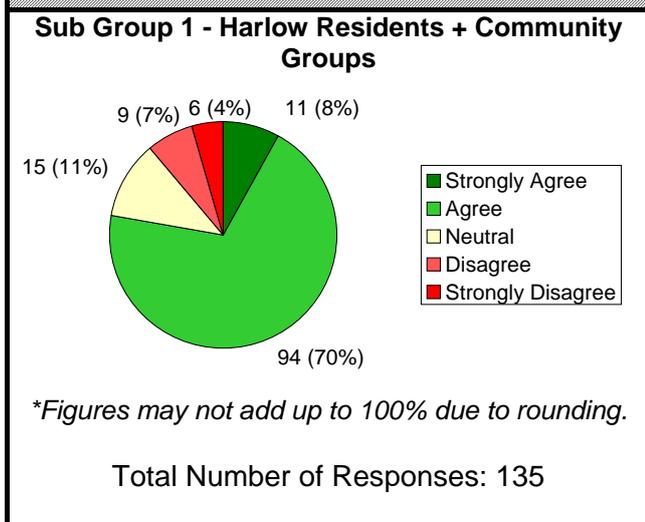
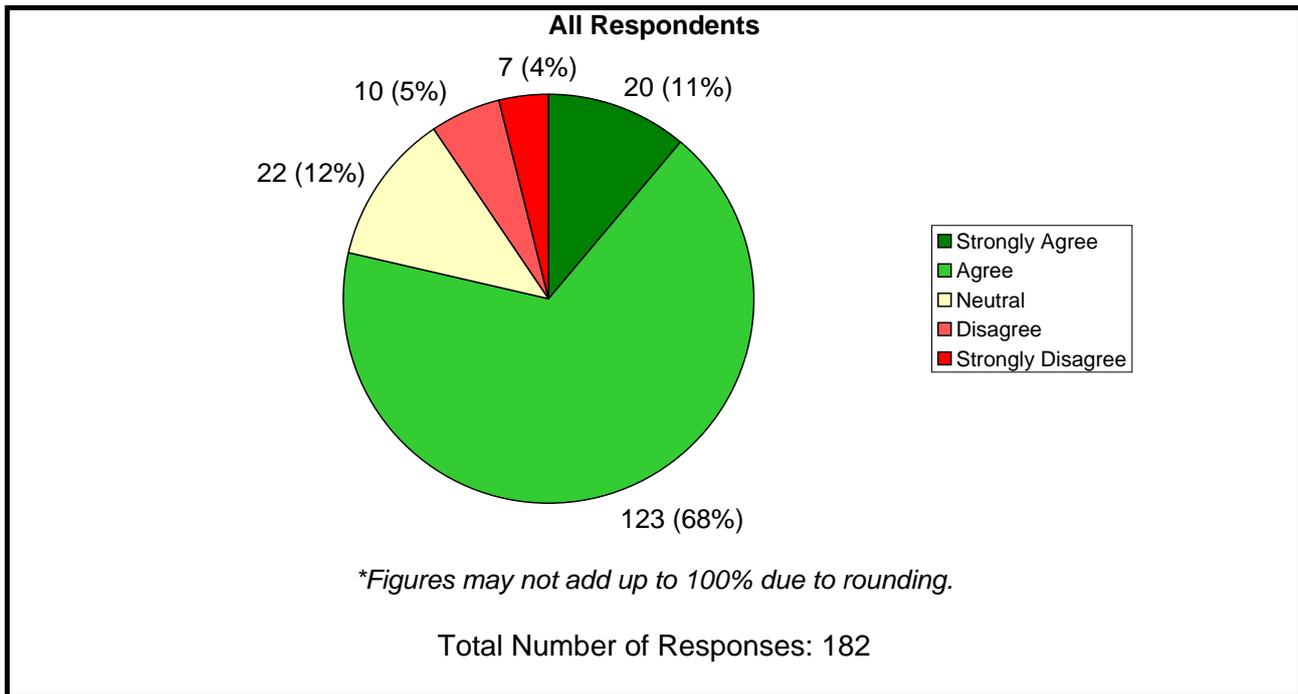
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 12 - If you disagree/strongly disagree. What changes would you make to the policy areas?

There were a number of suggested amendments to the policy areas. The key suggestions are as follows:

- Rewrite policy to protect the role and function of green wedges
- Rewrite policy to acknowledge and build upon the design principles established by Gibberd in securing sustainable development
- Add policy for town centre development
- Rewrite policy to ensure infrastructure provisions precede house completions
- Rewrite policy to ensure new housing development caters for local need and provides housing of such standards that would appeal to those who choose to work in Harlow but live elsewhere.
- Omit policy on minimum density standards
- Housing should cater for local housing needs.
- Need policy dealing with low carbon/climate change.
- Updated evidence is needed to support retail policies particularly the definition of primary and secondary frontages.
- Include employment minimum requirements / targets in town centre regeneration.
- Strengthen policies concerning health provision.
- Policy areas need to deal with the scope for a Green Belt review, the potential to release Greenfield land for housing, where insufficient previously developed land exists; and direction on how cross boundary growth options could be coordinated. These options need to be tested in the public domain.
- Reference to inclusive access
- Policy areas should be better grouped under the appropriate themes, particularly those relating to the development of the town centre.
- Consideration should be given to policies relating to the urban fringe.
- Policy framework needs to consider the future role, scope and function of the existing and future neighbourhood centres and hatches and the town centre in Harlow.
- Core Strategy should provide appropriate strategic policies that continue to promote and facilitate future economic growth within the health sector.

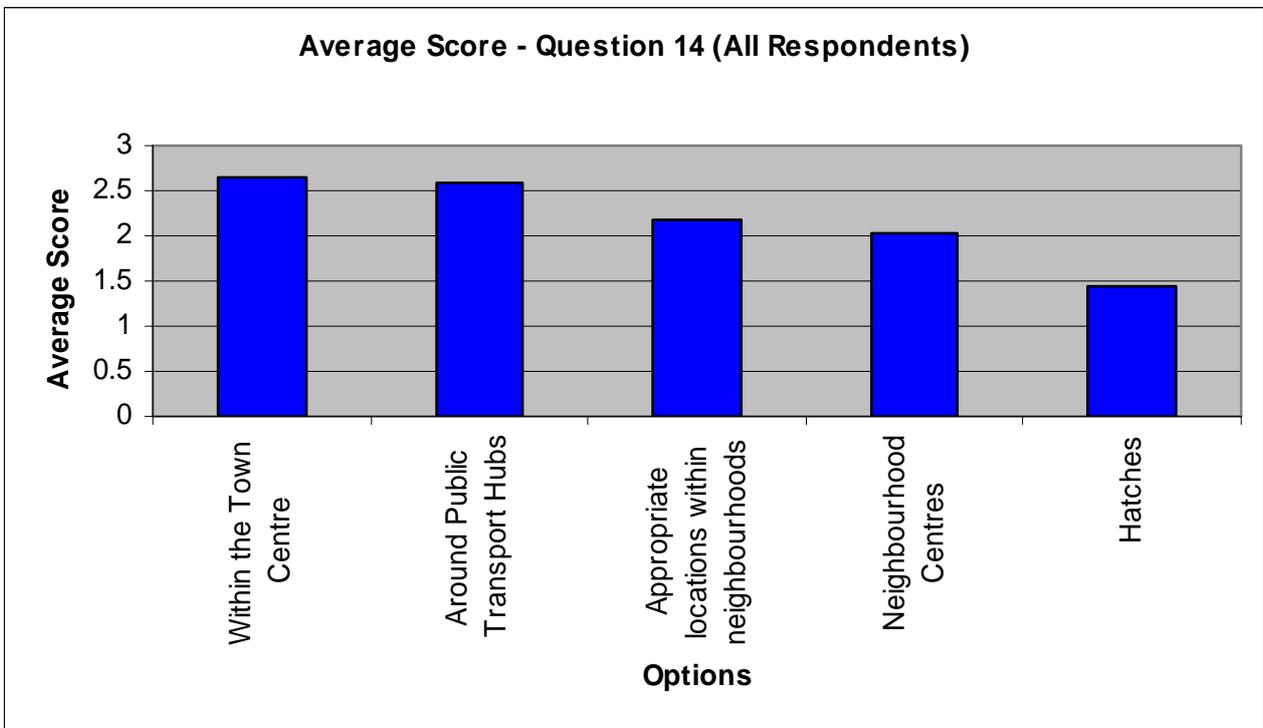
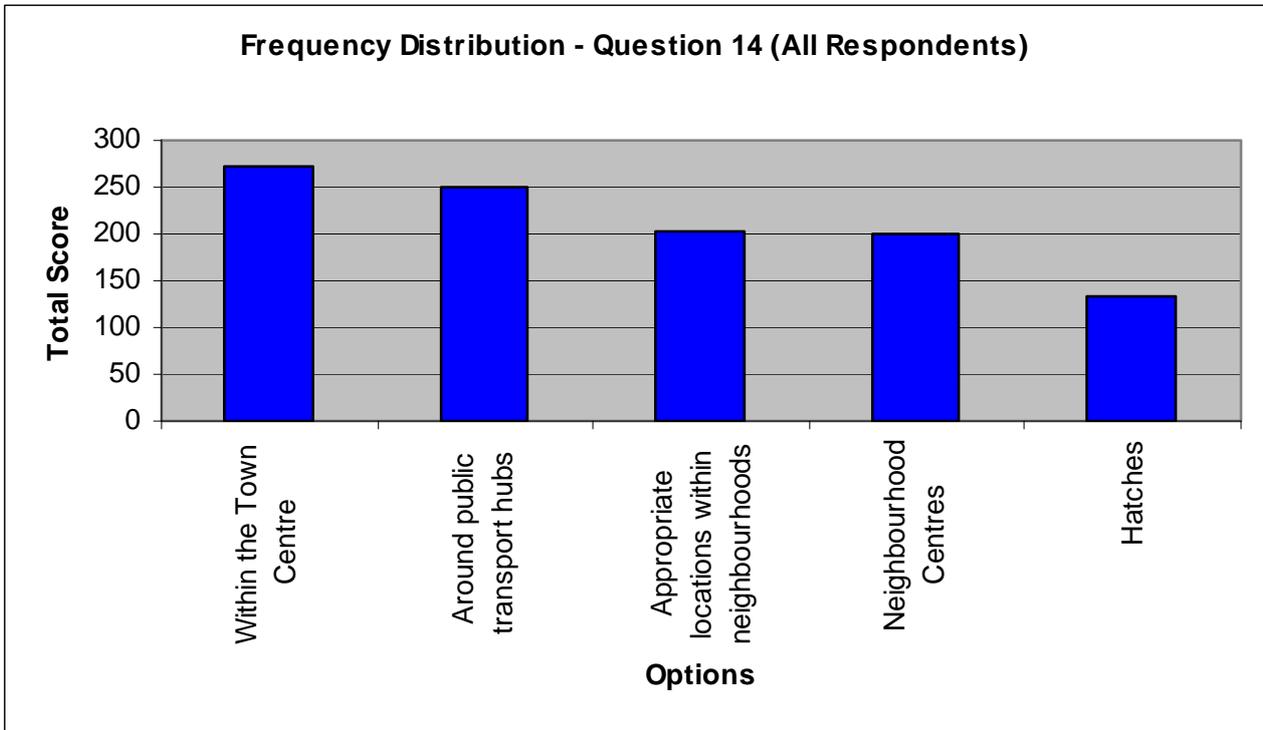
Question 13 - Do you agree that new development should be directed to areas that will maximise regeneration of the town?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

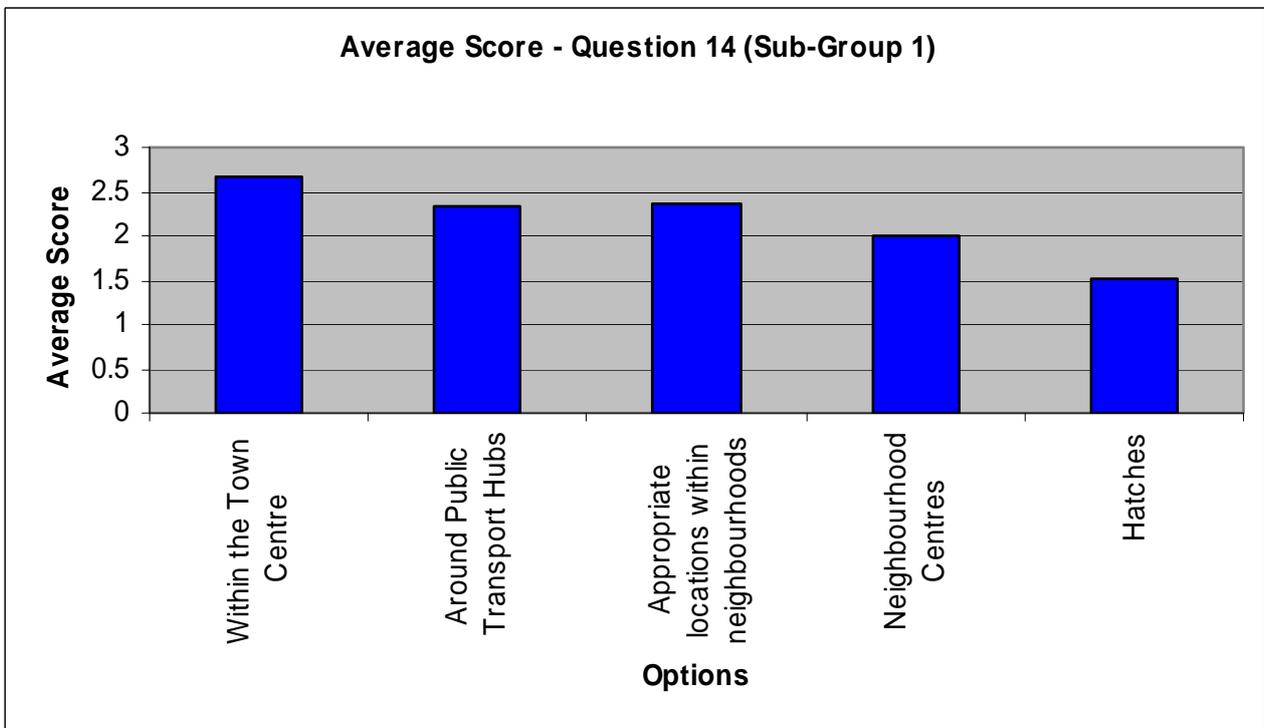
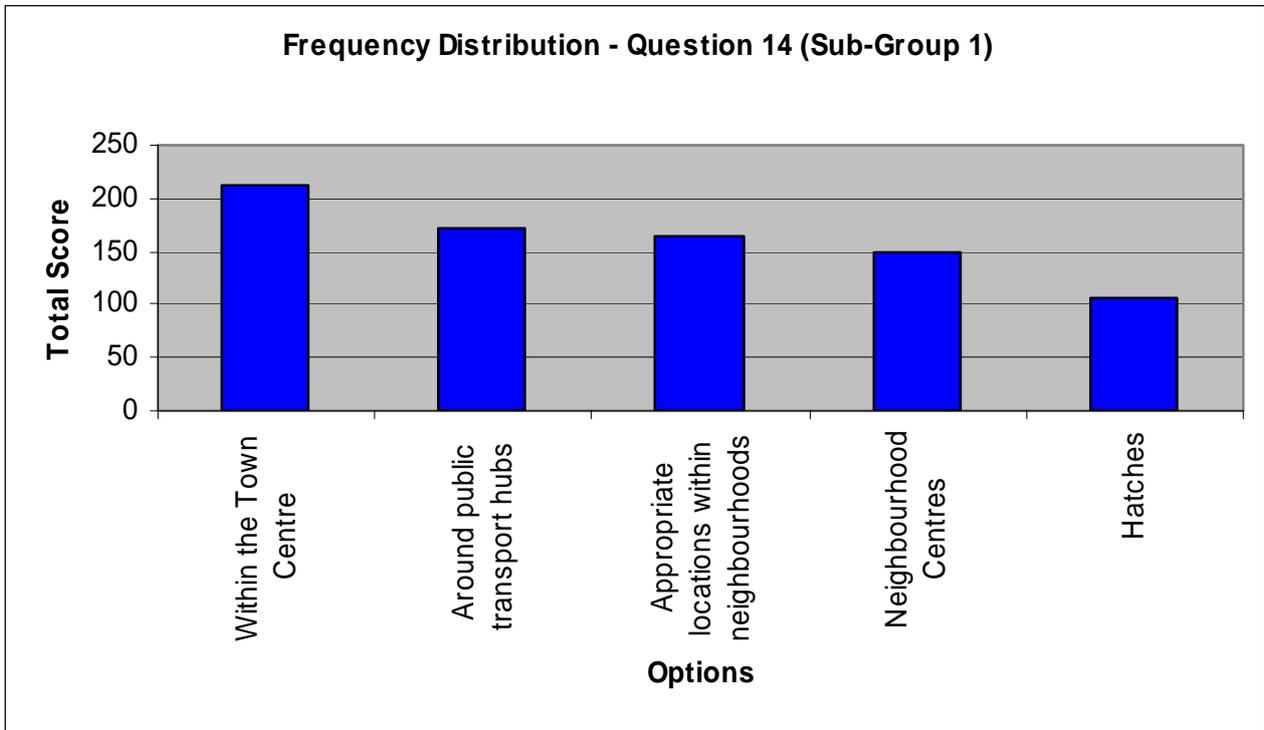
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

All Respondents



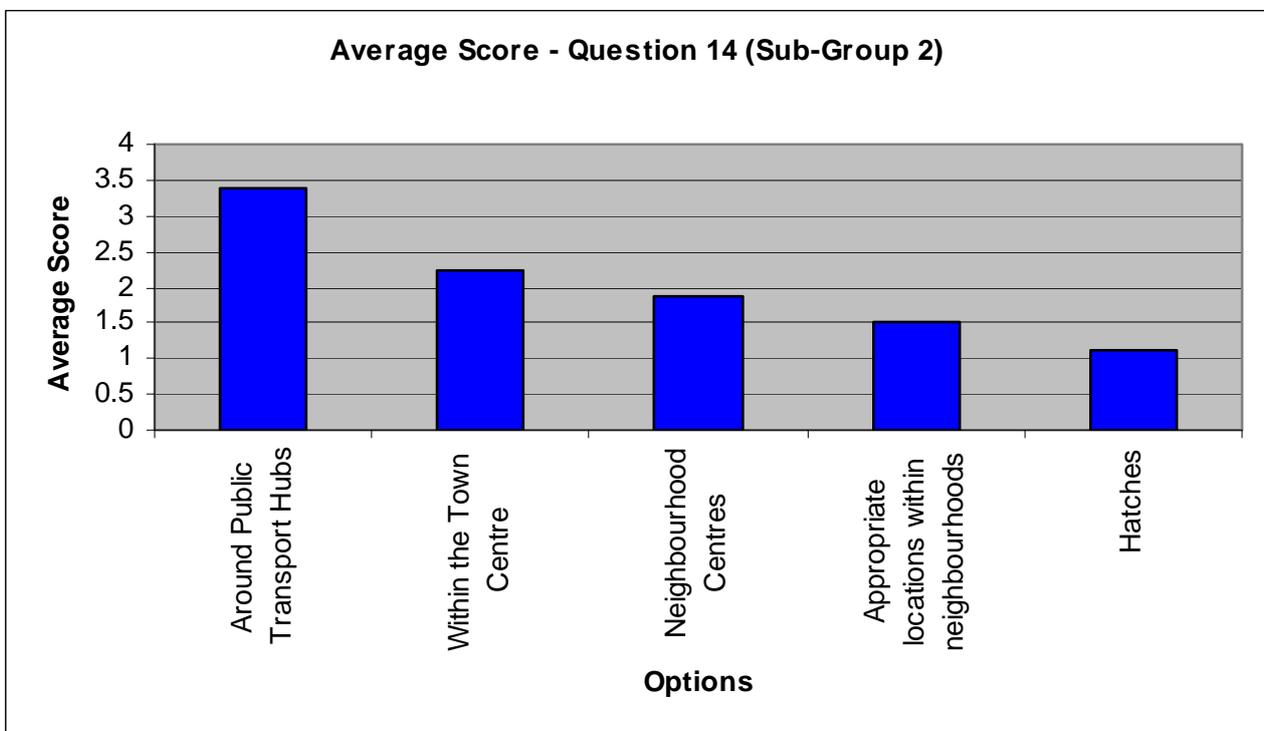
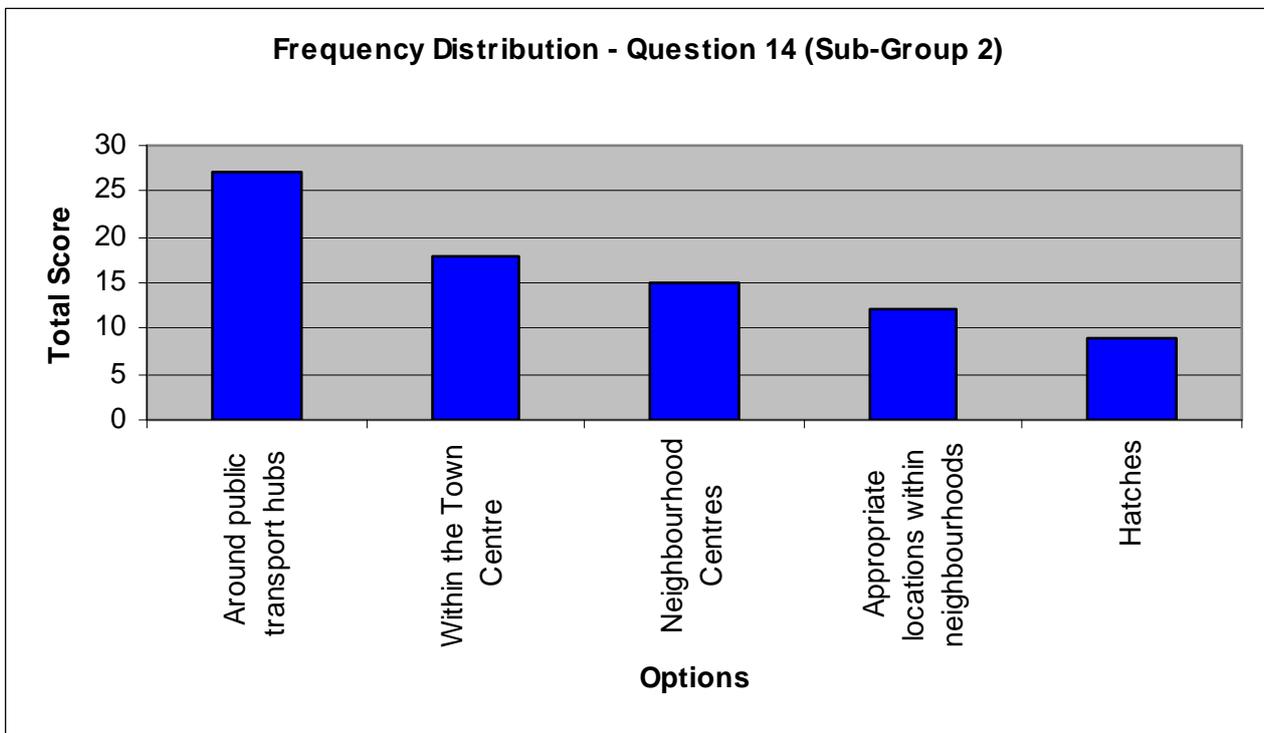
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

Sub-Group 1 – Harlow Residents + Community Groups



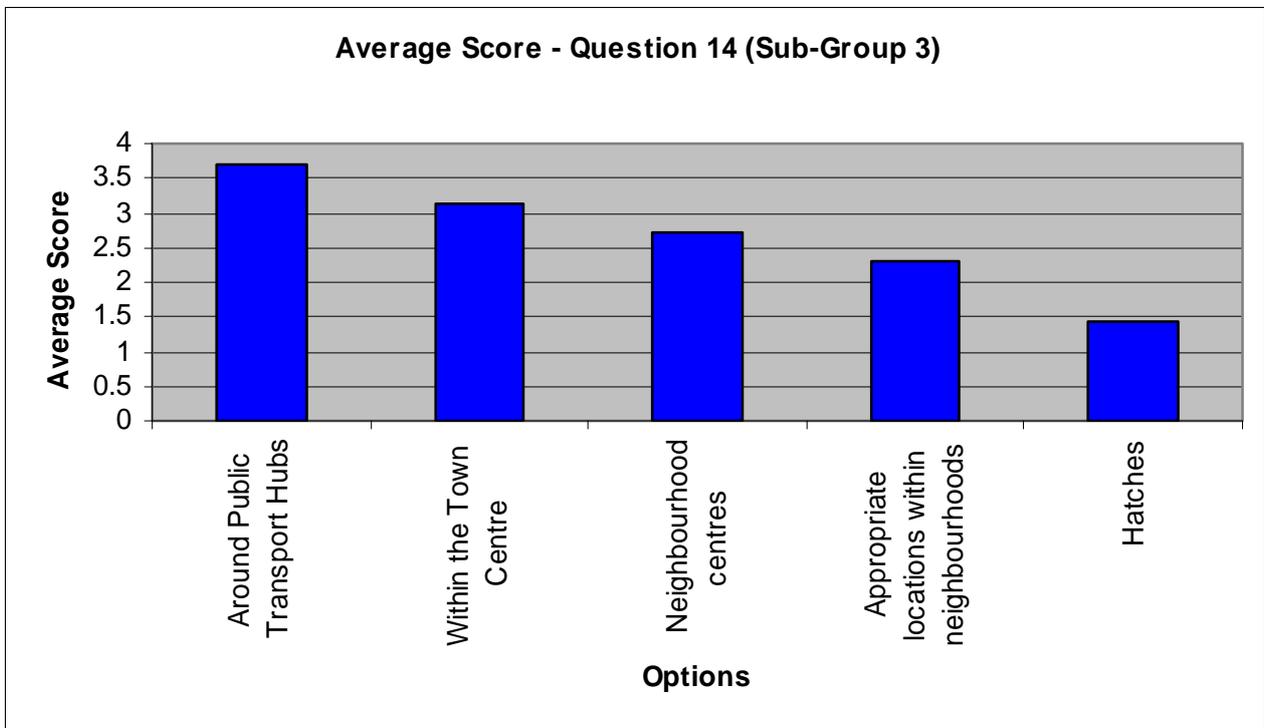
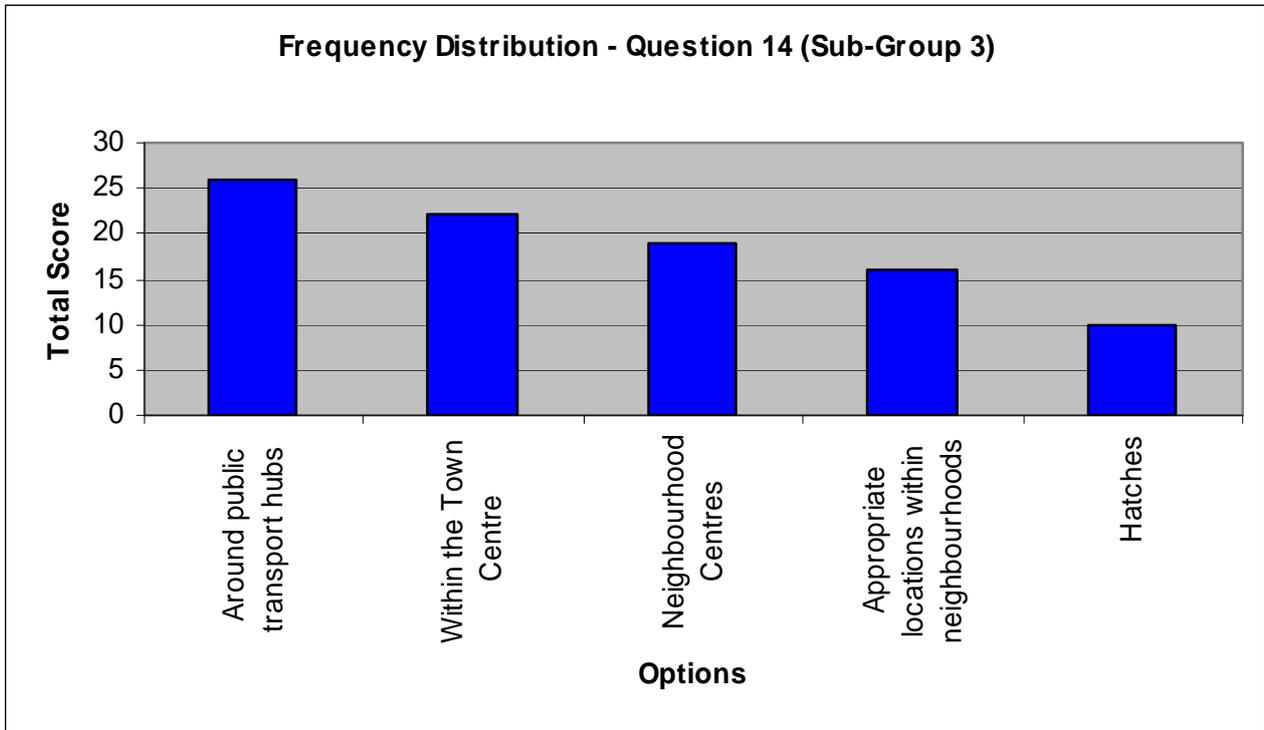
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

Sub-Group 2 – Statutory Consultees + Local Groups and Organisations



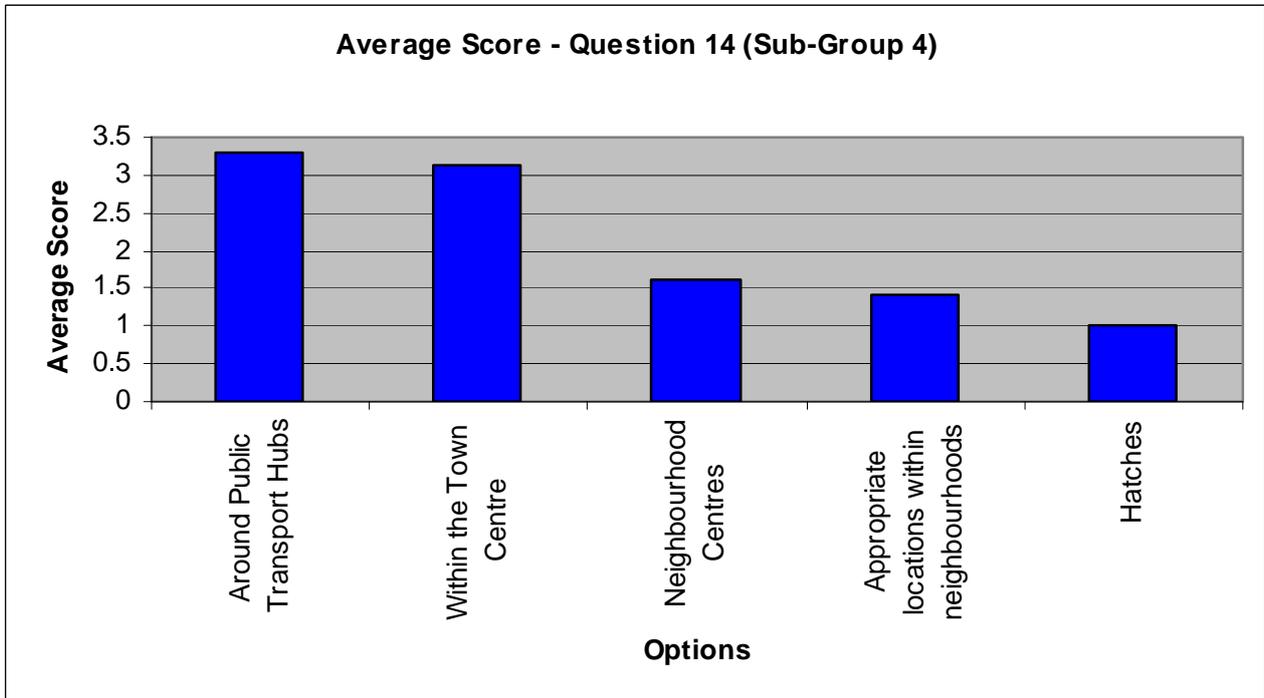
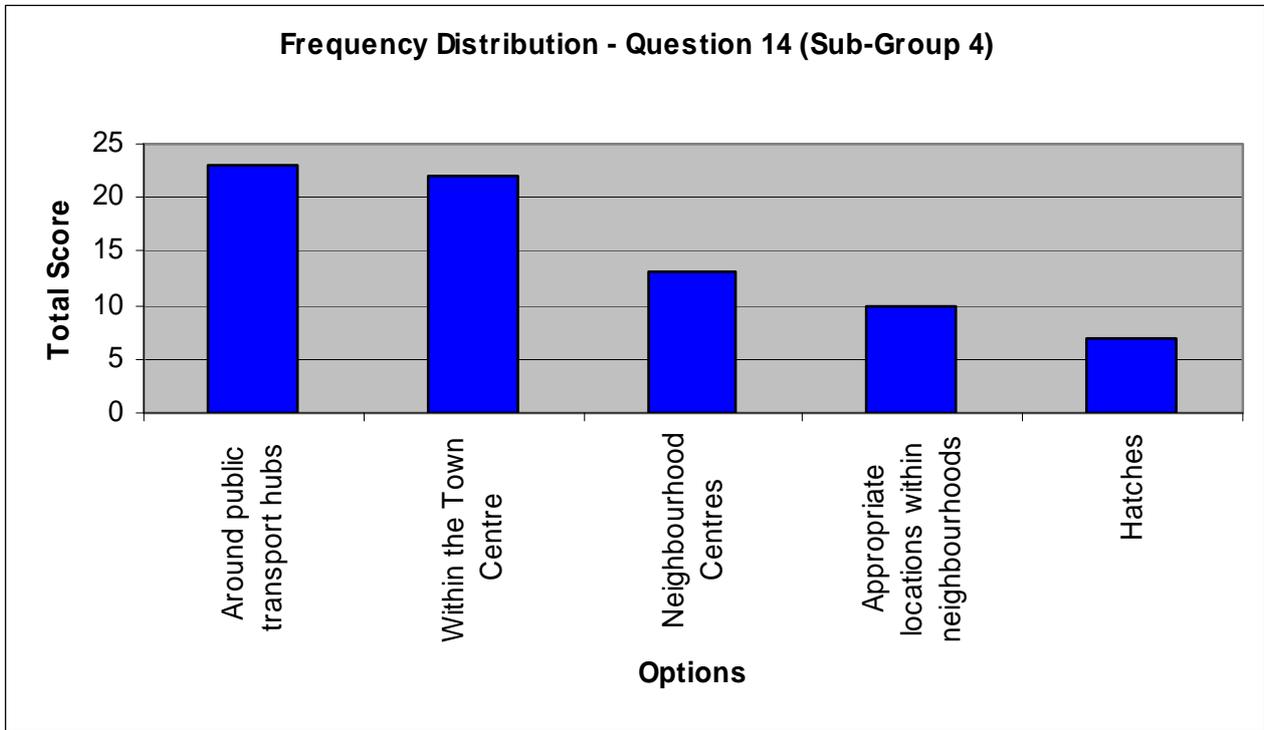
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

Sub-Group 3 – Adjoining Parishes Residents + Other Residents

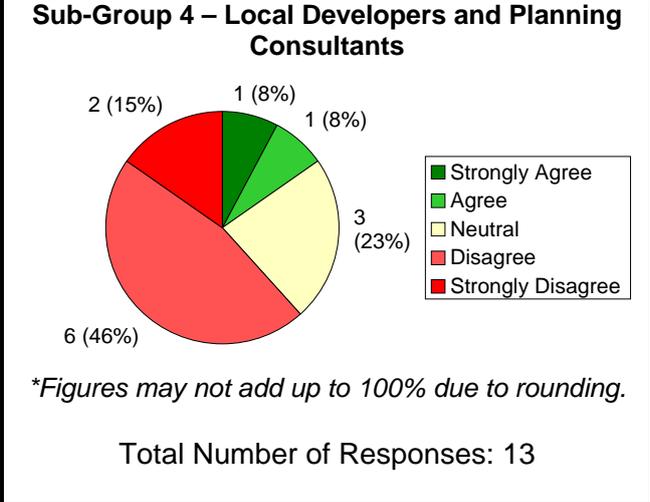
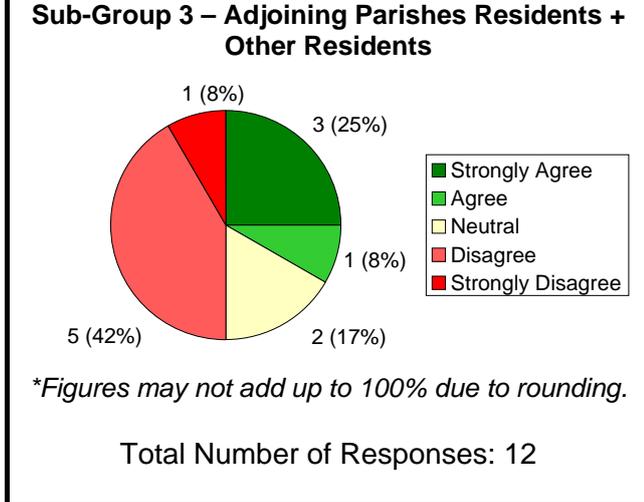
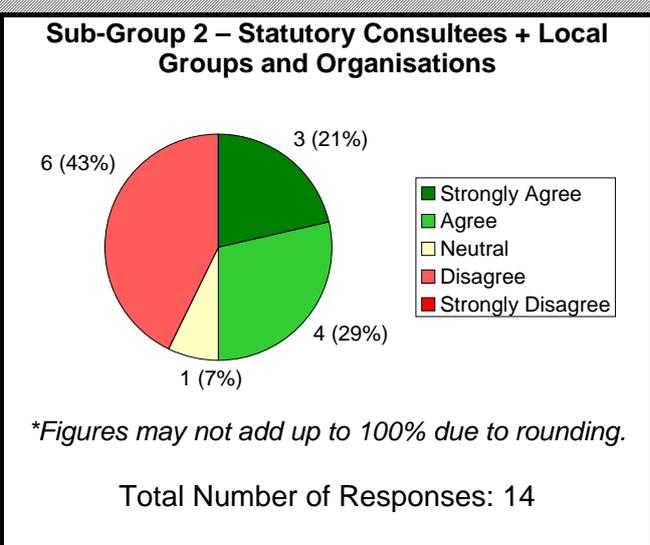
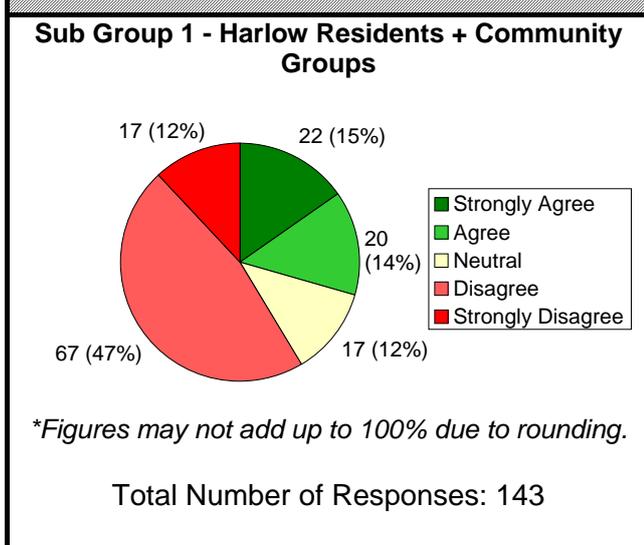
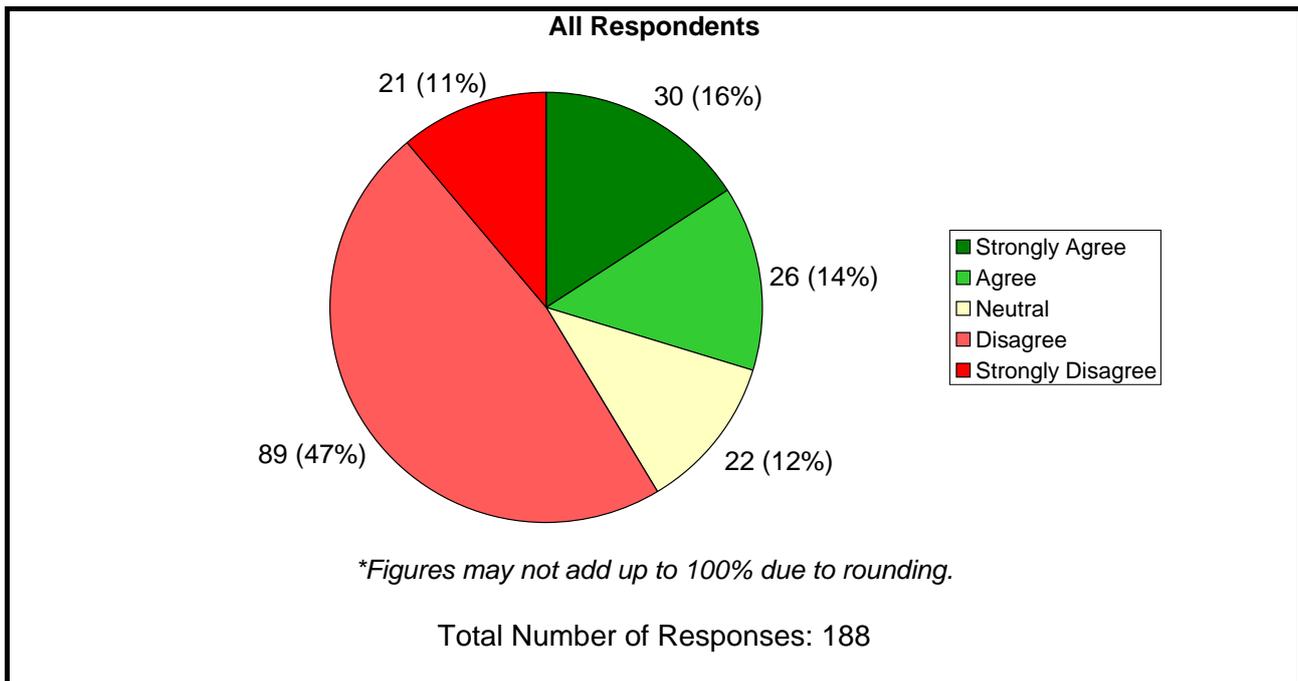


Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

Sub-Group 4 – Local Developers + Planning Consultants/Agents



Question 15 - Should the Council consider underused open spaces and other undeveloped land for development before considering releasing land in the Green Belt?



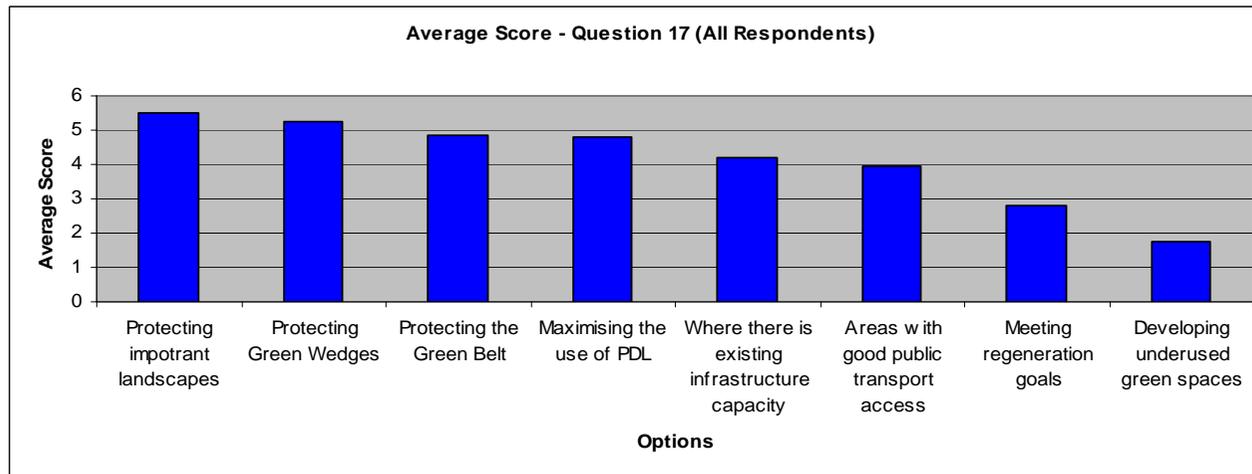
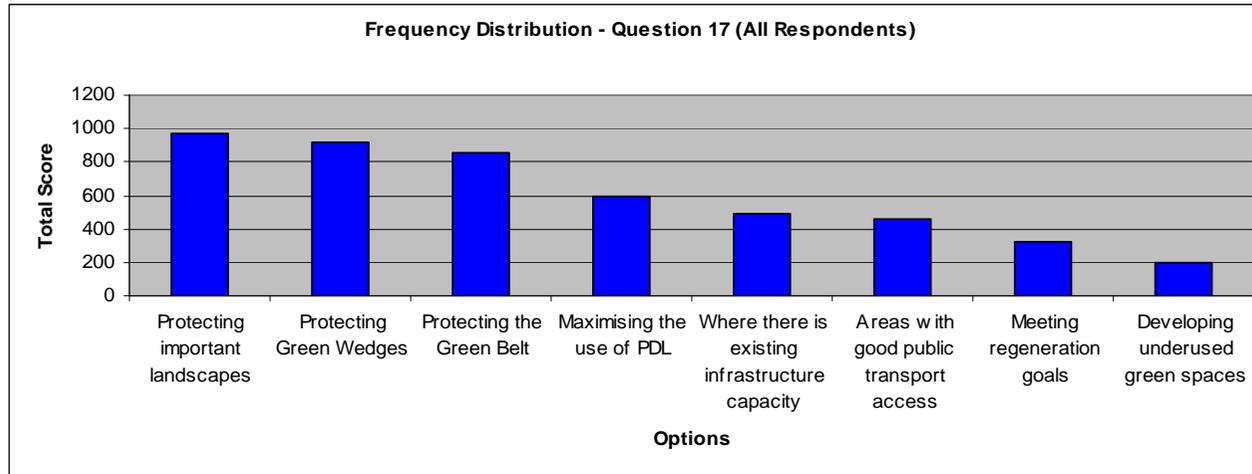
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 16 - The Green Wedges have performed a variety of roles in shaping Harlow. Should the roles of Green Wedges be reviewed to meet future development needs in the Harlow area?

- No – no details (40)
- Yes – no details (11)
- Green Wedges should not be developed on (70)
- Green Wedges are fundamental to Harlow’s character (51)
- Green Wedges should be reviewed, but only to be strengthened/ improved / enhanced (12)
- Green Wedges should be reviewed, but only to widen roads to ease traffic congestion (2)
- Green Wedges perform an important flood protection role (16)
- Green Wedges perform important recreational, health/ quality of life and movement functions (17)
- Access to Green Wedges should be improved (18)
- This sets a dangerous precedent – could lead to loss of all Green Wedges (2)
- Better to build on Green Wedges than build on the Green Belt and destroy countryside around Harlow. (4)
- Better to build on Green Belt than destroy Green Wedges. (1)
- Yes but only in order to build things that benefit neighbourhoods, e.g. schools, leisure facilities, retail facilities. (3)
- Yes, but only if open spaces are of poor quality / use (2)
- Green Wedges should only be developed as a last resort / only if absolutely necessary (3)
- Review of Green Wedges should consider where new Green Wedges are required to serve new urban extensions. (4)
- Development could take place on Green Wedges to enable regeneration of Harlow, if land swaps could re-provide Green Wedges elsewhere (1)
- Why should Harlow residents trust the Council to carry out this review correctly? (1)
- Consideration needs to be given to how they interface with developed areas, which often face away from them. (1)

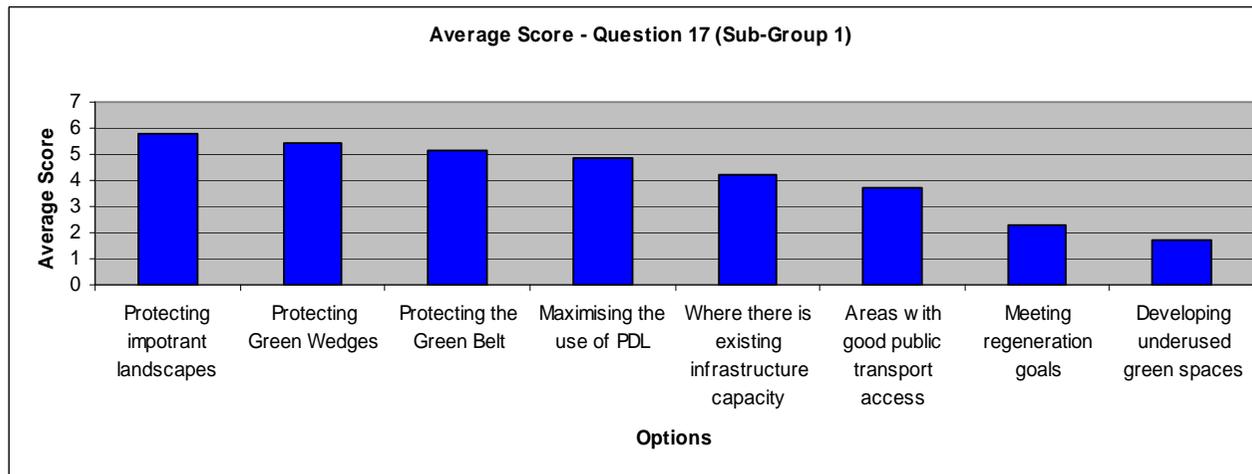
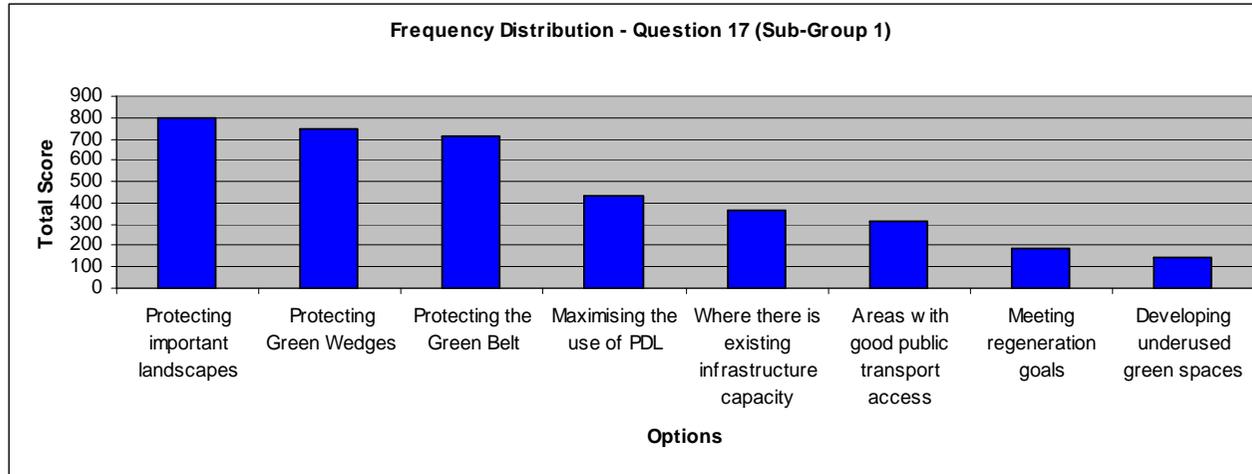
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

All Respondents



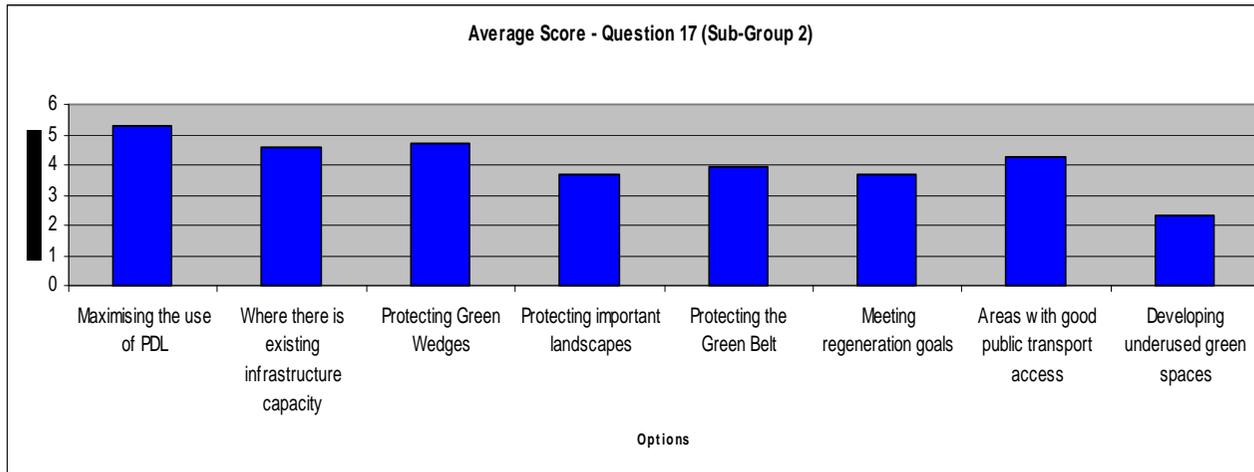
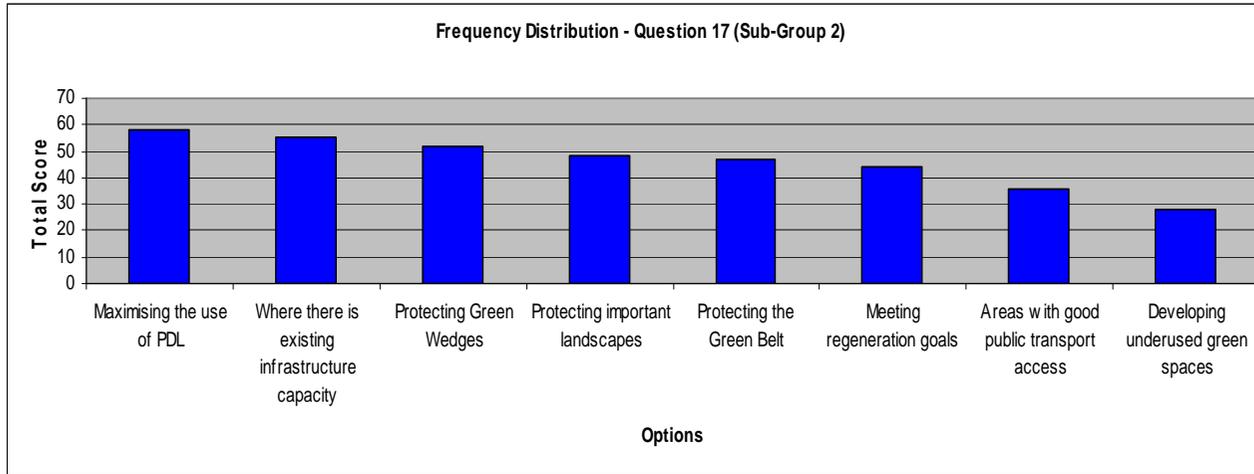
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

Sub-Group 1 – Harlow Residents + Community Groups



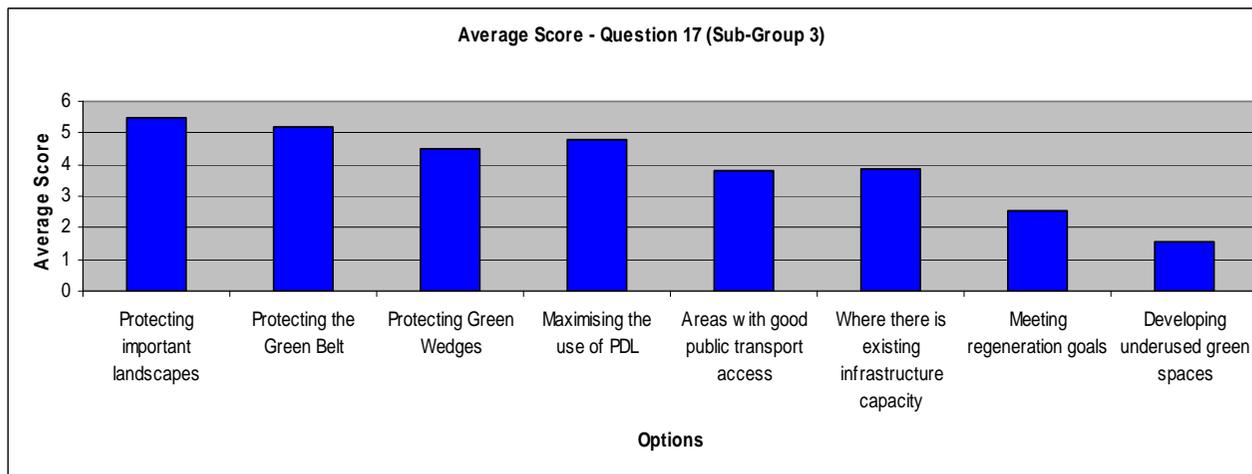
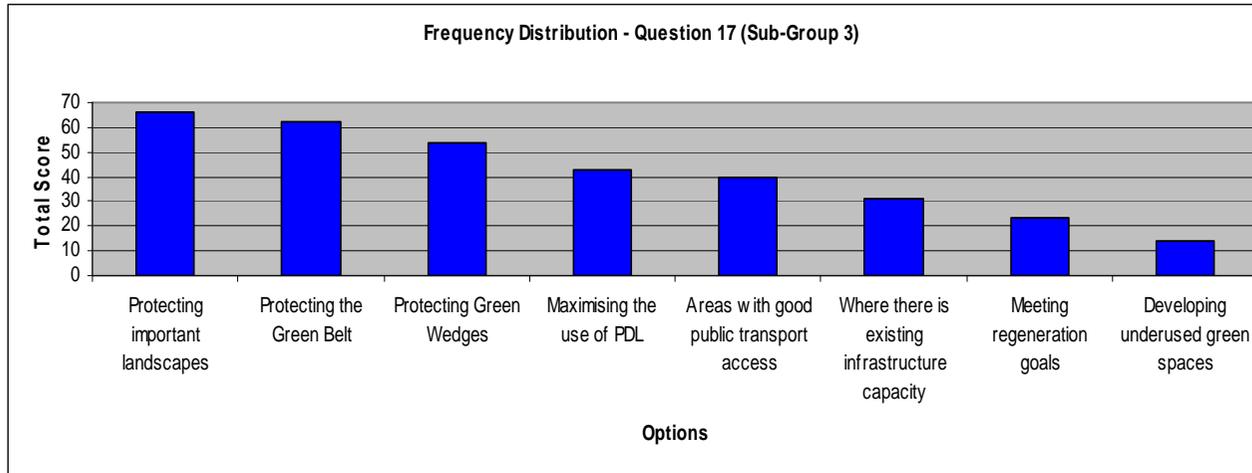
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

Sub-Group 2 – Statutory Consultees + Local Groups and Organisations



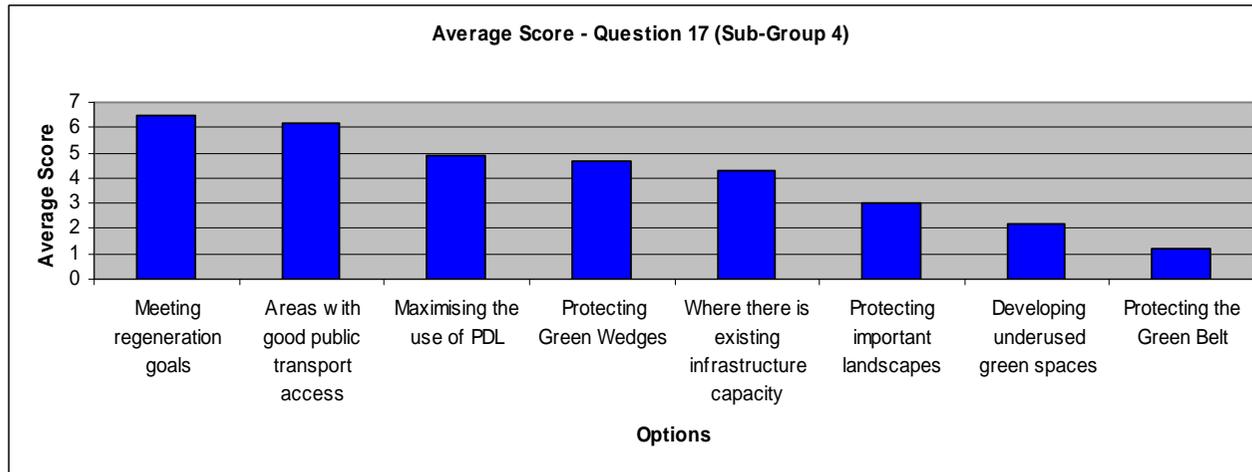
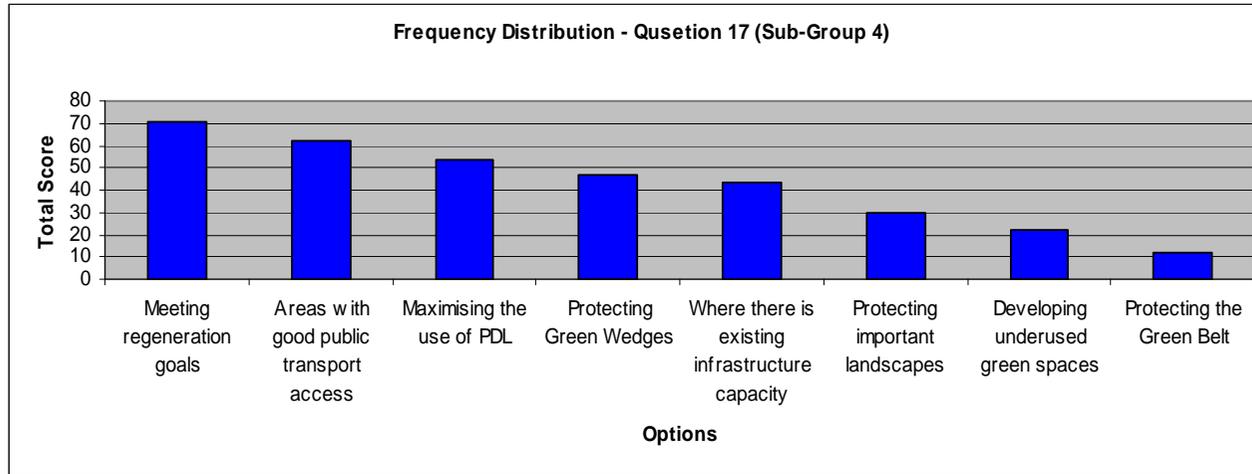
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Sub-Group 3 – Adjoining Parishes Residents + Other Residents

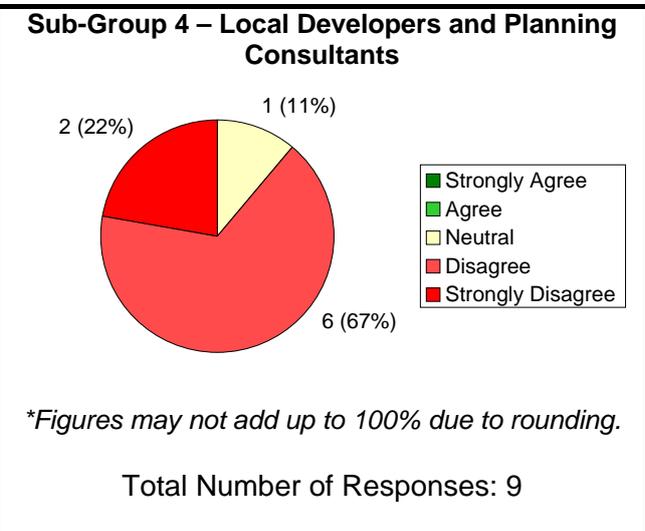
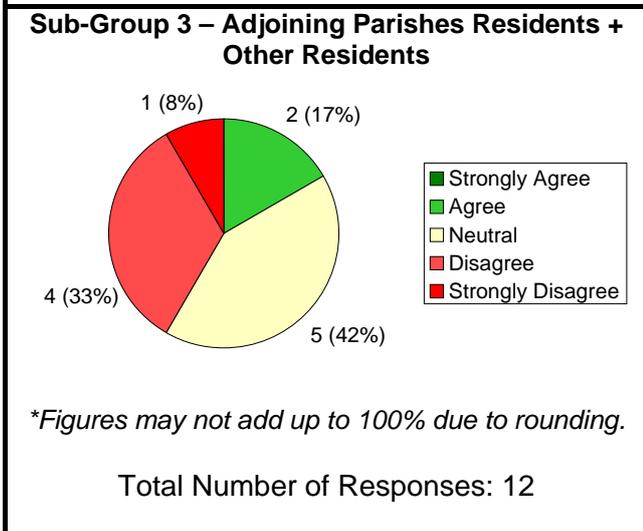
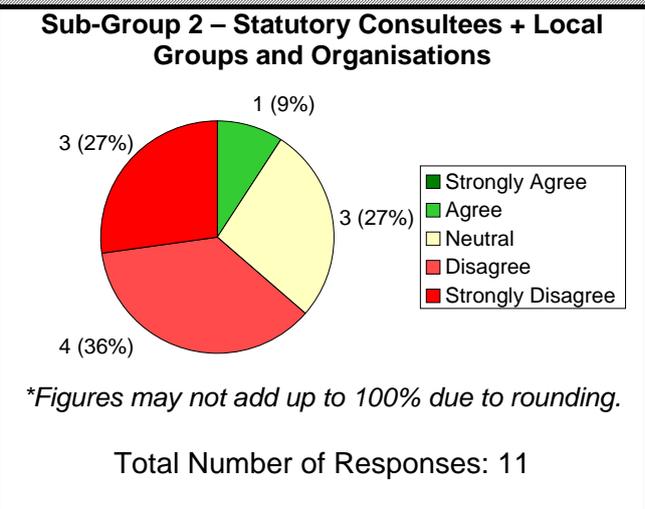
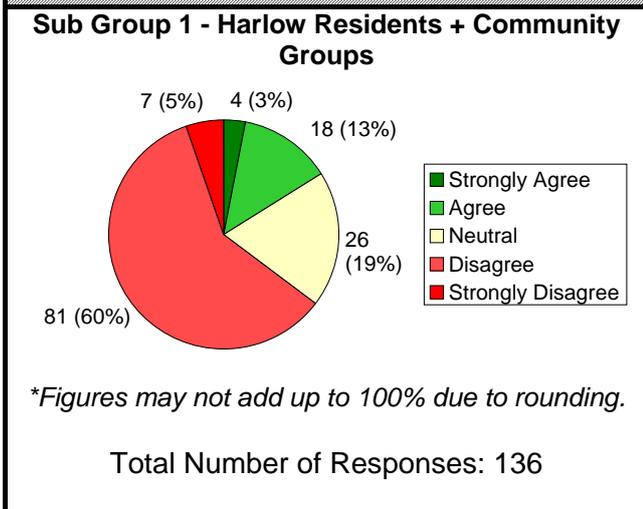
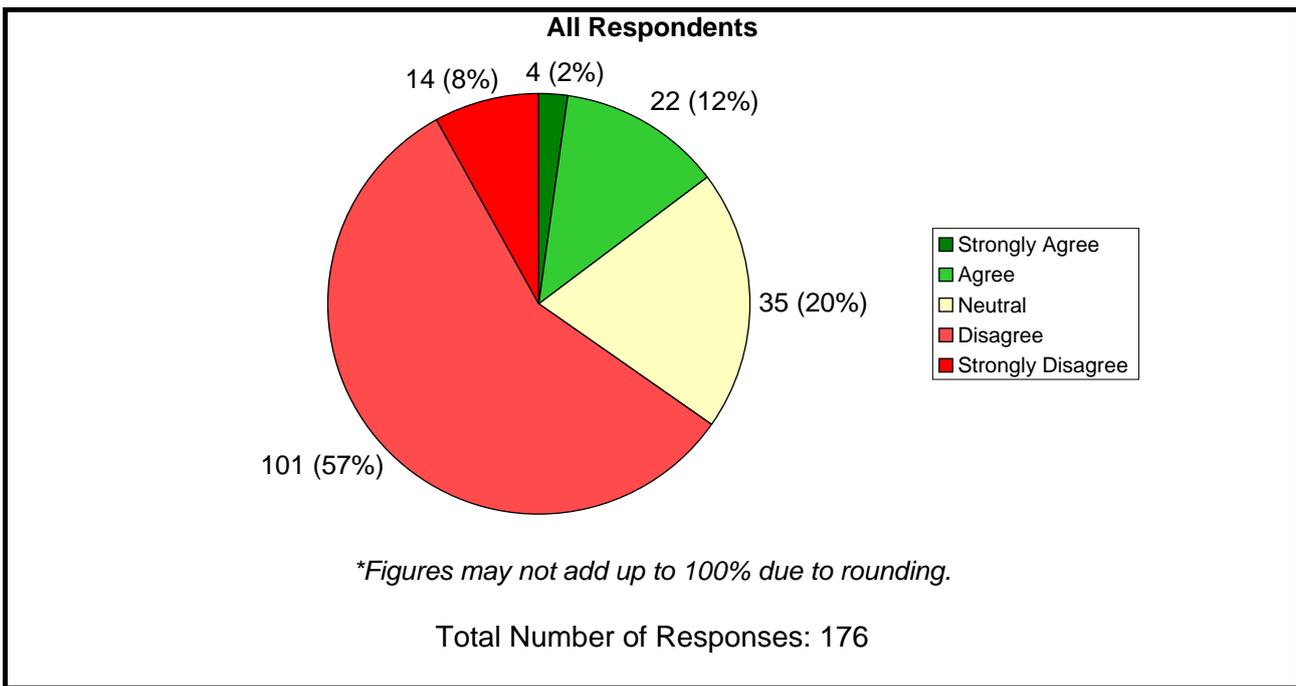


Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

Sub-Group 4 – Local Developers + Planning Consultants/Agents



Question 18 - Do the existing employment areas meet current and future employment needs?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 19 - If you disagree/strongly disagree, please explain what changes you think should be made to Harlow's employment areas?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- No / small changes
 - Templefields and The Pinnacles provide sufficient employment opportunities for the town and the wider sub-region.
 - Parts of some existing employment areas may be suitable for other purposes however it is vital to retain the bulk of employment land in its existing locations.
 - Protect employment areas from inappropriate development like housing.
- Just consolidation
 - Templefields and The Pinnacles should remain as the town's principal employment clusters. However clear opportunities exist for consolidation as much of the space in these areas is vacant which could provide space for employment growth and for consolidation from other areas.
 - Consideration must be given as to whether employment land is in the right location and if the town's broader regeneration objectives could be achieved through the release of some existing land for other purposes.
- Review their role / location
 - The role and function of current employment sites should be reviewed to ensure the Council's regeneration and economic development goals are achieved. This should include consideration of the connectivity of the strategic road network and congestion from local employment sites.
- Redevelop / regenerate them
 - Employment areas should be re-developed.
 - Some existing buildings need to be revamped.
 - Existing employment areas need regenerating.
 - Industrial areas need to be redeveloped.
 - Harlow's employment areas should be redeveloped as they were built in the 1950s/60s and are no longer fit for the needs of the 21st century.
- More investment
 - Some employment areas need investment to meet present requirements.
 - The quality of employment land should be improved.
 - Improve linkages between employment areas and the Town Centre.
 - Make employment areas more flexible.
 - A new M11 junction would provide an opportunity to deliver a high quality employment / commercial development as part of a new northern gateway to the town.
 - Templefields has outdated spaces needing modernisation to attract new business, and infrastructure constraints need to be addressed with the creation of a new road link from River Way to the Sawbridgeworth Road.
 - The expansion of Pinnacles should be examined further as the key employment area located closest to the Town Centre, There is a need to create high-value jobs by delivering appropriate business infrastructure and nearby links between employment sites and housing.

- New infrastructure is required to improve access to the existing employment areas to the north and west of the town.
- The immediate constraint on all traffic movements into and out of Harlow (including commercial traffic) is the limited capacity of M11 Junction 7. The first priority should be early implementation of proposals to upgrade and remove capacity constraints at this junction. In the longer term, a partial or complete southern bypass is the best solution to Harlow's highway capacity problems and to the problem of access to existing and proposed employment areas south and west of the town.
- Improve the public realm in The Pinnacles to attract inward investors
- Integrate housing and employment sites to reduce car use
 - Housing and employment areas should be integrated to reduce car use and integrate communities.
- Use some employ areas for housing
 - Fringe areas of employment land may be better suited for residential use.
 - Convert disused employment areas for low-cost housing.
- Encourage more small work units
 - Encourage more small work units in Edinburgh Way.
 - Create employment opportunities in non-employment areas and small home-based work/work units in residential areas.
 - Too much emphasis on warehousing which creates few jobs and causes congestion problems. Create more SMEs and encourage home working.
- Employment areas should be for Harlow people
 - Employment areas should provide jobs for Harlow people.
 - Existing employment areas should provide jobs for Harlow people.
 - Create employment opportunities which meet the skills of local people.
- Need to attract more professionals to Harlow
 - Provide employment opportunities that will encourage professionals to come to Harlow.
 - Encourage qualified people to work in Harlow.
- Need to attract more manufacturing to Harlow
 - Encourage more manufacturing firms to locate in Harlow to improve the local economy and assist in regeneration.
- Traffic congestion is a problem
 - Better transport infrastructure required to serve employment areas.
 - Tackle traffic congestion in The Pinnacles.
- Improve public transport to employment sites
 - Improve public transport links to Edinburgh Way and The Pinnacles.
 - Better access to public transport.
 - Improve public transport links to The Pinnacles.
 - Improve public transport links to Edinburgh Way and The Pinnacles.
- More leisure and recreation facilities in employment sites

- Staple Tye
 - The industrial area at Staple Tye, including Lister House Health Centre, the low grade retail mews and Council depot should be identified as a regeneration area with the potential to bring forward a mixed use development that could support a range of new residential development and enhance the neighbourhood centre. Furthermore some of the larger industrial units at Staple Tye could be relocated to The Pinnacles or Edinburgh Way although some small, high quality business starter units could be developed to retain some employment function at Staple Tye but in a way that is more sympathetic to the surrounding area. Staple Tye should be identified as a regeneration and growth area and earmarked for an Area Action Plan within the LDF.

- New high tech site
 - A new high technology business site should be allocated in any new large urban extension to attract growth sector 'knowledge industry' jobs.

- New areas in South close to J7 M11
 - Designate some employment areas on the south side of the town close to Junction 7 of the M11.
 - Future employment/industrial development should have direct access to the M11 so related traffic does not have to pass through the town.
 - Consideration should be given to land at Harlow Park Nursery as a strategic employment location with good access to the M11.
 - Employment sites should be located closer to the strategic road network.

- New areas in West / South West (not Roydon)
 - New employment areas should be focussed in the west and south west of the town but away from Roydon.

- New areas in North east
 - Moderate employment development should be allowed in north-east of the town.

- New areas to east of M11
 - Harlow should be expanded to the east beyond the M11 with employment land being part of that expansion.

- New areas in east / south east
 - More employment land should be allocated on the east and south east of the town which have good motorway links.

- Extend Pinnacles
 - New employment areas should be designated including extensions to The Pinnacles to make up for these losses.
 - The Pinnacles should not be extended as it would have an adverse impact on Roydon Village.

- Urban extensions
 - Need to consider employment land provision within any urban extensions

Question 20 - How do you think Harlow Council should shape future shopping development within the town?

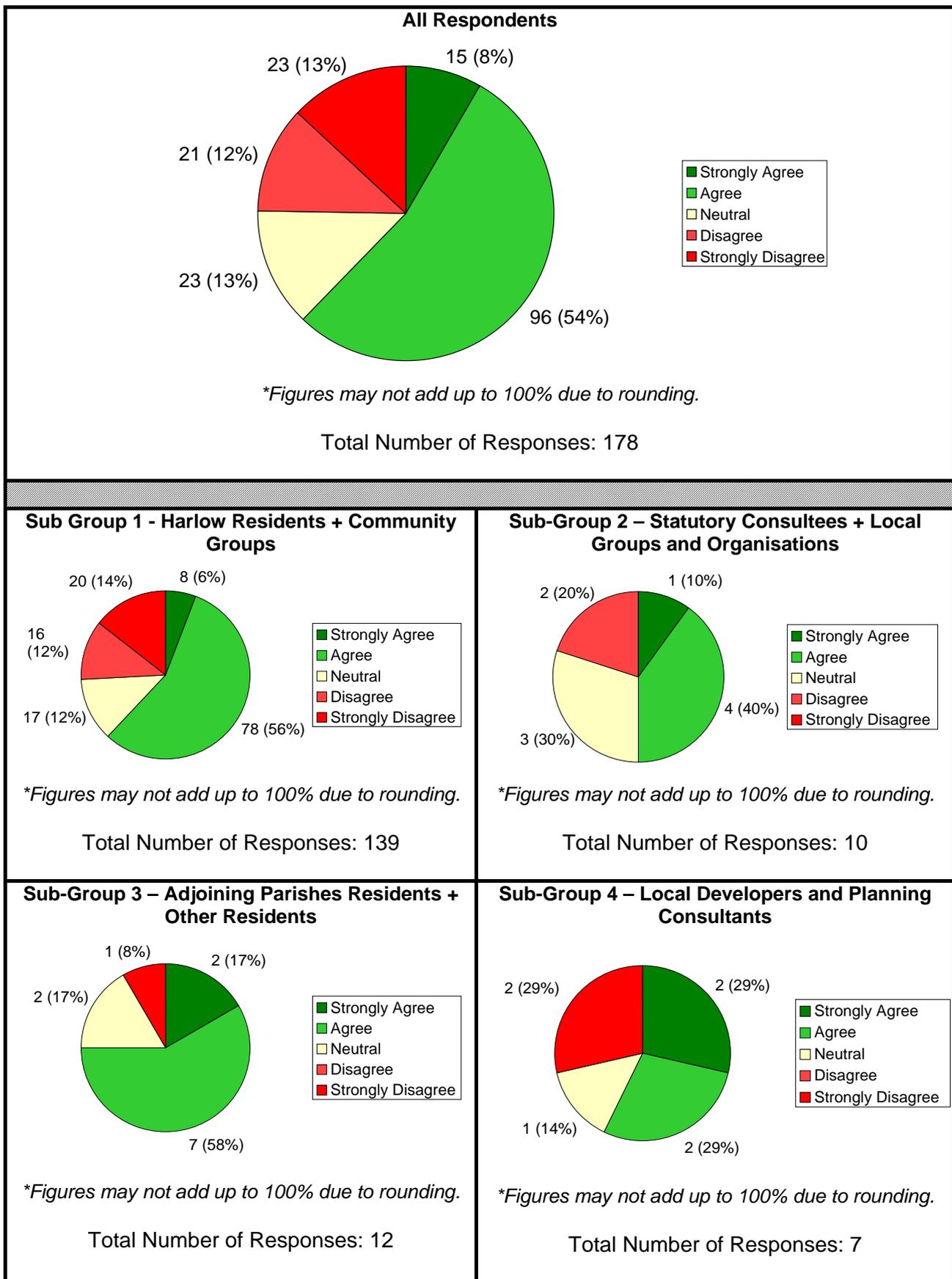
Set out below is a summary of the key issues raised by respondents in relation to this question:

- Retail development should be encouraged to locate in the town centre
- Develop the area around the Odeon
- Refurbish town centre
- Edinburgh Way retail is inaccessible to those without cars
- No more retail in Edinburgh Way
- Additional quality shops – food and clothing
- Better shopping environment
- General shops in hatches, mixed shopping in neighbourhood centres
- More shops in Town Centre
- Provide a link between Queensgate and Harlow Retail Park (Homebase, Argos etc)
- Department Store in Town Centre
- Lower rents/rates in shops
- Cheaper car parking
- Difficult to find your way around to key retailers
- Fewer fast food outlets and restaurants
- More independent outlets
- Better pedestrian links between retail areas, including bridges and crossings
- Distribute shopping to neighbourhood centres
- No more shops in Town Centre
- Reshape shopping areas to uniquely reflect Harlow, not like other shopping centres
- Regenerate all shopping areas
- Regenerate market area
- Harlow should not become a regional shopping centre
- Redevelop northern Town Centre should be a priority
- Reverse the trend of “Retail Parks” offer free parking in Town Centre
- Empty shops should have alternative uses
- Cinema should be brought back into use, as public hall
- Promote night time economy
- Potential in the existing architecture of northern town centre.
- A vibrant enclosed market in a permanent building
- Traffic congestion affects shopping, do not increase floorspace until this is resolved
- Sheltered links between shops
- A mixture of shops and housing to provide a more vibrant centre
- Study the needs of the local community and which shops should be provided to draw people in.
- Competition from the Westfield Stratford shopping Centre
- Move bus station to the north side of Market Sq. Develop bus station for a Department Store
- General environmental maintenance
- Major retail centre in north east Harlow would support new M11 junction and northern by pass.

- Need for another large supermarket is debateable
- Better consultation of land owners over redevelopment plans
- Reconsider Primary frontage policy as a tool to promote vitality and viability
- The Strategy is appropriate for the town as a sub-regional centre, and in terms of protecting neighbourhood centres and hatches.
- Existing shopping hierarchy should be maintained
- Densification of mixed uses is supported at neighbourhood centres and hatches
- Use growth agenda to accelerate redevelopment/regeneration of hatches
- Council should use compulsory purchase powers to facilitate redevelopment
- The Council should define options for the Town Centre and consult on them, this will enable the Council to choose a developer partner for redevelopment
- Town Centre SPD should not proceed in advance of the Core Strategy defined options for Town Centre development
- In this economic climate time should be allowed to prepare the “policy foundations” to assist in future interventions
- Options for Town Centre improvement could include
 - A greater or lesser extent of growth in retail floorspace
 - Extent of growth in supporting uses: including leisure and recreation, culture, employment and residential
 - Redevelopment confined to Local Plan boundaries or wider
 - Single developer partnership redeveloping comprehensively or a collective of individual landowners/developers
 - Phasing of redevelopment
- Uncertainty caused by revocation of East of England Plan extends to growth in retail expenditure and the scope to regenerate the Town Centre
- Core Strategy should be realistic in what can be achieved in short to medium term.
- Balance is needed in what can be achieved by a Town Centre Strategy
- Key drivers for Town Centre policy are the need to ensure realistic, viable and flexible proposals that are capable of implementation with a clear distinction between short, medium and long term plans.
- Comprehensive redevelopment of the Town Centre may not be appropriate at this stage, and should constitute an option at this stage.
- Include clear concise policy regarding retail centres in Harlow, whilst recognising an awareness of economic changes.
- Policy on the retail network should clarify the following:
 - How Harlow will accommodate identified need for growth in Town Centre use
 - How Harlow will accommodate identified need for growth in neighbourhood centres and hatches
 - How extension of Town Centre will be integrated into the existing uses and function
 - Actively work with neighbouring authorities to recognise Harlow's role as a sub-regional centre
- Provide a clear understanding how the shopping hierarchy will support major growth and contribute to regeneration and economic development.
- Economic growth should ensure that the quality of lives for deprived communities.
- Audit existing centres, for role, vitality, viability, and ability to incorporate new development.

- Consideration of alternative centres to accommodate new development, especially urban extensions
- Developing policy options with best access to Town Centre will assist the Council's aims.
- Harlow's Retail Market is characterised by:
 - Trade "leaks" to other retail centres
 - Decline in rental values and high vacancy rates
 - Primary catchment area less affluent than the secondary one
 - Retail offer is primarily value and mass, with few premium retailers
- New population in growth area will provide a an increase in retail expenditure capacity
- Retail in Harlow North would not compete with the Town Centre

Question 21 - What is your view on the Consultant's recommendations regarding Option A?



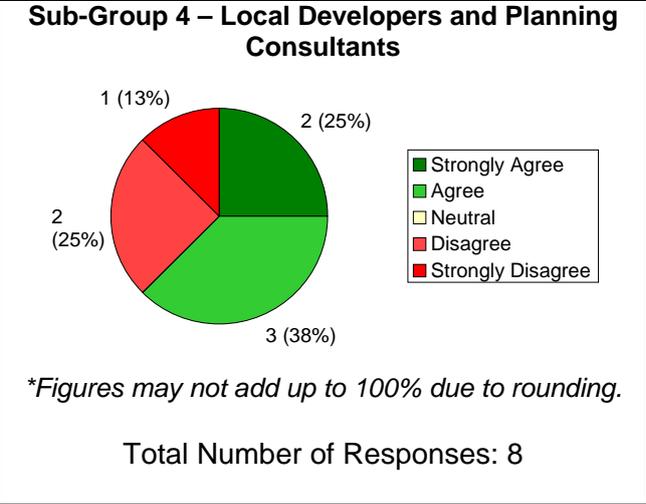
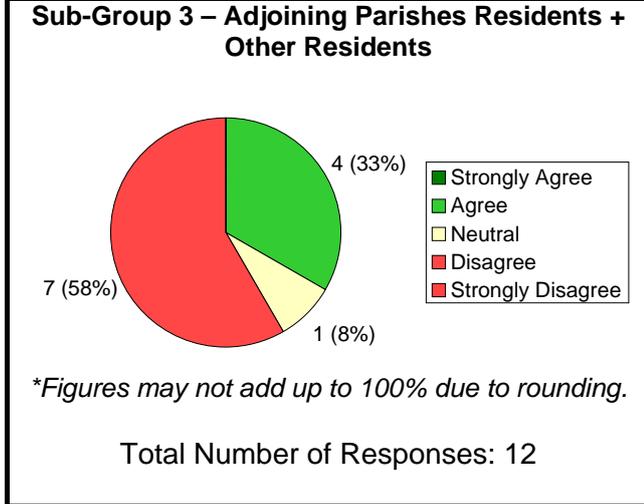
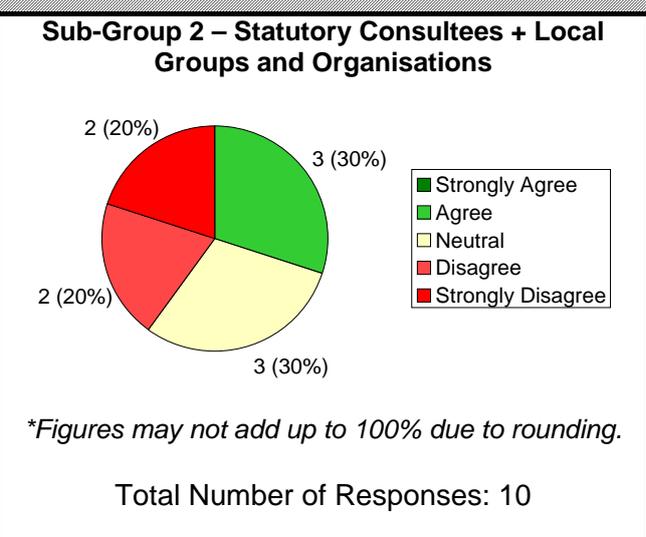
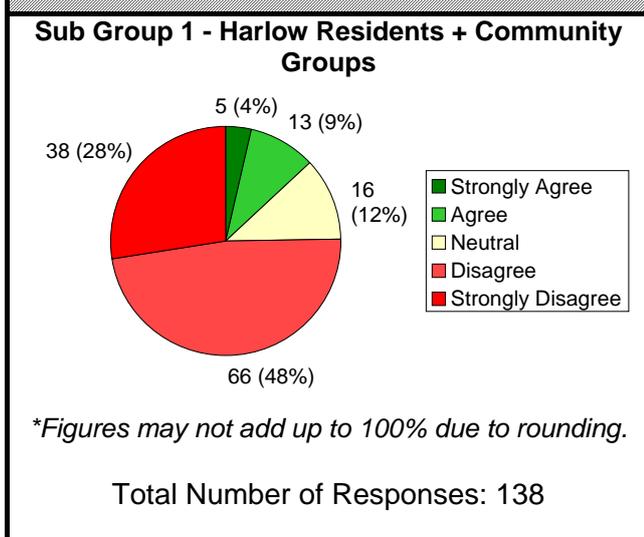
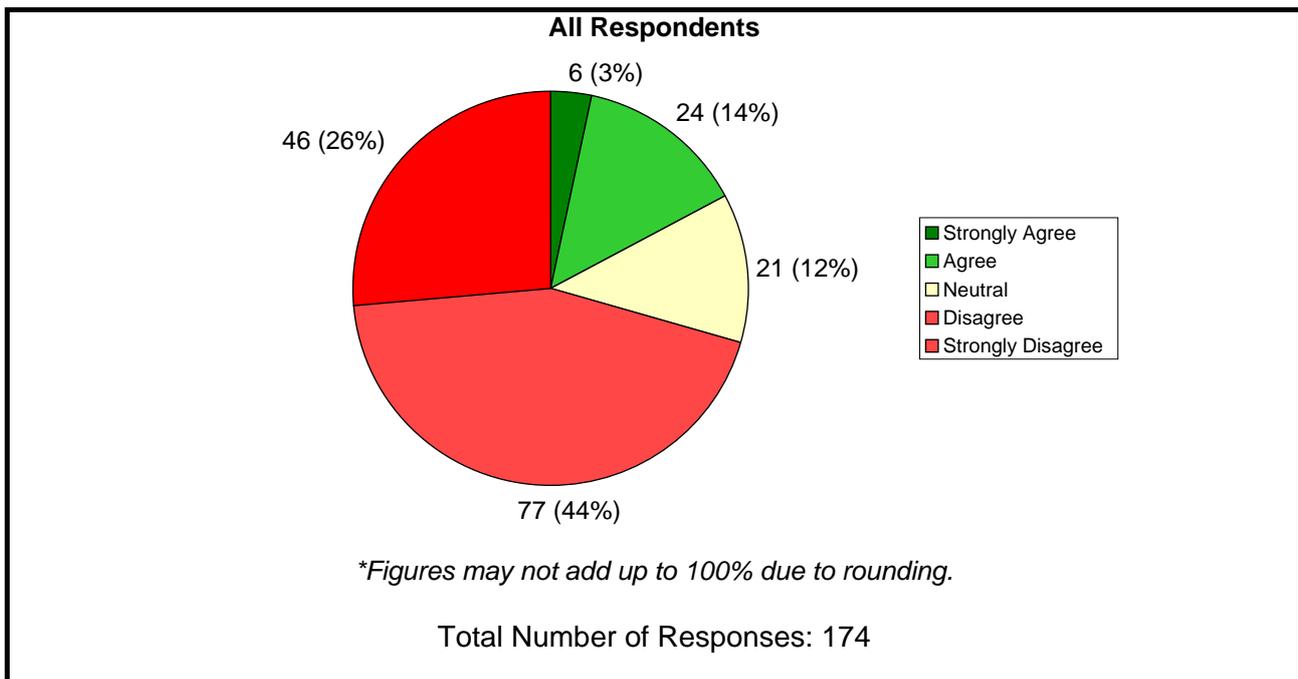
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Set out below is a summary of additional comments received in relation to Option A:

- Development to the north will split the town.
- Development to the north will never be part of Harlow.
- There isn't sufficient capacity in the road system, without a new access to the M11.
- This option would have a negative effect on the historic villages of Hunsdon and Eastwick.
- Why is Harlow preserving its environment at the cost of residents in another District?
- This option doesn't seem to comply with the themes and other strategies referred to in the Issues and Options document.
- This option is preferred as it allows new infrastructure to be provided all in one place, rather than spreading the burden around existing areas of Harlow. The Green Belt should be left alone.
- Development to the North of Harlow is preferable to destroying Harlow's Green Wedges.
- Careful thought is required to ensure growth to the north is linked to the town centre and Temple Fields for pedestrians in terms of crossings and paths.
- This approach can only be considered if appropriate transport links are in place.
- Harlow doesn't need to expand any more. What is needed is better housing for the existing population.
- The brief for the Options Study was misguided so all options are irrelevant.
- Harlow north development would lie outside both Essex and Harlow Council's control, so wouldn't work without changes to administrative boundaries.
- It's unwise to put all our hopes for growth on this option as East Herts. Council are the decision makers and do not favour this option.
- Proposed housing is way beyond local need.
- The East of England Plan is discredited and shouldn't be used.
- Connectivity problems across the Stort make this option unviable. Connections between the north and south would be very difficult and costly, financially and environmentally.
- Unless access between the A414 and the M11 is addressed this would increase congestion.
- Expansion to the west is supported, which scores highly in the Scott Wilson report.
- Consultants are correct to view transport connections as being inadequate to support this option.
- This is the best option, if the Green Belt has to be developed.
- This option will result in urban sprawl into the Green Belt and amalgamation with existing towns.
- Because there are methodological irregularities with the way Scott Wilson have created and appraised these options, the findings are invalid.
- Any extension to the west or south is unsuitable because of the sensitivity of the landscape and the distance from major facilities and public transport.
- Housing without employment will create a dormitory town.
- There are hundreds of empty homes in Harlow.
- This is the best location near railway, A414 and not far from the M11.
- It would be essential for sewerage / water infrastructure problems to be resolved.
- This option is predicated on the East England Plan, which is no longer relevant.

- It is unclear why Harlow is consulting on these options as they were not intended to form options for consultation at Issues and Options stage.
- Flood Risk Assessments and the Sequential Test should inform the location of growth in Harlow.
- Uncertainty exists over the delivery (in terms of land acquisition and funding of infrastructure)
- There is uncertainty about the planning and political acceptability of growth to the north with East Herts. DC and Herts. CC.
- Harlow's evidence base shows that large-scale urban extensions to the east would have the least environmental impact.
- The East of England Plan Panel Report concluded that the east of Harlow is the least constrained option for growth. However, Option A fails to direct a significant quantum of growth to the east.
- Considering existing allocations in Harlow's Local Plan at New Hall, it would appear that less growth is directed to the east than is already approved.
- Scott Wilson should have concluded that Option A does not utilise the least sensitive land.
- Option A is top down and based on flawed and withdrawn policy in the East England Plan.
- Option A is a very high risk strategy since it places the majority of Harlow's future development in a single site which is outside the control of Harlow Council.
- Large allocation to the north fails to utilise existing educational capacity, most notably at primary schools.
- There is a need for more realism about feasible annual house building rates.
- This option will not facilitate the regeneration of the town.
- The methodology utilised by consultants isn't adequate to consider whether development in any location would support regeneration.
- Lower levels of growth to the north, immediately adjacent to the town, coupled with expansion to the east, south and west would offer significantly better outcomes in terms of regeneration and sustainable transport.
- Perceived negative constraints to development to the north by consultants aren't actually barriers to development.

Question 22 - What is your view on the Consultant's recommendations regarding Option B?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Set out below is a summary of additional comments received in relation to Option B:

- Existing Infrastructure Deficit
 - Expansion of East Harlow would increase traffic congestion in Harlow, damage Harlow's economy and result in loss of jobs and deter new businesses.
 - The road system cannot cope with this level of growth to the east.
 - Growth to the east would increase flooding problems in this area.
 - This option would generate demand for secondary schools which would overwhelm current provision, without providing sufficient dwellings to justify a new secondary school in any single location.
 - Concerns about lack of transport infrastructure to the south of the town and that housing development here would encourage car use and increase traffic congestion.
 - Expansion to the east would further stretch road, rail and school infrastructure.
 - This option doesn't support Harlow's rail infrastructure.
 - This option will have a major impact on Roydon, particularly in terms of traffic.
 - Development to the north of Harlow is not possible because of inadequate transport connections.
 - Option B proposes far too much growth for Old Harlow and Churchgate Street, which cannot cope with more traffic and flood risk.
 - Northern growth would add to traffic problems.
 - Consultant's views about growth to the south encouraging car use are shared.
 - Development to the south and west would not have good access to schools, healthcare, shops and the roads couldn't cope.

- Direction of Growth
 - The East of the town is the only place which should be expanded.
 - Spatial Option B reflects a more balanced distribution of growth within Harlow.
 - Harlow north being limited to below 4,000 is supported.
 - More development to the west and less development to the east is suggested.
 - The proposals are very vague and lack detail.
 - This option would successfully complete the Katherines and Sumners extensions to Harlow.
 - The level of growth is far greater than Harlow needs.
 - The East England Plan required significant growth to the north, recognising this would act as a transformational catalyst to stimulate further investment in Harlow and address current deficiencies. Small scale incremental development would not provide this level of change.
 - Harlow north is the only realistic location where the level of growth required could be provided.
 - 3,600 dwellings to the north would be a missed opportunity.
 - It would be preferable if more houses were built in the south than the west.
 - The level of growth to the north in this option needs to be on a greater scale, as, unlike extensions to the east, south and west, development to the north would not be able to link into existing neighbourhoods and infrastructure.

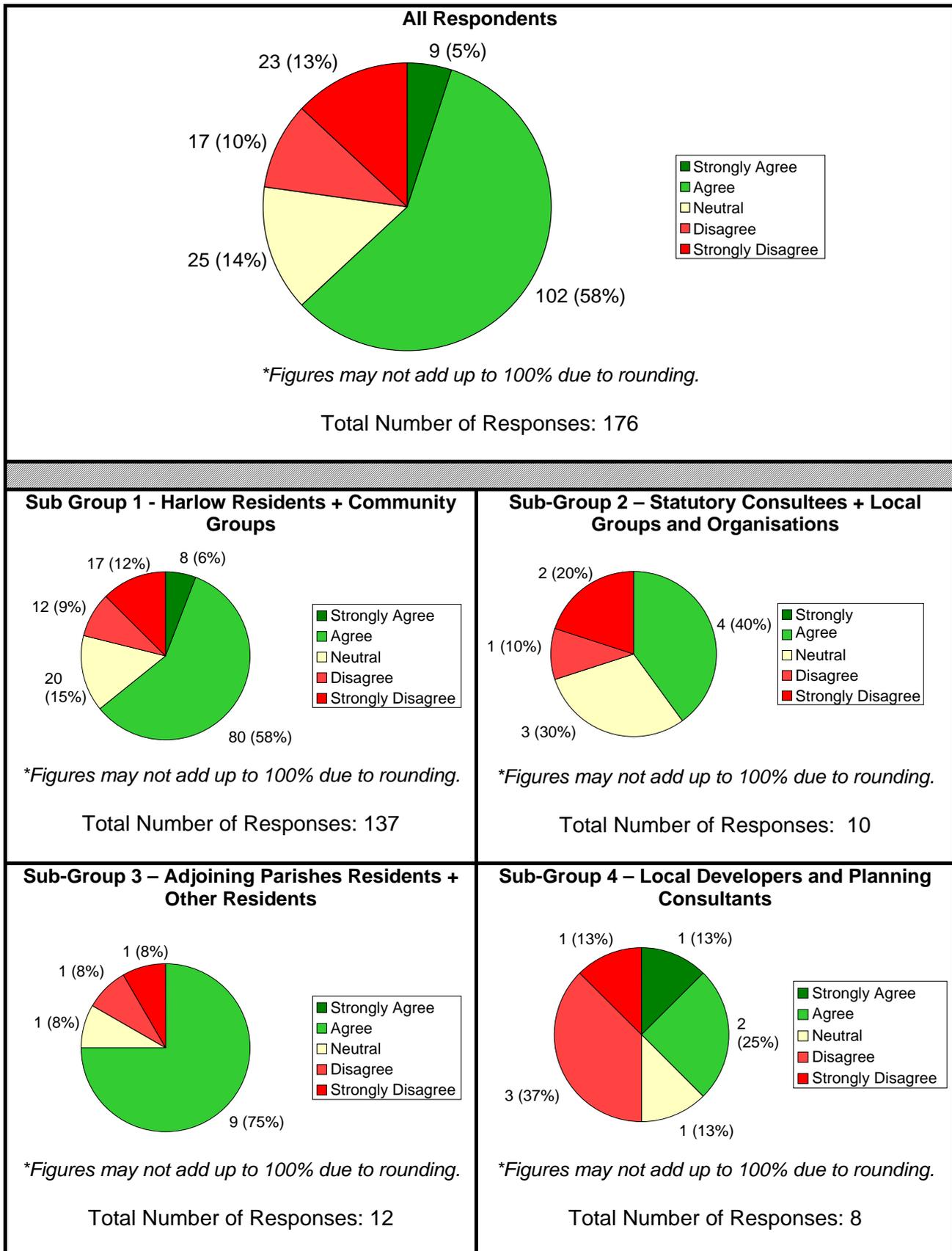
- Harlow north is better related to transport and town centre, employment areas.
 - Water Cycle Strategies need to inform the level of water infrastructure required to serve developments.
 - Strategic Flood Risk Assessments be used, along with the sequential test approach to determine the location of growth.
 - This option is favoured but only if Gildea Way is not developed.
 - There shouldn't be development in East Herts.; there is sufficient space around Harlow in Essex for development.
 - Option B directs only 3,300 dwellings to the east, even though the housing capacity in Miller Strategic Land's control is 4,500 to 5,000.
 - Directing only 3,300 dwellings to the east of Harlow fails to utilise the least environmentally sensitive land.
 - This level of growth to the east and south could result in coalescence with Roydon and would compromise the southern ridge line.
 - Roydon Village could be adversely affected by this option and absorbed into Harlow.
- Providing additional Infrastructure
 - Fragmented development wouldn't raise sufficient funds to upgrade the existing infrastructure in order to cope with development.
 - This option would spread the load but new infrastructure would be more costly and unfeasible.
 - It won't be possible to provide the right infrastructure for all of these new separate developments.
 - Development to the north of Harlow will need to fund a sewerage treatment works.
 - Development to the east will require an upgrade to the Rye Meads Sewerage Treatment Works.
 - Development to the north would be able to accommodate all necessary physical and social infrastructure for new residents, avoiding negative impact on existing services and facilities in Harlow. Option B would fail to provide infrastructure in a similarly comprehensive way.
 - The potential to explore innovative energy and drainage technologies on north Harlow would reduce the sewerage constraints.
 - Focusing growth to the north provides the opportunity to leverage investment rather than focusing growth in incremental parcels of land around Harlow.
- Environmental Constraints
 - Any development to the south should not breach the sky line of Rye Hill ridge.
 - Expansion to the south would bridge the edge of the basin and be visible for miles around, contrary to Gibberd's original plan.
 - There would be a huge impact on the character of existing communities.
 - Growth to the north and east of Harlow would infringe areas of natural wildlife, historic habitats and unspoilt countryside.
 - There should be no development on the Green Belt.
 - Development to the east of Harlow would be environmentally undesirable.
 - It is environmentally unacceptable to develop the north.
 - Growth to the west risks coalescence with Roydon.
 - Growth to the north will not avoid coalescence with Sawbridgeworth at all.

- Policy Context
 - Option B is based on Policy HA1 of the East England Plan and therefore explicitly top-down.
 - This recommendation is based on flawed and withdrawn policy which should no longer be considered.
 - People are more important than the policy of the East England Plan.
 - Despite being a “policy-led approach”, Option B fails to distinguish between the size of urban extensions to the east and west, as stipulated by Policy HA1 of the East England Plan.

- Regeneration
 - Growth north of the Stort wouldn't be part of Harlow.
 - Any development to the south should be in conjunction with the redevelopment of existing areas. Lower growth could be possible in the south if nearby areas were redeveloped.
 - It's unclear how these developments will assist regeneration of adjoining Harlow neighbourhoods.

- Methodological Concerns
 - Option B – being the only option consultant's viewed as being “reasonable” – is surely worthy of serious consideration.
 - Scott Wilson's report was intended to be evidence base, so putting such a large volume into the Core Strategy is unhelpful to the process of providing potential options.
 - Methodological concerns are raised about Scott Wilson's report. The report fails to consider urban extensions fairly and the methodology is flawed, as one Spatial Land Area was split. The conclusions of this study are therefore invalid.

Question 23 - What is your view on the Consultant's recommendations regarding Option C?



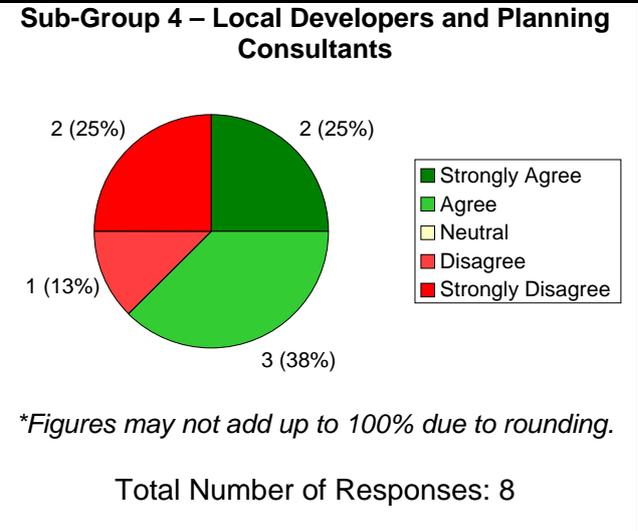
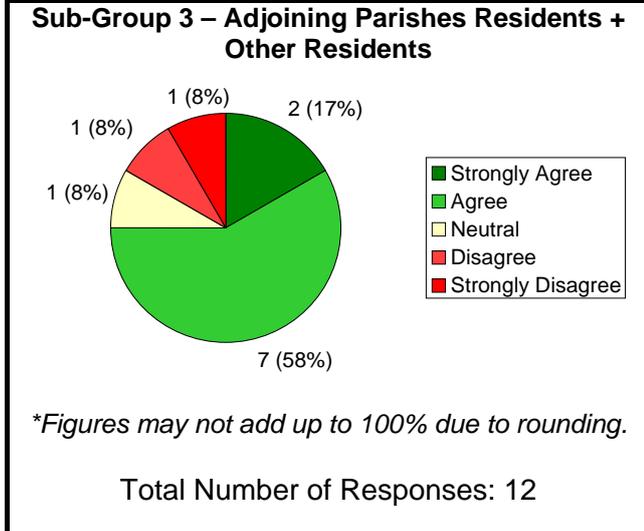
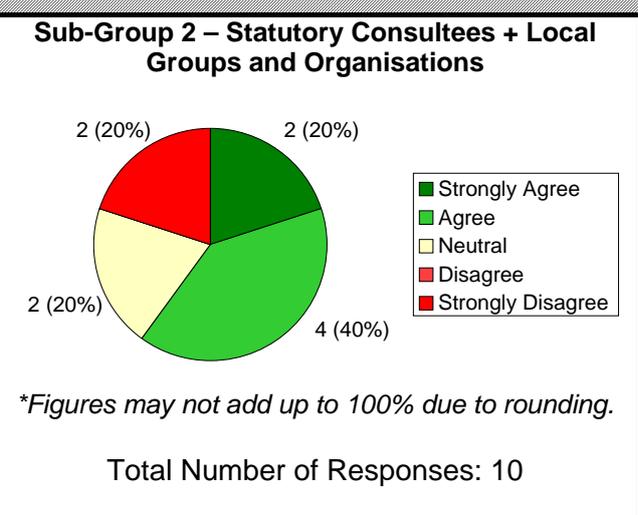
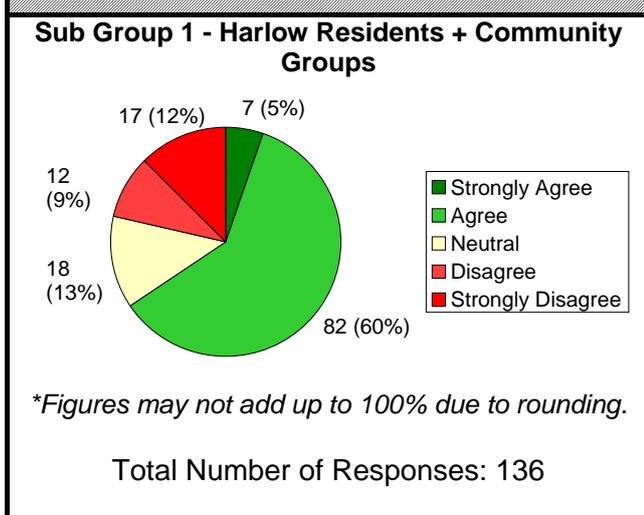
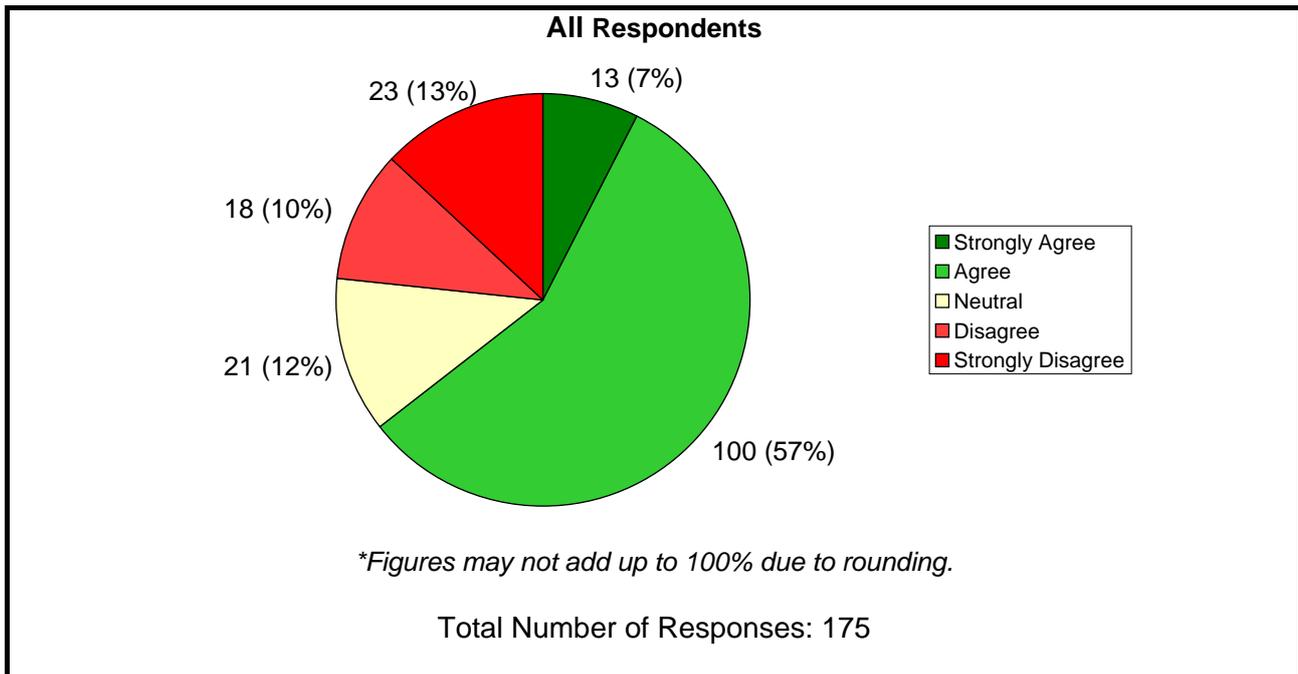
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Set out below is a summary of additional comments received in relation to Option C:

- Expansion of East Harlow would increase traffic congestion in Harlow, damage Harlow's economy and result in loss of jobs and deter new businesses.
- The road system cannot cope with this level of growth to the east.
- Traffic congestion would be worse under this option.
- Flooding would increase.
- The RSS should not drive considerations now.
- The Green Belt should be retained and left free from development.
- Public transport links need to be improved to Harlow and Epping station.
- Any expansion to the south would increase traffic congestion on the A414 and M11.
- It is not right to develop Rye Hill ridge, which would remove an important natural barrier between Harlow, Epping and London.
- Growth to the west should be directed to areas which score well for bringing about regeneration, e.g. land west of Katherines.
- Consultants are overly concerned with private car use.
- It isn't acceptable that this option is ruled out simply because there is no development to the north.
- All options proposed are going to lead to car use, so it's pointless to discriminate on this basis.
- This option would destroy historic villages of Old Harlow and Churchgate Street.
- Methodological concerns are raised about Scott Wilson's report. The conclusions of this study are therefore invalid.
- This option would be least disruptive to the rest of Harlow.
- There's no evidence this would increase traffic congestion on Southern Way.
- This option doesn't address Harlow's transport problems.
- Scott Wilson's analysis is that Option C is the most sustainable option but doesn't comply with Policy HA1. This is based on top down policy which is now removed, so shouldn't apply.
- Flood Risk Assessments and the Sequential Test should inform the location of growth in Harlow.
- The criteria used by Scott Wilson to assess the impact on regenerating Harlow is flawed.
- The study also overplays the proximity to the M11 junction in encouraging car use and congestion. Surely growth to west would lead to cars traversing Harlow to get to the M11 and causing congestion?
- Growth to the east is preferable in terms of Green Belt as the M11 provides a definitive boundary to further expansion.
- Growth to the east provides the opportunity to provide land for a new M11 junction and a park and ride facility to the north east of Harlow.
- Proximity to Templefields employment land and Harlow Mill Train Station are key sustainability benefits for growth to the east.
- The ridge line would be breached which is unacceptable.
- Growth to the south could also increase pressure for a southern bypass which is also unacceptable.
- From an educational and care perspective this spatial option is likely to require a secondary school without utilising existing capacity at Mark Hall School.
- Passmores and Stewards schools are also likely to find the proposed scale of growth challenging.

- Growth to the east should be strongly linked to existing public transport interchanges such as the town centre and Harlow station.
- The residential nature of southern way means that it cannot cope with this level of growth to the South.
- Whether this option complies with the RSS is no longer relevant.
- All spatial options will impact on car use and congestion.
- There is the potential for a rapid bus transit route between southern extensions, existing neighbourhoods and the town centre.
- From a landscape perspective this option would be preferable.
- Extensions to the east and south could incorporate many landscape principles, e.g. Gibberd.
- Methodological inconsistencies raised about Scott Wilson's study.
- The East of England Plan remains part of the Development Plan for Harlow, so the consultant's conclusions about this option are valid.

Question 24 - What is your view on the Consultant's recommendations regarding Option D?



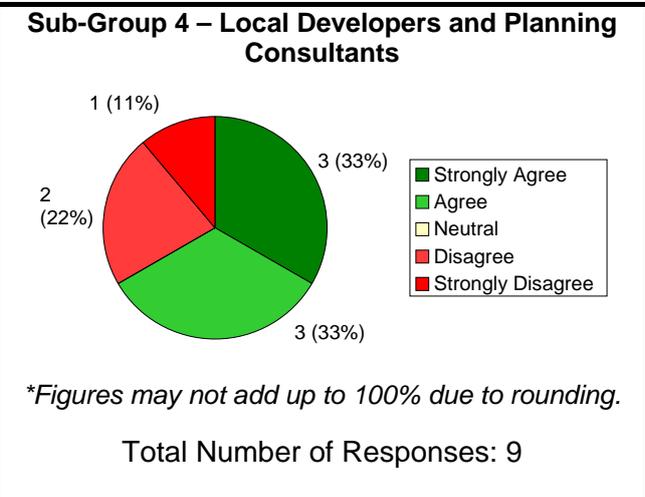
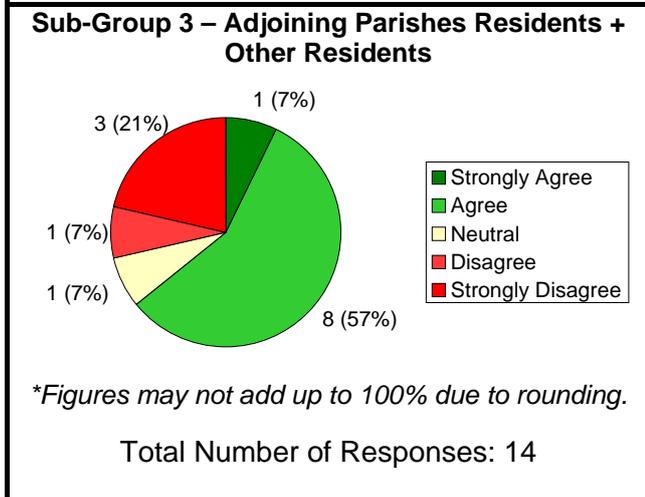
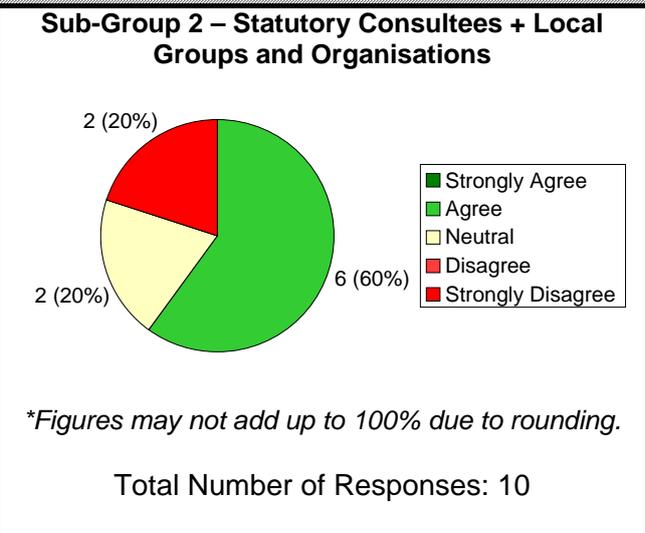
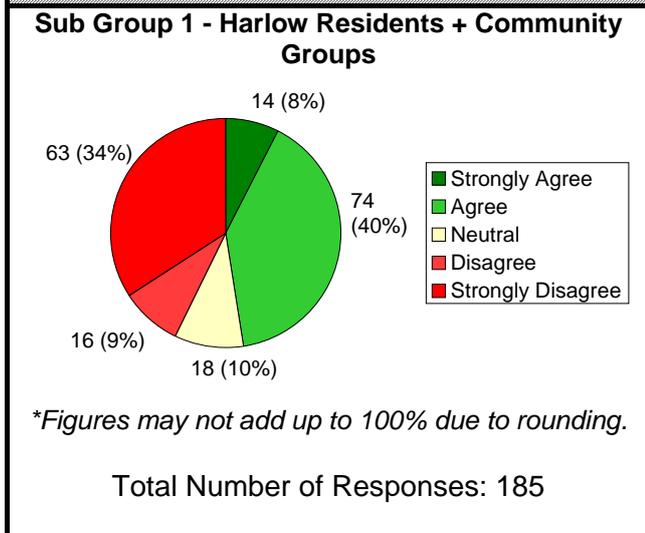
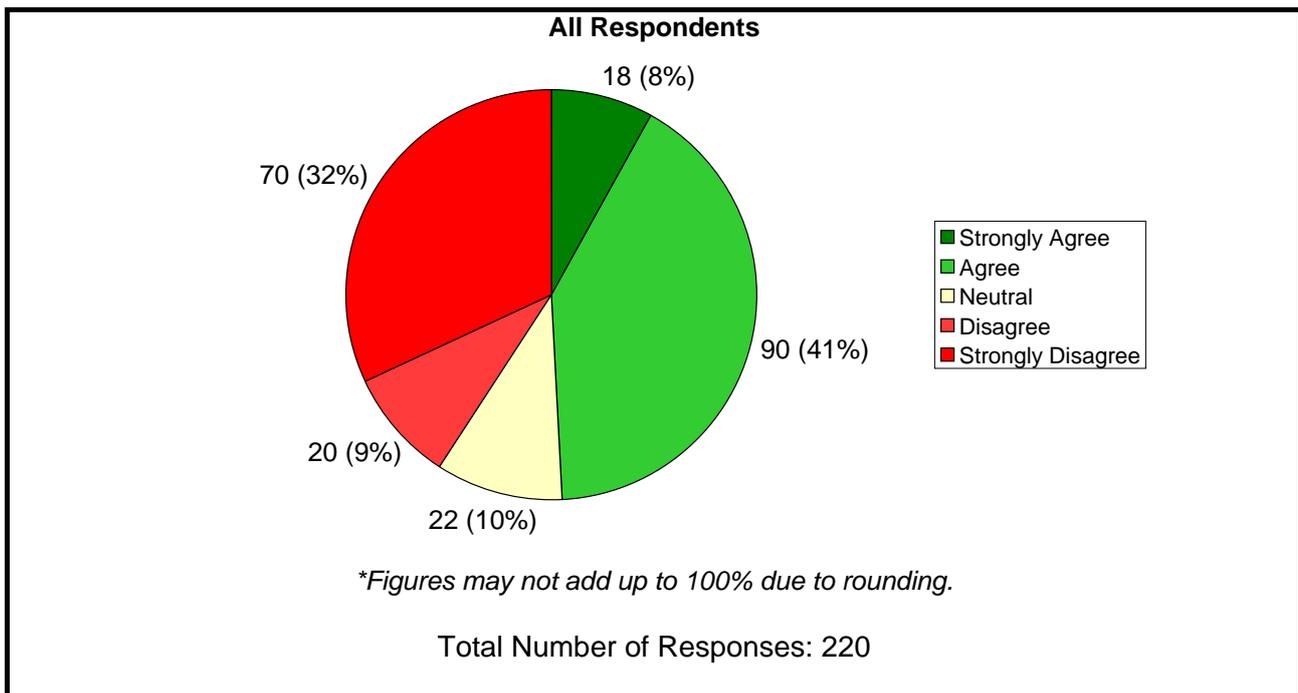
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Set out below is a summary of additional comments received in relation to Option D:

- Development to the north is problematic because of inadequate transport connections.
- Large scale development to the north is unachievable because of sewerage constraints.
- Development to the north is unacceptable because of the environmental and landscape impact.
- Flooding is a real possibility north of the Stort.
- Development to the east would negatively affect the historic villages of Old Harlow and Churchgate Street and surrounding ancient landscape.
- Development to the north wouldn't regenerate Harlow and is likely to deplete the quality of life of people already living there.
- The Green Belt should be protected.
- Development to the north of the Stort is likely to link with Hertford and Bishop Stortford, rather than Harlow.
- All opportunities to bring forward vacant Brownfield sites should be explored before development outside Harlow.
- Money needs to be spent on regenerating the existing housing first.
- Archaeological sites should be considered, prior to development.
- The southern ridge is vitally important geographic division from Epping and London and should be retained.
- This level of growth cannot be catered for by Harlow's schools.
- There is a lot of reliance on building in East Hertfordshire, which is a risk.
- Expansion to the east of the town will put unacceptable pressure on infrastructure.
- Housing to the west of Harlow is supported (i.e. land to west of Katherines).
- Development to the north will split the town due to connectivity problems across the Stort.
- Development to the south will create unacceptable pressure on existing infrastructure.
- Major development very close to Harlow's main train station should be considered.
- This option risks coalescence with neighbouring towns and villages in the Green Belt.
- Concerns are raised about methodological irregularities in the Scott Wilson Report. Namely, the way consultants developed spatial options. This means that the options put forward are based on a biased and flawed approach.
- Employment growth is necessary before housing, to avoid creating a dormitory town.
- The green areas within the town should not be destroyed.
- Major growth to the north does not fit in with the original plans for the town.
- Development to the north will increase traffic congestion in Harlow.
- The level of development to the east is not relevant to bringing forward a new junction on the M11.
- The evidence used by Scott Wilson to develop the regeneration-led option should guide development to the south and east, rather than the north (see figure 8 in the Scott Wilson Report).
- In Scott Wilson's study, areas to the north of Harlow score well on regeneration but this is as a result of specific rural circumstances. However, this has no relationship with the regeneration needs of Harlow and is a major flaw.

- The Scott Wilson report warns that major growth to the north could negatively impact efforts to regenerate the town by creating a separate new extension. However, this point seems to have been overlooked when formulating this regeneration-led option.
- Flood Risk Assessment and the sequential test should guide any final option.
- Growth to the north will require upgrades to the Rye Meads Sewerage Treatment Works.
- To have regeneration benefits to Harlow, there needs to be close proximity between new development and the existing neighbourhoods in order to improve housing, employment and environmental conditions for areas in need of regeneration. In this context, large-scale development to the north is questioned.
- Option D fails to utilise the environmentally least sensitive land to the east.
- Proposed development to the south is likely to result in increased traffic congestion on Southern Way.
- Comments on the highways impact on the south of Harlow are objected to. Surely, there will be highways impact as a result of any growth in all these locations, so it is unclear why southern way is singled out in particular.
- Harlow lacks credible evidence to support regeneration-led growth.
- Harlow's Regeneration Strategy should be the cornerstone of any regeneration-led approach, but it is lacking in detail.
- Development to the north on this scale would be a competing settlement with Harlow, as recognised by the Panel Report to the Examination in Public of the East England Plan. This issue isn't considered by the Options Study.
- Major development to the north would divert investment away from Harlow and undermine regeneration aims.
- The provision of only 5,720 dwellings to north Harlow is a missed opportunity.
- Transport and sewerage constraints to the north are over-exaggerated by the consultants.
- The Harlow Infrastructure Study does not represent a sufficiently robust assessment to allow conclusions about infrastructure requirements for north Harlow to be drawn.
- Traffic modelling undertaken on behalf of developers demonstrates that development could be accommodated with minor improvements to the existing network.

Question 25 - What is your view on the Consultant's recommendations regarding Option E?



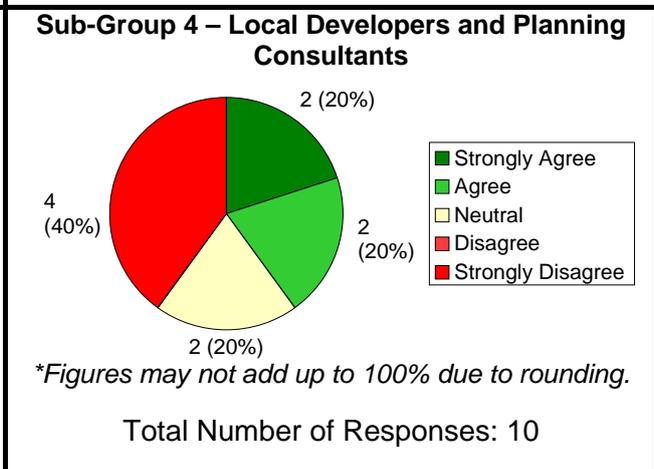
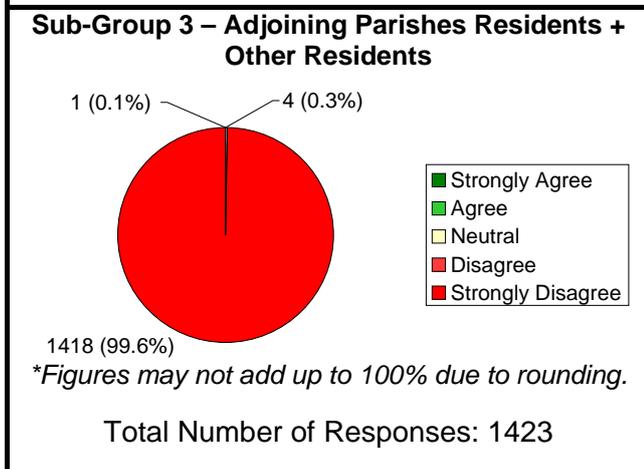
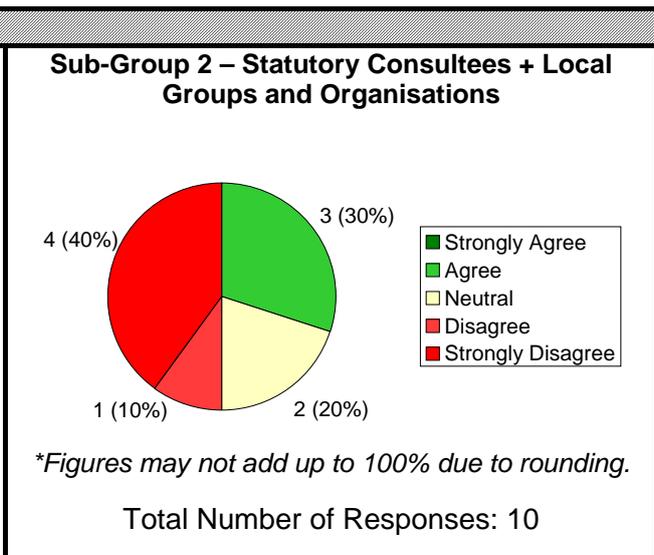
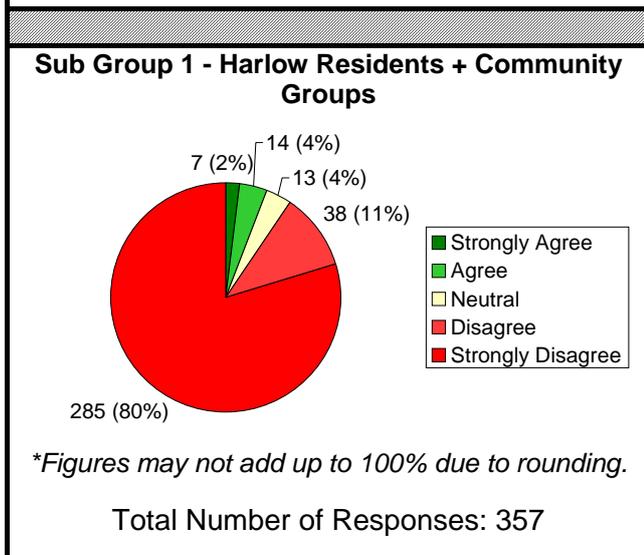
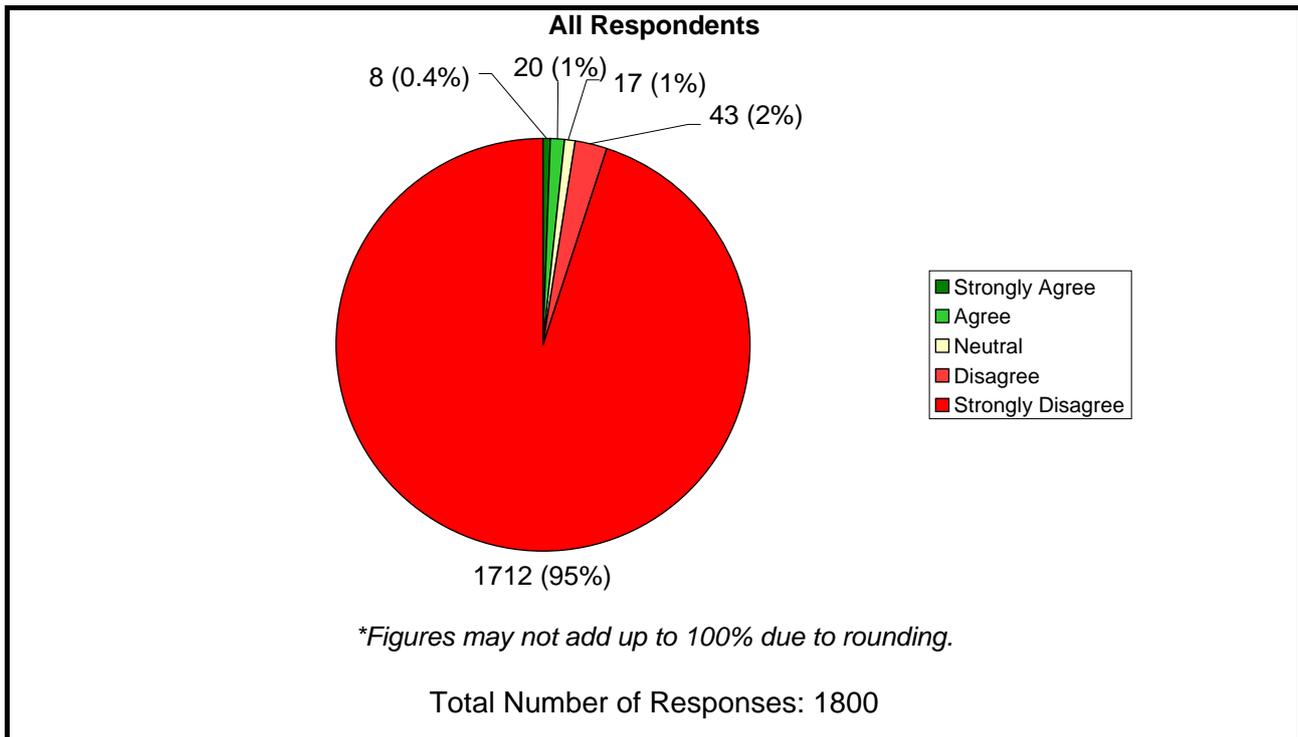
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Set out below is a summary of additional comments received in relation to Option E:

- Concerns about coalescence with Sheering.
- Coalescence with Roydon is unacceptable.
- Growth to the west is supported over growth to the south (which has more significant landscape and southern ridge line)
- Other respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid.
- Development on land north of Gilden Way would be inappropriate for landscape, archaeological, traffic congestion and flooding reasons.
- Consultants don't seem to have knowledge of local issues.
- Traffic congestion would reach saturation point under this option.
- The Green Belt should be protected and retained.
- There needs a new link to the M11 before development takes place.
- There needs to be more sustainable transport going through the town.
- Transport led investments should be directed to Harlow Mill Station.
- Harlow Mill is a local stopping only and cannot be considered as a major transport link.
- Growth to the west would cause access and parking issues with Roydon Station and cause traffic congestion.
- Development to the west would impact the Stort Valley landscape areas.
- The scale of development to the south and west needs to be sufficient to support the regeneration of deprived areas of Harlow.
- Scott Wilson's report states that Spatial Land Areas EH10, EH6 and EH7 do not score highly and the barriers between these areas and Harlow (i.e. the A414, River Stort and Navigation Way).
- Strategic Flood Risk assessments and the sequential test should guide the location of growth.
- All sewerage upgrades and upgrades to Rye Meads will be required irrespective of the location of growth. Therefore it is incorrect to discount particular locations for these reasons.
- If enhanced sewerage capacity isn't provided in time to serve land to the east of Harlow, then on-site provision of treatment will be feasible – either on a temporary or permanent basis.
- Growth to the east provides more potential to make land available for a future new M11 junction and necessary highway approaches from east Harlow.
- This area could also provide a continuous public transport corridor between the M11 and Harlow Town Centre, in addition to potential park and ride facilities.
- The availability of transport infrastructure and the ability to safeguard and deliver new transport infrastructure is a strong reason to direct development to the east of Harlow.
- Growth to the south, north and west of Harlow would not deliver the transport and infrastructure benefits which growth to the east could provide.
- This option provides an unbalanced distribution of growth and fails to take advantage of small scale growth to the south west.
- Development on Green Belt to the east is preferable as it would be contained by the M11.
- Development to the east would also relate better to Harlow and relate to the existing road network and railway stations.

- This option would require 2 new secondary schools and would make utilising the expansion potential of Mark Hall challenging.
- This option is supported because it is most likely to increase use of sustainable transport, walking and cycling and reduce congestion.
- This option would be reasonable were it not in conflict with the East England Plan.

Question 26 - What is your view on the Consultant's Suggested Approach to accommodating growth around Harlow?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Set out below is a summary of additional comments received in relation to the consultants' suggested approach:

- Concerns raised about development on the eastern side of Harlow, in particular the inclusion of Land North of Gilden Way.
- Land North of Gilden Way should be kept in reserve for Council House building
- There must be growth.
- One step at a time
- Development will be above the ridge line all round Harlow.
- The rejection criteria of other Spatial Options are just as valid for this option.
- The option does not appear to take into account potential flooding.
- All options will destroy attractive and historic landscapes and countryside.
- There should be as little expansion as possible into the Green Belt.
- The western expansion is perhaps the least harmful
- Agree in general with the consultants comments.
- Deal with traffic congestion first.
- This option removes the "Green Village" concept of Harlow's design.
- Regeneration within town would be better investment
- Development is not wanted
- The consultants were asked how to accommodate growth, rather than what is best for Harlow. It was the wrong question
- Quality of life sacrificed for bureaucratic targets.
- Will cause drainage problems and traffic congestion
- We don't need another village. Need for recreational space, and heritage protection
- Strongly disagree. Option is constrained by Policy HA1 of the East of England Plan which is to be revoked. Without that constraint option c is preferred.
- This approach is unsustainable, and will do damage to the economy and environment of the area.
- No analysis has been provided to indicate how much development would provide overall benefit to Harlow.
- Support a better not a bigger Harlow.
- The area north of Harlow should remain an essential part of the Green Belt.
- Future direction and strategy should wait until the Localism Bill is enacted.
- This is the Preferred option, but without the houses north of the river.
- Cover valuable farmland
- Object to expansion into the Green Belt
- Object to expansion to the north
- Object to expansion the north east
- Object to expansion in the south west
- Object to expansion to the south
- Growth to the east should be limited to around Newhall
- Expansion east will create acceptable pressure on infrastructure connecting to town centre , M11, and stations
- Expansion south will create acceptable pressure on infrastructure connecting new development to M11
- Development north would potentially split the town in two. Connections north and south would be problematic and costly financially and environmentally
- Land to the west has been identified as appropriate.
- Gilden Way is important boundary to the expansion of Harlow

- Level of development near M11 J7 is too high
- Growth west is supported, not next to the Pinnacles, but adjacent to Katherines. This is supported by the consultants
- Development to the north should take priority
- Do not understand the diagram
- Consultants have argued against land to the north, yet in this option they recommend it.
- Development to the north would not integrate with Harlow
- Least suitable of all the options
- Strongly disagree with development to the east
- Harlow north fits the criteria if it is nationally clear we need more houses
- Option is loathsome and illogical.
- Agree with some reservations about potential resistance to development.
- Growth should be more equal around Harlow
- Most logical
- Phased development
- The need for new development is not being driven by housing need, but as way to raise funds.
- Consultant's report is flawed concerning the western growth area in terms relation to this option, and should be removed as part of the evidence base.
- No development outside present areas is necessary.
- Employment must come first to provide the incentive to improve the environment.
- Housing without employment will create a dormitory town.
- Junction onto the M11 is the highest priority for regeneration and sustainability
- Fail to see how this will solve any of the issues and the other problems
- Does not offer any benefits to the town
- Empty homes in Harlow that are too expensive, building thousands of homes is not the answer.
- A new M11 link road would not be able to cope.
- Regeneration areas should not prejudice the rest of the town
- Options Study should be reviewed in the light of the revocation of the East of England Plan.
- Concentrate development in one area, so that proper infrastructure can be provided.
- Consultant has turned down first five options regardless of his previous objections
- Best option, however, less housing to east and more in the south
- North is the best option. Fragmenting development is not a good idea. Remove east, west, and south, and concentrate in the north where infrastructure could be provided from funds from development.
- Against any development in Hertfordshire, especially Gilston and Eastwick
- Sustainability appraisal should be informed by a strengthened evidence base for the historic environment
- Suggested approach should be viewed in the context of the abolition of the E o E Plan
- The abolition of East of England Plan makes the constraints led approach option set out in the Consultant's study more relevant, and would indicate development to the east was appropriate.

- Options A-E and suggested option could all be acceptable, sequential test and Strategic Flood Risk Assessment should inform decision on option.
- East of Harlow could accommodate around 7700.
- East is least environmentally sensitive location
- M11 junction can only be achieved if Eastern growth is brought forward first.
- Lack of certainty over cooperation between Harlow and adjoining districts, may frustrate growth.
- Eastern growth can be brought forward as a standalone first phase of growth.
- Address environmental concerns
- Potential problems with southern ridgeline
- South and west allocations are not strongly related to the town centre, employment sites or station, thus increasing car commuting.
- Most appropriate distribution to ensure best use is made of opportunities, but avoiding pressure in particular locations
- The case for Harlow north is generally supported
- Consultants' study lacks detail in appraising sites around Harlow, and is consequently not a robust assessment.
- East of England Plan evidence base remains relevant
- Majority (11000) of the 16000 requirement should be accommodated at North Harlow.
- Development to the North will benefit East Herts. in that its development can be focussed here rather than in isolated villages and towns.
- Development in North Harlow will be able to bring about transformational change.
- A road link from the Pinnacles northwards should be promoted, which will bring a number of benefits.
- Stort Valley could become a new focus for the town.
- Consultant's report is a robust piece of work.
- Findings of the report still hold good as to the most appropriate way to accommodate growth.
- Additional housing units to 2031 make new secondary schools viable.
- From educational and care service it is preferable that northern extension is delivered before eastern to provide services earlier in the plan period.
- Expansion potential at Mark Hall may be utilised for early growth in the east.
- Precise phasing is required to ensure social infrastructure is in place.
- This option addresses some of the key transportation issues associated with north and east development.
- Development in south and south east will have significant impact on Southern Way.
- A Green Belt review should consider all land on the edge of Harlow as to whether it is performing the Green Belt function, and ensure that sufficient land is available and does not require further review.
- Justification for suggested option is consistent with the way options A-E were assessed.
- Southern growth area in this option does not reflect the higher growth target accepted in option B.
- Highway constraints have not been applied consistently in the options
- This option failed to consider a lesser sized urban extension to the west of Harlow.
- Land to the west should be identified as an alternative site to the south.

- The pending revocation of the East of England Plan points to the constraints-led option in the Spatial Options Study.
- Growth of Harlow can achieve regeneration, but as the EIP panel notes that it is the form of the development is as, if not more, important than the quantum.
- Must ensure that a separate settlement is not created, which would happen if north Harlow developed significantly.
- Balance of issues following the revocation of The East of England plan should concentrate on regeneration.
- Growth North of Harlow can relieve pressure on the historic towns in East Hertfordshire and Epping.
- Disagree with the consultant's assessment of the constraints in the Northern growth area.
- Expansion east and south will put considerable pressure on infrastructure.

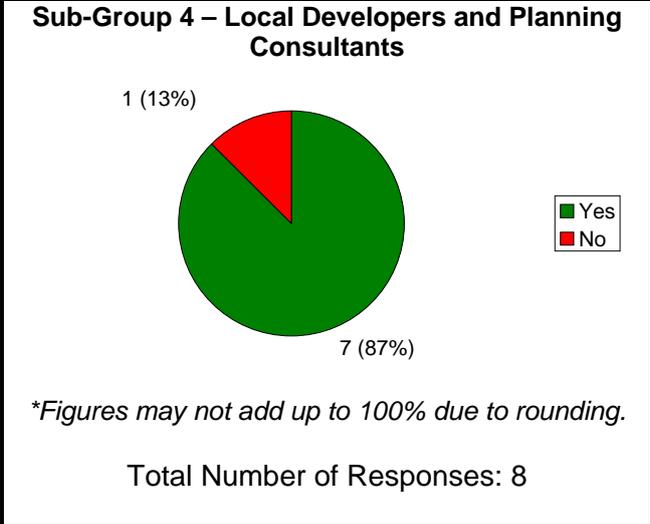
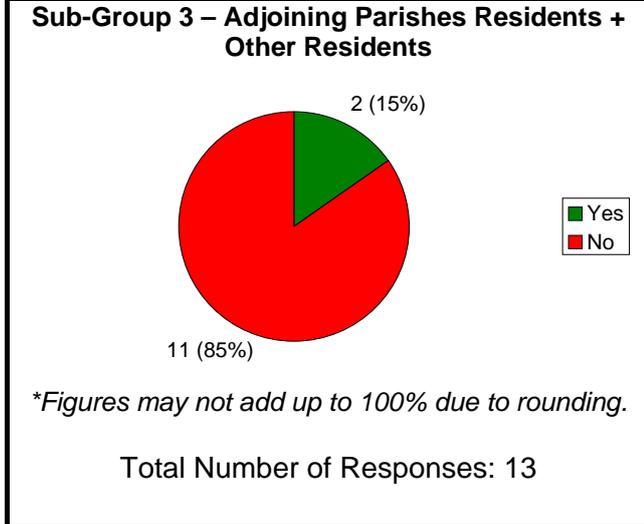
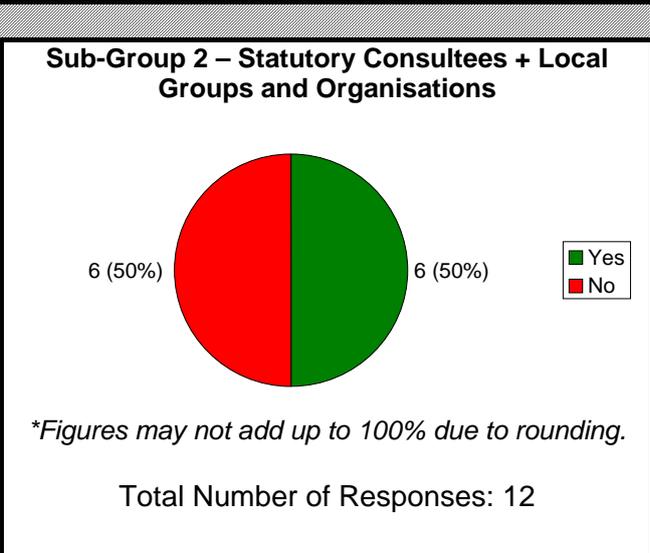
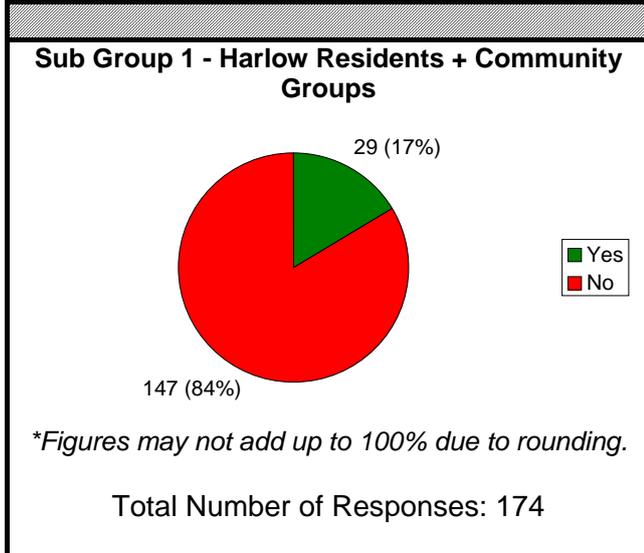
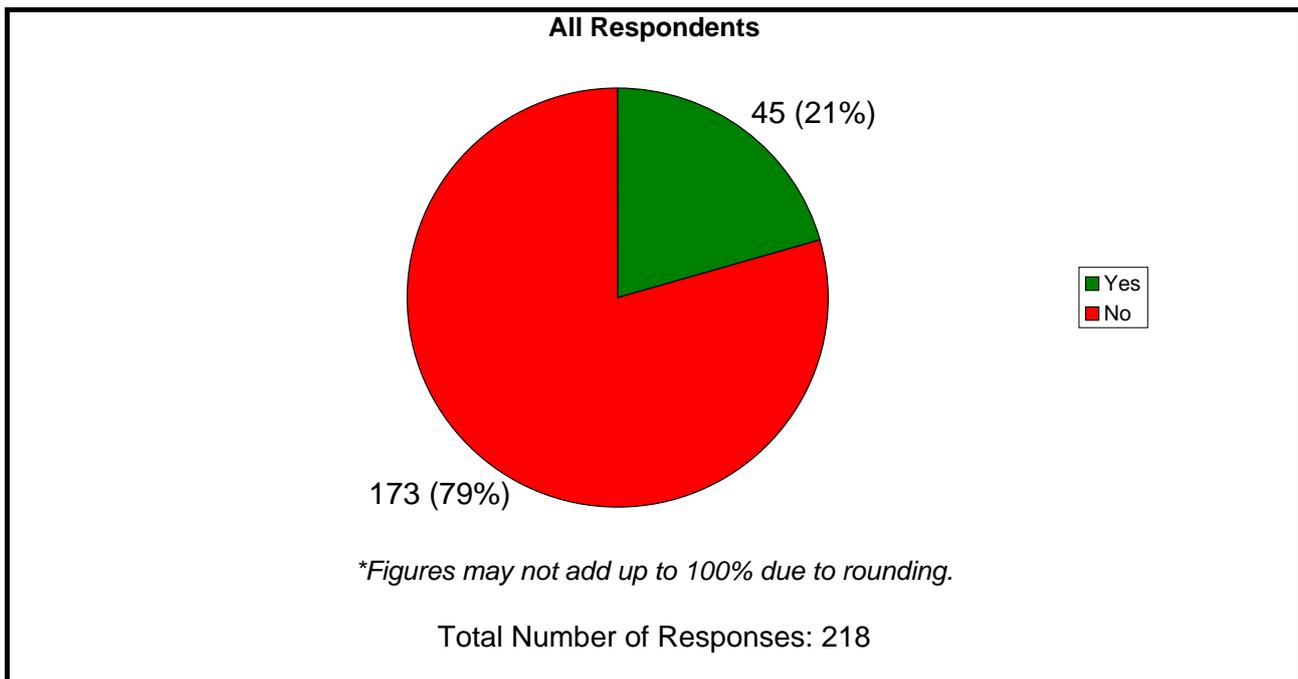
Question 27: Do you have any other comments on the approach to growth around Harlow?

Below is a summary of the comments received in relation to this question:

- Harlow's infrastructure is inadequate to provide for the large scale development proposed
- Traffic congestion is significant issue in Harlow. Until firm commitments to infrastructure investment are made (particularly road, rail, water supply and disposal, flooding and traffic) no further development should be started around Harlow.
- Any further development on Harlow's perimeter will only encourage London commuters to the area with no input to the local community.
- Green fields north of Harlow are not suitable as a broad location to meet district wide housing requirements. The towns and villages north of Harlow should be treated no differently in the LDF from other towns and villages of similar size and character in the district.
- I support limited housing to meet local needs in accordance with locally developed parish and town plans. I strongly object to major development north of Harlow.
- Insufficient capacity at local hospital, surgeries, schools and leisure facilities
- Development would damage green space and Green Belt
- Development strategy could blanket out the historic value of the town. Should look at Letchworth and Broxbourne for examples of places that have retained theirs.
- Shouldn't progress given the intended abolition of the East of England Plan.
- Development to the north of Harlow is badly thought out and would lead to an unbalanced development
- Growth to the north has been undermined by Independent Inspector, Local authority, County Council and UK Government. Argument for Harlow north have failed.
- Brownfield land should be used before any Green Belt land is considered.
- Harlow needs to be regenerated from within and not by building around the town.
- Important agricultural land would be lost.
- Plenty of green areas within Harlow to support new housing.
- Impact on villages to the north of Harlow.
- Destruction of important habitats in the area and loss of valued countryside.
- Growth to the north would compete with Harlow for regeneration.
- Make better use of unused land within Harlow i.e. around industrial areas which could be rezoned for residential areas.
- Development to the north would result in a loss of amenity for walkers
- Potential for more infill within Harlow.
- Question Options Appraisal methodology when assessing the suitability of land for development,
- South and East Harlow has potential for further growth.
- Concerns with the methodological irregularities of the Options Appraisal report and believe that the study is flawed and does not provide a robust basis to inform growth options around Harlow.
- Plans should consider the shape and design of Harlow.

- Growth must regenerate the central areas, otherwise these will be left bleak for a generation.
- A case for growth to the north of Harlow has yet to be made. Harlow Council should not pre-empt East Herts. Council's policy process and should not proceed unilaterally with a preferred option based on growth to the north.
- If East Herts. Council's preferred option does suggest that development north of Harlow should form part of a development strategy for East Herts. District, Harlow Council should reflect this in its Core Strategy.
- Water cycle study should be used to inform the most sustainable solutions in water supply. SuDs and biodiversity measures should be included in the proposal.
- It is important to consider capacity issues at Rye Meads.
- Concern that only one growth option is being presented for consultation. Other reasonable alternatives should be considered, to satisfy the requirements of PPS12.
- There is a block of evidence highlighting that a step change in housing provision is required to meet the backlog of unmet housing need, particularly in the East of England. Evidence underpinning growth requirements set out the RSS remains largely unchanged despite the pending revocation.
- Current economic climate means that the Core Strategy should look to smaller scale, organic additions to Harlow's existing neighbourhoods that can be implemented with infrastructure improvements rather than major new provision. Further development should be progressed when market conditions improve and public funding is available. There is scope for this type of growth to the south of Harlow.
- Development should integrate with Harlow and not compete against it. Smaller scale proposals would facilitate regeneration and renewal.

Question 28 - Do you think all the key elements of infrastructure necessary to support the emerging Core Strategy have been identified?



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 29 – If no, what additional infrastructure do you think is needed to support the emerging Core Strategy?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- Funding and Delivery of Infrastructure
 - Unless firm commitments are made to invest in Harlow's road, water and sewerage infrastructure, further development of Harlow cannot be justified and shouldn't be started.
 - Development not supported by appropriate infrastructure should not be supported.
 - It is essential that development is phased with the provision of infrastructure.
 - Infrastructure required should have been detailed for each of these options before opinions can be given.
 - Key aspects of infrastructure are technically undeliverable.
 - Given infrastructure costs and difficulties, it is more realistic to scale back level of development to that which can be accommodated within existing infrastructure.
 - Harlow Council will need to demonstrate how this infrastructure will be funded, given that the funding situation has changed dramatically since HIS was published in March 2010 (and the bulk of the study was carried out during 2008).
 - There will be considerable competition for funds between different categories and it is important that sustainable transport is not squeezed out.
 - Development may be discouraged as a result of unviable developer contributions towards infrastructure. Market is fragile. Small requirements can have a major impact upon project viability, meaning schemes may not proceed.
 - Infrastructure needs of adjoining authorities should also be considered in context of urban extensions and the knock on impacts on infrastructure outside of Harlow should be recognised (e.g. East Herts. and Epping).
 - This question is impossible to answer as the Core Strategy does not contain any formal proposals.

- Reliability of Harlow's Evidence Base
 - Evidence base (Harlow Infrastructure Study) is based on desk top review at a very superficial level. Therefore, the schemes put forward in this study are not supported or justified by any strategic transport modelling work. Further evidence will be required before the transport proposals of the Core Strategy could be defended at an Examination in Public.
 - Evidence base for the Core Strategy identifies key elements of infrastructure but there is a lack of clarity in stating how this relates to different quantities of growth in different locations. Options for development to north, east, south and west of Harlow are not treated consistently with regard to infrastructure.
 - It would be helpful to see thresholds of development in each location that would trigger particular infrastructure requirements and to prioritise development that can be brought forward with improvements to existing infrastructure, as opposed to major new infrastructure.

- Road Infrastructure
 - Traffic on main roads around Old Harlow is already too high for roads' capacity.
 - Proposals are simply going to exacerbate the problem.
 - More slip roads and roundabouts are required.
 - Maintenance of existing infrastructure should be considered.
 - Development in Sumners West would need its own access road to prevent the existing Sumners estate becoming swamped with traffic.

- Traffic Management
 - Accidents on M11 cause gridlock in Harlow.
 - Bus lanes should be reviewed and are not the answer. Better roads (dual carriageways) are required, not more under-used bus lanes.
 - More examination is required into congestion on roads.
 - Reduce the number of traffic lights along Edinburgh Way, First Avenue and Second Avenue to allow traffic to flow more freely.

- Bus Services
 - Better bus links from Harlow to outlying towns and villages is required.
 - There are parts of Old Harlow with no bus service.
 - Public transport needs to be more convenient and better value.
 - For many destinations, no direct bus routes are available (needing to change at Town Centre). This makes buses unattractive compared to the car.
 - Commuters coming into Harlow for employment purposes need a reliable public transport service.
 - Reference should be made to Harlow Bus Station and railway stations.

- Train Stations
 - Car parking at Harlow Mill Station
 - Better use and access to Harlow Mill Station.
 - More parking at Harlow Town Station.

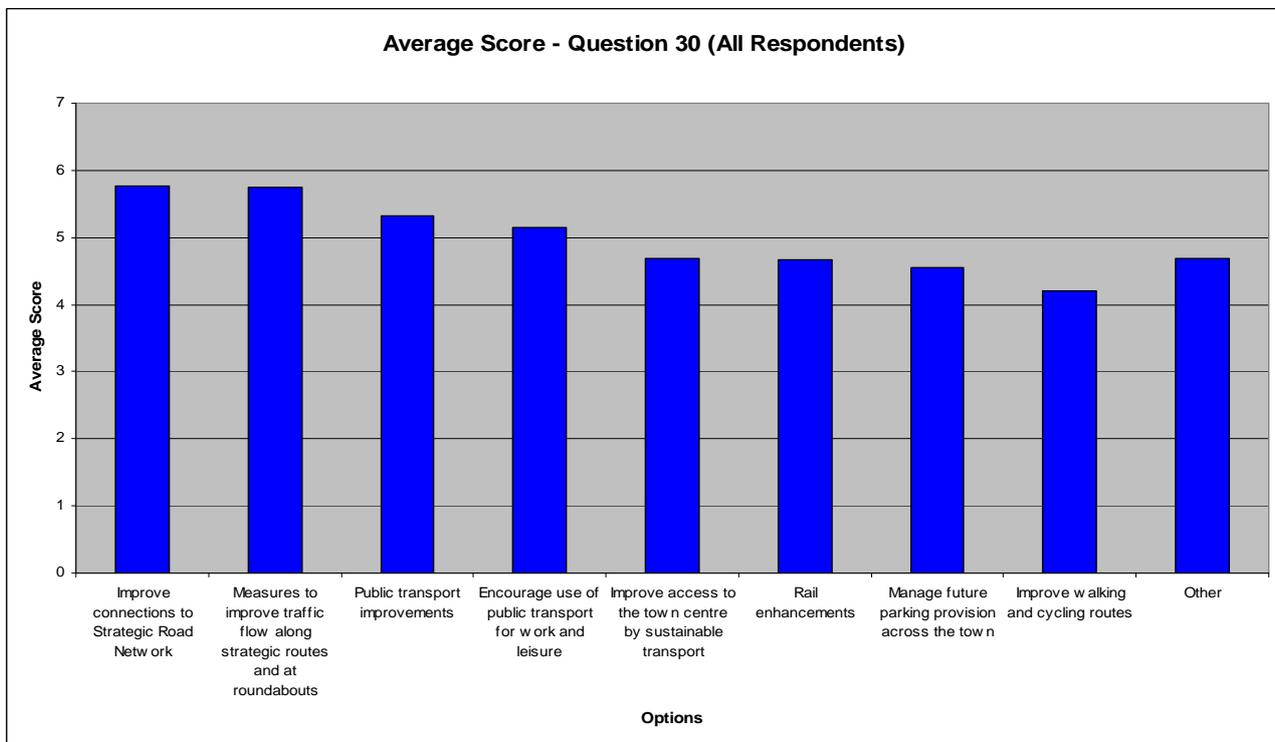
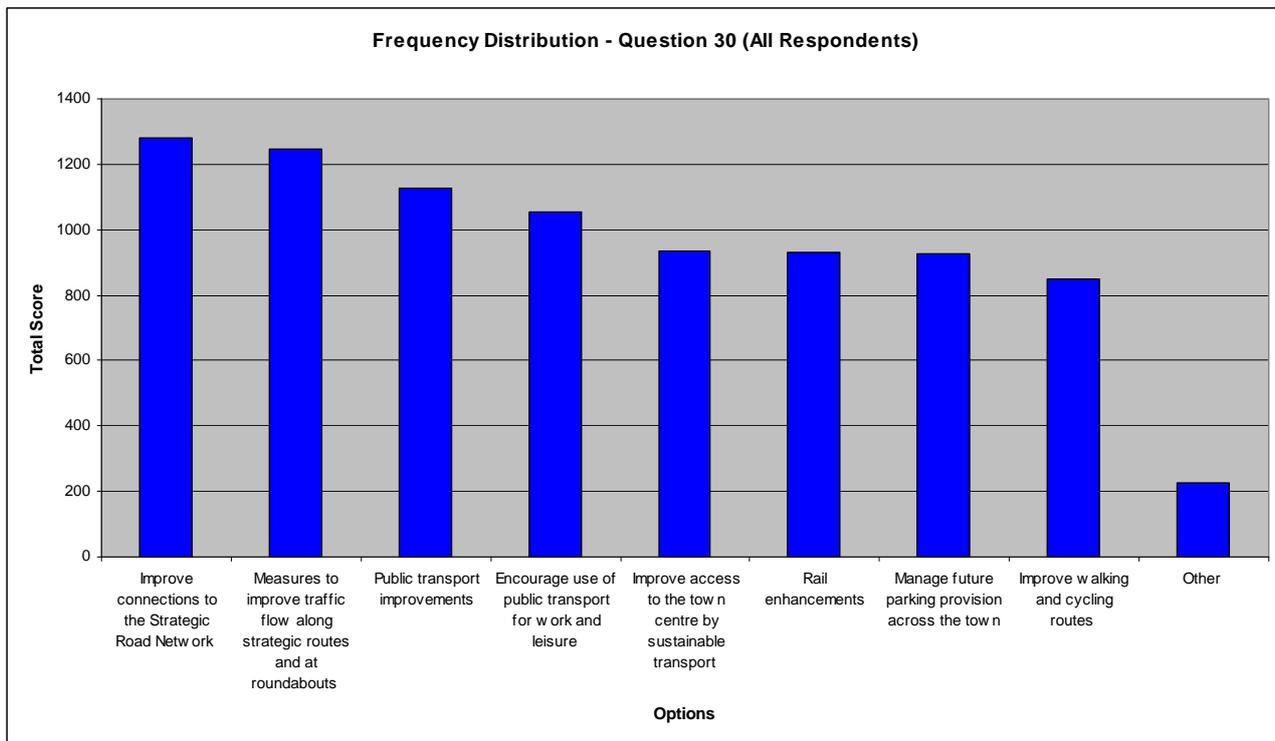
- Central Line Extension
 - If development occurs to the south of Harlow, we need to consider extending the underground from Epping.
 - Tube extension to junction 7a with park and ride.
 - A train linking Harlow Town Centre to the Central Line Station in Epping, providing direct access to employment opportunities being created in East London and also Canary Wharf.

- New Junction / Bypass
 - The Core Strategy should be explicit in the desire to promote better access to the M11 to aid both residential and employment growth. This is best achieved through the provision of a new motorway junction to the north east of the town.
 - North east access to M11 is required.
 - Moving traffic away from current A414 by building a new link that does not go through Harlow at all, connecting back onto the A414 before entering M11 directly.
 - An M11 link road to prevent grid lock of Harlow.

- The A414 shouldn't be extended east to M11 as it would destroy valuable recreation space along the River Stort.
- A414 needs to bypass the town.
- Delivery of growth should not become entirely contingent upon the provision of a motorway junction as much can be delivered in advance of that.
- Cycling
 - Cycle ways and footpaths and green infrastructure need to be considered.
 - Harlow urgently needs a cycle track from Harlow to Epping , Loughton.
 - Cycle routes need better maintenance of surfaces, removal of broken glass, etc.
- Potential for Modal Shift
 - Fuel costs are going to make a car based transport system increasingly uneconomic and the alternatives are non-existent, unreliable or overloaded.
 - The Council needs to be realistic about car use. Many people travel into the town for work and they cannot or will not use public transport.
 - Road traffic is the elephant in the room in respect of housing development.
 - The point should be to develop Harlow as a place for green living, not increase infrastructure provision.
 - Travel planning has reduced car use by 10% in some areas and should be rolled out across the town.
 - Harlow shouldn't rely on the findings of consultants who do not know the town.
- Social Infrastructure
 - Access to schooling and healthcare.
 - Improved housing and heating design upgrades.
 - More open parkland.
 - Hospital provision is overloaded.
 - Places of worship and culture (e.g. a new theatre)
 - A larger hospital is required and other social services.
 - Why is Harlow closing schools and building houses on sites and then needing more schools.
- Water and Sewerage Infrastructure
 - Sewerage and drainage infrastructure is overloaded.
 - Water supply and sewerage infrastructure should be in place before development commences.
 - Potential flooding is a concern.
 - Sustainable Drainage Systems. Core Strategy should be clear that Harlow has insufficient capacity in drainage network and any expansion of the town should address this issue, through SUDs
 - Rye Meads Water Cycle Strategy was not a detailed study and only provides suggested solutions. Several areas of concern remain unresolved.

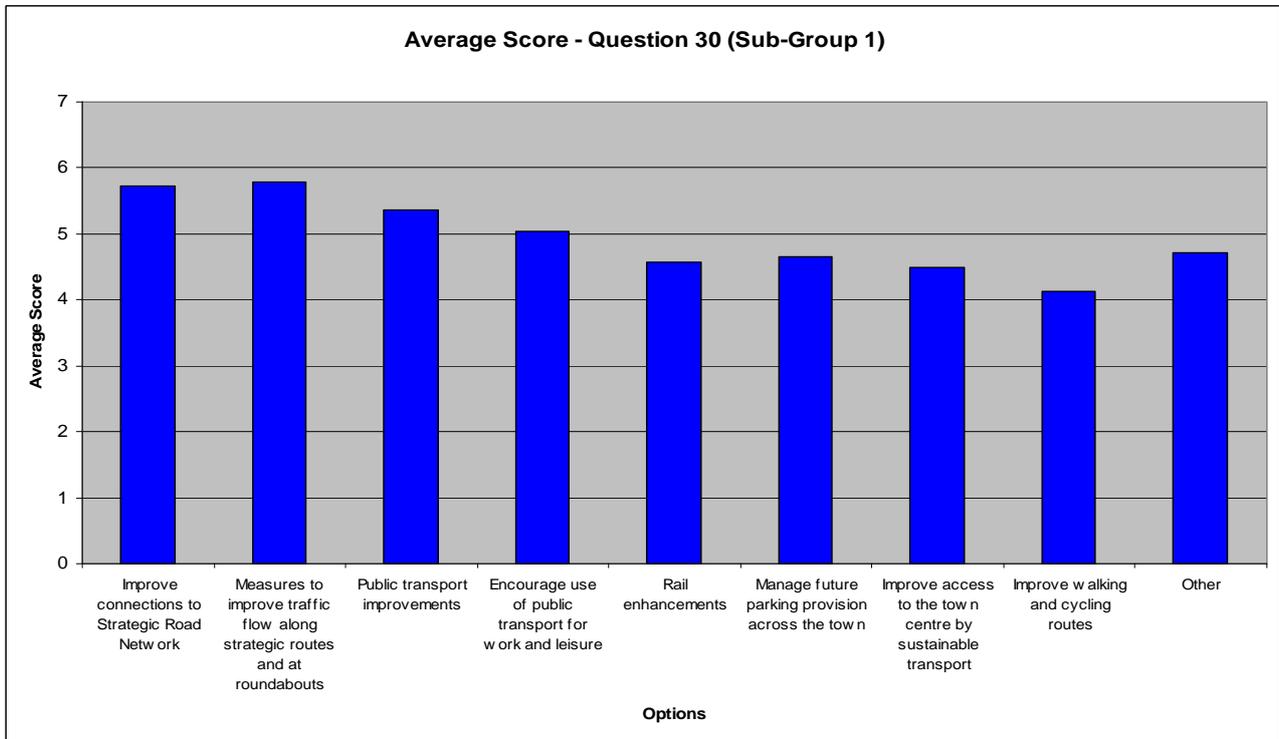
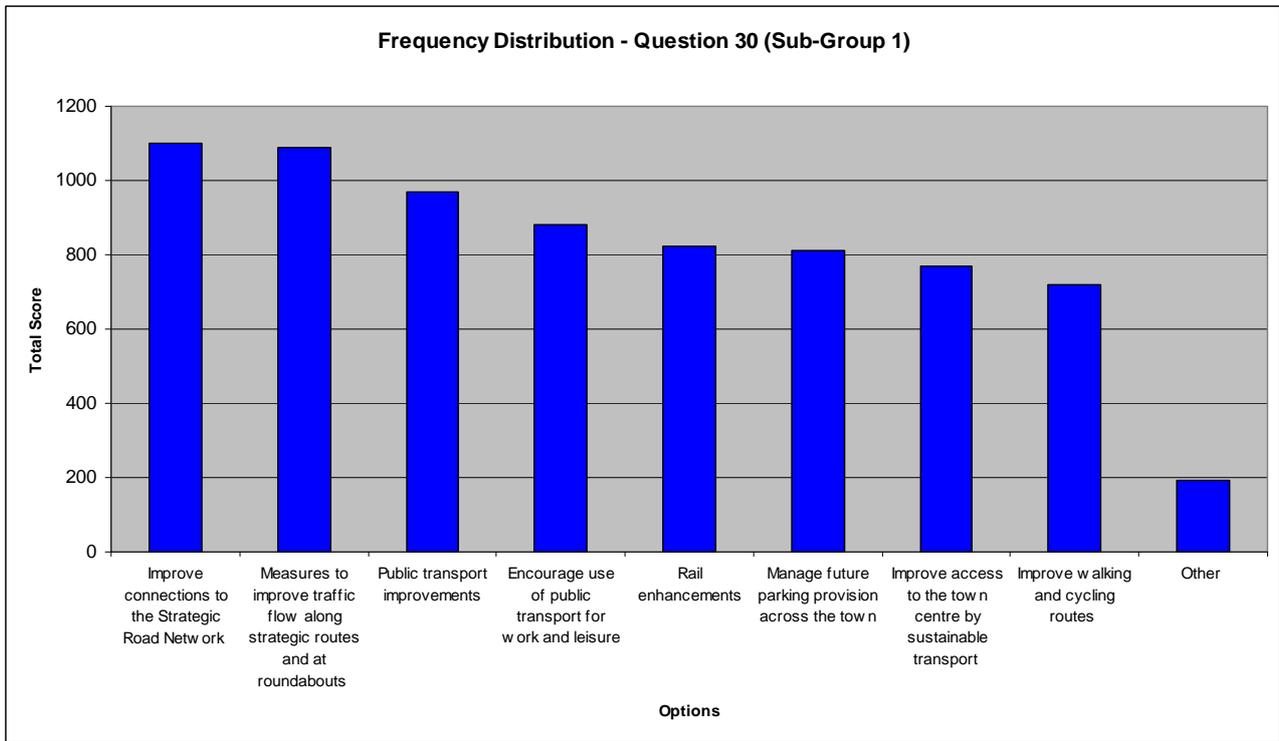
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

All Respondents



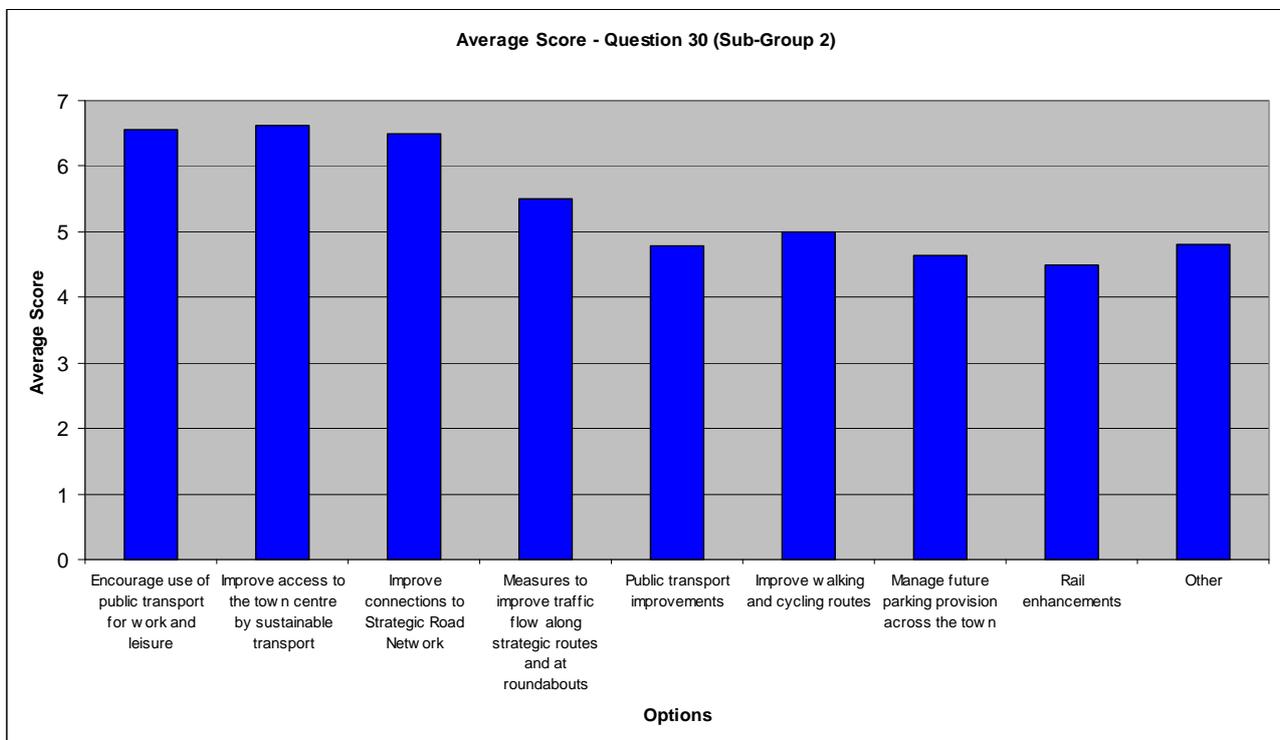
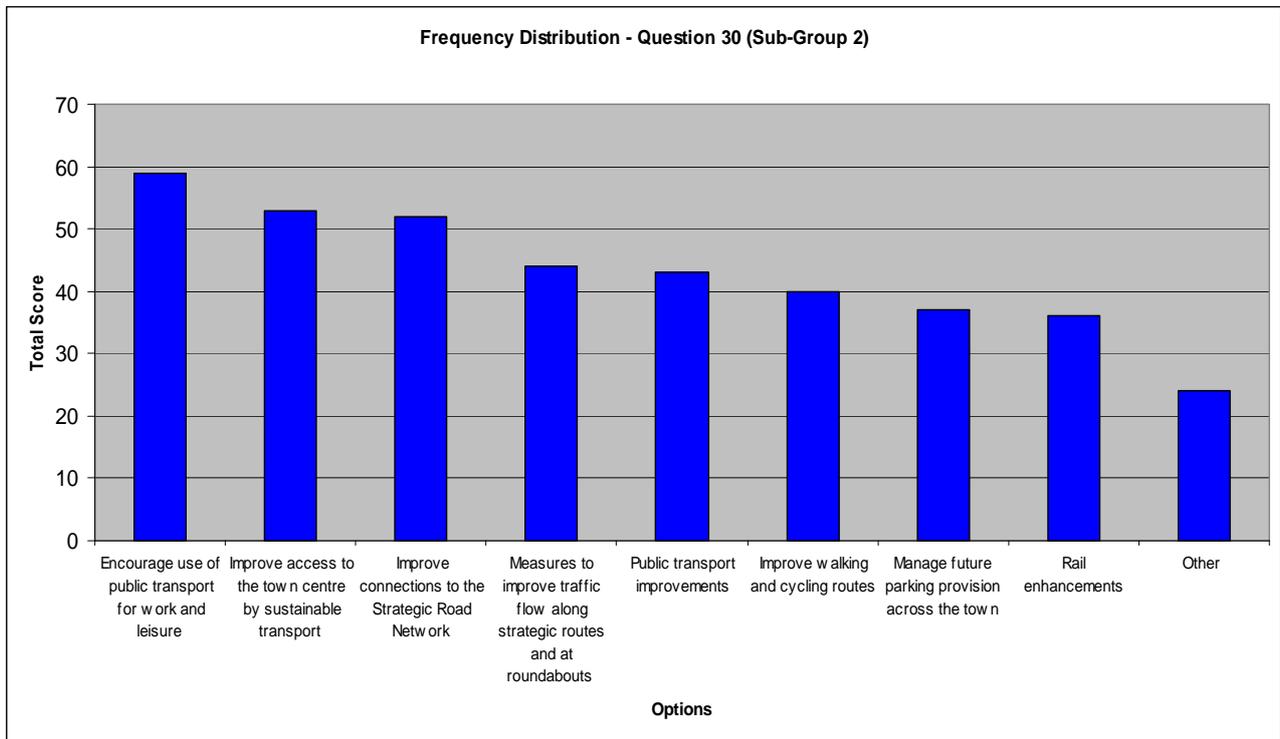
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

Sub-Group 1 – Harlow Residents + Community Groups



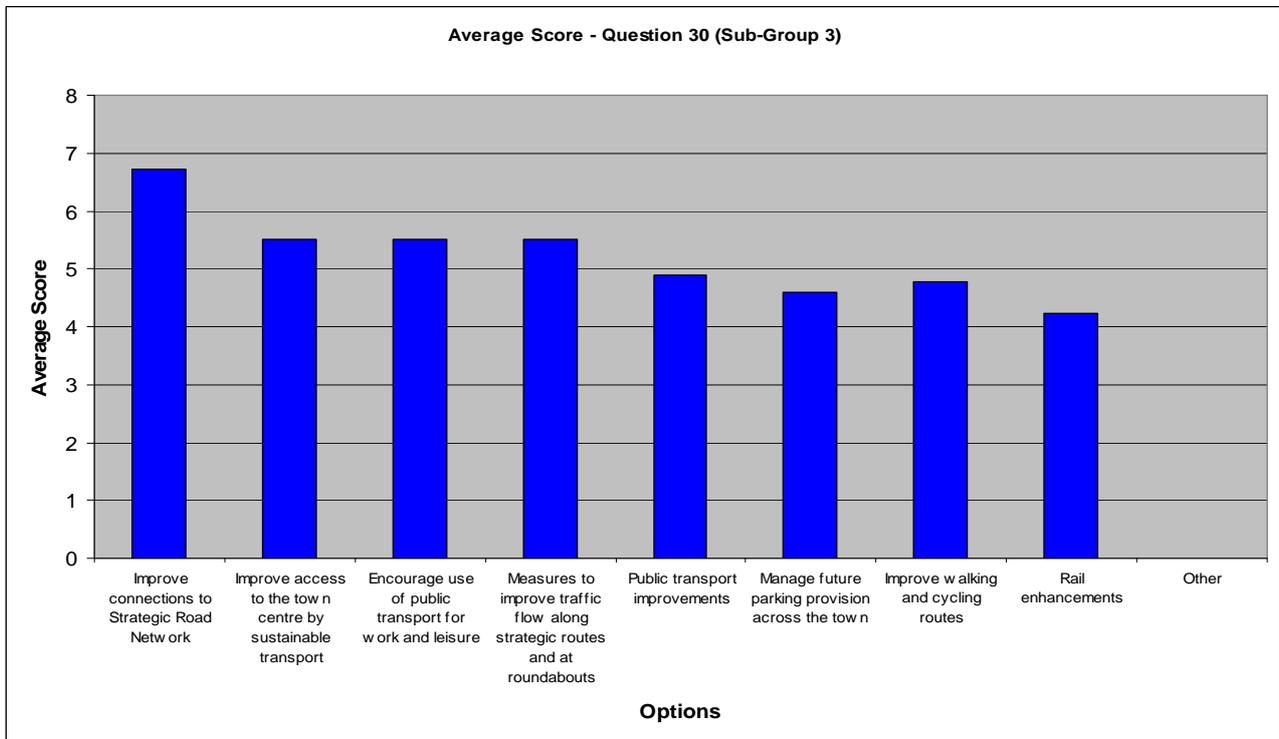
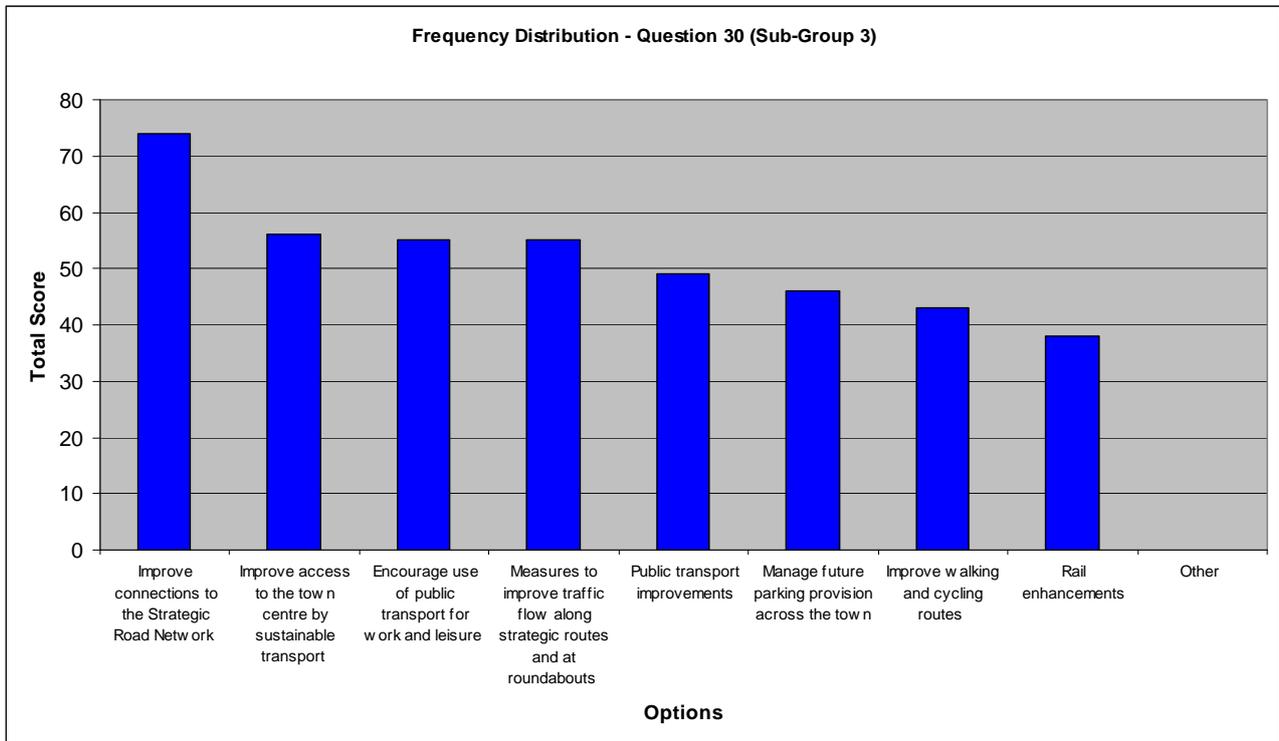
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

Sub-Group 2 – Statutory Consultees + Local Groups and Organisations



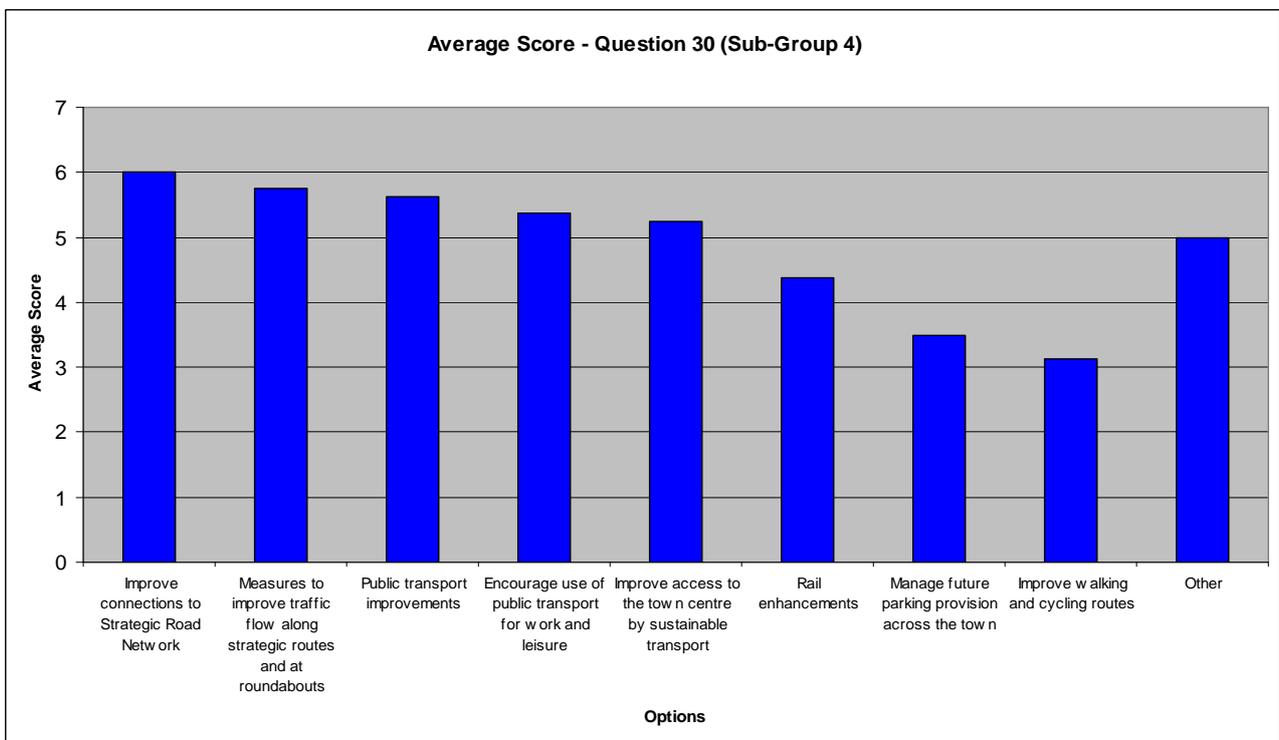
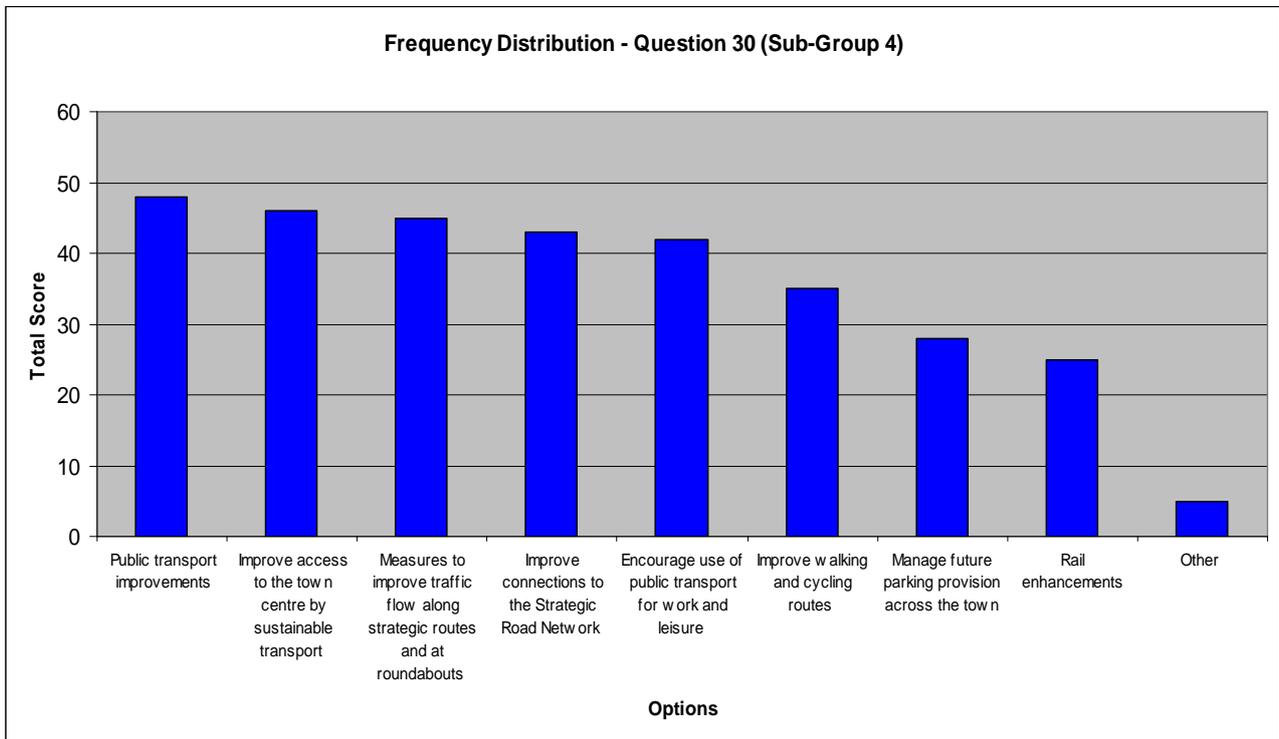
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

Sub-Group 3 – Adjoining Parishes Residents + Other Residents



Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

Sub-Group 4 – Local Developers + Planning Consultants/Agents



Question 31 – Do you have any further comments to make, at this stage, on how Harlow should be developed?

Set out below is a summary of the key issues raised by respondents in relation to this question:

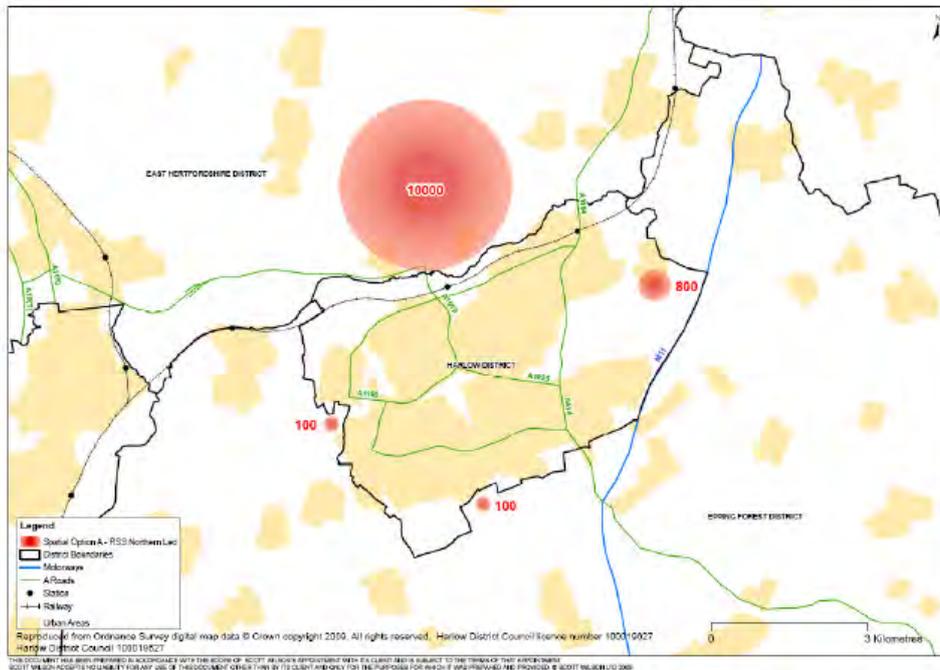
- Strategic issues
 - The implication of the revocation of the East of England Plan and the Localism Bill needs to be considered.
 - If the East of England Plan is revoked much of the evidence remains valid.
 - The Cala Homes judgement means the East of England Plan is still a material consideration.
 - Need for some modest development in Harlow but the infrastructure is inadequate for the level proposed.
 - There is a need for regeneration and new housing in Harlow balanced against the need to protect the countryside, Green Wedges and open spaces.
 - Justifying growth to secure infrastructure provision is flawed, reckless and unachievable.
 - Local needs should determine level of growth.
 - The growth proposed is essential
 - Using critical mass to justify development produces highly fragile growth.
 - Climate change and the impact of carbon emissions need to be considered.
 - Impact of ageing populations and of high density development on mental health needs to be considered.
 - Green Belt and Green Wedges should be protected from development.
 - The River Stort makes an important contribution to green infrastructure.
 - Developing Harlow as a major retail centre will add to congestion.
 - The development of the town should be based on Garden Cities principles and the Gibberd Plan.
 - The Council's previous plans have not reduced housing waiting lists or traffic congestion and have caused flooding, erosion of green spaces, the loss of the swimming pool and sports centre.
 - Development should take place in other towns rather than Harlow.
 - There is not enough space in Harlow to accommodate more people.
 - Regeneration is a top priority.
 - There is no clear mechanism to achieve regeneration.
- Cross Boundary issues
 - Harlow cannot allocate land outside its administrative boundaries
 - Expansion of Harlow can only be achieved with the agreement of neighbouring planning authorities.
 - It would be premature to propose locations for growth until East Herts. DC have considered their options.
- Development location issues
 - Harlow could expand to the west of Pinnacles and to the west and south west of Katherines where there are sustainable workplaces.
 - Harlow North is a better location for development as it is near rail links.
 - Harlow should expand eastwards including beyond the M11 to create new housing, retail, employment and leisure linked to a new junction to the motorway.

- Low density housing could be located at Essex Hunt Kennels with no visual harm.
 - Option C should be the preferred option.
 - Consideration should be given to Harlow Development Corporation's plans for the Tylers Cross area.
 - Development north of Gilden Way is opposed because of traffic and a range of environmental impacts that would occur as well as the impact on Old Harlow.
 - Development north of Harlow is opposed because of the impact on existing villages and on the environment.
 - Better use should be made of land within Harlow, including using land at the Hatches, adding extra floors to offices and flats with higher densities in the town centre and using empty employment land
- Infrastructure issues
 - Existing road, footpath and cycle path infrastructure should be improved together with a new junction to the M11.
 - Sewerage and water capacity needs to be improved and the impact of flooding needs to be considered.
 - Other community based infrastructure is needed including places of worship, schools and care provision.
 - Car parking provision should be increased to reflect the dependence of the car.
 - A park is needed for Old Harlow.

Consultant's Suggested Growth Options

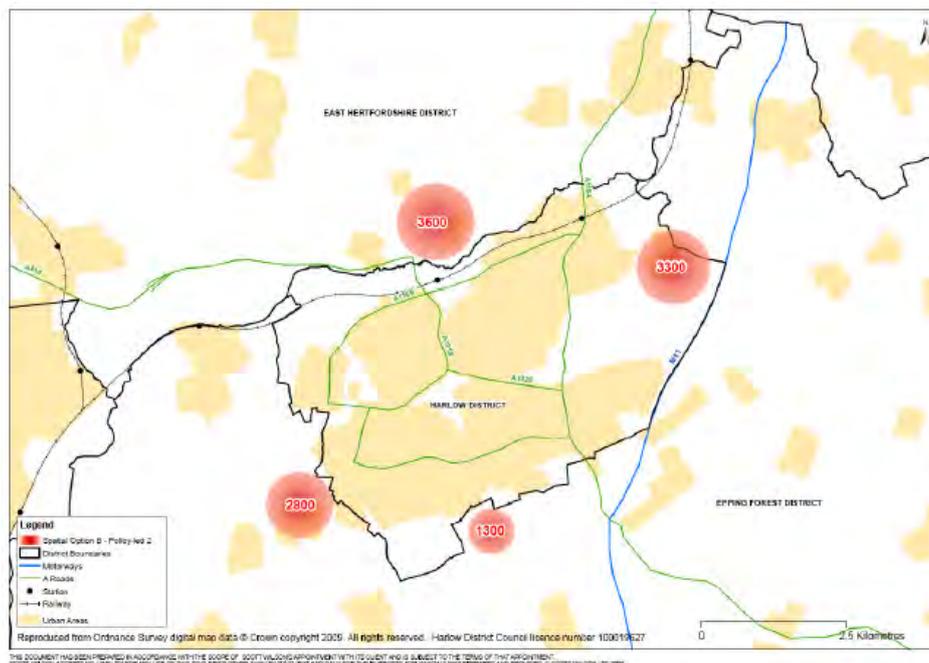
The consultant, Scott Wilson, tested five growth options. The full report can be viewed online at www.harlow.gov.uk/ldf (follow the link to 'LDF Evidence Base').

Option A – RSS: Northern-Led



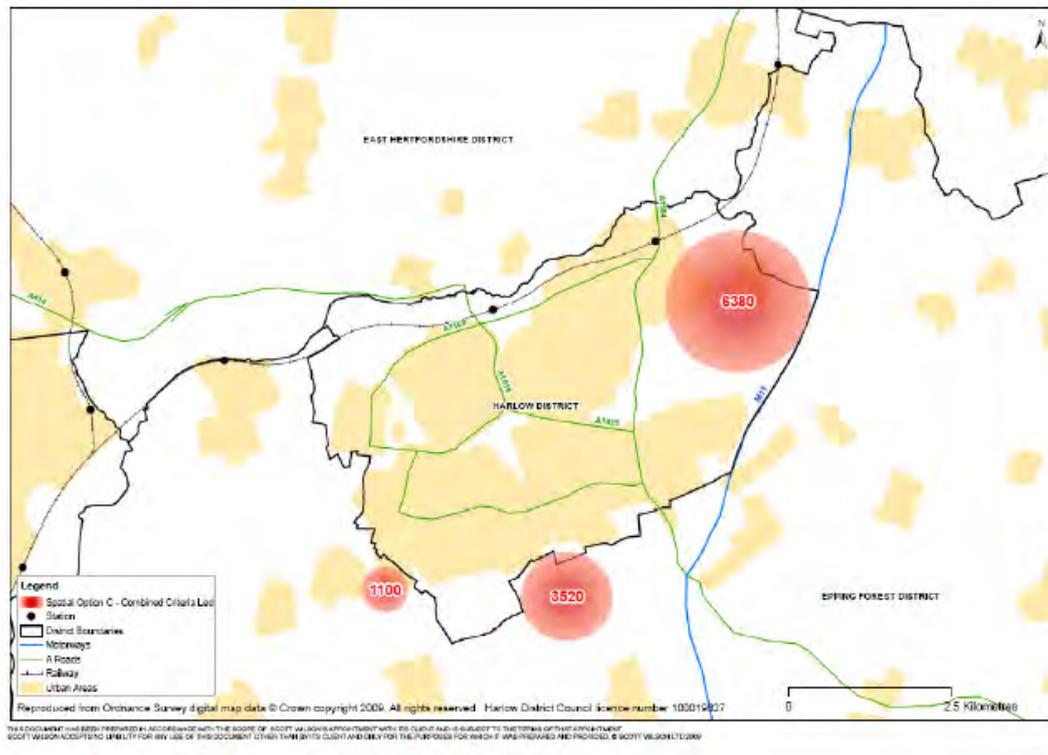
please note: distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

Option B – Policy-Led 2

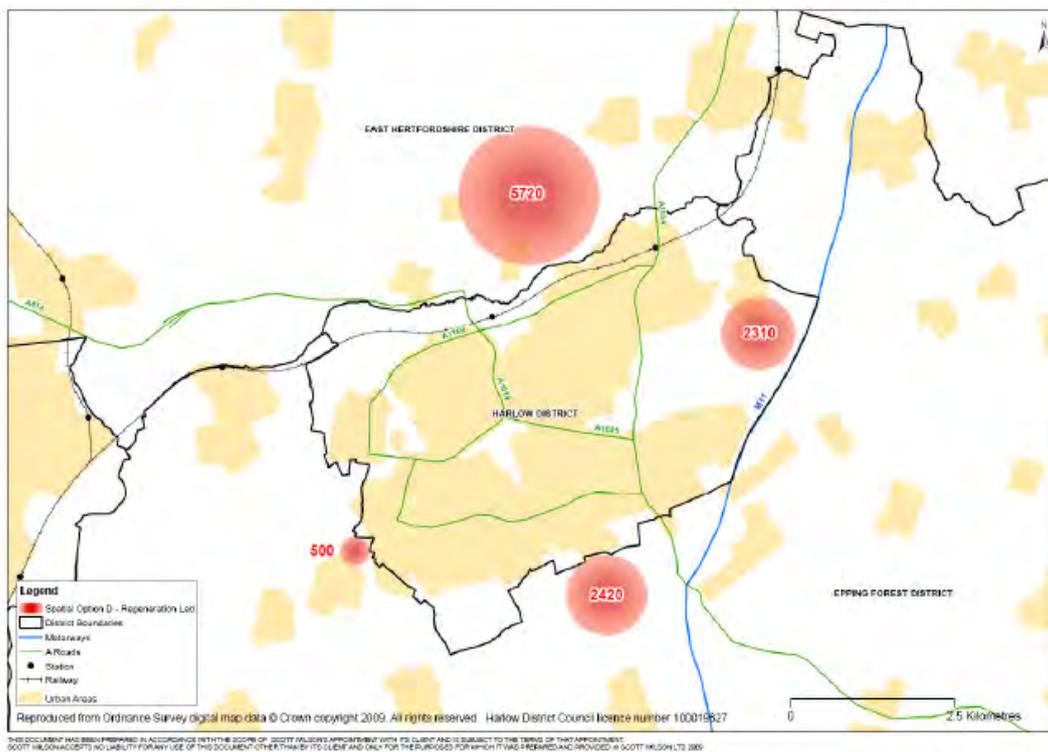


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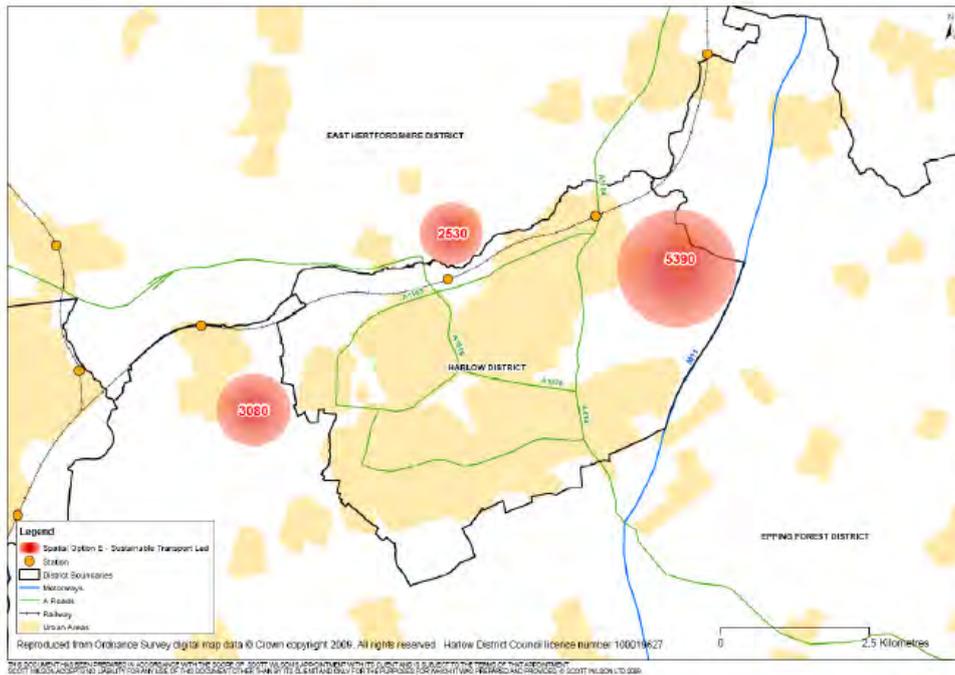
Option C: Combined Criteria-Led



Option D: Regeneration-Led

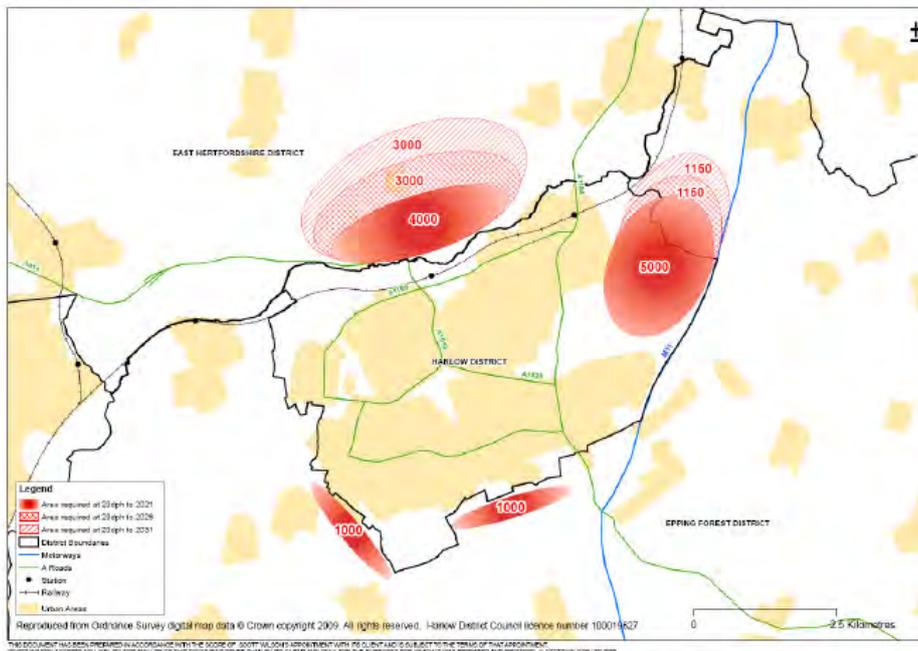


Option E: Sustainable Transport-Led



please note: distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

The Consultants' Suggested Spatial Approach



please note: suggested distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

Appendix 2 - Summaries of responses from 'Specific Consultees'

Appendix 2.0 Summaries of responses from ‘Specific Consultees’

This section contains summaries of the responses received from organisations identified as ‘Specific Consultation Bodies’ within the Council’s 2007 adopted *Statement of Community Involvement* (SCI, page 26). The full representations made by these bodies can be viewed on the Council’s website at <http://harlow-jdi.consult.net/ldf>

Table 3 sets out the Specific Consultation Bodies that responded to the consultation in alphabetical order. The summaries of their representations follow in the same order.

Responses received from Specific Consultation Bodies
1. East of England Development Agency
2. East Hertfordshire District Council
3. Eastwick and Gilston Parish Council
4. English Heritage
5. Environment Agency
6. Epping Forest District Council
7. Epping Upland Parish Council
8. Essex County Council (Environment, Sustainability and Highways)
9. Hertfordshire County Council (Environment and Commercial Services)
10. Hertfordshire County Council (Property)
11. Hertfordshire Biological Records Office
12. The Highways Agency
13. High Wych Parish Council
14. Hunsdon Parish Council
15. Little Hadham Parish Council
16. Much Hadham Parish Council
17. Natural England
18. NHS West Essex (Estates)
19. NHS West Essex (Public Health and Property)
20. Roydon Parish Council
21. Sawbridgeworth Town Council
22. Thames Water Property Services
23. Widford Parish Council

1. Summary of representation received from East of England Development Agency

- The East of England Plan is still the part of the adopted Development Plan and therefore decision makers should have full regard to this.
- Council should reinstate references to the Regional Strategy and including policy targets and key centres for development and change to ensure that it has relevant, appropriate and sound evidence to support its policies and the approach to its delivery and implementation.
- Harlow and its urban sub region and its hinterland are expected to disproportionately drive growth, given the importance of agglomeration and the concentration of assets. The strategic ambitions identified below and should be expressed in Harlow's Core Strategy.
 1. Support the expansion of important high value sectors such as pharmaceuticals, aerospace, and film production.
 2. ensure employment land and premises meet the needs of business and high growth clusters
 3. Invest in major transport corridors to tackle congestion and improve capacity, including rail routes to London, M11 and A1
 4. Improve connectivity within the arc, particularly the links between Harlow and Stansted
 5. Tackle shortages of affordable housing and housing for key workers as part of creating sustainable communities.
 6. Support measures to raise employment rates and the profile of higher value employment across the London Arc by overcoming barriers to employability and raising basic high level skills and participation in deprived wards
 7. Support further expansion of the higher and further education offer across the arc, focussed on key centres, including Harlow, to strengthen skills at NVQ3 and 4 sectors to facilitate progression to higher education that supports the arcs globally competitive position.
 8. Support the sub regional roles of key centres of development and change by recognising the reality of sub regional economies and the need to support the roles that they play within the region and sub region.
 9. Deliver a high quality and sustainable urban environment across the arc that supports historic assets, brings forward brown field sites for development and delivers new town regeneration.
- It is important that the strategy sets out clearly the economic aspirations for Harlow including the role and functions of its partners including adjoining authorities. There are considerable cross boundary issues relating to the growth associated with Harlow and EEDA would suggest that a spatial option should be included that refers more closely to the location and distribution of economic growth as well as housing growth.
- EEDA is pleased that the economic development of the district is identified as a major issue. Harlow has many implicit advantages in order to pursue the renewal and growth ambitions of the district.
- Support is also given to section 2.11 in respect of prosperity which gives a succinct and accurate over view of the issues experienced by Harlow. The complex socio economic factors require holistic policies to ensure that Harlow develops spatial options which are both realistic and deliverable.

2. Summary of representation received from East Hertfordshire District Council

- Maintains total opposition to any development north of Harlow, in East Hertfordshire District, for the growth of Harlow, as contained in the East of England Plan 2008.
- Considers it premature to base the Harlow Core Strategy on the East of England Plan 2008, in the light of the Government's intention to reform of the planning system embracing the localism agenda. It is now necessary to re-examine the case for growth north of Harlow from the bottom-up.
- Raises a number of concerns about Harlow Council's evidence base and advises that the evidence base be reviewed and updated in order for the Council to prepare a fully bottom up strategy for Harlow. These concerns need to be addressed prior to the development of a preferred approach. Specific concerns include:
 - The scope of much of the evidence base for the expansion of Harlow was limited by the top-down policy direction of the East of England Plan. There were a number of limitations in this work that need to be reassessed.
 - Harlow Council's evidence base is lacking in any fresh studies conceived outside the former government's framework. This is a major omission and some basis for an independent assessment agreed by both Councils is urgently required.
 - Harlow Council's evidence base does not provide any robust evidence either way linking growth to regeneration and affirms that the arguments for critical mass as a basis for regeneration remain unclear.
- The agreement of both Councils is necessary in order to proceed with any proposals for growth of Harlow into East Herts.
- East Herts. Council sets out the planning history in the lead up to the preparation of the East of England Plan and sets out its response to the East of England Plan. It also provides extracts of the Panel Report. East Herts. District raises concerns about how decisions regarding growth around Harlow were informed.
- Raises concerns about the conclusions of the options appraisal study and the determining role that the RSS policy had on selecting the preferred option for growth around Harlow.
- Prior to advancing their Core Strategy Preferred Options, Harlow Council should pay particular attention to how infrastructure is to be funded, in order to ensure that development and infrastructure are appropriately phased.

3. Summary of representation received from Eastwick and Gilston Parish Council

- Strongly object to major built development north of Harlow.
- Support limited housing north of Harlow in East Herts. to meet local needs in accordance with locally developed parish and town plans.
- Well before the adoption date of the Core Strategy there will no longer be a prescriptive development strategy for Harlow set out by national or regional planning strategies. Specifically, there will no longer be any need to distribute development in accordance with policy HA1 of the East of England Plan.
- The green fields north of Harlow are not suitable as a broad location to meet Harlow's housing requirements on sustainability, planning, environmental, social, infrastructure and economic grounds.
- The consultant's own work highlight that removing the locational constraint imposed by Policy HA1 it would appear that Option C is the preferred option.
- Eastwick and Gilston Parish Council sets out the planning history in the lead up to the preparation of the East of England Plan. It also provides extracts of the Panel

Report. Concerns are raised about how decisions regarding growth around Harlow were informed.

- Strongly oppose a review of the Green Belt to support the growth of Harlow to the north. East Herts. is no longer required to undertake a Strategic Green Belt Review as part of the LDF as the East of England Plan is to be revoked.
- Loss of Green Belt to the north of Harlow risks potential coalescence with other settlements.
- There are concerns over the deliverability of the infrastructure to support significant development on land to the north of Harlow.

The Economy and Jobs:

- There is no evidence to support the argument that housing growth north of Harlow will deliver the regeneration benefits sought in Harlow. The suggested benefits are all illusory or can be achieved in some other, less damaging way. The potential harm to the regeneration of the town caused by growth is likely to outweigh any benefits.
- There is little thought of the reuse of redundant employment land in Harlow ahead of developing urban extensions as advocated in PPS 4 Planning for Sustainable Economic Development.
- It is acknowledged that an element of growth is likely to be beneficial to the regeneration of Harlow, but not on the scale proposed. Other, more focused strategies, or indeed a robust regeneration strategy for the town, which currently does not exist, would better achieve the suggested benefits of growth for regeneration. The potential harm to the regeneration of the town caused by the proposed scale of new growth is considered to outweigh these benefits.
- Development of at least 10,000 dwellings with associated employment land north of Harlow will have long term damaging effects on the vitality of the market towns of Hertford, Ware, Sawbridgeworth and Bishop's Stortford as well as Harlow. The need to maintain the vitality and viability of market towns in East Herts. must be acknowledged in the Harlow Core Strategy.
- The idea that Harlow might become a sub-regional shopping centre is not supported. This would damage the local market towns of Hertford, Ware, Sawbridgeworth and Bishops Stortford. The notion that extra population north of Harlow will support the failing Harlow town centre ignores other changes in retailing practice (e.g. internet sales) and the counter-magnet retail outlets that have been created along the A414 within Harlow and along the A10.

Sustainability:

- The Sustainability Statement prepared by EERA for the East of England Plan Examination in Public concluded that the location [north Harlow] was in the highest category of sensitivity to anything more than development of 50-100 dwellings and was unlikely to accommodate the particular type of change without extensive degradation of character and value. Mitigation measures are unlikely to be able to address potential landscape/environmental issues.
- Growth needs in East Herts. and Harlow should be accommodated by maximising the use of existing infrastructure and services through organic growth of existing settlements and on brown field sites.

Infrastructure:

- Water, sewage, roads and other essential infrastructure cannot be provided to support the development north of Harlow within the short or medium term.
- The Harlow Regeneration Study has identified up to £354M current 'infrastructure deficit costs'. The growth agenda would add up to £474M as the public cost of growth excluding matters such as hospitals, water importation and water treatment. It is unrealistic to expect these costs to be met by Government in the foreseeable future.
- Development north of Harlow will place an undue financial burden on Hertfordshire authorities which already have an overwhelming infrastructure deficit resulting from other development pressures.
- There are likely to be considerable funding shortages for the required infrastructure. There is likely to also be a considerable miss match in the collection of funding (through all sources) and the need for the infrastructure.
- A northern by-pass was stated by EERA as "an absolute prerequisite to development north of Harlow. There is no prospect of such a by-pass.

Planning drivers

- There has been no proper consideration of the best future urban form for Harlow in the context of sustainability or urban function.
- The proposed release of Green Belt north of Harlow demonstrates there is no recognition of its role in conserving the carefully planned urban form of the New Town. It fails to appreciate that a key role of the Green Belt is to prevent coalescence of settlements and it is most surprising that, given the need for regeneration in Harlow, there is no understanding that it is there to encourage regeneration rather than take the easy green field option which allows obsolescence to remain in the town.
- The Green Belt should be expanded to recognise the need to contain pressures which will otherwise result in the coalescence of settlements from Harlow northwards to Bishop's Stortford.

Stansted:

- This is the wrong place for a major development and this location was rejected by SERPLAN for this reason.
- Despite the constraints now placed on the Airport's development, to deliberately place thousands of new homes north of Harlow, where they will be subject to noise, inconvenience, pollution and potential danger of a rapidly increasing number of landing aircraft.

Environmental concerns:

- Harlow Area Landscape & Environment Study states (page 9) "*Avoid intrusive development on the visually prominent open ridges and slopes around High Wych that are important as the countryside backdrop to the setting of Harlow*" and (page 10) the "*Desirability of retaining the rural character of largely undeveloped/open countryside to the north of the Stort Valley, and avoiding an increased sense of urbanisation through erosion of individual identity of rural settlements and their dispersed pattern within the landscape*"
- The following study data seems to have been disregarded by the consultants:

- Land to the north of Harlow was considered to be the most sensitive (compared to south, east or west) (A Study of the relationship between Transport and Development in the London-Stansted-Cambridge-Peterborough Growth Area- Colin Buchanan and Partners & GVA Grimley, August 2004 commissioned by ODPM)
 - The Landscape Character Assessment north of Harlow is one of 'conserve and improve' (Hertfordshire County Council landscape assessment)
 - The Harlow Green Infrastructure Plan emphasises the important environmental, historic and landscape role of the Stort valley and encourages the implementation of the Gilston Great Park Plan.
- Development to the north of Harlow would have a serious impact on 16 County wildlife sites, 3 Scheduled ancient Monuments, 6 areas of Archaeological Significance and a number of historic gardens, especially on the Gilston estate.
 - Any development north of the Stort valley and A414 will breach important thresholds and result in a loss of control of further development.

Gilston Great Park:

- The STOP Harlow North Campaign is promoting land to the north of Harlow for an "actively managed countryside" as an alternative to housing development. We look forward to support from Harlow Council for Gilston Great Park to become an essential part of the future planning framework for the area.

4. Summary of representation received from English Heritage

- Harlow has a significant and distinctive New Town character.
- This provides an opportunity for Harlow to regenerate itself in a distinctive way.
- Further characterisation and appraisal of Harlow's heritage should be carried out as part of the supporting evidence base. This should also inform the sustainability appraisal.
- The characterisation and appraisal of Harlow's heritage should focus on:
 - Market Place and West Square in the Town Centre;
 - undesignated neighbourhoods and their landscape settings; and
 - Pre-new town features.
- Where appropriate, designation or extension of conservation areas may be justified.
- English Heritage recommends the preparation of a Local List of buildings of architectural or historic interest.
- The Town Centre is of importance in defining the character of Harlow, especially in the case of Market Place. Its heritage value should be a key factor in its future development. Assets such as Market Place could be designated as conservation areas.
- Green Wedges are an important element of the Gibberd principles in laying out Harlow and should be protected from future encroachment.
- English Heritage generally concurs with the preferred option for expansion.

Specific advice is provided on sections of the document in the main representation.

5. Summary of representation received from Environment Agency

- The Environment Agency is disappointed that Harlow's Core Strategy has not fully addressed environmental issues.
 - There's no mention of climate change mitigation and adaptation.
 - There's no reference to groundwater protection;
 - There's no reference to contaminated land or implications of redeveloping land affected by contamination.
 - The Water Framework Directive has not been mentioned at all.
 - Biodiversity has not been mentioned, in particular around the Stort Valley.
- There is a need to achieve good ecological status in all water bodies and ensure no deterioration.

The Stort Valley and Cannons Brook:

- The Core Strategy should aim to enhance the Stort Valley - a critical biodiversity resource in the area containing BAP habitats, wetlands including, floodplain grazing marsh and wet woodland.
- Pollution of Cannons Brook should be addressed as it is affecting the status of Hunsdon Mead SSSI (see Hunsdon Mead Diffused Water Pollution Plan).
- The Meads adjacent to the River Stort provides an important function for climate change adaptation, flood risk, biodiversity and water quality.

Green Wedges:

- Harlow *must* consider underused open space and other undeveloped land for development before considering releasing land in the Green Belt.
- Several of the Green Wedges provide flood alleviation benefits and it's important that these areas are kept free from development.
- Development on these Green Wedges may increase the flood risk elsewhere and have a negative impact upon local biodiversity.

Flooding:

- The expectation is for all plans to achieve and go beyond the aims of PPS9, PPS23 and PPS25.
- This means that flood zones 2 and 3 are avoided, contaminated land is remediated and groundwater protected.
- Buffer strips are required adjacent to water bodies to allow for biodiversity, to reduce flood risk and improve water quality.
- Sustainable Drainage Systems are required for new development as they provide benefits in terms of flood risk, biodiversity and water quality.

Evidence Base:

- Strategic Flood Risk Assessments should be used with the sequential approach taken to site selection.
- The Rye Meads Water Cycle Strategy (RMWCS) highlights the limitations and time restrictions linked to development in Harlow.
- The Harlow Green Infrastructure (GI) Plan should be used to inform where there are links and deficiencies in GI provision.

- Local Authority's have a duty to have regard to the River Basin Management plan for their relevant catchment.

Infrastructure:

- Harlow has insufficient capacity in its drainage network and any expansion of the town should address this issue (RMWCS).
- Sustainable Drainage Systems are essential to restrict run-off rates.
- Scott Wilson's comments on limitations of certain spatial options with respect to infrastructure cannot be ignored.
- Any development to the east will rely on a sewer upgrade to Rye Meads STW.

Water Efficiency for New Development:

- The Rye Meads Water Cycle Strategy indicated all new homes should be built to a minimum water efficiency of 105 litres per person per day.

Climate Change Mitigation:

- Measures are required to reduce carbon emissions. These would include energy efficiency and green transport plans.
- Adaptation measures will be needed to cope with the consequences of changing temperatures, increased storm frequency etc. Measures include water efficiency, SuDs, resilience, sustainable construction and buffering of wildlife sites.

Spatial Options:

- Options A-E and the suggested approach could all be acceptable provided they are the most sustainable locations and are designed to ensure sustainable development.
- The right assessments must be used to inform the chosen option.

Suggested Amendments:

Natural England recommend that "The Environment" should have its own section: "Environment – enhancing and protecting land, air and water."

These are the elements that we feel should fall under the environment theme.

- 1) To protect and enhance green infrastructure.
- 2) Deliver most sustainable developments.
- 3) Safeguarding Floodplain.

Core Strategy policies are required covering the following issues:

- Green Infrastructure
- Water quality – e.g. from the impact of any new development.
- Adapting to climate change – e.g. through appropriate design measures including, landscaping and drainage.
- To mitigate flood risk by applying the sequential test approach to avoid development in areas at risk of flooding.

6. Summary of representation received from Epping Forest District Council

- Issues which should be included are: The strategic role of the Green Belt, and the related policies of the adjoining authorities; The wider landscape setting of the town, including in particular the southern ridge line; The lack of alternatives to the option of 16,000 houses; More prominence to climate change and more commitment to carbon reduction, energy efficiency and renewable energy.
- Regeneration of Harlow is supported. RSS evidence should be reconsidered, with other growth options for consultation.
- Vision should account for equivalent documents from adjoining authorities.
- Need for formal coordinated working with adjoining Districts.
- Strategic objectives should be broader than the town itself, encompassing the two adjoining Districts. Thus the function of the Metropolitan Green Belt, the landscape setting of the town, climate change and methods to reduce or mitigate its impact should be included. "Delivery" of regeneration will require the co-ordinated input of a wide range of authorities and agencies, so joint or co-operative working should be a theme of the Core Strategy with related strategic objectives.
- Strongly supports a review of the Green Wedges.
- The employment needs of the wider area (i.e. at least the two adjoining authorities) should be included in any assessment. This Council would be concerned about any extension to the Pinnacles, and would need to consider employment land provision in the urban extensions.
- The retail strategy proposed in the consultation document is appropriate for the town as a sub-regional centre, and in terms of protecting the role of the neighbourhood centres and hatches.

Consultants Option A:

- This Council favours this option over all the others. The greatest part of the growth will be close to the town centre, railway station and two of the main employment areas (The Pinnacles and Templefields). There will be minimal intrusion into the Green Belt in this district and no threat to the southern ridge line. The option does require significant new road infrastructure.

Consultants Option B:

- The Council agrees that it would be difficult to accommodate this level of growth to the west without significant adverse effect on the character of the area (including settlement coalescence with Roydon), but also feels that the southern ridge line could be threatened. The consultants' concerns about encouraging increased use of the car are shared by the Council.

Consultants Option C:

- This option is wholly unacceptable to this Council. The ridge line would be completely breached. Not only would there be significantly increased traffic using J7 of the M11, but there could be pressure for a southern bypass to Harlow. A new junction 7A will be needed to cope with the proposed eastern expansion.

Consultants Option D:

- Unacceptable to this Council because of the impact to the south. If a substantial part of the southern allocation could be re-located to the east, this could be a

reasonable option from this Council's perspective. The northern distribution, and the readjusted eastern total, would be likely to require road infrastructure.

Consultants Option E:

- The Council agrees with the consultants that this option is liable to lead to settlement coalescence with Roydon, which is wholly unacceptable

Consultants Suggested Approach:

- This addresses most of this Council's environmental concerns, but there are still potential problems with the southern ridge line. The south and west allocations are not strongly related to Harlow's town centre, the main employment sites or the railway station, so this could increase car commuting.
- There is concern that only one growth option is being presented for consultation. Other reasonable alternatives should be considered, to satisfy the requirements of PPS12. There is a need for joint or co-ordinated working at Member as well as officer level, and this should encompass the two County Councils as well as the adjoining authorities.
- The infrastructure needs of the adjoining authorities should be considered in the context of the urban extensions.
- Agree that new development should be directed to areas that will maximize regeneration, but with the proviso that potential impact upon adjoining authorities must be taken fully into account.
- Agree that underused open spaces and undeveloped land should be considered before releasing Green Belt, but this will also depend on whether the spaces have other, currently unrecognised value, e.g. for wildlife or informal recreation.
- there is a need for joint or co-ordinated working at officer and Member level of all the authorities, including the two County Councils;
- The Options consultation needs to include other reasonable alternatives
- The RSS targets and assumptions need to be re-examined, to establish whether the target of 16,000 homes is the right figure.

7. Summary of representation received from Epping Upland Parish Council

- Provision should be made for the effect of traffic outside of the main Harlow area
- Preference for Gypsy and Travellers sites to have access to Harlow's amenities
- Development should be on the vacant spaces including brownfield sites which are already available within Harlow before expanding outside the town's administrative area.
- Need to protect the Green Belt around Epping Green as it forms a strategic gap preventing Harlow and Epping from merging and any development in this location would impact upon the openness and function of the Green Belt

8. Summary of representation received from Essex County Council (Environment, Sustainability and Highways)

Social Infrastructure:

- Sections on infrastructure should include a wider range of social and physical infrastructure, in addition to transport.

- Early Years, Child Care, Primary and Secondary schools as well as post sixteen and other forms of education need to be recognised.
- Primary school numbers are forecast to increase in Harlow.
- Health, police and fire services and facilities also need to be considered, along with strategic utilities e.g. Rye Meads Sewerage Services.
- Growth in Harlow will have a significant impact on the provision of social and physical infrastructure.
- Prior discussion with Essex County Council is required to before determining the preferred spatial approach.

Funding Infrastructure:

- It's unrealistic to expect all infrastructure requirements to be provided for by partners particularly in the current financial climate.
- Other funding mechanisms may need to be utilised. e.g. CIL

Regeneration, Transport and Accessibility:

- Accessibility to strategic centres such as London and Stansted will enhance regeneration and investment potential within Harlow.
- The town centre needs to be well connected and accessible by a range of transportation modes.
- It is important to improve cycling and walking networks in Harlow, with a focus on safer routes to schools.
- The public transportation section should reference Harlow Bus Station.

Climate Change:

- Climate change and the need to reduce carbon emissions needs to be addressed.
- There is no reference to climate change, low carbon and renewable energy, or water efficiency.

Historic Environment:

- The historic environment should also shape pattern of growth and is important in terms of place making.
- Policies on historic environment should cover designated and undesignated heritage assets (see PPS5).

Minerals and Waste:

- Existing and future minerals and waste needs should be covered.
- Harlow Mill Rail Depot is a strategic mineral activity in the West of Essex and is safeguarded in the adopted Essex Minerals Local Plan (and is proposed to be safeguarded in the Minerals LDF).
- Land uses adjacent to the depot should be compatible.

Housing:

- There needs to be housing for all socio economic groups throughout Harlow.

- Currently there is a lack of accommodation for professional and higher income households.

Localism Bill:

- When the RSS has been repealed, Harlow will need to work in partnership with neighbouring local planning authorities to determine the amount of new housing required.
- In doing so it will have to take into account the evidence base prepared for the East of England Plan and national policy.

Sustainable Community Strategy:

- Harlow's current Sustainable Community Strategy vision is insufficient to provide the basis for the Core Strategy.
- The Core Strategy needs a more locally distinctive vision focusing on the key spatial planning issues facing Harlow.
- The review of Harlow's SCS needs to involve collaborative working between all stakeholders.

Rural-Urban Fringe:

- Gibberd highlighted the importance of Harlow's landscape setting and Green Wedges.
- This was recognised in Policy SS8 of The East of England Plan.
- Given the potential urban extensions, its surprising this issue isn't covered.
- A Core Strategy Policy on the rural-urban fringe is needed covering:
 - character and appearance;
 - Recreational and biodiversity value;
 - The role of proposed urban extension(s) in delivering networks of green infrastructure linking Harlow town and the countryside.

Prosperity / Retail Hierarchy:

- Gibberd Masterplan emphasises the important role of the central town centre, accompanied by three major neighbourhood centres and a series of local centre (hatches).
- Harlow should consider how the principles of Gibberd Masterplan may continue to influence the urban form and character of Harlow (and proposed urban extensions).
- PPS4 requires a clear network / hierarchy of centres to be defined.
- It should be clear how growth in centres will support regeneration.

Town Centre & Regeneration:

- Role and function of Harlow Town Centre is crucial to regeneration of Harlow.
- It's also important to ensuring growth at the centres improves the quality of lives for the deprived communities.
- Growth of Town Centre will require collaborative working with neighbouring authorities and ECC to ensure sub regional role for Harlow Town Centre is recognised and appreciated.

Prosperity – Promote Health and SME's:

- Harlow has a strong health care related economy.
- Policies are required to promote growth within this sector.

Employment Sites:

- Review of employment sites has to take place and it is important that this is robustly undertaken.
- PPS4 states unimplemented employment allocations shouldn't be taken forward unless there's:
 - Evidence of need; and
 - Prospect of delivery.
- If not, alternative uses should be considered.
- Employment review should examine attractiveness of Harlow for investment and how to enhance its attractiveness.
- Review should consider connectivity to the strategic road network and congestion from local employment sites.
- It should consider whether highway improvements could enhance connectivity and accessibility to employment sites.

Densities:

- PPS3 and PPG14 cited as basis for developing policies on densities.

Green Belt Release:

- PPG2 and PPS3 oblige Harlow to maximise use of existing urban area before considering sites in Green Belt.
- Priority should be to maximise regeneration benefits for existing urban area and communities.

Green Wedges:

- Review of Green Wedges should provide a modern definition.
- Green Wedges could function as access corridors for pedestrians, cycling, walking, and passenger transport.
- The design of Green Wedges in urban extensions is important.

Where should development be directed?

- A clear criteria is needed to determine locations for growth and show why decisions have been taken.
- The criteria in the questionnaire is not exhaustive. The following should also be considered:
 - Contribution reducing carbon emissions.
 - Accessibility to the strategic road network.
 - Deliverability
 - Scale of development needed to support infrastructure

Spatial Options for Growth around Harlow:

- Location of growth needs to reflect capacity of existing infrastructure.
- It should also reflect feasibility and deliverability of physical and social infrastructure services and facilities.
- A threshold of development is required to sustain certain education and care facilities and services.

Option A:

- Large dwelling allocation to the north fails to utilise existing educational capacity, particularly primary schools.
- There may be viability issues for care facilities and transport.
- Robust mechanisms are needed to highlight the timing and scale of infrastructure required and its delivery and funding.

Option B:

- Distribution of growth in this option is undesirable.
- Demand generated may overwhelm secondary school provision without providing sufficient critical mass to justify a new school in any single location.

Option C:

- This option is likely to require a secondary school.
- However, it fails to utilise the expansion potential at Mark Hall School.
- Passmores and Stewards Schools will struggle to accommodate growth.
- Development east should be strongly linked to existing public transport interchanges e.g. Town Centre and Harlow Mill Station.
- Proximity of growth to the M11 may encourage private car use.
- Concerns about significant development south of the town and impact on the existing highway network, particularly Southern Way.
- The residential nature of this route means it does not have the capacity to accommodate significant levels of growth.

Option D:

- Growth would utilise existing capacity in educational and care facilities.
- But in some cases educational and care facilities would be at capacity.
- Development does provide sufficient threshold to deliver new educational and care facilities.
- But proposed level of growth within the south of Harlow is likely to generate significant traffic congestion on Southern Way which is difficult to accommodate.

Option E:

- Concerns about the potential negative impact on the local transportation network within Harlow.
- Will require careful consideration regarding the provision of educational and care facilities and services;

- It may require two secondary schools, and with the secondary school in the north requiring 4 forms of entry.
- However, ECC is likely to question the viability of a four form entry secondary school.
- Option E will require additional educational and care capacity in the east of Harlow. But a second school to the east of Harlow is likely to make utilising expansion potential at Mark Hall challenging.

Consultant's suggested approach:

- From an educational and care service perspective the consultants suggested approach up to 2021 has similar drawbacks to those highlighted in spatial option E.
- But additional growth up to 2031 would make both new secondary schools viable.
- From an educational and care service perspective it is preferable that the northern extension is delivered prior to the east Harlow extension - providing critical mass for new services earlier in the plan period.
- Expansion potential at Mark Hall may be utilised for limited early growth to the east.
- ECC strongly recommends that the precise phasing of the growth within Harlow is properly considered, to ensure that social infrastructure can support Harlow's community.
- Consultants suggested approach does address some of the key transportation and highways issues, particularly those associated with development at the north and east of Harlow.
- Cumulative impact of growth within the south and southeast of Harlow there is likely to be a significant impact on Southern Way.

Congestion:

- This question is relevant to Harlow's key issues but the way in which it has been expressed is incomplete.
- The potential solution to congestion will require a combination of approaches some of which are not acknowledged.
- Some of the approaches fall within the scope of the Core Strategy process, but others will be implemented through other strategies, plans.

Evidence Base:

The County Council recommends that the Core Strategy includes the following within the evidence base:

- 1) Childcare Sufficiency Assessment,
- 2) Children and Young People's Plan; and
- 3) Essex School Organisation Plan - in particular policy B10 – Guidelines for School Planning.

The LDF is should be supported by historic environment evidence.

A Historic Characterisation Study for Harlow may be utilised to inform policy and shape the spatial distribution of future development (see PPS5).

9. Summary of representation received from Hertfordshire County Council (Environment and Commercial Services)

Growth Levels:

- The approach taken towards the level of growth in the Issues and Options is flawed. By the time the Core Strategy is adopted there will be no nationally prescribed growth levels for Harlow. Appropriate growth levels will need to be determined locally based on an appropriate evidence base and engagement of public and stakeholders.
- The Council will need to identify, assess and seek views on a range of alternative housing and economic/employment growth levels and spatial options for accommodating the level of growth. This will need to be addressed in subsequent stages of the Core Strategy preparation process for the Core Strategy to satisfy PPS12 requirements.
- Reinforced position that there should be staged approach to regeneration and growth at Harlow. Rather than an aspiration growth agenda from the outset, there should initially be a concentration on regeneration accompanied by a moderate level of growth. Only when that strategy has proven to be successful should one move on towards a strategy aimed at more aspirational growth levels.
- There is a need to take a fresh look at what realistic options there may be for economic and job growth aspirations for the town, present the rationale for these and seek views. This approach should look at a closer housing/jobs alignment than the RSS and that considered in this issues and options consultation.

Growth locations:

- When the Regional Strategy is abolished there will no longer be any spatial prescription on where any growth around Harlow should be directed. This removes any requirement to direct substantial growth to the north of Harlow.
- The County Council has previously expressed reservations about the Options Appraisal. These comments still stand and have been attached. Furthermore, the County Council's recommendations in relation to how the Core Strategy process should go about assessing growth outside the perimeter of the town do not appear to have been addressed.
- The County Council will expect the ongoing Core Strategy preparation to consider all options at each broad location for growth (around Harlow) and fully assess all natural and built environment assets, infrastructure constraints and requirements. Until such time as that intelligence is compiled and presented the County Council will reserve its position on spatial options around and beyond Harlow (subject to maintaining its objection to growth to the north of Harlow North).

The evidence base:

- The evidence base needs to be revised to assess the implications of growth levels other than those within the East of England Plan and the potential impact of the decision not to progress a second runway at Stansted.
- The extent to which substantial growth is required to secure the 'regeneration' of Harlow needs to be further clarified. Specifically, what are Harlow's regeneration issues and which of those issues require housing growth? To what extent would each of the options for major housing developments on the periphery and beyond the town complement/run contrary to regeneration aspirations/requirements?

- Considerably more evidence is required in terms of the existing and likely transportation and water/sewerage requirements of the town. Further work on infrastructure requirements, including identified funding sources – for different scales of growth and spatial distributions, within the context of a comprehensive Delivery Plan
- Evidence on what rates of housing and employment growth are genuinely likely to materialise at Harlow given the current state of the economy and the housing market (to inform target-setting).

North of Harlow:

- The County Council affirms its concerns about growth to the north of Harlow and considers that the Secretary of State's reasons for setting aside the East of England Plan's Panel's conclusions and recommendations was flawed.
- The County Council takes the view that unless there is substantive evidence to the contrary, the East of England Plan Panel's conclusion that the growth strategy for Harlow should be one based on development within the town and peripheral growth to the east, south and west should be progressed.
- The scale of growth [to the north] was not adequately justified, the case for the perceived causal links between housing growth and regeneration benefits not adequately made, large scale new settlement size development to the north of Harlow would not be linked adequately to the town and would operate as a satellite and competing settlement rather than contributing towards Harlow regeneration, the adverse impacts on land to the north of Harlow are unacceptable.

Developing a delivery strategy:

- A fundamental issue for the Core Strategy is the extent to which adjacent local authorities are willing to support the growth aspirations/infrastructure/other proposals of Harlow Council beyond its administrative boundaries.
- Further stages of Core Strategy preparation need to be informed by a comprehensive Delivery Plan with sign-up from relevant organisations. If this proves not to be possible there is every likelihood that the Core Strategy would not be found sound at Examination.

Sustainability Appraisal:

- The sustainability appraisal simply accepts the stance that the Core Strategy and Harlow Options Appraisal study take – the delivery of the East of England Plan growth target requirements. Therefore the sustainability appraisal also fails to identify, describe and evaluate reasonable alternative housing and employment growth levels and reasonable alternative spatial options beyond the Harlow town boundary. The approach to Sustainability Appraisal needs to be substantively revisited during subsequent Core Strategy stages.

Transportation:

- The County Council remains concerned about the impact of the proposed growth around the town on the transportation infrastructure within Hertfordshire - including the WAML, A414 and A1184.
- Planned and proposed increases in capacity to the road and rail network need to be fully assessed prior to the production of a preferred strategy.

- The County Council has yet to see any convincing case for a A414-M11 link road. The main case for the scheme seems simply to serve a northward expansion of Harlow.
- There is no clarification on what 'promoting the role of Harlow as a transport interchange along the M11' (Objective 24) actually means.
- In terms of sustainable transport issues the Core Strategy appears to be somewhat deficient. Little consideration seems to have been given to the strategic rail network.
- Possibility of increases to the capacity of the central line (resulting from cross rail) need to be included in the Core Strategy as this provides a valid alternative for commuting
- None of the options described in the Core Strategy appear to give sufficient consideration to transport infrastructure. The County Council welcomes the commitment to further explore transportation issues and, as an adjacent transportation authority, will expect to be fully involved in any ongoing and future technical work.

Historic environment:

- This area has an exceptionally rich and varied historic environment (including buried archaeological remains, buildings and settlements of historic importance, and historic landscapes). Development within it would therefore have substantial implications for the protection of the historic environment.
- The County Council suggest a number of changes to the Core Strategy with regard to the historic environment and highlight that the County Council is willing to provide information to Harlow Council.

Other:

- The County Council make some suggestions on how to incorporate minerals and waste considerations and environmental issues. Reference is made to the attached comments made by the Hertfordshire Biological and Records Centre.

10. Summary of representation received from Hertfordshire County Council (Property)

- Essential that Hertfordshire County Council is fully involved in the LDF process if development is envisaged to take place in East Hertfordshire District as any such development would have an effect on County Council service requirements.
- Re-submitted response made to the Harlow Infrastructure Study Stage 2 which relates to the future infrastructure requirements for adult social services, children's services, primary and secondary education, emergency services, libraries, youth services and solid waste management.
- In addition to the resubmitted response Hertfordshire County Council suggested changes to Para 2.5.2 to reflect the fact that delivering certain elements of the Core Strategy will require consultation, help and support from both Essex and Hertfordshire County Council.

11. Summary of representation received from Hertfordshire Biological Records Office

- This area of consideration is much more than ‘Green Wedges’ and ‘Green Spaces’. Emphasis must be placed on protecting and enhancing the natural environment; both habitats and species.
- Spatial Options A, D, E show negative effects on county Wildlife Sites and ancient woodlands to the north of Harlow.
- There is a substantial data gap that must be filled before development on these scales can proceed, including the impact of development on protected areas (county Wildlife Sites and ancient woodlands) amongst others.
- Biodiversity is a key test of sustainable development, in line with national Government policy, and an essential ingredient of quality of life by contributing positively to environmental objectives.
- Key wildlife habitats and species must be protected from harm and the potential impact of development and every opportunity should be taken to enhance existing habitats and species populations and to create new habitats in line with national and county Biodiversity Action Plan targets.
- Wildlife sites must be retained, protected and buffered from development and wildlife corridors (green spaces) should be created between sites to allow wildlife species to migrate between sites and out into the open countryside.
- Natural features and habitats, and the species they support, must be viewed as important. SSSIs are important because of their national statutory status; County Wildlife Sites are locally important because they represent what is considered to be important at a district level. All wildlife sites must be protected and connected together via a network of functional ecologically robust green corridors (networks); not isolated from each other and surrounded by housing.
- Sustainable Urban Drainage Systems (SUDS) should be included in the design of proposed development, to control and contain polluted surface water run-off.
- Open spaces within developed areas should consist of multifunctional green spaces that link together and form corridors through and between each neighbourhood and ultimately link those neighbourhoods with the surrounding countryside. Green corridors and green spaces should be used to form pedestrian walk ways and cycle routes, so that residents are able to walk/cycle to local shops, facilities and schools without using roads and cars.

12. Summary of representation received from The Highways Agency

- The Highways Agency can't be expected to cater for unconstrained traffic growth generated by new development.
- Highways Agency's role is to safeguard the core function of the strategic road network
- Policies and proposals should aim to reduce traffic generation at source.
- The Core Strategy should consider the provision of public transport to each broad development site and how services will connect with the existing urban area of Harlow, particularly town centre, railway stations, employment areas and neighbouring towns.
- Consideration needs to be given to the relationship between employment and residential development.
- Development options which maximise investment in and use of public transport, walking and cycling to local employment in preference to the car should be encouraged.

- Sustainability of all site options will be dependent on co-location of employment, public transport and access to services and facilities.
- Evidence supporting the Core Strategy should include traffic modelling - modelling commissioned through the Harlow Stansted Gateway Board will be very useful in this regard.
- Based on the level of detail provided in CSIO, it is too early to estimate precisely the traffic impact on the strategic trunk road and motorway network.
- There is a general presumption against new junctions on motorways (particularly where this does not provide strategic benefit or is provided purely to accommodate new development).
- Evidence in form of modelling will need to demonstrate the impact of a new junction on the M11.
- Business case for a new link road and junction will need to demonstrate that it is deliverable.
- Diversion of funding to new link road and new junction should not undermine any improved public transport services.
- Based on limited information available, development to the south of Harlow may be considered less sustainable because the site is located further away from railway stations and town centre and employment sites, compared to other spatial options.
- All spatial options may experience these disadvantages to some degree.
- Southern Site also next to Junction 7, potentially reducing the incentive to use sustainable transport methods, even if improved.

13. Summary of representation received from High Wych Parish Council

- The Core Strategy appears to lack clear focus.

Regeneration:

- The link between regeneration and growth is not made conclusively.
- The Core Strategy should focus on the existing housing and employment issues in Harlow.
- The aim should be to enhance Harlow as an attractive and sustainable place to live, whilst investing in skills and training.

Growth to the north of Harlow:

- It is incredible Harlow is seeking to preserve its own environment by degrading another District's.
- Spatial Options are based on flawed and withdrawn policy which should no longer be considered.
- The Council will need to take account of the Localism Bill and the pending abolition of the RSS.
- Key aspects of infrastructure are technically undeliverable and most other infrastructure has no prospect of being funded. The consultation should reflect these realities.
- Wildlife and habitat associated environmental impact of development to the north of Harlow makes it unacceptable.
- The development won't regenerate Harlow and will likely deplete the quality of life for many.

- The local communities proposal for Gilston Great Park should direct how land north of Harlow is used.
- The Stop Harlow North submission fully reflects the view of High Wych Parish Council.

Environmental Issues:

- The damaging impact on the environment and wildlife habitats does not appear to be given sufficient priority in the Core Strategy.

Skills & Training:

- The Council should focus on vocational training institutions rather than aspire to be a University Town, (i.e. meet needs of existing and future employers).
- More focus is needed on enhancing the town's facilities to make it attractive for new employers.
- There's an opportunity to provide regeneration and new infrastructure through low carbon and renewable power.
- Policies focused on attracting new employers to Harlow are weak.

Green Wedges:

- The Green Wedges should be reviewed to meet future development – as per quote from Gibberd about Harlow being an organism which changes as people's needs change.

Employment:

- There is a heavy bias towards retail in town centre. Maybe more could be done to encourage employment here?
- Given congestion problems, employment sites could be identified on the South side of the town near junction 7.
- Edinburgh Way contributes much traffic congestion. The Council should encourage shops in local neighbourhoods to reduce this.

14. Summary of representation received from Hunsdon Parish Council

- Disagrees with the assertion that Greenfield development should be located to the north of Harlow. This pre-empts the policy process. At the Issues and Options stage, all options should be on the table but no decisions made.
- 16,000 new homes far exceeds local needs and there is no proven link between town size and regeneration (reference made to Harlow Council's own evidence studies)
- Paragraph 3.4.3 is not supported and urgent attention is needed to deficiencies in Harlow Council's evidence base.
- Growth outside Harlow District is a matter for the respective authorities and not for Harlow to unilaterally to decide.
- Proposals are prepared in the era of regional planning and until a robust evidence base is established, there is no basis for growth outside Harlow District.

- Growth in sustainable locations is appropriate but current evidence base needs to be reviewed and gaps filled before 'sustainable locations' can be identified. Statements identifying Harlow north are therefore premature.
- No robust evidence has yet been produced that growth into neighbouring districts is required in order to enhance or reinforce Harlow's sub-regional role.
- Scott Wilson report suggests that there is a danger that large-scale development north of the Stort could drain investment away from the existing town.
- Development should be directed to areas that would maximise regeneration but only convincing evidence relates to sites within the existing town.
- Employment evidence concludes that with the 'land north of Nortel' Harlow District has enough employment land to meet future requirements for the base case and the growth scenarios in a gross sense. From the point of view of establishing future need, the argument is based on a circular logic resulting in a self-fulfilling prophecy, i.e. the need is the RSS policy requirement. In a post-RSS era such a definition of need cannot be left unchallenged.
- The growth options, but particularly option A and B, are based on the top-down options arising from the wording of Policy HA1. With the changes to the planning system since the study was published, there are no longer effective grounds for this option going forward. It is unclear why Harlow Council is consulting on Options A to E as the Scott Wilson report as the options were not developed as stand alone options for consultation.
- Option C is the most sustainable option based on the combined criteria from the assessment.
- Raise a number of concerns about the Options Appraisal Methodology.
- Question the relationship between housing to the north of Harlow and delivering the regeneration of Harlow (Option D, regeneration led).
- There is a striking omission in the evidence base regarding the delivery of regeneration. Such evidence would need to be the cornerstone of a clear strategy to directly address this issue, without which there is a danger that expansion could jeopardise the future of Harlow, as Scott Wilson consultants point out.
- Reference made to East Herts. Council's current analysis and suggest that only when the results of this analysis are known and other technical work has been undertaken will it be known whether north of Harlow is considered an appropriate location for development.
- The Scott Wilson Harlow Options Appraisal was prepared in accordance with HA1 of the East of England Plan. The Government has made clear its intention to abolish the Regional Strategies including the East of England Plan. The suggested approach should therefore be viewed in the context of the new government's approach to planning, as set out in the Localism Bill.
- Reference made to Question 43 of East Herts. Core Strategy consultation (Growth to the north of Harlow). If East Herts. Council's emerging Preferred Option does not suggest that development north of Harlow should form part of a development strategy for East Herts. district, then Harlow Council should reflect this in its Core Strategy Preferred Options. Harlow Council should not attempt to pre-empt East Herts. Council's policy process and should not proceed unilaterally with a Preferred Options based on growth to the north.
- Highlight a number of concerns about the cost of infrastructure. Harlow Council will need to demonstrate satisfactorily how this infrastructure will be funded, given that the funding situation has changed dramatically since HIS was published in March 2010 (and the bulk of the study work was carried out during 2008).

- The Rye Meads Water Cycle Strategy was not a ‘detailed’ strategy in that, whilst it provided some suggestions, there were several major areas of concern remaining to be resolved if any development at Harlow is to be served by Rye Meads Sewage Treatment Works.
- As work on its Core Strategy progresses, it would be sensible for Harlow Council to pay heed to the changing policy context at national, regional, and local levels. Harlow Council will be unlikely to adopt a Core Strategy whilst the East of England Plan still forms part of the Development Plan. Under proposed new legislation it appears likely that any expansion of Harlow could only be achieved with the agreement of the neighbouring local planning authorities and communities. Given this changing policy context, the evidence from the Harlow Options Appraisal by Scott Wilson consultants suggests that the situation on the ground would indicate that Option C should be the preferred option. Such an option does not include development to the north of Harlow.

15. Summary of representation received from Little Hadham Parish Council

- The Parish Council supports the Stop Harlow North Campaign and objects to any further development to the areas north of Harlow
- Any further development to the north of Harlow will cause increased congestion and pollution in Little Hadham and the surrounding villages
- Any further development to the north of Harlow will spoil the rural ambiance of Little Hadham and the surrounding area.

16. Summary of representation received from Much Hadham Parish Council

- Totally opposed to the development of Harlow North proposed in the East of England Plan
- Endorses the objections made by Stop Harlow North to any development north of Harlow
- The East of England Plan’s housing requirement for Harlow was based purely on political considerations and the Government paid little or no attention to planning considerations
- Unclear why Harlow Council has consulted on the potential for development north of Harlow when all the land for this lies within East Hertfordshire and East Herts. Council remains opposed to any development north of Harlow
- Unclear how the necessary infrastructure for Harlow North would be financed given the current constraints on public spending
- If Harlow North went ahead some of the residents would work to the north of Harlow putting more pressure on transport infrastructure to the north especially the B180 and B1004. Furthermore, increased traffic running through Much Hadham would cause more emissions, more damage to the historic buildings fronting on to the High Street and more accidents
- Harlow North Joint Venture’s (HNJV) main objective is not to regenerate Harlow but to make money by creating a development which is separate from Harlow in location and atmosphere. This was demonstrated when HNJV sent a flyer to local residents which claimed that Harlow North would deliver all the new housing that East Herts. Council needs to build to meet the East of England Plan’s housing target for East Herts. by 2031
- Consultants have suggested growth to the north could undermine the regeneration of Harlow and “work” would be needed to avoid this. Unclear how this could be achieved

- Consultants made it clear without the constraints of the East of England Plan their preferred option would have been (Option C) which would not involve building to the north of Harlow
- The immediate priority should be the redevelopment of Harlow itself, especially more affordable housing, rather than on a new development to the north where the necessary infrastructure does not exist
- The benefits of the Council Tax paid by residents in Harlow North would accrue to East Herts. Council not to Harlow Council. There is no suggestion the Essex/East Herts. boundary should change
- The overwhelming majority of residents in Much Hadham, Widford, Hunsdon, Eastwick and Gilston oppose Harlow North

17. Summary of representation received from Natural England

Infrastructure:

- All relevant issues have not been addressed.
- All the elements of infrastructure have not been identified. The section only refers to grey infrastructure, and predominantly transport.
- Green Infrastructure has vital role to play in the development of the district so has to be considered alongside other infrastructure types.

Climate Change:

- Climate change has not been identified as a key issue. The need to mitigate and adapt to climate change should be a pivotal issue in the Core Strategy.

Green Wedges / Green Infrastructure:

- It's important to retain and enhance existing green spaces in Harlow.
- The Green Wedges are important aspects to Harlow's development – allowing for biodiversity, recreation, alongside relatively high densities.
- NE supports the strengthening of Green Wedges and we expect to see these spaces preserved into the future.
- Green Wedges and Green Belt should be lowest priority for new development.
- The Council should *not* consider underused open spaces for development before releasing land in the Green Belt.
- Most important priorities directing new development are: Protecting green wedges (1), areas with good access to public transport and other services and facilities (2), protecting important landscapes (3) and protecting the Green Belt (4).
- Policies should establish a network of multi-functional green infrastructure and afford stringent protection to the existing designated sites.
- NE strongly supports the recognition of the importance of the natural environment and biodiversity as a theme in its own right in the 'Placeshaping' section and in 'Lifestyles'.
- The Appendix should list the 2010 Green Infrastructure Report & Delivery Plan.

18. Summary of representation received from NHS West Essex (Estates)

- The Council has not identified all the relevant issues.
- The Core Strategy should seek to align its policies and objectives with those of key infrastructure providers such as West Essex PCT.
- The objectives and priorities set out in the Joint Strategic Needs Assessment should inform the Core Strategy.
- The impact of additional housing on health care provision and funding needs to be recognised.
- The cumulative impact of growth proposed in East Hertfordshire and Epping Forest on healthcare services, facilities and funding needs to be considered.
- The need to support funding for health facilities should be recognised within the Core Strategy.
- An increase in the population of 1,800 people generates the need for an additional general practitioner (GP) and associated services.
- Therefore, the population growth associated with the provision of 16,000 new homes is likely to generate a requirement for approximately 8 GPs (based on Harlow's average household size of 2.3 people and taking into account existing operational capacity).
- These additional GPs will need to be accommodated through enhanced or additional health care provision over the plan period.
- WEPCT supports delivering growth "in a phased and co-ordinated way to ensure appropriate and timely delivery of a range of infrastructure necessary to support growth"
- Extra care housing is required.
- Objective 7 - Provision for elderly and disabled people and other special needs housing, taking account of the additional social infrastructure requirements generated by such development.
- Objective 23 – Developer contributions should be sought for new facilities and ongoing revenue funding. This amendment would allow for flexibility where the provision of new or enhanced healthcare facilities may not be in line with WEPCT's programmes.
- Objective 23 - This policy area should not impinge on WEPCT's statutory duty to commission all health care and provide primary health care facilities within Harlow.
- Objective 23 should support expansion of existing health centres, in accordance with the health authority's plans and programmes.
- But this policy should not prejudice the relocation of existing facilities, where this is a more appropriate option.
- Objective 25 should aim to align policies with those of key infrastructure providers.
- Open spaces and green wedges should be retained where possible.
- Public health benefits arising from access to and use of open space should inform the decision to redevelop underused open spaces and green wedges.
- Opportunities to regenerate underused open spaces should be considered before redeveloping them for other purposes.
- The amount of open space available within Harlow should be assessed against national standards.

19. Summary of representation received from NHS West Essex (Public Health and Property)

Withdrawal of the Regional Strategy & Harlow's Aspirations:

- Withdrawal of the regional strategy gives Harlow a greater degree of choice about development.
- Development should be based on the needs and aspirations of local people.
- Methodology to identify what those needs and aspirations are should be robust and could usefully include commissioned social marketing work.
- Whilst the theme of raising aspirations is often quoted, more work is needed to understand what this means to people who live and work in Harlow.
- Doing this properly will require an investment of time and effort, and possible external resources.

Regeneration Ambitions of Harlow:

- The criteria by which development will “maximise regeneration” is not defined.
- Harlow stakeholders would benefit from a shared vision about what regeneration means.
- Specific regeneration outcomes need to be identified.
- Areas of deprivation in SW Harlow are well known - plans should ensure prosperity and health gap between the best and worst off in the town does not widen.

An Outcome Framework:

- Generally, there should be more emphasis on defining and measuring outcomes, with reference to a specific outcomes framework.
- The vision and strategic objectives need a clear outcomes framework.
- Partnership work could then be based on agreed priorities.

Alignment with the Community Strategy:

- Greater linkages are required between the health and well being section of the community strategy and the emerging Core Strategy themes.

Themes:

- We will need to be wary of silo thematic approaches and instead look at spatial/geographical approaches.
- It is not just housing and lifestyles which impact upon health and well being but also infrastructure and prosperity.

Evidence Base - Integrating the Core Strategy with Health Plans:

- Planning and Health plans and strategies need to be aligned.
- The Joint Strategic Needs Assessment provides forecasts and advance warning of likely population need and how circumstances can be mitigated.
- Harlow Health Profile 2010 is a key document.
- PCT Strategic Plan 2009-14.

- The evidence base on effective interventions to achieve *behaviour change*, reviewed and published by the National Institute for Clinical Excellence, should be given due consideration.

Health Services:

- Growth in population *may* require growth in health services, but it is not a linear correlation.
- Planning for population growth needs to be considered in the context of health service and facility redesign, such as care closer to home and the drive towards home or community based care rather than hospital based care.
- The increased demands of an ageing population will also require planning and provision.
- The likely impact of Harlow growth on health need will require detailed consideration and close liaison between planners and PCT staff to ensure health workforce and facility plans are fit for purpose.

Health Impact Assessments:

- Health Impact Assessment should be used to review infrastructure plans and the Council's Core Strategy.

Level of Growth:

- No strong disagreement with the level of growth provided those homes are serviced by the necessary transport and social infrastructure.

Green Wedges / Green Spaces:

- All efforts should be made to protect Harlow's green spaces.
- Development should focus on underused brown field sites.
- Natural environment for outdoor recreation and biodiversity is important and should be protected
 - There is good evidence that exposure to nature and a natural environment promotes positive mental health.
 - There is also some evidence that living in an environment with close proximity to green spaces reduces crime and domestic violence.

Cycling and Walking:

- Improving and extending the cycle network is welcomed.
- But this in itself will not automatically increase cycling and physical activity.
- There's a need to address both behavioural and environmental factors.
- A targeted and geographic approach is likely to be more effective than silo approach.
- Personal Travel Planning is important.
- Secure cycle parking should be made if this is found to be a barrier to cycle usage.

Traffic Congestion:

- Increased traffic congestion in Harlow is avoidable by encouraging a shift to healthier forms of transport for the majority of people who live and work in the town.
- Health impacts of pollution should provide an added incentive to reducing congestion, as well as the cost of lost productivity to Harlow businesses.

Where should higher densities go?

1. Around public transport hubs
 2. At appropriate locations within neighbourhood areas
 3. Hatches
 4. Neighbourhood Centres
 5. Within the Town Centre
- Given the potential negative effects of high population density on mental health, development should take account of existing densities and minimise the increase in density in areas where it is already relatively high.
 - However, this has to be balanced against protection of green wedges.

Flooding:

- There is potentially a serious public health impact of flooding to be considered if building development on floodplains occurs.

Directing new development in Harlow:

1. Meeting regeneration goals
2. Protecting Green Wedges
3. Maximising the use of previously developed land
4. Protecting the Green Belt
5. Where there is existing infrastructure capacity
6. Developing underused green spaces
7. Protecting important landscapes

Existing Employment Areas:

- Employment areas serving deprived areas to the SW are important since employment is a key determinant of good health.
- We need to monitor effect of job creation schemes on the worst off people living in South West Harlow.
- Such schemes should be subject to an equality impact assessment to ensure that the prosperity and health gap between the best and worst off in the town does not widen.

Shopping:

Development should maximise the public health impact by ensuring:

- A range of shops should be high quality, diverse and affordable.
- A focus on local grocery and butcher stores who source fresh local produce and fruit and vegetables

- Reduction in the number of fast food/high fat food outlets to help counter Harlow's high prevalence of obesity.

Spatial Options:

Option A

- This is obviously a good location if plans to create a new junction from the A414 to the M11 come to fruition.
- The obvious need for primary care facilities to service 10,000 new homes north of Harlow.
- In the design of new areas it is important to address wider determinants of health.
- Harlow was designed to maximise the positive public health impact and new development should take the same approach.
- Public health impact can be improved by providing:
 - strong social networks
 - Opportunities for outdoor recreation and exposure to nature in close proximity to the houses, e.g. through the use of "pocket parks".
- We would recommend that a health impact assessment be considered for the Harlow North development option.

Option B

- We agree with the consultant's concerns about the lack of transport infrastructure to the south of the town and that housing here would encourage private car usage and increase traffic congestion.

Option C

- We agree

Option D

- We agree

Option E

- We strongly support this option because of its positive public health impact in promoting sustainable transport.

Consultant's suggested approach to accommodating growth

- We agree

20. Summary of representation received from Roydon Parish Council

Additional issues:

- The setting of the town in relation to surrounding villages; The role of the Metropolitan Green Belt; Joined up thinking with neighbouring authorities.
- The Core Strategy should consider its affects on neighbouring authorities/areas
- Green Wedges should be reviewed.
- Any extensions to the Pinnacles area could have an adverse effect on Roydon village in EFDC district.

Consultants Option A:

- This is the best of the proposed options. There will be minimal intrusion into the Green Belt and the integrity of Roydon village would be preserved.

Consultants Option B:

- Roydon village could be very adversely affected by this option and could in fact be absorbed into Harlow.

Consultants Option E:

- This option would see Roydon become part of Harlow

Consultants Suggested Approach:

- The southern and western extensions would have little relevance with the town centre and are not near to the main transport links.
- Transport links need to be improved (even allowing for the work that will shortly finish on the A414) - roads in and around Harlow are often gridlocked
- Transport infrastructure needs to be improved. Some areas where additional housing is proposed are already heavily congested.

21. Summary of representation received from Sawbridgeworth Town Council

- Disagrees with the assertion that Greenfield development should be located to the north of Harlow. This pre-empted the policy process. At the Issues and Options stage, all options should be on the table but no decisions made.
- 16,000 new homes far exceeds local needs and there is no proven link between town size and regeneration (reference made to Harlow Council's own evidence studies).
- Paragraph 3.4.3 is not supported and urgent attention is needed to deficiencies in Harlow Council's evidence base.
- Growth outside Harlow District is a matter for the respective authorities and not for Harlow to unilaterally decide.
- Proposals are prepared in the era of regional planning and until a robust evidence base is established, there is no basis for growth outside Harlow District.
- Growth in sustainable locations is appropriate but current evidence base needs to be reviewed and gaps filled before 'sustainable locations' can be identified. Statements identifying Harlow north are therefore premature.
- No robust evidence has yet been produced that growth into neighbouring districts is required in order to enhance or reinforce Harlow's sub-regional role.
- Scott Wilson report suggest that there is a danger that large-scale development north of the Stort could drain investment away from the existing town.
- Development should be directed to areas that would maximise regeneration but only convincing evidence relates to sites within the existing town.
- Employment evidence concludes that with the 'land north of Nortel' Harlow District has enough employment land to meet future requirements for the base case and the growth scenarios in a gross sense. From the point of view of establishing future need, the argument is based on a circular logic resulting in a self-fulfilling prophecy, i.e. the need is the RSS policy requirement. In a post-RSS era such a definition of need cannot be left unchallenged.
- The growth options, but particularly option A and B, are based on the top-down options arising from the wording of Policy HA1. With the changes to the planning system since the study was published, there are no longer effective grounds for this option going forward. It is unclear why Harlow Council is consulting on Options A to

E as the Scott Wilson report as the options were not developed as stand alone options for consultation.

- Option C is the most sustainable option based on the combined criteria from the assessment.
- Raise a number of concerns about the Options Appraisal Methodology.
- Question the relationship between housing to the north of Harlow and delivering the regeneration of Harlow (Option D, regeneration led).
- There is a striking omission in the evidence base regarding the delivery of regeneration. Such evidence would need to be the cornerstone of a clear strategy to directly address this issue, without which there is a danger that expansion could jeopardise the future of Harlow, as Scott Wilson consultants point out.
- Reference made to East Herts. Council's current analysis and suggest that only when the results of this analysis are known and other technical work has been undertaken will it be known whether north of Harlow is considered an appropriate location for development.
- The Scott Wilson Harlow Options Appraisal was prepared in accordance with HA1 of the East of England Plan. The Government has made clear its intention to abolish the Regional Strategies including the East of England Plan. The suggested approach should therefore be viewed in the context of the new government's approach to planning, as set out in the Localism Bill.
- Reference made to Question 43 of East Herts. Core Strategy consultation (Growth to the north of Harlow). If East Herts. Council's emerging Preferred Option does not suggest that development north of Harlow should form part of a development strategy for East Herts. district, then Harlow Council should reflect this in its Core Strategy Preferred Options. Harlow Council should not attempt to pre-empt East Herts. Council's policy process and should not proceed unilaterally with a Preferred Options based on growth to the north.
- Highlight a number of concerns about the cost of infrastructure. Harlow Council will need to demonstrate satisfactorily how this infrastructure will be funded, given that the funding situation has changed dramatically since HIS was published in March 2010 (and the bulk of the study work was carried out during 2008).
- The Rye Meads Water Cycle Strategy was not a 'detailed' strategy in that, whilst it provided some suggestions, there were several major areas of concern remaining to be resolved if any development at Harlow is to be served by Rye Meads Sewage Treatment Works.
- As work on its Core Strategy progresses, it would be sensible for Harlow Council to pay heed to the changing policy context at national, regional, and local levels. Harlow Council will be unlikely to adopt a Core Strategy whilst the East of England Plan still forms part of the Development Plan. Under proposed new legislation it appears likely that any expansion of Harlow could only be achieved with the agreement of the neighbouring local planning authorities and communities. Given this changing policy context, the evidence from the Harlow Options Appraisal by Scott Wilson consultants suggests that the situation on the ground would indicate that Option C should be the preferred option. Such an option does not include development to the north of Harlow.

22. Summary of representation received from Thames Water Property Services

- It is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding, pollution and water shortages.
- The section on infrastructure needs to refer to wastewater infrastructure.

- Strategic Objective 25 should be amended to read “Work with key providers to ensure that the infrastructure requirements to serve development can be met ahead of occupation”.
- It would be easier to provide the wastewater infrastructure upgrades required for large scale developments than for more spread out options.
- The preferred approach from a wastewater infrastructure point of view would be for development to be located in sites to the east and north of Harlow.
- It would be more difficult to provide the required wastewater infrastructure for the development sites shown within Epping Forest to the south and west of Harlow.
- But it would be possible to provide infrastructure for small scale developments of less than 500 dwellings.
- All the sites proposed in Harlow will require sewer upgrades.
- Development should be phased over a 20 year period so that infrastructure can be identified, funded and delivered.
- Water and sewerage undertakers also have limited powers to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.
- There should be a Core Strategy policy on water and sewerage infrastructure capacity. This should state that planning permission will only be granted for development where sufficient capacity exists or where extra capacity can be provided in time to serve the development.
- There should also be a Core Strategy policy on Water and Sewerage Infrastructure Development. This should support the development or expansion of water supply or waste water facilities, provided that the need for such facilities outweighs any adverse impact or that any such adverse impact is minimised.
- The wastewater infrastructure capacity for Harlow (sewerage and treatment) is considered in the Rye Meads Water Cycle Study which forms part of the evidence base for the Core Strategy.

22. Summary of representation received from Widford Parish Council

- Fully supports the submission that was made to the Issues and Options consultation by Stop Harlow North
- Objects to any development on Green Belt land north of the River Stort in East Hertfordshire which is unnecessary, unsustainable and undemocratic

Appendix 3 – Summary of Responses to the Sustainability Appraisal

Appendix 3.0 Sustainability Appraisal (incorporating SEA) and Habitats Regulations Assessment

Six groups and organisations commented on the Sustainability Appraisal (SA). Set out below is a summary of the key issues raised in relation to the SA:

- The SA needs to assess more fully the impact of Climate Change and put forward mitigation/adaptation measures for inclusion in the Core Strategy.
- The SA needs to be substantively revised during subsequent Core Strategy stages to reflect changes resulting from the revocation of the East of England Plan. Currently the SA simply accepts the stance that the Core Strategy should deliver the East of England Plan growth target requirements. When the East of England Plan is revoked the SA will need to identify, describe and evaluate reasonable alternative housing and employment growth levels and reasonable alternative spatial options beyond the Harlow district boundary.
- The options tested in the SA only related to those suggested in the Spatial Options Report. This appears to have prejudged the Issues and Options stage as the only options tested are those put forward in an evidence base document undertaken to inform the Core Strategy rather than to establish the strategy. The SA must be redone once appropriate Spatial Strategy Options have been set out by the Council.
- The SA fails to fully consider the dynamics of the housing market and the implications of locating development within an area accessible to London.
- The SA provides no commentary on the potential environmental, social and economic problems that would result if housing shortage is not eased.
- There is a lack of understanding about other sub-regional economic issues impacting on the Core Strategy.
- The SA does not give enough weight to the significant positive sustainability impacts in terms of economic and social regeneration of Harlow.
- There is a lack of evidence to support statements made about the impact of development on the southern ridgeline. Further investigation is required to ascertain the impact of development (and what scale) in the south on the ridgeline. Furthermore, the appraisal over emphasises the significance of the ridgeline as a constraint, given the statutory designations within the vicinity of other spatial options. The SA needs to consider further measures, including view management frameworks, that could be included to mitigate the impact of development in the south on the ridgeline.
- It is unclear why the “eastern growth area” has been identified as one of the spatial area criteria, given that its planning status is the same as the other growth locations (i.e. north, south and west) under consideration.
- The report alludes to drainage infrastructure limitations which do not exist.
- The SA does not sufficiently identify and balance environmental concerns with social and economic impacts.
- Whilst the Issues and Options Consultation Document did not test alternative housing requirements, the housing requirement identified in the document was tested during the formation of the East of England Plan and found to be appropriate.
- Greater emphasis appears to be given to environmental constraints, not all of which are necessarily significant. The SA should give greater emphasis to the significant positive sustainability impacts in terms of economic and social regeneration of Harlow, and proximity to public transport. The SA also fails to recognise that the approach to delivering growth at Harlow is about the wider housing needs of Hertfordshire, Essex and London.

Appendix 4 - List of Respondents

Appendix 4.0 List of Respondents

FIRST NAME	MIDDLE NAME	SURNAME	COMPANY/ORGANISATION	PERSON ID
Ernesto		Abad		[6282]
Sarah		Abbott		[6510]
Terry		Abel		[6159]
Ben		Acheson		[6908]
Tim		Acheson		[6523]
Mark		Adams		[6839]
Beyrl		Adams		[6639]
J		Agate		[6579]
William		Aitken		[6441]
Jeremy		Aknai		[6105]
Peter		Aknai		[5987]
Sally		Aknai		[6414]
Richard		Allanach		[5791]
David		Allard		[6592]
Elaine		Allen		[6031]
Michael		Allen		[6172]
Stan		Allen		[5775]
Dominic		Allington-Smith		[7140]
Dean		Amor		[6375]
Bobby		Anderson		[7287]
Gary		Anderson		[7414]
John		Anderson		[7509]
Daniel		Andrews		[7073]
Maureen		Annetts		[6828]
Edward		Anthony		[6074]
Tina		Arden		[6973]
Warren		Arden		[6971]
Jame		Argent		[7492]
John		Argent		[6116]
Carol		Arnesen		[5915]
Vince		Arrowsmith		[6489]
Sue		Ash		[6953]
Lorraine		Ashall		[7356]
Rod		Ashall		[7352]
Sheila		Ashall		[7353]
Brenda		Ashley		[7482]
John		Ashley		[7480]
Roy		Atkins		[7379]
Suzanne		Atkins		[7416]
Liz		Atkinson		[7580]
Irene		Auerbach		[6897]
Gary		Austin		[7203]
P	N	Austin		[6188]
Steve		Avis		[7339]
Anna		Avis		[5956]
Karen		Backshall		[7503]
Paul		Backshall		[7508]
Mrs		Bacon		[6472]
Jane		Badrock		[6992]
Sarah		Bagnall		[7079]
Alyson		Bailey		[6909]
Bob		Bailey		[6581]
Eliot		Bailey		[6481]
T		Bailey		[6552]
Helen		Bailey		[6873]
Willow		Bailey		[6480]

Glen	Baker		[6921]
Mark	Baker		[7053]
Lucy	Baker		[7592]
Sarahjayne	Baker		[6970]
Colette	Balch		[6260]
Trevor	Bale		[7456]
Janet	Ballard	Roydon Parish Council	[5434]
Derek	Bandy		[6673]
Irene	Bannister		[6708]
Steven	Barker	H C Leach	[7665]
Ellen	Barker		[7341]
S	Barker		[7263]
Robert	Barker		[6979]
Tim	Barnard		[6810]
Teresa	Barnard		[6216]
Les	Barnes		[6879]
Rod	Barnes		[6719]
M	Barnes		[6717]
Melanie	Barnes		[6351]
Veronica	Barnes		[6878]
John &	Barnes		[5828]
Jane	Barnett	Briggens Estate	[7651]
David	Barnett		[6377]
Laurie	Barnett		[6386]
Paul	Barnett		[5993]
Ronald	Barnett		[7065]
Victoria	Barnett		[6535]
Irene	Barrall		[6152]
Roger	Barratt		[7074]
Andrew	Barrett		[6539]
Jane	Barrett		[6538]
Mag	Barrett		[5857]
Joanna	Barter		[5701]
Nicholas	Barter		[6408]
Gillian	Bassett		[5921]
John	Bassett		[5920]
Gillian	Baxter		[7078]
Darren	Beardon		[6910]
Catherine	Beaujeux		[5976]
Peter	Beaumont		[7286]
A	Bebee		[6624]
Michael	Beckman		[6488]
Claire	Beckmann		[7080]
Ed	Beckmann		[6738]
Ray	Beddoes		[5970]
Roger	Beeching		[7398]
L	Bell		[7018]
Anthony	Bellotti		[7048]
Sandra	Bellotti		[7047]
E	Belsey		[6780]
Mark	Bennet	St James Church	[470]
Jenny	Bennett		[6204]
Maureen	Bennett		[7166]
M	Bennett		[6975]
Tony	Bennett		[6675]
Michael	Bentley		[6707]
R	Best		[7237]
T	Best		[7240]
B	Beverley		[6039]
B	Beverley		[6038]

Tina		Bewley		[6376]
Robyn		Bewsey-Holden		[7150]
Peter		Bickley		[6194]
Evan		Bickmore		[7345]
Grace		Bickmore		[7064]
Lucy		Bickmore		[7554]
David		Bindefeld		[7530]
P		Bindefeld		[6611]
William		Bird		[5083]
C		Black		[5995]
Jennifer		Black		[6114]
Jayne		Black		[6856]
Andrew		Blackwell	Barratt Strategic	[7662]
David		Blake		[7606]
Max		Blakeman		[6620]
Hilary		Blease		[6803]
Trevor		Blease		[7322]
Mark		Bloss		[7085]
Claire		Bloss		[6395]
M		Blundell		[7419]
Catherine		Boaden		[6235]
A		Bond		[6280]
J		Bond		[6281]
Barbara		Borowski		[7524]
John		Borowski		[7523]
Lino		Bottalico		[6871]
Eve		Bottalico		[6258]
Oonagh		Bottalico		[6259]
Tracy		Bottalico		[6872]
Frances		Boul		[7264]
Francine		Bourgeois		[7027]
Steve		Bourne		[7481]
Vanessa		Bowerman		[6294]
Linda		Bowes		[5881]
Peter		Bowes		[6167]
Stuart		Bowman		[7169]
Richard		Bowran	Sawbridgeworth Town Council	[4945]
Veronica		Boxford-		
G		Brookes		[7215]
Frederick	David	Brace		[6341]
Robert		Bracey		[5882]
Andrew		Bramich		[6181]
D		Bramidge	Harlow Renaissance	[259]
C		Brand		[6344]
Giles		Brentnall		[6563]
Ian		Brentnall		[6268]
Virginia		Brett		[7490]
Leslie		Brett		[7489]
Pauline		Brewster		[6299]
Jean		Brewster		[6298]
Stephen		Brian		[6838]
Susan		Brickwood		[7569]
Richard		Brickwood		[7586]
Moira		Brickwood		[7458]
Colin		Bridge		[6400]
Gina		Bridgeman		[6572]
Chris		Bridgman		[7271]
Geoff		Bridle		[7305]
Jeff		Bridle		[7302]
		Bridle		[7304]

Paul	Bridle	[7309]
Zoe	Bridle	[7303]
Neil	Bridle	[6584]
Sue	Bridle	[6548]
Linda	Brierly	[7030]
Bob	Bright	[6516]
Ian	Brinham	[6347]
Lilian	Brinham	[6278]
G	Brinkley	[6804]
B	Brinkley	[7447]
V	Brinkley	[7448]
Brenda	Brinn	[7351]
Tomy	Brinn	[7393]
A	Brix	[6781]
Nicola	Brockington	[7052]
Michael	Brookes	[6596]
Ann	Brookfield	[6556]
Canan	Brown	[7025]
Douglas	Brown	[5052]
Joyce	Brown	[6930]
Michael	Brown	[5764]
Terence	Brown	[6297]
Val	Brown	[5961]
N	Brown	[6807]
Nicola	Brown	[6271]
Paul	Brown	[6269]
S	Brown	[7504]
Terry	Brown	[6739]
Anita	Brummit	[6063]
Gerald	Brummitt	[6066]
Frankie	Brunker	[7099]
Mark	Brunker	[7100]
Chris	Brunton	[6497]
Liam	Bryant	[6071]
Sharon	Bryant	[6623]
Janine	Bryant	[6070]
Lucy	Buckland	[7453]
Josh	Buckland	[7452]
K	Buckland	[7451]
Andrew	Buckle	[6364]
Ann	Buckle	[5964]
Eric	Buckmaster	[6373]
Francesca	Buckmaster	[6379]
Louisa	Buckmaster	[6374]
Ruth	Buckmaster	[6378]
Helen	Buckworth	[6590]
Nick	Buckworth	[6263]
Teresa	Bulloch	[7042]
Barbara	Burge	[5093]
Alan	Burgess	[26]
Anthony	Burgess	[7312]
Mark	Burgess	[6869]
Clare	Burkett	[6469]
Wayne	Burlingham	[7578]
Mr	Burnay	[7210]
Ria	Burns	[6212]
Andrew	Burtenshaw	[6368]
Gerald	Burtenshaw	[6072]
Dawn	Burtenshaw	[6068]
Keely	Burtenshaw	[7609]

Protection of Roydon Area PORA

Keith		Busby		[6240]
Thomas		Busby		[6844]
Marion		Busby		[6848]
D	C	Butler		[7574]
Emily		Butler		[7438]
Jack		Butler		[7437]
Paul		Butler		[5951]
Deanna		Butler		[6799]
Phil		Butler		[6507]
Steven		Butler		[5053]
Kevin		Butters		[6894]
Carol		Butters		[6887]
Henrietta		Buxton		[7167]
David		Buxton		[6380]
Nicholas		Buxton		[7555]
Fiona		Byatt		[6898]
Michael		Byatt		[6254]
Pat		Byatt		[6937]
Tony		Byatt		[7526]
Ed		Byrch		[6536]
Adam		Byrne		[6821]
Paul		Caddick		[6462]
Amanda		Cadisch		[6820]
Michael		Cairns		[6938]
Colin		Campbell	C. J. Pryor (Plant) Ltd	[7645]
Anthony		Camplin		[6648]
Sarah		Camplin		[7347]
Isabelle		Carr		[7326]
Catherine		Carrdus		[6628]
Jane		Carrington		[6011]
Sheila		Carroll		[5765]
Christian		Carruth		[6949]
Helen		Carruth		[6968]
Alyson		Carter		[7529]
David		Carter		[7229]
Janet		Carter		[7230]
Ben		Carter		[6099]
Lilli-May		Carter		[6044]
Sarah		Carter		[6499]
B		Carthy		[7086]
Chris		Carthy		[6059]
Rob		Carthy		[6054]
Tim		Carthy		[6055]
Jackie		Carthy		[6049]
Matthew		Cartmell		[6530]
Alexis		Casey		[6812]
James		Casey		[7151]
K		Casey		[7241]
C		Casey		[7187]
I		Casey		[7186]
Mr		Cash		[6079]
Mrs		Cash		[6080]
Thomas	& Audrey	Castle		[6191]
Hugh		Cater		[6425]
M		Cavalier	Cavalier Land Co	[5717]
P		Chad		[7116]
Peggy		Chad		[6762]
David		Chalk		[5889]
Margaret		Chalk		[7666]
Mike		Chapman		[6852]

The		Chapman's	[5824]
Brian		Chappell	[6994]
Chris		Chappell	[6954]
Chris		Chappell	[6995]
Jack		Chappell	[6996]
Tina		Chappell	[6075]
Michael		Charles	[5929]
Janet		Cheek	[7525]
Ray		Cherry	[6962]
Karen		Cherry	[6960]
Martin		Chown	[5853]
N		Chrimes	[6433]
Brenda		Church	[6346]
David		Clapham	[6834]
Nigel		Clark	[25]
Amy		Clark	[7207]
Derek		Clark	[5065]
Michael		Clark	[7540]
Eileen		Clark	[6950]
Kate		Clark	[7545]
Michael		Clark	[6663]
Peter		Clark	[6613]
Brian	& Barbara	Clark	[5820]
Andrew		Clark	[6487]
Phil		Clark	[6436]
T		Clark	[7289]
Judith		Clark	[7397]
M		Clark	[7288]
Karen		Clark	[6435]
Paul		Clark	[6922]
Rachel		Clark	[6512]
Sam		Clark	[5722]
Matt		Clarke	[7653]
David		Clarke	[6522]
John		Clarke	[6694]
Kim		Clarke	[6028]
Les		Clarke	[6388]
Ena		Clarke	[6389]
Lara		Clarke	[6223]
Sue		Clarke	[6746]
Cynthia		Clarkson	[6102]
Vanessa		Clay	[5969]
David		Clee	[7270]
Marianne		Clee	[5983]
Christopher		Clemmett	[5721]
Janet		Clemmett	[5874]
Michael		Clemmett	[6022]
Dean		Clemmett	[6027]
Brian		Clenshaw	[6458]
Philip		Clewes-Garner	[7020]
George		Clifton	[7015]
James		Clifton	[7556]
Revd		Clive	[7577]
J		Cobby	[6861]
Charles		Cochrane	[5891]
Paul		Cochrane	[6355]
Adrian		Coggins	[5845]
Dave		Coghill	[7246]
Debbie		Cole	[6196]
Ann		Coliings	[6653]

RGW Cherry & Associates

Stop Harlow North

Barrat Strategic Persimmon & Taylor Wimpey

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NHS West Essex

Andrew	Colley	[6942]
John	Collier	[6457]
Joyce	Collins	[6127]
Inga	Collins	[6125]
Jean	Collins	[6005]
John	Collins	[6006]
Ken	Collins	[6126]
Lisa	Collins	[5836]
Mary	Collins	[5925]
J	Collins	[7357]
Nicola	Collinson	[6057]
Rod	Colwell	[7493]
Kim	Compton	[7127]
A	Connolly	[5907]
Barry	Cook	[7242]
Steve	Cook	[6252]
Sophie	Cooke	[6085]
Michael	Cooksey	[6983]
Charmaine	Cooper	[7220]
Colin	Cooper	[7219]
David	Cooper	[6607]
Derek	Cooper	[6969]
Giles	Cooper	[7218]
Ian	Cooper	[7158]
Louise	Cooper	[5759]
Kristiina	Cooper	[5960]
Nicholas	Cooper	[7221]
D	Coote	[7307]
Ryan	Copping	[6303]
E	Copping	[6300]
Judy	Corkill	[7000]
Jean	Corlett	[5866]
Peter	Corlett	[5756]
Jan	Cornelius	[6729]
Andrew	Cornthwaite	[6428]
Jim	Cosgrove	[6835]
Suzanne	Costello	[7067]
Ronald	Coultrup	[6440]
Claire	Coupe	[6987]
M	Cox	[7455]
Trevor	Cox	[6249]
Sophie	Cox	[6855]
Taylor	Coxall	[7223]
Carole	Crabb	[7028]
Carol	Creswell	[6200]
Kevin	Creswell	[6199]
Neal	Creswell	[6201]
Bramwell	Cripps	[7060]
Kim	Cripps	[7061]
Sarah	Cripps	[7214]
Peter	Crool	[5999]
David	Cross	[6306]
Philip	Crowe	[6078]
Anne	Crowther	[7035]
Tim	Crowther	[6509]
David	Cullingford	[5225]
David	Cullingford	[6470]
R	Cumings	[7426]
Barry	Cummins	[7470]
Jennifer	Cummins	[6682]

John	Cunningham	[7023]
C	Curran	[6397]
John	Curry	[5781]
Jon	Curtis	[7014]
Terase	Curtis	[7443]
Robert	Dagnell	[6325]
Diane	Dagnell	[6326]
Tim	Dalton	[6730]
Claire	Dangan	[7439]
Matthew	Dangell	[6323]
Robert	Dangell	[6313]
Colin	Daniels	[6726]
Graham	Daniels	[6369]
Alison	Daniels	[6370]
Joanne	Darrell	[6215]
Paul	Darrell	[6287]
Hazel	Davey	[7181]
Richard	Davey	[5941]
Alan	David	[6107]
Martin	Davie	[6858]
Craig	Davies	[6888]
Stephen	Davis	[6040]
Neil	Dawson	[7055]
Peter	Dawson	[7031]
Sarah	Dawson	[7032]
E	Day	[6546]
Robert	Day	[6122]
A	De	[6843]
E	De	[6089]
Gwenda	Deal	[6857]
Matthew	Dean	[7168]
F	Deether	[6251]
John	Deether	[6989]
Philip	Degen	[5949]
Karen	Denbow	[7075]
Douglas	Dennis	[6123]
David	Dent	[7045]
J	Denton	[6976]
Frances	Dewsett	[6119]
James	Dickinson	[5986]
Scott	Dickinson	[5984]
Astrid	Dickinson	[5947]
Linda	Dickinson	[5985]
William	Dickson	[6455]
Paul	Dines	[6229]
Angela	Dines	[6230]
Colin	Dingwall	[5924]
J	Dingwall	[6727]
Adele	Dixon	[6652]
Caroline	Dixon	[7006]
Chris	Dixon	[6506]
Edward	Dixon	[6525]
Graham	Dixon	[6796]
Jill	Dixon	[6583]
Laura	Dixon	[7029]
Lynette	Dixon	[6565]
Maria	Dixon	[7005]
Matthew	Dixon	[6612]
Faye	Dixon	[5946]
Paul	Dixon	[7007]

Stanley	Dixon	[7415]
Stephanie	Dodd	[6537]
Barbara	Doherty	[7057]
P	Dollery	[6818]
Peggy	Doman	[7512]
Mr	Donald	[6842]
Mrs	Donald	[7321]
Chris	Donnelly	[6190]
Rachel	Donnelly	[6192]
Susan	Donohoe	[7059]
Lee	Dorman	[6410]
Kay	Douglas	[7024]
Peter	Douglas	[5054]
James	Downing	[7501]
Sarahhelen	Dowse	[6568]
John	Drake	[6737]
Tom	Duckmanton	[6304]
Vivien	Dudley	[6036]
Patrick	Dudley	[7284]
Sheena	Duigenan	[6617]
Ian	Duncan	[5848]
Michael	Dunlea	[6179]
Alan	Dunnage	[6698]
L	Dunnage	[6688]
John	Dunne	[7476]
Judy	Dunne	[5051]
Liam	Dunne	[7474]
Claire	Dunstan	[7239]
Jo	Dunstan	[7243]
Kath	Dunstan	[6733]
Paul	Dunstan	[7244]
Ken	Dunstan	[6587]
Jordan	Durber	[6505]
Philip	Durber	[6619]
Jennie	Durber	[6618]
Christopher	Durman	[7119]
Jack	Durman	[7121]
Molly	Durman	[7120]
Lucy	Durman	[6340]
Nat	Durman	[7122]
Giuseppe	D'Urso	[7283]
P	Dyball	[7541]
Peter	Dyble	[6830]
E	Eastwood	[5972]
James	Eastwood	[7040]
L	Eastwood	[6604]
Noel	Eastwood	[5968]
Rupert	Eastwood	[7004]
Fiona	Eaton	[7376]
James	Eaton	[7378]
John	Eaton	[7377]
Tracy	Eaton	[6965]
Sarah	Edmonds	[6442]
B	Edwards	[6495]
D	Edwards	[6632]
Gruff	Edwards	[6037]
Margaret	Edwards	[7170]
Mary	Edwards	[7248]
Michael	Edwards	[6564]
Anthony	Edwards	[6770]

David	Edwards	[6758]
Stephen	Edwards	[6494]
Beryl	Edwards	[6772]
Edna	Edwards	[6311]
Roy	Edwards	[6986]
Kim	Elaine	[7436]
Ottoline	Elbishlawi	[7607]
Mrs	Elfick-Wood	[6594]
Katharine	Elliot	[6514]
Elizabeth	Elliot	[6854]
Alan	Elliott	[6117]
Susan	Elliott	[6163]
Sarah	Elliott	[6985]
Jon	Ellis	[7527]
Brian	Ellis	[6606]
Joan	Ellis	[6371]
W	Ellis	[7185]
Brian	Elms	[6637]
Guy	Elms	[6749]
Andrew	Elsdon	[6042]
Nina	Elsdon	[7516]
Gareth	Emanuel	[7290]
Linda	Emanuel	[5958]
Muriel	Emanuel	[5957]
Dominic	Emery	[6901]
Keren	Emery	[7335]
Dawn	Emery	[5740]
John	Ensell	[5755]
Richard	Epworth	[6963]
A	Etter	[6096]
Peter	Etter	[5226]
Tony	Evans	[5664]
Adrian	Evans	[7498]
Maureen	Evans	[7442]
Michael	Evans	[6356]
Susan	Evans	[7184]
Laura	Fabiani	[6171]
Laura	Fabiani	[6466]
Derek	Farley	[6853]
Suzanne	Farmer	[7421]
David	Farningham	[5042]
Ken	Faux	[7380]
Michael	Fearn	[7654]
Helen	Feeney	[6706]
Christine	Fells	[6217]
Angela	Felstead	[6721]
John	Felstead	[6528]
Kealy	Felstead	[6722]
Ian	Felstead	[6250]
June	Felstead	[6328]
Elaine	Ferguson	[5991]
J	Field-Bibb	[6387]
Victoria	Fifield	[6253]
Chris	Finch	[6699]
D	Findlay	[7101]
Peter	Findlay	[6508]
P	Finlay	[6763]
Lorraine	Firth	[6750]
Julia	Fisher	[6813]
Pauline	Fitch	[6959]

Harlow Civic Society

RAMCO (Harlow) Ltd

Rebecca		Fitch	[6553]
Ciaran		Fitzgerald	[7105]
Niamh		Fitzgerald	[7104]
Sean		Fitzgerald	[7106]
Suzanne		Fitzgerald	[7107]
R		Flagg	[6551]
Katherine		Fletcher	[4850]
Y		Flowers	[7360]
Amanda		Fordham	[5922]
Craig		Fordham	[5919]
Doris	Evelyn	Fordham	[6182]
Michael		Fordham	[5996]
Ian		Foreman	[6788]
Mrs		Foreman	[6782]
S		Forsyth	[7109]
Diane		Fossey	[7384]
David		Foster	[6882]
John		Foster	[7296]
Terry		Foster	[5955]
Samantha		Foster	[6889]
Nicola		Foster	[6459]
Skye		Foster	[6881]
Harrison		Foster-Butters	[6891]
Bethany		Foster-Butters	[6890]
Matthew		Fowell	[6764]
Robert		Fowell	[6767]
Hannah		Fowell	[6765]
Sally		Fowell	[6766]
Chris		Fox	[6990]
Matthew		Fox	[6914]
Jonathan	& Nina	Fox	[6081]
Julie		Fox	[6352]
Katherine		Fox	[6353]
Rob		Francis	[5812]
Rob		Francis	[7668]
Diane		Franzman	[7433]
Michael		Franzman	[7464]
Rose		Freeman	[216]
Cathy		Freeman	[7252]
Carl		French	[6403]
S		Freshwater	[6808]
Betty		Fricker	[7581]
Michelle		Frost	[6295]
Mauro		Fugazza	[5158]
Diana		Fullbrook	[6900]
Elaine		Furness	[6574]
Andy		Furze	[5688]
Bob		Gabriel	[6919]
Roger		Gaitley	[6153]
Andrew		Gale	[7054]
David		Gale	[5859]
David		Gale	[6533]
J		Gallantree	[6065]
Ian		Gallantree	[6061]
B		Gallantree	[6062]
P		Galoppi	[6221]
Gina		Galoppi	[6284]
Adam		Garwood	[215]
Robert		Garwood	[7276]
Susan		Garwood	[7277]

English Heritage

The Theatres Trust

Historic Environment Branch

Pamela	Gates	[7320]
Paul	Gates	[7440]
Alan	Gatland	[5880]
Janet	Gatland	[5879]
Angus	Gauld	[7564]
Denise	Gauld	[7565]
Finlay	Gauld	[7563]
Matt	Geddes	[6411]
Richard	Geddes	[6851]
Jackie	Geddes	[6876]
Tim	Geddes	[6697]
Rachel	Geller	[7247]
Simon	Geller	[6912]
Victoria	George	[7235]
D	Ghadami	[6424]
Jeremy	Gibb	[6090]
Phillip	Gibb	[5725]
David	Gibbs	[7572]
Linda	Gibbs	[7573]
Emma	Gibson	[7471]
Helen	Giles	[7325]
Ian	Gill	[7494]
Ann	Gillanders	[6402]
B	Gillespie	[5932]
Roy	Gillman	[7293]
Jacqueline	Gillman	[7589]
Kerry	Girolami	[7255]
Mark	Girolami	[7256]
Phil	Gladman	[7576]
Laura	Gleed	[7043]
Kevin	Gleeson	[7160]
D	Goggin	[7315]
Duncan	Goldsby	[5916]
Ian	Goldsmith	[6920]
Ruth	Gonzalez	[6327]
Chris	Gooch	[7295]
Judy	Gooch	[7294]
Doreen	Goodall	[5805]
Christopher	Goodbody	[6870]
Denise	Goodchild	[6609]
Trevor	Goodey	[7217]
Paul	Goodman	[6132]
Juliette	Goodwin	[6558]
Sean	Goodwin	[7282]
T	Goody	[6826]
Robin	Goodyear	[6829]
David	Gould	[5901]
David	Graham	[5886]
Ann-Marie	Grant	[4896]
Mark	Grant	[6405]
Robert	Grant	[6120]
Karen	Graves	[6728]
Richard	Greaves	[5555]
Angela	Green	[6734]
Ava	Greenwell	[6541]
John	Greenwood	[6650]
M	Greenwood	[6657]
Jennifer	Greenwood	[6674]
Julia	Gregory	[4726]
John	Gregory	[6164]

West Essex Primary Care Trust

Stansted Airport Limited

T	Gregory	[6141]
L	Gregory	[6187]
Philip	Greswell	[7510]
Kevin	Griffin	[6744]
Ian	Griffiths	[7579]
Paul	Griffiths	[6945]
Doreen	Grocott	[6645]
Michael	Grocott	[6656]
Rhoda	Grocott	[6335]
Tiziana	Groom	[5700]
Robert	Groves	[5840]
Kevin	Growden	[6483]
Ramesh	Gulrajani	[7002]
Chris	Gurry	[6519]
Denis	Gurry	[6521]
Gary	Gurry	[6513]
Norma	Gurry	[6517]
Peter	Haagensen	[5959]
Janet	Haley	[6479]
Janet	Hall	[6202]
John	Hall	[6203]
Philippa	Hall	[6257]
Sally	Hall	[6936]
Karen	Hambro	[6301]
Thomas	Hamilton	[6593]
Roget	Hamlett	[6460]
Shaun	Hammond	[6883]
Alan	Hampton	[6367]
Patricia	Hampton	[7608]
Mark	Hancock	[6008]
H	Hancock	[7634]
K	Hancock	[7172]
Patricia	Hannaford	[7231]
Richard	Hannah	[5938]
Ian	Happe	[6671]
D	Harman	[7069]
V	Harris	[7082]
G	Harris	[6532]
Steve	Harris	[6043]
G	Harris	[6531]
Susan	Harris	[6575]
Diana	Harrison	[5980]
Sally	Hart	[6649]
Elizabeth	Harvey	[6832]
Linda	Harvey	[7317]
Kathleen	Hastings	[6225]
Allan	Hatch	[6526]
David	Hatch	[6798]
Patricia	Haupt	[6398]
Roger	Havard	[7603]
Donna	Hawkins	[7125]
Jeff	Hawkins	[6560]
Steve	Hawkins	[6935]
Treena	Hawkins	[6561]
S	Hawryskiw	[7228]
Ron	Hawthorne	[6112]
Helen	Hawthorne	[6111]
Vivienne	Hayes	[7180]
Carol	Hayward-Peel	[6792]
Steven	Hearn	[6630]

Harlow Citizens Advice Bureau

W	Hebblewhite		[7081]
William	Heelan		[7205]
Judy	Heilpern		[7117]
Dawn	Helder		[6416]
Linda	Helm-Manley		[7333]
Dean	Hemmings		[6333]
Jason	Hemmings		[6713]
Junko	Hemmings		[6330]
Vivienne	Hemmings		[6714]
Tony	Hemmings		[6646]
William	Henderson	HOOP	[4968]
Janet	Henderson		[7118]
E	Henderson		[6605]
James	Henderson-Gibb		[6091]
Georgiana	Henderson-Gibb		[6092]
Margaret	Henderson-Tew		[6093]
Hazel	Henniker-Horn		[7216]
Caroline	Henry		[6262]
Alan	Henson		[5063]
K	Henson		[7201]
Hanna	Hessling		[6135]
Gordon	Hewlett		[6012]
Kate	Hicks		[6498]
Kevin	Higgs		[7628]
Kevin	Higgs		[5760]
Kim	Higgs		[5802]
D	Hilditch		[6453]
Peter	Hill		[6841]
Ian	Hill		[7399]
J	Hiller		[7450]
Linda	Hilton		[6150]
A	Hinkin		[7211]
Richard	Hinton		[5994]
Joy	Hoare		[6783]
Paul	Hodgkinson		[6429]
Louise	Hodgkinson		[6430]
Angela	Hodgson	Harlow Baptist Church	[459]
Alan	Hodgson		[5900]
Keith	Hodgson		[5865]
Georgina	Hofer		[6903]
Pat	Holder		[7485]
Richard	Holder		[7484]
Simon	Holder		[6576]
Jean	Hollylee		[5122]
Roger	Hollylee		[6615]
Tom	Hollylee		[7499]
Steven	Hollyman		[6817]
Ann	Holt		[7517]
Ian	Holt		[7521]
Michael	Holway		[6392]
Tim	Holway		[6391]
Lois	Holway		[5954]
Madeleine	Holway		[6076]
Sue	Holway		[6390]
Chris	Homewood		[6802]
John	Hopton		[7327]
P	Hopton		[5975]
Andrea	Horner		[7406]
Joe	Horsley		[7633]

Sally		Hoskins		[6337]
P		Hough		[7667]
Peter		Hough		[5813]
Anne		How		[6659]
D		Howard		[6239]
Gary		Howard		[6725]
M		Howard		[6582]
Sandra		Howard		[6118]
Michael		Howarth		[5049]
Antoinette		Howarth		[6047]
Kirsty		Howden		[6103]
Alastair		Howe	Alastair Howe Architects	[3351]
Janet		Howes	Redeemer Lutheran Church	[464]
Ian		Hudson	Copyzone Archiving Ltd	[5684]
David		Hughes		[6980]
Marcus		Hughes		[6048]
Margaret		Hughes		[5105]
Sylvia		Hughes		[6600]
Margaret		Hulcoop		[65]
David		Hunt		[6972]
Susan	& David	Hunt		[6824]
Susan		Hunt		[6958]
Daniel		Hurst		[7236]
Claire		Hutchinson	PWLL Consortium	[7644]
Jacqueline		Hutchinson		[7291]
Jennifer		Hutchinson		[6731]
M		Hutchinson		[6286]
Margaret		Hutt		[6859]
Janice		Hyde		[7424]
Chris		Hyland		[7139]
G		Hyland		[6757]
Jutta		Ignatiou		[6016]
Eleftherios		Ignatiou		[6015]
Veronica		Iliffe		[7366]
C		Ings		[7466]
Zeana		Instance		[7400]
Carl		Inwood		[7161]
Barbara		Ireland		[6158]
David		Irons		[6577]
Graham		Irwin		[7275]
R		Irwin		[7445]
B		Jaafar		[7091]
E		Jaafar		[7090]
J		Jaafar		[7089]
M		Jaafar		[7088]
Charles		Jackson		[6100]
S		Jacobs		[7209]
Adrian		James		[7354]
David		James		[6924]
Trevor		James		[6562]
Alexandra		Jane		[6877]
Eleanor		Jane		[7487]
Flora		Jane		[7372]
Peter		Jarman		[7337]
Pru		Jarman		[7336]
R	A	Jarvis		[6747]
S	A	Jarvis		[6748]
Mr		Jay		[7595]
Gary		Jeffery		[7423]
Barbara		Jeffrey		[6520]

R		Jenkins	[7515]
Clare		Jenkins	[5988]
Sam		Jenkins	[6064]
Teresa		Jenkins	[6790]
Ashley		Jennings	[6666]
John		Jewell	[6168]
Paul		Joghee	[6476]
Laurie		John	[5896]
Andrew		John	[7533]
Christopher		Johnson	[6324]
Gloria		Johnson	[7432]
Andrew		Johnston	[7549]
M		Jolley	[7371]
David		Jolley	[6415]
B	T	Jones	[6418]
Catherine		Jones	[7026]
Cathleen		Jones	[6701]
Gillian		Jones	[7072]
Glyn		Jones	[7019]
Joan		Jones	[5892]
Moira		Jones	[5031]
Paul		Jones	[6354]
Trevor		Jones	[6365]
Emily		Jones	[7611]
Emmer		Jones	[6382]
Jane		Jones	[6383]
Melanie		Jones	[6381]
Simon		Jones	[6993]
B		Jordan	[6542]
Keith		Jordan	[7111]
Emily		Jordan-Wilson	[5971]
Sarah		Jowett	[6053]
Lee		Joyce	[6138]
Emma		Juniper	[7374]
Michael		Jury	[6178]
Marcus		Karn	[5965]
Madeleine		Karn	[5930]
Caroline		Karsten	[7567]
Edward		Karsten	[7561]
Peter		Karsten	[7559]
Robert		Karsten	[7560]
Jean		Kay	[6261]
Ray		Keane	[6805]
James		Keir	[5830]
Roger		Keith	[6573]
M		Kelly	[5935]
John		Kelly	[7367]
Peter		Kelsey	[7292]
Peter		Kelsey	[6718]
Barbara		Kemmett	[6051]
Suzanne		Kennard	[7233]
Shirley		Kenworthy	[6595]
Stan		Kenworthy	[6496]
A		Kilbee	[7546]
K		Kilbee	[7548]
Aileen		Kilbee	[7547]
Stephanie		Kimble	[5831]
Peter		King	[6025]
David		King	[6778]
David		King	[6789]

Essex Electrical Contracts

Joanna		King	[6320]
Judy		King	[6307]
Margot		King	[6248]
Samantha		King	[6050]
Paul		Kirkby	[5772]
P		Kitchen	[7349]
David		Kitching	[6224]
Chris		Kitts	[6668]
Vassilios		Kladaras	[6809]
Stephanie		Klidaras	[6524]
Daniel		Knight	[6130]
Esther		Knight	[7174]
Frankie		Knight	[6129]
Gillian		Knight	[6029]
Gracie		Knight	[7041]
Lauren		Knight	[6642]
Matthew		Knight	[6206]
Ritchie		Knight	[6641]
Rosie		Knight	[6205]
Angela		Kurton	[5811]
Marek		Kwiecinski	[5937]
Peter		Lainson	[92]
D		Lake	[7316]
Jean		Lambert	[6033]
John		Lambie	[6911]
Sue		Landon	[6760]
David		Langhelt	[6443]
M		Langman	[6849]
Roy		Langman	[6270]
O		Langman	[6884]
R		Langman	[6885]
S		Langman	[6886]
Steven		Langman	[6186]
Tony	& Jackie	Langsdale	[6621]
Christine		Lapidge	[5923]
Roger		Lapidge	[6115]
Natalie		Larkin	[7551]
Jacqui		Law	[6946]
Joan		Law	[7049]
Michael		Law	[6643]
Philip		Law	[6241]
Nick		Law	[6836]
Maurice		Lawrance	[7528]
M		Lawrancee	[7141]
David		Lawson	[6177]
Jennifer		Lazell	[7605]
Christine		Le	[6952]
Alan		Le	[6317]
Nick		Lee	[7639]
Barry		Lee	[7258]
Heather		Lee	[6724]
P		Lee	[6683]
J		Lee	[6493]
Joanne		Lee	[6242]
Patricia		Lee	[7402]
Judith		Leigh	[7147]
Roger		Leigh	[7165]
Patrick		Leng	[6863]
Barbara		Leslie	[6409]
Martyn		Lewington	[7280]

Harlow Area Access Group

Dooba Investments VI Ltd

Thomas		Lewington		[7602]
Katherine		Lewington		[7601]
Sylvia		Lewis		[7008]
Corinne		Lewis		[6413]
Paul		Lewis		[7012]
M		Lilley		[7050]
A	E	Linnit		[7636]
Dawn		Lloyd	Environment Agency	[7604]
John		Lloyd		[5885]
Pauline		Lloyd		[5858]
A		Locke		[7301]
Michael		Lodge		[6226]
E		Lodge		[6302]
Janet		Lodge		[6296]
Georgina		Loftus		[7154]
Mike		Loftus		[7036]
Maxine		Loftus		[7355]
Claire		Lomax		[5872]
Harry		Long		[7153]
Rhona		Long		[7152]
Steve		Long		[7149]
Yvette		Lord		[6923]
Ellie		Louise		[7342]
Adam		Lowe		[6104]
Treena		Lowe		[6228]
Lesley		Lowers		[6308]
R		Lowers		[6210]
Frances		Luck		[7222]
Peter		Luck		[6310]
Karen		Lydia		[6850]
R		Mabey		[6329]
Barbara		Mackay		[6277]
Terry		Mackay		[6279]
Cameron		Mackenzie		[6806]
Stephanie		Madsen		[6774]
Jill		Maher		[7021]
Paul		Maher		[5058]
Paul		Maison	British Waterways	[146]
Janice		Makin		[7206]
John		Makin		[6610]
Richard		Makin		[5962]
Lisa		Makin		[5963]
Rebecca		Makin		[7566]
The		Manager	Apollo Specialist Engineering	[3383]
The		Manager	Edmonson & Fountain	[6678]
The		Manager	Residents Orchard House	[6934]
Paul		Manley		[7332]
P		Mann		[7056]
C	S	Mansbridge		[6439]
Neil		Mantell	Redrow Homes	[7655]
Andrew		Mark		[6752]
Revd		Mark		[7422]
Gordon		Marks		[6740]
John		Marks		[6020]
Toby		Marks		[6629]
W		Marks		[6831]
Wenna		Marks		[6140]
Nicholas		Marks		[7460]
Toby		Marks		[7459]
Caroline		Marsh		[6893]

Muriel		Marshall		[7386]
Caroline		Marston		[7382]
Colin		Marston		[7383]
Jim		Martin		[7137]
Richard		Martin		[6417]
Sheila		Martin		[7156]
Luigi		Martini		[6218]
N		Mascall		[7009]
Wendy		Maskell		[7486]
David		Mason		[7063]
Leann		Mason		[6559]
Danielle		Mason		[6247]
Diane		Matt		[7627]
Diane		Matt		[5806]
Elias		Mavrommati		[6567]
Edward	& Ethel	Mawdsley		[6009]
Toni		Max		[7281]
Gillian		May		[6742]
Hilda		May		[6021]
Regina		May		[6679]
Joyce		May		[6148]
Janet		Mayes		[7417]
Henry		Mayes		[7200]
Jemima		Mayes		[7197]
Lydia		Mayes		[7198]
Sarah		Mayes		[7199]
Brian		Mayhew	Dale Insurance Services	[5895]
Patricia		Mayhew		[5810]
Robin		McCartney	Churchgate Street Residents Association	[5539]
Ken		Mcdonald		[7204]
S		Mcdonald		[6693]
G		Mcdonald		[6703]
M		Mcdonald		[6695]
M		Mcdonald		[6702]
I		Mcfayden		[6779]
Matthew		Mcgill		[7314]
Jo		Mcgill		[7183]
Graham		Mcisaac		[7375]
Paula		McManus		[6293]
Hugh		Mcmanus		[7392]
Nicola		Mcmanus		[6793]
Neil		McManus		[6290]
John		Mcmillan		[6238]
Scott		Mcnamee		[7469]
Leighanne		Mcnaught		[6880]
Hazel		Mead		[6899]
John		Mead		[6035]
Claudia		Mead		[7405]
Margaret		Mead		[6155]
Jean		Meakin		[6616]
Andy		Medhurst		[7387]
Caroline		Meehan		[6917]
D		Meehan		[6913]
C		Meehan		[7497]
Adam		Meldrum		[6636]
Bernard		Mella		[5913]
Jacqueline		Mella		[5914]
A	D	Mella		[6454]
Gillian		Melling		[6087]
Fiona		Menzies		[5832]

Jeannette	Mercer	[6134]
Sean	Mercer	[6133]
Jacqueline	Mermoud	[5926]
Steven	Meshor	[6342]
Jan	Metcalf	[6654]
Francesca	Micheli	[6359]
M	Michelson	[6691]
H	Michelson	[6700]
	Middlebrook	[7272]
Amanda	Middleton	[6669]
Andrea	Middleton	[6712]
Laura	Middleton	[6709]
Megan	Middleton	[6710]
C	Middleton	[7046]
D	Middleton	[7190]
Harry	Middleton	[6711]
C	Middleton	[7189]
Annmaria	Miechielsens	[7598]
Christopher	Millard	[7495]
Kim	Millard	[7518]
Ray	Millard	[7249]
Nigel	Miller	[6041]
Simon	Miller	[6557]
Faith	Mills	[6146]
Malcolm	Mills	[6149]
Craig	Milosh	[6348]
Nebojsa	Milovanovic	[6267]
Joseph	Mishan	[6867]
Nina	Mistry	[6219]
Francis	Mitchell	[6591]
Madeleine	Mitchell	[5966]
Olivia	Mitchell	[5931]
Helen	Mitchell	[5927]
S	Mitchell	[6681]
Jennie	Moncur	[7142]
Lorna	Montgomerie	[6276]
Nick	Moore	[7318]
Steph	Moore	[7016]
Stevie	Morden	[5221]
Danny	Morgan	[7044]
Jacqueline	Morgan	[6339]
Keith	Morgan	[7328]
Dianne	Morgan	[6667]
Esther	Morgan	[7306]
Ronald	Morgan	[7537]
Suzanne	Morgan	[7553]
Alan	Morley	[7102]
Sheila	Morley	[6672]
Blaise	Morris	[6108]
Mark	Morris	[7278]
Melanie	Morris	[6956]
Felix	Morris	[6477]
Gwyn	Morris	[5185]
Jemima	Morris	[6478]
Kathleen	Morris	[5080]
Susanna	Morris	[6237]
Philip	Morris	[6955]
Lucy	Morris-Eyton	[7409]
Brenda	Morrison	[6941]
John	Morrison	[6940]

Keira		Morrison	[6019]
John		Morrison	[6704]
Mr		Morrison	[7253]
Robert		Morrison	[6393]
B		Morrison	[6784]
Mrs		Morrison	[7254]
Colleen		Morrison	[5674]
David		Morton	[6139]
Jamie		Morton	[7323]
Jeremy		Morton	[6736]
J		Morton	[6833]
J		Moseley	[6608]
Ian		Moss	[7188]
Marion		Moss	[6222]
Rodney		Munday	[6511]
Nicola		Munday	[7505]
Richard		Munday	[7155]
Katherine		Munro	[7698]
Andrew		Munro	[6777]
Brian		Munro	[6540]
Deborah		Munro	[6846]
Philip		Murphy	[7657]
Becca		Murphy	[6868]
Alison		Murray	[7599]
John		Mustafa	[5016]
John		Mustafa	[5678]
B		Mutter	[7329]
Juliet		Nabavi	[7017]
Gordana		Najdanovic	[6265]
Jackie		Nash	[6142]
Jane		Nathan	[5989]
Alan		Naughton	[7011]
Carmel		Naughton	[7010]
Alan		Naughton	[6795]
Sally		Naylor	[5259]
David		Needham	[7396]
Suzanne		Neville	[7070]
Graham		Newell	[6974]
Arthur	Stanley	Newens	[5917]
Sandra		Newens	[5918]
Thomas		Newens	[5899]
M		Newitt	[6601]
Amanda		Newman	[7434]
Lorraine		Newman	[6585]
Ben		Newman	[6245]
Rachel		Newman	[5934]
Tina		Newman	[6246]
Pamela		Newman	[6176]
Victoria		Newman	[7584]
Mike		Newton	[7646]
Hedley		Newton	[7506]
Linda		Newton	[6166]
Marco		Newton	[7297]
Kay		Newton	[5942]
Paul		Newton	[5871]
Virginia		Newton	[7461]
J		Nicholls	[6243]
Charles		Nicholson	[6406]
M		Nicholson	[7300]
Diana		Nicholson	[6343]

MRB Services Ltd

Hertfordshire Biological Records Centre

Harlow North Joint Venture (HNJV)

Mulberry Green Residents Association

Roydon Road Residents Association

Hallam Land Management & Commercial Estates Group

Esther		Nicklin		[6396]
Edward		Nightingale		[7568]
Kaye		Nightingale		[7570]
Eric		Nimalan		[6264]
Cedric		Nimmo		[6957]
Edward		Noakes		[6988]
Ruth		Noakes		[6814]
Barbara		Noble		[5680]
Bryan		Norman		[6485]
Sandra		Norris		[7114]
Sara		Norris		[7115]
Robert		Norris		[5852]
S		Norris		[7113]
G		Norris		[7112]
Sandra		Norris		[5851]
Carly		Norton		[6145]
Lynn		Norton		[6180]
Andrew		Noton		[5860]
Iain		Nuttall		[6193]
Mrs & Mrs		Nuttall		[6266]
Caroline	& Neile	Oakley		[6173]
Zhanine		Oates	Essex County Council	[5406]
Suzanne		O'Brien		[6773]
Anthony		O'Connor	Moat Homes	[5737]
Anthony		O'Connor		[6660]
Glenda		O'Dowd		[7479]
Richard		O'Dowd		[7472]
Abigail		O'Dowd		[7390]
Emily		O'Dowd		[7404]
Shaun		O'Dowd		[5077]
Jake		O'Gorman		[6432]
Natalie		O'Leary		[6189]
Amanda		Olsen		[6676]
Jill		O'Neill		[6285]
Kevin		O'Neill		[6023]
James		Ord		[6686]
Hugh		O'Reilly		[6504]
Luke		O'Reilly		[6622]
Margaret		O'Reilly		[6503]
Peter		O'Reilly		[6136]
Michael		Orsbourn		[5821]
Mark		Orson	Eastwick and Gilston Parish Council	[7610]
Mark		Orson		[5979]
Christina		Orson		[5982]
Sarah		Orson		[7477]
Jackie		Osborne		[6598]
Clare		O'Shea		[6692]
Frank		O'Shea		[6106]
Matthew		O'Shea		[6283]
Karen		Osterley		[7373]
Robin		Osterley		[7468]
Wil		Overton		[7408]
B		Oxenbridge		[7094]
D		Oxenbridge		[7096]
Emma		Oxenbridge		[7097]
F		Oxenbridge		[7093]
J		Oxenbridge		[7092]
Max		Oxenbridge		[7274]
Oliver		Oxenbridge		[7098]
S		Oxenbridge		[7095]

Seb		Oxenbridge	[7273]
Melvyn		Page	[6589]
Thomas		Page	[6840]
Trevor		Paice	[6095]
Agnes		Pain	[6275]
Martin		Paine	[5682]
Howard		Palmer	[7478]
Ruth		Palmer	[7631]
Arthur		Pape	[7068]
Brenda		Pape	[7066]
Sa		Papworth	[7138]
Douglas		Parfett	[6109]
Jane		Parfitt	[7129]
Jordan		Parfitt	[7146]
Poppy		Parfitt	[7128]
Stuart		Parfitt	[7130]
Anthony		Parish	[6860]
Martin		Parker	[6754]
Matthew		Parker	[6755]
Michael	& Jeffery	Parker	[7672]
Stephen		Parker	[5827]
Rebecca		Parker	[5826]
Holly		Parker	[6756]
David		Parkin	[7003]
J		Parkinson	[7410]
John		Parrott	[6827]
Malcolm		Parrott	[6603]
Kelly		Parrott	[6614]
Jacqueline		Parsons	[7534]
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East Herts. District Council

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Marina	Richards	[6822]
Michael	Richards	[6471]
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Hunsdon Parish Council

Persimmon, Taylor Wimpey & Martin Grant Homes

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J	I	Scally	[6128]
Nick		Scarr	[7401]
J		Schlenker	[7407]
Peter		Schroeder	[6515]
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Janice	Trant	A-Eleven Publications	[5903]
Mark	Trant	M. T. Garden Services	[5906]
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Jonathan	Tritton		[6486]
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Damien	Turley		[5690]
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Claire		Wren		[7196]
Lee		Wren		[7232]
Marjorie		Wren		[6144]
David		Wright	Memorial University of Newfoundland - Harlow Campus	[6014]
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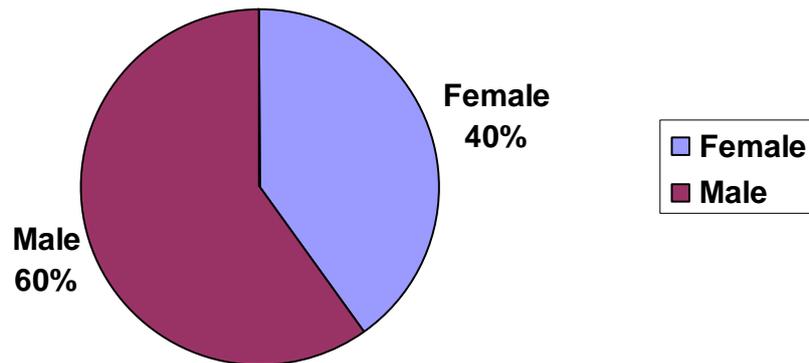
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Lewis		[7597]
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Belinda		[6745]
Deborah		[6094]

Appendix 5 - Demographic Monitoring Results

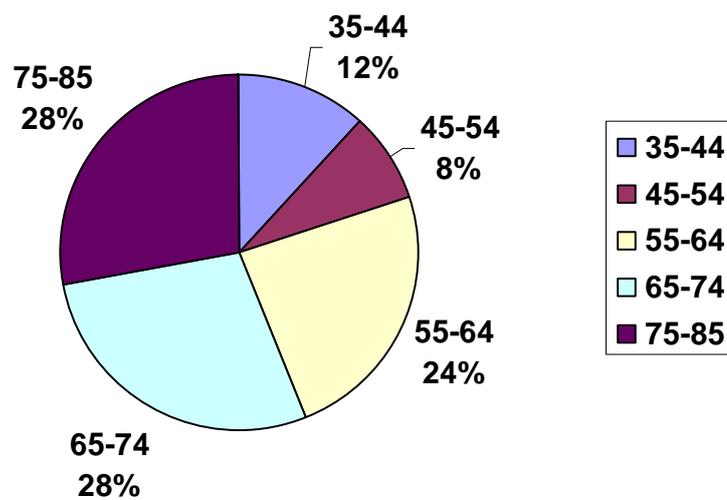
Appendix 5.0 Demographic Monitoring results

This section provides a demographic analysis of the 26 (1.34%) of respondents who chose to complete the optional Equalities Monitoring Form published with the Questionnaire.

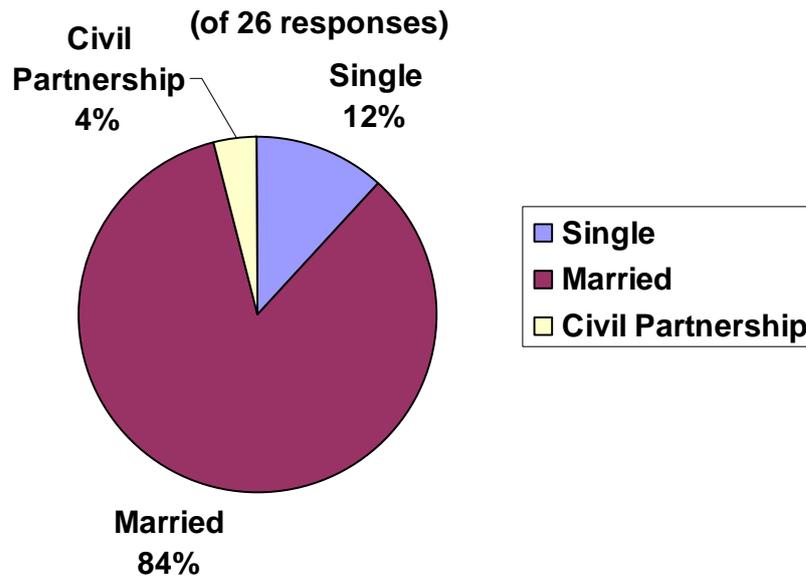
Are you Male or Female? (of 26 responses)



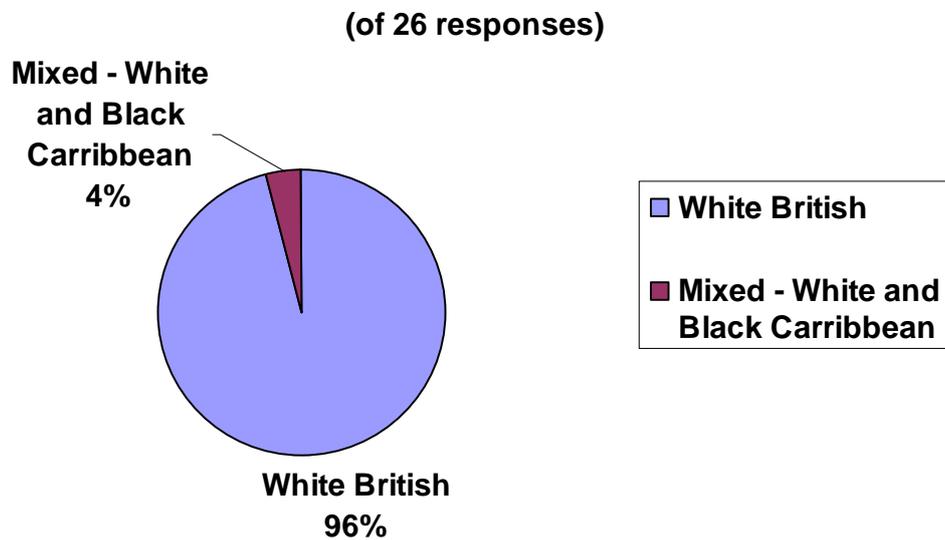
Which age group do you belong to? (of 26 responses)



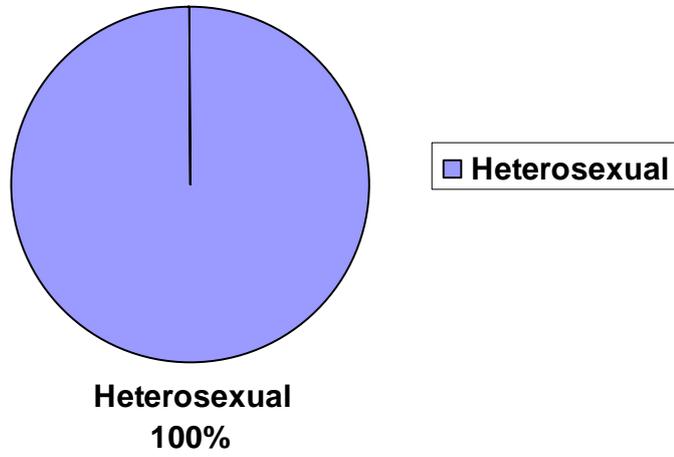
What is your Marital Status?



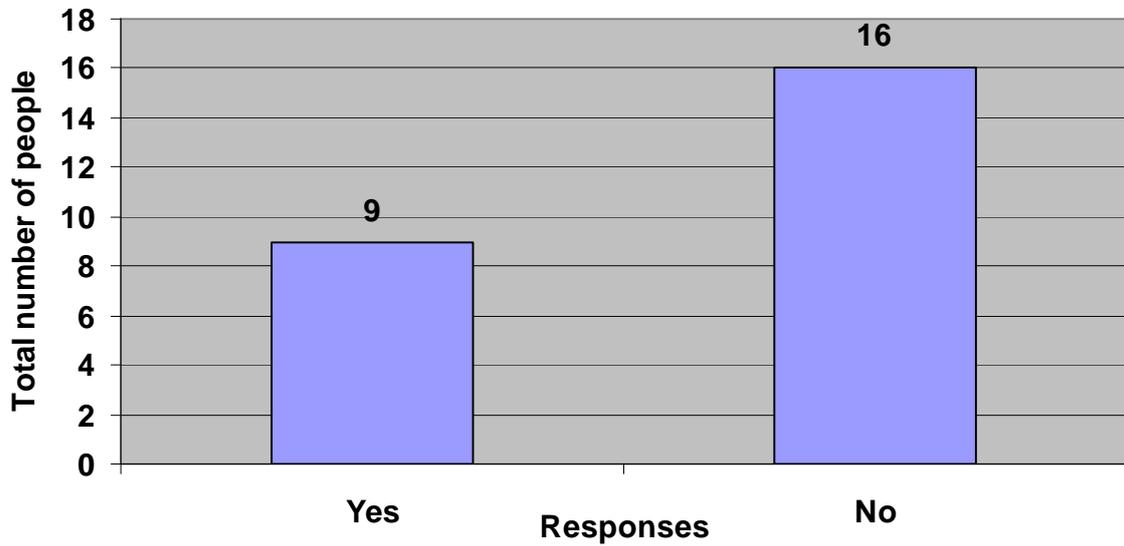
How would you describe your race/ethnicity?



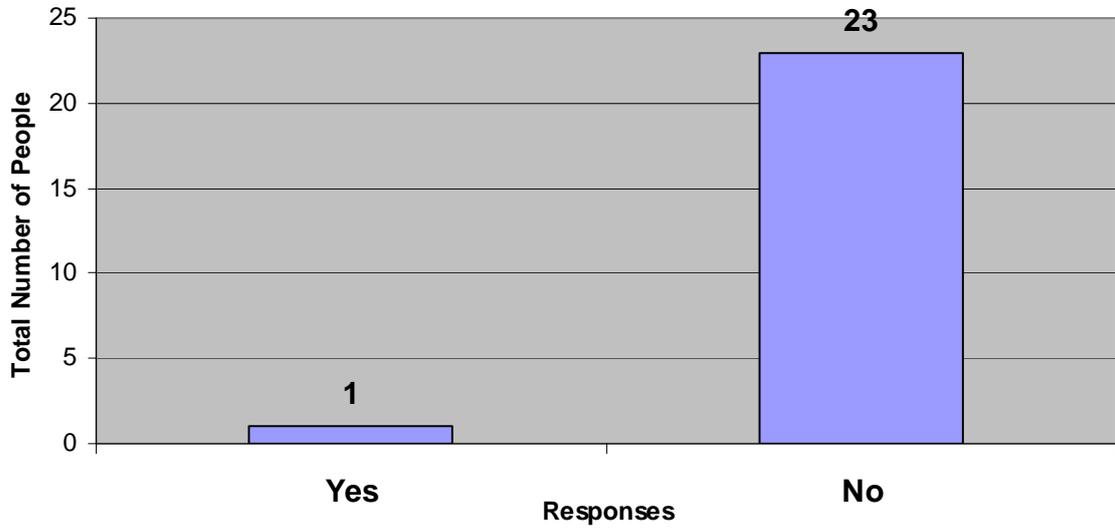
How would you describe yourself?
(of 26 responses)



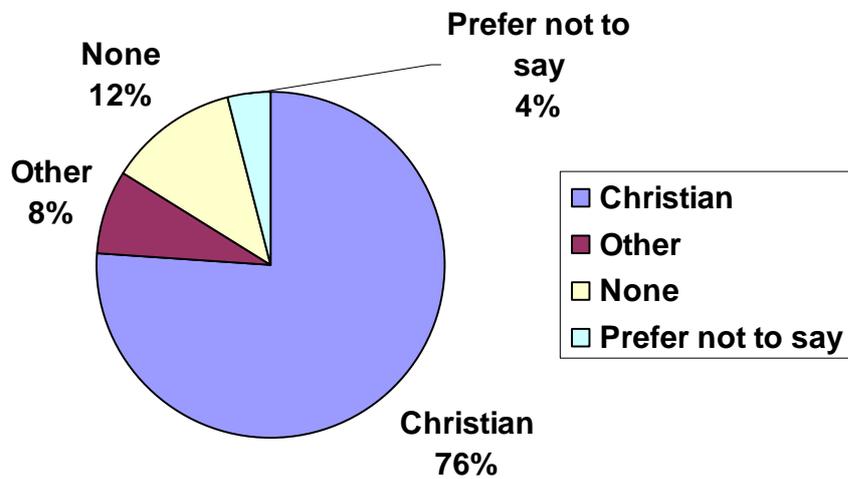
Do you consider yourself to have a physical or sensory impairment or disability?
(of 26 responses)



Do you consider yourself to have a mental impairment or disability?
(of 26 responses)



Which religion do you belong to?
(of 26 responses)



Appendix 6 - Harlow Youth Council Workshop Results

Appendix 6.1 Harlow Youth Council Workshop Results

This section provides a record of the feedback received from the 'Issues and Options' workshop held on 17 January 2011 with the Harlow Youth Council.

A decision was taken to hold a workshop with the Youth Council during the Issues and Options consultation period as an additional consultation activity in order to help ensure that Harlow's future generation were engaged with, and had an opportunity to comment on, the Issues and Options consultation. Bespoke letters and information packs were also sent to local schools and to Harlow College to ensure young people in the town were aware of the consultation exercise.

The purpose of the workshop

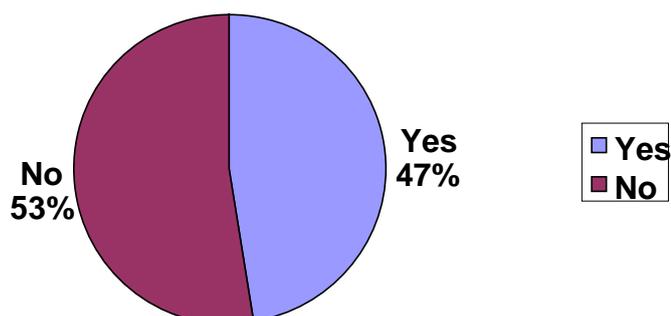
The aim of the Youth Council Workshop was to gather young people's views on a range of issues related to the questions that were contained in the Issues and Options consultation document. Whilst the feedback received from the workshop cannot be formally taken into account as part of the Issues and Options consultation results, the feedback is still valuable as it provides further evidence of the views of Harlow's young generation as to the issues that need to be addressed in Harlow which, in turn, will help to shape the potential options for addressing these problems through the Core Strategy.

18 Youth Councillors attended the consultation workshop which was held in the Civic Centre in Harlow Town Centre. The workshop began with a short presentation by the Council's Forward Planning Team explaining the purpose of the Issues and Options consultation and some of the development issues identified within the consultation document gathered from previous consultation events. A copy of the presentation given to the Youth Councillors can be viewed in Appendix 6.2. A carefully crafted workshop was then undertaken to gather feedback from the Youth Councillors on a range of issues that need to be addressed in the town through the Core Strategy including housing, traffic congestion, employment opportunities, the provision of green spaces and improvements to the Town Centre. A summary of the results from the workshop is provided below.

Workshop results

Question 1 – Do you like living in Harlow?

Question 1: Do you like living in Harlow?
(19 responses)



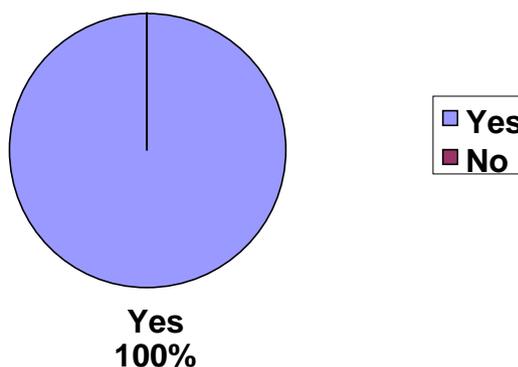
19 Youth Councillors answered this question. Nine stated that they liked living in Harlow compared to ten who stated they did not. The reasons given by those who stated that they liked/disliked living in Harlow are given below:

Reasons given for why Harlow is a good place to live	Reasons given for why Harlow is a bad place to live
<ul style="list-style-type: none"> • Good reputation • Good location • Good schools • Convenient for shopping • Useful green space • Their friends live in the town 	<ul style="list-style-type: none"> • Bad reputation • Economically deprived • Boring • Pollution • Litter • Teenage pregnancy

Question 2 – Would you like to live in Harlow when you are older?

Question 2: Would you like to live in Harlow when you are older?

(11 responses)



The 11 Youth Councillors who responded to this question all stated they would like to live in Harlow in the future. Reasons given for this included ‘family’, ‘familiarity’ and ‘commuting’. The Youth Councillors also felt that Harlow offers more employment opportunities than elsewhere and less ‘hustle and bustle’ than places like London. Furthermore, they stated they saw the new university building as being a positive development for Harlow.

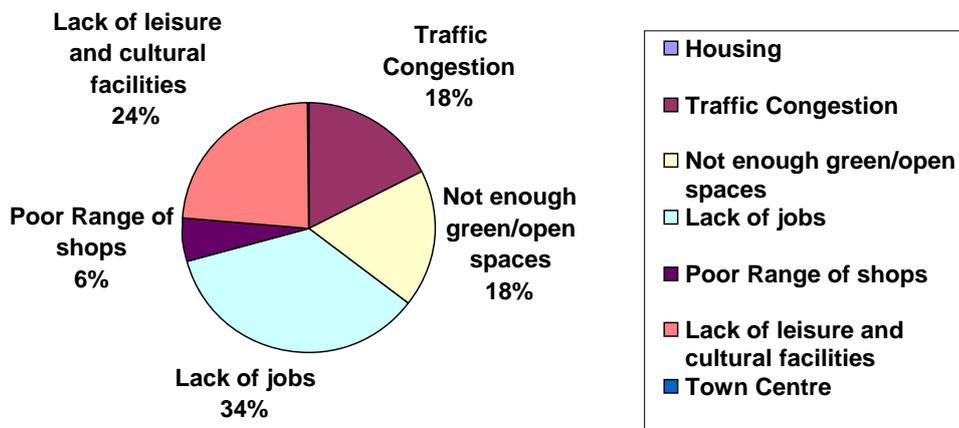
Question 3 – What do you think is the biggest problem in Harlow?

For Question 3, seven frequently identified issues facing Harlow were presented to the Youth Councillors and they were then asked to vote for which one they felt was the biggest needing to be addressed. 17 Youth Councillors responded to this question. The results are provided on the following page.

‘Lack of jobs’ (5) and ‘lack of leisure and cultural facilities’ (4) received the most votes followed by ‘traffic congestion’ and ‘lack of green spaces’ which each received 3 votes. Only one Youth Councillor voted for ‘poor range of shops’ whilst ‘housing’ did not receive any votes.

Question 3: What do you think is the biggest problem in Harlow?

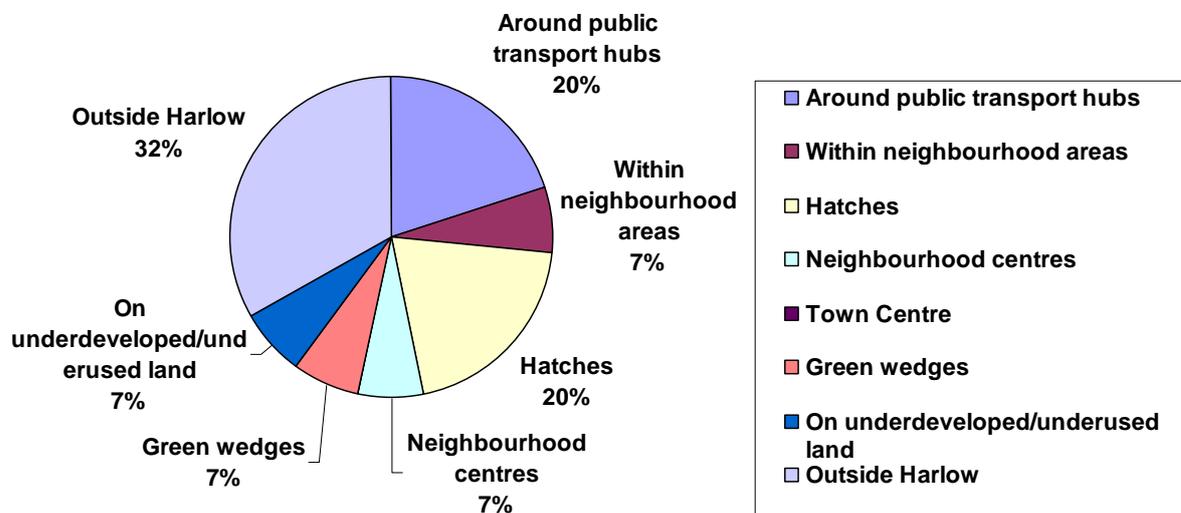
(17 responses)



Question 4 – if new homes are needed, where should they be built?

Question 4: If new homes are needed, where should they be built?

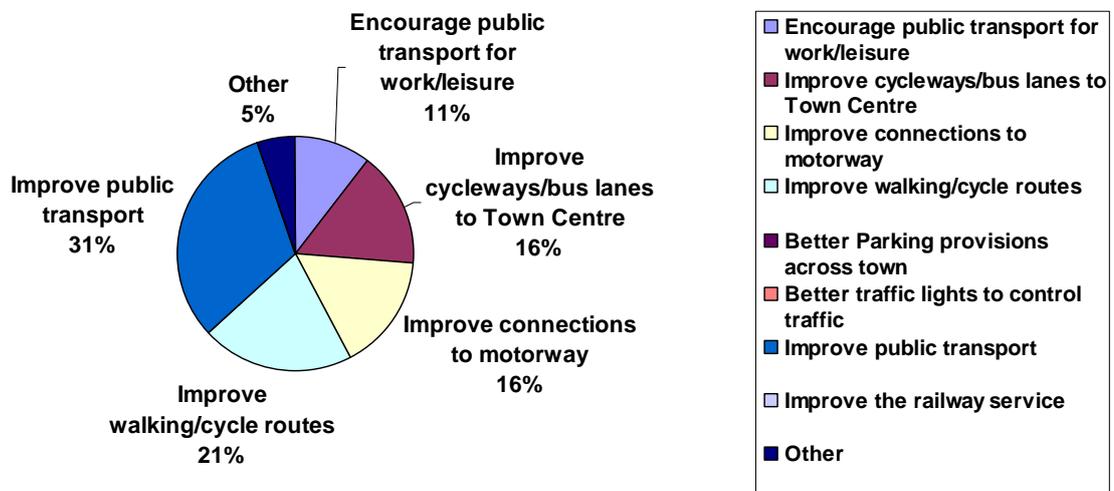
(15 responses)



Eight possible locations where new houses could be built were presented to the Youth Councillors who were then asked to vote for which one they thought would be the most suitable approach. 15 Youth Councillors responded to this question. ‘Outside Harlow’ received the most votes (8), followed by ‘hatches’ and ‘around public transport hubs’ which each received 3 votes. All remaining options each received a single vote with the exception of the Town centre which received none.

Question 5 – How do you think Harlow’s congestion problems should be solved?

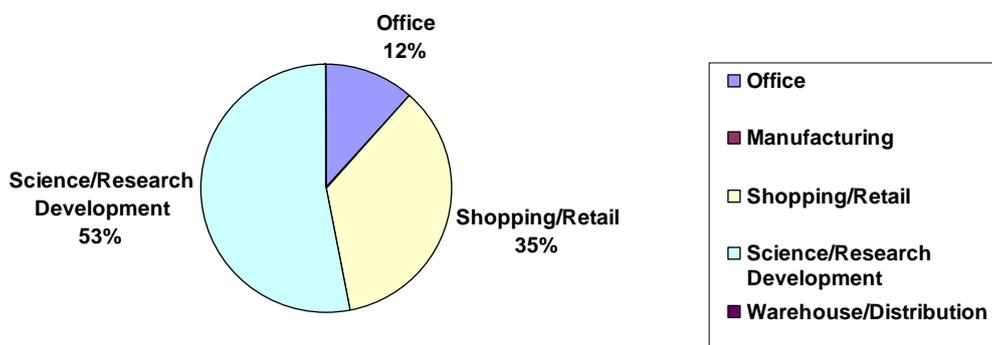
Question 5: How do you think Harlow's congestion problems should be solved? (19 responses)



None possible options for solving Harlow’s traffic congestion problems were presented to the Youth Councillors who were then asked to vote for which one they thought would be the most suitable intervention. 19 Youth Councillors responded to this question. The most popular options were ‘improvements to public transport’ and ‘improvements to walking/cycle route’ which received six and four votes respectively. Improvements to cycleways and bus lanes to the Town Centre’ and ‘improved connections to the Motorway’ were the next most popular options, each receiving 3 votes, whilst measures to encourage people to use public transport for work/leisure received two votes. One youth Councillors voted for the ‘other’ option but did not state what that option could be.

Question 6 – What sort of jobs should be available in Harlow?

Question 6: What sort of jobs should be available in Harlow? (17 responses)

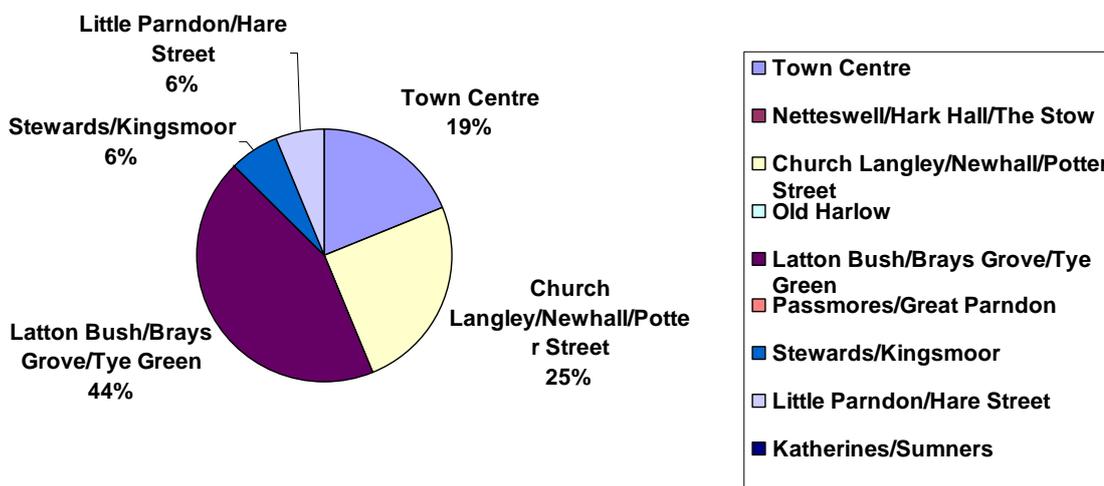


Question 6 sought the youth Councillors’ views on the types of jobs they would like to see available in Harlow in the future. 17 Youth Councillors responded to this question. More than half of the Youth Councillors (9) thought that Harlow should be a location for ‘science/research development’ related jobs.

There was also support for Harlow being a location for ‘shopping/retail’ jobs (5 votes) and ‘office’ related jobs (3 votes). No Youth Councillors thought that Harlow should be a location for manufacturing or warehouse/distribution related jobs.

Question 7 – Which areas of the town require better quality green spaces?

Question 7: Which areas in the town require better quality green spaces? (16 responses)



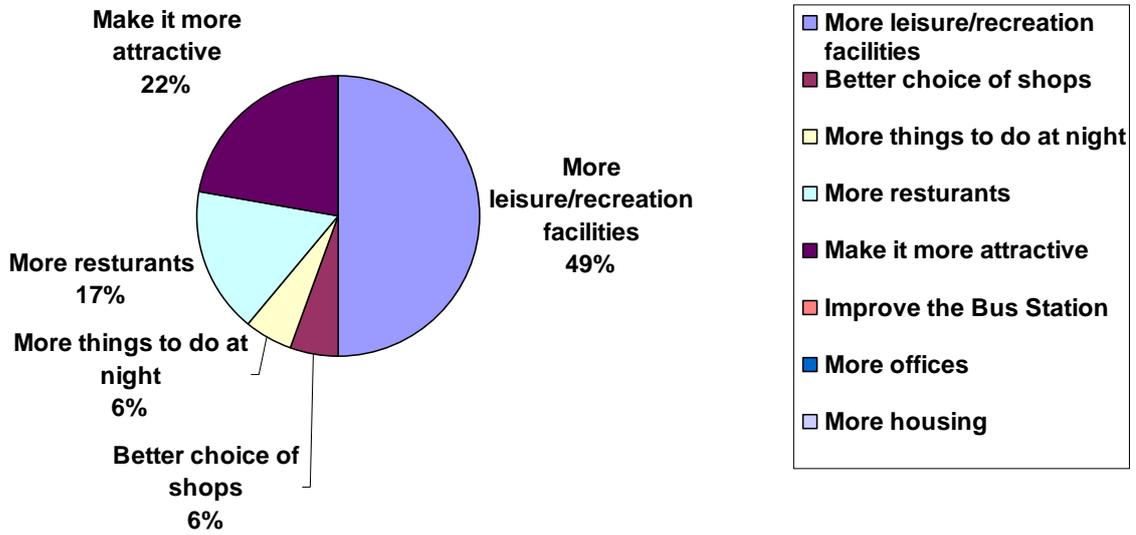
Nine locations roughly corresponding to the neighbourhood areas were presented the Youth Councillors who were then asked to vote for which they felt most required better quality green spaces. 16 youth Councillors responded to this question. ‘Latton Bush/Brays Grove/Tye Green received the most votes (7), followed by Church Langley/Newhall/Potter Street (4) and then the Town Centre (3). Three areas – Old Harlow, Passmores/Great Parndon and Katherines/Summers did not receive any votes.

Question 8 – What improvements do you want to see in the Town Centre?

Eight potential improvements that could be made to the Town Centre were presented to the Youth Councillors who were then asked to vote for which one they thought should be undertaken. 18 Youth Councillors responded to this question and the results are presented on the following page.

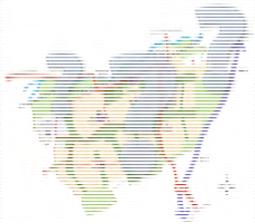
Half (9) of the Youth Councillors stated that they felt more leisure/recreation facilities were needed to improve the Town Centre. Other improvements receiving support were measures to make the Town Centre more attractive (4 votes) and provision of more restaurants (3 votes). The two other Youth Councillors voted for there to be more things to do at night and for a better variety of shops (1 vote each). None of the Youth Councillors wanted to see more housing of offices within the Town centre, and none saw the Bus Station as being a major problem.

**Question 8: What improvements do you want to see in the
Town Centre?
(18 responses)**



Appendix 6.2 Harlow Youth Council Presentation Slides

Harlow's Local Development Framework
Harlow Youth Council Workshop
17 January 2011




What are we doing and why are we here?

- We are preparing a new plan that will regenerate Harlow by:
 - Providing more homes, employment, shopping, education, transport improvements, health, leisure, and green spaces
 - Protecting important environmental areas (2 Sites of Special Scientific Interest and 2 Local Nature Reserves)
 - We want as many people and groups involved as possible and can have their say on Harlow's future
 - This includes the young people in the town, including **YOU!**



How long until the plan is ready?

Core Strategy Stages




Issues and Options Consultation



- Consultation from **22 November to 28 January 2011**
- The consultation was launched at an event at Harlow Train Station on 23 November
- Exhibitions at the Harvey Centre, community centres and churches across Harlow
- A presentation to Harlow's Youth Council tonight!
- A video on the consultation can be viewed on-line at www.youtube.com/harlowcouncil
- Document and questionnaire can be viewed on-line at www.harlow.gov.uk/issuesandoptions

Shaping Now - Shaping the Future



Harlow, the story so far...



The 1952 Masterplan for Harlow



The current Adopted Local Plan (2001 - 2012)

- A New Town designed by Sir Frederick Gibberd
Housing and employment areas separated by 'Green Wedges'
- Harlow has many strengths:
- Near to London, Cambridge and Stansted Airport
 - Home to big companies (GSK, Pitney Bowes, Raytheon)
 - Sculpture Town
 - Excellent leisure and cultural facilities
- But it also has many issues:
- Deprived areas, poor quality housing, congestion



So what's been happening?



- Workshops with local people and organisations (including previous Youth Councillors) to identify development issues affecting the town
- **Some of the issues already highlighted....**



What are the key issues?

Green spaces (including Green Wedges) should be maintained and protected...



High quality architecture and design should be promoted...



What are the key issues?

A better range of housing to meet the needs of the whole community...



What are the key issues?

The Town Centre needs to be improved...with a better choice of shops to encourage more shoppers to come in to Harlow...



Education, training and skills need to be improved in the town



What are the key issues?

Traffic congestion needs to be addressed in certain locations...



Cycle paths and foot paths need to be improved...



What are the key issues?

Recreational facilities should be protected and enhanced...



Quality green spaces for health and leisure use should be protected and maintained...



Questions

Q1: Do you like living in Harlow?

Q2: Would you like to live in Harlow when you are older?

Q3: Please vote on what you think is the biggest problem in Harlow?

- Housing
- Traffic congestion
- Not enough green/open spaces
- Lack of jobs
- Poor range of shops
- Lack of leisure and cultural facilities
- Town Centre



Q4: If new homes are needed, please vote on where you think they should be built?

- Around public transport hubs (Train/Bus Stations, Bus Stops)
- Within neighbourhood areas
- Hatches
- Neighbourhood centres
- Town Centre
- Green Wedges
- On undeveloped / underused open land
- Outside Harlow



Q5: How do you think Harlow's congestion problems should be solved?

- Encourage more people to use public transport for work and leisure
- Improve cycleways and bus lanes to the Town Centre
- Improve connections to the motorway
- Improve walking and cycle routes in the town
- Better parking provision across the town
- Better traffic lights to control traffic better
- Improve public transport
- Improve the railway service
- Other



Q6: What sort of jobs should be available in Harlow?

- Office
- Manufacturing
- Shopping/Retail
- Science/Research & Development
- Warehouse/Distribution

Q7: Which areas of the town require better quality green spaces?

- Town Centre
- Netteswell/Mark Hall/The Stow
- Church Langley / Newhall /Potter Street
- Old Harlow
- Latton Bush/Brays Grove / Tye Green
- Passmores/Great Parndon
- Stewards/Kingsmoor
- Little Parndon/Hare Street
- Katherines/Sumners

Q8: What improvements do you want to see in the Town Centre?

- Better choice of shops
- More things to do at night
- More restaurants
- More leisure / recreation facilities
- Make it more attractive
- Improve the Bus Station
- More offices
- More housing

Appendix 7 - Examples of consultation publicity materials

Appendix 7.1 Generic Consultation Letter

(This letter was sent out on 22 November 2010)

Dear Sir or Madam,

HARLOW CORE STRATEGY ISSUES AND OPTIONS CONSULTATION

I am writing to advise you that Harlow Council will be consulting on its Core Strategy Issues and Options document for ten weeks from 22 November 2010 to 28 January 2011.

The Core Strategy will be the main planning document in Harlow's emerging Local Development Framework (LDF). The LDF is a series of documents that will guide planning and development in Harlow to 2026 and beyond.

The Issues and Options consultation is the first stage of Harlow's Core Strategy, setting out the key issues that need addressing in Harlow and proposing possible options for planning the town's future.

Have your say!

This is your chance to have your say at the start of the process.

Your responses and suggested solutions to the questions in the Issues and Options document are important and will help the Council to prepare Harlow's final Core Strategy.

The following documents are now available to view online at www.harlow.gov.uk/issuesandoptions:

- Issues and Options Consultation Document
- Questionnaire
- Sustainability Appraisal incorporating Strategic Environmental Assessment
- Habitats Regulations Assessment Screening Report
- Summary Leaflet

There is also a link on the above webpage to view a LDF consultation video explaining the role of the LDF.

Paper copies of the consultation document are available for inspection during normal office hours at the Civic Centre and in local libraries. Copies of the documents on CD-Rom can be obtained by emailing myharlow@harlow.gov.uk or calling 01279 446028.

How to respond

You can comment on the Issues and Options consultation document by:

1. Submitting your responses via the Council's online Consultation Portal at <http://harlow.jdi-consult.net/ldf/>
2. Emailing your completed questionnaire to myharlow@harlow.gov.uk;
3. Hand delivering your completed questionnaire at the Civic Centre; or by
4. Posting your completed questionnaire to: Issues and Options Consultation, Forward Planning Team – Harlow Council, Civic Centre, The Water Gardens, Harlow, CM20 1WG.

Please note:

- By responding you are giving your consent to the Council to hold and process your personal data in accordance with the requirements of the Data Protection Act 1998;
- Your comments will be available for others to view at the Council's offices; and
- The data gathered through this Issues and Options consultation will be held for the duration of this LDF up to and probably beyond 2026.

Exhibition Drop-ins

You are welcome to attend, or send a representative to, one of the community exhibitions listed below to find out about the Issues and Options consultation process, the LDF, and possible options for planning the town's future.

- Harlow Town Train Station – Tuesday 23 November 2010, 7am – 10am, and 4.30pm – 7pm
- The Latton Bush Centre – Wednesday 24 November 2010, 6pm – 9pm
- Summers Leisure Centre – Tuesday 30 November 2010, 6pm – 9pm
- Great Parndon Community Centre – Wednesday 1 December 2010, 6pm - 9pm
- Potter Street Community Centre – Tuesday 7 December 2010, 6pm – 9pm
- Church Langley Community Centre – Thursday 9 December 2010, 5.30pm – 7.30pm
- Trinity United Reformed Church (Hare Street) – Wednesday 15 December 2010, 6pm – 9pm
- Moot House (The Stow) – Tuesday 4 January 2011, 7pm – 9pm
- St John's Arc (Old Harlow) – Tuesday 11 January 2011, 6pm – 9pm
- The Harvey Centre, Harlow – Wednesday 12 January 2011, 9am – 5pm

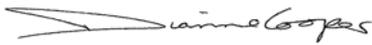
Deadline

The deadline for responding to the Issues and Options consultation is **5pm on Friday 28 January 2011**.

Following the consultation the representations will be analysed by the Council and a Consultation Summary Report will be published on the Council's website. The Issues and Options consultation will inform Harlow's Core Strategy. There will be another consultation on a Core Strategy Preferred Options document before the final Core Strategy document is submitted to the Government and a public examination held before it is adopted.

If you have any questions about the Issues and Options Consultation please contact a member of the Forward Planning Team on 01279 446028.

Yours faithfully,



Dianne Cooper
Planning & Building Control Manager

Appendix 7.2 Bespoke Consultation Letter

(This letter was sent to ethnic minority groups on 7 December 2010)

Dear Sir/Madam,

INVOLVING HARLOW'S ETHNIC MINORITY GROUPS IN PLANNING FOR HARLOW'S FUTURE

Harlow Council is asking the people of Harlow their views on a new plan for the town's future called the Local Development Framework (LDF). A major element of the LDF will be a document called The Core Strategy which will guide development in Harlow to 2026 and beyond. It will set out how much housing is needed and where it should be located. It will also address future employment needs and consider transport and social/community infrastructure provision including the needs of Harlow's ethnic minority groups.

The Core Strategy "Issues and Options" document has been published by the Council for a ten week public consultation. This is just is the first stage of Harlow's Core Strategy and sets out the main development issues affecting the town as well as possible options for planning the town's future.

Harlow's faith groups should have their say!

Harlow Council is keen to engage with the town's ethnic minority groups including umbrella groups to understand their needs and to encourage them to get involved in the preparation of Harlow's LDF.

Enclosed is a CD Rom which includes copies of the following documents:

- Consultation Document
- Summary Leaflet
- Questionnaire
- Equalities Monitoring Form (optional)
- Core Strategy Issues and Options Sustainability Appraisal
- Core Strategy Issues and Options Sustainability Appraisal – Non-Technical Summary
- Habitat Regulations Assessment
- Habitat Regulations Assessment – Non-Technical Summary

These documents and details about the community exhibitions that are taking place are available to view on the Council's website at www.harlow.gov.uk/issuesandoptions.

Also available to view on the website is our LDF DVD explaining the role of the LDF, and Frequently Asked Questions about the Core Strategy and consultation being carried out.

We would be grateful if you could share this information with your group and encourage them to fill out a questionnaire or to go online to find out more information about the consultation.

How to respond

There are four ways that comments can be made to ensure their voices are heard:

1. Submit responses via the Council's online Consultation Portal at <http://harlow.jdi-consult.net/ldf/>
2. Email completed questionnaires to myharlow@harlow.gov.uk;
3. Hand deliver completed questionnaires at the Civic Centre; or by
4. Posting completed questionnaire to: Issues and Options Consultation, Forward Planning Team – Harlow Council, Civic Centre, The Water Gardens, Harlow, CM20 1WG.

Please note:

- By responding your members are giving their consent to the Council to hold and process their personal data in accordance with the requirements of the Data Protection Act 1998;
- Your members' comments will be available for others to view at the Council's offices; and
- The data gathered through this Issues and Options consultation will be held for the duration of this LDF up to and probably beyond 2026.

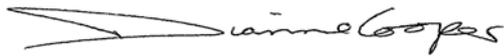
Deadline

The consultation will run until 28 January 2011.

Following the consultation the representations will be analysed by the Council and a Consultation Summary Report will be published on the Council's website. There will be further consultation on the Council's Preferred Options for the Core Strategy, before the final Core Strategy document is submitted to the Government and a public examination held before the document is adopted to guide Harlow's future development.

If you have any questions about the Issues and Options Consultation please contact Chris Gatland, our dedicated Forward Planning Consultation Officer on 01279 446028.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Dianne Cooper', with a stylized flourish at the end.

Dianne Cooper
Planning & Building Control Manager

Appendix 7.3 Community Exhibitions

This table sets out the venues, dates and times of the 10 'Issues and Options' community exhibitions that took place across the town during the consultation period (22 November 2010 - 28 January 2011).

Venue	Date	Time(s)
Harlow Town Train Station	Tuesday 23 November 2010	7am - 10am & 4.30pm - 7pm
The Latton Bush Centre	Wednesday 24 November 2010	6pm - 9pm
Sumners Leisure Centre	Tuesday 30 November 2010	6pm - 9pm
Great Parndon Community Centre	Wednesday 1 December 2010	6pm - 9pm
Potter Street Community Centre	Tuesday 7 December 2010	6pm - 9pm
Church Langley Community Centre	Thursday 9 December 2010	5.30pm - 7.30pm
Trinity United Reformed Church	Wednesday 15 December 2010	6pm - 9pm
Harlow Town Library (Static Un-staffed Exhibition)	Monday 20 December - Friday 31 December 2010	Normal library opening hours
Moot House (The Stow)	Tuesday 4 January 2011	7pm - 9pm
St. John's Arc, Old Harlow	Tuesday 11 January 2011	6pm - 9pm
The Harvey Centre, Harlow	Wednesday 12 January 2011	9am - 5pm

In addition to the venues listed above, a permanent unstaffed exhibition will be located in the Civic Centre reception throughout the consultation period.

Appendix 7.4 Press Release

(This press release was sent out to local and regional media on 15 November 2010)

News from Harlow Council: Public to be asked how they would plan Harlow's future

A ten-week public consultation exercise on Harlow's future development begins next Monday (22 November 2010).

Harlow Council is asking residents, businesses and local groups where new homes, employment areas, shops, schools, community and leisure facilities, green spaces and transport improvements in Harlow should be located in the future.

The consultation is on the first stage of Harlow's Core Strategy called "Issues and Options". The Core Strategy is the main planning document in the town's emerging Local Development Framework (LDF).

The LDF, which will replace the Local Plan, is a series of documents that will guide planning and development in Harlow up to 2026 and beyond.

A series of community exhibitions are taking place across the town from next week where people can find out about the issues and options, the LDF and possible options for planning the town's future.

Local people and organisations have already suggested what they think are the main development issues affecting the town. These are included in the consultation document, which sets out the vision, themes and objectives that are being used to develop the Core Strategy.

The document also sets out the main principles for guiding future development. It includes a consultant's assessment of five potential growth options around Harlow based on the East of England Plan. Although the East of England Plan is being withdrawn, the consultant's suggested growth options are proposed as a starting point for exploring potential options to meet Harlow's current and future regeneration and housing needs.

Full details about the consultation and how to respond will be available on the Council's website from 22 November 2010 at www.harlow.gov.uk/issuesandoptions. The consultation will run until Friday 28 January 2011.

Councillor Tony Hall, Harlow Council Executive Committee Member and Chairman of the Council's Environment Policy Working Group, said: "We want the future development of Harlow to be a 'hot topic' in the town so residents, businesses and local groups take part in this consultation. We are at an important stage in developing proposals and we want people's views on where different land uses should be located in [the future](#)."

In August 2010 the Council reconfirmed its commitment to the principle of supporting high quality growth to deliver regeneration. This continues to have cross-party support on the Council.

Harlow Council's three Group Leaders, Councillor Andrew Johnson (Leader of the Council), Councillor Mark Wilkinson (Labour Group Leader) and Councillor Chris Millington (Liberal Democrat Group Leader), said: "We are committed to the regeneration of Harlow, securing infrastructure improvements and providing much needed housing for local people. We believe growth is the way to achieve this.

"There is a housing shortage in Harlow and we know that the town's green spaces are highly valued by residents. We urge residents to let us know where they think the new homes should be built."

Ends

Notes to editors

Following the consultation all views will be analysed and a Consultation Summary Report will be published on the Council's website.

There will be further public consultation on a Core Strategy Preferred Options document. This will be before the final Strategy document is submitted to the Government and a public examination held.

List of community exhibitions:

- Harlow Town Train Station – Tuesday 23 November 2010, 7am – 10am, and 4.30pm – 7pm
- The Latton Bush Centre – Wednesday 24 November 2010, 6pm – 9pm
- Summers Leisure Centre – Tuesday 30 November 2010, 6pm – 9pm
- Great Parndon Community Centre – Wednesday 1 December 2010, 6pm - 9pm
- Potter Street Community Centre – Tuesday 7 December 2010, 6pm – 9pm
- Church Langley Community Centre – Thursday 9 December 2010, 5.30pm – 7.30pm
- Trinity United Reformed Church (Hare Street) – Wednesday 15 December 2010, 6pm – 9pm
- Moot House (The Stow) – Tuesday 4 January 2011, 7pm – 9pm
- St John's Arc (Old Harlow) – Tuesday 11 January 2011, 6pm – 9pm
- The Harvey Centre, Harlow – Wednesday 12 January 2011, 9am – 5pm

A permanent unstaffed exhibition will be located in the Civic Centre Reception throughout the consultation period. An additional unstaffed exhibition display will also be located in Harlow Town Centre Library during the Christmas holidays.

Niel Churchill MCIPR
Communications Officer
Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG

Tel: 01279 446710
Mobile: 07872416206
Fax: 01279 446637

Alternative Contact: Andre Ferreira 01279 446185

www.harlow.gov.uk

How would YOU plan Harlow's future?

Have your say!

Harlow Council is preparing a new plan, the Core Strategy, which will shape how Harlow is developed over the next 15 years.

The Council is now consulting on the first stage of Harlow's Core Strategy and we want to hear your views on the key issues affecting Harlow and options for planning the town's future.

To find out more visit the exhibition in the Civic Centre reception or come to one of the exhibitions below.



Housing



Placeshaping



Lifestyles



Infrastructure



Prosperity

Harlow Town Railway Station Tuesday, 23 November 2010 7am - 10am and 4.30pm - 7pm	The Latton Bush Centre Wednesday, 24 November 2010 6pm - 9pm	Summers Leisure Centre Tuesday, 30 November 2010 6pm - 9pm
Great Parndon Community Centre Wednesday, 1 December 2010 6pm - 9pm	Potter Street Community Centre Tuesday, 7 December 2010 6pm - 9pm	Church Langley Community Centre Thursday, 9 December 2010 5.30pm - 7.30pm
Trinity United Reformed Church Wednesday, 15 December 2010 6pm - 9pm	Harlow Town Library Monday 20 December - Friday 31 December 2010 Static exhibition display during normal library opening times	
Moot House, The Stow Tuesday, 4 January 2011 7pm - 9pm	St. John's Arc, Old Harlow Tuesday, 11 January 2011 6pm - 9pm	The Harvey Centre, Harlow Wednesday, 12 January 2011 9am - 5pm

Consultation ends 5pm on 28 January 2011



www.harlow.gov.uk/issuesandoptions

HARLOW-see something different



Appendix 7.6 Harlow Times Magazine Article

How would you plan Harlow's future?



Where would you put the new homes, employment, shops, schools, community and leisure facilities, green spaces and transport improvements that Harlow needs to grow?

That's the question Harlow Council is asking you as it prepares to plan the town's future. We're asking for your views on the blueprint for Harlow - called the Local Development Framework (LDF) - which will guide development in the town to 2026 and beyond.

Harlow needs to expand to meet demands for housing and factor in the leisure and other facilities that go with that. There are five options outlined where that growth could take place - and we want to hear your views before moving forward.



The LDF will set out where new homes, employment, shops, schools, community and leisure facilities, green spaces and transport improvements will be located. These plans will be on show across Harlow for the next ten weeks, and it's critically important your voice is heard.

Local people and organisations have already suggested what they think are the main development issues affecting the town. These are included in the consultation document.

The consultation - which you can see online - sets out the vision, themes and objectives that are being used to develop the Core Strategy.

At its heart is the discussion over how we meet Harlow's current and future regeneration and housing needs.

We want Harlow to be a place where people want to live and raise families - and employers want to base their companies - so the right mix and location of housing is vitally important. The public consultation runs until 5pm on 28 January 2011. So please visit a road show, have a look at the document and tell us what you think.

How can you view the consultation document?

The issues and options consultation document is available to view online at www.harlow.gov.uk/issuesandoptions

Paper copies of the document are also available for inspection during normal office hours at the Civic Centre and in local libraries.

There is also a summary leaflet available on-line at www.harlow.gov.uk/issuesandoptions or at the Civic Centre and in local libraries.

Copies of the documents on CD-Rom can be obtained by emailing: myharlow@harlow.gov.uk or calling (01279) 446028.

Four ways to have your say

You can comment by:

1. Submitting your responses at <http://harlow.jdi-consult.net/ldf/>
2. Emailing your completed questionnaire to myharlow@harlow.gov.uk
3. Dropping your questionnaire into the Civic Centre; or by
4. Posting your completed questionnaire to: Issues and Options Consultation, Forward Planning Team - Harlow Council, Civic Centre, The Water Gardens, Harlow, CM20 1WG.

The deadline for responding to the consultation is 5pm on Friday 28 January 2011.

Community Exhibitions

A number of exhibitions are taking place across the town where you can find out more about the LDF process and look at the options being put forward.

- Potter Street Community Centre
Tuesday 7 December 2010, 6pm-9pm
 - Church Langley Community Centre
Thursday 9 December 2010, 5.30pm-7.30pm
 - Trinity United Reformed Church (Hare Street)
Wednesday 15 December 2010, 6pm-9pm
 - Moot House (The Stow)
Tuesday 4 January 2011, 7pm-9pm
 - St John's Arc (Old Harlow)
Tuesday 11 January 2011, 6pm-9pm
 - The Harvey Centre, Harlow
Wednesday 12 January 2011, 9am-5pm
- A permanent unstaffed exhibition will be located in the Civic Centre Reception throughout the consultation period.

An additional unstaffed exhibition display will also be located in Harlow Town Centre Library during the Christmas holidays.

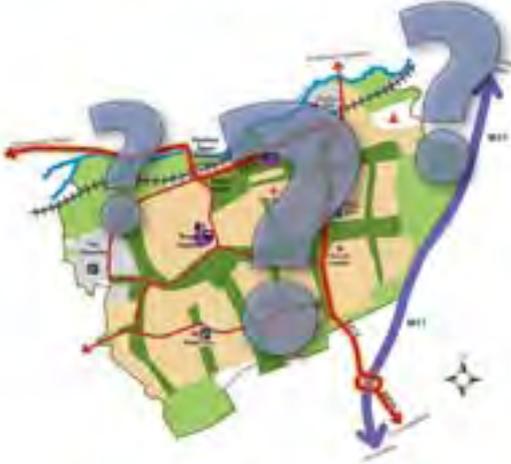
Stay right up to date

You can sign up to receive Harlow Council's free electronic newsletter to keep up to date with Harlow's future plans by completing the LDF Database Form at: www.harlow.gov.uk/ldf

Appendix 7.7 Window Poster in Civic Centre Reception Area

**How would YOU
plan Harlow's future?**

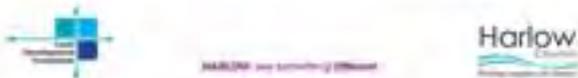
Harlow's Local Development Framework
Have your say!



**Core Strategy
Issues and Options Consultation**

**22 November 2010
to 28 January 2011**

View the consultation document, pick up
a questionnaire and see the exhibition
in the reception area, or visit
www.harlow.gov.uk/issuesandoptions



Appendix 7.8 Exhibition Display Panels

543

How would YOU plan Harlow's future?

Harlow's Local Development Framework

What is the Core Strategy?
The Council is preparing a new plan for Harlow called the Local Development Framework (LDF). It is made up of a series of documents, the most important being the Core Strategy. The Core Strategy will set out the strategic policies that will guide development in Harlow up to 2026 and beyond.

Core Strategy Stages

The Core Strategy will set out the location of:

- New housing
- Employment areas
- Shops
- Schools
- Community and leisure facilities
- Open spaces
- Transport improvements

Get Involved!
The Local Plan of England has been withdrawn which means that we can no longer have a Local Plan. However, we have been working on the Local Development Framework (LDF) for some time. It is now at the final stage of consultation. The consultation will end on Friday 28 January 2011.

Harlow, the story so far...

The Gibbard Masterplan
Vision is a plan designed by Sir Frederick Gibbard. The Masterplan separated housing and employment areas by green wedges. Schools and leisure facilities are located in the green wedges which bring the countryside to residents. The housing areas were designed with housing centres, schools, health and community centres.

Sir Frederick Gibbard described the town as:
"an organism which would go on changing and being rebuilt as the needs of people altered."

Harlow Today
The Masterplan and the Local Plan have helped to shape Harlow's distinctive character.

Harlow Today
The Masterplan and the Local Plan have helped to shape Harlow's distinctive character.

Harlow is unique:
 - It is the only town in Essex with a railway station in the town.
 - It is the only town in Essex with a shopping centre in the town.
 - It is the only town in Essex with a school in the town.
 - It is the only town in Essex with a health centre in the town.

The Vision for Harlow

The Core Strategy Vision will be based on the vision and priorities in Harlow's Community Strategy, the Harlow 2020 Vision.

The 2020 Vision for Harlow
"It is an ambition to see Harlow as a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development."

The Core Strategy vision will also reflect the specific regeneration issues affecting the town. These are set out in the Council's adopted Harlow Regeneration and Social Inclusion Strategy (2010 - 2015) and the Council's Core Strategy (2011 - 2026).

Linking the Community Strategy with the Core Strategy
The Council's Community Strategy and the Core Strategy are linked together. The Community Strategy sets out the Council's long-term vision for Harlow, while the Core Strategy sets out the Council's policies for land use and development. The two strategies are linked together by a series of strategic objectives.

The Core Strategy - Themes and Objectives

There are five "Core Themes" and 26 "Strategic Objectives" which are being used to develop the Core Strategy.

Place-making
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Infrastructure
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Employment
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Community
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Environment
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Strategic Objectives
The Strategic Objectives help to deliver the vision for Harlow by addressing the issues identified within the five core themes. The Core Strategy aims to support the development of policies and programmes to support the delivery of the Strategic Objectives.

What are the Key Issues?

The common issues identified so far are set out below under each of the five core themes.

Housing
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Employment
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Community
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Environment
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Infrastructure
The Core Strategy aims to ensure that Harlow is a vibrant, healthy and well-served town, where people can live, work and play, and where the town is a model of sustainable development.

Guiding future development

To meet Harlow's current and future needs, the town needs to regenerate. To do this requires new housing and economic growth, alongside improved infrastructure and services.

How much new development is required?
The plan must meet the community's future development needs and address the identified issues.

What principles should guide growth?
New development should support regeneration and be sustainable, and deliver the strategic objectives set out in the Core Strategy.

Assessing the opportunities for development in different areas
Assessing the development potential, if any, in an area or an area of land.

Assessing the benefits and impacts of Harlow's Growth Wedges
But if the community's needs cannot be met through these options then the Green Belt and urban areas will need to be considered.

The ability of existing employment sites to meet current and future employment needs
The ability of existing employment sites to meet current and future employment needs.

The ability of existing employment sites to meet current and future employment needs
The ability of existing employment sites to meet current and future employment needs.

Online @ <http://harlow.jdi-consult.net/ldf/>

Consultant's suggested growth options

A total of 1,000 new homes will be provided in the East of England Plan to ensure the regeneration of the town. An independent appraisal has considered to ensure growth options providing 1,000 in the built up area of the town and 11,500 in other locations.

The full report is at www.harlow.gov.uk (following the link to LDF Evidence Base)

The consultant tested the growth options:

Option A Regional Spatial Strategy: Northern Led
This approach is based on the withdrawal of the East of England Plan which allows the bulk of growth to the north of Harlow, with some growth to the east and smaller growth to the south and west.

Option B Policy led 2
This option reflects the broad direction and distribution of growth proposed in the withdrawal East of England Plan, but does not focus on the bulk of the new housing growth to the north of Harlow.

Option C Combined criteria led
This approach is based on an assessment of Green Belt, heritage and other local issues, regeneration identified and transport accessibility, but ignores the specific strategic objectives for growth that need to be met in the withdrawal East of England Plan.

Option D Regeneration led
An alternative approach examined the identification of areas of search and distribution of new housing based upon identifying the greatest potential regeneration benefits for localities within Harlow.

Consultant's suggested approach

The consultant suggested that this option is not a reasonable option primarily in light of transport and heritage constraints associated with high levels of development allocated to the northern half of Harlow.

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The consultant suggested that this option is not a reasonable option primarily in light of transport and heritage constraints associated with high levels of development allocated to the northern half of Harlow.

Have your say!

The Issues and Options consultation ends at 5pm on Friday 28 January 2011

Where can I view the consultation document?

- At www.harlow.gov.uk
- At the Civic Centre reception
- In local libraries

How to request:
 - Order using the Council's consultation portal at www.harlow.gov.uk

Send your completed questionnaire to: ldf@harlow.gov.uk

Send deliver your completed questionnaire in person at the Civic Centre

Post your completed questionnaire to:
 Issues and Options Consultation
 Forward Planning Team, Andrew Clarke
 Civic Centre
 The Water Gardens
 Harlow, CM20 1BB

What happens next?
 The results of the consultation will inform the next stage of Harlow's Core Strategy which is called the "Preferred Options". There will be a further consultation on the Preferred Options and these results will inform the final plan which has to be submitted for government before it can be adopted.

Harlow - you crafting different

Respondents

Name		Organisation/Company	ID	Sub-group
Andrew	Acher		7858	1
Ian	Beckett		7894	1
Colin	Black		6114	1
Alan	Bolden		7924	1
Philip	Bradbury		7857	1
Joel	Charles	Harlow District Council	7922	1
Lindsey	Cox		7892	1
Jonathan	Dance		7907	1
Matthew	Dixon		7699	1
David	Eve		7938	1
Giulia	Festa	Harlow District Council	7918	1
Karen	Garrod		7961	1
Anne	Geiss		7923	1
David	Giess		5825	1
David	Gould		5901	1
Gill	Gould		6124	1
Sandra	Gray		7846	1
Robert	Gray	West Sumners Residents Association	7926	1
Ursula	Grover		7898	1
Peter	Hawkes		7895	1
VICKI	HUNDLEY		7893	1
K	Johnson		7911	1
Moira	Jones		5031	1
Beverly	Le Long		7925	1
Albert	Lidbury		7891	1
Clive	McQuinn		7847	1
Bernard	Mella		5913	1
Colleen	Morrison		5674	1
Barbara	Noble		5680	1
sean	ockenden		7865	1
Robert	Quinn		7919	1
Joy	Robinette	Hunsdon Parish Council	7878	1
Paula	Robinson		5677	1
Mark	Rowe		7845	1
Warren	Scott		7862	1
Sally-Ann	Simpson		7843	1
Andrew	Stuttle		5754	1
Sheila	Sullivan	Morley Grove Residents Association	5043	1
Toni	Swatton		7905	1

Nicholas	Taylor		5738	1
Edward	Vine	vine	7890	1
Julie	Vinton		6007	1
Mary	Wiltshire		6026	1
Janet	Ballard	Roydon Parish Council	5434	2
Andrew	Bramidge	Harlow Council	7848	2
	Chairman	PAH NHS Trust (agent: Lawson)	4683	2
Anna	Cronin	Epping Forest District Council	7940	2
John	Curry	Harlow Civic Society	5318	2
Sue	Dobson	Essex Bridleways Association	7887	2
Paul	Donovan	Hertfordshire County Council (Transport)	4676	2
Rose	Freeman	The Theatre Trust	216	2
Andrea	Gilmour	Hertfordshire County Council (Development Services)	7904	2
Clark	Gordon	Environment Agency	7942	2
John	Greenaway		5284	2
Richard	Hanrahan	Bruce Maintenance Services Ltd	3477	2
Neela	Hibbert	Harlow Ethnic Minority Umbrella	154	2
Martin	Hicks	Hertfordshire County Council (Ecology)	7951	2
John	Horgan	Bush Fair Management Ltd	7913	2
Riaz	Hussain	Medicare Pharmacy	7902	2
	Manager	Fish Brothers	3740	2
	Manager	Harlow College	3833	2
	Manager	Thames Water (agent: Savills)	7944	2
Mark	Norman	Highways Agency	7939	2
Zhanine	Oates	Essex County Council	5406	2
Aarti	O'Leary	West Essex Clinical Commissioning Group & NHS England (agent: Lawson Planning)	5845	2
Mark	Orson	Eastwick & Gilston Parish Council	7610	2
Mark	Owen	Barton Willmore	7950	2
Martin	Paine	East Herts District Council	5682	2
Carol	Richards	Chelmsford Diocese Board of Finance (agent: Strutt & Parker)	7772	2
Consultation	Service	Natural England	7715	2
Roy	Warren	Sport England	7871	2
Bob	Weaver		3345	2
Mark	White	English Heritage	7937	2
David	Wright MBE	Memorial University of Newfoundland - Harlow Campus	6014	2
Elizabeth	Ainsworth		7864	3
Janet	Ballard		7908	3
Anthea	Bickmore		7964	3
Alan	Burgess	Alan Burgess	26	3
Nigel	Clark	STOP Harlow North	25	3

Colin	Gamage		7899	3
Phillip	Gibb		5725	3
Christopher	Long	Harlowsave Credit Union Ltd	7917	3
Madeleine	Paine		7850	3
Nicola	Wilkinson	The Roydon Society	27	3
Michael	Wilson-Roberts		7914	3
Karen	Wilson-Roberts		7915	3
Matt	Wright		7853	3
Tracyann	Wright		7856	3
Mark	Bedding	City and Provincial Properties Ltd (Savills)	5294	4
Anna	Davies	Persimmon Homes	7948	4
	Manager	Barratt Eastern Counties (agent: Bidwells)	7934	4
	Manager	Stort Landowners (agent: Sworders)	7936	4
	Manager	Kier Homes (agent: Savills)	7953	4
	Manager	Harlow West Consortium (agent: Pegasus)	7954	4
	Manager	Quod	7957	4
	Manager	Commerical Estates Group and Hallam Land Management (agent: Boyer Planning)	7960	4
	Manager	ReAssure Ltd (agent: Indigo Planning)	7963	4
Bob	Sellwood	Crest Strategic Projects	7935	4
Olivier	Spencer	Miller Homes (agent: Andrew Martin Planning)	5433	4
James	Stevens	Home Builders Federation	7947	4
Manager		Hubert C Leach (Leach Homes)	7933	4



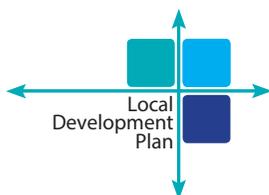
Harlow 2031 – Have your Say

The Council is currently preparing a new Local Development Plan which will cover the period 2011 to 2031. This plan sets out how many new homes and jobs are to be provided in Harlow by 2031. The plan will also include locations where development will take place. In preparation for the Local Development Plan we want your views on options for future development in Harlow which are explained in this leaflet.

Development Needed - The Council is required by Government planning policy set out in the National Planning Policy Framework to boost significantly the supply of housing in order to meet the needs of the community. This means that 'no growth' is not an option for the new Local Development Plan.

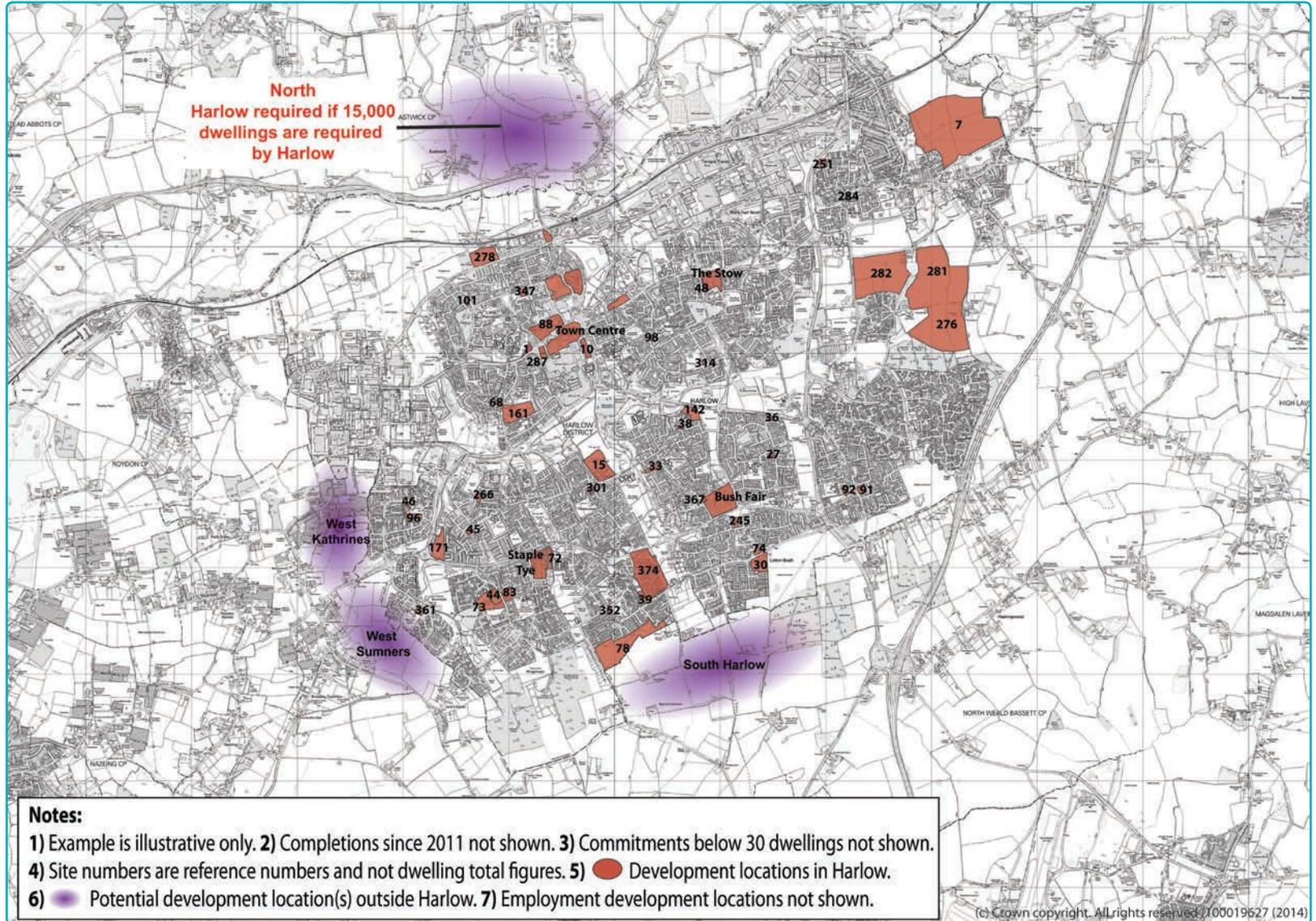
The Council's key priorities are to deliver more and better housing, regeneration and a thriving economy. To achieve these priorities evidence shows that between **12,000 and 15,000 new homes and 8,000 to 12,000 jobs between 2011 and 2031** will be required to meet Harlow's objectively assessed development needs and to deliver the regeneration of the town.

Accommodating Future Development – In Harlow 4,500 homes have planning permission so locations for a further 7,500 to 10,500 dwellings will need to be identified to meet housing need. Five examples of how future development could be provided across Harlow are proposed; each focuses on different Council priorities. These are:



Example 1 – Focused on Priority Regeneration Areas

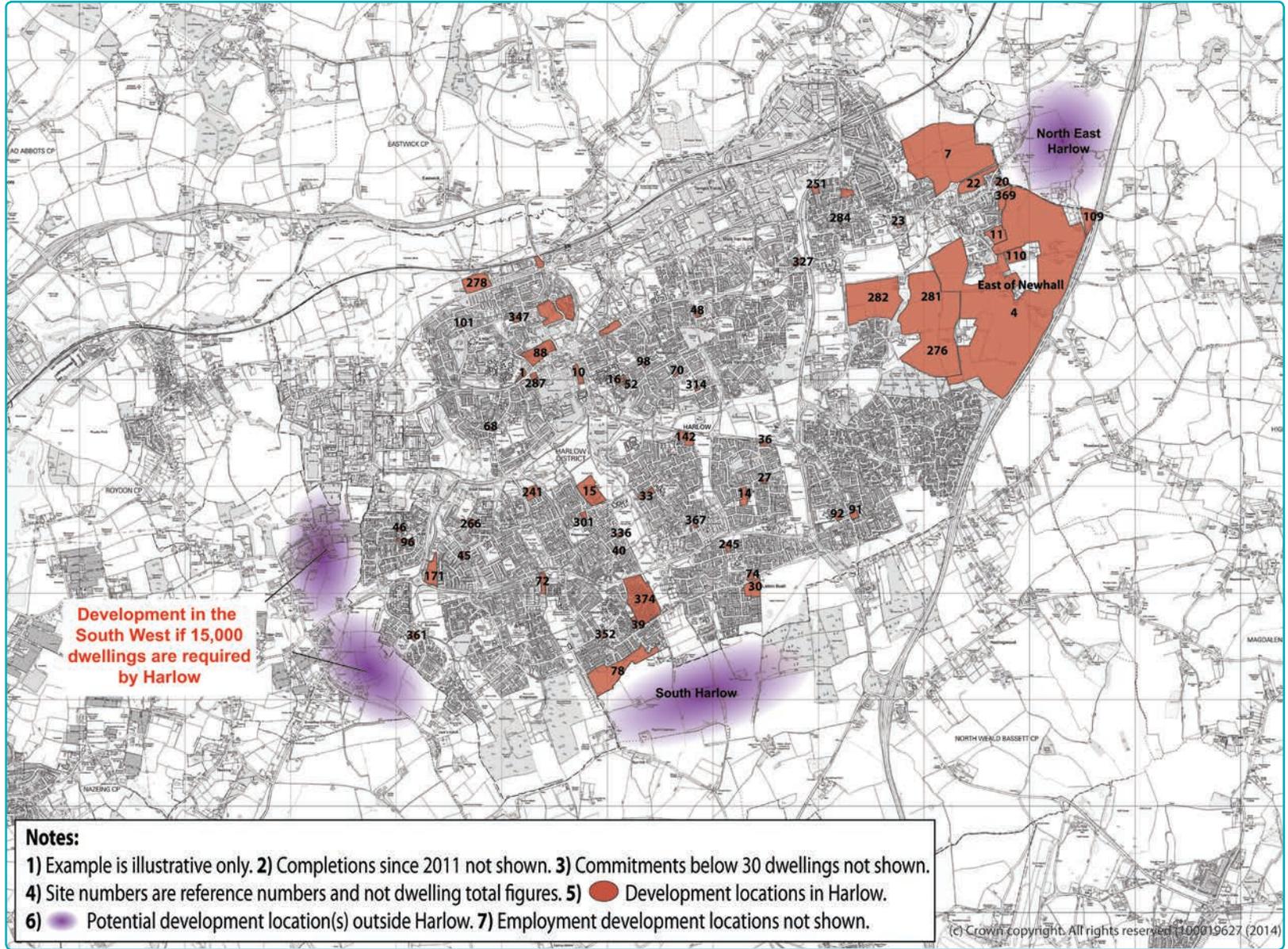
- Focusing development in and around identified priority areas for regeneration.
- Providing additional residential development through the redevelopment of Town Centre and Neighbourhood centres.
- Any development required outside Harlow's boundaries is suggested to be located in areas most likely to help regeneration objectives.
- Development to the north is suggested if 15,000 dwellings are required to support the regeneration of the town.



The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Example 2 - Environmental / Landscape Led

- Focusing development on the less sensitive environmental areas within Harlow.
- Any development required outside Harlow's boundaries to be focused to the north east and south within the ridge line of Harlow which has less landscape and environmental constraints.
- Development to south west is suggested if 15,000 dwellings are required.

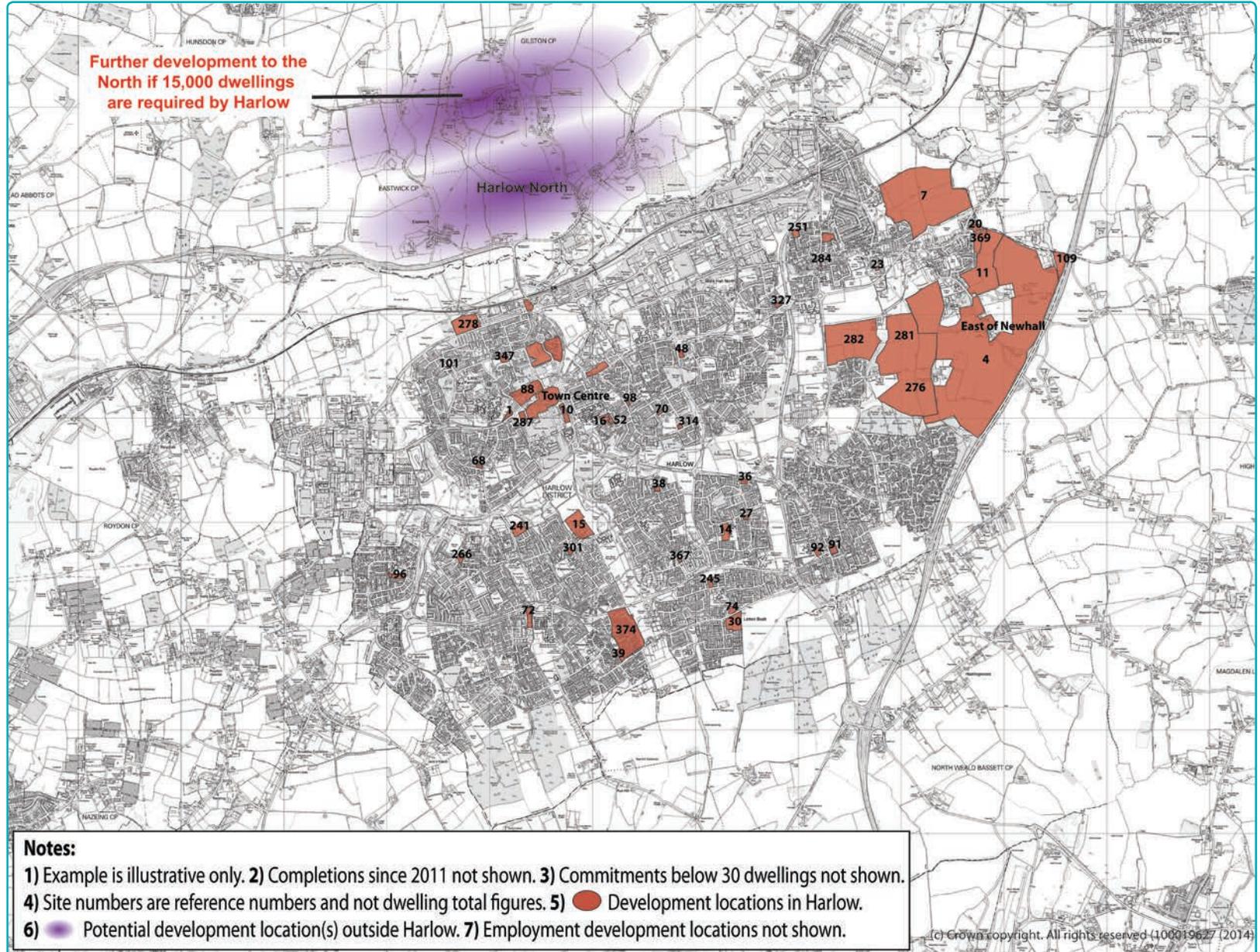


The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Example 3 – Passenger Transport Led

- Focusing future development within Harlow closer to passenger transport hubs such as the train stations and Town Centre bus interchange.
- Development locations in south Harlow are reduced.
- Any development required outside Harlow's boundaries is suggested to be located to north, the closest area to the transport hubs (train stations and town centre bus interchange).
- If 15,000 dwellings are required then further development to the north is suggested.

The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.



Example 4 – Regeneration and Landscape Led

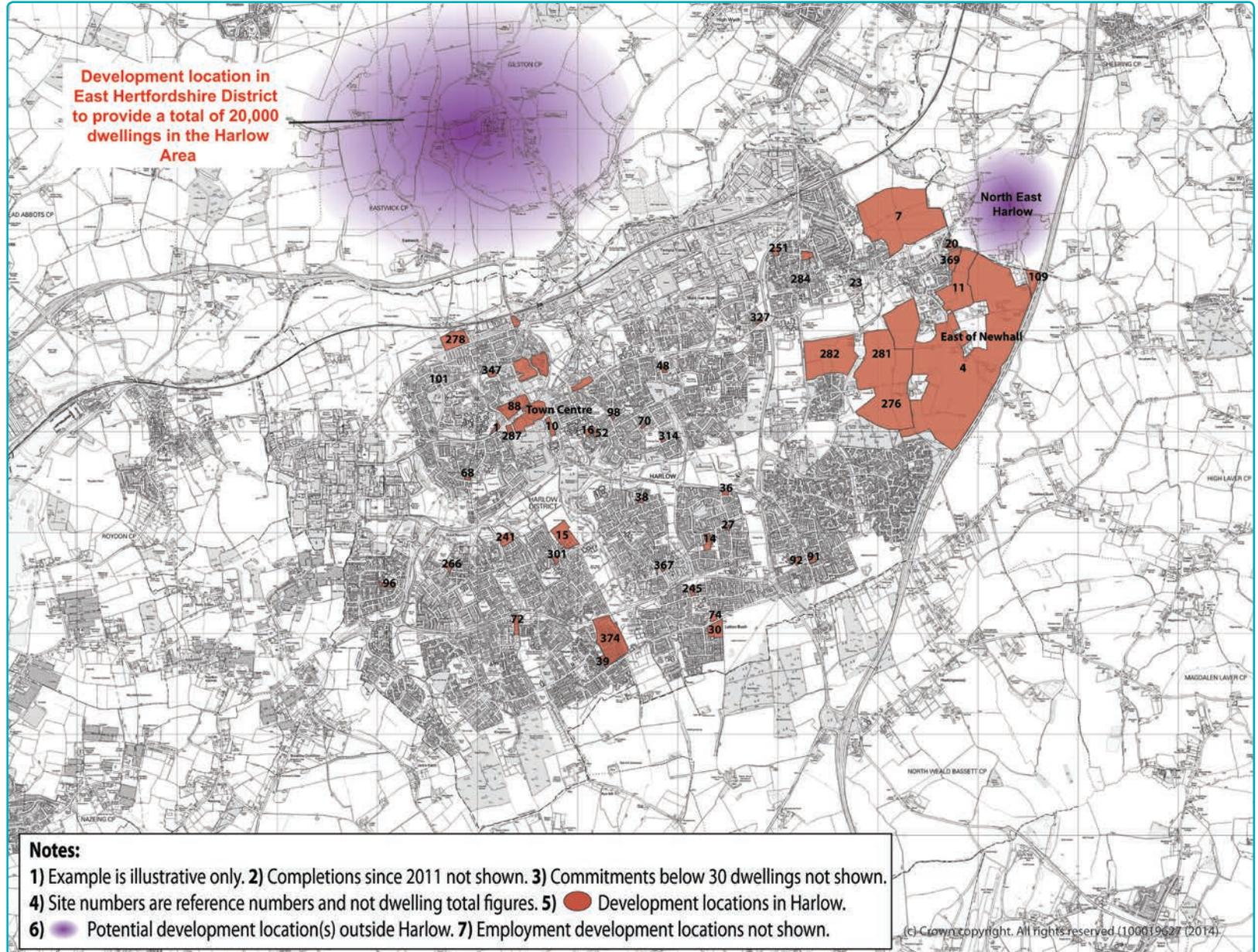
- Future development seeks to balance landscape impacts and achieving regeneration of urban area.
- Providing additional residential development as part of redevelopment of town centre and Neighbourhood centres.
- Development to the north is suggested if 15,000 dwellings are required.



The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Example 5 – Northern Bypass Led

- Provides for 20,000 dwellings across the Harlow Area.
- Focuses future investment in areas more likely to support a new northern bypass to Harlow.
- Development is also provided closer to passenger transport hubs (train stations and town centre bus interchange).
- Less development to be located in the south of Harlow.



The Council wants your views on the preferred level of development and the alternative examples presented. The consultation will run from **Monday 14 April to Friday 30 May 2014**. The full consultation document can be viewed online at **www.harlow.gov.uk/local-plan** or at the following locations:

- The Civic Centre
- Harlow Central Library
- Old Harlow Library

If you have any comments these should be made on the Council's online questionnaire which can be found at **www.harlow.gov.uk/local-plan**. If you wish to discuss this consultation further please contact the Forward Planning Team on **01279 446897** or via email **myharlow@harlow.gov.uk**



Harlow's Local Development Plan consultation

Questionnaire

Harlow Council would like to know your views on the Emerging Strategy and Further Options consultation document. Your feedback will help to prepare the final Harlow Local Development Plan. The Plan is the main planning document which will guide development in Harlow to 2031. For more information about the Plan, please refer to the consultation document.

Please read the consultation document before responding to the questions.

Where can I view the consultation document?

The consultation document can be viewed online at
www.harlow.gov.uk/local-plan

Paper copies of the consultation document are available for inspection during normal office hours at the Civic Centre, in Harlow Central Library and in Old Harlow Library.

If you would like this questionnaire in a different language or format please call Contact Harlow on **01279 446655** or email **myharlow@harlow.gov.uk**

Council Officers will be available to help you with this questionnaire if required.

The deadline for responding to the consultation is 30 May 2014.

COMPLETING THE QUESTIONS

Please answer the questions by putting a tick in the appropriate box or using the space provided to write your comments. If you need extra space for comments, please use additional paper, clearly number your responses, and attach to your questionnaire using a staple.



Please complete the following questions

Question 1 The Council is required by Government policy set out in the National Planning Policy Framework to boost significantly the supply of housing to meet the needs of the community. This means that ‘no growth’ is not an option for the Local Development Plan. Regard has also been given to the Council’s key priorities which are to deliver more and better housing, regeneration and a thriving economy.

With this in mind do you think that the level of development proposed for Harlow between 2011 and 2031 would deliver the Council’s objectives as set out on page 20?

The level of development proposed for Harlow is set out in paragraph 4.26 (page 28) of the consultation document).

Yes No

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 2 Which example(s) do you feel come closest to delivering the Council’s stated vision (page 18) and core priorities (page 20) for the Local Plan? (Please tick all that apply.)

- Example 1 – Focused on Priority Regeneration Areas
- Example 2 – Environmental/Landscape Led
- Example 3 – Passenger Transport Led
- Example 4 – Regeneration and Landscape Led
- Example 5 – Northern Bypass Led
- None of the above

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 3 Please rank, in order of priority (1=most important, 4=least important) how important the following principles are to you in locating future development across Harlow:

Maximising regeneration priorities

Avoiding sensitive environmental/
landscape areas

Facilitating access to
passenger transport facilities

Supporting key infrastructure
improvements, e.g. a northern bypass
to Harlow

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 4 Do you think the locations included in the Focused on Priority Regeneration Areas Example 1 (as set out on page 38) are likely to deliver the Council's regeneration objectives set out in chapter 3?

Yes No

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 5 Do you think the locations included in the Environmental/Landscape Led Example 2 (as set out on page 43) are likely to reduce environmental/landscape impacts?

Yes No

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 6 Do you think the locations included in the Passenger Transport-Led Example 3 (set out on page 48) are likely to deliver passenger transport objectives set out in chapter 3?

Yes No

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 7 Do you think the locations included in the Regeneration and Landscape-Led Example 4 (as set out on page 53) are likely to balance regeneration and landscape objectives?

Yes No

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 8 Do you think the locations included in the Northern Bypass-Led Example 5 (as set out on page 58) are more likely to support a new northern bypass to Harlow?

Yes No

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

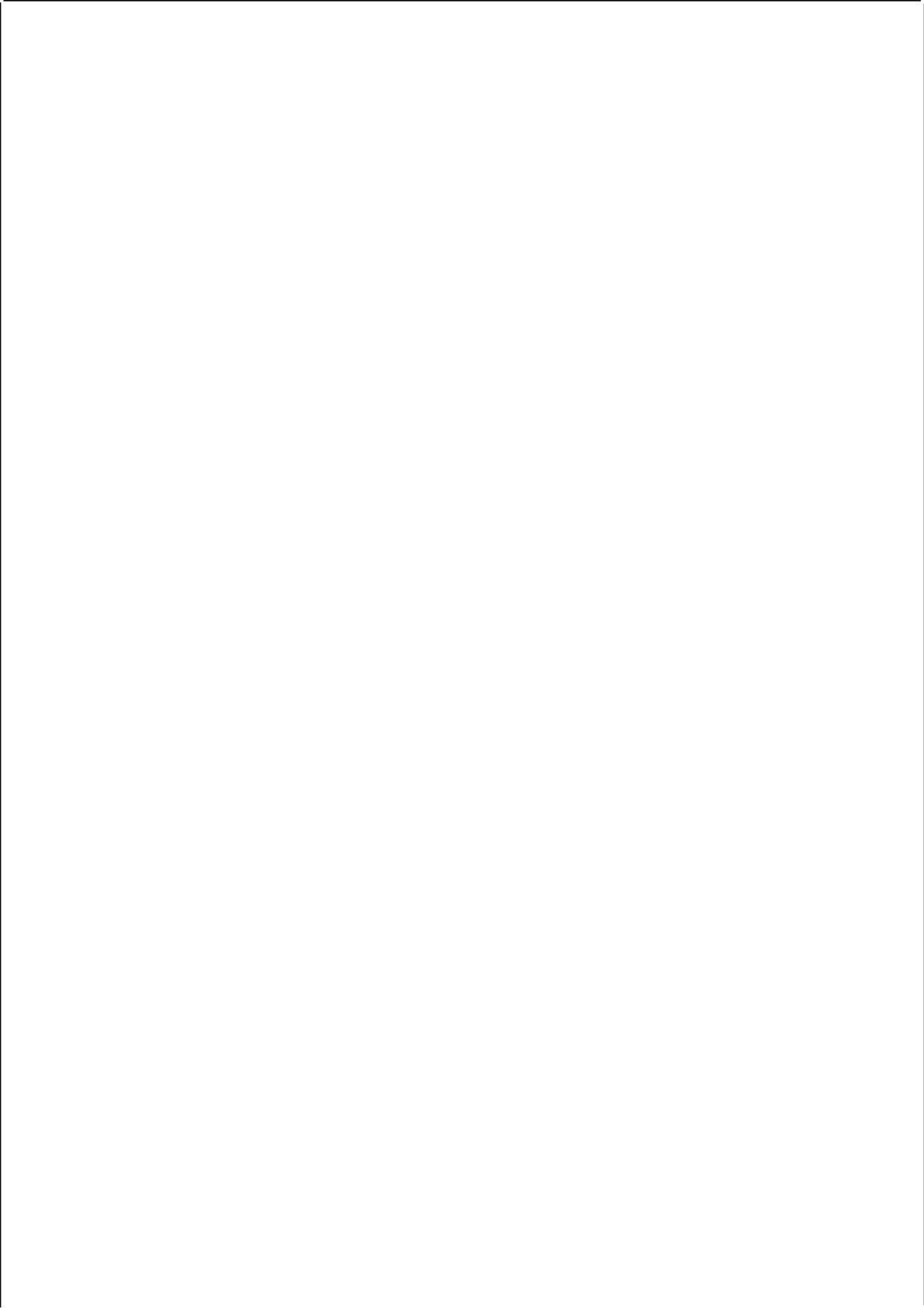
Question 9 Do you think a “blend” of development examples is more appropriate for Harlow?

Yes No

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Comments Box: Please use the space below if you wish to make any other comments on the consultation document. (Please use continuation sheet if necessary.)

A large, empty rectangular box with a thin black border, occupying most of the page. It is intended for the continuation of text or data from the previous page.



Your Contact Details

Please provide your full contact details (if not, your responses may not be considered).

Organisation / Company Name (if appropriate)

Job Title (if appropriate)

Title First Name Surname

Address

.....

Post Code Agent (Yes/No)

Telephone Email (Preferable)

Harlow Council would like to add you to Harlow's Local Development Plan (LDP) Database. The Council can then keep you informed about future consultations on Harlow's emerging LDP and other planning policy documents.

If you do not wish to be added to the Council's LDP Database, please tick the opt-out box.

Privacy Notice

The purpose of the LDP Database is to collect information about interested people and organisations who would like to be informed or consulted on Harlow's LDP and any other planning policy documents prepared by Harlow Council. By providing your contact details on this questionnaire you are happy for your personal data being transferred on to Harlow's LDP Database. It may be used to contact you in future to participate as part of the LDP process. The data may be held for the duration of this LDP up to and probably beyond 2031.

How to return your completed questionnaire:

You can hand deliver your completed questionnaire at the Civic Centre reception or post it to:

Forward Planning
Harlow Council
Civic Centre
The Water Gardens
Harlow CM20 1WG

Please note:

- * By responding you are giving your consent to the Council to hold and process your personal data in accordance with the requirements of the Data Protection Act 1998;
- * Your name, organisation and comments may be available for others to view at the Council's offices and on the council's website; and
- * The data gathered through this consultation will be held for the duration of this LDP up to and probably beyond 2031.

Responses must be returned to the Council by 30 May 2014.

Appendix 9: Harlow Times news article (Spring 2014)

Planning Harlow's Future

Consultation on the next stage of the Local Development Plan, looking at the possible location of future housing in Harlow, is set to start this spring.

The consultation findings will help to prepare the new statutory Local Development Plan for Harlow, guiding future development in the town up until 2031.

The Plan will reflect the future needs of the community and businesses and provide a framework for the consideration and assessment of planning applications.

→ The consultation will be advertised in the local press and on the Council's website: www.harlow.gov.uk/local-plan

Appendix 10: Harlow Star news article (30 January 2014)

email: star@harlowstarnews.co.uk

NEWS FOCUS Harlow Local Plan

Could Harlow become the next Cambridge by 2031?

GEMMA GARDNER
gemma.gardner@harlowstarnews.co.uk

HARLOW Council is hoping to create a town of "aspiration, innovation and prosperity" as they prepare their blueprint for development over the next 20 years.

Last Thursday, the authority's cabinet agreed to hold a public consultation on their proposals.

The work will help prepare an updated statutory Local Plan for Harlow which will guide where future new housing, jobs and services will go in the town up until 2031.

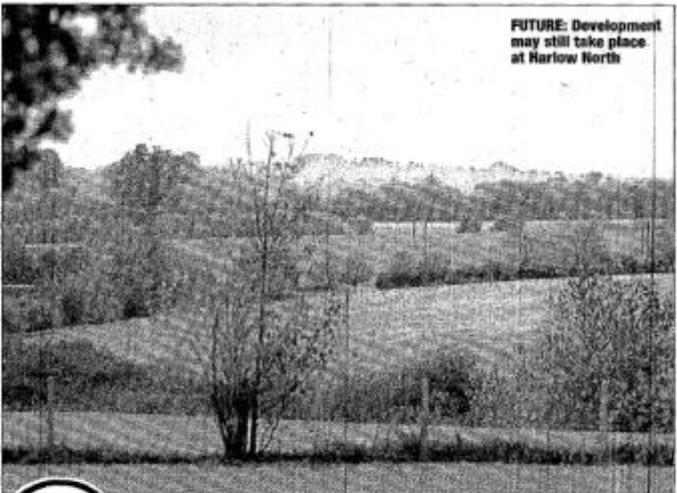
Clr Paul Sztumpf, portfolio holder for regeneration and chairman of the local development plan panel, said: "The local plan will provide a framework for the town to secure more and better housing, regeneration, a thriving economy, a green environment and social inclusion. Securing all of these will not come without significant challenges, particularly when it comes to protecting our environment."

Harlow's Local Plan will need to reflect the future needs of the community and businesses, as well as provide a framework for the consideration and assessment of planning applications.

The consultation will involve asking the public and businesses for views on a series of development scenarios which aim to provide more housing and jobs. The consultation will also include looking at where housing could go in the town and outside the town's borders to meet Harlow's future needs.

Five options are being put forward by Harlow Council. These options provide between 4,000 and 18,000 homes and between 1,200 and 18,000 jobs respectively.

Choosing the later option would provide enough homes to "transform Harlow into the



FUTURE: Development may still take place at Harlow North

WHERE IN HARLOW SHOULD FUTURE DEVELOPMENT TAKE PLACE? HAVE YOUR SAY AT www.harlowstar.co.uk

inquiry in public."

Each option focuses on a different vision for the future from regeneration to improving transport links and infrastructure.

Councillor Phil Waite, portfolio holder for environment, said: "All of the suggested

thing we should do."

Conservative group leader Clr Andrew Johnson said: "I fully support more and better housing through regeneration and growth, but I've some concerns about giving a planned number of options to the public."

present-day Cambridge" according to a report to councillors.

But Cllr Sztrumpf was keen to point out that the proposals could change based on public reaction.

He said: "They are examples - it's all open for debate. This consultation is completely not about giving up our green spaces, it's about strengthening our protection in the case of an

options will be subject to further evaluation taking into account such matters as schools, health services, transport and the results of the consultation."

And Cllr Tony Durcan, portfolio holder for resources and enterprise, said: "If we want to move this town forward we need housing, [and] some needs to be in Harlow. We must look at Harlow first. It's overdue and some-

"It will be very easy for the public to think Harlow Council want to build in those places. I don't think they'll be happy with any of the examples in this report."

Cllr Emma Toal, portfolio holder for youth and citizenship, said: "What do the people of Harlow want this town to be like in 2031? I'm quite excited and looking forward to what the public have to say."

'We'll be at the mercy of developers without plan'

A 'ROBUST' local plan will help to protect Harlow from developers, the town's ruling Labour group say.

Cllr Paul Sztrumpf explained that without a local plan, rejected planning applications could be overturned by the Government's planning Inspectorate.

He said: "The truth is Eric Pickles, the Government's local government minister, has transformed our national planning system into a fragmented, developer led wish list.

"The local plan is local people's best and only means of shaping their own environment. I hope a maximum number of people will participate in this consultation. Without a robust local plan, developers who get planning permission refused locally, will simply appeal to Mr Pickles and win as they did on Gilden Way."



Council leader Mark Wilkinson, pictured, said: "New housing, new jobs and having the right infrastructure is key to Harlow's future. These are important issues for the town and are among the highest priorities for our residents.

"We are committed to developing this plan in an open and transparent manner and I hope the consultation will bring about a healthy debate.

"We need new housing for Harlow people but where should it go?"

Councillor Phil Waite, portfolio holder for environment, said: "If the plan is not robust, supported by objective evidence, and reflects the views of Harlow people, we will be at the mercy of developers and the planning Inspectorate. Decent housing is crucial for the thriving community and has to be our priority."

Land identified as possible sites for housing until 2031

- >> Land west of Sunners
- >> Land east of Katherines
- >> Harlow north
- >> Land south of the town between Harlow and Epping
- >> Land north of Gilden Way and the playing field south of Gilden Way
- >> Former Passmores School
- >> Land east of the Newhall development
- >> Terminus House and car park
- >> Purford Green School
- >> Garage blocks adjacent to Nicholls Tower
- >> Slacksbury Hatch and associated garages
- >> Wissants and adjacent playground
- >> Kingsmoor House and car park

For a full list of sites visit www.harlow.gov.uk.

No new housing 'is not an option'

RESIDENTS and businesses are being urged to have their say on where new homes and jobs should be created in Harlow.

Consultation on Harlow Council's Local Plan, a blueprint for future development in the town, starts on Monday.

Views will be sought on five different examples for how new housing developments could be accommodated within Harlow and possible locations outside the town.

The council say all examples "protect Harlow's existing green spaces as much as they can".

A council spokesman said: "Harlow was never meant to stand still and today Harlow faces a number of issues and development pressures.

"The council needs to plan for the future by providing development to meet local needs and to deliver the regeneration of the town."

The Local Plan will set out how many new homes and jobs are to be provided in Harlow up to the year 2031.

It should reflect the future needs of the community and

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gemma.gardner@hertssexnews.co.uk

businesses, and will provide a framework for the consideration and assessment of planning applications received by the council.

To achieve the council's key priorities of delivering more and better housing, regenerating the town and stimulating the local economy, evidence shows that between 12,000 and 15,000 new homes and between 8,000 and 12,000 jobs will be required up to 2031.

Planning permission has already been granted for 4,500 homes in Harlow, so locations for a further 7,500 to 10,500 homes need to be identified.

Approximately 30 per cent of new homes will be affordable/social housing to help families and individuals that cannot currently afford to buy their own home.

The council is required by Government policy to boost significantly the supply of housing to meet the needs of the community, which means that 'no housing growth' is not an option.

The spokesman added: "If we do not deliver the housing to support regeneration the risk is that Harlow will decline.

"We all know what new housing and new jobs mean to Harlow so we need as many people from the young to the old and all sized businesses to let us know their views on this vital issue.

"We want to start a healthy debate on Harlow's future. We need new housing for Harlow people but where should it go?"

The council has published the Emerging Strategy and Further Options document for consultation and this document can be read and views given at www.harlow.gov.uk/local-plan from today. Further consultations will take place later this year.

The document will also be available in the Civic Centre, Central Library and Old Harlow Library. Exhibitions will also be held throughout the consultation and details of these will on the Council's website.

The consultation closes on May 30.

Appendix 12: Harlow Star news article (8 May 2014)

EMAIL: star@harlow Essex NEWS.CO.UK

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Examples of new housing developments go on display

RESIDENTS will be able to learn more about the five examples of how new housing development could be accommodated within Harlow as plans are due to go on display.

Details will be shown at local development plan exhibitions which are staffed by members of Harlow Council's forward planning team.

The exhibitions will give residents and businesses the opportunity to see the five examples of new housing development, which form part of the proposed Emerging Strategy and Further Options consultation.

The consultation has been running since April and, after the consultation results are in, one - or a combination of examples - will become a part of the emerging Local Development Plan.

Visitors will be able to pick up copies of the consultation leaflet and questionnaire as well as talk to members of the Forward Planning Team about the proposals.

The exhibitions will be held at the Latton Bush Centre, Southern Way on Wednesday, (May 14) from 3-9pm and another at the Harvey Centre on Wednesday, May 21 from 10am-5pm.

There will also be an unstaffed exhibition at the Civic Centre in the Water Gardens and from May 22 a second unstaffed exhibition at Harlow Central Library. Both stands will be available for viewing until May 30 when the consultation comes to an end.

Responses to the consultation can be made via the questionnaire.

For more information on Harlow's Local Development Plan and the consultation - visit www.harlow.gov.uk/local-plan.

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Exhibitions

Exhibitions displaying the five examples for how new housing development could be accommodated within Harlow and paper copies of the questionnaire and leaflet were available at the following locations:

- Exhibitions staffed by Harlow Council Forward Planning Team :
 - St John's ARC, Old Harlow, Tuesday 6 May 2014, 3pm to 9pm
 - Latton Bush Centre, Wednesday 14 May 2014, 3pm to 9pm
 - The Harvey Centre, Wednesday 21 May 2014, 10am to 5pm
- Exhibitions with no staff:
 - Civic Centre Reception, Monday 14 April to Friday 30 May 2014
 - Harlow Central Library, Thursday 22 May to Friday 30 May 2014

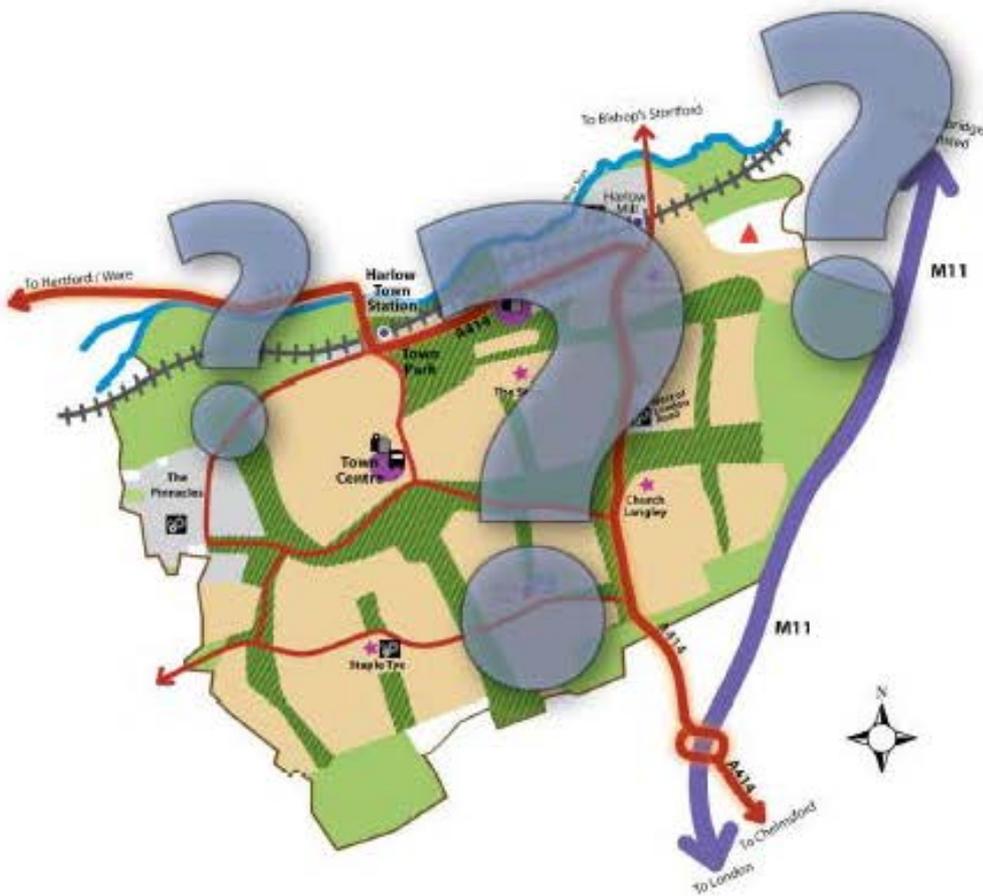


Harlow Local Development Plan

Emerging Strategy and Further Options

Consultation Summary Report

December 2014



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1. Background

- 1.1. Harlow Council is currently preparing a new Harlow Local Development Plan (HLDP). Once adopted, the HLDP will cover the period of 2011 to 2031 and will replace the existing Adopted Replacement Harlow Local Plan (which covered the period of 2006 to 2011).
- 1.2. The HLDP will set out the planning framework for Harlow up to the year 2031. It will include:
 - strategies and policies which will guide the growth and development of the town to meet the needs of residents and businesses
 - detailed policies setting out how proposals for development will be assessed
 - a schedule of infrastructure requirements and a supporting strategy for infrastructure implementation
 - an explanation of how the plan will be monitored and how actions will be implemented if necessary
- 1.3. The HLDP will consist of three main parts:
 - Strategic Policies
 - Development Management Policies
 - Policies Map
- 1.4. There are also a number of supporting documents to the HLDP:
 - Local Development Scheme
 - Evidence Base (comprising a range of technical documents)
 - Annual Monitoring Reports
 - Supplementary Planning Documents
 - Sustainability Appraisals
 - Statement of Community Involvement
 - Area Action Plans (if required)
- 1.5. A number of these documents have been completed and in some cases are regularly revised and updated. The various methods of consultations used during the preparation of the HLDP can be found in the Statement of Community Involvement: Review. This describes how the Council consults with the community in the preparation of Local Planning and other related documents.
- 1.6. The first stage in the preparation of the HLDP was the Issues and Options consultation undertaken at the end of 2010. This set out options for growth in Harlow based on development requirements in the East of England Plan. Since then, the Government has made a number of major changes to the planning system culminating in the abolition of the East of England Plan. This means the Council is now responsible for identifying the level of growth needed in Harlow, as well as location of new development in the town, subject to Government guidance set out in the National Planning Policy Framework and National Planning Practice Guidance.

2. Emerging Strategy and Further Options Consultation

- 2.1. Public consultation is an important part of the Harlow Local Development Plan and the Council is committed to involving the community in the preparation of all local planning policy documents, in accordance with national legislative requirements and the Council's Statement of Community Involvement¹ (SCI). As such, care is taken to ensure all key stakeholders are engaged in the consultation process during the preparation of the HLDP, including residents, businesses, statutory bodies, local groups and hard-to-reach groups.
- 2.2. The Emerging Strategy and Further Options consultation was the second stage in the preparation of Harlow's Local Development Plan (HLDP), aiming to answer a number of key questions including:
- How much development is needed to meet the town's needs?
 - What approach would best deliver the Council's corporate objectives?
 - What form of development would reflect the unique character of the town?
 - What are the main constraints and limitations to delivering development that need to be considered?

Consultation Materials

- 2.3. The table below details the consultation materials and their availability:

Material	Availability
Main consultation document	<ul style="list-style-type: none"> • Hard copies available for viewing at the Civic Centre, Harlow Central Library, Old Harlow Library and exhibitions • Hard copies available for obtaining by residents and local groups (upon request); • Hard copies available for purchase by commercial bodies (upon request); • Downloadable from the Council website
Summary leaflet	<ul style="list-style-type: none"> • Obtainable from Civic Centre, Harlow Central Library, Old Harlow Library and exhibitions • Downloadable from the Council website
Printed questionnaire*	<ul style="list-style-type: none"> • Obtainable from Civic Centre, Harlow Central Library, Old Harlow Library and exhibitions • Downloadable from the Council website
Online questionnaire*	<ul style="list-style-type: none"> • Accessible on the consultation portal via the Council's website
Sustainability Appraisal	<ul style="list-style-type: none"> • Available for viewing at the Civic Centre, Harlow

¹ At the time of the Emerging Strategy and Further Options consultation, the extant SCI was adopted in 2007. A review of the SCI has since been finalised and adopted following a period of public consultation, meaning the SCI: Review is now the adopted SCI for Harlow. The revised SCI reflects changes in national legislation and consultation best practices since 2007.

	Central Library, Old Harlow Library and exhibitions • Downloadable from the Council website
CD**	• Obtainable from exhibitions and on request from the Council
Evidence Base documents, including the Green Wedge Review, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and Spatial Options Study	• Hard copies available for viewing at the Civic Centre (upon request) • Downloadable from the Council website

* The paper questionnaire and online questionnaire asked the same questions.

** The CD also contained the Statement of Community Involvement: Draft Review, which was being consulted on in parallel with the Emerging Strategy and Further Options consultation document.

- 2.4. The consultation document set out information on:
- the background behind the consultation
 - the issues and challenges facing Harlow
 - why new development is needed
 - five alternative examples suggesting how and where development could be accommodated in and around Harlow
- 2.5. The summary leaflet provided an overview of the five development examples set out in the main document.
- 2.6. The Sustainability Appraisal, which was carried out by independent consultants, assessed the social, environmental and economic effects of the development examples and forms an integral part of the preparation of the HLDP. Further Sustainability Appraisals will be carried out as the HLDP is prepared, ensuring that sustainability considerations inform the development of policies and proposals.

Please refer to Appendix 4 for more information on the Sustainability Appraisal.

Getting involved

- 2.7. The Emerging Strategy and Further Options consultation took place between **Monday 14 April and Friday 30 May 2014**. This length of period allowed for Bank Holidays and exceeded the Council's normal commitment (set out in the adopted SCI) to consult for a 6-week period at this stage.
- 2.8. Respondents were encouraged to read the consultation document and to complete a questionnaire on the consultation portal via the Council's website. Alternatively, paper questionnaires could be completed and returned to the Council. Representations could also be emailed or posted without filling in the questionnaire.
- 2.9. The questionnaire contained 'closed' questions (i.e. 'yes / no', 'please tick all that apply' and 'please rank'). The questions primarily related to the five development examples presented, with other questions relating to the level of development

proposed, the importance of certain principles in locating future development and the possibility of a 'blend' of development examples. Respondents were able to provide additional comments for each question by completing the comments box at the end of the questionnaire.

- 2.10. When responding to the consultation, respondents had to provide their contact details, as anonymous responses could not be accepted. This ensured that the process was fair and transparent. Respondents were also given the opportunity to 'opt out' of being added to the Harlow Local Development Plan database which is used to notify interested parties of updates relating to preparation of the HLDP.
- 2.11. Respondents could also speak to Council Officers in person or by telephone, but only written representations could be considered.

Notification Methodology

- 2.12. All consultees on Harlow Council's LDP database, who had not opted out of being kept informed, were notified about the consultation either by email or letter depending on their preference.
- 2.13. The notification emails/letters:
- provided information about the consultation;
 - stated where documents could be viewed in public places and online;
 - explained how responses to the consultation could be made and when they should be made by;
 - reminded the recipient that they were being contacted as they were on our consultation database; and
 - stated that if the recipient no longer wished to be on the database, they could request removal (specific consultees and local hard-to-reach groups could request that their details be changed to a more appropriate contact in their organisation).
- 2.14. A Consultation CD was also sent to specific consultees and local hard-to-reach groups who had a preferred communication method of 'post'.
- 2.15. A total of 1,468 letters (150 of which included a CD) and 913 emails were sent to consultees.

Please refer to Appendices 6 and 7 for a list of consultees and respondents to the consultation.

Public Exhibitions

- 2.16. Three staffed public exhibitions were held across Harlow during the consultation period as follows:
- St John's Arts & Recreation Centre, Old Harlow, Tuesday 13 May – 3pm to 9pm
 - Latton Bush Centre, Wednesday 14 May – 3pm to 9pm
 - Harvey Centre, Wednesday 21 May – 10am to 5pm

- 2.17. Two unstaffed exhibitions were also on display at public places in Harlow:
- Civic Centre, Monday 14 April to Friday 30 May
 - Harlow Central Library, Thursday 22 May to Friday 30 May
- 2.18. At the exhibitions, people could view displays of the five development examples contained in the consultation document. Visitors to the exhibitions could also pick up a copy of the summary leaflet, a consultation CD and a paper questionnaire. At the staffed exhibitions, members of the Council's Forward Planning Team were present to answer questions from members of the public and provide more information.
- 2.19. A total of approximately 170 people attended the staffed exhibitions, with additional people viewing the unstaffed exhibitions. Approximately 350 leaflets and 250 paper questionnaires were collected by visitors to the exhibitions. Details of the exhibition venues, dates and times were published on the Council's website. The exhibitions were also advertised via a press release in the *Harlow Star*.

Please refer to Appendices 12, 13 and 14 for more information on the exhibitions.

- 2.20. A presentation was given to fifteen members of the Harlow Youth Council followed by a discussion on the strategies and growth options. This helped ensure the consultation reached the younger people of Harlow, as young people are often one of the hardest groups to reach during consultations.

Please refer to Appendix 5 for more information on the presentation.

Further Press and Publicity

- 2.21. Following a Special Cabinet meeting to agree the content of the consultation, a press release was published in the 30 January 2014 edition of the *Harlow Star* to advertise the consultation in the Spring. The release was also published in the Spring 2014 edition of the *Harlow Times*.

Please refer to Appendices 9 and 10 for more information on the press releases.

- 2.22. A further press release was published in the 10 April 2014 edition of the *Harlow Star* to advertise the start of the consultation and explain how responses could be made. The press release was also published on the Council website and was reproduced on various news websites including the *Your Harlow* website. A tweet announcing the start of the consultation was sent through the Council's Twitter account and a news banner was placed on the Council's website homepage to advertise the consultation. A poster was also displayed in the window of the reception of the Civic Centre.

Please refer to Appendices 11, 15 and 16 for more information on this publicity.

3. Analysis of overall response

3.1. There were a total of 117 responses to the consultation, broken down as shown below. The majority of responses were in the form of questionnaires completed online or representations submitted by email. Many of the submitted questionnaires included additional comments.

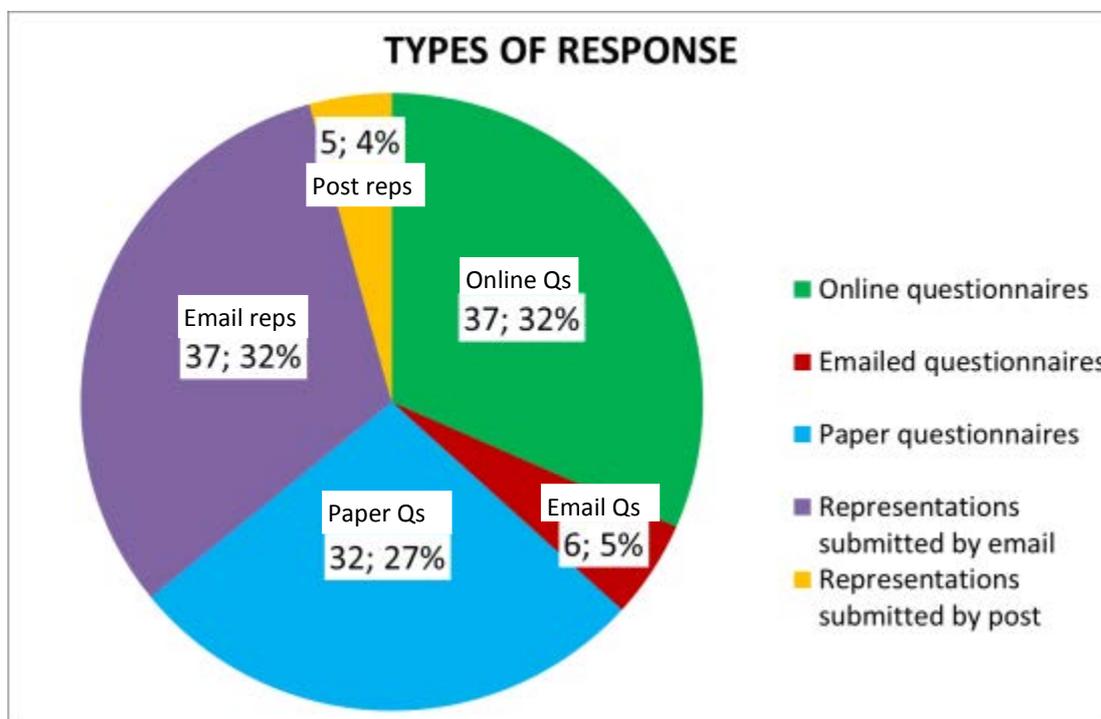


Fig. 3.1

3.2. A total of 101 people/organisations responded to the consultation, either by completing a questionnaire and/or submitting a representation. The number of responses is greater than the number of respondents because some respondents submitted a questionnaire and also a separate representation.

3.3. The respondents have been split into four sub-groups for analysis purposes, as shown below.

Sub-Group	Type of Respondents
1: Harlow Residents and Resident/Community Groups	<ul style="list-style-type: none"> • Harlow Residents • Harlow Resident/Community Groups/Associations
2: Specific Consultees and Local Groups, Businesses & Organisations	<ul style="list-style-type: none"> • Adjacent Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Local Businesses • Local Groups and Organisations (including faith groups, disability groups, environmental)

	groups and ethnic minority groups) <ul style="list-style-type: none"> • Partner Agencies • Other Groups/Organisations
3: Adjoining Parishes Residents and Other Residents	<ul style="list-style-type: none"> • Residents from East Hertfordshire DC area • Residents from Epping Forest DC area • Other Residents
4: Local Developers, normally via Planning Consultants/Agents	<ul style="list-style-type: none"> • Local Developers (responses normally submitted via Planning Consultants/Agents)

3.4. The chart below displays the number of respondents to the consultation, split by sub-group. Most of the responses received were from Sub-Group 1.

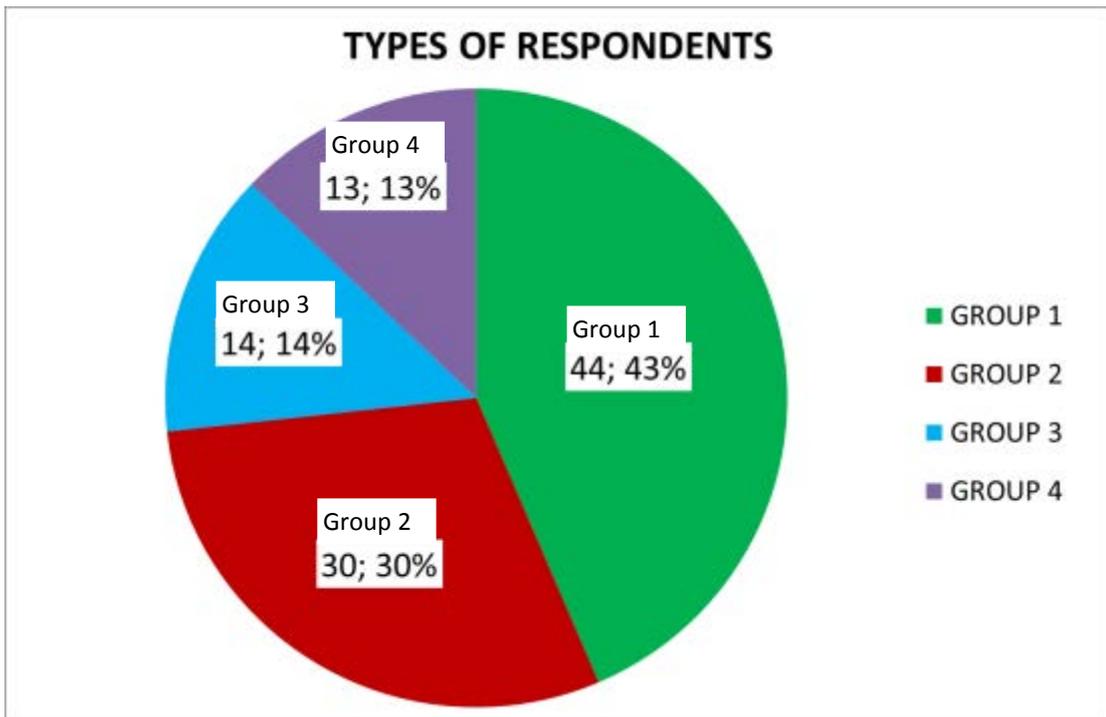


Fig. 3.2

Please refer to Appendix 7 for more information on the respondents.

4. Analysis of consultation responses

- 4.1. The questionnaire consisted of closed questions, but respondents had the opportunity to provide additional comments about individual questions and/or general issues relating to the consultation. Alternatively, respondents could submit representations without filling in a questionnaire. A number of representations were received which contained supporting technical documents, plans and maps; such representations were generally received from planning consultants/agents (on behalf of local developers) and specific consultees.
- 4.2. For analysis purposes, the responses to the consultation have been split by the questions in the questionnaire. For each question the following analysis is provided:
- explanation of the question
 - charts to display the responses²
 - commentary of the main issues arising from submitted comments relating to that question
 - comments relating to that question (the sub-group of the person/organisation who submitted each comment is also stated)
- 4.3. Comments relating to specific questions are reported in Appendix 1; comments which are not question-specific are reported in Appendix 2; and all comments (question-specific or otherwise) made by specific consultees, such as adjoining authorities, are reported in Appendix 3.
- 4.4. Responses to the consultation – including comments submitted via the questionnaire, standalone representations and any supporting documents – can be viewed, searched and downloaded from the Local Development Plan consultation portal via the Council website at <http://www.harlow.gov.uk/local-plan> The author (and organisation, where applicable) of each response is also provided.

STOP Harlow North petition

- 4.5. A petition was sent to East Herts Council by the STOP Harlow North campaign group in response to the consultation on the East Herts District Plan consultation which was undertaken earlier in 2014. The same petition was sent to Harlow Council as a representation to the Emerging Strategy and Further Options consultation. However, the petition did not directly answer the questions in the consultation questionnaire as the petition was tailored for the East Herts Council consultation.
- 4.6. A total of 1,846 people – mostly residents of East Hertfordshire – signed the petition and stated their agreement with STOP Harlow North's statements that development to the north of Harlow (in the Gilston area) would be unsustainable and not financially viable due to a lack of supporting infrastructure, and that the creation of Gilston Great Park is a preferred alternative.

² Five charts are provided for each question: one for all respondents and four for each of the sub-groups. The charts detail the number of responses received for each answer and the associated percentage. Note that some of the sub-groups had lower response levels than the others and care should therefore be taken in any statistical analysis for these sub-groups.

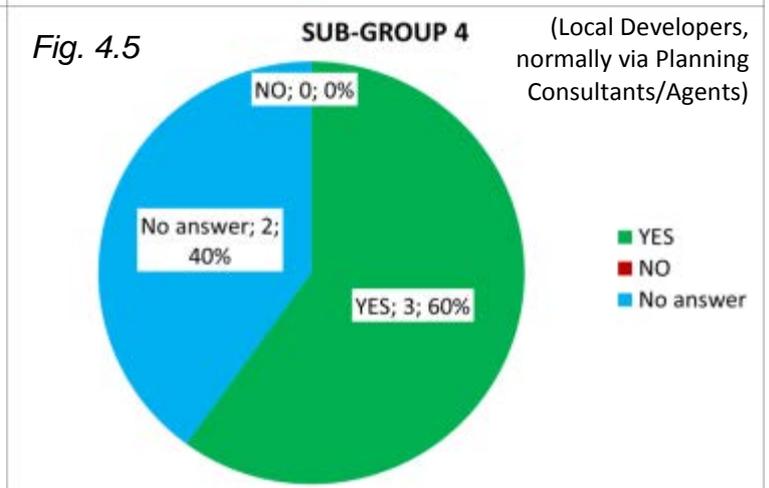
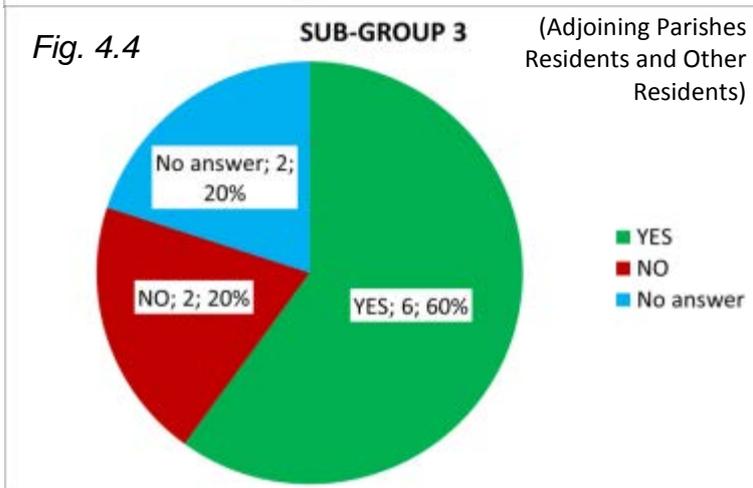
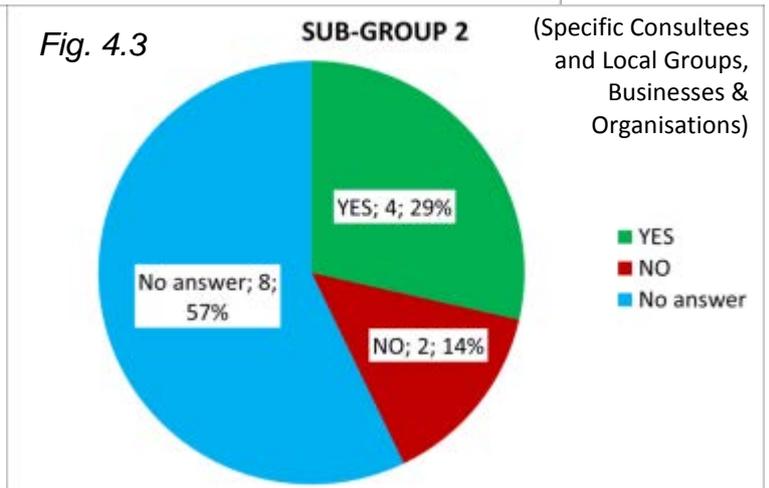
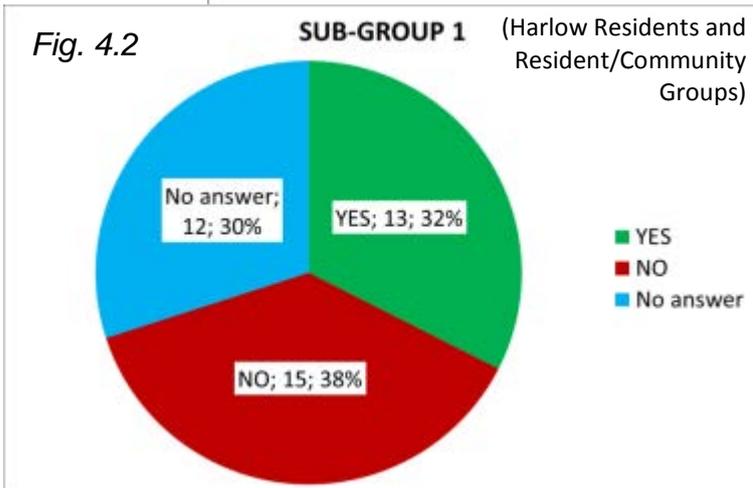
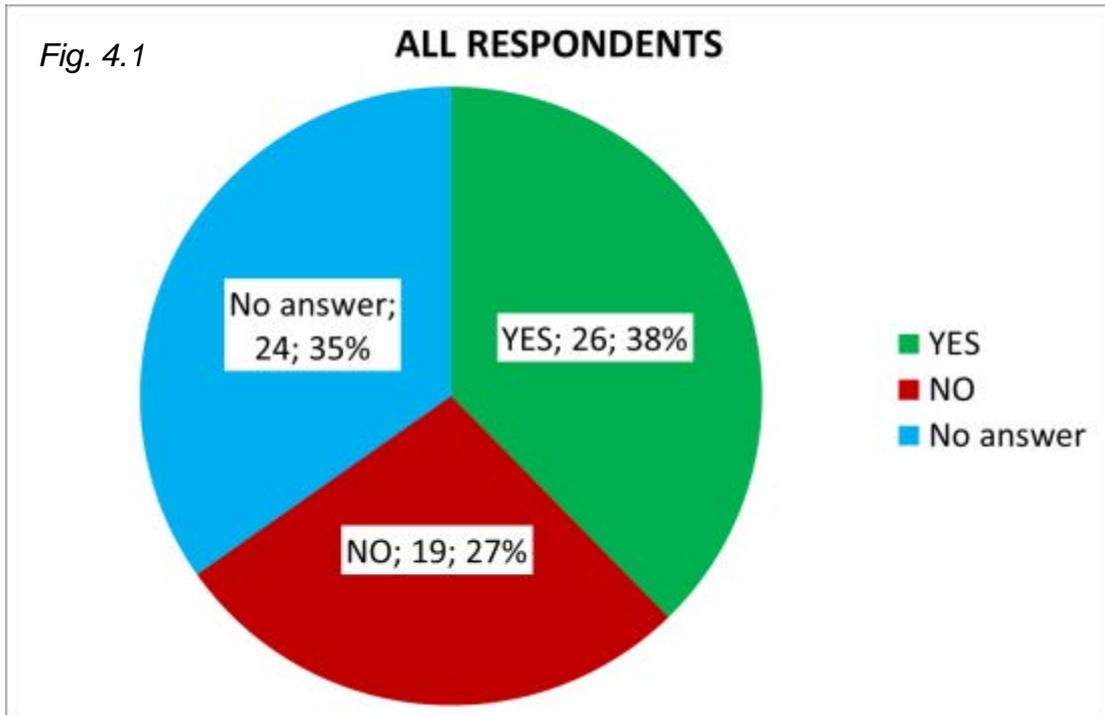
- 4.7. The development examples which include development to the north of Harlow also include development elsewhere. It cannot therefore be assumed that signatories of the petition would be opposed to all such examples.
- 4.8. Some of the comments made by the signatories relate to cross-boundary issues. Therefore, in order to ensure fairness is maintained and that responses to the Harlow Council consultation are not misinterpreted, the responses from the petition have been considered separately in Appendix 2.

Question 1

With [national government policy and the Council's objectives] in mind do you think that the level of development proposed for Harlow between 2011 and 2031 would deliver the Council's objectives as set out on page 20?

- 4.9. The National Planning Policy Framework, which is national Government planning policy, requires the Council to boost significantly the supply of housing to meet the needs of the community. This means 'no growth' is not an option for the Local Development Plan.
- 4.10. Additionally, the Council has a number of core priorities which it is aiming to achieve during the lifetime of the emerging Harlow Local Development Plan, including providing more and better housing, delivering a growing, sustainable and regenerated Harlow, and stimulating a thriving economy.
- 4.11. This question sought views on whether the level of development set out in the consultation document (i.e. 12,000 to 15,000 new dwellings and 8,000 to 12,000 new jobs between 2011 and 2031) would deliver the Council's objectives.
- 4.12. The majority of respondents who answered the question stated that the level of development **would** deliver the Council's objectives (38% answered 'yes', 27% 'no' and 35% did not answer). This response was broadly reflected across the sub-groups, except for sub-group 1 where the majority answer was 'no'.
- 4.13. Figures 4.1 to Fig. 4.5 visually represent the breakdown of responses to the question.

QUESTION 1: Graphical Representation of Responses



4.14. A number of comments were submitted about this question and the proposed growth levels in general. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:

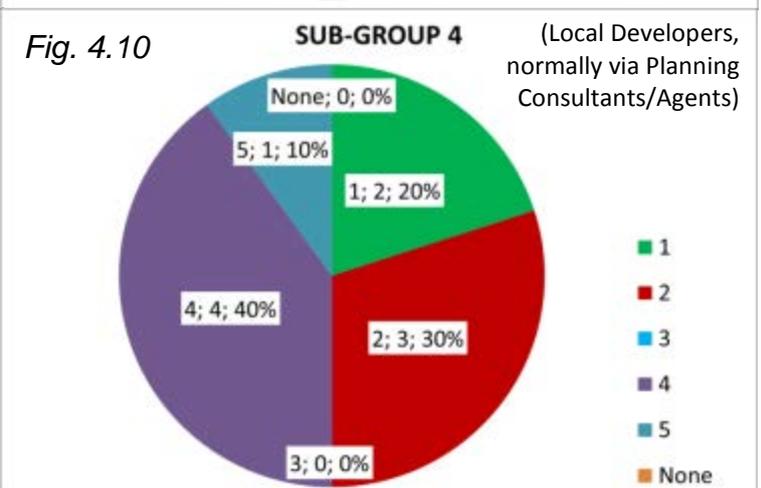
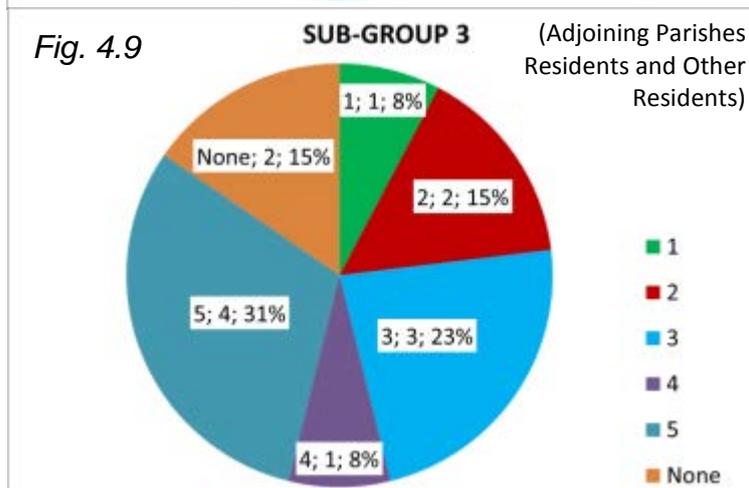
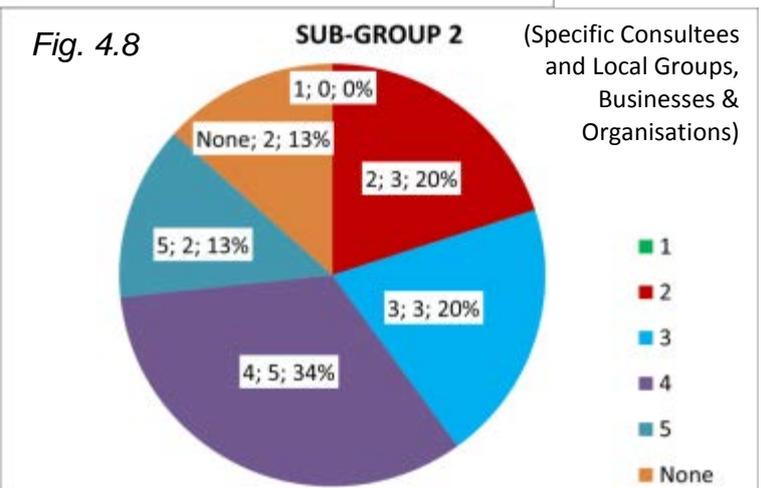
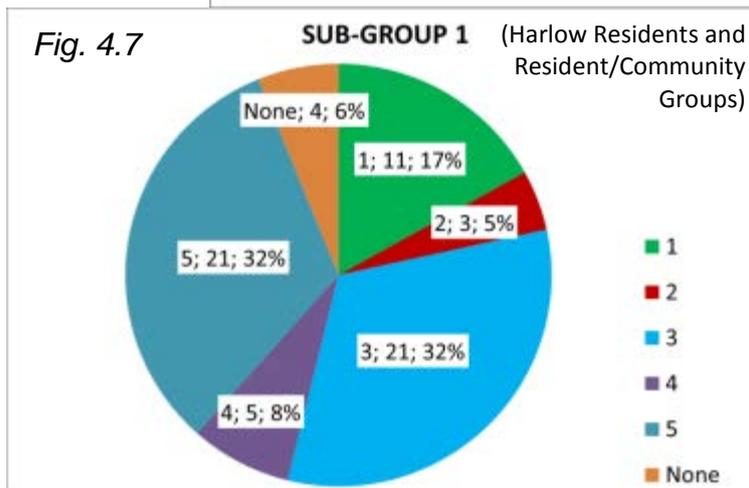
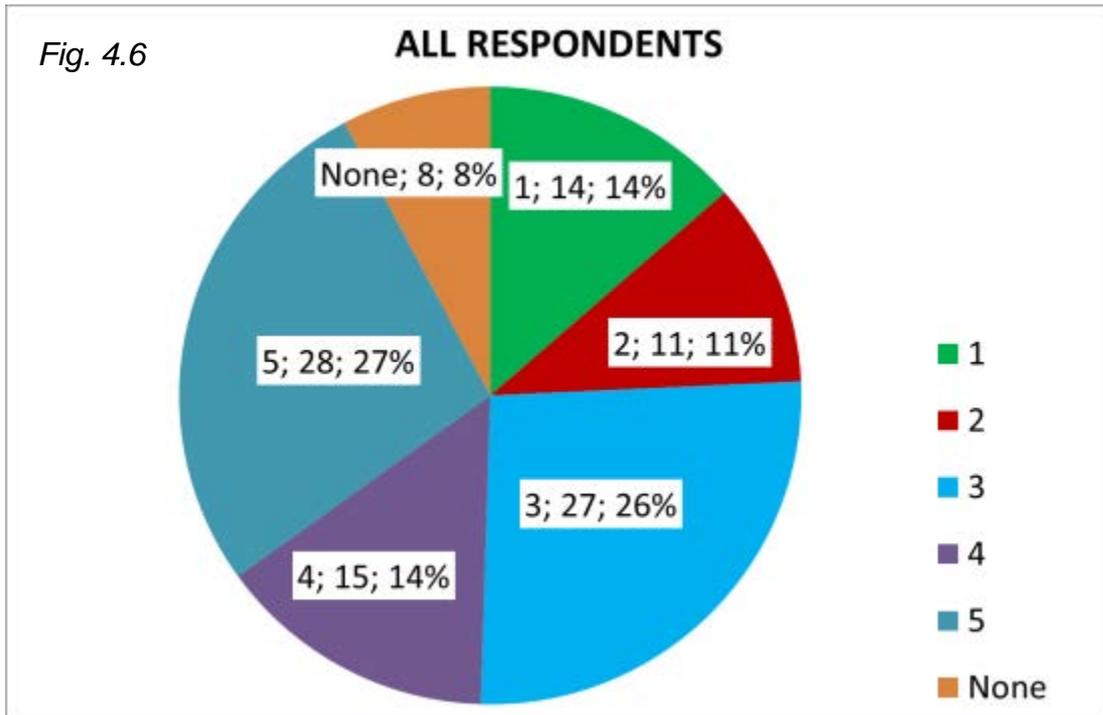
- proposed growth levels are excessive and unsustainable;
- 'do nothing' is not an option;
- shortfall from the current plan needs to be considered;
- need for a Green Belt Review;
- a higher target is needed for housing and jobs;
- number of houses needed in the Harlow Joint Working Area needs to be identified through the duty to co-operate;
- new housing, particularly affordable housing, is fundamental for a sustainable future and will deliver regeneration;
- other authorities have not allowed for Harlow's housing shortfall;
- other factors need to be considered in the calculation of housing requirements;
- proposed increase in Harlow is disproportionate compared to other areas;
- lack of infrastructure affecting the economic and social viability of new developments;
- impact of neighbouring councils;
- housing needs of workers;
- amount of social housing proposed;
- potential extent of regeneration needs to be considered;
- SHLAA overstates the potential availability and capacity of land; and
- need to change the mix of dwelling types and tenures needs addressing

Question 2

Which example(s) do you feel come closest to delivering the Council's stated vision and core priorities for the Local Plan?

- 4.15. Alongside the core priorities for the Local Development Plan, a vision for how the emerging planning strategy reflects the corporate policies of the Council was provided in the consultation document. The vision sets out a number of changes that the town should have secured during the lifetime of the emerging Local Development Plan, including sufficient housing to meet local needs, a significant increase in the provision of affordable homes, new development to revitalise key areas, a reduction in the amount of vacant and underused land, and the provision of excellent education facilities.
- 4.16. This question asked respondents to choose which of the five development examples contained in the consultation document come closest to delivering the Council's vision and core priorities. Respondents could choose one or more example, or a 'none of the above' option.
- 4.17. Examples **3 and 5** were the two most popular choices, with a combined total of over 50%. Only 8% of responses stated that none of the options would deliver the Council's vision and core priorities. These responses were broadly reflected across the individual sub-groups.
- 4.18. Figures 4.6 to 4.10 visually represent the breakdown of responses to this question.

QUESTION 2: Graphical Representation of Responses



4.19. A number of comments were submitted about this question and the development examples in general. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:

- support for examples 3 & 5, as growth to the north of Harlow fulfils a number of essentials not available in the south-west of Harlow, including sufficient transport infrastructure;
- concerns over potential of increased commuting;
- provision of rented affordable housing not clear;
- concerns over viability of Examples 1, 2 & 4 due to infrastructure issues;
- Examples 1, 2 and 4 are most appropriate as they would deliver growth, regeneration and investment benefits, and provide potential for landscape and ecological enhancement;
- Example 3 was preferred for its growth in the north of Harlow which is considered the most sustainable option;
- development to the east of Harlow (e.g. examples 2, 4 and 5) could facilitate a new M11 junction, extend the network of green wedges and maximise use of public transport;
- examples 3 and 5 have negligible regeneration potential;
- examples 2 and 4 are too focussed on prioritising the landscape to deliver sufficient regeneration;
- lack of protection of the town's distinctive character and heritage in the examples;
- relevance of the examples as they do not encompass all the objectives;
- lack of economic revitalisation and supported development & change in the examples;
- importance of choosing sites that can be delivered in the short-term to meet the key objectives; and
- reasoning behind the inclusion of land in certain examples and not others

Question 3

Please rank, in order of priority (1=most important, 4=least important) how important the following principles are to you in locating future development across Harlow:

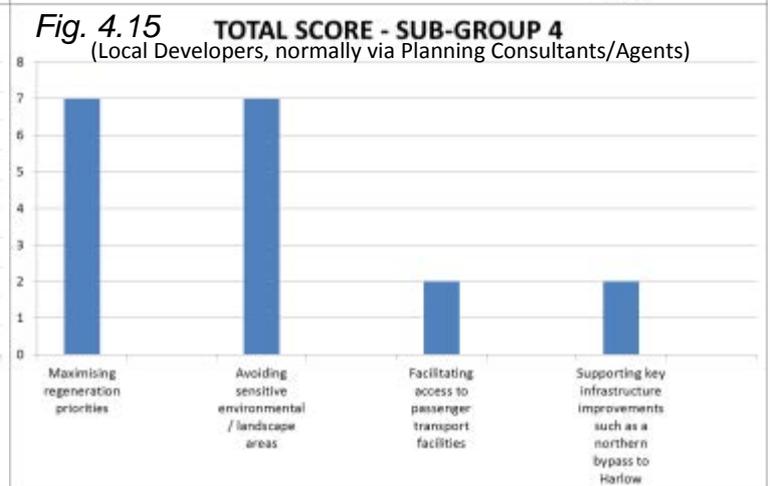
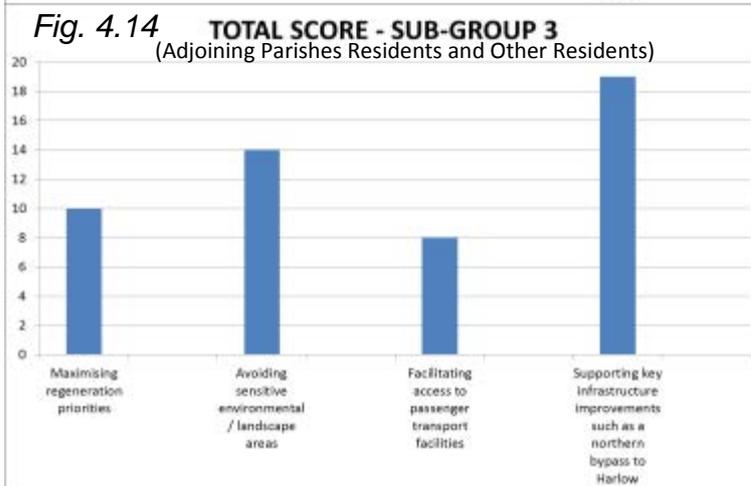
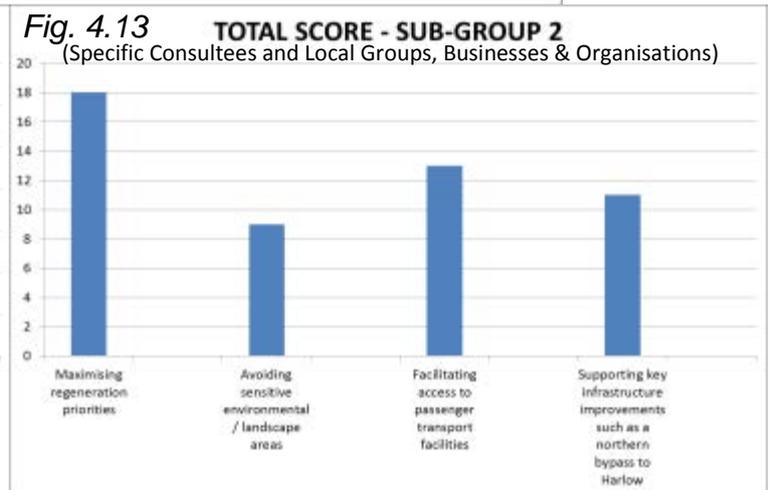
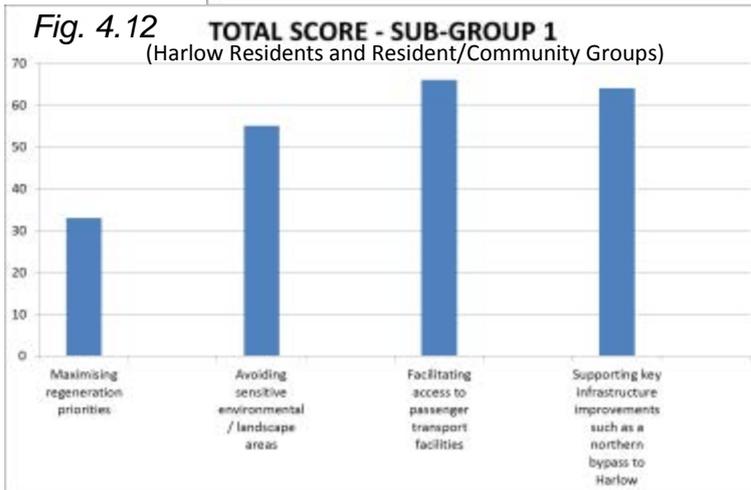
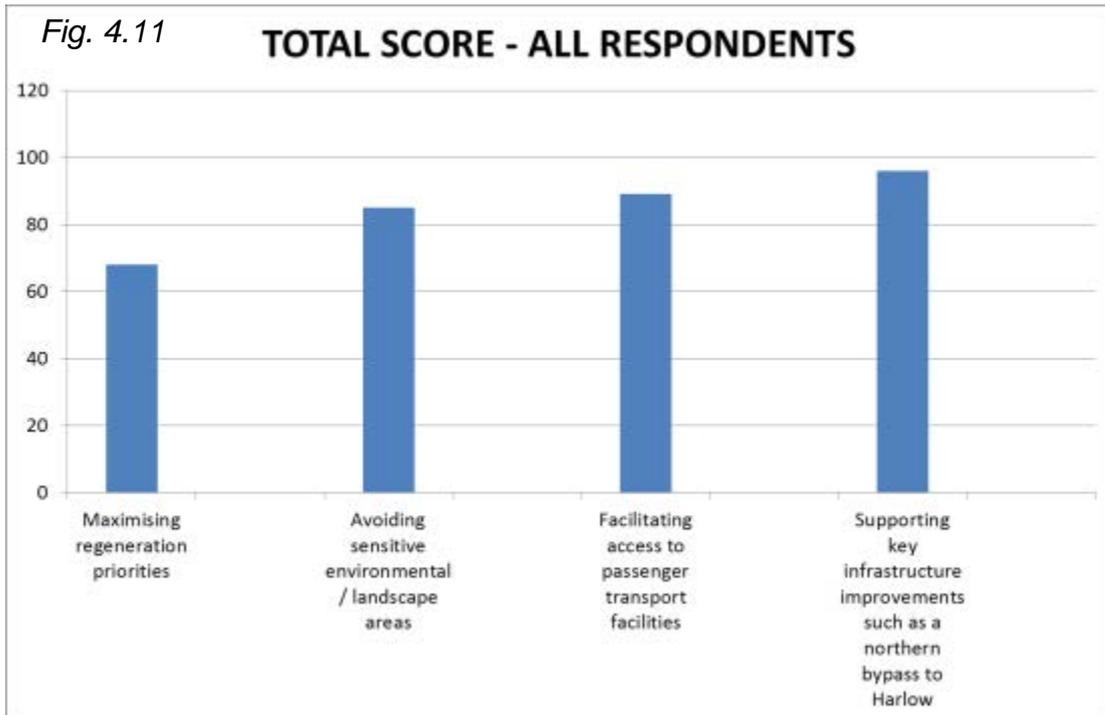
- *Maximising regeneration priorities*
- *Avoiding sensitive environmental/landscape areas*
- *Facilitating access to passenger transport facilities*
- *Supporting key infrastructure improvements, e.g. a northern bypass to Harlow*

4.20. This question sought views on the four principles (above) in deciding where to locate future development across Harlow. Respondents were asked to rank the principles depending on how important they think they are. The results were then analysed.

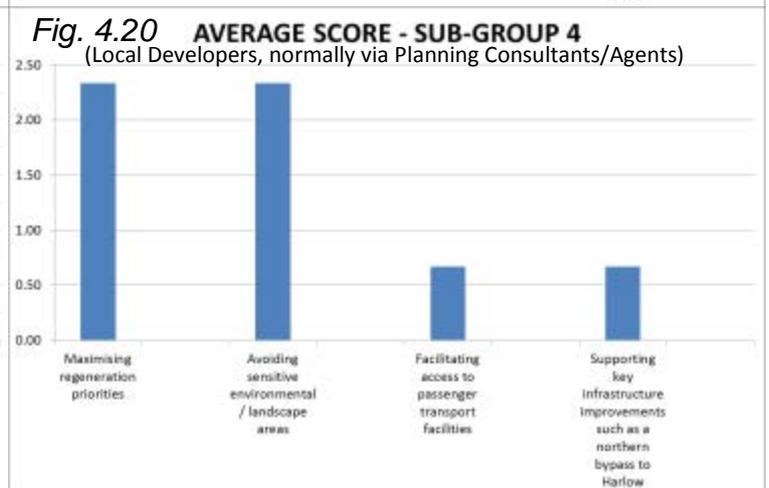
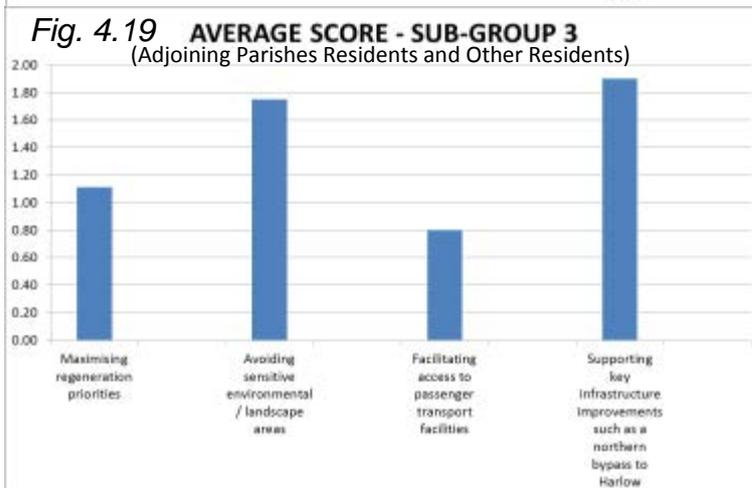
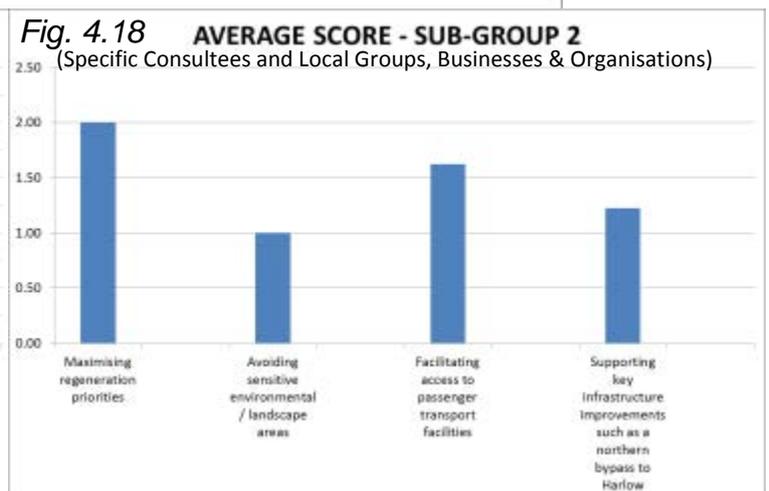
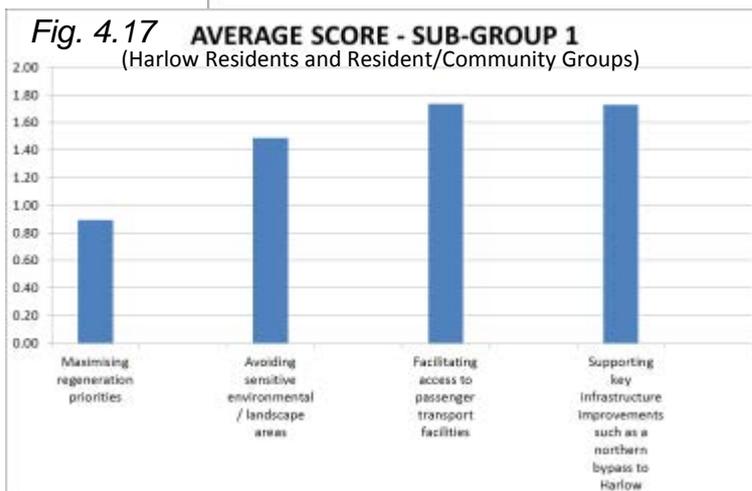
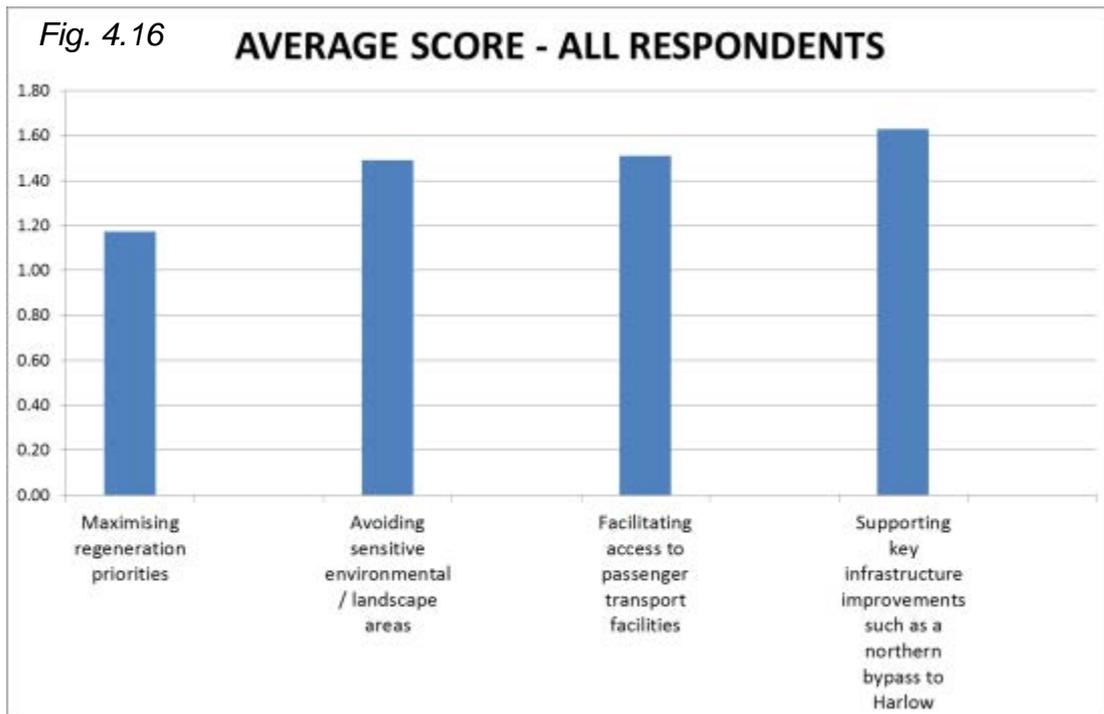
4.21. The factor which received the highest analysis score (and is therefore the most important factor) was **supporting key infrastructure improvements** such as a northern bypass to Harlow. The most important factor varied by individual sub-group.

4.22. Figures 4.11 to 4.20 visually represent the breakdown of responses to the question.

QUESTION 3: Graphical Representation of Responses (1)



QUESTION 3: Graphical Representation of Responses (2)



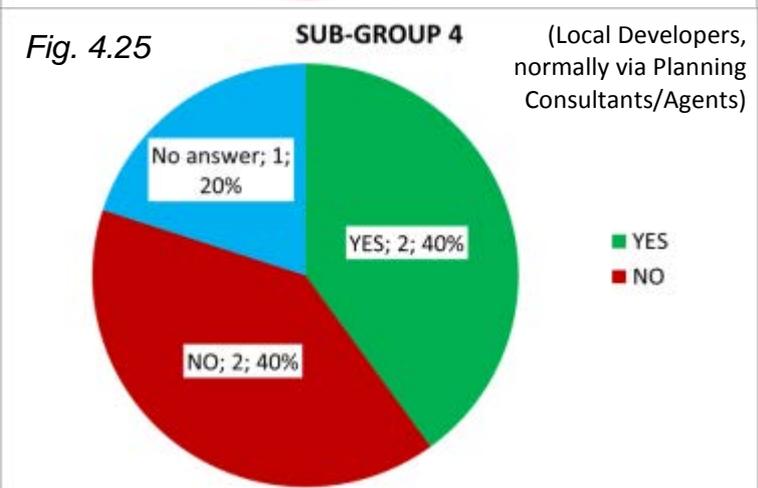
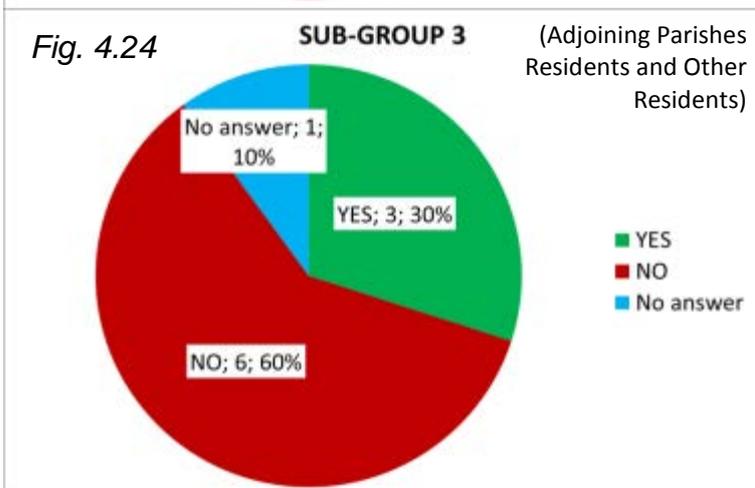
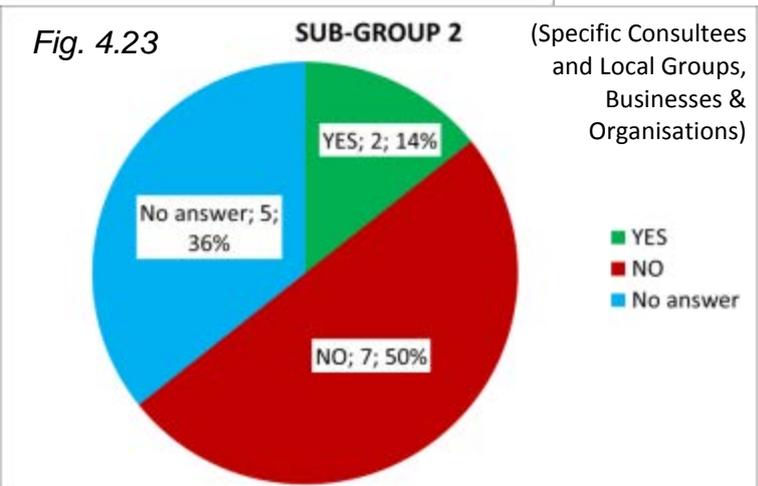
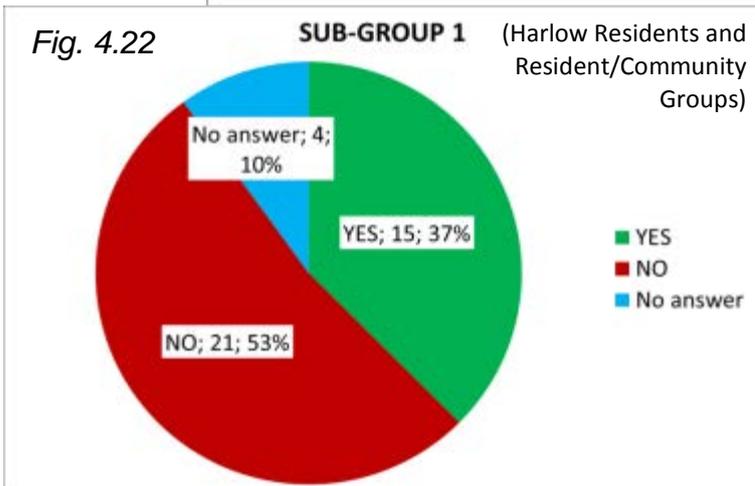
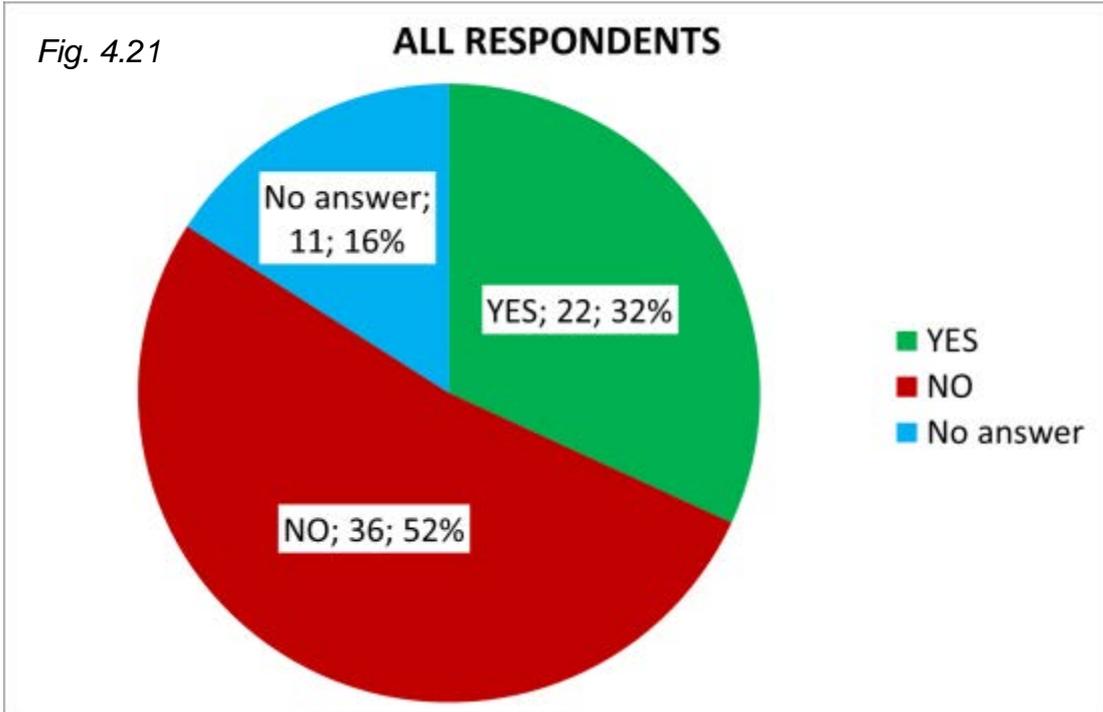
- 4.23. A number of comments were submitted relating to this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- regeneration should be the key principle to meet the core priorities;
 - enhancement of public transport and infrastructure are part of achieving successful regeneration;
 - regeneration is beneficial in assisting with solving deep rooted social and economic deprivation; and
 - it is wrong to rank the principles because they are interdependent and the five examples do not address all the objectives and priorities.

Question 4

Do you think the locations included in the Focused on Priority Regeneration Areas Example 1 are likely to deliver the Council's regeneration objectives?

- 4.24. This question related to Example 1 and whether the locations included in it would be likely to deliver the regeneration objectives set out in the consultation document.
- 4.25. Example 1 – Focused on Priority Regeneration Areas – focuses the majority of development in Priority Regeneration Areas to the south and west of Harlow, with the possibility of growth to the north. The example includes the renaissance of the town centre, improvement of neighbourhood centres and hatches, and the reuse of the town's brownfield sites, employment land and some greenfield sites for housing and mixed uses.
- 4.26. The majority of respondents who answered this question stated that the example **would not** meet the regeneration objectives (52% answered 'no', 32% 'yes' and 16% did not answer). This response is broadly reflected in the individual sub-groups.
- 4.27. Figures 4.21 to 4.25 visually represent the breakdown of responses to this question.

QUESTION 4: Graphical Representation of Responses



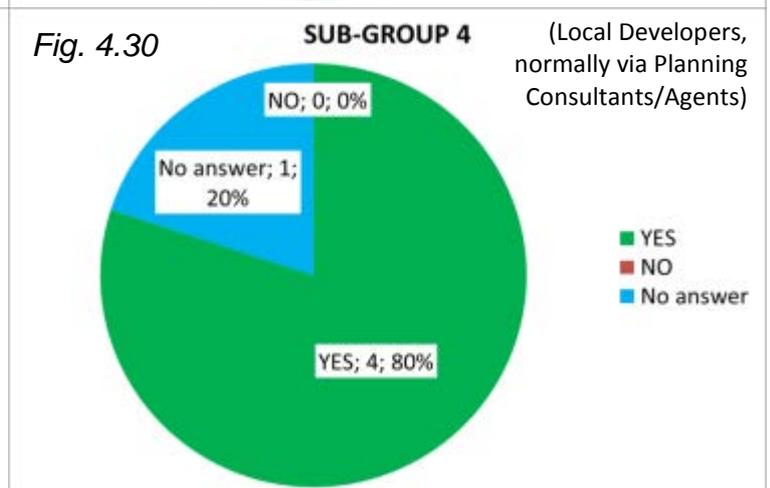
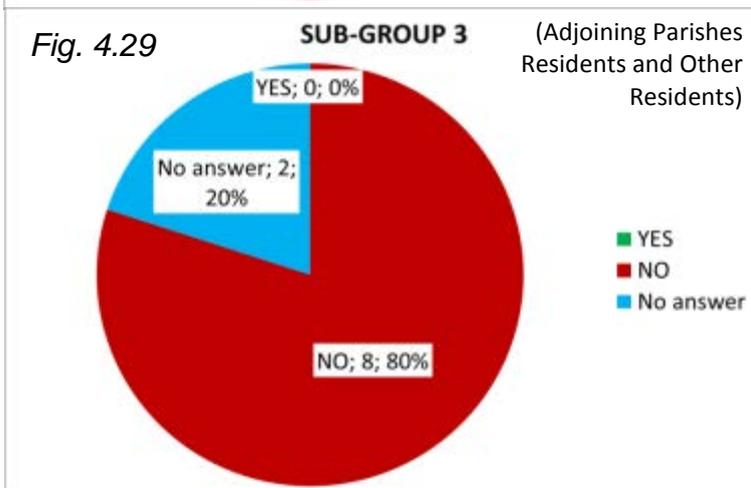
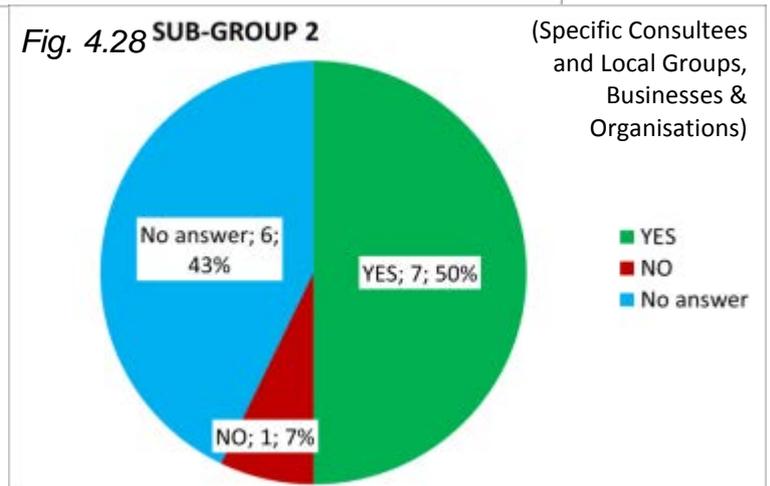
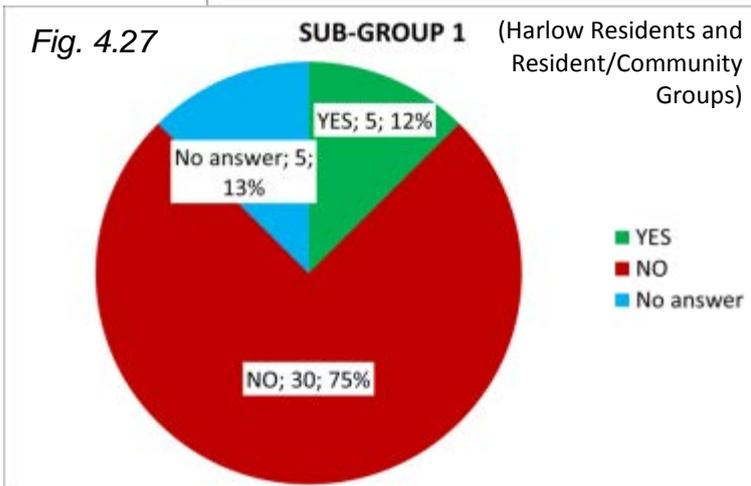
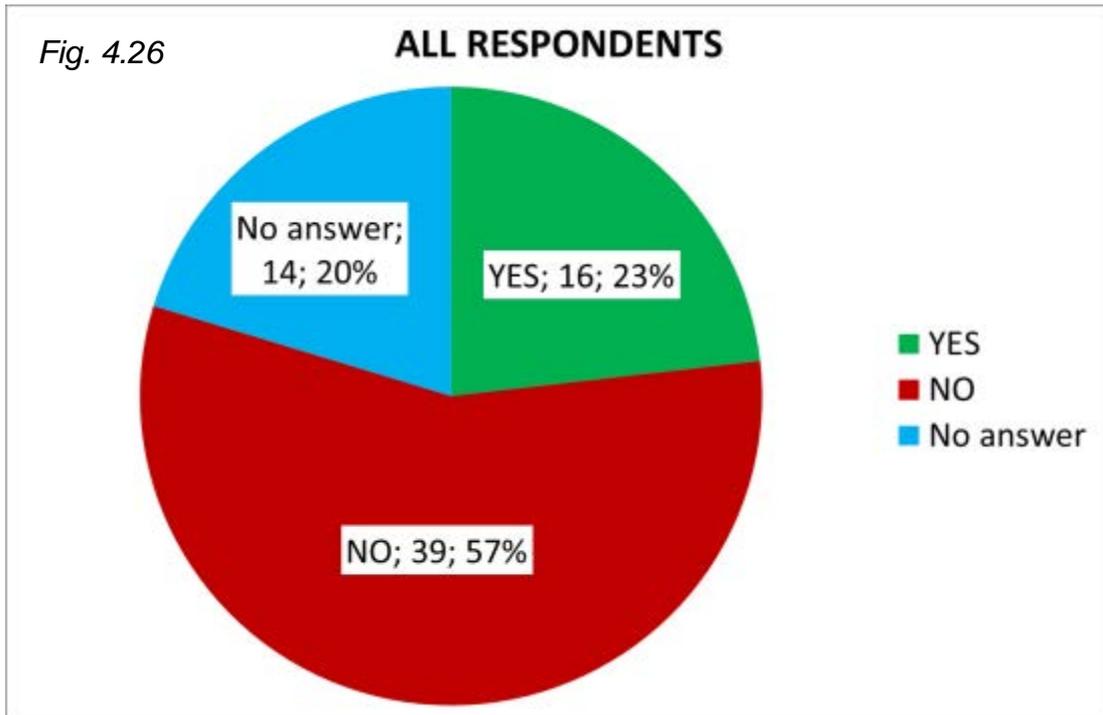
- 4.28. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- loss of Green Belt land to the south of Harlow;
 - increased transport congestion and pollution in the south/south-west of Harlow and associated need for road improvements;
 - effect on the rurality of the area to the south-west;
 - West Sumners would deliver a range of regeneration benefits with development to the east offering some regeneration benefits;
 - land at South Harlow should be allocated for residential and employment development to achieve revitalisation of the town as it is strategically located in relation to the highway network and provides a close link between growth and regeneration;
 - new development must be actively and effectively physically linked to Harlow;
 - regeneration is a matter of investment in the town centre and sustainable neighbourhoods; and
 - the link between growth and regeneration is not guaranteed.

Question 5

Do you think the locations included in the Environmental/Landscape Led Example 2 are likely to reduce environmental/landscape impacts?

- 4.29. This question related to Example 2 and whether the locations included in it would be likely to reduce environmental/landscape impacts.
- 4.30. Example 2 – Environmental/Landscape Led – involves the creation of new neighbourhoods considered to have less impact on the environment and landscape (i.e. to the east and north-east of the town centre), with the possibility of further growth to the south-west of Harlow. This would shift the town’s urban area to the east and minimal change would be experienced in the town centre due to the retention of many features and principles.
- 4.31. The majority of respondents to this question stated Example 2 **would not** be likely to reduce environmental/landscape impacts (57% answered ‘no’, 23% ‘yes’ and 20% did not answer). This was reflected through the individual sub-groups, with the exception of sub-groups 2 and 4 where the majority answer was ‘yes’.
- 4.32. Figures 4.26 to 4.30 visually represent the breakdown of responses to the question.

QUESTION 5: Graphical Representation of Responses



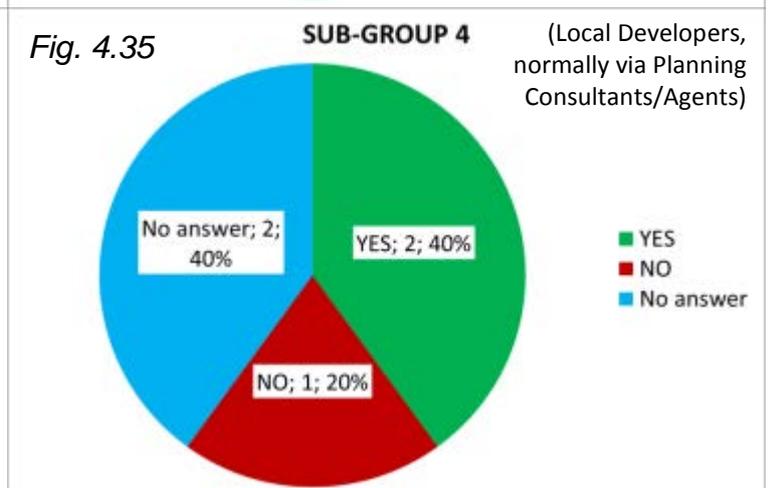
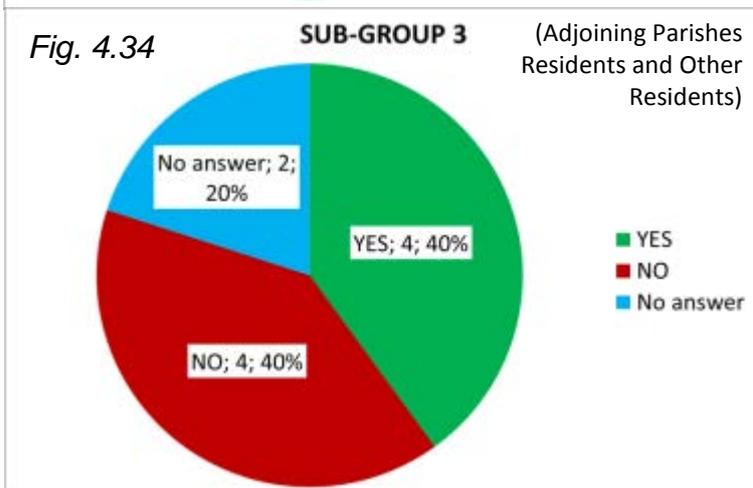
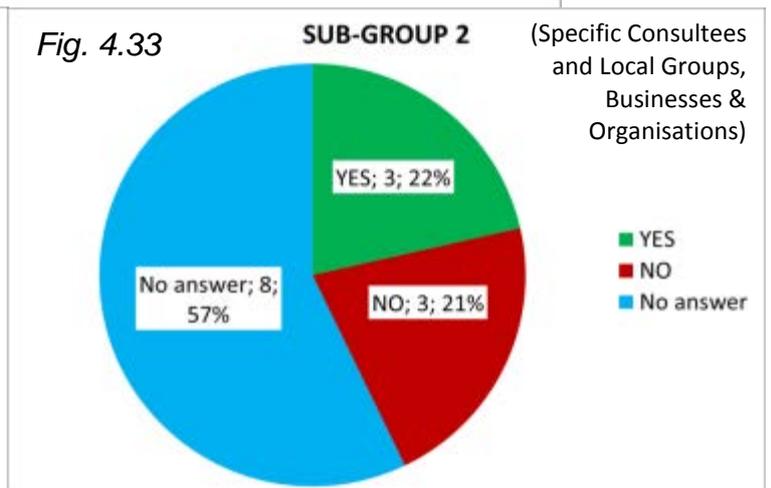
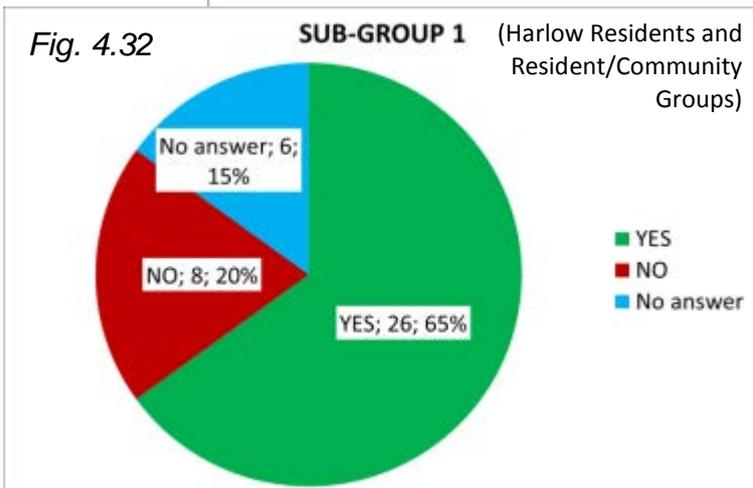
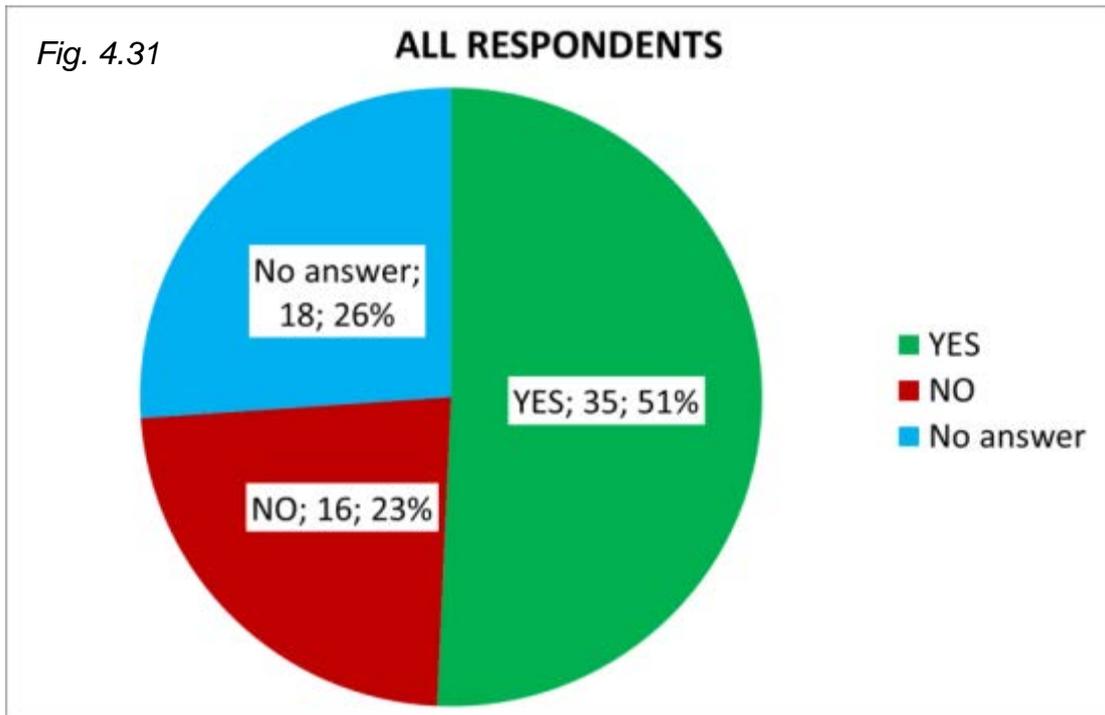
- 4.33. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- example will intensify problems in the south of Harlow and destroy Green Belt land;
 - West Sumners proposals would intensify transport congestion and pollution, necessitating road and other infrastructure improvements;
 - concerns over the inclusion of playing field to the south of Gilden Way which is a well-used community open space;
 - West Sumners site has little ecological impact so should be identified as a preferred location;
 - the locations in this example are likely to minimise environmental/landscape impacts;
 - this example could aid the regeneration of both Pinnacles (employment) and Katherines (residential) with substantial landscape enhancements; and
 - South Harlow benefits from natural visual containment and development at Latton Priory is the option that will minimise environmental and landscape impacts

Question 6

Do you think the locations included in the Passenger Transport-Led Example 3 are likely to deliver passenger transport objectives?

- 4.34. This question sought views as to whether Example 3 would be likely to deliver the passenger transport objectives set out in the consultation document.
- 4.35. Example 3 – Passenger Transport-Led – includes new neighbourhoods in an around areas where opportunities for passenger transport uptake are higher. Most new development would be in northern and eastern parts of Harlow and the town centre – areas which have better access to transport nodes. As such, there would be little change in south Harlow where access to passenger transport is poorest. There is also the possibility of development to the north which would draw more movement into the town centre.
- 4.36. The majority of respondents to this question stated that this example **would** be likely to deliver passenger transport objectives (51% answered ‘yes’, 23% ‘no’ and 26% did not answer). This was broadly reflected across the individual sub-groups.
- 4.37. Figures 4.31 to 4.35 visually represent the breakdown of responses to the question.

QUESTION 6: Graphical Representation of Responses



4.38. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues identified were:

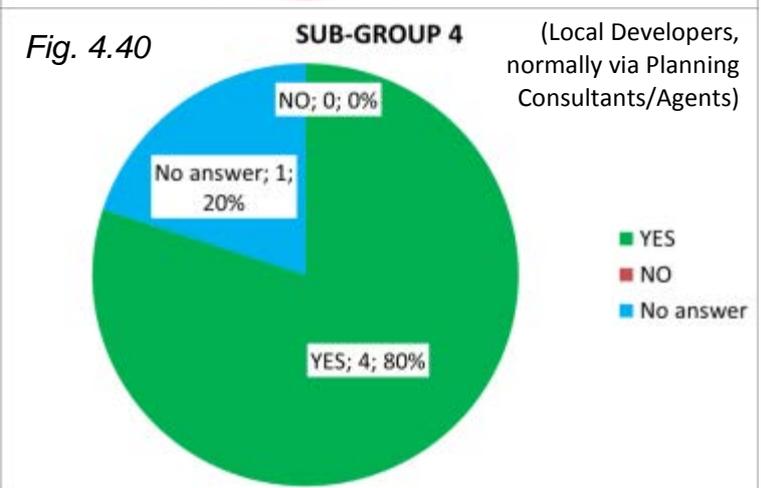
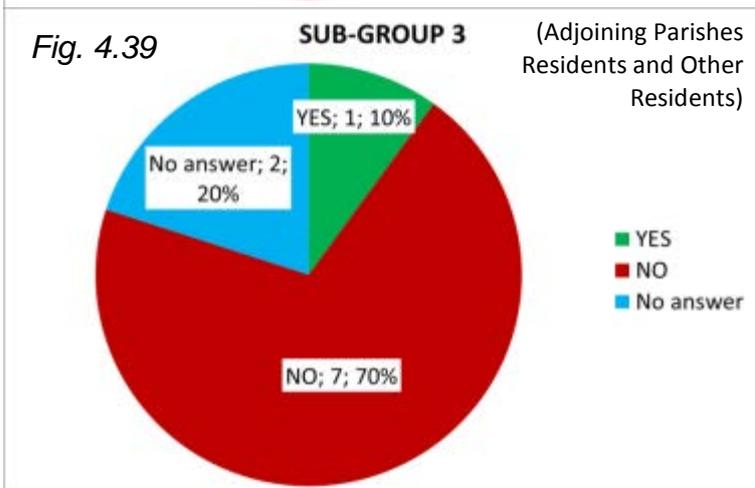
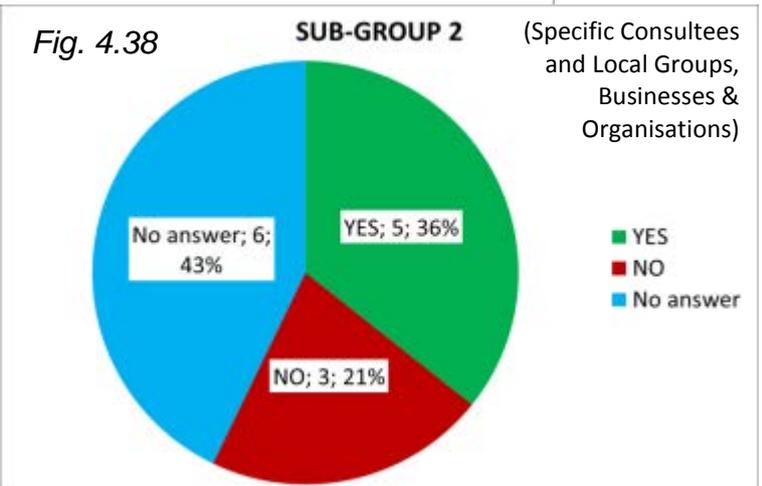
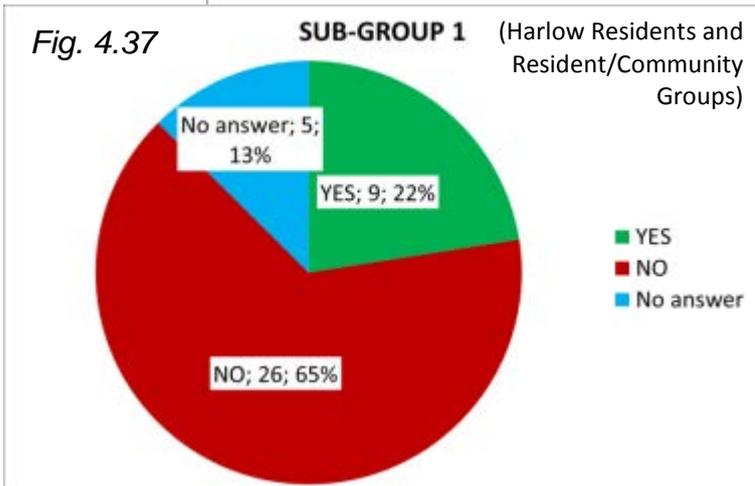
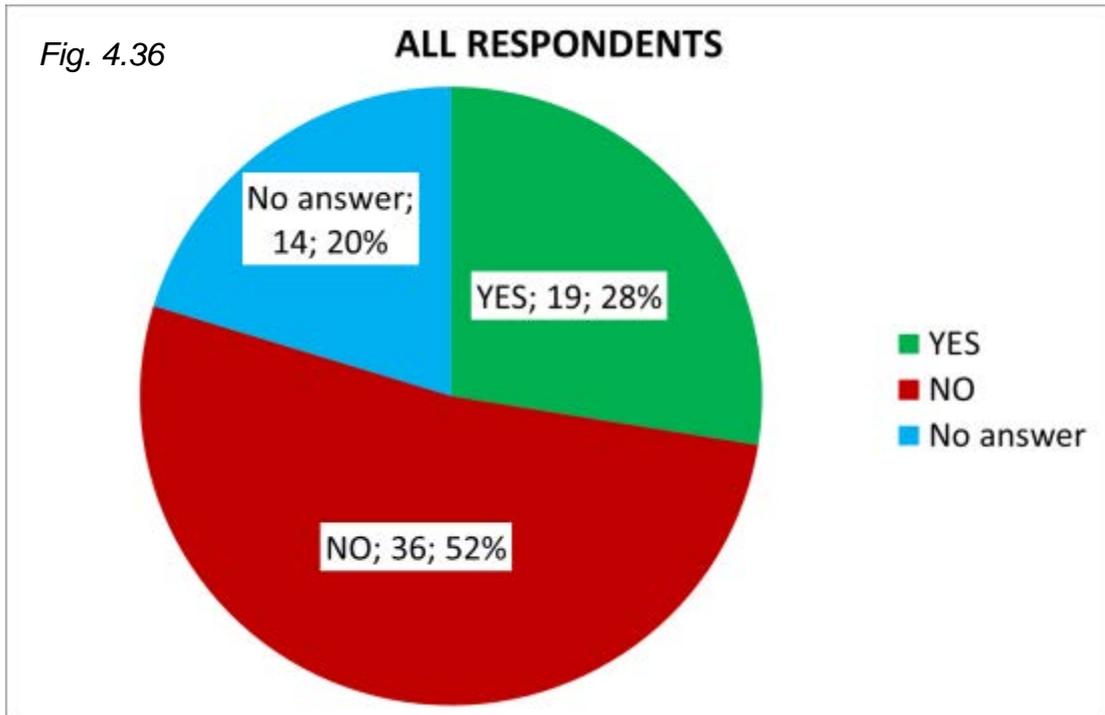
- this example is sensible if infrastructure is provided prior to building houses;
- new bus lanes should not be implemented;
- example limits development to Harlow North which is unrealistic as issues would not be addressed in the short-term;
- high quality linkages between new developments and transport nodes would be needed;
- northern part of East Harlow is geographically closer to a railway station than parts of North Harlow and therefore East Harlow has more public transport uptake potential;
- it should not be assumed that proximity and accessibility are correlated;
- the example has little or no regard to buses;
- growth to the north, which this example focuses on, is considered most sustainable; and
- there is an over-reliance on land within East Herts

Question 7

Do you think the locations included in the Regeneration and Landscape-Led Example 4 are likely to balance regeneration and landscape objectives?

- 4.39. This question sought views on whether Example 4 would be likely to balance the regeneration and landscape objectives which are set out in the consultation document.
- 4.40. Example 4 – Regeneration and Landscape-Led – includes new neighbourhoods in areas considered to have lesser environmental/landscape impacts and areas which would meet regeneration objectives. Regeneration of the town centre is central to this example, with development in and around hatches and neighbourhood centres to assist regeneration. Substantial investment and change would be directed to the east and southwest of Harlow, with the possibility of growth to the west.
- 4.41. The majority of respondents to this question stated that this option **would not** be likely to balance regeneration and landscape objectives (52% answered ‘no’, 28% ‘yes’ and 20% did not answer). This response was reflected in sub-groups 1 and 3; however for sub-groups 2 and 4 the majority answer was ‘yes’.
- 4.42. Figures 4.36 to 4.40 visually represent the breakdown of responses to this question.

QUESTION 7: Graphical Representation of Responses



- 4.43. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- West Sumners proposals would intensify transport congestion and pollution in the south and west of Harlow, necessitating road and other infrastructure improvements;
 - example would lead to the destruction of Green Belt land in the south of Harlow;
 - example could assist the regeneration of Pinnacles (employment) and Katherines (residential) with substantial landscape enhancements;
 - concerns over whether land to the south of Gilden Way is considered to be a less sensitive environmental area;
 - West Sumners site can provide a balance of regeneration and landscape objectives;
 - example does not propose development on key landscape sensitivities;
 - more detailed understanding of landscape issues on a site-scale basis required;
 - omission of South Harlow is curious because it is considered less sensitive than land to the west and south-west in terms of Green Belt constraints; and
 - South Harlow better located to deliver regeneration benefits due to proximity to Priority Estates

Question 8

Do you think the locations included in the Northern Bypass-Led Example 5 are more likely to support a new northern bypass to Harlow?

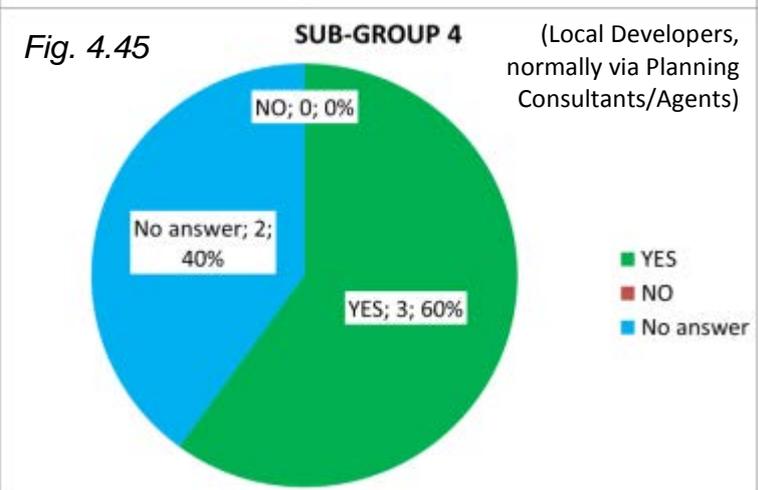
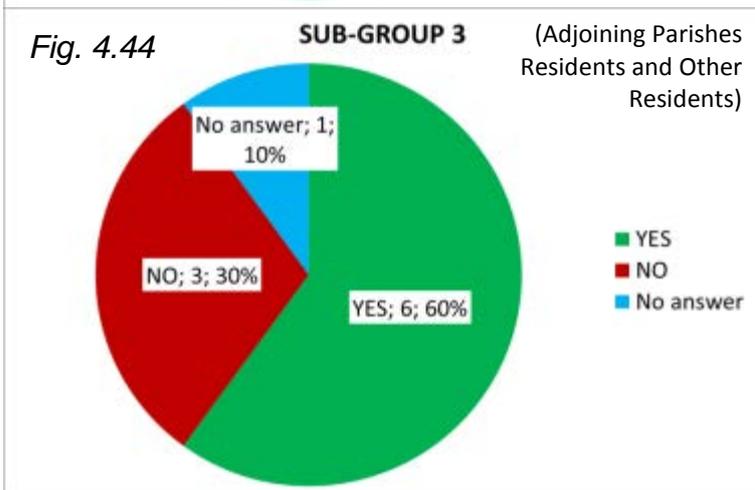
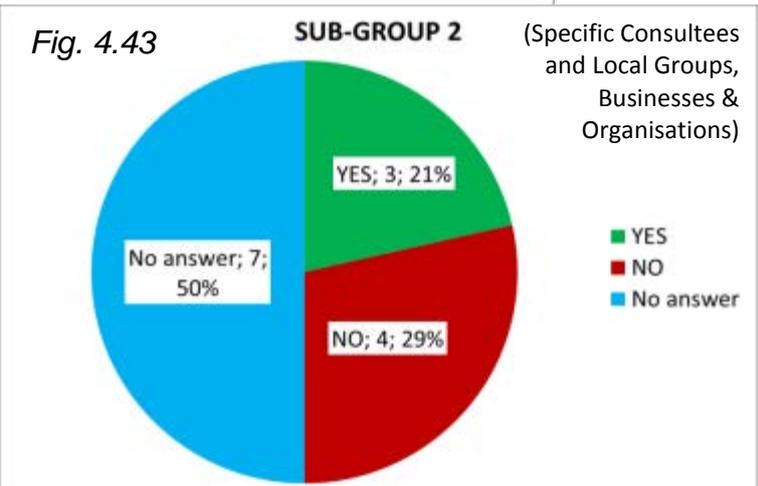
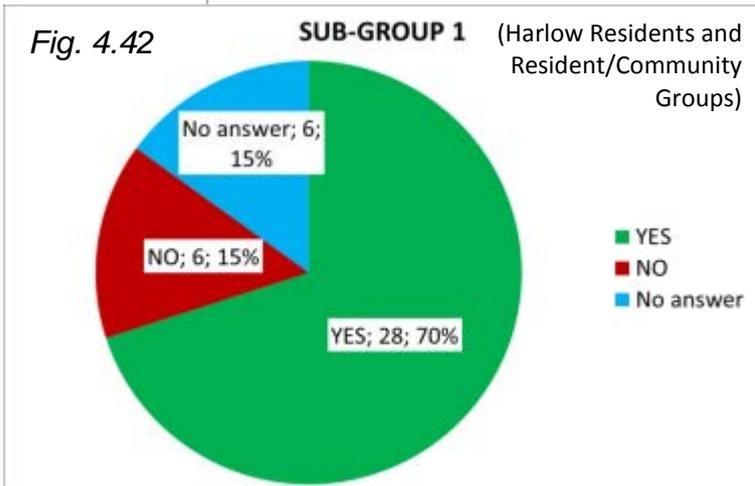
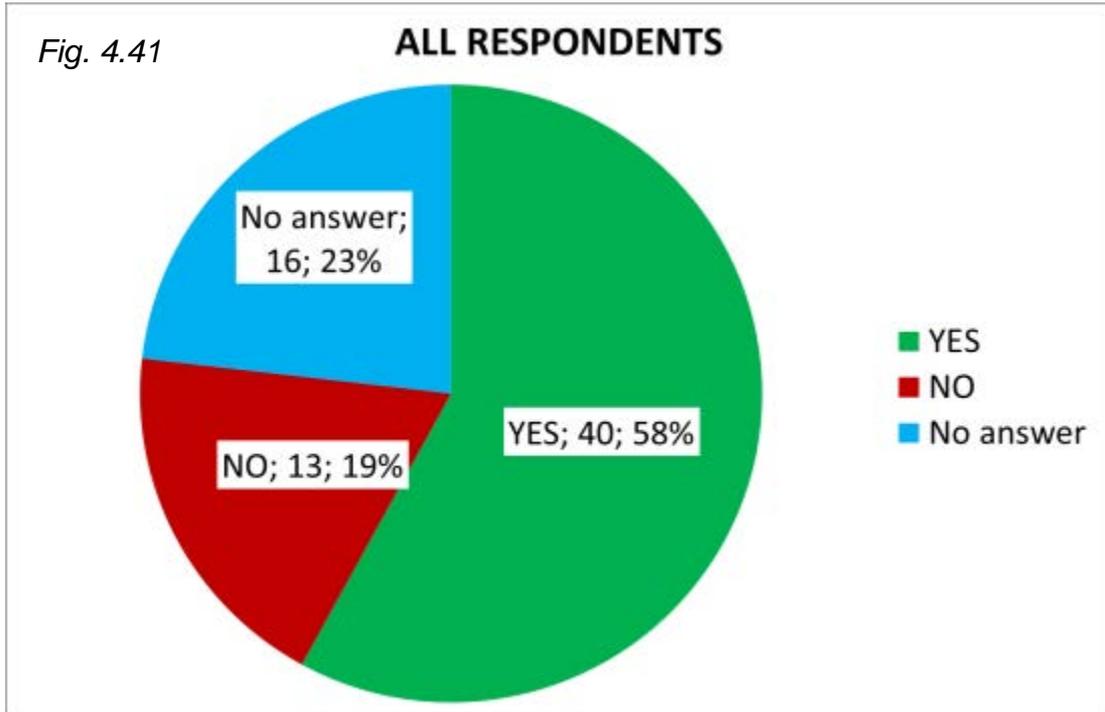
4.44. This question sought views regarding whether Example 5 would be likely to support a new northern bypass to Harlow.

4.45. Example 5 – Northern Bypass-Led – includes development in accordance with the Passenger Transport Led example, with additional development to the north of Harlow to aid the case for a new northern bypass linking a new M11 Junction 7a to new development. Most of the development in this example is to the north of Harlow, with new neighbours in the east and some development in and around the town centre.

4.46. The majority of respondents to this question stated that the example **would** be more likely to support a new northern bypass to Harlow (58% answered ‘yes’, 19% ‘no’ and 23% did not answer). This response is broadly reflected in the individual sub-groups, with the exception of sub-group 2 where the majority answer was ‘no’.

4.47. Figures 4.41 to 4.45 visually represent the breakdown of responses to this question.

QUESTION 8: Graphical Representation of Responses



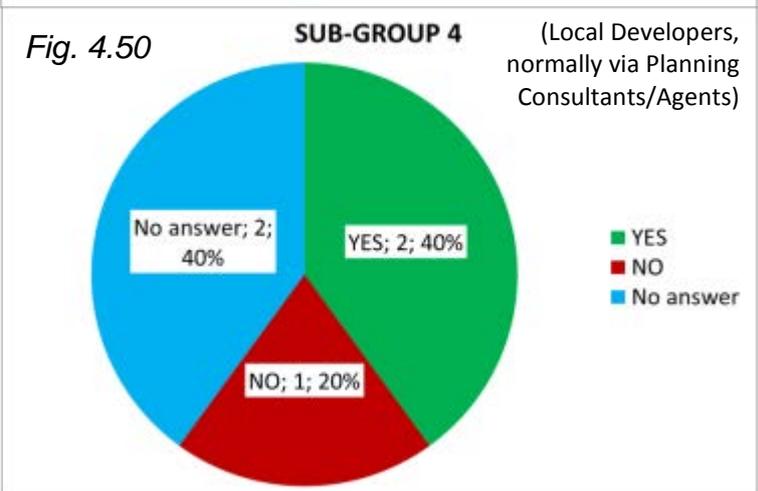
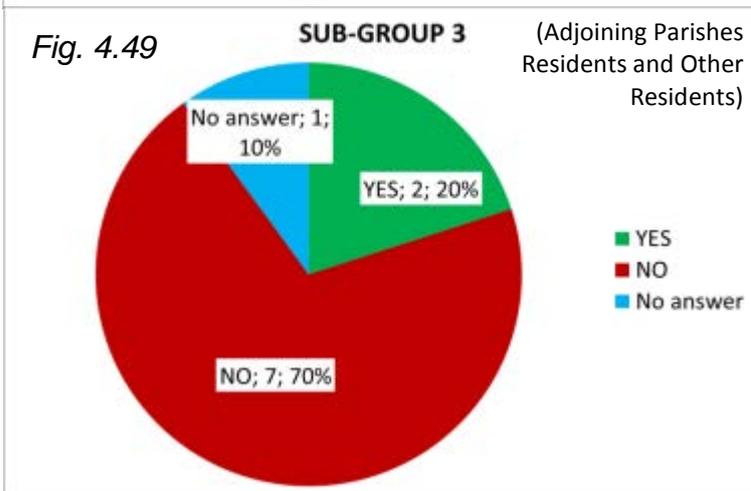
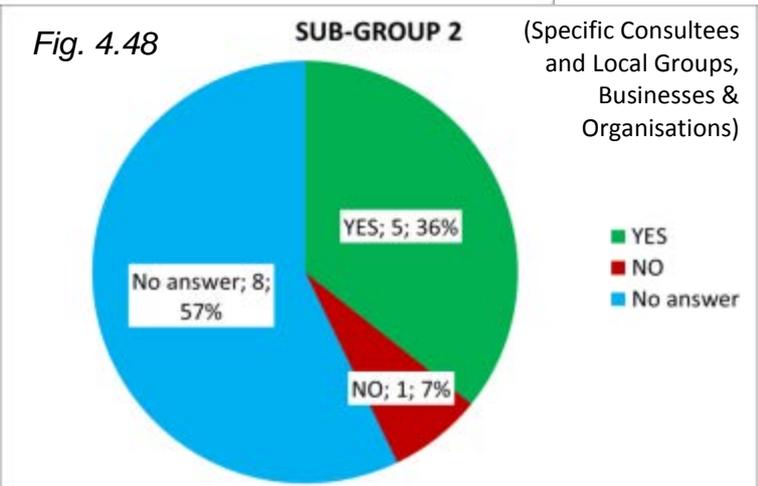
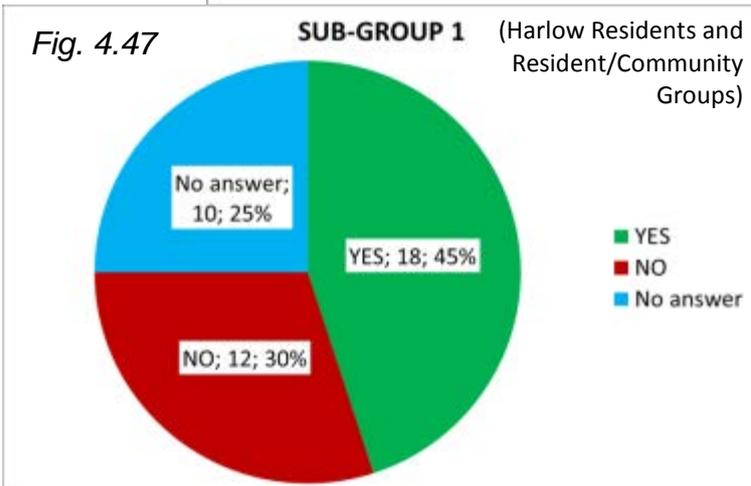
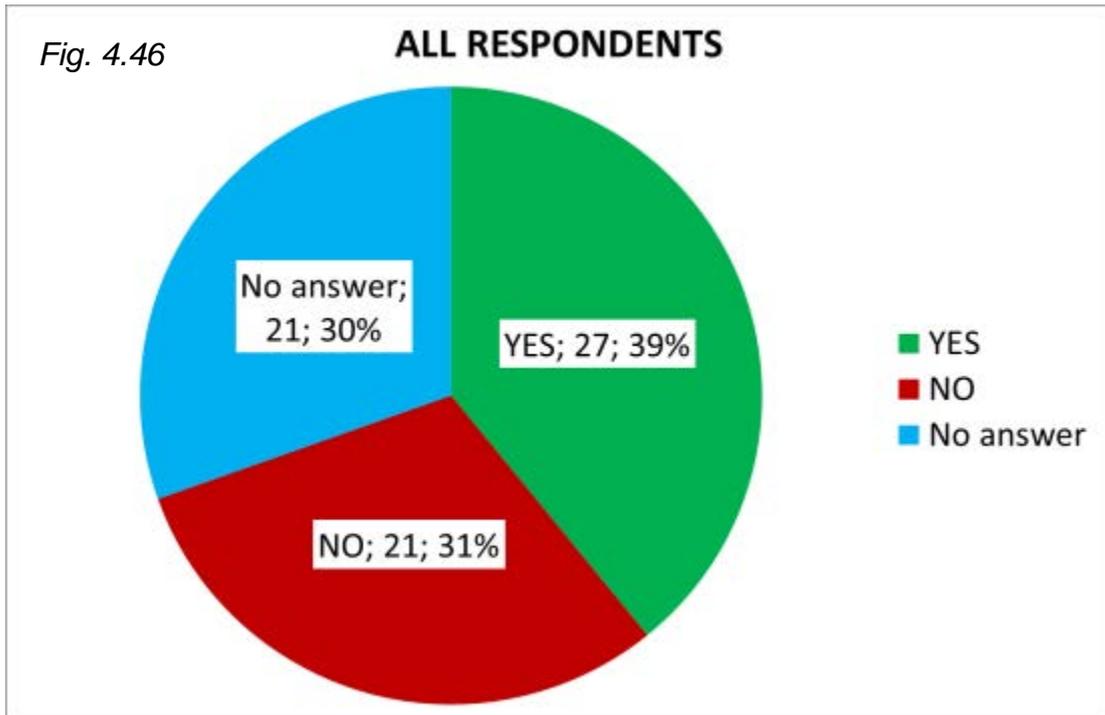
- 4.48. A number of comments were submitted regarding this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- example is sensible if infrastructure is provided before houses are built;
 - example could be at a cost to Gibberd's plan thereby losing the town's heritage;
 - growth in the east of Harlow would facilitate a new M11 Junction 7a and link road to Gildea Way corridor;
 - the technical and financial feasibility and viability of a northern bypass is questionable;
 - previous evidence has suggested a direct link to development at Harlow North could risk such development competing with Harlow;
 - a northern bypass should be funded by a Greater Harlow CIL; and
 - example is focused on single transport measure and does not assess how sites and options could improve transport accessibility in a wider sense

Question 9

Do you think a “blend” of development examples is more appropriate for Harlow?

- 4.49. This question sought the views of people on whether a blend of the development examples would be more appropriate for the future growth of Harlow. Such a blend could include smaller amounts of development which are dispersed in and around the town, rather than focussing large amounts of development in particular areas.
- 4.50. The majority of respondents to this question **agreed** that a blend of development examples would be more appropriate (39% answered ‘yes’, 31% ‘no’ and 30% did not answer). This response was broadly reflected in the individual sub-groups, with the exception of sub-group 3 where the majority answer was ‘no’.
- 4.51. Figures 4.46 to 4.50 visually represent the breakdown of responses to this question.

QUESTION 9: Graphical Representation of Responses



4.52. A number of comments were submitted regarding this question. A more detailed breakdown of the comments is provided in Table 4.9. The main issues raised were as follows:

- blend would be good as Gibberd favoured mixed development;
- a blend is vital for sustainability reasons;
- this is too vague and it would depend on the blend;
- a sustainable approach would be high levels of growth on sites which deliver regeneration, minimise environmental impacts and have good public transport connections, including West Sumners site;
- preferred options are dependent on the outcomes of duty to co-operate agreements with adjoining authorities; and
- a blend of examples is best if all objectives and priorities are encompassed

5. Summary and Next Steps

- 5.1. The consultation set out a housing figure for Harlow together with a number of examples for where development could be provided within the district. These examples will be subject to further assessment taking into account the consultation responses and ensuring the most appropriate outcome for Harlow can be delivered. This will enable the Council to confirm the level of development which Harlow needs and whether some may need to be accommodated in adjoining districts.
- 5.2. The majority of respondents consider the suggested overall level of development would deliver the Council's corporate objectives. Some respondents suggested that further adjustments to the housing requirement figures may be needed, subject to the outcomes of cross-boundary co-operation (the duty to co-operate). In addition an update on development viability will be needed to establish the percentage of affordable housing that can be delivered, and the identification of housing requirements for specific groups such as elderly people and students.
- 5.3. The development examples which received the most support, including support from Harlow residents, were Example 3 (Passenger transport-led) and Example 5 (Northern Bypass-led), which both focus the majority of development to the north and east of Harlow. In respect of development principles, respondents overall considered 'supporting key infrastructure improvements' to be the most important, followed by 'facilitating access to passenger transport facilities'.
- 5.4. Before the Council finalises the Preferred Option the population forecasts provided in the latest Phases of the Greater Essex Demographics Forecasts, future DCLG population/household projections, as well as the results of the revised Strategic Housing Market Assessment will need to be taken into consideration. The level of development proposed will be further refined based on information on infrastructure capacity or mitigation, as well as assessment of the likelihood of the housing sites being completed within the plan period by demonstrating deliverability.
- 5.5. The main issue raised by respondents related to infrastructure capacity and whether the local infrastructure would be able to cope with the proposed levels of development. Comments regarding infrastructure capacity mostly focussed on transport infrastructure (such as roads and public transport provision), sewerage, health facilities and school facilities.
- 5.6. The Council is currently undertaking further work to assess the amount of housing and employment capacity that can be accommodated before a new Junction 7a on the M11 is provided. An Infrastructure Delivery Plan will also be prepared to identify future infrastructure requirements and set out the costs of providing these. Some of this work will depend on the infrastructure requirements of adjoining districts, the implications of which are expected to be resolved through the outcomes of the duty to co-operate discussions. It is considered, however, that delivering the proposed levels of development will necessitate significant improvements to existing facilities and services.

- 5.7. A number of respondents to the consultation questioned whether the Council and adjoining Councils have satisfied the requirements of the duty to co-operate. The Council recognises that the duty to co-operate is a key legal requirement which is essential in order for the Harlow Local Development Plan to be found sound. This requires the Council to engage proactively and regularly with adjoining districts on cross-boundary issues such as transport provision. The Council is seeking to address the duty to co-operate through a programme of engagement with adjoining districts.
- 5.8. Following completion of the work outlined above, the next stage of the Harlow Local Development Plan will be the preparation of the Preferred Options document. This document will set out the preferred level of development for Harlow over the plan period of 2011 to 2031, the preferred strategic development locations, the allocated sites within Harlow, and details of the infrastructure requirements arising from the Infrastructure Delivery Plan together with the supporting policy framework.

Appendix 1: Question-specific comments received

All question-specific comments received are reported in this appendix.

Note that all comments (question-specific or otherwise) made by specific consultees, such as adjoining authorities, are reported in Appendix 3.

The table below, reproduced from Chapter 3, explains how the respondents were categorised into Sub-Groups.

Sub-Group	Type of Respondents
1: Harlow Residents and Resident/Community Groups	<ul style="list-style-type: none"> • Harlow Residents • Harlow Resident/Community Groups/Associations
2: Specific Consultees and Local Groups, Businesses & Organisations	<ul style="list-style-type: none"> • Adjacent Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Local Businesses • Local Groups and Organisations (including faith groups, disability groups, environmental groups and ethnic minority groups) • Partner Agencies • Other Groups/Organisations
3: Adjoining Parishes Residents and Other Residents	<ul style="list-style-type: none"> • Residents from East Hertfordshire DC area • Residents from Epping Forest DC area • Other Residents
4: Local Developers, normally via Planning Consultants/Agents	<ul style="list-style-type: none"> • Local Developers (responses normally submitted via Planning Consultants/Agents)

Question 1

COMMENTS REGARDING QUESTION 1 AND THE PROPOSED LEVELS OF DEVELOPMENT

Comment	Sub-Group
<ul style="list-style-type: none"> • Proposed infrastructure would not meet level of development proposed 	1
<ul style="list-style-type: none"> • Careful look needed at infrastructure needs due to growing population and increase in housing. Developers who do not provide infrastructure will severely compromise the social and economic viability of the town 	1
<ul style="list-style-type: none"> • What is the impact of neighbouring councils? Regional plan required 	1
<ul style="list-style-type: none"> • If the Enterprise Zone creates more jobs, those workers will choose to live in or near Harlow 	1
<ul style="list-style-type: none"> • 8,000 houses more appropriate according to evidence base 	1
<ul style="list-style-type: none"> • Should not be assumed that social housing outweighs other factors such as environmental, transport, infrastructure factors. Additional 4,000 housing to get more social housing not supported by data 	1

• Preferred option is option B (NLP study)	1
• Growth levels proposed are excessive and unsustainable – current infrastructure cannot cope and experience shows infrastructure will not be provided in a timely manner	1
• Maximum growth plans are unworkable – minimum growth option should be adopted	1
• Number of issues are mostly capable of mitigation if attention is paid to population stagnation	1
• Other places should take share of new housing as Harlow has already had a big increase and proposed increase is disproportionate	1
• Suspicions of locals that Epping is dumping its housing need onto a neighbouring town. Locals have hostility to having their lives, communities and environment compromised by a neighbouring town	1
• The Council needs to review its ideas on demographic forecasts. Population did not grow more than 1.5% in 40 years due to bulge in age groups from when building started	1
• The difference in numbers of housing proposed is a significant impact, with a range of approx. 18% to 49% - the plan needs a more precise number to ensure services can be delivered	1
• Accept that to do nothing in respect of growth is not an option	2
• Creation of new dwellings is fundamental to achieving the sustainable future development of Harlow	2
• Level of growth of the order described in Scenario C – Jobs Led – is of the order that would be acceptable, and would meet 95% of the affordable housing requirement	2
• Dwelling numbers are in excess of the 7,485 stated in the Greater Essex Demographic Study. Harlow’s claim seems ‘grandiose’	3
• Harlow, within its boundary, can build 8,900 homes, why not make that number the maximum amount of properties to be built. It exceeds the 7,485 recommended in the Greater Essex Demographic Study?	3
• Unclear as to the number of houses required and how they were calculated.	3
• Referring to NLP study: <ul style="list-style-type: none"> ○ Options A and B fail to meet corporate objectives ○ Option E is too ambitious; Options C and D would discharge duty to co-operate ○ Option D most appropriate as it meets objectives 	4
• It is important to acknowledge that the wider “housing market area” is based on the Harlow Joint Working Area (i.e. including the districts of Epping Forest and East Herts). Therefore, to be fully NPPF compliant, the next iteration of the Plan should have regard to the market and affordable housing needs for the housing market area as a whole. In particular, the Greater Essex Demographic Forecasts (Phase 4) (2013) identify that there is a need for 38,680 homes in the Harlow Joint Working Area between 2011 and 2031 (under the SNPP 2010 scenario). East Herts District Council (EHDC) has recently finished consulting on its own District Plan Preferred Options, including the provision for at least 15,000 new homes between 2011 and 2031. If Harlow District Council (HDC) decides to proceed with a housing requirement of 12,000-15,000 new homes, this will leave a residual figure of some 8,680-11,680 new homes for Epping Forest District	4

Council (EFDC) to accommodate. EFDC has not yet prepared a Preferred Option consultation and it is not clear if this is a scale of growth it is contemplating or can realistically accommodate.	
<ul style="list-style-type: none"> Clearly there is a need for joint working between the three local authorities, including under the Duty to Cooperate, to ensure that the cumulative 2011 to 2031 housing requirement for all three districts meets the overall housing needs of the housing market area. 	4
<ul style="list-style-type: none"> Recommends that HDC adopts a housing requirement of at least 15,000 new homes between 2011 and 2031. Not only will this increase the likelihood of all three districts being able to meet the cumulative housing need in the Harlow Joint Working Area, it will also ensure that all of Harlow's regeneration outcomes are feasible. 	4
<ul style="list-style-type: none"> There can be no doubt that any significant level of new growth in or around Harlow, beyond the committed schemes at New Hall Farm and north of Gilden Way, will necessitate the need for a review of the Green Belt 	4
<ul style="list-style-type: none"> It is clear that the evidence base and current consultation documents for both the emerging Harlow and East Herts Plans fail to respond to the concerns raised by the Panel about growth at Harlow North in 2006. East Herts' approach to the Gilston Area as set out in their draft District Plan and evidence base already demonstrates that development to the North of Harlow is not being planned with Harlow's core priorities in mind. 	4
<ul style="list-style-type: none"> Whilst considering the overall assumptions about the quantum of development required to achieve regeneration are sound it is not considered that development around Harlow will automatically achieve regeneration unless the form of this development and the linkages to and from it are specifically tailored so that this development is part of Harlow rather than separate from it. 	4
<ul style="list-style-type: none"> In terms of the overall quantum of development this should be at the upper end of the range consulted on, ie 15,000 houses. It is clear from the Harlow Futures Study that far greater benefits accrue to the regeneration of the town, which is at the heart of Harlow's vision and objectives for the Local Plan, if higher levels of development can be achieved. 	4
<ul style="list-style-type: none"> Irrespective of the capacity of Harlow to accommodate new housing growth, on the basis the NPPF requirement to viably plan to meet objectively assessed needs for both market and affordable housing - Scenario A, Scenario B and Scenario C should all be discounted from further consideration as their minimum housing targets all fall short of the minimum 12,000 dwellings required to meet both market and affordable housing needs viably during the plan period. 	4
<ul style="list-style-type: none"> It is therefore crucial that the Plan provides for 15,000 dwellings and 12,000 jobs to meet its objectives and ensure consistency with its evidence base. No other conclusion would be sound if the plan is to meet the "positively prepared", "justified" and "effective" tests set out in paragraph 182 of the NPPF 	4
<ul style="list-style-type: none"> 12,000 dwellings unlikely to subsidise affordable housing accommodation required 	4
<ul style="list-style-type: none"> 12,000 dwellings would lead to a shortfall of affordable homes required in Harlow 	4
<ul style="list-style-type: none"> Agree that Harlow should be meeting the requirements of the NPPF by meeting objectively assessed needs for housing, and providing an increased number of affordable homes and jobs across the District, which in turn will help to deliver regeneration objectives 	4
<ul style="list-style-type: none"> East Herts and Uttlesford have recently consulted on their emerging plans and 	4

appear to have made no allowance to accommodate any of Harlow's housing shortfall	
<ul style="list-style-type: none"> EPOA report provides a valuable starting point for objectively assessed needs but will not necessarily provide the full picture because it is wholly demographic in its methods. Other factors that need to be considered include the previous backlog of delivery, the need to improve affordability more generally, the scale of market dwellings to support the delivery of specific affordable housing products, the scale of supply necessary to support economic growth objectives, and the needs of specialist groups such as retirement housing and student accommodation 	4
<ul style="list-style-type: none"> Evidence of the effects of deteriorating affordability will be revealed in the data on overcrowding, concealed and homeless households and the extent of any affordability problem in Harlow 	4
<ul style="list-style-type: none"> Generally support proposed housing range of 12,000 – 15,000 dwellings but suggest that the top end of this range would be required and present the most prudent course of action in light of the scale of the needs of Harlow plus the unmet need in London (at least 7,000 dwellings per year) as well as the actions of other authorities who are not willing to meet their own needs for housing 	4
<ul style="list-style-type: none"> Generally supportive of the 12,000 – 15,000 dwelling range but consider that the Council should be aiming at the top end of this range 	4
<ul style="list-style-type: none"> Harlow has already demonstrated that they do not have a 5 year housing land supply and for this reason additional sites are required in and around Harlow 	4
<ul style="list-style-type: none"> Harlow identifies its housing need as between 12,000 to 15,000 new dwellings. The plan also refers to Harlow's objectively assessed needs as being in the region of 12,000 dwellings as highlighted in the SHMA. Consider this to be outdated and the Council should undertake a NPPF compliant SHMA to consider the present day's economic and social factors in determining housing need 	4
<ul style="list-style-type: none"> Have some sympathy with adopting the range of housing as this will enable the Council to provide some flexibility if demand increases further 	4
<ul style="list-style-type: none"> It is appropriate to have some flexibility in the level of growth at this stage to enable information on viability and infrastructure to be factored in 	4
<ul style="list-style-type: none"> Supply of 15,000 dwellings would also best support the provision of 4,500 affordable dwellings that are needed 	4
<ul style="list-style-type: none"> The local Plan should meet the full objectively assessed needs for market and affordable housing. Based on information from the LPA, this means that the housing requirement in the HLDP should be at least 20,000 dwellings during the plan period 	4
<ul style="list-style-type: none"> The objectives will not be achieved if the spatial strategy is framed in a manner which does not support, as a minimum, the level of growth described 	4
<ul style="list-style-type: none"> The plan fails to identify whether a 20% buffer has been applied to the 12,000 to 15,000 housing target, and should do if the plan is to be found sound 	4
<ul style="list-style-type: none"> The Plan needs to clarify whether the shortfall in housing numbers from the previous Local Plan has been accounted for 	4
<ul style="list-style-type: none"> The provision of at least 15,000 dwellings and 12,000 jobs will deliver the Council's objectives 	4
<ul style="list-style-type: none"> The SHMA fails to take into account of the wider housing shortfall that is predicted in London. It has already been acknowledged by the Mayor that he expects the wider south east to take on an element of this housing shortage. The Harlow Local Plan should detail whether this has been considered 	4

<ul style="list-style-type: none"> • The SHMA needs to be updated and take account of previous under delivery and its impact on household projections 	4
<ul style="list-style-type: none"> • Argue that 30% affordable housing cannot be demonstrated as reasonable unless supported by further robust viability work 	4
<ul style="list-style-type: none"> • General support for Development Scenarios D and E, on the basis of their housing delivery targets exceeding objectively assessed needs and delivering regeneration benefits to Harlow and the wider sub-region 	4
<ul style="list-style-type: none"> • In order to viably meet objectively assessed needs for both market and affordable housing, as well as the wider regeneration objectives of HC, in general support of Development Scenarios D and E. However need to give further consideration to the implications for historic housing shortfall against previous targets within the administrative area 	4
<ul style="list-style-type: none"> • Welcomes the recognition in the ESFO that Harlow District Council (“HDC”) needs to plan for substantial housing and economic growth over the plan period to achieve its market and affordable housing needs, and regeneration requirements 	4
<ul style="list-style-type: none"> • The evidence base work confirms that a minimum of 12,000 homes (or 13,000 homes as states at para 5.48 of the HFPS) are required to satisfy objectively assessed needs. However, as set out in the table at paragraph 4.21 of the ESFO this quantum of development (ie Scenario C) does not deliver a number of key regeneration objectives for Harlow. Therefore, it is inappropriate and inconsistent with HDC’s own evidence base and the NPPF, to plan for a level of growth where the lower range would fail to achieve a key objective 	4
<ul style="list-style-type: none"> • In light of the above, as a minimum HDC should be planning for 15,000+ homes over the plan period (Scenario D) as this scenario, according to the HFPS, has the prospect of assisting to deliver all objectives 	4
<ul style="list-style-type: none"> • Believe that HDC should plan to accommodate the full scale of growth identified in the ESFO and its evidence base, which will enable Harlow to achieve its full regeneration objectives, importantly including all of the key objectives and infrastructure requirements set out on Page 25 of the ESFO 	4
<ul style="list-style-type: none"> • The growth figures have no regard to the extent of regeneration that maybe be delivered and the need to change fundamentally the mix of dwelling types and tenures within the town 	4
<ul style="list-style-type: none"> • It is assumed in the ESFO that, having completed the Strategic Land Availability Assessment, Harlow has enough land to accommodate approximately 8,900 dwellings. However, consider that this over-states the potential availability and capacity of land 	4
<ul style="list-style-type: none"> • In many instances of the view that the role, function and nature of the proposed development at GPE has not been fully reflected. 	4
<ul style="list-style-type: none"> • The assessment process in the ESFO and its associated evidence base (in particular the Harlow Spatial Options Study) has not fully considered the benefits of a more concentrated approach having regard unique opportunity of the GPE site 	4
<ul style="list-style-type: none"> • That provision of 15,000 dwellings and 12,000 jobs, as set out in Option D of the development scenarios, is vital to achieve the Council’s vision, objectives and priorities in accordance with the Plan’s evidence base 	4
<ul style="list-style-type: none"> • Consider it vital that the plan makes provision for at least 15,000 dwellings between 2011 and 2031 as there is a very clear justification for this level of 	4

development in the Council’s evidence base. This justification, provided by the “Harlow Future Prospects” Study (NLP August 2013) provides compelling evidence for Option D of the defined development scenarios (i.e. 15,000 dwellings and 12,000 new jobs) as necessary to meet the Council’s vision and objectives

Question 2

COMMENTS REGARDING QUESTION 2 AND THE DEVELOPMENT EXAMPLES

Comment	Sub-Group
<ul style="list-style-type: none"> Examples 1, 2, 4 not viable without substantial infrastructure improvements, specifically roads and passenger transport as rural B-road does not have capacity to carry additional motor vehicles 	1
<ul style="list-style-type: none"> Preferred examples are 3 and 5 as they will be supported by appropriate infrastructure, specifically transport 	1
<ul style="list-style-type: none"> Harlow North one of best options 	1
<ul style="list-style-type: none"> Harlow North proposals fulfil a number of essentials not available to south-west of Harlow. The proposals are infrastructure heavy, with plans to include schools, medical facilities etc at the time of building houses, improve road crossings across the Stort, move the greenbelt, replace current farmland with more environmentally valuable woodland and press for a northern junction of the M11 	1
<ul style="list-style-type: none"> South-west Harlow has very poor public transport, with an infrequent, ill-advertised and unreliable bus service, meaning people use cars to travel to Epping tube station and increase congestion 	1
<ul style="list-style-type: none"> Own research (based on government data) shows that proposals for West Sumners are neither socially nor environmentally sustainable 	1
<ul style="list-style-type: none"> Assumption of 12,000 dwellings (increased from 7,500 to 8,000 to allow for social housing) reduces relevance of the examples 	1
<ul style="list-style-type: none"> Another town centred on station would increase commuting 	1
<ul style="list-style-type: none"> Rented affordable housing urgently needed for Harlow residents 	1
<ul style="list-style-type: none"> In favour of Examples 2 & 4 	2
<ul style="list-style-type: none"> Consider that there are many other opportunities for housing in more sustainable settings within the development boundary 	2
<ul style="list-style-type: none"> Do not support any of the five Examples. All areas of the town should accept some development. EFDC in its Issues & Options consultation made the point that the ‘local road network capacity’ is a constraint to development. The same document includes the ‘local sewage treatment works’ as a constraint 	3
<ul style="list-style-type: none"> Example 1 is best example only if integrated with access at several points to a more expensive than currently proposed M11/A414 link 	3
<ul style="list-style-type: none"> Example 1 is most appropriate example as it delivers growth and investment and potentially benefits areas with less regeneration benefits 	4

<ul style="list-style-type: none"> • Commend Examples 1,2 and 4 they secure – <ul style="list-style-type: none"> ○ Housing from land available with 97 Ha land available for development and open space. ○ By connectivity with Katherines and Pinnacles for regeneration, by investment and patronage of existing infrastructure. ○ Green space provision with ecological and landscape enhancement ○ Improve connectivity with existing public transport routes. 	4
<ul style="list-style-type: none"> • Supports Examples 2, 4 and 5 as they appear to identify East Harlow in its entirety for development. In doing so, these Examples come closest to delivering HDC's vision 	4
<ul style="list-style-type: none"> • Examples 3 and 5 have negligible regeneration potential 	4
<ul style="list-style-type: none"> • In particular East Harlow can assist the vision by: delivering sufficient new homes to help meet local needs; help to make the enterprise zones a success, by facilitating a new M11 junction and link road to improve access to them; retain and extend the network of green wedges in Harlow; maximise the use of public transport, including bus priority measures; and, facilitate new educational facilities towards the east of the town. East Harlow can also deliver directly or support the delivery of the Core Priorities. 	4
<ul style="list-style-type: none"> • Acknowledge the transport requirements of development here and indicate that expansion to the east could facilitate the implementation of J7a on the M11 by utilising some of the land. 	4
<ul style="list-style-type: none"> • Transportation analysis shows some existing headroom at J7 which will allow some development to be provided in the area. 	4
<ul style="list-style-type: none"> • Any significant Harlow development is likely to impact on the existing M11 junction (7) and East Harlow is no different to any other in that respect. However, it is becoming clear that the cost / benefit of improving Junction 7 is increasingly unattractive. The latest estimates from ECC indicate that the cost of meaningful improvements at Junction 7 (including a new flyover) could be approximately twice as expensive as creating a new Junction 7A 	4
<ul style="list-style-type: none"> • Of the 5 examples presented, two prioritise landscape quality over other objectives. Example 2 is wholly environmental/landscape led, whilst example 4 is stated to be 'regeneration and landscape led'. Whilst this indicates regeneration is still a priority, this example effectively prioritises landscape over regeneration given it moves away from the distribution of development outlined in example 1 which is focused wholly on regeneration 	4
<ul style="list-style-type: none"> • On this basis suggest that those scenarios which prioritise the landscape around Harlow (scenarios 2 and 4) will not those which are most likely to achieve Harlow's stated Vision and Core Priorities which are overwhelmingly focused on renewal and regeneration. 	4
<ul style="list-style-type: none"> • Consider that Option 3 – Passenger Transport Led, might be the most favourable option in terms of distributing growth within the Harlow area to deliver the core priorities within the consultation document, as focussing the largest concentration of development growth towards the north of Harlow (the Gilston Area) is considered the most sustainable option for residentially-led, mixed use development. 	4
<ul style="list-style-type: none"> • Consider that the five examples are not a relevant, appropriate or justified approach to the distribution of development and selection of sites as they do not encompass all of the plan's objectives. 	4
<ul style="list-style-type: none"> • Favoured spatial strategy is to focus development and identify sites that will 	4

<p>provide the best possible contribution to all the key objectives set out on page 20 of the consultation document, including delivery of Junction 7A and interim improvements to Junction 7 of the M11. Crucially, that strategy should include sites that can be delivered in the short term. This is the only sound approach as the objectives are interdependent.</p>	
<ul style="list-style-type: none"> Consider that Objective 4 “Economic Revitalisation” and Objective 10 “Supported Development and Change” (ensuring adequate infrastructure and service provision) are not properly addressed in the chosen examples. Suggest the inclusion of two further Examples as follows: “Economic growth and revitalisation led and “Transport Infrastructure and improved accessibility led” 	4
<ul style="list-style-type: none"> If, as confirmed by own analysis, land south of Harlow has an important role in the Council’s focus on regeneration areas (Example 1) and minimizes impact on the environment and landscape (Example 2), logic dictates that this land must be included in Example 4 that combines these two considerations. Consider the omission of land south of Harlow from Example 4 to be inconsistent with the evidence presented in Examples 1 and 2. Example 4 is therefore unsound as it stands because the exclusion of land south of Harlow is not justified by the evidence (as required by paragraph 182 of the NPPF). 	4
<ul style="list-style-type: none"> Support for Growth Strategy Examples 1, 2 or 4 and include illustrative broad outline of location, access, and green infrastructure 	4
<ul style="list-style-type: none"> If Harlow will have regained by 2031 its reputation as a place of aspiration, the spatial strategy should be based on scenario D described in the Future Prospects Study and the distribution of growth as suggested in example 1 of the Emerging Strategy 	4
<ul style="list-style-type: none"> The development options presented are in isolation from those presented by Epping Forest 	4
<ul style="list-style-type: none"> Chapters 6 to 10 focus on a narrow sample of development “Examples” that neglect key Council objectives, notably the need to show how options serve economic growth and revitalisation and can deliver essential transport infrastructure. This is not a sound approach to the Plan 	4
<ul style="list-style-type: none"> The distribution of development and choice of sites must be based on all the objectives and principles set out on page 20 of the document and not a limited number of themes 	4
<ul style="list-style-type: none"> Harlow’s Core Priorities do, at objective 6, make mention of protecting the town’s ‘distinctive character and heritage’, however this is in the context of ‘established quality streets and spaces’, rather than directly referring to preserving the landscape quality of the areas surrounding Harlow. However, in contrast five out of the 10 priorities listed refer to regeneration and renewal, with the remaining four referring to meeting housing needs, adapting to and mitigating the impacts of climate change and two objectives focused on delivering infrastructure. Similarly, the vision at page 18 does not include preserving the landscape quality of the surrounding countryside. 	4
<ul style="list-style-type: none"> Example 3 best but good links to public transport are required and it assumes the public would use them 	4

Question 3

COMMENTS REGARDING QUESTION 3

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Comment	Sub-Group
<ul style="list-style-type: none"> • New development areas must not detract from unique urban form of the town 	4
<ul style="list-style-type: none"> • New development should enhance existing public transport 	4
<ul style="list-style-type: none"> • Public transport and infrastructure improvements are needed to ensure sustainability of developments 	4
<ul style="list-style-type: none"> • Facilitating access to passenger transport facilities and supporting key infrastructure improvements are part of achieving successful regeneration, and as such a strict prioritisation is not possible. 	4
<ul style="list-style-type: none"> • All principles are significantly assisted; Regeneration (employment); landscape enhancements; CIL to support a northern bypass 	4
<ul style="list-style-type: none"> • Support the Core Priorities for Harlow, which are overwhelmingly focused on achieving regeneration and renewal, and as such suggest that maximising regeneration priorities should be the key principle 	4
<ul style="list-style-type: none"> • Development of West Sumners in accordance with Gibberd's expansion plans and would give critical mass to support regeneration 	4
<ul style="list-style-type: none"> • Option 3 – Passenger Transport Led most closely aligns with HC's regeneration objectives as it focuses growth to the north which is considered to be the most sustainable location for delivering strategic growth to meet local and regional needs 	4
<ul style="list-style-type: none"> • Believe it is wrong to rank these principles as they are interdependent and cannot be prioritized in this way. Have already expressed our concern that the five Examples set out in Question 2 do not address all of the Council's objectives and priorities. 	4
<ul style="list-style-type: none"> • Locating development where it maximises regeneration targets important issues of deep seated social and economic deprivation 	4

Question 4

COMMENTS REGARDING QUESTION 4

Comment	Sub-Group
<ul style="list-style-type: none"> • South Harlow should be last choice as it is in Green Belt 	1
<ul style="list-style-type: none"> • This example will intensify problems in the south of Harlow and destroy Green Belt land 	1
<ul style="list-style-type: none"> • West Sumners proposals would intensify transport congestion & pollution in south & west of Harlow 	1
<ul style="list-style-type: none"> • New roads and road improvements required – West Sumners development could put extra 2,000 cars on the roads in a rural area. Is this sustainable in terms of road use, pollution and congestion? 	1
<ul style="list-style-type: none"> • Large amounts of infrastructure required for this example, particularly to the road network 	1
<ul style="list-style-type: none"> • West Sumners is able to deliver the most direct range of regeneration benefits, including renewal of hatch, school and community facilities which would form the heart of a new neighbourhood, improving viability and bringing disposable income to area 	4

<ul style="list-style-type: none"> If planned as part of a comprehensive urban extension serves to establish the regeneration of both Pinnacles (employment) and Katherines (residential and neighbourhood hub) and offer substantial landscape enhancements. The difference between the examples invites a critical comparison between substantial extra growth to the north and south of Harlow, compared to growth to the north east. 	4
<ul style="list-style-type: none"> Consider development to the east would deliver some regeneration benefits which would justify the inclusion of land to the east within the “regeneration” options. 	4
<ul style="list-style-type: none"> Believe that in Harlow regeneration is more a matter of investment, particularly in the town centre, as well as changing the image and profile of the town. Regeneration is less about pure proximity and more about the ability to deliver quality sustainable neighbourhood, with strong links and investment commitments. 	4
<ul style="list-style-type: none"> Whilst example 1 offers the potential to achieve regeneration objectives, do not consider the link between quantum of growth and delivery of regeneration is guaranteed. 	4
<ul style="list-style-type: none"> Form of development at a site scale needs to ensure that the development is actively and effectively physically linked to Harlow in order to harness the regenerative benefits of growth 	4
<ul style="list-style-type: none"> Fully support a distribution of development and allocation of sites that includes land at South Harlow (at Latton Priory) for residential and employment development to achieve the key objectives of revitalizing the town, encouraging investment, creating additional jobs and regenerating areas of greatest need. 	4
<ul style="list-style-type: none"> Land to the south of Harlow, known as Latton Priory, is capable of accommodating circa 2,250 dwellings and 15 hectares of high quality employment, strategically located in relation to the highway network. Of all the sites put forward for development around Harlow, Latton Priory provides the closest relationship between growth and regeneration. 	4
<ul style="list-style-type: none"> Example 1 – EHDC do not appear to have included this in the their local Plan 	4

Question 5

COMMENTS REGARDING QUESTION 5

Comment	Sub-Group
<ul style="list-style-type: none"> South Harlow should be last choice as it is in Green Belt 	1
<ul style="list-style-type: none"> This example will intensify problems in the south of Harlow and destroy Green Belt land 	1
<ul style="list-style-type: none"> All developments on periphery of Harlow will cause loss of greenbelt 	1
<ul style="list-style-type: none"> West Sumners proposals would intensify transport congestion & pollution in south & west of Harlow 	1
<ul style="list-style-type: none"> New roads and road improvements required – West Sumners development could put extra 2,000 cars on the roads in a rural area. Is this sustainable in terms of road use, pollution and congestion? 	1
<ul style="list-style-type: none"> Large amounts of infrastructure required for this example, particularly to the road network 	1

<ul style="list-style-type: none"> • Object to Example 2 and specifically inclusion of playing field to the south of Gildden Way Site ref 22 <ul style="list-style-type: none"> ○ many people want this site removed ○ site performs role of Green Wedge between communities and will be more important when Gildden Way development goes ahead ○ it is an established, well-used community open space with informal and formal amenity, habitats and woodland, bringing considerable environmental and landscape benefits ○ including this as a less sensitive environmental area will be challenged ○ this site as a development location flies in the face of the vision the Council has to retain and reinforce the green wedge network 	1
<ul style="list-style-type: none"> • Agree with the proposed development to the north east of Harlow in the environmental/landscape led example, the plan should allocate some further adjoining land 	2
<ul style="list-style-type: none"> • West Sumners site has limited ecological value, no major archaeological constraints, little risk of flooding and limited landscape impact. It should be identified as a preferred location 	4
<ul style="list-style-type: none"> • Agree that the locations identified in Example 2 are likely to minimise environmental and landscape impacts. In particular, Example 2 appears to identify the whole of East Harlow for growth. The Panel that examined the East of England Plan (EEP) in 2005/06 concluded that East Harlow is “generally accepted to be the least constrained direction for growth”. This conclusion was based on a raft of technical work covering ecology, landscape character, the historic environment, noise and air quality. This technical work included the Harlow Area Landscape & Environmental Study and the Masterplanning which inter alia accepted that a large scale urban extension on land to the east of Harlow would have the least environmental impact of the options available. 	4
<ul style="list-style-type: none"> • If planned as part of a comprehensive urban extension serves to establish the regeneration of both Pinnacles (employment) and Katherines (residential and neighbourhood hub) and offer substantial landscape enhancements. The difference between the examples invites a critical comparison between substantial extra growth to the north and south of Harlow, compared to growth to the north east. 	4
<ul style="list-style-type: none"> • The landscape appraisal work forming the evidence base for the Harlow local plan preparation is comprehensive at a district scale but it does not provide the necessary level of detail to understand the impacts of proposals for development around the town on a site by site basis. Appraisal work undertaken by site promoters on the basis of agreed methodologies will provide a more detailed and nuanced understanding of the landscape impacts for each direction of growth. Many of the proposals being brought forward occupy only small parts of individual Landscape Character Areas and as such generalised conclusions about the impact of development based on whole Character Areas are not justified 	4
<ul style="list-style-type: none"> • Option 3 – Passenger Transport Led most closely aligns with HC’s regeneration objectives as it focuses growth to the north which is considered to be the most sustainable location for delivering strategic growth to meet local and regional needs 	4
<ul style="list-style-type: none"> • Support the inclusion of South Harlow within the environmental / landscape led example as being a site which benefits from natural visual containment as a result of the topography of the land and mature tree belts. The fact that 	4

development at Latton Priory is the option that will minimize environmental and landscape impacts is fully demonstrated by the landscape and visual study “A Vision for a Green Infrastructure Future” by our landscape consultants FPCR (2013).	
<ul style="list-style-type: none"> • Example 2 – A larger allocation to the west of Harlow could be provide the infrastructure needed to regenerate adjoining areas but also help mitigate any transport impacts 	4

Question 6

COMMENTS REGARDING QUESTION 6

Comment	Sub-Group
<ul style="list-style-type: none"> • Sensible if infrastructure (schools, medical facilities, water supply, public transport) is provided before building houses 	1
<ul style="list-style-type: none"> • Sensible solution with appropriate infrastructure (particularly road network enhancements) 	1
<ul style="list-style-type: none"> • Not if it means new bus lanes or keeping existing. Transport led implies people employed from outside the town. Congestion could be reduced by remodelling key building entrances 	2
<ul style="list-style-type: none"> • Agree with the proposed development to the north east of Harlow in the passenger transport led example, the plan should allocate some further adjoining land 	2
<ul style="list-style-type: none"> • Example 3 limits development to Harlow North which is unrealistic as current economic, regeneration and housing issues would not be addressed in the short-term. 	4
<ul style="list-style-type: none"> • In order for development to the north of Harlow to benefit from its proximity to the stations and the Town Centre transport hub there must be high quality linkages between the development and these destinations. 	4
<ul style="list-style-type: none"> • Northern part of East Harlow (i.e. north of Moor Hall Road) is actually geographically closer to a railway station (Harlow Mill) than parts of North Harlow, the general approach set out in Example 3 is considered to be unsound 	4
<ul style="list-style-type: none"> • Example 3 is predicated on locating development close to the rail stations and the town centre transport hubs. Consider this approach is sound in principle, however caution against assumption that proximity and accessibility are automatically correlated. 	4
<ul style="list-style-type: none"> • Existing public transport can be enhanced in locations such as West Sumners 	4
<ul style="list-style-type: none"> • Despite referring to “passenger transport”, this option appears to focus predominantly on rail transport and has little or no regard to buses and in particular existing and planned future bus priority corridors 	4
<ul style="list-style-type: none"> • East Harlow has at least as much potential, if not more, to encourage public transport uptake than other growth locations in or around Harlow. 	4
<ul style="list-style-type: none"> • Detailed consideration needs to be given to the form and boundaries of development at a site scale to ensure that high quality linkages are achievable in order that the benefits of that proximity can be harnessed. 	4
<ul style="list-style-type: none"> • Option 3 – Passenger Transport Led most closely aligns with HC’s regeneration objectives as it focuses growth to the north which is considered to be the most 	4

sustainable location for delivering strategic growth to meet local and regional needs	
<ul style="list-style-type: none"> Do not consider this example is appropriate as there is an over-reliance on land within East Herts District which would be unlikely to come forward in the plan period. East Herts is currently consulting on its Local Plan in which they consider it likely that only 3,000 new homes can be delivered in this location before 2031. 	4
<ul style="list-style-type: none"> Example 3 – EHDC has not sought to include this proposed growth. Growth is also heavily reliant on the delivery of a new junction on the M11 	4
<ul style="list-style-type: none"> An acknowledgement that an Option 3 – Passenger Transport Led, distribution of development could be an appropriate option for further consideration by HC and neighbouring Authorities 	4

Question 7

COMMENTS REGARDING QUESTION 7

Comment	Sub-Group
<ul style="list-style-type: none"> West Sumners proposals would intensify transport congestion & pollution in south & west of Harlow 	1
<ul style="list-style-type: none"> New roads and road improvements required – West Sumners development could put extra 2,000 cars on the roads in a rural area. Is this sustainable in terms of road use, pollution and congestion? 	1
<ul style="list-style-type: none"> Large amounts of infrastructure required, particularly to the road network 	1
<ul style="list-style-type: none"> This will intensify problems in the south of Harlow and destroy Green Belt land 	1
<ul style="list-style-type: none"> If planned as part of a comprehensive urban extension serves to establish the regeneration of both Pinnacles (employment) and Katherines (residential and neighbourhood hub) and offer substantial landscape enhancements. The difference between the examples invites a critical comparison between substantial extra growth to the north and south of Harlow, compared to growth to the north east. 	1
<ul style="list-style-type: none"> How can loss of playing field (area 22) be said to be less sensitive environmental area? 	1
<ul style="list-style-type: none"> Agree with the proposed development to the north east of Harlow in the regeneration and landscape led example, the plan should allocate some further adjoining land 	2
<ul style="list-style-type: none"> West Sumners site is able to provide a balance of regeneration and landscape objectives as it conforms with the Gibberd Masterplan, provides new facilities and locates development where the natural topography limits landscape impact 	4
<ul style="list-style-type: none"> Support Example 4 as an approach to accommodating growth principally because it identifies East Harlow in its entirety and to a lesser extent because it does not propose development on the two key landscape sensitivities around Harlow, namely the ridge of high ground to the south and the River Stort valley and its floodplain to the north. 	4
<ul style="list-style-type: none"> Given the Harlow Futures Study has established the principle that higher levels of growth can deliver better regeneration, a more detailed understanding of landscape issues on a site by site basis is required. This detailed evaluation will establish that it is possible to select a strategy which optimises the achievement 	4

of regeneration and renewal objectives through the delivery of high levels of growth within landscape constraints.	
<ul style="list-style-type: none"> The omission of South Harlow is curious since it was included within Example 1 “Focussed on Priority Regeneration Areas”, and Example 2 “Environmental / Landscape Led”. Logically, South Harlow must be included in Example 4 that combines these two themes. Under the landscape led option, paragraph 7.1 states that development is required in South-West Harlow if 15,000 homes are needed but is not clear why this location is favoured over South Harlow under this scenario. Land to the south is considered to be less sensitive than the land to the west and south-west in terms of the Green Belt conflict considerations. Furthermore, with regards to regenerative benefits, South Harlow is considered to be better located to deliver these benefits due to its proximity to the Priority Estates of Aylets Field, The Briars, Copshall Close, Barley Croft and Lower Meadow. 	4
<ul style="list-style-type: none"> Example 4 – Support this approach as it relies solely on EFDC rather than other uncooperative LPAs 	4

Question 8

COMMENTS REGARDING QUESTION 8

Comment	Sub-Group
<ul style="list-style-type: none"> Sensible if infrastructure (schools, medical facilities, water supply, public transport) is provided before building houses 	1
<ul style="list-style-type: none"> Sensible solution with appropriate infrastructure (particularly road network enhancements) 	1
<ul style="list-style-type: none"> At a cost to Gibber’s masterplan - do not want to lose heritage 	1
<ul style="list-style-type: none"> Another New Town is a better solution 	1
<ul style="list-style-type: none"> Agree with the proposed development to the north east of Harlow in the northern by pass led example, the plan should allocate some further adjoining land 	2
<ul style="list-style-type: none"> Support Example 5 in so far that it identifies the whole of East Harlow for strategic growth and would facilitate a new M11 Junction 7A and link road to the Gildea Way corridor. All of ECC’s preliminary new Junction 7A and link road options have been designed in such a way to be capable of linking into a possible new northern bypass, if that were to come forward at some point in the future. 	4
<ul style="list-style-type: none"> It is questionable whether a new northern bypass is likely to be delivered during the plan period. The cost of a bypass may be prohibitively high (representatives of ECC and HCC have suggested figures of £200m-£400m) and there is much uncertainty over land acquisition. Furthermore, it is unclear whether there is sufficient planning and political support for the scheme amongst the three district councils and two county councils, who each administer some of the land or act as the local highway authority. 	4
<ul style="list-style-type: none"> The technical and financial feasibility of the northern by-pass requires significant further work. Cost of the bypass could reduce the availability of funds to achieve regeneration and renewal objectives. Question whether, particularly in the context of East Herts stated intention to bring forward development in the Gilston area to serve their own development needs, a northern bypass is conducive to 	4

development situated to the north of Harlow meeting Harlow's Core Priorities and Vision	
<ul style="list-style-type: none"> The 2006 East of England Panel Report specifically highlighted (para 5.91) that a direct link from the M11 to development at Harlow North would increase the risks of this development having little relationship to Harlow and competing with rather than supporting the regeneration of the town. 	4
<ul style="list-style-type: none"> A northern bypass should not override other objectives but if it is seen as essential, it should be funded by a Greater Harlow CIL 	4
<ul style="list-style-type: none"> Northern Bypass example is focused on a specific single transport measure rather than the wider issue of improved transport infrastructure and accessibility. It does not therefore allow a rounded assessment of how various development sites and options could improve transport accessibility in its wider sense. The Northern Bypass led example is also likely to skew the results of the evaluation in favour of sites that might address this single transport solution. The inclusion of this example is not therefore, in our view, a sound approach to decisions on where development should be located. 	4
<ul style="list-style-type: none"> Example 5 – Heavily reliant on infrastructure delivery including J7a and a northern bypass. There are several constraints in terms of deliverability and the location of the link road is particularly constrained. It appears that this is not a robust or deliverable option as it relies on the cooperation of EHDC 	4

Question 9

COMMENTS REGARDING QUESTION 9

Comment	Sub-Group
<ul style="list-style-type: none"> Blend would be good as Gibberd concentrated on mixed development 	1
<ul style="list-style-type: none"> Too vague – depends on blend, but a blend is vital for social, demographic and economic reasons. 	1
<ul style="list-style-type: none"> It would depend on the blend 	1
<ul style="list-style-type: none"> A sustainable approach would be 15,000 new homes and 12,000 new jobs, sites which deliver regeneration and minimise environmental impacts and good public transport connections; including West Sumners site for up to 1,200 homes 	4
<ul style="list-style-type: none"> The preferred strategy for Harlow is heavily dependent on the outcome of joint working with East Herts and Epping Forest under the Duty to Cooperate. Detailed consideration is required to properly understand how growth which is proposed adjacent to Harlow to meet East Herts' and Epping's housing needs will be planned to ensure that it meets Harlow's vision and core priorities as set out in chapter 3 of the consultation document 	4
<ul style="list-style-type: none"> Consider a blend of development examples could be a better approach if that blend encompasses all the objectives and priorities set out on Page 20 of the consultation document. However, our favoured spatial strategy, as detailed in our response to Question 2, is to focus development and identify sites that will provide the best possible contribution to all the key objectives set out on page 20 of the consultation document, including delivery of Junction 7A and interim improvements to Junction 7 of the M11. 	4

Appendix 2: Other comments received (split by topic)

All other comments received – which did not directly relate to any of the questions – are reported in this appendix. The comments are split by topics as follows:

- AREAS AND SITES
 - North Harlow
 - South/West Harlow
 - East Harlow
 - Other Areas/Sites
- OPEN SPACES
 - Green Wedges
 - Green Belt
 - Other Open Space
- EMPLOYMENT
- INFRASTRUCTURE (GENERAL)
- INFRASTRUCTURE (TRANSPORT)
 - M11
 - Northern bypass
 - Other transport
- REGENERATION
- TOWN CENTRE
- OTHER ISSUES
- CONSULTATION PROCESS

Note that all comments (question-specific or otherwise) made by specific consultees, such as adjoining authorities, are reported in Appendix 3.

The table below, reproduced from Chapter 3, explains how the respondents were categorised into Sub-Groups.

Sub-Group	Type of Respondents
1: Harlow Residents and Resident/Community Groups	<ul style="list-style-type: none"> • Harlow Residents • Harlow Resident/Community Groups/Associations
2: Specific Consultees and Local Groups, Businesses & Organisations	<ul style="list-style-type: none"> • Adjacent Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Local Businesses • Local Groups and Organisations (including faith groups, disability groups, environmental groups and ethnic minority groups) • Partner Agencies • Other Groups/Organisations
3: Adjoining Parishes Residents and Other Residents	<ul style="list-style-type: none"> • Residents from East Hertfordshire DC area • Residents from Epping Forest DC area • Other Residents
4: Local Developers, normally via Planning Consultants/Agents	<ul style="list-style-type: none"> • Local Developers (responses normally submitted via Planning Consultants/Agents)

Areas and Sites

North Harlow

Table A1.1

Comment	Sub-Group
<ul style="list-style-type: none"> • Harlow North comes closest to demonstrating some infrastructure provision 	1
<ul style="list-style-type: none"> • Best option is to create additional new towns - Harlow North only option that comes closest to this approach 	1
<ul style="list-style-type: none"> • Developing the Gilden Way area further would kill the community, victimise existing residents and take away all that they hold dear 	2
<ul style="list-style-type: none"> • Infrastructure in Katherines and Gilston area not strong enough to sustain amount of building proposed 	2
<ul style="list-style-type: none"> • Do not think Harlow North is an option 	2
<ul style="list-style-type: none"> • Any development for 15,000 extra homes needs to be concentrated to the NORTH of Harlow and integrated with a A414/M11 link far better than junction 7a. 	3
<ul style="list-style-type: none"> • Development in Harlow North would cause enormous problems with infrastructure, relating to roads, schools, hospitals and public transport which are already overstretched 	3
<ul style="list-style-type: none"> • Development to the north of Harlow would be the better option. 	3
<ul style="list-style-type: none"> • Harlow seems keen to use land north of Harlow without considering the destruction of communities and the loss of open spaces which are used for recreational purposes including bird-watching, cycling and walking and which are promoted through the Stort Valley Corridor project, and the loss of wildlife habitats of various species including barn owls and rare birds 	3
<ul style="list-style-type: none"> • Object to designation of Gilston area for development – this would be an extravagant, undemocratic and unsustainable use of land, changing the area into a huge suburban mass which won't be part of Harlow due to the River Stort being in-between 	3
<ul style="list-style-type: none"> • Permission to extend Newhall and develop Gilden Way area, with existing and proposed transport links near railway stations and the Enterprise Zone, suggest that development to the north and east of Harlow are more practical options 	3
<ul style="list-style-type: none"> • Eastwick roundabout on the A414. Gridlocked most days (before the Harlow North properties have even been approved), Roydon suffers from East Herts residents 'rat running' to gain quicker access to their workplace. Where will the Harlow North traffic go? 	3
<ul style="list-style-type: none"> • Alternative to Harlow North is to use brownfield site of North Weald airfield 	3
<ul style="list-style-type: none"> • Key opportunities to secure development at Gilston in such a form that benefits the regeneration of Harlow are already being missed 	4
<ul style="list-style-type: none"> • High quality physical linkages can be delivered between development in the Gilston Area and Harlow - such linkages could determine whether development in the Gilston Area supports the town or turns its back on it 	4
<ul style="list-style-type: none"> • Currently, draft policies for the development proposed in the Gilston Area to meet East Herts' housing needs does not take into account Harlow's regeneration priorities as they fail to provide an opportunity for that development to achieve 	4

high quality linkages into Harlow which are considered would be a pre-requisite to ensuring that development at Gllston supports rather than undermines the regeneration of Harlow.

South/West Harlow

Table A1.2

Comment	Sub-Group
<ul style="list-style-type: none"> Worst options are Latton Priory, Katherines West and Sumners West – these would increase congestion on Southern Way and in Bush Fair, plus any traffic reaching the M11 from these would have to travel through Harlow and they are furthest from main public transport hubs 	1
<ul style="list-style-type: none"> Development of West Sumners would enlarge Harlow’s footprint 	1
<ul style="list-style-type: none"> Is West Sumners socially and economically sustainable? Will it exacerbate congestion on Southern Way and add to rush hour chaos? 	1
<ul style="list-style-type: none"> It does seem beyond comprehension that any new residents of Sumners would not be classed as Harlow residents but they would be swelling demand for Harlow services and infrastructure 	1
<ul style="list-style-type: none"> Preference against West Sumners and in favour of further housing and infrastructure to the north and east of Harlow 	1
<ul style="list-style-type: none"> Sumners community is against West Sumners development and in favour of development on brownfield sites and to the north of Harlow to supply the required housing and minimise disruption to the community, economy and environment 	1
<ul style="list-style-type: none"> Worst options are Latton Priory, Katherines West and Sumners West – these would increase congestion on Southern Way and in Bush Fair, plus any traffic reaching the M11 from these would have to travel through Harlow and they are furthest from main public transport hubs 	1
<ul style="list-style-type: none"> Crest Nicholson regeneration plans for Sumners Hatch – is it sustainable? Will it provide concurrent infrastructure improvements? Is it environmentally sound? Will it add to traffic congestion on Southern Way? Is it worth the loss of Green Belt and the additional infrastructure burden? More attractive shops will only be provided in the long-term. Some developers make promises of planning gain finance for regeneration, but regeneration of a specific hatch in return for carte blanche on house building is very short sighted 	1
<ul style="list-style-type: none"> Council-led regeneration of Sumners Hatch could consider housing needs of the elderly, school and medical facilities, disruption on Southern Way and environmental concerns. Why not bring in ‘not for profit’ developers who could look at the site? 	1
<ul style="list-style-type: none"> Sumners West is regarded as the prime area for expansion, as set out by Gibberd 	2
<ul style="list-style-type: none"> A small development at Sumners may be acceptable, dependent on the numbers 	3
<ul style="list-style-type: none"> Development at Katherines would be unacceptable. Both Sumners and Katherines are too far from the Town Centre and therefore would not support the facilities there. The area to the west of Katherines is an allocated glasshouse area 	3
<ul style="list-style-type: none"> Developments to the southwest would have many disadvantages – developments would be distanced from the town centre, commuting from this area would cause traffic congestion, local sewerage network is a restraint, there is a danger of 	3

coalescence with Harlow and Roydon, developments could encroach on historic landscapes and the Green Belt, and land west of Katherines is a glasshouse area	
<ul style="list-style-type: none"> Object to growth in Katherines and west of Sumners, due to poor transport links, overcrowded roads, distance to facilities. 	3
<ul style="list-style-type: none"> Sumners, is proposed for development, in Epping Forest DC area, what decisions regarding domestic waste, bus routes and, schools etc have been confirmed. Roydon village is used for parking for the station by Sumners residents 	3
<ul style="list-style-type: none"> Expansion to the west of Harlow is consistent with that proposed in the 1974 Masterplan which recognised the lower landscape value of this land 	4
<ul style="list-style-type: none"> Extension to west of Harlow between Water Lane, Epping Road, Old House lane, Flex Meadow and Kathrines can provide up to 1,100 homes and employment land particularly contributing to the achievement of the objectives underpinning Example 1 	4
<ul style="list-style-type: none"> Consider that Latton Priory must form part of the Plan's spatial strategy because it has been demonstrated that it will make a direct and immediate contribution to the key objectives 1 – 5 and 10.4 	4
<ul style="list-style-type: none"> Land south of Harlow at Latton Priory is best placed to deliver all the Council's objectives and has a vital role in delivering an early phase of housing, economic growth and regeneration alongside short term and longer term improvements to the strategic road network. 	4

East Harlow

Table A1.3

Comment	Sub-Group
<ul style="list-style-type: none"> A Harlow East option should be considered, with development to the east of the M11 with a new junction, a new branch line from the railway and new bus station which would allow businesses to be within easy reach of current Harlow residents 	1
<ul style="list-style-type: none"> East Harlow should be considered the catalyst for growth in and around Harlow. Through facilitating the delivery of a new M11 Junction 7A and link road to the Gilden Way corridor, East Harlow can kick start the regeneration of Harlow by easing congestion in the town, by improving the connectivity of the town's employment areas and the Enterprise Zone and by unlocking long term potential for strategic growth elsewhere in and around in the town (beyond a Phase 1 at East Harlow). 	4
<ul style="list-style-type: none"> Of crucial importance is to secure an allocation that will enable a viable development to come forward at East Harlow. 	4
<ul style="list-style-type: none"> It is vital not to frustrate or delay growth at East Harlow by insisting that a further site specific DPD or AAP is prepared, once the emerging Plan has been adopted. To the contrary, in order to allow East Harlow and the new M11 junction to unlock the long term potential for strategic growth in and around in the town, the emerging Plan should seek to identify site specific allocations (not broad locations) for growth at East Harlow. This could allow a planning application to be worked up in parallel with the emerging Local Plan process and allow a greater number of completions to be delivered on-site within the next five years. 	4
<ul style="list-style-type: none"> Would not object to a blend of the development examples, providing that East 	4

Harlow features in its entirety in whatever Preferred Option HDC decides to pursue.	
<ul style="list-style-type: none"> CIL may enable contributions to be collected from a wider pool of development sites, but it also may preclude funding from other sources (e.g. HCA loans) and would prevent delivering infrastructure directly on-site. Therefore, it may be preferable to zero rate certain strategic sites (including East Harlow) under any CIL schedule and pool contributions for the new M11 junction through s106 instead or itemise elements of the new Junction 7a and its associated package of improvements and carefully consider those elements best delivered by CIL and those by development. 	4

Other Areas/Sites

Table A1.4

Comment	Sub-Group
<ul style="list-style-type: none"> Land west of 93 – 100 Jocelyns – concern that playing field is included: it is only open space in neighbourhood, provides natural break between housing, is used by children and provides a safe environment. Loss of such a site would be against Gibberd’s vision of bringing countryside into the town 	1
<ul style="list-style-type: none"> New development in Comonside Road will be the first development with retail space directly by roadside in residential area if ground floor units are for retail. Thought needs to be given over whether this is to be duplicated elsewhere thereby eroding the town’s unique character 	1
<ul style="list-style-type: none"> Concerned by Crest Nicolson plans for Sumners Hatch – to allow development which would place huge burden on area’s limited infrastructure in return for some regeneration is foolhardy, plus infrastructure only considered at later phase 	1
<ul style="list-style-type: none"> Old Harlow set to suffer from soulless, under-supported housing estates and traffic 	1
<ul style="list-style-type: none"> Dashes Playing Field to be used for joint community and educational use 	2
<ul style="list-style-type: none"> Look more closely at existing opportunities, even if sites are identified for other uses. Example of one such opportunity at Junction Parkway/Roydon Rd. 	2
<ul style="list-style-type: none"> Making use of sites such as Junction Parkway/Roydon Road would assist the council greatly in addressing their required development needs 	2
<ul style="list-style-type: none"> Terminus House car park retained for public and college use 	2
<ul style="list-style-type: none"> The College has contributed to the regeneration of Harlow through relinquishing significant parts of its campus for the development of University College. This restricts future options for the college to develop its estate. Proposed therefore: Vacant garage blocks adjacent to College used for College Parking to allow expansion 	2
<ul style="list-style-type: none"> The council should be putting more emphasis on sites such as the land at Junction Parkway/Roydon Road 	2
<ul style="list-style-type: none"> Support inclusion of Ram Gorse playing field as a housing development site 	4

Open Spaces

Green Wedges

Table A1.5

Comment	Sub-Group
<ul style="list-style-type: none"> • Must keep green wedges 	1
<ul style="list-style-type: none"> • No more incursion into Green Wedges as a number of them have been eroded already 	1
<ul style="list-style-type: none"> • Existing Green Wedges are inviolate. Green Wedges should be incorporated in expansion areas in the same proportions as now 	2
<ul style="list-style-type: none"> • Green Wedges should not be built on as they are the lungs of the town 	2
<ul style="list-style-type: none"> • Agree that the 'principle' of Green Wedges should be retained 	4
<ul style="list-style-type: none"> • Do not agree that the viability of the land as farmland should need to be demonstrated, if the proposed use is compatible with Green Wedge (i.e. sports and recreation), as this restrictive policy could lead to the Green Wedge unable to provide the "multifunctional opportunities for residents and wildlife" set out in Vision 7 of the Vision for Harlow, and could mean that the vitality of the Green Wedge is eroded through over-restrictive policy constraints 	4

Green Belt

Table A1.6

Comment	Sub-Group
<ul style="list-style-type: none"> • Object to use of Green Belt land for development and creeping development which encircles the town and threatens quality of life 	1
<ul style="list-style-type: none"> • Allowing sites to absorb residential development will reduce the council's need to allow development in the Green Belt and also to require other authorities to accommodate their housing needs. 	2
<ul style="list-style-type: none"> • More sustainable to develop a site within the established urban area and provide local facilities for residents as opposed to relying on greenfield sites located within the green belt 	2
<ul style="list-style-type: none"> • Harlow's 'grandiose' growth claim sadly includes the inclusion/use of the Green Belt 	3
<ul style="list-style-type: none"> • Creeping coalescence between Roydon and Harlow must be avoided. Two Planning Inspectors' Reports relating to land at East End have supported this. EFDC have been clear from the outset that all green belt land must be maintained as so 	3
<ul style="list-style-type: none"> • Cooperation should include a comprehensive review of the Green Belt in Epping Forest District to ensure the needs of both districts are met 	4
<ul style="list-style-type: none"> • Green Belt boundaries must be capable of enduring beyond the plan so the Council should aim for the upper (15,000 dwelling) growth level 	4
<ul style="list-style-type: none"> • Harlow will need to work with adjoining authorities on a joint Green Belt review 	4
<ul style="list-style-type: none"> • Scenario C - Jobs led might involve loss of Green Belt which is concerning 	4

Other Open Space

Table A1.7

Comment	Sub-Group
<ul style="list-style-type: none"> • Erosion of Old Harlow & Churchgate St green spaces and rainwater soakaways 	1

exacerbates flooding	
<ul style="list-style-type: none"> • First class farmland should not be developed – instead use land that is unproductive 	1
<ul style="list-style-type: none"> • Harlow’s green verges are suffering from ‘cutting edge design’ where new developments are being built virtually next to the roadside 	1
<ul style="list-style-type: none"> • Substantial development on flood plains has resulted in flooding. Further development will exacerbate flooding 	1
<ul style="list-style-type: none"> • SUDS have been proved to be a nonsense by experience of New Hall & Church Langley SUDS which has flooded Old Harlow & Churchgate St 	1
<ul style="list-style-type: none"> • Harlow has a distinct character with buildings away from the road giving it a green and open feel 	1
<ul style="list-style-type: none"> • Building on playing fields is fundamentally wrong as it removes children’s rights to have a safe area for meeting, sports, exploring and playing 	2
<ul style="list-style-type: none"> • Natural environment must be enhanced not destroyed 	2
<ul style="list-style-type: none"> • Brownfield sites need to be considered and developed – and not greenfield sites, especially due to development planned at Gilden Way 	2
<ul style="list-style-type: none"> • New housing areas should come from old brownfield sites 	2
<ul style="list-style-type: none"> • Plans should recognise need to build on many of its own open spaces and brownfield sites whilst retaining green areas 	3
<ul style="list-style-type: none"> • Trust diminishes as green space is identified for development 	3
<ul style="list-style-type: none"> • Appropriate amounts of recreation and sporting space must be provided for both current and future residents 	4

Employment

Table A1.8

Comment	Sub-Group
<ul style="list-style-type: none"> • No business plan is provided and there is no discussion of the financial cost and benefits of the proposals, including the levels of increased employment 	1
<ul style="list-style-type: none"> • Employers are attracted to those places with good transport links 	1
<ul style="list-style-type: none"> • Question whether more housing is needed. More jobs locally is what is really needed 	1
<ul style="list-style-type: none"> • Many original residents have left because the jobs solutions have become dire 	1
<ul style="list-style-type: none"> • NPPF effectively advises against local authorities retaining old employment sites if there is little prospect of them being brought forward for development 	2
<ul style="list-style-type: none"> • Appear to be more of a need for housing land than employment land over the plan period 	2
<ul style="list-style-type: none"> • Poor accessibility is a major inhibiting factor for the existing major employment sites and successful businesses have indicated their intention to move from Harlow rather than expand within the town 	2
<ul style="list-style-type: none"> • Leaflet suggests at least 3,000 houses will home jobless people or commuters 	3

Infrastructure (General)

Table A1.9

Comment	Sub-Group
• Better to offer solutions that prioritise infrastructure	1
• Infrastructure is important	1
• Why would a doughnutting approach be valid when the road structure does not cope and medical facilities are at capacity?	
• It is not housing that will prevent decline – it is correct investment in infrastructure which will allow additional housing	1
• Lack of infrastructure could result in Harlow becoming an ‘overspill’ for other towns	1
• Little mention of infrastructure, e.g. schooling, road upgrades, sewerage, drainage, water supply pressure, hospital	1
• Much more information needed on schools, health care, drainage/sewerage	1
• No evidence of water supply, sewerage or hospital infrastructure – existing facilities will struggle to cope with developments in other authorities pushing against Harlow’s boundaries	1
• Already difficult to get appointment at GP surgery	2
• How will other services such as schools, social care and policing cope?	2
• Utmost care must be taken in the provision of additional infrastructure and services	2
• Will hospital be able to cope?	2
• Should first protect and enhance existing infrastructure before building new. Advise district-wide policy for this purpose to reflect NPPF to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities.	2
• Infrastructure not strong enough to sustain amount of building proposed	2
• Should set out strategic priorities in the Plan including provision of health, security, community and cultural infrastructure and other local facilities.	2
• Concerned about the ability of infrastructure to cope.	3
• Costs of new infrastructure would presumably have to be borne by the developer rather than the taxpayer?	3
• Primary concern for the next few years is the quality of secondary education our children can receive from the town	3
• Provide infrastructure such as roads, schools, medical facilities, water supply, and sewage before building new properties	3
• An infrastructure delivery plan should be published in the early stages of the consultation process. It should specify when and how the work will be delivered and how it will be funded	4
• The Council needs to clarify whether it intends to implement infrastructure improvements in parallel to development or prior to development	4
• Emphasize the importance of the Council’s Objective 10 which is to support development and change through the provision of adequate infrastructure.	4

Infrastructure (Transport)

M11

Table A1.10

Comment	Sub-Group
• Junction 7a would be a disaster as it would increase Harlow congestion	1
• M11 Junction 7A is needed, but only to provide a northern bypass to the town, no link to Gilden Way. Northern bypass is vital if north Harlow developed	2
• Not happy with proposed Junction 7A proposals to lead traffic through Old Harlow	2
• Do not support Junction 7a proposal as it will not reduce existing traffic and congestion. Take road link nearer to Pishiobury & Sawbridgeworth and remove need to go through Harlow to get to M11	3
• M11 junction 7a proposal not part of this consultation	3

Northern bypass

Table A1.11

Comment	Sub-Group
• It makes no sense to link M11 to Harlow via Gilden Way now that major development north of Harlow is a possibility	1
• Northern bypass essential	1
• Northern bypass only possible solution to avoid congestion	1
• Support plans for a northern bypass to connect to M11 – ECC and HCC should deliver joint infrastructure programme to solve congestion on the border	1
• Without a northern bypass, the proposals will choke Harlow with traffic congestion and have a highly detrimental effect, particularly on Old Harlow	1
• Little consideration for infrastructure and transport in some examples – issue with link road going through Old Harlow/Edinburgh Way is increased congestion. Lack of improved road network would make Harlow a less attractive place for businesses (inc. those in the scientific sector), retailers and shoppers, and increase pollution	1
• Proposals will generate unsustainable traffic congestion and improvements will not provide relief, instead replicating major problems around the hamburger roundabout	1
• There will be lots of new residents and traffic with new development but Harlow has virtually no dual carriageways.	1
• Tinkering with transport system as now will not work, building new houses exacerbates traffic and parking congestion	1
• While bus lanes sit empty most of the time, traffic queues beside them	1
• Harlow's congested road network and diminishing public transport network is inhibiting the travel of students	2
• Roads are under strain and major enhancement may not be the solution. Consideration should be given to alternative modes of travel. Through traffic should have an alternative route than now	2
• Town currently gridlocked during rush hour	2
• Bus service in Harlow is of the lowest standard which only serves to keep residents in their cars. Growth will come with more congestion if this is not addressed	3
• Concentrate on developing a high quality, frequent and reliable bus system the	3

town can meet its aspirations without increasing the strain on the local road network	
<ul style="list-style-type: none"> Document seems to focus primarily on improvements to the Highway network without thought to providing a higher quality bus service 	3

Other Transport

Table A1.12

Comment	Sub-Group
<ul style="list-style-type: none"> Many original residents have left because transport solutions have become dire 	1
<ul style="list-style-type: none"> More car parking for Staple Type shopping centre is required in light of recent and future developments in that area 	1
<ul style="list-style-type: none"> Where will investment come from for new roads linking new developments? 	1
<ul style="list-style-type: none"> Where will open spaces be allocated for park'n'ride if they have been built on? 	1
<ul style="list-style-type: none"> Document glosses over infrastructure and transport 	3
<ul style="list-style-type: none"> Concurs with ECC's view that a more northerly bypass of Harlow would "not address congestion within the town... or provide for the growth and regeneration of the town" (ECC option consultation) 	4
<ul style="list-style-type: none"> ECC has concluded that, following completion of the Test 5 modelling, there are no transport show stoppers to 10,000 residential units along with employment for 2,500 people proceeding at GPE. Accordingly, HDC can have comfort that the conclusions reached by the authorities and in particular ECC, are robust and that transport considerations do not preclude development a GPE of up to 10,000 homes 	4
<ul style="list-style-type: none"> The provision of Junction 7A is the single most important action necessary under Objective 10 and the key part of a strategy to improve access to the motorway and strategic road network. 	4

Regeneration

Table A1.13

Comment	Sub-Group
<ul style="list-style-type: none"> Better to offer solutions that prioritise regeneration 	1
<ul style="list-style-type: none"> None of the examples are ambitious enough to stimulate sufficient regeneration 	1
<ul style="list-style-type: none"> Previous expansions have promised increased employment, improved town centre and quality of life, attraction of businesses and regeneration. However, recent expansion has had the reverse impact 	1
<ul style="list-style-type: none"> Regeneration of existing residential areas to provide improved housing stock, and to increase density where possible, is to be encouraged. 	2
<ul style="list-style-type: none"> Wholesale regeneration initiative required to deliver housing, business and jobs 	2
<ul style="list-style-type: none"> Document glosses over regeneration 	3
<ul style="list-style-type: none"> Regeneration should include redevelopment of existing housing and better quality development to attract the young and aspiring 	3
<ul style="list-style-type: none"> Agrees with the conclusions of the Harlow Future Prospects Study and with paragraph Emerging Strategy that evidence shows that additional development will be required to deliver long term regeneration of Harlow 	4

• Clear link between growth and regeneration	4
• The regeneration of the existing urban area is not simply achieved by facilitating development on nearby sites – it is perfectly possible for new development to leave deprived areas untouched even when it is very close by	4

Town Centre

Table A1.14

Comment	Sub-Group
• Town centre needs to be made more attractive as certain areas are a disgrace	1
• Need to focus on regenerating town centre to support the local economy and ensure Harlow is a sub-regional centre for leisure and entertainment	1
• Ensure town centre remains the centre by building around Harlow and not just to the east – this will also reduce traffic congestion by allowing more walking and cycling	1
• Concern with the impact of the potential closing of anchor stores in the town centre	2
• Town centre can be a great place again through investment in new stores	2
• The town centre and neighbourhood shopping and commercial centres must form an important part of the town's regeneration. Have great potential, as retail and commercial hubs, and could provide residential use without losing their individuality, but developed in a way that preserves their character	2
• Gradual erosion of the town centre offer and its physical environment has been identified, which has resulted in a declining role for employment and other opportunities for our students	2

Other Issues

Table A1.15

Comment	Sub-Group
• Affordable, social and small housing units are important in a growing town	1
• Has the Council explored all options of redeveloping brownfield sites? Smaller size starter homes could be focused on smaller brownfield sites	1
• Consider increasing housing density	1
• Have all empty properties been used?	1
• The south of England should not be carpeted with unaffordable executive homes – instead New Towns should be built with rented accommodation	1
• Officers should live in the town	1
• Residents had to work in the town before they were housed so traffic was manageable	1
• The role of Harlow could not be transformed into current day Cambridge as Harlow is not part of the key science area known as the “golden triangle”	1
• What happens if there is a change of government with different policies?	1
• New developments are not in keeping with surrounding areas and are more suited to inner city/town centre styling, and some areas have been over-	1

developed	
<ul style="list-style-type: none"> • New developments should have included in their costs a figure of compensation to be paid for loss of value for affected communities 	1
<ul style="list-style-type: none"> • Preservation of communities and adherence to Gibberd masterplan are important 	1
<ul style="list-style-type: none"> • Good quality architecture is to be aimed for 	1
<ul style="list-style-type: none"> • Supports Harlow Council to realise the towns potential 	2
<ul style="list-style-type: none"> • There is a growing need for extra sites to cover D1 (Community) Use - Especially D1-h class sites. This vital provision for the wellbeing, reduction in crime, and spirituality of the population is being eroded rapidly rather than expanded and if future planning is to be considered sound, considering population and housing expansion, this trend has to be reversed and extra space made available for the residents of Harlow and around to have the required quality of life. 	2
<ul style="list-style-type: none"> • Any land developed to meet growth outside Harlow should be subject to compulsory boundary change 	2
<ul style="list-style-type: none"> • Principles of the Gibberd Plan must form the basis for any expansion 	2
<ul style="list-style-type: none"> • Development should be in-keeping with existing development 	2
<ul style="list-style-type: none"> • Harlow has a great record for using old properties for other uses 	2
<ul style="list-style-type: none"> • Consider that more development could be achieved within Harlow's established administrative and urban area 	2
<ul style="list-style-type: none"> • Encourage Harlow Council to extend program of building council houses for rent 	2
<ul style="list-style-type: none"> • Ensure that established facilities and services are retained and able to develop for the benefit of the community. This guidance is contained in the Sustainability Appraisal but not in the Emerging Strategy. 	2
<ul style="list-style-type: none"> • Every urban area needs to have symmetry between its housing supply, employment opportunities and leisure facilities. Future planning applications for your social infrastructure will require criteria for their assessment and none are offered in this document. 	2
<ul style="list-style-type: none"> • There is no guidance in the document as how the community will be able to take advantage of Harlow's excellent sporting, leisure and cultural facilities. There is no mention of this aspiration in the Objectives listed on page 20. 	2
<ul style="list-style-type: none"> • NPPF states economic development can be supported by a communities', health, social and cultural well-being. Consequently provision of community infrastructure for tourism (cultural heritage) and town centre vitality (cultural facilities) etc., are vital for their contribution to residents' and visitors' life satisfaction. 	2
<ul style="list-style-type: none"> • Locals feel the town has changed from the original ideas prepared by Gibberd. A few thousand houses are not going to change the town into what the Planners want. Harlow has little land of its own to use for development and is relying on neighbouring authorities to provide land for development, to the detriment of villages on the outskirts of Harlow 	3
<ul style="list-style-type: none"> • Harlow Council should be prepared to take a robust approach with adjoining authorities on the Duty to Cooperate 	4
<ul style="list-style-type: none"> • Harlow must work with Epping Forest District under the Duty to Cooperate as this is a statutory obligation and seek the allocation of development sites beyond the boundary of its administrative area 	4
<ul style="list-style-type: none"> • Supportive of Part 2 of the Vision, which is supported by para. 47 of the NPPF 	4
<ul style="list-style-type: none"> • Do not believe EHDC and HDC have, at present, discharged their duty to co-operate fully and effectively. The evidence base shows that there is a genuine 	4

and immediate need in East Hertfordshire that is best met north of Harlow.

Consultation Process

Table A1.16

Comment	Sub-Group
• Consultation document difficult to follow and leaflet poorly presented	1
• Consultation needs to be subject to a local referendum	1
• Consultation period needs extending	1
• Councillors and officers should have held public meetings for the public to learn and question the proposals	1
• Fear being misrepresented or misinterpreted in answering the questions	1
• If the council asks the wrong questions it will get useless answers or silence	1
• Insufficient, overly complex and inaccessible information	1
• Results of previous consultation should have been included	1
• The consultation fails to meet best practices for consultations, burdening the public with a mass of incomprehension and jargon, making the consultation inaccessible to the majority of Harlow and giving the impression of a Council not wanting to consult	1
• The website for responding is complex and user-unfriendly	1
• Time consuming and challenging to provide feedback due to comprehensiveness of document and complexity/awkwardness of website	1
• Wider debate needed with Harlow's residents	1
• Document gives little information on the views of Epping and East Herts. Councils	3

Petition submitted by STOP Harlow North

- 5.9. A petition was sent to East Herts Council by the STOP Harlow North campaign group in response to the consultation on the East Herts District Plan Preferred Options consultation.
- 5.10. A total of 1,846 people – mostly residents of East Hertfordshire – signed the petition and stated their agreement with STOP Harlow North’s statements that development to the north of Harlow (in the Gilston area) would be unsustainable and not financially viable due to a lack of supporting infrastructure, and that the creation of Gilston Great Park is a preferred alternative.
- 5.11. A number of comments regarding cross-boundary issues were identified by comments in the petition. The main issues raised are as follows, split by topic area:

Environmental

- Exacerbation of flooding caused by development
- Light pollution arising from new development
- Green spaces in Harlow should be used for development
- Good agricultural land would be lost
- Brownfield land should be used for development and not greenfield land
- The countryside is used for recreational purposes including walking, as well as educational purposes, and needs to be preserved for wildlife habitats and future generations to enjoy
- The traditional, rural character of surrounding villages would be lost
- Urban sprawl needs to be prevented by keeping Green Belt land in place

Infrastructure

- General infrastructure would not cope
- There are not enough primary and secondary school places
- There would not be enough capacity at local hospitals and surgeries
- The electricity supplies would not cope and powercuts could increase
- Water supplies would not be sufficient and this area is already one of the driest in the country
- Issues regarding public transport provision, and road congestion and parking issues arising from the effects of development in this area
- Communications infrastructure would not cope
- Police and fire services would be placed under too much strain
- The drainage and sewerage systems are not sufficient to cope
- Current leisure facilities would be insufficient

Other issues

- Harlow should be regenerated instead of building in this area
- Harlow has suffered from past expansions / Harlow would not benefit from the proposed development
- These proposals would not alleviate affordable housing need
- Noise and pollution would increase
- There are not enough jobs for the levels of growth proposed

- There are already too many housing expansions taking place
- Such development would encourage commuting
- Crime rates would increase
- Empty properties should be used before building on greenfield land
- The proposed development would add to the overspill from London
- Land further north or west should be developed
- People should be moved elsewhere in the country such as the north / New Towns elsewhere should be built
- It is better to have smaller, dispersed settlements / expansions

Appendix 3: Summaries of Representations from Specific Consultees

All comments (question-specific or otherwise) made by specific consultees are reported in this appendix.

The comments are split by specific consultees (and where appropriate, split further into topic areas and/or questions):

- ESSEX COUNTY COUNCIL
 - Transport & Highways
 - Education
 - Historic & Natural Environment
 - Minerals & Waste
 - Other
- HERTFORDSHIRE COUNTY COUNCIL
 - Public transport
 - Roads
 - Ecology
 - Other
- EAST HERTFORDSHIRE DISTRICT COUNCIL
 - General
 - Questions 1 - 9
- EPPING FOREST DISTRICT COUNCIL
- EASTWICK & GILSTON PARISH COUNCIL
- HUNSDON PARISH COUNCIL AND EASTWICK & GILSTON PARISH COUNCIL (consultant report)
- HIGHWAYS AGENCY
 - General
 - M11 Junctions
 - Modelling, Mitigation & Impacts
- ENVIRONMENT AGENCY
- PRINCESS ALEXANDRA HOSPITAL NHS TRUST
- WEST ESSEX CCG & NHS ENGLAND
- NATURAL ENGLAND
- ENGLISH HERITAGE
 - General
 - Specific Areas/Sites
- THAMES WATER

Essex County Council

Transport & Highways

- The County Council recommends that Harlow Council considers the Essex EGS and priorities in the Essex Transport Strategy when preparing the emerging Plan spatial policies.

- Highways and Transportation – Ensure that the growth and development proposed by Harlow Council reflect the spatial options that have been used for the County Council Highways Modelling work. The County Council also welcomes further detail regarding the nature of sustainable transportation planned for new developments.
- The 5 growth scenarios set out in the Harlow Plan reflect some of the highways modelling test previously undertaken. However, there are variations in the scenarios set out in the Harlow Plan and those scenarios that have been tested it will be necessary to undertake additional detailed tests to reflect the revised locations and numbers. Essex County Council welcomes working with Harlow Council to undertake these additional tests and enable the County Council to provide a comprehensive response on the impacts of each example.
- The County Council questions the viability of growth at Harlow north below 5,000 as there maybe issues in respect of delivery of necessary highway infrastructure. With levels below this further transport modelling would be required to ensure that development issues associated with growth below 5,000 consider wider transportation issues.
- Development scenario example 5 incorporates 10,000 dwellings within north of the town, and Harlow Council refer to this option as ‘Northern Bypass Led’. The County Council considers that referring to the growth option as ‘Northern Bypass Led’ is misleading to the local community within Essex. The transport modelling to date has shown that traffic can be catered for it within the existing Harlow network providing the M11 J7a is delivered and accounts for other network upgrades. The estimated cost of the northern bypass is between £300 - £400m and is unlikely to be deliverable at the level of growth proposed; furthermore it would require the link to Gilden Way. The reference therefore is misleading and raises local community transportation expectations that are extremely unlikely at this stage.
- Harlow Council should seek to ensure that the Essex Transport Strategy West Essex priorities are appropriately referred to within the Local Plan.
- The NPPF also aims to ensure that strategic infrastructure needs are considered. It is therefore recommended that Harlow Council considers the role and impact relationship that London Stansted Airport may play from a transportation and economic perspective.
- ECC recommends that the Harlow Plan provides specific details on the type of sustainable transportation measures to be delivered

Education

- Education – Primary and Secondary – The County Council considers that each of the five development scenarios is likely to require the provision of additional primary and secondary school places. This may be achieved by a combination of the expansion of existing schools within the existing built up area, where site capacities permit, and the establishment of new schools where the scale of development would require the provision of significant numbers of additional places and there is little scope for the expansion of existing provision within reasonable travelling distance of the new developments.
- Harlow District Council’s officers have recently been provided with a detailed analysis of the education requirements, which would be needed to meet the social infrastructure requirements to ensure any new development is sustainable, for a

variety of growth scenarios. This identified those areas where growth might be accommodated by the expansion of existing schools and those areas where there is likely to be a requirement for the establishment of new schools. It is important to note that this information can be updated by the County Council when Harlow Council revises the options and agrees the preferred option through the local development plan process.

- The County Council wishes to be involved in any joint plan prepared with adjoining authorities.
- ECC has an expectation that, where there is an increase in demand for school places that is attributable to new housing development which cannot be met within existing permanent capacity, the additional provision should be funded via developer contributions (section 106 or CIL). ECC's approach towards mitigating the impact of development on schools and early years and childcare is set out in the "Education Contribution Guidelines Supplement to the "Essex County Council's Developers' Guide to Infrastructure Contributions".
- Early Years and Child Care - Within Harlow current evidence indicates that the following wards are either full or very close to full capacity (Bush fair, Mark Hall, Netteswell, Old Harlow and Toddbrook). Provision will also be required in Old Harlow.
- The following areas have some (limited capacity) - Church Langley, Sumners and Kingsmoor, Little Parndon and Hare Street, Harlow Common and Staple Tye.
- Changes to Government policy mean that there will be an increase in demand for such facilities which will need to be recognised, and met, in the emerging Local Plan.

Historic & Natural Environment

- Natural Environment – Ensure that reference is given to Essex Wildlife Trust's Living Landscapes and designated and other priority habitats are protected and enhanced where possible. Policy wording is also supplied in Appendix 1.
- Evidence from Living Landscapes suggests that development between Harlow Wood SSSI and Latton Common Local Wildlife Site (within the Parndon Woods Living Landscapes) could potentially create a barrier between these ancient woodlands, potentially resulting in habitat fragmentation, pollution and increased usage.
- Historic Environment – Ensure that consideration is given to the Historic Environment Record.
- The County Council considers that all of the proposed strategies and development areas identified in Chapters 6, 7, 8, 9 and 10 and Appendix 1 have potential to impact on the historic environment of Harlow District to a greater or lesser degree. There is no reference within the Harlow Plan to the Historic Environment as a constraint, despite the presence of a range of designated and undesignated assets within the District and the identification of the Historic Environment as a factor within the Sustainable Appraisal for Harlow

Minerals & Waste

- Minerals and Waste – The County Council recommends that Harlow aims to ensure that emerging policy is consistent with the County Council's Minerals and Waste

Plans. We welcome further discussions with Harlow to assist the Local Planning Authority in progressing to the next stage of plan preparation.

- ECC recommends that the Essex Minerals Local Plan and the Essex and Southend Waste Local Plan form a part of the overall Local Development Plan in Harlow. Both of the respective plans should be included within the figure accompanying paragraph 1.2. It is recommended that the Local Plan clearly acknowledges that in seeking to develop future spatial policies for Harlow consideration is given to the Minerals Local Plan and the Waste Local Plan.
- ECC recommend reference to ‘sui generis’ uses of an employment nature at these designated employment areas where this is considered suitable. This ensures there is sufficient provision of land for waste facilities necessary for waste arising within Harlow.
- It is important for Harlow Council to note that the NPPF requires Mineral Safeguarding Areas (MSAs) to be defined in Local Plans so that known locations of specific minerals are not needlessly sterilised by other forms of development, whilst not creating a presumption that the defined resources will ever be worked.
- It is also necessary to safeguard existing mineral workings and Preferred Sites to prevent the possibility of new incompatible neighbours being established and ultimately restricting extraction activities. Mineral Consultation Areas (MCAs) apply to the safeguarded site itself and extend for a distance of 250 metres outwards from the site boundary of each of these safeguarded sites.

Other

- Libraries – The proposed growth will require the provision of new library facilities.
- Climate Change – Welcomes that the consultation document includes a strategic objective referring to “adapting and mitigating the impacts of climate change”. However it is acknowledged that the remainder of the text set out within the consultation document makes no further to how Harlow plans to address the issues of climate change or promote sustainable development. It is recommended that consideration be given to how Harlow Council will seek to address climate change and sustainability.
- Locational Specific Comments – The County Council consider that there are some inconsistencies within the Harlow Plan that require further attention.
- ECC consider that Example 2 ‘Environmental/ landscape –led’ fails to meet objective 7 (page 20) entitled ‘Revitalised Green Spaces’ as it makes no reference to how Harlow Council will deliver a revitalised network of multifunctional green spaces that are fully integrated into the built environment, meeting the needs of the community and providing ecological opportunities. The County Council welcomes working with Harlow in seeking to ensure that future growth and development minimises impact on the environment and landscape. Furthermore the County Council also welcomes appropriate green belt assessment and review as an integral component of the plan preparation process.
- The County Council also considers that Example 2 is not consistent with strategic objective 8 (page 20 of the Harlow Plan) entitled ‘Adapt to and mitigate the impacts of climate change’. ECC support the statement set out in Issues and Challenges section within page 19 of the Harlow Plan whereby it indicates that further studies are required on the impacts of climate change. ECC’s views in section 2 highlight that further information is required regarding how Harlow plans to address the

issues of climate change or promote sustainable development, including more details on renewables and low carbon energy, design and use of natural resources.

- Strategic Environmental Assessment – The County Council has supplied general views regarding the Sustainability Report that accompanies the Harlow Plan.
- The County Council notes that the SA Report ranks each alternative against sustainability criteria, overall the order of most favourable sites (assuming all sustainability criteria are weighted equally) is 1a, 3a, 1b, 3b, 2a, 4a, 4b, 2b and finally 5. It is also noted that all the alternatives appraised have positives and negatives against the sustainability criteria, therefore mitigation for negatives will need to be considered for the spatial option selected.

Hertfordshire County Council

Public transport

- In terms of sustainable transport issues the core strategy appears to be somewhat deficient. Even Example 3, which purports to be 'Passenger transport-led', appears to have been devised without taking into account some key factors. Little consideration seems to have been given to the strategic rail network. Developments to the north and north east of Harlow would involve an element of commuting to Harlow Town Station to reach employment in central London. The funded improvements to rolling stock and longer trains on the West Anglia routes would help with current capacity problems into London but are not sufficient to cope with the additional growth as a result of Stansted Airport and other trip attractors in the region. By contrast, the opening of Crossrail 1 will provide additional capacity on the Central Line from Epping Station.
- In terms of access to Harlow Town Station, and indeed to Harlow town centre, transport links from the north are hampered by the station's proximity to the A414. At Epping, there is an opportunity to improve access to the station by way of the currently disused trackbed to Ongar. If sustainable transport connections are not of sufficient quality, the impact on the road network would be greater.
- In particular confirmation should be sought that both station and rail infrastructure is positioned to be able to cope with likely demands placed upon it in respect to the preferred development sites.
- In relation to bus services HCC would seek to ensure that development is situated in locations where there are already existing services or where new quality, frequent, reliable services could be provided long term commercially and would therefore not be reliant on funding to operate and serve communities.

Roads

- The results of transport modelling to date have shown that for the level of infrastructure improvements tested the traffic impacts of a development of 10,000 homes in East Herts combined with 9,229 homes in Harlow could not be fully mitigated. Significant delay and highway stress also occurs in the wider area at a number of locations on the A1184 through Sawbridgeworth, and there would be further pressure on the A414 (particularly at Amwell junction and on the section between Eastwick and Burnt Mill) and on the A10.

- The proposed northern bypass appears aspirational and the limited testing to date in the HSGTM did not indicate that the scheme would alleviate congestion without substantial additional infrastructure within Harlow and the wider area as there is a relatively low proportion of through traffic within the town.
- Modelling work undertaken to date has indicated that potential capacity issues would exist on the Hertfordshire road network with a lower level of development (than that proposed in the emerging strategy) in and around Harlow. The proposals for 12,000 to 15,000 homes in the emerging strategy are therefore likely to require major investment in new highway infrastructure, if development went ahead, particularly if development was focussed on the north side of Harlow.
- It is important that the transport modelling takes account of the combined impacts from the proposals in Harlow as well as neighbouring authorities, and the HSGTM tests do include the cumulative impact of development. Further transport work is required to identify if there is an infrastructure solution for the Hertfordshire road network that can be delivered to mitigate the impact of the Harlow development allocations, along with developments in East Herts, including the 5,000 to 10,000 dwellings identified in the Gilston area.
- The East Herts Draft District Plan proposes a strategic scale development of between 5,000 and 10,000 new homes in the Gilston Area (north of Harlow), which will compound the impacts on the County's road network in this area, if there are additional allocations northeast of Harlow and in East Herts.

Ecology

- Vision 7. Improved access to the countryside laudable but will place increased pressure on the countryside. Particularly area of Hertfordshire separated by the Stort Valley.
- Example 1. Will significant environmental impact in Hertfordshire. Including; local wildlife sites, and possibly Hunsdon Meads SSSI.
- Example 2. No direct ecological impact in Hertfordshire.
- Example 3. Possibly twice the potential impacts on general open land area in Hertfordshire as Example 1. Possible direct impact on numerous other Wildlife Sites further north, and indirect impacts on others.
- Example 4. No direct ecological impact in Hertfordshire.
- Example 5. Will have the greatest negative ecological impact in Hertfordshire. This will cross the Stort Valley, fragment the landscape ecologically and visually, increase noise, light pollution and reduce what 'tranquillity' exists north of the river. Will affect Wildlife Sites and possibly also Hunsdon Mead SSSI.
- Q3. 'Avoiding sensitive environmental / landscape areas' is very important if the quality of the countryside around the town is recognised as providing an important asset to the town and its communities. Development to the north will provide yet another pinch point along the R.Stort corridor, and must be mitigated if development to the north of Harlow is pursued. Create a significant development within what is currently largely open countryside, for which good design would only limit the damage this will cause to this environment. However this is inevitable to an extent where greenfield development is required.
- Q5. Option would reduce major environmental / landscape impacts within Hertfordshire.

- Q7. Environmental impacts will be reduced within Hertfordshire under Example 4, so it is reasonable to assume that landscape objectives will be achieved.
- Any significant development around Harlow will exacerbate recreational pressure on the surrounding countryside, whether in Essex or Hertfordshire. May require increased provision for those services that help manage countryside features on behalf of a wider public, including the Lea Valley Country Park, ranger services and Wildlife Trusts.
- Important to recognise that the Stort Valley provides a direct linear corridor link to the Lee Valley between Herts and Essex and in this sense provides a continuum of resource which is of at least regional importance (international for some wildlife) and a major environmental feature between both counties. This applies to a lesser extent to east, south and west aspects of Harlow.
- Where traditional countryside management through farming still takes place, such enterprises should be supported to maintain the role they play in contributing to the countryside
- Local farming can help deliver some of the outcomes desired by the Local Plan aims, in particular Vision No.7.
- Many of these views are reflected within the Environmental Appraisal of the draft plan in terms of impacts of the various options and associated issues. Particularly paras 6.5.11 and 6.5.12
- Allotments and associated habitats provide open greenspace and can be of significant ecological interest locally.

Other

- The accompanying sustainability appraisal does not include options for accommodating growth of Harlow which have been considered or proposed in the recent past – for example, North Weald and east of the M11. You will no doubt wish to reflect upon this as you move forward with your plan as I am sure you will the dated nature of a sizable proportion of the evidence base.
- Requirements of Infrastructure Planning – At the pre submission consultation stage HCC require outline mitigation measures to be identified including broad cost estimates, indicative delivery timescales and an identification of funding sources with the expectation that this high level feasibility review will be refined moving towards submission of the Strategy.
- The County Council remains concerned about the effects Harlow has on the transportation infrastructure within Hertfordshire around the town - including the West Anglia Main Line (WAML), A414 and A1184.
- The HSGTM tests included an allowance for 9,229 homes within the Harlow, boundary which differs from the number of dwellings identified from the SHLAA (8,900). No allowance has been made for additional development outside the Harlow boundary other than that which meets adjoining districts needs. Therefore the number of dwellings tested is less than the number identified in the emerging strategy, and therefore this is likely to underestimate the scale of impacts.
- None of the options described in the emerging strategy appear to give sufficient consideration to transport infrastructure.
- It is recommended that Harlow Council liaise closely with Hertfordshire County Council, Essex County Council and East Herts to develop the evidence base. Should Harlow wish to include 12,000 to 15,000 homes within their plan the

outstanding mitigation issues, both highway and public transport, must be addressed.

- Landscape – There is overall concern for the lack of reference to landscape (and the supporting evidence base) within the emerging strategies vision and core priorities, despite leading to the presentation of examples 2 and 4 that promote a landscape led approach to development.
- It is strongly recommended that the area to the north of Harlow is subject to more detailed site based assessment, including landscape and visual impact assessments, to better understand the ability of the landscape to accommodate any change.
- Archaeology – Further consideration is needed on the potential for archaeology that may be present on land to the north of Harlow.
- Provided an overview of the services and facilities likely to be required if Example 5 (Northern Bypass Led) was to be provided. This consists of 10,000 dwellings to the north of Harlow.
- Provision would be required for new Primary and Secondary Schools, Early Years, Nursery Education and Childcare, Nurseries, Pre-Schools, Libraries, youth services and adult care services
- No additional fire and rescue services would be required.

East Hertfordshire District Council

General

- East Herts Council has taken a bold step in identifying the Gilston Area as a Broad Location for further testing, despite its long-standing opposition to the proposal. If it is ultimately demonstrated that there is no reasonable prospect of delivery in one or more of the Broad Locations, including the Gilston Area (north of Harlow), then East Herts Council will need to consider the implications for meeting the District's long-term housing needs.
- Regardless of whether any differences of opinion remain following consideration of the responses the Local Planning Authorities will need to continue to work together to obtain the necessary evidence inputs from the infrastructure and service providers, in particular from Essex County Council and Hertfordshire County Council.
- These inputs will then need to be subject to a process of viability and feasibility testing, which will be the central task of a Delivery Study for the District Plan during 2014. In order to achieve confidence in the outcomes of the study, maximum transparency will be maintained.
- East Herts Council is doing everything it can to progress the Plan as quickly as possible, as far as is consistent with maintaining a robust and transparent process.
- This will take strong and responsible leadership from the elected Members of both Councils, in order to understand and explain to the public the requirements of top-down national policy and ensure that, as far as possible local aspirations can be fully taken into account within this context.

Question 1

- It is agreed that “no growth” is not an option, given the requirements in the NPPF Paragraph 47 and elsewhere, and the strict way in which the Planning Inspectorate has been interpreting this at the Examination in Public of Local Plans.
- Option A provides for only 4,000 dwellings, significantly below the level of objectively assessed housing needs according to the Office for National Statistics (ONS) figures. This option would not be acceptable to a planning inspector at Examination in Public.
- Option B uses Office for National Statistics based demographic projections prepared by Edge Analytics, amounting to 7,500 homes and 3,000 jobs. This is the starting point for establishing objectively assessed needs and is commonly required by the Planning Inspectorate.
- Option C, Harlow Council has adopted a different methodology based on the SHMA figure of 3,600 affordable housing need for Harlow and using an assumption of 30% affordable housing provision to reach a housing requirement of 12,000 and 8,000 jobs. However, as acknowledged in Paragraph 4.8 of the Emerging Strategy, affordable housing rates could be as low as 10% of the total. At 10% the housing requirement would have to be 36,000, an absurdly high figure which illustrates the limitations of this methodology. Figures extrapolated in this way are not objectively assessed.
- Option D is based on the critical mass and regeneration aspirations of the Council set out in the Harlow Future Prospects Study: Linking Regeneration and Growth Study. It proposes 15,000 homes and 12,000 new jobs, but the methodology contained within the study is based on aspiration rather than objective assessment. Given the distance of the Gilston Area/north of Harlow from the M11 it is not clear that this area could host significant numbers of new jobs, even if funding for a new northern bypass connecting to the motorway were to be secured. Given low levels of job creation in Harlow, and the mixed success of the Enterprise Zone to date, East Herts Council questions the achievability of this option.
- Option E proposes 20,000 homes and claims to be able to “transform the role of Harlow into current day Cambridge”. Harlow Council recognises that this is not achievable.
- East Herts Council proposes that Harlow Council should pursue Option B as its objectively assessed housing need, rather than adopting an approach based on a questionable methodology and unrealistic aspirations set out in C and D. As acknowledged in the Emerging Strategy, up to 8,900 homes, or the entirety of Harlow Councils need, could be accommodated within Harlow District.
- An effective plan for growth of the levels set out in the Harlow Emerging Strategy will depend upon whether Epping Forest and/or East Herts Districts can realistically accommodate some of Harlow’s unmet need within their administrative areas, whilst also meeting their own housing needs within each separate housing market area.
- All three Councils need to take account not only of Harlow’s needs, but also of the practicalities of delivery and the wider strategy for the adjoining Districts, before it is possible to understand whether it is realistic to achieve the starting point suggested by the ONS projections. Only then will it be possible to consider whether higher levels of aspirational need can be sustainably accommodated and delivered through an effective plan.

Question 2

- Each option is based on achieving 15,000 new dwellings, however, based on ONS figures a lower figure of 7,500 new homes should also be considered

Question 3

- All of these principles are important, and indeed all of them need to be considered together in order to demonstrate that there is a sound plan. East Herts Council questions whether the approach based on general principles has moved forward the process of strategy and site selection beyond that set out in the Harlow Options Appraisal (2010). It is essential that both Councils work together to look at the practicalities of delivery. Principles such as these, whilst laudable, do not directly address the challenges.

Question 4

- No. Whilst it may be the case that some development within the urban area could provide additional housing as part of specific regeneration schemes, there is no explanation provided in Section 6 as to how Greenfield development could contribute to such objectives.

Question 5

- Yes. East Herts Council agrees with the statement in paragraph 7.1 that “east of the town is considered to have relatively less landscape significance (when assessed against other areas).” However, Example 2 does not mention the Stort Valley floodplain, which is the main environmental constraint around the town. This has implications in terms of bridging the floodplain, which in turn poses challenges for the viability of development to the north. This does not appear to have been considered within the consultation documents.

Question 6

- No. Large scale development to the north is likely to result in large amounts of commuting to London from Harlow Town and Harlow Mill Station. It may be that the scale of development could support additional internal bus services, although it is unclear whether this provision would be better than that resulting from development in other directions around the town.

Question 7

- No. The basis for this question is unclear. As per East Herts Councils response to question 4, there is no evidence to suggest that specific directions will help to achieve regeneration: the argument in Harlow Councils Future Prospects Study (2013) relates to critical mass overall, not specific locations.

Question 8

- No. Assessment of this will be a part of the East Herts Delivery Study during 2014, in which Harlow Council is invited to participate. Given the distance from the M11

and the cost of bridging the River Stort and the railway line, the costs of a north bypass would be considerable. Essex County Council has recently stated that estimates of a £100 million in earlier studies is a significant underestimate, and has stated that work currently being undertaken is likely to suggest a cost as high as £300 million-£400 million.

- It is very unlikely that even higher levels of growth north of Harlow could contribute anything more than a very small proportion of the necessary funding without significantly reducing funding for affordable housing, sustainability features and local transport measures.
- Developer contributions would normally be phased and even these relatively modest contributions would not be received until late in the plan period, after construction of a considerable number of dwellings. It is therefore likely that traffic congestion in and around Harlow would worsen before the completion of any northern bypass.
- In addition, interpretation of transport modelling results to date by specialists at Hertfordshire County Council suggests that a northern bypass would not itself adequately mitigate the transport impacts arising from large-scale development to the north.
- Example 5 suggests 20,000 dwellings for the area, implying higher levels of growth in East Hertfordshire north of Harlow, which would reduce the cost per dwelling for the bypass. Given a realistic phasing of development, much of this money would not be available to pay for a northern bypass until after 2031, and would therefore not play a significant role in mitigating transport impacts arising from the development.
- It may be that there are no feasible transport measures which can make any development acceptable in planning terms. This will need to be subject to rigorous feasibility testing involving the infrastructure providers over the coming months and years.

Question 9

- The basis for this question is unclear because it pays no regard to the practicalities of delivery. The question operates at a conceptual level. Harlow Council and East Herts Council need to work together closely over the coming year to focus on the practicalities of delivery rather than on theoretical approaches.

Epping Forest District Council

- We have found the Strategic Housing Market Assessment/ Duty to Co-operate Group, of which Harlow Council is a member, to be a particularly useful forum for Officers to engage on technical matters that relate to the determination of objectively assessed housing needs (OAHN). The remit – and title -- of this group is evolving into a forum for wider cross-boundary discussions and constructive actions that will hopefully lead to outcomes that can be politically supported by the authorities involved.
- As expressed by officers at a number of recent joint meetings, EFDC does not consider that it has a clear understanding of how the OAHN figure, housing capacity or jobs provision have been arrived at by Harlow Council, or the interrelationship

between them. We have recently discussed with you updating the SHMA on a joint basis to take account of latest national population data and determine what it means for Harlow, Epping Forest District and the respective housing market areas. We consider this to be an important stage in helping determine the OAHN for Epping Forest District and suggest that it will be just as important for Harlow. It is therefore difficult to make an informed response to this consultation until further information is available through the SHMA, and further engagement has taken place between Harlow and EFDC officers, as well as other relevant authorities. We therefore do not feel able to express a view on the most appropriate strategy as set out in your consultation.

- We note that there are a number of potential strategic development sites identified within Epping Forest District's (Green Belt) boundary in the consultation document, many of which have some history as potential development sites dating from the days of the East of England Plan. Before we can consider accommodating any need arising from Harlow, we need to understand the evidence, as highlighted above. Furthermore, at this early stage in developing our own Local Plan we anticipate that there may be problems in meeting our own development needs within the district. EFDC has not yet prepared a draft strategy for the location of future development within the district, and we wish to be clear that Harlow Council's identification of sites within Epping Forest District was not discussed with EFDC prior to your Cabinet's approval of the approach set out in the consultation document. EFDC considers this to be premature and does not support this approach.

Eastwick & Gilston Parish Council

- Oppose designation of land north of Harlow for housing development
- Substantial infrastructure deficit (limited capacity of road and rail network, hospital services and sewage treatment)
- Loss of Green Belt land
- Where is evidence that building here will regenerate Harlow?
- Are there not real options to build sufficient housing within Harlow?
- Are the affordable housing percentages achievable?
- Support Harlow's regeneration but simply building more houses in another county won't solve regeneration issues
- Securing local employment opportunities, encouraging quality retail outlets and stopping the loss of major companies will do far more than a separate dormitory town whose residents will go elsewhere for work and services

Hunsdon Parish Council and Eastwick & Gilston Parish Council

A consultant prepared a report which relates specifically to the East Herts District Plan Preferred Options consultation, and in particular the potential for development in the Gilston area to the north of Harlow. The report was endorsed by Hunsdon Parish Council and Eastwick & Gilston Parish Council (and the STOP Harlow North campaign group) and was submitted in response to the Harlow Local Development Plan Emerging Strategy consultation.

Whilst most of the issues relate to East Herts, the consultant has identified a number of potentially cross-boundary issues, summarised below:

- Development would be unsustainable and could not be delivered, and would fail tests of soundness, increase levels of pollution and degrade air quality
- East Herts and Harlow councils, through meetings under the duty to co-operate, recognise that such development could not come forward without the supporting infrastructure, especially transport provision
- Studies show that there is considerable stress on the local road network, particularly with the A414 through Harlow. Further work needs to be done to ascertain whether traffic impacts of development in this area could be mitigated
- The issue of the increased strain that the development would put on local public transport provision – which is already deficient – needs to be addressed
- Herts strategy highlighted that major public funding would not be available for water supply and drainage improvements
- Green Belt in this area is of special significance and applies particularly to Harlow in preserving the town's landscape structure. The Green Belt boundaries in this area are well-established and robust and should not be altered
- Landscape of great significance in terms of the setting of Harlow and developing it would breach important landscape threshold
- Previous studies have shown that land to the north of Harlow is more environmentally sensitive than land to the west, south or east
- Exacerbation of flooding and loss of agricultural land and wildlife habitats. No amount of green infrastructure would compensate
- Area under Stansted flight path - safety and noise concern
- Health facilities are under stress and new surgery would be required
- Currently no commitment from authorities to provide new schools
- Possibility of adverse effects on opportunities to provide social and community facilities in other local areas
- Plans would encourage out-commuting and rely on Harlow for employment
- Development to north of Harlow will compete with the town and hamper its regeneration
- Potential coalescence of villages around Harlow and other settlements to the north
- Alternative options for growth need to be considered and worked on

Highways Agency

General

- It is important that suitable sustainable transport solutions are available within any development that comes forward in and round these areas to ensure the impact of additional traffic on the network is reduced where possible.
- I note that 3,900 jobs are expected to be created in Harlow between 2012 and 2031. This does not match the predicted number of additional homes and therefore may result in greater levels of out commuting from Harlow than already occurs.
- The LP proposes a number of large development sites located relatively close to the strategic road network and therefore trips generated by these developments could have an impact of nearby junctions.

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- The evidence base should ideally include an evaluation of the cumulative and individual impacts of the district plan (and adjacent districts') proposals on the road links and junctions, with an assessment of the ability of the affected highway to accommodate the forecast traffic flows in terms of capacity and safety.
- Re the infrastructure provision plan – it is important that any funding shortfalls are identified early.
- There needs to be improvements in walking and cycling to and from developments and to encourage use of public transport. Encouraging sustainable transport is key to ensuring traffic generation on the surrounding network is minimised.
- I consider that the highways modelling assessment work done to date (primarily through the HSGTM) and TRANSYT model does not yet fully demonstrate the operation of the strategic road network following the implementation of all district plan development.
- Unless improvement schemes to the strategic road network are already committed it should not be assumed that the Agency will be able to fund any improvements to the strategic road network. It is likely therefore that developers will be a major source of funding through s106 or CIL.

M11 Junctions

- A large amount of development to the north of the town is reliant upon a new junction to the M11 J7a. The primary junctions of concern are M11 J7 (developments to the south in particular). Trips generated from developments in other locations to the north east and east may also have an impact at this junction but there is potential for dispersal by the time they reach the strategic road network and therefore the impact is less significant.
- J7a is currently not in any programme of works and its delivery and timing is somewhat uncertain, therefore it will be important to demonstrate that some development can be allowed to proceed with appropriate mitigation before the junction is delivered.
- From a review of the modelling it is evident that the proposed development aspirations have the clear potential to result in a material impact to the strategic road network – the impact varies with the various scenarios. It is clear that elements of the strategic road network will be operating near or in excess of capacity for any of the scenarios. The main areas of concern are:
- M11 J7: development will have an impact and that J7a will be required. However, no test has been undertaken to examine the cumulative impact of growth at Harlow north combined with growth at south of Bishops Stortford or North of Ware. These assessments are required to understand the full impact of development on the junction.
- The impacts on the strategic road network of two further options, a partial or full northern link road connecting the A414 at Eastwick Roundabout with the A118 or M11 J7a respectively, are also unclear.
- M11 J7a: there is an assumption in all the evidence presented so far that J7a is to be provided as mentioned. However this needs to go through a number of design and legal procedures which have the potential to delay its delivery. No measures have yet been put forward to allow growth to come forward before the implementation of J7a.

- M11 J8: Further testing here will need to include development proposed around Harlow.

Modelling, Mitigation & Impacts

- Detailed assessments identifying the mitigation measures that could be required have not yet been undertaken for all development, therefore it is unknown at this time if any 'major problems' exist that could result in adverse impacts to the strategic road network does not operate within capacity at the end of the plan period.
- A reasonable level of confidence needs to be established as early as possible that any mitigation measures can be delivered.
- Consideration will need to be given to the cumulative impact of all district plan development at each junction. Cross-collaboration should be undertaken with neighbouring authorities.
- Further modelling should be undertaken to identify the likely extent and location of the mitigation measures required,
- There is a risk that more detailed evidence could determine that the impacts are greater than what could be considered acceptable, and/or that infrastructure which can effectively manage the impacts is not deliverable. Additional detailed evidence should be undertaken and provided at the earliest opportunity so that the Agency can understand the impacts on the strategic road network and gain sufficient reassurance that impacts have been identified and appropriate and deliverable infrastructure measures can be brought forward.

Environment Agency

- Overall, we have no specific preferences for the strategy that is chosen for development in Harlow.
- Need to ensure that there is adequate infrastructure provision for new development and redevelopments, particularly for those areas of substantial growth.
- For individual site allocations, you will need to consider the constraints of each site.
- Flood Risk: areas of proposed growth largely avoid areas of fluvial flood risk (i.e. Flood Zones 2 and 3). Need to assess flood risk from all sources, using 2011 Strategic Flood Risk Assessment (SFRA) as a basis. Consider whether SFRA needs updating to reflect new or updated modelling or data, such as the 'Updated Flood Map for Surface Water' published earlier this year
- The Environment Agency has set out in their response guidance and advice in the National Planning Practice Guidance, with regards flood risk.
- The Rye Meads Water Cycle Study (WCS) is a key piece of evidence on infrastructure for the impact of the larger growth areas. This may need updating to assess the impact of the growth options as they stand.
- All new development and redevelopments should maximise the use of Sustainable Drainage Systems (SuDS). These could be important in regeneration areas where opportunities may exist to improve existing drainage systems.
- Promote the creation of new Green Infrastructure (GI) through new developments.

- Development areas should be assessed for opportunities to for environmental improvements, such as watercourse improvement, de-culverting and restoration of water courses.
- The Environment Agency have made comments on the specific sites identified in the Emerging Strategy.

Princess Alexandra Hospital NHS Trust

- Requested that the importance and role of the Hospital as a key community and economic facility is recognised in the emerging LDP for Harlow
- Support for the Trust's associated investment and development programme should also be referenced to, as well as the important contribution it will make to delivering sustainable development and economic regeneration
- Include a suitable planning policy basis to enable the Trust's development programme to be brought forward and delivered through the development management process where planning permission is needed
- Current Local Plan Policy CP4-Community should be carried forward into the emerging LDP
- Ensure that other vital infrastructure including transportation measures are provided in a phased way to meet the impacts of general housing and commercial development growth

West Essex CCG & NHS England (Agent: Lawson Planning Partnership)

- WECCG and NHSE commission all healthcare services, incorporating the provision of primary healthcare facilities within their administrative areas.
- The housing growth envisaged in the LDP will have a significant impact on the capacity of local healthcare services, requiring appropriate mitigation through developer provision of increased infrastructure and funding.
- Proposed growth in the LDP would, therefore, necessitate additional (developer funded) healthcare provision, which would principally be focussed on GP related medical services and supporting community health services.
- It is noteworthy that an increased draw down of NHS funding for the provision and maintenance of healthcare facilities and services over the Plan period would be experienced in Harlow independently of proposed growth. This is due to the ageing of the population and the associated increase in the proportion of patients with long term limiting conditions, by the increased disease burden and the increased incidence of obesity, smoking and alcohol consumption, which would all have a significant impact on the future health of the local population and healthcare capacity.
- WECCG and NHSE welcome the recognition that all growth options would require "careful phasing and implementation to ensure that development is delivered in a way that existing services can cope".
- The healthcare capacity position for these areas needs to be considered when determining the preferred approach for meeting Harlow District's housing needs.

- WECCG & NHSE have provided a detailed breakdown of healthcare needs (and contributions required) for each development scenario set out in the consultation document.

Natural England

- Increased populations in Harlow could cause increased use of Epping Forest and Lee Valley Regional Park – reference to these needs to be made in the Habitats Regulation Assessment
- Natural England wish to be engaged with the potential of a new M11 junction
- Concerns that a new junction could cause increased level of traffic and pollution through Epping Forest
- Natural England welcomes looking at previously developed brownfield land initially, to retain green wedges and respect the Gibberd Masterplan
- The ten core policies are broadly supported, specifically 6 (established quality streets and spaces), 7 (revitalised green spaces) and 8 (adapted to and mitigated the impacts of climate change)
- Development should be on suitable sites avoiding environmental impacts
- Communities should have access to an appropriate mix of green spaces, with at least 2 ha of accessible natural greenspace per 1,000 people (a more detailed breakdown is provided), possibly through use of existing Green Belt for recreation
- Sustainability Appraisal – Natural England broadly supports: the sustainability objectives, approach and methodology, use of relevant legislation in Section 6.3 and expansion of biodiversity and green infrastructure network. Under climate change section, link could be made to biodiversity, green infrastructure and SUDS

English Heritage

General

- English Heritage recognises the significance and distinctive character of Harlow as a Mark 1 new town which gives it historic significance and an opportunity to regenerate itself in a distinctive way
- Opportunity to draft policies that benefit the town's heritage assets and to consider site allocations that result in enhancements to the significance and setting of heritage assets
- Historic environment includes buildings with statutory protection, and the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown
- Comments on specific sites and potential development locations have been informed by desk-based analysis
- Reference to Harlow's history, distinctive character and heritage welcomed. Improve by reference to the town's designation as a Mark I New Town and the development of Gibberd's 1952 Masterplan, with reference to green wedges, and that future growth will have built on the New Town legacy
- Would like to see reference to the positive role of Harlow's built heritage in place-shaping. Need further characterisation, appraisal and assessment of the historic

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environment and Harlow's heritage. Opportunity for enhancements to the built and natural environment by recognising and valuing Harlow's architectural and landscape inheritance and using it to inform distinctive new development.

- Protection and enhancement of heritage should complement policies including regeneration and revitalising centres
- Protection and enhancement of green wedges welcomed, subject to the outcomes of the Green Wedge Review which retain the green Wedges with some limited redefinition and enhancement. Revitalised green spaces should include reference to green wedges and the role they play in delivering multifunctional green space
- Development at certain sites could impact upon designated heritage assets and their settings. Assessment of development impacts will be necessary, including visual impact and impacts of noise, dust, movement and vibration. Consideration should be given in the future to opportunities to protect, conserve and enhance the setting of heritage assets. The sites in question include:

Specific Areas/Sites

- Site 7 - Scheduled Monuments: Harlowbury deserted medieval village and a Roman villa; Listed Buildings; Conservation Areas at Harlowbury, Old Harlow and Churchgate Street; Registered Park and Garden at The House
- East of Newhall, various sites - Listed Buildings including Hubbard Hall; Conservation Areas at Churchgate Street
- Harlow North - Scheduled Monuments including moated sites and World War II defences; Listed Buildings in Eastwick, Gilston, Hunsdon, Hunsdonbury and High Wych and in Gilston Park; Conservation Areas in Hunsdon, Widford and High Wych
- Harlow South - Scheduled Monuments: a moated site and Latton Priory; Listed Buildings including the Grade II* Latton Priory
- West Kathrines & West Sumners - Scheduled Monument: a cold war anti-aircraft gun site; Listed Buildings; Large Conservation Area at Nazeing & South Roydon
- North East Harlow - Listed Buildings; Registered Park and Garden at The House
- Development at Harlow North, Harlow South, West Katherines & West Sumners and North East Harlow will require co-operative working with neighbouring authorities and the release of Green Belt land
- Town Centre should remain the main focus for Harlow, but its importance in defining the character of Harlow, especially in the case of Market Place, should be a key factor in its reuse and enhancement
- Implications for historic environment and historic assets for each example should be considered in the 'Implications' text
- Northern Bypass is a major development that would impact upon a number of designated heritage assets and their settings. Thorough assessment of effects necessary
- At this stage, English Heritage does not wish to select a preferred approach to accommodate growth in Harlow. We recognise that the preferred approach is likely to include combinations of the proposals put forward in the Examples.
- Future iterations of the Plan should fully and properly consider impacts on the historic environment and heritage assets when selecting options to go forward in the plan and associated policy documents

- Sustainability appraisal work for future iterations of the plan and associated policy documents should be informed by a strengthened evidence base for the historic environment to provide the basis for place-shaping policies

Thames Water (Agent: Savills)

- Harlow is served by Rye Meads Sewage Treatment Works (STW) which also serves areas of Broxbourne, East Herts, Epping Forest, Harlow, North Herts, Stevenage and Welwyn Hatfield. Development can have effects the on network and treatment upgrades required and neighbouring authorities should work closely with each other, and Thames Water, in the allocation and phasing of housing.
- There are options to expand the treatment facilities at Rye Meads STW within current operational boundaries but the degree of expansion required is currently unknown as a full understanding of development proposals for all authorities which drain to the STW would be required.
- As well as expansion of Rye Meads STW, options for localised wastewater treatment should be considered but this can only be considered where it is both sustainable and economic. As a result this option may be limited to the very large developments proposed. Should localised treatment options be preferred then these would not obviate the need to increase capacity at Rye Meads STW.
- Thames Water's preferred approach for growth is for a small number of large clearly defined sites to be delivered rather than a large number of smaller sites as this would simplify the delivery of any necessary infrastructure upgrades.
- As a general comment, the impact of brownfield sites on the local sewerage treatment works is likely to be less than the impact of greenfield sites. We would therefore support a policy that considers brownfield sites before greenfield sites.
- In relation to sewerage network requirements very small developments are likely to be able to be accommodated almost anywhere in the catchment. There comes a point when the scale of the development relative to the extent/cost of the sewer upgrades required becomes disproportionate. In this situation concentrating development sites within such an area reduces the unit cost of upgrade required. Focussing development sites to drain into the existing outfall corridor, east to west along the River Stort valley/Railway line, would enable economic solutions to be identified for the upgrades.
- To enable Thames Water to make a detailed assessment of the impact the proposed housing provision will have on local wastewater infrastructure we will require details of the Council's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development.
- It is essential that developers demonstrate that adequate wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing customers.
- Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.

- Thames Water have a suggested policy which it would like to have included within the plan.

Appendix 4: Comments received relating to the Sustainability Appraisal

SUB-GROUP 2

- Ensure that established facilities and services are retained and able to develop for the benefit of the community. This guidance is contained in the Sustainability Appraisal but not in the Emerging Strategy.

SUB-GROUP 4

- The Sustainability Appraisal suggests that option 1b would result in significant negative effects in terms of biodiversity. However, the Hunsdon Mead SSSI, Harlow Wood SSSI and Mark Bushes Wood LoWS are distant from Harlow West

HERTFORDSHIRE COUNTY COUNCIL

- The accompanying sustainability appraisal does not include options for accommodating growth of Harlow which have been considered or proposed in the recent past – for example, North Weald and east of the M11. You will no doubt wish to reflect upon this as you move forward with your plan as I am sure you will the dated nature of a sizable proportion of the evidence base.

NATURAL ENGLAND

- Sustainability Appraisal – Natural England broadly supports: the sustainability objectives, approach and methodology, use of relevant legislation in Section 6.3 and expansion of biodiversity and green infrastructure network. Under climate change section, link could be made to biodiversity, green infrastructure and SUDS

ENGLISH HERITAGE

- Sustainability appraisal work for future iterations of the plan and associated policy documents should be informed by a strengthened evidence base for the historic environment to provide the basis for place-shaping policies

Appendix 5: Youth Council presentation & discussion

The following is a summary of the comments that were made by members of the Youth Council at a presentation and discussion event which took place with them.

Housing and Open Spaces

- Is there enough space to build this level of housing?
- Harlow is a cultural town with lots of open spaces that are used a lot (e.g. the Town Park and playing fields)
- Harlow is already struggling to keep its open spaces and not become too industrial
- Housing is needed, but people may not want to live in Harlow if too much green space is lost
- The open spaces in Harlow are the nicest parts of it
- Epping and East Herts should build their own housing, but that is doubtful as they would lose their Green Belt land
- Flats are often dressed up as apartments but flat blocks can negatively affect communities
- A mix of flats and houses are needed to house different people (e.g. flats are often used as starter homes)

Opportunities in Harlow

- Nice areas in Harlow are often spoilt by derelict housing which needs to be regenerated
- All towns and cities have ups and downs, but Harlow town centre is too 'grey' and parts of it are run down and dirty
- The hatches could be nicer – e.g. Elm Hatch's closed pub is a focal point for crime and the buildings are falling down
- There is a lot for young children to do in the town, but little for teenagers
- There are many sport opportunities but they're not what everyone wants to do
- There is a lot for people to do in Harlow but people often don't make use of facilities – e.g. skate park, cinema, etc.
- There is little vacant space in local libraries – particularly during revision periods
- Young people have ambitions to move away because of limited job opportunities in the town
- There is a lack of high quality sixth forms
- Parking is often a problem and it needs to be recognised that many houses now have two or three cars
- The cost of public transport is too high
- The whole of Harlow is pretty good
- The development at Park Lane (next to the Town Park) is a good way of integrating green space into new developments
- Church Langley is the nicest area, partly because of the newer housing
- New Hall is a good mix of housing and open space
- Church Langley and New Hall are nice in terms of cleanliness and green space but limited in terms of housing size

- Church Langley is full of similar looking housing and you can get lost in it
- Many community events take place in Church Langley
- There should be more money put into education so people will have better jobs and prospects, so they will be able to afford housing

Development Examples

- Land around Nazeing and Katherine's could be used to build on
- Existing properties should be refurbished and regenerated
- Examples 1 and 2 are spread out and preserve green spaces
- Example 4 provides housing and regenerates needy areas
- Example 5 is too focused on one area
- Example 5 is best because it focuses the development in one area

Appendix 6: List of consultees

- **SPECIFIC CONSULTTEES (51)**
 - British Gas
 - British Waterways
 - Broxbourne Council
 - BT Openreach
 - East Herts District Council
 - East of England Ambulance Service NHS Trust
 - Eastwick and Gilston Parish Council
 - English Heritage
 - Entec UK Ltd
 - Environment Agency
 - Epping Forest District Council
 - Essex County Council - Highways & Transportation
 - Essex County Council
 - Essex County Fire & Rescue Service
 - Freight Transport Association
 - Harlow Council - Contact Harlow
 - Hertfordshire County Council
 - Highways Agency
 - Historic Environment Branch
 - National Express East Anglia
 - National Grid
 - Natural England
 - Network Rail
 - North Weald Bassett Parish Council
 - Roydon Parish Council
 - Sport England
 - Thames Water (Savills)
 - UK Power Networks
 - West Essex Primary Care Trust
 - Affinity Water
 - Anglian Water
 - East of England Development Agency
 - Epping Upland Parish Council
 - Essex Police
 - GO East
 - Harlow Primary Care Trust
 - Homes and Communities Agency
 - Hunsdon Parish Council
 - Lee Valley Water PLC
 - Little Hadham Parish Council
 - Matching Parish Council
 - Mobile Operators Association

- Much Hadham Parish Council
- Nazeing Parish Council
- NHS England - Essex Area Team
- NHS West Essex
- Princess Alexandra Hospital NHS Trust
- Sawbridgeworth Town Council
- Sheering Parish Council
- Transco
- Widford Parish Council

- **LOCAL GROUPS AND ORGANISATIONS (144)**
 - Abbotsweld Primary School
 - All Ability Sports and Leisure
 - Army Cadets
 - Blue Birds Badminton Club
 - Brenda Taylor School of Dance and Performing Arts
 - Broadfields Primary School
 - Buddhist Group Harlow
 - Burnt Mill School
 - Canal Boat Project
 - Chelmsford DBF
 - Christ Embassy
 - Church Langley Church
 - Church Langley Primary School
 - Church of England
 - Church of England Church Commissioners
 - Church of the Assumption of our Lady
 - Churchgate C of E Primary School
 - Commission for Racial Equality
 - Commonsides Christian Fellowship
 - David Livingstone URC
 - Diocese of Chelmsford
 - East Potential - Harlow Foyer
 - Elim Church of Pentecost
 - Equal Opportunities Commission
 - Essex CC Harlow Centre
 - Essex Youth Service
 - Fawbert & Barnard's Primary School
 - Foyer
 - Freshwaters Christian Fellowship
 - Friends, Families and Travellers and Traveller Law Reform Project
 - Gateway Christian Fellowship
 - Glen Savage
 - Great Parndon Library
 - Gypsy Council
 - Gypsy Services Manager
 - Gypsy & Traveller Law Reform Coalition
 - Hare Street Community Primary School & Nursery

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- Harefield Church
- Harlow & District Chinese Community Centre
- Harlow and District Access Group
- Harlow and Epping Social Club for the Blind
- Harlow Area Access Group
- Harlow Ballet School
- Harlow Baptist Church
- Harlow Black Culture Group
- Harlow Central Library
- Harlow Centre for Outdoor Learning
- Harlow College
- Harlow District Scout Council
- Harlow Education Consortium
- Harlow Ethnic Minority Umbrella
- Harlow Faiths Forum
- Harlow Fields School and College
- Harlow Handicapped Sports Foundation
- Harlow Islamic Centre
- Harlow Jewish Community
- Harlow Latton Bush Centre Mosque / Harlow Muslim Society
- Harlow MENCAP
- Harlow Milan Mandel
- Harlow Northbrook Muslim Community
- Harlow One Stop Shop
- Harlow Passmores Congregation of Jehovah's Witnesses
- Harlow Philippines Culture Group
- Harlow Sea Cadets
- Harlow Sikh Society
- Harlow Social Club for the Physically Disabled
- Harlow Star Youth Community League
- Harlow Vietnamese Catholic Community
- Harlow Wildcats Basketball Club
- Harlow Youth Action Group Football For All (HYAGFFA)
- Harlow Youth Council
- Harlow Youth Netball Action Group (HYNAG)
- Harlowbury Primary School
- Herts and Essex Boarder Ecumenical Area
- Herts and Essex Muslim Cultural Association
- Holy Cross Catholic Primary School
- Hope Church Harlow
- House of Mercy Ministries
- Jack & Jill's Nursery
- Jehovah's Witnesses
- Jerounds Community Infant School
- Jerounds Junior School
- Katherines Primary School
- Kingsmoor Primary School
- Latton Green Primary School
- Learning and Skills Councils
- Light House

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- Little Parndon School
- Makin' Steps School of Dance & Performing Arts
- Maranthara
- Mark Hall Library
- Mark Hall Specialist Sports College
- Milwards Primary School & Nursery
- New Life Christian Fellowship
- Oakwood Chapel
- Old Harlow Library
- Our Lady of Fatima & St. Thomas More Catholic Church
- Paringdon Junior School
- Passmores Comprehensive School
- Pear Tree Mead County Primary School
- Peterswood Infant School & Nursery
- Potter Street Baptist Church
- Potter Street Primary School
- Purford Green Junior School
- Purford Green Primary School
- Redeemed Christian Church of God Lord's Vine Parish
- Redeemer Lutheran Church
- Religious Society of Friends (Quakers)
- Science Alive
- Seventh Day Adventists Church
- South East Harlow Youth and Sports Association SEHSYA
- Spinney Infants School
- Spinney Junior School
- St Albans Catholic Primary School
- St James C of E Primary School
- St James Church
- St Luke's Catholic Primary School
- St Mark's West Essex Catholic School
- St Nicholas School
- St. Andrew's Methodist Church
- St. John's Arts and Recreation Centre
- St. Lukes and Holy Cross Church
- St. Mary Magdalene
- St. Mary-at-Latton
- St. Mary's Church Great Parndon
- St. Mary's Churchgate Street
- St. Paul's - Harlow Town Centre Parish
- St. Stephen's Church
- Stewards School
- Tany's Dell Community Primary School
- The Downs Primary School & Nursery
- The Henry Moore Primary School
- The Museum of Harlow
- The National Federation of Gypsy Liaison Groups
- The Roman Catholic Diocese of Brentwood
- The Salvation Army
- Trinity URC

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- Tye Green Library
 - Water Lane Primary School
 - West Essex Mind
 - William Martin C of E Infant & Nursery School
 - William Martin C of E Junior School
 - Young Concern Trust
 - Young Peoples Information Centre
- **OTHER CONSULTEES WHO WISHED TO BE NOTIFIED (INCLUDING LOCAL BUSINESSES, RESIDENTS, COUNCIL OFFERS AND COUNCILLORS) (2,139)**

Appendix 7: Respondents

Name		Organisation/Company	ID	Sub-group
Andrew	Acher		7858	1
Ian	Beckett		7894	1
Colin	Black		6114	1
Alan	Bolden		7924	1
Philip	Bradbury		7857	1
Joel	Charles	Harlow District Council	7922	1
Lindsey	Cox		7892	1
Jonathan	Dance		7907	1
Matthew	Dixon		7699	1
David	Eve		7938	1
Giulia	Festa	Harlow District Council	7918	1
Karen	Garrod		7961	1
Anne	Geiss		7923	1
David	Giess		5825	1
David	Gould		5901	1
Gill	Gould		6124	1
Sandra	Gray		7846	1
Robert	Gray	West Sumners Residents Association	7926	1
Ursula	Grover		7898	1
Peter	Hawkes		7895	1
VICKI	HUNDLEY		7893	1
K	Johnson		7911	1
Moira	Jones		5031	1
Beverly	Le Long		7925	1
Albert	Lidbury		7891	1
Clive	McQuinn		7847	1
Bernard	Mella		5913	1
Colleen	Morrison		5674	1
Barbara	Noble		5680	1
sean	ockenden		7865	1
Robert	Quinn		7919	1
Joy	Robinette	Hunsdon Parish Council	7878	1
Paula	Robinson		5677	1
Mark	Rowe		7845	1
Warren	Scott		7862	1
Sally-Ann	Simpson		7843	1
Andrew	Stuttle		5754	1
Sheila	Sullivan	Morley Grove Residents Association	5043	1
Toni	Swatton		7905	1

Nicholas	Taylor		5738	1
Edward	Vine	vine	7890	1
Julie	Vinton		6007	1
Mary	Wiltshire		6026	1
Janet	Ballard	Roydon Parish Council	5434	2
Andrew	Bramidge	Harlow Council	7848	2
	Chairman	PAH NHS Trust (agent: Lawson)	4683	2
Anna	Cronin	Epping Forest District Council	7940	2
John	Curry	Harlow Civic Society	5318	2
Sue	Dobson	Essex Bridleways Association	7887	2
Paul	Donovan	Hertfordshire County Council (Transport)	4676	2
Rose	Freeman	The Theatre Trust	216	2
Andrea	Gilmour	Hertfordshire County Council (Development Services)	7904	2
Clark	Gordon	Environment Agency	7942	2
John	Greenaway		5284	2
Richard	Hanrahan	Bruce Maintenance Services Ltd	3477	2
Neela	Hibbert	Harlow Ethnic Minority Umbrella	154	2
Martin	Hicks	Hertfordshire County Council (Ecology)	7951	2
John	Horgan	Bush Fair Management Ltd	7913	2
Riaz	Hussain	Medicare Pharmacy	7902	2
	Manager	Fish Brothers	3740	2
	Manager	Harlow College	3833	2
	Manager	Thames Water (agent: Savills)	7944	2
Mark	Norman	Highways Agency	7939	2
Zhanine	Oates	Essex County Council	5406	2
Aarti	O'Leary	West Essex Clinical Commissioning Group & NHS England (agent: Lawson Planning)	5845	2
Mark	Orson	Eastwick & Gilston Parish Council	7610	2
Mark	Owen	Barton Willmore	7950	2
Martin	Paine	East Herts District Council	5682	2
Carol	Richards	Chelmsford Diocese Board of Finance (agent: Strutt & Parker)	7772	2
Consultation	Service	Natural England	7715	2
Roy	Warren	Sport England	7871	2
Bob	Weaver		3345	2
Mark	White	English Heritage	7937	2
David	Wright MBE	Memorial University of Newfoundland - Harlow Campus	6014	2
Elizabeth	Ainsworth		7864	3
Janet	Ballard		7908	3
Anthea	Bickmore		7964	3
Alan	Burgess	Alan Burgess	26	3
Nigel	Clark	STOP Harlow North	25	3

Colin	Gamage		7899	3
Phillip	Gibb		5725	3
Christopher	Long	Harlowsave Credit Union Ltd	7917	3
Madeleine	Paine		7850	3
Nicola	Wilkinson	The Roydon Society	27	3
Michael	Wilson-Roberts		7914	3
Karen	Wilson-Roberts		7915	3
Matt	Wright		7853	3
Tracyann	Wright		7856	3
Mark	Bedding	City and Provincial Properties Ltd (Savills)	5294	4
Anna	Davies	Persimmon Homes	7948	4
	Manager	Barratt Eastern Counties (agent: Bidwells)	7934	4
	Manager	Stort Landowners (agent: Sworders)	7936	4
	Manager	Kier Homes (agent: Savills)	7953	4
	Manager	Harlow West Consortium (agent: Pegasus)	7954	4
	Manager	Quod	7957	4
	Manager	Commerical Estates Group and Hallam Land Management (agent: Boyer Planning)	7960	4
	Manager	ReAssure Ltd (agent: Indigo Planning)	7963	4
Bob	Sellwood	Crest Strategic Projects	7935	4
Olivier	Spencer	Miller Homes (agent: Andrew Martin Planning)	5433	4
James	Stevens	Home Builders Federation	7947	4
Manager		Hubert C Leach (Leach Homes)	7933	4

Appendix 8: Example of notification letter

«Short_Name»
«Organisation»
«Address»
«Post_Code»

Forward Planning
Harlow Council
Civic Centre
The Water Gardens
Harlow
Essex CM20 1WG
www.harlow.gov.uk

Telephone: (01279) 446 577
Email: myharlow@harlow.gov.uk
Date: 11 April 2014

Dear «Short_Name»,

HARLOW LOCAL DEVELOPMENT PLAN

Harlow Council is preparing a Local Development Plan for the period of 2011 to 2031. The Plan will set out how the town will develop, including how many new homes are needed and where development will take place. You have been contacted as you are on our consultation database. If you wish to no longer be informed about the progress of the Plan, please email us and request your removal from the database.

The Council previously consulted on an Issues and Options document. However, the Council is now reviewing the strategy for Harlow and has also prepared a revised Statement of Community Involvement, following Government changes to the planning system. These documents can be downloaded from the Council's website at www.harlow.gov.uk/local-plan or viewed at the Civic Centre, Central Library and Old Harlow Library during normal opening hours.

The public consultation on the documents runs from **Monday 14 April to Friday 30 May 2014**.

Emerging Strategy and Further Options

The Emerging Strategy and Further Options document presents five examples of how new housing development could be accommodated within Harlow. A questionnaire on the Strategy can be completed online at www.harlow.gov.uk/local-plan Alternatively a hard copy can be printed from the website and returned to Forward Planning, Harlow Council, The Civic Centre, Water Gardens, Harlow, Essex CM20 1WG. The questionnaires will inform the preparation a preferred spatial strategy which will be further consulted on. Information about public exhibitions being held in Harlow during the consultation can be found on the website

Statement of Community Involvement (SCI) Draft Review

The SCI sets out how and when the Council will consult with people on planning matters and how they can get involved. Comments on the SCI Draft Review can be emailed to myharlow@harlow.gov.uk or returned to the postal address above. Comments will be considered by the Council before the Review is adopted.

By responding you are giving your consent to the Council to hold and process your personal data in accordance with the requirements of the Data Protection Act 1998. Your name, organisation and comments may be available for others to view at the Council's offices and on the Council's website. The data gathered through this consultation will be held for the duration of the LDP up to and probably beyond 2031.

If you have any questions, please telephone 01279 446577 or email myharlow@harlow.gov.uk

Yours sincerely,

Dianne Cooper
Planning & Building Control Manager

Appendix 9: Harlow Times news article (Spring 2014)

Planning Harlow's Future

Consultation on the next stage of the Local Development Plan, looking at the possible location of future housing in Harlow, is set to start this spring.

The consultation findings will help to prepare the new statutory Local Development Plan for Harlow, guiding future development in the town up until 2031.

The Plan will reflect the future needs of the community and businesses and provide a framework for the consideration and assessment of planning applications.

→ The consultation will be advertised in the local press and on the Council's website: www.harlow.gov.uk/local-plan

Appendix 10: Harlow Star news article (30 January 2014)

NEWS FOCUS Harlow Local Plan email: star@harlowstarnews.co.uk

Could Harlow become the next Cambridge by 2031?

GEMMA GARDNER

gemma.gardner@harlowstarnews.co.uk

HARLOW Council is hoping to create a town of "aspiration, innovation and prosperity" as they prepare their blueprint for development over the next 20 years.

Last Thursday, the authority's cabinet agreed to hold a public consultation on their proposals.

The work will help prepare an updated statutory Local Plan for Harlow which will guide where future new housing, jobs and services will go in the town up until 2031.

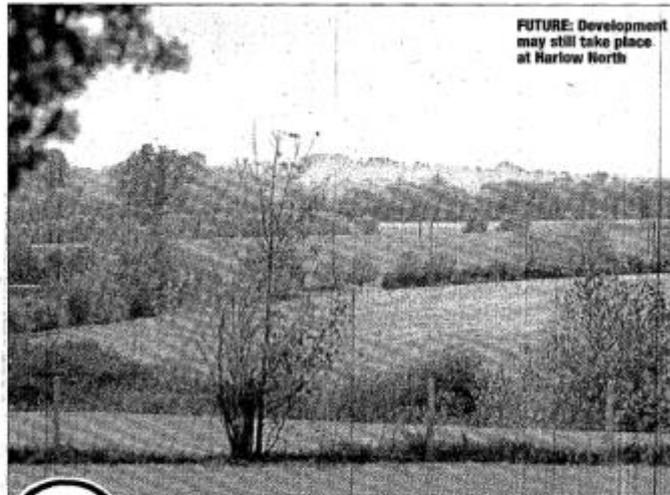
Clr Paul Sztumpf, portfolio holder for regeneration and chairman of the local development plan panel, said: "The local plan will provide a framework for the town to secure more and better housing, regeneration, a thriving economy, a green environment and social inclusion. Securing all of these will not come without significant challenges, particularly when it comes to protecting our environment."

Harlow's Local Plan will need to reflect the future needs of the community and businesses, as well as provide a framework for the consideration and assessment of planning applications.

The consultation will involve asking the public and businesses for views on a series of development scenarios which aim to provide more housing and jobs. The consultation will also include looking at where housing could go in the town and outside the town's borders to meet Harlow's future needs.

Five options are being put forward by Harlow Council. These options provide between 4,000 and 18,000 homes and between 1,200 and 18,000 jobs respectively.

Choosing the later option would provide enough homes to "transform Harlow into the



WHERE IN HARLOW SHOULD FUTURE DEVELOPMENT TAKE PLACE? HAVE YOUR SAY AT www.harlowstar.co.uk

inquiry in public."

Each option focuses on a different vision for the future from regeneration to improving transport links and infrastructure.

Councillor Phil Waite, portfolio holder for environment, said: "All of the suggested

thing we should do."

Conservative group leader Clr Andrew Johnson said: "I fully support more and better housing through regeneration and growth, but I've some concerns about giving a planned number of options to the public."

present-day Cambridge" according to a report to councillors.

But Cllr Sztrumpf was keen to point out that the proposals could change based on public reaction.

He said: "They are examples - it's all open for debate. This consultation is completely not about giving up our green spaces, it's about strengthening our protection in the case of an

options will be subject to further evaluation taking into account such matters as schools, health services, transport and the results of the consultation."

And Cllr Tony Durcan, portfolio holder for resources and enterprise, said: "If we want to move this town forward we need housing, [and] some needs to be in Harlow. We must look at Harlow first. It's overdue and some-

"It will be very easy for the public to think Harlow Council want to build in those places. I don't think they'll be happy with any of the examples in this report."

Cllr Emma Toal, portfolio holder for youth and citizenship, said: "What do the people of Harlow want this town to be like in 2031? I'm quite excited and looking forward to what the public have to say."

'We'll be at the mercy of developers without plan'

A 'ROBUST' local plan will help to protect Harlow from developers, the town's ruling Labour group say.

Cllr Paul Sztrumpf explained that without a local plan, rejected planning applications could be overturned by the Government's planning Inspectorate.

He said: "The truth is Eric Pickles, the Government's local government minister, has transformed our national planning system into a fragmented, developer led wish list.

"The local plan is local people's best and only means of shaping their own environment. I hope a maximum number of people will participate in this consultation. Without a robust local plan, developers who get planning permission refused locally, will simply appeal to Mr Pickles and win as they did on Gilden Way."



Council leader Mark Wilkinson, pictured, said: "New housing, new jobs and having the right infrastructure is key to Harlow's future. These are important issues for the town and are among the highest priorities for our residents.

"We are committed to developing this plan in an open and transparent manner and I hope the consultation will bring about a healthy debate.

"We need new housing for Harlow people but where should it go?"

Councillor Phil Waite, portfolio holder for environment, said: "If the plan is not robust, supported by objective evidence, and reflects the views of Harlow people, we will be at the mercy of developers and the planning Inspectorate. Decent housing is crucial for the thriving community and has to be our priority."

Land identified as possible sites for housing until 2031

- >> Land west of Sunners
- >> Land east of Katherines
- >> Harlow north
- >> Land south of the town between Harlow and Epping
- >> Land north of Gilden Way and the playing field south of Gilden Way
- >> Former Passmores School
- >> Land east of the Newhall development
- >> Terminus House and car park
- >> Purford Green School
- >> Garage blocks adjacent to Nicholls Tower
- >> Slacksbury Hatch and associated garages
- >> Wissants and adjacent playground
- >> Kingsmoor House and car park

For a full list of sites visit www.harlow.gov.uk.

No new housing 'is not an option'

RESIDENTS and businesses are being urged to have their say on where new homes and jobs should be created in Harlow.

Consultation on Harlow Council's Local Plan, a blueprint for future development in the town, starts on Monday.

Views will be sought on five different examples for how new housing developments could be accommodated within Harlow and possible locations outside the town.

The council say all examples "protect Harlow's existing green spaces as much as they can".

A council spokesman said: "Harlow was never meant to stand still and today Harlow faces a number of issues and development pressures.

"The council needs to plan for the future by providing development to meet local needs and to deliver the regeneration of the town."

The Local Plan will set out how many new homes and jobs are to be provided in Harlow up to the year 2031.

It should reflect the future needs of the community and

GEMMA GARDNER

gemma.gardner@herbesssexnews.co.uk

businesses, and will provide a framework for the consideration and assessment of planning applications received by the council.

To achieve the council's key priorities of delivering more and better housing, regenerating the town and stimulating the local economy, evidence shows that between 12,000 and 15,000 new homes and between 8,000 and 12,000 jobs will be required up to 2031.

Planning permission has already been granted for 4,500 homes in Harlow, so locations for a further 7,500 to 10,500 homes need to be identified.

Approximately 30 per cent of new homes will be affordable/social housing to help families and individuals that cannot currently afford to buy their own home.

The council is required by Government policy to boost significantly the supply of housing to meet the needs of the community, which means that 'no housing growth' is not an option.

The spokesman added: "If we do not deliver the housing to support regeneration the risk is that Harlow will decline.

"We all know what new housing and new jobs mean to Harlow so we need as many people from the young to the old and all sized businesses to let us know their views on this vital issue.

"We want to start a healthy debate on Harlow's future. We need new housing for Harlow people but where should it go?"

The council has published the Emerging Strategy and Further Options document for consultation and this document can be read and views given at www.harlow.gov.uk/local-plan from today. Further consultations will take place later this year.

The document will also be available in the Civic Centre, Central Library and Old Harlow Library. Exhibitions will also be held throughout the consultation and details of these will on the Council's website.

The consultation closes on May 30.

Appendix 12: Harlow Star news article (8 May 2014)

EMAIL: star@harlowstarnews.co.uk

Follow us on Twitter

Examples of new housing developments go on display

RESIDENTS will be able to learn more about the five examples of how new housing development could be accommodated within Harlow as plans are due to go on display.

Details will be shown at local development plan exhibitions which are staffed by members of Harlow Council's forward planning team.

The exhibitions will give residents and businesses the opportunity to see the five examples of new housing development, which form part of the proposed Emerging Strategy and Further Options consultation.

The consultation has been running since April and, after the consultation results are in, one - or a combination of examples - will become a part of the emerging Local Development Plan.

Visitors will be able to pick up copies of the consultation leaflet and questionnaire as well as talk to members of the Forward Planning Team about the proposals.

The exhibitions will be held at the Latton Bush Centre, Southern Way on Wednesday, (May 14) from 3-9pm and another at the Harvey Centre on Wednesday, May 21 from 10am-5pm.

There will also be an unstaffed exhibition at the Civic Centre in the Water Gardens and from May 22 a second unstaffed exhibition at Harlow Central Library. Both stands will be available for viewing until May 30 when the consultation comes to an end.

Responses to the consultation can be made via the questionnaire.

For more information on Harlow's Local Development Plan and the consultation - visit www.harlow.gov.uk/local-plan.

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Appendix 13: Exhibition board panels



Harlow 2031 – Have your Say

The Council is currently preparing a new Local Development Plan which will cover the period 2011 to 2031. This plan sets out how many new homes and jobs are to be provided in Harlow by 2031. The plan will also include locations where development will take place.

Development Needed - The Council is required by Government planning policy set out in the National Planning Policy Framework to boost significantly the supply of housing in order to meet the needs of the community. This means that 'no growth' is not an option for the new Local Development Plan.

The Council's key priorities are to deliver more and better housing, regeneration and a thriving economy. To achieve these priorities evidence shows that between 12,000 and 15,000 new homes and 8,000 to 12,000 jobs between 2011 and 2031 will be required to meet Harlow's objectively assessed development needs and to deliver the regeneration of the town.

Accommodating Future Development - In Harlow 4,500 homes have planning permission so locations for a further 7,500 to 10,500 dwellings will need to be identified to meet housing need. Five examples of how future development could be provided across Harlow are proposed; each focuses on different Council priorities.

The Council wants your views on the preferred level of development and the examples presented.

The consultation runs from **Monday 14 April to Friday 30 May 2014**. The consultation document can be viewed online at www.harlow.gov.uk/local-plan or at The Civic Centre, Central Library or Old Harlow Library.

If you have any comments these should be made by completing the online questionnaire.

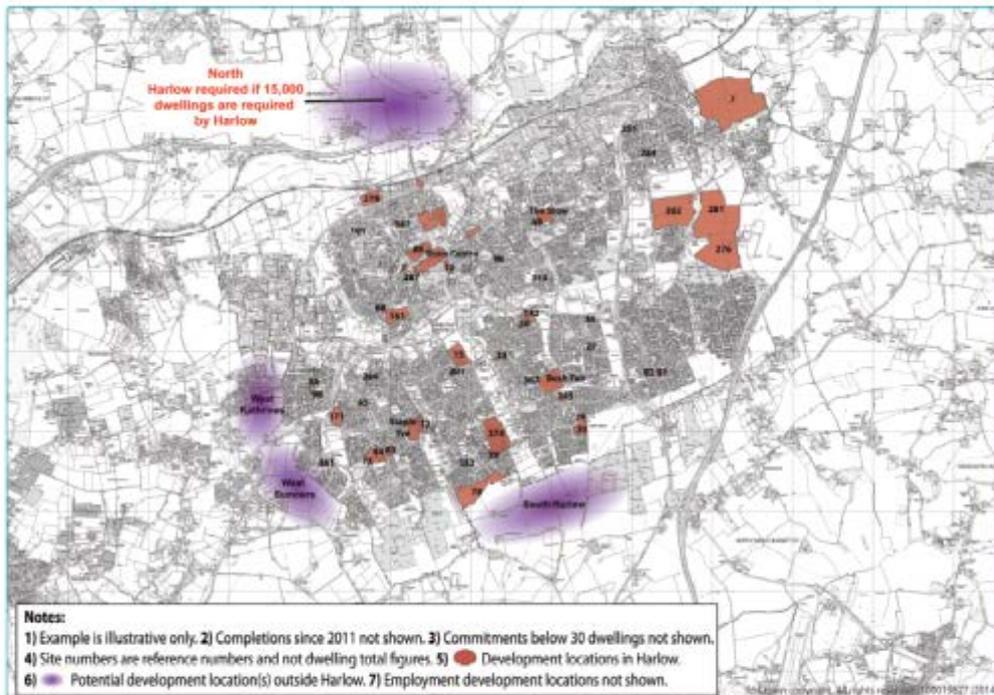
If you wish to discuss this consultation further please contact Forward Planning on 01279 446897 or email myharlow@harlow.gov.uk



Example 1 – Focused on Priority Regeneration Areas

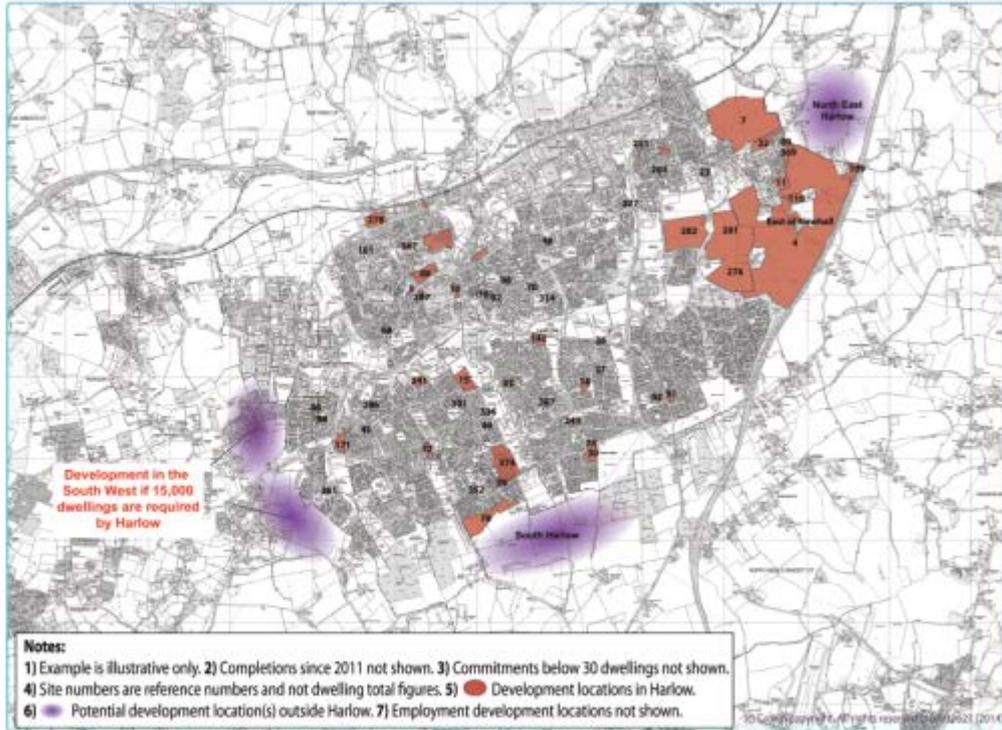
- Focusing development in and around identified priority areas for regeneration.
- Providing additional residential development through the redevelopment of Town Centre and Neighbourhood centres.
- Any development required outside Harlow's boundaries is suggested to be located in areas most likely to help regeneration objectives.
- Development to the north is suggested if 15,000 dwellings are required to support the regeneration of the town.

The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.



Example 2 - Environmental / Landscape Led

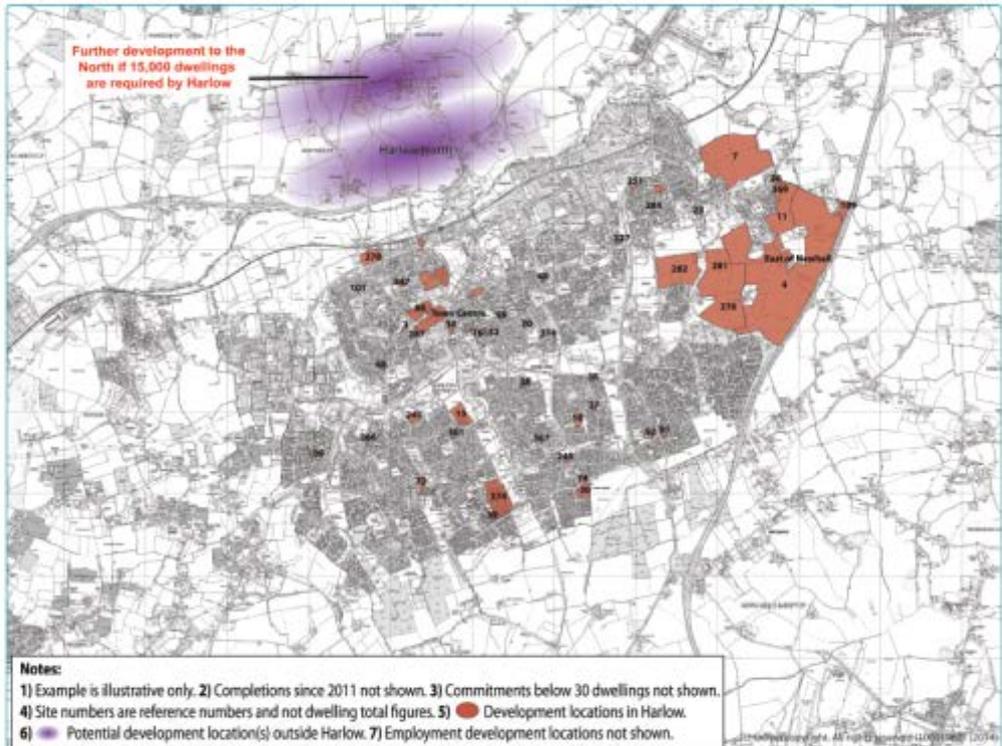
- Focusing development on the less sensitive environmental areas within Harlow.
- Any development required outside Harlow's boundaries to be focused to the north east and south within the ridge line of Harlow which has less landscape and environmental constraints.
- Development to south west is suggested if 15,000 dwellings are required.



Harlow's Local Development Plan

Example 3 – Passenger Transport Led

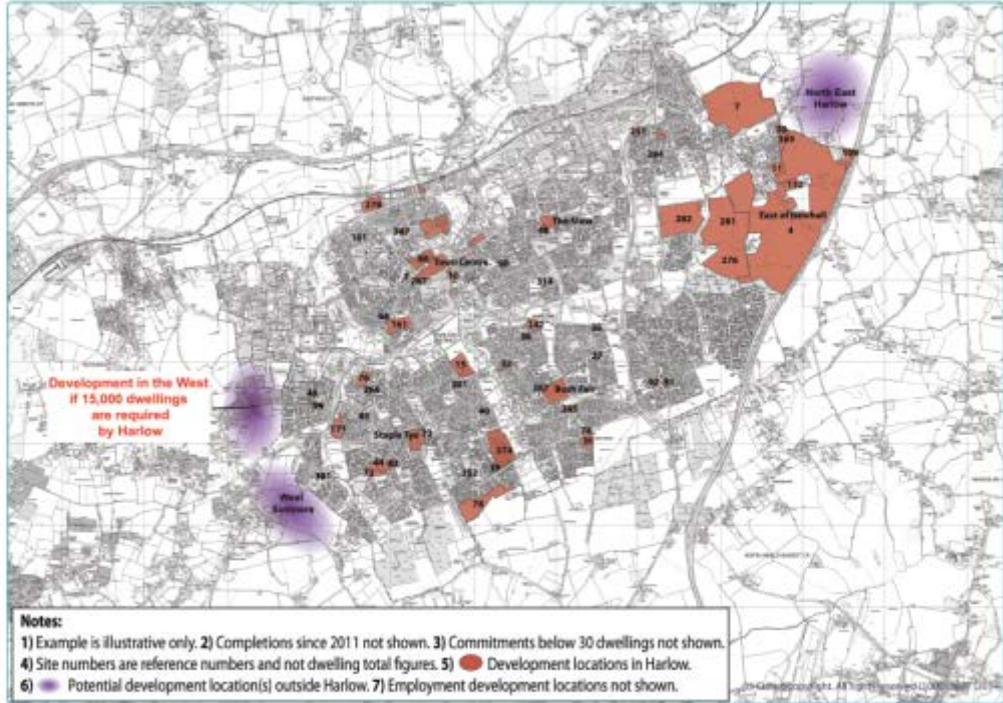
- Focusing future development within Harlow closer to passenger transport hubs such as the train stations and Town Centre bus interchange.
- Development locations in south Harlow are reduced.
- Any development required outside Harlow's boundaries is suggested to be located to north, the closest area to the transport hubs (train stations and town centre bus interchange).
- If 15,000 dwellings are required then further development to the north is suggested.



Harlow's Local Development Plan

Example 4 – Regeneration and Landscape Led

- Future development seeks to balance landscape impacts and achieving regeneration of urban area.
- Providing additional residential development as part of redevelopment of town centre and Neighbourhood centres.
- Development to the north is suggested if 15,000 dwellings are required.

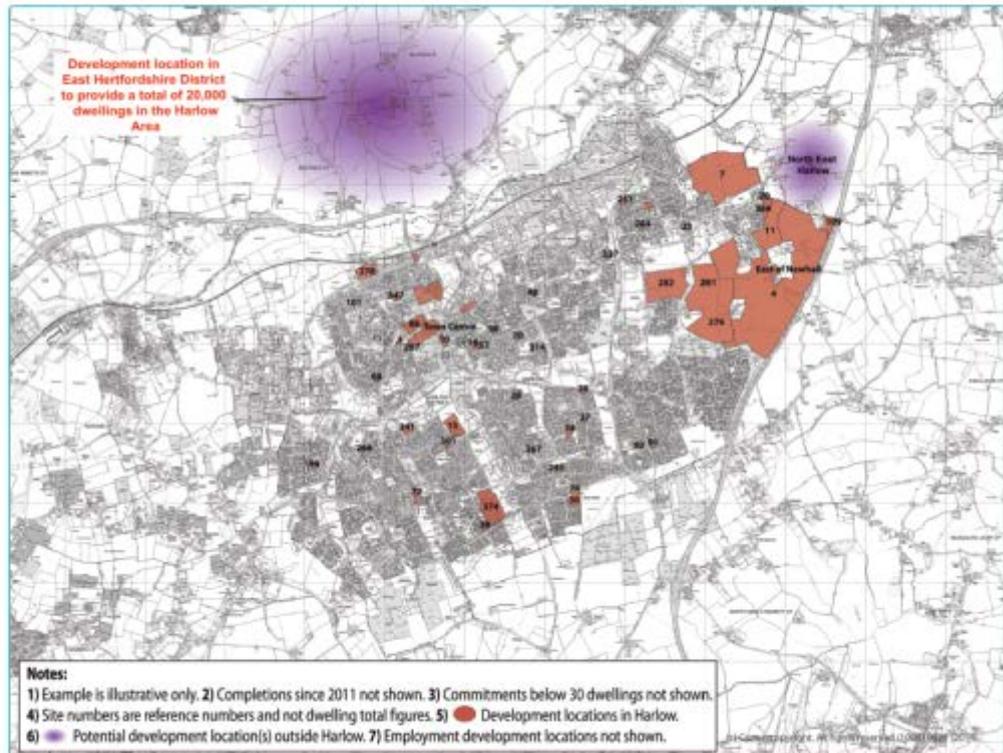


The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Harlow's Local Development Plan

Example 5 – Northern Bypass Led

- Provides for 20,000 dwellings across the Harlow Area.
- Focuses future investment in areas more likely to support a new northern bypass to Harlow.
- Development is also provided closer to passenger transport hubs (train stations and town centre bus interchange).
- Less development to be located in the south of Harlow.



The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Harlow's Local Development Plan

Appendix 14: Exhibition photos

Staffed exhibition, St John's ARC, 6 May 2014



Staffed exhibition, Latton Bush Centre, 14 May 2014



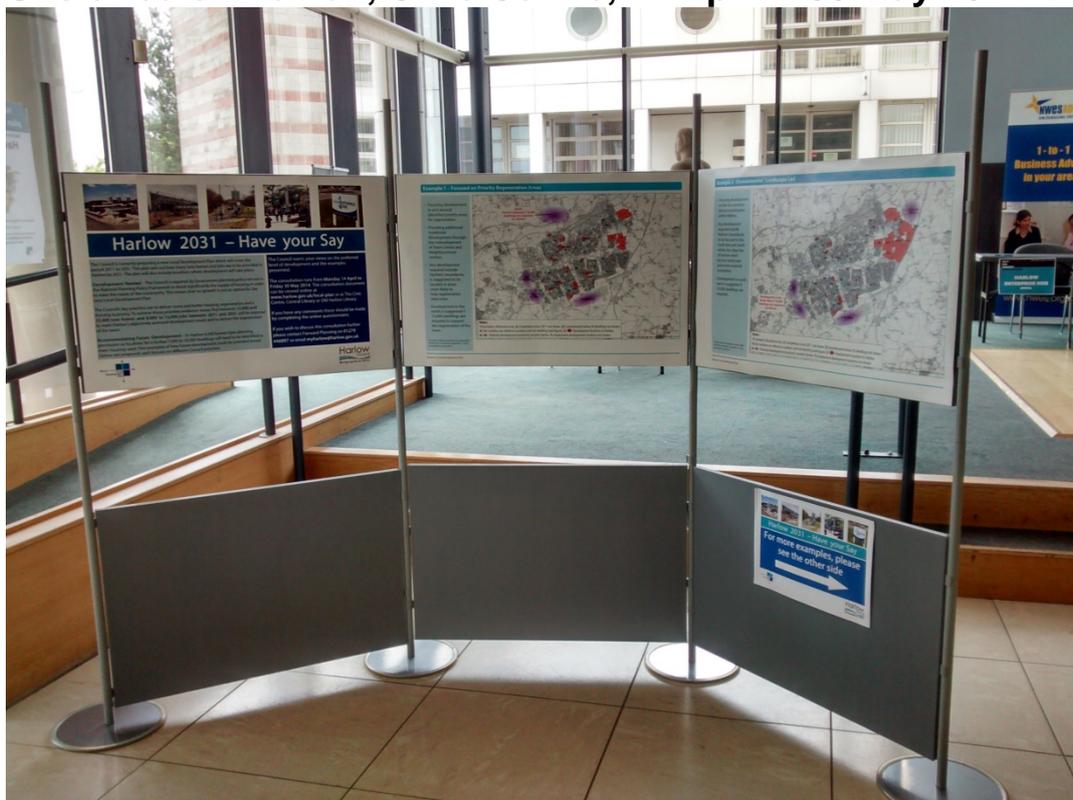
- 111 -

Harlow Local Development Plan: Emerging Strategy & Further Options
Consultation Summary Report

Staffed exhibition, Harvey Centre, 21 May 2014



Unstaffed exhibition, Civic Centre, 14 April – 30 May 2014



Unstaffed exhibition, Harlow Central Library, 22 to 30 May 2014

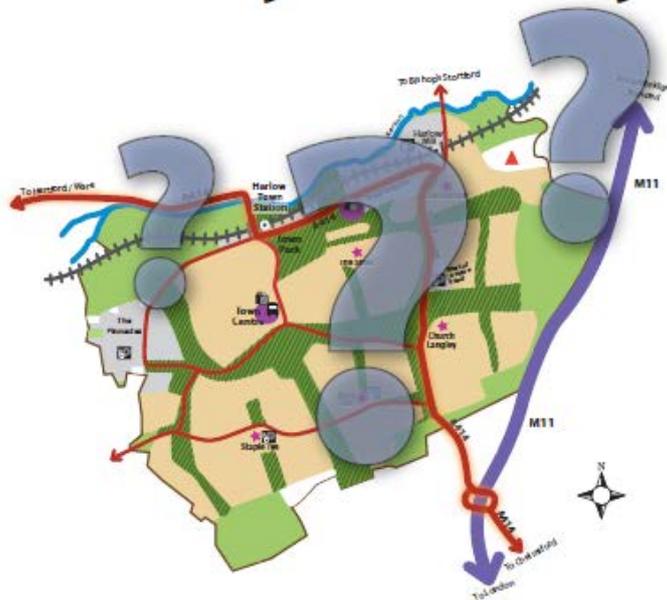


Appendix 15: Window poster in Civic Centre

How would YOU plan Harlow's future?

Harlow's Local Development Plan

Have your say!

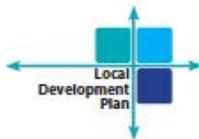


Emerging Strategy and Further Options Consultation

14 April 2014 to 30 May 2014

View the consultation document, pick up a questionnaire
and see the exhibition in the reception area, or visit

www.harlow.gov.uk/local-plan



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Harlow Local Development Plan: Emerging Strategy & Further Options
Consultation Summary Report

Appendix 16: Website banner



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Harlow's Local Development Plan -
Consultation open 14 April to 30 May 2014

[1](#) [2](#) [3](#) [4](#) [5](#)

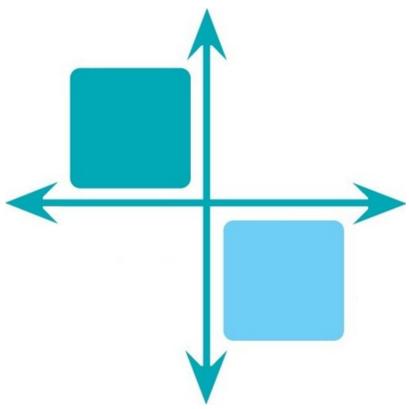
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Find out the latest

[Events](#)

Respondent List

. Pauline Black [8430]
Anglican Deanery of Harlow (Revd Martin Harris) [8345]
Barton Willmore (Miss Emma Gladwin) [8399]
Countryside Properties Plc [70] represented by Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]
Dr Roger Bamford [8442]
EFA (Dr Douglas McNab) [8404]
Elaine Allen [6031]
Environment Agency (Miss Lisa Mills) [8443]
Essex Bridleways Association (Mrs Sue Dobson) [7887]
Essex County Council (Mr Rich Cooke) [8452]
Harlow Civic Society (Mr John Curry) [5318]
Highways England (Mr Mark Norman) [7939]
Historic England (Ms Katie Parsons) [8441]
Home Builders Federation (Mr Mark Behrendt) [8450]
Home Group (Jessica Watts) [8445]
Janet Watkins [6004]
Jean Wright [5878]
Lichfields (Mr Harry Bennett) [8454]
Miller Homes [8449] represented by Andrew Martin - Planning (Mr Olivier Spencer) [8448]
Miss Sally SallyAnn Simpson [8418]
Morley Grove Residents Association (Sheila Sullivan) [5043]
Mr & Mrs Andy & Janice Gee [8438]
Mr Andrew Whybrow [8423]
Mr Gary Roberts [8432]
Mr Simon Burton [8439]
Mrs Giulia Festa-Burton [8436]
Ms Sue McDonald [8446]
Natural England (Mr Jamie Melvin) [8440]
Persimmon Homes (Mr David Moseley) [8437]
Quod Planning (Mr Philip Murphy) [7958]
Roydon Parish Council (Janet Ballard) [5434]
Sport England (. Laura Hutson) [8431]
Thames Water (Savills) (Mr Chris Colloff) [8433]
The Roydon Society (Miss Nicola Wilkinson) [27]
The Theatres Trust (Tom Clarke) [216]



Harlow Local Plan

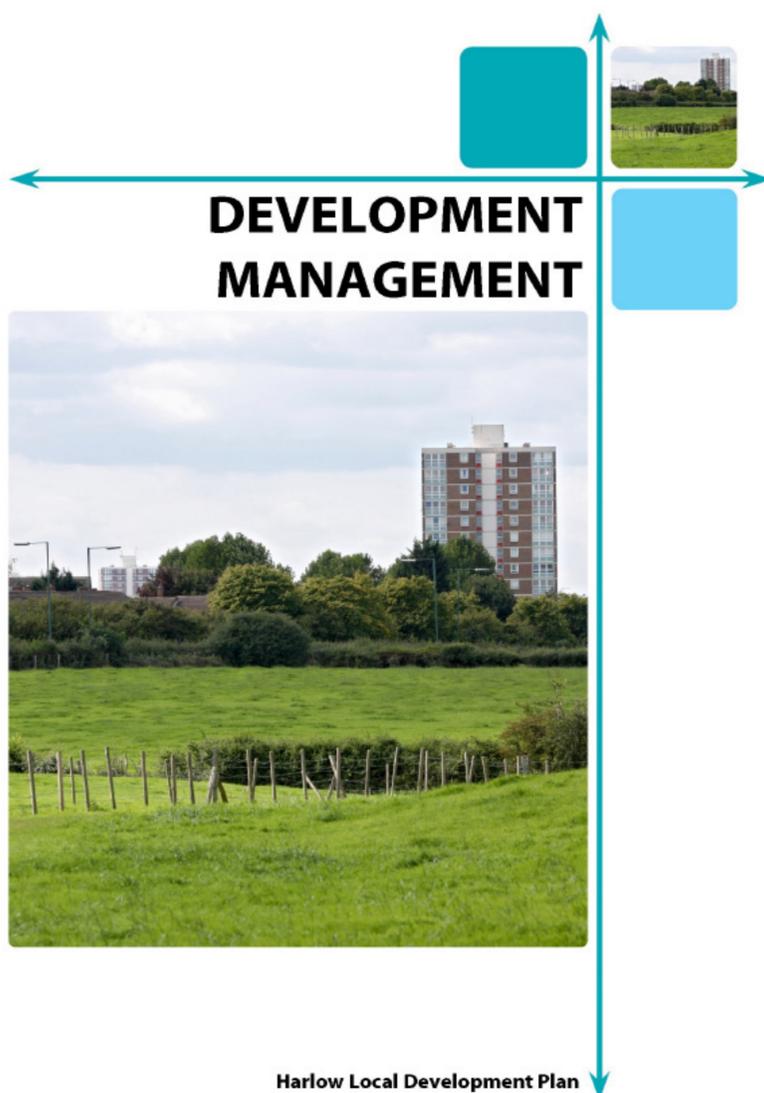
CONSULTATION

Development Management Policies

The new Local Development Plan for Harlow will contain Strategic Policies which provide an overarching development framework for the town, supported by Development Management Policies which provide more detailed planning guidance.



These policies will be accompanied by a Policies Map.

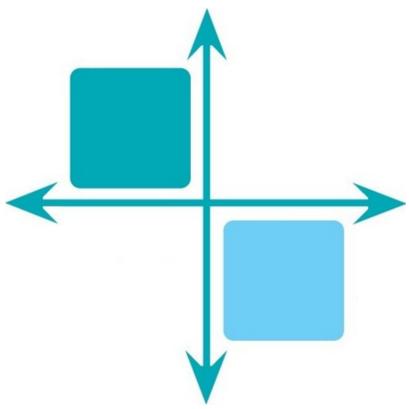


We are now consulting on the **Development Management Policies** that will help deliver the Plan's Strategic Objectives, which are split into five themes:

- Placeshaping
- Housing
- Prosperity
- Lifestyles
- Infrastructure

Please respond by 7 September 2017

www.harlow.gov.uk/local-plan



Harlow Local Plan

CONSULTATION

Development Management Policies

Local Plan Strategic Objectives

PLACESHAPING

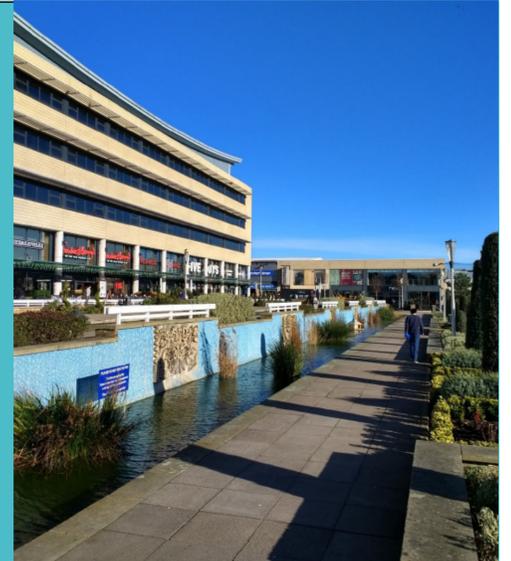
- Establish quality streets which connect to revitalised green spaces
- Deliver high quality design through new development whilst protecting the district's heritage
- Adapt to and mitigate the impacts of climate change

HOUSING

- Identify sites to meet local housing needs both now and in the future
- Provide a range of suitable housing for the community including a range of tenures and types

PROSPERITY

- Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates
- Meet the employment needs of the district by diversifying and investing in the district's employment base
- Secure economic revitalisation and reinforce Harlow's reputation as a key centre for Research and Development
- Improve educational opportunities & the skills base of locals
- Provide a range of shopping needs for local residents and wider sub-region by regenerating the town centre and protecting and enhancing neighbourhood centres and hatches



LIFESTYLES

- Provide & enhance sporting, leisure, recreational facilities & cultural opportunities

INFRASTRUCTURE

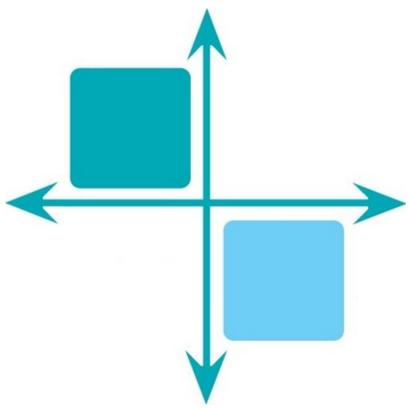
- Ensure development is fully supported by providing necessary infrastructure including education, healthcare & other community facilities
- Reduce the need to travel by car by ensuring new development is sustainably located
- Improve transport links, for all modes of transport, to community facilities
- Enhance & promote the role of Harlow as a transport interchange along the M11



Please respond by 7 September 2017

www.harlow.gov.uk/local-plan

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Harlow Local Plan

CONSULTATION

Development Management Policies

The Council is now consulting on the Development Management Policies document and wants to hear your views.

The document can be viewed and comments submitted at www.harlow.gov.uk/local-plan

Please ensure you submit comments by 5pm on 7 September 2017.

The document can also be viewed at the Civic Centre Reception, Harlow Central Library and Old Harlow Library. Comments can alternatively be posted to Forward Planning, Harlow Council, Water Gardens, Harlow, Essex, CM20 1WG, or emailed to myHarlow@harlow.gov.uk.

Please ensure you include your name and address when responding, as we cannot accept anonymous comments.

By responding, you are giving your consent to the Council to hold and process your personal data in accordance with the requirements of the Data Protection Act 1998. Your name, organisation and comments may be available for others to view at the Council's offices and on the Council's website, but confidential information such as your address will remain confidential. The data gathered through this consultation will be held for the duration of the Local Plan, up to and probably beyond 2033. When you respond, we will add you to the Local Plan Database, so you can be kept informed of consultations on the Local Plan and other Planning Policy documents. You will be emailed rather than being contacted by post, unless you tell us otherwise or do not provide an email address. If you are already on the database, your details will not be duplicated. If you do not want to be added to the database, or are already on it and want to be removed, please tell us when you respond to the consultation.

Harlow Local Plan CONSULTATION

Development Management Policies

The new Local Development Plan for Harlow will contain Strategic Policies which provide an overarching development framework for the town, supported by Development Management Policies which provide more detailed planning guidance.

These policies will be accompanied by a Policies Map.

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- Placeshaping
- Housing
- Prosperity
- Lifestyles
- Infrastructure

Please respond by 7 September 2017
www.harlow.gov.uk/local-plan



Harlow Local Plan CONSULTATION

Development Management Policies

Local Plan Strategic Objectives

PLACESHAPING

- Create high quality streets which connect residential areas
- Create high quality streets which provide a range of housing types
- Create high quality streets which provide a range of housing types

HOUSING

- Identify sites to meet local housing needs both now and in the future
- Provide a range of suitable housing for the community including a range of tenured types

PROSPERITY

- Improve the quality of life in the district through new developments, improved transport and public services
- Make the employment sector of the district by diversifying and expanding the district's economic base
- Increase the number of jobs and businesses in the district as a key driver for Prosperity and Development
- Provide a range of housing needs for local residents and wider catchment for employment, leisure and shopping and enhancing neighbourhood settings and health

LIFESTYLES

- Provide a balanced offering between recreational facilities & cultural opportunities

INFRASTRUCTURE

- Ensure development is fully supported by providing necessary infrastructure including education, healthcare & other community facilities
- Reduce the need to travel by car by providing new development in walkable locations
- Provide transport links for all modes of transport to improve the quality of life
- Enhance the role of Harlow as a transport hub

Please respond by 7 September 2017
www.harlow.gov.uk/local-plan



Harlow Local Plan CONSULTATION

Development Management Policies

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Robbers threaten shop staff

THREE men stole mobile phones and a five-figure sum of cash after threatening shop staff.

The men, wearing balaclavas, went into EE, in Edinburgh Way, Harlow, at about 4pm on Tuesday afternoon (July 25) and ordered workers to the shop's rear.

They then took phones, money and electrical appliances before driving away in a Volkswagen Golf. No one was injured.

Essex Police are appealing for information after the robbery.

One suspect is described as being white, about 6ft 2 ins with facial hair and wore a black and white striped hoodie.

The other suspects have been described as being black men, aged in their 20s and about 5ft 5ins tall.

They both wore black hoodies while all three wore gloves.

Anyone with information is asked to call Harlow Police Station on 101 or Crimestoppers, anonymously, on 0800 555 111.

Delays on M11 after blowout

MOTORISTS faced delays on the M11 southbound from junction at 8 Bishop's Stortford to junction 7 for Harlow.

Slight disruption was caused after a vehicle's part-worn tyres blew out on Saturday (July 22).

Essex Police sergeant Colin Shead posted pictures of the tyres on Twitter which were taken by PC Michelle Lockyer.

He wrote that a female driver has been reported to court as she already had 14 points on her licence.

The car passed its MOT in May but the driver purchased part-worn tyres as a replacement.

Drivers using the section faced delays of no more than five minutes.

Chance to have your say on council's master plan

Consultation on future planning guidelines which will shape area

By William Mata

william.mata@hertsexnews.co.uk

HARLOW Council is inviting residents and businesses to have their say on how planning applications are considered.

The consultation is a precursor to the authority's local plan, planning guidelines that will shape the town's development up to 2033 and include policy on housing, infrastructure, the environment, services and support.

A replacement for Princess Alexandra Hospital could be on the cards while Harlow Council must fulfil a requirement to build 9,200 homes.

Councillor Danny Purton said: "This consultation is an important part of the local development plan.

Aspirations

"If we want to continue improving Harlow, providing much-needed housing and employment and creating new opportunities for local people and businesses, then we need a local development plan which supports Harlow's development, aspirations and growth for the future."

As neighbouring councils have already submitted a local plan, the announcement is a step forward for the local authority.

Policy is also expected to be shaped around major projects such as Harlow Enterprise Zone and Public Health England's campus in the town.

Mr Purton added: "As we plan



Residents can read the proposals at a number of sites around town, including Harlow Civic Centre. Inset, Councillor Danny Purton

Harlow's future, the council will be making sure that Harlow has the right mix of new homes, business spaces, shops, education, health and leisure facilities to meet the needs of residents and businesses.

"We will also provide protection for the green spaces and the environment by making sure that

new buildings respect Harlow's new town heritage and any traffic implications are minimised.

"The development management policies support all these things by providing guidance on how planning applications will be assessed."

Consultation on the proposed policies runs until 5pm on

Thursday, September 7.

The complete local plan will be published for further consultation and submitted to the secretary of state for examination in 2018.

To comment visit www.harlow.gov.uk/local-plan email comments to myharlow@harlow.gov.uk or post comments

to The Forward Planning Team, Harlow Council, Water Gardens, Harlow, Essex, CM20 1WG.

The proposed policies can be read at www.harlow.gov.uk/local-plan. Or they can be viewed, during normal opening hours, at the Harlow Civic Centre, the Harlow Central Library and Old Harlow Library.

 **BREAKING NEWS ON OUR WEBSITE**

For breaking news from across the area

harlowstar.co.uk

Consultation over plan for new garden town

PROPOSALS to build a new garden town called Gilston Park, also colloquially known as Harlow North, will be put to consultation by East Hertfordshire District Council (EHDC).

The consultation, which started on Monday (July 24), will run until September 1.

Residents are being asked to give their views on plans for a new town being

proposed for Gilston.

The town, which is part of the East Hertfordshire District Plan, would include 10,000 homes, provision for schools, health care, parks, and transport links.

The consultation, which is taking place after the publication of the concept framework document, gives the public the chance to look at the first detailed plans

for the settlement.

To view the documents and to give feedback visit www.eastherts.gov.uk/gilstonconsultation

Developers will also be holding a drop-in session on August 5, from 10am until 3pm, at Manor of Groves Hotel in Sawbridgeworth, CM21 0JU for people to see plans and to give their opinions in person.

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Development Management Policies Consultation Draft

CHAPTER: Development Management in Harlow Development Management in Harlow
Harlow

6219 Comment **Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]** **Agent: N/A**

Summary:

General Comments

Thames Water are in discussion with Harlow and neighbouring authorities with regard to long term growth and infrastructure issues with the Rye Meads Sewage Treatment Works catchment and these discussions are ongoing. Hydraulic modelling is currently taking place of the sewer network and a position statement was issued in June 2017 in relation to the position with regard to the sewer network and sewage treatment.

Change To Plan:

Full Reference: C - 6219 - 8433 - Development Management in Harlow - None

6265 Comment **Respondent: Natural England (Mr Jamie Melvin) [8440]** **Agent: N/A**

Summary: Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

In general, Natural England considers the development management policies provided to be relatively comprehensive. Your authority is aware that the West Essex/East Hertfordshire Housing Market Area Local Planning Authorities including yourselves, along with Essex County Council, Natural England and the Conservators of Epping Forest are all signatories to a Memorandum of Understanding relating to Epping Forest Special Area of Conservation (SAC). As that project progresses and following the undertaking of Habitat Regulations Assessment (as required under section 102 of the Conservation of Habitats and Species Regulations 2010) further amendments to the policies may be necessary.

Change To Plan:

Full Reference: C - 6265 - 8440 - Development Management in Harlow - None

6271 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: 1.0 INTRODUCTION

1.1 These representations have been prepared on behalf of De Merke Estates in response to Harlow District Council's (HDC's) Regulation 18 consultation on its Draft Development Management (DM) Policies.

1.2 HDC is in the process of producing a new Local Plan, which will contain Strategic Policies to provide an overarching development framework for the town, supported by DM Policies which contain more detailed planning guidance. These policies will be accompanied by a Proposals Map.

1.3 An initial Issues and Options consultation was undertaken between 22 November 2010 and 28 January 2011, followed by an Emerging Strategy and Further Options consultation between 14 April and 30 May 2014.

1.4 This has been followed by the current DM Policies consultation. HDC's timetable for the remainder of the Local Plan is as follows:

* Regulation 19 Consultation: January-February 2018

* Submission: April 2018

* Examination: Summer 2018

* Inspector's Report: August 2018

* Adoption: September 2018

1.5 These representations will highlight concerns with HDC's process of adopting the new Local Plan, concerns with specific policies and seek to promote our Client's Site for development.

Change To Plan:

Full Reference: C - 6271 - 8399 - Development Management in Harlow - None

Summary:

2.0 LOCAL PLAN PROCESS

2.1 Firstly, on behalf of our Client we wish to raise concerns regarding the Local Plan process that HDC is following.

i) Separation of Strategic and DM Policies

2.2 The process for producing a new Local Plan is detailed in The Town and Country Planning (Local Planning) (England) Regulations 2012, the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

2.3 All three of these documents detail that the plan making process is a collaborative one that requires engagement with statutory consultees, local residents, local businesses and all other parties that have an interest in the Local Plan.

2.4 This engagement must start at an early stage, as identified in Paragraph 155 of the NPPF which states that 'early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential'. It continues to state that Local Plans should 'reflect a collective vision and a set of agreed priorities for the sustainable development of the area'.

2.5 This is reiterated in the PPG, stating that Local Authorities must identify and engage at an early stage with all those who may be interested in the Local Plan, and must take into account all representations made and will need to set out how these have been taken into account (Reference ID: 12-010-20140306).

2.6 HDC first engaged with the local community and statutory consultees in 2010 with the Issues and Options consultation, starting engagement at an early stage. This was followed in 2014 by the Emerging Strategy and Further Options consultation.

2.7 Whilst these consultations did allow HDC to engage with the local community and consultees, these documents asked for their opinion on issues within the Harlow area and on a number of different options on various issues, including how development could be allocated.

2.8 These previous consultations did not provide any specific policies or incorporate any decision over the scale and distribution of development across Harlow and did not include a proposals map.

2.9 The Emerging Strategy and Further Options consultation itself stated 'the preferred option will be presented later this year / early next year before the plan undergoes public examination'.

2.10 However, no preferred options for the scale and distribution of development or draft proposals map have been presented.

2.11 The current consultation comprises the DM Policies only, which provide a detailed planning framework to be used in determining planning applications. These policies have been developed to help deliver the Local Plan's strategic objectives, which have been grouped into 5 No. themes and comprise 14 No. specific objectives.

2.12 However, these strategic objectives form part of the Strategic Policies aspect of the new Local Plan, and whilst these are listed within the current consultation there is no further detail given and limited opportunity to comment as a result.

2.13 Furthermore, the DM Policies refer to the strategic policies in some instances, particularly in relation to housing need and the distribution of development. No detail regarding this is given, with Policy H1 stating 'development of the Strategic Housing Site and other sites for housing (allocated in the Strategic Policies) will be supported. Development of the Strategic Housing Site will require a Master Plan to be submitted which takes into consideration the relevant policies in the Local Plan'.

2.14 The justification for Policy H1 states the housing requirement is set out in the Strategic Policies, with no other detail given.

2.15 To date there have been no documents published that identify HDC's preferred option for the scale and distribution of development. Various options have been published for consultation, but no details of any assessment or decisions that have been made.

2.16 The DM Policies suggest that decisions in this regard have been made, referring to 'the Strategic Housing Site'. However, any indication of where this will be and what this development will comprise is not available.

2.17 As detailed above, HDC is intending to publish only the DM Policies as the Regulation 18 Plan, with a full Local Plan comprising both the Strategic and DM Policies published as a Regulation

19 Plan in January 2018.

2.18 The remit to respond to a Regulation 19 Plan is quite limited, concentrating on the four Tests of Soundness and whether the Local Plan is compliant with relevant legislation.

2.19 As such, the PPG is clear that the Regulation 19 Plan 'should be the document that the Local Authority considers ready for examination' (Reference ID: 12-020-20140306). The content of the document should have already been consulted upon, with changes made as necessary.

2.20 There are substantial concerns that following the approach of only publishing the Strategic Policies and proposed development strategy as a Regulation 19 consultation will result in a Local Plan that fails to meet the legal requirement of having undertaken the necessary consultation and adequately considered the representations.

2.21 Furthermore, HDC is anticipating submitting the Local Plan for examination in April 2018, which does not provide any time to make amendments to the Local Plan and re-consult between the Regulation 19 consultation and submission.

2.22 Given that the Regulation 19 consultation will be the first publication of HDC's preferred strategy and strategic policies, it is highly likely that a considerable number of representations will be made. HDC has a statutory duty to consider these and, when submitting the Local Plan for examination, must identify how they have considered them and amended the Plan where necessary.

2.23 The current timetable and approach of HDC suggests that HDC is not anticipating amending the Plan following the Regulation 19 consultation. The more common approach is to undertake a Regulation 18 consultation on the whole draft Local Plan including the preferred strategy for development, making the necessary amendments, publishing the Regulation 19 Local Plan and then submitting to the Planning Inspectorate. This process adequately allows for genuine consultation on the Plan and preferred strategy, providing the collaborative approach required.

ii) Evidence Base

2.24 A Local Plan must be based on 'adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area' (NPPF Paragraph 158).

2.25 The PPG further states that an appropriate and proportionate evidence base is essential for producing a sound Local Plan and 'the evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively' (Reference ID: 12-014-20140306). The PPG continues to state if approaching submission and key studies are reliant on information that is a few years old, they should be updated.

2.26 As HDC has been in the process of producing the new Local Plan for over 10 years, the age of the evidence base documents varies, with some having been published prior to 2010.

2.27 The most recent Infrastructure Study was published in 2009, the SHLAA was undertaken in 2014 and the Employment Land Review was undertaken in 2013.

2.28 Furthermore, the SHMA was published in 2013 considering the 2012-based household projections and those from preceding years. The 2014-based household projections were published last year and it is unclear whether HDC has considered these.

2.29 There are concerns over the robustness of the evidence base for the new Local Plan, with some documents being out-of-date and others not having been published.

iii) Sustainability Appraisal

2.30 The PPG details that every Local Plan must be informed and accompanied by a Sustainability Appraisal (SA) to allow 'the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives.' (Reference ID: 12-016-20140306).

2.31 HDC produced and consulted on a SA Scoping Report, with the final version published in February 2010.

2.32 The SA Scoping Report sets out that 'crucially, the appraisal should be undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan. In practice, this means undertaking several rounds - or iterations - of appraisal at different stages in the plan-making process' (Paragraph 2.2.3).

2.33 The options presented in the Issues and Options consultation document were considered against the SA criteria, with a SA published alongside the consultation in November 2010.

2.34 The Issues and Options SA set out the assumptions and difficulties in undertaking certain parts of the appraisal at that stage, including that there were no specific details on the suggested approach to the overarching principles directing new development and the exact level and type of employment to be provided was unclear.

2.35 Furthermore, there were no details on the locations where densities could be increased, whether undeveloped and underused open spaces should be used for development before the Green Belt, and what role Green Wedges should play in the future development of Harlow.

2.36 The SA Scoping Report sets out that as such, the likely significant effects of these options could not be appraised at that stage, which is not uncommon for an Issues and Options paper. It continues to state that 'however, it is important that future iterations of the Core Strategy are clearer on the approach so to allow the Sustainability Appraisal to appraise their impact' (paragraph 2.3.18).

2.37 Further uncertainties were identified regarding the impact of the spatial options against the SA framework, mainly due to a lack of detail regarding the nature of the development for each option. Greater detail on the exact nature and geographical steer in terms of infilling within existing development would be required to enable a full assessment of the spatial options against the SA framework. Although proposed policy areas were identified, details were not provided at that stage, with these details highlighted as 'instrumental in the determination and identification of sustainability impacts'.

2.38 A SA is a statutory requirement to accompany a Local Plan which should be used throughout its development to ensure the Local Plan reflects the sustainability objectives and promotes sustainable development in accordance with the NPPF.

2.39 Whilst HDC produced a SA Scoping Report and a SA to accompany the Issues and Options consultation, there has been nothing further published since 2010 in this regard.

2.40 As detailed above, if HDC had published the full Local Plan as part of the Regulation 18 consultation, a SA report could have been published alongside. Instead, the first full SA report will have to be published alongside the Regulation 19 consultation, allowing limited opportunity for comments and amendments.

868

Change To Plan:

Full Reference: C - 6272 - 8399 - Development Management in Harlow - None

6273 Comment

Respondent: Barton Willmore (Miss Emma Gladwin) [8399]

Agent: N/A

Summary: PROMOTION OF SITE

See attached file.

Change To Plan:

Full Reference: C - 6273 - 8399 - Development Management in Harlow - None

6274 Comment

Respondent: Historic England (Ms Katie Parsons) [8441]

Agent: N/A

Summary: As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the draft development management policies. We have now had the opportunity to review the documents and can provide the following substantive comments.

General comments

Historic England has published a number of Good Practice Advice and Advice Notes which you may find useful in developing your local plan. In particular:

Good Practice Advice in Planning 1 - the historic environment in local plans:

<<https://historicengland.org.uk/images-books/publications/gpa1-historic-environmentlocal-plans/>>

Good Practice Advice in Planning 3 - the setting of heritage assets:

<<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-ofheritage-assets/gpa3.pdf/>>

For the avoidance of doubt, we have not considered archaeological issues in this brief desk based assessment but would refer you to the HER who should be able to advise in this regard. We have also not identified non-designated assets.

Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.

A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands. Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.

A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.

Further opportunity should be sought to address the historic environment in every aspect of the Plan and to make the strategy more spatially specific and unique to Harlow.

Change To Plan:

Full Reference: C - 6274 - 8441 - Development Management in Harlow - None

6291 Comment Respondent: **Historic England (Ms Katie Parsons) [8441]** Agent: **N/A**

Summary: Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that the above comments of assistance.

Change To Plan:

Full Reference: C - 6291 - 8441 - Development Management in Harlow - None

6297 Comment Respondent: **Dr Roger Bamford [8442]** Agent: **N/A**

Summary: The document is well laid-out, clear and professional. However it is very disappointing that the council has not yet published the strategic policies. It is most peculiar that the more detailed development management policies have been published first. The council is treading on dodgy ground by not having a 'preferred options' consultation. I, for one, will object to the soundness of the plan if we are not allowed to comment on preferred options.

Change To Plan:

Full Reference: C - 6297 - 8442 - Development Management in Harlow - None

6303 Comment Respondent: **EFA (Dr Douglas McNab) [8404]** Agent: **N/A**

Summary: Submission of the Education and Skills Funding Agency
1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. The ESFA, launched on 1st April 2017, brings together the existing responsibilities of the Education Funding Agency (EFA) and the Skills Funding Agency (SFA) to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for £61 billion of funding a year for the education and training sector, including support for all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.
3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the ESFA is the delivery body for many of these, rather than local education authorities. As such, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.

Change To Plan:

Full Reference: C - 6303 - 8404 - Development Management in Harlow - None

6307 Comment Respondent: **Miller Homes [8449]** Agent: **Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: In summary, our client requests that all future consultations present the Local Plan as a whole.

Change To Plan:

Full Reference: C - 6307 - 8449 - Development Management in Harlow - None

6308 Comment**Respondent: Jean Wright [5878]****Agent: N/A**

Summary: Having commented in previous years on the Local Plan I was left, after looking at the document, feeling disappointed as this is a policy document with no detail. It is the briefest of documents.
As a resident I feel none the wiser about Harlow's future development.
I feel unable to comment.

Change To Plan:

Full Reference: C - 6308 - 5878 - Development Management in Harlow - None

6323 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: a) Gilston Area
As the Council will be aware Places for People, alongside City & Provincial Properties, are working with East Herts District Council (EHDC) to secure an allocation for 10,000 homes at the Gilston Area. The Gilston Area is currently identified as a Site Allocation in the Pre-Submission draft of the East Herts District Plan (November 2016). This was submitted to the Secretary of State on 31 March 2017 and the independent examination is due to start on 3 October 2017.
As recognised in the evidence base to the EHDC District Plan, the Gilston Area will provide a full range of residential properties, both private and affordable, to assist in meeting the housing needs of East Herts, and also contributes toward the economic regeneration of Harlow.
Paragraph 11.1.3 of the draft EHDC District Plan states "As well as providing benefits to East Herts, the development will support the regeneration of Harlow by helping to draw investment to the town and enhance its economic performance."
In delivering the Gilston Area development, Places for People are keen to support the regeneration of Harlow. This will include the indirect benefits of growth at the Gilston Area (e.g. investment and spending from the residents of the 10,000 homes being drawn into Harlow), and there will also be direct benefits in the form of highway improvements including the proposed Central and (likely Eastern) Stort Crossings.
Detailed designs for the crossings are currently being prepared by Places for People in consultation with the two county highway authorities. These enhancements will deliver significant strategic improvements to the transport network across the greater Harlow area, and directly assist Harlow's wider aspirations for residential and economic growth.
In order to correctly reflect the published evidence base, as well as have due regard to the advanced progress of the East Herts District Plan, the Development Management Policies document should specifically recognise the role and importance of the Gilston Area in supporting the Local Plan's strategic objectives, especially those set out in the Prosperity chapter.

Change To Plan:

Full Reference: C - 6323 - 7958 - Development Management in Harlow - None

6329 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Places for People welcome the opportunity to continue to engage with Harlow District Council on the evolution of Harlow's Local Development Plan, particularly as the detail on the proposals for the Gilston Area, and Central and Eastern Stort Crossings, continues to progress.

Change To Plan:

Full Reference: C - 6329 - 7958 - Development Management in Harlow - None

6333 Comment**Respondent: Countryside Properties Plc [70]****Agent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]**

Summary: In reviewing the policies proposed there is some concern that the evidence base is now significantly dated and in many instances pre-dates the National Planning Policy Framework (NPPF), such that the position established lacks any clarity or weight to enable a developer to reasonably establish the policy requirements prior to the submission of a planning application.

Change To Plan:

Full Reference: C - 6333 - 70 - Development Management in Harlow - None

701

6338 Comment **Respondent: Home Group (Jessica Watts) [8445]** **Agent: N/A**

Summary: Home Group wishes to express support of the Draft Development Management Policies document Harlow has issued as part of the Local Plan. We believe the policies show a generally positive and practical attitude, and as a developer partner active in the district, we welcome any approach that encourages sustainable housing developments and promotes good design principles. We also advocate the focus on preserving heritage and the natural environment whilst being pragmatic about the potential for open space development where appropriate.

Change To Plan:

Full Reference: C - 6338 - 8445 - Development Management in Harlow - None

6344 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: It is assumed that a statement will be inserted into the introduction of the final Plan clarifying that all development plan policies, including those found in the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan, will apply in the administrative area of Harlow, and that the Plans and their policies apply as a whole.

Potential Policy Omission

Reference is made to the NPPF as requiring developments to have a social role and support developing strong, vibrant and healthy communities. There is, however, no health and wellbeing policy within this document. This could possibly be included as part of Policy PL1, or it may be that such a policy would form part of the over-arching strategic Local Plan policies, that are yet to be published. If that is the case, ECC advises and reminds HDC not to overlook that consideration as key throughout the plan and its objectives. In the latter respect, it is noted that there is currently no Local Plan objective that specifically covers health and wellbeing.

In addition, ECC actively encourages the adoption of Health Impact Assessments in line with the existing Essex Planning Officers Association 2008 guidance, which will be updated. ECC also signposts to Public Health Guidance from colleagues at Herts County Council Public Health team, which can be found here- <https://www.hertfordshire.gov.uk/media-library/documents/public-health/hertfordshire-s-health-and-wellbeing-planning-guidance-may-2017.pdf>. The Harlow DM policies could usefully include a policy requirement for HIAs to be prepared for development proposals.

Change To Plan:

Full Reference: C - 6344 - 8452 - Development Management in Harlow - None

702 **6345 Comment** **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: Paragraph 1.2
The reference to 'national policies' could be made clearer by referring instead specifically to the National Planning Policy Framework.

Paragraph 1.3

This reference to 'strategic policies of the Local Plan could be made clearer by referring instead to the new Local Plan, in order to avoid any confusion with the old, previous Local Plan. NB This also applies to paragraph 2.5.

Paragraph 1.4

There is a lack of substantial references to Passenger Transport within the Policy Objectives and DM Policies. There are only two objectives which offer any suggestion of support for sustainable modes generally or Public Transport specifically. Neither of these however go into sufficient even high level detail to demonstrate that the HDC Plan is intent on encouraging and incentivising bus travel in particular. Objective 13 refers to "reducing the need to travel by vehicle, by locating new developments sustainably", whilst Objective 14 speaks of "improving transport links for all modes, to transport community facilities".

Change To Plan:

Full Reference: C - 6345 - 8452 - Development Management in Harlow - None

6384 Comment **Respondent: Lichfields (Mr Harry Bennett) [8454]** **Agent: N/A**

Summary: We write on behalf of our client, Mulberry Developments (Harlow) Ltd ("Mulberry Developments"), in relation to the above consultation.
Mulberry Developments is grateful for the opportunity to comment and we provide our comments on the draft Development Management Policies document within this letter of representation.
Mulberry Developments is the owner of the former GSK South Site, Third Avenue, Harlow. Mulberry Developments bought the site, located within the Pinnacles Industrial Estate, following its purchase from GSK in December 2016.
The site is currently subject to an outline planning application (ref. HW/OUTAM/17/00246) seeking to erect up to 46,916 sq.m (GIA) of Class B8 floorspace.
More generally, Mulberry Developments is a multidisciplinary development company based in Northamptonshire that specialises in both commercial and residential sectors. Since 2005, they have delivered over 2 million sq ft. of commercial development across the country.

Change To Plan:

Full Reference: C - 6384 - 8454 - Development Management in Harlow - None

6389 Comment **Respondent: Roydon Parish Council (Janet Ballard) [5434]** **Agent: N/A**

Summary: The Gibberd principles should continue to apply.

Change To Plan:

Full Reference: C - 6389 - 5434 - Development Management in Harlow - None

6195 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: Protection of already "in place" housing needs attention,not just for new developments;that is,the town needs new signage everywhere, not just for new developments like "Atelier" for instance. Street signage & housing designations all need to be consistent, in many instances they are damaged or displaced or have disappeared altogether. To maintain & protect Gibberd's vision, the town needs an upgrade in all signage,not just for traffic flow/directions, but more importantly for the various housing areas, eg Peterswood, Long Banks, St Katherines, Latton Bush, just about everywhere. At present, it is an inconsistent mess-this is not being addressed.

Change To Plan:

Full Reference: C - 6195 - 8418 - Placeshaping - None

6214 Comment**Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]****Agent: N/A**

Summary: Agree with protection of green areas including the Green Belt and maintaining the trees and hedges.

Support the continued protection and enhancement of biodiversity and geodiversity.
Supportive of the Gibberd Masterplan to improve the natural environment, creating additional wildlife habitats and reinforce existing green links.

We expect any new green infrastructure to be well planned and effectively managed in the future, especially in times of reduced budgets.

In view of additional vehicles - minimize and reduce all forms of pollution and contamination.

All new dwellings to be water efficient and have the facility for rainwater harvesting. Using no more than 110 litres/day is optimistic.

Maintain all heritage assets and their environs.

Change To Plan:

Full Reference: C - 6214 - 27 - Placeshaping - None

6224 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: 6 Local Plan Strategic Objectives: Objective 1 is to 'Create and enhance high quality built environments which are well connected to revitalised green spaces'. This we do not object to, but we feel that recreational access to all green spaces for all user groups is important and should be reflected within Harlow's key objectives. We therefore suggest that the wording should be amended to read 'Create and enhance high quality built environments which are well connected to revitalised fully accessible green spaces'.

Change To Plan:

Full Reference: C - 6224 - 7887 - Placeshaping - None

6283 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: We welcome the reference to the historic environment in paragraph 2.1 of the supporting text. Paragraphs 2.2 and 2.3 helpfully go on to concisely explain the character and nature of Harlow's New Town heritage, and highlight the importance of non-designated buildings and structures which are of local interest which contribute to the distinct character and heritage of the area.

It is recommended that the word "heritage" is replaced with the term "historic environment" in objective 2 of the Local Plan Strategic Objectives in paragraph 2.5. The term "historic environment" is a more all-encompassing term which demonstrates consideration of non-designated heritage assets and intangible cultural heritage. This applies throughout the Plan policies.

Change To Plan:

Full Reference: C - 6283 - 8441 - Placeshaping - None

6212 Comment Respondent: Sport England (. Laura Hutson) [8431]

Agent: N/A

Summary: PL1 - Design Principles for Development - Active Design

It is stated that a high standard of urban and architectural design is expected within all developments. It is also noted that there is a focus within the Local Plan on residents' health and wellbeing more generally.

Sport England welcomes this approach and believes it would be strengthened with reference to Sport England Active Design guidance, which goes far beyond sport and recreation and aims to build physical activity into everyday life.

Sport England and Public Health England have recently refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy - please see website extract and link below:

We believe that being active should be an intrinsic part of everyone's daily life - and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.

That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.

The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.

The Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.

<https://www.sportengland.org/facilities-planning/active-design/>

Or watch our short video here <https://www.youtube.com/watch?v=mDaVBh1Bs7Y>

Change To Plan:

Full Reference: C - 6212 - 8431 - PL1 Design Principles for Development - None

6225 Comment Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]

Agent: N/A

Summary: Policy PL1 Design Principles for Development: there is no mention of the provision of green infrastructure as part of new development which should be addressed, together with the aims to link in with the existing green infrastructure. Any new green infrastructure should also be accessible to all users, including equestrians.

Change To Plan:

Full Reference: C - 6225 - 7887 - PL1 Design Principles for Development - None

6275 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL1: Design Principles for Development
 We support the inclusion of an overarching design principles policy. The need for development to protect or enhance local distinctiveness and to have regard for historic significance is welcomed. It is however recommended that the part b is amended to refer simply to the "historic environment" rather than to "features of local and historic significance". The acknowledgement in the policy to locally listed or significant building is supported but this would also be captured under the wider umbrella term "historic environment".

Change To Plan:

Full Reference: C - 6275 - 8441 - PL1 Design Principles for Development - None

6346 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC recommends that flood mitigation should also be mentioned in the design principles. ECC Public Health promotes the 10 Active Design principles. These could be incorporated within this policy. The reference to a high standard of urban and architectural design could be improved by adding 'landscape' as well in the design context. The policy refers to an adopted SPD (on design). This SPD (and others) will need to be linked specifically to the new Local Plan policies and that will need to be made clear in the adopted SPD by revising it. Consideration could also be given to whether there is a need to otherwise review and update or revise the SPDs. Policy PL1 requires a high standard of urban and architectural design for all development. Consideration needs to be given to the skills infrastructure to support criterion (g) - in particular technological changes (Digital Construction / Modern Methods). Paragraph 1.2 references that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three roles:

- * An economic role by contributing to a strong, responsive and competitive economy
- * A social role by supporting strong, vibrant and healthy communities
- * An environmental role by contributing to the protection and enhancement of the environment

This indicates that support should be sought from developers in major developments to support the Skills Infrastructure required. There is also a need to support the delivery of training / education courses in urban design / regeneration / house design. There is no mention of Skills in the infrastructure section (see ECC comments on Policy PR4 and its supporting text).

Change To Plan:

Full Reference: C - 6346 - 8452 - PL1 Design Principles for Development - None

6196 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: These design principles have not been adhered to, you only have to look at the state of the Bus Stops on Parnall Road, vandalised & dirty, which are going to suggest to any homebuyer that there is crime in the neighbourhood. Also rusty railings all bent over & rotting suggest that design principles for local features are being ignored.

Change To Plan:

Full Reference: C - 6196 - 8418 - PL1 Justification - None

6201 Comment**Respondent: Mr Andrew Whybrow [8423]****Agent: N/A**

Summary: Whilst the concept of Gibberd was laudable the actual design and materials used in the Town Centre & the "original" Staple Tye have proved to be a total disaster. This comment can also be made of the experimental materials & designs of Berecroft, Bishopsfield & the now demolished Honey Hill development. Consequently any new building must not be of an experimental nature or some pet project by a trendy architect. Always ask the question what will the Building be like in 50/100 years in the future.

Change To Plan:

Full Reference: C - 6201 - 8423 - PL1 Justification - None

6348 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: It is usual for full planning applications to be accompanied by BOTH a planning statement and a Design and Access Statement. These are normally two different documents.

ECC recommends that the wording should be amended to:

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

Change To Plan:

Full Reference: C - 6348 - 8452 - PL1 Implementation - None

6347 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: More detail should be inserted into clause (f) or the supporting text should be expanded to state that a role of the policy is to ensure that new development would not compromise the current or future operation of safeguarded minerals and waste infrastructure which are either developed or allocated. This is to the benefit of both the operators of the existing or allocated mineral or waste development, and potential users of any new development.

Please also note that any site allocations made within the sand and gravel MSA should make reference to the need for a mineral resource assessment to be carried out either as part of or prior to any planning application being made. ECC can assist in screening proposed site / growth allocations for mineral and waste implications.

Change To Plan:

Full Reference: C - 6347 - 8452 - PL2 Amenity Principles for Development - None

6232 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: Persimmon Homes support sustainable development and the significant energy savings that can be made through the design and specification of the fabric of new homes.

The Government have been clear as to the extent the planning system should have in the delivery of additional technical building standards. Both the ministerial statement from July 2015 and paragraphs 56-001 to 56-023 in the PPG show that it is the Government's intention to deliver the vast majority of improvements in technical building standards through Building Regulations. As such there should be no requirement for applicants to demonstrate how they will meet Building Regulations or provide an Energy Assessment detailing the energy demands and carbon dioxide emissions as required by Part L of the Building Regulations. These regulations are legal standards to which all developers must accord and as such it is inappropriate and unnecessary to require any evidence on these matters when applying for planning permission. It is also unreasonable to expect exceedance of these standards.

Change To Plan:

Full Reference: C - 6232 - 8437 - PL3 Sustainable Design, Construction and Energy Usage - None

6276 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL3: Sustainable Design, Construction and Energy Use

We welcome the inclusion of a policy for sustainable construction, design and energy use. However, as currently drafted the policy makes no specific reference to the historic environment or to visual impact and setting. This policy is likely to refer to new build developments only, but that is not clear and could be interpreted as applying to all developments of all scales. The use of modern construction techniques on a listed building, for example, may detrimentally affect existing historic fabric elsewhere in the building therefore risking damage to the heritage asset contrary to the objective of the NPPF to conserve and enhance the historic environment. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character or appearance. Special considerations under Part L of the Building Regulations are also given to locally listed buildings, buildings of architectural or historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. It is recommended that the policy is clarified as at this stage as it's remit is unclear to prospective applicants and decision makers.

Change To Plan:

Full Reference: C - 6276 - 8441 - PL3 Sustainable Design, Construction and Energy Usage - None

6349 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC suggests that this should refer to the new EA climate change allowances - <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>
In regard to surface water drainage, when designing new development it should be demonstrated that the upper end allowance for climate change is designed for whenever possible. Should it prove impossible to accommodate these additional volumes within the formal drainage design it should be demonstrated that the additional volumes could be accommodated elsewhere on the site in the form of managed exceedance flows.

Change To Plan:

Full Reference: C - 6349 - 8452 - PL3 Sustainable Design, Construction and Energy Usage - None

CHAPTER: PLACESHAPING

PL3 Justification

6247 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: 2.17 - My concern is that for the sake of creating affordable housing and new Council development, green areas may be 'eaten away' to the detriment of currently existing Harlow residents who would have chosen their home next to green areas to enjoy the amenities. More housing development yes, but certainly not to the expenses of existing residents.

Change To Plan:

Full Reference: C - 6247 - 8436 - PL3 Justification - None

CHAPTER: PLACESHAPING

PL3 Implementation

6350 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This states that a sustainability statement may be required for new developments. It is suggested that this should be made a requirement for major developments, albeit in a proportional way.
This paragraph also states that the energy hierarchy set out in the Strategic Policies should be considered within the Sustainability Statement. However, the strategic policies have not been published and are not yet available for this purpose.

Change To Plan:

Full Reference: C - 6350 - 8452 - PL3 Implementation - None

6221 Comment

Respondent: Janet Watkins [6004]

Agent: N/A

Summary: 2.22 - ".....continue to protect green wedges and green fingers from encroachment....."

Therefore, I trust the following will be protected:

(a) land between High House Estate and Moor Hall Road (green belt, formerly a tree nursery, HDC owned), now overgrown and wildlife haven/sanctuary for deer, foxes, pheasants, squirrels and many birds etc.

(b) playing field next to Gilden Way, used by footballers, walkers and residents alike. A recreational and visual asset to the local community and town.

(c) small woodland next to Gilden Way/above playing field, which is regularly used by locals, and shelters birds and wildlife alike. Believe this is part of an ancient woodland, which should have protection.

Change To Plan:

Full Reference: C - 6221 - 6004 - PL4 Green Wedges and Green Fingers - None

Summary:

i) Policy PL4 Green Wedges and Green Fingers

3.2 In total 54% of Harlow comprises open space, being 21% Green Belt, 23% Green Wedge and 10% other open spaces (excluding residential gardens). The administrative boundary of Harlow is drawn tightly around the developed area, with there clearly being considerable pressure on land for new development to meet the objectively assessed need.

3.3 Policy PL4 considers Green Wedges and Green Fingers, stating development on such land will only be supported where it is for small-scale development (defined as householder applications, school or sports related development, recreation and community uses), essential infrastructure, replacement buildings, or it constitutes strategic infrastructure which is of benefit to the wider community.

3.4 Additionally, development must demonstrate that the roles and functions of the Green Wedges and Green Fingers are not adversely affected and it enhances the landscape, promotes biodiversity and integrates with existing green infrastructure.

3.5 The justification for Policy PL4 states that Green Wedges and Green Fingers are fundamental to the character of Harlow, with the purpose of the policy being to continue to protect these areas whilst recognising there may be opportunities for some development within them.

3.6 However, Policy PL4 is overly restrictive for the whole of the Green Wedge and does not recognise that there are some areas that do not contribute towards the roles and functions of the Green Wedge.

3.7 Given that 54% of the total Harlow area comprises open space, releasing land within the Green Wedge that does not contribute towards its roles and functions would assist HDC in meeting the housing need whilst retaining the functioning areas of open space.

3.8 HDC undertook a Green Wedge Review in 2014, which identified the predominant land uses within the Green Wedge as being park and other grassland, park and other woodland, recreation and education. A small number of other uses are found, including residential, although the proportion of these other uses is low overall.

3.9 The Green Wedge Review considered the Green Wedges and Green Fingers within Harlow, relevant national and local policy and consultation responses. This identified 7 No. key roles that the Green Wedge network in Harlow fulfils, as follows:

1. Separation between neighbourhoods;
2. Preservation of original natural, physical and landscape features;
3. Preservation and enhancement of the setting and character of historic/cultural sites and areas;
4. Bringing a sense of the countryside into urban areas;
5. Provision of informal and formal sport and recreation facilities;
6. Provision of transport and wildlife corridors which link the Green Wedges with residential areas and the surrounding countryside;
7. Protection for undeveloped corridors of open land.

3.10 The Green Wedge Review refers to the Strategic Gaps and Green Wedge Policies in Structure Plans Report produced by the Office of the Deputy Prime Minister in 2002, which identified that Green Wedges 'serve a more specific purpose than rural buffers and strategic gaps, as Green Wedges are more related to providing access to open space from urban areas' (Paragraph 4.5).

3.11 The Harlow Design Guide SPD (October 2011) defines Green Wedges as large areas of strategic open space which help define neighbourhoods from each other, bring the countryside into the urban area and are more than movement corridors for vehicles or simply landscape buffers, and are an enduring legacy of Gibberd's masterplan.

3.12 Whilst it is clear the Green Wedges perform various roles and functions, their key purpose is to provide landscape features, open spaces and recreational facilities.

3.13 The Green Wedge Review undertook the first detailed assessment of the Green Wedge network in Harlow, dividing the network into 18 wedges to assess each part independently. However, in some instances these wedges were of a substantial size, with a limited number of viewpoints chosen within these.

3.14 Some specific sites were then chosen for assessment of removal, although it is not clear how these were chosen and only a limited number were assessed.

3.15 Overall it is considered that there is a greater potential for the removal of sites within the Green Wedge than considered in the Green Wedge Review. As no policies map has been published to date it is unclear whether HDC is taking forward the removal of sites within the Green Wedge as identified within the Review or whether additional or alternative sites are proposed for removal.

3.16 In the absence of this information, these representations have been formulated on the basis that those sites identified for removal in the Green Wedge Review are the only sites that have been considered for removal in the Local Plan.

3.17 HDC has not considered the removal of all potential sites from the Green Wedge and the currently wording of Policy PL4 does not allow for any further consideration, restricting development to a very small scale and for a limited number of uses.

3.18 As detailed in Section 4 below, our Client's Site is currently located within the Green Wedge and was not specifically assessed or identified for removal within the Green Wedge Review. In the absence of any site specific assessment undertaken by HDC, these representations seek to provide such an assessment against the roles and functions of the Green Wedge, demonstrating that the Site does not contribute towards these.

3.19 The current wording of Policy PL4 is overly restrictive and does not allow for any consideration of whether a site contributes towards the roles and functions of the Green Wedge on a site-by-site basis, unduly giving a high level of protection to all land contained within the Green Wedge.

Change To Plan:

Full Reference: C - 6266 - 8399 - PL4 Green Wedges and Green Fingers - None

6309

Comment

Respondent: Miller Homes [8449]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]

Summary: Our client requests that Policy PL4 is relaxed to specifically allow the following uses, where their provision does not adversely affect the role and function of the Town's Green Wedges and Green Fingers:

- (i) social clubs;
- (ii) sports clubs;
- (iii) schools including their playing fields;
- (iv) allotments; and
- (v) public open spaces.

Change To Plan:

Full Reference: C - 6309 - 8449 - PL4 Green Wedges and Green Fingers - None

6324

Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: The Central and Eastern Stort Crossings will play an important role in facilitating Harlow's growth and it is important that the Development Management document supports their delivery.

Policy PL4 should be re-worded to recognise and support the delivery of the crossings within a specific part of the Stort Valley green wedge. This would be consistent with EHDC's draft Policy GA2 (The River Stort Crossings) which states that "The Council will work with key stakeholders including Hertfordshire County Council, Essex County Council, Harlow Council, Hertfordshire LEP, and others as appropriate, to facilitate the delivery of the following transport improvements to crossings of the River Stort...".

The policy should also recognise that the introduction of improved public transport corridors may require a balance to be drawn between the benefits of changing modes of travel and existing green spaces and landscaping.

Change To Plan:

Full Reference: C - 6324 - 7958 - PL4 Green Wedges and Green Fingers - None

713

6337 Comment**Respondent: Harlow Civic Society (Mr John Curry) [5318]****Agent: N/A**

Summary: On behalf of Harlow Civic Society:

We are generally in favour of the draft document, but would comment as follows in respect of Section PL4 - Green Wedges & Green Fingers.

Given recent developments on Green Wedges, we believe that the protection measures for these vital areas of Harlow are not strong enough, nor sufficiently specific. We think that the document should say that " development on land designated as Green Wedge or Green Finger will not be supported except in exceptional circumstances".

The conditions that we would apply would be for example: A direct replacement for an existing building, or, minor modifications and additions to existing buildings; but excluding creeping addition over long periods.

We have come to this opinion because, in recent years the Green Wedges have been built on in a way that can be considered to be cynical - involving land swap deals. We are equally concerned that authorities and organisations - other than Harlow Council - that have "ownership" or administrative rights over our priceless Green Wedges & Fingers, such as Essex County Council, The Homes & Community Agency and Harlow College, could be encouraged by the use of the positive phrase "will be supported".

We recommend a change in the wording that will imply that within the Green Wedges & Fingers is discouraged.

Change To Plan:

Full Reference: C - 6337 - 5318 - PL4 Green Wedges and Green Fingers - None

6351 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Criterion (a) refers to 'small scale development' but this is not clear as to how this will be defined.

It is noted that this policy states that

"Additionally, development must meet both the criteria below:

(e) it demonstrates that the roles and functions of the Green Wedges and Green Fingers are not adversely affected; and

(f) it enhances the landscape, it promotes biodiversity and integrates with existing Green Infrastructure."

As Green Wedges and Green Fingers should promote biodiversity, ECC points out that they should be seen as making an important contribution towards the strategic green infrastructure around Harlow to avoid recreational impacts on Harlow Woods SSSI.

Paragraph 2.22 would benefit from reference to Green Wedges and Green Fingers as contributing to strategic green infrastructure as a strategic solution to avoiding recreational impacts on Harlow Woods SSSI and improve biodiversity of this designated site.

Whilst it is recognised that there may be potential for development with some of the green wedges, fingers and other open spaces it is also suggested that the two policies need to read more strongly in favour of protecting the spaces unless it can be seen that the development provides much needed community facilities or enhances the use and appearance of the space. ECC welcomes the wording in the text that appears to set that out e.g. paragraph 2.21 and 2.22. Any possible conflict with policy PL7, stating that green infrastructure and landscaping must be protected needs to be avoided.

ECC is unclear as to paragraph 2.24 where reference to householder applications is set out; this implies that residents are able to purchase/use land for their own benefit and could lead to piecemeal extension of buildings and garden curtilage into the green space/s.

The text in paragraphs 2.26 - 2.28 is good but the wording of the two policies is less positive in terms of the objective of protecting the spaces which make a positive contribution. The open spaces are not mapped but green wedges and fingers are. Noted the text in paragraph 2.29 the woodland and landscape belts should perhaps be classified as green fingers.

Small scale development should be strictly defined.

ECC advises that both policies PL4 and PL5 are strengthened so that protection is the stronger objective. For example the wording could read along the following lines; 'Development on land designated as green wedges/finger or other open space will be refused/resisted unless it can be shown that': then the criteria are listed out.

Policy PL4 green fingers and green wedges; reads as below, we suggest adding in some extra wording (red and underline):

Policy PL4 Green Wedges and Green Fingers

Development on land designated as Green Wedge or Green Finger will be supported where it meets one or more of the criteria below:

(a) it is for small-scale development;

(b) it is for essential infrastructure and local transport infrastructure which must demonstrate a requirement for a Green Wedge or Green Finger location;

(c) it is for the replacement of buildings, provided that the new building/buildings are in the same use and not more harmful than the one it replaces;

(d) it constitutes strategic infrastructure development which can demonstrate that it is of benefit to the wider community.

Additionally, development must meet both the criteria below:

(e) it demonstrates that the roles and functions of the Green Wedges and Green Fingers are enhanced and not adversely affected; and

(f) it demonstrates that the wider landscape and setting is enhanced, it promotes biodiversity and integrates with existing Green Infrastructure.

Change To Plan:

Full Reference: C - 6351 - 8452 - PL4 Green Wedges and Green Fingers - None

6385 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: Note: The following also applies to policies PL5 - PL7.

The retention of hedgerows and trees should be a priority to maintain the town's 'green' credentials and new developments should provide green wedges and amenity space - these should not be allowed to be developed at a later date as they also provide wildlife habitats.

Change To Plan:

Full Reference: C - 6385 - 5434 - PL4 Green Wedges and Green Fingers - None

6202 Comment Respondent: Mr Andrew Whybrow [8423]

Agent: N/A

Summary: There must be no development of these Green Wedges they are fundamental in ability of Wildlife to survive in all ready over developed area.

Change To Plan:

Full Reference: C - 6202 - 8423 - PL4 Justification - None

6293 Comment Respondent: Dr Roger Bamford [8442]

Agent: N/A

Summary: It is good to see continued protection of the Green Wedges and the introduction of Green Fingers. In many ways these open spaces are more important than the Green Belt in Harlow.

The Green Wedge Review provides clear evidence for the continued protection of the Green Wedge and the release of areas not functioning as such.

Change To Plan:

Full Reference: C - 6293 - 8442 - PL4 Justification - None

6277 Comment Respondent: Historic England (Ms Katie Parsons) [8441]

Agent: N/A

Summary: Policy PL5: Other Open Spaces
We welcome the reference to the urban design principles of the town.

Change To Plan:

Full Reference: C - 6277 - 8441 - PL5 Other Open Spaces - None

6352 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC would advise that both policies PL4 and PL5 are strengthened so that protection is the stronger objective.

PL5 other open spaces; reads as below. ECC is unclear as to the intent of the policy. Surely development on open spaces would only be supported where strict criteria are met? Is it meant to read that development will be supported only where certain criteria are met, as in the case of the PL4? The a), b), c) text below in the policy are not criteria. They are aspects which would create unacceptable impacts and should therefore not be supported?

PL5 Other Open Spaces Development on Other Open Spaces will be supported unless one or more of the following criteria are met:

- (a) the development would compromise the landscape character, openness, biodiversity or urban design principles of the town and/or the surrounding area;
- (b) the development would 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 prejudice the potential for comprehensive development of adjacent land.

The policy wording could read more strongly if it said: Development on other open spaces will only be supported in exceptional circumstances (set these out). Where the following impacts will result then development will normally be refused: a) b) and c) could then be added.

Also, refer to ECC comments above (on Policy PL4) regarding recreational impacts on designated sites for biodiversity - Other Open Spaces are valuable for providing local opportunities for recreation as part of a strategic solution to avoid impacts on Harlow Woods SSSI, so the above paragraphs would benefit from amendment.

Change To Plan:

Full Reference: C - 6352 - 8452 - PL5 Other Open Spaces - None

6248 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: I refer to my comments on PL3 2.17. How is the Council planning to monitor and ensure Sir Gibberd's plans to create a green amenities rich town will be maintained, when every green area seems to be put at risk of housing development? It shows no respect for the original New Town and no consideration for Harlow existing residents who enjoy such green amenities.

Change To Plan:

Full Reference: C - 6248 - 8436 - PL5 Justification - None

6353 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC supports the main intentions of this policy and supporting text relating to trees and hedgerows. The reference to veteran and ancient trees in paragraph 2.33 is welcomed although the text in paragraph 2.34 would be more robust in defending hedgerows from inappropriate development if this was amended to also refer to assessment for biodiversity, eg bat foraging or commuting habitat, not just Arboricultural Impact Assessments. Hedgerows are listed as Priority s41 Habitats so this should be added to the justification in paragraph 2.33.

Change To Plan:

Full Reference: C - 6353 - 8452 - PL6 Trees and Hedgerows - None

71

6354 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This should read with red text below added:

Existing specific protections that trees and/or hedges may have include Tree Preservation Orders and other protections offered by Conservation Areas and the 1997 Hedgerows Regulations.

Change To Plan:

Full Reference: C - 6354 - 8452 - PL6 Implementation - None

6203 Comment **Respondent: Mr Andrew Whybrow [8423]** **Agent: N/A**

Summary: The Council should work in conjunction with outside Agencies such as Essex Wildlife Trust to ensure that any development has a minimal effect of the Natural Environment. Any tree/hedgerow removed should be replaced on a 3 to 1 basis to ensure future sustainability.

Change To Plan:

Full Reference: C - 6203 - 8423 - PL7 Green Infrastructure and Landscaping - None

6226 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: Policy PL7 Green Infrastructure and Landscaping: this Policy should aim to ensure that any green infrastructure is accessible to all users, including equestrians.

Change To Plan:

Full Reference: C - 6226 - 7887 - PL7 Green Infrastructure and Landscaping - None

6278 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

Summary: Policy PL7: Green Infrastructure and Landscaping
We would recommend that the policy is amended to refer to the function that Green Infrastructure can have in enhancing and conserving the historic environment. The policy in its current draft only refers to the enhancement of landscape character, it is suggested that the historic environment is also considered here. Green Infrastructure can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and tangible link with history.

Change To Plan:

Full Reference: C - 6278 - 8441 - PL7 Green Infrastructure and Landscaping - None

6355 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC welcomes and supports this policy relating to green infrastructure and landscape. That said, there is an identified wording improvement as an addition to suggest.

Current text reads: "(a) new Green Infrastructure and landscaping are well planned, taking into consideration the practicalities and requirements of future management and maintenance;"

Suggested wording: new Green Infrastructure and landscaping are well planned and integrated as part of the development layout, taking into consideration the practicalities and requirements of future management and maintenance;

Paragraphs 2.42 and 2.43: Green infrastructure should be viewed as flood risk reduction and mitigation infrastructure. This is in line with the NPPF, which clearly promotes the use of mixed developments to encourage multiple benefits from the use of urban and rural land. Some open land can perform many functions such as for wildlife habitats, recreation, flood risk mitigation, carbon storage, or food production.

Also on paragraphs 2.42 and 2.43, see ECC comments above regarding a suggested strategic solution with green infrastructure playing an important role in avoiding recreational impacts on designated sites such as Harlow Woods SSSI and it is recommended that this should be added to the justification in paragraph 2.40. Creating functional greenspace within new developments is important to provide a daily walking route of 2.6km for new residents and ECC suggests that paragraph 2.42 refers to this benefit to improving the natural environment within the Impact Risk Zone of designated sites.

Change To Plan:

Full Reference: C - 6355 - 8452 - PL7 Green Infrastructure and Landscaping - None

6264 Comment**Respondent: Natural England (Mr Jamie Melvin) [8440]****Agent: N/A**

Summary: Natural England notes that paragraph 2.48 recognises the hierarchy of sites. This however needs to be incorporated into the policy itself to satisfy paragraph 113 of the National Planning Policy Framework. Note that 113 further requires that criteria based policies are set and that distinctions should be drawn between international, national and locally designated sites. Whilst the document correctly recognises that Sites of Special Scientific Interest are the highest order of site within Harlow your authority should afford sites outside of the authority boundary the same level of protection.

Change To Plan:

Full Reference: C - 6264 - 8440 - PL8 Biodiversity and Geodiversity Assets - None

6298 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: Policy PL8 Biodiversity and Geodiversity Assets

We support the inclusion of this policy. However, it should also make reference to invasive non-native species and their management, including biosecurity measures. Invasive species are a growing issue and must be addressed to stop the spread, particularly Japanese Knotweed. Development sites should be checked for invasive species and measures should be put in place to follow biosecurity and eradicate the invasive species on site.

Change To Plan:

Full Reference: C - 6298 - 8443 - PL8 Biodiversity and Geodiversity Assets - None

6356 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Policy PL8 would benefit from re-structure to follow the mitigation hierarchy and Government's Natural Environment White Paper. Therefore ECC recommends the following order of requirements:

- a) Conserve/protect biodiversity and geodiversity assets
- b) Where this is not possible, mitigation measures will be required
- c) Where there is a residual impact, compensatory measures will need to be secured offsite.
- d) Reasonable enhancement of existing assets and creation of new biodiversity to improve connectivity and contribute towards improving ecological networks, particularly in the Living Landscape areas and Greater Thames Marshes NIA to deliver net gain for biodiversity.

Paragraph 2.47 refers to no net loss of biodiversity but Policy PL8 does not contain any reference to compensatory measures. In addition, this policy has the opportunity to ensure development delivers a net gain for biodiversity - see d) above.

Paragraph 2.49 would benefit from adding a references to:

- a) Non-statutory Local Sites (for both biodiversity and geodiversity) which are part of the evidence base for the Local Plan, as referenced in the NPPF
- b) Reporting of condition monitoring for Local Sites (for both biodiversity and geodiversity) to Government (Single Data List 160-00 re Positive Conservation Management) and
- c) A commitment to declaration of Local Nature Reserves to provide opportunities for people to enjoy nature

Best practice for implementation of Policy PL8 includes a validation checklist for developments likely to affect biodiversity and geodiversity. Reference to the Essex Biodiversity Validation Checklist in paragraph 2.50 would enable biodiversity to be considered at the earliest stage in planning a development which de-risks it and avoids delays. Paragraph 2.51 would benefit from re-wording to follow the mitigation hierarchy too (ie protect, mitigate, compensate, enhance) and list planning conditions first, then obligations and finally management agreements.

Change To Plan:

Full Reference: C - 6356 - 8452 - PL8 Biodiversity and Geodiversity Assets - None

6249 Comment Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: Regarding noise pollution, Harlow has become regular target by airplanes which fly from and to Stansted airport at lower levels. The low height from ground means that Harlow residents are currently affected by noisy airplanes flying over our heads at a frequency of only every 5 minutes from one another, and on a 24 hour cycle. How is Harlow Council planning to resolve this?

Change To Plan:

Full Reference: C - 6249 - 8436 - PL9 Pollution and Contamination - None

6299 Comment Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: Policy PL9 Pollution and Contamination

We strongly support the inclusion of this policy within the plan. A robust policy must be in place to ensure that risks to groundwater are minimised as much as possible. The policy must ensure that no development will negatively impact upon water quality or waterbodies, whilst specifically focusing upon the prevention and remediation of land contamination within the borough. Contaminated sites have the potential to mobilise contaminants and consequently cause pollution.

The policy should help to ensure that developing land affected by contamination won't create unacceptable risks, or allow existing ones to continue. It should require developers to ensure sites are suitable or made suitable for the intended use, whilst ensuring that future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.

The policy should state that all land which is considered to be contaminated will require a Preliminary Risk Assessment (PRA) to be submitted as part of the planning application, and that where necessary further site investigations, detailed risk assessments, remediation strategies, long term maintenance regimes, and validation reports may be required if contamination is found. It should be explicit that planning permission will not be granted for development that poses a threat to the quality of surface and/or groundwater, and should specifically reference the importance for all development to not detrimentally impact upon Source Protection Zones (SPZ) in particular, which are areas designated for the abstraction of clean drinking water.

The policy should be explicit in avoiding high risk development proposals within vulnerable groundwater areas, specifically petrol stations and cemeteries.

Change To Plan:

Full Reference: C - 6299 - 8443 - PL9 Pollution and Contamination - None

6357 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC suggests that this should mention that the Essex SuDS Design Guide provides guidance on how to mitigate against surface water pollution. See: <http://flood.essex.gov.uk/new-development-advice/how-to-design-suds-in-essex>

Change To Plan:

Full Reference: C - 6357 - 8452 - PL9 Pollution and Contamination - None

6251 Comment Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: Re 2.54, my concern is that again, for the sake of bringing in more employment and industries to Harlow, Harlow Council does not respect existing green fields next to existing residential estates, which contribute to retain the amenity character of this town.

Change To Plan:

Full Reference: C - 6251 - 8436 - PL9 Justification - None

Summary: Policy Comments

Thames Water support the proposed policy on SuDS under Policy PL10. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground or watercourse. It is only when all options have been exhausted and there is not practical reason for using sustainable drainage, that developers should seek connection to the public network. It is important to minimise the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage conveyance and to reduce the risk of sewer flooding.

Need for a policy on wastewater infrastructure

With regard to the proposed Development Management Policies consultation it will be important to ensure that any development proposals coming forward are aligned with any necessary upgrades to the sewerage network. Developers should be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users in the form of internal and external sewer flooding, or pollution of land and water courses.

In order to address this issue Thames Water request that the following policy and supporting text is included in the Local Plan. Alternatively similar wording could be incorporated into the proposed policies such as Policy PL10, which should address all forms of flood risk including sewer flooding.

Proposed Policy:

Planning permission will only be granted for developments which increase the demand for off-site wastewater infrastructure where:*

- 1) Sufficient capacity already exists; or
- 2) Extra capacity can be provided in time to serve the development that will ensure that the environment and the amenities of other users are not adversely affected.

In accordance with the Planning Policy Guidance, 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 will be completed prior to occupation of the development.

Proposed Supporting Text:

The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users in the form of internal and external sewer flooding, pollution of land and water courses.

In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered.

Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to 10 years.

Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. Thames Water relies heavily on the planning system to ensure infrastructure upgrades are provided ahead of development either through Local Plan Policies or the use of appropriately worded 'Grampian style' planning conditions.

In order to ensure that the water supply and drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames

Water Developer Services in advance of the submission of planning applications.

Thames Water recommend that developers engage with them at the earliest opportunity to establish the following:

- * The developments demand for wastewater infrastructure both on and off site and can it be met; and
- * The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Information for Developers on water/wastewater infrastructure can be found on Thames Water's website at: <http://www.thameswater.co.uk/developers/1319.htm>

Change To Plan:

6233 Comment Full Reference: C - 6220 - 8433 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None
Respondent: Persimmon Homes (Mr David Moseley) [8437] **Agent: N/A**

Summary: Policy PL10 requires all new residential development to achieve a water efficiency target of 110 litres per person per day and development should also make adequate and appropriate provision for water recycling.
Changes to Building Regulations in 2010 require that the potential consumption of someone occupying a new home must not exceed 125 l/p/d and it is through the building regulations rather than planning, that this consumption should be addressed.
Any additional requirements need to be fully evidenced and the Local Planning Authority should consider the impact of using these standards as part of their Local Plan viability assessment.

Change To Plan:

6252 Comment Full Reference: C - 6233 - 8437 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None
Respondent: Mrs Giulia Festa-Burton [8436] **Agent: N/A**

Summary: You refer to European directives regarding 3. Flooding. How is Brexit going to affect new policies regarding prevention and solution to floods in Harlow?

Change To Plan:

Full Reference: C - 6252 - 8436 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6300 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: Policy PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems

1. Water Quality

We are pleased to see that the deculverting of watercourses will be required where appropriate. All relevant proposals should investigate and secure the implementation for restoring culverted sections of watercourses to a naturalised state. This is in line with the requirements of the Water Framework Directive (WFD) and the Thames River Basin Management Plan (TRBMP). We would object to any planning application that we are consulted upon which does not do so. The policy should also specifically state that where deculverting or other river enhancements are shown to be unfeasible, the council will seek a financial contribution to restore another section of the same watercourse.

In addition to deculverting, you should also include the requirement for all new development adjacent to designated main rivers to provide and maintain a minimum undeveloped 8 metre buffer zone to the watercourse. This is to enhance and protect local biodiversity and wildlife corridors, provide space for flood waters, and provide access for maintenance works. This distance is in line with our Flood Risk Activity Permit, which is legally required for certain works within 8 metres of a main river. The buffer zone will provide a naturalised buffer free of built development, be designed for the benefit of biodiversity (including the planting of locally appropriate, UK native species) and be 'undisturbed' by development (i.e. no fencing, footpaths, lighting or other development). Such proposals must also include a long term scheme put in place to protect and enhance the conservation value of the watercourse, in line with the requirements of the WFD and the TRBMP.

Under the WFD, waterbodies must be at 'good' ecological status/potential (i.e. clean and healthy) by 2027. The UK has a legal obligation to meet this target and you as a local authority have a duty to work to achieve this, including through your Local Plan policies. None of your watercourses are currently achieving 'good' ecological status/potential, and therefore it is essential that you should be seeking to improve the quality of your watercourses to comply with your requirements under the TRBMP.

2. Water Management

We are pleased to see that water efficiency has been considered within this policy, with a commitment that all new dwellings should achieve water efficiency standards of no more than 110 litres per day. However, you should also set a target for commercial properties. This is necessary to ensure new development appropriately considers water consumption, in this area of the country which is under extreme water stress.

3. Flooding

We are pleased to see that flood risk has been considered within this policy, as Harlow contains areas of Flood Zone 2, 3a and 3b. It is therefore essential that you consider the risks associated with flooding in order to protect new developments against flood risk. However, there are a few aspects of the policy which should be amended in order to strengthen the policy.

In particular, specific reference within the policy should be made to the fact that a Flood Risk Assessment (FRA) must be submitted for all proposed developments within areas at risk of flooding. Planning applications within Flood Zones 2 and 3 that are without an FRA should be refused.

The policy must also state that no inappropriate development will be permitted within Flood Zone 3b, defined by your own Strategic Flood Risk Assessment (SFRA) as the functional floodplain where flood water is to be stored in times of flooding. The only development types that are considered compatible with Flood Zone 3b are 'water compatible' and 'essential' development, as defined within Tables 2 and 3 of the Planning Practice Guidance Flood Risk and Coastal Change section. The policy should also state that the functional floodplain should be restored wherever possible through a reduction of footprint within Flood Zone 3b as a result of development proposals. Additionally, whilst it is good that the policy ensures that 'there should be no net loss in flood storage on site', it should also encourage an increase in flood storage wherever possible.

It would also be good for the policy to have more emphasis on the climate change allowances which all development proposals within flood risk areas must consider. The climate change allowances must be used to determine the existing flood risk on the site, and the proposed mitigation measures such as finished floor levels, floodplain compensation, and routes of safe access and egress.

Finally, the beginning of point 'C' should read 'floor levels', not 'flood levels'.

Change To Plan:

Full Reference: C - 6300 - 8443 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6310 Comment**Respondent: Miller Homes [8449]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: Policy PL10 currently directs that all dwellings should achieve the Optional Technical Housing Standard for water efficiency of no more than 110 litres per day. The actual standard is no more than 110 litres per day &quot;per person&quot;, not per dwelling as the policy currently implies.

Policy PL10 should be amended accordingly to avoid any ambiguity.

Change To Plan:

Full Reference: C - 6310 - 8449 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6325 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: Places for People would like to work closely with Harlow Council on the final content of this policy to ensure its criteria do not inadvertently prejudice the delivery of the two proposed crossings across the Stort Valley.

Change To Plan:

Full Reference: C - 6325 - 7958 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6358 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: SuDS can be designed and incorporated to the development layout to contribute towards Green Infrastructure and Landscaping policy (PL7) and Biodiversity (PL8).

Policy text says "4. Sustainable Drainage Systems. Where a sustainable drainage system (SuDS) is required,..." ECC as Lead Local Flood Authority recommends SuDS to be an integral part of any and all developments.

Developments located in Critical Drainage Areas, as outlined in the Harlow Surface Water Management Plan, must take the evidence of surface water flood risk into consideration in the process of preparing site flood risk assessments.

1. Water quality - Comment: The Essex SuDS Design Guide provide guidance on how to mitigate against surface water pollution

3. Flooding

All development proposals will be considered against the NPPF (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 areas at low risk of flooding from all forms of flood risk. If this cannot be achieved, the exception test must be applied and the appropriate mitigation measures must be undertaken.

Development must meet all the following criteria:

(a) it must not increase the risk of flooding elsewhere. Comment: On brownfield sites, run-off rates should be restricted back to the 1 in1 greenfield rate and if this is demonstrated not be achievable, a minimum of 50% betterment on existing run-off rates should be sought - this is in line with the Essex SuDS Design Guide.

(b) within sites at risk of flooding, the most vulnerable parts of the proposed development must be located in areas at lowest risk of flooding from all forms of flood risk.

(c) flood 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 watertight depth of 300mm above the normal water level; comment: development should also be situated above any 1 in 100 plus climate change maximum surface water flood levels .

(d) 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;

(e) any necessary flood protection or mitigation measures should not have an undue impact on nature conservation, landscape character, recreation or other important matters; - remove point. This suggests that flood protection is a lower priority when it should have equal weighting to other considerations when designing a site.

(f) there should be no net loss in flood storage on site;

(g) flood flow routes should be preserved; and

(h) where necessary (add) through the use of CILs and s106 Agreements, planning permission will be conditional upon flood protection and/or runoff control measures, (add) provided by the appropriate Risk Management Authorities, being operative before other site works.

4. Sustainable Drainage Systems

A surface water drainage scheme must meet all 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 the greenfield runoff rate. Where greenfield run-off rate is demonstrated not to be viable on brownfield sites, a minimum of 50% betterment on run off rates should be demonstrated;

(d) provide appropriate attenuation taking into account climate change;

(e) provide arrangements for future maintenance and management; and

(f) major proposals should also comply with the principles and standards set out by the Lead Local Flood Authority for SuDS.

Other comments

It should be made clear that in line with Paragraph 103 of the NPPF priority should be given to SuDS.

Reference should be made to the Harlow Surface Water Management Plan and the Essex SuDS Design Guide. The Essex SuDS Design Guide provide guidance on local standards for water quality and water quantity from developments and guidance on SuDS design.

Change To Plan:

Full Reference: C - 6358 - 8452 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6204 Comment

Respondent: Mr Andrew Whybrow [8423]

Agent: N/A

Summary: You state that Harlow is in an area where the Water availability is under stress. However the increased development will only increase that further, consequently any excessive development is totally unjustified.

Change To Plan:

Full Reference: C - 6204 - 8423 - PL10 Justification - None

6359 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC suggests adding the following wording to the end of paragraph 2.65:

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. The sequential test and exception test should be applied to all forms of flood risk.

This is line with national guidance which states:

In plan-making, local planning authorities apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk. (<https://www.gov.uk/guidance/flood-risk-and-coastal-change>)

ECC suggests adding the following advice and requirements to paragraph 2.66:

Any major development should include a drainage strategy which should be submitted for the Lead Local Flood Authority (LLFA) to review, a stipulation which is in line with their requirements as outlined in 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. This could be referenced in paragraph 2.69

ECC suggests adding the following advice and requirements to paragraph

The risk of flooding can be avoided and reduced by:

- * locating new development within areas of lower flood risk through the application of the sequential test for Flood Risk and then applying an exception test in accordance with the NPPF;
- * ensuring that development proposals in flood risk areas actively manage and reduce flood risk from all sources by applying the sequential approach at site level;
- * where possible, the footprint of existing buildings should be reduced. On Brownfield sites, run-off should be restricted back to greenfield. Where this is demonstrated not to be viable, a minimum of 50% betterment on existing run off rates should be demonstrated;
- * Flood storage should be maximised through the use of Green Infrastructure unless it is clearly demonstrated, with the support of calculations, that above ground green infrastructure is not viable economically. Where the use of green infrastructure is not viable, alternative principles which meet national and local standards on water quantity and water quality should be used.

This states:

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 a sustainable drainage system, 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.

Comment:

Reference in the above should also be made to the Essex SuDS Design Guide.

It should be made clear that, in line with paragraph 103 of the NPPF, priority should be given to the use of Sustainable Drainage Systems.

Change To Plan:

Full Reference: C - 6359 - 8452 - PL10 Implementation - None

6279 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL11: Heritage Assets and their Settings

Reference to the setting of heritage assets within the headline of the policy and within the body of the policy itself is welcomed. Reference to the irreplaceable nature of heritage assets in the supporting text is also welcomed. The policy however, provides no recognition of the potential for development to enhance or better reveal the significance of heritage assets.

The supporting text in paragraph 2.83 should be expanded upon to refer to the need to consult Historic England on proposals which affect grade II* or grade I listed buildings or their setting, as well as other developments outlined within tables 1 and 2 (requirement to notify or consult with Historic England) within paragraphs 57 and 58 of the National Planning Policy Guidance (NPPG).

There is concern regarding the supporting text in paragraph 2.74 which states that, "The purpose of this policy is to protect the features and characteristics for which designated and non-designated heritage assets were selected". It would be more appropriate to state that, "The purpose of this policy is to protect the significance of heritage assets". The wording in its current form could be misleading and imply that only aspects of the heritage assets noted in list descriptions are worthy of conservation. The list descriptions are for identification purposes only and the designation generally covers all aspects of the heritage asset and whilst the reasons why a heritage asset was designated can be a useful starting point for defining significance it is not all that is considered. For the purposes of decision making, paragraph 128 of the NPPF states that local authorities should require applicant to provide a statement of significance. Paragraph 129 states that local authorities should then identify and assess the particular significance of any heritage asset that may be affected by a particular proposal. The assessment of significance happened during the assessment of a site specific application.

Paragraph 2.83 of the supporting text states that a heritage statement should be submitted where planning permission is required for alterations or additions to listed and locally listed buildings. It should be noted that a heritage statement should be provided stand-alone listed building consent application as well. The need for a heritage statement should be mentioned as a criterion in the policy itself and not only in the supporting text.

Paragraph 2.88 relates to archaeology and outlines the need for a desk based assessment or field evaluation to be submitted where proposals affect sites or are adjacent to sites of known archaeological interest or sites where there is reason to suggest there is archaeological interest. This is welcomed but is not included in the policy itself. It recommended that the policy is amended to secure this requirement.

Change To Plan:

Full Reference: C - 6279 - 8441 - PL11 Heritage Assets and their Settings - None

6316 Comment

Respondent: Anglican Deanery of Harlow (Revd Martin Harris) [8345]

Agent: N/A

Summary: I would like to suggest a further item to this effect here or elsewhere:

"In assessing the desirability of conservation, account will be taken of the need to encourage ongoing use of the building so that it continues to make a positive contribution to the community (not only as a physical asset but) through its use for and by the community".

I would propose a positive statements to the effect:

"In assessing planning applications, the provision or local availability of good and accessible (where possible shared) community facilities, including places of worship, will be a requirement"; and

"The provision of good infrastructure including schooling and adequate parking for local facilities will be a requirement in all housing developments"

Change To Plan:

Full Reference: C - 6316 - 8345 - PL11 Heritage Assets and their Settings - None

6360 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Policy P11 should be rephrased to ensure that it encompasses all of the heritage assets both above and below ground.

Under paragraph 2.76 there should be reference to the Essex Historic Environment Record containing all data on designated and non-designated heritage assets.

Archaeology is identified under paragraphs 2.88 and 2.89, however, there is no mention of enhancement of the heritage assets within development proposals which should be the starting position. This should also be reflected within the policy which at present seems targeted at the built heritage. It is recommended that the policy is reworded to encompass the whole of the historic environment.

Under paragraph 2.89 it is recommended that in the second line the word 'may' should be changed to 'will' to ensure compliance with the NPPF.

In addition:

* The majority of LPAs have sought to phrase new policies in a positive manner in accordance with the presumption in favour of sustainable development. Usually policies are now phrased "Harlow Council will support development which...." Rather than "Development that affects a heritage asset or its setting will be assessed based on the harm caused by the development..." which infers that all development will cause harm to a degree.

* PL11(a) - missed off 'and' at the end, leading onto (b)

* PL11(a) - missed off 'the' - 'of the significance'

* PL11(b) - 'harmonising' is perhaps not quite the right word as it could be construed as being conservative in your approach.

Justification

* 2.74 - 'special interest' rather than features and characteristics as some are less tangible than these.

Implementation

* 2.78 - This statement should be reworded. What it is trying to convey is to list the types of assets the policy relates to, and this should be the emphasis.

* 2.80 - In Para.2.83 it states "For proposals which affect a Grade I or II* listed building or structure, the council will also seek advice from Historic England" which is a repetition of 2.8. In addition, if providing this detail Harlow must also state all circumstances which amenity societies are notified and other types of application such as Grade I and II* Registered Parks and Gardens.

* 2.81 - This section is needs clarity with regards to Locally Listed Buildings and Non-Designated Heritage Assets. A separate section entitled Non-Designated Heritage Assets (of which Local Heritage Assets form a sub-section) would be beneficial. At present Non-Designated Heritage Assets are barely covered in comparison with the Local List which currently only has 21 entries and so are a minority of NDHAs.

* 2.82 - Harlow could be making work for itself and making itself liable in the case of discrepancies and errors. This would be solved by referencing the National List for England maintained by Historic England which is available online and also more easily accessed by the public.

* 2.83 - Need to provide clarity as there are no specific permissions required to alter or extend Locally Listed Buildings compared to Listed Buildings. Also, see above reference discussing overlap of this paragraph with 2.80.

* 2.83 - Sentence should be reworded "...how the proposal compliments or mitigates any harm towards a building's historic...."

* 2.85 - Assessing cumulative change and economic viability are overlapping but separate consideration. This paragraph merges the two concepts together uncomfortably. Suggest review.

* 2.86 - Whilst CA's were traditionally designated because of their special architectural or historic interest modern good practice takes into account other qualities (even though this is not reflected in the 1990 Act). Leave out Architectural and Historic.

* 2.87 - Suggest no need to name the Article 4 Direction Areas as Harlow may add others in time.

* 2.88/89 - There is no mention of development responding to archaeology of the site which implies two options - archaeology halts development or archaeology is lost.

Change To Plan:

Full Reference: C - 6360 - 8452 - PL11 Heritage Assets and their Settings - None

6383 Comment **Respondent: Lichfields (Mr Harry Bennett) [8454]** **Agent: N/A**

Summary: Our Heritage Team has identified a number of concerns with this policy as currently drafted as follows:
1 There is nothing in the policy text regarding weighing any harm against the public benefits. This makes it inconsistent with the NPPF (paras 133 to 134). Additional text should be accordingly added;
2 Paragraph. 2.74- This second sentence as drafted is too expansive and vague. This policy is intended to also protect a building/structure within the wider setting of a heritage asset that contributes towards its significance. However, this could encompass a significant number of buildings where only designated and non-designated heritage assets are relevant. The paragraph should be amended to clarify this;
3 Paragraph. 2.78- Designated heritage assets do not always include their curtilage; for Listed Buildings only curtilage structures if pre-1948 and potentially if building was listed after 1969. Also, settings aren't designated. Again we would suggest that this paragraph is amended to make this clear.

Change To Plan:

Full Reference: C - 6383 - 8454 - PL11 Heritage Assets and their Settings - None

6386 Comment **Respondent: Roydon Parish Council (Janet Ballard) [5434]** **Agent: N/A**

Summary: Note: The following also applies to policy PL12.

As a relatively new town, heritage assets should be protected from development in order to preserve the town's character.

Change To Plan:

Full Reference: C - 6386 - 5434 - PL11 Heritage Assets and their Settings - None

CHAPTER: PLACESHAPING PL11 Justification

6361 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: ECC advises an addition and clarification, so that this should read as follows (or similarly) to avoid any confusion with other older gardens and parks which exist and which also will be important in their own right:

2.77 Harlow contains one Historic Park and Garden recorded on the Historic England register of Historic parks and gardens. This is 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 the town.

Change To Plan:

Full Reference: C - 6361 - 8452 - PL11 Justification - None

733

6280 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

Summary: Policy PL12: Enabling development of Heritage Assets and their Settings
 A policy which seeks to address heritage at risk is welcomed, however this policy on enabling development is not the best way to achieve this. The policy reflects paragraph 140 of the NPPF but is written to apply to only heritage at risk which is more restrictive than the NPPF. By definition in the NPPF, enabling development is development that is not otherwise in accordance with adopted policy and is therefore not a necessary component of a local plan document. A stand-alone policy on enabling development is not necessary as it covered entirely by the NPPF and should be applied on a case by case basis depending on the merits of a particular proposal rather than as part of the Plan. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. It is advised that a policy on heritage at risk rather than enabling development would better achieve the desired outcome.

Change To Plan:

Full Reference: C - 6280 - 8441 - PL12 Enabling Development of Heritage Assets and their Settings - None

6362 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: ECC advises that Historic England is publishing new guidance imminently on Enabling Development (ED) which is likely to raise the required evidence base to justify ED. Accordingly when this is published this needs to be accommodated and reflected in Policy PL12, to ensure the Policy is in line with the most up to date good practice.

Change To Plan:

Full Reference: C - 6362 - 8452 - PL12 Enabling Development of Heritage Assets and their Settings - None

734

6281 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

Summary: PL13: Advertisements
 It is recommended that the "historic environment" is used rather than "heritage assets" in part (a) of the policy. It is recommended that part (d) is expanded upon to include reference to lighting and the effect that illuminated advertisements can have on the character of the surrounding area. It would also be useful if the policy included a provision which addressed the removal of redundant advertisements in order to reduce visual clutter and improve the quality of the surrounding visual environment. The draft Plan does not contain a policy which relates to shopfronts. The retention of significant shopfront elements is often integral to the character of retail frontages and that of the wider street scene, especially where they are characteristic of Harlow's particular architectural style. It is noted that the Harlow Design Guide SPD (Oct 2011) contains design principles regarding shopfronts but the SPD's objectives would be strengthened if there was a Local Plan policy in place in order to manage their change successfully.

Change To Plan:

Full Reference: C - 6281 - 8441 - PL13 Advertisements - None

6253 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: My concern is that Harlow Council again may show leniency in apply tighter policies when it comes to allowing A boards in areas of high amenity and character, such as Old Harlow High Street or even Broad Walk in Town Centre.

Change To Plan:

Full Reference: C - 6253 - 8436 - PL13 Justification - None

6209 Comment**Respondent:** . Pauline Black [8430]**Agent:** N/A

Summary:

Hi
Please can the Harlow Council planning consultation take in to account we need at least 4000 life time tenancies council homes built for the future of Harlows next generations.
Regards
Pauline Black

Change To Plan:

Full Reference: C - 6209 - 8430 - Housing - None

6215 Comment**Respondent:** The Roydon Society (Miss Nicola Wilkinson) [27]**Agent:** N/A

Summary: Taking into account the problems have had in the past with travelers - restrictions on their locality must be observed and adhered to .

Change To Plan:

Full Reference: C - 6215 - 27 - Housing - None

6222 Comment**Respondent:** Janet Watkins [6004]**Agent:** N/A

Summary: Objective 5 - "Provide a range of suitable housing for the community....."

There is no mention of building bungalow for the numerous single elderly people in 3/4 bedroom houses in the town. Many of these people would gladly downsize (myself included) if some affordable bungalows were available in the town. This would free up properties for families and allow the elderly to buy/move to a more suitable property.

Change To Plan:

Full Reference: C - 6222 - 6004 - Housing - None

6282 Comment**Respondent:** Historic England (Ms Katie Parsons) [8441]**Agent:** N/A

Summary: The capacity for the area to accommodate new housing development whilst maintaining its historic environment should be a key consideration, so that the quality and character of neighbourhoods, towns and villages is conserved. Integrating consideration of the historic environment into plan making alongside other considerations is a key principle of sustainable development. Where less successful neighbourhoods are proposed for redevelopment opportunities for enhancement should be a priority.

Change To Plan:

Full Reference: C - 6282 - 8441 - Housing - None

6318 Comment**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: Thank you for consulting the Home Builders Federation (HBF) on these development management policies. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. We have commented in the past on the more strategic elements of the Harlow Local Plan and we hope to see these progressed as soon as possible. It is important that the Council moves forward with its Local Plan to ensure sufficient sites are allocated to meet Harlow's housing needs. The Council has consistently under delivered against its planned targets and having an adopted plan will secure the necessary allocations to meet its housing needs. However, as this consultation is purely on proposed development management policies we will not comment further on the strategic concerns relating to housing needs and supply.

Change To Plan:

Full Reference: C - 6318 - 8450 - Housing - None

6319 Comment**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: Viability evidence
Our principal concern is that the Council does not appear to have undertaken any assessment as to the viability of the policies it is proposing in this consultation. The most recent evidence on the Council's website is the 2010 study prepared by Levvel for the London Commuter Belt (East)/M11 Sub Region. This study cannot be considered an appropriate evidence base to support the preparation of a local plan and the we would expect the Council to undertaken a full assessment of whole plan viability prior to any further consultation. Without this evidence the Council cannot support any of the policies in the consultation document which will place additional costs on the development industry in the Borough. As such the H5 Accessible and Adaptable Housing, H8 Affordable Housing and H9 Self and Custom Build Housing are not justified and cannot be considered to be sound.
In addition to concerns with regard to the lack of an up to date viability assessment supporting these polices, and in fact the whole plan, we also have concerns regarding the approach taken to each of these polices.

Change To Plan:

Full Reference: C - 6319 - 8450 - Housing - None

6326 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: The development of 10,000 homes at the Gilston Area will support the housing and economic needs of Harlow. By providing a wide range of private and affordable homes to rent or buy, the Gilston Area will help attract and retain skilled workers. Many of these will work in Harlow and provide the more diverse local workforce which has been identified as critical to developing the Harlow economy. The contribution that this will make should be recognised in the opening paragraphs of Chapter 3 which focus solely on the 9,200 homes to be delivered in Harlow.
Homes at the Gilston Area will also help rebalance the local housing mix. This is particularly true for the Harlow wards adjacent to East Herts which, whilst having high levels of social rented provision, offer very few intermediate options and limited professionally managed private rented homes.

Change To Plan:

Full Reference: C - 6326 - 7958 - Housing - None

6227 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: Policy H1 Housing Allocations: this Policy should also mention the need for connectivity of open space and green infrastructure, together with its accessibility to all users.

Change To Plan:

Full Reference: C - 6227 - 7887 - H1 Housing Allocations - None

6267 Comment **Respondent: Barton Willmore (Miss Emma Gladwin) [8399]** **Agent: N/A**

Summary: ii) Policy H1 Housing Allocations

3.20 As detailed in Section 2 above, Policy H1 states that development of the Strategic Housing Site and other sites for housing, as allocated in the Strategic Policies, will be supported. A Master Plan is required to be submitted for development of the Strategic Housing Site.

3.21 As outlined within Section 2, we raise an objection to Policy H1 as currently drafted as no other information is provided. As the Strategic Policies and the Proposals Map have not been published, there is no indication of where the Strategic Housing Site or other site allocations are.

3.22 There is also no detail regarding what form development will take on these sites and whether they are allocated for residential, retail, employment, recreation, or a combination of uses.

3.23 As currently drafted, Policy H1 has no substance and cannot be adequately considered or assessed.

Change To Plan:

Full Reference: C - 6267 - 8399 - H1 Housing Allocations - None

6295 Comment **Respondent: Dr Roger Bamford [8442]** **Agent: N/A**

Summary: This is a rather pointless policy as it stands as details of the strategic housing site are currently unknown. I assume this is because the development management policies have peculiarly been published ahead of the strategic ones.

Change To Plan:

Full Reference: C - 6295 - 8442 - H1 Housing Allocations - None

838

6268 Comment **Respondent: Barton Willmore (Miss Emma Gladwin) [8399]** **Agent: N/A**

Summary: iii) Policy H2 Residential Development
 3.24 Policy H2 recognises that there has been a small but constant supply of new housing on infill sites and garden plots, which can contribute to meeting local housing need, supporting such development subject to various criteria being met.
 3.25 Policy H2 recognises the constraints of the District and seeks to support residential development where it would be appropriate, in accordance with the NPPF. As such we support the aims of Policy H2 in encouraging residential development on suitable infill sites, garden plots, minor residential schemes and vacant plots.

Change To Plan:

Full Reference: C - 6268 - 8399 - H2 Residential Development - None

6284 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

Summary: Policy H2: Residential Development
 It is recommended that the historic environment is listed as an aspect for consideration in part (a). It is recommended that the supporting makes reference to the positive contribution open spaces and gardens can make a positive contribution to the character of an area and to the its distinctive townscape.

Change To Plan:

Full Reference: C - 6284 - 8441 - H2 Residential Development - None

6363 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: Criterion (b) refers to 'adopted vehicle parking standards' but does not make clear whether this means the Essex County Council parking standards (or others). This also applies to Policy H7.

Change To Plan:

Full Reference: C - 6363 - 8452 - H2 Residential Development - None

6254 Comment **Respondent: Mrs Giulia Festa-Burton [8436]** **Agent: N/A**

Summary: I am sorry, but this utter rubbish. If there is only a garden or field between estates, surely this would enrich the character of a residential area, hence creating a break to overcrowding. Instead, you state that where only one green area is still standing between estates or building, that area is very likely to be considered for development, hence allowing that overcrowding of building all crunched up and next to each other. This is unacceptable!

Change To Plan:

Full Reference: C - 6254 - 8436 - H2 Implementation - None

6208 Comment**Respondent: Morley Grove Residents Association (Sheila Sullivan) [5043]****Agent: N/A**

Summary: Note: This is a transcript of a scanned letter. See attachment for original letter.

I would like to make the following comments and contribution to your document. My particular concern has long been the issue of Houses in Multiple Occupation in Harlow (section H3 in your document). From personal experience in Morley Grove I know what a disastrous effect they can have on a neighbourhood in our town. Eventually, Harlow Council successfully took planning enforcement action and then established an Article 4 Direction withdrawing permitted development rights for HMOs in Morley Grove.

I, and many others, had hoped that the same protection would be established for the whole of the town, so that no property could be converted into an HMO without prior planning consent. However, despite the government's loosening of the rules on A4D in 2010 to facilitate such decisions, Harlow Council has not taken up that option.

I am therefore asking that your Development Plan includes the adoption of an Article 4 Direction withdrawing the permitted development rights of conversion from a house/flat into an HMO anywhere in Harlow. An A4D is essential to control the development of HMOs. It means that developers would need to apply for prior planning consent and the Planning Committee could make their decision based on the Council's policy. It would replace random development with development in appropriate locations and to the Council's requirements.

My justification for applying an A4D across the whole of Harlow is as follows. There is heavy pressure on existing housing in Harlow and, as your document confirms, this is a particularly true for large family homes (the very properties targeted by HMO developers). The town was originally designed to accommodate people in groups of properties and close communities. These were high density areas focussed on single families. Most of the housing was designed and built for single families and this is reflected in the covenants the properties carry which restrict use to single families only. Parking is a major problem in the town. Parking on pavements is a common sight in some areas and emergency services are challenged by blocked access. Noise transference between terraced properties is common and cannot be reduced easily. Housing in Harlow is largely in terraces.

Your document does not give enough weight to the importance of community cohesion. The dispersal of HMO properties around the town is uneven at present with some areas having runs of them. (I enclose a document which demonstrates the locations of currently licensed HMOs). Your threshold policy of 1 HMO in 5 is too high a proportion. I believe that only 1 in 10 in a street, as well as area, should be allowed to be converted into an HMO. Nationally this 10% threshold is the one most commonly adopted by local authorities. Harlow has special characteristics of design which mean 10% of properties converted to HMOs would be the most it could accommodate without adverse effects for the neighbours, neighbourhood and community cohesion.

Section H3

I would change your section H3 to read

The creation or conversion of a dwelling to a House in Multiple Occupation(HMO) will be supported where it meets all the criteria below:

- (a) the number of HMOs would not exceed one out of a row of 10 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 in an enclosed /covered storage area and collection from it.
- (d) parking is provided at a level of one space per bedroom, plus one secure covered cycle space per bedroom, and one car parking space for visitors and management use.
- (e) effective measures are proposed to minimise the effects of noise and disturbance.
- (f) property complies with Building Regulations.

In addition to changing the threshold (a) above, I have made two other changes to your list and added a sixth.

The unpleasant effects of careless handling and storage of refuse at HMOs are well known around the town (c). Requiring storage areas to be covered/enclosed would fit better with the Council's design requirements.

HMO tenants parking vehicles on the street and blocking access for others can be a major cause of concern and conflict. I am therefore pleased to see the Council is specifying a parking space for each bedroom. However, one additional parking space is needed for visitors and management use (d).

Minimising the effects of noise and disturbance (e) is more easily said than done in terrace houses in Harlow. The Planning Inspector's decision in the case of Morley Grove was that it was not possible, bearing in mind the noise transmission between houses.

For the safety of tenants, the property needs to comply with Building Regulations (f). This has been highlighted by the terrible tragedy of Grenfell Tower.

Implementation

Your implementation section acknowledges that current permitted development rights exempt conversion to small HMOs (3 to 6 unrelated persons) from requiring planning consent.

This means that none of this policy will apply to HMOs claiming to have only that number of unrelated occupiers. Experience has taught us that landlords easily move their tenants from one HMO to another to deal with inspections carried out to check on the number of people living in a property.

This policy will therefore only have any power of enforcement over small HMOs when an Article 4 Direction removing permitted development rights is established across the town.

In paragraph 3.18 the document makes reference to HMO Licensing which is carried out by Environmental Health. At present Harlow has established an Additional Licensing Scheme which licenses all HMOs not subject to the Mandatory Licensing Scheme. The Additional Licensing Scheme is time limited and due to finish in April 2020. If that scheme does not continue the Council will lose data about where HMOs are and so undermine the threshold policy.

Establishing the Article 4 Direction and withdrawing permitted development rights is the only way to ensure the Council can manage the growth of HMOs.

(See attachment for original letter and attached appendix.)

Change To Plan:

Full Reference: C - 6208 - 5043 - H3 Houses in Multiple Occupation - None

6239 Comment

Respondent: Mr & Mrs Andy & Janice Gee [8438]

Agent: N/A

Summary: I have lived in Harlow since 1955 and my Wife was born in the town a few years later. We have the upmost respect and regard for Sir Frederick Gibberd who's Master Plan has passed the test of time, proving Harlow with great living space with the green wedges and fingers. How much better Harlow would have been if his plan had been implemented for connecting the roads to the M11 north of the River Stort.

Our main comments to the Consultation Draft is with regard to Section H3 Houses with Multiple Occupancy. The initial comment we would like to make is that when our house in Collins Meadow was built in the nineteen fifties by the Harlow Development Corporation, a Covenant on the land states "Not to use any dwelling erected on the hereby transferred for purposes other than that of a single private dwelling-house in one occupation.....". The Covenant is transferred when the house is sold and still valid to the new owners. We also believe that this is the same for a lot of the properties built in Harlow at that time. Harlow Council took over from the Development Corporation and inherited their obligations with regards to Harlow's housing stock. We have an HMO on the opposite side of the road to us in Collins Meadow and we cannot understand how Harlow Council issued a licence some eighteen months ago, as an HMO for Six rooms, Six Occupancies with these Covenants we believe still in force. The reason we have been given for this is that as 'Harlow Council do not own this land then they cannot enforce this Covenant'. Our stance is that the protections put in by Harlow Development Corporation to protect our 'way of life' are not being honoured.

The next door neighbours to this HMO have suffered noise and disturbance due to open windows and more conversations and shouting in the rear gardens. Over occupancy on a regular basis, which has substantially increased the 'comings and going' to the property. The fire doors are slam shut and noisy and have been fitted to a house that was not designed for their use. We believe this could be a 'statutory nuisance' particularly at night. Any visit to the bathroom at night will result in the fire doors slamming shut four times. We have been more fortunate living opposite this HMO, than the next door neighbours, but we have still suffered with the non emptying of bins at times and the eye sore of six bins instead of two, and parking issues. We have had two major incidents where the police have been involved, the first a fight in the HMO with the loser being left for dead, and more recently an alleged knife threat! Cannabis smoking has been regularly occurring and the police have been taking action.

The Development Plan H3 mentions HMO's allowable (a) 'One in Five units', this would mean another three in our cul-de-sac, which would completely ruin life in this community. We welcome (d) 'parking is provided for one space per bedroom' as this should protect Collins Meadow, and we would think most area's of the town, from HMO's as most suffer a severe lack of parking.

The Councils own multi dwelling houses are generally detached properties, this keeps some of the noise from becoming a problem, as there are no next door neighbours. Our recommendation for HMO's is that Harlow Council do not issue licences for HMO's within a terrace. But we feel we have far too many already as we've noticed on the HMO Public Register there's over 200 at the moment and they are spoiling our town!

Finally we wish you good luck with the future development of Harlow, Sir Frederick Gibberd has set some very high standards.

Change To Plan:

Full Reference: C - 6239 - 8438 - H3 Houses in Multiple Occupation - None

6241 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: I strongly believe point d) is never met at present when landlords apply for HMO licence. Likewise on point a) the ratio should be increased to 1:10 in order to avoid overcrowding and in respect of local character of Harlow estates and areas.

Change To Plan:

Full Reference: C - 6241 - 8436 - H3 Houses in Multiple Occupation - None

743

6246 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: (h). By encouraging investors to apply for HMO licences, Harlow Council encourages an influx of transient tenant base in residential areas already family oriented. The transient nature of HMO tenants often encourages crime and higher levels of anti social behaviour, often due to the fact that landlords are not obliged to seek references for potential tenants.
(f) I have concerns that currently Harlow has very inadequate transport solutions in place both by rail and bus - already insufficient now, let alone with the increment of commuters to Harlow following regeneration.

Change To Plan:

Full Reference: C - 6246 - 8436 - H3 Houses in Multiple Occupation - None

6250 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: By allowing HMOs in existing residential areas, effectively Harlow Council allows a business to run next to residential properties, without even demanding for planning applications for change of use. This is unacceptable as HMOs are only detrimental to residents and residential areas.

Change To Plan:

Full Reference: C - 6250 - 8436 - H3 Houses in Multiple Occupation - None

6294 Comment**Respondent: Dr Roger Bamford [8442]****Agent: N/A**

Summary: Unfortunately this policy is rather weak compared to other councils who have much more detailed HMO policies and criteria for assessment. It would be appropriate therefore to revisit this policy and strengthen it.

Change To Plan:

Full Reference: C - 6294 - 8442 - H3 Houses in Multiple Occupation - None

6205 Comment**Respondent: Mr Andrew Whybrow [8423]****Agent: N/A**

Summary: Houses with multiple occupations tend to be owned by "dubious" landlords. There should be NO increase of that type of property. With the vast increase in building the need for HMO should be reduced & therefore the aim should be to reduce rather than increase numbers.

Change To Plan:

Full Reference: C - 6205 - 8423 - H3 Justification - None

6242 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: I firmly believe the use of HMO to alleviate the housing register overcrowded subscription as well as homelessness is only a palliative. HMO landlords are allowed to charge rent which is nearly double the Local Housing Allowance paid through Housing Benefits. Therefore, when tenants become unemployed, or if already unemployed at the point of renting an HMO room, they have no choice but to apply for Discretionary Housing Payments from their Housing Benefits entitlement - if this additional payment is not granted by Housing Benefits of Harlow Council, they then fall in arrears to then become homeless again.

Change To Plan:

Full Reference: C - 6242 - 8436 - H3 Justification - None

6243 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: The current policy of granting HMO licences does not look at the currently existing local amenities and characters of the surrounding houses within an estate. No consideration is paid to whether there is additional parking space for a potential minimum of 6 extra households in a street. And this can only bring further upset to the local residents.

Change To Plan:

Full Reference: C - 6243 - 8436 - H3 Justification - None

6262 Comment**Respondent: Mr Simon Burton [8439]****Agent: N/A**

Summary: In principle I can see the use of HMOs as part of the solution to decrease the number of applicants to the Housing Register or of homeless applicants. However criteria should be changed to include a ratio of 1 HMO property for every 20 single dwelling properties. This draft very much focuses on respecting the original plans set out by Sir Gibberd in designing this Town. As such, HMOs should not be allowed in properties that were purpose built for single dwelling, but new purpose built properties should be solely used for the purpose of multiple occupancy.

Change To Plan:

Full Reference: C - 6262 - 8439 - H3 Justification - None

6244 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: It is appalling that this Council will only enable Environmental Health to deal with the matter of granting HMO licences. All the above mentioned issues, including ensuring respect of local amenities and that not too many family homes are lost to what essentially is a business, should be overseen by Planning, and the two services should work alongside to ensure all these issues are avoided when issuing an HMO licence. I believe HMOs should all go through a planning applications, irrespective of the size and number of tenants.

Change To Plan:

Full Reference: C - 6244 - 8436 - H3 Implementation - None

6245 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: With the overall regeneration of Harlow and the introduction of new employment opportunities with the redevelopment of the former Nortel site and with PHE move to Pinnacles in a few years time, I can see how new housing formulae and opportunities may be needed. However I do not believe HMOs are the answer, as for the sake of encouraging business coming to Harlow from investors, existing residents are penalised. This is not acceptable, and the influx of leisurely granted HMO licences has to stop. Harlow is already overcrowded with HMOs, which bring only but disruption to residential areas.

Change To Plan:

Full Reference: C - 6245 - 8436 - H3 Implementation - None

6260 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: I see a neat discrepancy between the policy adopted by Housing to use detached properties for TA purposes when the houses are Council owned as there is an acknowledgement that TA properties can cause disruption to a neighbourhood, and the policy adopted by the Council in granting HMO licences to landlords who purchase terraced or semi detached properties for this purpose. It proves that Planning needs to be involved in the decision making and in the process to grant HMO licences in order to monitor the detrimental impact to the local community.

Change To Plan:

Full Reference: C - 6260 - 8436 - H3 Implementation - None

6261 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: HMOs are encouraged and facilitated at such an extent at the expenses to the well being of current local communities, that Planning do not even get involved when it comes to enforcing Restrictive Covenants for change of use from single to multiple dwelling.

Change To Plan:

Full Reference: C - 6261 - 8436 - H3 Implementation - None

6234 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: H5 Accessible and Adaptable Housing states that;

- All new dwellings must be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs.
- In addition, major residential development must provide a proportion of Building Control Part M4(3) standard dwellings for wheelchair users.

The need for such housing requirements is not evidenced. In the absence of supporting evidence the use of the optional standards on accessibility cannot be justified. As such the requirements relating to these standards in this policy should be deleted. Notwithstanding this, the proportion of M4(3) units sought is not clear. There is a need for a viability assessment to support the local plan and it should consider the implication of policy H5 on Accessible Housing. This optional standard will increase the cost of providing each dwelling. In particular the highest standard, M4(3), will add a substantial additional cost that must be assessed as part of the viability study. As such we do not consider either policy H5 to be adequately justified.

Change To Plan:

Full Reference: C - 6234 - 8437 - H5 Accessible and Adaptable Housing - None

6311 Comment**Respondent: Miller Homes [8449]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: In order to address these concerns, our client recommends that Policy H5 is amended to read:

"All new affordable dwellings must be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs. In addition, for major residential development, 10% of new affordable dwellings must be Building Control Part M4(3) standard (i.e. wheelchair user dwellings)."

Change To Plan:

Full Reference: C - 6311 - 8449 - H5 Accessible and Adaptable Housing - None

6320 Comment**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: The Council must provide more detailed evidence relating to the need for these optional standards. Planning Practice Guidance (PPG) sets out the evidence required to support the introduction of such policies and this must be considered by the Council if it is to justify this policy. The policy is also vague and does not provide the required certainty that will allow the development industry to consider the implications of this policy on development viability. If the Council can justify the need for this policy then it must set out the proportion of homes to the higher optional standard are required on major sites. At present this policy is not consistent with the NPPF which sets out in paragraph 17 the need for plans to provide a practical framework within which decision can be made with a high degree of predictability.

Change To Plan:

Full Reference: C - 6320 - 8450 - H5 Accessible and Adaptable Housing - None

Summary: Policy H5 relates to accessible and adaptable housing and would replace policies H7 & H8 of the Local Plan 2006.

The extant policy base (Policy H7) allowed for a negotiation to take place regarding the extent of accessible and adoptable housing to be provided on any specific site, enabling a mixed community to be created on any site, allowing for viability issues and ensuring accessibility to community facilities and shops. Policy H8 sought to allocate sites that would provide for such provision.

The emerging policy takes this policy position much further stating that all new dwellings must be accessible and adaptable dwellings, in accordance with Part M4(2) of the Building Regulations.

There is a requirement under Building Regulations for all properties to meet Part M4(1), with Part M4(2) being an optional requirement. The policy requirement for all dwellings to comply with an optional Building Regulation requirement is not therefore justified.

The Strategic Housing Market Assessment (SHMA) 2015 acknowledges that the increase in people over 65 equates to three-quarters of the growth identified within the Housing Market Area. It also Page 2 of 4

states that "most of these older people will already live in the area and many will not move from their current homes". On this basis, to require all new homes to comply with Part M4(2) is disproportionate to the likely need within the plan period.

Furthermore, the application of this requirement across all dwellings, within all developments will undermine the principles of high quality design required by the NPPF and the adopted Harlow Design Guide.

Looking at the parking requirements associated with Part M4(2), each standard parking space associated with each Part M4(2) compliant property needs to be widened from the Essex Parking Standard requirement of 2.9m to 3.3m. The parking sizes are already considered to be land hungry, with any further increases in size further eroding the ability to deliver developments that do not appear overly car dominant. To quantify the impact of this element of the policy proposed, for a residential development constructed at an average density of 35dph, the increased parking space size will result in the loss of 1 dwelling per hectare of development.

The additional requirement of full step free access to entrances and shallow gradients being applied creates a flat, lifeless environment with no articulation.

The need to introduce ramps and lift shafts to developments further increases the amount of land required per dwelling and erodes flexibility in design.

The SHMA acknowledges that the application of Part M4(2) should only occur where viability is not compromised. This position is not reflected in the proposed policy wording, which makes no allowance for viability to be discussed.

By way of example, Part M4(2) requires a step-free access to be created for each dwelling, irrespective of the storey upon which it is located. If this is applied to a flatted development, each and every flat block would require an lift to be installed, regardless of height. Similarly in instances where the sub-division of an existing dwelling is proposed, forming 1 no ground floor flat and 1 no first floor flat, a lift would be required.

The increase in cost associated with the installation of a lift will no doubt dissuade people from subdividing their properties, and will challenge the viability of many mid-scale developments within the District. Or lead to a reduction in the mix of housing being offered on each site to maximise viability.

The requirements of Part M4(2), when applied across an entire development site, result in a significant loss of development land, such that meeting these standards will result in either a reduction in the number of dwellings being delivered per hectare, an increase in height of development or, worse case scenario, a reduction in the number of developers wishing to develop in the District due to the policy requirements being overly onerous. Of course the latter will raise significant issues in obtaining a consistent 5 year land supply and potentially even being able to demonstrate that future sites are deliverable.

Given the level of growth required in Harlow, along with the boundary constraints associated with the New Town, this extent of loss on all development sites will significantly reduce the ability to meet the OAHN and in turn place additional pressure on less suitable sites.

Emerging Policy H5 goes on to state that the even more onerous requirement of Part M4(3) should be achieved across 10% of market housing and 15% of affordable housing. Again this is based on information within the SHMA 2015, in which it states: "the evidence therefore supports the need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements".

The SHMA seemingly fails to provide the stated evidence to support this position. There is no localised information available in respect of disability data, however, the national figures for England show that around 1 in 30 households (3.3%) have at least one wheelchair user, with this being significantly higher for affordable housing at 7.1%. The SHMA fails to provide any indication as to how this trend has changed over recent years, that would in turn enable an assessment, as to likely increase, to be made over the plan period. The SHMA merely concludes that the existing 3.3% should increase by a huge 6.7% and the affordable housing requirement by 7.9%.

When based on an average development size of 100 residential units with 30% affordable housing, this would equate to a 330% increase in provision over the existing 1 in 30 dwelling identified within England to date.

Whilst the provision of clear guidance in a policy is welcomed, it does need to be reasonable, substantiated and not result in development being unviable.

It is noted that Harlow District Council has yet to undertake (or publish) a viability assessment in respect of the overall emerging Plan, presumably as a result of the Plan still being formulated. It is therefore considered that this policy is premature and its impact cannot be fully understood without a complete picture of viability being ascertained in the first instance.

It is noted that the equivalent policy within the, now submitted, East Hertfordshire District Plan (Policy HOU7) contains a viability clause as recommended by the SHMA, it states: "II. 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 the requirement." If this emerging policy is to be retained, a viability clause should be included.

Lastly, Government Policy specifically warns against reference to non-planning legislation, as other legislation/standards are subject to regular change and results in planning policy becoming out of date quickly. This was seen with the changes to the Code for Sustainable Homes and Authorities with specific policies found themselves with unenforceable policies, conditions and legal agreements.

Certainly in respect of Part M, changes were introduced in 2015 which incorporated the accessibility requirements M4 (1) (2) & (3). These changes superseded the Code

for Sustainable Homes and the Design and Quality Standards, amongst other technical standards. The Code for Sustainable Homes was adopted in 2006, lasting only 9 years before it was replaced with the revised Part M requirements. The revised document incorporates some elements of the standards it replaced but is not readily transferable and as such many Local Plan Policies were rendered out of date and unenforceable. It is considered highly likely that this policy will result in a significant amount of viability questions in respect of future development and without some form of amendment to enable a discussion on this point to be had, may lead to a shortfall in housing development, or an increase in appeals. Furthermore, the regular change in building regulations is likely to result in the policy being defunct within the early stages of the plan period. This policy is considered to be flawed, it is therefore recommended that it be deleted to ensure housing development can be readily delivered.

Change To Plan:

Full Reference: C - 6334 - 70 - H5 Accessible and Adaptable Housing - None

CHAPTER: HOUSING H5 Implementation

6339 Comment Respondent: Home Group (Jessica Watts) [8445] Agent: N/A

Summary: Home Group supports the Council's intention to ensure new properties are accessible for all future occupiers. We presume the Council will specify on a site by site basis whether the proportion of homes to the Part M4(3) standard are to be adaptable or adapted as per the Regulations, based on known housing needs at that time? Establishing specific users during the planning process is key to optimising occupation.

Change To Plan:

Full Reference: C - 6339 - 8445 - H5 Implementation - None

CHAPTER: HOUSING H6 Housing Mix

6364 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452] Agent: N/A

Summary: This policy, which is important to ensure a balanced housing stock and market, is very brief and light on detail. Clearer references for developers on what types / sizes of homes are required would be beneficial and a specific reference within the policy to the relevant evidence base (SHMA / housing needs survey) would be beneficial. It also does not mention specialist housing requirements or independent living (refer to ECC Independent Living programme).

Change To Plan:

Full Reference: C - 6364 - 8452 - H6 Housing Mix - None

CHAPTER: HOUSING H6 Justification

6255 Comment Respondent: Mrs Giulia Festa-Burton [8436] Agent: N/A

Summary: Private developments focus on 2 bedroom or bigger properties, whereas there still seem to be a need for 1 bed self contained flats or studio flats, for that group of single adults towards whom the Council does not have duty of care for homelessness, but who have no alternative but to rent HMO rooms. This gives way to an increased demand for rooms, when in fact HMOs bring only disruption and anti social behaviour. Once again the Council does not think of the long term consequences of immediate solutions, at the detriment of existing residents.

Change To Plan:

Full Reference: C - 6255 - 8436 - H6 Justification - None

749

6206 Comment

Respondent: Mr Andrew Whybrow [8423]

Agent: N/A

Summary: No planning permissions should be granted where a developer intends to sell a house subject to an increasing Ground Rent. That type of development should not be welcome in the Town.

Change To Plan:

Full Reference: C - 6206 - 8423 - H6 Implementation - None

6365 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This reference is very brief and light on detail. Clearer references for developers on what types / sizes of homes are required would be beneficial and a specific reference within the policy to the relevant evidence base (SHMA / housing needs survey) would be beneficial. It also does not mention specialist housing requirements or independent living (refer to ECC Independent Living programme)

Change To Plan:

Full Reference: C - 6365 - 8452 - H6 Implementation - None

6285 Comment

Respondent: Historic England (Ms Katie Parsons) [8441]

Agent: N/A

Summary: Policy H7: Residential Annexes
It is recommended that this policy requires development to have regard to the character of the surrounding area, it is noted that this is referred to in the supporting text but only in the context of intensification of use and not in the implications for the physical environment.

Change To Plan:

Full Reference: C - 6285 - 8441 - H7 Residential Annexes - None

750

6213 Comment**Respondent: Mr Gary Roberts [8432]****Agent: N/A**

Summary: I have just read the proposed Local Development Plan for Harlow and in particular section H8 on Housing.

Having been a Harlow Council tenant for some 33 years and involved in tenant issues for at least 27 of those years I would make the following points on the housing plan:

The right to buy council homes should be stopped immediately or failing that the period of right to buy Harlow Council homes be increased to at least 20 years,

Harlow Council should receive 50% of all "affordable" housing built by private construction developers in Harlow and not 30%,

The proportion of "affordable" homes built for council rent should be increased from the stated 3,400 to at least 4,200,

The infrastructure to deal with this increase in housing should be professionally assessed and implemented before any housing development is approved.

I hope these views will be included in the final consultation document and a copy of that document forwarded to me when complete.

Change To Plan:

Full Reference: C - 6213 - 8432 - H8 Affordable Housing - None

6235 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: H8 - Affordable Housing.

The Policy states 'Major residential development will be supported where affordable housing is provided at a rate of at least 30%'. This policy is too imprecise as to the level of affordable housing sought. At present this policy is not consistent with the NPPF which sets out in paragraph 17 the need for plans to provide a practical framework within which decision can be made with a high degree of predictability.

Change To Plan:

Full Reference: C - 6235 - 8437 - H8 Affordable Housing - None

6269 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: iv) Policy H8 Affordable Housing

3.26 Whilst the aims of Policy H8 of providing needed affordable housing across the District are supported, the policy states 85% should be affordable rent and the remaining 15% should be intermediate affordable housing.

3.27 No reference is made to 'starter homes' and whether HDC will be including these within the 15% intermediate affordable housing, with starter homes not referenced throughout the DM Policies document.

3.28 The Housing White Paper published earlier this year was clear that Local Authorities are expected to deliver starter homes as a mixed package of affordable housing. Rather than set a threshold, the Government announced Local Authorities will be required to promote starter homes and work with developers for their provision.

3.29 These aims should be reflected within Policy H8, clearly identifying what HDC will be expecting from developers in terms of affordable housing.

Change To Plan:

Full Reference: C - 6269 - 8399 - H8 Affordable Housing - None

6312 Comment **Respondent: Miller Homes [8449]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**
Summary: Our client submits that until such time that HDC is able to publish the Local Plan in its entirety, including supporting evidence to demonstrate viability (both in terms of overall affordable provision and any preferred affordable split), Policy H8 should only seek "up to" 30% affordable housing, rather than "at least" 30%.
Change To Plan:

Full Reference: C - 6312 - 8449 - H8 Affordable Housing - None

6321 Comment **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**
Summary: Similarly the policy on affordable housing must also send out clear signals to the market about the Council's intentions. By stating that the Council will require "at least 30%" of major residential development to be affordable homes suggests that in some circumstances a higher proportion may be required. This does not meet the principles set out in paragraph 17 as highlighted above and makes it difficult for the development industry to be sure as to the actual costs of bringing a site forward in Harlow. We would also suggest that the Council ensures that this policy reflects national guidance on planning contributions for affordable housing to ensure clarity and support predictable decision making.
Change To Plan:

Full Reference: C - 6321 - 8450 - H8 Affordable Housing - None

6327 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**
Summary: We suggest that an additional paragraph is added under the Implementation text of policy H8 (affordable housing) stating that:
"Major sites outside the district, including the Gilston Area in East Herts, 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 home, 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".
Change To Plan:

Full Reference: C - 6327 - 7958 - H8 Affordable Housing - None

6335 Comment **Respondent: Countryside Properties Plc [70]** **Agent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]**
Summary: Policy H8 sets out the Council's affordable housing requirement of 30%, which is not objectionable and is supported by the SHMA. The need for 30% affordable housing to be provided on all major residential sites is however contrary to National Planning Policy Guidance. For the purposes of affordable housing provision, there is a distinct difference drawn between the Town and Country Planning (Development Management Procedure)(England) Order 2015 definition of major development and Government guidance on the 10-unit threshold, which requires affordable housing only to be provided on schemes of 11 units or more. The policy should be amended to reflect the NPPG.
Change To Plan:

Full Reference: C - 6335 - 70 - H8 Affordable Housing - None

6340 Comment **Respondent: Home Group (Jessica Watts) [8445]** **Agent: N/A**
Summary: Home Group supports the Council's policy to require this level of affordable housing in the borough as we recognise the housing need for lower cost homes in the area. We also support the provision of these homes on site where possible as it helps create a mixed and sustainable community.
Change To Plan:

Full Reference: C - 6340 - 8445 - H8 Affordable Housing - None

6236 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: H9 Self-build and Custom-build Housing

This policy sets out that all allocated sites must include an element of serviced plots for self-build housing. The policy provides no indication as to the amount of self-build plots that will be required from allocated sites. This makes it impossible to assess the impact on viability of this policy. We would suggest that the Council first considers the evidence of the need for self-build plots using its statutory register as this would give an indication as to the number of self-build plots required. From this starting point an appropriate evidence based strategy for supporting self and custom-build housing could be developed.

We consider the two year time frame for commencement before the plots revert to conventional development to be too long. If there is a demand for such units as evidenced by the Council's self-build register there should be very little delay in the plots being acquired a development commenced. We would suggest that the time frame is reduced to 12 months.

Change To Plan:

Full Reference: C - 6236 - 8437 - H9 Self-build and Custom-build Housing - None

6270 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: v) Policy H9 Self-Build and Custom-Build Housing

3.30 Policy H9 requires an element of serviced plots for self-build housing to be included within the development of allocated sites. Development of the self-build plots must commence within 2 years of completion of the related phase of the allocate site, otherwise they may revert to conventional development and marketing.

3.31 Policy H9 does not currently provide any clarity regarding the level of self-build housing that will be required on allocated sites, only stating an 'element' will be required. It is not clear if the level of self-build housing will be identified on a site-by-site basis when further detail is given on the site allocations, but at present Policy H9 requires considerable negotiation and no indication of what HDC would expect.

3.32 Furthermore, whilst the principle of allowing self-build plots to revert to conventional development and marketing if they are not commenced within 2 years is supported, Policy H9 does not currently contain any requirements for developers to have adequately marketed the plots in the intervening period. This could result in plots being left for 2 years then automatically becoming conventional development plots, restricting the delivery of self-build housing within the District.

Change To Plan:

Full Reference: C - 6270 - 8399 - H9 Self-build and Custom-build Housing - None

6313 Comment**Respondent: Miller Homes [8449]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: Policy H9 directs that allocated sites must include "an element" of serviced plots for self-build, unless this would render the development unviable. Where serviced plots have not commenced within two years of the relevant phase of the site, they may revert to conventional housing.

Our client submits that until such time that HDC is able to publish the Local Plan in its entirety, including supporting evidence to demonstrate viability (both in terms of overall affordable provision and any preferred affordable split), Policy H8 should only seek "up to" 30% affordable housing, rather than "at least" 30%.

Change To Plan:

Full Reference: C - 6313 - 8449 - H9 Self-build and Custom-build Housing - None

6322 Comment**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: This policy sets out that all allocated sites must include an element of serviced plots for self-build housing. Such an approach is ineffective and unjustified. Firstly, the Council does not appear to have considered that some allocated sites may well be a purely flatted development. On such sites it would not be possible to deliver any self-build units and the Council should ensure such sites are not required to include an element of self-build plots. Secondly, the policy provides no indication as to the amount of self-build plots that will be required from allocated sites. This makes it impossible to assess the impact on viability of this policy. We would suggest that the Council first considers the evidence of the need for self-build plots using its statutory register. This would then give an indication as to the number of self-build plots required. From this starting point an appropriate evidence based strategy for supporting self and custom-build housing could be developed.

We also consider the two year time frame for commencement before the plots revert to conventional development to be too long. If there is a demand for such units as evidenced by the Council's self-build register there should be very little delay in the plots being acquired a development commenced. We would suggest that the time frame is reduced to 12 months.

Change To Plan:

Full Reference: C - 6322 - 8450 - H9 Self-build and Custom-build Housing - None

CHAPTER: HOUSING

H10 Travellers' Pitches and Plots

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6286 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy H10: Traveller's Pitches and Plots
We welcome the policy provision which requires development consider that the character of the locality but recommend that the historic environment is also listed as a consideration in part (a).

Change To Plan:

Full Reference: C - 6286 - 8441 - H10 Travellers' Pitches and Plots - None

CHAPTER: HOUSING

H10 Justification

6194 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: Re Travellers Pitches at Fern Hill Caravan site-that users of the pitch pay to use it in regards to rubbish pick up & any supplies of lighting & any water & electrical usages including sewage, & for general maintenance to keep it clean. As best I know, travellers don't pay Council Taxes but they should be made to pay a sum,however nominal, to use the facility. People generally don't appreciate stuff they get for free & then take it for granted; even if they paid a nominal sum, it would help stop deterioration.

Change To Plan:

Full Reference: C - 6194 - 8418 - H10 Justification - None

6211 Comment **Respondent: Sport England (. Laura Hutson) [8431]** **Agent: N/A**

Summary: Prosperity policies - Economic development

Sport England wishes to highlight the fact that sport makes a very substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.

Change To Plan:

Full Reference: C - 6211 - 8431 - Prosperity - None

6216 Comment **Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]** **Agent: N/A**

Summary: Starter units for small business must be included and encouraged.

Job opportunities must be encouraged and a wide range of opportunities not just jobs for retail, cleaning and low skilled posts.

Change To Plan:

Full Reference: C - 6216 - 27 - Prosperity - None

6371 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: From a Public Health and other perspectives, ECC would encourage Harlow, due to the current local Health profile in relation to obesity in both adults and children, to consider how best to plan to support reducing the obesogenic environment. This could be through design or policy implementation i.e. via an A5 uses restriction policy (or incorporation of such restrictions within the appropriate shop units regulation policies

Change To Plan:

Full Reference: C - 6371 - 8452 - Prosperity - None

6287 Comment

Respondent: Historic England (Ms Katie Parsons) [8441]

Agent: N/A

Summary: Policy PR1: Development within Employment Areas
This policy is based on Sir Fredrick Gibberd's design for Harlow Town which separated land uses. Consideration of the designed town and its distinct plan should help preserve its historic interest.

Change To Plan:

Full Reference: C - 6287 - 8441 - PR1 Development within Employment Areas - None

6366 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Appropriate 'sui generis' uses which share characteristics of light or general industrial development including the use of warehousing should be included in the list of appropriate use classes contained within clause a) of this policy (B1, B2, B8). It is not considered appropriate to include 'sui generis' uses within clause b) which would be the outcome of omitting them from clause a).

ECC is broadly supportive (from an Economic Growth and Regeneration perspective) of the PR1 policy to protect development within designated employment areas and supportive of the variety of information that would be required to support the development of non-B-Class uses. However we believe, in conjunction with colleagues from INVEST Essex, that the requirement to market the site for a minimum of 1 year is not enough to demonstrate that site has been marketed sufficiently for B-Class use as this does not account for variances in market performance and during potential downturns in the market it may take more than 1 year to adequately market the property. In addition we have noted that Local Authorities such as Basildon Borough Council have stipulated a minimum requirement for marketing vacant B-Class premises for a minimum period of 2 years. We therefore believe that Harlow's policy could be increased to require a minimum period of marketing a vacant B-Class property for a period of no less than 2 years.

ECC has developed robust evidence around the need for 'Grow On Employment space'. Neither of these policies (or others) refer to this requirement, which is identified in the interests of sustaining and growing the economy. ECC can provide standard text for this section, which has been adopted by other Essex authorities.

Change To Plan:

Full Reference: C - 6366 - 8452 - PR1 Development within Employment Areas - None

6381 Comment**Respondent: Lichfields (Mr Harry Bennett) [8454]****Agent: N/A**

Summary: We are generally supportive of this draft policy but have a number of concerns as outlined below.
 Policy PR1 states that development in employment areas for uses other than B1, B2 and B8 will be supported if it meets a number of criteria, including B(ii). This states that:
 "The development will increase the number of jobs for local r*esidents" (Our emphasis)
 We are concerned with B(ii) as drafted as there is not clear what is meant by 'local residents'. Does this mean that only jobs created for the residents of Harlow District will be relevant?
 The reality is that Harlow sits within a wider labour catchment area and attracts employees from within this area which will extend beyond the district boundary. Does this mean that any jobs filled by staff not resident in the District will not be taken into account? How will this be assessed? How will an employer know at the outset where his staff will live? Our client's site sits adjacent to the boundary with East Herts DC- some employees might be expected to travel from this District into Harlow to our client's proposed development. Should these jobs be ignored when assessing this policy?
 We would suggest that this criteria be reworded to read
 "The development will increase the number of jobs"
 In addition, the adopted Harlow Design Guide SPD (Oct, 2011) states at paragraph 4.6.2 the following:
 "The Local Plan also encourages the regeneration, modernisation and intensification of existing employment sites ... "
 This support for the intensification of existing employment sites should be reiterated in Policy PR1 for the avoidance of doubt.
 We suggest that an additional criteria (c) be added as follows:
 "where it involves the regeneration, modernisation and intensification of existing employment sites subject to a consideration of other policies in the Local Plan"

Change To Plan:

Full Reference: C - 6381 - 8454 - PR1 Development within Employment Areas - None

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CHAPTER: PROSPERITY

PR2 Development within Neighbourhood Service Areas

6368 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: In line with the comments with regard to policy PR1, we suggest that the minimum period for marketing of vacant units could be increased to 2 years.

Change To Plan:

Full Reference: C - 6368 - 8452 - PR2 Development within Neighbourhood Service Areas - None

6367 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC has developed robust evidence around the need for 'Grow On Employment space'. Neither of these policies (or others) refer to this requirement, which is identified in the interests of sustaining and growing the economy. ECC can provide standard text for this section, which has been adopted by other Essex authorities.

ECC supports this policy.

Policy PR3 sets out a range of criteria to prevent the loss of waste uses (amongst others) outside of employment areas. Waste uses are safeguarded through Policy 2 of the adopted Essex and Southend-on-Sea Waste Local Plan 2017, which forms part of the Development Plan of Harlow. Policy 2 of the Waste Local Plan sets out different criteria to those in Policy PR3 and therefore references to waste uses within Policy PR3 must be removed. It would be helpful to amend the supporting text to this policy to clarify that redevelopment proposals that would result in the loss of waste uses or infrastructure would be covered by Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017.

In line with comments in relation to PR1 and PR2 above, we suggest that the minimum period for marketing of vacant units could be increased to 2 years to ensure units have been adequately marketed.

Change To Plan:

Full Reference: C - 6367 - 8452 - PR3 Employment Development outside Employment Areas and Neighbourhood Service Areas - None

6314 Comment

Respondent: Miller Homes [8449]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]

Summary: Although our client supports the principle behind this policy, i.e. to get local residents back into work and to improve their skills level, additional information is required to explain how these obligations could work in reality and the level of obligation likely to be sought. Furthermore, while our client is keen to encourage the "employment of local people", it is debatable whether they (or their contractors or subcontractors) could solely select employees from a particular geographical area, without being deemed to discriminate unlawfully against those living further afield.

Change To Plan:

Full Reference: C - 6314 - 8449 - PR4 Improving Job Access and Training - None

6369 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC supports this policy and the approach set out in the supporting text. This applies particularly for the construction sector, given its importance and for effective growth delivery. There will be a need to develop and improve both capacity and skills in this sector. Accordingly, ECC would support reference to the use of the authority placing enforceable developer responsibilities on Skills in the construction sector.

Change To Plan:

Full Reference: C - 6369 - 8452 - PR4 Improving Job Access and Training - None

6382 Comment

Respondent: Lichfields (Mr Harry Bennett) [8454]

Agent: N/A

Summary: Paragraph 4.23 relating to the implementation of Policy PR4 states that:
"The policy will be applied to major development and secured through a planning obligation, 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..." (Our emphasis)
We submit that the wording be changed as follows:
"The policy will be applied to major development and secured through a planning obligation, tailored to individual schemes. Where possible, applicants should prepare an action plan setting out a schedule of new job opportunities to be created through the proposed development..." (addition in bold)
Our concern is that particularly in relation to outline applications the applicant will not know what the exact job opportunities will be as this will be subject to the occupier.

Change To Plan:

Full Reference: C - 6382 - 8454 - PR4 Improving Job Access and Training - None

759

6292 Comment

Respondent: Anglican Deanery of Harlow (Revd Martin Harris) [8345]

Agent: N/A

Summary: I would especially like to commend the following paragraph:

"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."

Indeed, I affirm the policy of where possible directing business etc towards the town centre rather than out of town. This is important for

- developing community
- encouraging healthy life style (easier to walk)
- a greener economy - less driving required

I appreciate that it is not always possible to achieve these aims alongside the need to attract business. However, positive incentives / disincentives in this direction are ways to help this take place.

If possible, more 'joined up thinking' for town centre parking and business would be helpful. Eg Harvey Centre parking with discounts for shoppers. I believe this exists in measure but it is not well advertised eg for cinema goers

Thank you for your consideration

Change To Plan:

Full Reference: C - 6292 - 8345 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

6302 Comment**Respondent: Ms Sue McDonald [8446]****Agent: N/A**

Summary: MY comments on this consultation Document focus on Harlow's Town Centre because the English Heritage and CABE Urban Panel's report following their 2006 visit strongly emphasised that "the defects in the town centre must be corrected first before development outside it is encouraged".

Nevertheless the Council this March agreed a massive increase in population in and around Harlow without any proposals for a strategy to improve the town centre which has continued to decline since the Urban Panel's visit eleven years ago.

After the Government stopped further development by the HDC in 1980, dissolved the Corporation, sold off the land, stripped the town of its lucrative assets, leaving the Council with the housing and pavements, the Council's spending has been kept to a minimum.

In its present condition there is plentiful evidence in the Press and Social Media that many citizens of Harlow regard their town centre as without attraction and it is not likely to attract a new population around who will simply use the new infrastructure to drive elsewhere with no benefit to Harlow.

Recent developments have shown that Harlow is at present unable to attract high class retail units and the retail marketing world is changing. Consumers are increasingly looking to spend their money on experiences rather than things. A radically different solution is needed to give Harlow Town Centre the attraction it needs.

The Council does own the last significant public space since the Civic Square disappeared - the Market Square and adjoining paved areas. Over these a Crystal Palace / Winter Garden pavilion could arise containing, for example, quality restaurants, art and handicraft shops, designer clothes boutiques (a specialist market providing a quality shopping experience) exhibition space for Enterprise Zone products or activities, space for musical events, together with exotic planting areas. Such an ever changing, transparent, sparkling yet protected environment at all times of the year would have special attraction.

The last scheme designed by Sir Frederick Gibberd in 1978/9 was a glass-walled Winter Garden in West Square to which the Council "made no objection but decided not to support it financially" (see page 147 of A Civic History of Harlow Council by Ron Bill). Naturally without financial support it came to nothing.

The type of Pavilion I have described could be quickly constructed and relatively light but the cost of commissioning the design and constructing such a building, which needs to be of the highest quality, would be considerable. If, the Government really regards Harlow as acting as the centre of the expansion it now requires, having recently designated it a "Garden Town" and referred to its "new elevated position", if these are not merely words, should it not be prepared to help Harlow meet this challenge of making the Town Centre attractive by providing the financial means?

No developer will do this; the initiative needs to come from the Council under its new executive. Many in the town are already longing for the Council to embrace a new vision and will work with them to achieve it.

"The unique artistic inheritance which Harlow has should not be underplayed". This final quote from the Urban Panels report is relevant because this aspect of Harlow's life has continued to flourish throughout its seventy years. Since the Development Corporation's work was stopped the Arts Trust has continued to place sculpture throughout the town; I took over the lease of the Gibberd Office and ran it as a town centre gallery for three years; the Playhouse had exhibitions; the Gibberd Gallery opened in 2004 and the art community at Parndon Mill has thrived, as have the Gibberd Garden and the ARC in Old Harlow. Clearly there is abundant creative talent in the town to underpin such development as I have described.

Harlow needs a rebirth if it is not to become a dormitory town. I hope the Council will rise to the challenge.

Change To Plan:

Full Reference: C - 6302 - 8446 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

6370 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC supports this policy.

Change To Plan:

Full Reference: C - 6370 - 8452 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

6197 Comment Respondent: Miss Sally SallyAnn Simpson [8418]

Agent: N/A

Summary: This is a self-justification based on the balls-up of the loss of the M&S store & subsequently also applies to Monsoon & lack of any other slightly more upmarket shops. Turning these large store spaces into smaller units is a piece-meal approach. What is needed is to attract larger shopping "outlets" into the town centre; with current growth in population in the area, the argument to would-be retailers is already extant; many people come from Hertford & Sawbridgeworth etc to shop in Harlow rather than go to over-crowded Brookfield in Cheshunt & this shopping footfall is lost in Harlow at present.

Change To Plan:

Full Reference: C - 6197 - 8418 - PR7 Justification - None

6343 Comment Respondent: Home Group (Jessica Watts) [8445]

Agent: N/A

Summary: Home Group are in support of the Council's drive to keep street frontage in town centres to primarily A1 uses. However it is encouraging to see that a pragmatic approach is being taken to the inclusion of other use classes, including C3, on upper floors in these areas as we believe it there is potential to create vibrant and active neighbourhoods by cleverly combining uses in this way.

Change To Plan:

Full Reference: C - 6343 - 8445 - PR8 Primary and Secondary Frontages in Neighbourhood Centres - None

6256 Comment Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: All hatches, bar Clifton Hatch which has recently been regenerated, need remodernising and attract viable and needed business. The current state of disrepair of certain hatches, like Slacksbury Hatch, only attracts anti social behaviour through the state of abandonment of some units and through the use of other units for businesses not needed, at the detriment of other retail or business projects that may be more justified in respect of the needs of the local community to the actual individual hatch.

Change To Plan:

Full Reference: C - 6256 - 8436 - PR9 Development in Hatches - None

6372 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC supports in general terms the intentions of this policy. However, ECC would also raise an issue for 'Hatches' in terms of A5 uses (takeaway food) being within close proximity (400m) of schools. This conflicts with ECC Public Health current advice and that of some Public Health national policies.

Change To Plan:

Full Reference: C - 6372 - 8452 - PR9 Development in Hatches - None

6199 Comment Respondent: Miss Sally SallyAnn Simpson [8418]

Agent: N/A

Summary: Thinking "outside the box" might be appropriate here-by asking retailers in the Retail Parks to also have a small store in the Town Centre, eg Argos already has a small outlet in the Harvey Centre & well as being in one of the retail parks.This would re-focus shoppers & those unable to get to retail parks without cars & there are certainly no busses! This would help everybody,retailers picking up footfall in the shopping centre & pedestrian shoppers being able to access these retailers, also alleviating parking & traffic problems at retail parks.

Change To Plan:

Full Reference: C - 6199 - 8418 - PR10 Implementation - None

6198 Comment Respondent: Miss Sally SallyAnn Simpson [8418]

Agent: N/A

Summary: The Council over-stepped its mark on helping young people at present with the obvious disappearance of "The Square" & no replacement viable or permanent musical facility/ies provided.Harlow used to be known as a music centre in the 1970s,people would come on coaches to attend concerts & musical events.Music clubs & venues are a viable evening activity for young & old alike & should be seen as a significant cultural contribution to the town's image, this has been destroyed by present 'implementation'. The Town Centre is NOT RESIDENTIAL so any noise from musical establishments is not a significant concern.

Change To Plan:

Full Reference: C - 6198 - 8418 - PR11 Implementation - None

763

6217 Comment Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]

Agent: N/A

Summary: Encouragement of differing lifestyles must be enhanced as the town develops. Seeing recreation land listed within the Local Plan details is seriously concerning that, like the rugby club, land is proposed for development.

Change To Plan:

Full Reference: C - 6217 - 27 - Lifestyles - None

6373 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Section 5 for lifestyles makes very little reference to health with the exception being related to green space access. Healthy environments go very much beyond this scope and in its current form, ECC Public Health would not support this plan.

Change To Plan:

Full Reference: C - 6373 - 8452 - Lifestyles - None

6336 Comment**Respondent: Countryside Properties Plc [70]****Agent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]**

Summary: Policy L1 is supported by the Harlow Design Guide, which assists in layout and design of facilities to be provided, alongside the Open Space, Sport and Recreation SPD 2007 and the Playing Pitch Strategy 2009, the latter of which forms part of the Local Plan evidence base.

Both the SPD and Playing Pitch Strategy are significantly out of date, they pre-date the NPPF and do not reflect recent developments within the District including, new sports pitches, the re-location of Harlow Rugby Club, planning approvals for new pitches and associated pavilions/changing facilities, or potentially a shift in the sports clubs currently operating.

Without an up to date evidence base supporting this proposed policy, there is little scope for ensuring that appropriate or adequate provision can be made, or more importantly if there is a demonstrable need for further provision. For example, it is understood that there is current vacancies within the allotments within Harlow, should additional provision be made, if there is a lack of need within the District generally.

Similarly, given the need to upgrade existing provision within the District, would it be more preferable for contributions to be made to allow for these facilities to be upgraded and therefore of greater benefit to the wider community, than providing additional facilities that may not be required.

It is considered that this policy is premature and lacks a robust evidence base to ensure developments deliver facilities that meet a demonstrable need. The content of the policy should be revisited to enable a more appropriate and flexible approach to be taken to provision of open space and sports facilities etc, to enable improved facilities to be provided, as well as meeting a demonstrable need.

Taking such an approach could maximise the amount of development that could be accommodated on any one site, where off site contributions are considered more preferable, over on site provision.

Change To Plan:

Full Reference: C - 6336 - 70 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6210 Comment**Respondent: Sport England (. Laura Hutson) [8431]****Agent: N/A**

Summary: L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities

Sport England welcomes the general aim of this policy, however would suggest some changes are made to the wording of this policy in order to ensure full compliance with the NPPF

In terms of the first part of the policy, 'evidence of a demonstrable need' must refer to the new Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS), in order to avoid less robust and up to date evidence being provided.

In terms of the second part of the policy, the PPS and BFS should once again be referred to as suitable evidence that the use and/or facility is surplus to requirements and an alternative replacement is not required, in order to avoid other less robust forms of evidence being put forward.

The NPPF (para 74) is clear on the need for such an assessment.

Point 2c should also read 'such a development is ancillary AND will support and enhance the existing use and/or facility'.

The final point (2d) should be reworded in order to clarify that the development is for alternative sports provision where the loss of a sporting facility is proposed, the needs for which clearly outweigh the loss, as per NPPF paragraph 74.

Sport England therefore objects to the Local Plan with its current wording as it considers it to be unsound due to the fact that currently it does not fully comply with the NPPF.

Change To Plan:

Full Reference: C - 6210 - 8431 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

765

6223 Comment**Respondent: The Theatres Trust (Tom Clarke) [216]****Agent: N/A**

Summary: The Theatres Trust supports proposed Policy L2. It reflects clear guidance in para. 70 of the NPPF regarding the promotion and protection of community and cultural facilities.

Change To Plan:

Full Reference: C - 6223 - 216 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6228 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Policy L2: Public Rights of Way and other green infrastructure should also be considered within this policy, together with an aspiration to enhance and increase the existing provision where possible.

Change To Plan:

Full Reference: C - 6228 - 7887 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6257 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: There are a lot of open spaces and fields interposed in between groups of properties or buildings, which help retain the open space character as per original plans by Sir Gibberd. However at the same time there are not provisions in place to protect these individual areas and fields from future further housing development.

Change To Plan:

Full Reference: C - 6257 - 8436 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6258 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: More bus routes, more frequent runs and higher number of buses for each route are needed in this town to reduce a progressive increase in number of cars clogging our roads. But at the same time, bus fares need to be reduced, as at current levels they are unaffordable and unjustified.

Change To Plan:

Full Reference: C - 6258 - 8436 - L2 Justification - None

6237 Comment

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: L3 Development Involving the Provision or Relocation or Loss of Public Art
The viability of this Policy will need to be assessed alongside the other policy requirements of the local plan to ensure development viability is not threatened.

Change To Plan:

Full Reference: C - 6237 - 8437 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6315 Comment

Respondent: Miller Homes [8449]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]

Summary: f HDC is minded to retain Policy L3 in its emerging Local Plan, it should prepare and present evidence to demonstrate where there are public art deficiencies in the Town, how those deficiencies should be addressed and the level of contribution / obligation likely to be necessary to do so. This will ensure that Policy L3 complies with the tests of soundness at paragraph 182 of the NPPF and will help inform HDC's forthcoming Delivery Study in respect of viability.

Change To Plan:

Full Reference: C - 6315 - 8449 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6341 Comment

Respondent: Home Group (Jessica Watts) [8445]

Agent: N/A

Summary: Home Group are in support of this policy, which sets Harlow apart as a cultural centre, supports the creative arts and gives added value to developments.

Change To Plan:

Full Reference: C - 6341 - 8445 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

766

6218 Comment Respondent: **The Roydon Society (Miss Nicola Wilkinson) [27]**

Agent: N/A

Summary: Additional traffic is a major concern for Roydon with those working in Harlow from the adjacent authority using the B181 as a rat run causing major congestion and pollution in the main village.

Change To Plan:

Full Reference: C - 6218 - 27 - Infrastructure - None

6229 Comment Respondent: **Essex Bridleways Association (Mrs Sue Dobson) [7887]**

Agent: N/A

Summary: Paragraph 6.1 refers to vehicle, pedestrian and cycle access, however all non-motorised users should be included within Harlow's policies. Whilst paragraph 6.3 refers to the maintenance and repair of public rights of way as a responsibility of the Local Highway Authority, this document omits any aim or aspiration to improve the rights of way network within Harlow and this should be amended. Harlow is poorly-served with bridleway access and the Plan should ensure that every opportunity is taken to improve the network and ensure that as much as possible is accessible to as many users as practicable.

Change To Plan:

Full Reference: C - 6229 - 7887 - Infrastructure - None

6240 Comment Respondent: **Highways England (Mr Mark Norman) [7939]**

Agent: N/A

Summary: We have been talking to the District for a long time about aspirations for growth, it is recognised that large parts of the district are not served well by public transport. Parts of the strategic road network (SRN) running through the districts are already close to capacity and cannot reasonably cope with large amounts of additional development without significant improvement and it recognised that Essex CC have proposals for a new junction on the M11 and this will provide some relief to both junctions 7 and 8. Until housing and employment is committed, schemes can really only deal with existing challenges allowing for a limited amount of growth as the designs are based on previously envisaged growth rates rather the much more ambitious level proposed in the fourth coming local plan. This means the need for careful planning to ensure proposed development is in the most appropriate place with the necessary facilities and infrastructure available at the right time and a steep change both in the provision and take up of public transport, if this level of development is to be sustainable.

We support the policies in the document aimed at reducing the need to travel by private car, such as improved walking, cycling and public transport infrastructure, and the provision of high speed broadband allowing people to more easily communicate and work remotely reducing the demand for travel.

Change To Plan:

Full Reference: C - 6240 - 7939 - Infrastructure - None

6263 Comment**Respondent: Elaine Allen [6031]****Agent: N/A**

Summary: (Note: This is a transcript of a scanned letter. See attachment for original letter.)

I have made several visits to the Old Harlow Library to read the above book. I found it a very bland book and difficult to relate all it said to our local area. I would like to point out some of the problems it failed to take into account.

I live in Churchgate Street and am very aware that we will be cut off from Old Harlow and the rest of the town. We are an older population than the rest of Harlow, a number of the people living there are widowed and living on their own, mostly women, many of them unable to drive often due to poor health. They/we will be cut off from the Old town's Doctors, the Library, and also the (food) shops.

The local bus only runs hourly if you are lucky, I have on several occasions picked up a friend who has been waiting for a bus home for over an hour (she is nearly 90) and now house bound. She is not an isolated case.

I have friends in Old Road, and Little Hailing bury plus several other local areas. To reach them I would have to travel to Mark Hall and return almost to where I had started. An absolute waste of fuel, time and unnecessary pollution to visit them as you are intending stopping us using our present routes.

In the morning rush hour there is gross queuing the get into Harlow from Heriford on the A414 and also on the A1184 from Bishop Stortford, north of Sawbridgeworth into Harlow. This is not a very attractive situation for the people you are hoping to recruit into the new research centres you are building/planning. Surely it would, long term, be more economic/sensible to build a road from the Highwych round-a-bout now rather than a second road to the motorway in 2030ish. Are you going the dual Fifth Avenue over the marsh/and, River Start and railway to alleviate the current traffic problems that exist there? A very expensive solution which would not be needed if the northerly route where built.

Change To Plan:

Full Reference: C - 6263 - 6031 - Infrastructure - None

6288 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: All proposed infrastructure schemes should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.

Change To Plan:

Full Reference: C - 6288 - 8441 - Infrastructure - None

6301 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: There is currently no policy focused on ensuring necessary sewage capacity is in place to support proposed developments. This is crucial in order for the impact of proposals on the waste water network to be appropriately considered, and in order to prevent development being approved which is then found to be unviable for this reason. It must also be stated that all new development should be connected to mains, unless this is proven unfeasible. Confirmation from the relevant water utility company should be required before granting permission to planning applications in order to ensure that there will be no detrimental impact as a result.

Change To Plan:

Full Reference: C - 6301 - 8443 - Infrastructure - None

6304 Comment**Respondent: EFA (Dr Douglas McNab) [8404]****Agent: N/A**

Summary: General Comments on the Local Plan Approach to New Schools

4. The draft Development Management Policies includes limited content relating to the provision of schools. However, this is to be expected as this issue is generally addressed in strategic policies and site allocations, which the ESFA understands will be included in the next round of Local Plan consultation early in 2018.
5. Essex County Council's recently published 10 year plan for meeting the demand for school places indicates that, based on existing plans for growth, there will be a need for 1078 additional primary school places and 1635 secondary school places over the next ten years. However, there are already plans in place to help to address this need, including a new 8FE secondary free school (Sir Frederick Gibberd College, Burnt Mill Academy Trust) and a new 2FE primary school (Essex Newhall school, Reach2 Academy Trust). The requirement for school places may increase once the latest housing target for Harlow is confirmed. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.
6. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156) , the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.
7. With regard to planning positively for new schools, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD) . The DPD provides policy direction and establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Harlow Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies.
8. A strategic infrastructure policy within the Local Plan could usefully highlight some wider infrastructure planning principles, including:
- A commitment to work with infrastructure providers to ensure the necessary infrastructure is provided to support development and meet need;
 - The need to coordinate development and infrastructure provision to ensure development is supported by the timely provision of adequate infrastructure;
 - A requirement for all development to safeguard the requirements of infrastructure providers, including education facilities.
9. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Harlow can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the district over the plan period.

Change To Plan:

Full Reference: C - 6304 - 8404 - Infrastructure - None

769

6306 Comment**Respondent: EFA (Dr Douglas McNab) [8404]****Agent: N/A**

Summary: Evidence Base

17. An up to date Infrastructure Delivery Plan that draws on the Harlow Infrastructure Study (2010) and provides clarity about what infrastructure will be required when and how it will be funded will clearly be an important evidence base document for the Local Plan. As part of the development of a complete draft of the Local Plan it would be useful if a background/topic paper could also be developed setting out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools at different times, expanding on the information in an Infrastructure Delivery Plan and site specific policies. This could also reference Essex County Council's recently published 10 year plan for meeting the demand for school places. This would help to demonstrate clearly that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the ESFA can assist in providing good practice examples of background documents relevant to this stage of your emerging Plan.

Conclusion

18. Finally, I hope the above comments are helpful in shaping Harlow's Local Plan, with specific regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text and/or evidence base arising from these comments.
19. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Harlow Council to aid in the preparation of the Local Plan.

Change To Plan:

Full Reference: C - 6306 - 8404 - Infrastructure - None

6328 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Places for People will be sponsoring the applications for the Central and Eastern Crossings, and will if necessary be providing the forward funding to ensure their delivery. However, the Crossings are required to meet existing demand and to accommodate the planned growth of Harlow and the wider area. The Infrastructure Chapter should include a policy that makes it clear that development that benefits from the Crossings and other strategic infrastructure should make appropriate contributions either by way of planning obligations or Community Infrastructure Levy payments.

Change To Plan:

Full Reference: C - 6328 - 7958 - Infrastructure - None

6330 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Para 6.1 - This should refer to "local transport infrastructure" rather than highway infrastructure;
* Para 6.3 - Consultation with Highways England should only take place where the proposals affect a Highways England road;
* Objective 13 - We suggest this is re-worded as follows: "Reduce the need to travel, in particular by single occupancy vehicles, by ensuring new development is located where it is, or can be, well served by sustainable modes of transport";
* Objective 14 - We suggest the insertion of the words "where necessary" after "Improve transport links";

Change To Plan:

Full Reference: C - 6330 - 7958 - Infrastructure - None

6374 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Consider removing the word 'walkways' and adding footways and referring to the public rights of way network including footpaths, bridleways and byways.

Change To Plan:

Full Reference: C - 6374 - 8452 - Infrastructure - None

6230 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: This Policy omits any reference to other users within any new developments, stating that consideration will be given to only pedestrians and cyclists. This Policy should be amended to ensure that multi-user routes are created, accessible to all non-motorised road users. As the Policy stands it is discriminatory against a significant user group and this should be rectified. It is interesting to note that in another Local Plan in Essex which had little mention of equestrian access, at the public inquiry, the Inspector specifically requested the Plan was changed to incorporate equestrian access within it.

Change To Plan:

Full Reference: C - 6230 - 7887 - IN1 Development and Sustainable Modes of Travel - None

6238 Comment **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: IN1 Development and Sustainable Modes of Travel
Policy IN1 requires charging points for vehicles and infrastructure for the future operation and maintenance of the facility.
In considering development plan policies, Para 173 of the NPPF stresses the importance of ensuring viability, including having regard to the costs of any requirements likely to be applied to development. According to the Energy Savings Trust the typical cost for a home charge point and installation is approximately £1,400. It is unclear whether such an assessment has been undertaken in relation to the proposed policy and its impact upon development viability.
Notwithstanding the above, the NPPF contains a clear requirement that such facilities should only be required 'where practical'. It is considered that the practicality of delivery should be a factor when it comes to incorporating charging plug-in. For instance, it may not be practical to make provision where parking is provided off-plot (such as in a parking court or within a communal area).
It is also considered that the policy should consider the practicality of delivery. There are a range of different technologies for charging. It would be more practicable if the requirement related to on-plot parking adjacent to the property it serves.
Furthermore, that the requirement relates to the ability to make a connection (i.e. the development delivers a suitably sited separate electrical spur) which would allow for a charging unit for an electric vehicle to be installed by the householder (should they choose to do so).

Change To Plan:

Full Reference: C - 6238 - 8437 - IN1 Development and Sustainable Modes of Travel - None

6296 Comment **Respondent: Dr Roger Bamford [8442]** **Agent: N/A**

Summary: Fingers crossed Harlow, unlike other councils, will accept the need for future road improvements and accept that not everyone will be able or willing to travel by bicycle or public transport (unless there are major improvements to these more sustainable methods!).

Change To Plan:

Full Reference: C - 6296 - 8442 - IN1 Development and Sustainable Modes of Travel - None

6331 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: * Policy IN1 - We suggest that "where appropriate" should be inserted at the beginning of clause (a). We suggest that clause 2 is amended to include the option of passive provision as well as active provision. In addition, the text following the policy (e.g. 6.10) refers to sustainable modes i.e. bus and rail but the policy wording only refers to walking and cycling. Therefore, the policy wording should be expanded to include these other modes;
 * Para 6.13 - As noted above, the aim is to reduce single occupancy car journeys since car sharing can, in the right circumstances, be beneficial and sustainable. The reference to car sharing should apply to all forms of development, not just residential;

Change To Plan:

Full Reference: C - 6331 - 7958 - IN1 Development and Sustainable Modes of Travel - None

6375 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: There are no references within the DM document to the Harlow and Gilston Garden Town, nor any of its key elements, i.e. the sustainable travel corridors connecting the strategic sites
 a. Consider adding 'footways' so it reads footways/cycleways, footpaths can remain but generally is used in the context 'public' footpath, i.e. a public right of way.
 b. Consider adding 'footways' so it reads footways/cycleways and changing 'footpaths' to public rights of way serving the development.
 c. Consider adding 'footway' so it reads footway/cycleway and public rights of way network.

Generally there is no reference here to public transport/buses and it is considered essential that there should be. It should include references to the following:

* Residential development being well located within 400m of a bus stop

* New development providing new bus stop infrastructure or upgrading existing infrastructure to include, signage, shelters, timetables or real time passenger information

* New development to provide new/enhanced bus services.

Policy IN1 refers to modal hierarchy as set out in the Strategic Policies although these are not yet available to review. There is no reference to public transport (rail or bus) in the policy (although it is mentioned in the supporting text). This policy and the accompanying text does not appear to give sufficient weight to the need to deliver a step-change in travel behaviour in the district (and beyond). Greater emphasis could be given to Travel Plans in this document, and their long term role in monitoring and delivering modal switch. For example, Travel Plan co-ordination across smaller sites and/or Travel Plan Co-ordinators, and their requirement for the larger strategic sites are worth considering. Use of planning obligations to employ a Travel Plan co-ordinator is suggested, particularly for the larger sites, but may be appropriate for a wider Harlow and Gilston Garden Town Travel Plan Co-ordinator to deliver the wider area initiatives which could include smaller sites/existing development
 This policy / group of Development Management policies could include reference to the need to support the Harlow and Gilston Garden Town and any of its future initiatives which would actively encourage sustainable travel/reduce the need to travel, and any associated infrastructure

Change To Plan:

Full Reference: C - 6375 - 8452 - IN1 Development and Sustainable Modes of Travel - None

CHAPTER: INFRASTRUCTURE**IN1 Implementation****6376 Comment****Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Consider including reference to the Essex Rights of Way Improvement Plan and Essex Development and Public Rights of Way advice note.

There is mention in 6.14 that employment developments should 'investigate' the potential for shuttle buses. There is also mention of a potential need for Transport Assessments or Transport Statements to be prepared. Neither of these explicitly state that developers will be expected to provide suitable levels of bus service, where these do not already exist. A good example is the planned future increase of healthcare jobs to the (broadly) Pinnacles area - these collective organisations could end up with shifts starting and finishing at all times throughout the day, making it a 24/7 operation - 'shuttle buses' would not be sufficient to cater for this need.

Change To Plan:

Full Reference: C - 6376 - 8452 - IN1 Implementation - None

6231 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
 Summary: Policy IN2: Point (b) again only caters for pedestrians, cyclists and powered two-wheelers and omits equestrians. This should be rectified as per our comments on Policy IN1 above.

Change To Plan:

Full Reference: C - 6231 - 7887 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6317 Comment **Respondent: Miller Homes [8449]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: Policy IN2 confirms that development will be supported where it meets a number of highway network related criteria, including that it should not cause a "significant" detrimental impact on road congestion and movement.

However, the corresponding test at paragraph 32 of the NPPF states that development should only be refused on transport grounds where the residual cumulative impacts of development are "severe".

Therefore to be consistent with national policy, Policy IN2(a) should be amended to read "it would not cause a severe detrimental impact on road congestion and movement".

Change To Plan:

Full Reference: C - 6317 - 8449 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6332 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: * Policy IN2 - In relation to clauses (a) and (b), we consider that the wording of this policy should be amended to make it consistent with NPPF and in particular paragraph 32 i.e. development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe;
 * Para 6.20 - We consider this should refer to the tests set out in NPPF; and
 * Para 6.21 - We suggest this is amended so that the scope of the studies is agreed prior to submission rather than the studies themselves. The reference to Highways Agency should be Highways England.

Change To Plan:

Full Reference: C - 6332 - 7958 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6377 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: b. ECC suggests consideration of whether powered two wheelers require a specific reference given that they are road users.

Change To Plan:

Full Reference: C - 6377 - 8452 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6387 Comment **Respondent: Roydon Parish Council (Janet Ballard) [5434]** **Agent: N/A**

Summary: Impact of development on the Highways Network - It is important that development does not impact negatively on communities bordering Harlow such as Roydon. Congestion here is already severe and more traffic generated from new development should not make the current situation even more difficult.

Change To Plan:

Full Reference: C - 6387 - 5434 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6200 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: Sadly, traffic flow is not being managed well by Ringway Jacobs & others whose responsibility it is. They seem unable to come up with significant improvements. EG the Burnt Mill roundabout improvement is only marginally successful, at peak times, it is still a nightmare & impacts all the way back to Third Avenue. Also the roundabout at Sainsburys is a mess along with unclear footways which create a hazard to pedestrians near their petrol station & near the Fire Station. I am sure there are many other instances around The Town as well. Clearly, 'implementing' has gone wrong here.

Change To Plan:

Full Reference: C - 6200 - 8418 - IN2 Implementation - None

6378 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This sets out the Local Plan strategic objectives - consideration is suggested as to whether these should include ref to Harlow and Gilston Garden Town, and its aims. "Objective 13 - reduce the need to travel by vehicle by ensuring new development is sustainably located; Objective 14 - Improve transport links for all modes of transport, to community facilities" (my italics) - consideration is suggested as to whether this address the need for/emphasis on sustainable travel as a priority. It cannot be assumed that just because a development is located sustainably, that it would be accessed sustainably.

It is recommended that this paragraph is rewritten to avoid use of the expression 'negative'.
Reference should be added at the end of the paragraph to 'Essex County Council Development Management Policies'

'Highways Agency' should now read 'Highways England'.

Change To Plan:

Full Reference: C - 6378 - 8452 - IN2 Implementation - None

6259 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: The Council needs to create more parking spaces for the already existing residential areas where, it is true, the reality is that often enough each household has an average of 2 vehicles per household or property. Housing have already started creating open free parking areas where they have demolished garage block not to replace them. The Council should create more of these free parking areas, where there are buildings that have been left empty for many years (both of Harlow Council or Essex County Council ownership).

Change To Plan:

Full Reference: C - 6259 - 8436 - IN3 Parking Standards - None

6388 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: Parking - Whilst Harlow Council may wish to promote alternative transport methods, the reliance on the car must not be underestimated and parking provided accordingly. New Hall already has parking problems, which require a resolution from a private parking company, so this needs to be addressed.

Change To Plan:

Full Reference: C - 6388 - 5434 - IN3 Parking Standards - None

6342 Comment**Respondent: Home Group (Jessica Watts) [8445]****Agent: N/A**

Summary: Home Group understands the need to acknowledge and provide for the local demand for parking, but are in support of reducing this where appropriate to help achieve sustainability aspirations and unlock constrained sites. This is particularly important on sites with limited footprints but with good links to transportation where the use of other methods of travel can be encouraged in order to create viable and vibrant schemes.

Change To Plan:

Full Reference: C - 6342 - 8445 - IN3 Implementation - None

6289 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy IN4: Broadband and Development
It is recommended that part (a) is amended to refer to both the natural and built environment rather than simply "environment".

Change To Plan:

Full Reference: C - 6289 - 8441 - IN4 Broadband and Development - None

6379 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Add the word 'Superfast' to this paragraph. This would accordingly read:
'Superfast Essex' does not cover new build properties and therefore Harlow DC 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.

Change To Plan:

Full Reference: C - 6379 - 8452 - IN4 Justification - None

6290 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy IN5: Telecommunications Equipment
We would request that this policy is amended have regard to the wider townscape and historic environment. The siting and location of telecommunications equipment can affect the appearance of the public realm and wider streetscene, the consideration of their positioning is therefore important, particularly in conservation areas.

Change To Plan:

Full Reference: C - 6290 - 8441 - IN5 Telecommunications Equipment - None

6305 Comment**Respondent: EFA (Dr Douglas McNab) [8404]****Agent: N/A**

Summary: Developer contributions

10. The key policy included in the document relating to planning for schools is policy IN6 Planning obligations. The establishment of the central principle that "Planning permission will only be granted for development if the provision is secured for related infrastructure, affordable housing, services, facilities...which are necessary to make the development acceptable in planning terms..." is supported. The ESFA requests that this policy explicitly refers to schools here as a key type of infrastructure that tends to be secured via s106, especially where new schools are required to support housing growth.

11. The explanation of onsite and offsite contributions is also useful: "Where it can be demonstrated that provision on site is not feasible then provision elsewhere, or a contribution towards this provision, will be required."

12. The ESFA is aware that Essex County Council has a model infrastructure policy that they are encouraging all Essex local planning authorities to adopt. Harlow Council should have regard to this in developing the next version of policy IN6.

13. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note that Essex County Council has produced a Developers' Guide to Infrastructure Contributions (revised 2016) that includes an explanation of contributions towards expanding existing schools and creating new schools. It would be helpful and relevant for this document to be referenced within the Local Plan in the section alongside policy IN6.

14. The explicit recognition of education facilities alongside other types of infrastructure and services that development can create a need for is welcomed (para 6.3).

15. Paragraph 6.4 states that "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". The ESFA notes that further guidance will be set out in a Planning Obligations Supplementary Planning Document. The ESFA request that this document clearly sets out how contributions towards expanding existing schools and developing new schools will be calculated, using an evidence based child yield figure for new developments and up to date information on costs (with clearly identified evidence sources).

16. The ESFA would be interested in responding to any draft Planning Obligations SPD, review of infrastructure requirements or proposed CIL. As such, please add the ESFA to the database for future CIL/infrastructure consultations.

Change To Plan:

Full Reference: C - 6305 - 8404 - IN6 Planning Obligations - None

6380 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC supports the inclusion of policies covering strategic infrastructure, and developer contributions and Community Infrastructure Levy. ECC suggests replacing this policy, which is currently relatively light on content and detail with ECC's standard best practice wording
A revised policy should consider covering the following:
* Specify when developers are required to either make direct provision or to contribute towards development for the provision of local and strategic infrastructure required by the development (including land for new schools);
* Requirements for all new development to be supported by, and have good access to all necessary infrastructure;
* Requirement to demonstrate that there is or will be sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed implications of a scheme (i.e. not just those on the site or its immediate vicinity) and regardless of whether the proposal is a local plan allocation or a windfall site;
* When conditions or planning obligations will be appropriate - as part of a package or combination of infrastructure delivery measures - likely to be required to ensure new developments meets this principle; and
* Consideration of likely timing of infrastructure provision - phased spatially or to ensure provision of infrastructure in a timely manner.

Recommended wording for such an 'Infrastructure delivery and impact mitigation' policy is provided within the ECC Exemplar Infrastructure delivery and impact mitigation Policy as below:

"Policy IN6:Planning Obligations, Infrastructure delivery and impact mitigation

Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.

Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Council and the appropriate infrastructure provider. Such measures may include (not exclusively):

- * financial contributions towards new or expanded facilities and the maintenance thereof;
- * on-site construction of new provision;
- * off-site capacity improvement works; and/or
- * the provision of land.

Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.

The Council will consider introducing a Community Infrastructure Levy (CIL) and will implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL.

For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this plan.

Exceptions to this policy will only be considered whereby:

- * it is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm;
- * a fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and land owner receipt necessary for the development to proceed;
- * full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and
- * obligations are entered into by the developer that provide for appropriate additional mitigation in the event that viability improves prior to completion of the development."

Please note that the following glossary to support this policy could be included within the Draft Plan at Appendix 1 - Acronyms and Glossary.

"Glossary

Infrastructure means any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively):

- a. footways, cycleways and highways
- b. public transport

- c. drainage and flood protection
- d. waste recycling facilities
- e. education and childcare
- f. healthcare
- g. sports, leisure and recreation facilities
- h. community and social facilities
- i. cultural facilities, including public art
- j. emergency services
- k. green infrastructure
- l. open space
- m. affordable housing
- n. live/work units and lifetime homes
- o. broadband
- p. facilities for specific sections of the community such as youth or the elderly"

Change To Plan:

Full Reference: C - 6380 - 8452 - IN6 Planning Obligations - None

Respondent List for Local Development Plan Pre-Submission Publication

B.K. & J.T. Drabble [8611]
 Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]
 BOC (Glen Jenkins) [8571]
 Canal & River Trust (Ms Tessa Craig) [8612]
 Chelmsford City Council (Ms Jenny Robinson) [8636]
 De Merke Estates (Ms Emma Gladwin) [8643] represented by Barton Willmore (Miss Emma Gladwin) [8399]
 Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]
 East Herts District Council (Mr George Pavey) [8616]
 Environment Agency (Miss Lisa Mills) [8443]
 Epping Forest District Council (Ms Alison Blom-Cooper) [8637]
 Essex Bridleways Association (Mrs Sue Dobson) [7887]
 Essex County Council (Mr Rich Cooke) [8452]
 Forestry Commission (England) (Ms Corinne Meakins) [8617]
 Gillian Atkins [8577]
 GLADMAN (Mr Phill Bamford) [8618]
 Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]
 Harlow Alliance Party (Mr Nicholas Taylor) [8621]
 Harlow Civic Society (Mr John Curry) [5318]
 Hertfordshire County Council (Mr Martin Wells) [8622]
 Highways England (Mr Mark Norman) [7939]
 Historic England (Ms Debbie Mack) [8623]
 Home Builders Federation (Mr Mark Behrendt) [8450]
 Indigo Planning Limited (Mr Diogo Duraes) [8632]
 Jean Wright [5878]
 Lawson Planning Partnership (Miss Kathryn Oelman) [8532]
 Little Hadham Parish Council (Mr Neil Wardrop) [8624]
 Miller Strategic Land [5769] represented by Andrew Martin - Planning (Mr Olivier Spencer) [5533]
 Miss Aimee Turvill [8607]
 Miss Erin Rose BALDRY [8560]
 Miss Mary Wiltshire [6026]
 Morley Grove Residents Association (Sheila Sullivan) [5043]
 Mr David Naylor [8579]
 Mr Danny McCaughey [8578]
 Mr David Beavis [8615]
 Mr Dean Burns [8552]
 Mr Ethan Baldry [8559]
 Mr James Humphreys [8561]
 Mr John Graham [8542]
 Mr MASOUD ESKANDARIAN [8625]
 Mr Mike Stokes [8551]
 Mr Nigel Bangert [8638]
 Mr Ray Goodey [8580]
 Mr Ricky Goldblatt [8631]
 Mrs Karen Garrod [8596]
 Mrs Samantha Baldry [8554]
 Mrs Sarah Gibbins [8582]
 Ms Angela Parish [8550]
 Ms Christina Webb [8613]
 Ms Jennifer Bedford [8557]
 Ms Nikki Kellman [8629]
 National Federation of Gypsy Liaison Groups (A. Yarwood) [8627]

Respondent List for Local Development Plan Pre-Submission Publication

Natural England (Ms Sarah Fraser) [8628]
NHS West Essex CCG (Mrs Jolene Truman) [8584]
Persimmon Homes (Mr David Moseley) [8437]
Quod Planning (Mr Philip Murphy) [7958]
Redrow Homes (Ms Kate Holland) [8640] represented by Redrow Homes (Ms Kate Holland) [8640]
Roydon Parish Council (Janet Ballard) [5434]
Sandra Beavis [5035]
STOP Harlow North [8588] represented by Mr Jed Griffiths [8576]
Tetlow King Planning (MEGHAN ROSSITER) [8630]
Thames Water (Savills) (Mr Chris Colloff) [8433]
The Roydon Society (S.N. Wilkinson) [8634]
The Theatres Trust (Tom Clarke) [216]
Weston Homes Plc (Mr David Poole) [8590]

May 2018

Pre-Submission Publication

24th May 2018 to 6th July 2018

Local Development Plan and Policies Map

Available to view at:

- Civic Centre
- Latton Bush Centre
- Harlow libraries

All the documents including supporting technical studies are available to view at: www.harlow.gov.uk/local-plan-publication



78@HarlowCouncil



Reference:

Date:

Representation Form

Please note that it is not possible for representations to be considered anonymously. You must include your name and address on any comment in order for it to be accepted and complete the data consent form.

For more information on how Harlow Council collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice> or write to Data Protection Officer, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG.

Personal Details

Please tick as appropriate:

Responding as an individual

Responding on behalf of an organisation

Agent responding on behalf of client

Please complete in block capitals

Agent Details (if applicable)

First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Tittle/Dept	<input type="text"/>
Organisation	<input type="text"/>
Email	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Postcode	<input type="text"/>
Tel.No	<input type="text"/>
Mobile	<input type="text"/>

First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Tittle/Dept	<input type="text"/>
Organisation	<input type="text"/>
Email	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Postcode	<input type="text"/>
Tel.No	<input type="text"/>
Mobile	<input type="text"/>

HARLOW COUNCIL – FORWARD PLANNING PRIVACY

This is an editable form – please return by email to myharlow@harlow.gov.uk once complete.

In accordance with the General Data Protection Regulation, please complete below:

- **Section 1** if you are making comments (a representation) on the Local Plan
- **Section 2** if you want to receive Planning Policy updates (even if you already receive them)
- **Section 3** to provide your details

1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

If you do not provide consent, we cannot process your comments and you may not be able to participate in the Local Plan examination.

Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data* on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so your comments on the Local Plan can be processed.

**Your name and comments will be made public, but any address, telephone and email details will remain confidential.*

2. RECEIVING UPDATES

Even if you already receive updates, you must provide consent to continue receiving them.

Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so Harlow Council can contact you using the details you provide to send you updates on the Local Plan and other Planning Policy matters.

3. YOUR DETAILS

Please confirm below your name and email **or** postal address. If you consent to receive updates, you will receive them via email or post depending on whether you supply your email or postal address. You are not obliged to provide your details; however we will be unable to process your any comments you make, or send you updates if you want them.

Contact name

Email

or Postal Address

We will keep a record of your consent for two years, after which time we will contact you to see if you still wish to receive this information. If you no longer wish to receive the above service, you may opt out at any time by contacting data.protection@harlow.gov.uk A record of your decision to opt out will be kept for six months. For more information on how we collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice>

Representation

Do you consider the proposed Pre-Submission Harlow Local Development Plan to be:

- | | | |
|--|-----|----|
| ➤ Legally Compliant | Yes | No |
| ➤ Sound | Yes | No |
| ➤ Compliant with the Duty to Co-operate | Yes | No |

Please indicate which part of the Local Development this comment relates to

Page	<input type="text"/>	<input type="text"/>	<input type="text"/>
Paragraph	<input type="text"/>	<input type="text"/>	<input type="text"/>
Policy	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comment

e.g. whether you feel the Pre-Submission Local Development Plan is legally compliant, compliant with the duty to co-operate and sound.

Suggestion of the modification(s)

e.g. If anything you consider necessary to change in order to make the Local Development Plan legally compliant or sound.

A large, empty rounded rectangular box with a black border, intended for writing suggestions for modifications to the Local Development Plan.

Examination

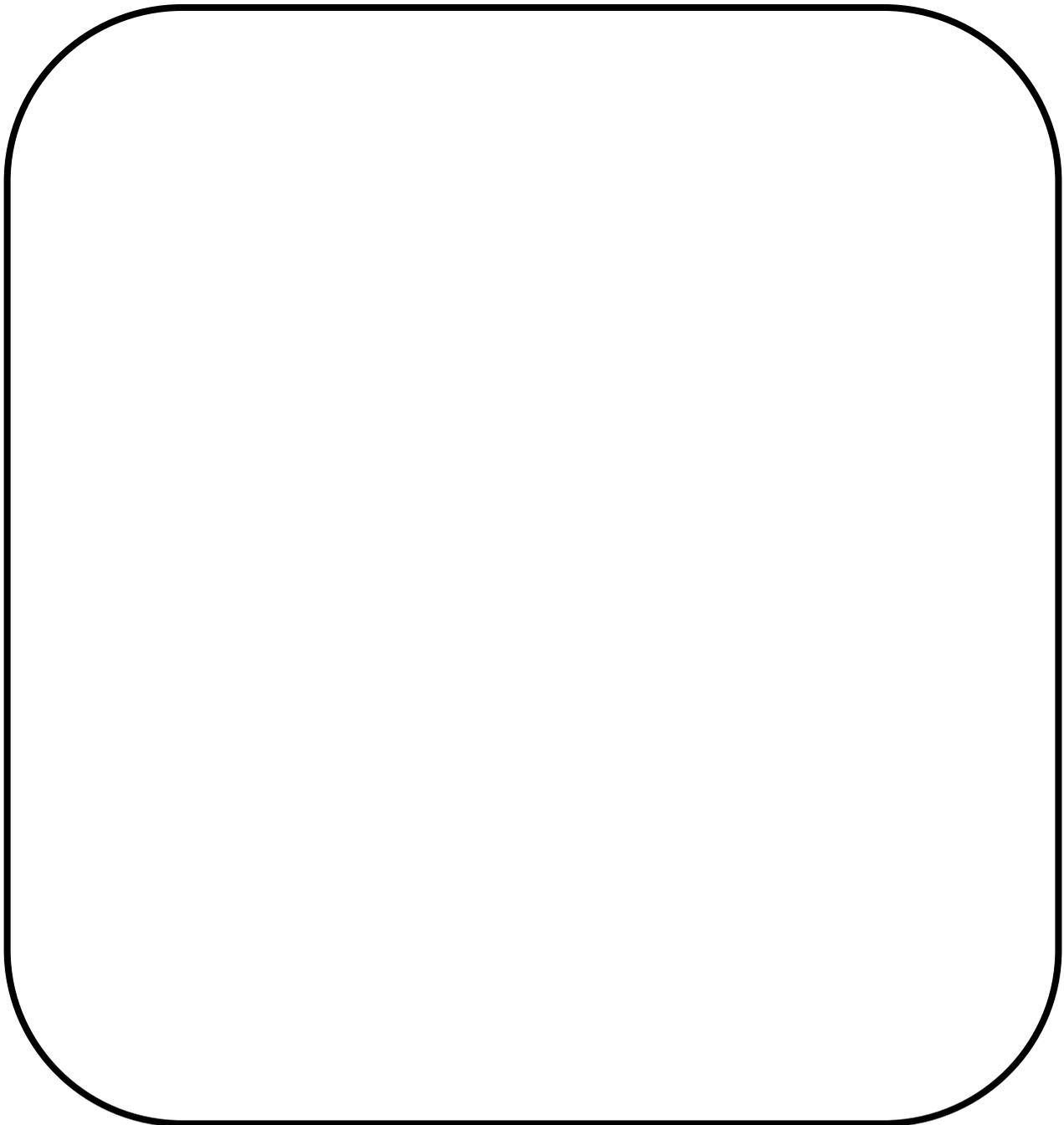
Please note that written and oral comments are equally weighted and will be given equal consideration by the inspector.

Please indicate your preference to participate at the oral examination

Yes, I Think it is necessary to participate at the oral examination

No. I do not wish to participate at the oral examination

If you consider it necessary to speak at the examination, please outline below why you consider it to be necessary. Please note that the Inspector will determine the most appropriate process to adopt to hear those who have indicated that they wish to participate at the examination.

A large, empty rounded rectangular box with a thick black border, intended for the respondent to provide reasons for their preference to participate in the oral examination.

Do you wish to be notified of any of the following?

The submission of the Harlow Local Development Plan for examination	Yes	No
The publication of the Inspectors Report on the Harlow Local Development Plan	Yes	No
The adoption of the Harlow Local Development Plan	Yes	No

Please return form to the Forward Planning Team:

By Email: myharlow@harlow.gov.uk

By Post **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG**

or

Go to the Harlow Council website at www.harlow.gov.uk/local-plan , and follow the link to view and comment on the document online

Please note that it is not possible for representations to be considered anonymously. You must include your name and address on any comment in order for it to be accepted and complete the data consent form.

Comment must be submitted no later than 4pm on Friday 6th July, 2018
(Comments received after this time may not be considered.)

This information is available in Accessible communication formats upon request

Signature

Date

Property

Private: 03448 475026

Accommodation To Let

PITTMANS FIELD HARLOW
Single Room in Town House, 2 Bathrooms
Communal areas cleaned Saturdays
Wi fi
No DSS
£100 inc bills pw
EPC Rating: N/A
Tel: 07838791688

Property To Let

DOUBLE ROOM HARLOW Fully furnished, clean, tidy, non-smokers. 400pcm bills/cleaning included EPC Rating: Awaiting Tel: 07980 383072

SAWBRIDGEWORTH

Purpose built, immaculately maintained, 2 bed flat in town center (Bell Street), 10 mins walk from station (40 mins Liverpool Street), 5 mins walk to buses, 25 mins to Stansted Airport. Call anytime.

£850 pcm

EPC Rating: Awaiting

01279 723308

Room to let

Exceptionally large double room. For single person. All bills inclusive / wifi. NO DSS. Just redecorated. Nice quiet house. Over 255 only. £110 per week. Harlow.

07580 251590

ROOM TO RENT IN STANSTED USE of all facilities. £90 pw EPC Rating: N/A Tel: 01279 813571

Park & Caravan Homes

MOBILE HOME TO RENT

Fully furnished, very clean. Available straight away. No children/pets

EPC Rating: Awaiting

01279 813344 or 07437 467641

TO LET UNIT STAPLE TYE

Unit to let in Staple Tye shopping mews, Harlow. 2 storey units, total 563 sq ft. Various uses considered. For further details or to view please call numbers below.

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Tel: 07918 603898 or 07812 340336

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Public Notices

24/7 Advertising for private and trade

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SEEKING TO LOCATE

Whiskers LLP are urgently trying to track down a retired police officer by the name of Harry Knight in relation to one of our current clients. Would you please contact us urgently on this number: 01279 439439 quoting AC.

Andrew Clowser - Whiskers LLP

Public Notices

JOHN ALLBUTT (Deceased)

Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the aforementioned deceased, late of 44 Copshall Close Harlow Essex CM18 7LJ, who died on 11/02/2018, are required to send particulars thereof in writing to the undersigned Solicitors on or before 27/07/2018, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice. WHISKERS LLP
6 Mire Buildings Kitson Way Harlow Essex CM20 1DR 7530390

WHY NOT? Self-serve

STATEMENT OF AVAILABILITY FOR INSPECTION UNDER THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (REGULATIONS 19)

The submission version of the Harlow Local Development Plan and other supporting documents will be available for public inspection during the Regulation 19 Publication period at the Harlow Civic Centre, Latton Bush Centre and Harlow libraries during normal opening hours.

Regulation 19 Publication period from **Thursday 24th May 2018 until Friday 6th July 2018**

All the documents including supporting technical studies are available to view on Harlow Council Website at: <http://www.harlow.gov.uk/local-plan>

For any further enquiries, please email myharlow@harlow.gov.uk or contact the Forward Planning team on 01279446897

This information is available in Accessible communication formats upon request



GOODS VEHICLE OPERATOR'S LICENCE

Courtlands Waste Management (UK) Ltd of North Place, Edinburgh Way, Harlow Essex CM20 2SL is applying to change an existing licence as follows:
To keep an extra 5 goods vehicles at North Place, Edinburgh Way, Harlow Essex CM20 2SL.

Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hill Crest House, 386 Harehills Lane, Leeds, LS9 6NF stating their reasons, within 21 days of this notice. Representors must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A guide to making representations is available from the Traffic Commissioner's Office.

Self-serve and save time

GOODS VEHICLE OPERATOR'S LICENCE

Gary Bone trading as Rightway Scaffolding Ltd of 8 Longwood Court, Upminster, Essex, RM14 2BX is applying for a licence to use Foster Street Farm, Foster Street, Harlow Common, Essex, CM17 9HS as an operating centre for 2 goods vehicles and 0 trailers

Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hill Crest House, 386 Harehills Lane, Leeds, LS9 6NF stating their reasons, within 21 days of this notice. Representors must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A guide to making representations is available from the Traffic Commissioner's Office.

Public Notices

STATEMENT OF REPRESENTATIONS PROCEDURE AND ARRANGEMENTS FOR INSPECTION OF THE HARLOW LOCAL DEVELOPMENT PLAN

(Proposed Submission "Publication Draft" Version)

Notice is hereby given, in accordance with regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, that Harlow Council is publishing the Harlow Local Development Plan. This notice gives details for inspection and public involvement.

Harlow Local Development Plan Pre-Submission Publication May 2018

Subject matter and area covered by the Local Development Plan
Harlow Council has prepared the Pre-Submission Publication version of the Harlow Local Development Plan together with a Policies Map which it proposes to submit to the Secretary of State for Housing, Communities and Local Government. The Harlow Local Development Plan provides a spatial planning framework to shape and guide development in the town until 2033. The plan sets out a spatial vision together with a number of strategic objectives that are supported by a suite of strategic and development management policies. The accompanying Policies Map identifies sites for housing employment and other forms of development, as well as those areas which are subject to a range of policy and environmental constraints. A separate Area Action Plan is, however, being prepared for Harlow Town Centre. The inset on the Policies Map indicates the area covered by separate Area Action Plan.

Representations

The period for submission of representations to the Council will run for six weeks from **Thursday 24th May 2018 until 16:00 on Friday 6th July 2018.**

There are various ways that you can send the Council your representation:

- Go to the Harlow Council website at www.harlow.gov.uk/local-plan, and follow the link to view and comment on the document online; or
 - Complete the representation form and post it to **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG** or email to the myharlow@harlow.gov.uk. Copies of the representation form can be found on the website at www.harlow.gov.uk/local-plan-publication, and hard copies in the Civic Centre reception upon request; or
 - Send an email or letter to the Council with the data consent form.
- For any further enquiries, please email myharlow@harlow.gov.uk or contact the Forward Planning team on 01279446897

Harlow Council 24th May 2018

This information is available in Accessible communication formats upon request



Public Notices

TOWN AND COUNTRY PLANNING ACT 1990 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 Planning (Listed Buildings and Conservation Areas) Regulations 1990 Town and Country Planning (Development Plans and Consultation) Directions 1992

PUBLIC NOTICE OF APPLICATIONS

The following applications have been received by Harlow District Council. These applications and others received can be inspected online at www.harlow.gov.uk or at Harlow Council Planning Services, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG on Monday-Friday, 9am-4.45pm. If you are unable to view the plans during these times, please telephone Planning Services on 01279 446856 where a suitable appointment can be made with the relevant case officer.

Anyone who wishes to make representations about these applications should write to the Council at the above address within 21 days of the date of this notice.

Application No	Application Type	Location	Ward
HW/FUL/18/00205	Full Application	Proposed Residential Development, 62 Glebelands, Harlow, Essex	Mark Hall
Proposal		Detached new residential build in land to rear of no. 62 Glebelands.	
Reason for Advert		Conservation Area	
Application No	HW/HSE/18/00198	Householder Application	Old Harlow
Application Type	Round House, Bunting Street, Newhall, Harlow		
Location	Demolition of existing garage, greenhouse and coal store, and construction of new cart lodge garage with office over.		
Proposal			
Reason for Advert	Listed Building		
Application No	HW/LBC/18/00199	Listed Building Consent	Old Harlow
Application Type	Round House, Bunting Street, Newhall, Harlow		
Location	Demolition of existing garage, greenhouse and coal store, and construction of new cart lodge garage with office over.		
Proposal			
Reason for Advert	Listed Building		
Application No	HW/HSE/18/00226	Full Application	Old Harlow
Application Type	Former NatWest Bank, Station Road, Harlow, Essex		
Location	First-floor extension over restaurant to form one residential flat unit.		
Proposal			
Reason for Advert	Conservation Area		
Application No	HW/HSE/18/00219	Householder Application	Old Harlow
Application Type	25 Fore Street, Harlow, Essex CM17 0AB		
Location	Demolish single-storey extension and conservatory, construct two-storey extension and single-storey lean-to.		
Proposal			
Reason for Advert	Listed Building in a Conservation Area		
Application No	HW/LBC/18/00220	Listed Building Consent	Old Harlow
Application Type	25 Fore Street, Harlow, Essex CM17 0AB		
Location	Removal of existing cement render from the external face of the west wall and replacement with lime render. Installation of two cast iron ventilation grills and insect mesh to the west wall and below the level of the floor.		
Proposal			
Reason for Advert	Listed Building in a Conservation Area		

Self-serve it INSTANTLY



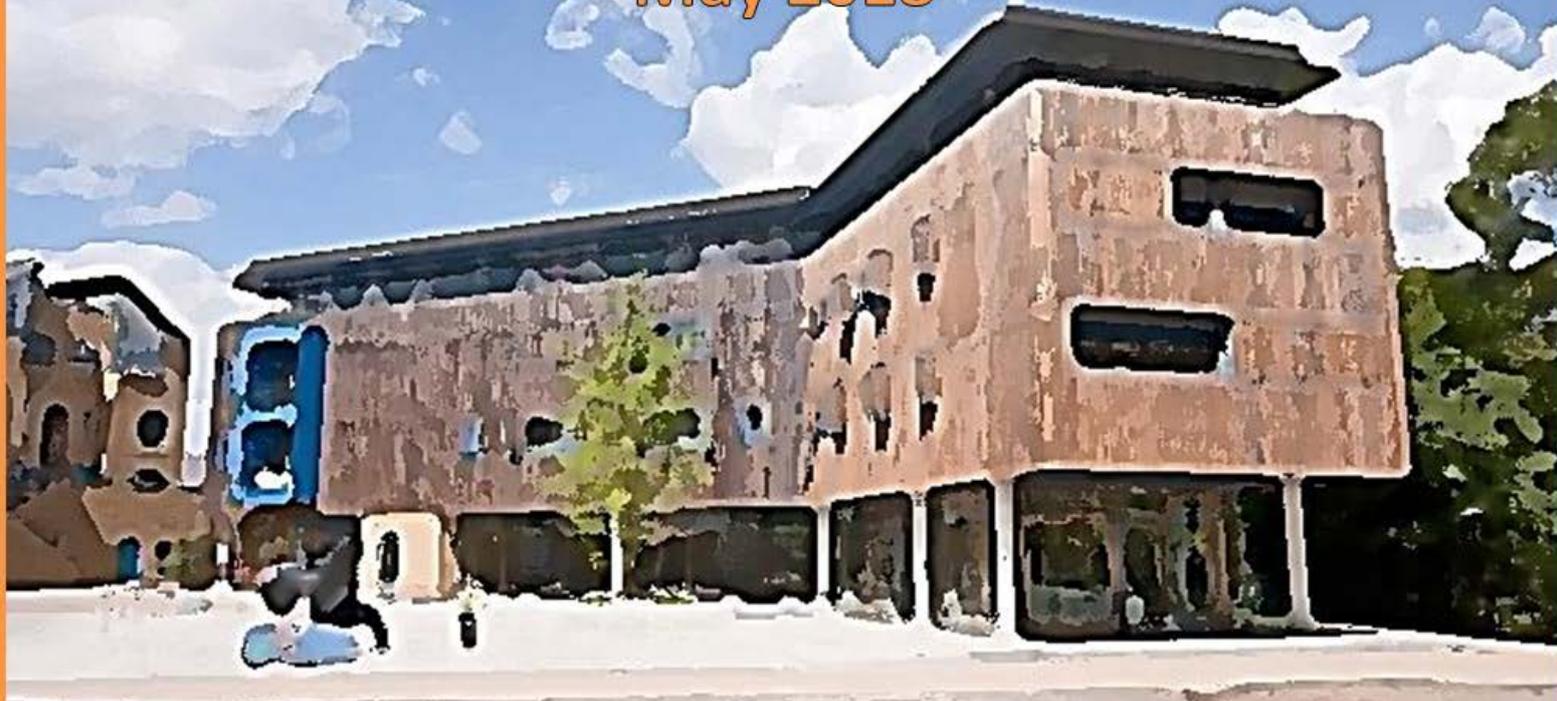
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Harlow Local Development Plan

May 2018



Pre-Submission Publication

24th May 2018 to 6th July 2018

Frequently Asked Questions



@HarlowCouncil



Harlow Local Development Plan Pre-Submission Publication May 2018

Frequently Asked Questions

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1. What does the Local Development Plan say?

The Local Development 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 that ensure future development is sustainable by meeting the needs of residents, businesses and visitors, while providing the required infrastructure and protecting environmental assets. Planning applications will be decided against the Local Plan policies.

The Policies Map, which maps the planning policies and proposals across Harlow, accompanies the Local Plan, along with other documents such as the Sustainability Appraisal and Infrastructure Delivery Plan. 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.



2. What is the Pre-Submission Publication?

The latest stage of the production of the new Harlow Local Plan is known as the Regulation 19 Pre-Submission Publication, which is the final public consultation stage before the Local Plan is submitted to the Planning Inspectorate for Examination.

3. How long is the Publication period?

The Pre-Submission Local Plan will be available for comments for a period of six-weeks from **Thursday 24th May to 4 pm on Friday 6th July 2018.**

Comments submitted after 4 pm on 6th July may not be considered.

4. Do I need to submit my comments if I have already done so previously?

Yes, because in order to comply with plan-making legislation, the Council cannot carry

forward previous comments into the Pre-Submission Publication.

5. What should I comment on?

At the Pre-Submission Publication stage, the Council is seeking views on whether the Local Plan is sound and meets the tests set out in the National Planning policy Framework (NPPF). In order for the Local Plan to be found sound at the Examination and be adopted by the Council, it has to meet a number of tests:

- The Plan must plan for the housing, employment and infrastructure needs;
- The Plan must be based on sound evidence;
- The development proposals identified within the Plan can be delivered by 2033; and

- The Plan is consistent with national policy, and enables sustainable development.

Comments will be passed to the Examination Inspector and it is recommended that comments should be clear, concise and targeted. In order to have the greatest influence at this stage it is advisable that comments should relate to the soundness of the Local Plan or its compliance with legal requirements.

Soundness

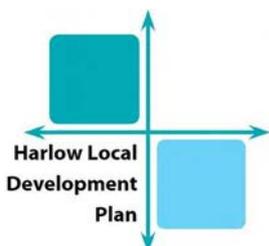
Plan-making regulations state that a local planning authority should submit a Local Plan for examination which it considers to be ‘sound’ – namely that it is:

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

It is advisable that comments made at this stage should therefore focus on whether the



Local Plan meets the tests listed above. This is because these are the broad areas that the Inspector will focus on in examining the Local Plan.

Legal Requirements

When considering if the Local Plan meets the legal requirements, the Inspector will consider a number of issues including:

- **Local Development Scheme** – has the Plan been prepared in accordance with the timetable set out in the Local Development Scheme?
- **Statement of Community Involvement and relevant regulations** – has consultation on the Plan been in accordance with the Council’s Statement of Community Involvement and have the appropriate bodies been consulted?
- **Duty to Co-operate** – has the Plan been prepared in co-operation with other local planning authorities and statutory

bodies, such as the Environment Agency and the Local Enterprise Partnership, to identify and address any issues?

- **Sustainability Appraisal** – has an adequate Sustainability Appraisal been carried out?
- **Habitats Regulation Appropriate Assessment** – has an adequate Appropriate Assessment under the Habitats Regulations been carried out?
- **National Policy and Legislation** – does the Plan comply with national policy and legislation, for example, the National Planning Policy Framework?

6. What is the best way to submit comments?

- Go to the Harlow Council website at www.harlow.gov.uk/local-plan, and follow the link to view and comment on

the document online; or

- Complete the representation form and send it to myharlow@harlow.gov.uk or post it to **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG**

7. Where can I find the representation form?

Copies of the representation form can be found on the website at www.harlow.gov.uk/local-plan-publication, and hard copies at the Civic Centre reception upon request.

8. Where can I find the Local Plan?

The Harlow Local Plan and supporting documents are available on the website at www.harlow.gov.uk/local-plan

The Policies Map and key evidence base documents are also available to view at the Harlow Civic Centre, Latton Bush



Centre, and Harlow libraries during normal opening hours.

9. How Harlow Council collect, use and protect my personal information?

For more information on how Harlow Council collect, use and protect personal information generally, please visit

www.harlow.gov.uk/privacy-notice or write to Data Protection Officer, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG

10. More Questions

If you have any other questions about the Local Development Plan, please contact a member of the Forward Planning Team on 01279446897 or email

Myharlow@harlow.gov.uk

Designed and produced by



Visit www.harlow.gov.uk/local-plan



@ HarlowCouncil



@ Harlow Council



This information is available in Accessible communication formats upon request

Consultation has started on town's 15-year development

Residents are given the opportunity to comment on new homes, shops, etc

By Charlotte Page

charlotte.page@harrow.gov.uk

HARLOW residents are invited to share their views on how the town will develop over the next 15 years in a series of consultations held over the next six weeks.

The consultation period has been branded as a "once-in-a-lifetime opportunity" as Harlow Council welcomes residents to have their say on the Local Development Plan. Now before it is submitted for final examination by the Government.

The aim of the plan is to create the perfect mix of homes, shops, education, health facilities and more in response to what will be the regeneration of the town until as late as 2033.

This is the last formal consultation on the plan before it is submitted to the Secretary of State for Housing, Communities and Local Government later this year for examination.

The five themes of the plan are: growing, housing, prospering, improving, and infrastructure.

WHAT DOES THE LOCAL DEVELOPMENT PLAN INCLUDE?

The plan will guide development in the town, including identifying where developments are both acceptable and unacceptable.

as well as providing a strategy to help grow and regenerate the town up to 2033.

It includes proposals to build on Harlow's Garden Town status. Public Health England's mission, Enterprise Zone developments and the new M11 junction 25.

The aim is to ensure the right infrastructure is in place at the right time to support new housing and business development opportunities. However, a key focus is to reconfigure a mix of farmland to be used for housing and creating community facilities and services that match Harlow's needs and ambitions for the future.

Previous consultations have highlighted a number of impact and issues which now form part of the plan. These include what new infrastructure is required, where and how much new housing there will be and how green spaces will be protected.

According to an assessment of housing need, the plan will allow a 3,200 houses within the Harlow boundary to be built up to 2033, with at least 30 per cent affordable housing.

Additionally, it sets out a strategy to assist in the provision of the Harlow and Olden Garden Community with East Hertfordshire and Haringey Power District Councils.

Once adopted, the Harlow Local Development Plan will replace the 2006 Harlow Local Plan.



See more about the plans and supporting documents, visit www.harrow.gov.uk. Documents are also available to

view during office hours at Harlow Civic Centre, Letchin Bus Centre and at Harlow Libraries. The consultation period begins

on Thursday, May 24, and will run through until Friday, July 6.

To submit your comments go

online or alternatively by post to:

The Forward Planning Team, Harlow Council, Wake Gardens, Harlow, Essex, CM20 1WQ, or email forward@harrow.gov.uk

County Hall urges people to get behind Option D for new, improved A120 to secure Government funding

ESSEX County Council has urged people to "vote behind a shared vision" after announcing their favoured route for a new and improved A120.

Local Roads Councillor Kevin Bevis, deputy leader at Essex County Council and cabinet member for infrastructure, announced option D as the council's preferred option for a new dual carriageway between Braintree and the A12.

The decision comes following a public consultation where 62 per cent of respondents agreed that this section of the A120 needed to be completely replaced to a dual carriageway in order to reduce congestion.

The proposed route would see Goddons Curve effectively aligned and it would link north a dual carriageway road joining the A12 at junction 23 south of Colchester.

"I truly believe that route option D offers the best solution to the problems of the current A120 between Braintree and the A12," said Cllr Bevis, of the Essex Roads Cllr Club.

"Our study work has demonstrated that the new £1 million scheme on Goddons Curve will see 22,750-60 in benefits. Route D also delivers 60 in returns in journey time savings."

The current single carriageway road is not fit for purpose and is often



The preferred route for the A120 from Braintree to the A12

heavily congested, causing major issues, but only for drivers and local means in Essex, but also those helping to fuel the UK economy through our country's international ports and airports.

"Now is when the real work begins. This scheme is competing with dozens of other projects for Government funding (£1 to £10). So everyone needs behind a shared vision for an improved A120."

"Please make your voice heard and make sure the Government know just how important this road improvement is to the future of Essex, East Anglia and the economic future of the country."

The work currently undertaken by the county council is only a preliminary stage and a preferred route announcement for the A120 can only be made by the Highways England in consultation with the Department for Transport.

The favoured route announcement will soon be presented to Highways England and the Department for Transport for funding within the Road Investment Strategy 2 - a funding period lasting between 2019 and 2025.

An announcement on whether the scheme has been successful is expected to be made in 2019. If it is to be funded, the newly upgraded A120 between Braintree and the A12 could open as early as 2023.

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- **Section 3** to provide your details

1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

If you do not provide consent, we cannot process your comments and you may not be able to participate in the Local Plan examination.

Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data* on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so your comments on the Local Plan can be processed.

**Your name and comments will be made public, but any address, telephone and email details will remain confidential.*

2. RECEIVING UPDATES

Even if you already receive updates, you must provide consent to continue receiving them.

Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so Harlow Council can contact you using the details you provide to send you updates on the Local Plan and other Planning Policy matters.

3. YOUR DETAILS

Please confirm below your name and email **or** postal address. If you consent to receive updates, you will receive them via email or post depending on whether you supply your email or postal address. You are not obliged to provide your details; however we will be unable to process your any comments you make, or send you updates if you want them.

Contact name

Email

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We will keep a record of your consent for two years, after which time we will contact you to see if you still wish to receive this information. If you no longer wish to receive the above service, you may opt out at any time by contacting data.protection@harlow.gov.uk A record of your decision to opt out will be kept for six months. For more information on how we collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice>

Local Development Plan Pre-Submission Publication

CHAPTER: BACKGROUND

BACKGROUND

6650 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: lack of consultation that has taken place with residents.

Back in the 1990's Harlow Council produced a document called "Consultation, Guide to good practice" which set out how it would engage with residents. A copy of this is attached to this submission. It is clear from what it has done in respect of the Local Plan has not adhered to its own commitment to consult. The way that residents have (or indeed have not) been involved in any form of consultation is very clear, simply from the fact that members of our party have spoken to hundreds of residents whilst out canvassing leading up to the recent local elections, hardly anyone has been aware of what has been proposed in respect of this plan. Harlow Council has almost exclusively consulted only with other statutory bodies, those with a vested interest in seeing Harlow expand and neighbouring Local Authorities. In doing so, it has failed to engage with the most important people of all, the residents of Harlow. We would make the following points:

The Council has primarily used its website during this entire process, but we know that many older people, those on low incomes and homeless households do not have access to a computer.

The most up-to-date information available shows that 21 % of Harlow's residents were not born in the UK and therefore a considerable number of residents may not have English as their first language. Harlow Council has failed to engage with such residents.

The Council publishes a document called Harlow Times four times a year which is delivered to every home in Harlow. This should have been used to tell residents what was going on, but Harlow Council chose not to do so.

Whilst Harlow Council engages with its tenants and leaseholders using various forums, it has none which includes residents. Harlow Council could and should have set up neighbourhood forums to specifically consult and inform on this plan.

Evidence of this lack of resident involvement can clearly be seen by the fact that supposed consultation earlier in this process only saw 136 submissions being made in response, something Harlow Council should have taken steps to be more inclusive at later stages in the process.

Change To Plan:

Full Reference: O - 6650 - 8621 - BACKGROUND - None

6846 Object

Respondent: Miss Mary Wiltshire [6026]

Agent: N/A

Summary: Object to the whole document. As it is a wish-list rather than set of plan for discussion. It is not much of consultation.

Change To Plan:

Full Reference: O - 6846 - 6026 - BACKGROUND - None

6603 Support

Respondent: East Herts District Council (Mr George Pavey) [8616]

Agent: N/A

Summary: East Herts Council supports the Local Plan's intention to meet its objectively assessed housing needs, including the positive approach taken to reviewing the Green Belt to identify land for such development purposes. East Herts Council further supports Harlow Council's commitment to joint working to address the collective needs of the housing market area in terms of key infrastructure, employment and housing needs.

Change To Plan:

Full Reference: S - 6603 - 8616 - BACKGROUND - None

803

6761 Support**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: PfP are strongly supportive of Harlow's ambition, and pro-activity strategy for growth over the Local Plan period. PfP welcome the opportunity to continue to engage with HDC on the evolution of Harlow's Local Development Plan, whether regarding the above points, or more generally, particularly as the detail on the proposals for the GPE, and Central and Eastern Stort Crossings, continues to progress.

Change To Plan:

Full Reference: S - 6761 - 7958 - BACKGROUND - None

6807 Support**Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]****Agent: N/A**

Summary: Officers have reviewed the Local Development Plan Pre-Submission Publication, and consider that the identified housing, employment and infrastructure needs for development in Harlow to 2033 will be met through delivery of the Plan. Officers are satisfied that the duty to co-operate has been met, and consider the plan to be sound.

Change To Plan:

Full Reference: S - 6807 - 8636 - BACKGROUND - None

6582 Comment**Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]****Agent: N/A**

Summary: we reiterate concerns that the evidence base, is largely significantly dated and in many instances pre-dates the National Planning Policy Framework (NPPF), such that the position established lacks any clarity or weight to enable a developer to reasonably establish the policy requirements prior to the submission of a planning application, whilst also not having regard to significant changes in the local environment as a result of subsequent planning permissions.

Change To Plan:

Full Reference: C - 6582 - 8451 - BACKGROUND - None

6620 Comment**Respondent: Forestry Commission (England) (Ms Corinne Meakins) [8617]****Agent: N/A**

Summary: Thank you for consulting the Forestry Commission on the pre-submission publication. We do not have any comment on the soundness or legal compliance. We would like to draw your attention to the standing advice on Ancient Woodland <https://www.gov.uk/guidance/ancient-woodlandand-veteran-trees-protection-surveys-licences> should you need to assess any sites near to Ancient Woodland when delivering the plan.

Change To Plan:

Full Reference: C - 6620 - 8617 - BACKGROUND - None

6652 Comment**Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]****Agent: N/A**

Summary: This is evidenced by the fact that residents have already been consulted about detailed plans for two of the sites (Lister House and St Andrews Meadow) when the Plan has not been agreed. In addition, running alongside this Local Plan process, is what seems a parallel process involving other sites, such as at Bushey Croft, where Harlow Council has a Planning Application for homes on a playing field site, which is not included in the Local Plan.

Change To Plan:

Full Reference: C - 6652 - 8621 - BACKGROUND - None

6712 Comment**Respondent: Mr James Humphreys [8561]****Agent: N/A**

Summary: Firstly, can I say that the secretive approach to this has been incredibly alarming. When PHE plans were announced there was a full public consultation, and looking at other neighbouring councils, it seems they take a more open and consultative approach. This plan has seemingly been hidden from residents in the hope that nobody notices so that you can continue with the plans. While there is the opportunity to view the plans online and in libraries, it is hard to find and there has been no publication of these to people who actually work 9-5 and the publication period is Thursday 24 May 2018 to Friday 6 July 2018. I hope this is only a publication period and not a consultation period as this less than two weeks nowhere near long enough to invite consultation on something that hasn't even been made public and is hundreds of pages long including evidence base. It looks like it has been rushed and public comment is not actually welcome. At the very least this should be 30 days.

Change To Plan: I believe these plans have serious flaws and should be paused immediately and public consultation should be invited, rather than hoped nobody finds it. In addition, a lot of the evidence based used is over 10 years old, which renders it either out of date or at worst inaccurate, including infrastructure and health. Other more recent reports aren't localised enough or provide the right information needed, such as wildlife and other environmental factor reports seem to have been simply ignored. More worryingly, your link to sign up to be kept informed about developments doesn't work despite numerous attempts to create a log on, I have still not received a registration email so there doesn't seem to be a way to be kept informed even if I am trying to be so.

Full Reference: C - 6712 - 8561 - BACKGROUND - None

6718 Comment**Respondent: Jean Wright [5878]****Agent: N/A**

Summary: This document is an idealistic wish list but trying to achieve quality of life with meeting government required housing numbers is not easy. Nor is the type of housing required necessarily that which will be built. Harlow desperately needs more social housing. There will always be people who cannot afford to buy, cannot afford deposits and rents required by private landlords.

Unless Harlow's assets of green space are seriously protected people moving here for jobs may well not live in Harlow but commute in from villages offering serenity if nothing else. This has been the choice of many professionals working in Harlow.

Change To Plan:

Full Reference: C - 6718 - 5878 - BACKGROUND - None

6721 Comment**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: Uncertainty
Throughout the report, there seems to be "significant levels of uncertainty" in key areas which undermines the subject matter.

Change To Plan:

Full Reference: C - 6721 - 8596 - BACKGROUND - None

6726 Comment**Respondent: Little Hadham Parish Council (Mr Neil Wardrop) [8624]****Agent: N/A**

Summary: The plan appears deliverable and sufficiently meets development needs. The Harlow A&E hospital is the local A&E for Little Hadham residents, please consider this when deciding on a suitable location for the new hospital as part of this plan so that it continues to be accessible. Please provide more details on how/where water is likely to be drawn from to provide water supplies to all the new homes.

Change To Plan:

Full Reference: C - 6726 - 8624 - BACKGROUND - None

6762 Comment**Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]****Agent: N/A**

Summary: The current Adopted Replacement Harlow Local Plan (2006) makes reference to the need to facilitate the improvement of PAH's local health services, guided by a Master Plan as follows:
"Saved Policy CP4: The future development of Princess Alexandra Hospital will be granted planning permission subject to it according with their approved Master Plan."

The previous Master Plan was developed having regard for the constraints of the site; these include a group Tree Preservation Order covering the whole site (TPO/10/92), two Scheduled Monument designations (bowl barrows in the north and east of the site), a Grade II listed building (Parndon Hall) and land designated as a Green Wedge. A strip of land in the south east of the site also contains two central water mains serving the wider Harlow area.

Whilst the draft Local Plan acknowledges the redevelopment of the existing Hospital site is a credible possibility, the Trust would like to see a similar masterplanning policy in this document which supports the redevelopment of the site for hospital uses, should this be identified as the preferred option in the future.

Without this supportive policy basis, the longer-term strategic aims of the Trust in redeveloping and expanding the site would not be acknowledged, and thus in the process, applications for short-term development necessary to achieve this could encounter a lack of planning policy certainty and support.

Change To Plan: The Trust therefore requests that the existing support for a masterplanned approach to redevelopment of the existing site is replicated in the draft Local Plan. The policy could also be flexibly worded to allow this approach to be adjusted in the event that the outcome of the Outline Business Case / Site Selection process identifies a hospital relocation as the preferred option instead.

Full Reference: C - 6762 - 8532 - BACKGROUND - None

6767 Comment**Respondent: Tetlow King Planning (MEGHAN ROSSITER) [8630]****Agent: N/A**

Summary: The Government consulted on proposed changes to the NPPF, and aims to publish the "NPPF2" this month. The proposed changes include a new definition of affordable housing with a number of new categories aimed at widening the scope of the definition to include a wider array of tenures to assist people into homes that meet their needs, including rent to buy under 'other affordable routes to home ownership'. While Rentplus has sought a minor amendment to that definition, we do not anticipate significant changes to be made to the document prior to publication.

The significant level of need for affordable housing in Harlow points clearly to a need for a step change in delivery to meet those needs. The Local Plan Spatial Vision clearly captures this need and sets the right tone for an ambitious approach to maximising delivery of affordable housing over the Plan period. Access to a deposit remains one of the most challenging blockers on accessing home ownership, which even intermediate affordable housing does not resolve; the Council should take a proactive approach to welcoming the delivery of the wider range of affordable tenures set out in the draft NPPF to encourage a more diverse housing stock and to improve the ability of all developers, particularly those bringing forward the new Garden Communities, to deliver an appropriate and higher quantum of affordable housing.

Change To Plan: The definition sought by Rentplus is set out below:
 "d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of affordable or intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement."

Full Reference: C - 6767 - 8630 - BACKGROUND - None

6781 Comment**Respondent: The Roydon Society (S.N. Wilkinson) [8634]****Agent: N/A**

Summary: The Roydon Society supports the comments made by Roydon Parish Council and sent under separate cover recently.

Change To Plan:

Full Reference: C - 6781 - 8634 - BACKGROUND - None

6849 Comment**Respondent: Miss Mary Wiltshire [6026]****Agent: N/A**

Summary: typographical error has been found.

Change To Plan:

Full Reference: C - 6849 - 6026 - BACKGROUND - None

6870 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC has worked to ensure as far as possible through its ongoing engagement and representations with HC throughout plan preparation that this Draft Plan addresses ECC's areas of responsibility consistent with national policy to enable sustainable development. The ECC response to the Draft Plan recommends several areas for clarification to enable effective delivery and amendments to improve policy and explanatory text. ECC will work cooperatively with HC to ensure issues can be positively addressed prior to HC submitting the Draft Plan for examination. It is likely that Statement(s) of Common Ground will be needed to be prepared at that time to address any outstanding issues or ahead of the examination hearings. The approach will be confirmed with HC closer to the time.

ECC has identified a limited number of issues arising through the Draft Plan relating to consistency with national (planning) policy. These are set out in Appendix 1 and most are considered capable of being readily addressed relatively easily, through policy revisions, rewording etc. The main area where ECC recommends a change to ensure consistency with NPPF is in relation to health and well-being matters. It is accordingly recommended that ECC urges the inclusion of an embracing health and well-being policy and sets out requirements for HIAs, to reflect NPPF requirements and the profile of health and well-being within the NPPF. Some basic elements of well-being considerations are evident but these are not deemed sufficiently clear explicit and their scope is too limited. This point was made by ECC at the previous Plan-making stage.

Change To Plan:

Full Reference: C - 6870 - 8452 - BACKGROUND - None

807

6871 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: The Local Plan includes only basic reference to well-being matters. Accordingly, ECC Public Health recommends that an over-arching health and well-being policy and/or a specific Health Impact Assessment (HIA) policy is included in the Local Plan. It is accordingly unclear as to how this specifically supports the NPPF 'Promoting Healthy Communities' sections. This matter was raised by ECC in its representations at the Development Management Policies (Local Plan) consultation stage in 2017. This also means absence of an appropriate policy basis for assessing development proposals (the Plan being largely silent on these matters)

Change To Plan: ECC Public Health recommends adding an over-arching health and well-being policy and a specific Health Impact Assessment (HIA) policy to ensure conformity with the NPPF.

ECC recommends collaborative working prior to Local Plan submission between ECC (Public Health) and HC to set the form of wording.

Full Reference: C - 6871 - 8452 - BACKGROUND - None

6621 Comment

Respondent: GLADMAN (Mr Phill Bamford) [8618]

Agent: N/A

Summary: It is welcomed that the HDLP recognises the need to regenerate the town. However, as set out in Section 4 above, it is considered that the housing requirement across the HMA does not reflect the full level of housing need.

Concern is also expressed over the identification of a number of large scale garden communities in Harlow, Epping Forest and East Hertfordshire in order to deliver substantial housing growth in these areas across the plan period.

New Garden Communities are complex and difficult to deliver. Lead-in times are significant and the infrastructure which is required, often before development is commenced, has a considerable impact on viability.

Great care should therefore be exercised when considering the allocation of large scale strategic sites, especially when several are being proposed in a limited geographical area. This has proven to be the case in North Essex where the examining Inspector for the North Essex Plan has expressed considerable concerns with the Councils' approach to the delivery of Garden Communities.

Change To Plan:

Full Reference: C - 6621 - 8618 - CONTEXT, VISION AND OBJECTIVES - None

6659 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: The transport vision and objectives set out within the Local Plan are progressive and are a clear step change from the traditional private vehicle focused measures. Of key importance is the aspiration for a modal shift outlined in paragraph 2.34 ... There are also aspirations for a modal shift in travel, meaning 60% of travel would be by sustainable modes of transport...

For the level of growth proposed, the impact on the transport network would be acceptable if this 60% modal split is achieved. This is also recognised within paragraph 5.16 of the Pre-Submission Local Plan.

If the Local Plan is to deliver such a significant mode shift, the sustainable travel policies should be extensive and robust. The local Plan contains appropriate support for these policies, and outlines them within the objectives 13 and 14.

Change To Plan:

Full Reference: C - 6659 - 8622 - CONTEXT, VISION AND OBJECTIVES - None

6872 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC has identified that there is very little evidence base coverage of Harlow health portrait and key issues / challenges in early Plan sections, other than at paragraph 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. The district has a higher than average number of lone parent households and higher overcrowding levels compared to the rest of Essex and England. Smoking and obesity levels in Harlow are higher than average, with physical activity rates lower than average' Harlow Health and Wellbeing Strategy (2018-2028):

Change To Plan: ECC (Public Health) recommends adding content in Chapter 2 to outline key health and well-being challenges for Harlow (drawing from the Harlow health profile) This section would also benefit significantly from inclusion of references to the up-to-date Harlow Health and Wellbeing Strategy (2018-2028).

This would not only help frame and inform an Local Plan policy response but that response would also help to implement the aims of the strategy and compliance and delivery of the NPPF.

Full Reference: C - 6872 - 8452 - CONTEXT, VISION AND OBJECTIVES - None

6426 Object Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: The Local Plan has not fully complied with the Regulations on public consultation, with a lack of meaningful engagement on the overall strategy for the HMA as a whole.

Change To Plan: Put the submission on hold. All three LPAs should consult on the overall strategy for the wider sub-region.

Full Reference: O - 6426 - 8588 - The Preparation of the Harlow Local Development Plan - i, ii, iii, iv

6654 Comment Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: We are sure the Council would like to be transparent with its Citizens, but it appears that they have submitted the local plan without giving the details of the additional infrastructure needed in health, education, wellbeing or transport. We therefore feel that the Council should have started the consultation period only when the plan is complete with the infrastructure expectations. It is not acceptable to state in the Sustainability Assessment dated May 201 8 that a Sustainability Transport Corridor Study for Harlow and Gilston Garden Development is currently being prepared.

The council are quite aware that infrastructure was agreed that affects Harlow's population as part of the LA working group and the Infrastructure Assessment dated December 201 7 submitted as part of the Epping Local Plan clearly defines these matters within and on the borders of Harlow.

The council therefore, should be clearly showing its citizens these matters rather than people having to hunt for them in adjoining authorities' plans.

Change To Plan:

Full Reference: C - 6654 - 8621 - The Preparation of the Harlow Local Development Plan - None

6716 Comment Respondent: Jean Wright [5878]

Agent: N/A

Summary: The map used in the pack does not show Gildea Park or the land being developed as a designated building site. This is misleading as anyone looking at it, unfamiliar with the now building site on Gildea Way, would think it was still an open space. It now resembles an industrial site more than a building site with what looks like houses which could be found anywhere in Britain and large heaps of what looks like subsoil which appear to be constantly on the move or being increased in size.

Change To Plan:

Full Reference: C - 6716 - 5878 - The Preparation of the Harlow Local Development Plan - None

6809 Comment Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]

Agent: N/A

Summary: Overall, CCC believes the Plan provides a coherent strategy for future growth of Harlow district, and seeks to meet the identified objectively assessed development needs for housing and employment, as supported by its evidence base. The Plan is therefore considered to be sound.

Change To Plan:

Full Reference: C - 6809 - 8636 - The Preparation of the Harlow Local Development Plan - None

6685 Object Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Registered Parks and Gardens should also be included in the list of heritage assets.

Change To Plan: Registered Parks and Gardens should also be included in the list of heritage assets.

Full Reference: O - 6685 - 8623 - Next Steps - None

6469 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of the Policies Map referred to at paragraph 1.19, but would like to raise a specific objection in respect of:

- (i) the new east-west Green Wedge shown permeating through the East Harlow site;
- (ii) the New Allotment provision in the same location; and
- (iii) the Indicative East-West Sustainable Transport Corridor, as it passes through New Hall.

Change To Plan: Our client respectfully requests that the Policies Map is amended to show the following:

- an "Indicative Green Wedge" rather than a "Green Wedge" on-site at East Harlow;
- "Indicative New Allotments" rather than "New Allotment" on-site at East Harlow; and
- the "Approved East-West Sustainable Transport Corridor" rather than an "Indicative East-West Sustainable Transport Corridor" where it passes through the New Hall site.

Full Reference: O - 6469 - 5769 - The Policies Map - ii

6848 Object

Respondent: Miss Mary Wiltshire [6026]

Agent: N/A

Summary: Policies Map does not shows the detail of Gilden way. indicated green wedge and green finger lands not generally open for public access.

Change To Plan:

Full Reference: O - 6848 - 6026 - The Policies Map - None

6780 Comment

Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]

Agent: N/A

Summary: As set out above a high quality hydraulic sewer model has been created and we are currently reviewing the sites specified in the Local Plan to assess the whether it is likely that any network reinforcement works will be required to support their delivery. The outputs from this work will feed into the Water Cycle Study being prepared by the Council and we will provide comments on the sites as soon as they are available.

Notwithstanding the above, Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation.

Thames Water will deliver any necessary upgrades required to support growth and these will be funded through the Infrastructure Charge.

In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding and pollution of land and water courses. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme. This is important as the potential impacts on the network can be affected by factors including the scale of development, timing of delivery, point of connection and development elsewhere in the catchment.

Change To Plan:

Full Reference: C - 6780 - 8433 - Evidence Base - None

6789 Comment

Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]

Agent: N/A

Summary: Further justification is required as to why the full OAN for the West Essex and East Hertfordshire HMA is not proposed to be met, particularly given that an updated MoU has not been prepared to reflect the latest SHMA Update and that additional capacity is available at sustainable allocations, such as Latton Priory

Change To Plan:

Full Reference: C - 6789 - 7646 - Evidence Base - None

6833 Comment

Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: There maybe a slight growth to the local Hatches from building extra dwellings, but the Hatches are not used for 'the weekly shop', but as a back-up to those items that have been forgotten on the weekly shop.
Online food shopping is a growth industry and therefore reliance on buses and private vehicles has already reduced.
Owners of private vehicles will always prefer to do their shopping at supermarkets in their cars as their 'travel choice', than the alternative of public transport, consequently it is certain that there will not be a 'modal shift'.

Options B or C, in Table 5.3 for the HS2-5 site remains at 36 dwellings, however, paragraphs 1-3 are pertinent to the effects of what could be built on the land, the infrastructure, transport, existing built-up areas within close proximity of homes, the landscape of Harlow and countryside and the impact of design to the layout of existing streets, is contrary to the original Master Plan of Sir Frederick Gibberd.

In my opinion this is going to be detrimental to the quality of life for all the existing residents of Harlow. This could lead to working people leaving Harlow to find more pleasant areas of the country to live in. This in turn would increase the proportion of very young and old people, thus increasing the demand on Harlow council for social spending, whilst the tax paying base has decreased.

Change To Plan:

Full Reference: C - 6833 - 5035 - Sustainability Appraisal and other supporting documents - None

6834 Comment

Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: 'Air pollution in Harlow is considered generally low and the air quality is improving in the District' I do not see how creating more homes and consequently more vehicles can keep the pollution and air quality in Harlow low. Creating 'sustainable transport corridors' in the belief that owners of vehicles will shift to public transport, is from my personal observation, something that will just not happen. (Consider this, if you needed to bring home the weekly shopping and you had a choice of using your car or a bus, which would you choose?) Furthermore, the consequential increase in commercial vehicles that will come into Harlow to sustain its increased population will have a detrimental effect to the infrastructure, in particular the roads in air quality.

Change To Plan:

Full Reference: C - 6834 - 5035 - Sustainability Appraisal and other supporting documents - None

6835 Comment

Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: By focusing housing and employment in the east, even with good public transport and infrastructure, does not equate to reducing dependency on the car. The Gibberd Master Plan was not to have housing too near to the industrial estates and cycling and public transport was the preferred mode of transport at that time.
Commuters cannot rely on bus companies to provide sustainable and reliable public transport to their places of employment. Furthermore, buses do not always provide a service that goes to the required destination nor run at the times required. The cost of fares can also be off-putting to workers. The overall consequences of this, will be to increase pressure on key transport corridors, exacerbating congestion problems where they exist and possibly creating new areas of congestion where they don't currently exist.

Change To Plan:

Full Reference: C - 6835 - 5035 - Sustainability Appraisal and other supporting documents - None

6836 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion, the design of every new-dwelling that Harlow Council commissions, should have suitable facilities* for the occupiers to install charging points when they make the transition from petrol/diesel to electric vehicles . .

* e.g. garages or hard standings close to the dwellings and close to high power electric cables that can carry power to the occupier's charging point.

There is a 'chicken and egg' situation where people are reluctant to change to electric vehicles if they consider there is inadequate facilities for charging, whilst councils and businesses seem to be reluctant to invest in charging points whilst there are so few electric vehicles on the road.

In my opinion, Harlow Council should become a leader in the provision of charging points for electric vehicles by providing them in all new builds and public car parks. In addition it should create an incentive for local businesses with parking facilities to provide charging points for its employees and customers.

Change To Plan:

Full Reference: C - 6836 - 5035 - Sustainability Appraisal and other supporting documents - None

6837 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: From the above Policy IN3 I assume that any new builds will have parking provided near the residents home for 'accessibility and promoting their travel choice'. It does not automatically follow that Policy IN3 will reduce reliance to travel in any particular vehicle 'while ensuring that on-street parking issues are not created'.

There are already on-street parking issues for existing residents, as the vehicle requirements outweigh the available space, and consequently 'hardstands' on residents homes are becoming the norm, which could have future long-term drainage issues (this is not just a problem in Harlow, but countrywide).

Change To Plan:

Full Reference: C - 6837 - 5035 - Sustainability Appraisal and other supporting documents - None

6838 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion it is not appropriate to conclude these plans will have a neutral effect for all the reasons I have previously stated. I am alarmed to read that the mitigation measures will be an 'iterative process'. To me, this sounds like 'let the people of Harlow suck it and see', which is not the way I would expect a Report of this kind to conclude.

Change To Plan:

Full Reference: C - 6838 - 5035 - Sustainability Appraisal and other supporting documents - None

6839 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I agree with the first sentence of 9.40, that the loss of greenfield land has the potential for a cumulative negative effect on biodiversity through habitat loss and fragmentation. For this reason I object to building dwellings on the playing field labelled HS2-5 site. This playing field is surrounded by trees and hedgerows in a built-up area.

Please remember the Gibberd Master Plan included 'green wedges and green fingers as an infrastructure to provide ecological corridors for wildlife', which need to be protected, 'which are key physical features of Harlow that have shaped its subsequent growth'.

Change To Plan:

Full Reference: C - 6839 - 5035 - Sustainability Appraisal and other supporting documents - None

6840 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I note that the report acknowledges that site specific policies will be required and despite this, its concluded that uncertain minor negative effects will be inflicted on the residents of Harlow. For the reasons and objections I have stated, I do not believe the negative effects will be minor- they are more likely to be major negative effects.

Change To Plan:

Full Reference: C - 6840 - 5035 - Sustainability Appraisal and other supporting documents - None

814

6841 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion building more dwellings throughout Harlow will increase the number of vehicles in Harlow and this will inevitably lead to greater emissions of pollutants. If you've seen some of the thick black smoke emitted by some of the buses in Harlow, you would probably agree with me that quoting the 7 use of public transport is not necessarily going to reduce obnoxious emissions.

Change To Plan:

Full Reference: C - 6841 - 5035 - Sustainability Appraisal and other supporting documents - None

6842 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: HS2-5 is a playing field, with trees, bushes and hedgerows and a source of drainage for lower-lying homes. It is constantly used by Radburn Close residents for a variety of purposes that includes viewing as a source of relaxation and enjoyment, a cycle track, playing football, golf etc.

Change To Plan:

Full Reference: C - 6842 - 5035 - Sustainability Appraisal and other supporting documents - None

6843 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I agree with the sentiments expressed in the above paragraph provided all new dwellings are on brown-field sites and green sites are left undeveloped as was envisaged in the Sir Frederick Gibberd's original plans. If Harlow is made into a concrete jungle, all the laudable sentiments expressed in the above paragraph will be in serious jeopardy.

Change To Plan:

Full Reference: C - 6843 - 5035 - Sustainability Appraisal and other supporting documents - None

6844 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: (1). Disagree that the long-term negative effects will only be minor.
 (2). The report author acknowledges uncertainty on the subject of negative effects, thereby strengthening our arguments that the effects will be major, not minor.
 (3). We cannot understand the logic of saying that a 'no plan' scenario will necessarily result in greenfield loss. Naturally there should be a plan, but this should not take away greenfield sites within Harlow. If housing pressure demands the use of greenfield sites, these should be on the outskirts of Harlow, not within Harlow.

Change To Plan: The significance of effects will be mainly caused by the developments within Harlow and only to a lesser extent by those developments surrounding Harlow.

Full Reference: C - 6844 - 5035 - Sustainability Appraisal and other supporting documents - None

815

6854 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: HARLOW GREEN BELT REVIEW (2016)

The Council subsequently subdivided those eight areas which scored averagely or poorly in the Stage 1 Assessment to allow them to be further assessed against purposes 3 (safeguarding the countryside from encroachment) and purpose 4 (preserving the setting and special character of historic towns). The Site at Moor Hall Road was located within sub-area 8.1 which was assessed as having a minor contribution to purpose 3 and no contribution to purpose 4. The Council therefore determined that this sub-area is not functioning Green Belt as assessed against Paragraph 80 of the NPPF.

At present, the Green Belt boundary at Parcel 8.1 is defined by the rear gardens of properties on Windmill Fields and surrounding residential roads. The varied garden depths and boundary features forms a weak boundary with the Green Belt. The location of area 8.1 adjacent to the existing built up area of Churchway Green to the west and positioned between the urban area and the M11 motorway to the east, provides an opportunity to strengthen the Green Belt boundary to the east of Harlow using a significant existing permanent physical feature of the M11 motorway. This would reinforce the Green Belt boundary in perpetuity in accordance with NPPF paragraph 85.

Change To Plan: The Site south of Moor Hall Road falls within parcel 8.1, located directly adjacent to the existing built up area. The Site sits within an area of land which is considered by the Council as not functioning as Green Belt when assessed against the five purposes as defined at Paragraph 80 of the NPPF and it is therefore considered that this land should be released from the Green Belt in accordance with the recommendations of the Council's Green Belt Review.

Full Reference: C - 6854 - 8640 - Sustainability Appraisal and other supporting documents - None

6427 Object

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: As noted in response to paragraphs 1.9 - 1.19 above, SHN notes the efforts made by Harlow District Council to fulfill the Duty to Co-operate. The overall strategy for Harlow and the surrounding area, however, has not been subjected to any meaningful engagement with local communities. There is a democratic deficit which should be addressed.

Change To Plan: Put the submission on hold. The three LPAs should jointly prepare a strategy for Harlow and the sub-region, which should be published for public consultation.

Full Reference: O - 6427 - 8588 - Duty to Co-operate - i, ii, iii

6810 Support

Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]

Agent: N/A

Summary: Duty to Co-operate has been met through the ongoing engagement via the West Essex authorities forming Harlow's Housing Market Area. The Plan's allocations are unlikely to have any adverse cross-boundary impacts on Chelmsford.

Change To Plan:

Full Reference: S - 6810 - 8636 - Duty to Co-operate - None

6699 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: There has clearly been a significant level of co-operation between Epping Forest and those other authorities in the East Herts and West Essex Housing Market Area (HMA). The four authorities forming this HMA have worked together to identify the housing needs for the area and then agreed a distribution between each authority. This distribution places significant emphasis on growth in and around the Harlow area, a similar approach to that identified in the East of England Regional Spatial Strategy. Whilst we welcome the level of co-operation that has been achieved between the four authorities in the HMA, we remain concerned regarding the approach taken in assessing the level of housing needs for the HMA and the subsequent approach taken to distributing needs across each LPA. In summary we consider that there the Council's within the HMA have underestimated their housing needs by unjustifiably reducing the demographic starting point and taking insufficient account of market signals. We consider that there is a need to allocate further sites across the HMA in order to meet needs. However, in relation to Harlow we recognise the limited ability to increase delivery given the tightly bounded nature of the Council's boundary. A brief appraisal of the Council's assessment of housing needs is set out below.

Change To Plan:

Full Reference: C - 6699 - 8450 - Duty to Co-operate - None

6826 Comment

Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]

Agent: N/A

Summary: EFDC are pleased to note the Plan's reference to the Duty to Cooperate and to the agreed MoUs to which EFDC is a signatory. Further detail could be given on the Duty to Cooperate working that has taken place such as through the Cooperation for Sustainable Development Board. This would further emphasise the productive and collaborative working between the Essex, Hertfordshire and Greater London authorities that has taken place since the creation of the Board in 2014.

Change To Plan:

Full Reference: C - 6826 - 8637 - Duty to Co-operate - None

6831 Comment Respondent: **Epping Forest District Council (Ms Alison Blom-Cooper) [8637]** Agent: **N/A**

Summary: Paragraph 1.31 makes reference to the MoU with respect to the management of growth from development on the Epping Forest SAC. It would be helpful, for the sake of completeness, to provide further commentary which explains that this is in relation to the potential effects of recreational pressure and air pollution on the integrity of the SAC.

EFDC recognises that there are no European designated nature conservation sites within the Harlow District Council administrative area. However, it is suggested that again, for completeness, and in order to reflect the MoU, that reference is made to the Epping Forest SAC site (and it is suggested the Lee Valley SPA/Ramsar site) as being located to the south and south east of Harlow within the supporting text to Policy WE3 Biodiversity and Geodiversity, particularly bearing in mind the statutory 'in combination' test applicable under Habitats Regulations. It would also be helpful to include the Plan's Habitats Regulations Assessment (HRA) findings with regard to these two European sites and in particular to those findings in relation to the Epping Forest SAC.

Change To Plan:

Full Reference: C - 6831 - 8637 - Duty to Co-operate - None

CHAPTER: **CONTEXT, VISION AND OBJECTIVES** Harlow and Gilston Garden Town

6446 Support Respondent: **Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** Agent: **N/A**

Summary: I welcome the development of Gilston Garden Town. It is good to see the focus on infrastructure development generally.

Change To Plan:

Full Reference: S - 6446 - 8586 - Harlow and Gilston Garden Town - None

6428 Comment Respondent: **STOP Harlow North [8588]** Agent: **Mr Jed Griffiths [8576]**

Summary: Paragraphs 1.34 and 1.35 acknowledge the key assumption underlying the Local Plan - the delivery of the Harlow and Gilston Garden Town. In the view of SHN this is a fundamental weakness of the Plan, which is over-ambitious and too dependent on external circumstances. Proposals for the Gilston Area, to the north of Harlow, have been set out in a Concept Framework, which shows that development would be delivered in seven garden villages. From the evidence of the Concept Framework, it would appear that these elements would develop independently from Harlow and would contribute little to its regeneration.

Change To Plan:

Full Reference: C - 6428 - 8588 - Harlow and Gilston Garden Town - None

6666 Comment Respondent: **Hertfordshire County Council (Mr Martin Wells) [8622]** Agent: **N/A**

Summary: Paragraph 1.34 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.

Change To Plan:

Full Reference: C - 6666 - 8622 - Harlow and Gilston Garden Town - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

Applying the policies in the assessment of planning applications

6580 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: We would request that page 7 'Applying the policies in the assessment of planning applications' point 1.36-1.42 include a section encouraging developers to seek pre-application advice. Where their proposal is adjacent to our waterway, they should consult the Trust, we provide free pre-application advice. We would also advise developers to consult our Code of Practice for practical advice:

Change To Plan:

Full Reference: C - 6580 - 8612 - Applying the policies in the assessment of planning applications - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

Population Profile

6850 Object

Respondent: Mr John Graham [8542]

Agent: N/A

Summary: The population growth forecast is questionable.

As the former partner of Frederick Gibberd, I worked with him for more 30 years from 1952, from key buildings in Harlow to the design of the eastern side of the market square. I am a fellow of the R.I.B.A.

Change To Plan:

Full Reference: O - 6850 - 8542 - Population Profile - None

6701 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: We would agree with the Council that the 2014 based Sub National Population Projections and Household Projections, published by ONS and DCLG respectively, are the starting point for assessing housing needs. However, the Council considers the five-year migration trend used in the preparation of both these datasets to overestimate the level of migration in future. The Council deems that a 10-year trend better reflects future trends and that the five-year migration trend is an "unprecedented" representation of migration when considered against the context of the last 25 years.

Change To Plan: We would therefore suggest that there is sufficient evidence to support the migratory patterns set out in the DCLG official projections and given that these are favoured by Government and considered to be robust they should form the demographic starting point for considering OAN. However, the Council have not looked to justify their position other than to state that it is their favoured approach. At present the Government supports the use of the official projections, which uses a five-year trend, and without further and compelling evidence as to why a different trend should be used the official projections should be considered robust.

Full Reference: C - 6701 - 8450 - Population Profile - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

Housing and Affordability

6448 Comment

Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]

Agent: N/A

Summary: Affordable housing is a local issue eg when I spoke to a couple looking too get married recently. Though this is acknowledged (30% desirable), can more be done to make sure that developers include significant affordable housing? ie that this is more than an aspiration. Developers tend to want to build more expensive homes and this wants to be resisted wherever possible (hopefully resulting in something suitably balanced.)

Change To Plan:

Full Reference: C - 6448 - 8586 - Housing and Affordability - None

6449 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the proposed new M11 junction for reasons of developing the local economy. This needs simply to be done; virtually any additional junction within reason is better than no new one.

Change To Plan:

Full Reference: C - 6449 - 8586 - Transport and Accessibility - None

6660 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Whilst the Local Plan has an overarching theme of a significant increase of sustainable travel, HCC are concerned that the transport related policies are not supportive enough and the policy wording lacking in crucial areas to achieve the modal shift to 60% sustainable travel. A primary area of concern is the lack of a clearly defined modal hierarchy. Whilst it is referred to throughout, it is not presented definitively. Another key concern is the lack of linkage with the parking policy. In order to encourage a switch to sustainable transport modes, there is a need to limit the amount of parking provision, particularly at locations served by the proposed sustainable transport corridors. Whilst Essex County Council's parking strategy allows some flexibility, there is concern it is not in line with the ambition of the sustainable travel target.

Change To Plan:

Full Reference: C - 6660 - 8622 - Transport and Accessibility - None

6679 Comment **Respondent: Highways England (Mr Mark Norman) [7939]** **Agent: N/A**

Summary: Highways England interest with the proposal is with the potential impact on the Strategic Road Network (SRN) and its ability to be able to operate safely and efficiently with the proposals in place. In particular, our interest relates to the M11, Junction 7 being the nearest access point of the proposed development to the SRN. It is noted that planning permission has been sought and design is progressing for a new M11 Junction 7a, and this will need to be in place when the development in the plan commences construction if problems at M11 J7 are to be avoided. This applies more so to site HS 3 than any of the other sites, which individually are likely to have relatively little impact upon M11 J7.

Change To Plan:

Full Reference: C - 6679 - 7939 - Transport and Accessibility - None

6722 Comment **Respondent: Mrs Karen Garrod [8596]** **Agent: N/A**

Summary: For the purposes of sustainable travel plans, the report justifies sustainable travel methods with the inclusion of cycling, walking and public transport. A high emphasis is placed on residents cycling, walking and using public transport. However, most working people are 'time poor' and these methods are time consuming.

Change To Plan:

Full Reference: C - 6722 - 8596 - Transport and Accessibility - None

820

6791 Comment Respondent: **Hallam Land Management & Commercial Estates Group (Mike Newton)** Agent: **N/A**
[7646]

Summary: The opportunity to create a north/south Sustainable Transport Corridor through Harlow is supported subject to further assessment and, if found sound, should carry a specific policy commitment.

Change To Plan:

Full Reference: C - 6791 - 7646 - Transport and Accessibility - None

6873 Comment Respondent: **Essex County Council (Mr Rich Cooke) [8452]** Agent: **N/A**

Summary: Text may not place sufficient emphasis on the importance of and localised necessary characteristics of sustainable travel. ECC (Highways) recommends the paragraph is amended.

Change To Plan: ECC (Highways) recommends the following amendments:

"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."

The deletion of the last few words of the sentence is recommended as there are other ways of improving bus journey times, such as providing additional Passenger Transport infrastructure.

Full Reference: C - 6873 - 8452 - Transport and Accessibility - None

6874 Comment Respondent: **Essex County Council (Mr Rich Cooke) [8452]** Agent: **N/A**

Summary: Addition to text suggested in the interests of ensuring that the sustainable travel hierarchy is included, reflected appropriately and sets context for policies / strategies.

Change To Plan: ECC (Highways) recommends the following additional text is added:

"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."

Full Reference: C - 6874 - 8452 - Transport and Accessibility - None

821

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Green Infrastructure and the Natural Environment

6664 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: The reference to Green Infrastructure (GI) is fully supported. However, there is no mention of the River Stort as a key strategic GI asset. There is also no mention of local distinctiveness or wording to promote the conservation and enhancement of landscape character and visual amenity. These demonstrate an ambition to create places that are not only high quality, but attractive too, and provide vital hooks to local landscape/townscape character assessment that are an important tool to help guide positive change (see comment under local distinctiveness).

The reference to GI and a strong network of green wedges and fingers is well embedded throughout the plan. There is concern however that it should be clearer that the definition of GI includes both green and blue assets, in particular the Stort River Valley that is an important regional asset that runs along the boundary between Hertfordshire and Essex.

It is the view of HCC that the Stort River Valley could be brought into public use, as a way of integrating the new communities in the Gilston Area with the expansion of Harlow to the south. This area is identified as a rural green link in the Hertfordshire Green Infrastructure Plan, where the connectivity of the GI network could be strengthened, in order to encourage public access within this area.

There is no reference to the Hertfordshire Strategic Green Infrastructure Plan (Incorporating the Green Arc area) which also covers Harlow and the wider area. This document should be a key aspect of the evidence base, and recognises key GI proposals/projects for the river valley of the Stort, the woodland arc and strategic connections.

Change To Plan:

Full Reference: C - 6664 - 8622 - Green Infrastructure and the Natural Environment - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Historic Environment

6686 Object

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Include Registered Parks and Gardens.

Change To Plan: Include Registered Parks and Gardens.

Full Reference: O - 6686 - 8623 - Historic Environment - None

822

6429 Comment **Respondent: STOP Harlow North [8588]**

Agent: Mr Jed Griffiths [8576]

Summary: Harlow should address its economic problems within the District Council boundary. There is no guarantee that the provision of large-scale housing would solve the problem.

Change To Plan:

Full Reference: C - 6429 - 8588 - Issues and Challenges - None

6875 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: Wording revisions recommended to reflect the context of future travel requirements more fully, beyond public transport (although the first extra word suggested is descriptive in nature, the latter wording addition is necessary to describe the full extent of transport investments required).

Change To Plan: ECC (Highways) recommends the following suggested amendment:

"Residential growth, located, managed and phased appropriately, will help to provide the investment needed to deliver infrastructure requirements including improvements to sustainable 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."

Full Reference: C - 6875 - 8452 - Issues and Challenges - None

6876 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: It is unclear what is meant by this paragraph in the context of delivering major infrastructure through its current wording. Amendments are recommended to provide clarity

Change To Plan: ECC (Highways) suggests an amendment of this paragraph to:

"Significant behavioural change..." And: "... ensure Harlow is an attractive, sustainable and healthy town ..."

NB wording 'attractive' is meant in context of the town's ability to attract visitors, investors, etc.

Full Reference: C - 6876 - 8452 - Issues and Challenges - None

6447 Support

Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]

Agent: N/A

Summary: I welcome the development of Gilston Garden Town; the work for the relocation or replacement of Princess Alexandra Hospital; the focus on the Town Centre (PR5) and the focus on regeneration generally. It is good to see the focus on infrastructure development generally.

Change To Plan:

Full Reference: S - 6447 - 8586 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6460 Support

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: The Trust welcomes that Harlow's vision contains reference to its residents having excellent sporting, leisure and cultural facilities.

Change To Plan:

Full Reference: S - 6460 - 216 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6461 Support

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: We also welcome that the provision and enhancement of Harlow's sports, leisure, recreational facilities and cultural opportunities are included as a strategic objective.

Change To Plan:

Full Reference: S - 6461 - 216 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6687 Support

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Welcome reference to delivering high quality design through new development whilst protecting and enhancing the districts historic environment.

Change To Plan:

Full Reference: S - 6687 - 8623 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6729 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the spatial vision's recognition of the value of Green Infrastructure and the ambition to retain and supplement existing green wedges. We note that Local Plan Strategic Objective mentions 'revitalised green spaces', however we would advise that these should be strengthened to include objectives specifically relating to the safeguarding, creation and enhancement of green infrastructure and environmental designations under the 'Placeshaping (Enhancing the quality of the built environment) theme.

We are pleased to see the positive approach to the environment supported in the Local Plan Vision for the LSCC Core Area and commend the recognition of the economic value of green assets.

Change To Plan:

Full Reference: S - 6729 - 8628 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6411 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Page 22 Local Plan Strategic Objectives: Objective 1 is to 'Create and enhance high quality built environments which are well connected to revitalised green spaces'. This we do not object to, but we feel that recreational access to all green spaces for all user groups is important and should be reflected within Harlow's key objectives.

To make this Plan sound, we suggest that the wording should be amended to read 'Create and enhance high quality built environments which are well connected to revitalised fully accessible green spaces'.

Change To Plan:

Full Reference: C - 6411 - 7887 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6430 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: The spatial vision set out in this section of the Local Plan is heavily dependent on the delivery of the Harlow and Gilston Garden Town, which is opposed by STOP Harlow North (SHN). From the summary of infrastructure projects, it would appear that the only real certainty is the provision of the additional interchange on the M11 (Junction 7A). Government commitment to Cross Rail 2 has not been finalised. The four tracking of the West Anglia main line is also in doubt, because of costs and construction difficulties.

Change To Plan:

Full Reference: C - 6430 - 8588 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6568 Comment**Respondent: Canal & River Trust (Ms Tessa Craig) [8612]****Agent: N/A**

Summary: Strategic Objective 1 promotes built environments well connected to green spaces. The Trust sees the River Stort as a key green space for Harlow providing connectivity for sustainable travel and open space for recreation and wellbeing. Along sections of the River Stort are areas identified in the Policies Map as employment land. Links from the proposed 3,000 new homes at Gilston Garden Town to the north of the employment land can be made via the towpath, which feeds into Strategic Objectives 13 and 14.

Strategic Objective 13 encourages sustainable modes of transport and objective 14 seeks to improve sustainable transport links to community facilities. Again, the River Stort and its towpath is an important transport route with the potential to link up people with open space and facilities. The Trust supports these strategic objectives.

Strategic Objective 3 relates to climate change. Waterways are able to be used for heating and cooling of buildings, and the Trust have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. Developers should be encouraged to explore this and other innovative technology where their site is adjacent to the River Stort.

Change To Plan:

Full Reference: C - 6568 - 8612 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6622 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman support the Council's Spatial Vision and particularly the provision of sufficient new homes to meet local need and significantly increase the provision of affordable housing.

This clearly reflects the Council's Corporate Priorities with more and better housing sitting at the top of the Council's stated aims.

This priority is reflected in the Council's Strategic Objectives 4, 5 and 6 which are also supported.

Harlow also is located within the London Stansted Cambridge Corridor (LSCC) and is clearly key to the delivery of substantial growth over the Local Plan period that will support the economic objectives of the LSCC.

Change To Plan:

Full Reference: C - 6622 - 8618 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6667 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Figure 3.1: Spatial vision for Harlow to 2033, based on the Harlow Corporate Plan 2017. Improvements to sustainable modes would not conflict with HCC's Local Transport Plan (LTP). However, the proposed route of a northern bypass or whether it would in fact be in East Herts District is unknown. If this is the case it may need to be considered further.

Figure 3.3: Local Plan Strategic Objectives. Reducing the need to travel by car and improving options for sustainable travel that are outlined in paragraphs 13 and 14, are approaches that are reflected in HCC's LTP.

Change To Plan:

Full Reference: C - 6667 - 8622 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6751 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: HDC identifies the pressing need for the urgent economic and social regeneration of Harlow which can only be delivered through a combination of housing and economic development. This is clearly articulated in HDC's evidence base which explains that insufficient land exists within Harlow (given its tight administrative boundaries) to satisfy growth and regeneration requirements. As a result, it is incumbent on surrounding Council's to work collaboratively with HDC to assist in meeting the development requirements that cannot wholly be met within Harlow's administrative boundary.

PfP strongly support the need for regeneration within Harlow which has been a strategic objective of regional and local planning policy and guidance for over a decade.

The New local Plan and the initiatives being brought forward under the wider 'Garden Town' banner can help support the long-awaited delivery of these objectives.

The London-Stansted-Cambridge Consortium lists Harlow as an integral economic location and labour market needed to support the prosperity of the corridor (LSCC, An Agenda for Jobs, Growth and Improved Liveability, 2014).

Development at GPE will deliver substantial new housing comprising a broad mix of unit types and tenures that can help support the economic stimulus of this part of the M11 corridor, building on relationships with Stansted airport and the Enterprise Zone at Harlow, as well as supporting existing travel to work patterns.

PfP therefore strongly support Harlow's overall ambition set out within the Pre-Submission District Plan, in particular Harlow's role as an employment location and the need for a Skills Strategy (Policies ED1, ED2, and ED3). Harlow's role as a retail centre is also encouraged. A residential led mixed-use development at GPE will help support the economic and social regeneration of Harlow and enable the strategic objectives to be achieved.

Change To Plan:

Full Reference: C - 6751 - 7958 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6877 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: In response to the evidence base on Harlow health and well-being issues, the Local Plan vision, Local Plan themes and Local Plan objectives need revising and substantial content added to frame the overall Local Plan approach to Health and Well-being, including the current (brief) references to

* Harlow's residents will be more active, taking advantage of Harlow's excellent

* Sporting, leisure and cultural facilities

* 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 current 'Lifestyles' Objective also needs review and revision:

* '11. To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district'

Change To Plan: ECC (Public Health) recommends adding content in Figure 3.1 and 3.3 to address these matters in response to the evidence base.

A form of wording is not proposed yet but ECC suggests that it will collate this, review best practice approaches suggested to other authorities and review this collaboratively with HC in order to set out agreed Local Plan content prior to Local Plan submission and in collaboration with HC.

Full Reference: C - 6877 - 8452 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

London Stansted Cambridge Consortium

6688 Support**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: Welcome reference to maintaining and enhancing the special character of the area including the locally distinctive historic character of its market towns and rural settlements.

Change To Plan:

Full Reference: S - 6688 - 8623 - London Stansted Cambridge Consortium - None

6431 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: As stated in representation 6428 above, the London-Stansted-Cambridge Corridor vision and strategy has not been subject to any formal public consultation. The Consortium is an unelected association of both public and private sector organisations. Its overall policy for growth, with Harlow as part of a "core" area has not been part of any meaningful public debate, yet it underpins the concept of the Harlow and Gilston Garden Town. This is anti-democratic.

Change To Plan:

Full Reference: C - 6431 - 8588 - London Stansted Cambridge Consortium - None

6878 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC recommends that wording of objective 13 should be enhanced and clarified, to make clear the form of transport that needs targeting.

Objective 14 needs revision to expand its scope beyond just travel to access 'community facilities'.

Change To Plan: ECC (Highways suggests amending Local Plan objectives as follows:

"13. Reduce the need to travel, in particular by private single occupancy vehicle, and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport

Amend objective 14 to read:

'14. Improve transport links, particularly for sustainable modes of transport, to access all facilities, including social, leisure, community, health facilities, education and jobs

Full Reference: C - 6878 - 8452 - London Stansted Cambridge Consortium - None

827

6465 Support **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client, Miller Homes, controls 251 hectares (ha) of agricultural land, bounded by Gilden Way / Sheering Road, the M11, Church Langley and New Hall Farm, to the east of Harlow.
Our client supports the three key aims of the Spatial Development Strategy.

Change To Plan:

Full Reference: S - 6465 - 5769 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6506 Support **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client, Miller Homes, controls 251 hectares (ha) of agricultural land, bounded by Gilden Way / Sheering Road, the M11, Church Langley and New Hall Farm, to the east of Harlow.
Our client supports the three key aims of the Spatial Development Strategy.

Change To Plan:

Full Reference: S - 6506 - 5769 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6669 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**
Summary: Paragraphs 4.21 and 4.22. The wording within the paragraphs would not conflict with HCC's LTP. However, there is no wording within the paragraphs as to how connectivity with the new Garden Cities will be achieved or ensured. In addition, paragraph 4.22 mentions the cycle and pedestrian paths that will contribute to leisure and sporting needs. Such options would also contribute to health and wellbeing as well as having environmental (and air quality) benefits, if it enables people to make more journeys via non-car modes.

Change To Plan:

Full Reference: C - 6669 - 8622 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6792 Comment **Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]** **Agent: N/A**
Summary: We support the provision of the Strategic Infrastructure required as part of the Latton Priory site and the principle of Key Gateway Locations

Change To Plan:

Full Reference: C - 6792 - 7646 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6689 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Suggest changing managed to enhanced in line with the wording in the NPPF.

Change To Plan: Suggest changing managed to enhanced in line with the wording in the NPPF.

Full Reference: O - 6689 - 8623 - Placeshaping - None

6668 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 4.8. The wording within this paragraph would not conflict with HCC's LTP. However, the wording within this paragraph does not mention joint working with neighbouring authorities to ensure connections between future areas such as Gilston that would join up facilitating movement into Harlow particularly by sustainable modes.

Change To Plan:

Full Reference: C - 6668 - 8622 - Placeshaping - None

6879 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: This paragraph sets out Gibberd's master plan principles, but does not refer to the (Town & Country Planning Association) Garden City principles, which do not appear to be referenced in the LDP until section 5.14. ECC strongly suggest these should be specifically referenced in the Placeshaping chapter of the Local Plan.

Change To Plan: ECC recommends a revision reflecting the need to set out the Garden City principles early, to avoid any misunderstanding that only the New Town / Gibberd principles apply where new development is to be contemplated and designed.

Amend paragraph 4.6 to also reference the Garden City principles.

Full Reference: C - 6879 - 8452 - Placeshaping - None

6467 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Although our client is broadly supportive of Garden Town design principles, the Spatial Vision and Design Charter referred to in paragraph 4.13 has not been published for consultation purposes. With this in mind, our client wishes to raise a holding objection to paragraph 4.13 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter is available.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6467 - 5769 - Housing - iii

6466 Support

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports reference in paragraph 4.11 to the need to allocate a strategic housing site on open land in the east of the District.

Change To Plan:

Full Reference: S - 6466 - 5769 - Housing - None

6459 Comment

Respondent: NHS West Essex CCG (Mrs Jolene Truman) [8584]

Agent: N/A

Summary: West Essex CCG anticipate that the additional residents in Latton Priory, Sumners and Katherines, although in the Epping Forest District will register with Harlow GP Practices and therefore support the need for sufficient transport infrastructure to enable patient travel from these sites in Harlow. The specifics of the location, timing and size of the additional facilities needed for the additional growth in Harlow, will be subject of further discussion and planning to support self care and virtual management for patients, support development of larger sites and optimise use of space across health an care services to enable integrated services.

Change To Plan:

Full Reference: C - 6459 - 8584 - Housing - None

6700 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The Council set out in policy a housing requirement for 9,200 new homes between 2011 and 2033. This requirement is greater than the OAN identified in the SHMA due to the redistribution of housing needs agreed between the four authorities that comprise theHMA. For Harlow the housing requirement has been determined by the duty to co-operate and the fact that it is considered a more appropriate location for development within the HMA. Whilst such joint working is positive it is important to ensure that the additional capacity which has been identified by the Council is based on a sound evidence base. We are concerned that the additional capacity in Harlow for further development is a result of a SHMA that underestimates OAN for Harlow, and indeed across the HMA. This would mean that whilst Harlow would appear to be meeting its housing needs we do not consider the authority to have additional capacity to meet development needs arising in the rest of the HMA. Our two key concerns regarding the SHMA is the use of a ten-year migration trend and the level of uplift being proposed to address market signals.

Change To Plan:

Full Reference: C - 6700 - 8450 - Housing - None

6880 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: In this section, explicitly stated considerations do not include the word 'Sustainable'. ECC therefore suggests inclusion of this to strengthen the current wording in paragraph 4.13. This would reflect the emphasis in NPPF (section 4 on Promoting sustainable transport); ECC transport modelling and the planned 60:40 sustainable travel modes aim identified for Harlow, together with specific measures such as the sustainable transport corridors.

Change To Plan: ECC (Highways) recommends that wording is added in paragraph 4.13:

"... new communities will be able to have direct sustainable access to jobs ..."

Full Reference: C - 6880 - 8452 - Housing - None

CHAPTER: CONTEXT, VISION AND Prosperity
OBJECTIVES

6412 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Include provision for equestrians within the new Garden Communities so that the Plan is consistent throughout.

Change To Plan:

Full Reference: C - 6412 - 7887 - Prosperity - None

CHAPTER: CONTEXT, VISION AND Infrastructure
OBJECTIVES

6881 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This does not mention the improvements necessary to other transport networks (other than road and public transport networks).

Change To Plan: ECC (Highways) recommends that wording is added to paragraph 4.25 to read:

"Improvements will be made to the local highway network and to the public transport, footway and cycleway networks to improve connections within Harlow and to areas outside the district."

Full Reference: C - 6881 - 8452 - Infrastructure - None

831

6422 Object

Respondent: Mr Danny McCaughey [8578]

Agent: N/A

Summary: I object to the indicative new sustainable transport corridor linking to the garden communities.

This proposed link would cut a line directly through the green wedge disrupting local communities, businesses and residential areas including cycle tracks from Fern Lane right through to the town centre.

The town already has strong links and an easy route into the town centre .

This green wedge would also not benefit from the creation of new green wedges in other areas of the town.. This would simply destroy the land creating more pollution (including near two schools and cycle/walking tracks).

Change To Plan: Scrap this indicative link and recognise that the current transport links, services and routes are more then suitable for the local and general area. The addition of a new junction on the M11 and the improved roads around Kao Park and the link to the town centre are in excellent working order. It is also worth mentioning the main junction on the entry of the town from the A414 which flows very well.

Full Reference: O - 6422 - 8578 - Key Diagram - i, ii, iii, iv

6468 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of the Key Diagram presented at Figure 4.1, but would like to raise a specific objection in respect of:

- (i) the new east-west Green Wedge shown permeating through the East Harlow site;
- (ii) the New Allotment provision in the same location; and
- (iii) lack of any Indicative New Accesses for East Harlow to the north, in Epping Forest District.

Change To Plan: Our client respectfully requests that the Key Diagram is amended to show the following:
- an "Indicative Green Wedge" rather than a "Green Wedge" on-site at East Harlow; "Indicative New Allotments" rather than "New Allotment" on-site at East Harlow; and
- two additional "Indicative New Access for the East of Harlow Strategic Housing Site" on the East Harlow land in Epping Forest District, one near Mayfield Farm and the other from the new link road roundabout leading to M11 J7A.

Full Reference: O - 6468 - 5769 - Key Diagram - ii

6471 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client wishes to raise a holding objection to part (a) of Policy PL1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6471 - 5769 - 5. HARLOW AND GILSTON GARDEN TOWN - iii

6847 Object **Respondent: Miss Mary Wiltshire [6026]** **Agent: N/A**
Summary: Object garden town concept, as Harlow town already struggling with overloaded infrastructure.

Change To Plan: Any future consultation should show the Harlow residents how the costs would be shared

Full Reference: O - 6847 - 6026 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6657 Support **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Housing growth within the Harlow and Gilston area is in excess of 16,000 homes within the plan period. It is recognised that the delivery of the Gilston Garden Town is fundamental to achieving the Harlow Local Plan objectives, notably infrastructure and the regeneration and expansion of sustainable transport infrastructure such as the Sustainable Transport Corridors and green infrastructure proposals.

HCC has been continuously engaged with the Garden Town Group and encourages the continued relationship and engagement in the development process, this is supported by MOU's.

As Highway Authority, HCC support the Garden Town proposal due to the fundamental shift towards the use of sustainable travel, with an ambitious sustainable modal split target. This is reliant on transport infrastructure within Harlow, such as North/South and East/West sustainable transport corridors and increased connectivity for walking and cycling through improved green infrastructure.

HCC support the inclusion of active travel infrastructure within green infrastructure to enable good connections and permeability between Gilston and Harlow along the county border, which is stated in paragraph 10.15.

Change To Plan:

Full Reference: S - 6657 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6602 Comment **Respondent: East Herts District Council (Mr George Pavey) [8616]** **Agent: N/A**

Summary: It is noted that the policies in HGT1 are similar to those in the East Herts District Plan (Policy GA1) and reflect a set of values that the Harlow and Gilston Garden Town share. However, East Herts questions the legal basis for including policies that relate to development entirely outside of Harlow's administrative boundary.

Change To Plan:

Full Reference: C - 6602 - 8616 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6623 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Concern is also expressed over the identification of a number of new Garden Communities which will provide growth not just for Harlow, but for Epping Forest and East Hertfordshire.

Whilst Gladman do not object in principle to the identification of Garden Communities, considerable care should be exercised when establishing their deliverability and viability, especially in terms of the trajectory of housing delivery.

In addition, any new Garden Communities should form part of a package of sites which provide a wide range of sites, of varying sizes, in a variety of locations that can be delivered in the short to medium term to ensure that a rolling 5-year housing land supply can be maintained in line with Government guidance.

Issues surrounding the identification of large scale Garden Communities have been examined in some detail at the recent North Essex Local Plan Examination. It is suggested that the Council review the Inspector's Advice in relation to this Examination to ensure that the issues raised have been addressed through the HLDP.

The HLDP identifies that delivering an improved Junction 7 and a new Junction 7a on the M11 are critical to the delivery of growth within Harlow District. Significant infrastructure projects such as these should not be under-estimated and it is essential that the timeframes set for the delivery of these projects is realistic and the subsequent implications for housing delivery are appropriate.

Paragraph 5.11 of the HLDP states that the Harlow and Gilston Garden Town represents a major opportunity to deliver approximately 16,000 new dwellings up to 2033. This is a highly ambitious target, especially as the delivery of the scheme requires the delivery of Junction 7a on the M11 and the preparation of a strategic masterplan. These issues will have implications for the speed of housing delivery and this should be fully reflected in the subsequent housing trajectory.

Change To Plan:

Full Reference: C - 6623 - 8618 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6655 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Children's Services-Schools Planning

Hertfordshire County Council (HCC) notes the two strategic Garden Town Communities that are planned within the District, along with further communities located to the east in Epping Forest District and the Gilston Area to the north in East Herts District. The Gilston Area includes a total of 10,000 new dwellings within and beyond the current Plan Period. The development area sits solely within East Herts District and HCC would expect a development of this size to provide its own school infrastructure within the development itself. HCC's response to the East Herts District Plan Regulation 19 pre-submission consultation (December 2016) outlines the education requirements for the District, which can be viewed here:

http://consult.eastherts.gov.uk/common/search/advanced_search.jsp?id=482550&sortMode=response_date&lookingFor=representations&tab=list

We are working with both the District and developers on ensuring the delivery of sufficient and appropriate education infrastructure to meet the needs of those new communities. We welcome the design, development and phased delivery principles outlined within the Pre-Submission Local Plan and the need for continued joint working in order to deliver sustainable infrastructure provision.

Change To Plan:

Full Reference: C - 6655 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6665 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Minerals & Waste Planning

The Gilston development to the north of Harlow in East Herts District is proposed within the Mineral Safeguarding Areas and Consultation Areas in the Hertfordshire Minerals Local Plan in a location where it has the potential to affect mineral reserves. There is a need to ensure that potential and known mineral reserves are safeguarded from development which may 'sterilise' or prejudice the opportunity to extract them now or in the future. Where a proposed development has the potential to affect mineral reserves, appropriate consultation with the county council must take place and ways to avoid the unnecessary sterilisation of minerals should be demonstrated.

As the sand and gravel belt covers a significant area, the issue of mineral sterilisation could be an important consideration for the other strategic locations proposed in the Pre-submission Harlow Local Plan. However, this would be determined by Essex County Council as mineral planning authority for Essex.

Change To Plan:

Full Reference: C - 6665 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6670 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 5.2 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.

Change To Plan:

Full Reference: C - 6670 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6680 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Reference is made to the Harlow and Gilston Design Charter throughout the Plan. This underpins many of the policies. However, we understand that this document is not yet available to view. Without sight of this document it is not possible to say whether sufficient protection has been given to the historic environment in policy

Change To Plan:

Full Reference: C - 6680 - 8623 - 5. HARLOW AND GILSTON GARDEN TOWN - None

835

6754 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: The Pre-Submission Plan outlines that development of the Gilston Area should be "framed by the objectives set out in the Town and Country Planning Association's nine key guiding Garden City principles" (paragraph 5.14), one of which is that "new Garden Cities should aspire to a tenure split of 30% of homes being available for social rent [with] other forms of submarket housing, such as shared-equity and low-cost or discounted ownership forming a further 30% of homes". The term 'frame', suggests consideration of a much greater proportion of affordable homes than that proposed. For consistency, it is suggested that Paragraph 5.14 is updated to include the following:

"...framed by the objectives set out in the Town and Country Planning Association's nine key guiding Garden City principles but having regard to the local specific affordable housing requirements as set out in the Harlow Local Development Plan".

PfP support the principle that the costs of strategic infrastructure should be shared (as proposed by Policy HGT1(2.n). The mechanism for doing so should be specified and it should be noted that the share of the costs of the listed infrastructure to be borne by each development will need to be carefully assessed.

PfP are concerned that the plan refers to the requirement for four-tracking of the West Anglia Mainline. There has been no publication of evidence that supports the necessity of such provision within the plan period, even though it may be desirable. Given the uncertainties over deliverability it would not be appropriate to make such provision a requirement of the plan and PfP suggest this is removed. Supporting text can still refer to the desirability of such provision and that HDC along with others will work with the rail stakeholders to assist its delivery. Reference should also be made to the capacity enhancements that will come about due to new trains being introduced within the current franchise, and a more positive framework should be set for improvements around the station.

PfP will be sponsoring the applications for the Central and Eastern Stort Crossings and will if necessary be providing the funding to ensure their delivery in line with the agreed development triggers for the Gilston Area. However, the Crossings are required to meet existing demand and to accommodate the planned growth of Harlow and the wider area. In particular, the Central Crossing is required to meet existing need, and the Eastern Crossing is required to meet the need of future growth in the Harlow area as a whole. The IDP will need to be clear that the Crossings serve a strategic transport purpose and contributions are required from all new development.

In addition, the emerging EHDC District Plan notes that whilst the Eastern Crossing is the highway authorities preferred option for a new river crossing, a western option remains a possibility, and this should be clearly acknowledged within the HDC plan.

Change To Plan:

Full Reference: C - 6754 - 7958 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6764 Comment**Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]****Agent: N/A**

Summary: The Trust welcomes the cross-boundary support provided by Harlow, Epping and East Hertfordshire District Councils, pledging to work co-operatively to facilitate the optimum provision of high quality healthcare facilities to serve the wider area (as referenced in paragraphs 5.38 & 5.39 of the draft Local Plan).

As referred to in paragraph 5.38, the Trust shares the aspiration that its future location will maximise use of sustainable transport modes. However, it must be noted that there are myriad of economic, operational and land use considerations which also influence the final outcome and the availability of locations for a new hospital. It would not be right therefore that sustainability alone drives this judgement.

The Trust notes that text relating to its Strategic Outline Business Case (sections 5.38 & 5.39) are contained within Chapter 5: "Harlow & Gilston Garden Town". These references are suitable within this context, but the allocation of the existing site for housing, and absence of reference to support for the redevelopment option within the Development Management Policies, implies the relocation v's redevelopment options are not being given equal standing, which necessarily must be the case at this stage. However, once a firm option has been confirmed, the Trust would welcome a proposed change to the Plan to reflect the up to date position.

Change To Plan: In order to reflect the fact that redevelopment of the existing site is still an option which remains under detailed consideration, the Trust requests the inclusion of a masterplanning policy in the document. This would allow the Trust to be best placed to pursue whatever option would best meet the demand arising in the future, should it be decided that hospital relocation is not the optimal solution.

Full Reference: C - 6764 - 8532 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6771 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: The Plan acknowledges that highway and transport improvements are required (paragraph 5.32). These are to include "works to the Water Lane roundabout, A1025/Abercrombie Way signals and traffic calming along the A1169".

A large increase in the volume of traffic in the area is inevitable and we believe will mean unsustainable pressures on local roads. There is an assumption that traffic will travel through Harlow for onward journeys - so improvements are being made there and towards the M11 - but this is unrealistic

Change To Plan: We suggest that these minor measures will have minimal effect (and are at a loss to understand how traffic calming is intended to improve the situation)

inevitable that 'back roads' will be used. This in turn will result in congestion, not just along the B181 but on other roads through Roydon Parish particularly Epping Road (through Roydon Village), Tylers Cross/Hamlet Hill/Sedge Green and Dobbs Weir (towards Hertfordshire) as well as Common Road (towards Nazeing).

Full Reference: C - 6771 - 5434 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6772 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: Paragraph 5.16 states that the Councils' aspirations for sustainable transport include a "modal travel shift towards 60% by sustainable modes of transport". This a laudable aim but in our view is currently completely unrealistic. The 60% figure is an aspiration but should not be a serious basis for planning unless there is evidence that this is achievable. Alternative transport has not happened at other new developments in Harlow, to our knowledge, and the trend seems to be towards decreasing, rather than increasing, local bus services. We believe the Plan to be unsound in this respect.

Change To Plan:

Full Reference: C - 6772 - 5434 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6851 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: It is understood that the Design Charter and Spatial Vision are being developed by a design consultancy on behalf of the three authorities but is unlikely to undergo any public consultation. Policies HTG1 and HS3 require compliance with the strategic documents, however, it is understood these documents will not be published in advance of adoption of the Local Plan. It therefore is not possible to consider the potential implications of compliance with these documents upon viability of the development. Further, Paragraph 174 of the NPPF seeks the cumulative impacts of local standards to be assessed as part of the Council's evidence base to ensure the implementation of the plan is not at serious risk. No such evidence has been prepared.

Change To Plan: Policies HGT1 and HS3 are amended to remove reference to the need for development solely to reflect the overarching design principles of the Spatial Vision of Design Charter and instead include for flexibility for development to be brought forwards in advance or absence of the documents.

Full Reference: C - 6851 - 8640 - 5. HARLOW AND GILSTON GARDEN TOWN - None

837

6884 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Paragraph 5.27

ECC recommends removing reference in this paragraph to the number of FE. Plans should not refer to specific numbers of forms of entry as the precise need will depend on the, as yet unknown, unit mix of the development. The number of pupils using the schools will also change over time, with the need for bulge groups common in relation to new developments.

Change To Plan: ECC (Education) recommends that
Each allocation should specify:

- a) the area(s) of D1 use land included in it for school use to avoid the whole allocation being attributed residential land value and
- b) that the land given over for schools must meet the criteria set out in Essex County Council's 'Developer's Guide to Infrastructure Contributions'.

Full Reference: C - 6884 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6885 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Paragraph 5.27

This currently states:

'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, a two-form entry primary school and appropriate contributions (including the provision of land) towards a new secondary school.'

The Plan needs to instead reference:

Two primary schools will be required to serve 3,350 homes. Sites of 2.1ha & 2.9ha should be allocated.

The secondary school will require around 9ha of land.

ECC also wishes to highlight the need for further joint working and a statement of common ground to address cross-boundary education matters, applying in particular to this development but also more widely across Harlow, with regard to cross-boundary growth and new education provision for the Garden Town. Whilst it is important to ensure adequate and timely education provision, an element of flexibility in approach is also considered necessary around this.

Change To Plan: ECC (Education) recommends that (since the proposed wording appears to apply to the entire development across both local authorities) the wording of paragraph 5.27 is revised to reflect the full primary education requirement, as follows:

.....The development is required to provide community facilities including Early Years facilities, two primary schools and appropriate contributions (including the provision of land) towards a new secondary school.'

Provision of two sites of 2.1ha. and a site of approximately 9ha. will accordingly be allocated, all within use class D1

The latter point does not dictate any particular Local Plan content response but a reference in this paragraph may prove helpful for completeness of information and to ensure other interests are aware of this.

Full Reference: C - 6885 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6886 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: Paragraph 5.28
The Plan needs to instead reference:
Highway and transport improvements for the East of Harlow strategic site should include direct bus/walk/cycle access and linkage to/through Newhall site as part of Sustainable Transport Corridor improvements.

Paragraph 5.29
South of Harlow (Latton Priory)
This currently states:
Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new two-form entry primary school and appropriate contributions towards a secondary school to serve new development.....

The plan needs instead to refer to a 2.1ha primary school site and not to specify 2 forms of entry.

A new secondary school site is to be included in this allocation, as well as contributions, Around 9ha of land should be allocated.

Change To Plan: ECC (Highways) recommends that wording is added in paragraph 5.28 to include direct bus/walk/cycle access and linkage to/through Newhall site - as part of Sustainable Transport Corridor improvements.
ECC (Education) recommends that paragraph 5.29 is revised as follows:

Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new site (of 2.1 ha. in area) for a primary school, a site of approximately 9ha. of D1 land for a secondary school and appropriate contributions towards the secondary school to serve new development.....

Full Reference: C - 6886 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6887 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: ECC has identified an apparent inconsistency between the Harlow and EFDC Local Plans
Regarding employment land associated with Latton Priory, EFDC Local Plan (Submission Version) states at paragraph 5.169: "There is also an existing employment site that is allocated for a further 5,120sqm of B2/B8 class use (general industrial/storage and warehousing): RUR.E19 - Dorrington Farm, Rye Hill Road (1.85ha)"
This is at odds with both EFDC Local Plan table 3.1, and the HDC Local Plan text, which both state 1ha of B1a/B1b employment land will be provided at Dorrington Farm.

Change To Plan: ECC recommends checking to assess which position is most accurate and if necessary, revise the Local Plan text (at paragraph 5.30) accordingly.

Full Reference: C - 6887 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6888 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: The text does not mention where Latton Priory would gain access to the highway network. The stated preference of EFDC and site promoters is access onto Rye Hill Road (and other unsuitable local residential roads), which would result in impact on Southern Way. ECC recommends instead that the main site access should be off B1393 London Rd, with a link road through to Rye Hill Road, and with Rye Hill Road closed to general traffic south of the western access.

Change To Plan: This matter indicates the need for a constructive dialogue between ECC (Highways), HC, EFDC and the site promoters / developers. Depending on the outcome of that, this might require a revision adding to the current Local Plan text (paragraphs 5.29 - 5.31) and addressing through the Latton Priory masterplan process.

Full Reference: C - 6888 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6889 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: Although the Latton Priory development is located within EFDC district and addressed chiefly by that Local Plan, ECC advises that highway and transport improvements required for Latton Priory site should include direct linkage with north-south sustainable transport corridor.

Change To Plan: Revise (descriptive text of) paragraph 5.31 to state requirement for Latton Priory development to include direct linkage to the north-south sustainable transport corridor

Full Reference: C - 6889 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6890 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This currently states:

Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new two-form entry primary school and appropriate contributions towards a secondary school to serve new development.

The plan needs instead to refer to a 2.1ha primary school site and not to specify 2 forms of entry.

Change To Plan: ECC (Education) recommends that paragraph 5.29 is revised as follows:

Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new site (of 2.1 ha. in area) for a primary school and appropriate contributions towards a secondary school to serve new development.

Full Reference: C - 6890 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6432 Object

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: Policy HGT1 includes a number of projects and sites which are beyond the administrative boundaries of Harlow. In upper case policy terms, a Local Plan can only contain references to land use proposals which are within the area covered by the document. Any other elements should be included in lower case supporting text.

Change To Plan: The policy should be reduced in its coverage, to refer only to spatial policies and land use proposals which are within the administrative area of Harlow District.

Full Reference: O - 6432 - 8588 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - i, iii

6470 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of Policy HGT1 and particularly part 1(c) which seeks to deliver approximately 3,350 dwellings at East of Harlow. However, our client objects to the following criteria in Policy HGT1: 2(c) in relation to the timing of a supporting statement setting out long-term governance and stewardship arrangements for the community assets on-site; 2(d) pending publication and review of the completed Spatial Vision and Design Charter; 2(k) regarding the need for Garden Town-wide parking standards; and, 2(m) in relation to addressing climate change through construction methods.

Change To Plan: Our client respectfully requests that Policy HGT1 is amended as follows:

- Part 2(c) to be revised to read "Prior to the commencement of development, developers must submit a supporting statement..." instead of "Prior to the submission of outline planning applications, developers must submit a supporting statement..."
- Part 2(d) is subject to a holding objection, pending publication and review of the completed Spatial Vision and Design Charter.
- Part 2(k) to be revised to read "Develop specific Garden Town-wide parking standards which recognise that car ownership will need to be accommodated without impacting the quality place whilst making the best use of land and which have been subject to a formal period of public consultation.
- Part 2(m) delete reference to "and construction methods".

Full Reference: O - 6470 - 5769 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - ii, iii

6691 Object

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: 2c suggest the addition of heritage assets in the list of stewardship arrangements

2d At the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy. In the absence of this, we must conclude that the Policy is unsound. We would suggest that an additional bullet point is added to Policy HGT1, part 2 to read 'Conserve and where appropriate enhance the historic environment'.

Change To Plan:

Full Reference: O - 6691 - 8623 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6770 Object

Respondent: Roydon Parish Council (Janet Ballard) [5434]

Agent: N/A

Summary: Policy HGT1, page 38, sets out proposals for Garden Town Communities. The proposals for West of Harlow (Water Lane Area) will have a major impact on the village of Roydon. This area is predominantly located in Roydon Parish and will result in the Parish having a disproportionate number of new homes (2,100) when compared with other urban extensions, especially considering the area's proximity to the settlements of Roydon and Broadley Common.

Change To Plan:

Full Reference: O - 6770 - 5434 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6569 Support**Respondent: Canal & River Trust (Ms Tessa Craig) [8612]****Agent: N/A**

Summary: The Trust supports stakeholder involvement in the design and delivery of the Garden Towns and would consider itself to be a key consultee for the Garden Towns, particularly Gilston due to its proximity to the River Stort. The Trust considers towpath improvements (as a Sustainable Transport Corridor) necessary to meet the needs of residents (existing and future) to support sustainable travel.

The development of a significant number of new homes at Gilston Garden Town to the north of the River Stort Navigation and improved access to the River Stort means it is highly likely there will be an increase in the usage of the towpath for recreational and possibly commuting purposes the impact of which we would wish to see mitigated through the appropriate use of planning obligation or other suitable mechanisms. We therefore note and welcome reference in Policy HG1 to a funding mechanism for future stewardship, management, maintenance and renewal of community infrastructure and assets and the need for developers to set out a sustainable long term arrangement for governance and stewardship arrangement for community assets including green infrastructure

Point 5.36 of the policy justification identifies a widened Central Stort Crossing and a Second Stort Crossing. The Trust has provided pre-application advice on these proposed crossings and in that advice, referred to the HS2 Design Principles for Bridge Crossings and the Code of Practice for Works Affecting the Canal & River Trust. Whilst the Trust has no objection in principle to the proposed crossings it has raised a number of concerns in relation to the alignment of the Eastern Crossing and detailed design and would wish to be consulted further in respect of the detailed design of any proposed works

The Trust welcomes policy point HGT1(m) on mitigation from and adaption to climate change through design and construction. Our waterways can play a part in such mitigation through, for example, use for heating and cooling of development and surface water drainage where appropriate.

Change To Plan:

Full Reference: S - 6569 - 8612 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

842

6690 Support**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: Welcome strategic Objective 2 and reference to protecting and enhancing the district's historic environment.

Change To Plan:

Full Reference: S - 6690 - 8623 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6788 Support**Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]****Agent: N/A**

Summary: Support the proposed strategic allocations at Harlow in the form of the new Garden Town Communities and in particular the allocation of Latton Priory, although the policies relating to these allocations would benefit from further refinement and clarification to ensure they are effective. We recommend that Harlow District Council aligns its draft policy HGT1 with Epping Forest District Council's draft policy SP4 to maintain consistency in the principles for the Garden Town Communities in the Harlow and Gilston Garden Town.

Change To Plan:

Full Reference: S - 6788 - 7646 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6827 Support**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: Policy HGT1 covers the development and delivery of the Garden Town Communities. EFDC strongly support the identification of Latton Priory, Water Lane Area and East of Harlow sites within Epping Forest District as Garden Town Communities. However, it is suggested that it would be more appropriate to refer to sites that are not within the Harlow District boundary in the supporting text of the policy and therefore focus the policy on the approach to the development and delivery of the Garden Town Communities and sites within Harlow District. Policy HGT1 provides a commitment for Strategic Masterplans to become Supplementary Planning Documents (SPDs). EFDC note that the Epping Forest District Local Plan Submission Version 2017 only requires Strategic Masterplans to be capable of adoption as SPDs in order to ensure flexibility when implementing the most sustainable strategy for the Garden Town Communities in Epping Forest District. It is also suggested that, in the interests of effectiveness, the Plan makes it clear that, notwithstanding the fact that the East of Harlow site as a whole lies within two local authority areas, a single Masterplan (to be agreed by both local authorities) should be produced to ensure the site in its entirety is developed as one community. This would help to ensure that a fully integrated community is delivered. This comment is also relevant to the comments made below on Policy HS3. EFDC welcome reference to the Garden Town Spatial Vision and Design Charter and the independent Quality Review Panel in the policy. EFDC fully supports the ambition of achieving 60% modal shift and the inclusion of subsection k) of Policy HGT1 with regard to the development of specific parking standards and that paragraph 17.5 identifies that parking provision may be reduced in sustainable locations.

Change To Plan:

Full Reference: S - 6827 - 8637 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6413 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Page 39 Policy HGT1 point (l): this paragraph relates to Green Infrastructure and it does not include any provision for it being fully accessible by all users. To make this Plan sound, we suggest that this paragraph is reworded thus: 'Create distinctive, fully accessible environments which relate to the surrounding area...'

Change To Plan:

Full Reference: C - 6413 - 7887 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6453 Comment**Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]****Agent: N/A**

Summary: I welcome the requirement under HGT1 that community services and facilities be accessible for all residents (2 (j)). Would this be befitted by spelling out that such access should be available on foot. The Harlow principle of everyone within a few minutes walk of a pint of milk provides a good model.

Change To Plan:

Full Reference: C - 6453 - 8586 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6671 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town. The wording within paragraph 2(i) in this policy does not conflict with HCC's LTP. As some of the linkages referred to (ie those to the proposed Gilston development) would cross the Essex/Herts county boundary, joined up working would be required to achieve comprehensive and worthwhile links.

Change To Plan:

Full Reference: C - 6671 - 8622 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

843

6677 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: The pre-submission local plan proposes an additional 6,500 dwellings within the plan area, along with an additional 750 dwellings allocated within neighbouring Epping Forest District and a total of 10,000 dwellings in the Gilston Area to the north of Harlow in East Herts District. This significant increase in population requires additional capacity to be added to the existing recycling centre network (known as Household Waste Recycling Centres (HWRC) in Hertfordshire) in both Harlow and East Herts District.

The pre-submission plan does not mention the need to increase the current HWRC capacity, which is considered to be an important service provision which should be integrally planned from the outset of these new growth areas coming forward.

Options for delivering the additional capacity required include developing or upgrading two separate facilities that would serve the proposed housing growth in Harlow and the Gilston development in East Herts District, or a combined facility that serves both of these developments. Work is ongoing to consider the appropriateness and suitability of this option.

Whilst it is recognised that Essex County Council is the relevant minerals and waste planning authority, covering the Harlow local plan area, waste management uses should still be reflected in the Pre-Submission Harlow Local Plan. It is therefore considered that in the light of the need to increase HWRC capacity within this area, the following wording should be inserted into Policy HGT1: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town, in order to reflect this:

"Essex County Council and Hertfordshire County Council will work collaboratively to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves the new communities that are planned in Harlow and the Gilston 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 area of the new communities."

Change To Plan: the following wording should be inserted into Policy HGT1: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town, in order to reflect this:

"Essex County Council and Hertfordshire County Council will work collaboratively to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves the new communities that are planned in Harlow and the Gilston 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 area of the new communities."

Full Reference: C - 6677 - 8622 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6730 Comment**Respondent: Natural England (Ms Sarah Fraser) [8628]****Agent: N/A**

Summary: This policy sets out the strategic sites allocated in the Local Plan. Whilst there is much we support in the policy, notably references to Green Infrastructure and biodiversity under (c) and (l) Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA'). Since this policy needs to be informed by the conclusions of the updated HRA and may require further amendment we cannot, at this time, advise that this policy is sound. Our concerns will be set out in more detail below. Also we would recommend that given the scale of development proposed there should be a policy commitment to ensuring development deliver net gains for biodiversity and the environment.

Housing allocations should also consider potential impacts on Harlow Woods Site of Special Scientific Interest ('SSSI') which may be impacted in combination with allocations near Harlow from neighbouring Local Plans. A strategic solution is also being prepared for Hatfield Forest SSSI. Initial visitor surveys imply that the catchment is likely to be relatively large and may include parts of Harlow District. The plan needs to ensure that such impacts are considered appropriately through the plan and Sustainability Appraisal ('SA') and that solutions are provided for in policy.

Change To Plan:

Full Reference: C - 6730 - 8628 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6753 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Policy HGT1 intends to provide a framework to ensure a consistent approach to the consideration of development proposals in Harlow, as well as those development proposals within the Garden Town in EHDC and EFDC. However, proposals such as GPE that fall in another administrative boundary will not be determined under Policy HGT1 but will be guided by the relevant planning policy within the appropriate district e.g. in respect of GPE Policy GA1 of the EHDC District Plan. Policy HGT1 should therefore be amended to make clear that the requirements of the policy do not apply to all four strategic Garden Town Communities, and instead only apply to proposals that fall within the administrative boundary of Harlow. This is not to say that we do not support these objectives, but that they should instead be delivered through co-operation under the Garden Town governance arrangements, and through planning decisions in each of the three Districts. It is not appropriate to include this in policy HGT1 as it cannot be enforced and will fail to meet the soundness test of 'Effectiveness'.

Policy HGT1 (2i) intends to "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 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". In order to do this, Harlow indicates an aspiration of a modal travel shift towards 60% by sustainable transport modes.

PfP supports the aspiration towards more sustainable transport modes and is working with HDC, EFDC, EHDC and ECC on the HIF bid to help enable the early delivery of the crossings which are needed to deliver the Sustainable Transport Corridor (STC). However further detail is needed from Harlow to demonstrate how the STC will be delivered and the 60% modal shift target achieved. For example, how will appropriate contributions to be secured from all new development and what positive measures will HDC put in place to encourage existing residents (as well as residents from future development) to use sustainable transport modes.

The policy should also recognise that the introduction of improved public transport corridors may require a balance to be drawn between the benefits of changing modes of travel and existing green spaces and landscaping.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6753 - 7958 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6882 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC has concerns that the expression of HGT1 suggests a fragmentation of approach towards the GT. This refers to four 'Garden Communities', instead of one collective and cohesive 'GT' - as was the case previously. This comment is in line with ECC's comments in response to the EFDC Submission Version Local Plan.,

Change To Plan: ECC is reviewing the potential for how current wording and approach used for both the HC and EFDC Local Plans might be revised in order to ensure the integrity and cohesion of the GT as a whole is maintained and suggests a discussion with the two district councils accordingly in order to resolve whether an agreed solution is achievable. This discussion is needed before submission stage in order to shape Statement(s) of Common Ground.

Full Reference: C - 6882 - 8452 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR THE

HGT1 Justification

6438 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: In paragraph 5.11 and elsewhere in the Local Plan, there is reference to a dwelling total of 16,000 units in the plan period to 2033. There is scant consideration to what happens beyond that point. In East Hertfordshire, in the so-called Gilston Area, the District Plan provides for 3,000 dwellings in the plan period and an additional 7,000 units beyond 2033. The cumulative impact of these developments on the whole area, in particular the transport system, water and drainage capacity, has not been fully considered.

Change To Plan:

Full Reference: C - 6438 - 8588 - HGT1 Justification - None

845

6472 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client wishes to raise a holding objection to paragraph 5.16 and to reserve the right to raise further comments or objections at Examination in Public, once the final Sustainable Transport Corridor Study has been published.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6472 - 5769 - HGT1 Implementation - iii

6473 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client would welcome further clarification, prior to EiP, as to the scope of the Garden Town Programme's remit. Although it is appropriate to seek to a coordinated approach and consistent placemaking objectives across the Garden Town, this should not involve an overarching delivery programme which could otherwise delay the delivery of some strategic sites and stall housing delivery in the early parts of the Plan period. Until such clarification is forthcoming, our client would like to raise a holding objection to paragraph 5.20.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6473 - 5769 - HGT1 Implementation - iii

6474 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client objects to the timing of a supporting statement setting out long-term governance and stewardship arrangements for the community assets on-site.
Change To Plan: Our client respectfully requests that paragraph 5.23 is amended to read "... prior to the commencement of development ..." instead of "... prior to outline planning permission..."

Full Reference: O - 6474 - 5769 - HGT1 Implementation - ii

6475 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: In order to reflect the current options available to the PAH Trust, paragraph 5.39 should be expanded to refer to the possibility of the hospital redeveloping its existing site.
Change To Plan: Our client respectfully requests that the following is added to the end of paragraph 5.39: "... Alternatively the Princess Alexandra Hospital may decide to remain at its existing site and redevelop new hospital facilities in-situ."

Full Reference: O - 6475 - 5769 - HGT1 Implementation - ii

6692 Object**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: We note the reference to the TCPA guiding garden city principles. It is important to highlight that whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the historic environment. It is therefore unclear how the TCPA principles can be reconciled with the NPPF's definition of sustainable development in terms of its environmental strand which requires the conservation and enhancement of the historic environment. Whilst the TCPA Garden Cities Principles are silent on the historic environment, their 2017 publication "The Art of Building a Garden City" does provide a further level of detail, particularly with regards to the siting of new settlements. This publication states that, "locations for new garden cities should not only avoid damaging areas that are protected for their ecological, landscape, historic or climate-resilience value but should actively be located in areas where there can be a positive impact on these assets. Underpinning the consideration of sites for new garden cities or towns should be the extent to which each one . . . will allow for positive impacts on assets of historic value". (Emphasis added, pg 100) In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment in line with the NPPF.

Change To Plan:

Full Reference: O - 6692 - 8623 - HGT1 Implementation - None

6414 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Page 41 para 5.18: this paragraph mentions joint working with both public and private stakeholders in the planning and delivery of these new Garden Communities, and we would wish it noted that both Essex Bridleways Association and the British Horse Society are keen to have an input at the masterplanning stage of these new communities. The test of soundness of the Plan will include the provision for such consultation with stakeholders and the inclusion of representatives from all user groups - equestrian, cycling, pedestrians and the disabled - will meet the soundness requirements. Paragraph 5.23 also is relevant here.

Change To Plan:

Full Reference: C - 6414 - 7887 - HGT1 Implementation - None

6415 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Page 42 para 5.25: we fully support the aspiration to maintain the connection of Harlow's existing Green Infrastructure, including footpaths, cycleways and bridleways; however, this aspiration needs to be embedded within all sections of the Plan and not just in selected areas. To be sound, this Plan needs to be consistent throughout therefore the need to include all user groups within it is required.

Change To Plan:

Full Reference: C - 6415 - 7887 - HGT1 Implementation - None

6416 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Page 44 para 5.28: we note the intention to provide 'linkages into walking and off-road cycle networks'. To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'linkages into walking and off-road cycle and equestrian networks'.

Change To Plan:

Full Reference: C - 6416 - 7887 - HGT1 Implementation - None

847

6417 Comment Respondent: **Essex Bridleways Association (Mrs Sue Dobson) [7887]** Agent: **N/A**
Summary: Page 44 para 5.29: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
Change To Plan:

Full Reference: C - 6417 - 7887 - HGT1 Implementation - None

6418 Comment Respondent: **Essex Bridleways Association (Mrs Sue Dobson) [7887]** Agent: **N/A**
Summary: Page 44 para 5.32: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
Change To Plan:

Full Reference: C - 6418 - 7887 - HGT1 Implementation - None

6419 Comment Respondent: **Essex Bridleways Association (Mrs Sue Dobson) [7887]** Agent: **N/A**
Summary: Page 44 para 5.35: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
Change To Plan:

Full Reference: C - 6419 - 7887 - HGT1 Implementation - None

6439 Comment Respondent: **STOP Harlow North [8588]** Agent: **Mr Jed Griffiths [8576]**
Summary: The delivery of the Local Plan is too dependent on external factors and the successful co-operation between the public and private sectors. There are too few certainties in the provision of infrastructure. Long term drainage capacity is too dependent on the Rye Meads Waste Water Treatment Plant, which is adjacent to a designated wildlife site of European importance.
Change To Plan:

848

Full Reference: C - 6439 - 8588 - HGT1 Implementation - None

6672 Comment Respondent: **Hertfordshire County Council (Mr Martin Wells) [8622]** Agent: **N/A**
Summary: Paragraph 5.22. HCC would welcome inclusion in any consultation on Plans covering areas on, or around the county boundary.
Paragraph 5.36. It is assumed that HCC would be involved in any study, as mentioned within this paragraph.
Change To Plan:

Full Reference: C - 6672 - 8622 - HGT1 Implementation - None

6883 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises the benefits to the Plan of reflecting the TCPA work on Garden Communities, including its Reuniting Planning and Health work and guidance. The Garden Town (long term transformational growth) presents an opportunity to promote healthier populations and lifestyles and embed improved wellbeing, working with GT partners, taking advantage of wider cross boundary growth and the existing assets of the Harlow area (e.g. greenspace provision, off road networks and River Stort valley).

This is also important to ensure that health and well-being issues are taken into account fully when considering the future design and delivery of the Garden Town growth.

Change To Plan: ECC recommends early joint work, prior to Local Plan submission, on a positive and collaborative basis to review the learning from the guidance mentioned and to jointly develop and agree appropriate Plan content and responses to integrate health and well-being fully within the Garden Town part of the Local Plan (and other parts). This could shape any SoCG(s) to resolve this matter.

Full Reference: C - 6883 - 8452 - HGT1 Implementation - None

CHAPTER: STRATEGIC GROWTH SD1 Presumption in Favour of Sustainable Development
STRATEGY FOR HARLOW

6476 Object**Respondent: Miller Strategic Land [5769]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: In order to be consistent with national policy (particularly paragraph 14 in the National Planning Policy Framework (NPPF)), the second paragraph in Policy SD1 should recognise that development also will normally be supported "where relevant policies are out-of-date".

Change To Plan: The second paragraph in Policy SD1 should be amended to read:
"Where there are no policies specifically relevant to the proposed development or relevant policies are out-of-date, development will normally be supported, unless..."

Full Reference: O - 6476 - 5769 - SD1 Presumption in Favour of Sustainable Development - iv

849

6624 Support**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman support Policy SD1 in that it reflects clearly the key aim of the Framework to deliver sustainable development.

Change To Plan:

Full Reference: S - 6624 - 8618 - SD1 Presumption in Favour of Sustainable Development - None

6653 Comment

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: There is no doubt that more and new homes are required to meet the needs of Harlow's existing residents and those that will need to live in the town as new employment opportunities arise in the future. There is already enough evidence to show that for many the new homes being constructed are beyond the means of those living locally who are most in need of a home. The Harlow Alliance Party believe that Harlow Council must play a pivotal role in providing homes which local people can afford to live in and not live a life on Housing Benefit. It should give a commitment to provide council homes at council rent levels on any public land used in the future for new housing.

Change To Plan:

Full Reference: C - 6653 - 8621 - 7. HOUSING STRATEGY AND GROWTH LOCATIONS - None

6656 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: HCC as Highway Authority have engaged throughout the Local Plan as demonstrated through the MoU for transport, and support the evidence baseresulting from the joint work. The modelling work conducted by Essex County Council using the VISUM transport model has been shared with HCC. The VISUM transport modelling work has demonstrated that private vehicle trips from both new and existing development in the Harlow area need to be reduced to avoid unacceptable impacts on the M11 junction 7a corridor. Further VISUM testing has been undertaken to identify the levels of mode shift required to enable acceptable network operation and growth beyond 3,000 dwellings at Gilston. The conclusion to this work was that an ambitious target of 60% sustainable mode share from new developments is required to enable development of 10,000 homes at Gilston (along with the provision of associated transport measures such as a 2nd Stort Crossing and other highway upgrades). HCC have a countywide model COMET. A Local plan forecast run (2031) has been developed to look at the implications of Local Plan growth across Hertfordshire (including 3,000 dwellings at Gilston) and also includes local plan growth in the wider Harlow, Epping and Uttlesford areas. The developments have been tested with standard mode share / trip generation assumptions. The modelling work assumes that junction 7a will be in place along with the 2nd Stort Crossing, improvements to the Central Stort crossing and upgrades to the A414 junctions in Harlow and M11 junction 7. It is difficult to identify the specific impact of Local Plan growth in Harlow but the model results indicate the potential for a significant increase in delay (extra 3-5 minutes) at the Eastwick junction and the risk of diversion of traffic onto less suitable routes in the area. We also have concerns over the increases in traffic evident on the A414 corridor through Hertford and the A10 corridor through southern Broxbourne. This evidence supports the need for a significant shift in travel mode from the car to more sustainable modes of travel.

Change To Plan:

Full Reference: C - 6656 - 8622 - 7. HOUSING STRATEGY AND GROWTH LOCATIONS - None

6647 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: The Plan is full of assumptions and conclusions without any meaningful evidence, using information which becomes out of date almost as it is written and with little if any widespread consultation with the most important people of all, the residents of Harlow. This Plan, which is clearly only supported by one of the political parties in Harlow, should not be used as a basis for the long-term planning of the future of Harlow. Assumptions about housing need for the Harlow area are made without giving any evidence of this need. Restrictions on who can apply for Council homes in Harlow and neighbouring authorities mean that they cannot give accurate evidence of housing need in the area. The Plan makes assumptions about the number of homes needed to support the regeneration of Harlow's Town Centre. Similar claims were made in the 1980's and 1990's, since when thousands of homes have been built in the area but little or no regeneration has taken place. The rapid increase in the population of London is fuelling the need for building homes locally but this may well not continue in future years, indeed the most recent information available shows a net decline in those living in London and the effect of Brexit is predicted to see this decline continue. Many other assumptions have been made without any actual evidence and the almost total lack of resident involvement in gathering evidence during the process leading to this Plan should be of very great concern.

Change To Plan:

Full Reference: O - 6647 - 8621 - HS1 Housing Delivery - None

6702 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is not sound as it is not justified or consistent with national policy. Paragraph 7.6 states that the Council must ensure that there is sufficient supply to meet Harlow's objectively assessed housing need of 7,400 dwellings. As we have set out above we do not consider this to be based on a sound evidence base and the Council's housing requirement should reflect this position. However it must be recognised that compared to the other Boroughs in the HMA Harlow is constrained by the tight boundary which broadly reflects its urban area. This will inevitably limit its ability to deliver further new development. If the Council is not able to allocate further sites to meet this level of housing need it will be necessary for the other authorities in the HMA, who have sought to rely on Harlow to meet their own needs, to come forward with further development opportunities.

Change To Plan: Given that development opportunities within Harlow are more limited due to its tightly drawn boundary we would suggest that the Council work with its partners in the HMA to identify additional allocations across the other three authorities to ensure that housing needs are met in full.

Full Reference: O - 6702 - 8450 - HS1 Housing Delivery - None

6731 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy. This policy sets out the quanta of housing that will be allocated by the Local Plan. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA') we cannot, at this time, advise that this policy is sound until the updated HRA has been produced. Our concerns will be set out in more detail below. We also recommend that there should be a policy commitment to ensuring development deliver net gains for biodiversity and the environment.

Change To Plan:

Full Reference: O - 6731 - 8628 - HS1 Housing Delivery - None

6477 Support

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the provision in Policy HS1 of at least 9,200 dwellings in Harlow District during the 2011-2033 plan period (i.e. 418 dwellings per annum).

Change To Plan:

Full Reference: S - 6477 - 5769 - HS1 Housing Delivery - None

6824 Support**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: The Plan provides for 9,200 dwellings over the plan period with 30% affordable housing equating to 3,400 affordable homes. This is in line with the figures included in the signed MoU on Establishing the OAHN of the Housing Market Area. EFDC therefore welcome the commitment in the Pre-Submission Plan to meet the identified level of housing for Harlow in the Local Plan.

Change To Plan:

Full Reference: S - 6824 - 8637 - HS1 Housing Delivery - None

6625 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman has considerable concerns that across the Housing Market Area, fewer dwellings are proposed to be delivered than the latest ONS projections based on highway capacity.

The HMA as a whole has substantial issues with worsening affordability and significant population growth. It should therefore not be considered appropriate to deliver less housing than the ONS projections suggest as this will only exacerbate the problems and will not address the Government's fundamental objective of tackling the housing crisis.

Gladman consider that given the recent deliverability issues faced by the Council, it is entirely appropriate to apply a 20% buffer to the 5-year housing land supply calculation

Change To Plan:

Full Reference: C - 6625 - 8618 - HS1 Housing Delivery - None

6743 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: We also share the HBF's concerns that by under estimating the housing needs for each local authority the OAN for the HMA will not be met in full as required by paragraph 47 of the NPPF. This should be rectified.

Change To Plan:

Full Reference: C - 6743 - 8437 - HS1 Housing Delivery - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR HARLOW

HS1 Justification

6442 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: The assumptions made in the SHMA do not reflect the more recent ONS forecasts of a downturn in in-migration to the UK, which imply that the housing projections will have to be adjusted. SHN has raised its concerns at the East Herts District Plan Examination about the limited capacity of the Harlow area to accept large scale housing development. It is noted that the District Council's consultants have advised (in paragraph 7.22) that the upper limit of development across the HMA would be 51,100 dwellings. A higher level of development would exceed the capacity of the highways network.

Change To Plan:

Full Reference: C - 6442 - 8588 - HS1 Justification - None

852

6651 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: It seems that Harlow Council dismisses the fact that windfall sites have occurred since the last plan was put together and that they will continue to be created in the future. Every new home created means another family wanting to use public services, roads, water, doctor's surgeries etc etc. In the last two years or so some 800 homes have been created by the conversion of offices to flats. Since this Plan was completed a developer has been granted permission to build an extra 30 or so homes on a site where a previous permission had been given and other plans in the pipeline, not mentioned in the plan are likely to see over 500 homes created within the next five years.

Change To Plan:

Full Reference: O - 6651 - 8621 - HS1 Implementation - None

6443 Comment

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: The Local Plan (in paragraphs 7.28 - 7.30) is dismissive of the role of windfall sites in their contribution to housing supply. Other Local Plans in the HMA do provide for a contribution from windfall sites. It is suggested that an allowance of 5% would be realistic.

Change To Plan:

Full Reference: C - 6443 - 8588 - HS1 Implementation - None

6391 Object **Respondent: Mrs Samantha Baldry [8554]** **Agent: N/A**

Summary: I object to the proposed allocation of the Fennells Field for residential development due to:
Destruction of currently used green space for recreation.
This has been used for over 20 years for recreation and I can support this with photographic evidence. It is essential for the 156 families already living here.
Parking issues. Already beyond capacity!
Increased traffic flow causing danger.
The impediment of my 'Right to Light'
Depreciation of value to my property
Negative impact on the natural environment
Distress during construction works due to proximity to my property

Change To Plan: Site should be removed as a proposed allocation.

Full Reference: O - 6391 - 8554 - HS2 Housing Allocations - i, ii, iii, iv

6396 Object **Respondent: Mr Ethan Baldry [8559]** **Agent: N/A**

Summary: I would like to object to the Fennells Field being an allocated residential site. I have lived at this address since I was born and this green space has been an integral part of my childhood. I have used this along with my family and friends for recreation extensively throughout all seasons. I have enjoyed family games of football and rounders, played nerf guns with my friends, had picnics, birthday celebrations and built snowman and sledged down the hill. This open space should remain for the enjoyment of present and future children in this community.

Change To Plan: The Fennells field should not been an allocated site for residential housing. The green space should remain for the use of the community for recreation as it has been for many years.

Full Reference: O - 6396 - 8559 - HS2 Housing Allocations - i, ii, iii, iv

85

6397 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**

Summary: I would like to object to the Fennells Field being allocated as a residential site. I have lived at this address all of my life and the field has been a massive part of my life. I have played with friends, played with pets, made movies and enjoyed learning about the countryside by playing on the field. I have built snowmen, sledged and chased my brother around playing games. I have even had my birthday parties on the field too! I really want you to reconsider taking this away from me and my friends.

Change To Plan: Please remove this proposal from your document. Its not right and should be left for children to play on.

Full Reference: O - 6397 - 8560 - HS2 Housing Allocations - i, ii, iii, iv

6410 Object **Respondent: Mr Mike Stokes [8551]** **Agent: N/A**

Summary: Objection to Land east of 144 - 154 Fennells (Nature Reserve). Main objection is parking, the Fennells most evenings is crammed with cars, at weekends and special occasions the traffic bottle necks with the crematorium and church parking on occasions it is a complete stand still. My second objection is the playing field has been used by my children (154 Fennells) and now my grandchildren (144 Fennells) and by many residents for many years. If these changes have to happen please make sure the roads are right or there will be funerals delayed due to traffic problems.

Change To Plan: Do not build on the land east of the Fennells.

Full Reference: O - 6410 - 8551 - HS2 Housing Allocations - None

6437 Object**Respondent: Mrs Sarah Gibbins [8582]****Agent: N/A**

Summary: We wish to oppose any plans for potential building. As a young family we chose to live here due to the quietness and safeness of this area which we want to bring our children up in. Why do you feel it necessary to ruin a popular space if you talk highly of Gibberds original plan? So many people, including ourselves use the field for different reasons such as dog walking, children playing, family events, children's parties. The negative impact on the natural environment which currently supports wildlife in our area worries us, our little girl amongst many others enjoy this

Change To Plan: We feel it necessary that the council should consider removing the potential plans to build housing particularly in the area marked land east of 144-154 Fennells.

Full Reference: O - 6437 - 8582 - HS2 Housing Allocations - i

6441 Object**Respondent: Mr Dean Burns [8552]****Agent: N/A**

Summary: HS2/9 LAND EAST OF 144 154 FENNELLS
I TOTALLY OBJECT TO THIS SMALL PARCEL OF LAND IN AN AREA OF LOCAL NATURAL BEAUTY BEING DEVELOPED. THIS LAND WOULD NEED TO BE ACCESSED OF OF THE ROAD LEADING INTO THE CREMATORIUM AND NATURE RESERVE CAUSING MAJOR TRAFFIC/PARKING PROBLEMS IN ADDITION TO THOSE ALREADY CREATED. IN ADDITION, EXISTING HEDGEROWS WOULD NEED TO BE REMOVED TO ACCESS THE AREA DISRUPTING LOCAL BIODIVERSITY. AS A RESIDENT, WE HAVE ALREADY HAD THE RIDICULOUS EARTH BUND BUILT CAUSING MAJOR OPPORTUNITY FOR ANTI SOCIAL BEHAVIOUR. WE WOULD SEE OUR PROPERTY VALUES PLUMMET

Change To Plan: TOTALLY REMOVED FROM THE PROPOSAL

Full Reference: O - 6441 - 8552 - HS2 Housing Allocations - ii

6581 Object**Respondent: Ms Christina Webb [8613]****Agent: N/A**

Summary: Object to the proposed site at Radburn Close as a possible proposal for 36 dwellings.
Harlow consists of many unused derelict land areas and this land is used by the community on a daily basis.

the reason I chose this home was to have the pleasure of looking from my windows to cherish and admire the green space

aware of is the potential flood risks will now increase

what about the local infrastructure and the impact here. Parking in the local area is at its highest I have ever seen it. Damage has already been caused to green verge, pavements and fencing by car owners trying to find a space, there is no more room for extra , Radburn is full !

Change To Plan:

Full Reference: O - 6581 - 8613 - HS2 Housing Allocations - None

6600 Object

Respondent: Mr David Beavis [8615]

Agent: N/A

Summary: OBJECTION TO BUILDING ON SITE HS2-5 (relating to 10.1 & 10.2)
Paragraph 10.1 acknowledges that it's important to retain and enhance the natural environment for the enjoyment of residents and visitors. If building on the Plot HS2-5 is allowed, it would show a complete disregard for paragraph 10.1

In addition it would be completely contrary to the stated aim of Paragraph 10.2 which states that new developments MUST continue to implement the natural environment principles established by Sir Frederick Gibberd.

The Playing Field identified as HS2-5 is at a substantially higher ground level than the houses in Radburn Close that directly adjoin the field. This could have consequences of which I have serious concerns.

(1) FLOOD RISK (2) OVERSHADOWING(3) LOSS OF PRIVACY (4)INFRINGEMENT OF HUMAN RIGHTS

Additionally, Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

Change To Plan:

Full Reference: O - 6600 - 8615 - HS2 Housing Allocations - None

Summary: We note the allocations are simply listed in tabular form and marked on the proposals map. Particularly for the larger sites, (sites 1-8) we would expect to see more detail regarding the sites and policy criteria to indicate how the decision maker should react (para 154 and 157 of the NPPF). We suggest that individual policies be included for these sites. We outline below the key heritage assets likely to be affected by development of these sites, any further evidence required and suggested policy wording.

HS2- 1 Princess Alexandra Hospital- This site includes a listed building- Parndon Hall (grade 11) and a scheduled monument (bowl barrow). There are two further bowl barrows close to the site. Development of this site has the potential to impact upon these heritage assets and/or their settings. Any redevelopment of this site will need to conserve and enhance these heritage assets and their settings. This requirement should be included as a criterion in the policy and the supporting text.

HS2- 2 The Stow Service Bays- The Marks Tey Conservation Area lies to the north of this site. Any development of the site may impact upon the setting of the Conservation Area. The policy should indicate that any development of the site will need to preserve or where opportunities arise enhance the setting of the conservation area. This requirement should be included in the policy and the supporting text.

HS2 - 3 Land east of Katherine's Way, west of Deer Park There are no designated heritage assets within or close to the site. Historic England has no comments to make.

HS2 - 4 Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery- There are no designated heritage assets within or close to the site. Historic England has no comments to make.

HS2- 5 South of Clifton Hatch- Whilst there are no designated heritage assets on site there are two grade II listed buildings to the north east of the site (HUDC Depot and a building to the rear of the Depot). Development of this site has the potential to impact upon the setting of these listed buildings. To that end, the policy should include a criterion to preserve the grade II listed HUDC Depot and adjacent building and their settings. This should also be referenced in the supporting text.

HS2 - 6 Riddings Lane-This site forms part of the wider garden community proposals to the south of Harlow (Latton Priory). Any development in this area will need to give appropriate consideration to the need to protect the scheduled monuments and their settings (Latton Priory and Dorrington Farm Moated Site) and the preserve listed buildings and their settings, Latton Priory listed at grade 11 *and Latton Priory Farmhouse listed at grade 11. This requirement should be included in the policy and the supporting text.

HS2-7 Kingsmoor Recreation Centre- Kingsmoor House (listed at grade 11*) and its Lodge and Coach house (both listed at grade 11) lie to the east of the site. The allocation lies within the wider setting of these assets and provides a connection between the heritage assets and green wedge beyond. Historic England has concerns that development of this site would change and potentially harm the setting of the listed buildings. A heritage impact assessment should be undertaken, prior to the EiP, to establish the significance of the assets, and the potential impact of development upon that significance in accordance with Historic England's guidance (HE Good Practice Advice in Planning 1-the historic environment in local plans: <https://historicengland.org.uk/imagesbooks/publications/gpa-1-historic-environment-local-plans/>)
HE Good Practice Advice in Planning 2- managing significance in decision-taking in the historic environment: <https://content.historicengland.org.uk/images-books/publications/gpa2-managingsignificance-in-decision-taking/gpa2.pdf>
HE Good Practice Advice in Planning 3- the setting of heritage assets: (Dec 2017) <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/heritageassets/gpa3-setting-heritage-assets.pdf>
HE Advice Note 3- site allocations in local plans: <https://historicengland.org.uk/imagesbooks/publications/historic-environment-and-site-allocations-in-local-plans/>)
This will help to determine whether this allocation is suitable in terms of the historic environment. If the allocation is found to be acceptable in principle in heritage terms, a criterion should be included in the policy to ensure the protection of these listed buildings and their settings. This should also be included in the supporting text.

HS2 - 8 The Evangelical Lutheran Church, Tawneys Road - The Harlow Tye Green Village

Conservation Area lies to the west of this site .. Any development of the site may impact upon the setting of the Conservation Area. The policy should indicate that any development of the site will need to preserve or where opportunities arise enhance the setting of the conservation area. This requirement should be included in the policy and the supporting text.

We have not reviewed the smaller sites or indeed the employment allocations in ED1 or the hatches identified for mixed use in Figure 9.1. We request that you review these allocations again in a similar way to the above, identifying whether there are any heritage assets (or their settings) that would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect.

Typical wording might include:

combination of heritage assets - 'Development should conserve and where appropriate enhance heritage assets and their settings.'

This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014

listed building 'Development should preserve the listed building and its setting'.

This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

conservation area 'Development should preserve or where opportunities arise enhance the character or appearance of the Conservation Area and its setting'.

This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and para 137 of the NPPF.

Note that if you refer to character ... appearance use the word 'or' not 'and'

registered park and garden- 'Development should protect the registered park and garden and its setting.'

scheduled monument 'Development should protect the scheduled monument and its setting.'

Ideally, the policy should also mention the specific asset and any potential mitigation required.

Change To Plan:

Full Reference: O - 6693 - 8623 - HS2 Housing Allocations - None

858
6713 Object

Respondent: Mr James Humphreys [8561]

Agent: N/A

Summary: I currently live in Greygoose Park (backing on to the playing fields and Katherines Way) and I am very concerned about the council plans to build 69 homes on this land. While the minor inconvenience of the losing a view and house value decline are understandable, I do have additional concerns that I don't think have been taken into account when the council looked at this area. It is also disappointing that a council that prides Harlow on having green space and puts covenant control on residents and their homes, is actually flying in the face of its own rules and planning to build on every last bit of green land space. We bought our home three years ago so do have a fairly recent environmental report which leads me to ask the following questions.

Change To Plan:

Full Reference: O - 6713 - 8561 - HS2 Housing Allocations - None

6714 Object**Respondent: Mr James Humphreys [8561]****Agent: N/A****Summary: Flooding**

With the brook running parallel to Katherines Way, there is a flood risk. While the flooding at the moment is low risk and is mainly confined to the allotments (as you may be aware some are unusable due to the ground conditions and constant saturation), additional housing on this land which may act as an area for water to be drained into will put extreme pressure on this brook and leave the surrounding land liable to flooding as there will be no run off areas for water to go except for into the brook. This will place enormous pressure on a small stream that will flood repeatedly should this part of the plan go ahead. This flood risk was mentioned in our environmental impact report when buying our home. Your own flood impact report dated 2016 shows an existing flood risk on this area (page 4), so what would happen should houses be built there? This assessment has not been carried out in full.

Wildlife impact

There is a vast array of wildlife in the field next to Katherines Way including mice, shrews, hedgehogs, owls, amphibians, foxes and most importantly bats. As you may be aware bats are an incredibly protected species and any developments or changes to their natural habitat require a licence from Natural England. With the removal of trees and food sources for the bats, I feel that the plans to build housing in this area will severely impact this native and protected species. Your evidence base is from 2010/11. That is eight years old and it is not localised to specific parts of Harlow, meaning you have no idea what is living in the areas that have been earmarked for development. This is quite the assumption to make.

Road access

Currently, road access to Greygoose, Fir and Deer park is very limited and is off Kingsmoor Road at three points. Should additional housing be added to this area, more access points will need to be considered as the current roads are currently very narrow and or congested at peak times. While not a legal requirement it is often advised that large emergency vehicles should be able to pass through roads easily. At the current council access point to this land (for maintenance and mowing) that is not something that is achievable, with residents parking off the pavement and on the road. While residents are perfectly within their rights to do so, it shows that the long term view of putting extra housing in was not considered for this area and would not be able to cope with additional traffic for residents, let alone the large lorries and equipment needed to build additional houses. The road surfaces are not suitable nor are the streets wide for large equipment needed to build new homes. Also, with Public Health England bringing 10,000 jobs to the GSK site, the pressure that will be put on the roads in that area will be extreme already, let alone with the strain of building additional homes. Worryingly, there is no link up to Epping council who will also see some of these problems given their proximity to the area and roads that feed into Harlow, this may put Harlow council on a collision course with another authority. What plans do the council have to either build more roads, improve existing roads or improve public transport do deal with an extra 10,000 people in this small area?

Change To Plan:

Full Reference: O - 6714 - 8561 - HS2 Housing Allocations - None

6715 Object**Respondent: Mr James Humphreys [8561]****Agent: N/A**

Summary: Existing unoccupied housing
 There is already unoccupied housing in Harlow, which is not being utilised. Will the council prioritise filling these homes before building new ones? In addition, existing unused offices and brownfield sites are being converted into homes, yet this is not accounted for in the plan. Is this additional housing considered in an earlier plan or has this been overlooked as part of the target for new homes?

Lastly green space
 As you will be aware, green spaces have a strong link to happiness and healthcare outcomes. This has been known since Victorian times and has been referenced many times by government - <http://researchbriefings.files.parliament.uk/documents/POST-PN-0538/POST-PN-0538.pdf>. Getting rid of Green space and actual green belt land is a backwards step for Harlow and will add to the problems that currently exist with health deprivation. Your own council planning eludes to protecting environmental assets, not build on them. As a side point, the space in question beside Katerines Way is currently poorly maintained and there has been a noticeable decline in the management in this land. I'm currently having to fend off brambles, bind-weed and small trees starting to grow into my garden from your land.

Change To Plan: I therefore ask that you will consider opening these plans to a full public consultation across Harlow, given the size of the proposed developments. i have no issues with creating more homes in Harlow, but it has to be done in a logical and sustainable way with infrastructure considered hand in hand. This development plan has none of these things.

Full Reference: O - 6715 - 8561 - HS2 Housing Allocations - None

6719 Object**Respondent: Ms Jennifer Bedford [8557]****Agent: N/A**

Summary: I write concerning Jocelyns field and its inclusion in the Harlow local plan (location HS2-15) as a potential building plot. I believe it is an inappropriate site on many counts: it being part of green wedge - a key design feature of Harlow; it acts as a natural buffer to the A414; it is a place for recreation by local residents; and importantly, it is an essential and rich wildlife habitat with mature trees and varied ground cover. I also note that the plan quotes selectively from the historic documentation appertaining to the development of Harlow, taking such statements out of context to provide a validation for your proposals. There are many fundamental principles within the original town vision, both design and philosophical, which run counter to your assertions, and that should not be overlooked.

Change To Plan:

Full Reference: O - 6719 - 8557 - HS2 Housing Allocations - None

6720 Object**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: I can't readily see listed the land between the A414 and the M11 roundabout junction. The area beyond the BP garage and up to the roundabout at Hastingwood does not appear to be mentioned. Maybe this land does not fall in the Harlow boundary, but it does look like it is part of Harlow as it is before the junction. If denser and higher rise development is desired as it seems on reading the plan, this would appear to be an ideal site as there is no neighbouring residential area that would be adversely affected by higher rise blocks. This would be ideally situated for many car using commuters without impacting on the local highways in the town. Improved bus services to the train station would be an added benefit. I was dismayed to see valuable playing fields identified for development. Among the many benefits to residents young and old and our wildlife, these areas provide important breathing space and thinking space for contemplation too (open space=open mind).

Change To Plan:

Full Reference: O - 6720 - 8596 - HS2 Housing Allocations - None

6727 Object**Respondent: Mr MASOUD ESKANDARIAN [8625]****Agent: N/A**

Summary: I disagree and do object the proposed development plan and find that the Pre-Submission Local Development Plan is NOT legally compliant and NOT sound

Reference has been also made under page 5 & 6 of AECOM Sustainability Appraisal (SA) for the Harlow Local Development Plan May 2018, which has been announced as the framework of sustainable appraisal with the following criteria.

Change To Plan: I hope my concerns and objections are well received and understood, will be considered by Harlow Council who would decide to avoid proceeding with the development of HS2-5 land. I disagree with the development of HS2-5 greenfield land and suggest, Council should use alternative sites which have been already developed but do not currently perform well. The council should consider the expansion capacity and options of those sites rather than destroying this kind of natural habitats of South of Clifton Hatch neighbours (HS2-5 land) and wildlife. If the need for new housing developments demands the use of greenfield lands, then the outskirts of Harlow should be considered and suggested and not such a natural habitable greenfield land (HS2-5, South of Clifton Hatch) within Harlow.

Full Reference: O - 6727 - 8625 - HS2 Housing Allocations - None

6732 Object**Respondent: Natural England (Ms Sarah Fraser) [8628]****Agent: N/A**

Summary: Natural England considers this policy to be unsound - not consistent with national policy
This policy sets out the specific sites on which housing allocations are to be delivered. This policy sets out the quanta of housing that will be allocated by the Local Plan. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA') we cannot, at this time, advise that this policy is sound. Our concerns will be set out in more detail below.
Housing allocations should also consider potential impacts on Harlow Woods Site of Special Scientific Interest ('SSSI') which may be impacted in combination with allocations near Harlow from neighbouring Local Plans. A strategic solution is also being prepared for Hatfield Forest SSSI. Initial visitor surveys imply that the catchment is likely to be relatively large and may include parts of Harlow District. The plan needs to ensure that such impacts are considered appropriately through the plan and Sustainability Appraisal ('SA') and that solutions are provided for in policy.

Change To Plan:

Full Reference: O - 6732 - 8628 - HS2 Housing Allocations - None

6742 Object**Respondent: Ms Nikki Kellman [8629]****Agent: N/A**

Summary: Object to proposed Development on Playground west of 93-100 Jocelyns

As a regular visitor to Jocelyns I feel the parking situation needs to be addressed before more properties are developed

As a Harlow resident at present there are other development sites currently on the go eg: Gilden Way, old Rugby Club site, and extension to Newhall why are the council insistent of building on every bit of green land within Harlow, there are other priorities that need to be addressed.

I DO NOT THINK THIS IS A VIABLE AREA TO BUILD ON.

Change To Plan:

Full Reference: O - 6742 - 8629 - HS2 Housing Allocations - None

6766 Object**Respondent: Mr Ray Goodey [8580]****Agent: N/A**

Summary: We, as residents were informed that a land was required in order to prevent flooding in the kingsmoor area

No mention was made that the field would then change statues and form part of land for housing. the field as a natural green space and as used by many residents, not only feunnells residents. the Loral church use it, dog walkers, joggers , personal trainers/ It would be a real shame to lose it

Change To Plan: the council should be more open and with their information regarding the plans for the field. the council website has these plans well hidden within the site

Full Reference: O - 6766 - 8580 - HS2 Housing Allocations - None

6769 Object**Respondent: Mr Ricky Goldblatt [8631]****Agent: N/A**

Summary: I would like register our objection to proposed Development plan of 12 new houses on Development of playground west of 93 - 100 jocelyns Every household tends to have at least 2 cars per household now plus any visitors we feel this new plot will makes things worse then it already is as we struggle anyway. We also feel the wildlife will be disturbed and ruined as all the trees and bushes would need to be cut away to gain access on your proposed entrance on the A414, which by the way is a very dangerous road to put an entrance an we feel there will be dangerous accidents imminent.

There has been a massive decrease in parks in harlow and although there isnt one there a nice bit of greenary is just a good for him to play on without venturing to far from the House.

Change To Plan:

Full Reference: O - 6769 - 8631 - HS2 Housing Allocations - None

862

6775 Object**Respondent: Mrs Samantha Baldry [8554]****Agent: N/A**

Summary: Residents of the Fennells and surrounding areas are serious and passionate to protect this area for those who use and enjoy it now and for future generations.

This green space is widely used by the Fennells residents and surrounding community. It is used by children, their friends and family through out the year for recreation such as games of football, playing Frisbee, picnics, dog walking, large family games of rounders and building snowmen and snowball fights in the winter. It is a space for young children to play and exercise safely and to enjoy the outside environment. Many families bought their properties in this area because of this green space, knowing their children, or children they hope to have, had access to this wonderful space that would allow those that activities that small gardens will not allow.

the building of 26 homes what will cost the loss of this widely used space that is integral to this community, seems unbalanced and unsound.

Change To Plan:

Full Reference: O - 6775 - 8554 - HS2 Housing Allocations - None

6845 Object**Respondent: Mr Nigel Bangert [8638]****Agent: N/A**

Summary: Object HS2-5 South of Clifton Hatch with concern about the flood risk, as during heavy rain, garden has flooded.

I cannot see a way to make this plan or reasonable.

Change To Plan:

Full Reference: O - 6845 - 8638 - HS2 Housing Allocations - None

863

6862 Object**Respondent: De Merke Estates (Ms Emma Gladwin) [8643]****Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: HS2-1 Princess Alexandra Hospital

The first allocation is for 650 dwellings on the current Princess Alexandra Hospital Site. However, the LDP continually refers to the 'possible relocation' of the hospital, including at Paragraphs 4.28, 5.17, 5.28 and so on. Paragraph 5.29 states two potential locations are being considered through a Strategic Outline Business Case, one in the Gilston area north of Harlow and one to the east of Harlow within Epping Forest.

No evidence has been published as part of the LDP or its evidence base, including the Infrastructure Delivery Plan, to demonstrate that there is agreement from any other partners or bodies, such as the NHS, to relocate the hospital. There is also no indication of the cost of relocating the hospital and how this is to be funded, or any timescale.

Change To Plan: Given the lack of information as set out above, it has not been demonstrated that the site at Princess Alexandra Hospital is developable as set out in the NPPF. As such, it should not be allocated for housing development within the current LDP as it is contrary to Paragraph 47 and fails to be positively prepared, justified, effective or consistent with national policy.

Full Reference: O - 6862 - 8643 - HS2 Housing Allocations - None

6444 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: Policy HS2 and its delivery is dependent on the release of the Princess Alexandra Hospital site for housing. At the time of drafting, this has not been assured.

Change To Plan:

Full Reference: C - 6444 - 8588 - HS2 Housing Allocations - None

6478 Comment Respondent: **Miller Strategic Land [5769]** Agent: **Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: It will be important to adopt a flexible approach at East Harlow, so that if for any reason M11 J7A is delayed, a first phase of development can be allowed to commence ahead of the new motorway junction and in turn release land for a new hospital as soon as possible.
Change To Plan:

Full Reference: C - 6478 - 5769 - HS2 Housing Allocations - None
6492 Comment Respondent: **Harlow Civic Society (Mr John Curry) [5318]** Agent: **N/A**
Summary: The table on Page 57 - HS2 Housing Allocations lists 21 sites where development is considered possible within the existing built & green environment. In general we accept the proposals; indeed we consider that all but four of these sites as eminently suitable for re-development. In particular, we suggest that the "hatches" listed could become subjects of architectural competition, thus following in the tradition of appointing up-coming architectural practices to provide interesting locations within the existing townscape.
The four sites that we would not wish to appear on this list are:
Ref 3. Ref 9. Ref 15.
Ref 19.
Change To Plan:

Full Reference: C - 6492 - 5318 - HS2 Housing Allocations - None
6626 Comment Respondent: **GLADMAN (Mr Phill Bamford) [8618]** Agent: **N/A**
Summary: Paragraph 7.32 of the Local Plan suggests that the allocations in the Local Plan provide 105 dwellings over the remaining housing requirement of 3,642 dwellings. This amounts to a total flexibility of almost 3%. This is not considered to be sufficient flexibility to ensure that the minimum housing requirement is met.
Recent research suggests that in order to ensure that the Housing requirement set out in Local Plans is met or surpassed, flexibility of between 10% and 20% should be built into the Plan. It is therefore considered that additional flexibility is required in the HLDP.
Change To Plan:

864
Full Reference: C - 6626 - 8618 - HS2 Housing Allocations - None
6681 Comment Respondent: **Historic England (Ms Debbie Mack) [8623]** Agent: **N/A**
Summary: There is a lack of a detailed and proportionate historic environment evidencebase underpinning the Plan and the Sustainability Appraisal. This is a particular issue for the strategic site at East Harlow and also site HS2-7 (Kingsmoor). Therefore we have provided more detail on these policies. We suggest that HIAs are prepared for both of these sites in advance of the EiP to test the suitability of these sites in terms of the potential impact on the historic environment. It is important to establish the suitability of the site per se prior to allocation. Paragraph 158 of the NPPF requires a proportionate evidence base for Plans. WE also have suggested the inclusion of a concept diagram for Policy HS3.
Change To Plan:

Full Reference: C - 6681 - 8623 - HS2 Housing Allocations - None
6682 Comment Respondent: **Historic England (Ms Debbie Mack) [8623]** Agent: **N/A**
Summary: The site allocations in Policy HS2 require more detail. At the moment, the site address is simply listed. Paragraph 154 of the NPPF makes it clear that policies should provide a clear indication of how a decision maker should react to a development. The policies (particularly for the larger sites should be re-worded to include criteria for clarity and to provide greater protection for the historic environment and robust policies that provide the decision maker and developers with a clear indication of expectations for the sites.
Change To Plan:

Full Reference: C - 6682 - 8623 - HS2 Housing Allocations - None

6763 Comment Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532] Agent: N/A

Summary: Policy HS2 will need to have regard for the possibility that the Mental Health Trust may not relocate alongside PAH and may therefore remain on site. Furthermore, it should be noted that the constraints listed in paragraph 9 of this letter prevent development in certain areas of the site. Initial estimates undertaken by PAH suggest the site would provide circa 8ha of net developable area once these factors are accounted for.

The site planning exercise concerning disposal of the existing site produced a number of draft layouts (the most relevant of these are included in Appendix 2 to this letter). The study suggests that the site could realise circa 400-450 dwellings at a density of approx. 50dph. PAH wishes to stress that these layouts have not been prepared with a commitment to redeveloping the existing site for housing; thus, their only value is to identify a realistic site capacity from which disposal costs/revenue can be calculated to inform the financial exercise that is being routinely applied to all of the three OBC options.

Change To Plan: In view of the above, PAH requests that the indicative dwelling capacity on the site is reduced to reflect the above constraints to a figure in the region of circa 450 dwellings. Retaining a figure of 650dwellings may result in unrealistic expectations of what can be provided on the site or affect the soundness of this policy when scrutinised by the Inspectorate.

Full Reference: C - 6763 - 8532 - HS2 Housing Allocations - None

6828 Comment Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637] Agent: N/A

Summary: It is noted that the existing Princess Alexandra Hospital (PAH) site has been allocated for housing within Policy HS2 and would make a significant contribution to the delivery of the Local Plan's Housing target. EFDC has sought to support the relocation of the Hospital by way of Policy SP 5 of its Local Plan Submission Version which provides for the potential relocation of PAH within that part of the East of Harlow site within Epping Forest District. However, EFDC has some concerns regarding the deliverability for housing of the existing site within the period of the Local Plan bearing in mind work is still on-going with regard to finalising where or whether PAH would be relocated or indeed refurbished on the current site. It is not clear what the 'fallback' situation would be should the site, or the quantum of development indicated, not be delivered within the period of the Local Plan period.

Change To Plan:

Full Reference: C - 6828 - 8637 - HS2 Housing Allocations - None

6832 Comment Respondent: Sandra Beavis [5035] Agent: N/A

Summary: HS2-5 Land south of Clifton Hatch is one of the locations as a 'Reasonable Alternative'. Whichever Option was considered, building 36 dwellings will substantially increase the levels of traffic and if it is not known if there could be further improvements to transport infrastructure, then this site should not be built on.

Change To Plan:

Full Reference: C - 6832 - 5035 - HS2 Housing Allocations - None

865

6863 Comment

Respondent: De Merke Estates (Ms Emma Gladwin) [8643]

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: The SHLAA itself states that deliverability references the ability of the site to be developed within the next 5-years. To be considered developable, the definition within Footnote 12 of the NPPF was used, as set out above.

A total of 7 No. of the allocations are included in HDC's trajectory as delivering dwellings within the next 5-years. Of these, 4 No. are identified in the SHLAA as not being deliverable. HDC has not published any evidence reconsidering the sites or finding them deliverable, so there is a discrepancy between the LDP and its evidence base with the inclusion of these sites being contrary to Paragraph 47 of the NPPF.

Change To Plan:

Full Reference: C - 6863 - 8643 - HS2 Housing Allocations - None

6390 Object

Respondent: Ms Angela Parish [8550]

Agent: N/A

Summary: I very much object to the proposed housing on the field in front of my house. Firstly, the we will lose the wildlife which is rich in this area. Secondly, the parking around the estate is ridiculous at best especially when we have to put up with the Christian centre encouraging parking on the road up to the Crematorium making it very dangerous for the public to access the Nature Reserve and estate. Thirdly, the building of houses right in front of my house is NOT what I bought my house for. NO CONSULTATION HAS BEEN GIVEN-I'M VERY ANGRY!

Change To Plan: ABOLISH ALL PLANS TO BUILD ON THIS FIELD

Full Reference: O - 6390 - 8550 - HS2 Justification - i

6409 Object

Respondent: Mr Mike Stokes [8551]

Agent: N/A

Summary: This area (HS2-9) is widely used by the local community. we have a lot of children living In the area & building houses on here would remove their recreational area at a time when we are encouraging children to be outdoors & more active. It would also have a negative impact on the local wildlife and the already overcrowded parking. Residents of the Fennells area have in no way been informed of the intention to build additional housing in this land and we have not appropriately advised of our rights to have access to these plans and make comment.

Change To Plan: The plan to build on the site named HS2-9 should be abolished.

Full Reference: O - 6409 - 8551 - HS2 Justification - ii

867
6421 Object

Respondent: Gillian Atkins [8577]

Agent: N/A

Summary: Object to land between Barn Mead & Five Acres used for housing. Area floods in winter & many cars, several lorries and 2 tow trucks have been stuck in the mud. Risk of flooding being transferred to existing properties. Proposal is against Green Wedge Review 2014. Proposal against Gibbard Principals

Change To Plan: Remove this area from the housing proposal

Full Reference: O - 6421 - 8577 - HS2 Justification - None

6550 Object

Respondent: Miss Aimee Turvill [8607]

Agent: N/A

Summary: object to the above proposed development of 12 new houses on the above plot as we feel very strongly that the infrastructure of the roads and lack of parking as it is cannot accommodate for the additional houses

Change To Plan:

Full Reference: O - 6550 - 8607 - HS2 Justification - None

6551 Object

Respondent: Ms Angela Parish [8550]

Agent: N/A

Summary: never being made aware of any plans or consultation period so this is all rather disappointing to say the least. Also the extra traffic on to the estate would be horrendous. really disappointing that in my area we have the Nature Reserve where the wildlife will really suffer.

Change To Plan:

Full Reference: O - 6551 - 8550 - HS2 Justification - None

6552 Object

Respondent: B.K. & J.T. Drabble [8611]

Agent: N/A

Summary: object to the above proposed development of 12 new houses on the above plot as we feel very strongly that the infrastructure of the roads and lack of parking as it is cannot accommodate for the additional houses.

Change To Plan:

Full Reference: O - 6552 - 8611 - HS2 Justification - None

868

6479 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the allocation in Policy HS3 for 2,600 dwellings and associated infrastructure at East Harlow (in Harlow District). However, our client objects to the following specific criteria: HS3(a) pending publication and review of the completed Spatial Vision and Design Charter; HS3(b) regarding detailed wording on transport / highway impacts; HS3(c) pending publication of an updated Infrastructure Delivery Plan; HS3(f) regarding revised wording in relation to new neighbourhood centres; HS3(g) again pending publication of an updated Infrastructure Delivery Plan; and, HS3(i) on the basis that public art is not strictly necessary.

Change To Plan: Our client respectfully requests that Policy HS3 is amended as follows:

- Part (a) is subject to a holding objection, pending publication and review of the completed Spatial Vision and Design Charter.
- Part (b) should be reworded to read "provide highway improvements which cost effectively mitigate any significant impacts from development to ensure that there are no severe residual cumulative impacts on the road network;"
- Part (c) should be revised to read "provide necessary infrastructure, including, but not limited to, land and pro rata contributions for new health and education provision, as set out in the latest Infrastructure Delivery Plan (IDP);"
- Part (f) should be revised to read "provide for appropriate local retail, employment and other supporting uses, similar to neighbourhood centres elsewhere in Harlow;"
- Part (i) should be deleted in its entirety.
- The following sentence should be added to the end of the second paragraph: "For the avoidance of doubt, the Master Plan should provide sufficient flexibility to enable development to come forward at East of Harlow, in the event that a decision on the Princess Alexandra Hospital's relocation is delayed or deferred for any significant length of time."

Furthermore, the IDP should be updated prior to Examination in Public (EiP) to include further information on overall infrastructure costs and how those costs will be apportioned across the wider Garden Town.

Full Reference: O - 6479 - 5769 - HS3 Strategic Housing Site East of Harlow - iii, iv

6502 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: Buffer zone for the Harlowbury Brook, opportunities for enhancement and reference to WFD.

Change To Plan: We are pleased that this policy gives reference that development must provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment. However, this policy should be strengthened to give specific mention the Harlowbury brook that runs through this site. Providing a minimum 8m undeveloped buffer zone river enhancements such as removing or restoration will be strongly encouraged. Opportunities should always be sought to improve waterbodies where possible under the Water Framework Directive (WFD). Actions such as de-culverting, providing minimum eight metre undeveloped buffer zones adjacent to watercourses, removing hard banks and re-naturalising watercourses will all provide benefits and can help to achieve the aims of the WFD.

Full Reference: O - 6502 - 8443 - HS3 Strategic Housing Site East of Harlow - iv

6694 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: There are a number of heritage assets adjacent to, or surrounded by or close to the site. These include a number of listed buildings (House 20m NW of Stephen's Cottages, Hatches, Thatched Cottages, Spiers Farm, Pump, Franklins Farmhouse, Hubbards Hall and range of two service buildings and two barns at Sheering Hall all listed at grade 11 as well as Sheering Hall itself to the north of the site which is listed at grade 11 *).

We note that in the Harlow Strategic Sites Assessment AECOM report, the site scores red in terms of the historic environment. Given this sensitivity, as part of the evidence base for the Local Plan, for a site of this size with nearby heritage interest, we would expect a Heritage Impact Assessment prior to allocation to assess the suitability of the site for allocation. Without such evidence in place, the policy is not justified and is not in accordance with the NPPF. This needs to be prepared in advance of the EIP to inform the extent and capacity of the site. Please contact us to discuss the nature and extent of the work required to inform the Local Plan. Please also refer to our advice notes above.

As currently worded the policy includes no protection for the historic environment. Therefore, this does not comply with the NPPF. Whilst the design Charter (criterion) may include reference to the historic environment, at the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy. In the absence of this, we must conclude that the Policy is unsound. We would also suggest the addition of a bullet point to provide protection to the historic environment. This might read, "Conserve and where appropriate enhance the historic environment including (list key heritage assets) and their settings through careful design, landscaping heritage buffer zones.

We would also recommend the inclusion of a concept diagram to graphically portray the principles and requirements of the policy. We find this a helpful approach as a picture tells a thousand words.

Change To Plan:

Full Reference: O - 6694 - 8623 - HS3 Strategic Housing Site East of Harlow - None

870
6673 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Strategic Housing Site East of Harlow. Wording within this policy should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority

Change To Plan:

Full Reference: C - 6673 - 8622 - HS3 Strategic Housing Site East of Harlow - None

6733 Comment **Respondent: Natural England (Ms Sarah Fraser) [8628]** **Agent: N/A**

Summary: We also recommend that there should be a policy commitment to ensuring that masterplanning delivers net gains for biodiversity and the environment.

Change To Plan:

Full Reference: C - 6733 - 8628 - HS3 Strategic Housing Site East of Harlow - None

6829 Comment Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637] Agent: N/A

Summary: Policy HS3 covers the Strategic Housing Site East of Harlow as providing 2,600 dwellings and associated infrastructure. EFDC is pleased to note that the number of dwellings accords with our understanding of the overall capacity for the East of Harlow site as 3,350 dwellings with 750 dwellings located within Epping Forest District. The policy would benefit from a clear reference to the location of the East of Harlow site as between the administrative boundaries of Epping Forest District and Harlow District, and therefore requiring close joint-working between the two authorities to ensure the coordinated delivery of sustainable development. EFDC would also welcome clarity in the Plan as to how Policy HS3 and Policy HGT1 align, especially with regard to the production of a Strategic Masterplan for the whole East of Harlow site. With regard to infrastructure provision on the East of Harlow site, Paragraph 5.27 of the Plan sets out the key infrastructure required to support housing on the site. EFDC note that it would be useful to include definition on how the need for such infrastructure has been calculated based on both Harlow District and Epping Forest District needs. EFDC look forward to further discussing such matters in partnership with Harlow Council through the Harlow and Gilston Garden Town Infrastructure Delivery Plan.

Change To Plan:

Full Reference: C - 6829 - 8637 - HS3 Strategic Housing Site East of Harlow - None

6853 Comment Respondent: Redrow Homes (Ms Kate Holland) [8640] Agent: Redrow Homes (Ms Kate Holland) [8640]

Summary: Policies HGT1 and HS3 are amended to remove reference to the need for development solely to reflect the overarching design principles of the Spatial Vision of Design Charter and instead include for flexibility for development to be brought forwards in advance or absence of the documents.

Change To Plan: To allow the Site at Land South of Moor Hall Road to be delivered earlier in the Plan period and before the wider allocation would provide for additional housing within the first 5 years of the Trajectory. This would compensate for issues of deliverability of the smaller sites allocated under Policy HS2. As a consequence, this would assist in making the Plan "Effective", "Consistent with National Policy" and "Positively Prepared" and could therefore be considered "Sound" in accordance with Paragraph 182 of the NPPF.

Full Reference: C - 6853 - 8640 - HS3 Strategic Housing Site East of Harlow - None

6891 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452] Agent: N/A

Summary: This policy makes no specific reference in policy or supporting text to connections with/delivery of the (East-West) Sustainable Transport Corridor.

ECC work has established that this site must achieve high levels of sustainable mode share or its capacity may be compromised in order to prevent unacceptable impacts on the local road network.

Change To Plan: ECC (Highways) recommends that wording is added to the policy (criterion (b)) to make reference to connections with/delivery of the (East-West) Sustainable Transport Corridor.

Full Reference: C - 6891 - 8452 - HS3 Strategic Housing Site East of Harlow - None

871

CHAPTER: STRATEGIC GROWTH HS4 Justification
STRATEGY FOR HARLOW

6451 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the work to restore pitches for the Travelling Community locally.

Change To Plan:

Full Reference: S - 6451 - 8586 - HS4 Justification - None

CHAPTER: STRATEGIC GROWTH 8. ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY
STRATEGY FOR HARLOW

6648 Object **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]** **Agent: N/A**

Summary: Those of us who live in Harlow should know only too well how the present infrastructure and indeed public services are stretched to their limit here. Many of the roads, designed in the 1950's and 1960's, can no longer cope with the amount of traffic on them. Even roads built on estates in the last five years are so clogged up with traffic that they have become unofficial one-way systems. The plans for the odd new road and junction improvements are wholly inadequate for the massive increase in traffic which will be created by this plan, which will see the number of homes in the area increase by some 35%. Added to this are the Local Plans of neighbouring authorities which will see hundreds of new homes in places such as Sawbridgeworth, North Weald, Epping and many others, adding to the problems in Harlow as people from the above areas come into the town for shopping and leisure activities. It should be noted that there are no plans for a new secondary school, which will mean hundreds of children living just outside as well as within Harlow's borders will need to get to schools in Harlow, creating even more congestion.

Change To Plan:

Full Reference: O - 6648 - 8621 - 8. ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY - None

6734 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy
This policy allocates sites for employment uses. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA'), particularly in relation to air pollution impacts we cannot therefore, at this time, advise that this policy is sound. Our concerns will be set out in more detail below.

Change To Plan:

Full Reference: O - 6734 - 8628 - ED1 Future Employment Floorspace - None

6787 Object

Respondent: Weston Homes Plc (Mr David Poole) [8590]

Agent: N/A

Summary: Weston Homes Plc object to the proposed extent and protection of the Burnt Mill Employment Area as indicated in the Harlow Local Development Plan Policies Map Pre-Submission Publication (May 2018). As illustrated, this designation washes over land from to the east of Mill Lane, north of Elizabeth Way and bounded by the railway line to the north, extending eastwards towards the roundabout with Fifth Avenue and Edinburgh Way and continuing eastwards, north of Edinburgh Way to include Pearson House and its associated car park. In total the designated land extends to just over approximately 11ha. The area is not identified as suitable to accommodate Future Employment Floor space pursuant to Policy ED1.

The designation fails to take into account the now built out Harlow Gateway Development around the Harlow Town Station (Mill Court) which introduced mixed-use residential, hotel and restaurant floorspace on the site of the former Longman Publishers office HQ building. The designation neither takes into account recent development on the corner of Fifth Avenue/ Elizabeth Way (Ref.No HW/FUL/17/00563) nor the cessation of employment activity at Pearson House and which is subject to change of use from office to residential pursuant to Permitted Development rights (HW/COUOR/17/00295) for 258 dwellings.

The evidence base supporting the continued and unaltered employment land designation fails to adequately consider the up-to-date health, vitality and the current use and activity on the site and, for example, the vacancy rates of offices or the success of other B-Class uses in the vicinity but in particular, to the west of Fifth Avenue.

Change To Plan: As such the proposed extent of the employment allocation should be reviewed and rationalised to exclude land in the vicinity of the station, in particular the former Pearson House car park.

Full Reference: O - 6787 - 8590 - ED1 Future Employment Floorspace - None

6825 Support

Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]

Agent: N/A

Summary: The Pre-Submission Plan provides for 18-20 hectares of additional employment floorspace as recommended in the HMA Assessment of Employment Needs (2017) evidence base document. This provision is supported by EFDC. EFDC is pleased to note the inclusion of developing a visitor economy as set out in Policy ED4 and expresses support for this not only at the District scale but also recognising the strategic opportunity for the visitor economy, such as through the London Stanstead Cambridge Corridor Core Area. HDC may want to further stress the strategic scale visitor economy in Policy ED4.

Change To Plan:

Full Reference: S - 6825 - 8637 - ED1 Future Employment Floorspace - None

6782 Comment

Respondent: Weston Homes Plc (Mr David Poole) [8590]

Agent: N/A

Summary: The NPPF clearly states that Councils should avoid the long term protection of sites if there is no reasonable prospect of the site coming forward for employment purposes. The Harlow Employment Land Review (2013) suggests that demand for employment land is set to fall between 2011-31. However, contrary to this the West Essex and East Hertfordshire Assessment of Employment Needs has suggested that demand is going to increase between 2016-33. Although these documents reach different conclusions there is general agreement that B class uses should only be located in suitable areas. There is no evidence or understanding that the site remains suitable any longer for B class employment uses and in any case cannot viably deliver such uses either currently or in the foreseeable future.

More specifically we assert the following conclusions in relation to the land adjacent to Pearson House, in particular as part of the Burnt Mill allocated employment site which should be reviewed and redefined as:

Retaining a site for B class uses does not mean developers or occupiers will be attracted to the site in this location or the site will come forward for such uses. Indeed, for the reasons given there is no reasonable prospect of the site being used for 'B' purposes in the future.

The application site is situated to the north of the town centre, where it has been recognised the vacancy rates remain the highest along with the west of the town centre.

Office rents in Harlow are too low to justify office development and given increasing supply levels in preferred locations (such as London) rents in Harlow will be 'capped' for the foreseeable future.

The Harlow Employment Land Review recognises that it is predicted that there will be a fall in demand for industrial space during the plan period and Harlow is not a recognised office location. Therefore the site should be released as there will still be sufficient B class space available in the market area.

The application site is not of high quality, particularly given the granting of consent for Pearson House to be converted to residential use. This will cause a number of issues for B class users including noise and hours of use restrictions.

It is demonstrated that there is a sufficient supply of both vacant B class units and vacant employment land. Additionally, many of these sites are superior to the subject site and as a result, are more likely to come forward should there be an increase in demand for B class development. We have demonstrated through the marketing of other units that there is a demonstrable lack of demand for office units..

The application site is not suitable for large scale B8 use given the adjacent residential occupiers.

Through our viability assessment we have demonstrated that it is not viable to develop the site for B class uses. The negative figures are so apparent that this position (of a lack of viability) will remain indefinitely. As a result if the site is retained for such uses this will be contrary to national planning policy as set out within the NPPF.

Change To Plan: we have demonstrated that there is no reasonable prospect of the site being developed for employment purposes. Paragraph 22 of the NPPF states that "planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of the site being used for that purpose". The application site should therefore be released for the proposed scheme otherwise it will remain vacant and unused. Alongside the designation of the potential extent of employment land in the locality of Burnt Mill the wording of other policies including ED2 and PR1 should also be reviewed, latterly to ensure that any policy remains compatible with the NPPF with regard to release for other uses, not only employment generating purposes.

Full Reference: C - 6782 - 8590 - ED1 Future Employment Floorspace - None

6790 Comment

Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]

Agent: N/A

Summary: The potential to provide strategic employment land at the Garden Town Communities and at Latton Priory in particular which is close to junction 7 of the M11, warrants further examination to maximise the sustainability benefits of the development and make a major contribution to the delivery of new jobs in an accessible and marketable employment location. The employment land opportunities at Latton Priory should be reconsidered by both Harlow and Epping Forest in particular, given that Harlow has not specified in the pre-submission local plan how it intends on meeting its significant B2/B8 employment need over the plan period. The pre-submission plan also does not specify how the unallocated employment need across the FEMA (as identified in the Employment Needs Assessment 2017) is going to be accommodated

We consider Latton Priory to be the least constrained of the strategic site allocations, the site that is most capable of early delivery and that it has potential to accommodate housing additional to the current allocation.

Change To Plan:

Full Reference: C - 6790 - 7646 - ED1 Future Employment Floorspace - None

CHAPTER: STRATEGIC GROWTH ED2 Protecting Existing Employment Floorspace
STRATEGY FOR HARLOW

6892 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452] Agent: N/A

Summary: ECC is supportive of Harlow DC's aspirations of protecting Neighbourhood Service Areas and encouraging the provision of smaller start-up units, shared spaces and workhubs in these areas. (Policy ED2). However, it is considered necessary to also ensure that any resulting B1 class uses that are developed in these locations are adequately served by suitable broadband infrastructure (with consideration given to a minimum speed requirement)

Change To Plan: ECC (Economic Growth) recommends adding text to Policy ED2 to ensure that as a minimum, adequate broadband provision is ensured to meet modern business needs
ECC will work collaboratively with HC to discuss and agree appropriate detailed wording.

Full Reference: C - 6892 - 8452 - ED2 Protecting Existing Employment Floorspace - None

CHAPTER: STRATEGIC GROWTH ED3 Developing a Skills Strategy for Harlow
STRATEGY FOR HARLOW

6725 Comment Respondent: Mrs Karen Garrod [8596] Agent: N/A

Summary: Harlow is lacking in quality employment opportunities which will affect sustainability.

Change To Plan:

Full Reference: C - 6725 - 8596 - ED3 Developing a Skills Strategy for Harlow - None

CHAPTER: STRATEGIC GROWTH ED4 Developing a Visitor Economy
STRATEGY FOR HARLOW

6570 Support Respondent: Canal & River Trust (Ms Tessa Craig) [8612] Agent: N/A

Summary: The Trust welcomes the recognition given to the importance of the River Stort to the visitor economy of Harlow and to the need for improvements to Green Infrastructure links to connect the river with other attractions. People come from near and far to visit our waterways. They can have a beneficial impact on the local economy by providing sustainable active travel routes and attractive settings for waterside and on-water
Canal & River Trust Fradley Junction Alrewas Burton-upon-Trent Staffordshire DE13 7DN
T 0303 040 4040 E
enquiries.westmidlands@canalrivertrust.org.uk
Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB canalrivertrust.org.uk
businesses. By encouraging these uses in appropriate locations, development plans can help the waterway attract more people and support the local economy.

Change To Plan:

Full Reference: S - 6570 - 8612 - ED4 Developing a Visitor Economy - None

875

CHAPTER: STRATEGIC GROWTH ED4 Implementation
STRATEGY FOR HARLOW

6462 Support Respondent: **The Theatres Trust (Tom Clarke) [216]** Agent: **N/A**

Summary: The Trust supports the protection of existing cultural, community and sporting facilities which bring people into the town, as we would consider this to include the town's theatres.

Change To Plan:

Full Reference: S - 6462 - 216 - ED4 Implementation - None

6420 Comment Respondent: **Essex Bridleways Association (Mrs Sue Dobson) [7887]** Agent: **N/A**

Summary: Page 69 para 8.28: we note the aspiration to improve Green Infrastructure links and connectivity, especially with Lea Valley and Hatfield Forest. We would like to see this aspiration extended to include access for ALL user groups, including equestrians, where possible - especially as Hatfield Forest is already open to equestrian use and further connectivity will enhance the network open to those users.

Change To Plan:

Full Reference: C - 6420 - 7887 - ED4 Implementation - None

6433 Comment Respondent: **Mr David Naylor [8579]** Agent: **N/A**

Summary: The visitor economy in Harlow would benefit for a comprehensive mapping of footpaths and pedestrian routes within Harlow and to recreation and green assests. The sculpture trail provides an example of how such a mapping could raise the profile of harlow as a town friendly to walkers

Change To Plan:

Full Reference: C - 6433 - 8579 - ED4 Implementation - None

9/6 CHAPTER: STRATEGIC GROWTH 10. LINKING DEVELOPMENT SITES TO THE WIDER ENVIRONMENT
STRATEGY FOR HARLOW

6456 Comment Respondent: **STOP Harlow North [8588]** Agent: **Mr Jed Griffiths [8576]**

Summary: This chapter of the Local Plan claims to have embodied a network of Green Wedges and Green Fingers, respecting the principles of Sir Frederick Gibberd's Master Plan. As far as the internal structure of the town may be concerned, these principles seem to hold. Beyond the boundaries, however, there is a direct conflict with the Master Plan. An essential part of the design was the linking of the network of green spaces with "the Hertfordshire Hills beyond". This principle has been breached with the proposal to develop the area to the north of Harlow with housing.

Change To Plan:

Full Reference: C - 6456 - 8588 - 10. LINKING DEVELOPMENT SITES TO THE WIDER ENVIRONMENT - None

6398 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposal to include the Fennells field appears to take away a beautiful green space within the town. This field is part of my childhood and is used by lots of people including dog walkers and the church. I also do not want to be scared walking to school because of lots of additional cars using the roads near me. It is already dangerous crossing the roads now.

Change To Plan: Please remove the fennells field from your plans.

Full Reference: O - 6398 - 8560 - WE1 Strategic Green Infrastructure - i, ii, iii, iv

6571 Support

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: The Trust generally supports the protection and enhancement of green infrastructure in Harlow. Towpaths make excellent places for people to walk and cycle considerably. Not only is this great for recreation, it can be an attractive way for people to commute, reducing congestion, carbon emissions and poor air quality in the wider area and supporting people to lead healthier lives.

The Trust is supportive of connecting key locations with other infrastructure and recognises individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. New development often brings new people onto the waterways, particularly the towpaths. Improvements to signage and wayfinding is therefore also seen as a positive enhancement to help with connectivity of networks.

The policy describes a new linear 'Stort Riverpark'. As the owner and navigation authority of the river, the Trust would expect to be engaged in this proposal from an early stage and should be identified as a partner at point 10.15. The Trust is already working with other local authorities and partners to improve the River Stort environment elsewhere and is able to provide a strategic link between the Harlow area and surrounding areas.

Change To Plan:

Full Reference: S - 6571 - 8612 - WE1 Strategic Green Infrastructure - None

6735 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England is encouraged to see the plan taking a positive, strategic approach to Green Infrastructure. We commend the commitment to protection and enhancement of green fingers and wedges and to the delivery of a new linear 'Stort Riverpark.'

Change To Plan:

Full Reference: C - 6735 - 8628 - WE1 Strategic Green Infrastructure - None

6755 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: Policy WE1 states "...Green Fingers which are identified on the Policies Map... will be protected and enhanced". It is suggested that this policy acknowledges that this does not apply in areas with Strategic Infrastructure Requirements, identified within policies SIR1-3.

Policy WE1 also references that "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." PfP consider it sensible to include this on the Plan's associated Proposals Map in order to define this strategic green infrastructure.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6755 - 7958 - WE1 Strategic Green Infrastructure - None

6783 Comment**Respondent: Weston Homes Plc (Mr David Poole) [8590]****Agent: N/A**

Summary: In respect of protecting Green Belt land, the NPPF states at paragraph 83 that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."

The Council's current approach fails to identify how it is demonstrated that very special circumstances are determined. At this stage, the evidence base for the Council has not established or set out any selective criteria to set out how, it will provide a site by site justification for any Green Belt release by way of "very special circumstances" to support the Pre-Submission District Local Plan. This approach is not currently considered sound, and it should undertake a further full review of the Green Belt functions in light of other sites put forward or now know to be available within the town and which might also deliver other regeneration benefits, making better use of previously developed land within the settlement boundary as a priority.

Change To Plan:

Full Reference: C - 6783 - 8590 - WE1 Strategic Green Infrastructure - None

CHAPTER: STRATEGIC GROWTH WE1 Implementation
STRATEGY FOR HARLOW

6494 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: We welcome the inclusion of the "new linear 'Stort Riverpark'" in this policy. However, we would like to highlight that the Water Framework Directive has set out a number of actions and measures which, if implemented, will improve the Ecological Status/Potential of these environments. It is recommended that these be used as an identified tool to help shape the opportunities for development of the Stort Riverpark.

Change To Plan:

Full Reference: C - 6494 - 8443 - WE1 Implementation - None

6392 Object **Respondent: Mrs Samantha Baldry [8554]** **Agent: N/A**

Summary: The proposed allocation of the Fennells field for residential housing is in complete contradiction of the proposal to protect green wedges and fingers. This green space has been extensively used for recreation by members of the Fennells estate and surrounding areas for well over 20 years. It has been used for dog walking, football, kite flying, family games of rounders, picnics, snow man building and general exercise and enjoyment. It is an essential part of this community used by all ages and provides a safe place for children to be active and play. Do not remove!

Change To Plan: Remove the Fennells Field as a proposed site for residential housing.

Full Reference: O - 6392 - 8554 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6399 Object **Respondent: Mr Ethan Baldry [8559]** **Agent: N/A**

Summary: The Fennells Field as shown in HS2 needs be removed from this document as it proposes to take away an integral green wedge within the town. This document talks about protecting Harlow's green spaces yet you intend to remove them. I consider this the **** of the natural environment.

Change To Plan: This site needs to be removed from the local plan and the green space be protected. Harlow has proposed significant housing growth and i question why this site needs to be included considering the impact is minimal. I beg that you consider protecting the green wedge that has been an integral part of my childhood.

Full Reference: O - 6399 - 8559 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6401 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**

Summary: The proposed allocation of the Fennells field is not acceptable and does not protect the wonderful bio-diversity I have near my home. I have seen so many animals here and the thought that this will be taken away is horrible. As we are near the nature reserve the proposed allocation does not take into account that nature will be impacted. Houses on this land will ruin a wonderful environment and must not be allowed to happen.

Change To Plan: This site needs to be removed from the local plan and the green space be protected. Harlow has proposed significant housing growth and i question why this site needs to be included considering the impact is minimal. I beg that you consider protecting the green wedge that has been an integral part of my childhood.

Full Reference: O - 6401 - 8560 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6649 Object **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]** **Agent: N/A**

Summary: The Plan involves building on green belt land and land that was left as open spaces by the town's designer Sir Frederick Gibberd. In respect to the former, land is being taken out of Green Belt status for reasons which cannot be justified. In respect of the latter, seven play areas and or large open green spaces are being designated for future housing use. The loss of many of these areas (site numbers 3, 5, 9, 10, 11, 15 and 20) will mean the end of safe play or recreational activities on sites which have been enjoyed by residents for decades. In recent times Harlow Council have deliberately left many of them off their maintenance schedules making it difficult for residents to use these areas, in the hope that less objections to the proposals would be made. The proposal for a busway cutting through the very large open space from The Leisurezone to Fernhill Lane is completely at odds with Harlow's Masterplan, changing the whole area forever. It would need new junctions crossing Commonsidge Road and Southern Way, adding yet more congestion on these roads whilst at the same time taking away other recreational space in its path. At the heart of this matter is how Harlow Council has identified the list of 21 sites for future housing development from the list of many dozens of parcels of land it listed in an earlier document. The Harlow Alliance Party believe that areas other than those used for play and recreation (site numbers above) should be reclassified for future housing use.

Change To Plan:

Full Reference: O - 6649 - 8621 - WE2 Green Wedges and Green Fingers - None

6736 Support Respondent: **Natural England (Ms Sarah Fraser) [8628]** Agent: **N/A**

Summary: Natural England generally supports this policy.

Change To Plan:

Full Reference: S - 6736 - 8628 - WE2 Green Wedges and Green Fingers - None

6756 Support Respondent: **Quod Planning (Mr Philip Murphy) [7958]** Agent: **N/A**

Summary: In support of Policy WE2, it would be appropriate for the policy's supporting text, to include further detail on the future Green Wedge within the Stort Valley.

Change To Plan:

Full Reference: S - 6756 - 7958 - WE2 Green Wedges and Green Fingers - None

6793 Support Respondent: **Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]** Agent: **N/A**

Summary: We support the provision designation of the Green Wedges, and will work with the Council and the other authorities involved to deliver Strategic Green Infrastructure which will connect with the Green Wedge adjoining the Latton Priory site.

Change To Plan:

Full Reference: S - 6793 - 7646 - WE2 Green Wedges and Green Fingers - None

6627 Comment Respondent: **GLADMAN (Mr Phill Bamford) [8618]** Agent: **N/A**

Summary: Whilst it is appreciated that these designations have played a role in defining the form of Harlow as a settlement, the Council must ensure that they do not act as a constraint to development which prevents the district from meeting its overall housing requirement.

Change To Plan:

Full Reference: C - 6627 - 8618 - WE2 Green Wedges and Green Fingers - None

6717 Comment Respondent: **Jean Wright [5878]** Agent: **N/A**

Summary: To add insult to injury the main footpath across the site has been closed which was a great recreational source for people in Old Harlow. We have some open spaces here but in the main use of these is restricted to sport use. We will be very lacking now in green space. When the footpath reopens we will not be able to enjoy our once green area.

Change To Plan:

Full Reference: C - 6717 - 5878 - WE2 Green Wedges and Green Fingers - None

080

6830 Comment**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: Policy WE2 on the Role of Green Wedges and Fingers provides a strong commitment to the provision of high quality open spaces in Harlow. EFDC note that for the purposes of clarity it would be useful to align this policy's approach with the aspirations to introduce new varied uses to these as part of the Sustainable Transport Corridors associated with the Garden Town Communities. Policy PL4 permits small-scale development on Green Wedges and Fingers while ensuring that the roles and functions of the Green Wedges and Fingers and wider landscape setting are preserved. It would therefore be beneficial for the Plan to provide further clarification on how these policy requirements align, particularly in the context of Sustainable Transport Corridors.

Change To Plan:

Full Reference: C - 6830 - 8637 - WE2 Green Wedges and Green Fingers - None

CHAPTER: STRATEGIC GROWTH WE2 Implementation
STRATEGY FOR HARLOW

6434 Comment**Respondent: Mr David Naylor [8579]****Agent: N/A**

Summary: Currently the footpaths and pedestrian access route to and through green wedges and fingers are signposted inconsistently for example the walkway from the junction of Elizabeth Way and Parndon Mill Lane to the town centre has no signposts. Access to the green wedge in the north east of Harlow (including the Golf Club) is difficult. The footpaths are not signposted and so the benefit for local residents is limited. These footpaths are PRow and Harlow DC must be more assertive when dealing with Essex CC Highways to ensure that the county does not compromise the aspirations for walking in Harlow.

Change To Plan:

Full Reference: C - 6434 - 8579 - WE2 Implementation - None

6436 Comment**Respondent: Mr David Naylor [8579]****Agent: N/A**

Summary: I do not think the monitoring section of the LDP is clear on how to review and judge the quality of footpaths and pedestrian ways in Harlow. There appears to be no specific criteria for judging such things as amenity value, access value, nor is the guidance on judging possible diversions of footpaths clear. The aspiration expressed in the LDP for footpaths is to be applauded but the implementation would be helped by creating an overseeing group of interested parties perhaps as a subcommittee of the SIT environmental group.

Change To Plan:

Full Reference: C - 6436 - 8579 - WE2 Implementation - None

881

6395 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The Fennells Field needs to be removed as a proposed allocated site for residential development as the biodiversity of the area is threatened by this proposal. We have many visiting birds, snakes, newts, deer, frogs, toads, voles, bees and a variety of beautiful wild flowers and the nesting hedgerows that are under threat from this proposal.

Change To Plan: Site needs to be removed from the local plan proposals

Full Reference: O - 6395 - 8554 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6400 Object

Respondent: Mr Ethan Baldry [8559]

Agent: N/A

Summary: The proposed allocation of the Fennells field is not acceptable and does not protect the wonderful bio-diversity I have near my home. I have seen so many species including newts, badgers, deer, toads, birds of prey, hare, rabbits and voles in my time and the thought that this will be taken away is simply unacceptable. As we are located near to a SSSI site the proposal clearly does not take into account that nature will ultimately find a way to spread. Houses on this land will detrimentally affect such a wonderful environment and must not be allowed to happen.

Change To Plan: This site needs to be removed and kept to support the natural and bio-diverse environment. In addition the potential pollution from cars entering this environment will have an irreversible impact on the wider environment which I don't believe has been considered.

Full Reference: O - 6400 - 8559 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6402 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field is does not protect the wonderful bio-diversity I have near my home. Houses on the field will ruin affect such a wonderful environment and must not be allowed to happen. I am also worried that the increase in traffic will cause damage that will not be reversible as pollution from increased traffic will harm the natural environment

Change To Plan: This site needs to be removed and kept to support the natural and bio-diverse environment.

Full Reference: O - 6402 - 8560 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6737 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy (paragraphs 113, 17 and 118 of the NPPF)
This policy does not reflect the hierarchy of the different levels of protection afforded to international protected sites, national protected sites and local sites as required by paragraph 113 of the NPPF. Paragraph 113 of the NPPF requires that 'distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. Currently no distinctions are made.
In addition the policy doesn't reflect the Avoid, Mitigate Hierarchy as required by paragraph 118 of the NPPF. The policy also doesn't include any reference to the need to "promote the preservation, restoration and re-creation of priority habitats ,ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan".
Natural England considers this policy therefore requires significant rewording and strengthening to address these issues. It also requires reference to international sites (specifically Epping Forest SAC), priority habitats and priority species. With regards to Epping Forest policy wording should be influence by the updated HRA. Depending on the conclusions of the updated HRA this policy may also need to be strengthened to ensure there is a policy commitment to the delivery of any required Mitigation Strategy and that this is in place by the time the local plan is adopted. This will ensure the local plan and its proposals are compliant with the Habitats Regulations
We would also recommend that there is a policy commitment to ensuring that biodiversity net gain is delivered as required by paragraph 109 of the NPPF.

Change To Plan:

Full Reference: O - 6737 - 8628 - WE3 Biodiversity and Geodiversity - None

6628 Comment

Respondent: GLADMAN (Mr Phill Bamford) [8618]

Agent: N/A

Summary: Gladman object to Policy WE3 as it acts as a complete embargo on any development which has an impact on biodiversity and geodiversity assets. This Policy is therefore contrary to the Framework as biodiversity and geodiversity issues are considerations which should be should be taken into account by the decision maker in the planning balance.

Change To Plan:

Full Reference: C - 6628 - 8618 - WE3 Biodiversity and Geodiversity - None

6757 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: It would appear that there is a contradiction between Policy WE3 and Policy PL8. WE3 Biodiversity and Geodiversity requires all biodiversity and geodiversity assets in the district to be preserved and enhanced in contrast to PL8 Biodiversity and Geodiversity Assets which allows for the impacts on the assets providing negative effects are mitigated. Clarification on this contradiction is required.

Clarification is also sought on what is meant by Biodiversity and Geodiversity Assets. Policy WE3 explains that the most important assets have designations, however does not provide any detail on how other biodiversity assets are to be defined.

Change To Plan:

Full Reference: C - 6757 - 7958 - WE3 Biodiversity and Geodiversity - None

6393 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The proposal for the residential allocation of housing on the Fennells field goes against Harlow's Heritage and Sir Frederick Gibberds design principals! His vision was for communities within hatches that was made up of housing, shops and green space. With the proposed removal of this green space it appears that it completely ignores this principle, goes against Harlow's history and is simply a land grab for development.

Change To Plan: The Fennells Field site allocation needs to be removed.

Full Reference: O - 6393 - 8554 - WE4 Heritage - i, ii, iii, iv

6695 Object

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Change proposed to conserve to better reflect the NPPF ..
Refer to Registered Parks and Gardens (rather than just historic parks and gardens)
There are other non-designated heritage assets apart from Locally Listed buildings. These should be included.

Change To Plan:

Full Reference: O - 6695 - 8623 - WE4 Heritage - None

6629 Comment

Respondent: GLADMAN (Mr Phill Bamford) [8618]

Agent: N/A

Summary: Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset, the greater the weight that should be attached to it. The policies in the Local Plan therefore need to make such a distinction so as to ensure they are consistent with the Framework. The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policies in the Local Plan should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Once again, policies in the Local Plan need to reflect this guidance.

Change To Plan: Consequently, Policies WE4 and PL11 should be redrafted to better follow the guidance set out in the Framework as set out above.

Full Reference: C - 6629 - 8618 - WE4 Heritage - None

6663 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: It is considered that the text within Policy WE4: Heritage should be clarified to reflect the fact that archaeological remains are also non-designated heritage assets. In addition, development proposals may have an impact on archaeological remains (heritage assets), and therefore these cannot always be preserved or enhanced. It is suggested that the text should be amended to read:
"Heritage assets and their settings found within the district will be preserved or enhanced, or will otherwise be subject to adequate archaeological investigation and recording."

Change To Plan: It is suggested that the text should be amended to read:
"Heritage assets and their settings found within the district will be preserved or enhanced, or will otherwise be subject to adequate archaeological investigation and recording."

Full Reference: C - 6663 - 8622 - WE4 Heritage - None

6394 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The Fennells Field needs to be removed as a proposed allocated site for Housing. The field is next door to the conservation area of Parndon Wood and should not be taken away from the community. The wildlife that visit this natural habitat appears to be under threat from yet more inappropriate housing development in Harlow.

Change To Plan: Proposed Fennells field housing allocation site to be removed.

Full Reference: O - 6394 - 8554 - WE4 Implementation - i, ii, iii, iv

6435 Comment

Respondent: Mr David Naylor [8579]

Agent: N/A

Summary: The access to heritage sites in Harlow by using footpaths is inconsistent, a extension to the sculpture trail map to include all heritage sites would benefit local residents and visitors

Change To Plan:

Full Reference: C - 6435 - 8579 - WE4 Implementation - None

6445 Object **Respondent: STOP Harlow North [8588]**

Agent: Mr Jed Griffiths [8576]

Summary: Many of the strategic infrastructure requirements are not deliverable. In particular, there is doubt over the Second River Stort Crossing, and the connection in East Hertfordshire District. There are long term concerns over drainage capacity at Rye Meads WWTP, exacerbated by its proximity to wildlife sites of European importance.

Change To Plan: Delete SIR1-3 from policy SIR1 and item 4 of policy SIR2.
Augment paragraphs 11.29 and 11.30 with reference to long term issues at Rye Meads WWTP.

Full Reference: O - 6445 - 8588 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - iii

6493 Comment **Respondent: Harlow Civic Society (Mr John Curry) [5318]**

Agent: N/A

Summary: The Policies Map and Para 11.9(e) shows an STC that goes from N - S through the centre of the town. South of this, the indicative route passes through the N- S Green Wedge from the town centre to the southern boundary. At present the routes along this Green Wedge are reserved for walking, cycling and equestrian traffic. We are therefore extremely concerned that the indicative STC might in fact be a vehicular highway. If our concerns are correct then this policy is wrong. The N - S Green Wedge would never be suitable for a road of any description.

Change To Plan:

Full Reference: C - 6493 - 5318 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - None

6658 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]**

Agent: N/A

Summary: HCC as Highway Authority has concern that the wording regarding the widening of the Central Stort Crossing (as referred to in paragraph 11.9(c)) does not contain relevant measures to ensure adequate sustainable travel priority at this access point. The concern is raised due to the impact this may have on delivering a successful sustainable transport corridor between Gilston and Harlow.
Prior to the inception of a full north/south sustainable transport corridor, this concern was also raised by HCC during the emerging strategy consultation (2014) in relation to access to Harlow Town Station.
"In terms of access to Harlow Town Station, and indeed to Harlow town centre, transport links from the north are hampered by the station's proximity to the A414 and the lack of routes over the River Stort. Even if a second Stort crossing was provided, both routes would be heavily trafficked. Bus services from the north are therefore likely to be constrained by slow journey times and unreliability unless some sort of segregated busway can be created. High quality attractive public transport measures would therefore be required between any development allocations on the north and east side of Harlow, including the East Herts proposal for 5,000 to 10,000 homes in the Gilston area. This might include dedicated bus lanes or trams, and is likely to involve significant rail station enhancements potentially including a new point of access on the northern side and the provision of new bus routes. If sustainable transport connections are not of sufficient quality, the impact on the road network would be greater."
The Highway Authority has no objection to sustainable transport measures proposed that support Gilston and are committed to supporting a 60% sustainable mode share for the development.
HCC feel that if suitable policy is not in place for the provision of the sustainable transport corridor, it could impact on the deliverability of the North/South sustainable transport corridor, which is considered an 'essential priority' within the (Infrastructure Delivery Plan) IDP and by HCC to achieving the required uptake of sustainable travel. With regards to the A414, HCC are currently undertaking a detailed study of movement on the A414 including the impact of Harlow/Gilston, and intend to develop an A414 strategy, the current infrastructure provision for sustainable transport is included within that study.

Change To Plan:

Full Reference: C - 6658 - 8622 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - None

6480 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: In order for Policy SIR1 to be based on proportionate and robust evidence - i.e. to be "justified" - there is a need to revise the IDP prior to the EIP to address several shortcomings.

Change To Plan: The IDP should be updated prior to EIP to include further information on: (i) overall infrastructure costs; (ii) how those costs will be apportioned across the wider Garden Town; and, (iii) why specific developments are being expected to contribute towards those specific infrastructure costs.

Full Reference: O - 6480 - 5769 - SIR1 Infrastructure Requirements - ii

6601 Support **Respondent: East Herts District Council (Mr George Pavey) [8616]** **Agent: N/A**
Summary: East Herts welcomes Policy SIR1 Infrastructure Requirements which identifies land that will have future infrastructure uses and includes the Second River Stort Crossing.

Change To Plan:

Full Reference: S - 6601 - 8616 - SIR1 Infrastructure Requirements - None

6776 Support **Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]** **Agent: N/A**
Summary: Thames Water support Policy SIR1 which relates to infrastructure requirements and Policy IN6 which refers to the use of planning conditions to secure requirements. However, it is considered that the policy and supporting text should be amended to make it effective in relation to the delivery of wastewater infrastructure which could require the use of phasing conditions to ensure that any necessary wastewater infrastructure is delivered ahead of development being occupied. Since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for each new property connected. Wastewater treatment works infrastructure upgrades will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation. In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land and water courses and / or issues with water supply in the form of no or low water pressure. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.

Change To Plan: In order to ensure that the policy is effective in relation to the co-ordination of wastewater infrastructure requirements and new development it is considered that the following or similar text should be added to Policy SIR1:
Where appropriate planning permission for developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades.

In addition it is considered that the following supporting text should be added for Policy SIR1 The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.

Full Reference: S - 6776 - 8433 - SIR1 Infrastructure Requirements - None

6808 Support **Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]** **Agent: N/A**
Summary: infrastructure required to support development has been identified, particularly in relation to highway improvements including a new junction 7a on the M11, and welcomes the ongoing close collaboration with the relevant authorities to deliver these.

Change To Plan:

Full Reference: S - 6808 - 8636 - SIR1 Infrastructure Requirements - None

6501 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**
Summary: Infrastructure requirements involving crossing of the Stort should give reference to the TRBMP and policy PL10 Water Quality.
Change To Plan:

Full Reference: C - 6501 - 8443 - SIR1 Infrastructure Requirements - None

6572 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**
Summary: Policy SIR1 identifies the Central River Stort Crossing and the Second River Stort Crossing at River Way (SIR1-3), as infrastructure projects with land use implications. Whilst the Trust has no objection in principle to such proposals, any works would need to be carefully designed in terms of their impact on our waterway and we would wish to be consulted further in respect of their detailed design.

The Trust has previously provided comments in respect of proposals for the Central Crossing Bridge at which time concern was expressed about its proposed alignment and design which we would wish to see addressed in any future proposal.

Change To Plan:

Full Reference: C - 6572 - 8612 - SIR1 Infrastructure Requirements - None

6765 Comment **Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]** **Agent: N/A**
Summary: Draft Policy SIR1 - Infrastructure Requirements describes how the Council will work with statutory bodies and neighbouring local authorities to deliver the timely provision of infrastructure necessary to support development in the Harlow & Gilston Garden Town. An Infrastructure Delivery Plan (IDP) will be the primary means to achieve this and Policy SIR1 seeks to define the infrastructure items which have a land use implication that are initially identified for such funding.

Change To Plan: In view of the stated objectives of the plan, PAH requests an addition to Draft Policy SIR1 to include a hospital redevelopment (or relocation) within the list of Infrastructure developments necessary to make the impacts of the Strategic Growth Agenda acceptable in planning terms.

Full Reference: C - 6765 - 8532 - SIR1 Infrastructure Requirements - None

6893 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**
Summary: The text (in sixth paragraph) states:
The Policies Map identifies infrastructure items which have a land use implication.

Schools also have a land use implication and should accordingly be listed.

Change To Plan: ECC (Education) recommends that Policy SIR1 is revised as follows by adding a further entry to the current table of infrastructure items:

Ref. Infrastructure Item
SIR1-1 North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout
.....
SIR1-7 New schools provision

Full Reference: C - 6893 - 8452 - SIR1 Infrastructure Requirements - None

888

6894 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Policy IN1 - this policy states: "All development should have regard to the modal hierarchy as set out in the Strategic policies."

ECC identifies that no such modal hierarchy is set out anywhere in the current Draft Local Plan.

This needs to be added to the Strategic Policies list/section.

Change To Plan: ECC (Highways) recommends adding content to Plan (in paragraphs 11.7 - 11.11) to set out explicitly and clearly (and to explain) the transport modal hierarchy that is alluded to elsewhere in the Plan (in Policy IN1)

Full Reference: C - 6894 - 8452 - SIR1 Infrastructure Requirements - None

6895 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises the following in response to paragraph 11.13:

(1) ECC seeks to ensure that the stated 11.1 FE 'need' refers to the demand generated by housing included in the September 2017 scenario test plus Epping Forest DC's 750 homes east of Harlow

(2) In addition, it is recommended not to refer to a precise number of forms of entry due to the limitations of scenario testing. The text should instead refer to the additional infrastructure requirement to meet this level of growth.

(3) The Water Lane and Latton Priory allocation figures are not included in the above figure and will be served by a further secondary school required within Epping Forest district.

(4) It should be clarified that, the new 'Sir Fredrick Gibberd Academy' planned for Harlow, although contributing some capacity to meet housing growth, is being established to serve existing (Harlow) population cohort growth

Change To Plan: ECC (Education) recommends that subject to clarification on the first point raised (on validity / currency of the stated need), paragraph 11.13 is revised as follows:

In Harlow there is an overall need to provide additional secondary school places . A new secondary school will be provided in the Epping Forest District, in the new Garden 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.

NB This is an initial suggested form of wording, subject to review and subsequent refinement between ECC and HC.

Full Reference: C - 6895 - 8452 - SIR1 Infrastructure Requirements - None

6896 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: As above, ECC recommends not to refer to precise forms of entry being required. It is also not clear to the reader the number of homes covered by this figure or the additional infrastructure that is required. Reference to the IDP could be helpful in this respect.

Change To Plan: ECC (Education) recommends that paragraph 11.14 is revised to delete the reference to a specific number of additional FE primary school places and to add reference to the IDP.

Full Reference: C - 6896 - 8452 - SIR1 Infrastructure Requirements - None

6897 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This refers to 'Specific infrastructure items that are required to deliver growth locations and development sites will mostly be funded by Section 106 Agreements between the Council and the developer.'

S106 Agreements (where applicable) must include ECC - not just Harlow Council and the developer. This is critical to achieve delivery of education and highway infrastructure in particular and needs to be made clear for clarity, completeness and for the benefit of Plan users / developers, landowners, etc.

Change To Plan: ECC (Education) (Highways) recommends that paragraph 11.14 is revised to add reference to ECC being included within S106 agreements, where applicable.

Full Reference: C - 6897 - 8452 - SIR1 Infrastructure Requirements - None

CHAPTER: STRATEGIC GROWTH SIR1 Justification
STRATEGY FOR HARLOW

6458 Comment**Respondent: NHS West Essex CCG (Mrs Jolene Truman) [8584]****Agent: N/A**

Summary: Under Healthcare section 11.17 we have amended the statement slightly: 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 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 is also an option.

Change To Plan:

Full Reference: C - 6458 - 8584 - SIR1 Justification - None

6777 Comment**Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]****Agent: N/A**

Summary: In relation to the comment that further network modelling is being undertaken to understand sewer capacity in the area we can update with the progress as follows. The study where our delivery partner is assessing the impact of proposed development in and around Harlow has been terminated. We have received a high quality hydraulic sewer model and some assessment of the effect of the proposed development on the sewer network back from the project team. We intend to complete the work with internal staff ensuring that we assess those sites specified by the Planning Authority for the full extent of the plan period (and beyond in the case of Gilston Park). We are keen to work collaboratively with the relevant Planning Authorities to ensure that development is aligned with any necessary infrastructure upgrades required to support it.

It is stated that "it is anticipated that solutions to improving the network will be jointly funded by the utility providers and developers". In relation to sewerage network reinforcement works required to support any growth, these will be delivered by Thames Water and funded through the Infrastructure Charge.

Change To Plan:

Full Reference: C - 6777 - 8433 - SIR1 Justification - None

068

6678 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: It is also considered that paragraph 11.32 is amended to include both Essex and Hertfordshire County Councils' role as service providers in terms of waste disposal, youth services and fire and rescue: "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, fire & rescue, youth services, waste disposal, 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."

Change To Plan:

Full Reference: C - 6678 - 8622 - SIR1 Implementation - None

6573 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: Whilst the Trust has no objection in principle to such a proposal works would need to be carefully designed in terms of their impact on our waterway and we would wish to be consulted in respect of their detailed design.
The Trust has previously provided comments in respect of works relating to the Eastern Stort Crossing which enters Templefields Employment Area at River Way (number 4). at which time concerns were expressed about the proposed alignment and design of the bridge. We would wish to be consulted further in respect of the detailed design of any proposed works.
Canal & River Trust Fradley Junction Alrewas Burton-upon-Trent Staffordshire DE13 7DN
T 0303 040 4040 E
enquiries.westmidlands@canalrivertrust.org.uk
Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB canalrivertrust.org.uk
We would also request that paragraph 11.36 should be amended to refer to discussion with landowners and statutory consultees for completeness.

Change To Plan:

Full Reference: C - 6573 - 8612 - SIR2 Enhancing Key Gateway Locations - None

6784 Comment

Respondent: Weston Homes Plc (Mr David Poole) [8590]

Agent: N/A

Summary: In this regard the context of Policy SIR2 (Enhancing Key Gateway Locations) also fails to reference the train station or the sustainable transport links albeit that elsewhere the improvement of the railway infrastructure, or extension of Crossrail 2 to the site appears to be supported including with the with Spatial Vision and Strategic Objectives which also notes the need to make best use of underutilised land. This would include land on the former Pearson House site. This approach would identify and prioritise more sustainable, highly accessible sites in the vicinity of the train station and which would otherwise accord with the provisions of the NPPF, notably, the presumption of sustainable development.

Change To Plan:

Full Reference: C - 6784 - 8590 - SIR2 Enhancing Key Gateway Locations - None

6898 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: In referring to key gateway locations to be enhanced, the policy is not clear whether '4 Eastern Stort Crossing' refers to (existing) A1184 Cambridge Rd crossing, or the proposed additional (new) Stort Crossing from Gilston to River Way. This needs clarification for Plan users, although ECC suggest that both are included thus and listed.

Change To Plan: ECC (Highways) recommends that Policy SIR2 is reviewed and revised to clarify this ambiguity to prevent misunderstanding.

ECC recommends that this could be done by both revising the existing wording and adding further wording to ensure both crossings are included (as Key Gateway Locations).

Full Reference: C - 6898 - 8452 - SIR2 Enhancing Key Gateway Locations - None

6481 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client wishes to raise a holding objection to part (a) of Policy PL1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.
Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6481 - 5769 - PL1 Design Principles for Development - iii

6574 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**
Summary: Part (b) should include protection, enhancement and improvement of the River Stort as a distinctive environmental feature, natural asset and leisure and recreation attraction of Harlow. The Trust would expect development alongside the River Stort to be of a high standard of urban and architectural design.
Change To Plan:

Full Reference: C - 6574 - 8612 - PL1 Design Principles for Development - None

6696 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**
Summary: Again, at the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy.
We welcome criterion b.
Harlow New Town is based upon the Gibberd masterplan. It is important that new development respects this masterplan and protects the distinctive townscape which in itself is part of the historic environment
Change To Plan:

Full Reference: C - 6696 - 8623 - PL1 Design Principles for Development - None

6855 Comment **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**
Summary: The Policy refers to design rationale being required to take into consideration the Adopted Harlow Local Design Guide SPD, the Harlow and Gilston Garden Town Spatial Vision and Design Charter and relevant national guidance.
As highlighted earlier in these Representations, the Harlow and Gilston Design Charter and the Spatial Vision have not yet been produced or published. It is also understood from discussions with the Council that it is unlikely there will be direct public consultation in respect of either document.
It is therefore not possible at this point to assess whether compliance with these documents would place overly onerous requirements upon developers which may affect overall viability of a scheme.
Change To Plan: if reference to the Design Charter and Spatial Vision is removed we would be supportive of the Policy as a whole.

Full Reference: C - 6855 - 8640 - PL1 Design Principles for Development - None

6899 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC acknowledges that the policy references several key (locally focused) good design guides. In order to ensure that all the new elements of the Essex Design Guide are publicised for the benefit of designers (including increased emphasis on public health & well-being; digital design factors; etc.) ECC would wish to see a reference included to the new EDG

Change To Plan: Add reference to the newly updated Essex Design Guide, preferably within text of Policy PL1

Full Reference: C - 6899 - 8452 - PL1 Design Principles for Development - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL2 Amenity Principles for Development

6403 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field does not reflect this proposal. My privacy and my home are being impacted by this proposal and i am fearful of being overlooked and losing daylight and sunlight. These proposals detrimentally impact my aspect and outlook and i dont believe that any consideration has been given to the properties affected by this proposal.

Change To Plan: The proposed allocated site needs to be removed.

Full Reference: O - 6403 - 8560 - PL2 Amenity Principles for Development - i, ii, iii, iv

6703 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

It is not clear what this policy is trying to achieve. Our reading of the policy is that the Council will support applications that meet existing standards required by building regulations in relation to energy efficiency. However, whether or not a building meets existing building regulations is not a planning matter and as such cannot be considered as part of an application for planning permission. Our concern is that the policy could be used erroneously to refuse planning permissions that the Council determines are insufficiently sustainable. We therefore consider that this policy is not consistent with the principles, established in paragraphs 17 and 154 of the NPPF, that any policy within the plan should ensure that decision making is predictable and provide a clear indication as to how the decision maker should react to a development proposal.

Change To Plan: The policy PL3 and its associated paragraph 13.13 to 13.19 are deleted.

Full Reference: O - 6703 - 8450 - PL3 Sustainable Design, Construction and Energy Usage - None

6744 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

It is not necessary to stipulate adherence to Building Regulations. Furthermore, the policy lacks precision or measure when referring to 'high standards' of sustainable design and efficient energy usage. The supporting text refers to developers providing evidence of carbon dioxide reduction but does not detail any standard. Furthermore, the Local Plan does not have regard to the cost of meeting a (unspecified) standard over and above meeting Building Regulations.

This policy is not precise or consistent with the principles, established in paragraphs 17 and 154 of the NPPF, that any policy within the plan should ensure that decision making is predictable and provide a clear indication as to how the decision maker should react to a development proposal.

Change To Plan: The policy should be deleted or adapted to state that; 'Design should have regards to a range of measures to reduce energy consumption'.

Full Reference: O - 6744 - 8437 - PL3 Sustainable Design, Construction and Energy Usage - None

6575 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: We note the reference to onsite low carbon/ renewable energy technology in the justification to policy PL3 and would advise that our waterways provide readily available opportunities for developments to incorporate innovative technologies to make use of its water such as hydropower and the abstraction of water for the heating and cooling of buildings, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps.

Change To Plan:

Full Reference: C - 6575 - 8612 - PL3 Sustainable Design, Construction and Energy Usage - None

6404 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**
Summary: This proposal talks about small scale development yet 23 properties are being proposed on the allocation of the Fennells field. HOW IS THIS SMALL SCALE!!!! 23 homes will equate to 46 parking spaces increasing traffic on an estate road that is full to capacity with the existing 152 homes on the estate. I fear for my safety now let alone with additional homes added!

Change To Plan: The proposed allocation of the Fennells field for housing needs to be removed.

Full Reference: O - 6404 - 8560 - PL4 Green Wedges and Green Fingers - i, ii, iii, iv

6482 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: To be consistent with national policy and the most appropriate strategy when considered against the reasonable alternatives (i.e. justified), Policy PL4 should be amended to allow a wider range of uses in the Town's Green Wedges and Green Fingers.

Change To Plan: Our client respectfully requests that Policy PL4 is amended to include a new bullet point after (a) stating:
- "it is for social club, sports club, education or allotment related development, or public open space;"

Full Reference: O - 6482 - 5769 - PL4 Green Wedges and Green Fingers - ii, iv

6576 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**
Summary: Small-scale development referred to in point 13.23 should include facilities and services associated with an existing use including moorings and other waterway uses as required.

Change To Plan:

Full Reference: C - 6576 - 8612 - PL4 Green Wedges and Green Fingers - None

6631 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**
Summary: Whilst it is appreciated that these designations have played a role in defining the form of Harlow as a settlement, the Council must ensure that they do not act as a constraint to development which prevents the district from meeting its overall housing requirement.

Change To Plan:

Full Reference: C - 6631 - 8618 - PL4 Green Wedges and Green Fingers - None

6864 Comment **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**
Summary: HDC is proposing the release of over 110 ha of land from the Green Belt for the strategic housing site east of Harlow, being a substantial amount of Green Belt release. HDC is amenable to releasing Green Belt land despite the high national test to do so but is restricting development on Green Wedges with no justification or allowing a site-by-site analysis. Such an approach is not consistent with national policy and HDC should amend Policy PL4 to allow this site-by-site approach.

Change To Plan: The current wording of Policy PL4 is overly restrictive and does not allow for any consideration of whether a site contributes towards the roles and functions of the Green Wedge on a site-by-site basis, unduly giving a high level of protection to all land contained within the Green Wedge.

Full Reference: C - 6864 - 8643 - PL4 Green Wedges and Green Fingers - None

6900 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: In order to recognise the wider importance of the green wedges / green fingers a relatively minor wording improvement is recommended

Change To Plan: ECC recommends a revision in wording of Policy PL4 (e) as follows:

"It demonstrates that the roles, functions and historic significance of the Green Wedges and Green Fingers are preserved...."

Full Reference: C - 6900 - 8452 - PL4 Green Wedges and Green Fingers - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL4 Justification

6498 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 'Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6498 - 8443 - PL4 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL5 Justification

6499 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 'Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6499 - 8443 - PL5 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL5 Implementation

6405 Object**Respondent: Miss Erin Rose BALDRY [8560]****Agent: N/A**

Summary: This proposal talks about supporting the Gibberd principles and the protection of informal recreation areas. The proposed allocation of the Fennells field for housing does not promote this principle and i am appalled by this. This proposal needs to be reconsidered as i do not understand that how this proposal is compliant with this proposal.

Change To Plan: The proposed allocation of the Fennells field needs to be removed.

Full Reference: O - 6405 - 8560 - PL5 Implementation - i, ii, iii, iv

868

CHAPTER: DEVELOPMENT
MANAGEMENT

PL6 Trees and Hedgerows

6406 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells Field will ultimately remove the historic hedgerows. This proposal is therefore ridiculous and the site needs to be removed. The thought that development will be permitted to remove the historic hedgerows is unacceptable.

Change To Plan: The proposed residential allocation of the Fennells Field needs to be removed from this proposal.

Full Reference: O - 6406 - 8560 - PL6 Trees and Hedgerows - i, ii, iii, iv

CHAPTER: DEVELOPMENT
MANAGEMENT

PL7 Green Infrastructure and Landscaping

6738 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the inclusion of a policy relating to Green Infrastructure and the content therein but advises that environmental enhancement and biodiversity net gain should be added as an additional criteria.

Change To Plan:

Full Reference: S - 6738 - 8628 - PL7 Green Infrastructure and Landscaping - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL7 Justification

6500 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 'Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6500 - 8443 - PL7 Justification - None

6739 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the inclusion of a policy relating to Biodiversity and Geodiversity. The policy should be enhanced by reference to 'net gain' in keeping with paragraph 109 of the NPPF. This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy.

Change To Plan:

Full Reference: S - 6739 - 8628 - PL8 Biodiversity and Geodiversity Assets - None

6901 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC recommends revising Policy PL8 to follow the mitigation hierarchy and Government's Natural Environment White Paper

Change To Plan: ECC recommends that this policy is re-structured:

- a) Conserve and enhance existing biodiversity and geodiversity assets
- b) Where the above is not possible, appropriate and effective measures must mitigate the negative effects on these assets
- c) Where there is a residual impact, compensatory measures will need to be secured offsite.
- d) Creates new biodiversity and creates links to existing biodiversity and geodiversity assets to deliver net gain for biodiversity.

Full Reference: C - 6901 - 8452 - PL8 Biodiversity and Geodiversity Assets - None

6407 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field for housing does not in any way protect the the existing bio-diversity. The proposal to build 23 homes on this land and enhance the environment does not add up and this proposal is not fit for purpose.

Change To Plan: The proposed allocation of the Fennells field needs to be removed.

Full Reference: O - 6407 - 8560 - PL8 Justification - i, ii, iii, iv

6902 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that the Government supports "Net Gain for biodiversity" rather than "halting decline" Para 111 NPPF which is necessary to add compensatory measures in the requirements for sustainable development.

Change To Plan: ECC recommends revising paragraph 13.46 to replace the existing aims described as "halting decline" with the words "to achieve a net gain for biodiversity"

Full Reference: C - 6902 - 8452 - PL8 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL8 Implementation

6503 Support

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We welcome the inclusion of reference to invasive non-native species and their management, including biosecurity measures. Development sites should be checked for invasive species and measures should be put in place to follow biosecurity and eradicate the invasive species on site.

Change To Plan:

Full Reference: S - 6503 - 8443 - PL8 Implementation - None

6903 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that a reference to locally designated sites eg Local Wildlife Sites (LoWS) and Local Nature Reserves (LNRs) would be appreciated and a commitment to declaration of LNRs to provide opportunities for people to enjoy nature.

Change To Plan: ECC recommends adding reference to LoWS and LNRs, together with a commitment to declaration of LNRs to provide opportunities for people to enjoy nature. These improvements would help deliver the previously stated aim of helping to achieve a net gain in biodiversity, in line with NPPF objectives.

Full Reference: C - 6903 - 8452 - PL8 Implementation - None

6904 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Best practice for implementation of Policy PL8 would include a validation checklist for developments likely to affect biodiversity and geodiversity. Reference to the Essex Biodiversity Validation Checklist in Para 13.49 would enable biodiversity to be considered at the earliest stage in planning a development which de-risks it and avoids delays.

Change To Plan: ECC recommends adding a reference to the Essex Biodiversity Validation Checklist in Paragraph 13.49

Full Reference: C - 6904 - 8452 - PL8 Implementation - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL9 Pollution and Contamination

6740 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy for air quality.

Change To Plan:

Full Reference: C - 6740 - 8628 - PL9 Pollution and Contamination - None

901

6504 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: More weight should be given to groundwater to ensure the implementation of groundwater protection eg: including PRA's and steering development away from SPZ's

Change To Plan: Whilst we strongly support the inclusion of this policy, we believe that the justification and implementation could give more weight to groundwater. This is to ensure the risks to groundwater are minimised as much as possible, where contaminated sites have the potential to mobilise contaminants and consequently cause pollution.

Specific mention should be made that all land which is considered to be contaminated will require a Preliminary Risk Assessment (PRA) to be submitted as part of the planning application, and that where necessary further site investigations, detailed risk assessments, remediation strategies, long term maintenance regimes, and validation reports may be required if contamination is found. It should be explicit that planning permission will not be granted for development that poses a threat to the quality of surface and/ or groundwater, and should specifically reference the importance for all development to not detrimentally impact upon Source Protection Zones (SPZ) in particular, which are areas designated for the abstraction of clean drinking water. This should be cross referenced with PL10 (water quality). It should also mention avoiding high risk development proposals within vulnerable groundwater areas, specifically petrol stations and cemeteries.

Full Reference: O - 6504 - 8443 - PL9 Implementation - iv

6495 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: This policy should be strengthened through reference to the RMBP. It should include non-residential development to adopt the housing standard of number of litres per day, and reference evidence from your recent WCS. SUD's implementation needs to be made stronger. Minor wording additions to strengthen the policy.

Change To Plan: Water Quality

We recommend that the sentence 'Must not adversely affect water quality' should be reworded to 'Development should not cause deterioration to water quality and aim to improve it in line with Thames River Basin Management Plan (TRMBP) objectives.'

We welcome the policy reference to deculverting. This policy should be strengthened further by specifically stating that where deculverting or other river enhancements are shown to be unfeasible, the council will seek a financial contribution to restore another section of the same watercourse.

Whilst it is mentioned that 'development adjacent to water courses should seek to include restoration', this policy should be strengthened to include the requirement for all new development adjacent to designated main rivers to provide and maintain a minimum undeveloped 8 metre buffer zone to the watercourse. This is to enhance and protect local biodiversity and wildlife corridors, provide space for flood waters, and provide access for maintenance works. This distance is in line with our Flood Risk Activity Permit, which is legally required for certain works within 8 metres of a main river. The buffer zone will provide a naturalised buffer free of built development, be designed for the benefit of biodiversity (including the planting of locally appropriate, UK native species) and be 'undisturbed' by development (i.e. no fencing, footpaths, lighting or other development). Such proposals must also include a long term scheme put in place to protect and enhance the conservation value of the watercourse, in line with the requirements of the WFD and the TRBMP.

Water Management

Whilst it is positive to see Harlow adopt the Optional Technical Housing Standard of no more than 110litres per person per day, this only relates to residential buildings. As a result, it is noted that there is no reference to water efficient measures within non-residential buildings. It is expected that the growth planned for Harlow will include non-residential buildings. As a result, we would strongly encourage the requirement of a BREEAM 'Excellent' rating for water efficiency of non-residential buildings. This is referenced and evidenced in your recent WCS.

Additionally, there may be opportunities to regenerate existing properties through development. As older buildings are the least efficient with resource use, where regeneration does occur, we would strongly encourage retrofitting these buildings to increase their water efficiency. It is suggested that Harlow develop this policy to include these aspects.

Foul sewage is not referenced in this policy. Your WCS recommends 'early developer engagement with water companies is essential to ensure that sewerage capacity can be provided without delaying development.' This should also be addressed to relevant policy text for strategic site allocations.

Flooding

We are pleased with the amendments of this policy to include reference to Flood Risk Assessments (FRA's) and the increased emphasis on climate change and safe access and egress. However, we would still like to see mention of no inappropriate development will be permitted within Flood Zone 3b, as defined by your own Strategic Flood Risk Assessment (SFRA). The only development types that are considered compatible with Flood Zone 3b are 'water compatible' and 'essential' development, as defined within Tables 2 and 3 of the Planning Practice Guidance Flood Risk and Coastal Change section. The policy should also state that the functional floodplain should be restored wherever possible through a reduction of footprint within Flood Zone 3b as a result of development proposals.

Reference to WFD should be moved up to the Water Quality section of this policy. Specific reference to the legislative requirements of the WFD and the actions required by the TRBMP need to be included within the outline of PL10.

After the sentence 'it must not increase the risk of flooding elsewhere', its should be added 'and aim to reduce flood risk overall'.

'c) flood levels' should be replaced with 'finished floor levels'.

SUD's

This policy could be more robust by also including Natural Flood Management techniques. This could be very effective for developments near ordinary watercourses or smaller main river tributaries to slow the flow in low-order events, and provide habitat and multiple benefits.

6704 Object**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: Part 4(c) of this policy is unsound as it is not consistent with national policy.

Part 4(c) of this policy states that post development run off rates should be the equivalent of greenfield run off rates. On many brownfield sites it may be impossible to achieve this level of run off. Guidance by Defra5 on this matter also suggests that brownfield development must achieve close as is practicable to greenfield run off rates. This recognises that in some situations a development will not be able to deliver green field run off rates but that it should seek an improvement over the current site. Given the Government's focus on delivering more development on brownfield sites we would suggest it is essential that greater flexibility is provided in this policy.

Change To Plan: That the policy is amended to read:
"(c) Post-development run off rates should be reduced as far as practicable below existing run off rates for that site."

Full Reference: O - 6704 - 8450 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6577 Comment**Respondent: Canal & River Trust (Ms Tessa Craig) [8612]****Agent: N/A**

Summary: The quality of water in canals and rivers can affect how attractive they are as spaces for people to be on, in or alongside and impact on the plants and wildlife that rely on it. It is therefore important that new developments are appropriately located, designed to minimise risk and do not adversely affect our assets. We therefore welcome reference in Policy PL10 to development not adversely affecting the water quality of waterways. We note reference to surface water discharge to surface water bodies in para 13.68. and advise that our waterways present a number of opportunities to support and enhance urban development, with particular reference to water management. With careful design and assessment, our waterways may be able to receive runoff from future development sites, providing sustainable options for site drainage (although mitigation works to the canal infrastructure may be necessary to cope with this.) The Trust is not however a land drainage authority and any such discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.

Change To Plan:

Full Reference: C - 6577 - 8612 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6723 Comment**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: The report acknowledges that Harlow is at severe risk of water shortage being in the driest region in the country. The proposed number of new homes appears too high in the circumstances for this region. Other regions of the UK do not have such a high demand for water supplies. On the flipside of this, with the number of green spaces having been identified for potential development, there is also a high risk of flash flooding during heavy downpours which seem to be on the increase. Would measures be taken on new housing developments to mitigate this risk? Would new homes be required to have water butts to collect rainwater, particularly during heavy rainfall to prevent it flowing into the drainage system causing the drainage system to be overwhelmed? When designing new flats which have landscaped areas and gardens, could it be a requirement that rainwater collection/re-distribution equipment be installed? For instance, industrial sized water butts connected to agricultural watering hoses that trail around the landscaped/planted beds so that excess water filters into these areas rather than into the drainage system? Maybe, new plumbing systems could provide for rainwater to be harnessed and stored for water to fill WC cisterns?

Change To Plan:

Full Reference: C - 6723 - 8596 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

904

6778 Comment**Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]****Agent: N/A**

Summary: Policy PL10 makes reference to SuDs and that where they are required they will provide the most sustainable option from the SuDs hierarchy. Thames Water support the use of SuDs and it is suggested that the policy should be expanded to encourage their use even where not required by national policy. In addition the retrospective use of SuDs should also be supported by policy as such practices could help remove surface water from existing sewers freeing up capacity.

Change To Plan: It is therefore suggested that Policy PL10 should be amended to include the following text at the end of Section 4:
 "The council encourage the use of SuDS on all development proposals due to the environmental benefits they can deliver. In addition, the Council will support the retrofitting of SuDS."

Full Reference: C - 6778 - 8433 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6905 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC (as LLFA) advises that a number of changes to this policy would be beneficial and assist in its use.

(1) Re-order so that current part 1. Water Quality is dealt with further down the policy sequence, since this area is considered to be less capable of effective regulation and enforcement than other subject areas of the policy.

The policy (or text) currently does not mention Critical Drainage Areas (in respect of surface water flood risk) and thus does not signpost the valuable work that the LLFA has produced for the Harlow urban area and its development implications

(3) revise wording of part 3 (c)

(4) revise wording of part 3 (g)

(5) revise wording of part 3 (h)

(4) revise wording of part 4 (c)

Change To Plan: ECC (LLFA) recommends revising Policy PL10 in the interests of improved wording, clarity and policy implementation, as follows:

Re-order the policy so that current part 1 (Water Quality) is dealt with later on in the policy. ,This could be achieved conveniently if this part becomes the new final part (at new part 4)

Add reference to Critical Drainage Areas (to support the policy) - this could be done at paragraph 13.61, which already mentions surface water flooding.

Revise part 3 (c) as follows:

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;

Revise part 3 (g) as follows:

flood flow routes should be configured to enable surface water to drain;

Revise part 3 (h) as follows:

where necessary, planning permission will be conditional upon the submission and approval of a drainage management strategy that addresses all forms of flood risk.

Revise wording of part 4 (c) as follows:

achieve runoff rates in line with the guidance of the non-statutory technical standards for sustainable drainage;

Full Reference: C - 6905 - 8452 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

905

6497 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: Specific mention for WFD. SUD's policy should be strengthened using evidence from WCS.

Change To Plan:

Full Reference: C - 6497 - 8443 - PL10 Justification - None

6496 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: Specific mention needed for TRBMP. Inclusion of floodplain compensation and strengthening of SUD's policy.

Change To Plan:

Full Reference: C - 6496 - 8443 - PL10 Implementation - None

6779 Comment

Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]

Agent: N/A

Summary: Section 13.68 sets out the drainage hierarchy. It is considered that discharge of rainwater to a combined sewer should only ever be done as an absolute last resort once it has been demonstrated that all other options are not possible. With regard to the hierarchy set out in this section it is considered that the hierarchy should be expanded to include other options such as storage of rainwater for later use and attenuation of rainwater. This approach is adopted in Policy 5.13 of the London Plan.

Change To Plan: It is therefore suggested that the hierarchy set out in Section 13.68 is revised to read as follows:
"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
4. attenuate rainwater by storing in tanks or sealed water features for gradual release
5. discharge rainwater direct to a watercourse
6. discharge rainwater to a surface water sewer/drain
7. discharge rainwater to the combined sewer."

Full Reference: C - 6779 - 8433 - PL10 Implementation - None

6450 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: Thank you for the inclusion of Public Benefit as regard Heritage Assets (PL11)

Change To Plan:

Full Reference: S - 6450 - 8586 - PL11 Heritage Assets and their Settings - None

6683 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Reference to enabling development in Policy PL11 should be deleted.

Change To Plan: Reference to enabling development in Policy PL11 should be deleted.

Full Reference: C - 6683 - 8623 - PL11 Heritage Assets and their Settings - None

6697 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: We welcome the changes made to the policy since the previous consultation.

We continue to suggest that the policy should include a requirement for a desk based assessment or field evaluation to be submitted where proposals affect sites or are within or adjacent to sites of known archaeological interest or sites where there is reason to suggest there is archaeological interest Whilst this is mentioned in paragraph 13.88, it should also be included in policy.

We suggest the deletion of the final paragraph in the policy. By definition within the NPPF, enabling development is development that is not otherwise in accordance with adopted policy.

We are therefore of the view that a policy on enabling development is not a necessary component of a local plan document A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy.

Paragraph 140 of the NPPF and Historic England's suggested framework for enabling development contained within Enabling Development and conservation of the significant places, revised 2012 consider this matter. The Historic England advice predates the adoption of the NPPF and should be considered in the context of Paragraph 140 of the NPPF which states the following:

Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

We appreciate that the final paragraph of your policy is an attempt to have a policy to address Heritage at Risk. However, as we previously commented a policy effectively on enabling

development is not the best way to achieve this. We continue to advise that a policy on heritage at risk rather than enabling development would better achieve the desired outcome.

Change To Plan:

Full Reference: C - 6697 - 8623 - PL11 Heritage Assets and their Settings - None

6906 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises that in respect of Policy PL11 (a) 'setting' is not an asset itself upon which harm can be caused but rather development within an asset's setting can cause harm to the asset's significance if the setting contributes to its historic/architectural interest of aesthetic/historic/evidential/communal value.

On part (b) ECC advises that It would be advantageous to use a word other than 'harmonises' as this can be seen to inhibit modern design / architecture. Instead, 'respond to' or 'reflect' would likely be more engaging.

On part (c) ECC advises that this element could reference the Harlow New Town Master Plan, in effect testing development to see if it respects the fundamental principles of the New Town. For example the green wedges, neighbourhoods, connectivity, grain etc. This could be integrated into the bracket of examples. ECC also suggests a further consideration by which to assess these proposals (in terms of revealing an asset better)

Change To Plan: ECC recommends that Policy PL11 (a) is revised as follows:

"the impact of development upon the character, appearance, setting, or any other aspect of the significance of the asset'

Revise part (b) replacing the current word 'harmonises' with either 'respond to' 'or otherwise 'reflect'.

ECC also advises the consideration of including reference to Harlow New Town Master Plan within this criterion, where it could sit within the bracketed text that provides examples of relevant considerations

Revise part (d) as follows:

"The extent to which the development would enhance, or better reveal, the significance of a heritage asset".

Full Reference: C - 6906 - 8452 - PL11 Heritage Assets and their Settings - None

6907 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary:

ECC advises that It is not clear what the third paragraph is requesting or the reasoning behind it - it appears to be slightly confused about the difference between a Heritage Statement and a Management Plan and of the correct time to request these.

Change To Plan: ECC recommends two relatively minor amendments to the third and fourth paragraphs respectively, as follows:

"Where development has the potential to affect a heritage asset..."

And, revise the final paragraph as follows:

"...it must be demonstrated that the development presents the asset's optimum viable use and is necessary...."

Full Reference: C - 6907 - 8452 - PL11 Heritage Assets and their Settings - None

CHAPTER: DEVELOPMENT
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6908 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC suggests additional wording for completeness of this paragraph, in respect of locally listed assets.

Change To Plan: ECC recommends adding additional content to paragraph 13.78, as follows:

Designated heritage assets can include listed buildings, curtilages of listed buildings, conservation areas, archaeological remains, Scheduled Monuments and historic parks and gardens. Locally listed buildings and those archaeological sites that are not Scheduled are known as non-designated assets and also contribute to the overall significance of the historic environment of Harlow. Historic England administers national designations which include all designated heritage assets apart from conservation areas'.

Full Reference: C - 6908 - 8452 - PL11 Implementation - None

806

6724 Comment

Respondent: Mrs Karen Garrod [8596]

Agent: N/A

Summary: Developers- housing quality

It would be pleasing to see some new high quality housing developments in Harlow. Some housing developments in other areas have not been without their problems resulting in great inconvenience to the owners to resolve the issues. Does Harlow Council consult with other Local Authorities and Housing Associations in neighbouring counties to seek recommendations and reviews and share experiences?

Planning specifications and considerations

There are many specifications and factors specified in the reports to be considered when housing is planned. Many of these are specific to the Town in local historical and traditional planning context. These are very important and should be respected when considering development plans that have been submitted. However, if decisions can be appealed and referred to central bodies and overturned, then these specifications would not amount to much and could become irrelevant. Would this happen?

Proportionate development

Is there any requirement for the size of buildings to be proportionate to the land proposed to build them on? For instance, will sufficient green spaces, verges and gardens be provided for? As acknowledged, green wedges and fingers are intrinsic to Harlow's character. Will new flats and houses be situated far enough away from the roadside to retain this character?

Flat developments

Rather than building flats in square or rectangle blocks with 4 or 6 flats on each floor opposite each other, why not set them out in crescent or horseshoe shape in rows of single flats sited side by side? Communal gardens could be included with flats being designed around the garden areas (like the mews style houses in Bishopscote). If this style were mirrored for flats, it would lessen the impact of the block on the area as it would only be one flat deep .

Would new trees be planted around new flat developments to minimise the impact and provide screening? Drought resistant types could be used with finer root systems so that

when the trees mature, they do not interfere with the structure.

It has been noted that families prefer houses over flats. If there were high quality apartments with 2-3 bedrooms and a large communal garden and garages, they may have wider appeal. Many people desire a garden especially families. If there were a large communal garden this would be a big benefit to bring residents together and for the children to enjoy.

Change To Plan:

Full Reference: C - 6724 - 8596 - 14. HOUSING - None

6483 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client wishes to raise a holding objection to the third paragraph in Policy H1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6483 - 5769 - H1 Housing Allocations - iii

6856 Comment

Respondent: Redrow Homes (Ms Kate Holland) [8640]

Agent: Redrow Homes (Ms Kate Holland) [8640]

Summary: We are supportive of the principle of Policy H1 in its assertion that development of the strategic housing Site East of Harlow will be supported. However, the Policy also requires the provision of a Masterplan to be submitted and development must accord with the Harlow and Gilston Garden Town Spatial Vision and Design Charter. As within the comments on Policy PL1, the Design Charter and Spatial Vision are at an early stage and have not yet been produced.

The Policy is therefore not 'Justified' as it is not based upon any supporting viability evidence to demonstrate that these requirements will not affect deliverability of the Plan and cannot be found to be 'Sound' as it is currently worded.

Change To Plan: reference to the Master Plan, Design Charter and Spatial Vision should be removed

Full Reference: C - 6856 - 8640 - H1 Housing Allocations - None

6408 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of Fennells Field does not meet this proposal. Any development will have an unacceptable adverse effect on the character of the locality, the appearance of the street scene and the amenities enjoyed by the occupiers of neighbouring dwellings. THIS PROPOSAL IS OUTSIDE MY FRONT WINDOWS! As for parking the proposal to add in another potential 46 spaces off-street parking as well as impacting on existing access arrangements is fundamentally flawed!

Change To Plan: The Fennells field needs to be removed as a proposed housing site in this document.

Full Reference: O - 6408 - 8560 - H2 Residential Development - i, ii, iii, iv

6865 Comment

Respondent: De Merke Estates (Ms Emma Gladwin) [8643]

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: Policy H2 recognises that there has been a small but constant supply of new housing on infill sites and garden plots, which can contribute to meeting local housing need, supporting such development subject to various criteria being met.

Policy H2 recognises the constraints of the District and seeks to support residential development where it would be appropriate, in accordance with the NPPF. As such we support the aims of Policy H2 in encouraging residential development on suitable infill sites, garden plots, minor residential schemes and vacant plots.

Change To Plan:

Full Reference: C - 6865 - 8643 - H2 Residential Development - None

6909 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Policy H1 (Housing Allocations) mentions the requirement for development of allocated sites to meet specified design requirements. This stipulation also needs to apply to any other (unidentified / unallocated) sites that come forward by adding this requirement under Policy H2.

Change To Plan: ECC recommends adding a further criterion to Policy H2:

'(e) Development of all housing sites must accord with the principles of the Harlow and Gilston Garden Town Spatial Vision and Design Charter'

Full Reference: C - 6909 - 8452 - H2 Residential Development - None

6440 Object

Respondent: Morley Grove Residents Association (Sheila Sullivan) [5043]

Agent: N/A

Summary: I object to H3.1 because the threshold for number of HMOs in a row should be 1 in 10 (10%) and not 1 in 5 as proposed. Nationally the 1 in 10 threshold is the one most commonly adopted by local authorities. Greater density of HMOs adversely affects community cohesion. It is important for the town that an Article 4 Direction is established to remove permitted development rights for conversion of Use class C3 (single dwelling-house) to C4 (small HMO). This would ensure all such conversions needed prior planning consent.

Change To Plan: Article 4 Direction removing permitted development rights for conversion from C3 to C4 to be included to ensure prior planning consent is required and both neighbours and developers have access to an independent appeals procedure through the Planning Inspector. The threshold for HMOs would not exceed 1 in 10 out of a row or area of units.

Full Reference: O - 6440 - 5043 - H3 Justification - None

6484 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client recommends that Policy H5 is amended to limit Part M4(2) to the affordable element only and Part M4(3) to 10% of the affordable element.

Change To Plan: Our client respectfully requests that the first two paragraphs in Policy H5 are amended to read:
"All new affordable dwellings must be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs.
In addition, for major residential development, 10% of new affordable dwellings must be Building Control Part M4(3) standard (i.e. wheelchair user dwellings)."

Full Reference: O - 6484 - 5769 - H5 Accessible and Adaptable Housing - iv

6588 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: The emerging policy takes this extant policy position much further stating that all new dwellings must be accessible and adaptable dwellings, in accordance with Part M4(2) of the Building Regulations.

There is a requirement under Building Regulations for all properties to meet Part M4(1), with Part M4(2) being an optional requirement. The policy requirement for all dwellings to comply with an optional Building Regulation requirement is not therefore justified and is considered to be unsound.

Change To Plan: This policy is considered to be flawed and therefore unsound, it is recommended that it be deleted to ensure housing development can be readily delivered and the five year housing land supply not brought into question.

Full Reference: O - 6588 - 8451 - H5 Accessible and Adaptable Housing - None

6705 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: This policy is unsound as it has not been justified

In considering whether to implement the optional technical standards on accessibility PPG sets out in paragraph 56-007 that local planning authorities must take into account the likely future needs for such homes, the type of homes needed to meet evidenced need, the accessibility of existing stock, how needs vary and the overall impact on viability. With regard to need it cannot be considered an appropriate interpretation of Government policy that all new homes should be built to their higher optional standard. Had this been the case then the Government would have made these standards mandatory. The Council's limited evidence solely reflects national concerns regarding an ageing population and as such provides no unique circumstances that warrant all new homes to be built to Part M4(2). It must also be remembered that the majority of the existing elderly and disabled population will already live in the Borough and are unlikely to want to move home. As such to require all new homes to be built to such standards would be inappropriate and largely ineffective in addressing the needs of those requiring a more accessible home. Whilst we recognise that there may be a need for some new homes to be built to M4(2) the evidence does not show that there is a need for all the new homes to be built to this standard. With regard to Part M4(3) the Council indicates within the policy that a proportion of all homes on major development sites should be built to part M4(3) on the basis of the proportion set out in the latest SHMA. This proportion is then set out in paragraph 14.25 of the Local Plan. Firstly, we would disagree that the proportion will be based on the latest SHMA. The impact of this standard on the cost of delivering new homes is significant and cannot be varied on the basis of a new SHMA. The proportion of new homes built to this standard must be set out in policy and if they need to be amended should only be through a review of the local plan and subject to the correct process and scrutiny. Secondly, paragraph 14.25 states that 10% of market housing should be built to M4(3). This is inconsistent with PPG which states at paragraph 56-009: "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."

Change To Plan: The requirement for all homes to be built to part M4(2) be substantially reduced
 The requirement for market homes to be built to part M4(3) be deleted from paragraph 14.24
 Any requirement for affordable homes to be built for part M4(3) be included within the policy and the final sentence of the second paragraph of policy H5 be deleted.

Full Reference: O - 6705 - 8450 - H5 Accessible and Adaptable Housing - None

6745 Object**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: In considering whether to implement the optional technical standards on accessibility PPG sets out in paragraph 56-007 that local planning authorities must take into account the likely future needs for such homes, the type of homes needed to meet evidenced need, the accessibility of existing stock, how needs vary and the overall impact on viability.

It is not an appropriate interpretation of Government policy that all new homes should be built to their higher optional standard. If this was the Government's intention, it would have made these standards mandatory.

We agree with the HBF that the Council's limited evidence solely reflects national concerns regarding an ageing population and as such provides no unique or local circumstances that warrant all new homes to be built to Part M4(2). Whilst there may be a need for some new homes to be built to M4(2) the evidence does not show that there is a need for all the new homes to be built to this standard.

With regard to Part M4(3) the Council indicates within the policy that a proportion of all homes on major development sites should be built to part M4(3) on the basis of the proportion set out in the latest SHMA. We agree with the HBF that the impact of this standard on the cost of delivering new homes is significant and cannot be varied on the basis of a new SHMA. The proportion of new homes built to this standard must be set out in policy and if they need to be amended should only be through a review of the local plan and subject to the correct process and scrutiny.

Paragraph 14.25 states that 10% of market housing should be built to M4(3). This is inconsistent with PPG which states at paragraph 56-009:

"Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."

Change To Plan: The requirement for all homes to be built to part M4(2) be substantially reduced

* The requirement for market homes to be built to part M4(3) be deleted from paragraph 14.24

* Any requirement for affordable homes to be built for part M4(3) be included within the policy and the final sentence of the second paragraph of policy H5 be deleted.

Full Reference: O - 6745 - 8437 - H5 Accessible and Adaptable Housing - None

913

6857 Object**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The Policy should be supported by sufficient evidence to justify each of the standards, with adequate flexibility to take account of site specific circumstances, viability and in particular the need for all apartment buildings to comply with the accessibility standards. We object to these prescriptive requirements as it constitutes an unreasonable and inflexible approach which would not be 'Justified', 'Effective', or 'Consistent with National Policy' and is therefore not 'Sound'.

Change To Plan: Policy H5 implies that a quantum of market housing is also required to comply with Part M4(3). This would not be 'Consistent with National Policy' and therefore the requirement should be removed.

Full Reference: O - 6857 - 8640 - H5 Accessible and Adaptable Housing - None

6866 Object**Respondent: De Merke Estates (Ms Emma Gladwin) [8643]****Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: HDC has not published any evidence relating to these requirements, which place considerable requirements and restrictions on developers, including the requirement to have level thresholds which is not always achievable.

As the definition of major developments includes the provision of 10 or more dwellings, these requirements could have significant implications for small to medium sized sites and could restrict delivery of smaller sites.

Change To Plan: HDC does not appear to have considered the implications of such standards, which could have a detrimental impact on delivery rates and viability. As such, Policy H5 is not currently justified.

Full Reference: O - 6866 - 8643 - H5 Accessible and Adaptable Housing - None

6632 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Policy H5 sets out that all new housing developments should meet Building Regulations Standard M4(2). The Written Ministerial Statement of 25th March 2015 confirms that the optional new national technical standards should only be required through Local Plans if they address a clearly evidenced need and where the impact on viability has been considered. It is therefore important that the Council has undertaken a local assessment which evidences the need for the adoption of Building Regulation Standard M4(2). The Council do not seem to have undertaken such an assessment.

Change To Plan:

Full Reference: C - 6632 - 8618 - H5 Accessible and Adaptable Housing - None

6910 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC notes and supports in principle that the policy states that:
'The provision of specialist housing developments will be supported on appropriate sites that will meet the needs of older people and other groups.'

However, this makes no reference to the scale of the need involved or any specific means to address this. The evidence position is that ECC assessed a need for 2,825 Independent Living units (available as rental or ownership units) to be delivered by 2020 in the County. In September 2016 ECC assessed a need with Harlow for 150 units to be provided by 2020. The ECC Independent Living programme has been developed by ECC to increase the supply of Independent Living units across Essex.

Change To Plan: ECC recommends addition of reference to this evidential position on scale of need to provide for local needs

This would ideally be referenced within the policy itself (as part of its requirements) and the supporting text (paragraphs 14.23 - 14.27).

Full Reference: C - 6910 - 8452 - H5 Accessible and Adaptable Housing - None

6594 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: This proposed policy also sets out the preferred Market Housing mix, again drawn from the SHMA 2015. Unlike the Affordable Housing requirement, this mix has not been re-visited and is now considered to be out of date.

Developers are invariably best placed to understand the most up to date position in the housing market, particularly on larger schemes, where careful consideration has to be given to sales rates to ensure the delivery of the site is viable. The need to be up to date is essential and will always be reflective of the market at the time of the application, as opposed to the SHMA, which is already three years out of date.

Change To Plan: It is strongly recommended that housing mix be left to the developer to ascertain what is required locally and will therefore sell. Dictating, particularly market housing mix, will deter developers from the District as they will not wish to invest and develop sites that they will then struggle to sell. This is likely to impact on the Local Planning Authority's ability to deliver their five-year housing land supply.

Full Reference: O - 6594 - 8451 - H6 Housing Mix - None

6706 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: Whilst we recognise that the Council will require a range of different types and tenures of housing to be provided within the Borough, it is essential that any policy allows for sufficient flexibility on the basis of both the viability of delivering the Council's required mix of housing. At present the Council will require a very specific mix of development on the basis of figure 14.1 in the local plan. Whilst the viability study concludes that the local plan is broadly viable it does recognise that for more mixed developments viability is not as strong. Whilst this largely relates to the impacts of flatted developments it does show that housing mix can impact significantly on the viability of a development. The NPPF is clear that plans should be viable (paragraph 173) and flexible (paragraph 14) and at present we do not consider this policy to be consistent with these two aims. In order to ensure that this policy is sound it needs to be less rigid in the housing mix required and made more flexible and allow for viability concerns to be considered when agreeing the appropriate mix of housing on any site.

Change To Plan: The policy be amended to read:
"The Council will seek a range of housing types and sizes, across a range of tenures, on all major residential sites that will reflect the needs of the Borough any site specific concerns regarding viability and feasibility."

Full Reference: O - 6706 - 8450 - H6 Housing Mix - None

6746 Object **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: We share the HBF's concerns regarding the overly prescriptive nature of Policy H6. The NPPF is clear that plans should be viable (paragraph 173) and flexible (paragraph 14) and at present we do not consider this policy to be consistent with these two aims. In order to ensure that this policy is sound it needs to be less rigid in the housing mix required and made more flexible and allow for viability to be considered when agreeing the appropriate mix of housing on any site.

Change To Plan: The policy be amended to read:

"The Council will seek a range of housing types and sizes, across a range of tenures, on all major residential sites that will reflect the needs of the Borough any site specific concerns regarding viability and feasibility."

Full Reference: O - 6746 - 8437 - H6 Housing Mix - None

6485 Comment**Respondent: Miller Strategic Land [5769]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Policy H6 seeks a range of housing types and sizes, across a range of tenures. Below the policy, Figure 14.1 sets out specific percentages for 1-5 bedroom properties, in both market and affordable tenures, based on the SHMA.

However, it should be noted that the residential-led development at East Harlow is likely to involve a 10+ year delivery programme. As a result, housing needs will inevitably vary during this period and HDC will need to offer some flexibility in how it applies the housing mix presented at Figure 14.1, based on the latest evidence at the time.

Change To Plan:

Full Reference: C - 6485 - 5769 - H6 Housing Mix - None

6758 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Paragraph 14.30 states with regard to housing type and mix that "The range of housing types, sizes and tenures is based on the current SHMA (see Fig. 14.1) or successor studies". It is however noted that subsequent to this, paragraph 14.41 includes some flexibility for Garden Towns, "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."

Change To Plan: For clarity, it is suggested that Paragraph 14.30 is updated to include the following:
 "...or successor studies, taking account of the latest Strategic Housing Market Assessment and any additional up-to-date evidence, local demographic context and trends; local housing need and demand; and site issues and design considerations."

Full Reference: C - 6758 - 7958 - H6 Housing Mix - None

6858 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The 2015 SHMA identifies a housing mix at Figure 76; however, at paragraph 5.94 the SHMA states that the spatial distribution, appropriate locations for market and affordable housing, type and size of properties to be provided in different areas will be determined through the planning process. The standardised approach to applying the prescriptive mix across all sites fails to address more localised needs and demands, which may not align with the District wide mix and reduce the ability for the Plan to respond to changing circumstances and market conditions.

Change To Plan: The requirement to provide a housing mix compliant with the 2015 SHMA should therefore be removed because it is not 'Consistent with National Policy', as it fails to respond flexibly to changing circumstances (NPPF, Para 153).

Full Reference: C - 6858 - 8640 - H6 Housing Mix - None

6486 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client wishes to raise a holding objection to Policy H8 on the basis that the requirement for 30% affordable housing is not yet based on proportionate evidence (i.e. it is not "justified").

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6486 - 5769 - H8 Affordable Housing - ii

6707 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The affordable housing policy is unsound on the basis that it is ineffective and not consistent with national policy. We consider the policy H8 to be unsound as it sets out a minimum level of affordable housing that the Council expects and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF. In setting out this target as a minimum the Council are creating unnecessary uncertainty for the house building industry. Developers should be able to cost schemes with a high degree of predictability and this policy does not support this position. At present this policy could be considered to be the starting point of a negotiation and that the Council will seek higher contributions.

Change To Plan: In order to make this policy sound we would recommend that the words "at least" be removed from the policy.

Full Reference: O - 6707 - 8450 - H8 Affordable Housing - None

6597 Comment

Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]

Agent: N/A

Summary: The need for 30% affordable housing to be provided on all major residential sites is however contrary to National Planning Policy Guidance. For the purposes of affordable housing provision, there is a distinct difference drawn between the Town and Country Planning (Development Management Procedure)(England) Order 2015 definition of major development and Government guidance on the 10-unit threshold, which requires affordable housing only to be provided on schemes of 11 units or more. The policy should be amended to reflect the NPPG.

Change To Plan: The policy should be amended to reflect all potential affordable housing types as set out within the draft NPPF and allow for flexibility should the definition be again varied in the future, thus ensuring the plan policy has longevity and remains sustainable. In its current form this policy is considered to be unsound.

Full Reference: C - 6597 - 8451 - H8 Affordable Housing - None

6747 Comment

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: We agree with the HBF that Policy H8 is unsound as it sets out a minimum level of affordable housing that the Council expects and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF. The development industry needs to be able to consider the cost schemes with a high degree of predictability and this policy does not enable this to happen.

Change To Plan: In order to make this policy sound we would recommend that the words "at least" be removed from the policy.

Full Reference: C - 6747 - 8437 - H8 Affordable Housing - None

6768 Comment**Respondent: Tetlow King Planning (MEGHAN ROSSITER) [8630]****Agent: N/A**

Summary: Policy H8 is a very succinct policy on affordable housing, providing little direction on the Council's tenure or type mix expectations. While the minimum figure of 30% affordable housing on all major residential development provides a strong indication of the Council's requirement, it does not address the potential for higher levels to be delivered in the new Garden Communities, nor for lower levels on smaller developments. Setting zone-specific targets helps to increase the overall level of affordable housing, as well as targeting those areas where a different mix of affordable housing tenures can be delivered. We suggest, in light of the proposed NPPF2 definition of affordable housing, that the policy make explicit reference to the need for a diverse range of affordable housing to be delivered across Harlow, including social and affordable rent, intermediate affordable and affordable rent to buy. We recommend the policy be reworked to include more specific targets for the allocated housing sites, with a paragraph setting out the expectation that developments deliver a range of affordable housing tenures, including those aimed at assisting people into home ownership.

By wording the policy in this way, developments will be encouraged to come forward with a greater diversity of tenures that reflect not only priority needs, but those needs not currently met by the delivery of social, affordable rent, and intermediate affordable tenures. Leaving this expectation for the implementation paragraphs following the policy fails to reflect the Council's ambitions to meet affordable housing needs, and to properly target areas with the greatest scope for high delivery.

Change To Plan: As the Council is a landowner with interest in bringing forward some of the allocated development sites, this Plan should be as ambitious as possible to maximise affordable housing delivery.

Full Reference: C - 6768 - 8630 - H8 Affordable Housing - None

6487 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client recommends that HDC adopts a similar approach to that used by its neighbours at EHDC, who agreed at EiP to reduce the proportion of plots dedicated to self-build from 5% to 1%.

Change To Plan: Our client respectfully requests that the first paragraph in Policy H9 is amended to read:
"Development of housing sites greater than 50 dwellings must include 1% of serviced plots for self-build..."

Full Reference: O - 6487 - 5769 - H9 Self-build and Custom-build Housing - ii

6708 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: This policy is unsound as it has not been justified and is inconsistent with national policy
Whilst we support the encouragement of self-build housing through the local plan we do not consider the requirement for sites of over 50 to provide up to 5% service plots for self and custom house building to be justified or consistent with national policy.
Firstly, we could find no analysis as to how many homes are likely to be required based on the self-build register in order to justify the proportions set out in the policy. Based on the allocations to be made in the plan this would deliver around 170 self-build plots however, it is not clear whether this will meet needs or be a significant over provision. Secondly, whilst we recognise that Local Planning Authorities now have a duty to promote self-build housing we do not consider the Council to have looked at sufficient options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered - including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We cannot find any evidence as to the Council's consideration of other reasonable approaches to delivery as suggested in PPG. Without such consideration it would appear that the Council is seeking to place the burden for delivery of self-build plots on larger sites without looking sufficiently at other delivery mechanisms as set out in national guidance. We also consider the policy to be inconsistent with the third bullet point of paragraph 57-025 of PPG. This outlines that the Council should engage with landowners and encourage them to consider self-build and custom house building. The approach taken by the Council moves beyond encouragement and requires land owners to bring forward plots.

Change To Plan: That the policy be deleted and replaced with a policy that seeks to encourage the provision of self-build plots.

Full Reference: O - 6708 - 8450 - H9 Self-build and Custom-build Housing - None

6748 Object **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: The requirement for sites of over 50 to provide up to 5% service plots for self and custom house building is not justified or consistent with national policy.

The Council's evidence base does not contain an analysis as to how many homes are required based on the self-build register in order to justify the proportions set out in the policy.

We agree with the HBF that the Council needs to examine the options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered - including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. As detailed by the HBF, the Council does not appear to have provided evidence of the consideration of other reasonable approaches to delivery as suggested in PPG.

Change To Plan: That the policy be deleted and replaced with a policy that seeks to encourage the provision of self-build plots.

Full Reference: O - 6748 - 8437 - H9 Self-build and Custom-build Housing - None

6759 Object**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Policy H9 Self-build and Custom-build Housing sets out that "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". The Plan also makes provision for conversion of the serviced plots to other forms of tenure in the event that uptake by the market is subdued.
There is a significant variance between this and the emerging East Herts District Plan Policy HOU8 Self-Build and Custom Build Housing, which only requires one percent of dwelling plots on sites of more than 200 dwellings.

Change To Plan: It would be appropriate for a reduction to 1% on sites over 200 dwellings which would still generate a significant and deliverable quantum of self/custom build plots.

Full Reference: O - 6759 - 7958 - H9 Self-build and Custom-build Housing - None

6633 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Policy H9 requires housing developments providing 10 dwellings or more to provide land for self-build and custom build dwellings to help meet identified local demand. Whilst the concept of Self Build and Custom Build Housing is supported, Gladman has concerns regarding Policy H9 as it is written. The inclusion of plots on large scale sites does not add to the supply of houses overall (it merely changes the housing mix from one product to another). It is also difficult to assess how it will be implemented given issues around working hours, site access, health and safety etc. that are associated with large scale development sites. The percentage of provision on sites should also be determined on detailed evidence of need which the Council appears not to have produced and the provision of these plots should also be subject to viability testing.

Change To Plan:

Full Reference: C - 6633 - 8618 - H9 Self-build and Custom-build Housing - None

6859 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The Council has published its SHMA (2015) as part of its evidence base to support the Local Plan consultation. Paragraph 6.43 states that a survey to ascertain levels of demand for self-build could be undertaken in the future. As such, the Council has not produced any robust evidence of the need for self-build and this requirement has not been assessed as part of the Council's SHMA. The Council has also not published any information about the number of people on the Council's Self Build Register.

As a consequence, the Council has not provided any evidence in respect of the specific need for self-build housing in Harlow over the Plan Period to justify the 5% requirement. Policy H9 has therefore not been 'Positively Prepared', 'Justified' or 'Consistent with National Policy'.

Change To Plan: The policy should be deleted.

Full Reference: C - 6859 - 8640 - H9 Self-build and Custom-build Housing - None

**CHAPTER: DEVELOPMENT
MANAGEMENT****H10 Travellers' Pitches and Plots****6728 Comment****Respondent: National Federation of Gypsy Liaison Groups (A. Yarwood) [8627]****Agent: N/A**

Summary: The requirement that evidence of need is a pre-requirement is unacceptable and renders the policy non-compliant with the guidance set out in DCLG's Planning Policy for Traveller Sites (PPTS). Paragraph 10 of PPTS requires that Local Plans set out criteria for dealing with applications even where no need has been identified. Thus the Plan is unsound and the reference to evidence of need should be deleted. Furthermore criteria (i) is incompatible with the statement supporting policy HS4 which recognises that provision needs to be made for Gypsies who do not meet the definition.

Change To Plan:

Full Reference: C - 6728 - 8627 - H10 Travellers' Pitches and Plots - None

920

CHAPTER: DEVELOPMENT
MANAGEMENT

H10 Implementation

6505 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We welcome the inclusion of the policy that new pitches and plots must not pose risk of land contamination or flooding. This policy could be strengthened further in the implementation section by referring to the sequential test for site allocations and cross referencing with policy PL10.

Change To Plan:

Full Reference: C - 6505 - 8443 - H10 Implementation - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR1 Development within Employment Areas

6560 Comment

Respondent: BOC (Glen Jenkins) [8571]

Agent: N/A

Summary: (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 for example by the introduction of a noise sensitive occupier;

Change To Plan: (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 for example by the introduction of a noise sensitive occupier;

Full Reference: C - 6560 - 8571 - PR1 Development within Employment Areas - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas

6564 Comment

Respondent: BOC (Glen Jenkins) [8571]

Agent: N/A

Summary: Add the following to PR3

(d) the proposed use would not have an adverse effect on the overall provision of employment land, for example by the introduction of a noise sensitive occupier

Change To Plan: Add the following to PR3

(d) the proposed use would not have an adverse effect on the overall provision of employment land, for example by the introduction of a noise sensitive occupier

Full Reference: C - 6564 - 8571 - PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR4 Improving Job Access and Training

6488 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Although our client supports the principle behind this policy, i.e. to get local residents back into work and to improve their skills level, additional information is required: to explain how these obligations could work in reality; to set out the level of obligation likely to be sought; and, to assess the viability implications of these requirements.

Change To Plan: Our client respectfully requests that part (1) in Policy PR4 is deleted and further evidence is presented to justify the inclusion of parts (2) to (4)

Full Reference: O - 6488 - 5769 - PR4 Improving Job Access and Training - ii

921

6773 Comment **Respondent: Indigo Planning Limited (Mr Diogo Duraes) [8632]** **Agent: N/A**

Summary: Proposed Policy PR5 suggests the requirement for an impact assessment to be submitted with proposals of more than 500 sq m on sites outside town centres. We consider that the threshold should be increased to bring it in line with the NPPF threshold (paragraph 26).

Change To Plan:

Full Reference: C - 6773 - 8632 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

6774 Object **Respondent: Indigo Planning Limited (Mr Diogo Duraes) [8632]** **Agent: N/A**

Summary: Proposed Policy PR7 states that the sub-division of retail units in the town centre must (for units of 2,500 sqm or more) provide two years' worth of marketing evidence. Two years' worth of evidence is an unreasonable requirement and could result in a unit being vacant for up to two years whilst the evidence is gathered thus harming the vitality and viability of the town centre. This requirement will put businesses under more pressure, preventing them from using their retail floorspace flexibly and ensuring it can be occupied.

Change To Plan: this policy requirement should be removed.

Full Reference: O - 6774 - 8632 - PR7 Sub-division and Internal Alteration of Town Centre Units - None

6452 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: Does Lifestyle need a section on green issues eg efficient energy use? Sustainable development refers to a clean and green environment. Does more work need to be done so as to ensure that there is a real focus on this, one which combines with a priority for local development. Though there is the presumption, unless this is fleshed out there is danger that this would easily be ignored.

Change To Plan:

Full Reference: C - 6452 - 8586 - 16. LIFESTYLES - None

6911 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: This chapter on Lifestyles addresses provision / access to open space, recreation and sports facilities - but does not reference broader healthy / active lifestyles and behaviours and the need to enable and promote these. This needs to make clear how the Plan strategy and actions will address the needs of current and future local populations.

These things mean that the NPPF requirements around Health and Wellbeing (NPPF, paragraphs 70 and 171) are not currently met.

Change To Plan: ECC (Public Health) recommends that this section is reviewed comprehensively to build upon its existing content that provides a useful, initial basis for the active lifestyles element of health and wellbeing.

ECC will review appropriate Local Plan content and suggestions used elsewhere and recommends early joint working with HC to agree the form of content and new approaches to include

Full Reference: C - 6911 - 8452 - 16. LIFESTYLES - None

6599 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: It is considered that this policy lacks a robust evidence base to ensure developments deliver facilities that meet a demonstrable need. The content of the policy should be revisited to enable a more appropriate and flexible approach to be taken to provision of open space and sports facilities etc, to enable improved facilities to be provided, as well as meeting a demonstrable need.

Change To Plan:

Full Reference: O - 6599 - 8451 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6867 Comment **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: Policy L1 states that in major development public open space and play space are required, with allotments and sporting provision and facilities required where appropriate. This is not always achievable in smaller sites, particularly if a scheme just falls within the definition of major development.

Change To Plan: Policy L1 should be amended to require public open space and play space where appropriate. This is further pertinent given that HDC is proposing the loss of public open space and play space for housing allocations. These sites are all owned by HDC, with HDC potentially significantly profiting from the loss of open space with developers currently required to subsequently make up the shortfall.

Full Reference: C - 6867 - 8643 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6463 Support **Respondent: The Theatres Trust (Tom Clarke) [216]** **Agent: N/A**

Summary: As set out in our representation at the previous stage, the Trust welcomes this policy and the protection it will afford to Harlow's valued local facilities.

Change To Plan:

Full Reference: S - 6463 - 216 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6454 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the reference to places of worship under L2 (Lifestyle Implementation). Could there be a specific reference somewhere to s106 monies being available for local including adjoining community etc activities. Could there also be a reference to places of worship under 4.20? Thus would reflect the original vision of the Master Plan for Harlow.

Change To Plan:

Full Reference: C - 6454 - 8586 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6464 Comment

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: Although we support the policy, we consider it could be strengthened by setting out criteria by which proposals for the loss of facilities will be assessed. We would recommend this to include evidence of marketing for an appropriate period (at least one year) at a rent/sale price appropriate to the condition and existing use of the facility, and that it has been marketed through appropriate channels relevant to the nature of the facility.

Change To Plan:

Full Reference: C - 6464 - 216 - L2 Implementation - None

6489 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: If HDC is minded to retain Policy L3 in the Local Plan, it should prepare and present evidence to demonstrate where there are public art deficiencies in the Town, how those deficiencies should be addressed and the level of contribution / obligation likely to be necessary to do so.
Change To Plan: Our client respectfully requests that part (1) in Policy L3 is deleted.

Full Reference: O - 6489 - 5769 - L3 Development Involving the Provision or Relocation or Loss of Public Art - ii, iv

6709 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**
Summary: Part 1 of this policy is unsound as it is unjustified and inconsistent with national policy
Planning Practice Guidance sets out the situation with regard to existing legislation on planning obligations. In particular it states that:
"Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind" (Ref: 23b-001-20161116).
The Council have not established within the plan or the supporting evidence base how it considers public art to meet any of these tests. Whilst we recognise that public art can play a role in making interesting and exciting public spaces if the Council is to require all major developments to have public art it must have evidence to show how this policy meets the required tests in relation to all such sites.
Change To Plan: Part of this policy should be deleted

Full Reference: O - 6709 - 8450 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6868 Object **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**
Summary: The justification for this is to continue the legacy of Harlow as a town of public art and sculpture. However, there is no consideration regarding the viability impact that this may have, particularly on smaller sites.
Policy L3 is not currently justified or consistent with national policy, with Paragraph 174 of the NPPF stating Councils should assess the likely cumulative impacts of proposed local standards on new developments. HDC has not done this
Change To Plan: Policy L3 should be amended to require public art where appropriate to be meet the tests of 'soundness'.

Full Reference: O - 6868 - 8643 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6455 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**
Summary: I welcome the focus on the provision of local art.
Change To Plan:

Full Reference: S - 6455 - 8586 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6912 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**
Summary: ECC notes that Public Art is an important part of Harlow's historic environment and not all of it is protected by national designation. As such a clause should be added stating that the loss of public art will only be permitted where it can be demonstrated that the loss will not cause harm to the historic significance of the art work or its setting.
Change To Plan: Revise and strengthen Policy L3 (2) by adding a clause stating that the loss of public art will only be permitted where it can be demonstrated that the loss will not cause harm to the historic significance of the art work or its setting.

Full Reference: C - 6912 - 8452 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6674 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: Paragraph 17.4. HCC has the equivalent documentation that is listed within this paragraph. This applies to the development within Herts (ie Gilston) and therefore its plan should also be considered where relevant.

Paragraph 17.10 should be amended, as shown below, to reflect both HCC and Essex County Council (ECC) as Local Highway Authorities, as the developments within Harlow are linked to the proposed Gilston Area in East Herts District.

Change To Plan:

Full Reference: C - 6674 - 8622 - 17. INFRASTRUCTURE - None

6749 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: The Policy states; 'Development must provide electric vehicle charging points (EVCPs) in accordance with the latest government guidance'. It is not clear what government guidance is being referred to. Policy IN1 is unsound as it refers to an unspecified standard that could be amended and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF.

The impact of a (unspecified) standard on the cost of delivering new homes could be significant and should not be varied on the basis of unspecified future guidance. If necessary, the standard must be set out in policy and if they need to be amended should only be done so through a review of the local plan.

Change To Plan: That the policy be deleted and replaced with a policy that specifies a standard that has been fully accounted for within viability assessments and that should only be sought where practicable.

Full Reference: O - 6749 - 8437 - IN1 Development and Sustainable Modes of Travel - None

6869 Object

Respondent: De Merke Estates (Ms Emma Gladwin) [8643]

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: there is no Government guidance that sets standards or requirements for such charging points

Change To Plan: Policy IN1 is therefore not justified and should be removed.

Full Reference: O - 6869 - 8643 - IN1 Development and Sustainable Modes of Travel - None

6578 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: Waterway corridors provide an ideal environment for sustainable active travel and we welcome reference in Policy IN1 to new development being required to link with and where appropriate improve the existing network of cycleways and paths. The list of routes identified in Policy IN1 could however usefully be expanded to include reference to towpaths to provide clarity on this matter.

The River Stort provides a flat, direct and easy to access route for walking and cycling and close links with the rail network in the Harlow area mean that the towpath can easily be used for the first/last mile of journeys and have a positive impact on congestion as well as the health and wellbeing of local people.

Improved access and relatively simple improvements to the towpath can have a big impact on people's propensity to use it as part of their daily routine.

Whilst Policy IN1 refers to new development contributing to the improvement and development of routes, such reference is missing within the justification of the policy.

The Trusts therefore consider that more emphasis could be placed on the benefits of upgrading existing infrastructure and access to it to support active travel within the policy justification

Change To Plan:

Full Reference: C - 6578 - 8612 - IN1 Development and Sustainable Modes of Travel - None

6661 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: 1. Sustainable Accessibility is lacking in public transport requirements or links to sustainable transport corridors and does not go far enough to enable real mode shift. The justification of this policy appears lacking and outdated in providing an understanding of how crucial a significant increase to sustainable transport is required within Harlow. Whilst some sections of the justification are encouraging, this does not seem to have been followed through into the policy wording, the result is a poor policy. It is also considered that this policy would not go far enough in supporting policy HGT1 nor the wider objectives set out within the plan. Policy HGT1, Section i states: "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 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."
HCC fully support the intention of the Local Plan to enable significant mode shift, However, the Highway Authority is concerned with the strength and depth of part 1 of Policy IN1.

Change To Plan:

Full Reference: C - 6661 - 8622 - IN1 Development and Sustainable Modes of Travel - None

6860 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: Policy IN1 relates to the need to incorporate sustainable methods of travel within all development proposals. In particular, Part 2 of the Policy requires the provision of Electric Vehicle Charging Points in accordance with latest government guidance. The consultation draft of the NPPF refers to the planning system being required to support the transition to a low carbon future and support renewable and low carbon energy and associated infrastructure (Paragraph 147). However, the NPPF (2018) makes no direct reference to electric vehicle charging points nor does it set a required standard. Further, the Council has not undertaken an assessment of viability to consider the impact of the imposition of any standards upon development viability.

Paragraphs 157 and 177 of the NPPF (2012) require Local Plans to plan positively for infrastructure needs throughout the Plan Period. The Council has not undertaken any form of assessment as to the need for infrastructure upgrades (which may be wider than the Site) associated with additional demand upon the National Grid.

Change To Plan: It is our experience that the installation of such infrastructure may require reinforcement of the existing electrical network to accommodate additional demand. National Grid require sufficient supply to be made for all households to return home at the same time and plug in their vehicles. In circumstances where there is insufficient supply, developers are required to pay to reinforce electricity supplies which is an extremely costly exercise and can lead to delays in the delivery of housing.

Policy IN1 has therefore not been 'positively prepared' and is not 'justified' or 'consistent with National Policy' and is therefore not 'Sound'. The Policy should therefore be deleted.

Full Reference: C - 6860 - 8640 - IN1 Development and Sustainable Modes of Travel - None

6913 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Policy IN1 Sustainable Accessibility does not mention any requirements to link to or provide public transport services. Suggest amendments are made to include this, particularly as the following supporting text refers to trains and buses and public transport.

Change To Plan: ECC (Highways) recommends that a requirement is added to Policy SIR1 to cover this gap:

'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, the existing cycleway, footway, public right of way and bridleway network, and, where appropriate.'

Full Reference: C - 6913 - 8452 - IN1 Development and Sustainable Modes of Travel - None

6914 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: The thrust of this section is welcomed but this could usefully go further in scope and coverage.

Travel Plans are referred to, but it is recommended that the potential for wider Travel Planning co-ordination is referenced to enable more effective encouragement of mode shift of existing and new residents and workers.

The Local Plan does not mention the need for behavioural change in order to achieve sustainable travel/step-change. This is considered very important in order to influence travel choices and achieve more sustainable travel

Change To Plan: ECC (Highways) recommends that a reference is added to the potential for wider Travel Planning co-ordination.

Also add a reference to the need for behavioural change (reason: in order to achieve sustainable travel/step-change).

The latter reference could be in the preceding 'Justification' section at paragraphs 17.9 - 17.11.

Full Reference: C - 6914 - 8452 - IN1 Implementation - None

6490 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Policy IN2 confirms that development will be supported where it meets a number of highway network related criteria, including that it should not cause a "significant" detrimental impact on highway congestion and movement.

However, the corresponding test at paragraph 32 of the NPPF states that development should only be refused on transport grounds where the residual cumulative impacts of development are "severe".

Therefore to be consistent with national policy, part (a) in Policy IN2 should be amended to refer to "severe" impacts.

Change To Plan: Our client respectfully requests that part (a) of Policy IN2 is amended to read: "it would not cause a severe detrimental impact on highway congestion and movement;".

Full Reference: O - 6490 - 5769 - IN2 Impact of Development on the Highways Network including Access and Servicing - iv

6861 Comment

Respondent: Redrow Homes (Ms Kate Holland) [8640]

Agent: Redrow Homes (Ms Kate Holland) [8640]

Summary: Paragraph 32 of the NPPF requires all developments that generate significant amounts of vehicular movements to be supported by a Transport Statement or Assessment. Plans and decisions should

take account of whether safe and suitable access to the site can be achieved by all people (bullet 2). Further, bullet point 3 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The policy requirement contained within Policy IN2 is therefore a much higher test than that set out within the NPPF Paragraph 32 which sets a severity test. The Policy is therefore not 'consistent with National Policy' and therefore cannot be considered 'Sound'.

Change To Plan:

Full Reference: C - 6861 - 8640 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6710 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

The Council does not set out in this policy, or elsewhere in the local plan, what is required by an applicant with regard to the actual parking standards. The approach taken by the Council is therefore unsound for two reasons. Firstly it does not comply with legislation that prevents the Council from setting policy in supplementary planning documents, or any other guidance document, which cannot be challenged through an Examination in Public. This principal was most recently tackled in William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017) where supplementary planning document strayed into an area that should be considered by a development plan document. This decision quashed an SPD that contained policies that clearly encouraged and imposed development management policies against which a development could be refused. Policy can only be established through the Local Plan.

Change To Plan: Parking standards should be included within the local plan and reference to the Essex Vehicle Parking Standards should be removed.

Full Reference: O - 6710 - 8450 - IN3 Parking Standards - None

6662 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: As commented on, HCC are concerned that the wording of Policy IN3: Parking Standards would not enable the Local Plan to restrict parking in favour of sustainable transport provision. There is also concern that the policy is incongruent with Objective 13.

There is concern that this approach to parking would be open to be interpretation, and would not enable effective parking restriction at sustainable locations as proposed within supporting text of the local plan.

Moving Forward

HCC as Highway Authority does not consider the plan to be unsound. However, modifications could be made to ensure that the deliverability of the required mode shift is achievable and supported by policy, as there is concern that failure to deliver this will have wider impacts on HCC's transport network.

The Highway Authority remains committed to a close working relationship supporting the delivery of the Harlow Local Plan and the Harlow and Gilston Garden Towns.

Change To Plan:

Full Reference: C - 6662 - 8622 - IN3 Parking Standards - None

6675 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: Parking Standards. It should be noted that Essex vehicle parking standards would not apply to development in Hertfordshire ie the Gilston Area.

Change To Plan:

Full Reference: C - 6675 - 8622 - IN3 Parking Standards - None

6711 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound because they are unjustified and contrary to national policy.

Following the Government's Housing Standards Review, the Written Ministerial Statement of 25 March 2015 announced that local planning authorities preparing Local Plans "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings". In terms of the construction, internal layout and performance of new dwellings local planning authorities are only allowed to adopt the three optional technical standards, subject to evidence of need and viability. Council's should not seek higher standards than Building Regulations on any other technical standard - including Part R1 Physical infrastructure for high speed electronic communications networks.

Change To Plan: The policy should be deleted.

Full Reference: O - 6711 - 8450 - IN4 Broadband and Development - None

6750 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: We agree with the HBF that following the Government's Housing Standards Review, the Written Ministerial Statement of 25 March 2015 announced that local planning authorities preparing Local Plans "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings".

In terms of the construction, internal layout and performance of new dwellings local planning authorities are only allowed to adopt the three optional technical standards, subject to evidence of need and viability. Council's should not seek higher standards than Building Regulations on any other technical standard - including Part R1 Physical infrastructure for high speed electronic communications networks.

Change To Plan: The policy should be deleted.

Full Reference: O - 6750 - 8437 - IN4 Broadband and Development - None

6491 Comment

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the objective in Policy IN4 to provide infrastructure suitable to enable the delivery of high-speed broadband services in all major development across the Harlow area.

However, for the avoidance of doubt, it is only the master developer's role to facilitate delivery by providing conduits and other infrastructure - not to provide or ensure that all new dwellings actively take up such a service.

Change To Plan:

Full Reference: C - 6491 - 5769 - IN4 Broadband and Development - None

6579 Support

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: The Trust notes and welcomes policy IN6 which recognises the impact new development can have on local infrastructure and the need to mitigate any adverse impacts. Development in the vicinity of our waterways can increase the number of users which, whilst generally welcomed, may require existing towpaths to be upgraded or significantly increase on going liabilities for the Trust. We note that the council is intending to produce a Planning Obligations SPD and would welcome the opportunity to comment further on this.

Change To Plan:

Full Reference: S - 6579 - 8612 - IN6 Planning Obligations - None

6741 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy. We note that this policy sets out the requirement to provide for 'environmental protection' but advises that 'net gains' for the environment should also be provided by this policy. We note from paragraph that Green Infrastructure, Biodiversity and Wildlife Habitats are considered to fall under the bracket of 'Infrastructure' but feel the policy would benefit from explicit inclusion of environmental enhancement alongside 'protection'.

Change To Plan:

Full Reference: C - 6741 - 8628 - IN6 Planning Obligations - None

6760 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: Policy IN6 explains that "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". The justification for this is that '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.'
In accordance with the aspirations set out in Policy HGT1 criteria 2n, P&P consider that Harlow requires a robust mechanism for securing planning obligations from new developments coming forward in and around Harlow. It is suggested that pro rata contributions be sought from all developments forming the 16,100 dwellings within the Harlow and Gilston Garden Town that are not currently committed or that consideration be given to the introduction of the Community Infrastructure Levy to more fairly secure contributions from all new development that will benefit from the infrastructure identified in the IDP.
At Paragraph 17.40 there is generic referencing to planning obligations capturing contributions towards transport improvements, and to impacts across border. Harlow should be more explicit about how this will be achieved and make clear that the contributions are to be used to deliver the infrastructure identified in the IDP.

Change To Plan:

Full Reference: C - 6760 - 7958 - IN6 Planning Obligations - None

6915 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that it has concerns that adequate policies are not currently included in the plan to govern the full range of required infrastructure contributions. Further content is considered necessary to ensure that the policy approach is sufficiently comprehensive in its scope and its requirements. Accordingly, ECC recommends (as previously through the Development Management Policies consultation) that proposed Policy IN6 is replaced with ECC's recommended policy.

Change To Plan: ECC recommends replacing Policy IN6 with ECC's recommended policy - see Appendix 1A for the full text of this.

Reference to ECC's Developers' Guide to Infrastructure Contributions should also be included as part of the supporting text (paragraphs 17.34 - 17.40 refer) to assist in implementation.

Full Reference: C - 6915 - 8452 - IN6 Planning Obligations - None

6676 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: New transport infrastructure/provision (including that for sustainable modes) should also be listed within this paragraph, in addition to that of transport improvements, which is already listed.

Paragraph 17.37. It is suggested that the following wording is added at the end of this paragraph, as development may extend beyond the district boundary:
"...or relevant authority for the land on which the site is situated"

Change To Plan:

Full Reference: C - 6676 - 8622 - IN6 Implementation - None

6916 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: No indicators or targets have been set with regard to sustainable travel / modal shift, or sustainable travel corridor provision/success. This is a key element, as a step-change in travel mode is required in order to deliver a sustainable garden town and to minimise impact on the highway network.

Change To Plan: ECC (Highways) recommends that, as part of wider transport joint working and support for HC, a constructive dialogue is continued on transport matters to support the Local Plan. This would include joint consideration and development of appropriate transport indicators that meet 'SMART' requirements. It is suggested that the necessary Plan content should be agreed prior to Local Plan submission, whilst some of the more detailed strategy and implementation work will need to continue beyond that point.

Full Reference: C - 6916 - 8452 - 18. MONITORING - None

633

6917 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary:

ECC advises that Monitoring of change in number of biodiversity and geodiversity designated assets in the district is not a sufficient indicator. Single Data List 160-00 return to Government requires monitoring of the number of Local Sites in Positive Conservation Management.

Change To Plan: ECC recommends revising the existing (biodiversity and geology) indicator stating:

'Change in number of biodiversity and geodiversity designated assets in the district' to

'the number of Local Sites in Positive Conservation Management.'

Full Reference: C - 6917 - 8452 - 18. MONITORING - None

6752 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]**

Agent: N/A

Summary: Paragraph 19.4 refers to the Council using CPO powers to assist with delivering development sites and regeneration. This should be extended to refer explicitly to delivery of the strategic infrastructure identified in the IDP, notably the Eastern Stort Crossing as this infrastructure serves a strategic transport purpose and will be needed to facilitate employment and housing growth in and around Harlow. There are various references in the plan and IDP to there being support for the 'northern bypass', beyond the plan period, as a potential long-term transport solution. However, the evidence base prepared to support the draft Plan does not appear to include any transport modelling, assessment of feasibility, or evidence concerning land availability for this strategic piece of infrastructure.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6752 - 7958 - 19. IMPLEMENTATION - None

6698 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]**

Agent: N/A

Summary: Please also mention designated and non-designated assets, locally listed buildings, registered park and garden.

Change To Plan:

Full Reference: C - 6698 - 8623 - GLOSSARY - None

6918 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: For completeness of information / evidence base sources, this needs to refer to the Essex Historic Environment Record.

Change To Plan: ECC recommends adding reference to the Glossary to read as follows:

Heritage Asset 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) or on the Essex Historic Environment Record.

Full Reference: C - 6918 - 8452 - GLOSSARY - None

Sustainability Appraisal (SA) for the Harlow Local Development Plan

SA Report

Harlow Council

May 2018

Quality information

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3	13 March 2018	Final Draft	Alastair Peattie	Principal Consultant
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1. Introduction

- 1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Harlow Local Development Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

SA explained

- 1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²
- 1.3 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.4 More specifically, the SA Report must answer the following three questions:
1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
 2. What are the SA findings at this stage?
 - i.e. in relation to the Draft Plan.
 3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan?

This SA Report⁴

- 1.5 This SA Report is published alongside the Draft Pre-Submission Local Development Plan, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and, as such, each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.
- 1.6 Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

⁴ See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Overview

- 2.1 Once adopted, the Harlow Local Development Plan will set out the framework to guide and shape development in Harlow to 2031, and will replace all of the saved policies of the Adopted Replacement Harlow Local Plan (2006).

Plan vision and objectives

Vision

- 2.2 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.
- 2.3 Harlow's residents will be more active, taking advantage of Harlow's excellent sporting, leisure and cultural facilities.
- 2.4 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.
- 2.5 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.
- 2.6 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.
- 2.7 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.
- 2.8 The amount of vacant and underused land in 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.
- 2.9 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.

- 2.10 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.
- 2.11 New development will minimise the use of global resources, support the development of good waste management and mitigate and adapt to the effects of climate change. 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.

Strategic Objectives

- 2.12 The Local Plan Strategic Objectives are set out in **Table 2.1** below.

Table 2.1: Local Plan Strategic Objectives

Local Plan Theme	Local Plan Strategic Objective
PLACESHAPING (Enhancing the quality of the built and natural environment)	<ol style="list-style-type: none"> 1. Create and enhance high quality built environments which are well connected to revitalised green spaces 2. Deliver high quality design through new development whilst protecting and enhancing the district's historic environment 3. Adapt to and mitigate the impacts of climate change
HOUSING (Delivering housing at the right scale, of the right type and in the right location to meet the whole community's needs)	<ol style="list-style-type: none"> 4. Identify sites to meet local housing needs both now and in the future 5. Provide a range of suitable housing for the community including a range of tenure and type 6. Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates
PROSPERITY (Securing economic growth & regeneration to improve employment & educational opportunities in the district & reflect its strategic role)	<ol style="list-style-type: none"> 7. Meet the employment needs of the district by diversifying and investing in the district's employment base 8. Secure economic revitalisation and reinforce Harlow's reputation as a key centre for Research and Development 9. Improve educational opportunities and the skills base of local residents 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
LIFESTYLES (Sustainably meeting the leisure, recreational and cultural requirements of the community)	<ol style="list-style-type: none"> 11. To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district
INFRASTRUCTURE (Ensuring growth and regeneration is supported by appropriate infrastructure provision)	<ol style="list-style-type: none"> 12. Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities 13. Reduce the need to travel by vehicle by ensuring new development is sustainably located or accessible by sustainable modes of transport 14. Improve transport links, particularly for sustainable modes of transport, to community facilities 15. Enhance and promote the role of Harlow as a transport interchange along the M11

What is the Local Plan not seeking to achieve?

- 2.13 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites/establishment of site-specific policy through this plan should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues (in the knowledge that they can be addressed at the planning application stage). The strategic nature of the Local Plan is reflected in the scope of the SA.

3. What is the scope of the SA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) SA.
- 3.2 Further information on the scope of the SA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix II**.

Consultation on the scope

- 3.3 The Environmental Assessment of Plans and Programmes Regulations 2004 require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁵ As such, these authorities were consulted on the SA scope in 2010. Since that time, the SA scope has evolved as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2010. It should be noted that updated scoping information is presented in **Appendix II** of this SA Report.
- 3.4 It should be noted that the Council is preparing a separate Area Action Plan for Harlow Town Centre and this will also be subject to SA.

SA framework

- 3.5 **Table 3.1** presents the sustainability objectives - grouped under eleven topic headings - established through SA scoping, i.e. in light of context/baseline review and consultation. Taken together, the sustainability topics and objectives provide a methodological 'framework' for undertaking appraisal.

Table 3.1: SA topics and objectives (i.e. the SA framework as broadly agreed in 2010)

SA Topics	SA Objectives
Air quality	<ul style="list-style-type: none"> To ensure that the Air Quality in Harlow remains below objective limits and continues to improve.
Biodiversity and green infrastructure	<ul style="list-style-type: none"> To conserve and enhance biodiversity in Harlow. To promote, enhance and strategically expand the district's network of green infrastructure.
Climate change (mitigation & adaptation)	<ul style="list-style-type: none"> To lower Greenhouse Gas (GHG) emissions. To increase the amount of energy generated by decentralised or renewable sources and the use of renewable sources of energy by new development. To minimise the impact of development on surface water flooding and avoid development within areas of flood risk.
Community and wellbeing	<ul style="list-style-type: none"> To reduce poverty and social exclusion. To meet the health and social care needs of the district's growing and ageing population and its disabled population. To encourage healthy lifestyles and reduce inequalities in health, particularly through reducing obesity and diabetes. To reduce levels of crime, particularly Criminal Damage and Arson and Vehicle Offence crimes.

⁵ In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

SA Topics	SA Objectives
	<ul style="list-style-type: none"> To renew the district's deprived neighbourhoods and address poor public realm within and around residential areas to ensure that pedestrian routes are integrated with areas of activity.
Economy and employment	<ul style="list-style-type: none"> To reduce a mismatch between jobs and skills by improving levels of skills, training and qualifications within the district. To ensure that job creation is matched by the provision of appropriate facilities and infrastructure. To promote investment, develop an attractive employment base and create a diversified economy within the district through avoiding the dominance of a few large employers and encouraging the 'clustering' of businesses within existing locations. To regenerate the town centre through upgrading the level of retail provision, encouraging a broader mix of uses including residential, introducing a high quality public realm and restructuring centres to increase passing traffic and overcome accessibility issues.
Historic environment	<ul style="list-style-type: none"> To protect the district's historic environmental assets from inappropriate development. To ensure that development respects the character, appearance and features of historical designations, in addition to the setting and views into or out of these areas. To ensure that the existing historic settlements and distinct settings of Churchgate Street and Old Harlow, and the new settlement of Newhall, retain their distinctive identity. To promote the creation of quality streets and spaces whilst protecting the town's distinctive character and heritage.
Housing	<ul style="list-style-type: none"> To increase the provision of housing, particularly affordable housing, to ensure that appropriate levels of new dwellings are provided over the plan period. To diversify the housing stock, increase density and address poor public realm within and around residential areas. To ensure that that the housing needs of an ageing (and disabled) population are met.
Land and waste	<ul style="list-style-type: none"> To support efficient use of land, including development of previously developed land in the district. To support the remediation of contaminated land.
Landscape	<ul style="list-style-type: none"> To ensure that development takes into account the Green Belt and Green Wedges that characterise the district. To ensure that the district's landscape assets are protected and integrated to maximise their potential amenity value, particularly in greenfield areas.
Transport	<ul style="list-style-type: none"> To promote a more sustainable modal shift so that levels of private car use for commuting are reduced. To promote measures that integrate transport and land use planning in order to provide for the greatest possible increase in passenger transport uptake as well as implementing enhanced access to the M11 through a new junction.
Water	<ul style="list-style-type: none"> Given that Harlow is located in an area of serious water stress which will be exacerbated due to climate change and future growth and development, water efficiency measures should be sought, including through the promotion of SuDS. To encourage reduced per capita consumption of water and maintain high levels of drinking water quality. To maintain and improve the water quality of Harlow's water courses in line with the Water Framework Directive requirements. To ensure the distribution and location of new development takes the water supply and sewerage infrastructure into account.

Part 1: What has plan-making /
SA involved up to this point?

4. Introduction (to part 1)

- 4.1 In-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the Draft Pre-Submission Local Development Plan.
- 4.2 This part of the report sets out to present information regarding the consideration of reasonable alternatives, in particular District-wide spatial strategies, i.e. alternative approaches to the allocation of land to meet housing needs. This information is important given regulatory requirements.⁶
- 4.3 Plan-making has been underway since 2007, with a number of consultations being held prior to this current stage under Regulation 19 of the Local Planning Regulations. **Figure 1** sets out the key steps to date for plan-making and the SA.

Figure 1: Key steps in plan-making/SA process



- 4.4 As illustrated in the Figure above, there have been a number of steps leading up to the publication of the Draft Pre-Submission Local Development Plan. Reasonable alternatives have been developed and considered through the SA at key stages as appropriate.
- 4.5 Part 1 of this SA Report focuses on the work undertaken in 2016 and 2017 that led to the development of reasonable alternatives and the preferred approach set out in the Draft Pre-Submission Local Development Plan in 2018. This includes joint work undertaken amongst the four authorities that comprise the West Essex and East Hertfordshire Housing Market Area (HMA) to establish Objectively Assessed Housing Need (OAHN) for the HMA and how this need should be apportioned between the four authorities (and, in particular, how the growth of Harlow should be best accommodated).

⁶ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. Whilst this report is not the SA Report, it is appropriate to present this information nonetheless for the benefit of stakeholders.

- 4.6 To avoid unnecessary confusion we do not provide the detail of the earlier alternatives work presented in the Interim SA Reports published in 2010 and 2014. The HMA level work carried out in 2016 superseded the earlier work and, as a result, it was necessary to revisit and refine the understanding of the reasonable alternatives for Harlow.
- 4.7 The documents set out in the Figure above, including Interim SA Reports, are available on the Council's website.⁷

What about other plan issues?

- 4.8 Whilst the plan will set policy in relation to a range of range of issues aside from spatial strategy, it is clear that setting spatial strategy is at the heart of the plan. It is the key issue to be addressed, and taken to be the primary objective of the plan. Hence it is considered reasonable⁸ that alternatives appraisal should focus on this matter.
- 4.9 Whilst the plan will set policy to address a range of other thematic issues (both strategic, e.g. in relation to "The Natural Environment, Landscape Character and Green Infrastructure"; and development management, e.g. "Heritage Assets") these policy areas have not been a focus of alternatives appraisal, and are not discussed further within this part of the Report.
- 4.10 It should again be noted that the Council is producing an Area Action Plan (AAP) to cover the area of Harlow Town Centre. The AAP will provide a spatial planning framework to guide development and secure the regeneration of Harlow Town Centre for the period up to 2033. The AAP will be subject to SA and this will consider a range of issues that are relevant to the Town Centre.

What about site options?

- 4.11 Site options identified by the Council were appraised through the SA. The role of site options appraisal within the SA process has primarily been to provide an evidence base to facilitate the development of District-wide reasonable alternatives.⁹ As such, site options appraisal is not given further explicit attention within this part of the report. The formal site options appraisal findings are presented in **Appendix III**.

Structure of this part of the report

- 4.12 This part of the report is structured as follows:
- **Chapter 5** - explains reasons for selecting the alternatives dealt with;
 - **Chapter 6** - presents an appraisal of the reasonable alternatives; and
 - **Chapter 7** - explains reasons for selecting the preferred option, in light of the appraisal of reasonable alternatives.

⁷ <http://www.harlow.gov.uk/local-plan>

⁸ Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.

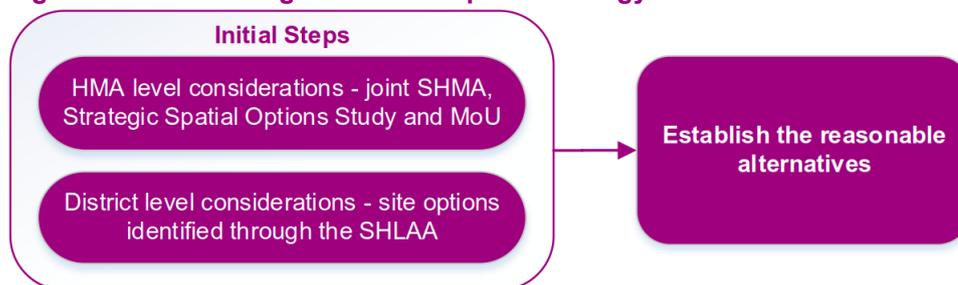
⁹ In other words, site options appraisal was undertaken as a means to an end (i.e. development and appraisal of reasonable alternatives), rather than an end in itself. It is worth noting that individual site options are not 'alternatives' in that they are not mutually exclusive.

5. Establishing the reasonable alternatives

Introduction

- 5.1 The aim here is to discuss the key steps undertaken in 2016 and 2017 that led to the development of reasonable spatial strategy alternatives for appraisal and then consultation in 2018. Ultimately, the aim of this chapter is to present ‘an outline of the reasons for selecting the alternatives dealt with’, in accordance with the Regulations.
- 5.2 Specifically, this chapter explains how reasonable alternatives were established subsequent to certain initial steps - see **Figure 2**.

Figure 2: Establishing reasonable spatial strategy alternatives



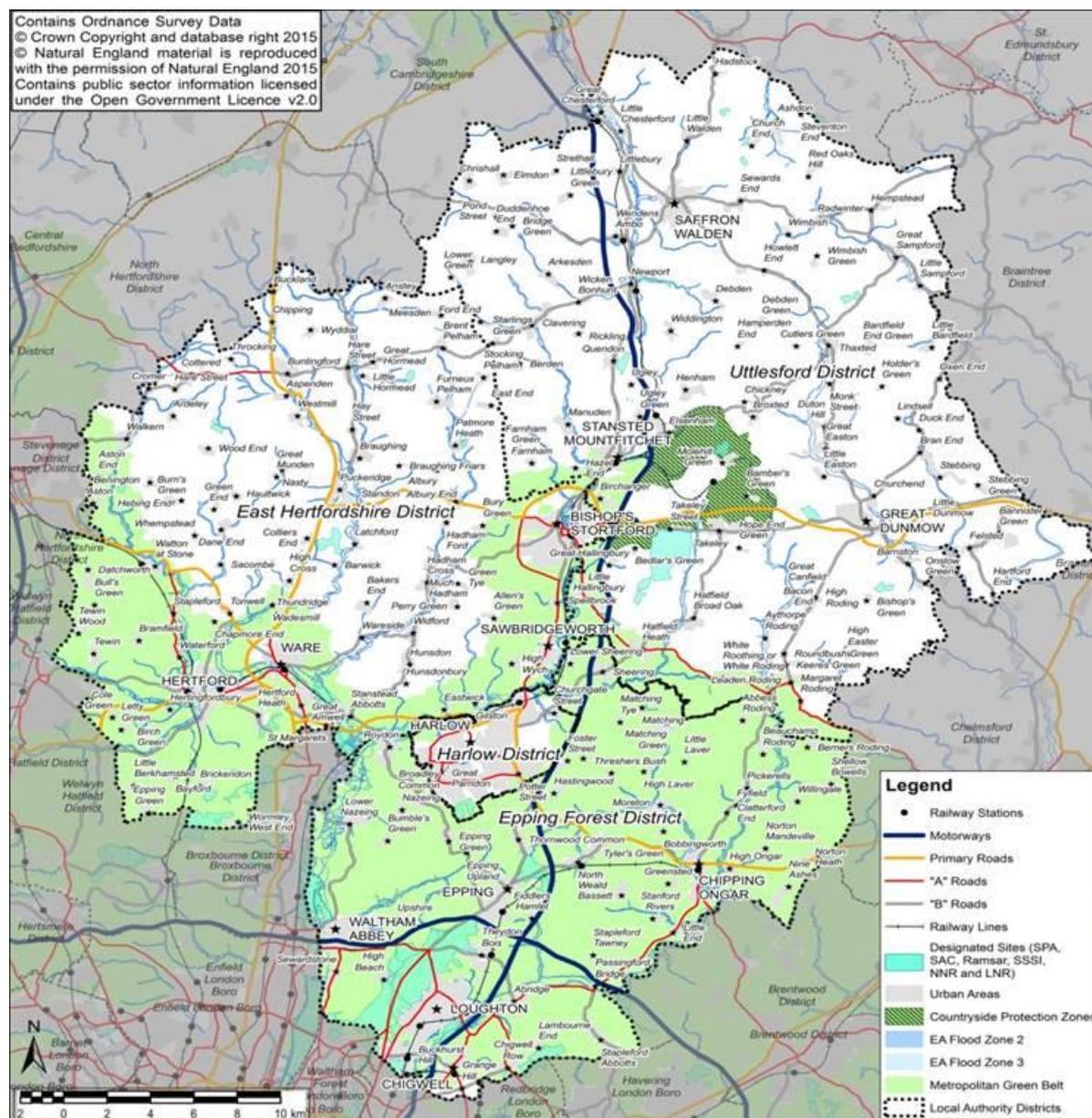
- 5.3 We firstly discuss the initial steps in turn, and then conclude by explaining how the evidence-base was drawn on to establish District-wide reasonable alternatives for appraisal through the SA.

Housing Market Area (HMA) level considerations

Overview

- 5.4 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 see **Figure 3**, 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.

Figure 3: West Essex and East Hertfordshire Housing Market Area



Step 1 - Establish understanding of housing and economic needs

- 5.5 A joint Strategic Housing Market Assessment (SHMA) was undertaken for the four authorities of the HMA - East Herts District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council - in order to establish Objectively Assessed Housing Need (OAHN) for the HMA.
- 5.6 The SHMA was published in September 2015 and identified OAHN for the HMA to be 46,100 dwellings over the period 2011 - 2033, equivalent to an average of 2,095 dwellings per year. This included an Objectively Assessed Need for Affordable Housing of 13,600 dwellings.¹⁰
- 5.7 The SHMA provided a break-down OAHN for each authority, as follows:
 - 16,400 dwellings in East Hertfordshire (745 per year);
 - 11,300 dwellings in Epping Forest (514 per year);

¹⁰ Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings.

- **5,900 dwellings in Harlow (268 per year); and**
 - 12,500 dwellings in Uttlesford (568 per year).
- 5.8 In addition, the SHMA highlighted that the Department of Communities and Local Government's (DCLG)¹¹ 2012-based household projections showed the number of households in the HMA increasing from 175,189 to 224,827 over the 22-year period 2011-33. The SHMA explained that:
- “PPG [Planning Practice Guidance] identifies that the starting point for estimating housing need is the [D]CLG 2012-based household projections. For the 22-year period 2011-33, these projections suggest an increase of 49,638 households across the West Essex and East Hertfordshire HMA: an average growth of 2,256 households each year, comprised of 779 in East Hertfordshire, 653 in Epping Forest, **326 in Harlow** and 498 in Uttlesford.”
- 5.9 In August 2016, Opinion Research Services (ORS) updated the OAHN (but without undertaking a full review of the SHMA) to take into account more recent information including the DCLG 2014-based household projections and suggested a revised OAHN for the HMA of 54,608 disaggregated as follows:
- 19,427 dwellings in East Hertfordshire (883 per year);
 - 13,278 dwellings in Epping Forest (604 per year);
 - **7,824 dwellings in Harlow (356 per year); and**
 - 14,080 dwellings in Uttlesford (640 per year).

N.B. Alongside the SHMA, the four authorities commissioned a study to consider the Objectively Assessed Economic Need of the Functional Economic Market Area (FEMA),¹² which considers a wider area than that of the HMA.¹³ This was published in 2015 and provided an up-to-date assessment of jobs growth need in the FEMA for the period 2011-2033. The study identified a net jobs growth per year of 1,890 for the FEMA. For the West Essex and East Hertfordshire authority areas, this translated into the following ranges in jobs growth: 435 - 505 jobs per year in East Herts; 400 - 455 jobs per year in Epping Forest; **325 - 335 jobs per year in Harlow**; 665 - 675 jobs per year in Uttlesford.

Step 2 - Develop and appraise strategic spatial alternatives

- 5.10 In response to a need to fulfil Duty to Cooperate requirements, and to adhere to the spirit of the current NPPF¹⁴ which requires that local authorities “... *demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*”¹⁵, the West Essex and East Hertfordshire authorities explored options for meeting Objectively Assessed Need in the sub-region. This included the consideration of a range of locational options for delivering housing.
- 5.11 To support this process the four authorities undertook the following:
- identified options for spatially distributing the housing need identified in the SHMA (2015), the DCLG 2012-based household projections and the August 2016 advice from ORS across the HMA, based on an analysis of the policy context and evidence base;
 - provided an evidence-based Sustainability Appraisal setting out the anticipated significant positive and negative impacts of each option (including opportunities to deliver infrastructure, employment development, regeneration benefits, etc.) and potential mitigation measures (where relevant); and

¹¹ Please note DCLG is now called the Ministry of Housing, Communities and Local Government (MHCLG).

¹² Hardisty Jones Associates (September 2015) Economic Evidence to Support the Development of the OAHN for West Essex and East Herts

¹³ The FEMA covers the four authority areas, but also includes: Broxbourne, a fringe area comprising all of the immediately adjacent local authorities; and a link to central London.

¹⁴ A revised NPPF has been published for consultation in March 2018. Transitional arrangements are also proposed which will apply the previous Framework to the examining of plans which are submitted on or before the date which is six months after the date of the publication of the new Framework.

¹⁵ Paragraph 181, National Planning Policy Framework

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- developed a Memorandum of Understanding (MoU) between the four authorities which sets out a high level agreement as to how new housing should be distributed across the HMA.
- 5.12 These activities are collectively referred to as the Strategic Spatial Options Study. It is anticipated that the study will provide a critical piece of evidence for demonstrating to the Planning Inspectorate at the independent examinations into the four local plans that the key strategic issue of housing growth has been robustly addressed and that the Duty to Co-operate has been clearly complied with.
- 5.13 As part of the Strategic Spatial Options Study, a range of spatial options for distributing housing across the HMA were considered. Three levels of growth were considered:
- ~46,100 new homes in line with the 2015 SHMA
 - ~49,638 new homes in line with the DCLG 2012-based household projections
 - ~57,400 new homes in line with early advice from ORS in light of more recent information including the DCLG 2014-based household projections (NB this figure was later revised down to 54,608 – see above)
- 5.14 In particular, the spatial options explored different levels of growth in and around Harlow, a key urban centre within the HMA:
- ~10,500 (lower growth)
 - ~14,150 (medium growth)
 - ~17,650 (higher growth)
 - ~20,985 (maximum growth)
- 5.15 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 HMA¹⁶)
 - **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)

Step 3 - Identify the preferred strategy

- 5.16 To assist in discharging the Duty to Co-operate, the Co-operation for Sustainable Development Member Board (the Co-op Member Board) considered six options (A-F) for accommodating new housing development across the West Essex and East Hertfordshire Housing Market (HMA) area up to 2033 (see above). These six options varied in terms of: (i) the overall quantum of development to be provided for across the HMA (ranging from ~48,300 to ~56,250 new houses); and (ii) the spatial distribution of that development. Varying the overall quantum of development allowed the Co-op Member Board to test the implications of different levels of growth including: 46,100 (the figure for OAHN in the Strategic Housing Market Assessment, SHMA); 49,638 (a figure based on the CLG 2012-based household projections); and 54,608

¹⁶ Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion.

(an updated OAHN figure provided by Opinion Research Services, ORS, in light of information including the CLG 2014-based household projections). Varying the spatial distribution of development allowed the Co-op Member Board to explore the implications of focusing different levels of development in different parts of the HMA. In particular, the options varied in terms of the level of development located in and around Harlow, the HMA's key urban centre.

- 5.17 The implications of the six HMA spatial strategy 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;¹⁷
 2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water. The findings of the SA were published in 2016;¹⁸
 3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the European sites; and
 4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.¹⁹
- 5.18 The findings of these studies are summarised below.

Transport modelling

- 5.19 The transport modelling indicated a 35-40% increase in trips on the network by 2033 based on 14,000 new homes in and around Harlow (and 48,000 across the wider HMA) (NB 14,000 equates to Option A above) compared to the base year 2014. In light of the transport modelling, it was concluded that a major improvement at Junction 7 of the M11 and a new Junction 7A were both essential to deliver growth. It was also concluded that a major improvement at Junction 8 was also essential to support HMA growth as well as potential expansion at Stansted Airport beyond the currently consented growth of up to 35 million passengers per annum (mppa).
- 5.20 With respect to Harlow town, in light of the transport modelling, it was also concluded that early delivery of a second crossing over the River Stort was essential to enable the development of an effective north-south sustainable travel corridor, significant modal shift towards public transport, walking and cycling and wider network benefits to Harlow (NB sustainable travel corridors are also arguably a key element of any 'garden settlement' approach to development in and around Harlow). In terms of the level of development that can be accommodated in and around Harlow, the transport modelling undertaken to date indicates that growth of between 14,000 and 17,000 new homes in and around Harlow could be accommodated provided that key mitigation measures are delivered during the plan period. For this reason, agreement was sought on a MoU on Highways and Transportation Infrastructure for the West Essex and East Hertfordshire HMA.

Harlow Strategic Site Assessment Report

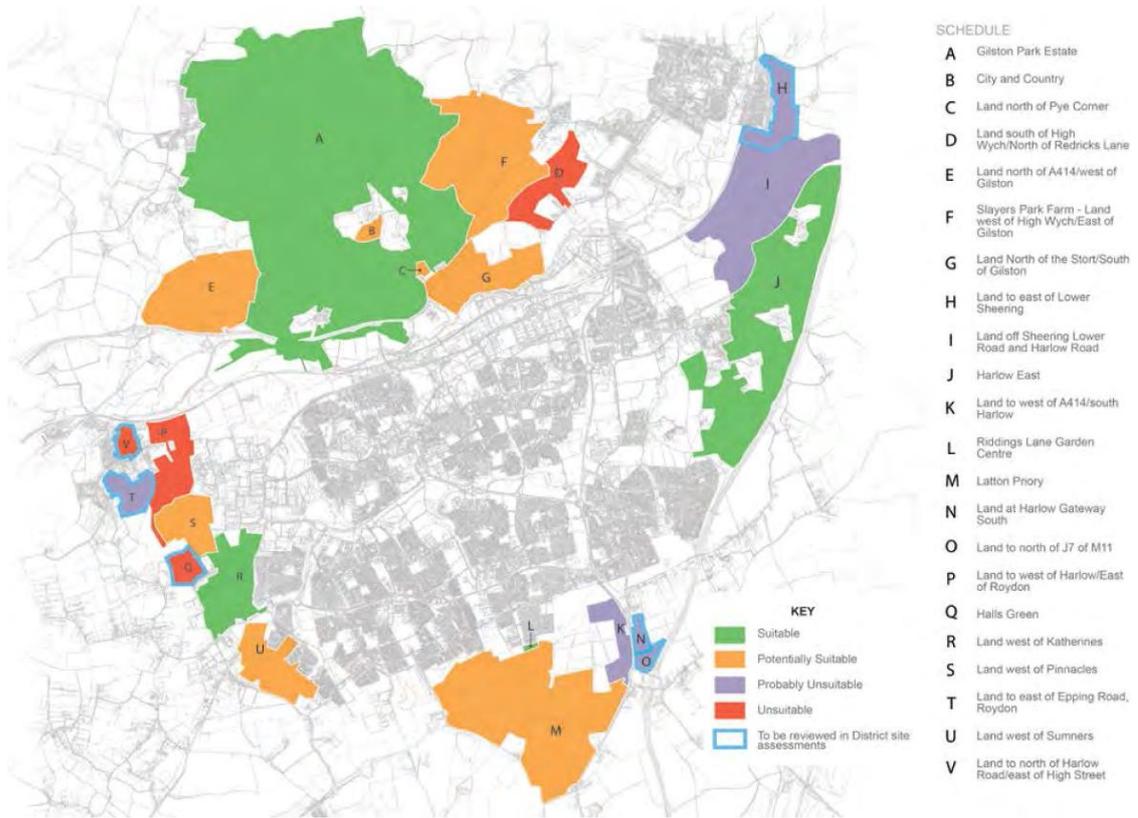
- 5.21 The Harlow Strategic Site Assessment Report (Sept 2016) identified an initial 'basket of sites' or a long list deemed to be 'suitable' or 'potentially suitable' for future development (should there be appropriate site specific mitigation and dependent on strategic Harlow-wide infrastructure improvements). The findings of the assessment are presented in **Figure 4** below.

¹⁷ Essex County Council. West Essex and East Hertfordshire Local Plan Modelling. Technical Notes 1 to 6.

¹⁸ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

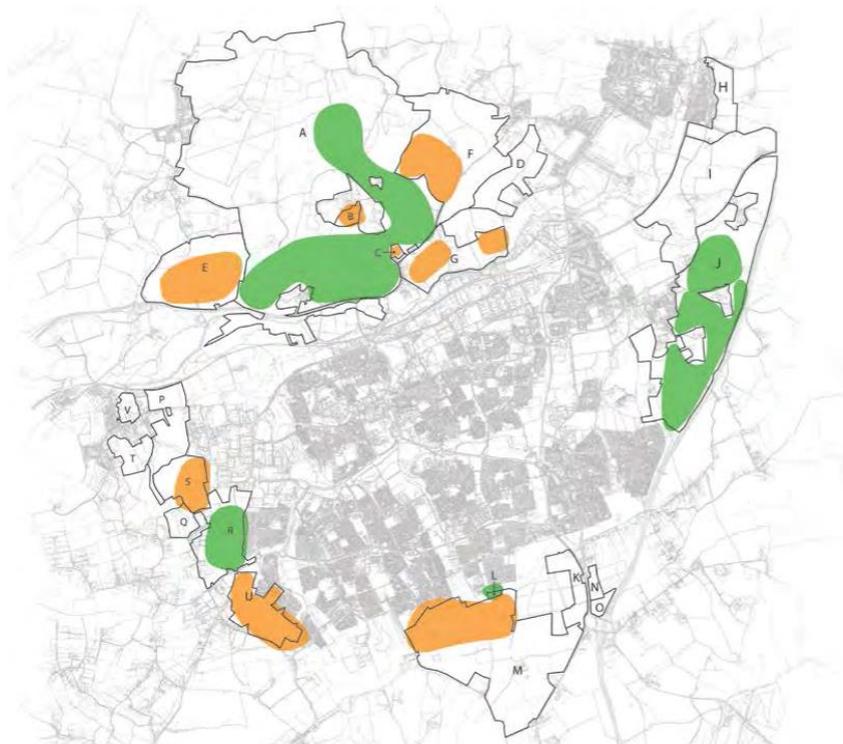
¹⁹ East Herts, Epping Forest, Harlow and Uttlesford District Councils (2016) Harlow Strategic Site Assessment Report.

Figure 4: Harlow Site Assessment Report summary findings



5.22 An analysis of constraints and promoter proposals as part of the Strategic Site Assessment Report showed that, largely in landscape terms, the full extent of many of the sites would not be developed. The approximate extent of the appropriate developable areas for the sites judged to be suitable or potentially suitable is presented in **Figure 5**.

Figure 5: Approximate developable areas of suitable and potentially suitable sites

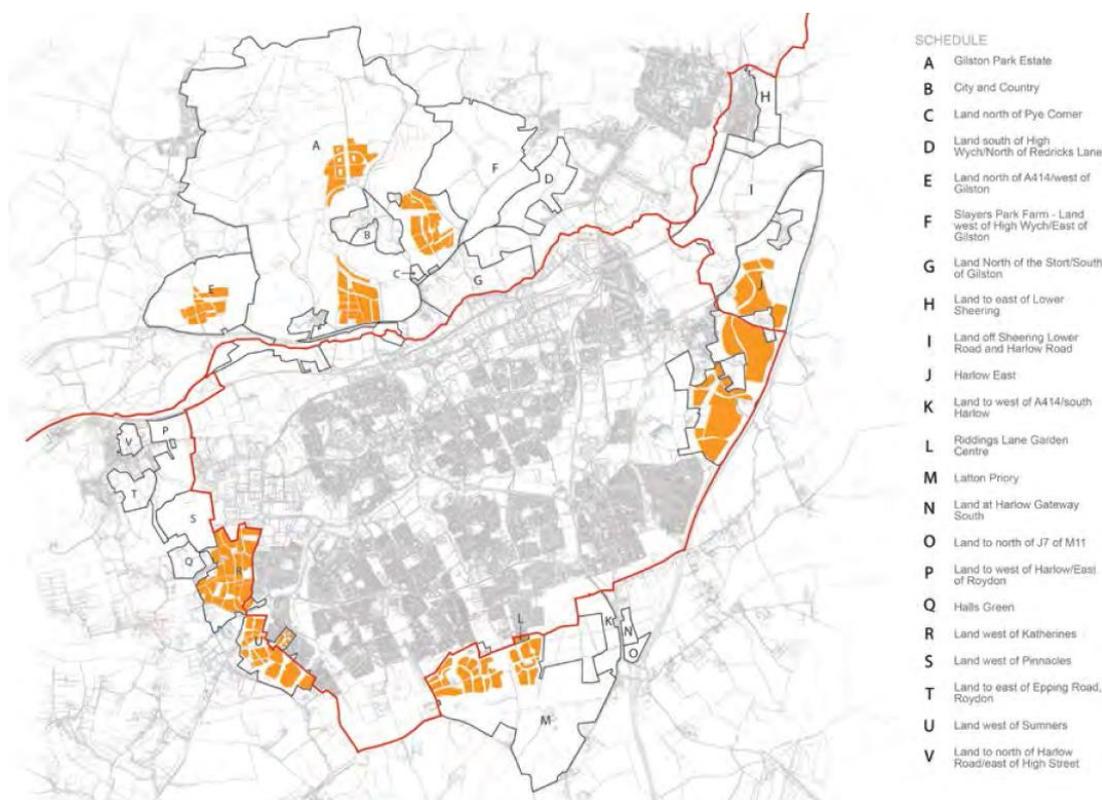


5.23 Taking **Figure 5** as the starting point, the Strategic Site Assessment Report then identified synergistic spatial opportunities for sites considered in combination(s). It identified that there are sufficient suitable sites in and around Harlow to accommodate close to 16,100 units provided that:

- Further detailed traffic modelling for development to the East of Harlow demonstrates growth is deliverable on the scale envisaged;
- Significant infrastructure requirements are met, including highways, sustainable travel options, education, sewerage/drainage etc.;
- Landscape impacts can be mitigated; and
- Development can be distributed amongst several sites in combination (e.g. north and west of Harlow).

5.24 Based on the evidence available and assessments carried out, the report recommended the most suitable option for growth capable for accommodating 16,100 units. This is presented in **Figure 6** below with the shaded orange areas showing the indicative net developable area on sites deemed to be suitable/potentially suitable.

Figure 6: Harlow Site Assessment Report recommended options



Sustainability Appraisal

5.25 As part of the Strategic Spatial Options Study, a Sustainability Appraisal (SA) was carried out to assist in determining the most appropriate housing growth and distribution option for the HMA. An appraisal of the reasonable strategic spatial options identified in Paragraph 5.16 of this SA Report was carried out against a SA Framework.

5.26 The SA found that in many respects the overall sustainability performance of many of the strategic spatial options considered were broadly similar. However, there were differences between them in terms of the potential environmental effects that might arise and the socio-economic opportunities offered by the options in specific locations. For example Options A, B, C and E, which promoted the delivery of an increased proportion of housing in the parts of the sub-region outside of Harlow, would increase the potential for supporting services and facilities

across a broader range of locations than Option D. Option D, through limiting housing delivery in Bishop's Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey, Saffron Walden and Great Dunmow, and larger villages in Uttlesford, might reduce the potential for effects on landscape and townscape character, biodiversity assets and air/noise quality in the vicinity of these locations. However this would come at a significant trade-off in terms of meeting local housing needs and supporting the vitality of these settlements. Similarly, whilst Options D, E and F, and to a lesser extent, Option A had increased potential to lead to environmental effects in the vicinity of Harlow, these options would do more to realise the wider sustainability benefits associated with focusing growth in the primary settlement of the sub-region.

- 5.27 Options D, E and F proposed a higher level of growth and were therefore identified as having the greater potential to deliver a broader range of housing types and tenures, promote the vitality of settlements and support infrastructure delivery.
- 5.28 The SA concluded that, overall, the sustainability performance of the six options would largely depend on the more detailed elements relating to the delivery of growth in the sub-region. This would relate to the specific location of new development areas, the design and layout of new development and the integration of elements such as enhancements to sustainable transport networks and green infrastructure provision.
- 5.29 It should be noted that the SA work carried out as part of the Strategic Spatial Options Study was not undertaken in line with the requirements prescribed by the SEA Regulations. The SA in that case focussed solely on reasonable alternatives and there was no 'draft plan' being prepared. Instead, it was anticipated that the selected alternative would be reflected in the content of the emerging Local Plans for East Herts, Epping Forest, Harlow and Uttlesford Districts.

Habitats Regulations Assessment

- 5.30 As part of the Strategic Spatial Options Study, a Habitats Regulations Assessment (HRA) was carried out to determine the implications of the strategic spatial options, if any, for the integrity of European sites.
- 5.31 Potential effects on the Lee Valley SPA/Ramsar, Epping Forest SAC and Wormley-Hoddesdon Park Woods SAC were examined as a result of disturbance from recreational activities and effects arising from urbanisation, atmospheric pollution, water abstraction and changes in water quality.

Atmospheric pollution

- 5.32 With respect to atmospheric pollution and the key issue of transport pollution affecting Epping Forest SAC, the HRA concluded that there was relatively little difference between any of the options. The HRA indicated that no option resulted in a change in nitrogen or acid deposition rate equivalent to (or even close to) 1% of the critical load on any road link. It was therefore possible to conclude, in line with relevant guidelines that all options would make an imperceptible or inconsequential contribution to local nitrogen and acid deposition within Epping Forest SAC. As such, it was concluded that there would be no adverse effect on the integrity of Epping Forest SAC from the options, either alone or in combination with other plans and projects (the same conclusion also applied to the other two European sites). In practice, the HRA was not therefore material to the ultimate choice of option.
- 5.33 However, it was evident from the HRA work that, even allowing for some improvement in background air quality to 2033 from improved emissions technology, the total nitrogen deposition rates adjacent to all modelled road links would reach, or exceed, the lowest point of the currently used critical load range for Epping Forest SAC. As such, while the modelling indicated that none of the options could be 'blamed' for making a significant contribution to the future elevated nitrogen deposition rates, when all traffic is taken together there would clearly remain potential for a continued negative effect on the SAC by 2033. Therefore, while it may not be required as 'mitigation', the HMA authorities pursued agreement on a MoU on Managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping

Forest SAC, the signatories of which included Natural England and the City of London Corporation (Conservators of Epping Forest).²⁰

Recreational pressure

- 5.34 In terms of recreational pressures, whilst significant effects from the options considered were not anticipated on Lee Valley SPA/Ramsar site or Wormley Hoddesdonpark Woods SAC, it was recommended that all new development deliver greenspace in line with the Natural England Accessible Natural Greenspace (ANGSt) standard to ensure it is self-sufficient. Adverse effects on Epping Forest SAC due to growth in Epping Forest District in particular could not be dismissed particularly due to development in the following settlements: Loughton, Epping, Waltham Abbey, Theydon Bois and Chigwell. More detailed visitor survey work may be required. Any such survey, and any more refined assessment of impacts and mitigation solutions would be undertaken within the scope of a strategic commitment that all the HMA authorities have made in the MoU between the HMA authorities, Essex County Council, Hertfordshire County Council, Natural England and the Corporation of London. Visitor survey work has now been completed and strategic mitigation solutions will follow (such as access management contributions and, for the largest sites, provision of on-site alternative recreational natural greenspace).

Water abstraction and quality

- 5.35 In relation to water abstraction, the HRA concluded that the options would not result in adverse effects on the Lee Valley SPA/Ramsar site through excessive water drawdown, either alone or in combination with other plans and projects. It also concluded that there would not be a water quality effect from the options on Lee Valley SPA/Ramsar site either alone or in combination with other projects and plans.

Preferred Spatial Option

- 5.36 In light of the work outlined above, the Co-op Member Board identified a Preferred Spatial Option to deliver c. 51,000 new homes across the HMA to 2033 broken down in Table 5.1 below.

Table 5.1: The preferred broad strategy for the HMA

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	c. 18,000
Epping Forest District Council	c. 11,400
Harlow District Council	c. 9,200 (N.B. this target is higher than the identified OAHN at the time)
Uttlesford District Council	c. 12,500
Total across the HMA	c. 51,100
...of which the area in and around Harlow ²¹ will provide	c. 16,100

- 5.37 The preferred strategy was established drawing on evidence available at the time on the basis that:
- At c. 51,000 new homes, the planned level of housing growth is higher than both the established OAHN within the published 2015 SHMA (46,100) and the figure based on the CLG 2012-based household projections (49,638). It is lower than ORS' estimated OAHN figure taking into account recent information including the CLG 2014-based household projections (54,608) but nonetheless represents good progress towards this higher figure.

²⁰ Memorandum of Understanding (Feb 2017) Managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation.

²¹ 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

Overall, the figure of c. 51,000 indicates that the four HMA authorities are positively seeking opportunities to meet the development needs of their areas in line with the National Planning Policy Framework (NPPF), and, furthermore, significantly boosting the supply of housing (NPPF, para. 47).

- Harlow represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town. The findings and recommendation of the London Stansted Cambridge Corridor (LSCC) Growth Commission report, published in July 2016, stated that “*Broxbourne, Harlow and Stevenage have significant strategies and ambitions for growth and development. They can play an important role in supporting the Corridor’s tech and life sciences clusters. Current development and future plans will greatly improve the industrial, commercial and residential offer. These areas must be supported to provide the right types of development that enhance the quality of place for the Corridor’s knowledge-based industries and residents*” (our emphasis).²²
- The transport modelling to date demonstrates that growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated provided that the mitigation measures set out in the then Draft [now signed] Highways and Transportation Infrastructure MoU for the West Essex and East Hertfordshire HMA are delivered during the plan period. Evidence suggested that growth beyond 2033 is likely to be possible subject to further transport modelling and the identification and delivery of additional strategic highway mitigation measures.
- The Harlow Strategic Site Assessment (September 2016) indicated that sufficient suitable strategic sites are available in and around Harlow to deliver the figure of c. 16,100 (together with sites either already completed or granted planning permission as well as urban brownfield sites). The Strategic Site Assessment is available on the Council’s Local Plan evidence-base webpage.²³

Updated evidence

- 5.38 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.
- 5.39 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).
- 5.40 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.²⁴ 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.

²² London Stansted Cambridge Corridor Growth Consortium (2016). Findings and recommendation of the London Stansted Cambridge Growth Commission www.lscgcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf.

²³ Harlow, Epping Forest, East Herts and Uttlesford District Councils (2016) Harlow Strategic Site Assessment. Prepared by AECOM.

²⁴ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

- 5.41 As a result, the HMA authorities are 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.²⁵ Harlow Council's housing requirement therefore remains 9,200 dwellings as set out within the signed MoU (March 2017) and is still higher than the identified OAHN of 7,409 dwellings.

District level considerations

Overview

- 5.42 The HMA work discussed above resulted in an understanding of the preferred strategic sites within and surrounding Harlow, and resulted in an understanding of the housing requirement which would need to be delivered through other sites within Harlow. There remained a need to develop a District-wide understanding of the site options available to deliver the remaining housing requirement.

Housing sites

- 5.43 To inform the preparation of the Local Development Plan the Council carried out a Strategic Housing and Land Availability Assessment (SHLAA) to identify opportunities to meet the town's housing need and provide information about the deliverability of potential sites. The SHLAA was published in 2014 and **Figure 7** below shows the sites that were identified and considered through that assessment.

Figure 7: Sites identified and considered through the SHLAA process



²⁵ 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.

- 5.44 The method and detailed findings of the SHLAA are available on the Council's website.²⁶ It is important to note that a significant number of sites identified and assessed through the SHLAA process are in public ownership. As explained in the SHLAA Report (2014), “*This is the legacy from the New Town era where land and buildings were extensively owned by the Harlow Development and then Commission for New Towns and Homes and Communities Agency. Much of the land and buildings were transferred into Council Ownership. In addition Essex County Council has put forward land in its ownership*”.
- 5.45 At the time the SHLAA (2014) found that the potential dwelling supply in Harlow was 8,886 dwellings, which included new sites (2,307 dwellings) commitments (4,027 dwellings), completions (541 dwellings from 01/04/11 to 31/03/13) and potential development that could be delivered at the strategic broad location in the east 2,011 dwellings).
- 5.46 All of the sites identified and considered through the SHLAA were appraised through the SA process. The findings of this work are presented in **Appendix III** of this SA Report.
- 5.47 Since the publication of the SHLAA the call for sites has remained opened and the Council has continued to monitor and update the evidence relating to land availability and housing supply (see below). For further information on the Council's site selection process please refer to **Appendix III**.

Housing requirement

- 5.48 The most recent SHMA update (July 2017) identified that Harlow has an OAHN of 7,409 dwellings. The Local Plan must ensure there is a sufficient supply of market, affordable and specialist dwellings to meet this need. To contribute to the substantial need for affordable housing need across the HMA²⁷ and aspirations for regeneration in Harlow²⁸, an additional 1,800 dwellings are also to be delivered as agreed through the signed MoU in March 2017. This gives a total housing requirement for Harlow of 9,200 dwellings.
- 5.49 Since the start of the Local Development Plan period (1st April 2011), 5,558 dwellings have been completed and/or granted planning permission, a significant contribution towards meeting this housing requirement. This leaves an additional requirement of 1,042 dwellings to be delivered, as shown in **Table 5.2** below.

Table 5.2: Housing supply

	Dwellings
Completions at 31 March 2017	1,436
Commitments at 31 March 2017	4,122
Strategic Housing Site East of Harlow	2,600
Additional Requirement	1,042
Total	9,200

- 5.50 It should be noted that whilst there has been a steady supply of windfall sites, their contribution to the overall 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. The Council therefore considered that the windfall supply in Harlow would not meet the national criteria and consequently could not be included as a reliable source of supply in the five year supply calculations.

²⁶ Harlow Council (2014) Strategic Housing and Land Availability Assessment.

²⁷ Opinion Research Services (July 2017) West Essex and East Hertfordshire Strategic Housing Market Assessment: Affordable Housing Update.

²⁸ Harlow Council (2013) Harlow Future Prospects Study: Linking Regeneration & Growth.

Establishing reasonable alternatives

- 5.51 In trying to establish reasonable alternatives for delivering the remaining housing requirement of 1,042 dwellings, it is 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 and the size of the District is therefore very small and constrained by the Green Belt.
- 5.52 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 / green 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.
- 5.53 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.
- 5.54 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.
- 5.55 Through the site selection process (see **Appendix III**) the Council identified twenty one 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. It should be noted that the three open space sites are identified as being of low value and quality through the Harlow Open Space and Green Infrastructure Study (2013).²⁹
- 5.56 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 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.
- 5.57 In line with the NPPF and given the importance of the open spaces within Harlow, 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.
- 5.58 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;
 - 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 Hatches³⁰ where higher density would stimulate regeneration due to their close proximity to public transport.

²⁹ Harlow Council (2013) Open Space and Green Infrastructure Study. Prepared by LUC.

³⁰ 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.

- 5.59 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.
- 5.60 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 5.3** below.

Table 5.3: 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
TOTAL DWELLINGS				Option A 1,147		Option B 1,951		Option C 3,530	

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6. Appraisal of the reasonable alternatives

Introduction

6.1 The aim of this chapter is to present summary appraisal findings in relation to the reasonable alternatives introduced above. Detailed appraisal findings are presented in **Appendix IV**.

Summary alternatives appraisal findings

6.2 **Table 6.1** presents summary appraisal findings in relation to the three alternatives introduced above. Detailed appraisal methodology is explained in **Appendix IV**. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using **red / green**) and also rank the alternatives in relative order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them). A star is used to highlight the option or options that are preferred from an SA perspective.

Table 6.1: Summary spatial strategy alternatives appraisal findings

Summary findings and conclusions						
Topic	Categorisation and rank					
	Option A Preferred approach		Option B Moderate density on certain PDL sites		Option C High density on certain PDL sites	
	Rank	Significant effect?	Rank	Significant effect?	Rank	Significant effect?
Air quality	1	No	2	No	3	?
Biodiversity and green infrastructure	=	No	=	No	=	No
Climate change	1	No	2	No	3	?
Community and wellbeing	=	Yes	=	Yes	=	Yes
Economy and employment	2	No	2	No	1	No
Historic environment	1	No	2	No	3	?
Housing	2	Yes	2	Yes	1	Yes
Land and waste	=	No	=	No	=	No
Landscape	1	No	2	No	3	?
Transport	1	No	2	No	3	?
Water	=	No	=	No	=	No

- 6.3 There are no differences between the options in terms of the spatial distribution/location of development. Options B and C propose a higher housing density at eight brownfield sites that are close to the town centre, the District's Hatches and/or potential sustainable transport corridor nodes. The appraisal therefore focused in particular on the issues of increased density at eight of the proposed sites as well as the resulting overall increase in growth for the District as a whole. In terms of the overall level of growth, Option A would deliver 1,147 dwellings; Option B 1,951 dwellings and Option C 3,530 dwellings during the life of the Plan.
- 6.4 The SA found that there are both positive and negative aspects of delivering increased densities at the eight brownfield sites identified. The additional housing growth could further assist regeneration through enhanced improvements to community infrastructure and the public realm as a result of increased Section 106 contributions. Furthermore, increased contributions could also contribute to enhanced management of existing green infrastructure. It is important to note that there is a significant level of uncertainty at this stage.
- 6.5 The increased density is also positive in terms of the housing topic as there is the potential to deliver a greater number of new homes within Harlow and allow for more flexibility should some sites not come forward or their capacity be less than expected. However, there is the potential that the increased densities could make it more difficult deliver a suitable mix of market and affordable homes, in particular family homes. It is also possible that the contributions required to deliver the necessary infrastructure to support the increased levels of development and mitigate for potential impacts (explored below) could affect the viability of these eight brownfield sites. As mentioned above, there is a significant level of uncertainty at this stage.
- 6.6 The appraisal found that Option C is preferred in relation to the housing and economy topics given the increased level of growth. The difference in the overall level of growth between Options A and B is less significant so they are ranked similarly against these topics.
- 6.7 The appraisal found that Option B and in particular Option C performed less well against SA topics relating to the historic environment and landscape. For the purposes of the appraisal it was assumed that the increased density proposed through Option B and in particular Option C would result in a built form that is generally higher than the surrounding areas. This could have long term negative effects on the character of these areas and therefore the townscape and historic environment. The appraisal identified this as a particular issue for the Princess Alexandra Hospital (HS2-1) and Elm Hatch and Public House (HS2-14) sites given the presence of designated heritage assets, including a Conservation Area, Scheduled Monuments and Listed Buildings. The increased density could also reduce the level of open/green space being delivered on the eight brownfield sites. As highlighted earlier in this SA Report, areas of open/green space are fundamental to the character of the town.
- 6.8 While increased Section 106 contributions as a result of a higher level of growth could possibly deliver enhanced improvements to the historic environment, townscape and existing green infrastructure this is uncertain at this stage. Ultimately the nature and significance of effects in relation to the landscape and historic environment are uncertain as they will be dependent on the precise design and layout of development as well as mitigation measures delivered. The appraisal found that Option A is preferred in relation to landscape and the historic environment.
- 6.9 Option A seeks to deliver the preferred approach agreed through the MoU (March 2017) for the distribution of housing growth across the HMA. There is also a signed MoU (February 2017) committing the relevant stakeholders, including Harlow District Council, to deliver the necessary transport infrastructure improvements to deliver the agreed level of growth across the HMA. Taking this into account the appraisal found that Option A would not result in a significant negative effect on SA topics relating to transport, air quality and climate change. Option B would result in an increase of 804 dwellings and Option C an increase of 2,383 dwellings compared to Option A. While Option B is likely to have a greater impact on traffic compared to Option A, the appraisal considered that this is likely to be minimal and not of significance in terms of differentiating between them. The level of growth proposed through Option C is more likely to substantially increase the levels of traffic. At this stage it is not known if further improvements to transport infrastructure are possible and could be delivered to accommodate the associated increase in traffic with Option C.

- 6.10 The appraisal also noted that there were positive aspects to Options B and C as they propose further growth close to the town centre, local centres (Hatches) as well as sustainable transport corridor nodes. This could help to reduce reliance on the private vehicle and encourage a modal shift; however, again this is uncertain at this stage.

7. Developing the preferred approach

Introduction

- 7.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal/the Council's reasons for developing the preferred strategy in-light of alternatives.

The Council's outline reasons

- 7.2 The Council has identified its preferred spatial approach for housing and employment allocations based on various technical documents and discussions with stakeholders and developers. Housing sites were allocated based on a detailed site selection process as set out in the Council's Strategic Housing Land Availability Assessment (SHLAA) 2014 having considered existing constraints, the deliverability and developability of sites and the original Master Plan for Harlow as prepared by Sir Frederick Gibberd.
- 7.3 The original Master Plan for Harlow, the town's tight administrative boundaries and other environmental constraints including the River Stort and topography mean that the number of site options and therefore spatial alternatives for housing is limited. The site selection process for the SHLAA identified 369 potential development sites but after a sieving process this reduced to 59 developable sites. These sites include greenfield land identified for release from the Green Wedge network and Green Belt as recommended in associated evidence base studies. The preferred approach has resulted in a mix of small, medium and large sites dispersed across the town and includes greenfield land and brownfield land as well as sites identified for regeneration. It also includes a large strategic housing site proposed for Green Belt release which will provide approximately 2,600 homes. This site will help achieve the critical mass needed to regenerate the town and support strategic infrastructure requirements.
- 7.4 The Council considered the potential for developing further greenfield land, namely parts of the Green Wedge network. However, this would have significant consequences on the role and function of the green infrastructure network of Harlow, impacting on the availability of open space for Harlow residents and detracting from the purposes of the original Master Plan for Harlow. The Council has considered increasing densities across particular sites as set out in Chapter 5 of this SA Report as the only reasonable alternative to the preferred approach. These alternative scenarios would increase densities at sites close to sustainable transport nodes, on sites close to the town centre due to access to services and facilities and at hatches where additional housing could support regeneration. It must be noted that the SHLAA process has already applied higher densities to such sites albeit on a lower scale (justification for this approach is outlined in the 2014 SHLAA document).
- 7.5 Increasing densities would increase the housing supply across Harlow and the HMA as a whole; however, the local plan is already providing more homes than the OAHN in order to bring forward regeneration opportunities and affordable housing provision. Increasing densities on the sites identified in Table 5.3, either through Options B or C, would have the following negative effects for Harlow:
1. In order to achieve higher densities, developments would have to build flatted schemes due to land capacity constraints. It is evident from planning applications, appeal decisions and viability evidence prepared for the Local Plan that most flatted schemes in Harlow are unable to provide affordable housing (a significant issue in Harlow as set out in the SHMA) and planning contributions towards infrastructure.
 2. Without the provision of planning contributions towards infrastructure, the Council is unable to bring forward improvements to the public transport network, the provision of education and healthcare facilities and other important services to make Harlow a sustainable place. It will place pressure on existing infrastructure provision in Harlow.
 3. Most sites are located in existing built-up areas within close proximity of homes. Flatted schemes, particularly high-rise which are needed to achieve Option C densities, are likely to have significant impacts on the amenity of residents and amenity of the topography and

landscape of Harlow and countryside surrounding Harlow. It will also impact on the design and layout of existing streets in Harlow in contrary to the original Master Plan for the town.

- 7.6 The Council's future employment needs will continue to be delivered on existing employment sites and through the Enterprise Zone sites which are still considered to be the most sustainable locations having regard to the availability of land and the need for other facilities and services and housing. The Council will continue to seek measures to maximise employment land in existing sites and retain employment provision.
- 7.7 It is considered that the preferred approach acknowledges the existing constraints in Harlow, the original Master Plan for the town and the role and function of the land within it. It provides opportunities for regeneration and greenfield development and considers the viability of sites to deliver affordable housing and infrastructure. It also provides the correct level and spatial distribution of growth to bring about transformational change to Harlow, enhance its role as a strategic hub within the London Stansted Cambridge Corridor and deliver sustainable growth supported by the correct levels of infrastructure. The preferred approach is also in line with the signed MoU for the distribution of OAHN across the West Essex and East Hertfordshire HMA.

Part 2: What are SA findings at this current stage?

8. Introduction (to Part 2)

- 8.1 The aim of this chapter is to present an appraisal of the Draft Pre-Submission Local Development Plan (hereafter referred to as the 'Draft Plan'), as currently published under Regulation 19 of the Draft Planning Regulations.

Methodology

- 8.2 The appraisal identifies and evaluates 'likely significant effects' of the Draft Plan on the baseline, drawing on the sustainability topics/objectives identified through scoping (see **Table 2.1**) as a methodological framework. In total, there are eleven topics relating to:
- Air quality
 - Biodiversity and green infrastructure
 - Climate change
 - Community and wellbeing
 - Economy and employment
 - Historic environment
 - Housing
 - Land and waste
 - Landscape
 - Transport
 - Water
- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.³¹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative/ in-combination effects are also considered, i.e. the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/accessibility).

Adding structure to the appraisal

- 8.5 Whilst the aim is essentially to present an appraisal of 'the plan' under each of the SA objective headings,³² it is appropriate to also give stand-alone consideration to elements of the Plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to distinct elements of the Plan, before the discussion under a final sub-heading concludes on the Draft Plan as a whole.
- 8.6 Within these narratives, specific policies are referred to only as necessary (i.e. it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability topic/objective).

³¹ Environmental Assessment of Plans and Programmes Regulations 2004

³² Regulations require simply an appraisal of 'the plan'.

9. Appraisal of the Draft Plan

Introduction

- 9.1 As introduced above, the aim of this chapter is to present an appraisal of the Draft Plan under the SA topics, which are closely linked to the SA framework.

Air quality

Commentary on the spatial strategy

- 9.2 Air pollution in Harlow is considered to be generally low, with monitoring concluding that there are no areas where the air quality has led to the designation of an Air Quality Management Area (AQMA).³³ The trend across all monitored sites indicates that air quality is improving in the District, and the spatial strategy seeks to maintain this position, focusing development at the Strategic Housing Site East of Harlow. The site makes provision for around 2,600 homes and associated infrastructure, forming one part of the four strategic Garden Town Communities surrounding Harlow. A Master Plan is to be produced for the East of Harlow site, based on the Garden Town Charter in partnership with the Council and other stakeholders. Through this, the spatial strategy seeks to create a step change in modal shift by contributing to the delivery of the Sustainable Transport Corridors, which are a key element of the 'garden settlement' approach, and will help establish an integrated, accessible and safe transport system. This will maximise 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.
- 9.3 Focusing development in the east of the District will have good access to public transport and services/facilities through the provision of infrastructure as per Policy HS3 (Strategic Housing Site East of Harlow), therefore contributing towards reducing dependency on the car. However, while there are no AQMA's designated in the District, it is recognised that traffic emissions are the most significant source of air pollution in the District.³⁴ By focusing housing and employment provision in the east, development has the potential to increase pressure on key transport corridors, exacerbating congestion problems where they exist.
- 9.4 It is recognised that Harlow and Gilston Garden Town Community lies in the core area of the 'London Stanstead Cambridge Corridor' (LSCC), one of the most important and fastest growing economic growth areas in the country. The cumulative effect of proposed development in the HMA on the highways network was considered through the Strategic Spatial Options Study, which explored and identified options for spatially distributing the housing need across the HMA. This work was also informed by transport modelling.³⁵ A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A), which will improve the flow of traffic east to west across the District and provide a catalyst for further development, promoting Harlow as a growth location along the M11 corridor. The Council will also 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.
- 9.5 In terms of the impact on Epping Forest SAC, due to the large distances involved, the HRA (2017) concluded that no site allocations (either employment or residential), would affect the integrity of the European site in isolation, however in combination effects require further consideration. The HRA discusses the traffic modelling and air quality impact assessment undertaken to support the assessment of the different HMA options as part of the Strategic

³³ Harlow District Council (2017) Air Quality Annual Status Report
http://www.essexair.org.uk/AQInEssex/LA/Harlow.aspx?View=reports&ReportType=Harlow&ReportID=Harlow_2017_ASR&StartIndex=1&EndIndex=7

³⁴ Ibid.

³⁵ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

Spatial Options Study.³⁶ As a result of that modelling and broader discussion with Natural England and City of London Corporation, the HMA authorities agreed that a mitigation strategy should be devised³⁷ in relation to Epping Forest SAC. Since that commitment was made governance arrangements are in place and traffic modellers have been working on potential traffic mitigation scenarios. A programme of long-term air quality monitoring is also being planned within input from the City of London Corporation. This will be useful in air quality model verification but its main value will be in tracking the expected improvement in emissions over the plan period. This can feed into any regular reviews of housing/employment quantum and mitigation measures over the plan period.

Commentary on other policies

- 9.6 Policy PL9 (Pollution and Contamination) requires that all development must minimise and, where possible, reduce all forms of pollution and contamination. This includes impacts on air quality. The policy seeks to ensure that development proposals set out an appropriate scheme of mitigation, where pollution/contamination-generating development would otherwise result in an unacceptable impact on neighbouring uses, environment or biodiversity.
- 9.7 Policy WE1 (Strategic Green Infrastructure) recognises that Green Infrastructure (open spaces, landscaping, trees and hedgerows) contribute positively towards reducing air pollution through assisting carbon sequestration. The policy therefore seeks to protect and enhance the wealth of Green Infrastructure within the District, while also requiring that new Green Infrastructure be planned into new development.
- 9.8 Policy IN1 (Development and Sustainable Modes of Travel) seeks to minimise the need to travel, promote opportunities for sustainable transport modes, and improve accessibility to local facilities and linkages with the surrounding pedestrian and cycle network. This will help to reduce reliance on the private vehicle and encourage the use of more sustainable modes of travel with the potential for a long-term positive effect by helping to reduce atmospheric pollution.
- 9.9 Further sustainability initiatives promoted through Policy IN1 include requiring that development provide electric vehicle charging points (EVCPs) in accordance with the latest government guidance.
- 9.10 Policy IN2 (Impact of Development on the Highways Network including Access and Servicing) further seeks to support the transition to a low carbon future through improving road congestion and facilitating sustainable movement. In this context, the policy recognises that in accordance with national policies and guidance, it may be necessary for an application to be accompanied by either a Transport Statement or Transport Assessment; depending on the degree of the proposal's impact on highway users and movement in the local area generally. The Council will consult with the Local Highway Authority and other bodies on the Transport Assessment or Statement.
- 9.11 Policy IN3 (Parking Standards) requires that vehicle parking must be provided in accordance with the adopted Essex Vehicle Parking Standards³⁸, unless otherwise indicated elsewhere in the Draft Plan and/or supporting documents. The Parking Standards provide a rigorous approach to parking, accessibility and promoting travel choice. The policy therefore seeks to reduce reliance on the car and promote more sustainable modes of travel while ensuring that on-street parking issues are not created.

³⁶ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

³⁷ The MoU states that *'It is intended this Joint Strategy will be in agreed and published prior to the determination of any of the planning applications on sites around Harlow that are part of The Spatial Option detailed in the "Distribution of OAN across West Essex and East Hertfordshire" MoU. If the Joint Strategy is not in place when planning applications are submitted, applicants will be required to submit the necessary information to ascertain whether any adverse impacts will be caused in Epping Forest, and if necessary any mitigation measures that may be necessary'*.

³⁸ Essex County Council (2009) Parking Standards: Design and Good Practice.

Appraisal of the plan as a whole

- 9.12 Air quality in Harlow currently meets the national Air Quality Objectives, and as such, Harlow Council does not have an Air Quality Strategy or Action Plan. However, through the Draft Plan, the Council prioritises a clean and green environment, adopting a number of policies which are focused on reducing the District's carbon footprint and improving air quality.
- 9.13 It is likely that significant new developments in the Harlow area will result in traffic growth within Harlow and along key transport corridors, in particular the M11 and A414. The Plan aims to safeguard the environment from harmful development that may affect air quality through strategic level master planning for the Garden Town Communities. Measures to be implemented include the proposal for a new junction 7a on the M11, which is anticipated to reduce the anticipated strain on the local and wider road network, creating a significant change to how vehicles would access Harlow. A number of preliminary traffic options have also been identified through the Plan to reduce the volume of vehicles on the road, including preventing HGVs using smaller residential roads moving to priority routes.
- 9.14 In the context of Epping Forest SAC, the HRA (2017) considers that the Plan's firm commitment to the development of mitigation strategies to address air quality around Epping Forest, the commencement of work on those solutions, the agreement to a deadline for devising those strategies, and the authorities' (West Essex and East Hertfordshire HMA Local Authorities, Essex and Hertfordshire County Councils, City of London Corporation and Natural England) commitment to monitor the efficacy of those strategies provides a sufficient framework to ensure no adverse effect will arise from air quality on the integrity of the SAC.
- 9.15 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline. It is recognised that the updating of traffic and air quality modelling and the testing and securing of specific mitigation measures will clearly be an iterative process.

Biodiversity and Green Infrastructure

Commentary on the spatial strategy

- 9.16 In terms of biodiversity constraints, there are no European sites located within the District boundary. However, there are four European sites that lie beyond the District boundary but are within the influence of the Draft Plan and where there is the potential for impacts. These are Epping Forest SAC, Lee Valley SPA and Ramsar site, and Wormley-Hoddesdonpark Woods SAC.
- 9.17 The potential effect of the Draft Plan, both alone and in combination, on European sites has been considered through the Habitats Regulations Assessment (HRA) process. The HRA recommended that to enable surrounding HMA authorities and MoU signatories to provide the quantum of housing identified within the West Essex/ East Hertfordshire HMA in proximity to Harlow, the garden communities being created around Harlow should deliver a suitably large amount of natural accessible greenspace to maximise their recreational self-sufficiency. Ultimately the quantum of Green Infrastructure required and achievable will be dependent on the layout of these larger developments and detail will need to be established for individual planning applications. This is a recommendation regarding practical design and implementation of these developments, rather than for the Local Plan itself. It matches recommendations made to Epping Forest District Council through the HRA for their Local Plan.
- 9.18 The HRA acknowledges that the Harlow Local Plan will not affect the integrity of Epping Forest SAC via atmospheric pollution in isolation, but an adverse effect in combination was identified without delivery of mitigation, although Harlow are likely to be a more minor contributor than authorities closer to the SAC. The Council already provides a policy hook to address these issues in combination with neighbouring authorities via the cross boundary MoU³⁹ and the resulting mitigation strategies currently being developed. The strategic transport model is to be rerun and subsequent air quality modelling undertaken prior to commencement of the examination. The modelling will reconfirm the contribution that the plan will provide to atmospheric pollution in Epping Forest and thus its relative contribution to the mitigation strategy. In addition to the reference in the text of the plan, the HRA recommends that the Local Plan also provide explicit policy reference to the strategic framework in place to address air quality at Epping Forest, including specific reference to a multi-authority mitigation strategy and a timetable for the production of that strategy (e.g. prior to adoption). This will enable the Council to make contributions to the strategic mitigation that is proportionate to the Plans atmospheric pollution contributions. With the implementation of this recommendation, the HRA concluded that the Plan and associated Council initiatives (such as the MoU and resulting mitigation strategies) would present a sufficiently robust framework to ensure that the Plan will not affect the integrity of sensitive European sites, although the detailed development of a mitigation strategy is ongoing.
- 9.19 The HRA concluded that provided that the above recommendation is incorporated into the LDP, and the traffic and air quality modelling are updated as discussed and demonstrate that mitigation measures are sufficient to address potential adverse effects on the SAC, it can be concluded that the Harlow LDP has a suitable framework in place to ensure that development delivered will not affect the integrity of any European sites either alone or in combination.⁴⁰
- 9.20 It should also be noted that the cumulative or in combination effects of proposed development within the HMA on Epping Forest SAC and the Lee Valley SPA/Ramsar were also considered through the HRA process undertaken with respect to the HMA Strategic Spatial Options Study. This considered: disturbance from recreational activities and urbanisation; atmospheric pollution; water abstraction; and water quality.⁴¹
- 9.21 In terms of recreational pressures, whilst significant effects from the HMA options considered were not anticipated on the European sites, it was recommended that all new development

³⁹ Memorandum of Understanding on managing the impacts of growth within the West Essex / East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation (draft September 2016)

⁴⁰ Harlow Council (2018) Habitats Regulations Assessment Report. Prepared by AECOM.

⁴¹ Ibid.

- should deliver greenspace in-line with the Natural England Alternative Natural Greenspace (ANG) standard to ensure self-sufficiency. In relation to air quality, it was considered that the options considered would not lead to a likely significant effect upon the European sites either alone or in combination with other projects or plans. In relation to water abstraction, it was concluded that delivery of the options would not result in adverse effects on the Lee Valley SPA/Ramsar site through excessive water drawdown, either alone or in combination with other plans and projects. It was also evaluated that there would not be a water quality effect from the options on Lee Valley SPA/Ramsar site either alone or in combination with other projects and plans.
- 9.22 There are two Sites of Special Scientific Interest (SSSIs) that fall within the District Boundary. A small portion of Hunsdon Mead SSSI in the North West and Harlow Woods SSSI in the South. The District also falls within Impact Risk Zones (IRZs) for a number of other SSSIs. IRZs are defined by Natural England (NE) provide an indication of the type and scale of development within that area that could have an impact on a SSSI based on its sensitivities.
- 9.23 A number of site allocations proposed within the Draft Plan fall within IRZs where residential developments of 50 units or more could pose a risk to a SSSI. Some of the proposed allocations exceed this threshold and consultation with Natural England would therefore be required.
- 9.24 Development proposed in the Draft Plan is most likely to result in impacts on SSSIs that fall within the District boundary. No allocations are proposed within 1.3km of the Hunsdon Mead SSSI so it is considered unlikely that significant effects would arise as a result of the Draft Plan alone. In terms of cumulative effects, these are most likely to arise as a result of the delivery of the Gilston Garden Town Community through the East Herts Draft Plan to the North of Harlow. It is unlikely that recreational activity at the sites would increase significantly given the barrier to movement presented by the A414 and the River Stort. The SSSI is not within 200m of the A414 so will not be directly impacted by increased atmospheric pollution from increased traffic and there is planned mitigation to be delivered in terms of transport infrastructure. There are also not likely to be any significant effects in relation to water quality or levels at the site once mitigation proposed through the Draft Plans has been taken into account.
- 9.25 There is one allocation (HS2-9 (Land east of 144-145 Fennells)) proposed in close proximity to Harlow Woods SSSI and Ancient Woodland. Harlow Woods is comprised of three adjacent ancient semi-natural woods, which are assessed by NE as having an unfavourable recovering (53.95%) and a favourable (46.05%) condition status. Details on the site indicate that the site level management of the woodland is the most important aspect in maintaining a favourable condition status.⁴² There are no PRoW running through the site and the designated areas are adjacent to an existing recreation ground providing an alternative area for recreation. The SSSI is not near a major road that is likely to see a significant increase in traffic so impacts as a result of increased traffic and atmospheric pollution are not predicted. There are also not likely to be any significant effects in relation to water quality or levels at the SSSI once mitigation proposed through the Draft Plan has been taken into account. Taking the above into account it is considered that there is unlikely to be a significant effect either alone or cumulatively on the Harlow Woods SSSI once mitigation measures proposed through Draft Plan policies have been taken into account.
- 9.26 Allocation HS2-7 (Kingsmoor recreation Centre) is adjacent to Burnett Wood which is designated as Ancient Woodland. Mitigation measures proposed through Draft Plan policies, including a suitable buffer between any development and the Ancient Woodland should minimise any potential impacts as a result of proposed development.
- 9.27 In terms of locally designated sites, there are a number of Local Wildlife Sites (LWSs) within the District. The larger LWSs are located in the North and South of the District as well as centrally following the Green Infrastructure/Wedges. It is noted that Hawkenbury Meadow LWS is located in Great Pardon, in close proximity to individual site allocations. However, due to the existing urban environment surrounding the LWS, it is not expected that development would lead to adverse effects on the designated site. Development proposed as part of the East of Harlow Strategic Site is adjacent to the North and South of the Feltimore Meadow LWS.

⁴² Natural England Designated Sites View. <https://designatedsites.naturalengland.org.uk/>

Feltimore Meadow coincides with an area of Green Wedge, and is expected to be sufficiently protected through the Draft Plan policies.

- 9.28 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. The spatial strategy is underlined by the need to support the creation of continuous wildlife corridors extending throughout the sub-region, and minimise the risk of habitat fragmentation and/or loss through the development of the Garden Town Communities and also individual sites. This is reiterated through the Green Infrastructure Plan for the Harlow Area (2005), which the Hertfordshire Green Infrastructure Plan (2011) identifies as an “existing initiative” that should be taken into account.⁴³

Commentary on other policies

- 9.29 Policy WE1 (Strategic Green Infrastructure) provides for the protection and enhancement of existing green infrastructure, requiring that new Green Infrastructure must be planned into new development.
- 9.30 Policy WE2 (Green Wedges and Green Fingers) ensures that development will provide for Green Wedges and Green Fingers, recognising their role is to provide multi-functional Green Infrastructure, including open spaces for sport, recreation and quiet contemplation, wildlife corridors, footpaths, cycleways and bridleways.
- 9.31 Policy WE3 (Biodiversity and Geodiversity) proposes that all biodiversity and geodiversity assets in the District will be preserved and enhanced. It is noted that it is recommended within the HRA (2017) that *“this policy also provides for the protection of internationally designated wildlife sites both within and outside of the District as impact pathways stemming from Harlow have the potential to interact with European sites located within surrounding authorities”*.⁴⁴
- 9.32 Policy SIR1 (Infrastructure Requirements) ensures the delivery and timely provision of new infrastructure to support development. This includes the delivery of new allotment provision which will improve biodiversity in the area.
- 9.33 Policy SIR2 (Enhancing Key Gateway Locations) plans for the enhancement of gateways. The gateway locations identified will be seamlessly integrated within the wider transport and green infrastructure network of Harlow and enhanced and improved.
- 9.34 Policy PL6 (Trees and Hedgerows) aims to protect the trees and hedgerows in Harlow. The policy implements a set of criteria to assess development where adverse effects on existing trees are hedges are expected, supporting development only where adverse effects are not predicted.
- 9.35 Policy PL7 (Green Infrastructure and Landscaping) further seeks to provide for the protection and enhancement of GI. The requirements of the 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, therefore contributing to enhancing and conserving the environment.
- 9.36 Policy L1 (Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development) identifies the need for major development to provide public open space and other outdoor amenities which have the potential to divert recreational activity away from sensitive designated sites.
- 9.37 Policy L2 (The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities) relates to the provision and loss of recreational, sporting, cultural and community facilities. It is noted that the provision of recreational facilities has the potential to reduce recreational pressure on sensitive designated sites, whilst the loss of it could increase recreational pressure. Loss of recreational facilities will only be supported under certain criteria.

⁴³ Land Use Consultants (2011) Hertfordshire Strategic Green Infrastructure Plan

⁴⁴ Harlow Council (2018) Habitats Regulations Assessment Report. Prepared by AECOM.

Appraisal of the Draft Plan as a whole

- 9.38 The HRA process concluded that the development proposed through the Draft Plan will not have an adverse effect on any European sites, either alone or in combination. This conclusion is dependent on a number of recommendations, including the recommendation that the Local Plan also provide explicit policy reference to the strategic framework in place to address air quality at Epping Forest, including specific reference to a multi-authority mitigation strategy and a timetable for the production of that strategy (e.g. prior to adoption). This will enable the Council to make contributions to the strategic mitigation that is proportionate to the Plans atmospheric pollution contributions.
- 9.39 The Draft Plan proposes a number of allocations that are in close proximity to a SSSI (or fall within Impact Risk Zones for a SSSI), Ancient Woodland and/or Local Wildlife Site. The appraisal concluded that given the sensitivities of the designated sites, scale of proposed growth and mitigation provided through Draft Plan policies as well as the development management process that there will not be any significant effects either alone or cumulatively.
- 9.40 The loss of greenfield land in the East of the District and surrounding Harlow through the delivery of the Garden Town Communities, in Epping Forest and East Herts, has the potential for a cumulative negative effect on biodiversity through habitat loss and fragmentation. Policies within the Draft Plan seek to ensure Green Wedges, and the wider Green Infrastructure Network continues to provide ecological corridors for wildlife, which helps to reduce the significance of the effect to a certain extent. It will be important for a connected Green Infrastructure network that runs through Harlow as well as the surrounding Garden Town Communities. 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 the network of Green Wedges and Green Fingers, which are key physical features of Harlow that have shaped its subsequent growth.
- 9.41 It is recognised that there is the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations. However, on balance it is appropriate to conclude **uncertain long term minor negative effects** at this stage.

Climate Change

Commentary on the spatial strategy

- 9.42 With regards to climate change mitigation, key issues include the need to capitalise upon opportunities to design-in low carbon infrastructure to development from the outset, and therefore minimise additional CO₂ emissions associated with development. There is also the need to reduce car dependency and distance travelled by private car and therefore per capita transport related CO₂ emissions; planning has an important role to play in this regard.
- 9.43 Harlow Council recognises the importance of reducing its carbon footprint and the use of resources across the District. This is evidenced through the Harlow Carbon Management Plan⁴⁵, where the Council have set a target of reducing its carbon emissions by a 25% by 2020/21. This includes emissions from industry and the commercial sector, domestic emissions and those from road transport. In this context, the proposed Garden Town Communities, which includes the East of Harlow Site (Policy HS3), will provide opportunities to promote high environmental standards in terms of energy efficiency, design, and low-carbon energy.
- 9.44 Excluding the East of Harlow allocation, the proposed development at Princess Alexandra Hospital (650 dwellings) could provide an opportunity to deliver a Combined Heat and Power (CHP) scheme. Notwithstanding the uncertainty, the delivery of a scheme such as this would contribute positively towards reducing CO₂ emissions from the built environment.
- 9.45 In relation to reducing CO₂ emissions from transport, the preferred spatial strategy has some merit as development is focused around Harlow, where there is good access to public transport and services/facilities, and therefore good potential to support modal shift away from car use. However, it is recognised that development is likely to increase vehicular use of key transport corridors, notably the M11 and A414. Therefore, considering the scale and nature of the Harlow and Gilston Garden Town, a number of infrastructure and statutory requirements will be met by each of the four Garden Town Communities. Looking specifically at the Strategic Housing Site East of Harlow; infrastructure and statutory requirements will be met on the site for the benefit of residents and off-site to mitigate the impacts of the development. This includes local highway solutions and improvements to Harlow's sustainable transport network.
- 9.46 In terms of flood risk, the River Stort runs through the District, east to west along its northern boundary. The preferred strategy performs well in respect of avoiding the floodplain of the River Stort, directing a large proportion of growth to the east of the District. Fluvial flood risk has been a clear focus of the site selection process, with development following a risk-based and sequential approach, so that it is located in the lowest flood risk area. 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 spatial strategy requires that development provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment. The Strategic Housing Site East of Harlow in particular contains small areas of Flood Zone 2 and 3 (of high risk of flooding). In line with the spatial strategy, development will resolve any flood risk issues, both on-site and downstream/upstream.
- 9.47 Surface water flood risk is an important issue for the District. Policy PL10 (Water Quality, Water Management, Flooding and Sustainable Drainage Systems) aims to prevent this through the use of sustainable drainage systems in new development, in line with the Harlow Surface Water Management Plan⁴⁶ and the Essex SuDS Design Guide⁴⁷.
- 9.48 It is considered likely that suitable mitigation is available to address any significant surface water flooding issues and ensure that any residual effects are neutral.

⁴⁵ Harlow District Council (2016) Harlow Carbon Management Plan.

⁴⁶ Capita Symonds (2013) Harlow Surface Water Management Plan.

⁴⁷ Essex County Council (2016) Sustainable Drainage System Design Guide. <http://flood.essex.gov.uk/new-development-advice/how-to-design-suds-in-essex>

Commentary on other policies

- 9.49 There are a number of policies that will help to minimise per capita CO₂ emissions from transport as well as per capita CO₂ emissions from the built environment.
- 9.50 Policy IN1 (Development and Sustainable Modes of Travel) seeks to minimise the need to travel, promote opportunities for sustainable transport modes, and improve accessibility to local facilities and linkages with the surrounding pedestrian and cycle network. This will help to reduce reliance on the private vehicle and encourage the use of more sustainable modes of travel with the potential for a long-term positive effect by helping to reduce greenhouse gas emissions.
- 9.51 Policy IN2 (Impact of Development on the Highways Network including Access and Servicing) further seeks to support the transition to a low carbon future through improving road congestion and facilitating sustainable movement. In this context, the policy recognises that in accordance with national policies and guidance, it may be necessary for an application to be accompanied by either a Transport Statement or Transport Assessment; depending on the degree of the proposal's impact on highway users and movement in the local area generally. The Council will consult with the Local Highway Authority and other bodies on the Transport Assessment or Statement.
- 9.52 Policy PL9 (Pollution and Contamination) requires that all development must minimise and, where possible, reduce all forms of pollution and contamination. This includes impacts on air quality. The policy seeks to ensure that development proposals set out an appropriate scheme of mitigation, where pollution/contamination-generating development would otherwise result in an unacceptable impact on neighbouring uses, environment or biodiversity.
- 9.53 Policy PL3 (Sustainable Design, Construction and Energy Use) encourages the incorporation of low carbon and renewable energy measures in new and existing development, which includes integrating passive ventilation such as wind catchers, and the use of local, sustainable, and energy efficient materials. This is supported by policy PL1 (Design Principles for Development) which expects a high standard or urban and architectural design for all development.
- 9.54 Policy PL10 (Water Quality, Water Management, Flooding and Sustainable Drainage Systems) ensures that all proposals for new development must follow a risk-based and sequential approach so that it is located in the lowest flood risk area. It also requires all development proposals within Flood Zone 2 and Flood Zone 3 to be appropriately flood resilient and resistant, including provision of safe access and escape routes where required, and that any residual risk can be safely managed. Also, all proposals for new development will be required to manage and reduce surface water run-off. Where a sustainable drainage system is required, the drainage scheme must provide appropriate attenuation taking into account climate change.

Appraisal of the Draft Plan as a whole

- 9.55 Whilst housing growth in itself does not give rise to concerns regarding climate change mitigation, there is a need to minimise per capita emissions. This means distributing housing to locations where car dependency and the need to travel long distances by car are minimised (with 'modal shift' support), and supporting larger, strategic-scale development schemes that give rise to the greatest opportunity to design-in low carbon infrastructure. In both respects the preferred spatial strategy performs well, and policies are set in place to encourage sustainable travel, promote growth in sustainable locations, and encourage best practice in building design that will promote energy conservation. Nonetheless, there is always the potential to 'go further', and climate change mitigation should be a focus of ongoing work (e.g. to ensure that adjacent development sites coordinate efforts).
- 9.56 In terms of climate change adaptation, the development management policies seek to ensure that water management; flooding and sustainable drainage is fully considered as part of new development proposals. While the presence of the River Stort does give rise to concerns, to minimise the issue, the Plan requires that new development is directed to areas of lowest flood risk. Additionally, where sites are at risk of flooding, the most vulnerable parts of the proposed development must be located in areas of lowest flood risk. It is recognised throughout the Plan

that surface water flooding is also a constraint for the District, and as such development proposals 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. The Plan also requires the implementation of integrated and maintainable SuDS in new development that achieves multiple flood risk benefits.

- 9.57 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.⁴⁸

⁴⁸ In relation to climate change mitigation, there is very little potential to conclude that a Draft Plan will result in significant effects, recognising the climate change mitigation is a global issue.

Community and Wellbeing

Commentary on the spatial strategy

- 9.58 Harlow is a relatively deprived District, and as such, priority issues relate to the need to address pockets of relative deprivation locally; plan for an ageing population; and ensure that new and existing communities have adequate access to community infrastructure, including health and education facilities.
- 9.59 The District's Infrastructure Delivery Plan (IDP) (2017) sets out the key infrastructure requirements to support the proposed growth for the District as identified in the Draft Plan.⁴⁹ Accordingly, Policies IN1 to IN6 set out the policies by which the Council will seek to ensure that investment in infrastructure keeps pace with growth. The spatial strategy directs development to the east of Harlow, developing the Harlow and Gilston Garden Town. Focussed growth around Harlow through the delivery of Garden Town Communities is supported given the good accessibility to facilities, services, and employment, and also the opportunity to deliver new community infrastructure. This is identified within the IDP (2017) and is set to include transport infrastructure, education, health care provision, utilities, and social care provision to support new and existing communities.
- 9.60 Garden Town status, and associated government funding means that there is an opportunity in respect of well-planned and high quality new development that meets the needs of the community. The design, development and phased delivery of each Garden Town Community must accord with principles set out in Policy HGT1 (Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town). This includes the securing of high-quality place making, and ensuring the timely delivery of on-site and off-site infrastructure to address the impact of the new Garden Town communities. To further meet community needs, and in the interest of transparency, the spatial strategy promotes community and stakeholder involvement in the design and delivery from the outset and the delivery of a long-term community engagement strategy.
- 9.61 There will be further long-term positive effects for communities through the delivery of development and revitalisation of Harlow Town Centre. The Harlow Town Centre Area Action Plan (AAP) is investigating opportunities to provide commercial-leisure and entertainment facilities in order to develop both a day-time and night-time economy in the town centre. This will positively develop the local community, improving the attraction of the town for residents and visitors. 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 the City of Chelmsford, by having an improved retail offer, new commercial leisure provision, an enhanced physical environment and more business space.
- 9.62 Harlow was built around a series of neighbourhoods, dissected by large areas of natural and semi-natural space, now known as Green Wedges, which are key physical features of Harlow that have shaped its subsequent growth. The spatial strategy places focus on improving the health and wellbeing of residents through protecting and enhancing its Green Wedges, and associated Green Infrastructure network. While site allocations within the town centre utilise previously developed land, there is set to be some small areas of loss of open space. The allocation of sites has been informed by the Open Space and Green Infrastructure Study (2013) and where possible development is focussed on open space that is low value and quality.⁵⁰
- 9.63 It is also recognised that high levels of growth outside of the settlement through the delivery of the Garden Town Communities has the potential to result in damage to/ loss of Green Infrastructure. Policy HGT1 (Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) and other policies within the Plan seek to ensure that footpaths, cycleways, bridleways and other green routes, will be protected and enhanced, ensuring they are safe, accessible and well connected to services and facilities. This is in accordance with the recommendations of the Harlow Open Space Study (2013), the Green Infrastructure Plan for the Harlow Area (2005), and the IDP (2017).

⁴⁹ Harlow Council (2017) Delivery Study for Harlow and Surrounding Area: Infrastructure Delivery Plan

⁵⁰ Harlow Council (2013) Open Space and Green Infrastructure Study. Prepared by LUC.

Commentary on other policies

- 9.64 The majority of policies in the Draft Plan will affect this topic in some way, either directly or indirectly, by helping to meet the needs of communities. The policies of particular importance are identified below.
- 9.65 Policy HGT1 (Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) has already been discussed, above. It sets out a range of principles to ensure that growth is supportive of community aspirations, with benefits felt by both new and existing communities.
- 9.66 Policy H6 (Housing Mix) ensures that a range of housing types and sizes, across a range of tenures, must be provided in major residential development, and that community-led housing development will be supported on appropriate sites. In this context, Policy H8 (Affordable Housing) sets out the requirements for the provision of affordable homes in all major development.
- 9.67 Policy HS4 (Gypsies and Travellers) seeks to fulfil the needs of the District's Gypsy, Traveller and Travelling Showpeople community. The policy will provide over and above the 9 pitches required, restoring 12 pitches at Fern Hill Lane site. Development Management policy H10 (Travellers Pitches and Plots) further ensures that where additional pitches/plots may be required, development will:
- 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, or designated and locally identified habitats;
 - Be within a reasonable distance of shops, schools, healthcare and other community/leisure facilities; and
 - Provide safe and convenient vehicular access to the local highway network, together with adequate space to allow for the parking and movement of vehicles.
- 9.68 PL1 (Design Principles for Development) requires a high standard of urban and architectural design, where development proposals meet the diverse needs of people, improves the public realm, and reduce the risk of crime and the fear of crime. Furthermore, development proposals must protect and enhance local distinctiveness, provide appropriate, legible and safe connections with surrounding streets, neighbouring development and Green Infrastructure, and integrate with sustainable modes of transport. In this context, Policy PL2 (Amenity Principles for Development) further supports development which preserves and/or improves the level of amenity in the local area.
- 9.69 In terms of community facilities, Policy L1 (Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development) and Policy L2 (The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities) propose that the above listed facilities are required and supported, together with their management and maintenance. Development is required to address the needs arising from the proposal, and ensure that facilities are easily accessible by all sectors of the community, by both public and private transport.
- 9.70 Policy PR2 (Development within Neighbourhood Service Areas) will help reduce inappropriate business uses proliferating in residential areas, particularly those which affect the amenity of residents. The policy ensures that development in the Neighbourhood Service Areas is limited to the provision of offices, light industrial uses and start-up units falling within use class B1, protecting employment provision at the local, neighbourhood level.
- 9.71 In terms of health and wellbeing Policy PL9 (Pollution and Contamination) seeks to ensure that any proposal for new development does not give rise to, or would be subject to, unacceptable levels of pollution and/or contamination.
- 9.72 Policy IN1 (Development and Sustainable Modes of Travel) seeks to promote sustainable accessibility, requiring that all development should have regard to the modal hierarchy set out in the Strategic Policies. Development should be of high quality, and sustainable in design, linking

to the existing cycleway, public right of way and bridleway network, offering maximum flexibility in the choice of travel modes, with accessibility for all potential users.

- 9.73 PL7 (Green Infrastructure and Landscaping) requires that development proposals protect and enhance Green Infrastructure and landscaping as part of development. Proposals must demonstrate that they have been designed taking into consideration the practicalities and requirements of future management and maintenance, and providing appropriate footpaths, cycleways and bridleways.

Appraisal of the Draft Plan as a whole

- 9.74 Delivery of the Draft Plan will help to meet the housing, and employment requirements of existing and new communities within the District and the HMA. The urban expansion of Harlow will benefit residents through providing improved infrastructure, facilities, and services across the District, as set out within the IDP (2017). This will contribute towards the development of sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all. Further to this, the regeneration of Harlow will address Harlow's health and wealth inequalities, as well as potentially have a positive effect on the District's neighbourhoods by reducing localised deprivation.
- 9.75 Site specific and District-wide policies are proposed that provide a variety of measures to ensure that the negative impacts of growth on the communities are minimised, and potential opportunities are realised. The Draft Plan seeks to ensure that there is sufficient access to the District's Green Infrastructure network, with particular focus on retaining the network of Green Wedges which have shaped Harlow's growth. Additionally, policies are co-ordinated to ensure the maximum increase in sustainable transport use, to ensure ease of movement and accessibility to all. On balance, it is appropriate to conclude that the Plan would have **long term significant positive effects** on communities and wellbeing.

Economy and Employment

Commentary on the spatial strategy

- 9.76 Harlow's economy has changed dramatically from its New Town origins. Large companies are no longer the hallmark of the economy, with 99.5% of Harlow's businesses now classified as small & medium-sized enterprises, employing less than 250 people. The vast majority of Harlow's businesses (86.9%) employ less than 10 people. Manufacturing has declined but still remains a very important element of the economy supporting 3,500 jobs.⁵¹
- 9.77 Harlow has a 51 hectare Enterprise Zone (EZ), which is one of the 48 designated sites across the UK selected by Government to provide a platform for economic growth and deliver benefits for business.⁵² At the heart of the London Stansted Cambridge corridor, Harlow, as a business location, is growing in significance as a location for world class knowledge-based businesses and organisations including Life Sciences (Public Health England), ICT & Digital (Arrow Electronics) and Advanced Manufacturing (Raytheon). Harlow has also experienced very strong growth in its business population and this is reflective of economic growth sectors in the wider London Stansted Cambridge Corridor (LSCC).⁵³
- 9.78 The spatial strategy seeks to deliver 9,200 dwellings and 20ha of employment land, which will create a significant amount of new jobs in the District.⁵⁴ This is line with the findings of the West Essex and East Hertfordshire Assessment of Employment Needs 2017 prepared in coordination with neighbouring authorities within the sub-regional Functional Economic Area (FEMA). The employment sites identified in the spatial strategy will contribute to meeting the forecast increase in the total number of jobs in the FEMA over the Plan period; responding to the particular growth in Life Sciences and MedTech, advanced manufacturing, ICT and digital industries. This will have a significant long-term positive effect for the economy in Harlow and the wider FEMA as it will meet the needs of these particular sectors and occupiers.
- 9.79 Harlow and Gilston Garden Town Community lies in the core area of the 'London Stanstead Cambridge Corridor' (LSCC), one of the most important and fastest growing economic growth areas in the country. To reflect the commercial role of the Harlow and Gilston Garden Town, up to 18.8ha of B1 uses will be delivered at Harlow Business Park at The Pinnacles and at the Harlow Enterprise Zone at London Road. The aim is for Harlow to prosper as a sub-regional centre, competing with towns such as Bishop's Stortford, the Brookfield Centre, Hertford, Stevenage and the City of Chelmsford, by having an improved retail offer, new commercial leisure provision, an enhanced physical environment and more business space.
- 9.80 Significant employment opportunities already exist at Harlow through the relocation of Public Health England and the Harlow Enterprise Zone. The Economic Development and Prosperity Strategy identified within the Draft Plan supports the growth and retention of existing businesses and inward investment into the District by protecting strategic and locally important sites for employment uses. This includes promoting small scale employment uses within the Garden Town Communities to encourage the sustainable growth of Harlow and reduction in out-commuting. This will enable good opportunity to travel to work by walking, cycling and public transport.
- 9.81 It is anticipated that an enlarged population will support and attract a greater range of services and facilities as well as provide an expanded labour pool. However, to maximise these benefits it is essential that existing issues of congestion are relieved. Transport links to, and facilities at, employment areas may need to be improved in order to capitalise upon new development and an increased local employee catchment. As such, in order to help promote Harlow as a growth location along the M11 corridor, improvements will be made to the local highway and public transport network, improving connections with Stanstead Airport and London. 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.

⁵¹ Harlow Council (2017) Harlow Economic Development Strategy

⁵² Harlow Council (2017) Harlow Corporate Plan

⁵³ Ibid.

⁵⁴ Hardisty Jones Associates (2017) West Essex and East Hertfordshire Assessment of Employment Needs.

9.82 The spatial strategy acknowledges the contribution that Harlow Town Centre will make towards job provision in the District (this being set out in the Town Centre AAP), attracting investors to locate in Harlow and, therefore, develop and regenerate the centres and reduce vacancy rates. The AAP also looks to develop the area's visitor economy, supporting the provision of and improvement to existing leisure and recreational attractions. In this context, the delivery of corresponding facilities such as hotel accommodation, and the improved links to Stanstead Airport and London proposed, will likely have a positive effect on tourism in the District.

Commentary on other policies

- 9.83 All four of the Economic Development and Prosperity Strategy Policies (ED1-ED4) seek to deal with relevant matters. Notably, Policy ED2 (Protecting Existing Floorspace) seeks to retain and enhance the District's existing employment sites for a mixed office, industrial and warehouse uses and other associated activities. These sites make an important contribution to employment provision, drawing in a variety of local and national businesses and diversifying the local economy.
- 9.84 Policy ED3 (Developing a Skills Strategy) seeks to deliver improvements to schools and higher education facilities; providing adult learning opportunities; enhancing partnerships; and supporting local skills and employment providers. This will help to support opportunities for skills and training within the District, improving the lives of residents by increasing living standards through higher wages.
- 9.85 Policy RS1 (Retail Hierarchy) requires that retail development must be directed to Harlow Town Centre first, followed by the centres set out in the retail hierarchy. This reflects the role and function of the District's retail centres and ensures the future vitality of Harlow and the Harlow and Gilston Garden Town. Further to this, Policy RS2 (Future Retail Floorspace) identifies the needs for the District based on housing growth coming forward in the Garden Town Communities, ensuring future retail requirements are met.
- 9.86 A range of other policies are of relevance to the achievement of economic objectives, including the policies dealing with 'Transport' and 'Infrastructure'. Policies IN1 (Development and Sustainable Modes of Travel) and IN2 (Impact of Development on the Highways Network including Access and Servicing) seek to improve levels of congestion, connectivity and accessibility around the District through improvements to sustainable transport, including cycleways, footways and bridleways in development. Policy IN4 (Broadband and Development) requires major development to contribute towards the provision of infrastructure suitable to enable the delivery of high-speed broadband services across the Harlow area. This will contribute positively towards sustainable economic growth and attracting businesses to the District.
- 9.87 SIR1 (Infrastructure Requirements) seeks to deliver the timely provision of infrastructure necessary to support development in Harlow and Harlow and Gilston Garden Town. This includes but is not limited to transport, education, healthcare, and community facilities; having an indirect positive effect on businesses that may be reliant on this provision.
- 9.88 SIR2 (Enhancing Key Gateway Locations) identifies important entrance points for commuters and visitors to Harlow and linkages that connect the Harlow and Gilston Garden communities with the Harlow urban area. The policy seeks to integrate these locations within the wider transport network and green infrastructure network of Harlow, enhancing key destinations as attractors for businesses.

Appraisal of the Draft Plan as a whole

9.89 The Draft Plan allocates land to support housing and employment growth at Harlow, and within the Harlow environs, to help ensure that sub-regional economic growth objectives are realised. Additional housebuilding and related infrastructure development will boost employment opportunities across a range of sectors that will support the local employment base, and create new jobs in new and growing sectors.

- 9.90 The Economic Development and Prosperity Strategy is reflected through the Draft Plan, proposing new development in strategic employment areas to revitalise the District, utilising its location along the M11 transport corridor. The Draft Plan has identified sufficient land to meet identified employment needs through the delivery of the Enterprise Zone and through undeveloped sites at Templefields and the Pinnacles. These sites are expected to satisfy the demand for growth sectors in the Harlow and Gilston Garden Town, assisting in the integration of new employment.
- 9.91 Policies within the Draft Plan ensure the retail hierarchy is followed, and that existing employment space is protected. The Plan also places focus on developing a visitor economy for Harlow supporting the provision of and improvement to existing leisure and recreational attractions; including the River Stort, Harlow Town Park and Harlow Museum. The development of the visitor economy in the town centre and the provision of hotel accommodation, building links to Stanstead Airport and London, will boost tourism in the District, having a positive effect on economic growth. On balance, it is appropriate to conclude that the Draft Plan would have **long term significant positive effects** on economy and employment.

Historic Environment

Commentary on the spatial strategy

- 9.92 Harlow contains a wealth of heritage assets and has a rich historic environment, including ten Conservation Areas (of note is 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), listed buildings, Scheduled Monuments and areas of archaeological value. The heritage value of the District contributes towards the visitor economy, which is highlighted throughout the Plan, building upon the District's arts and cultural attraction and its 'Sculpture Town' status.
- 9.93 The spatial strategy seeks to protect the District's historic assets through sensitive design and layout, maintaining the setting of the distinct areas of Churchgate Street, Old Harlow and Newhall. The majority of growth proposed through the spatial strategy is either completed and/or committed development. The East of Harlow site will deliver around 2,600 dwellings between the existing settlement and the M11. It will result in the loss of greenfield land in close proximity to the Churchgate Street Conservation Area and is likely to change the character of the area and therefore affect the setting of the Conservation Area as well as a number of listed buildings. Draft Plan policies will help to reduce the significance of the negative effect and these are discussed in more detail below.
- 9.94 The majority of the remaining housing requirement is being met through the regeneration of previously developed land. This has the potential for a positive effect on the historic environment through the regeneration of areas/ buildings that are currently detracting from the townscape and historic environment; however, this is uncertain at this stage. A small amount of development is proposed on open space sites within the town. All of these are small scale and unlikely to result in a significant negative effect on the historic environment.
- 9.95 Development proposed in the East of the District through the Harlow Draft Plan and in the surrounding area through the Epping Forest and East Herts Draft Plans to deliver the Garden Town Communities have the potential for a cumulative negative effect on the historic environment. The loss of greenfield and agricultural land will have impacts on the character of the wider historic environment and affect the setting of a number of designated heritage assets.
- 9.96 Historic England highlight within the Harlow Strategic Site Assessment (2016) the importance of retaining the character to the north, west and south of Harlow, stating that Latton Priory and its setting within open countryside is "undoubtedly important". Further to this, the Strategic Spatial Options Study (2016) identified that the proposed strategy for the HMA has the potential for cumulative effects on the nationally designated features present around the Harlow fringe. This includes the scheduled monuments and listed buildings located to the south of the town.
- 9.97 Policy HGT1 (The Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) highlights that development will be sensitive to heritage assets and their settings; requiring that the development and phased delivery of the Garden Town Communities must secure high quality design, and create distinct environments which relate to the surrounding area and the natural and historic landscape and systems.
- 9.98 Ultimately the nature and significance of effects are uncertain at this stage as they will be dependent on the precise design and layout of development as well as mitigation measures delivered. There may be opportunities to enhance the historic environment, particularly through the regeneration of brownfield land within the town; however, this is uncertain at this stage. The Plan includes a number of policies that will help to ensure that development avoids as well as reduces the significance of negative effects on the historic environment and these are considered in more detail below.

Commentary on other policies

- 9.99 Policy WE4 (Heritage) seeks to conserve heritage assets, particularly those that are recognised as having an intrinsic link to the District's New Town Heritage. This policy is likely to have a long-term positive effect on this topic, encouraging development proposals to seek opportunities, where possible, to enhance the historic environment.
- 9.100 PL11 (Heritage Assets and their Settings) further seeks to protect the significance of heritage assets, requiring that where development affects a heritage asset or its setting, an appropriate management plan must be in place to conserve and enhance the asset and its setting. The Council will consult with Historic England and possibly other bodies such as Essex County Council where development would affect heritage assets and/or their setting.
- 9.101 Policy PL1 (Design Principles for Development) requires development to deliver high quality design through development that protects and enhances the District's historic environment.
- 9.102 Policy ED4 (Developing a Visitor Economy) seeks to maintain and enhance the local townscape and heritage setting; supporting development proposals where they are of a scale, type and appearance appropriate to the locality. The policy seeks to the District's arts and cultural visitor economy, utilising the New Town heritage and natural features.
- 9.103 Policy PL12 (Advertisements) assesses proposals for advertisements against 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. This seeks to avoid clutter and/or an unattractive street scene that would adversely effect on the historic environment.
- 9.104 There are also a number of policies that seek to protect and enhance the landscape character of the District, which is important in terms of protecting setting of designated heritage assets within the District. These include Policies PL7 (Green Infrastructure and Landscaping), WE1 (Strategic Green Infrastructure) and PL4 (Green Wedges and Green Fingers).

Appraisal of the Draft Plan as a whole

- 9.105 The majority of growth proposed through the Draft Plan is either completed and/ or committed development. The East of Harlow allocation is the largest proposed development and will deliver around 2,600 new dwellings and associated infrastructure in close proximity to a number of designated heritage assets. The loss of greenfield and agricultural land will change the character of the area and is likely to have a negative effect on the historic environment.
- 9.106 The majority of the remaining housing requirement is being met through the regeneration of previously developed land within the town. This has the potential for a positive effect on the historic environment through the regeneration of areas/ buildings that are currently detracting from the townscape and historic environment; however, this is uncertain at this stage. A small amount of development is proposed on open space sites within and on the edge of the town. The majority of these are small scale and unlikely to result in a significant negative effect on the historic environment.
- 9.107 Development proposed in the East of the District through the Harlow Draft Plan and in the surrounding area through the Epping Forest and East Herts Draft Plans to deliver the Garden Town Communities have the potential for a cumulative negative effect on the historic environment. The loss of greenfield and agricultural land will have impacts on the character of the wider historic environment and affect the setting of a number of designated heritage assets. Historic England highlighted the importance in trying to retain the character of the areas surrounding Harlow through the HMA level Strategic Spatial Options Study
- 9.108 The Draft Plan seeks to minimise impacts on the historic environment through a number of policies. This includes Policies WE4 (Heritage) and PL11 (Heritage Assets and their Settings) which establish the framework for the protection and proactive conservation of heritage assets.

They seek to conserve and enhance the unique built environment, recognising that there are parts of the historic environment which contribute 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.

- 9.109 Development that affects a heritage asset or its setting will also be assessed based on the effects caused by the development on the significance of the heritage assets, with some proposals requiring the implementation of an appropriate management plan. Development will be supported where it includes high quality design that respects the character and appearance of the local area; and having regard to the relevant Character Appraisals and Management Plans if proposing development within a Conservation Area.
- 9.110 On balance, it is appropriate to conclude **uncertain minor cumulative negative effects** at this stage, given the extent of the local heritage value and the significant level of growth proposed cumulatively through the Garden Town Communities. It is recognised that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

Housing

Commentary on the spatial strategy

- 9.111 With respect to housing need, the spatial strategy allocates sites to support housing growth in accordance with the identified requirement of up 9,200 new homes over the plan period. This figure has been established in coordination with neighbouring authorities within the West Essex and Hertfordshire HMA, the current version of the SHMA (2017), and the Essex wide GTAA. The housing requirement is above the OAHN of 7,409 dwellings identified for Harlow through the most recent SHMA update (July 2017). The additional growth will help to meet significant affordable housing needs⁵⁵, aspirations for regeneration in Harlow⁵⁶ and provide an additional buffer should any allocated sites not come forward within the Draft Plan period.
- 9.112 Given the overall housing need and the limited land availability within Harlow, the spatial strategy allocates 2,600 new homes at the Strategic Housing Site East of Harlow. This is to have a significant positive effect in relation to the housing topic through diversifying the existing housing market and supporting economic aims. Further to this, locating housing in the east should address areas of housing deprivation and barrier to services. All Strategic Sites surrounding Harlow and forming the Garden Town Communities will provide a wide range of types and tenures of homes, informed by site-specific evidence, ensuring there is a balanced mix of sustainable and high quality homes across the West Essex and Hertfordshire HMA.
- 9.113 A key challenge for the District is the shortage of affordable housing and a range of good quality housing stock. Harlow has the highest percentage requirement of affordable housing need in the HMA, with 61% in Harlow compared with 35% in Epping Forest, 32% in East Hertfordshire and 26% in Uttlesford. The need in Harlow equates to around 3,400 new affordable dwellings over the Draft Plan period.⁵⁷ The spatial strategy seeks to address this need, maximising the use of previously developed land for new homes, including bringing forward Priority Estate Regeneration projects. These provide an opportunity to redevelop some of the more outdated estates, producing a net increase in the number of homes in the area, further increasing the supply of affordable homes.
- 9.114 In terms of Gypsies and Travellers, a future need of 9 pitches in the District has been identified for the remainder of the Draft Plan period. The spatial strategy seeks to provide 12 additional pitches through the refurbishment of Fern Hill Lane site; going over and above the identified need and providing additional pitches to meet provision beyond the Plan period. Where further evidence demonstrates that additional provision is required, Policy H10 (Travellers Pitches and Plots) sets out the criteria against which applications will be assessed to ensure sustainable delivery.

Commentary on other policies

- 9.115 Policy H7 (Housing Mix and Accommodation Types) seeks to ensure that an appropriate mix of housing and accommodation types is provided to meet the needs of all residents. This includes support for proposals for housing specifically designed to meet the identified needs of older people, specialist accommodation and self-build/custom build housing. This is supported through the remainder of the Housing Policies (H1-10). For example, Policy H10 (Travellers' Pitches and Plots) seeks to meet the needs of Gypsies, Travellers and Travelling Showpeople, restoring 12 pitches at the Fern Hill Lane site.
- 9.116 As discussed, above, Harlow has a significant percentage affordable housing need in comparison to the other Districts in the HMA. Policy H8 (Affordable Housing) sets out the affordable housing requirement for new developments coming forward during the plan period, a need of 3,400 homes. The delivery of this will have a long-term positive effect on housing as it will help to meet the affordable housing need within Harlow.

⁵⁵ Opinion Research Services (July 2017) West Essex and East Hertfordshire Strategic Housing Market Assessment: Affordable Housing Update.

⁵⁶ Harlow Council (2013) Harlow Future Prospects Study: Linking Regeneration & Growth.

⁵⁷ Opinion Research Services (Sept 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings.

- 9.117 Policy HS1 (Housing Delivery) sets out the spatial development strategy. Policy HS3 (Strategic Housing Site East of Harlow) seeks to deliver 2,600 dwellings and associated infrastructure on land to the east of Harlow. This has the potential to deliver a broad range of housing types and tenures, with accompanying infrastructure provision, having a positive effect on supporting services and facilities. Policy HS2 (Housing Allocations) proposes a number of housing allocations to help meet the housing requirement.
- 9.118 The Draft Plan also seeks to deliver good quality housing that makes a positive contribution towards communities and improve the quality of the built environment through Policy PL1 (Design Principles for Development). This policy seeks to ensure that the layout and size of new dwellings are suitable to serve the amenity requirements of future occupiers.

Appraisal of the Draft Plan as a whole

- 9.119 The Draft Plan takes a positive approach to providing for the housing needs of the District, allocating sites to meet the District's housing requirement over the plan period. This has been established in coordination with neighbouring authorities within the HMA and is set out within the MoU, agreed in March 2017. The Draft Plan will deliver additional housing growth over identified needs to help meet the significant affordable housing needs, meet aspirations for regeneration and provide a buffer in case any sites don't come forward during the life of the Plan.
- 9.120 A strong focus on development in and around Harlow reflects the fact that the town represents the most sustainable location within the HMA. Harlow's role as sub-regional centre for employment is prioritised, as well as its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections; its important location on the London - Stanstead - Cambridge corridor; and above all, the wider growth aspirations for the town.
- 9.121 Draft Plan policies seek to ensure that housing is delivered at the right scale, of the right type and in the right location to meet community needs. The range of specific and specialist housing needs to be met includes affordable housing as well as the needs of Gypsies, Travellers and Travelling Showpeople communities. With regard to affordable housing, viability work leads to the conclusion that policy can require at least 30% affordable housing on major developments, meeting an affordable housing need of 154 dwellings per annum. With regards to Gypsy and Travellers, the proposal is to take a precautionary approach, in that accommodation will be provided over and above that necessary to meet the needs of Travellers.
- 9.122 In conclusion, **long term significant positive effects** are predicted.

Land and Waste

Commentary on the spatial strategy

- 9.123 Key issues locally include the efficient use of land, whether there are potential contamination issues, the agricultural quality of land, and how waste issues will be managed; however, the spatial strategy, as understood at the current time, has limited implications.
- 9.124 The spatial strategy seeks to maximise the use of previously developed land for new homes and minimise impact on the environment, having long-term positive effects in relation to the efficient use of land. This includes the redevelopment of the Princess Alexandra Hospital, and the Priority Estate Regeneration projects. This will provide an opportunity to redevelop some of the more outdated estates, maximising the allocation at these locations.
- 9.125 Best and most versatile agricultural land is present in the East of the District (Grade 2), and as such development of the Strategic Site to the East of Harlow would lead to the loss of this resource. None of the other allocations within the District are likely to result in the significant loss of any agricultural land. Cumulatively, the development of the East of Harlow site as well as the Garden Town Communities proposed through the Epping Forest and East Herts Draft Plan will result in a significant loss of agricultural land.
- 9.126 10% of the District is currently within the Metropolitan Green Belt, which under the spatial strategy is to be protected from inappropriate development, and where possible, enhanced. The spatial strategy seeks to link the District's Green Belt to the existing Green Wedges and Green Fingers, preventing neighbourhood coalescence, and shaping the unique character of Harlow. This contributes positively to the Garden Town principle of *'combining the best of town and country to create healthy communities, including opportunities to grow food'*.
- 9.127 New development will support the implementation of good waste management in line with the Essex and Southend-on-Sea Waste Draft Plan (2017), which forms part of the Development Plan for Harlow. Under Policy SIR3 (Waste and Minerals) proposals will be required to implement the principles of the Waste Hierarchy and contribute towards the achievement of a 50% recycling target by 2020⁵⁸. The Waste Draft Plan seeks to direct new waste development towards Harlow, ensuring that the District is adequately served in light of the forecasted increase in waste management needs throughout the Draft Plan period.

Commentary on other policies

- 9.128 Although references are made throughout the Plan to encourage the use of previously developed land (including within the spatial development strategy), there is no specific policy which relates to the use of previously developed land; this is however adequately addressed by the NPPF.
- 9.129 Policy WE1 (Strategic Green Infrastructure) and Policy WE2 (Green Wedges and Green Fingers) require that new Green Infrastructure be planned into development, and where possible connected to existing Green Infrastructure (including the Green Belt, Green Wedges and Green Fingers). This will maintain the District's natural features, recognising that they are fundamental to the character of Harlow.
- 9.130 Policy PL9 (Pollution and Contamination) permits development provided that it does not give rise to, or would be subject to, unacceptable levels of pollution and contamination. Where it can be demonstrated that pollution and/or contamination is unavoidable, appropriate measures must mitigate the negative effects of the development.
- 9.131 Policy SIR3 (Waste and Minerals) as discussed, above, ensures that principles within the Waste and Minerals Development Plan documents continue to be implemented as part of the District's contribution to minerals and waste planning.

⁵⁸ The EU Waste Framework Directive states that the UK must recycle 50% of household waste by 2020

Appraisal of the Draft Plan as a whole

- 9.132 Development proposed through the Draft Plan has the potential for impacts on the quality and quantity of natural resources. The Plan will involve the loss of greenfield and agricultural land, directing a large proportion of growth to the East of Harlow Site where high value agricultural land is present. Opportunities to redevelop previously developed land through the regeneration of Harlow are set to be maximised; however, it is recognised available brownfield land within the District is limited.
- 9.133 There is the potential for a significant cumulative loss of greenfield and agricultural land surrounding Harlow as a result of development proposed through the emerging Harlow, Epping Forest and East Herts Draft Plans. However, it is important to note that there has been extensive work carried out at the HMA level through the Strategic Spatial Options Study to explore alternatives for development surrounding Harlow and ensure that the most appropriate sites are brought forward to meet identified needs.
- 9.134 On balance, it is appropriate to conclude **long term minor negative effects**. However, this conclusion is uncertain, given that there would be greenfield loss under a 'no plan' (or 'future baseline') scenario and that all the alternatives would result in a similar conclusion. It is not clear that more could be done through the spatial strategy to minimise greenfield land take.

Landscape

Commentary on the spatial strategy

- 9.135 The sensitivity of the different Landscape Character Areas to change within the District was considered through The Harlow Area Landscape and Environment Study (2005). Based on this evidence the preferred strategy will result in development in landscape areas of low sensitivity to small, substantial, and very-large urban development. However, it recognised that the landscape sensitivity of these areas may have changed since the publication of this study.
- 9.136 There are three areas designated as Special Landscape Areas within the District, which are areas that have a 'special visual quality that distinguishes them from other tracts of countryside'.⁵⁹ These are located in the north-western corner, south-western corner and north-eastern corner and fall within designated Green Belt land. These areas will be protected through the Draft Plan, maintaining their visual quality of importance.
- 9.137 The Strategic Housing Site East of Harlow falls within a relatively contained Landscape Character Area, with limited visibility resulting from the areas topography and the adjacent urban built form. The sense of tranquillity of the area is very limited, and as such development is not expected to adversely impact the landscape character. Nonetheless, it is recognised that the delivery of 2,600 homes on the eastern edge of the District will result in some residual effects on the landscape, and as such mitigation is proposed through the spatial strategy.
- 9.138 The remaining site allocations are all located within the urban boundary of Harlow and the majority of growth will be delivered on previously developed land. The regeneration of brownfield land presents an opportunity to have a positive effect on the built environment and townscape although the significance of this will be dependent on each site and the implementation of development. The dominant green spaces (notably the Green Wedges and Green Fingers) provide a sense of openness and tranquillity within the otherwise densely populated area. These areas are to be retained and enhanced through individual site requirements and the wider spatial strategy.
- 9.139 The spatial strategy 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 form and landscape character and underpin the proposed spatial strategy, aiding the delivery of Garden Town Communities across the Harlow and Gilston Town. In line with Policy HGT1 (The Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town), development of the Garden Town Communities are required to create distinctive environments which relate to the surrounding area and natural and historic landscapes and systems.
- 9.140 In terms of cumulative effects, the development of the Garden Town Communities proposed through the emerging Harlow, Epping Forest and East Herts Draft Plans are likely to alter the character of the landscape surrounding Harlow. This will likely give rise to direct impacts to settlement edge landscapes through the loss of greenfield and agricultural land, which are inherently important on the basis that they are valued for their visual and historic character.

Commentary on other policies

- 9.141 Policy PL1 (Design Principles for Development) sets out the design criteria for Harlow, requiring that development protect, enhance or improves local distinctiveness, taking account of local character, patterns of development, urban form and landscape character, and Green Infrastructure including trees and landscaping.
- 9.142 Policy PL6 (Trees and Hedgerows) supports development which seeks to ensure that trees and hedgerows in Harlow, which form part of an important part of the Green Infrastructure and landscaping, are protected. This is further reiterated through Policy WE3 (Biodiversity and Geodiversity) which seeks to preserve and enhance biodiversity assets including aged or veteran trees outside Ancient Woodland.

⁵⁹ Chris Blandford Associates (2005) Harlow Area Landscape and Environment Study.

- 9.143 Policy PL7 (Green Infrastructure and Landscaping) requires that Green Infrastructure and landscaping must be protected and enhanced as part of development. This is reiterated through Policy WE1 (Strategic Green Infrastructure) which also seeks to protect and enhance the network of accessible, multi-functional green infrastructure as identified on the Policies Map. In this context, Policy PL5 (Other Open Spaces) requires that development does not compromise the landscape character, openness, or urban design principles of the town and/or the surrounding area.
- 9.144 Policy WE2 (Green Wedges and Green Fingers) highlights that Green Wedges and Green Fingers are fundamental to the character of Harlow. The purpose of this policy is to continue to protect the Green Wedges and Green Fingers, requiring that development enhance the wider landscape and setting, and integrate with the District's existing Green Infrastructure. This is reiterated through Policy PL5 (Other Open Spaces), which requires that development does not compromise the landscape character, openness, or urban design principles of the town and/or the surrounding area.
- 9.145 Policy PL12 (Advertisements) assesses proposals for advertisements against 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. This seeks to avoid clutter and/or an unattractive street scene that would adversely effect on the historic environment.
- 9.146 Policy SIR2 (Enhancing Key Gateway Locations) requires the use of appropriate landscaping and boundary treatments to seamlessly integrate identified gateway locations with the wider Green Infrastructure network of Harlow.

Appraisal of the Draft Plan as a whole

- 9.147 The Draft Plan seeks to maximise the use of previously developed land and generally directs growth towards landscape areas of low landscape sensitivity. The regeneration of brownfield land presents an opportunity to have a positive effect on the built environment and townscape although the significance of this will be dependent on each site and the implementation of development.
- 9.148 The East of Harlow allocation proposes the delivery of around 2,600 new dwellings and associated infrastructure on greenfield land. The site falls within a relatively contained Landscape Character Area, with limited visibility resulting from the areas topography and the adjacent urban built form. The sense of tranquillity of the area is very limited, and as such while development is not expected to have significant negative effect on the landscape there will be changes to the character of the area.
- 9.149 In terms of cumulative effects, the development of the Garden Town Communities proposed through the emerging Harlow, Epping Forest and East Herts Draft Plans are likely to alter the character of the landscape surrounding Harlow. This will likely give rise to direct impacts to settlement edge landscapes through the loss of greenfield and agricultural land, which are inherently important on the basis that they are valued for their visual and historic character.
- 9.150 The policies contained within the Draft Plan aim to conserve, protect and enhance the natural and built environment of Harlow, including its Green Infrastructure network and overall landscape quality. Under Policy HGT1 (Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town) proposals are to deliver distinctive environments which relate to the surrounding area and the natural and historic landscape and systems, green infrastructure and biodiversity.
- 9.151 Development design is required to take into account of the adopted Harlow Design Guide SPD, ensuring that design and layout of new development respects Sir Frederick Gibberd's master plan for the New Town, ensuring the town is contained within the original landscape and retains as many natural features as possible. In this context, the Draft Plan policies provide a strong framework to ensure that the urban form and building design is shaped by, and responds to, the character of the surrounding countryside.

9.152 The precise layout and design of development surrounding Harlow, sensitivity of the landscape in those areas and mitigation available will ultimately determine the significance of effects. At this stage, **uncertain minor cumulative negative effects** are predicted as a result of the development of the Garden Town Communities proposed through the emerging Harlow, Epping Forest and East Herts Draft Plans. Careful master planning done in partnership with surrounding authorities and key stakeholders will help to reduce the significance of any residual effects.

Transport

Commentary on the spatial strategy

- 9.153 Harlow is the largest settlement in the sub-region, with good access to services/facilities, and employment, given its Enterprise Zone status. Development proposed through the spatial strategy therefore has the potential for positive effects on this topic by promoting accessibility, helping to reduce the need to travel and reduce reliance on the private vehicle.
- 9.154 Proposed development within and surrounding Harlow will utilise the District's transport connections with London, Cambridge, the major international airport of Stanstead (located 24km to the north east), and links to the M25. The extension of Crossrail 2 to Harlow will also reinforce the key locational advantages of the District and serve the growth identified across the wider Harlow area.
- 9.155 The road network around Harlow carries large volumes of traffic; the most notable area of congestion being on the routes and links to Junction 7 of the M11, but also the A414. Transport Modelling carried out as part of the Strategic Spatial Options Study for the West Essex and East Hertfordshire Housing Market Area indicated that a 35-40% increase in trips on the network by 2033 is to be expected, based on 14,000 new homes in and around Harlow (and 48,000 across the wider HMA).⁶⁰
- 9.156 In terms of the level of development that can be accommodated in and around Harlow, the transport modelling indicated that the preferred spatial strategy for the HMA can be delivered; provided that key mitigation measures are delivered during the Plan period. The Council has been working with neighbouring planning authorities, Essex and Hertfordshire County Councils and Highways England to delivery the necessary infrastructure to support the delivery of the proposed garden Town Communities around Harlow. The signed MoU (2017) has been produced, which identifies a number of strategic new infrastructure interventions that will be necessary. This includes new motorway junctions identified within the transport modelling. The New M11 Junction 7a will improve the flow of traffic east to west across the District and provide a catalyst for further development, promoting Harlow as a growth location along the M11 corridor. The Council will also 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.
- 9.157 With respect to Harlow town, it was concluded through the transport modelling that an early delivery of a second crossing over the River Stort was essential to enable the development of an effective north-south sustainable travel corridor, significant modal shift towards public transport, walking and cycling, and wider network benefits to Harlow.
- 9.158 The spatial strategy will be underpinned by the necessary supporting transport infrastructure identified, above, with development phased over the Draft Plan period to ensure that correct levels of infrastructure are provided. In line with Policy HGT1 (The Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town), development seeks to create a step change in modal shift by contributing to the delivery of Sustainable Transport Corridors, providing linkages to and from Harlow and the new Garden Town Communities. The Transport Corridors will provide high speed bus routes with limited stops, positively improving connections within Harlow and to areas outside of the District, the Enterprise Zones and other employment areas. It is noted that the sites likely to benefit most are those located close to the proposed bus stops (Latton Priory, Harlow Town Centre, the train station, and Gilston), as a result of improved access to sustainable transport.
- 9.159 On-site and off-site infrastructure proposed through the Draft Plan will establish an integrated, accessible and safe transport system that meets the needs of existing and future cross-boundary residents and visitors.

⁶⁰ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

Commentary on other policies

- 9.160 Policy IN1 (Development and Sustainable Modes of Travel) seeks to minimise the need to travel, promote opportunities for sustainable transport modes, and improve accessibility to local facilities and linkages with the surrounding pedestrian and cycle network. This will help to reduce reliance on the private vehicle and encourage the use of more sustainable modes of travel with the potential for a long-term positive effect by helping to reduce greenhouse gas emissions.
- 9.161 Further sustainability initiatives promoted through Policy IN1 include requiring that development provide electric vehicle charging points (EVCPs) in accordance with the latest government guidance.
- 9.162 Policy IN2 (Impact of Development on the Highways Network including Access and Servicing) further seeks to support the transition to a low carbon future through improving road congestion and facilitating sustainable movement. In this context, the policy recognises that in accordance with national policies and guidance, it may be necessary for an application to be accompanied by either a Transport Statement or Transport Assessment; depending on the degree of the proposal's impact on highway users and movement in the local area generally. The Council will consult with the Local Highway Authority and other bodies on the Transport Assessment or Statement.
- 9.163 Policy IN3 (Parking Standards) requires that vehicle parking must be provided in accordance with the adopted Essex Vehicle Parking Standards⁶¹, unless otherwise indicated elsewhere in the Draft Plan and/or supporting documents. The Parking Standards provide a rigorous approach to parking, accessibility and promoting travel choice. The policy therefore seeks to reduce reliance on the car and promote more sustainable modes of travel while ensuring that on-street parking issues are not created
- 9.164 Policy SIR1 (Infrastructure Requirements) seeks to ensure that new development is served and supported by appropriate infrastructure and services identified through the Infrastructure Delivery Plan, which includes transport infrastructure. It is also noted that individual development proposals will be required to secure related infrastructure both on and off site necessary to make the development acceptable.
- 9.165 Policy SIR2 (Enhancing Key Gateway Locations) seeks to seamlessly integrate the gateway locations identified with the wider transport network of Harlow; improving pedestrian cycle routes which are legible, secure and safe, and that connect with the existing network
- 9.166 Policy PL1 (Design Principles for Development) seeks to ensure that new development 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 travel.
- 9.167 Policy PR5 (The Sequential Test and Principles for Main Town Centre Uses) supports development where it is related to public transport facilities, or is located where appropriate provision for sustainable transport can be provided. Outside of the centres, Policy PR3 (Employment Development Outside Employment Areas and Neighbourhood Services Areas) takes a similar approach to development, supporting proposals only when consideration has been taken for the impact of development on road congestion.

Appraisal of the Draft Plan as a whole

- 9.168 The Draft Plan will deliver housing, employment and associated improvements to services/facilities and public transport, to meet the needs of new and existing communities, reducing the need to travel, and alleviating levels of congestion on the local transport network.
- 9.169 The delivery of the Harlow and Gilston Garden Town as well as other Garden Town Communities will be accompanied by new essential infrastructure across a range of sustainable modes, including the delivery of the Sustainable Transport Corridors to connect the major sites

⁶¹ Essex County Council (2009) Parking Standards: Design and Good Practice <https://www.castlepoint.gov.uk/essex-vehicle-parking-standards>

in the Garden Town. Policy HGT1 (The Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) promotes well located and co-ordinated development, which will facilitate the development of sustainable movement corridors, utilising growth to support public transport, walking and cycling corridors.

- 9.170 There are aspirations throughout the Draft Plan for a modal shift in travel, where 60% of travel would be by sustainable modes of transport and 40% would be by car. Sustainable transport matters (including walking, cycling and public transport) are, therefore, a key focus for Plan policies to support the successful future growth of Harlow.
- 9.171 While the Plan seeks to support modal shift away from car dependency; there are, however existing traffic problems that could be exacerbated. The transport modelling work undertaken indicates that the proposed level of development in the Draft Plan would increase traffic levels across the network.
- 9.172 A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A) and the provision of new Sustainable Transport Corridors through Harlow. On-site and off-site infrastructure proposed will help manage overall travel demand; establishing an integrated, accessible and safe transport system that meets the needs of existing and future cross-boundary residents and visitors.
- 9.173 On balance, it is appropriate to conclude **uncertain positive effects**, recognising that there is some uncertainty at this stage.

Water

Commentary on the spatial strategy

- 9.174 Harlow is located within an area of serious water stress, which will be exacerbated due to climate change and future growth and development. Consideration has been given to ensuring water demand and waste water infrastructure capacity can be managed throughout the Plan period; however, there is little evidence to indicate that this is a significant issue for the spatial strategy.
- 9.175 Harlow falls into the Upper Lee catchment area and portable drinking water in the District is provided by Affinity Water. Across Affinity Water's Central Region area, which Harlow is located in, the Water Resources Management Plan (2014) sets out water related infrastructure projects which will ensure that predicted demands can be met.
- 9.176 Thames Water is responsible for waste water in Harlow and the surrounding area, ensuring infrastructure is in place to accommodate anticipated growth. In this context, the Rye Meads Sewage Treatment Works (STW) is currently being upgraded to increase capacity. The upgrade will provide Rye Meads STW with a treatment capacity of 447,134 Population Equivalent.
- 9.177 Thames Water position statement (2017) indicates that capacity in the Treatment Works is expected up to 2036; however, upgrades may be required in sludge and storm streams. Further network modelling and growth review is being undertaken by Thames Water to understand sewer capacity in the area before outlining further intervention solutions. This modelling work will inform a Water Cycle Study being prepared by the Council.⁶²
- 9.178 The Council will work with the relevant utility providers, as discussed above, to ensure that new homes have connections to clean water, wastewater, and other utilities. A requirement for the Harlow and Gilston Garden Town Communities under policy HGT1 (Development and the Delivery of Garden Town Communities in the Harlow and Gilston Garden Town) is the provision of water supply and waste water network infrastructure for occupants.
- 9.179 Harlow Council commissioned a Water Cycle Study Phase 1 Update and the Draft Report did not identify any issues which require further assessment by a Phase 2 study.⁶³

Commentary on other policies

- 9.180 Policy PL10 (Water Quality, Water Management, Flooding and Sustainable Drainage Systems) supports development only where it does not adversely affect water quality, including quality of waterways and other bodies of water, identified Source Protection Zones (SPZ), Aquifers and all other groundwater. In terms of water management, the policy requires that all new dwellings achieve the Optimal Technical Housing Standard for water efficiency of no more than 110 litres per person per day as described by Building Regulations.
- 9.181 Policy PL9 (Pollution and Contamination) permits development provided that it does not give rise to unacceptable impacts on surface and groundwater quality. Where it can be demonstrated that adverse effects cannot be avoided, appropriate measures must mitigate the negative effects of development.

Appraisal of the Draft Plan as a whole

- 9.182 The Council will work with the relevant utility providers to ensure that new homes have connections to clean water, wastewater, and other utilities. Harlow Council commissioned a Water Cycle Study Phase 1 Update and the Draft Report did not identify any issues which require further assessment by a Phase 2 study.⁶⁴

⁶² Thames Water (2017) Greater Harlow Position Statement.

⁶³ Harlow Council (April 2018) Water Cycle Study Update Draft Report. Prepared by JBA Consulting.

⁶⁴ Harlow Council (April 2018) Water Cycle Study Update Draft Report. Prepared by JBA Consulting.

9.183 The development management policies within the Plan seek to ensure that water quality and water management is fully considered as part of new development proposals, and it is expected that most sites should prove possible to ensure adequate water supply and infrastructure. Taking the evidence into account a **neutral effect** is concluded at this stage.

Part 3: What happens next?

10. Introduction (to Part 3)

10.1 The aim of this chapter is to explain next steps in the plan-making/SA process.

Plan finalisation

10.2 Subsequent to the consultation on the Draft Pre-Submission stage, the main issues raised will be identified and summarised by the Council, who will then submit the plan (and the summary of representations received) for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

10.3 If found to be 'sound' the plan will be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

10.4 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The Draft Pre-Submission Local Plan includes a range of proposed monitoring measures. The table below lists a selection of the Council's proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal.

Table 10.1: A selection of the Council's potential monitoring measures

SA topic	Proposed measure
Air quality	<ul style="list-style-type: none"> Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose a number of monitoring measures. Risk of pollution and contamination.
Biodiversity and green infrastructure	<ul style="list-style-type: none"> Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose a number of monitoring measures. Change in number of biodiversity and geodiversity designated assets in the district.
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> None at this stage.
Community and wellbeing	<ul style="list-style-type: none"> Number of key local facilities in Neighbourhood Centres and Hatches. Delivery of strategic and local infrastructure to support new development. Amount of public open space, allotments, play space and sporting provision and facilities. Change in number and area of Recreational, Sporting, Cultural and Community Facilities.
Economy and employment	<ul style="list-style-type: none"> Net additional employment floorspace up to 2033. Net loss of employment floorspace in Strategic Employment Areas and Neighbourhood Service Areas. Change in number of visitors. Change in employment floorspace outside Strategic Employment Areas and Neighbourhood Service Areas. Number of jobs created by the major developments. Net additional retail floorspace in existing Retail Centre.
Historic environment	<ul style="list-style-type: none"> Change in number and area of heritage assets in the district.
Housing	<ul style="list-style-type: none"> Net additional dwellings built.

SA topic	Proposed measure
	<ul style="list-style-type: none"> • Net additional dwellings built in Strategic Housing Site East of Harlow. • Number of new Gypsy and Traveller pitches completed. • Percentage of new dwellings meet the Building Control Part M4(2) Standard for accessible and adaptable homes. • Number of dwellings for wheelchair users under the Building Control Part M4(3) standard in major residential development. • Type and size of housing in major residential developments. • Percentage of Affordable Housing built in new major residential developments • Net additional land allocated for self-build.
Land and waste	<ul style="list-style-type: none"> • Percentage of recycling household waste. • Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.
Landscape	<ul style="list-style-type: none"> • Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.
Transport	<ul style="list-style-type: none"> • Delivery of strategic and local infrastructure to support new development.
Water	<ul style="list-style-type: none"> • Percentage of new dwellings achieving the Optional Technical Housing Standard for water efficiency (no more than 110 litres per person per day).

Appendices

Appendix I: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation.

Table A: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

Questions answered		As per the regulations...the SA Report must include...	
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes 	
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the Plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Submission Plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Submission Plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table B: Questions answered by the SA Report, in accordance with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
3. the environmental characteristics of areas likely to be significantly affected;		
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
9. a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Whilst Tables A and B signpost *broadly* how/where this report presents the information required of the SA Report by the Regulations, as a supplement it is also helpful to present a discussion of *more precisely* how/where regulatory requirements are met - see **Table C**.

Table C: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What's the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2010.
3. The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA Framework', and this is presented within Chapter 3 ('What's the scope of the SA').
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	More detailed scoping information - i.e. messages established through context and baseline review - is presented within Appendix II.
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report (2010) presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. An updated context review is provided in Appendix II of this SA Report.</p> <p>The context review informed the development of the SA framework and topics, presented in Chapter 3.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>":</p> <ul style="list-style-type: none"> • Chapter 5 explains how reasonable alternatives were established in 2017/18. • Chapter 6 set out the summary findings of the appraisal of the reasonable alternatives, with the detailed appraisal provided in Appendix IV. • Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 9 sets out the findings of the appraisal of the Draft Pre-Submission Local Plan.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	<ul style="list-style-type: none"> • Chapter 6 sets out the summary findings of the appraisal of the reasonable alternatives for the Draft Plan (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/consultation), with the detailed appraisal provided in Appendix IV. • Chapter 9 presents the Draft Pre-Submission Local Plan appraisal. <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.</p>
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The appraisal of reasonable alternatives presented in Chapters 6 and of the Draft Pre-Submission Local Plan in Chapter 9 identify how the plan might potentially 'go further' in certain respects, and makes a number of specific recommendations.

Regulatory requirement**Discussion of how requirement is met**

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 5, 6 and 7 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/assumptions are also discussed as part of appraisal narratives.
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 10 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided in a separate document.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	Interim SA Reports were published alongside the Issues and Options Document in 2010 and Emerging Strategy and Further Options in 2014. These reports set out the findings of the SA for the preferred approaches and alternatives at that time. At the current time, this SA Report is published alongside the Draft Pre-Submission Local Plan, under Regulation 19, so that representations might be made ahead of submission.
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The SA Report must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has taken into account the Interim SA Reports published in 2010 and 2014, alongside consultation responses received, when finalising the Draft Pre-Submission Local Plan for publication. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).
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Appendix II: Scoping information

Introduction

As discussed in Chapter 3 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline', analysis of key issues, and consultation. The detailed scoping information was presented in a draft scoping report sent to statutory consultees in 2010. Since that time, the SA scope has evolved somewhat as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2010.

The aim of this appendix is to present a summary of the scoping information and ensure that the information required under Schedule 2 of the SEA Regulations is provided.

Relationship with other plans and programmes

The following plans and programmes provide the key policy context for the Harlow Local Plan:

- **National Planning Policy Framework (NPPF):**⁶⁵ sets out the Government's planning policies for England and how these are expected to be applied. The framework acts as guidance for local planning authorities, covering a range of environmental, social and economic themes, including:
 - The commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible;
 - Adopting proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure;
 - Considering the potential cumulative impact of a number of smaller developments on air quality as well as more substantial ones;
 - Using technology to reduce the need to travel;
 - Encouraging land use and transport development which support reductions in greenhouse gas emissions and reduced congestion; and
 - Supporting new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- **National Planning Practice Guidance (NPPG):**⁶⁶ provides relevant, technical planning practice guidance for local authorities, including:
 - Local Plans should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area;
 - Local Plans should support the delivery of appropriately sited green energy and the management of greenhouse gas emissions through energy efficiency measures;
 - Local Planning Authorities should "*adopt proactive strategies to mitigate and adapt to climate change*". Climate change can be mitigated through Local Plans by reducing the need to travel, providing opportunities for renewable and low carbon energy technologies, identifying opportunities for decentralised energy and heating and through the design of new development to reduce energy demand;
 - Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to those of a higher quality; and

⁶⁵ Department for Communities and Local Government (2012) National Planning Policy Framework https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁶⁶ Department for Communities and Local Government (2012) National Planning Practice Guidance. <http://planningguidance.communities.gov.uk/>

- It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.
- **Biodiversity 2020 Strategy⁶⁷**: A strategy for England's wildlife and ecosystem services, 2011: builds on the Natural Environment White Paper and set out the “strategic direction for biodiversity policy for the next decade”. Aims to halt biodiversity loss and improve the ecological networks and ecosystems for all peoples.
- **Climate Change Act 2008⁶⁸**: established a framework to develop an economically credible emissions reduction path. The Act sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.
- **Flood and Water Management Act (2010)⁶⁹**: sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).
- **Essex Biodiversity Action Plan (2011)⁷⁰**: sets targets for the protection of species and habitats in Harlow. The Plan identifies 25 species and 10 habitat types as a focus for action. The following are relevant to Harlow
 - Species: Brown hare, dormouse, otter, pipestrelle bat, water vole, bittern, grey partridge, skylark, song thrush, great crested newt, stag beetle and black poplar.
 - Habitats: Hedgerows, Ancient Woodland, old orchards, reed beds, urban habitats, natural grassland.
- **Essex Local Flood Risk Management Strategy (2013)⁷¹**: sets out what needs to be done to tackle flooding in Essex. The strategy focuses on ‘local flood risk’, assessing levels of risk from different flooding sources.
- **Essex and Suffolk Water, Water Resource Management Plan (2014)⁷²**: sets out how Essex and Suffolk Water will manage the balance between water supply and demand over a 25 year period up to 2040. Non-household demand is forecast to be lower at the end of the period than it is today and this follows the trend of the last 20 years although the rate of decline is forecast to be much more modest. It concludes that in 2040, Essex will have a demand of around 11 Mega litres per day less than today, despite a population increase of 100,000 people.
- **Essex & Southend Waste Local Plan (2001)⁷³**: Management of waste is guided by the Essex & Southend Waste Local Plan (adopted, 2001); the Replacement Waste Local Plan has been submitted for Examination and will address waste planning until 2032 including allocations for sites.
- **The Greater Essex Integrated County Strategy (2010)⁷⁴**: provides a shared vision across all local authorities in Greater Essex, identifying the priorities needed to achieve increased

⁶⁷ Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

⁶⁸ Climate Change Act 2008 <http://www.legislation.gov.uk/ukpga/2008/27/contents>

⁶⁹ Flood and Water Management Act (2010) <http://www.legislation.gov.uk/ukpga/2010/29/contents>

⁷⁰ Essex Biodiversity Project (2011) Essex Biodiversity Action Plan 2011 <http://www.essexbiodiversity.org.uk/biodiversity-action-plan>

⁷¹ Essex County Council & Capita Symonds (2013) Essex County Council Local Flood Risk Management Strategy available [online] <https://www.essex.gov.uk/environment%20Planning/environment/local-environment/flooding/flood-water-management-strategies/Pages/default.aspx>

⁷² Essex and Suffolk Water (2014) Water Resources Management Plan https://www.eswater.co.uk/assets/documents/ESW_Final_Published_PR14_WRMP_Report_-_V3_-_08OCT14.pdf

⁷³ Essex County Council & Southend Unitary Authority (2001) The Essex and Southend Waste Local Plan <https://www.essex.gov.uk/Environment%20Planning/Planning/Minerals-Waste-Planning-Team/Planning-Policy/Pages/Replacement-Waste-Local-Plan.aspx>

⁷⁴ Essex County Council (2014) Integrated County Strategy <http://www.essex.gov.uk/Your-Council/Strategies-Policies/Integrated-County-Strategy/Pages/Default.aspx>

economic growth. The broad strategic focus of the strategy is on the Thames Gateway, key towns and low carbon energy.

- **Greater Essex Growth and Infrastructure Framework 2016-2036 (2017)**⁷⁵: The Growth and Infrastructure Framework (GIF) is a strategic document and supporting dataset that draws together the planned population, housing and economic growth of Greater Essex. The aim is to deliver an assessment of the cumulative capital costs of infrastructure required to deliver this growth.
- **Essex Transport Strategy - the Local Transport Plan for Essex (2012)**⁷⁶: sets out the County Council's aspirations for improving travel in the county. Priorities include providing for and promoting access by sustainable modes of transport to and from development areas; improving journey times on congested routes; improving the attractiveness of cycling; and improving access to green spaces. Consideration will also need to be given to other Non-Motorised Users (NMUs) such as equestrians, as well as ensuring the connectivity and accessibility between the sustainable transport modes.
- **Harlow Open Space and Green Infrastructure Study (2012)**⁷⁷: assesses the quantity, quality and value of the open space and green infrastructure in the District. The study forms a key part of the evidence base for the emerging Local Plan and other local policies, and includes locally-derived standards for the provision of open space and recreational facilities in the area. It recommends that the approach to open space planning in the future will be on improving the quality of existing sites as well as meeting the quantitative needs of the future population.
- **Harlow Regeneration and Social Inclusion Strategy (2010)**⁷⁸: provides a framework for the Council to prioritise its own actions and activities, and to engage with and influence other relevant organisations. The strategy aims to support Harlow as a place with an economically thriving and inclusive community with the positive attributes and vibrancy of a city. The Strategy identifies the regeneration of Harlow's town centre as the Council's top corporate priority.
- **Harlow Contaminated Land Strategy (2008)**⁷⁹: sets out how land in the District which merits detailed individual inspection will be identified in an ordered, rational and efficient manner, and in what time scale.

Baseline information (environmental characteristics, problems and evolution without the plan)

Overview

Harlow District, which has a population of approximately 85,400 residents⁸⁰, is located in the west of Essex County, and is bordered by the Epping Forest District to the south, west and east; and East Hertfordshire District (in the county of Hertfordshire) to the north.

Harlow is 38km north of London and 50km south of Cambridge. It has good access to the M1 and the West Anglia Mainline railway and Stanstead Airport is located 24km to the north east. Harlow is the smallest local authority area in Essex, with a land area of 30.5sqkm.

In 1949, Fredrick Gibberd's masterplan for Harlow was established, to deliver the New Town. The current tight administrative boundary of Harlow, and subsequent small size of the District, is a legacy of the Harlow New Town designation. The masterplan 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.

After the main town centre, there are five neighbourhood centres which have been focussed around a shopping centre with easy access to social and educational facilities, connective by a series of

⁷⁵ Essex County Council (2017) Greater Essex Growth and Infrastructure Framework.

⁷⁶ Essex County Council (2012) Local Transport Plan.

⁷⁷ Land Use Consultants (2013) Harlow Open Space and Green Infrastructure Study.

⁷⁸ Essex County Council, West Essex NHS, Harlow District Council (2010) Harlow Regeneration and Social Inclusion Strategy (2010 – 2015).

⁷⁹ Harlow District Council (2008) Statutory Contaminated Land Strategy.

⁸⁰ ONS (2011).

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 designated to reflect the original landscape setting. The Green Wedges 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 are located in the north and northwest of the District which provide the District's main employment areas. Harlow has a slightly higher percentage of working age people than the East of England with a high level of self-containment. However, residents of Harlow earn less than the County average and less than the average income of employees who work within Harlow, suggesting higher paid jobs are being filled by those living outside of Harlow.

Housing affordability in the District has been a significant problem in more recent times. People in Harlow are living longer and more live alone resulting in smaller households, increasing the need for homes irrespective of growing population. The percentage of overall housing need for 2011-33 is 67%, considerably higher than East Herts (31%), Epping Forest (34%), and Uttlesfield (27%).

The District is largely urban, however 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% of the land being designated as the Metropolitan Green Belt. These are fundamental parts of the Green Infrastructure Network, linking to other open spaces and the countryside.

Harlow contains a number of locally designated and nationally designated biodiversity sites including two Sites of Special Scientific Interest. Harlow also has a rich heritage, including 10 Conservation Areas, highlighting the early architectural style and planning of the New Town.

Harlow is within close proximity to major transport corridors including 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 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.

Harlow only has two major connections to the national road network: Junction 7 on the M11, and the A414 at Burnt Mill. Junction 7 of the M11 is at capacity, and the A414 can become severely congested at peak periods.

In terms of sustainable transport options, the District has two railway stations; Harlow Town and Harlow Mill located in the north and north-east of Harlow. Cycleways are aligned with the footpath system running through Green Wedges and are extensive across the District. A number of locations in the highway network have designated bus lanes.

Air Quality

The Essex Air Quality Consortium identifies that traffic emissions are the most significant source of pollution in Harlow. The main roads in the District are the M11 and the A414. In addition, there are a number of industrial processes; the majority of these are located in the two main industrial areas of the town (Templefields (to the north) and Pinnacles (to the northwest)).

Air pollution in Harlow is considered to be generally low, and monitoring of local Air Quality has measured no exceedances of air quality objective at relevant exposure⁸¹. The Essex Air Quality Consortium state that the review and assessments to date have not identified any areas of concern or an Air Quality Management Area (AQMA). The trend across all monitored sites indicates that air quality is improving throughout Harlow.

Biodiversity

Harlow District is a predominately urban environment, however contains a number of national and local designated biodiversity sites. There are no European sites located within the District boundary. Harlow Woods Site of Scientific Interest (SSSI) is located to the south of Harlow and is made up of two units of broadleaved, mixed, and yew woodland – lowland habitat comprising three adjacent ancient semi-natural woods: Parndon Wood, Hospital Wood and Ridsen's Wood. The status of this

⁸¹ Harlow District Council (2017) Air Quality Annual Status Report.

site is unfavourable recovering (53.95%) and favourable (46.05%). Hunsdon Mead SSSI is located to the northwest of Harlow on the District's boarder. This site is a registered Common, comprising of unimproved grassland managed on the traditional ancient Lammas system of hay making followed by winter grazing. The status of this site is unfavourable recovering.

In terms of locally designated sites, there are a number of Local Wildlife Sites (LWSs) within the District, distributed in three distinct bands running east-west. There are also four Local Nature Reserves located within the District, to the north, south and east. A key habitat within Harlow area is the River Stort located along the northern border of the District. It is a wetland habitat with a wide range of wildlife species, including BAP priority habitats and species.

Harlow also contains a network of green space of particular importance to the character of the District and community-wellbeing. The Green Wedges and Green Fingers provide a series of connectable open spaces throughout the District, holding significant biodiversity value for the area.

Climate Change

The Government has set a target under the Climate Change Act 2008 to reduce CO₂ emissions by 80% by 2050, with an interim target of 34% by 2020, both against a 1990 baseline. The Government requires local planning authorities to adopt proactive strategies to mitigate and adapt to climate change and reduce the consumption of natural resources. For example, the impact of new development on climate change can be reduced by locating it where possible in places where it is not entirely necessary to rely on having access to a car; and by the design of carbon neutral homes which seek to achieve energy and water efficiency through sustainable construction and by increased use of renewable energy.

With regards to 'sustainable design and construction', the Local Plan's role is more limited, following Government's withdrawal of the Code for Sustainable Homes in March 2015. There is, however, the potential to minimise carbon emissions from the built environment by supporting decentralised, low carbon heat and electricity generation/transmission.

The Council's Carbon Management Plan (2016) shows that the 25% target reduction in its 2011 Plan has been achieved, and sets a target of reducing its operational carbon emissions by a further 25% by 2020/21 (from a baseline of 2014/15). The baseline represents 2700 tonnes CO₂ produced from Council operations including energy, waste and water usage. A target of 25% by 2020/21 will see these emissions reduced by 5% or 135 tonnes CO₂ each year.

Harlow is located within the River Stort Catchment. Tributaries of the River Stort that flow through Harlow include Harlowbury Brook, Todd Brook, Parndon Brook, Cannons Brook and Princey Brook. The Strategic Flood Risk Assessment Level 1 (2016) identifies that primary flood risk in Harlow is associated with the River Stort to the north of the town around Harlow Town station, Temple Fields north of the railway line, and south of the railway line at the A414 roundabout. These areas are located in Flood Zone 2. Some properties along Guilfords, in the east of Harlow, are also shown to be at risk from the Harlowbury Brook and are located in Flood Zone 2.

Areas identified to be at risk of surface water flooding are in the south of Harlow towards Todd Brook, and Temple Fields. Elsewhere, surface water flooding tends to be either flow paths or ponding along transport routes, or ponding of water in gardens or open land.

Community and Wellbeing

The Gibberd Masterplan for Harlow sets out self-providing neighbourhoods with strong local centres, which are separated by Green Wedges. Harlow was designed with a hierarchy of retail centres; which may now be described as: a town centre; five Neighbourhood Centres: Old Harlow, The Stow, Church Langley, Bush Fair, and Staple Tye; and 18 Hatches. Harlow has a very high population density of 36.8 people per hectare, compared to 4.7 for Essex and 4.1 for England.

In 2016, Harlow's population was recorded as being approximately 85,900 residents⁸², of which, 41,700 are male and 44,100 are female.

⁸² Nomis (2016).

In 2016, compared to the East (61.5%), Harlow had a higher proportion of residents aged 16-64 (62.9%), however this is marginally lower than that for Great Britain (63.1%). Of these people aged 16-64, 63.5% are male in Harlow, which again is higher than the figure for the East, and lower than the figure for Great Britain.⁸³ Population growth for the District is projected at 89,000 for 2020⁸⁴, an increase of 4.5%.

Less than half of all residents in Harlow are married (44.82%) which is lower than both the Essex (50.62%) and England (46.59%) figures. Harlow's proportion of residents registered in a civil partnership was recorded at 0.15% in 2011, which is comparable with the proportion of residents in the County (0.16%), however is lower than the national figure (0.23%). Harlow has a high proportion of divorcees with 10.76% being divorced in 2011. This is higher than the County figure (9.38%) and the England figure (8.97%).

The most recent 2011 census found that the majority of the population described their ethnic group as white British (83.86%), which is slightly lower than the average for Essex (90.76%) but higher than the average for England (69.75%). A further 4.16% described their ethnic group as 'Other', while 2.75% described their ethnic group as 'African'; which is considerably greater than that of Essex (0.87%) and England (1.84%).

The Indices of Multiple Deprivation (IMD) 2015 measures deprivation for seven sub-domains and also calculates an overall index score. In 2015, Harlow District was ranked 71/326 nationally, where the lowest number is the most deprived. This is significantly lower than neighbouring authorities Epping Forest (199/326), and East Hertfordshire (315/326).

At a local scale, the IMD (2015) measures how deprived a 'Lower Super Output Area (LSOA)' area (this is usually equal to or smaller than an electoral Ward) is compared with all of the other areas in the country, using a range of indicators. It then ranks them in order of deprivation with 1 being the most deprived area in the country, and 32,844 being the least deprived. There are a total of 54 Lower Super Output Areas within the District. The majority of the District experiences less deprivation than the rest of the country, according to the Indices of Deprivation (2015), with no LSOAs within the District falling within the 10% most deprived nationally.

There are, however, four LSOAs ranked within the 20% most deprived (2nd decile), and 17 LSOAs ranked within the 30% most deprived (3rd decile). These include parts of Todbrook and Nettleswell wards, which were both ranked within the 20% most deprived (2nd decile), along with parts of Mark Hall and Sumner and Kinsmoor on the south eastern edge of the District. Another two LSOAs within Mark Hall Ward fall within the 30% most deprived (3rd decile), along with two LSOAs in Nettleswell Ward, two in Harlow Common Ward, and the entirety of the Staple Tye Ward.

Pockets of deprivation have been identified within the District in relation to crime, and education and training. Particularly low levels of deprivation were identified in relation to living environment.

Overall, measures for health are good; the most recent 2011 census shows that 97.22% of Harlow's working age population had no limitations on their ability to carry out day-to-day activities. This is slightly lower than the Essex figure of 88.40%, but in line with the England figure of 87.25%. 7.54% of residents aged between 16 and 64 recorded that their day-to-day activities were limited a little which is higher than the figure recorded for Essex (6.83%) and England (7.14%).

In terms of general health, 70.08% of Harlow's population were in 'very good health' at the time of the 2011 census. This was slightly higher in Essex (74.78%) and in England (72.84%). The figures for the population in 'good health' in Harlow (55.69%) are more comparable with Essex (55.44%) and England (52.85%). Similarly, those who were recorded as being in 'very bad health' (1.88%) were comparable regionally (1.73%) and nationally (1.92%).

90.16% of Harlow's population receive no unpaid care compared with 89.51% in Essex and 89.76% in England. The highest amount of unpaid care in Harlow is between 1 and 19 hours per week (6.13%) compared with 6.94% in Essex and 6.51% in England.

⁸³ Ibid.

⁸⁴ Public Health England (2017) Harlow District Health Profile.

Economy and Employment

Harlow's economy has changed dramatically from its New Town origins. Large companies are no longer the hallmark of the economy, with 99.5% of Harlow's businesses now classified as small & medium-sized enterprises, employing less than 250 people. The vast majority of Harlow's businesses (86.9%) employ less than 10 people. Manufacturing has declined but still remains a very important element of the economy supporting 3,500 jobs.⁸⁵

Harlow has a 51 hectare Enterprise Zone (EZ), which is one of the 48 designated sites across the UK selected by Government to provide a platform for economic growth and deliver benefits for business.⁸⁶ At the heart of the London Stansted Cambridge corridor, Harlow, as a business location, is growing in significance as a location for world class knowledge-based businesses and organisations including Life Sciences (Public Health England), ICT & Digital (Arrow Electronics) and Advanced Manufacturing (Raytheon). Harlow has also experienced very strong growth in its business population and this is reflective of economic growth sectors in the wider London Stansted Cambridge Corridor (LSCC).⁸⁷

Harlow Town Centre is the only defined 'Town Centre' within the District. It is the focus for the District's comparison goods shopping, although the retail parks of Edinburgh Way also have a large comparison goods offer, which compete for spending with the Town Centre. Additionally, Harlow Town Centre has a range of employment facilities (including the Civic Centre), leisure facilities (including cinema, bowling, gyms and bingo) and three supermarkets (Tesco Metro and a large Asda store within the main centre and a large Sainsbury's to the north of the Town Centre). The centre is pedestrianised throughout and much of the 'prime pitch' retail offer is occupied by national multiple retailers, particularly in the covered Harvey Centre and the Water Gardens, a southern extension to the Town Centre which opened in 2003/4.⁸⁸

The Town Centre has been the main shopping channel for centuries, but in the face of new forms of e-tailing (i.e. online shopping) and m-tailing (shopping through mobile phones, tablets, etc.) competition, centres will need to continue to adapt in order to remain viable shopping destinations. The health check assessment for Harlow Town Centre confirms that there remains under-provision of leisure and social activities as well as traditional retailing with increased bars, restaurants, food outlets and community spaces.⁸⁹ There is also a lack of higher-end retailers in the centre; with evidence showing A1 Town Centre primary frontages have reduced from 78% in 2003 to 60% in 2017 mainly due to large store closures. Additionally, 10.5% of primary frontages and 20.5% of secondary frontages were vacant in June 2017. This may partly be a reflection of the current demographic profile of the area.⁹⁰

Harlow has a slightly higher percentage of working age people (16-64) than the East of England. Of these, 67.7% are economically active, which is higher than that of the East of England, but lower than that of England as a whole⁹¹. Currently, however, Harlow residents do not take advantage of the higher-skilled, higher-paid jobs in the Town.⁹² Residents of Harlow earn less than the county average and less than the average income of employees who work in Harlow, suggesting that higher paid jobs are being filled by those living outside of the District.

In 2011⁹³, the proportion of the District's residents with no qualifications was higher than the average for the East of England and for England as a whole. However, more of the District's residents had Level 1 and Level 2 qualifications, than the average for the East of England or the average for England as a whole. Nevertheless, there are less of the District's residents with Level 3, and Level 4 and above qualifications than the average for the East of England and for England as a whole.

⁸⁵ Harlow Council (2017) Harlow Economic Development Strategy

⁸⁶ Harlow Council (2017) Harlow Corporate Plan

⁸⁷ Ibid.

⁸⁸ Harlow Council (2017) Retail and Leisure Needs Study

⁸⁹ Harlow Council (2017) Retail and Leisure Needs Study

⁹⁰ Harlow Retail Frontages Study 2017

⁹¹ ONS (2011)

⁹² Harlow Council (2017) Harlow Economic Development Strategy

⁹³ Ibid.

Historic Environment

Harlow District is largely urban and its historical value is largely reflected in its designation as a New Town in 1947. The layout and architecture of the town is strongly linked to the concepts set out in Sir Fredrick Gibberd's Master Plan.

The District currently has ten Conservation Areas, designated for their special architectural or historic interest. There are also, 11 Scheduled Monuments, 1 Registered Park/Garden, and 168 listed buildings in Harlow. The Council has also sought to identify buildings and structures that have not been identified nationally for listing but which contribute towards the District's distinct character and historic environment.

Housing

The 2011 Census recorded over 35,800 dwellings in the District and 34,700 households. This is expected to rise to approximately 40,745 dwellings and 39,455 households by 2033.

The census also provides detailed information about occupancy, which provides a measure of whether a household's accommodation is overcrowded or under occupied. When considered by tenure, Harlow has seen a more modest increase (+21%) including a reduction in owned (-4%), but with a larger increase in private rent (+38%) and social rented (+21%).

Harlow's property prices are lower than other parts of Essex. However, the affordable housing percentage requirement in Harlow is 61%, compared to 35% in Epping Forest, 32% in East Hertfordshire and 26% in Uttlesford. The number of households on the housing register in Harlow rose from 1,900 to 3,300 over the period 2001-2014.

Land and Waste

Although the District is largely urban, 10% of the land is currently designated as being in the Metropolitan Green Belt. There are also large areas of Green Wedges and Green Fingers in Harlow, which, alongside the Green Belt, prevent neighbourhood coalescence. The Gibberd plan shaped the development of Harlow and allowed for the designation of large landscaped areas of Green Wedges to separate out neighbourhoods and compensate for small garden spaces. These remain a *"fundamental element of the network of green spaces within Harlow"*. The town also contains a Town Park and other smaller green spaces of internal open space existing within the residential and business areas of the town.

The Agricultural Land Classification (ALC) for Harlow District is that of an urban area, however; the periphery of the District and the neighbouring areas contain land of high agricultural quality (Grade 2 and Grade 3) and are of a traditional farmland character. The soil types on the periphery of the District include: surface water gleys to the southwest; pelosols to the south and east, and; water and brown soils to the northwest and northeast.

In terms of the District's Waste Performance for 2015/16, the total recycled or composted (45.3%) is lower than the authority average.⁹⁴

Landscape

National policy and legislation supports the protection and improvement of the natural environment through measures such as the development of green infrastructure networks and through habitat and species protection together with the achievement of net gains in biodiversity.

The original Harlow Master Plan utilised a 'landscape-led' approach for Harlow, which shaped the town's urban environment and linked strongly to the surrounding countryside. In addition to Green Wedges (linear open spaces) forming the urban structure of the town's neighbourhoods, and the Green Belt on the periphery of the District, the District contains large amounts of designated open space. The Town has numerous physical and visual links from the town centre to the surrounding countryside through these Green Wedges, which *"encapsulate natural features such as valleys, woods and brooks"*. The Stort River corridor separates the town from the undulating and rolling

⁹⁴ Essex Waste Partnership (2015) Essex Waste Partnership Performance Tables.

landscape to the north, and there is a pronounced north-facing ridge slope to the south of the town which “visually and physically contains the urban area from the open countryside to the south”.

In terms of landscape constraints, there are three areas designated as Special Landscape Areas within the District, which are areas that have a “special visual quality that distinguishes them from other tracts of countryside⁹⁵”. These are located in the north-western corner, south-western corner and north-eastern corner and fall within designated Green Belt land.

Harlow District is located within the National Character Area (NCA) 86: South Suffolk and North Essex Clayland. It lies in the south of this area, close to the border with the Northern Thames Basin NCA 111. NCA 86 is “Broadly flat, chalky, boulder clay plateau dissected by undulating river valley topography, particularly marked in upper valley reaches, which are much smaller in scale.”

Transport

Harlow is a regional transport node and is part of the Harlow and Stanstead/ M111 Corridor strategy area for Essex.

Harlow is located in the south of the East of England close to London, and has excellent access to the major international airport of Stansted (20 minutes away), Cambridge, London, and links to the M25 and the Channel Tunnel. Key transport routes are provided by the M11 and A414, and the local rail provides direct rail links to London via the London Liverpool Street line of the West Anglia Network. This provides direct access to London, Stansted Airport and Cambridge (with onward connections to the East Coast Mainline, Norwich and Kings Lynn). Harlow Town and Harlow Mill train stations are located in the north of the district, with the train line running west-east in the District, and there is another station located at Roydon to the west of the District. However, “while Harlow is well located in terms of proximity to Stanstead and the M11, the current strategic transport linkages are currently inadequate and compromise the original vision for transport and connectivity by Gibberd”.

The M11 and the A414 carry large volumes of traffic and have a direct influence upon the daily traffic patterns and conditions in Harlow and on the immediately adjacent highway network. The most notable area of congestion is on the routes and links to Junction 7 of the M11 (Harlow’s principal access to the strategic motorway network), but primarily on the A414 (a busy, major intra-regional highway route, serving both local traffic and longer distance through traffic connecting to the motorway network). The main highway links and junctions throughout Harlow regularly experience congestion and delay, and this is likely to get worse as car ownership continues to rise. Furthermore, the reliance on only one junction is unusual for a town of the size and character of Harlow. Other major roads include: the A1184 – provides access to Harlow and Junction 7 of the M11 (via A414) and Sawbridgeworth to the north; the A1169 – links to the A414; the B181 – runs north-south from Roydon to Epping and provides access to the A414; the B1393 – runs north-south, and; the B180.

The Harlow area also has several public footpaths and bridleways, to include Stort Valley Way and Three Forests Way, and National Cycle Route 1 runs through the area.

It should be noted that a Sustainable Transport Corridor Study for Harlow and Gilston Garden Town is currently being prepared.

Water

National policy sets out that local authorities should adopt proactive strategies in regard to climate change resilience and take full account of water supply and demand considerations. They should include local plan policies to deliver the provision of infrastructure including waste management, water supply and wastewater.

Harlow is located within an area of serious water stress, which will be exacerbated due to climate change and future growth and development.

Harlow falls into the Upper Lee catchment area and portable drinking water in the District is provided by Affinity Water. Across Affinity Water’s Central Region area, which Harlow is located in, the Water

⁹⁵ Chris Blandford Associates (2005) Harlow Area Landscape and Environment Study.

Resources Management Plan (2014) sets out water related infrastructure projects which will ensure there is not a water deficit.

Thames Water is responsible for waste water in Harlow and the surrounding area, ensuring infrastructure is in place to accommodate anticipated growth. In this context, the Rye Meads Sewage Treatment Works (STW) is currently being upgraded to increase capacity. The upgrade will provide Rye Meads STW with a treatment capacity of 447,134 Population Equivalent.

Thames Water position statement (2017) indicates that capacity in the Treatment Works is expected up to 2036; however upgrades may be required in sludge and storm streams. Further network modelling and growth review is being undertaken by Thames Water to understand sewer capacity in the area before outlining further intervention solutions. Harlow Council commissioned a Water Cycle Study Phase 1 Update and the Draft Report did not identify any issues which require further assessment by a Phase 2 study.⁹⁶

What is the situation without the Plan

There can be many factors that may influence the future of the District's baseline. In terms of biodiversity, without careful strategic planning proposed through the Plan, habitats and species have the potential to come under increased pressure from the provision of new housing, employment and infrastructure in the District, resulting in fragmented, poor quality natural environments, characterised by simplified land use, and lacking in diversity. As well as being ecologically less resilient, a landscape of disconnected fragments is also less likely to be valued by people as it lacks the aesthetic appeal, opportunities for recreation and historical and other features linked to a sense of local identity.

Habitat loss/fragmentation will be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. Climate change is anticipated to have major effects on other constraints in the District; including the extent and frequency of flooding. There is a need to take cross-cutting action through spatial planning to address flood risk, as without the Plan, the effects of climate change may be more severe and the District less well prepared through missed adaptation opportunities and unforeseen mitigation opportunities.

Strong, spatial planning also has the potential to drive forward change in terms of energy efficiency and the incorporation of renewable energy within the built environment. The District already has limited existing renewable energy and therefore without the Plan, the potential for different forms of renewable energy may not be reached, with CO₂ emissions for the District likely continuing to rise. Rising CO₂ emissions can be attributed to future transport problems, such as those relating to the existing transport linkages along the Harlow and Stanstead/ M11 corridor. Housing and employment provision has the potential to increase traffic flows without appropriate locational policies and interventions, which is likely to be a considerable issue for the District considering the high percentage of travellers to work. Areas of particular sensitivity to increased traffic flows are likely to be routes with the largest congestion issues, including the routes and links to Junction 7 on the M11 and the A414.

Existing planning policy encourages the efficient use of land and a preference for the development of brownfield land where possible. Future housing, employment and infrastructure growth is likely to result in further loss of open space and agricultural land, and may also impact on the fabric and setting of cultural heritage assets. This includes through inappropriate design and layout in the District's neighbourhood centres. It should be noted, however, that existing historic environment designations will offer a degree of protection to cultural heritage assets and their settings. New development without the Plan also has the potential to lead to incremental changes in landscape and townscape character and quality in and around the District. This includes from the loss of/damage to the three Special Landscape Areas within the District, and also through visual impact.

In terms of communities, without the Plan, Harlow's Neighbourhood Centres may fail to provide essential facilities and services within walking distance for local residents, failing to meet the requirements of 'self-sufficient' neighbourhoods. While regeneration plans for neighbourhood areas may go ahead without the Plan (for example through the direction of the Harlow Town Centre AAP),

⁹⁶ Harlow Council (April 2018) Water Cycle Study Update Draft Report. Prepared by JBA Consulting.

this may not deliver joined-up strategic thinking based upon the original Gibberd concept and town needs.

Without the Plan, issues of connectivity between Harlow and the surrounding areas may be perpetuated and there may be a lack of private investment in employment/retail provision. This may have an adverse effect on the economic prosperity of the District, and the functionality of Harlow as a sub-regional centre.

Appendix III: SA of site options

Introduction

As explained within Chapter 4 above, site options have been appraised for completeness and to help inform the development of District-wide spatial strategy alternatives.

The aim of this appendix is to:

1. explain the Council's site selection process;
2. explain the site options appraisal methodology; and then
3. present the outcomes of the site options appraisal.

Council's site selection process

The Council produced in 2014 a Strategic Housing Land Availability Assessment (SHLAA) as required by the NPPF. This assessment helps to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

Sites for assessment were selected from the following sources:

- Call for Sites exercise (sites put forward as part of the Call for Sites). The Council's Planning Consultation database and local knowledge was used to compile a list of bodies and individuals, including developers to contact to ascertain if they wished to promote land in their ownership for development. Forms and an explanatory letter were sent out to those parties interested;
- Potential Council assets were also identified (i.e. Sites put forward by the Council's Assets and Facilities team through the Call for Sites);
- Sites Previously Considered were evaluated (Sites which had been included in past studies, e.g. Local Plan sites, early capacity study surveys, expired permissions);
- Urban Capacity Study 2006 (Study undertaken by consultants looking at previously developed land); and
- Other Candidate Sites were considered (sites which were excluded in the other sources. These included playing fields, allotments, school sites, town park, other Green Wedge sites and open space).

The SHLAA exercise identified 369 potential sites (the majority of open land in the District), which for completeness have all been subject to appraisal through the SA process with the findings set out in Table C below. These 369 sites were subjected to a sieving process to identify land which was suitable for residential development excluding those subject to specific constraints. Initial sieving included SSSI's; flood zones etc.; land such as statutory allotments; school playing fields; and the Town Park were also discounted. In addition, a small number of sites were rejected as having no potential to deliver housing or would yield less than six dwellings. This assessment reduced the original list of 369 potential sites down to 59 developable sites.

The developable sites were considered by members of the Local Plan Panel in November 2013 along with the proposed changes to reported Green Belt and Green Wedge Study proposals (see below). The sites were scrutinised again by the Panel in December 2013.

The sites that were potentially suitable for development were identified in the public consultation on the Emerging Strategy and Further Options Consultation 2014, and associated summary leaflet. The Green Wedge and Green Belt Studies of 2014 and 2016 identified land which did not fulfil the purposes of those designations. This resulted in the identification of sites in the SHLAA that could be considered for other uses without prejudicing Green Wedge and Green Belt policies. The Green Wedges are, in particular, an important component of the original Master Plan for Harlow. The

principles of the Green Wedges were enshrined and carried forward in subsequent development plans for the District, with the following roles:

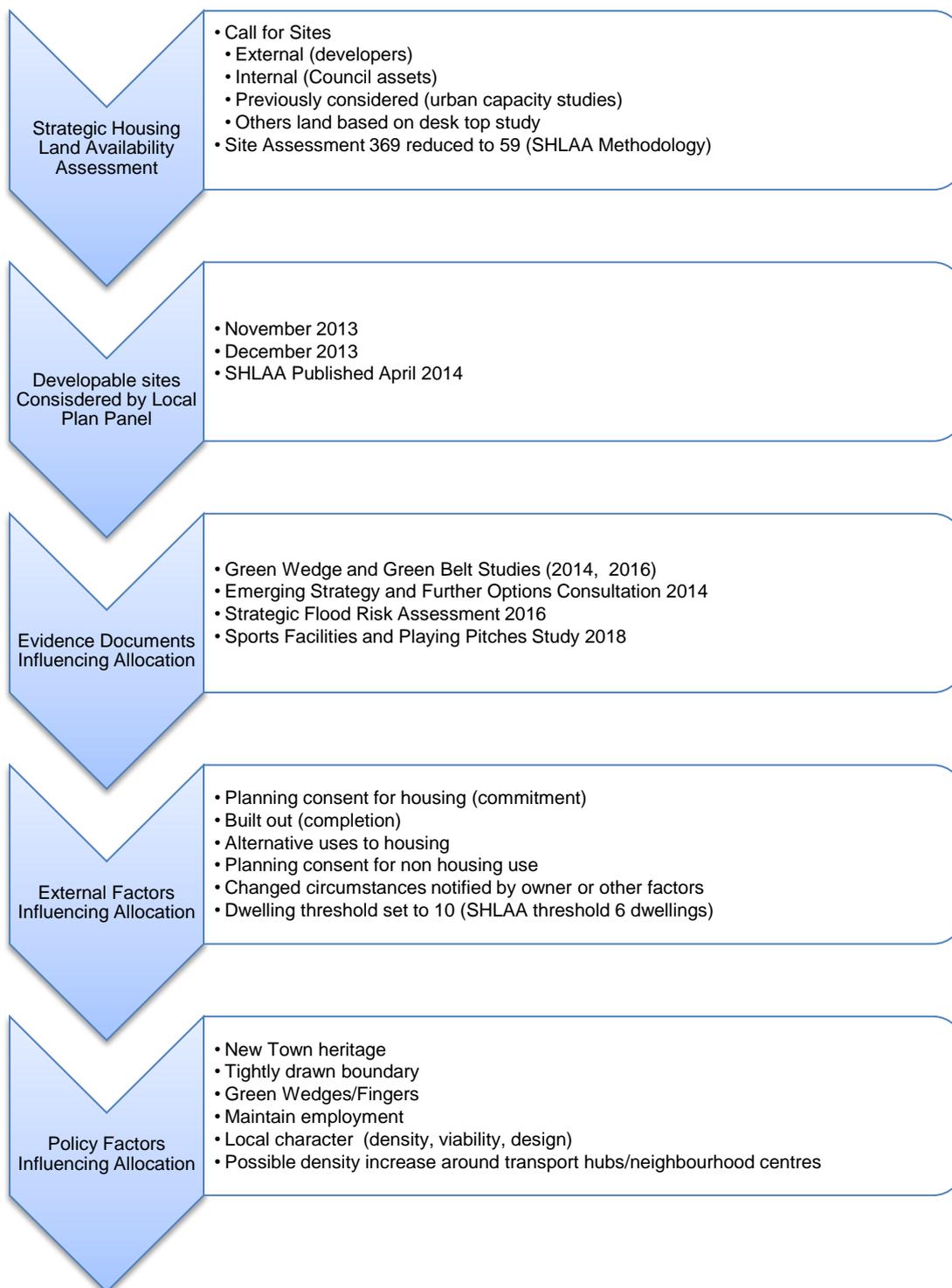
- to provide a visual and physical separation between neighbourhood clusters and between housing and industry;
- to preserve the natural features of the town, and provide natural habitats for the benefit of people and wildlife;
- to introduce a rural character to parts of the town; and
- to provide for a range of informal recreation.

These roles are strongly supported by the Council and the general public, as shown in the response to the Issues and Options Consultation in January 2011. Consequently the Green Wedges are rigorously protected by current policy and, based on the Green Wedge Review, will continue to be so in the emerging Local Development Plan. This means there is no scope for the identification of further housing sites in the District's Green Wedges.

A Strategic Flood Risk Assessment was undertaken by consultants in in 2016. One of its requirements was to assess the developable sites against the possibility of flooding. Whilst there was a small effect on a limited number of sites, none were considered ruled out because of such issues.

The Sports Facilities and Playing Pitches Study (2018) reviewed playing pitch provision in Harlow in order to inform policy development in the emerging Local Development Plan. Arising from this review and detailed assessments, no surplus play pitches were identified. Consequently no opportunity has arisen to bring forward additional housing sites on surplus playing pitches.

Following the completion of the various technical assessments, the number of potential developable sites originally considered has been reduced further either because of physical constraints or because the sites are no longer being promoted by the land owner as they are being retained for other uses. Additionally some of these sites now have the benefit of planning consent for housing development and are now regarded as a commitment or have been built out and considered a completion. These sites are still relevant, however, and contribute to the overall housing land supply. Other sites have been excluded due to a variety of factors. The site may have become unavailable since previous consultations due to alternative uses being put forward by the land owner or planning permission has been obtained for an alternative use, or because of changed circumstances as indicated by the site owner. The dwelling number threshold for allocations was set at 10 dwellings which then excluded developable sites below that threshold. The figure below sets out the process:



Overall the District’s New Town heritage has restricted options for major growth beyond that identified for allocation. The tightly drawn District boundary and the essential Green Wedges which are a key spatial element of the character of the Garden Town, reduce the opportunity of reasonable housing site options being identified. Evidence suggests that there is a need to maintain existing employment areas to meet future employment needs in Harlow which effectively rules out such locations being considered for housing.

Developing the appraisal methodology

Given the number of site options and limited site-specific data availability it was not possible to simply discuss ('qualitative analysis') the merits of each site option under the SA framework (i.e. take an approach to analysis as per that taken to the appraisal of spatial strategy options - see **Appendix IV**).⁹⁷

As such, work was undertaken to develop a methodology suited to site options appraisal, whilst also reflecting the SA framework as best as possible. The methodology essentially involved employing GIS data-sets, and measuring ('quantitative analysis') how each site option related to various constraint and opportunity features.

Two GIS tools were used to undertake the appraisal of site options depending on the feature and measurements required. These provided either a:

- Straight line distance from a feature to a site option and percentage overlap of any features within a site option. Measurements were taken from the closest boundary of the site option and the feature.
- or
- Distances calculated from a site option to a feature along a real world network of roads and urban footpaths using Ordnance Survey Integrated Transport Network. The network analyst tool helps to provide approximate real world walking distances. Measurements are taken from the boundary of the site where it is within 20m of the road/ footpath network and is therefore assumed to have access.

The site options appraisal methodology is presented in **Table A** below. It sets out the criteria and thresholds as well as the GIS tool used and provides further commentary as necessary. The table recognises data limitations. It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well/ poorly. The intention is not to indicate a 'significant effect'.⁹⁸

⁹⁷ Qualitative analysis of site options would only have been possible were time/resources available to generate data/understanding for all site options through site visits and discussion with promoters. Without this data/understanding, any attempt at qualitative analysis would have led to a risk of bias (e.g. sites that are being proactively promoted may have been found to perform favourably).

⁹⁸ Whilst Regulations require that the SA process identifies and evaluates significant effects of the draft plan and reasonable alternatives, there is no assumption that significant effects must be identified and evaluated for all site options considered. See Part 1 of this report for a discussion of how reasonable alternatives have been considered through the Harlow Local Plan / SA process, and in particular see Chapter 6 for an appraisal of the reasonable alternatives at the current time.

Table A: Site options appraisal methodology

Criteria	'RAG' rules	Data and measurement	Commentary
Intersects with a flood zone?	<p>R = > 50% intersects with Flood risk zone 2 or 3</p> <p>A = < 50% intersects with Flood risk zone 2 or 3</p> <p>G = Flood risk zone 1</p>	Data provided by the Environment Agency. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within high flood risk areas. N.B. While it is important to avoid development in flood zones, there is the potential to address flood risk at the development management stage, when a 'sequential approach' can be taken to ensure that uses are compatible with flood risk. There is also the potential to design-in Sustainable Drainage Systems (SuDS).
Proximity to a Special Protection Area, Special Area of Conservation or Ramsar site?	<p>A = <4km</p> <p>G = >4km</p>	Data provided by Natural England and includes sites lying outside of the District. Straight line distance/ overlap measurement.	It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This will be dependent on a variety of information, some of which is not available at this stage, such as the precise scale, type, design and layout of development as well as level of mitigation to be provided. It is also important to note that the Local Plan will be subject to Habitats Regulations Assessment and this will consider the likelihood of proposed development having a significant effect on European sites.
Proximity to a Site of Special Scientific Interest (SSSI)?	<p>R = <200m</p> <p>A = 200 - 800m</p> <p>G = >800m</p>	Data provided by Natural England and includes sites lying outside of the District. Straight line distance/ overlap measurement.	The data for SSSIs is provided by NE and includes sites lying outside of the Borough. NE has defined SSSI Impact Risk Zones for SSSIs. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Given the presence of SSSIs within and surrounding the Borough impact risk zones cover the majority of the plan area. The RAG distances have been selected to take account of this and help differentiate between the sites options. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a SSSI. This will be dependent on a variety of information, some of which is not available at this stage, such as the precise scale, type, design and layout of development as well as level of mitigation to be provided.
Proximity to a Local Wildlife Site?	<p>R = Includes or is adjacent</p> <p>A = <50m</p> <p>G = >50m</p>	Data provided by Harlow Council and does not include sites lying outside of the District. Straight line distance/ overlap measurement.	The data for Local Wildlife Sites (LWS) has been provided by Harlow Council and does not include LWS lying outside the District. There are a number of LWS situated within the District and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than European sites / SSSIs.
Proximity to a Local Nature Reserve	<p>R = Includes or is adjacent</p> <p>A = <50m</p> <p>G = >50m</p>	Data provided by Harlow Council and includes sites lying outside of the District. Straight line distance/ overlap measurement.	There are a number of Local Nature Reserves (LNRs) situated within and around the District and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than European sites / SSSIs.
Intersects with a priority habitat?	<p>A = Intersects</p> <p>G = Does not intersect</p>	Data provided by Natural England. Straight line distance/ overlap measurement.	Highlights those site options that contain priority habitat.

Criteria	'RAG' rules	Data and measurement	Commentary
Proximity to a Conservation Area?	R = Intersects or is adjacent A = <50m G = >50m	Data provided by Harlow Council and does not include features outside the District. Straight line distance/ overlap measurement.	It is appropriate to 'flag' a red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset. It is also recognised that the historic environment encompasses more than just designated heritage assets. Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop each of the sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis rather than through a distance based criteria. It will also sometimes be the case that development can enhance heritage assets. The likely effects of the draft plan, including reasonable alternatives, on the historic environment has been considered in Parts 1 and 2 of the main SA Report.
1027 Proximity to a Historic Park or Garden?	R = Intersects or is adjacent A = <50m G = >50m	Data provided by Historic England and includes assets lying outside of the District. Straight line distance/ overlap measurement.	As above.
Proximity to a Scheduled Monument?	R = Intersects or is adjacent A = <50m G = >50m	Data provided by Historic England and includes assets lying outside of the District. Straight line distance/ overlap measurement.	As above.
Proximity to a listed building?	R = Intersects or is adjacent A = <50m G = >50m	Data provided by Historic England and includes assets lying outside of the District. Straight line distance/ overlap measurement.	As above.
Proximity to an existing employment area?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to strategic employment areas. There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Proximity to the town centre?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council. Network analyst measurement.	Highlights walking distance to the town centre. There is no clear guidance on distance thresholds, and it is recognised that neighbourhood centres will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Proximity to a	R = >800m	Data provided by Harlow Council	Highlights walking distance to neighbourhood centres. There is no clear guidance on

Criteria	'RAG' rules	Data and measurement	Commentary
neighbourhood centre?	A = 400-800m G = <400m	and does not include features outside the District. Network analyst measurement.	distance thresholds, and it is recognised that neighbourhood centres will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Proximity to a shopping area?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to a shopping area. There is no clear guidance on distance thresholds, and it is recognised that shopping areas will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Proximity to a school?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council includes features outside the District. Network analyst measurement.	Highlights walking distance to a school. Department for Transport guidance ⁹⁹ suggests 800m as a walkable distance for those accessing community facilities.
Proximity to a Doctor or Health Centre?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council and includes features outside the District. Network analyst measurement.	Highlights walking distance to a Doctor or Health Centre. Department for Transport guidance ¹⁰⁰ suggests 800m as a walkable distance for those accessing community facilities.
Proximity to a sports and health facility?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to a leisure centre. Department for Transport guidance ¹⁰¹ suggests 800m as a walkable distance for those accessing community facilities.
Proximity to a playground?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to a playground. Department for Transport guidance ¹⁰² suggests 800m as a walkable distance for those accessing community facilities.
Proximity to an allotment?	R = >800m A = 400-800m G = <400m	Data provided by Harlow Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to an allotment. Department for Transport guidance ¹⁰³ suggests 800m as a walkable distance for those accessing community facilities.
Proximity to a bus stop?	R = >400m G = <400m	Data provided by Harlow Council and does not include features outside the District. Network	Highlights walking distance to a bus stop. Department for Transport guidance ¹⁰⁴ suggests 400m as a walkable distance for those accessing a bus stop.

⁹⁹ WebTag (December 2015) Unit A4.2 paragraph 6.4.5, Department for Transport

¹⁰⁰ Ibid.

¹⁰¹ Ibid.

¹⁰² Ibid.

¹⁰³ Ibid.

¹⁰⁴ Ibid.

Criteria	'RAG' rules	Data and measurement	Commentary
		analyst measurement.	
Proximity to a train station?	A = >800m G = <800m	Data provided by Harlow Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to a train station. Department for Transport guidance ¹⁰⁵ does not suggest a walkable distance for a train station so it is assumed that 800m is appropriate. This is in line with what is suggested for access to community facilities.
Proximity to a public right of way (PRoW)?	A = >50m G = <50m	Data provided by Harlow Council and does not include features outside the District. Straight line distance/ overlap measurement.	Highlights the proximity of site options to PRoW. Where a PRoW falls within a site it is assumed that this can be retained or an alternative route provided to ensure that links are not severed. It is also assumed that the closer a development is to a PRoW the more likely there is for an opportunity to enhance.
Proximity to a cycle route?	A = >50m G = <50m	Data provided by Harlow Council and does not include features outside the District. Straight line distance/ overlap measurement.	Highlights the proximity of site options to a cycle route. Where a cycle route falls within a site it is assumed that this can be retained or an alternative route provided to ensure that links are not severed. It is also assumed that the closer a development is to a cycle route the more likely there is for an opportunity to enhance.
Is the site within an area that suffers from problems of overall deprivation?	R = Site does not intersect with an 'output area' that is relatively deprived A = Any of the site intersects with an 'output area' that is relatively deprived i.e. in the 20-40% (2nd quintile) most deprived in the district. G = Any of the site intersects with an 'output area' that is relatively deprived (i.e. in the 0-20% (1st quintile) most deprived in the district	Data provided by Department for Communities and Local Government. Straight line distance/ overlap measurement.	Highlights site options that fall within an area of deprivation. Development in an area of relative deprivation (as measured by the Index of Multiple Deprivation) may support regeneration. However, it is recognised that this will be dependent on a variety of factors, including the level of improvements delivered in terms of community facilities.

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¹⁰⁵ Ibid.

Appraisal findings

Table B and C present appraisal findings in relation to the site options and allocations that have been a focus of plan-making. Specifically, the tables present an appraisal of the site options/ allocations in terms of the 24 appraisal criteria (Table A), with performance categorised on a simple 'RAG' scale.

Table B: Housing and Employment Allocations

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
HS2-1	Princess Alexandra Hospital	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Red	Yellow	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green
HS2-2	The Stow Service Bays	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
HS2-3	Land east of Katherines Way, west of Deer Park	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Yellow	Yellow	Green	Green	Green	Yellow	Green	Green
HS2-4	Lister House, Staple Tye Mews, Staple Tye Depot and the Gateway Nursery	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green
HS2-5	Land south of Clifton Hatch	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Yellow	Green	Yellow	Green	Yellow	Green	Green
HS2-6	Riddings Lane	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Red	Yellow	Green	Green	Red	Yellow	Yellow	Yellow
HS2-7	Kingsmoor Recreation Centre	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Yellow	Green	Green	Red	Red	Yellow	Yellow	Yellow
HS2-8	The Evangelical Lutheran Church, Tawneys Road	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
HS2-9	Land east of 144-154 Fennells	Green	Green	Red	Red	Red	Yellow	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Green	Green	Red	Green	Yellow	Green	Green
HS2-10	Pollard Hatch plus garages and adjacent land	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Green	Green	Red	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
HS2-11	Land between Second Avenue/St. Andrews Meadow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Yellow	Green	Yellow	Green	Yellow	Yellow	Yellow
HS2-12	Coppice Hatch and garages	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Yellow	Green	Green	Yellow	Yellow	Yellow
HS2-13	Sherards House	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow
HS2-14	Elm Hatch and public house	Green	Green	Green	Red	Green	Green	Red	Green	Yellow	Yellow	Red	Red	Red	Green	Yellow	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
HS2-15	Playground west of 93 – 100 Jocelyns	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Green	Red	Yellow	Green	Yellow	Green	Red	Green	Yellow	Green	Yellow
HS2-16	Fishers Hatch	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Green	Green	Yellow	Red	Green	Green	Green	Yellow	Yellow	Yellow
HS2-17	Slacksbury Hatch and associated garages	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
HS2-18	Garage blocks adjacent to Nicholls Tower	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Green	Green	Green	Green	Yellow	Yellow	Green
HS2-19	Stewards Farm	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green
HS2-20	Land between Barn Mead and Five Acres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Green	Red	Green	Green	Yellow	Green	Yellow	Green	Green

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
HS2-21	Pypers Hatch	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Yellow	Yellow
HS3	Strategic Site to the East of Harlow (north)	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Yellow	Red	Red	Red	Red	Yellow	Red	Green	Yellow	Yellow	Green	Yellow	Green	Yellow
HS3	Strategic Site to the East of Harlow (south)	Green	Green	Green	Red	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Red	Green	Red	Green	Green	Green	Green	Yellow	Green	Green
ED1-01	Harlow Business Park, The Pinnacles	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Yellow
ED-02	London Road	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Red	Green	Red	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Green	Green
ED1-03	East Road, Templefields	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow

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Table C: SHLAA site options

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
1	The Angle	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Yellow	Yellow	Green	Yellow	Yellow	Green	Green	Yellow	Yellow	Green
126	Land at Latton Farm west of Puffers Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Yellow	Red	Red	Red	Yellow	Yellow	Yellow	Green	Green	Green	Green	Yellow	Green	Green
127	Land adjacent to Latton Farm Buildings, Puffers Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Red	Red	Yellow	Yellow	Yellow	Red	Green	Green	Green	Green	Yellow	Green	Green
128	Land south of Markhall Wood, north Puffers Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Yellow	Yellow	Yellow	Green	Yellow	Green	Green
129	Land south of Nortel car park	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Green	Red	Yellow	Yellow	Red	Yellow	Green	Green	Yellow	Green	Green
130	Ladyshot Playing Field	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Red	Red	Green	Red	Red	Red	Green	Yellow	Green	Yellow	Yellow	Yellow
131	Land at junction Momples Rd./First Ave (east)	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Red	Yellow	Yellow	Yellow	Red	Yellow	Green	Green	Green	Yellow	Green	Green
132	Land at junction Momples Rd./First Ave (west)	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Red	Green	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Green	Green
133	Mark Hall Park, Muskham Rd.	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green
134	Land north of Bromley Close	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
135	Land between Fern Hill Lane and Hilly Field	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Yellow
136	Land North of Sakins Croft	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Green	Yellow	Green	Yellow	Yellow	Yellow

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
137	Playing Field east of Five Acres north of Southern Way	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Yellow
138	Land between Aylets Field and Latton Bush Centre	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Yellow
139	Barn Mead Playing Field	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Green	Yellow	Green	Yellow	Green	Green
14	Purford Green School	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
140	Land between Church Leys and Tillwicks Rd.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
141	Playing Field south of Second Ave, west of Tillwicks Rd.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Yellow	Red	Yellow	Green	Yellow	Green	Yellow	Green	Green
143	Landjunction of Second Ave/Howard Way south of Long Ley	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Green	Red	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
144	Land west of 31,32 Rye Hill Rd.	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Yellow
145	Land west of Rye Hill reservoir	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Yellow
146	Land south of Parndon Wood Crematorium and Parndon Wood	Green	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow
147	Land rear of 1-20 Rye Hill Rd.	Green	Green	Red	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Red	Red	Red	Red	Green	Yellow	Green	Green
148	Land south of Hospital Wood	Green	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow
149	Playing field south of Fennels	Green	Green	Red	Red	Red	Yellow	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Yellow	Green	Red	Red	Yellow	Green	Green

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
150	Field to rear of 57-60 Fennels																							
151	Sports field west of Thurstons and Fennels																							
152	Field to rear of 98-117 Markwell Wood																							
153	Land adjacent to 97 Markwell Wood																							
154	Sports field east of Markwell Wood																							
155	Playing field to the east of Shawbridge																							
156	Land south of Third Ave.north of former Passmores school																							
157	Land north east of Passmores House																							
158	Land south of Passmores House, north of Willowfield																							
159	land west of Passmores House, east of Abercrombie Way																							
160	Land at the junction of Third Ave./Abercrombie Way																							
162	Land west of Hester House off Hodings Rd.																							
163	Land north of Parsloe Rd.east of Standingford																							

1036

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
164	Recreation ground west of the Maples & Burnett Park	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Green	Yellow	Red	Green	Yellow	Green	Green
165	Playground and land west of Burnett Wood	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Yellow	Yellow	Green	Green	Red	Green	Yellow	Green	Yellow
166	Land to the east of Mallows Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Green	Red	Green	Red	Green	Yellow	Green	Green
167	Land east of Sumners Leisure Centre	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Green	Red	Green	Yellow	Green	Yellow	Green	Yellow
168	Land east of Dunstalls & Sycamore Field	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
169	Sports ground west of 48-57,59 and 81 Millwards	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Green	Red	Green	Yellow	Green	Yellow	Yellow	Yellow
17	Northbrooks house and grounds	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Yellow	Yellow	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
170	Land between Tithlands and Water Lane	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Yellow	Red	Green	Yellow	Green	Yellow	Green	Green
173	Land east of Harlow Business Centre	Yellow	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Red	Green	Yellow	Green
174	Jean McAlpine park	Green	Yellow	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Yellow	Red	Yellow	Yellow	Green	Yellow	Yellow	Yellow
175	Land at Junction Parkway/Roydon Rd.	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Yellow
176	Playing field west of Foldcroft south of Canons Brook Club House	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Yellow	Yellow	Yellow	Red	Green	Green	Green	Yellow	Yellow	Yellow
177	Land south of 89-94 Canons Gate	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Green	Yellow	Yellow	Red	Green	Green	Green	Yellow	Yellow	Yellow

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
178	Ram Gorse Playing field	Yellow	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Yellow	Red	Yellow	Green	Green	Yellow	Green	Green
179	Land around Roydon Lea Farm	Yellow	Yellow	Red	Yellow	Green	Yellow	Green	Green	Green	Yellow	Yellow	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow
18	North of Fern Hill Lane Caravan Park	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Yellow	Yellow	Green	Red	Yellow	Yellow	Yellow
180	Katherines School	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Green	Red	Red	Green	Green	Green	Yellow	Yellow	Yellow
181	Milwards	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red	Green	Yellow	Yellow	Yellow
182	Kingsmoor	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green	Red	Yellow	Green	Green	Yellow	Yellow	Green	Red	Green	Yellow	Yellow	Yellow
183	Stewards	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green
184	Moorfields	Green	Green	Red	Red	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Green
185	Longwood	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
186	Commonside	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow
187	Latton Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
188	Potter St.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
189	Pear Tree Mead	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Yellow	Green	Yellow	Green	Yellow	Yellow	Yellow

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
19	Rear garden 1 Churchgate St.	Green	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	Green	Green
190	Henry Moore	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Red	Yellow	Red	Red	Yellow	Red	Green	Yellow	Yellow	Green
191	Church Langley School	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Green	Green	Red	Green	Yellow	Green	Yellow	Yellow	Yellow
192	Purford Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
193	William Martin	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Green	Green	Yellow	Green	Green
194	Harlow Fields	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
195	Passmores	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow
196	Abbotsweld	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
197	St. Lukes	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Yellow	Green	Yellow	Yellow	Green	Green	Green	Yellow	Green	Green
198	Jerounds	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
199	Hare St. Community	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Green	Green	Yellow	Green	Green	Yellow	Green	Yellow	Yellow	Yellow
2	6 Broomfield	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Yellow	Yellow	Yellow	Red	Yellow	Yellow	Green	Red	Yellow	Yellow	Yellow
200	The Downs	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Yellow	Yellow	Red	Red	Yellow	Yellow	Red	Yellow	Yellow	Yellow

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
201	The Spinney	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Red	Green	Yellow	Red	Yellow	Yellow	Red	Yellow	Yellow	Yellow
202	Mark Hall	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Yellow	Red	Yellow	Yellow	Yellow	Green	Yellow	Green	Green
203	St Nicholas School	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow
204	Churchgate Primary School	Green	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Red	Red	Red	Red	Yellow	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
205	Harlowbury	Green	Green	Green	Green	Green	Green	Red	Green	Red	Green	Red	Red	Yellow	Red	Green	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
206	Fawbert and Barnard School	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Red	Green	Yellow	Green	Yellow	Green	Green	Yellow	Green	Green
207	Tanys Dell School	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Green	Green
208	St. Albans School	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Yellow	Yellow
209	Burnt Mill School	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Green	Green
21	Corner Gilden Way/Churchgate St.	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	Green	Yellow
210	St Marks School	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Green	Red	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
211	Broadfields	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
212	Little Parndon	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Green	Red	Yellow	Yellow	Green	Yellow	Yellow	Yellow

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
213	Town Park - west of Spurriers																							
214	Town Park - east of School Lane																							
215	Town Park - northwest of Jim Desormeaux Bungalows																							
216	Town Park - north of Edinburgh Way																							
217	Allotment - Felmongers																							
218	Allotment- Fullers Mead																							
219	Allotment - Commonfields																							
220	Allotment- Tanys Dell																							
221	Allotment - Glebelands																							
222	Allotment - Canons Brook																							
223	Allotment - Canons Gate																							
224	Allotment - Chippingfield																							
225	Allotment - The Dashes																							

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
226	Allotment - Foldcroft	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Yellow	Red	Green	Green	Green	Yellow	Yellow	Yellow
227	Allotment - Izzards	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Red	Green	Red	Yellow	Yellow	Red	Yellow	Green	Green	Yellow	Yellow	Yellow
228	Allotment - Linford End	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Red	Green	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
229	Allotment - Long Ley	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Yellow	Red	Yellow	Red	Red	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
23	Former Scout Hut Elderfield	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Yellow	Red	Yellow	Yellow	Green	Green	Yellow	Green	Yellow	Yellow	Yellow
230	Allotment - Manor Hatch	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow	Green	Green
231	Allotment - Rushes Mead	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Red	Green	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
232	Allotment - Stackfield	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow
233	Allotment - Sylvesters	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Red	Green	Green	Green	Yellow	Yellow	Yellow
234	Allotment - The Oxleys	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
235	Allotment - Upper Stonyfield	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
236	Allotment - Vicarage Wood	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Green	Red	Yellow	Red	Green	Green	Green	Yellow	Yellow	Yellow
237	Allotment - Greygoose Park 1	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow	Yellow	Yellow

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
238	Allotment - Greygoose Park 2																							
239	Gardens to the rear of 161-173,45a-63,101-107 Fullers Mead																							
24	Former Nursery South of Gilden Way																							
240	Allotment - Willowfield																							
242	Land north of Gravelpit Springs and Latton Farm																							
243	Land east of 62-68 Herons Wood & south 49-50 Herons Wood																							
244	Land to the rear of Queens Head PH Churchgate St.																							
246	Gardens to the rear of 46-52 Collins Meadow																							
247	Land east of Goldings Farm																							
248	2-40 Dudley Terrace																							
249	Burnside Terrace																							
25	Former Scout Hut Pytt Field																							
250	Land east of 47-53 Jerounds																							

1043

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
252	Land and gardens 7-10 Kingsmoor Rd.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
253	Land east of Larkswood	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
254	Land north of 5 & 14 Morningtons	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Red	Yellow	Green	Green	Yellow	Yellow	Green	Red	Green	Yellow	Yellow	Yellow
255	Land north of Little Pynchons and Pear Tree Mead	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow
257	Playground south of 145-150 Little Brays	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
258	Land west of Goldings Farm	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Yellow	Red	Yellow	Green	Yellow	Green	Yellow	Green	Green
260	Land at junction Kingsmoor Rd/Southern Way	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
261	Playing Field east of Latton Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green
262	Allotment Riddings lane	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
263	Play area west of the Hill	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Yellow	Red	Yellow	Red	Red	Yellow	Red	Green	Red	Red	Yellow	Yellow	Yellow
264	Playground west of Stilecroft	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
265	Land off Three Horseshoes Rd.	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow
266	Sherards House and adjacent land	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow

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Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
267	Land southwest of 120 Churchfield	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Red	Yellow	Red	Red	Yellow	Green	Green	Yellow	Yellow	Yellow
268	Rear gardens of 19-24 Cock Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
269	Crabbe Farm	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Green	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Green
27	Manor Hatch	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Red	Green	Yellow	Green	Green	Yellow	Yellow	Yellow
270	Land to rear of 42-59 Old Rd.	Green	Green	Green	Green	Green	Green	Red	Green	Red	Green	Red	Red	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
271	Land west 21-32 Hawkenbury	Yellow	Green	Green	Red	Red	Yellow	Green	Green	Green	Green	Yellow	Red	Red	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow	Green	Green
272	Hillside Potter St.	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green
273	Land between 20 & 54 Orchard Croft	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Yellow	Yellow	Yellow	Red	Yellow	Yellow	Green	Yellow	Yellow	Yellow
274	Land between Paringdon Rd.& Parndon Wood Rd.	Green	Green	Red	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Red	Red	Green	Yellow	Red	Green	Green	Red	Green	Yellow	Green	Green
275	Land to rear of The Friars	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
277	Gateway Scheme (was Harlow Sports Centre)	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Yellow	Yellow	Red	Green	Yellow	Green	Yellow	Yellow	Yellow
279	Former Harlow Swimming Pool	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Red	Yellow	Yellow	Green	Yellow	Green	Green	Green	Yellow	Green	Green
28	Land off Manor Hatch Close	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow

1045

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
280	Marshgate Farm	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Green	Yellow	Yellow
283	Adams House The High	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Red	Red	Yellow	Red	Yellow	Yellow	Green	Yellow	Green	Green
284	1 & 1a Walfords Close	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Yellow	Red	Green	Red	Green	Green	Green	Yellow	Green	Yellow	Yellow	Green	Green
285	Land south of Mulberry Green Gardens	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Red	Yellow	Red	Yellow	Yellow	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
286	Block bounded by Broad Walk/East Walk/Terminus St.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Red	Red	Red	Red	Yellow	Yellow	Green	Yellow	Yellow	Yellow
287	Westgate House and MS carpark	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow
288	Land at junction of Cambridge Rd./Old Rd.	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Red	Green	Yellow	Yellow	Yellow
289	Land at junction Southern Way/Abercrombie Way	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Yellow	Yellow	Green	Green	Green	Yellow	Green	Yellow	Yellow	Green
29	East of Lower Meadow South of Radburn Close	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Red	Yellow	Green	Green	Yellow	Green	Yellow
290	Land at Markhall Wood west of Pennymead	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Red	Red	Green	Red	Red	Red	Green	Yellow	Green	Yellow	Green	Green
292	Land north of Jocelyns off Station Rd.	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Red	Green	Red	Yellow	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Yellow
293	Land between Athena Estate (Edinburgh Way) and A414	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Yellow	Yellow
294	Land between Hull Grove and Archers	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Yellow	Yellow	Yellow	Green	Red	Green	Yellow	Yellow	Yellow

1046

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
296	Land to the rear of Cotswold Mulberry Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Red	Red	Yellow	Red	Green	Yellow	Green	Yellow	Green	Yellow	Green	Green	Green
297	Playground adjacent to Partridge Day Centre (Barn Mead)	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
298	Garden to rear of Tye Cottage (Tye Green Village)	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Red	Green	Red	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Yellow	Yellow
299	Garage block between 63 & 86 Primrose Field	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Red	Green	Red	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Yellow	Yellow
3	Bali Hai - off Roydon Rd.	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Yellow
300	Staple Tye	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Yellow	Yellow
301	Coppice Hatch and garages	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Yellow	Green	Green	Yellow	Yellow	Yellow
302	Allotments west of Dudley Terrace	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
303	Club House and car park south of Clifton Hatch	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Green	Green	Red	Yellow	Green	Yellow	Green	Green	Green	Green
304	Garages and land north of Great Leylands south of Highfield	Green	Green	Green	Red	Green	Green	Yellow	Green	Green	Green	Yellow	Red	Yellow	Green	Yellow	Red	Green	Green	Green	Green	Yellow	Green	Yellow
305	Brays Mead allotments	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Red	Yellow	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
306	Allotments east of Stewards	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Yellow	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green
307	Garage blocks north of 71 & 91 Glebelands	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Red	Yellow	Yellow	Yellow	Red	Yellow	Green	Green	Red	Yellow	Yellow	Yellow

1047

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
308	Former car showroom junction Howard Way/First Ave																							
309	Allotments between Parsonage Leys and Arkwrights																							
310	Allotments north of Ram Gorse																							
311	Land north of Ram Gorse																							
312	Caravan Site Flex Meadow																							
313	Allotment off Mill Lane																							
314	Pypers Hatch																							
315	Telephone Exchange Fifth Ave.																							
316	Aneurin Bevan Centre																							
317	Garage block north of Gothic Hse. London Rd.																							
318	Former garage site north of Churchfield																							
319	Allotments junction Commonsides Rd./Fern Hill Lane																							
32	Bush Fair/Sherwood House and Car Parks																							

1048

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
320	Allotments north of Stile Croft	Green										Green	Red	Green	Yellow	Green	Yellow	Green				Yellow	Yellow	Yellow
321	Playground off Mill Lane	Green										Red	Red	Red	Red	Yellow	Red	Yellow	Green			Yellow	Yellow	Yellow
322	Allotment off Mill Lane	Green						Yellow				Red	Red	Red	Red	Yellow	Red	Yellow	Green			Yellow	Yellow	Yellow
323	Garage block between 30 & 31 Long Ley	Green										Red	Red	Red	Green	Yellow	Green	Red	Green	Yellow		Yellow	Yellow	Yellow
324	Garage block north of Westfield	Green										Red	Red	Red	Yellow	Green	Red	Green		Yellow		Yellow	Yellow	Yellow
325	Scout hut junction School Lane/First Ave.	Green					Yellow	Red			Yellow	Red	Yellow	Yellow	Yellow	Green	Yellow	Green				Yellow	Green	Green
326	Garage Block south of Great Plumtree	Green						Red				Yellow	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Green			Yellow	Yellow	Yellow
328	Land off Old Hall Rise Church Langley	Green										Red	Red	Red	Red	Red	Red	Red	Green	Red		Yellow	Yellow	Yellow
329	Garage block west of 287-290 Ladysht	Green			Red		Yellow					Red	Red	Yellow	Green	Red	Yellow	Red	Green			Yellow	Green	Green
330	Garage block east of 190-194 Pittmans Field	Green			Red		Yellow					Red	Red	Green	Yellow	Yellow	Green	Yellow	Yellow			Yellow	Yellow	Yellow
331	Garage block adjacent to Pennymead Tower	Green										Red	Red	Yellow	Green	Red	Yellow	Red	Green			Yellow	Yellow	Yellow
332	Garage block south of Sewell Harris Close	Green			Red		Yellow					Red	Red	Green	Yellow	Green	Red	Green				Yellow	Green	Green
333	Garage block south of 48-53 Rushes Mead	Green										Red	Red	Yellow	Red	Green	Red	Yellow	Yellow			Yellow	Yellow	Yellow

1049

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
334	Garage block adjacent to Tendring Mews																							
335	Wayside Farm and adjacent land																							
337	Garage block north of 45-50 Pear Tree Mead																							
338	Electricity sub stations south of Barn Mead																							
339	Gardens to the rear of 28-38 Mulberry Green																							
34	Garages at rear of 55-59 Hook Field																							
340	Land north of Rye Hill reservoir																							
341	Mobility House (The High)																							
342	Car showroom Potter Street																							
344	Land at Yorkes Tye Green Village																							
345	Care Centre east of Barn Mead																							
346	Rear gardens of 247-250 Felmongers																							
347	Land associated with Hestor House and Hester Mews																							

1050

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
348	Allotments north of 1-6 Carters Mead																							
349	Road Safety training ground																							
35	Land to the East of Harlow Fields School																							
350	Car park Kitson Way																							
351	Post Office and yard Post Office Road																							
352	Maunds Hatch and Hall																							
353	Land north of former Nortel Laboratories																							
354	Skins Farm leisure plots																							
355	Land to the East of East End farm																							
356	land East of Broomfield																							
357	Land South of Parkhill																							
359	Burgoyne Hatch																							
36	Garage blocks adjacent to Nicholls Tower																							

1051

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
360	Cawley Hatch	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Red	Red	Yellow	Red	Red	Green	Yellow	Green	Green
361	Sumners Hatch	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Yellow	Green	Green	Yellow	Green	Green
362	Ward Hatch	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow
363	Mill Hatch	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Red	Red	Red	Red	Yellow	Green	Green	Yellow	Yellow
364	Land to the North of Milwards	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Green	Yellow	Green	Green
365	Land East of Staple Tye	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green
366	Land North of Woodhill	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Green	Green
367	Lutheran Church	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green
368	Land to the north of Nicholsfield Pavilion	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Green	Green	Green	Green	Yellow	Green	Green
37	Garage blocks adjacent to Moore Tower	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Yellow	Red	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow
370	Allotment to the South of Little Brays	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
371	Harolds Grove	Green	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Yellow
372	Norman Booth Recreation Centre	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Yellow	Red	Yellow	Yellow	Green	Green	Green	Green	Yellow	Green	Yellow

1052

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
373	High Street Old Harlow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Yellow	Red	Green	Red	Green	Green	Green	Green	Green	Green	Yellow	Green	Green
374	Aylets Field; The Briars; Copshall Close; - Known as Priority Estates	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green
375	Northbrooks Regeneration area (excuding Northbrooks House)	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Red	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green
376	Edinburgh Gate	Green	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Green	Yellow	Yellow
38	Elm Hatch and Public House	Green	Green	Green	Red	Green	Green	Red	Green	Yellow	Yellow	Red	Red	Red	Green	Yellow	Red	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow
39	Stewards Farm	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green
41	Council Depot adjacent to Willowfield Tower	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
42	Land adjacent to Willowfield Tower plus garage block	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Yellow
43	Sherards Hatch and adjacent land	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Yellow	Yellow	Yellow	Green	Red	Green	Yellow	Yellow	Yellow
44	Kingsmoor House and gardens	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red	Green	Yellow	Yellow	Yellow
45	Pollard Hatch plus garages and adjacent land	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Green	Green	Red	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
46	Katherines Hatch	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Green	Red	Red	Green	Green	Green	Yellow	Green	Green
47	The Stow	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Yellow	Red	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Yellow	Yellow	Yellow

1053

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
48	Service bays rear of The Stow																							
49	Common room adjacent to Glebelands playground																							
5	SW Harlow (land in Harlow)																							
50	Mark Hall barn and adjacent land																							
51	Ladyshot Pavilion																							
52	Garages east of 99-102 Greenhills																							
53	Garages south of 158-159 Halling Hill																							
54	Former garage and allotments west of 1 Felmongers																							
55	Garages 88-96 Collins Meadow																							
56	Garages and adjacent land to the rear of 83-87 Halling Hill																							
57	Former garages south of 151 Milwards																							
58	Garages to rear of 62 Stackfield																							
59	Garages and land to the rear of 55-69 The Hill																							

1054

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
6	Harlow North (land in Harlow)	Green	Yellow	Red	Red	Red	Yellow	Green	Green	Red	Red	Green	Yellow	Red	Red	Red	Yellow	Red	Green	Yellow	Green	Green	Green	Green
60	Garages to the rear of 258 & 259 Church Leys	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Yellow	Green	Green	Yellow	Yellow	Yellow
61	Garages to the rear of 122 & 131 Pennymead	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Red	Yellow	Red	Green	Yellow	Green	Yellow	Green	Green
62	Garages and land to the rear of 11-18 Great Leylands	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Yellow	Yellow
63	Garages to the rear of 49-53 The Readings	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Yellow	Yellow	Green	Yellow	Yellow	Red	Yellow	Yellow	Yellow
64	Garages to the rear of 170-183 Wharley Hook	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Yellow	Yellow
65	Garage blocks to the rear of 1-6 Harefield	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Green	Red	Yellow	Red	Green	Green	Green	Yellow	Yellow	Yellow
66	Garage block to the east of 165 Orchard Croft	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Yellow	Green	Green	Red	Green	Yellow	Green	Yellow	Green	Green
67	Garage Block to the rear of 65 to 73 Chippingfield	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Yellow	Yellow	Yellow
68	Slacksbury Hatch and associated garages	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow
69	Blackbush Spring Common Room	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Yellow	Yellow
70	Garage blocks between 1 and 36 Arkwrights	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Yellow	Yellow
72	Lister House, Staple Tye Mews, Staple Tye Depot, and The Gateway Nursery	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green

1055

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PROW)	Cycle Route
75	Collins Meadow Playing Fields																							
77	Playing field off Paringdon Rd.																							
79	Recreation ground Shawbridge																							
8	Peldon Lane																							
80	The Stow playing field																							
81	The Dashes playing field																							
82	Long Ley playing field																							
84	Land to the north of Roydon Road																							
85	Canons Brook Golf Course (south)																							
86	Canons Brook Golf Course (north)																							
87	Land adjacent to Fairview and Hillview off Well Lane																							
89	Post Office Road car park																							
9	PAH																							

1056

Site Ref	Location	Flood zone	SAC/ SPA /Ramsar	SSSI	Local Wildlife Site	Local Nature Reserve	Priority Habitat	Conservation area	Historic P or G	Scheduled M	Listed building	Employment area	Town centre	Neighbourhood Centre	Shopping area	School	GP/health centre	Sports and Health Facility	Playground	Allotment	Bus stop	Train station	Public Rights of Way (PRoW)	Cycle Route
90	Market Square and linking footpaths																							
93	Faircroft/Little Bays Station Rd. (Vince Dunne Mews)																							
94	Car park and garage block Wayre St.																							
95	The Latton Bush Centre																							
97	Former Council offices off Maddox Rd.																							
99	Garage block and land west of Dashes Playing Field																							

Appendix IV: SA of reasonable alternatives

Introduction

As explained within 'Part 1' above, a focus of work has been on the development and appraisal of spatial strategy alternatives, with a view to informing determination of the preferred strategy. The alternatives are as follows (NB. significantly differentiating figures from Option 1a are highlighted in red)

Appraisal methodology

For each of the options, the assessment examines **likely significant effects** on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. A star is used to highlight the option or options that are preferred from an SA perspective.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.¹⁰⁶ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Epping Forest District Local Plan).

¹⁰⁶ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Air Quality

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	1	2	3
Significant effect?	No	No	?

Air pollution in Harlow is considered to be generally low, with monitoring concluding that there are no areas where the air quality has led to the designation of an Air Quality Management Area (AQMA).¹⁰⁷ While the trend across all monitored sites in the District indicates that air quality is improving, it is recognised that traffic emissions are the most significant source of air pollution in the District.¹⁰⁸

The road network around Harlow carries large volumes of traffic; the most notable area of congestion being on the routes and links to Junction 7 of the M11, but also the A414. Transport Modelling carried out as part of the Strategic Spatial Options Study for the West Essex and East Hertfordshire HMA indicated that a 35-40% increase in trips on the network by 2033 is to be expected, based on 14,000 new homes in and around Harlow (and 48,000 across the wider HMA).¹⁰⁹

In terms of the level of development that can be accommodated in and around Harlow, the transport modelling indicated that the preferred spatial strategy for the HMA can be delivered; provided that key mitigation measures are delivered during the Plan period. A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A), which will improve the flow of traffic east to west across the District and provide a catalyst for further development, promoting Harlow as a growth location along the M11 corridor.

Option A seeks to deliver the preferred approach agreed through the distribution of OAHN MoU (March 2017) for the HMA, so it is therefore concluded that it will not result in any significant negative effects on traffic and air quality. Options B and C propose increased density on eight brownfield sites and therefore an increased overall level of growth to be delivered during the life of the Plan. Option B would result in an increase of 804 dwellings and Option C an increase of 2,383 dwellings compared to Option A. While Option B is likely to have a greater impact on traffic compared to Option A, it is likely to be minimal and not of significance in terms of differentiating between them. The level of growth proposed through Option C is more likely to substantially increase the levels of traffic and therefore have a negative effect on air quality; however, this is uncertain as it is not clear if there is mitigation available that could reduce the significance of the effect and accommodate the additional traffic generated.

It should be noted that increased density is being proposed at sites that are in close proximity to the town centre, Hatches and sustainable transport corridor nodes. This should help to reduce the impacts on traffic levels given accessibility to services/ facilities, employment and sustainable transport modes. Option A performs better in terms of air quality as it proposes the level of growth agreed through the OAHN MoU and there is a commitment to deliver the necessary transport infrastructure through a separate MoU.

¹⁰⁷ Harlow District Council (2017) Air Quality Annual Status Report.

¹⁰⁸ Ibid.

¹⁰⁹ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

Biodiversity and green infrastructure

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	=	=	=
Significant effect?	No	No	No

It's important to note that there are no differences between the options in terms of the spatial distribution of development. The focus of the appraisal is therefore on the issue of increased density at certain brownfield sites and the resulting overall increase in level of growth for the District.

Increasing the density of development at eight of the brownfield allocations is not likely to result in any significant effects on biodiversity at those individual sites alone. The boundaries of the sites would not change as a result of increased density proposed under Options B and C. While it is recognised that brownfield sites can have biodiversity value there is no evidence to suggest that this is the case for any of the seven sites. A higher density of housing at these sites increases the likelihood that any existing open/ green space on them will be lost and will make the delivery of onsite multifunctional green infrastructure (GI) more difficult. Conversely, increasing the density of development can also provide an opportunity for increased Section 106 contributions. This could help deliver greater enhancements to biodiversity through additional provision of multifunctional green infrastructure (off site) or perhaps improved management of the Green Wedges and Fingers within the town. Given the lack of available land within Harlow delivering off site multifunctional GI could prove difficult.

As the density of development on these eight sites increases so does the overall level of growth for the District. While this is not likely to result in any direct impacts on designated or wider biodiversity, there is the potential for indirect effects through increased disturbance, which includes increased recreational activity. Considering the existing urban nature of the sites as well as future growth proposed through the Garden Town Communities surrounding Harlow it is unlikely that the increased level of growth proposed under Options B and C would result in a significant negative cumulative effect.

Overall, it is difficult to identify any significant differences between the options given uncertainties. Options B and C could provide greater Section 106 contributions and therefore opportunities for enhancement of existing GI compared to Option A. However, they could also result in less provision of on-site multifunctional GI on site and have a greater likelihood for indirect negative effects as a result of increased recreation.

Climate change (mitigation and adaptation)

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	1	2	3
Significant effect?	No	No	?

With regards to climate change mitigation, key issues relate to A) the need to capitalise upon opportunities to design-in low carbon infrastructure, and therefore reduce per capita related CO₂ emissions; and B) the need to reduce car dependency and distance travelled by private car, and therefore per capita transport related CO₂ emissions.

It is not clear at this stage if there are any significant differences between the options in terms of opportunities to design-in low carbon energy. Options B and in particular Option C could provide greater Section 106 contributions and therefore help to deliver enhanced provision of renewable or low carbon energy either on or off site. However, this is uncertain at this stage. There is no evidence to suggest that there are particular opportunities to deliver renewable or low carbon energy at any of the eight sites where a higher density is proposed.

With regards to climate change adaptation, a key issue is flood risk. None of the proposed sites are within an area of high flood risk and it is considered that there are no significant differences between the options in terms of this issue.

In terms of reducing reliance on the private vehicle all of the options propose development at the same sites, the majority of which have good access to sustainable transport modes and neighbourhood/local centres. Options B and C propose a higher density of housing at eight sites that are in close proximity to the town centre, Hatches and sustainable transport corridor nodes. Option B would result in an increase of 804 dwellings and Option C an increase of 2,383 dwellings compared to Option A. While Option B is likely to have a greater impact on traffic compared to Option A, it is likely to be minimal and not of significance in terms of differentiating between them. The level of growth proposed through Option C is more likely to substantially increase the levels of traffic and therefore have a negative effect in terms of greenhouse gas emission; however, this is uncertain as it is not clear if there is mitigation available that could reduce the significance of the effect and accommodate the additional traffic generated.

Community and wellbeing

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	=	=	=
Significant effect?	Yes	Yes	Yes

There are no differences between the options in terms of the spatial distribution of development. Options B and C propose a higher density of growth at eight brownfield sites that are in close proximity to the town centre, Hatches and a potential sustainable transport corridor node. As the level of growth increases at the eight brownfield sites due to higher densities, so does the potential for increased Section 106 contributions and subsequent improvements to community infrastructure and the public realm. At this stage there is a significant uncertainty around the level of improvements that could be delivered under Options B and C.

Increased density could result in a greater loss of any exiting green/open space at these eight sites; however, this is uncertain as the precise design, including height, and layout of development is not known. Increasing the density of development could also provide an opportunity for increased Section 106 contributions. This could help deliver greater enhancements to green/open space through additional provision of multifunctional green infrastructure (on or off site) or perhaps improved management of the existing Green Wedges and Fingers within the town. Conversely, a reduction in areas for community interaction and recreation on-site, such as open/green space, could have a negative effect on community integration and cohesion.

All of the options are likely to have a significant positive effect on this topic through the provision of housing and associated improvements to community infrastructure and the public realm. While Options B and C have the potential for benefits through increased contributions to community infrastructure and public realm improvements they could also result in less provision of open/green space on-site for less community interaction and recreation. On balance, it is difficult to identify any significant differences between the options given uncertainties.

Economy and employment

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	2	2	1
Significant effect?	No	No	No

There are no differences between the options in terms of the spatial distribution of development. Options B and C propose higher density development and therefore more growth at eight brownfield sites near to the town centre, District's Hatches as well as one potential sustainable transport corridor node. More housing growth in close proximity to these areas will help to support the regeneration and vitality of centres. Furthermore, Options B and C could result in a greater level of improvements to the public realm through increased Section 106 contributions making the centres more attractive to visitors. However, this is uncertain at this stage.

None of the options would result in any differences in terms of the amount or location of new employment land coming forward. Effects are more likely to be indirect through the regeneration of the built environment, public realm and increased population. On balance, it is considered that Option C could have a greater positive effect for the local economy through enhanced improvements to the public realm and increased visitor activity. The differences between Option A and B are less significant.

Historic environment

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	1	2	3
Significant effect?	No	No	?

It's important to note that there are no differences between the options in terms of the spatial distribution of development. The focus of the appraisal is therefore on the issue of increased density at seven brownfield sites and the resulting overall increase in level of growth for the District.

In terms of designated sites, the boundary of the Elm Hatch and public house site (HS2-14) falls just within the Netteswellbury Conservation Area and is in close proximity to a number of listed buildings. As the density of housing increases at this site so does the likelihood for a negative effect of significance on these designated heritage assets. It is assumed at this stage that the increased density proposed under Option B and in particular Option C could result in buildings that are higher than the current built form and therefore not in keeping with the character of the area. This could affect the setting of the designated heritage assets and the wider historic environment.

The Princess Alexandra Hospital site (HS2-1) contains a Scheduled Monument and is within 50m of two others, all Bowl barrows (burial mounds). The site also contains a listed building and there are a number more in close proximity. At this stage it is uncertain if the density of development proposed under Option B and C would result in development that is higher than the existing hospital buildings. Development provides an opportunity for the regeneration of this site, which could have a positive effect on the historic environment as long as the design, layout and density of development is sympathetic to the designated heritage assets and wider historic environment.

Density increases at the remaining brownfield sites are less likely to have a significant effect on the historic environment given their distance from designated heritage assets as well as the small scale of the sites/development. However, it is recognised that the historic environment encapsulates more than just designated heritage assets. On balance, it is considered unlikely that Options A or B would result in a significant negative effect on the historic environment. There is suitable mitigation available to reduce the residual effect to a minor negative. Mitigation is likely to be more difficult and/or expensive for the level of density proposed through Option C.

Housing

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	2	2	1
Significant effect?	Yes	Yes	Yes

All of the options provide sufficient development to help meet the identified housing needs for the District and deliver the additional housing requirement of 1,042 dwellings. As the density of development on certain PDL sites increases so does the overall level of growth for the District. As the overall level of growth increases so does the potential to deliver a greater number of affordable homes and help meet the significant needs identified for the District.¹¹⁰ It is not clear at this stage if the higher densities, particularly for the larger sites, would affect the percentage of affordable homes being delivered on-site and if so, where else they might be delivered.

Option C is likely to have a positive effect of greater significance compared to the other options on this topic as it would result in the delivery of an additional 2,383 dwellings compared to Option A and 1,578 compared to Option B. Potential drawbacks to Option C are that a higher density of development on some of the sites could make it more difficult to provide a sufficient mix of market and affordable housing, in particular family homes, but this is uncertain.

The additional growth proposed under Options B and C does offer more flexibility during the life of the Plan should any allocated sites not to come forward. However, the higher density proposed through Option C could affect the viability of these sites, through increased levels of infrastructure/ mitigation required.

All of the options have the potential for a significant positive effect by meeting the additional housing requirement. Option C is likely to have an enhanced positive effect as it proposes a higher level of overall growth, although there are questions over viability.

¹¹⁰ Opinion Research Services (July 2017) West Essex and East Hertfordshire Strategic Housing Market Assessment: Affordable Housing Update.

Land and waste

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	=	=	=
Significant effect?	No	No	No

It's important to note that there are no differences between the options in terms of the location of development. With this in mind, there is little to differentiate between the options in terms of the efficient use of land. All of the options are likely to have a positive effect on this topic as they seek to maximise the use of previously developed land. Higher density development at certain sites could reduce the amount of green/open space provided on them but this is uncertain and dependent on a number of factors.

Options B and C will generate more household waste as a result of the increased number of new homes compared to Option A. However, there is no evidence to suggest that would be a significant issue and that effective waste management could not be provided.

Landscape

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	1	2	3
Significant effect?	No	No	?

There are no differences between the options in terms of the spatial distribution of development. The focus of the appraisal is therefore on the issue of increased density at eight brownfield sites and the resulting overall increase in level of growth for the District.

Given the small scale/ capacity of the majority of brownfield sites where higher densities are proposed, it is unlikely that there would be a significant effect on townscape as a result of development alone at those sites. The Princess Alexandra Hospital (HS2-1) is the largest site and it is assumed that the density of development proposed, in particular through Option C, would result in a built form that is higher than the existing hospital buildings but this is uncertain.

Increased density at certain brownfield sites could help to further support regeneration, allowing for greater contributions and therefore improvements to the public realm and exiting built environment. It could also result in a reduction in the level of open/green space on-site, which important to the character of the town.

Ultimately, the nature and significance of the effect on townscape is dependent on the precise design and layout of development. On balance, it is considered that Option C is more likely to result in a negative effect of significance on townscape and there is a greater level of uncertainty around the ability to provide suitable mitigation.

Transport

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	1	2	3
Significant effect?	No	No	?

The road network around Harlow carries large volumes of traffic; the most notable area of congestion being on the routes and links to Junction 7 of the M11, but also the A414. Transport Modelling carried out as part of the Strategic Spatial Options Study for the West Essex and East Hertfordshire HMA indicated that a 35-40% increase in trips on the network by 2033 is to be expected, based on 14,000 new homes in and around Harlow (and 48,000 across the wider HMA).¹¹¹

In terms of the level of development that can be accommodated in and around Harlow, the transport modelling indicated that the preferred spatial strategy for the HMA can be delivered; provided that key mitigation measures are delivered during the Plan period. A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A), which will improve the flow of traffic east to west across the District and provide a catalyst for further development, promoting Harlow as a growth location along the M11 corridor.

Option A seeks to deliver the preferred approach agreed through the distribution of OAHN MoU (March 2017) for the HMA, so it is therefore concluded that it will not result in a significant negative effects in terms of traffic. Options B and C propose increased density on eight brownfield sites and therefore an increased overall level of growth to be delivered during the life of the Plan. Option B would result in an increase of 804 dwellings and Option C an increase of 2,383 dwellings compared to Option A. While Option B is likely to have a greater impact on traffic compared to Option A, it is likely to be minimal and not of significance in terms of differentiating between them. The level of growth proposed through Option C is more likely to substantially increase the levels of traffic; however, this is uncertain.

Higher density growth is proposed at sites that are close to the town centre, local centres (Hatches) as well as sustainable transport corridor nodes. This is positive in terms of transport and movement as development around these areas will have excellent access to services/facilities as well as sustainable transport modes. This will help to reduce reliance on the private vehicle and encourage a modal shift.

Taking the above into account it is predicted that Options A and B would not result in a significant negative effect on this topic. There is a greater level of uncertainty for Option C as it is not clear at this stage if improvements to highway infrastructure could be delivered.

¹¹¹ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

Water

	Option A Preferred Approach	Option B Moderate density on certain PDL sites	Option C High density on certain PDL sites
Rank of preference	=	=	=
Significant effect?	No	No	No

As the density of development on certain PDL sites increases so does the overall level of growth for the District. This has the potential to increase pressure on water resources as well as Waste Water Treatment Works (WwTWs).

The District falls within Affinity Water's supply area. Water companies in England are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies are currently in the process of updating their WRMPs to take account of predicted growth and ensure that there are schemes in place to meet future demands. As the level of growth proposed under the options increases so does the pressure on water resources. However, given the legal requirements in place for WRMPs, it is considered that there are no significant differences between the options in terms of effects on water resources.¹¹²

Thames Water is responsible for waste water in Harlow and the surrounding area, ensuring infrastructure is in place to accommodate anticipated growth. Thames Water position statement (2017) indicates that capacity at the Rye Meads Sewage Treatment Works (STW) is expected up to 2036; however, upgrades may be required in sludge and storm streams. Further network modelling and growth review is being undertaken by Thames Water to understand sewer capacity in the area before outlining further intervention solutions.¹¹³

Harlow Council commissioned a Water Cycle Study Phase 1 Update and the Draft Report did not identify any issues which require further assessment by a Phase 2 study.¹¹⁴

There are no significant differences between the options and they are all predicted to have a neutral effect in relation to the water environment.

¹¹² Affinity Water (2014) Water Resource Management Plan.

¹¹³ Thames Water (2017) Greater Harlow Position Statement.

¹¹⁴ Harlow Council (April 2018) Water Cycle Study Update Draft Report. Prepared by JBA Consulting.

Habitats Regulations Assessment of Harlow Local Development Plan

Draft Pre-Submission Strategic and Development Management
Policies February 2018

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Quality information

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1. Introduction

Background to the Project

- 1.1 AECOM has been appointed by Harlow District Council to assist the Council in undertaking a Habitats Regulations Assessment of its Local Development Plan Draft Pre-Submission Strategic Sites and Development Management Policies (December 2017) (hereafter referred to as the 'Plan', 'Local Plan' or 'LDP'). The objective of this assessment is to identify any aspects of the Plan that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.2 An assessment of housing need across the West Essex and East Herts Housing Market Area (HMA) has been conducted, which has been used as the basis for developing the LDP. The HMA covers Harlow, Epping Forest, East Hertfordshire and Uttlesford District Councils. The HMA developed a series of different Options for quantity and distribution of housing in each of the authority boundaries, focussed on growth within the broad Harlow area. To underpin this, traffic modelling and an air quality impact assessment regarding impacts on Lee Valley SPA and Ramsar site and Epping Forest SAC was undertaken of each of the Options in 2016. Data from that analysis is used to inform the air quality section of this HRA as the best data currently available. However, given the quantum and location of growth in Harlow (and adjacent Epping Forest District) has now been confirmed beyond the level of detail available in 2016, this modelling (and thus this HRA) is programmed to be updated. The intention is for this to take place prior to commencement of the Examination of the Harlow Local Plan. Following that, the relevant aspects of this HRA will also be updated.

Current Legislation

- 1.3 The need for Appropriate Assessment is set out within Article 6 of the EC Habitats Directive 1992¹, and interpreted into British law by the Conservation of Habitats and Species Regulations 2017². The ultimate aim of the Directive is to "*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.4 The Habitats Directive applies 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.
- 1.5 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:

¹ <http://jncc.defra.gov.uk/page-1374> (accessed 21/12/2017)

² <https://www.legislation.gov.uk/ukksi/2017/1012/contents/made> [accessed 21/12/2017]

Box 1: The legislative basis for Appropriate Assessment

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.”

Conservation of Habitats and Species Regulations 2017

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”.

- 1.6 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

- 1.7 There is no pre-defined guidance that dictates the physical scope of a HRA of a 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:
- 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).
- 1.8 Briefly defined, pathways are routes by which a change in activity provided within a Local Plan document can lead to an effect upon an internationally designated site. Guidance from the former Department of Communities and Local Government³ 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*’ (CLG, 2006, p.6). More recently, the Court of Appeal⁴ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be ‘*achieved in practice*’ to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy document)⁵. In this case the High Court ruled that for ‘*a multistage process, so long as there is sufficient*

³ 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

⁴ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁵ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

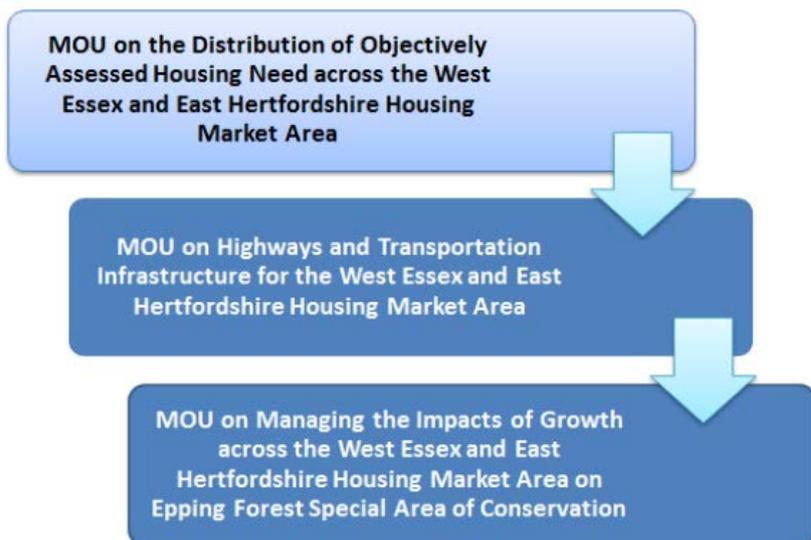
information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of the Habitats Regulations’.

- 1.9 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 LDP could provide linking impact pathways that could impact the integrity of those European sites. These are:
- Epping Forest SAC;
 - Lee Valley SPA and Ramsar site; and
 - Wormley-Hoddesdonpark Woods SAC.
- 1.10 The reasons for designation of these sites, together with current trends in habitat quality and pressures on the sites, are indicated in Appendix A. All the European sites are illustrated in **Appendix B, Figure B1**.
- 1.11 In order to fully inform the screening process, a number of relevant studies have been consulted to determine likely significant effects that could arise from the LDP. These include:
- Final Water Resources Management Plan, 2015-2040. Affinity Water. June 2014
 - Rye Meads Water Cycle Study (Hyder Consultancy, October 2009)
 - Local Plans (and HRAs) for Epping Forest District, East Hertfordshire District, Chelmsford, Brentwood, Havering, Redbridge, Waltham Forest, Enfield and Broxbourne District, and Uttlesford District.
 - Recreational activity, tourism and European site recreational catchment data – where available have used data that exists for individual European sites but in many cases these do not exist. In such circumstances have used appropriate proxy from other European sites designated for similar features and in similar settings;
 - The UK Air Pollution Information System (www.apis.ac.uk); and
 - Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk)

Memoranda of Understanding

- 1.12 Harlow Council is a signatory to three Memoranda of Understanding (MoU). These MoU's have been prepared to support development within Uttlesford District, Epping Forest District, East Hertfordshire District and Harlow (also signed by Essex County Council, Hertfordshire County Council the City of London and relevant authorities including Natural England and Highways England). These are:
- Memorandum of Understanding on managing the impacts of growth within the West Essex / East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation (draft September 2016);
 - Memorandum of Understanding on distribution of Objectively Assessed Housing. Need across the West Essex/East Hertfordshire; and
 - Memorandum of Understanding on highways and Transport Infrastructure for the West Essex/ East Hertfordshire Housing Market Area.
- 1.13 These three MoU documents are interrelated as shown in Figure 1.

Figure 1: Inter-related Memorandum of Understanding⁶



1.14 The MoU documents will be referred to within this HRA report.

This Report

1.15 Chapter 2 of this report explains the process by which the HRA has been carried out. Chapter 3 explores the relevant pathways of impact. Chapter 4 contains an initial sift of Plan policies to determine which present potential scope for impacts on European sites. Chapters 5 to 8 then provide more detailed screening (likely significant effects assessment) of each impact pathway. An assessment of the Plan in respect of each European site is then carried out mitigation strategies are proposed where necessary⁷. The key findings are summarised in Chapter 9 which provides overall conclusions including a summary of recommendations.

⁶ Taken from the MoU's

⁷ Legal precedent confirms that it is perfectly acceptable to reference mitigation measures at the screening stage of HRA, if that is the stage at which they can be identified.

2. Methodology

Introduction

- 2.1 The HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist⁸. The former Department of Communities and Local Government (DCLG) released a consultation paper on the Appropriate Assessment of Plans in 2006⁹. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance¹⁰ as has the RSPB¹¹. Both of these have been referred to in undertaking this HRA.
- 2.2 **Figure 2** below outlines the stages of HRA according to current draft DCLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

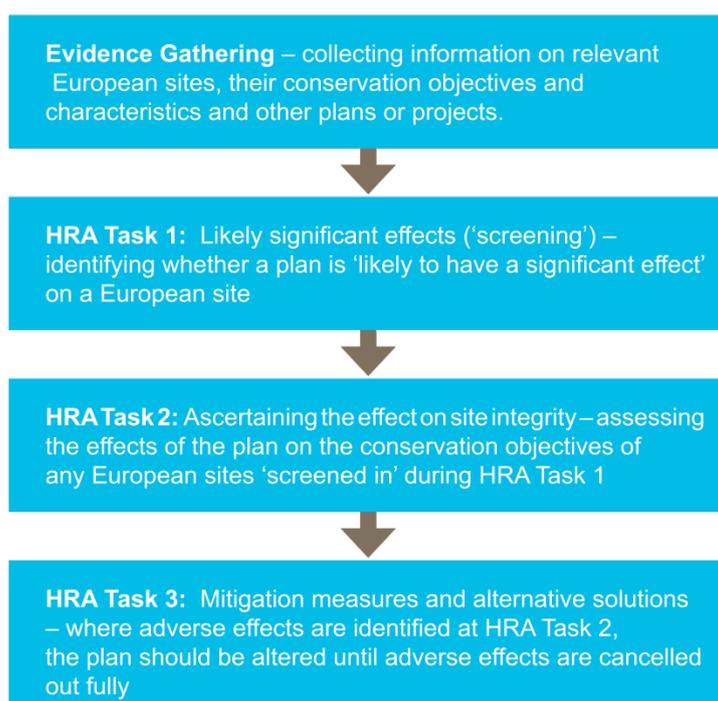


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source CLG, 2006¹².

HRA Task 1: Likely Significant Effects (LSE)

- 2.3 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:

“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”

⁸ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁹ 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

¹⁰ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

¹¹ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007). *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

¹² CLG (2006) Planning for the Protection of European Sites, Consultation Paper.

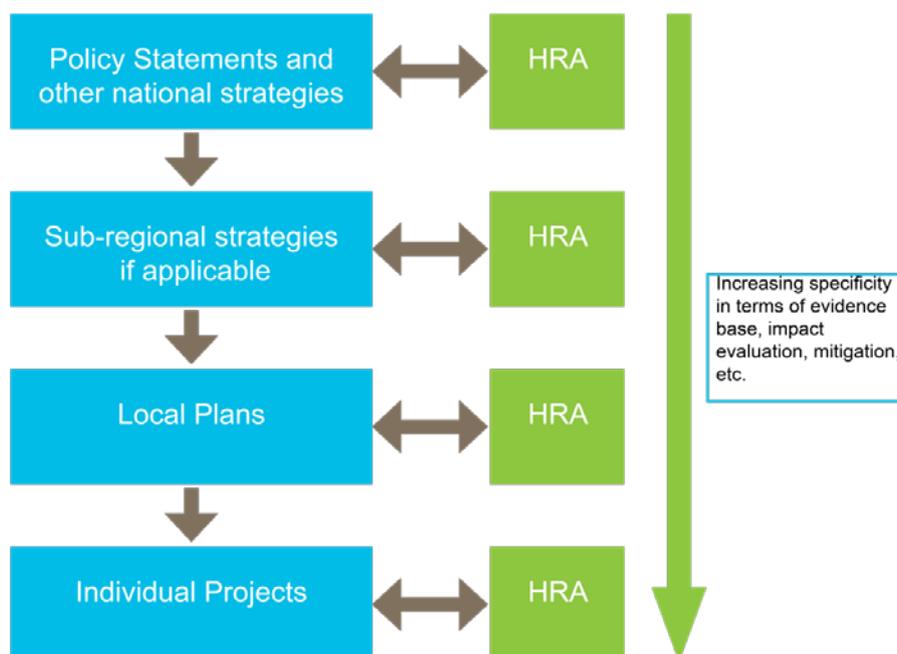
http://webarchive.nationalarchives.gov.uk/20061101113831/http://www.communities.gov.uk/staging/embedded_object.asp?id=1502353

- 2.4 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.
- 2.5 Case law has established that it is legally permissible to take mitigation measures into account in drawing a conclusion on likely significant effects. Therefore, where such measures are already included in the Local Plan or related initiatives, these have been taken into account in determining whether an adequate policy framework is in place to ensure no effects will result.

HRA Task 2: Appropriate Assessment (AA)

- 2.6 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.
- 2.7 In this case, Natural England's response to the HRAs of the Local Plan's for surrounding authorities such as Epping Forest District indicated that they would prefer the air quality analysis at Epping Forest SAC to be classified as 'appropriate assessment'. That approach has therefore been followed in this report.
- 2.8 In making judgments regarding mitigation, it is important to note that mitigation measures can be tiered. This ‘tiering’ of assessment is summarised in **Box 2**.

Box 2: Tiering in HRA of Land Use Plans



Task 3: Avoidance & Mitigation

- 2.9 Where necessary, measures will be recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that Plan documents needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.10 In evaluating significance, AECOM have relied on our professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.
- 2.11 When discussing ‘mitigation’ for a Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since Local Plan document is a high-level policy document.

Principal Other Plans and Projects That May Act ‘In Combination’

- 2.12 It is neither practical nor necessary to assess the ‘in combination’ effects of the Plan within the context of all other plans of neighbouring authorities within Essex and Hertfordshire. In practice therefore, in combination assessment is of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing and commercial/industrial allocations proposed for other relevant Essex and Hertfordshire authorities over the lifetime of the District Plan, particularly East Hertfordshire, Epping Forest and Uttlesford authorities.

Table 1: Housing levels to be delivered across Epping Forest District and surrounding authorities, provided for context.

Local Authority	Total housing provided
Uttlesford	These three authorities with Harlow are working together as part of a HMA. Where impacts in combination such as air quality impacts are considered, these assessments will be based on the level of development provided within the HMA.
East Hertfordshire	
Epping Forest	
Broxbourne	7,718 (2016-2033) ¹³
Chelmsford	18,515 (to 2036) ¹⁴
Brentwood	7,240 (to 2033) ¹⁵
Havering	17,550 (2016 - 2031) ¹⁶
Redbridge	16,845 (2015-2030) ¹⁷
Waltham Forest	10,320 (2012 - 2026) ¹⁸
Enfield	13,480 (to 2030) ¹⁹

¹³ https://www.broxbourne.gov.uk/sites/default/files/Documents/Planning/pp_PreSubmission%20Local%20Plan%20-%20Track%20Changes%20version%20V2.pdf [accessed 05/12/2017]

¹⁴ <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/new-local-plan/developing-the-new-local-plan/?entryid1139=67198> [accessed 05/12/2017]

¹⁵ <https://brentwood.jdi-consult.net/localplan/readdoc.php?docid=8&chapter=5&docelemid=d1160#d1160> [accessed 05/12/2017]

¹⁶ <http://havering.objective.co.uk/file/4645335http://havering.objective.co.uk/file/4645335> [accessed 05/12/2017]

¹⁷ https://www.redbridge.gov.uk/media/2268/final-web-pdf_redbridge-local-plan_reduced.pdf [accessed 05/12/2017]

¹⁸ <https://branding.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf> [accessed 31/10/2017]

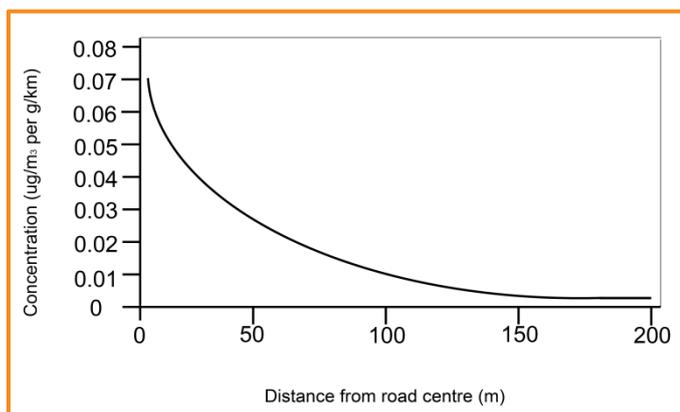
¹⁹ <https://new.enfield.gov.uk/services/planning/planning-policy/local-plan/planning-policy-information-enfield-core-strategy.pdf> [accessed 31/10/2017]

- 2.13 The Minerals and Waste Development Plans for Hertfordshire, Essex, London and Cambridgeshire are also of some relevance, since these may well contribute to increased vehicle movements on the road network within Epping (and thereby contribute to air quality impacts). The, Essex, Hertfordshire and Cambridgeshire Local Transport Plans to 2031 will also be important in terms of encouraging sustainable transport in the short term. However, the major impact is likely to be that of housing and commercial development within the surrounding districts as set out in Local Plans and these have therefore been the main focus of cumulative 'in combination' effects with regard to this HRA.
- 2.14 In relation to recreational activity, the following documents have been consulted for their plans and projects that may affect European sites in combination with development in Harlow: Lee Valley Regional Park Authority Site management Plan and Epping Forest Management Plan and visitor surveys.

Air Quality Impact Assessment

- 2.15 To support the 2016 HMA Options, traffic modelling and air quality impact assessment was undertaken in 2016 in line with the standard Design Manual for Roads and Bridges (DMRB) methodology²⁰ This modelled the predicted change in vehicle flows on roads within 200m of Epping Forest SAC and Lee Valley SPA and Ramsar site as a result of the all expected growth over the plan period (i.e. the development Options identified within the HMA, background population growth due to growth in surrounding authorities and delivery of existing consents within the HMA authorities).
- 2.16 As a general rule vehicle exhaust emissions are considered to only have a local effect within a narrow band along the roadside; typically within 200m of the centreline of the road. Beyond 200m emissions should generally have dispersed sufficiently that atmospheric concentrations are essentially background levels. The rate of decline is steeply curved rather than linear. In other words concentrations will decline rapidly as one begins to move away from the roadside, slackening to a more gradual decline over the rest of the distance up to 200m.

Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)²¹



- 2.17 There are two measures of particular relevance regarding air quality impacts from vehicle exhausts (although a third, ammonia concentrations, is also being modelled for Epping Forest SAC). The first is the concentration of oxides of nitrogen (known as NO_x) in the atmosphere. The main importance is as a source of nitrogen, which is then deposited on adjacent habitats (including directly onto the plants themselves) either directly (known as dry deposition) or washed out in rainfall (known as wet deposition). The deposited nitrogen can then have a range of effects, primarily growth stimulation or inhibition²², but also biochemical and

²⁰ Design Manual for Roads and Bridges, Volume 11, Section 3 Part 1 (HA207/07) and subsequent Interim Advice Notes

²¹ The addition of nitrogen is a form of fertilization, which can have a negative effect on habitats over time by encouraging more competitive plant species that can force out the less competitive species that are more characteristic of such habitats.

physiological effects such as changes to chlorophyll content. NO_x may also have some effects which are un-related to its role in total nitrogen intake (such as the acidity of the gas potentially affecting lipid biosynthesis) but the evidence for these effects is limited and they do not appear to occur until high annual concentrations of NO_x are reached. The guideline atmospheric concentration of NO_x advocated by Government for the protection of vegetation is 30 micrograms per cubic metre (µgm⁻³), known as the Critical Level. This is driven by the role of NO_x in nitrogen deposition and in particular in growth stimulation and inhibition. If the total NO_x concentration in a given area is below the critical level, it is unlikely that nitrogen deposition will be an issue unless there are other sources of nitrogen (e.g. ammonia). If it is above the critical level then local nitrogen deposition from NO_x could be an issue and should be investigated.

- 2.18 The second important metric is a direct determination of the rate of the resulting nitrogen deposition. Calculating nitrogen deposition rates rather than relying purely on scrutiny of NO_x concentrations has the advantage of being habitat specific (the critical level for NO_x is entirely generic; in reality different habitats have varying tolerance to nitrogen) and, for many habitats, of being directly relatable to measurable effects on the ground through scrutiny of published dose-response relationships that do not exist for NO_x. Unlike NO_x, the nitrogen deposition rate below which current evidence suggests that effects should not arise is different for each habitat. The rate (known as the Critical Load) is provided on the UK Air Pollution Information System website (www.apis.ac.uk) and is expressed as a quantity (kilograms) of nitrogen over a given area (hectare) per year (kgNha⁻¹yr⁻¹). More recently, there has also been research compiled²³ which investigates nitrogen dose-response relationships in a range of habitats.
- 2.19 For completeness, rates of acid deposition were also calculated. Acid deposition derives from both sulphur and nitrogen. It is expressed in terms of kiloequivalents (keq) per hectare per year. The thresholds against which acid deposition is assessed are referred to as the Critical Load Function. The principle is similar to that for a nitrogen deposition Critical Load but it is calculated very differently.
- 2.20 For the 2016 modelling, a series of road links within 200m of Epping Forest SAC and the Lee Valley SPA and Ramsar site were identified for further investigation. In their consultation response on the 2016 draft HRA for Epping Forest Local Plan Natural England confirmed that they were satisfied that the area of the Lee Valley SPA being analysed (Rye Meads) was not susceptible to atmospheric pollution from road traffic. That site is therefore not discussed further and the discussion focusses on Epping Forest SAC. Road links in proximity to Epping Forest SAC are identified in Table 2.

Table 2: Location of Road Links analysed within 200m of Epping Forest SAC in 2016

Road Link	Ecological Site	Distance of Link from Designated Site
A121 (two sections)	Epping Forest SAC	Adjacent
A104	Epping Forest SAC	Adjacent
B1393	Epping Forest SAC	Adjacent
B172	Epping Forest SAC	Adjacent
Theydon Road	Epping Forest SAC	Adjacent

- 2.21 In April 2017 a High Court judgment²⁴ (colloquially known as the Ashdown Forest Judgment) partially quashed the Lewes District and South Downs National Park Joint Core Strategy. This was on the basis that the HRA supporting the Joint Core Strategy only considered its own contribution to changes in traffic flows (and specifically whether such flows would exceed 1000 Annual Average Daily Traffic) in determining whether there would be a likely significant air quality effect on Ashdown Forest SPA. The judge ruled that the HRA had thus explicitly failed

²³ Compiled and analysed in Caporn, S., Field, C., Payne, R., Dise, N., Britton, A., Emmett, B., Jones, L., Phoenix, G., S Power, S., Sheppard, L. & Stevens, C. 2016. Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance. Natural England Commissioned Reports, Number 210.

²⁴ <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [accessed 26/10/2017]

to undertake any form of assessment 'in combination' with growth in other authorities that would affect the same road links and that this was in contravention of the Conservation of Habitats and Species Regulations 2010.

2.22 The air quality modelling undertaken for the South Essex/East Hertfordshire HMA authorities in 2016 avoided the problems that led to the successful Ashdown Forest Judicial Review for three reasons:

- The modelling was undertaken for a group of four authorities around Epping Forest SAC rather than for a single authority;
- Even when the change in flows due to the HMA growth options was forecast to be below 1,000 AADT air quality modelling was still undertaken; and
- The air quality modelling undertaken for the 2016 HRA was in accordance with standard methodology in Volume 11 of the Design Manual for Roads and Bridges. This method inherently involves modelling growth in surrounding authorities outside the HMA (such as Redbridge, Waltham Forest and Broxbourne) to generate a forecast of future flows known as the 'Do Minimum' scenario. HMA growth was then factored into the Do Minimum scenario to create the 'Do Something' scenario. Therefore, the Do Something scenario reported in Appendix C represented the forecast total flows expected by 2033 based on the traffic modelling available in 2016, irrespective of source.

2.23 This modelling is due to be updated in 2018 and a programme of air quality monitoring has also been commenced that will enable future air quality along roads through Epping Forest SAC to be tracked as the Local Plan housing and employment delivery takes place. The Do Minimum scenario drew upon a government database tool called the National Trip End Model Presentation Programme (TEMPro). This contains data for each local authority district in England regarding expected changes in population, households, workforce and employment (in addition to data such as car ownership). The traffic modellers used this to forecast the change in traffic flows that would occur due to growth other than the HMA Local Plans over the period to 2033 (e.g. that arising from Redbridge, Broxbourne, Waltham Forest and further afield), onto which were added outstanding permissions in the HMA authorities. The result was the Do Minimum scenario. Growth in the HMA Local Plans was then modelled and factored into the Do Minimum scenario to create the Do Something scenario. Comparing the Do Something scenario with the Base case therefore enables one to see the effect of all forecast traffic growth on the roads in question 'in combination' using the 2016 data, within the context of forecast improvement in vehicle emission factors and background nitrogen deposition rates over the same timescale.

2.24 Traditionally, the implications of the 'in combination' scenario would only have been discussed if the forecast change in flows due to the HMA Local Plans exceeded either 1,000 AADT or 1% of the critical level (for NO_x) or load (for nitrogen and acid deposition). In the light of the Ashdown Forest case AECOM now generally begins the examination of the air quality modelling with a discussion of the 'in combination' scenario, irrespective of the contribution made by HMA growth.

2.25 Using the generated traffic scenarios, and information on average vehicle speeds and percentage heavy duty vehicles (both of which influence the emissions profile), air quality specialists calculated expected NO_x concentrations, nitrogen deposition rates and acid deposition rates for those road links where traffic flows were forecast to increase as a result of all forecast traffic growth. For some road sections (particularly around Wake Arms Roundabout) multiple transects were modelled to account for the influence of the predominant wind direction and emissions from the other nearby road links.

2.26 The predictions of nitrogen deposition and annual mean NO_x concentrations are based on the assessment methodology presented in Annex F of the Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)²⁵ for the assessment of impacts on

²⁵ Design Manual for Roads and Bridges, HA207/07, Highways Agency

sensitive designated ecosystems due to highways works. Background data for the predictions for 2033 were sourced from the Department of Environment, Food and Rural Affairs (Defra) background maps for 2013 projected forward to 2033²⁶. Background nitrogen deposition rates were sourced from the Air Pollution Information System (APIS) website²⁷.

- 2.27 Guidance note HA207/07²⁸ advises that background rates are reduced by 2% per year to allow for an improvement in background air quality over the Local/District Plan period (2033) as a result of ongoing national initiatives to improve emissions and the expected improvement in vehicle emissions over that period. However, due to the uncertainty in the rate with which projected future vehicle emission rates and background pollution concentrations are improving, the assumption was made in the 2016 modelling that conditions in 2023 (the midpoint between the base year and the year of assessment) are representative of conditions in 2033 (the year of assessment). This approach is accepted within the professional air quality community and accounts for known recent improvements in vehicle technologies (new standard Euro 6/VI vehicles), whilst excluding the more distant and therefore more uncertain projections on the future evolution of the vehicle fleet.
- 2.28 Annual mean concentrations of NO_x were calculated at two 200m transects modelled at 1m, 10m, 20m, 50m, 100m, 150m, and 200m back from all Links. Predictions were made using the latest version of ADMS-Roads using emission rates derived from the Defra Emission Factor Toolkit (version 6.0.2) which utilises traffic data in the form of 24-hour Annual Average Daily Traffic (AADT)²⁹, detailed vehicle fleet composition and average speed. The end of the Local/District Plan (2033) period was selected for the future scenario as this is the point at which the total emissions due to Plan traffic will be at their greatest.
- 2.29 It should be noted that the data in **Appendix C** are the results of the 2016 modelling. As a result of that modelling and broader discussion with Natural England and City of London Corporation, the HMA authorities have agreed that a mitigation strategy should be devised³⁰. Since that commitment was made governance arrangements are in place and traffic modellers have been working on potential traffic mitigation scenarios. These are shortly to be tested through updated air quality modelling, which will also take account of queuing traffic at Wake Arms Roundabout and ammonia emission from traffic. That modelling will supercede the modelling presented in this document. This HRA will therefore be updated in the light of new modelling to ensure it remains up to date. While development in Harlow District will have some influence on traffic flows through Epping Forest SAC, flows arising from local sources are likely to be influenced more by the quantum and distribution of additional housing and employment growth in local authorities closer to the SAC such as Epping Forest District and the London Boroughs of Waltham Forest and Redbridge.
- 2.30 A programme of long-term air quality monitoring has also been commissioned with input from the City of London Corporation. This will be useful in air quality model verification but its main value will be in tracking the expected improvement in emissions over the plan period. This can feed into any regular reviews of housing/employment quantum and mitigation measures over the plan period.

²⁶ Air Quality Archive Background Maps. Defra, 2013. Available from: <http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html>

²⁷ Air Pollution Information System (APIS) www.apis.ac.uk

²⁸ Design Manual for Roads and Bridges, HA207/07, Highways Agency

²⁹ Derived from Peak Flow data

³⁰ The MoU states that 'It is intended this Joint Strategy will be in agreed and published prior to the determination of any of the planning applications on sites around Harlow that are part of The Spatial Option detailed in the "Distribution of OAN across West Essex and East Hertfordshire" MoU. If the Joint Strategy is not in place when planning applications are submitted, applicants will be required to submit the necessary information to ascertain whether any adverse impacts will be caused in Epping Forest, and if necessary any mitigation measures that may be necessary'.

3. Pathways of Impact

Introduction

- 3.1 In carrying out an HRA it is important to determine the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with internationally designated sites, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon an internationally designated site. Following screening of the Plan, the following impact pathways are considered within this document.

Disturbance from Recreational Activities

- 3.2 Recreational use of an internationally designated site has potential to:
- Cause damage through mechanical/ abrasive damage and nutrient enrichment;
 - Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl; and
 - Prevent appropriate management or exacerbate existing management difficulties.
- 3.3 Different types of internationally designated sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

Mechanical/Abrasive Damage and Nutrient Enrichment

- 3.4 Most types of terrestrial internationally designated site can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.
- 3.5 There have been several papers published that empirically demonstrate that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists:
- Wilson & Seney (1994)³¹ examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
 - Cole et al (1995a, b)³² conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow and grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two

³¹ Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

³² Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole (1995c)³³ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
 - Cole & Spildie (1998)³⁴ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance, but recovered rapidly. Higher trampling intensities caused more disturbance.
- 3.6 The total volume of dog faeces deposited on sites can be surprisingly large. For example, at Burnham Beeches National Nature Reserve over one year, Barnard³⁵ estimated the total amounts of urine and faeces from dogs as 30,000 litres and 60 tonnes respectively. The specific impact on Epping Forest SAC has not been quantified from local studies; however, the fact that habitats for which the SAC is designated appear to be subject already to excessive nitrogen deposition, suggests that any additional source of nutrient enrichment (including uncollected dog faeces) will make a cumulative contribution to overall enrichment. Any such contribution must then be considered within the context of other recreational sources of impact on sites.

Disturbance

- 3.7 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding³⁶. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately the survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds³⁷.
- 3.8 The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages, such that disturbance which results in abandonment of suitable feeding areas through disturbance can have severe consequences. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

³³ Cole, D.N. (1995c) Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah

³⁴ Cole, D.N., Spildie, D.R. (1998) Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

³⁵ Barnard, A. (2003) Getting the Facts - Dog Walking and Visitor Number Surveys at Burnham Beeches and their Implications for the Management Process. *Countryside Recreation*, 11, 16 - 19

³⁶ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

³⁷ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

- Underhill et al³⁸ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
 - Evans & Warrington³⁹ found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire, and attributed this to displacement of birds resulting from greater recreational activity on surrounding water bodies at weekends relative to week days.
 - Tuite et al⁴⁰ used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that on inland water bodies shoveler was one of the most sensitive species to disturbance. The greatest impact on winter wildfowl numbers was associated with sailing/windsurfing and rowing.
 - Pease et al⁴¹ investigated the responses of seven species of dabbling ducks to a range of potential causes of disturbance, ranging from pedestrians to vehicle movements. They determined that walking and biking created greater disturbance than vehicles and that gadwall were among the most sensitive of the species studied.
 - In a three-year study of wetland birds at the Stour and Orwell SPA, Ravenscroft⁴² found that walkers, boats and dogs were the most regular source of disturbance. Despite this, the greatest responses came from relatively infrequent events, such as gun shots and aircraft noise. Birds seemed to habituate to frequent 'benign' events such as vehicles, sailing and horses, but there was evidence that apparent habituation to more disruptive events related to reduced bird numbers – i.e. birds were avoiding the most frequently disturbed areas. Disturbance was greatest at high tide and on the Orwell, but birds on the Stour showed greatest sensitivity.
- 3.9 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer. In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces⁴³.
- 3.10 Underhill-Day⁴⁴ summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54.0%.
- 3.11 However the outcomes of many of these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population⁴⁵. A literature review undertaken for the

³⁸ Underhill, M.C. *et al.* 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

³⁹ Evans, D.M. & Warrington, S. 1997. The effects of recreational disturbance on wintering waterbirds on a mature gravel pit lake near London. *International Journal of Environmental Studies* 53: 167-182

⁴⁰ Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* 21: 41-62

⁴¹ Pease, M.L., Rose, R.K. & Butler, M.J. 2005. Effects of human disturbances on the behavior of wintering ducks. *Wildlife Society Bulletin* 33 (1): 103-112.

⁴² Ravenscroft, N. (2005) Pilot study into disturbance of waders and wildfowl on the Stour-Orwell SPA: analysis of 2004/05 data. Era report 44, Report to Suffolk Coast & Heaths Unit.

⁴³ Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, 74, 77-82.

⁴⁴ Underhill-Day, J.C. (2005). A literature review of urban effects on lowland heaths and their wildlife. Natural England Research Report 623.

⁴⁵ Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, 97, 265-268

RSPB⁴⁶ also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on internationally designated sites.

- 3.12 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration (such as those often associated with construction activities). Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 3.13 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.
- 3.14 The Site Improvement Plan (SIP)⁴⁷ for the Lee Valley SPA identifies that '*Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly.*' It does not conclude that current recreational activity on the site is unsustainable; rather it identifies a project to first '*Investigate whether there is a need for change to access management.*' The SIP for Epping Forest identifies that '*Epping Forest is subject to high recreational pressure. There is a high general level of footfall in Epping Forest throughout the year, including periods of significant use, and resulting in a diverse range of impacts which include mountain biking and unmanaged fires. Population and visitor numbers are likely to continue to increase.*' As such these sites have the potential to be sensitive to any increases in recreational pressure stemming from new development.
- 3.15 It should be emphasised that recreational use is not inevitably a problem. Many internationally designated sites are also nature reserves managed for conservation and public appreciation of nature. The Lee Valley Regional Park that encompasses the SPA and Ramsar sites is such an example. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 3.16 The Epping Forest SAC and Lee Valley SPA and Ramsar site lies within the District boundary, whilst Wormley-Hoddesdonpark Woods SAC is located 2.2km from the District boundary. As such they are potentially vulnerable to the effects of recreational pressure and/ or disturbances from construction activities resulting from development within Harlow.
- 3.17 It is therefore necessary to perform an initial screening exercise to determine whether the Local Plan contains policy measures that could lead to a likely significant effects, either alone or 'in combination' with other plans and projects, through recreational pressure, on these internationally designated sites.

Wormley-HoddesdonPark Woods SAC

- 3.18 Wormley-HoddesdonPark Woods SAC is located 6.3km from the boundary of Harlow District. The SAC is a large, attractive area of ancient woodland with extensive public access and close to large urban centres. The majority of the woods in the complex are in sympathetic ownership, with no direct threat (Wormley-Hoddesdonpark Wood, for example, is managed by The Woodland Trust). No visitor survey data that identifies the recreational catchment could be sourced for Wormley-Hoddesdonpark Woods. However, data does exist for other large woodland European sites, such as Ashdown Forest⁴⁸ and Epping Forest SAC. These indicate

⁴⁶ Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

⁴⁷ <http://publications.naturalengland.org.uk/file/5788502547496960> [accessed 17/01/2018]

⁴⁸ Clarke RT, Sharp J & Liley D. 2010. Ashdown Forest Visitor Survey Data Analysis (Natural England Commissioned Reports, Number 048) and subsequent analyses
UE Associates and University of Brighton. 2009. Visitor Access Patterns on the Ashdown Forest: Recreational Use and Nature Conservation

that core visitor catchments (i.e. the zone within which the majority (c. 75%) of regular, frequent visitors are concentrated) tend to lie between c. 5km (Epping Forest) and 6-7km (Ashdown Forest) from the site. If the more precautionary figure of 7km is used for Wormley Hoddesdonpark Woods in the absence of bespoke visitor data for this site, the zone would include small portions of the built up areas in the west of Harlow such as Eastend which is largely industrial, but none of the larger residential areas.

- 3.19 Natural England's Site Improvement Plan (SIP)⁴⁹ indicates that the site is heavily used by the public for recreational purposes. However, it also indicates that recreational activity is generally well-managed. Sensitive management of access points and routes by the site's main owners has been largely successful in mitigating the potential adverse effects of this high level of use. As such, general recreational pressure is not indicated in the Site Improvement Plan as a current or future obstacle to achieving or maintaining favourable conservation status and preserving the integrity of the SAC.
- 3.20 Recreation is actively promoted on this site and most recreation is concentrated on well-established paths. Most of the complex is covered by a High Forest Zone Plan (Hertfordshire County Council 1996) which sets out a framework for woodland management across the whole area. It aims to restore a varied age structure and natural stand types through sustainable forestry.
- 3.21 Based on the issues identified in the Site Improvement Plan⁵⁰ and the fact that concerns about recreational pressure on this site have not been flagged by Natural England during the preparation of the Local Plan and its HRA, which commenced in 2012, there is no basis to conclude that such an increase would result in a likely significant effect on the SAC.
- 3.22 Additionally, Wormley-Hoddesdonpark Woods SAC is located within the borough of Broxbourne. The screening assessment of Broxbourne's draft Local Plan⁵¹ (undertaken in December 2016) enabled this impact pathway to be screened out alone and in combination with other projects and plans. Based on these conclusions and the quantum and location of new housing within Epping Forest District it is considered that it would not result in a likely significant effect in combination.
- 3.23 As recreational pressure is the only potentially impact pathway linking the LDP to this SAC, it can be concluded that the LDP will not impact on the SAC in isolation or combination and as such is not discussed further within this document.
- 3.24 As such impacts relating to recreational pressure are discussed with regards to Epping Forest SAC and Lee Valley SPA and Ramsar site later in this document.

Atmospheric Pollution

- 3.25 The main pollutants of concern for European sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). Ammonia can have a directly toxic effect upon vegetation and research suggests that this may also be true for NO_x at very high concentrations. More significantly, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to vegetation and soils. An increase in the deposition of nitrogen from the atmosphere is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

⁴⁹ <http://publications.naturalengland.org.uk/file/6541134543192064> [accessed 05/12/2017]

⁵⁰ <http://publications.naturalengland.org.uk/file/6541134543192064> [accessed 05/12/2017]

⁵¹ https://www.broxbourne.gov.uk/sites/default/files/Documents/Planning/pp_LC-218_Broxbourne_HRA_Screening_8_051216JE-compressed.pdf [accessed 05/12/2017]

Table 3: Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on habitats and species
Acid deposition	SO ₂ , NO _x and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased N emissions may cancel out any gains produced by reduced S levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH ₃)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄ ⁺) - containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH ₃ is rapidly deposited, some of the most acute problems of NH ₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations, one-half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen compounds (nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) can lead to both soil and freshwater acidification. In addition, NO _x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to nitrogen deposition derive mainly from NO _x and NH ₃ emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions from NO _x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action	Concentrations of O ₃ above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.

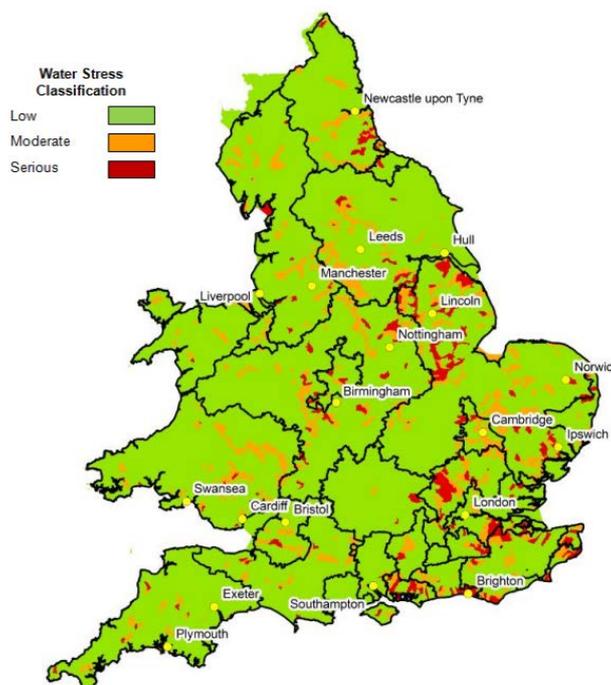
	at international level to reduce levels of the precursors that form ozone.	
Sulphur Dioxide (SO ₂)	Main sources of SO ₂ emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO ₂ emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

3.26 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. NO_x emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). Within a 'typical' housing development, by far the largest contribution to NO_x (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁵². Emissions of NO_x could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the plan.

Water Abstraction

3.27 The East of England is generally an area of high water stress. It is particularly vulnerable to climate change now and in the future. It is already the driest region in the country and the predicted changes will affect the amount and distribution of rainfall, and the demand for water from all sectors. The average natural summer flows of rivers could drastically reduce; the period where groundwater resources are replenished could be shorter; and resources could become much more vulnerable.

Figure 4: Areas of water stress within England.⁵³



⁵² Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

⁵³ Figure adapted from Environment Agency. 2013. Water stressed areas – final classification https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

- 3.28 Climate change is expected to result in variations in patterns and frequencies of drought, floods and other extreme weather conditions which are likely to result in a reduction in potable water resources⁵⁴. The reliability of existing reservoirs, groundwater extractions and river intakes will change. The delivery of housing and economic development throughout the region could therefore result in adverse effects on many internationally designated sites in the region including those listed in preceding sections.
- 3.29 Harlow District lies within the Affinity Water supply area, specifically their Central Region, WRZ 5. Under Affinity Water's current Water Resource management Plan⁵⁵ 60% of the Central Region's water supply comes from groundwater sources (chalk and gravel aquifers) and 40% comes from surface water sources and imports from neighbouring water companies (Thames Water, Anglian Water and Cambridge Water). Water is also exported to South East Water and Cambridge Water⁵⁶.

Water Quality

- 3.30 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:
- 3.31 At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.
 - Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.
- 3.32 Sewage and some industrial effluent discharges contribute to increased nutrients in the European sites and in particular to phosphate levels in watercourses. Rye Meads SSSI component of the Lee Valley SPA and Ramsar site is situated 2.6km to the west of Harlow and is particularly sensitive to eutrophication (nutrient enrichment) resulting from the discharge of treated sewage effluent from Rye Meads STW. The draft detailed Rye Meads Water Cycle Study has indicated that the growth in the Stevenage and East Hertfordshire areas is constrained by the environmental capacity of the River Lee and associated Lee Valley SPA and by wastewater infrastructure issues in terms of timescale for delivery.
- 3.33 Diffuse pollution (for example from agricultural practices or urban runoff) is a key contributor to water pollution in rivers. Through its Review of Consents process, the Environment Agency has identified diffuse pollution to be a major factor in causing unfavourable conservation status of European sites. Although agriculture remains a primary source of eutrophication and pollution, urban runoff is a significant source of aquatic contamination. The rate of conversion of land to residential use has been shown to be related to poor water quality.

⁵⁴ The Affinity Water (2014) Final Water Resource management Plan, 2015-2040 identifies that within the Affinity Water catchment there will be a reduction of 32.31 peak DO MI/d to 2040.

⁵⁵ Affinity Water (2014) Final Water Resource management Plan, 2015-2040.

⁵⁶ Affinity Water (2014) Final Water Resource management Plan, 2015-2040.

4. Initial Policy Sift

Screening of LDP Policies

4.1 **Table 4** presents an initial sift of policies within the LDP, from the point of view of HRA. Where Policies have been coloured green in the ‘HRA Screening Implications’ column, this indicates that the Policies do not contain potential impact pathways linking to European designated sites and have been screened out from further consideration. Where Policies have been coloured orange in the ‘HRA Screening Implications’ column, this indicates that the Policies have potential impact pathways linking to European sites and have been screened in for further consideration in this report.

Table 4: Screening Assessment of Local Development Plan Policies

Policy	Policy Detail	HRA Screening Implications
<p>HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Communities</p>	<p>Four strategic Garden Communities are planned in the Harlow and Gilston Garden Communities and the relevant site/s are allocated in the Harlow, Epping Forest and East Hertfordshire District Local Plans:</p> <p>(a) South of Harlow (Latton Priory) – delivering approximately 1,050 dwellings over the Local Plan period (within Epping Forest District);</p> <p>(b) West of Harlow (Water Lane Area) – delivering approximately 2,100 dwellings over the Local Plan period (within Epping Forest District);</p> <p>(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 Harlow District);</p> <p>(d) Gilston - delivering approximately 3,000 dwellings over the Local Plan period with a further 7,000 dwellings beyond the Plan period (within East Herts District).</p> <p>Provides development principals with which all each Garden Community must accord/ these include:</p> <ul style="list-style-type: none"> • Pro-active and collaborative working with the public and private sector; • Community and stakeholder engagement and a long-term community engagement strategy; • Provision of sustainable long-term governance and stewardship arrangements for the community assets including Green Infrastructure; • Provision of a Strategic Masterplan; • Provision of on-site and off-site infrastructure ahead or in tandem with the proposed development; • Provides for housing mix, promotes small scale employment generation; 	<p>Potential HRA implications.</p> <p>This policy provides for 2,600 new dwellings on the strategic site to the east of Harlow town during the Plan period, and another 13,500 dwellings across the remainder of Harlow and Garden Communities located in East Hertfordshire and Epping Forest Districts. It also encourages small scale employment, but does not identify any location or quantum.</p> <p>This policy provides for 2,600 dwellings within Harlow District at an allocation (East of Harlow) that is located more than 9km from a European site.</p> <p>Potential linking impact pathways are:</p> <ul style="list-style-type: none"> • Recreational Pressure • Atmospheric pollution • Water quality • Water abstraction <p>It is noted that this policy does provide</p>

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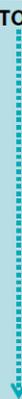
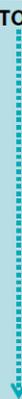
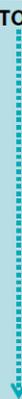
	<ul style="list-style-type: none"> • Create a change in modal shift towards Sustainable Transport Modes that maximises the use of sustainable transport modes including walking, cycling and use of public and community transport, and creating walkable communities 	<p>positive provision of a modal shift towards sustainable transport such as walking, cycling and public and community transportation which has potential to reduce atmospheric pollution contributions. Supporting text states '5.16... Aspirations include a modal travel shift towards 60% by sustainable modes of transport and 40% car-based.' This policy also provides for the delivery of infrastructure ahead or in tandem with the delivery of development which has the potential to prevent impacts on a sensitive designated site. Nonetheless this policy cannot be screened out alone.</p> <p>It is noted that this policy includes the provision of development beyond the District boundary that is to be located within the neighbouring districts of Epping Forest District and East Hertfordshire District Council. Following the Housing Market Area HMA assessment (that includes Harlow Council, Epping Forest District Council, East Herts District Council and Uttlesford District Council), under the Duty to Cooperate (DtC), the neighbouring authorities are working with Harlow District Council to accommodate Harlow's housing need. However, the development provided outside of Harlow District boundary is not specifically allocated within this plan document, but rather the plan documents of the relevant neighbouring authorities (and their HRAs). As such in combination consideration will be required.</p>
<p>SD1 Presumption in Favour of Sustainable Development</p>	<p>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, it</p>	<p>No HRA implications. A Development management (DM) policy providing criteria under which the Council</p>

	<p>will normally be supported, unless material considerations indicate otherwise and/or either of the following apply:</p> <p>(a) any adverse impacts arising from the development would significantly and demonstrably outweigh the benefits, when assessed against national planning policies;</p> <p>(b) specific national policies indicate that the development should be restricted.</p>	<p>will/ will not support development. There are no HRA implications.</p>
<p>HS1 Housing Delivery</p>	<p>The Local Plan identifies sites to deliver at least 9,200 dwellings for the period of 1 April 2011 to 31 March 2033.</p>	<p>Potential HRA implications Provides for 9,200 dwellings in Harlow District Council boundary during the Plan period (2011 to 2033). Potential impact pathways present are:</p> <ul style="list-style-type: none"> • Recreational pressure • Atmospheric pollution • Water quality • Water abstraction <p>This policy cannot be screened out</p>
<p>HS2 Housing Allocations</p>	<p>See screening Table 5 provided in Chapter 4 for site by site analysis</p>	<p>Potential HRA implications Provides residential site allocations during the Plan period (2011 to 2033). Screening for individual allocations undertaken in Table 5 of Chapter 4 identifies that all allocations can be screened out in isolation. However in combination the residential allocations could provide the following linking impact pathways:</p> <ul style="list-style-type: none"> • Recreational pressure • Atmospheric pollution • Water quality • Water abstraction
<p>HS3 Strategic Housing Site East of Harlow</p>	<p>Provides for 2,600 dwellings and associated infrastructure is allocated on land to the east of Harlow. Identifies the need for Master Planning to be provided in partnership with stakeholders, including infrastructure providers. Provides for highway solutions to address impacts on the wider road network (including new Junction 7a on the M11). Provides the relevant infrastructure (this policy does not limit the infrastructure</p>	<p>Potential HRA implications Provides for 2,600 dwellings in Harlow District Council boundary during the Plan period (2011 to 2033). This site is located more than 9km from both Epping Forest SAC and Lee Valley SPA/ Ramsar site. Potential impact pathways present are:</p>

	<p>type. Provides for footpaths, cycleways and bridleways Provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment. Infrastructure must be delivered at a pace which meets the needs of the proposed and developers will be expected to contribute towards the strategic highway and other infrastructure requirements.</p>	<ul style="list-style-type: none"> • Recreational Pressure • Atmospheric pollution • Water quality • Water abstraction <p>This policy provides positive provision for the inclusion of partnerships with stakeholders including infrastructure providers, provision of footpaths and cycleways that could lead to a reduction in atmospheric pollution contributions; and developer contributions towards infrastructure required for development. Nonetheless this policy cannot be screened out</p>						
<p>HS4 Gypsies and Travellers</p>	<p>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 Development Management policy H10.</p>	<p>Potential HRA implications Identifies the provision of 12 pitches at Fern Hill Lane. Fern Hill Lane is located more than 6km from both Epping Forest SAC and Lee Valley SPA and Ramsar site. It also provides DM criteria under which additional pitches would be assessed but no location or quantum is identified. Whilst this policy provides for a small quantum of development in combination implications relating to atmospheric pollution exist.</p>						
<p>ED1 Future Employment Floorspace</p>	<p>Provides for 18.8ha of B1 uses at Harlow Business Park at the Pinnacles and at the Harlow Enterprise Zone at London Road. 2.2ha of land will be delivered for employment uses at Templefields. These employment sites are allocated on the Policies Map with the following reference numbers.</p> <table border="1" data-bbox="622 1257 1570 1390"> <thead> <tr> <th>Ref</th> <th>Location</th> <th>Capacity</th> </tr> </thead> <tbody> <tr> <td>ED1-01</td> <td>Harlow Business Park, The Pinnacles</td> <td>4.6ha</td> </tr> </tbody> </table>	Ref	Location	Capacity	ED1-01	Harlow Business Park, The Pinnacles	4.6ha	<p>Potential HRA implications Provides for approximately 20ha of new employment space. See screening Table 5 provided in Chapter 4 for detailed assessment.</p> <p>Potential impact pathways present are:</p> <ul style="list-style-type: none"> • Atmospheric pollution • Water quality • Water abstraction
Ref	Location	Capacity						
ED1-01	Harlow Business Park, The Pinnacles	4.6ha						

	<table border="1"> <tr> <td>ED1-02</td> <td>London Road</td> <td>14.2ha</td> </tr> <tr> <td>ED1-03</td> <td>East Road, Templefields</td> <td>2.2ha</td> </tr> <tr> <td></td> <td>Total Employment Provision</td> <td>20ha</td> </tr> </table> <p>Opportunities for office floorspace in Harlow Town Centre will be identified through the Harlow Town Centre Area Action Plan.</p>	ED1-02	London Road	14.2ha	ED1-03	East Road, Templefields	2.2ha		Total Employment Provision	20ha	
ED1-02	London Road	14.2ha									
ED1-03	East Road, Templefields	2.2ha									
	Total Employment Provision	20ha									
ED2 Protecting Existing Employment Floorspace	<p>Provides for the retention of existing strategic employment sites at The Pinnacles, Templefields and London Road.</p> <p>Growth will be supported at The Pinnacles (ED01) and Templefields (ED03).</p> <p>Provides for the protection and provision of smaller employment units.</p>	<p>No HRA implications.</p> <p>This policy provides for the protection of existing employment sites and supports growth and development, however no quantum is provided.</p> <p>There are no impact pathways present</p>									
ED3 Developing a Skills Strategy for Harlow	<p>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.</p>	<p>No HRA implications.</p> <p>A strategy relating to the delivery of a strategy to develop skills within Harlow.</p> <p>There are no impact pathways present.</p>									
ED4 Developing a Visitor Economy	<p>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.</p> <p>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.</p>	<p>Potential HRA implications</p> <p>A DM policy supporting the development of the visitor economy. This type of development has potential to link to the following impact pathways are:</p> <ul style="list-style-type: none"> • Recreational pressure • Atmospheric pollution • Water quality • Water abstraction 									
RS1 Retail Hierarchy	<p>Provides the retail hierarchy.</p>	<p>No HRA implications.</p> <p>A DM policy relating to retail hierarchy.</p> <p>There are no impact pathways present.</p>									

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	<p>Retail development must be directed to Harlow Town Centre first, followed by the centres set out in the retail hierarchy below.</p> <table border="1" data-bbox="629 233 1451 735"> <thead> <tr> <th></th> <th>POSITION IN RETAIL HIERARCHY</th> <th>RETAIL CENTRE</th> </tr> </thead> <tbody> <tr> <td rowspan="4" style="text-align: center; vertical-align: middle;"> TOP  BOTTOM </td> <td>Town Centre</td> <td>Harlow Town Centre</td> </tr> <tr> <td>Neighbourhood Centres</td> <td>Bush Fair The Stow Old Harlow Church Langley Staple Tye</td> </tr> <tr> <td>Hatches</td> <td>Burgoyne Maunds Crawley Mill Clifton Prentice Place Colt Pollards Coppice Pypers Elm Sherards Fishers Slacksbury Katherines Sumners Manor Ward</td> </tr> <tr> <td>Out-of-Centre Retail Parks (on Edinburgh Way)</td> <td>Queensgate Centre The Oaks St James Centre Princes Gate Harlow Retail Park</td> </tr> </tbody> </table> <p>Harlow's Retail Centres are identified on the Policies Map.</p>		POSITION IN RETAIL HIERARCHY	RETAIL CENTRE	TOP  BOTTOM	Town Centre	Harlow Town Centre	Neighbourhood Centres	Bush Fair The Stow Old Harlow Church Langley Staple Tye	Hatches	Burgoyne Maunds Crawley Mill Clifton Prentice Place Colt Pollards Coppice Pypers Elm Sherards Fishers Slacksbury Katherines Sumners Manor Ward	Out-of-Centre Retail Parks (on Edinburgh Way)	Queensgate Centre The Oaks St James Centre Princes Gate Harlow Retail Park	
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<p>RS2 Future Retail Floorspace</p>	<p>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.</p> <p>In order to plan for residential development coming forward in the Harlow and Gilston Garden Communities 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.</p> <p>Identifies that a Town Centre Area Action Plan will be prepared for Harlow Town Centre. 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.</p> <p>The remaining floorspace requirement will be delivered through redevelopment opportunities in the district's Neighbourhood Centres and Hatches.</p>	<p>Potential HRA implications.</p> <p>The provision of increased retail floorspace has the potential to increase the need for goods to be transported and thus result in increased traffic flows.</p> <p>Potential impact pathways present are:</p> <ul style="list-style-type: none"> • Atmospheric pollution 												
<p>RS3 Protecting and Enhancing Existing Retail Centres</p>	<p>Protects and enhances existing retail centres.</p> <p>This policy does support residential development.</p>	<p>No HRA implications.</p> <p>A DM policy relating to the protection and enhancement of existing retail centres. No quantum is identified.</p> <p>There are no impact pathways</p>												

		Present.
WE1 Strategic Green Infrastructure	<p>The Strategic Green Infrastructure in Harlow includes the Green Belt, Green Wedges and Green Fingers which will be protected and enhanced.</p> <p>Other Open Spaces, landscaping, trees and hedgerows which contribute to the Green Infrastructure will also be protected and enhanced.</p> <p>New Green Infrastructure must be planned into new development and, where possible, linked to existing Green Infrastructure.</p> <p>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.</p>	<p>Potential HRA implications.</p> <p>Whilst this policy provides positive provision of the protection and enhancement of existing green infrastructure and the inclusion of new GI in all new development, it also provides for 'Stort Riverpark' that connects with the Lee Valley Regional Park and thus potentially also the Lee Valley SPA.</p> <p>Potential linking impact pathways are:</p> <ul style="list-style-type: none"> • Increased recreational pressure <p>It is noted that not the entirety of the Regional Park comprises European sites, as such this policy does have the positive ability to funnel people into the regional park that could also serve to spread out visitor activity if delivered appropriately.</p>
WE2 Green Wedges and Green Fingers	<p>Provides for Green Wedges. These are to provide Green Infrastructure, including open spaces for sport, recreation and quiet contemplation, wildlife corridors, footpaths, cycleways and bridleways amongst other provisions. Provides for Green Fingers. These are to provide Green Infrastructure, wildlife corridors, footpaths, cycleways and bridleways.</p>	<p>No HRA implications.</p> <p>This is a positive DM policy providing for green Wedges and Green Fingers (i.e. increased GI).</p> <p>There are no impact pathways present.</p>
WE3 Biodiversity and Geodiversity	<p>All biodiversity and geodiversity assets in the district will be preserved and enhanced. Assets of sufficient importance have a designation. The types of asset designations are:</p> <ul style="list-style-type: none"> • National designations (e.g. Sites of Special Scientific Interest) • Local designations (e.g. Local Wildlife Site) • Ancient woodland • Aged or veteran trees outside ancient woodland <p>Nationally and locally designated assets are identified on the Policies Map.</p>	<p>No HRA implications.</p> <p>A DM policy relating to Biodiversity and Geodiversity.</p> <p><i>For robustness it is recommended that this policy also provides for the protection of internationally designated wildlife sites both within and outside of the District as impact pathways stemming from Harlow have the potential to interact with European sites located within surrounding authorities.</i></p>
WE4 Heritage	<p>Provides for the preservation and enhancement of heritage assets as follows:</p>	<p>No HRA implications</p>

	<ul style="list-style-type: none"> • Conservation Areas • Scheduled Monuments • Listed buildings and their curtilage • Historic parks and gardens • Archaeological remains 	<p>A DM policy relating to heritage assets. There are no impact pathways present.</p>														
<p>SIR1 Infrastructure Requirements</p>	<p>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 Harlow and Harlow and Gilston Garden Town.</p> <p>An IDP identifies and prioritises infrastructure projects required in the LP. Details funding mechanisms for infrastructure development.</p> <p>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.</p> <p>The following infrastructure items have land use implications:</p> <table border="1" data-bbox="622 715 1570 1098"> <thead> <tr> <th>Ref</th> <th>Infrastructure Item</th> </tr> </thead> <tbody> <tr> <td>SIR1-01</td> <td>North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout</td> </tr> <tr> <td>SIR1-02</td> <td>East-West Sustainable Transport Corridor</td> </tr> <tr> <td>SIR1-03</td> <td>Second River Stort Crossing at River Way</td> </tr> <tr> <td>SIR1-04</td> <td>Access route for Strategic Housing Site East of Harlow</td> </tr> <tr> <td>SIR1-05</td> <td>Cemetery extension</td> </tr> <tr> <td>SIR1-06</td> <td>New allotment provision</td> </tr> </tbody> </table>	Ref	Infrastructure Item	SIR1-01	North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout	SIR1-02	East-West Sustainable Transport Corridor	SIR1-03	Second River Stort Crossing at River Way	SIR1-04	Access route for Strategic Housing Site East of Harlow	SIR1-05	Cemetery extension	SIR1-06	New allotment provision	<p>No HRA implications.</p> <p>A positive DM policy relating to the delivery and timely provision of new infrastructure to support development.</p> <p>This policy also identifies priority infrastructure projects in line with the IDP. The DM policy identifies funding mechanisms for these projects.</p> <p>There are no impact pathways present.</p>
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SIR1-06	New allotment provision															
<p>SIR2 Enhancing Key Gateway Locations</p>	<p>The following gateway locations have been identified in the district:</p> <ol style="list-style-type: none"> 1. Routes to and from Junction 7a of the M11 along Gilden 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 	<p>No HRA implications</p> <p>This policy provides for the enhancement of gateways. There are no linking impact pathways present.</p>														

	<p>6. Vehicular and pedestrian access points to the north of the Town Centre</p> <p>7. Vehicular and pedestrian access points at as you first enter the strategic employment sites</p> <p>The gateway locations above will be seamlessly integrated within the wider transport and green infrastructure network of Harlow and enhanced and improved.</p>	
SIR3 Waste and Minerals	<p>The Council will work with Essex County Council to bring forward the Waste and Minerals DPD.</p> <p>These documents form part of the Development Plan for Harlow and include Site SIR3-1 Harlow Mill Rail Station which is safeguarded as a Transshipment Site and Coated Stone Plant.</p>	<p>No HRA implications.</p> <p>A policy detailing the provision of a Waste and Minerals DPD</p>
PL1 Design Principles for Development	<p>Details the expectation of high standard of urban and architectural design for all development.</p> <p>Development will be supported if it provides criteria. These include: protecting, enhancing and providing Green Infrastructure</p>	<p>No HRA implications.</p> <p>A DM policy relating to design principles. There are no impact pathways present.</p>
PL2 Amenity Principles for Development	<p>Development which protects or improves the level of amenity of existing and future occupants and neighbours in the local area will be supported.</p>	<p>No HRA implications.</p> <p>A DM policy relating to amenity principles for development. There are no impact pathways present.</p>
PL3 Sustainable Design, Construction and Energy Usage	<p>New development will be expected to deliver high standards of sustainable design and construction and efficient energy usage. Such development will be supported where it meets or exceeds the minimum standards required by Building Regulations.</p>	<p>No HRA implications.</p> <p>A positive policy that provides for efficient energy use. This has potential to reduce atmospheric pollution contributions.</p> <p>There are no impact pathways present.</p>
PL4 Green Wedges and Green Fingers	<p>Provides criteria under which development on land designated as Green Wedge or Green Finger will be supported.</p>	<p>No HRA implications.</p> <p>A DM policy relating to development on Green Wedge and Green Finger land</p> <p>There are no impact pathways present.</p>
PL5 Other Open Spaces	<p>Provides criteria under which development on Other Open Spaces will be supported.</p> <p><i>Development on Other Open Spaces will be supported unless one or more of the following criteria are met:</i></p> <p><i>(a) the development would compromise the landscape character, openness, biodiversity or urban design principles of the town and/or the surrounding area;</i></p> <p><i>(b) the development would remove access to an open space which, in</i></p>	<p>Potential HRA implications</p> <p>Loss of publically accessible open space has the potential to increase recreational pressure within sensitive European sites.</p> <p>Potential impact pathways present include:</p> <ul style="list-style-type: none"> • Increased recreational pressure.

	<p><i>accordance with the current evidence, is of high quality and/or high public value in providing opportunities for sport and recreation;</i></p> <p><i>(c) the development would prejudice the potential for comprehensive development of adjacent land.'</i></p>	
PL6 Trees and Hedgerows	<p>Development and tree works applications, which ensure that trees and hedges are protected and enhanced, will be supported.</p> <p>Where development has a negative impact on existing trees and hedges, the proposal will be assessed based criteria listed.</p> <p>Development which includes the planting of new trees and hedges will be supported where criteria are met.</p>	<p>No HRA implications.</p> <p>A DM policy relating to trees and hedgerows.</p> <p>There are no linking impact pathways present.</p>
PL7 Green Infrastructure and Landscaping	<p>Green Infrastructure and landscaping must be protected and enhanced as part of development.</p> <p>Development will be supported where all the following criteria are met:</p> <p>(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;</p> <p>(b) existing Green Infrastructure and landscaping are, where possible, protected and enhanced and in all cases are sympathetically integrated into the development; and</p> <p>(c) development makes connections wherever possible to landscaping and Green Infrastructure outside of the site.</p>	<p>No HRA implications</p> <p>A positive DM policy providing for the protection and enhancement of GI.</p> <p>There are no impact pathways present.</p>
PL8 Biodiversity and Geodiversity Assets	<p>Development should contribute to and enhance biodiversity or geodiversity assets.</p> <p>The potential harm caused by development on these assets and their surroundings will be assessed based on the harm caused by the development.</p> <p>The greater the significance of the asset, the greater the weight that is given to the asset's protection.</p>	<p>No HRA implications.</p> <p>A DM policy relating to Biodiversity and Geodiversity Assets.</p> <p>There are no impact pathways present.</p>
PL9 Pollution and Contamination	<p>All development proposals must minimise and, where possible, reduce all forms of pollution and contamination. This includes impacts on noise, light, air quality and the natural environment amongst others.</p> <p>Where it can be demonstrated that pollution and/or contamination is unavoidable, appropriate measures must mitigate the negative effects of the development.</p>	<p>No HRA implications.</p> <p>A positive DM policy relating to pollution and contaminants.</p> <p>This policy identifies the need to minimise and reduce pollution and that development will not be supported if it will result in unacceptable impacts from pollutants (alone or in combination). It also identifies for the need for mitigation where pollution and contamination are</p>

		unavoidable. There are no impact pathways present.
PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems	<p>1. Water Quality Development will be supported unless it adversely affects water quality.</p> <p>2. 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.</p> <p>3. Flooding All development proposals will be considered against the NPPF (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.</p> <p>4. Sustainable Drainage Systems Provides criteria which development must meet relating to flooding and provides criteria relating to requirement of SuDS.</p>	<p>No HRA implications. A positive DM policy relating to water management. This policy provides for increased efficiency in water use, prevents development adversely affecting water quality, and provides for the use of SuDS. There are no linking impact pathways present.</p>
PL11 Heritage Assets and their Settings	Provides DM policy relating to Heritage Assets and their Settings	<p>No HRA implications. A DM policy relating to Heritage Assets and their Settings. There are no impact pathways present.</p>
PL12 Advertisements	Provides DM Policy relating to Advertisements	<p>No HRA implications. A DM policy relating to Advertisements. There are no impact pathways present.</p>
H1 Housing Allocations	<p>Provides support for Strategic Housing sites and other housing sites allocated within the Strategic polices. Development of the Strategic Housing Site will require a Master Plan to be submitted which takes into consideration the relevant policies in the Local Plan.</p>	<p>No HRA implications. A DM policy supporting housing provision. This policy does not itself provide for any quantum or location of housing development, as such there are no linking impact pathways present.</p>
H2 Residential Development	Supports residential development including infill development, the sub-division of garden plots, minor redevelopment schemes and the development of vacant plots provided it meets criteria listed	<p>No HRA implications. A DM policy providing criteria which residential development is required to</p>

		meet. Whilst the type of residential development supported by this policy could result in an increase in population. However, this policy does not identify any quantum or location of development and as such there are no linking impact pathways present.
H3 Houses in Multiple Occupation	Supports the creation or conversion of a dwelling to a House in Multiple Occupation (HMO) provided it meets criteria stated.	No HRA implications. A DM policy providing criteria which creation or conversion of HMO must meet. Whilst the type of residential development supported by this policy could result in an increase in population, it is likely that this increase will be small. Additionally this policy does not identify any quantum or location of development and as such there are no linking impact pathways present.
H4 Loss of Housing	Provide criteria where loss of housing will be supported.	No HRA implications. A DM policy providing criteria where loss of housing will be supported. There are no linking impact pathways present.
H5 Accessible and Adaptable Housing	Identifies requirements relating to accessible and adaptable housing including the need to provide at least Building Control Part M4(2), Building Control Part M4(3) and The provision of specialist housing developments will be supported on appropriate sites that will meet the needs of older people and other such groups.	No HRA implication. A DM policy relating to accessible and adaptable housing. Whilst the type of residential development supported by this policy could result in an increase in population, it is likely that this increase will be small. This policy does not identify any quantum or location of development and as such there are no linking impact pathways present.
H6 Housing Mix	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.	No HRA implications. A DM policy relating to housing mix. There are no linking impact pathways present.

<p>H7 Residential Annexes</p>	<p>Provision for a domestic annex will be supported where it meets criteria listed.</p>	<p>No HRA implication. A DM policy relating to residential annexes. Whilst the type of residential development supported by this policy could result in an increase in population this policy does not identify any quantum or location of development and as such there are no linking impact pathways present.</p>
<p>H8 Affordable Housing</p>	<p>Major residential development will be supported where affordable housing is provided at a rate of at least 30%. Reduction of this rate will require an independent viability assessment.</p>	<p>No HRA implications. A DM policy relating to affordable housing. There are no linking impact pathways present.</p>
<p>H9 Self-build and Custom-build Housing</p>	<p>Provides criteria under which self/ custom build housing plots should be made available. It also provides criteria relating to the provision of self build housing</p>	<p>No HRA implication. A DM policy relating to custom and self build housing. Whilst the type of residential development supported by this policy could result in an increase in population this policy does not identify any quantum or location of development and as such there are no linking impact pathways present.</p>
<p>H10 Travellers' Pitches and Plots</p>	<p>If evidence indicates there is a need for additional pitches or plots, new sites will be supported providing criteria listed are met.</p>	<p>No HRA implication. A DM policy relating to Traveller's Pitches and Plots. Whilst the type of residential development supported by this policy could result in an increase in population, this policy does not itself identify any quantum or location of development and as such there are no linking impact pathways present.</p>
<p>PR1 Development within Employment Areas</p>	<p>Supports development in employment areas provided it is for: B1 (Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area); B2 (General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste)); and B8 (Storage or distribution). Provides criteria under which other</p>	<p>No HRA implications A DM policy relating to development within employment areas. Whilst this policy supports development, no type, quantum or location is identified.</p>

	types of development will be supported	There are no linking impact pathways present.
PR2 Development within Neighbourhood Service Areas	Supports development in Neighbourhood Service Areas (NSA) provided it meets criteria. This includes: the provision of offices, light industrial uses and start-up units falling within use class B1; it is for uses other than B1 and evidence has been provided to demonstrate that the unit 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 realistic prospect of B1 uses occupying the unit or any other more suitable alternative sites being available for the proposal; and/ or it does not involve the amalgamation of units in Neighbourhood Service Areas into larger units and meets other criteria	No HRA implications. A DM policy relating to development within NSAs. This policy does not identify any location, type or quantum of development. There are no linking impact pathways present.
PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas	Employment development outside Employment Areas and Neighbourhood Service Areas will be supported where it meets criteria. Development resulting in the loss of B1, B2, B8 and waste uses will not be supported outside of the district's Employment Areas and Neighbourhood Service Areas unless it meets criteria identified	No HRA implications. A DM policy relating to development outside of NSA and Employment Areas. This policy does not identify any location type or quantum of development. There are no linking impact pathways present.
PR4 Improving Job Access and Training	For major development, provision through planning obligations will be sought for: 1. employment of local people; 2. work related training provision; 3. education opportunities; 4. affordable childcare.	No HRA implications A DM policy to relating to improving job access and training. There are no linking impact pathways present.
PR5 The Sequential Test and Principles for Main Town Centre Uses	A DM Policy providing criteria concerning the Sequential Approach to Main Town Centre Uses and the General Principles for Main Town Centre Uses	No HRA implications. A DM Policy providing the Sequential Approach to Main Town Centre Uses and the General Principles for Main Town Centre Uses. There are no linking impact pathways present.
PR6 Primary and Secondary Frontages in the Town Centre	A DP policy providing criteria where development in the Town Centre primary frontages will be supported and that Main Town Centre Uses (with the exception of office uses), evening and night-time uses will be supported in the Town Centre secondary frontages.	No HRA implications A DM Policy relating to development of Primary and Secondary Town Centre frontages. There are no linking impact pathways present.

<p>PR7 Sub-division and Internal Alteration of Town Centre Units</p>	<p>The sub-division of retail units in the Town Centre and the internal alteration of existing retail units will be supported where both the criteria listed are met.</p>	<p>No HRA implications A DM policy relating to the sub-division and internal alteration of Town Use units. This policy does not identify and type, location or quantum of development. There are no linking impact pathways present.</p>
<p>PR8 Primary and Secondary Frontages in Neighbourhood Centres</p>	<p>Provides criteria where development of Primary and Secondary frontages in Neighbourhood Centres will be supported.</p>	<p>No HRA implications. A DM policy providing criteria where development of Primary and Secondary frontages in Neighbourhood Centres will be supported. There are no linking impact pathways present.</p>
<p>PR9 Development in Hatches</p>	<p>Development in Hatches will be supported where it meets both the following criteria: (a) development at ground floor level falls within use classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments), A5 (hot food takeaways), D1 (non-residential institutions) or D2 (assembly and leisure) or a mix of these uses and does not result in the loss of all convenience facilities, public houses and community facilities; and (b) development on the first floor or above falls within use classes B1(a) (business) or C3 (dwelling houses).</p>	<p>No HRA implications. A DM policy concerning development in Hatches. This policy does not identify any location, type or quantum of development. There are no linking impact pathways present</p>
<p>PR10 Development in Retail Parks</p>	<p>Provides criteria under which the Council will support development in retail parks. For sub-division, evidence must be provided to demonstrate that the existing unit has been actively marketed, to the satisfaction of the Council, for at least twelve months.</p>	<p>No HRA implications. A DM policy relating to development in Retail Parks. This policy does not identify any location, type or quantum of development. There are no linking impact pathways present.</p>
<p>PR11 Evening and Night Time Economy</p>	<p>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 will be supported where they meet criteria detailed</p>	<p>No HRA implications. A DM policy relating to the evening and night time economy. There are no linking impact pathways present.</p>

<p>L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development</p>	<p>In major development, public open space, allotments, play space and sporting provision and facilities are to be required, together with their management and maintenance.</p>	<p>No HRA implication. A positive DM policy identifying the need for major development to provide public open space and other outdoor amenities which have the potential to divert recreational activity away from sensitive designated sites. There are no linking impact pathways present.</p>
<p>L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities</p>	<p>Provides criteria where the provision of recreational, sporting, cultural and community uses and/or facilities, including playing fields, play spaces, allotments and sports clubs will be supported. Identifies that the loss of all or part of any recreation, sports, cultural or community uses and/or facilities will not be supported unless it meets one or more of the criteria listed</p>	<p>No HRA implications. A DM policy relating to the provision and loss of recreational, sporting, cultural and community facilities. It is noted that the provision of recreational facilities has the potential to reduce recreational pressure on sensitive designated sites, whilst the loss of it could increase recreational pressure. However, no location or extent of development gain/ loss is identified. There are no linking impact pathways present.</p>
<p>L3 Development Involving the Provision or Relocation or Loss of Public Art</p>	<p>1. Provision of Public Art in Major Developments In major developments, public art should be provided. 2. Development Involving the Provision, Relocation or Loss of Public Art The commissioning, maintenance and de-commissioning of public art must be agreed with the Council.</p>	<p>No HRA implications. A DM policy concerning public art. There are no linking impact pathways present.</p>
<p>IN1 Development and Sustainable Modes of Travel</p>	<p>1. Sustainable Accessibility All development should have regard to the modal hierarchy as set out in the Strategic policies. New developments including redevelopments, changes of use and Town Centre and transport interchange improvements will be required to link to the existing cycleway, footway, public right of way and bridleway network. Where appropriate this will include cycleways, footways and bridleways within the development, and contribute to the improvement of these facilities 2. Provision of Electric Charging Points for Vehicles Development must provide electric vehicle charging points (EVCPs) in accordance with the latest government guidance.</p>	<p>No HRA implications. A positive DM policy providing for the inclusion of sustainable transport modes including cycleways, footpaths and bridleways and the provision of EVCPs. These provisions have the potential to reduce the need for use of polluting vehicles and reduce atmospheric pollution contributions. There are no linking impact pathways present</p>

<p>IN2 Impact of Development on the Highways Network including Access and Servicing</p>	<p>Development will be supported where it meets all the following criteria: (a) it would not cause a significant detrimental impact on road congestion and movement; (b) it would not cause a detrimental impact on the safety of all road users including pedestrians and cyclists; and (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.</p>	<p>No HRA implications. A DM policy relating to the impact of development on the Highways Network. This policy does not identify any location or type of development. There are no linking impact pathways present.</p>
<p>IN3 Parking Standards</p>	<p>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.</p>	<p>No HRA implications. A DM policy associated with parking standards. There are no linking impact pathways present</p>
<p>IN4 Broadband and Development</p>	<p>1. Broadband Provision in Major Development Major development should contribute towards the provision of infrastructure suitable to enable the delivery of high-speed broadband services across the Harlow area. 2. Broadband Infrastructure Development Broadband infrastructure development will be supported where a report is submitted which meets criteria including that pertinent to adverse impacts on the natural built environment.</p>	<p>No HRA implications. A positive DM Policy associated with broadband provision and development. This policy has the potential to reduce the need for journeys and as such could reduce atmospheric pollution contributions. There are no linking impact pathways present.</p>
<p>IN5 Telecommunications Equipment</p>	<p>Development of telecommunications equipment will be supported where it meets both the following criteria: (a) evidence has been provided to show that opportunities have been explored to share existing masts or sites with other providers; and (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</p>	<p>No HRA implications. A DM policy associated with telecommunications equipment. No location or type of development is identified. There are no linking impact pathways present.</p>
<p>IN6 Planning Obligations</p>	<p>Planning permission will only be granted for development if the provision is secured for related infrastructure, affordable housing, services, facilities and environmental protection 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</p>	<p>No HRA implications. A DM policy associated with Planning Obligations. There are no linking impact pathways present.</p>

	<p>provision on site is not feasible then provision elsewhere, or a 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>	
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4.2 **Table 4** identifies that LDP policies provide potential linking impact pathways to European sites. These policies are:

- 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
- HS4 Gypsies and TravellersED1 Future Employment Floorspace
- ED4 Developing a Visitor Economy
- RS2 Future Retail Floorspace
- WE1 Strategic Green Infrastructure
- PL5 Other Open Spaces

4.3 Potential linking impact pathways identified include:

- Disturbance from recreational activities (Lee Valley SPA and Ramsar site and Epping Forest SAC)
- Atmospheric pollution (Epping Forest SAC)
- Water abstraction (Lee Valley SPA and Ramsar site)
- Water quality (Lee Valley SPA and Ramsar site)

4.4 These impact pathways are discussed further in relation to Epping Forest SAC, and Lee Valley SPA and Ramsar site in **Chapters 5 to 8**.

Screening of Site Allocations

- 4.5 **Table 5** presents an initial sift of Residential Site Allocations within the LDP from the point of view of HRA, whilst **Table 6** represents the initial sift of Employment Site Allocations.
- 4.6 Where Site Allocations have been coloured green in the ‘HRA Screening Implications’ column, this indicates that the Allocations do not contain potential impact pathways linking to European designated sites and have been screened out from further consideration. Where Site Allocations have been coloured orange in the ‘HRA Screening Implications’ column, this indicates that the Site Allocations have potential impact pathways linking to European sites and have been screened in for further consideration in this report.
- 4.7 For Residential and Traveller Site Allocations, impacts relating to recreational pressure in combination have been screened out for Allocations located more than 6.2km from Epping Forest SAC or Lee Valley SPA and Ramsar site. The reasoning for these distances is discussed in Chapter 5.

Table 5: Screening Assessment of Residential Site Allocations

Site Allocation Reference	Site Allocation Name	Capacity	Distance from Epping Forest SAC	Distance from Lee Valley SPA/ Ramsar	HRA implications
HS2-1	Princess Alexandra Hospital	650	More than 7km from Epping Forest SAC	Located less than 6km (between 4km and 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-4	Lister House, Staple Tye Mews, Staple the Depot and The Gateway Nursery	42	More than 7km from Epping Forest SAC	Less than 6km from Lee Valley SPA/ Ramsar	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-6	Ridding Lane	35	Between 6km and 7 km from Epping Forest SAC	More than 7km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.
HS2-7	Kingsmoor Recreation Centre	35	Between 6km and 7 km from Epping Forest SAC	Located less than 6km from Lee Valley SPA/ Ramsar (4.9km)	Potential HRA implications Located within an area of existing recreational land associated with Kingsmoor Recreation Centre. Freely available online mapping indicates that this land is used for recreational activities that have the potential to divert recreational pressure away from sensitive designated sites. Loss of this land could result in increased recreational pressure. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.

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Site Allocation Reference	Site Allocation Name	Capacity	Distance from Epping Forest SAC	Distance from Lee Valley SPA/ Ramsar	HRA implications
HS2-8	The Evangelical Lutheran Church, Tawneys Road	35	More than 7km from Epping Forest SAC	More than 6km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.
HS2-9	Land east of 144-154 Fennells	23	6.1km from Epping Forest SAC	Located less than 6km (although more than 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications This land parcel is located adjacent to Kingsmoor Recreation Ground and Parndon Wood Nature Reserve. It is 6.1km from Epping Forest SAC. From review of freely available online mapping, imagery identifies that this land parcel is part of the Nature reserve. The imagery also indicates that the site is used for recreational activities. As such, the loss of this land parcel could result in increased recreational pressure within sensitive designated sites. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar site and Epping Forest SAC is a potential linking impact pathway
HS2-10	Pollard Hatch plus garages and adjacent land	20	More than 7km from Epping Forest SAC	Located less than 6km (between 4km and 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-11	Land between Second Avenue and St. Andrews Meadow	16	More than 7km from Epping Forest SAC	More than 6km from Lee Valley SPA/ Ramsar	This allocation is located in a land parcel that from review of freely available online mapping appears to be used as recreational green space connecting Netteswell Pond and the Recreation Ground. Loss of this land could result in increased recreational pressure. However, due to the distance of this site from designated sites, it is considered that this site can be screened out.
HS2-12	Coppice Hatch and garages	16	More than 7km from Epping Forest SAC	Located less than 6km (although more than 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-13	Sherards House	15	More than 7km from Epping Forest SAC	Located less than 6km (between 4km and 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-14	Elm Hatch and public house	13	More than 7km from Epping Forest SAC	Located less than 6km (between 4km and 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-15	Playground west of 93	12	More than 7km	More than 8km from	Due to the distances involved there are no linking impact pathways

Site Allocation Reference	Site Allocation Name	Capacity	Distance from Epping Forest SAC	Distance from Lee Valley SPA/ Ramsar	HRA implications
	- 100 Jocelyns		from Epping Forest SAC	Lee Valley SPA/ Ramsar	present. This site can be screened out.
HS2-16	Fishers Hatch	10	More than 7km from Epping Forest SAC	More than 6km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.
HS2-17	Slacksbury Hatch and associated garages	10	More than 7km from Epping Forest SAC	Located less than 6km (between 4km and 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-18	Garage blocks adjacent to Nicholls Tower	10	More than 7km from Epping Forest SAC	More than 7km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.
HS2-19	Stewards Farm	10	More than 6.2km from Epping Forest SAC	More than 6km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.
HS2-20	Land between Barn Mead and Five Acres	10	More than 7km from Epping Forest SAC	Partially located less than 6km from the SPA/ Ramsar (3.9km)	Potential HRA implications. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway.
HS2-21	Pypers Hatch	10	More than 7km from Epping Forest SAC	More than 6km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.
HS2-2	The Stow Services Bays	70	More than 7km from Epping Forest SAC	More than 6km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.
HS2-3	Land east of Katherines Way, west of Deer Park	69	More than 7km from Epping Forest SAC	Located less than 6km (between 4km and 5km) from Lee Valley SPA/ Ramsar	Potential HRA implications This allocation is located in a land parcel that from review of freely available online mapping appears to be used as recreational green space. Loss of this land could result in increased recreational pressure. Due to the distances involved recreational pressure on Lee Valley SPA/Ramsar is a potential linking impact pathway
HS2-5	Land, south of Clifton Hatch	36	More than 7km from Epping Forest SAC	More than 7km from Lee Valley SPA/ Ramsar	This allocation is located in a land parcel that from review of freely available online mapping appears to be used as recreational green space. Loss of this land could result in increased recreational pressure.

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Site Allocation Reference	Site Allocation Name	Capacity	Distance from Epping Forest SAC	Distance from Lee Valley SPA/ Ramsar	HRA implications
					However, due to the distance of this site from designated sites, it is considered that this site can be screened out.
HS3	Strategic Housing Site East of Harlow	2,600	More than 9km from Epping Forest SAC	More than 9km from Lee Valley SPA/ Ramsar	Due to the distances involved there are no linking impact pathways present. This site can be screened out.

4.8 **Table 5** identifies Residential Site Allocations that are located within 6km of Lee Valley SPA and Ramsar site and as such cannot be screened out due to the potential linking impact pathway of recreational pressure. These are: HS2-1, HS2-4, HS2-7, HS2-9, HS2-10, HS2-12, HS2-13, HS2-14, HS2-17, HS2-20, and HS2-3. Additionally, four of these sites are located within parcels of land that appear to be currently used for recreational activity, so loss of these could exacerbate an increase of recreational pressure within a sensitive European site. In contrast, only one housing allocation is located within 6.2km of Epping Forest SAC.

Table 6: Screening Assessment of Employment Site Allocations

Allocation Ref.	Allocation name	Employment Area	HRA Screening Implications
ED1-01	Harlow Business Park, The Pinnacles	4.6ha	No HRA implications Located 3km from Lee Valley SPA/ Ramsar and more than 9km from Epping Forest SAC. Can be screened out in isolation
ED1-02	London Road	14.2ha	No HRA implications Located more than 7km from Lee Valley SPA/ Ramsar and more than 9km from Epping Forest SAC. Can be screened out in isolation
ED1-03	East Road, Templefields	2.2ha	No HRA implications Located 7km from Lee Valley SPA/ Ramsar and more than 10km from Epping Forest SAC. Can be screened out in isolation

4.9 Screening of the Employment Site Allocations undertaken in **Table 6** does not identify any potential impact pathways linking to European sites beyond in combination affects relating to changes in air quality as a result of increase traffic movement resulting from development provided by the LDP.

5. Recreational Pressure

5.1 The following LDP Policies could not be dismissed in the initial sift from potentially impacting the integrity of the Lee Valley SPA and Ramsar site as a result of increased recreational pressure affects. These LDP Policies are therefore discussed further in this Chapter:

Policies

- HS1 Housing Delivery: provides for 9,200 new dwellings between 2011 to 2033
- HS3 Strategic Housing Site East of Harlow – screen in and then dismiss later as it lies outside core catchment.
- 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

5.2 Residential site allocations provided by the Plan include land parcels that from review of freely available online imagery appear to be currently used as publically 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

5.3 Loss of these recreational spaces could increase recreational pressure on sensitive European sites. However, due to the distances involved (see **Table 5** for distances of individual site allocations from European sites; the closest allocation to a European site is HS2-3: Land east of Katherines Way, west of Deer Park located 4.3km from Lee Valley SPA and Ramsar site) it is unlikely that people displaced from HS2-3: Land east of Katherines Way, west of Deer Park would choose the European site as an alternative. This impact pathway can be screened out alone.

5.4 Policy L2 (The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities) is a DM policy relating to the provision and loss of such facilities. The provision of recreational facilities has the potential to reduce recreational pressure on sensitive designated sites, whilst the loss of it could increase recreational pressure. However, loss of recreational facilities will only be supported under certain criteria including where:

‘(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;

(d) the development would redress the deficiency of other recreational provision within the locality.'

- 5.5 With this policy framework in place it can be concluded that the loss of the above mentioned recreational spaces will not result in a net loss of usable recreational provision and this impact pathway relating to loss of recreational amenity can be screened out.

Positive Policy Provision

- 5.6 It is noted that the Plan includes positive policies that have the potential to reduce recreational pressure on sensitive European sites. These are:
- WE1 Strategic Green Infrastructure: provides for the protection and enhancement of existing green infrastructure and that new GI '**must be planned into new development**'.
 - WE2 Green Wedges and Green Fingers: provides for green Wedges and Green Fingers. The role of Green Wedges and Fingers are to '*...provide Green Infrastructure, including open spaces for sport, recreation and quiet contemplation, wildlife corridors, footpaths, cycleways and bridleways;...*'
 - PL7 Green Infrastructure and Landscaping: provides for the protection and enhancement of GI.
 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development: identifies the need for '*major development*' to provide public open space and other outdoor amenities which have the potential to divert recreational activity away from sensitive designated sites.
 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities: a DM policy relating to the provision and loss of recreational, sporting, cultural and community facilities. It is noted that the provision of recreational facilities has the potential to reduce recreational pressure on sensitive designated sites, whilst the loss of it could increase recreational pressure. Loss of recreational facilities will only be supported under certain criteria.
- 5.7 Due to the distances from Harlow to sensitive European sites (the nearest site to Epping Forest SAC is HS2-9: Land east of 144-154 Fennells located 6.1 km away, whilst the nearest to Lee Valley SPA and Ramsar site is HS2-3: Land east of Katherines Way, west of Deer Park located 4.3km away), individual residential site allocations in Harlow are unlikely to result in an impact due to increased recreational pressure alone. As such only in combination assessment is required in relation to impacts from increased recreational pressure and that is the subject of the remainder of this chapter.

Lee Valley SPA and Ramsar Site (In Combination)

5.8 The following SSSI's are components of the SPA and Ramsar site:

- Rye Meads SSSI is the closest component of the European site to Harlow. It is located approximately 2.6 km west of the District. The site is a Nature Reserve and is owned by Thames Water and the RSPB who manage the site with Hertfordshire and Middlesex Wildlife Trust.
- Amwell Quarry SSSI is located 4km north west of the District. The site is a National Nature Reserve. It is owned and managed by Herts and Middlesex Wildlife Trust.
- Turnford & Cheshunt Pits SSSI is located more than 7km south west of the District. Most of the site is owned by the Lee Valley Regional Park Authority and is managed as a Country Park (River Lee Country Park).

5.9 At its closest Harlow district is located 2.6km from Lee Valley SPA and Ramsar site (Rye Meads), although the closest residential site allocation (HS2-3: Land east of Katherines Way, west of Deer Park, allocated for 69 dwellings) is located 4.3km from the European site. Visiting Rye Meads from Harlow is convoluted (rather than via a simple measure of 'as the crow flies') due to the intervening railway line and River Stort and the existence of a toll on Rye Road⁵⁷. As such, the toll-free route requires one to drive north onto the A414, west along the A414 and then south into Hoddesdon to reach the reserve.

5.10 This analysis considers that recreational pressure effects on this site from development in Harlow are unlikely to be significant even 'in combination' for the following reasons:

- Amwell Quarry SSSI (Amwell Nature Reserve) and Rye Meads SSSI (Rye Meads Nature Reserve) are both laid out in considerable detail with a network of hides (ten at Rye Meads, three at Amwell) and clearly marked footpaths/boardwalks with screening vegetation that are specifically laid out and designed to route people away from the sensitive areas and minimise disturbance while at the same time accommodating high numbers of visitors. Additionally, no dogs are allowed (except registered assistance dogs) and the wet and marshy/open water nature of the habitats on site inherently limits off-track recreational activity, rendering it difficult to accomplish and unappealing. For these reasons it is considered that the vulnerability of Amwell Nature Reserve and Rye Meads Nature Reserve to the potential adverse effects of recreational activity that can affect other less well-managed sites is very low. In Turnford and Cheshunt Pits SSSI, recreational activity is similarly regulated through zoning of water bodies. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority.
- Gadwall and shoveler are the most widely distributed and numerous faunal species for which the SPA and Ramsar site are designated and thus the most likely to encounter visitors). These species are not inherently highly sensitive to disturbance and are readily able to adapt (habituate) to the presence of shore-based human recreational activities without being flushed (as opposed to water-based activities which are potentially highly disturbing).
- Turnford & Cheshunt Pits is located within the Lee Valley Country Park, which is part of the Lee Valley Regional Park. In their response to the HRAs for Epping Forest Local Plan and East Herts Local Plan the Lee Valley Regional Park Authority did not raise any concerns regarding ability to manage future recreational pressure on the SPA from growth.

⁵⁷ Although the toll is modest (currently £0.5) it is nonetheless likely to discourage casual visitors from regularly using that route.

- Various investigations into the habits of recreational visitors to nationally and internationally important wildlife sites have found that the majority of dog walkers and casual walkers are generally disinclined to walk very far to visit sites for recreation. For example, in one of the most thorough studies visitor surveys were conducted at the Thames Basin Heaths Special Protection Area. The study found that the average distance between the visitor's home postcode and Thames Basin Heaths SPA when arriving by foot was 0.8 km, with 75% of foot-based visitors living within a 0.9 km straight line distance from the visitor survey point. Other surveys show a similar broad pattern, since there is a natural limit as to how far most people are prepared to walk to visit a particular countryside site, even when it is large and appealing. As identified above the nearest site allocation to the SPA in Harlow is more than 4km distant. The Thames Basin Heaths is also extensively visited by people travelling by car, who typically live 5km from the SPA. However, that site has an abundance of parking whereas parking in the vicinity of Rye Meads, Turnford & Cheshunt Pits and Amwell Quarry will naturally restrict the number of car-based visitors at any time and, unlike Epping Forest SAC, opportunities for informal roadside verge parking are very limited.

5.11 As such it is considered that development provided by the LDP will not affect the integrity of the Lee Valley SPA and Ramsar site via increased recreational pressure alone or in combination.

Epping Forest SAC (In Combination)

- 5.12 Epping Forest SAC receives a great many visits per year (estimated at over 4 million) and discussions with the City of London Corporation have identified long-standing concerns about increasing recreational use of the forest resulting in damage to its interest features. A programme of detailed formal visitor surveys has been undertaken and has identified that 75% of visitors to Epping Forest SAC arise from within approximately 6km (6.2km) of the site. This is relevant because the 75th percentile is often used to define the core recreational catchment of a European site. Within that 6.2km zone visitors are not evenly spread; the vast majority of Essex-resident visitors live within 3km of the SAC with few living further afield; the 6.2km distance appears to be influenced particularly by residents to the south of the SAC in north London who are dispersed over a wider area.
- 5.13 The updated survey will inform a formal Mitigation Strategy and a more refined assessment of impacts and mitigation solutions will be required within the scope of the strategic commitment that all the HMA authorities have made in a Memorandum of Understanding (MoU) between the HMA authorities and Essex County Council, Hertfordshire County Council, Natural England and the City of London Corporation.
- 5.14 However, it can be seen that, based on the visitor survey report, only one residential site allocation proposed in the Harlow Local Plan is located within 6.2km of the SAC. This is site HS2-9: Land east of 144 – 154 Fennells, allocated for 23 dwellings, and is located 6.1km from the SAC boundary at its closest. Based on current data therefore, all but one of the Local Plan allocations are located beyond the indicated core recreational catchment for Epping Forest SAC and even that site is located on the periphery of the recreational catchment of the SAC. The vast majority of Harlow District within 6.2km of the SAC consists of greenspace and woodland with no housing development, and this is unlikely to change.
- 5.15 Notwithstanding the distance of Harlow District and its allocations from Epping Forest SAC, the Council have signed up to delivering the HMA-wide commitment set out in the Epping Forest SAC Memorandum of Understanding to collaboratively devise strategic mitigation solutions (such as access management contributions and, alternative recreational natural greenspace as necessary). This commitment is also detailed within the Plan as follows: '1.31: ...Additionally, a MoU has been prepared, focussing on the management of growth from development on the Epping Forest Special Area of Conservation. For robustness and clarity

with regard to recreational pressure on Epping Forest SAC and the commitment of the Council to work collaboratively to protect the site from adverse effects on integrity, it was recommended in an earlier draft of this HRA that paragraph 1.31 be amended to state: ‘... *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 integrity of the SAC*’ in order to reflect the explicit objective of the management of growth (i.e. prevention of adverse effects on the SAC). For the submitted version of the LDP this change has been made.

- 5.16 Whilst the LDP itself only provides for 9,200 new dwellings over the Plan period, the wider HMA provides for 51,710 new dwellings between the four Districts of East Hertfordshire, Epping Forest, Uttlesford and Harlow to 2033. Most of the larger housing allocations located outside of Harlow District (i.e. the garden communities) are located on the outskirts of Harlow under a Memorandum of Understanding (MoU)⁵⁸. As such it is recommended that Harlow is rendered effectively recreationally ‘self-sufficient’ to help to minimise impacts from increased recreational pressure stemming from the LDP to assist the neighbouring authorities deliver the quantum of housing in close proximity to Harlow. Policy WE1 Strategic Green Infrastructure does identify 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 which could be achieved through a green infrastructure strategy⁵⁹. Ultimately the quantum of Green Infrastructure required and achievable will be dependent on the layout of these larger developments and detail will need to be established for individual planning applications⁶⁰. Further mitigation measures may be devised for these sites as the strategic recreational management strategy for the SAC develops.
- 5.17 It is concluded that the recreational pressure impact pathway can be screened out in isolation and in combination, firstly because available data suggests that Harlow is likely to lie on the fringes of the core catchment of the SAC and secondly because there is a framework in place via both the MoU and a Local Plan commitment to manage the effects of growth on Epping Forest SAC collaboratively with the other MoU authorities.

⁵⁸ Memorandum of Understanding on Distribution of Objectively Assessed Housing Need Across the West Essex/ East Hertfordshire Housing Market Area (March 2017) Between East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council.

⁵⁹ It is noted that the Gilston Area Concept Framework (September 2016) provides Aspirational Objectives including to ‘*Create major publically accessible parklands, as well as extensive hard and soft landscaping within the villages. Every house within 300m of open space;*’

⁶⁰ The use of Natural England’s ANGST standards would be a good starting point in determining a quanta of green infrastructure required.

6. Air Quality

6.1 Due to the large distances involved, it is considered 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 require further consideration. The following policies could not be dismissed in the initial sift (see **Table 4**) from potentially impacting the integrity of Epping Forest SAC, as a result of increased atmospheric pollution contributions. Therefore further discussion is contained in this Chapter.

Policies

6.2 The key drivers for potential increased atmospheric pollution as a result of the LDP stem from increased residential development (approximately 9,200 dwellings), and increased employment development (approximately 18.8ha of floorspace). Additionally, and to a lesser extent, an increased visitor economy has the potential to increase road traffic within Harlow District and possibly more widely. This is considered in the context of an additional 51,710 net new dwellings identified to be provided in Harlow, Uttlesford, East Hertfordshire and Epping Forest Districts under the HMA. This type of development is provided within the following Plan 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
- RS2 Future Retail Floorspace

6.3 In addition to those policies which promote delivery of development, the following policies within the Plan that provide a positive contribution to atmospheric improvements:

- HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Communities: this policy provides positive provision to ‘(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 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*’.
- HS3 Strategic Housing Site East of Harlow: provides positive provision of ‘*footpaths, cycleways and bridleways*’ that could lead to a reduction in atmospheric pollution contributions
- PL3 Sustainable Design, Construction and Energy Usage: provides for efficient energy use. This has potential to reduce atmospheric pollution contributions. ‘*New development will be expected to deliver high standards of sustainable design and construction and efficient energy usage...*’
- PL9 Pollution and Contamination: identifies the need to for all development proposals to ‘*minimise and where possible reduce all forms of pollution*’ and that development will not be supported if it will result in unacceptable impacts from pollutants (alone or in combination).

It also identifies for the need for mitigation where pollution and contamination are unavoidable.

- IN1 Development and Sustainable Modes of Travel: providing for the inclusion of sustainable transport modes including cycleways, footpaths and bridleways and that *'Development must provide electric vehicle charging points (EVCPs) in accordance with the latest government guidance'*. These provisions have the potential to reduce the need for use of polluting vehicles and reduce atmospheric pollution contributions.
 - IN4 Broadband and Development: provision of broadband infrastructure has the potential to reduce the need for journeys and as such could reduce atmospheric pollution contributions.
- 6.4 Supporting text also provides for a modal shift in transport types used during the Plan period as follows: *'5.16... Aspirations include a modal travel shift towards 60% by sustainable modes of transport and 40% car-based.'*
- 6.5 Within the context of these LDP policies and supporting text, air quality on each European site is discussed below.

Epping Forest SAC

Likely Significant Effects

- 6.6 Epping Forest SAC is known to be adversely affected by relatively poor local air quality alongside the roads that traverse the SAC and this has been demonstrated to have negatively affected the epiphytic lichen communities of the woodland. The nature of the road network around Epping Forest SAC is such that journeys between a number of key settlements around the Forest by car, van or bus effectively necessitate traversing the SAC. Modelling undertaken for the West Essex/East Hertfordshire Housing Market Area authorities (which Harlow District is part of) in 2016 (see **Appendix C** for full detail) indicates that even on B roads through the SAC vehicle flows are substantial (e.g. a 2014 base case of c.20,000 AADT on the B1393 with roadside NO_x concentrations of 60µg^m⁻³, twice the critical level) while the A121 between Wake Arms Roundabout and the M25 had 2014 base flows of 25,000 AADT. Moreover, lengthy queues are known to build around most arms of Wake Arms Roundabout, which increases emissions compared to the same volume and composition of free-flowing traffic.

Appropriate Assessment

- 6.7 The critical level for NO_x is set at 30 µg^m⁻³ in order to capture the role of NO_x in nitrogen deposition, and particularly in growth effects. The critical level for NO_x is currently exceeded on most links indicating that existing traffic is likely to be making a meaningful contribution to nitrogen deposition and the 2016 modelling indicated that the critical level was likely to continue to be exceeded on most links by 2033. Since the principal role of NO_x on vegetation is as a source of nitrogen, nitrogen deposition rates were forecast in order to examine the potential effect directly.
- 6.8 Comparing Do Something with Base in each table in **Appendix C**, it can be seen that the 2016 modelling forecast a net improvement in both NO_x concentrations and nitrogen deposition on the modelled links over the period to 2033 even allowing for forecast growth in traffic due to all sources. In other words the scale of improvement was forecast to more than offset any additional emissions from the 'in combination' increase in road traffic. This net improvement was forecast even though the allowance made for such improvements in the 2016 modelling was considerably more conservative than that advised in Defra guidance. Comparing Do Something with Do Minimum (rather than Base) then enabled identification of the relative contribution of HMA growth to any retardation of that improvement. For nitrogen

deposition, the 2016 data indicated that the role of the HMA Local Plans in retarding the expected improvement was forecast to be very small.

- 6.9 For NO_x on all roads other than Theydon Road, there was forecast to be an increase in NO_x concentration up to 10-20m from the roadside (depending on link modelled) varying from 0.4 µgm⁻³ (1.3% of the Critical Level) at the furthest distance, up to a maximum of 1.5 µgm⁻³ (5% of the Critical Level) immediately adjacent to the A104. DMRB Interim Advice Note 174/13⁶¹ classifies this as a 'small' change (which it defines in line with Institute of Air Quality Management practice as a change equivalent to 5% of the critical level or less). Effects of NO_x that may arise other than through its role as a source of nitrogen could include biochemical effects e.g. enzyme activity, chlorophyll content and physiological effects e.g. CO₂ assimilation or stomatal conductivity, although many of these changes may still be due to increased nitrogen rather than other effects of the gas such as acidity.
- 6.10 Based on those studies, the physiological and biochemical effects of NO_x do not appear to occur until much higher annual concentrations are reached than those forecast 'in combination' at Epping Forest SAC. Even in epiphytic plants, no research has been sourced that indicates effects, other than via nitrogen, at lower concentrations. This is reflected in WHO (2000) which states that the '*general effect threshold ... would be substantially higher if biomass production [i.e. growth stimulation] of crops is not assumed to be an adverse effect*'. Reference to the data provided within the WHO report suggests that exposure to annual average concentrations below 100 µgm⁻³ are unlikely to cause direct biochemical or physiological effects based on the available studies and it may be that concentrations considerably above 100 µgm⁻³ would be required in the field before an effect was observed. From the tables above, the highest 'in combination' (Do Something) 2033 NO_x concentration predicted on the modelled links in 2016 was 56.5 µgm⁻³ immediately adjacent to the A121 between the Wake Arms Roundabout and the M25. This is certainly high enough for nitrogen deposition to be well above the minimum critical load but is well below the likely minimum NO_x concentration at which other effects, unrelated to growth stimulation and nitrogen deposition, are likely to occur.
- 6.11 Notwithstanding the results of the 2016 modelling, the authorities (highway authorities, Natural England and City of London Corporation, the HMA authorities including Harlow) recognised the uncertainties inherent in any forecasting, the absence of ammonia forecasts from the 2016 work (not a standard component of road traffic impact assessment, but specifically requested in this case) and the inability at the time the 2016 modelling was undertaken to factor in the effect of queuing traffic at Wake Arms Roundabout. They also recognised that the air quality on many links was still forecast to be higher than the critical level and critical load even allowing for the improvement attributable to changes in vehicle emissions. The authorities thus considered that it was appropriate for them to take active steps to minimise the increase in traffic flows and improve air quality, rather than rely entirely on the (inter)national initiatives such as improvements in emission factors.
- 6.12 As a result of that modelling and broader discussion with Natural England and City of London Corporation, the HMA authorities (including Harlow) agreed that a mitigation strategy be devised⁶². This commitment is also detailed within the Plan as follows: '*1.31: ...Additionally, a MoU has been prepared, focussing on the management of growth from development on the Epping Forest Special Area of Conservation. For robustness and clarity with regard to air quality and recreational pressure on Epping Forest SAC and the commitment of the Council to*

⁶¹ The Design Manual for Roads and Bridges (Interim Advice Note 174/13 Updated advice for evaluating significant local air quality effects for users of DMRB Volume 11, Section 3, Part 1 'Air Quality (HA207/07))

⁶² The MoU states that '*It is intended this Joint Strategy will be in agreed and published prior to the determination of any of the planning applications on sites around Harlow that are part of The Spatial Option detailed in the "Distribution of OAN across West Essex and East Hertfordshire" MoU. If the Joint Strategy is not in place when planning applications are submitted, applicants will be required to submit the necessary information to ascertain whether any adverse impacts will be caused in Epping Forest, and if necessary any mitigation measures that may be necessary.*

work collaboratively to protect the site from adverse effects on integrity, it was recommended in an earlier draft of this HRA that paragraph 1.31 be amended to state: '*... 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 integrity of the SAC*' in order to reflect the explicit objective of the management of growth (i.e. prevention of adverse effects on the SAC). For the submitted version of the LDP this change has been made.

- 6.13 Since that commitment was made governance arrangements are in place and traffic modellers have been working on potential traffic mitigation scenarios. These are shortly to be tested through updated air quality modelling, which will also take account of queuing traffic at Wake Arms Roundabout and ammonia emission from traffic. That modelling will supercede the modelling presented in this document. This HRA will therefore be updated in the light of new modelling to ensure it remains up to date. While development in Harlow District will have some influence on traffic flows through Epping Forest SAC, flows arising from local sources are likely to be influenced more by the quantum and distribution of additional housing and employment growth in local authorities closer to the SAC such as Epping Forest District and the London Boroughs of Waltham Forest and Redbridge.
- 6.14 A programme of long-term air quality monitoring is also about to commence within input from the City of London Corporation. This will be useful in air quality model verification but its main value will be in tracking the expected improvement in emissions over the plan period. This can feed into any regular reviews of housing/employment quantum and mitigation measures over the plan period.
- 6.15 The updating of traffic and air quality modelling and the testing and securing of specific mitigation measures will be an iterative process. Now that Harlow's precise site allocations are defined the strategic transport modelling should be updated to ensure that it reflects the latest distribution of housing. This should be an ongoing process following submission, to be completed prior to commencement of Examination. Although that work is ongoing, it is considered that the firm commitment by surrounding authorities (including Harlow) provided by the MoU and Local Plan references⁶³ to the development of mitigation strategies to address air quality around Epping Forest SAC and avoid an adverse effect on integrity, the commencement of work on those solutions, the development of a programme for devising and testing those strategies, and the authorities commitment to monitor the efficacy of those strategies put a sufficient framework in place to ensure no adverse effect arose on the integrity of the SAC in combination.
- 6.16 **In addition to the reference in the text of the plan, it is recommended that the Local Plan also provide explicit policy reference to the strategic framework in place to address air quality at Epping Forest, including specific reference to a multi-authority mitigation strategy and a timetable for the production of that strategy (e.g. prior to adoption). This will enable the Council to make contributions to the strategic mitigation that is proportionate to the Plans atmospheric pollution contributions.**
- 6.17 With the implementation of this recommendation, it is considered that the Plan and associated Council initiatives (such as the MoU and resulting mitigation strategies) would present a sufficiently robust framework to ensure that the Plan will not affect the integrity of sensitive European sites, although the detailed development of a mitigation strategy is ongoing.

⁶³ MoU on Managing the impacts of growth within the West Essex/ East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation (draft September 2016)

7. Water Abstraction

- 7.1 The following policies could not be dismissed in the initial sift from potentially posing likely significant effects upon the Lee Valley SPA and Ramsar site as a result of changes to water levels due to abstraction for public water supply. They are therefore discussed further in this Chapter:

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
- 7.2 Policies within the Plan do provide a positive contribution towards reducing the need for water supply as follows:
- PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems: provides for increased efficiency in water use, prevents development adversely affecting water quality, and provides for the use of SuDS.

Lee Valley SPA and Ramsar Site

- 7.3 All urban areas of Harlow District receive their potable water supply through Affinity Water within its Central Region. Within its catchment Affinity Water abstracts water from tributaries of Lee Valley SPA and Ramsar site.
- 7.4 The Lee Valley SPA and Ramsar site consists of four Sites of Special Scientific Interest (SSSI), of which Turnford and Cheshunt Pits SSSI, Rye Meads SSSI and Amwell Quarry SSSI all lie on the Hertfordshire/Essex border. Walthamstow Reservoirs SSSI lies within London Borough of Waltham Forest. Walthamstow Reservoirs is a sealed storage reservoir and part of the public water supply infrastructure for London. Rye Meads is unlikely to ever suffer from a shortage in water quantity due to its close relationship with Rye Meads Wastewater Treatment Works (WwTW). However, the quarries could theoretically be adversely affected if groundwater abstraction for public water supply was sufficiently great to cause drawdown of water levels.

- 7.5 The Water Cycle Study (WCS) undertaken to support the preparation of the Plan⁶⁴ identifies that within the Upper Lee Catchment Abstracts Management Strategy area water is only available for abstraction 10% to 11% of the time with the Environment Agency recommending water storage reservoirs to prolong water availability. The WCS states *'Across the Upper Lee CAMS area, water availability is very low, with abstraction tightly restricted. Recent actual abstractions have resulted in lower water levels than allocated for the environment (Ecological Flow Indicator, or EFI)... As a consequence, no further consumptive licences are available. New consumptive surface water abstractions will only be considered at times of very high flows, however these are infrequent in groundwater-fed watercourses.'*
- 7.6 The WCS recommends the following water management practices to increase water efficiency and manage demand:
- Testing the level of water efficiency before granting an abstraction licence,
 - Promoting efficient use of water,
 - Taking actions to limit the demand,
 - Reducing leakage; and
 - Embedding policies for low-water consumption design in new buildings into spatial plans.
- 7.7 Not all of these are within the remit of a Local Plan.
- 7.8 Affinity Water's current Water Resource Management Plan (WRMP)⁶⁵ covers the period up to 2040 and states that an HRA of the WRMP has been undertaken and that they have been able to demonstrate sufficient alternative supply options to ensure that adverse effects on European sites can be avoided. As such, it can be concluded that delivery of the Harlow LDP will not result in adverse effects on Lee Valley SPA and Ramsar site through excessive water drawdown, either in isolation or in combination.
- 7.9 Additionally Affinity Water is in the process of updating its WRMP. The Affinity Water Draft WRMP⁶⁶ covers the period from 2020 to 2080, with planned adoption in 2019. The Draft WRMP. It identified options to maintain the supply-demand balance. This includes metering, managing leakages, options relating to water efficiency, water re-use and the creation of new water storage facilities. The Draft WRMP concluded *'The WRMP demonstrates the pressures on water resources in the Affinity Water supply zones with increasing demand, population growth, resource uncertainty, the impacts of climate change and the need to reduce environmental impacts.'* However *'the overall RAG [Red / Amber / Green] assessment for Harlow water resources is green, on the basis that there is sufficient time to address the supply demand issues identified in the WRMP.'*
- 7.10 As such it is can still be concluded that the Harlow LDP will not result in adverse effects on Lee Valley SPA and Ramsar site through excessive water drawdown, either in isolation or in combination.

⁶⁴ JBA Consulting (2018) Harlow Council Water Cycle Study update (Draft Report)

⁶⁵ Affinity Water (2014) Final Water Resource management Plan, 2015-2040

⁶⁶ Affinity Water (2018) Draft Water Resources Management Plan.

https://www.affinitywater.co.uk/docs/Draft_Water_Resources_Management_Plan_2020-2080_March%202018.pdf [accessed 01/05/2018]

8. Water Quality

- 8.1 The following policies could not be dismissed in the initial sift from potentially posing likely significant effects upon the Lee Valley SPA and Ramsar site internationally designated sites as a result of changes to water quality from treated wastewater discharge. They are therefore considered further in this Chapter:

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
- 8.2 Policies within the Plan do provide a positive contribution towards good water quality as follows:
- PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems: This policy provides for increased efficiency in water use (*'no more than 110 litres per person per day'*), prevents development adversely affecting water quality, and provides for the use of SuDS.
 - HS3 Strategic Housing Site East of Harlow: This positive policy provision for the inclusion of partnerships with stakeholders including infrastructure providers and the provision of infrastructure in line with development delivery.
 - SIR1 Infrastructure Requirements: A positive DM policy relating to the delivery and timely provision of new infrastructure to support 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.'*

Lee Valley SPA and Ramsar Site

- 8.3 Change in water quality is the main pathway through which the Lee Valley SPA and Ramsar site could be adversely affected. The SPA and Ramsar site is located 2.6km from the Harlow District boundary, and as such impacts from run off are not feasible. However, Rye Meads consists of non-operational land at and around the Rye Meads WwTW. Parts of the SPA consist of open water but other parts consist of fen or marsh vegetation that would theoretically be susceptible to nutrient enrichment from treated wastewater.

- 8.4 'Poor fens' (i.e. acidic fens) are strongly nitrogen limited. In other words, nitrogen availability is the factor which ultimately controls vegetation response to other nutrients and a small change in nitrogen inputs can result in a major change in the vegetation composition. In contrast, other types of fen with a relatively alkaline pH (called 'rich' fens) such as those at Rye Meads are phosphorus-limited, meaning that phosphorus availability is the factor which ultimately controls vegetation response to other nutrients. This also applies to fluvial flood-plain grasslands like those at Rye Meads SSSI. In a phosphorus limited system, high nitrogen availability will not result in a deleterious effect on vegetation provided that phosphorus availability is controlled⁶⁷. That is not to say that nitrogen inputs would therefore be irrelevant, but it does mean that when nitrogen is already in excess (and phosphorus inputs can be controlled) a proportionate response must be made to the risk posed by small additional nitrogen inputs. Effluent discharges from Rye Meads WwTW into Tollhouse Stream. The stream flows through the SSSI and has been known to back up into the marsh grassland parts of the SSSI during periods of high flow.
- 8.5 The current discharge consent for Rye Meads WwTW has been subjected to a review by the Environment Agency and Thames Water (Review of Consents) specifically for the purpose of determining whether the current consented phosphorus limits on the discharge are leading to an adverse effect on the Lee Valley SPA and Ramsar site, and if so, to amend the consent in order to avoid such an effect. Additionally Rye Meads WwTW is undergoing an upgrade in treatment capacity and to improve discharge quality standards (up to 447,131 Population Equivalent) that is due for completion in 2018⁶⁸. As such, provided effluent from new development within the Rye Meads catchment can be accommodated within the existing volumetric discharge consent for the WwTW it can be concluded with confidence that an adverse effect on the SPA and Ramsar site is unlikely to occur from this pathway.
- 8.6 The Harlow WCS⁶⁹ undertook a headroom assessment of Rye Meads WwTW in relation to committed and planned future growth scenarios with Harlow and six neighbouring authorities (East Herefordshire, North Hertfordshire, Stevenage, Welwyn Hatfield, Epping Forest and Broxbourne). The catchment of Rye Meads WwTW is expected to accommodate growth within Harlow as well as a large portion of development within the neighbouring six authorities. The WCS states: the *'headroom assessment undertaken by JBA ... indicates that Rye Meads has capacity to accommodate growth within Harlow and surrounding authorities over the plan period, within the current permitted DWF discharge of 110 ML/d.*
- 8.7 *The TWUL RAG assessment classifies Rye Meads WwTW as "green". This reflects the existing WwTW capacity, as well as the treatment capacity of 447,134 Population Equivalent (PE) to be provided by planned upgrades to the WwTW within AMP Cycle 6 (2015 - 2020).'* Even up to the end of AMP9 (i.e. 2035) Rye Meads WwTW has been modelled to continue to have headroom (11% headroom capacity will remain). Additionally permitted levels of ammonia discharged can be managed (i.e. resulting in no deterioration) via the tightening of permits within technically possible limits.

⁶⁷ 'In a nutrient limited system, excess of the non-limiting nutrient may not result in any signs of enrichment in the vegetation as the plants are unable to make use of one nutrient without sufficient amounts of the other'. Source: Understanding Fen Nutrients <http://www.snh.gov.uk/docs/A416930.pdf>

⁶⁸ Thames Water January 2017 Position Statement On Development In The Greater Harlow Area

⁶⁹ JBA Consulting (2018) Harlow Council Water Cycle Study update (Draft Report)

- 8.8 Once the WwTW ceases to have capacity (the Harlow WCS only assessed up to 2036) within its existing discharge consent for effluent from additional dwellings (Thames Water currently expect that Rye Mead WwTW will have sufficient headroom capacity until 2024), it will be necessary for Thames Water to apply to the Environment Agency to increase the consented discharge volume, or direct flows to an alternative treatment facility. The Environment Agency is very unlikely to consent to an increase in discharge volume from the WwTW unless the phosphate concentration within the effluent can be further tightened to ensure no deterioration in water quality in Tollhouse Stream. There is a technical limit (known as the limit of Best Available Technology) to how much phosphorus removal a WwTW can incorporate. If this situation arises, there is a risk that future dwellings within the catchment could not be accommodated at Rye Meads WwTW, requiring an alternative treatment solution that does not as yet exist. Investigating these issues was one of the purposes of the Rye Meads Water Cycle Study (2009)⁷⁰. Water quality is therefore an important pathway to investigate with regard to future development within the Rye Meads WwTW catchment.
- 8.9 With regard to Harlow, the entire district is located within the catchment of Rye Meads WwTW. The bulk of wastewater volumes treated by the WwTW come from Stevenage, Welwyn Garden City and Harlow, in addition to areas in authorities surrounding Harlow that are planning to deliver large quantities of new residential development adjacent to Harlow District particularly the new Garden Communities around Harlow.
- 8.10 Using less water per person will reduce the impact the new development on the hydraulic capacity at Rye Meads WwTW, allowing more development to be catered for within the existing capacity and delay the need for a larger volumetric discharge consent. A recent (June 2017) Position Statement issued by Thames Water to Epping Forest and other relevant authorities has clarified that from a final effluent stream point of view (this being the relevant stream in terms of phosphate loading of discharged effluent) Rye Meads WwTW is expected to have headroom until 2036. This is beyond the plan period and therefore no capacity issues should arise for growth in the catchment. However, it will be necessary to ensure that development within the catchment of Rye Meads WwTW to keep pace with the provision of wastewater treatment infrastructure and environmental capacity there.
- 8.11 It is possible to conclude that the LDP will not result in a water quality effect on Lee Valley SPA and Ramsar site either alone or in combination.

⁷⁰ <http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/Rye%20Meads%20Water%20Cycle%20Strategy.pdf> [accessed 21/12/2017]

9. Summary of Recommendations and Conclusions

- 9.1 Recommendations are made within this HRA as follows.
- 9.2 To enable surrounding HMA authorities and MoU signatories to provide the quantum of housing identified within the West Essex/ East Hertfordshire HMA in proximity to Harlow, it is recommended that the garden communities being created around Harlow should deliver a suitably large amount of natural accessible greenspace to maximise their recreational self-sufficiency. Ultimately the quantum of Green Infrastructure required and achievable will be dependent on the layout of these larger developments and detail will need to be established for individual planning applications. This is a recommendation regarding practical design and implementation of these developments, rather than for the Local Plan itself. It matches recommendations made to Epping Forest District Council regarding their Local Plan.
- 9.3 It is acknowledged that the Harlow Local Plan will not affect the integrity of Epping Forest SAC via atmospheric pollution in isolation, but an adverse effect in combination has been identified without delivery of mitigation, although Harlow are likely to be a more minor contributor than authorities closer to the SAC. The Council already provides a policy hook to address these issues in combination with neighbouring authorities via the cross boundary MoU⁷¹ and the resulting mitigation strategies currently being developed. The strategic transport model is to be rerun and subsequent air quality modelling undertaken prior to commencement of the examination. The modelling will reconfirm the contribution that the plan will provide to atmospheric pollution in Epping Forest and thus its relative contribution to the mitigation strategy. **In addition to the reference in the text of the plan, it is recommended that the Local Plan also provide explicit policy reference to the strategic framework in place to address air quality at Epping Forest, including specific reference to a multi-authority mitigation strategy and a timetable for the production of that strategy (e.g. prior to adoption). This will enable the Council to make contributions to the strategic mitigation that is proportionate to the Plans atmospheric pollution contributions.** With the implementation of this recommendation, it is considered that the Plan and associated Council initiatives (such as the MoU and resulting mitigation strategies) would present a sufficiently robust framework to ensure that the Plan will not affect the integrity of sensitive European sites, although the detailed development of a mitigation strategy is ongoing.
- 9.4 Provided that the above recommendation is incorporated into the LDP, and the traffic and air quality modelling are updated as discussed and demonstrate that mitigation measures are sufficient to address potential adverse effects on the SAC, it can be concluded that the Harlow LDP has a suitable framework in place to ensure that development delivered will not affect the integrity of any European sites either alone or in combination.

⁷¹ Memorandum of Understanding on managing the impacts of growth within the West Essex / East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation (draft September 2016)

Appendix A European Designated Sites Background

Epping Forest SAC

Introduction

Epping Forest SAC is located within Epping Forest District. Approximately 70% of the 1,600 hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Epping Forest SAC supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Reasons for Designation⁷²

Epping Forest qualifies as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of:

- Beech forests on acid soils with *Ilex* and sometime *Taxus* in the shrublayer.
- Wet heathland with cross-leaved heath; and
- Dry heath

Secondly, the site contains the Habitats Directive Annex II species Stag beetle *Lucanus cervus*, with widespread and frequent records.

Current Pressures and Threats⁷³

- Air pollution
- Under grazing
- Public disturbance
- Changes in species distribution
- Inappropriate water levels
- Water pollution
- Invasive species
- Disease

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species

⁷² JNCC (2015) Natura 200 Standard Data Form: Epping Forest SAC

⁷³ Natural England (2015). Site Improvement Plan: Epping Forest SAC

- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site

Lee Valley SPA and Ramsar Site

Introduction

The Lee Valley comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24 km of the valley. These waterbodies support internationally important numbers of wintering gadwall and shoveler, while the reedbeds support a small but internationally important population of bittern. In addition to the ornithological interest, the site also qualifies as a Ramsar site on account on rare and scarce plants and invertebrates present.

The Lee Valley SPA and Ramsar consists of four Sites of Special Scientific Interest, of which Turnford and Cheshunt Pits SSSI, Rye Meads SSSI and Amwell Quarry SSSI all lie on the Hertfordshire/Essex border. Walthamstow Reservoirs SSSI lies within London Borough of Waltham Forest. The Special Protection Area is managed by the Lee Valley Regional Park Authority and by Thames Water.

Reasons for Designation

The Lee Valley site is designated as an SPA⁷⁴: for its Birds Directive Annex I and Ramsar site under criterion 6⁷⁵ for species that over-winter, and these are:

- Bittern *Botaurus stellaris*;
- Gadwall *Anas strepera*;
- Shoveler *Anas clypeata*.

In addition, the site qualifies as a Ramsar under criterion 2⁷⁶, by supporting the nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Current Pressures and Threats⁷⁷

- Water pollution
- Hydrological changes
- Public disturbance
- Inappropriate scrub control
- Fishing
- Air pollution

⁷⁴ <http://jncc.defra.gov.uk/page-2047-theme=default> [accessed 05/12/2017]

⁷⁵ <http://jncc.defra.gov.uk/pdf/RIS/UK11034.pdf> [accessed 05/12/2017]

⁷⁶ Ibid

⁷⁷ <http://publications.naturalengland.org.uk/file/5788502547496960> [accessed 05/12/2017]

- Inappropriate cutting and mowing
- Invasive species

Conservation Objectives⁷⁸

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site

Wormley-Hoddesdonpark Woods SAC

Introduction

This SAC consists of two SSSIs – Wormley-Hoddesdonpark Woods North and Wormley-Hoddesdonpark Woods South and is situated on the southern border of East Herts, with part of the SAC in Broxbourne. The semi-natural woodland is of national importance as an example of lowland south-east sessile oak/hornbeam type with the pedunculate oak/hornbeam variant also present. Additionally, small ponds and streams are important habitats for bryophytes.

Reasons for Designation⁷⁹

Wormley-Hoddesdonpark Woods qualifies as a SAC through its habitats, containing the Habitats Directive Annex I habitat:

- Oak-hornbeam forests – this is one of only two outstanding locations for such habitat in the UK.

Current Pressures and Threats⁸⁰

- Disease
- Invasive species
- Air pollution
- Deer
- Illicit vehicle
- Woodland/ forestry management
- Recreation

Conservation Objectives⁸¹

⁷⁸ <http://publications.naturalengland.org.uk/file/5168095937167360> [accessed 05/12/2017]

⁷⁹ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013696> [accessed 05/12/2017]

⁸⁰ <http://publications.naturalengland.org.uk/file/6541134543192064> [accessed 05/12/2017]

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

⁸¹ <http://publications.naturalengland.org.uk/file/6475250191564800> [accessed 05/12/2017]

Appendix B Figures

Figure B1: Locations of Site Allocations and Internationally Designated Sites

Appendix C HMA 2016 Air Quality Impact Assessment data

Note that this assessment involves data and modelling from 2016.

Traffic flow data

The transport consultancy Jacobs used a spreadsheet model to generate flow data for the following roads within 200m of Epping Forest SAC:

- A121 (two sections);
- A104;
- B1393;
- B172; and
- Theydon Road

The flow data for each road are presented below as Annual Average Daily Traffic (AADT). Percentage heavy duty vehicles and average vehicle speeds are also provided. For the purposes of these analyses it was assumed that percentage HDV and average vehicle speeds would remain essentially similar to 2033; this is the standard assumption. Baseline is the AADT flow on each link as of 2014. Do Minimum is the change in flows due to delivery of existing planning permissions in the HMA and general background traffic growth as a result of population growth expected to 2033 without any of the HMA Options. The flows due to each HMA option are then shown in Columns 4 to 8. All Options A to E involved the same assumptions about employment traffic.

1	2			3	4	5	6	7	8
	Baseline (2014)			2033 Do Minimum	Option A	Option B	Option C	Option D	Option E
Link (NB = northbound lane etc.)	AADT	% HDV	Speed (kph)	AADT	AADT	AADT	AADT	AADT	AADT
B1393 NB	10593	2.9	62	12861	13719	13699	13713	13422	13827
B1393 SB	9477	1.3	45	12074	12853	12697	12858	12462	12646
B172 EB	3907	2.5	53	4472	4223	4222	4225	4190	4232
B172 WB	4241	4.9	40	4926	4992	4953	4957	4950	5035
A121 between Wake Arms Roundabout and Loughton NB	9980	1.2	19	11859	12075	12063	12051	11843	12181
A121 between Wake Arms Roundabout and Loughton SB	10430	2.1	56	12134	11607	11550	11589	11504	11593
A104 NB	8031	4.0	53	9680	9954	10000	10001	9669	10017
A104 SB	8165	2.7	48	10356	11684	11431	11599	11449	11660
A121 between Wake Arms Roundabout and the M25 EB	12228	2.8	34	13982	14029	13927	14001	14027	14074
A121 between Wake Arms Roundabout and the M25 WB	13008	3.5	40	15798	17075	16974	17023	16632	17130
Theydon Rd NB	4225	1.2	54	5174	5233	5251	5257	5092	5262
Theydon Rd SB	3677	1.5	53	4681	4976	4901	4973	4858	4903

The total change in two-way flows between Options A to E on the one hand and the Do Minimum Scenario on the other tells us the change specifically due to each Option (as distinct from the total change to 2033). These are the data that are used to determine the specific impact of each option in line with the Design Manual for Roads and Bridges.

		Change in two-way AADT compared to DM. Positive numerals mean an increase, negative numerals mean a decrease				
Link	2033 Do Minimum two way flows	Option A	Option B	Option C	Option D	Option E
B1393	24,935	1,637	1,461	1,636	949	1,538
B172	9,398	- 183	- 223	- 216	- 258	- 131
A121 (between Wake Arms Roundabout and Loughton)	23,993	- 311	- 380	- 353	- 646	- 219
A104	20,036	1,602	1,395	1,564	1,082	1,641
A121 (between Wake Arms Roundabout and M25)	29,780	1,324	1,121	1,244	879	1,424
Theydon Rd	9,855	354	297	375	95	310

From examining the changes in flows due to each Option, it can be seen that the change in flows is fairly small in all cases. This is probably because:

1. Although the total amount of housing being planned under each option is large, a significant proportion of that housing already has planning permission (and is thus counted as part of the Do Minimum Scenario, since it would occur whether or not any of the Scenarios were chosen);
2. Of the housing that does not have planning permission, a large amount in each case is situated between 5km and 10km north of Epping Forest SAC around Harlow, such that there are plenty of opportunities for traffic generated by that housing to disperse across the network before it reaches Epping Forest SAC; and
3. All of these scenarios involve some transport improvements and the model may have predicted that vehicle flows on some links will change due to those. Alternatively, the model may be assuming traffic is redeploying onto other roads for other reasons. For example, scrutiny of the data suggests that under each Option the traffic model expects slightly less traffic to head south from Wake Arms Roundabout to Loughton than would otherwise occur by 2033, but expects slightly more to move between Wake Arms Roundabout and the M25 in both directions.

It is important to remember that the numbers above are the changes in flows due to that option compared to the 2033 flows without that option. So, for example, Option D for Theydon Road is not saying that by 2033 flows will only have increased by 95 vehicles per day compared to 2014, but that a further 95 vehicles per day (average) is the difference which Option D would make compared to background traffic growth and delivery of existing planning permissions.

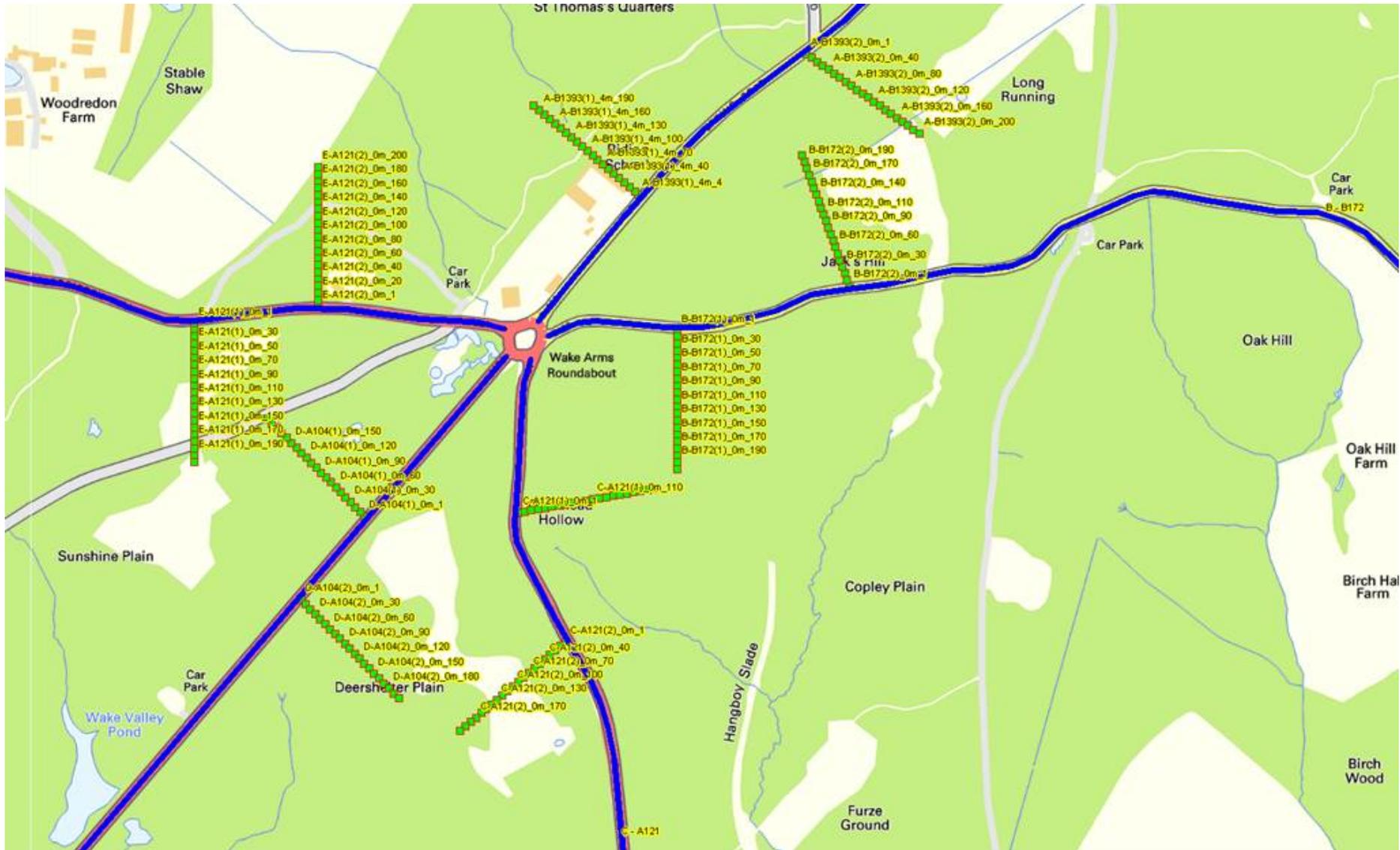
The two links (B172 and A121 from Wake Arms Roundabout to Loughton) that are predicted to experience an overall reduction in flows by 2033 due to every Option are not presented as air quality calculations below, since clearly the impact of the Options A to E will not be adverse compared to the situation without any Option.

Air quality calculations

For each of the roads air quality transects were calculated up to 200m back from the roadside as below. For some road sections (particularly around Wake Arms Roundabout) multiple transects were modelled to account for the influence of the predominant wind direction and emissions from the other nearby road links. In the summary tables below the worst case results are presented for each road link and option.



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When calculating Do Minimum NOx concentrations, air quality impact assessment guidance from Department for Transport (HA207/07, Annex F) advises that baseline concentrations should be reduced by 2% per annum in order to reflect expected improvements in background air quality in the future. However, we are aware that some regard this as overambitious. Therefore, in the tables below we have made the assumption that that conditions in 2023 (the midpoint between the base year and the year of assessment) are representative of conditions in 2033 (the year of assessment). This approach is accepted within the professional air quality community and accounts for known recent improvements in vehicle technologies (new standard Euro 6/VI vehicles), whilst excluding the more distant and tenuous projections regarding the evolution of the vehicle fleet.

In the tables that follow, each option is analysed for each road link. The air quality impact of each option is reflected in the 'Change' column, this being the difference between the 2033 Do Minimum Scenario and each HMA Option. The model also shows the 'in combination' scenario by comparing the Do Something scenario with the Base scenario. This shows the effect of all forecast additional traffic on the network by 2033 irrespective of source (i.e. not just from within the HMA authorities), taking account of forecast improvements in emission technology.

Option A

A121 between Wake Arms Roundabout and M25												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	92.1	55.0	56.5	1.5	17.77	13.13	13.20	0.06	1.36	1.24	1.24	0.01
10	60.0	36.9	37.7	0.8	16.47	12.34	12.38	0.04	1.23	1.16	1.16	0.00
20	48.6	30.4	30.9	0.5	15.95	12.03	12.06	0.03	1.17	1.12	1.13	0.00
50	37.8	24.4	24.7	0.3	15.43	11.74	11.75	0.01	1.12	1.09	1.09	0.00
100	32.8	21.7	21.8	0.2	15.19	11.60	11.61	0.01	1.10	1.08	1.08	0.00
150	30.9	20.6	20.7	0.1	15.09	11.55	11.56	0.01	1.09	1.07	1.07	0.00
200	29.9	20.1	20.2	0.1	15.04	11.52	11.53	0.00	1.08	1.07	1.07	0.00
B1393												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	59.6	38.5	39.8	1.4	16.60	12.51	12.57	0.06	1.24	1.17	1.18	0.01
10	43.0	28.2	28.9	0.7	15.84	12.02	12.06	0.04	1.16	1.12	1.13	0.00
20	36.7	24.3	24.8	0.5	15.54	11.83	11.86	0.03	1.13	1.10	1.11	0.00
50	30.7	20.6	20.8	0.3	15.24	11.64	11.66	0.01	1.10	1.08	1.09	0.00
100	28.0	18.9	19.1	0.1	15.10	11.56	11.57	0.01	1.09	1.08	1.08	0.00
150	27.0	18.3	18.4	0.1	15.05	11.53	11.53	0.01	1.08	1.07	1.07	0.00
200	26.5	18.0	18.1	0.1	15.02	11.51	11.52	0.00	1.08	1.07	1.07	0.00
A104												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	59.1	37.2	38.8	1.6	16.57	12.42	12.50	0.07	1.24	1.16	1.17	0.01
10	42.2	27.4	28.2	0.8	15.80	11.96	11.99	0.04	1.16	1.12	1.12	0.00
20	36.2	24.0	24.5	0.5	15.50	11.79	11.81	0.03	1.13	1.10	1.10	0.00

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50	30.5	20.7	21.0	0.3	15.21	11.62	11.64	0.01	1.10	1.08	1.08	0.00
100	28.0	19.3	19.4	0.2	15.08	11.55	11.56	0.01	1.09	1.07	1.07	0.00
150	27.0	18.7	18.9	0.1	15.04	11.52	11.53	0.01	1.08	1.07	1.07	0.00
200	26.6	18.5	18.6	0.1	15.01	11.51	11.51	0.01	1.08	1.07	1.07	0.00
Theydon Road												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	41.3	26.5	26.8	0.3	15.48	11.81	11.83	0.01	1.22	1.19	1.19	0.00
10	34.9	22.4	22.6	0.1	15.16	11.61	11.62	0.01	1.18	1.17	1.17	0.00
20	32.8	21.1	21.2	0.1	15.06	11.55	11.55	0.01	1.17	1.16	1.16	0.00
50	31.0	20.0	20.0	0.1	14.96	11.49	11.49	0.00	1.16	1.16	1.16	0.00
100	30.2	19.5	19.6	0.0	14.92	11.46	11.46	0.00	1.16	1.16	1.16	0.00
150	30.0	19.4	19.4	0.0	14.91	11.45	11.46	0.00	1.16	1.15	1.15	0.00
200	29.9	19.3	19.3	0.0	14.91	11.45	11.45	0.00	1.16	1.15	1.15	0.00

Option B

Theydon Road												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	41.3	26.5	26.8	0.2	15.48	11.81	11.83	0.01	1.22	1.19	1.19	0.00
10	34.9	22.4	22.6	0.1	15.16	11.61	11.62	0.01	1.18	1.17	1.17	0.00
20	32.8	21.1	21.2	0.1	15.06	11.55	11.55	0.00	1.17	1.16	1.16	0.00
50	31.0	20.0	20.0	0.0	14.96	11.49	11.49	0.00	1.16	1.16	1.16	0.00
100	30.2	19.5	19.6	0.0	14.92	11.46	11.46	0.00	1.16	1.16	1.16	0.00
150	30.0	19.4	19.4	0.0	14.91	11.45	11.46	0.00	1.16	1.15	1.15	0.00
200	29.9	19.3	19.3	0.0	14.91	11.45	11.45	0.00	1.16	1.15	1.15	0.00
A121 between Wake Arms Roundabout and M25												

	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	92.1	55.0	56.2	1.3	17.77	13.13	13.19	0.05	1.36	1.24	1.24	0.01
10	60.0	36.9	37.5	0.7	16.47	12.34	12.37	0.03	1.23	1.16	1.16	0.00
20	48.6	30.4	30.9	0.4	15.95	12.03	12.06	0.02	1.17	1.12	1.13	0.00
50	37.8	24.4	24.6	0.2	15.43	11.74	11.75	0.01	1.12	1.09	1.09	0.00
100	32.8	21.7	21.8	0.1	15.19	11.60	11.61	0.01	1.10	1.08	1.08	0.00
150	30.9	20.6	20.7	0.1	15.09	11.55	11.55	0.00	1.09	1.07	1.07	0.00
200	29.9	20.1	20.1	0.1	15.04	11.52	11.52	0.00	1.08	1.07	1.07	0.00
B1393												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	65.8	41.3	42.6	1.3	16.60	12.52	12.57	0.06	1.33	1.26	1.27	0.01
10	47.5	30.1	30.8	0.6	15.78	11.99	12.02	0.03	1.25	1.21	1.21	0.00
20	41.1	26.2	26.6	0.4	15.47	11.80	11.82	0.02	1.21	1.19	1.19	0.00
50	35.0	22.4	22.6	0.2	15.17	11.61	11.62	0.01	1.18	1.17	1.17	0.00
100	32.3	20.7	20.8	0.1	15.03	11.52	11.53	0.01	1.17	1.16	1.16	0.00
150	31.2	20.1	20.2	0.1	14.98	11.49	11.50	0.00	1.16	1.16	1.16	0.00
200	30.7	19.8	19.8	0.1	14.95	11.48	11.48	0.00	1.16	1.16	1.16	0.00
A104												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	59.1	37.2	38.6	1.4	16.57	12.42	12.49	0.06	1.24	1.16	1.17	0.01
10	42.2	27.4	28.1	0.7	15.80	11.96	11.99	0.03	1.16	1.12	1.12	0.00
20	36.2	24.0	24.4	0.5	15.50	11.79	11.81	0.02	1.13	1.10	1.10	0.00
50	30.5	20.7	20.9	0.2	15.21	11.62	11.63	0.01	1.10	1.08	1.08	0.00
100	28.0	19.3	19.4	0.1	15.08	11.55	11.56	0.01	1.09	1.07	1.07	0.00

150	27.0	18.7	18.8	0.1	15.04	11.52	11.53	0.01	1.08	1.07	1.07	0.00
200	26.6	18.5	18.6	0.1	15.01	11.51	11.51	0.00	1.08	1.07	1.07	0.00

Option C

Theydon Road												
Distance (m)	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	41.3	26.5	26.8	0.3	15.48	11.81	11.83	0.02	1.22	1.19	1.19	0.00
10	34.9	22.4	22.6	0.2	15.16	11.61	11.62	0.01	1.18	1.17	1.17	0.00
20	32.8	21.1	21.2	0.1	15.06	11.55	11.55	0.01	1.17	1.16	1.16	0.00
50	31.0	20.0	20.0	0.1	14.96	11.49	11.49	0.00	1.16	1.16	1.16	0.00
100	30.2	19.5	19.6	0.0	14.92	11.46	11.46	0.00	1.16	1.16	1.16	0.00
150	30.0	19.4	19.4	0.0	14.91	11.45	11.46	0.00	1.16	1.15	1.15	0.00
200	29.9	19.3	19.3	0.0	14.91	11.45	11.45	0.00	1.16	1.15	1.15	0.00
A121 between Wake Arms Roundabout and M25												
Distance (m)	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	92.1	55.0	56.4	1.4	17.77	13.13	13.19	0.06	1.36	1.24	1.24	0.01
10	60.0	36.9	37.6	0.7	16.47	12.34	12.37	0.04	1.23	1.16	1.16	0.00
20	48.6	30.4	30.9	0.5	15.95	12.03	12.06	0.02	1.17	1.12	1.13	0.00
50	37.8	24.4	24.6	0.3	15.43	11.74	11.75	0.01	1.12	1.09	1.09	0.00
100	32.8	21.7	21.8	0.2	15.19	11.60	11.61	0.01	1.10	1.08	1.08	0.00
150	30.9	20.6	20.7	0.1	15.09	11.55	11.55	0.00	1.09	1.07	1.07	0.00
200	29.9	20.1	20.1	0.1	15.04	11.52	11.53	0.00	1.08	1.07	1.07	0.00
B1393												
Distance (m)	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change

1	59.6	38.5	39.8	1.4	16.60	12.51	12.57	0.06	1.24	1.17	1.18	0.01
10	43.0	28.2	28.9	0.7	15.84	12.02	12.06	0.04	1.16	1.12	1.13	0.00
20	36.7	24.3	24.8	0.5	15.54	11.83	11.86	0.03	1.13	1.10	1.11	0.00
50	30.7	20.6	20.8	0.3	15.24	11.64	11.66	0.01	1.10	1.08	1.09	0.00
100	28.0	18.9	19.1	0.1	15.10	11.56	11.57	0.01	1.09	1.08	1.08	0.00
150	27.0	18.3	18.4	0.1	15.05	11.53	11.53	0.01	1.08	1.07	1.07	0.00
200	26.5	18.0	18.1	0.1	15.02	11.51	11.52	0.00	1.08	1.07	1.07	0.00
A104												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	59.1	37.2	38.8	1.5	16.57	12.42	12.49	0.07	1.24	1.16	1.17	0.01
10	42.2	27.4	28.2	0.8	15.80	11.96	11.99	0.04	1.16	1.12	1.12	0.00
20	36.2	24.0	24.5	0.5	15.50	11.79	11.81	0.03	1.13	1.10	1.10	0.00
50	30.5	20.7	21.0	0.3	15.21	11.62	11.64	0.01	1.10	1.08	1.08	0.00
100	28.0	19.3	19.4	0.2	15.08	11.55	11.56	0.01	1.09	1.07	1.07	0.00
150	27.0	18.7	18.8	0.1	15.04	11.52	11.53	0.01	1.08	1.07	1.07	0.00
200	26.6	18.5	18.6	0.1	15.01	11.51	11.51	0.00	1.08	1.07	1.07	0.00

Option D

Theydon Road												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	41.3	26.5	26.6	0.1	15.48	11.81	11.82	0.00	1.22	1.19	1.19	0.00
10	34.9	22.4	22.5	0.0	15.16	11.61	11.61	0.00	1.18	1.17	1.17	0.00
20	32.8	21.1	21.2	0.0	15.06	11.55	11.55	0.00	1.17	1.16	1.16	0.00
50	31.0	20.0	20.0	0.0	14.96	11.49	11.49	0.00	1.16	1.16	1.16	0.00
100	30.2	19.5	19.5	0.0	14.92	11.46	11.46	0.00	1.16	1.16	1.16	0.00
150	30.0	19.4	19.4	0.0	14.91	11.45	11.46	0.00	1.16	1.15	1.15	0.00
200	29.9	19.3	19.3	0.0	14.91	11.45	11.45	0.00	1.16	1.15	1.15	0.00
A121 between Wake Arms Roundabout and M25												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	92.1	55.0	56.0	1.0	17.77	13.13	13.18	0.04	1.36	1.24	1.24	0.00
10	60.0	36.9	37.4	0.5	16.47	12.34	12.36	0.02	1.23	1.16	1.16	0.00
20	48.6	30.4	30.8	0.3	15.95	12.03	12.05	0.02	1.17	1.12	1.13	0.00
50	37.8	24.4	24.6	0.2	15.43	11.74	11.75	0.01	1.12	1.09	1.09	0.00
100	32.8	21.7	21.8	0.1	15.19	11.60	11.61	0.01	1.10	1.08	1.08	0.00
150	30.9	20.6	20.7	0.1	15.09	11.55	11.55	0.00	1.09	1.07	1.07	0.00
200	29.9	20.1	20.1	0.1	15.04	11.52	11.52	0.00	1.08	1.07	1.07	0.00
B1393												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	65.8	41.3	42.2	0.8	16.60	12.52	12.55	0.04	1.33	1.26	1.27	0.00
10	47.5	30.1	30.5	0.4	15.78	11.99	12.01	0.02	1.25	1.21	1.21	0.00
20	41.1	26.2	26.4	0.3	15.47	11.80	11.81	0.01	1.21	1.19	1.19	0.00

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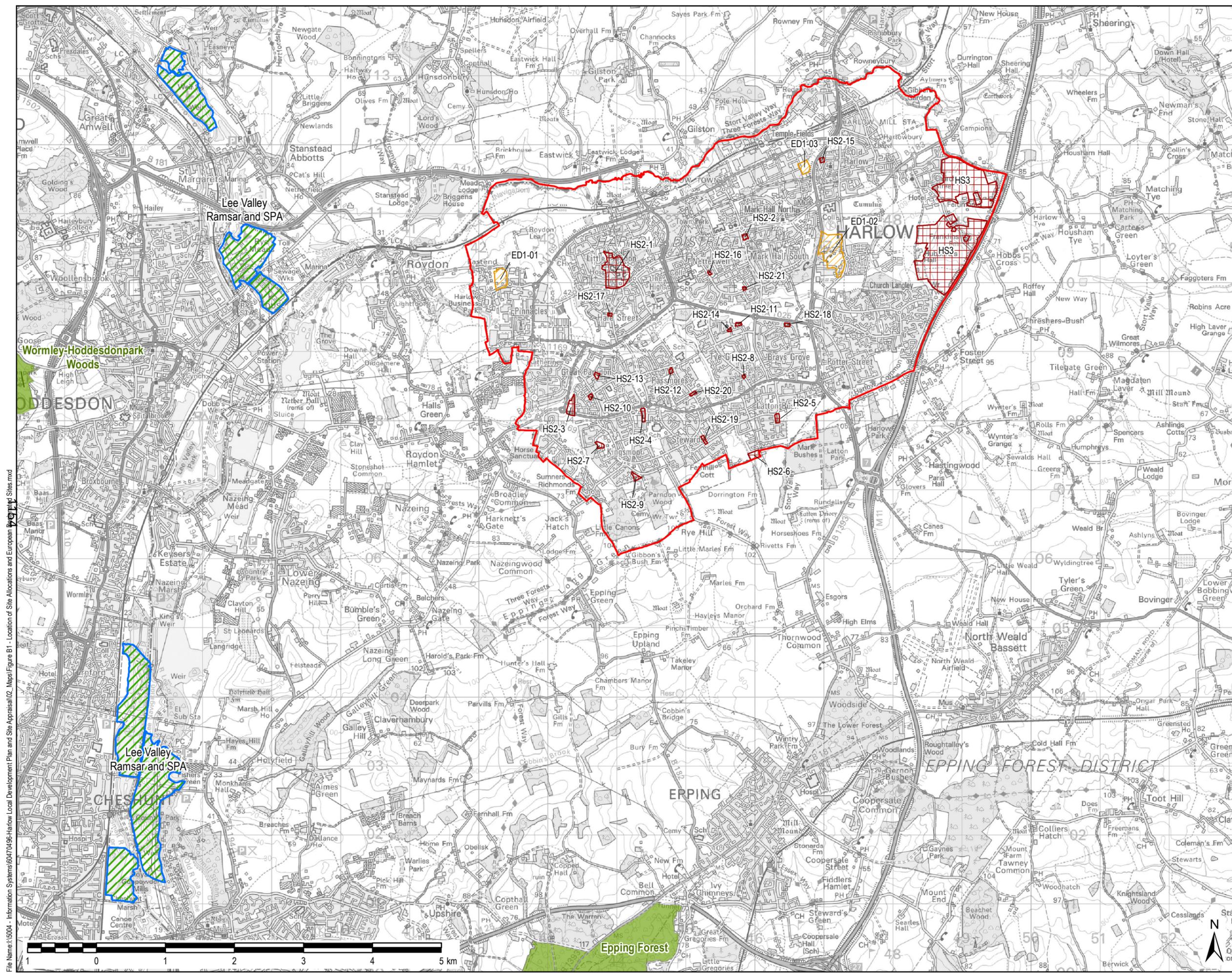
50	35.0	22.4	22.5	0.1	15.17	11.61	11.61	0.01	1.18	1.17	1.17	0.00
100	32.3	20.7	20.8	0.1	15.03	11.52	11.53	0.00	1.17	1.16	1.16	0.00
150	31.2	20.1	20.1	0.1	14.98	11.49	11.49	0.00	1.16	1.16	1.16	0.00
200	30.7	19.8	19.8	0.0	14.95	11.48	11.48	0.00	1.16	1.16	1.16	0.00
A104												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	59.1	37.2	38.3	1.1	16.57	12.42	12.47	0.05	1.24	1.16	1.17	0.01
10	42.2	27.4	27.9	0.5	15.80	11.96	11.98	0.03	1.16	1.12	1.12	0.00
20	36.2	24.0	24.3	0.4	15.50	11.79	11.80	0.02	1.13	1.10	1.10	0.00
50	30.5	20.7	20.9	0.2	15.21	11.62	11.63	0.01	1.10	1.08	1.08	0.00
100	28.0	19.3	19.4	0.1	15.08	11.55	11.55	0.01	1.09	1.07	1.07	0.00
150	27.0	18.7	18.8	0.1	15.04	11.52	11.53	0.00	1.08	1.07	1.07	0.00
200	26.6	18.5	18.5	0.1	15.01	11.51	11.51	0.00	1.08	1.07	1.07	0.00

Option E

Theydon Road												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	41.3	23.3	23.5	0.2	15.48	10.21	10.22	0.01	1.22	1.18	1.18	0.00
10	34.9	20.2	20.3	0.1	15.16	10.06	10.06	0.00	1.18	1.17	1.17	0.00
20	32.8	19.2	19.3	0.1	15.06	10.01	10.01	0.00	1.17	1.16	1.16	0.00
50	31.0	18.3	18.3	0.0	14.96	9.96	9.97	0.00	1.16	1.16	1.16	0.00
100	30.2	17.9	18.0	0.0	14.92	9.95	9.95	0.00	1.16	1.15	1.15	0.00
150	30.0	17.8	17.9	0.0	14.91	9.94	9.94	0.00	1.16	1.15	1.15	0.00
200	29.9	17.8	17.8	0.0	14.91	9.94	9.94	0.00	1.16	1.15	1.15	0.00
A121 between Wake Arms Roundabout and M25												

	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	92.1	45.2	46.4	1.3	17.77	11.22	11.27	0.05	1.36	1.20	1.20	0.01
10	60.0	31.3	32.0	0.7	16.47	10.61	10.64	0.03	1.23	1.13	1.14	0.00
20	48.6	26.4	26.8	0.4	15.95	10.37	10.39	0.02	1.17	1.11	1.11	0.00
50	37.8	21.7	22.0	0.2	15.43	10.15	10.16	0.01	1.12	1.08	1.09	0.00
100	32.8	19.7	19.8	0.1	15.19	10.05	10.05	0.01	1.10	1.07	1.08	0.00
150	30.9	18.9	19.0	0.1	15.09	10.01	10.01	0.01	1.09	1.07	1.07	0.00
200	29.9	18.5	18.5	0.1	15.04	9.99	9.99	0.00	1.08	1.07	1.07	0.00
B1393												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	59.6	32.4	33.4	1.0	16.60	10.74	10.79	0.05	1.24	1.15	1.15	0.00
10	43.0	24.5	25.0	0.5	15.84	10.37	10.39	0.03	1.16	1.11	1.11	0.00
20	36.7	21.5	21.8	0.4	15.54	10.22	10.24	0.02	1.13	1.09	1.09	0.00
50	30.7	18.6	18.8	0.2	15.24	10.08	10.09	0.01	1.10	1.08	1.08	0.00
100	28.0	17.3	17.5	0.1	15.10	10.02	10.02	0.01	1.09	1.07	1.07	0.00
150	27.0	16.9	17.0	0.1	15.05	9.99	10.00	0.00	1.08	1.07	1.07	0.00
200	26.5	16.7	16.7	0.1	15.02	9.98	9.99	0.00	1.08	1.07	1.07	0.00
A104												
	Annual Mean Nox Conc. (ug/m3)				Annual Mean N Dep (k N/ha/yr)				Annual Mean A Dep (keq/ha/yr)			
Distance (m)	BL	DM	DS	Change	BL	DM	DS	Change	BL	DM	DS	Change
1	59.1	31.6	32.8	1.2	16.57	10.67	10.73	0.06	1.24	1.14	1.14	0.01
10	42.2	24.0	24.6	0.6	15.80	10.32	10.35	0.03	1.16	1.10	1.11	0.00
20	36.2	21.4	21.8	0.4	15.50	10.19	10.21	0.02	1.13	1.09	1.09	0.00
50	30.5	18.9	19.1	0.2	15.21	10.06	10.07	0.01	1.10	1.08	1.08	0.00
100	28.0	17.8	17.9	0.1	15.08	10.01	10.01	0.01	1.09	1.07	1.07	0.00

150	27.0	17.4	17.5	0.1	15.04	9.99	9.99	0.00	1.08	1.07	1.07	0.00
200	26.6	17.2	17.2	0.1	15.01	9.98	9.98	0.00	1.08	1.07	1.07	0.00



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

- LEGEND**
- Harlow District Boundary
 - Employment Allocation
 - Housing Allocation
 - Ramsar
 - Special Area of Conservation (SAC)
 - Special Protection Area (SPA)

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Purpose of Issue **DRAFT**

Client **HARLOW COUNCIL**

Project Title
HABITATS REGULATIONS ASSESSMENT SCREENING OF HARLOW LOCAL DEVELOPMENT PLAN

Drawing Title
LOCATION OF SITE ALLOCATIONS AND EUROPEAN DESIGNATED SITES

Drawn TD	Checked JW	Approved IHH	Date 10/01/2018
AECOM Internal Project No. 60470496		Scale @ A3 1:50,000	

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Drawing Number **FIGURE B1**

File Name: I:\5004 - Information Systems\60470496-Harlow Local Development Plan and Site Appraisal\02 - Maps\Figure B1 - Location of Site Allocations and European Designated Sites.mxd



Statement of Community Involvement Review

Adopted September 2014



On reasonable request, the Council will use its best endeavours to provide this document in alternative formats such as large copy print.

- 1 -

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1. Introduction

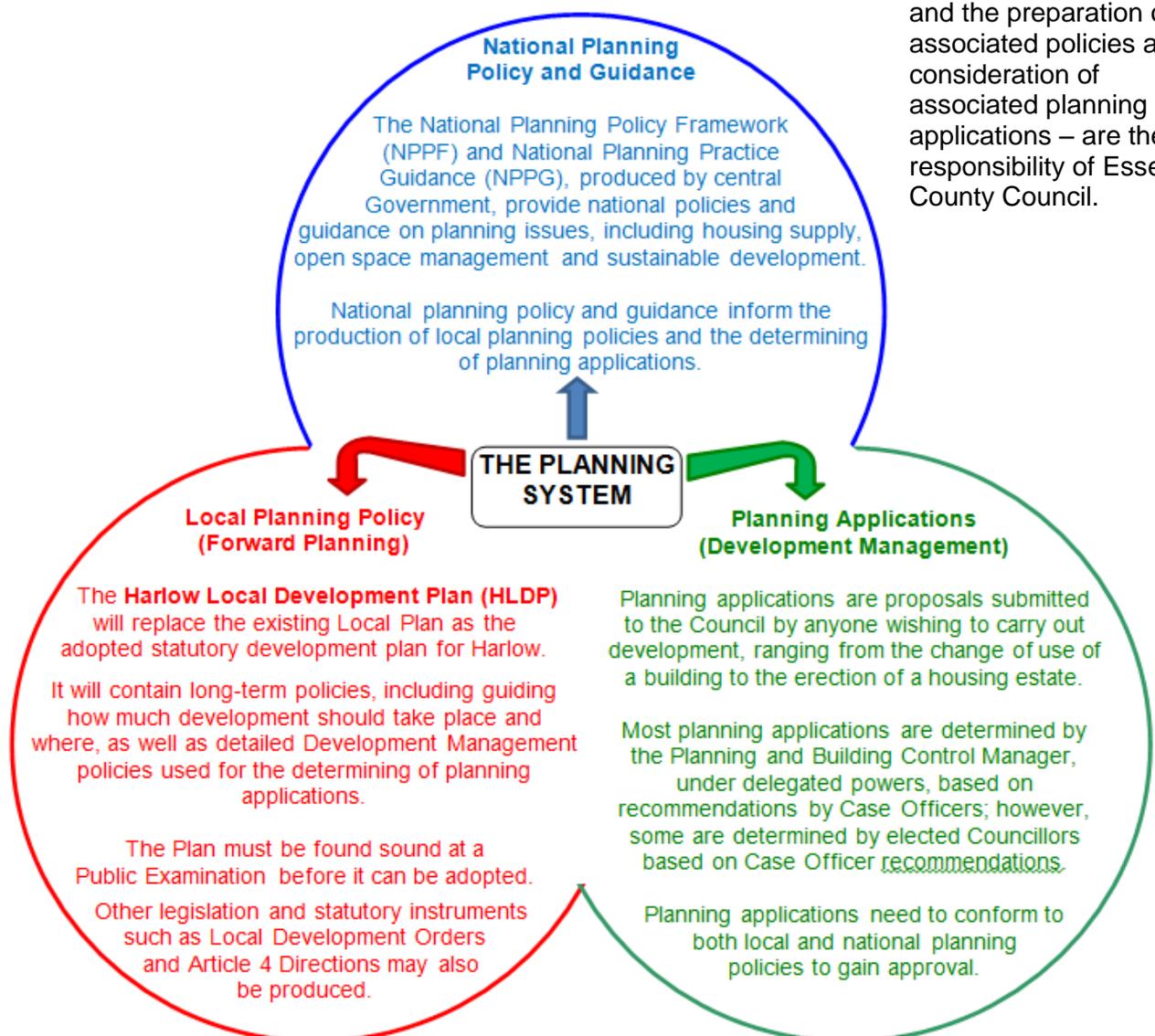
- 1.1 Planning considers a number of issues, including housing, transport, the environment and climate change. The decisions that are made through the planning system affect us all, so getting involved in planning processes is important for everyone.
- 1.2 Whilst many people already comment on applications, it is important to also comment on the preparation of local planning policies, because decisions on planning applications are made in accordance with local (and national) planning policies¹.
- 1.3 Gathering the views of the local community is vital for the Council, as it allows planning decisions to be made which best reflect the needs, aspirations and wishes of Harlow and the people who live, visit and work in the town.
- 1.4 All Local Planning Authorities are required to produce a Statement of Community Involvement (SCI) to comply with national legislation, policies and guidance. The SCI details:
 - how and when the Council will carry out public consultations with the local community during the preparation of local planning policies and the determining of planning applications;
 - the ways in which local communities can respond during these consultations; and
 - the Council's commitment to ensuring that local people, businesses and organisations have involvement in local planning matters.
- 1.5 The Council, in its capacity as Local Planning Authority, must follow the procedures for consultation and engagement as set out in the SCI once it is adopted. Harlow Council published and adopted its existing SCI in 2014.
- 1.6 This SCI Review was prepared in accordance with current legislation¹ following recent changes by central Government to the planning system, as well as feedback from consultation events undertaken by the Council in recent years. For information on the consultation process, comments received and resulting changes to the draft, see Appendix 1: SCI Draft Review Consultation.
- 1.7 In February 2016 a few minor amendments were made to the document. These amendments were not consulted on as they caused no changes to standards or to policies set out within the document. The changes were made to increase the clarity of the document and make it as user-friendly as possible. Where relevant, updates were also made to the list of specific consultees. For example English Heritage has now changed its name to Historic England.

¹ Including The Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Development Management Procedure) (England) Order 2010, the Localism Act 2011, the Town and Country Planning (Local Planning) (England) Regulations 2012, the Planning (Listed Buildings and Conservation Areas) Act 1990, the National Planning Policy Framework and National Planning Practice Guidance.

2. The Planning System

- 2.1 In its capacity as Local Planning Authority, Harlow Council has two main responsibilities: producing local planning policies - which are set out in a Local Development Plan - and determining planning applications.
- 2.2 Central Government has made significant changes to the planning system in recent years, including replacing most existing national planning policies and guidance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).
- 2.3 Fig. 2.1 overleaf provides a brief overview of the planning system and how it operates.

Fig. 2.1: Overview of the Planning System



Note: Certain matters such as minerals & waste, schools and highways – and the preparation of associated policies and consideration of associated planning applications – are the responsibility of Essex County Council.

3. Forward Planning

- 3.1 The Forward Planning team is responsible for keeping under review the social, economic and environmental conditions of Harlow, and for producing local planning policies that shape and guide development to meet Harlow's current and future needs.
- 3.2 A Local Development Plan contains the local planning policies which guide various long-term aspects, including housing, regeneration, protection and supply of green space, retail development and infrastructure.
- 3.3 The emerging Harlow Local Development Plan (HLDP) will replace the existing Adopted Harlow Replacement Local Plan as the statutory Development Plan for Harlow. It will contain policies and proposals, illustrated through the Policies Map, which will shape the development of Harlow up to 2031. It will be underpinned by a detailed evidence base and accompanied by Supplementary Planning Documents (SPDs), the Statement of Community Involvement (SCI) and Authority Monitoring Reports (AMRs).
- 3.4 Additionally, other legislation and statutory instruments such as Article 4 Directions and Local Development Orders may be produced as required and consulted on in accordance with the appropriate legislation.
- 3.5 For more information on the progress of the production of the HLDP and what it will contain, please see the Local Development Scheme.
- 3.6 Planning applications are determined in accordance with local and national planning policies, so local planning policies are critical in helping to decide what will be protected and where, and what will and what will not be given permission to be developed.
- 3.7 The Council is committed to producing documents which are written clearly and concisely, with the avoidance of technical language wherever possible. Sometimes the use of technical language is unavoidable due to the nature of the matters being considered and the legislative requirements of the planning system. Where possible, however, related documents contain glossaries to explain any technical terms and abbreviations used.
- 3.8 Table 3.1 summarises the different types of local planning policy documents – that form the Local Development Plan – and their consultation requirements, based on the minimum legislative requirements. Where necessary for certain documents and depending on available resources, levels of consultation may be further increased.

Table 3.1: Local Planning Policy Documents & Consultation Requirements

Document type	Are these documents required or optional?	Will public consultation take place?	Will an examination take place?
Development Plan Documents (includes Policies Map and Evidence Base)	Required	Yes	Yes
Supplementary Planning Documents	Optional	Yes	No
Statement of Community Involvement (SCI)	Required	Yes	No
Local Development Scheme (LDS)	Required	No	No
Authority Monitoring Reports (AMRs)	Required	No	No
Area Action Plans (AAPs)	Optional	Yes	Yes
Neighbourhood Plans	Optional	Yes*	Yes*
Other legislation and statutory instruments (such as Article 4 Directions and Local Development Orders)	Optional	Yes	No

**Public consultation on Neighbourhood Plans is undertaken by the body/ies preparing the Plan, following which the Plan is subject to examination by an independent body. A local referendum on the Plan is then held; the results of which determine whether it can be adopted and used in the determining of planning applications.*

Note: The requirements listed in the above table may change depending on the legislative requirements for a document at the time it is produced.

Planning Policy Consultation Methods

- 3.9 The Council will consult with as many people and organisations as possible, as well as any other consultees that may be relevant for the document or subject matter being consulted upon.
- 3.10 Table 3.2 indicates the ways in which the Council consults on local planning policy documents. The actual level of consultation will depend on the specific requirements of relevant legislation for the document being consulted on, the scale of the consultation and the availability of resources. The Council will always meet the required minimum legislative requirements and, where possible, will exceed these.

Table 3.2. Possible Planning Policy Consultation Methods

	<p>Website and Consultation Portal On the Council’s website, news and information on the preparation of local planning policies is published, along with information on how to take part in consultations and the results of previous consultations. The policies themselves, including their evidence bases (where appropriate) are also made available to download free of charge. Hard copies and/or copies on CDs may be available (possibly for a small fee). The online Consultation Portal (see www.harlow.gov.uk/local-plan) allows people to sign up to be notified on the progress of the preparation of local planning policies, as well as make comments during consultations and read other people’s comments.</p>
	<p>Provision of hard copies of documents While documents are being consulted on, hard copies are available to view in the Civic Centre, Harlow Central Library and, where appropriate, other public places in the district</p>
	<p>Local Media Notices and/or articles may be published in the local media, detailing public consultations on planning policy documents, including the dates of the consultation, the availability of documents and how to make comments</p>
	<p>Social Networking Advertisements about public consultations and how to take part in them are posted on the Council’s social media accounts</p>
	<p>Surveys and Questionnaires Surveys and questionnaires may be issued by the Council to gather the views and opinions of local residents, groups and businesses on relevant planning issues</p>
	<p>Presentations, workshops and focus groups Presentations, workshops and focus groups may be held with various bodies – including hard-to-reach groups – to discuss documents which are being consulted on</p>
	<p>Leaflets and posters Leaflets and posters are displayed in various public locations to advertise public consultations. If appropriate, site notices are displayed in the relevant area(s)</p>
	<p>Exhibitions Exhibitions – including information boards and possibly the presence of staff from the Forward Planning team – may be held in easy-to-reach publicly accessible places (such as libraries, shopping centres and community centres)</p>
	<p>Council meetings Planning policy documents are often discussed by Councillors at public council meetings before and after they are consulted on. When final versions of documents have been produced, they are adopted by Councillors at a public council meeting</p>
	<p>Press conferences Press conferences may be held to inform the local media about a document which is being consulted on</p>

	<p>TV and radio interviews</p> <p>Members of Council staff and elected Councillors may be interviewed by local and national TV and radio, in relation to local planning policy documents. Harlow has been featured in recent years on BBC <i>Newsnight</i>, for example, in relation to housing provision in the district</p>
	<p>Notifications</p> <p>The Council keeps and maintains a secure database of people and organisations who wish to be informed on matters relating to local planning policy documents, and sends letters/emails to such contacts to inform them of when a document is being consulted on and when it is adopted and brought into force.</p> <p>People and organisations can be added to, or removed from, the database via the Council's website (www.harlow.gov.uk/local-plan)</p> <p>Additionally, if you are likely to be affected by the introduction of a policy document, then depending on legislative requirements you may be notified by letter/email of any consultation and eventual adoption</p>

3.11 Tables 3.3 to 3.11 provide more detailed information on the consultation methods during the preparation of the two main types of planning policy documents (Development Plan Documents and Supplementary Planning Documents).

3.12 The planning system is a transparent process. Therefore, when you respond to a public consultation, comments and information you submit – as well as your name – may be made available for public inspection on the Council's website and in relevant documents. Certain information will be redacted before it is published online. All information received during public consultations is held by the Council in accordance with the Data Protection Act 1998 and the Freedom of Information Act 2000.

Hard-to-reach groups

3.13 The Council pays close attention to consulting hard-to-reach groups, such as disability groups and young people. It is recognised that the range of diversity within such groups means that generalisations cannot be made; therefore the issues facing these groups varies. These may include poor literacy, visual impairment, disabilities, difficulty travelling and limited internet access.

3.14 There are a number of methods which the Council may use to ensure sufficient consultation is carried out with hard-to-reach groups. Where resources allow, these methods may include:

- sending the groups hard copies of documents;
- producing easy-to-understand and easy-to-read summary leaflets;
- providing telephone interpreting services; and
- making meetings available with groups at accessible locations.

3.15 The Council's Planning Department works with the Council's Human Resources department and Corporate Equalities Group to ensure that it engages with hard-to-reach groups in the best way.

Development Plan Documents

- 3.16 Tables 3.3 to 3.8 detail the required stages of the preparation of a Development Plan Document (DPD) and the consultations that the Council will carry out. The requirements meet or exceed the minimum legislative requirements.
- 3.17 Depending on the circumstances of an individual document and availability of resources, the actual level of consultation may be further increased.

Table 3.3: STAGE 1. Pre-publication and evidence gathering

Description	Consultation
<p>Information is gathered to support the preparation of the DPD, including the development of an evidence base, and the identification of potential issues and options. One or more draft documents relating to the DPD may be produced and consulted on</p>	<ul style="list-style-type: none"> • Notify relevant consultees of how they can make comments about what the DPD should contain and the date by which comments must be submitted • Where appropriate and where resources allow, hold exhibitions, public meetings and/or focus groups • If a draft document relating to the DPD is published: <ul style="list-style-type: none"> ○ Consult on the document for an appropriate length of time ○ Make the document available for viewing ○ Notify relevant consultees of what the document is about, where and when it can be viewed, how they can make comments on it and the date by which comments must be submitted ○ Publish a notice and/or article in the <i>Harlow Star</i>, detailing what the document is about, where and when it can be viewed, how comments on it can be made and the date by which comments must be submitted ○ Once the consultation is complete, produce a Consultation Summary Report detailing the consultation process, the responses received and how the responses have been considered

Table 3.4: STAGE 2. Publication of the DPD

Description	Consultation
Taking into account the outcomes of Stage 1, one or more drafts of the DPD are produced, published and consulted on	<ul style="list-style-type: none"> • Consult on the DPD for of a minimum period of six weeks • Make the DPD available for viewing • Notify relevant consultees of what the DPD is about, where and when it can be viewed, how they can make comments on it and the date by which comments must be submitted • Publish a notice and/or article in the local press detailing what the DPD is about, where and when it can be viewed, how comments on it can be made and the date by which comments must be submitted • Where appropriate and where resources allow, hold exhibitions, public meetings and/or focus groups • Once the consultation is complete, produce a Consultation Summary Report detailing the consultation process, the responses received and how the responses have been considered

Table 3.5: STAGE 3. Submission of the DPD

Description	Consultation
The submission version of the DPD is submitted to the Secretary of State	<ul style="list-style-type: none"> • Make the DPD available for viewing • Notify consultees who were notified at Stages 1 & 2 (including people who have requested notification of the submission of the DPD) that it has been submitted, and where and when it can be viewed

Table 3.6: STAGE 4. Public Examination

Description	Consultation
The submitted DPD is examined in public by the independent Planning Inspector, who tests it to ensure it is sound, has a robust evidence base to support it and has been prepared in accordance with the adopted SCI	<ul style="list-style-type: none"> • Six weeks before the start of a public hearing (held by the Planning Inspector), notify any consultee who has made a representation on the DPD of the name of the Inspector, and where and when the public hearing is being held • The Inspector may invite the Council to make modifications to documents, which would be consulted on by the Planning Inspector

Table 3.7: STAGE 5. Publication of Inspector's Report

Description	Consultation
Following the Public Examination, the Inspector produces a Report setting out any changes the Council must make to the document(s)	<ul style="list-style-type: none"> • Make the Inspector's Report available for viewing • Notify consultees who have requested notification of publication of the Inspector's Report that it has been published

Table 3.8: STAGE 6. Adoption

Description	Consultation
Following the publication of the Inspector's Report, the Council makes any changes requested by the Inspector. The document is then adopted by Councillors at a public council meeting	<ul style="list-style-type: none"> • Make the adopted DPD available for viewing • Send a copy of the Adoption Statement to the Secretary of State and to consultees who have requested notification of the adoption of the DPD

Notes:

- Any document made available for viewing is available for inspection at public places in Harlow (e.g. the Civic Centre or Harlow Central Library) and on the Council's website
- Notifications are sent via email and/or letter
- 'Relevant consultees' are detailed at paragraphs 3.20 to 3.23

Supplementary Planning Documents

- 3.18 Tables 3.9 to 3.11 detail the process of the preparation of a Supplementary Planning Document (SPD) and the required consultation. The requirements meet or exceed the minimum legislative requirements.
- 3.19 Depending on the circumstances of an individual document and availability of resources, the actual level of consultation may be further increased.

Table 3.9: STAGE 1. Pre-publication and evidence gathering

Description	Consultation
Required information is gathered to support the preparation of the SPD	<ul style="list-style-type: none"> • Notify relevant consultees of how they can make comments about what the SPD should contain, and the date by which comments must be submitted • Where appropriate and where resources allow, hold exhibitions, public meetings and/or focus groups

Table 3.10: STAGE 2. Publication of a draft document

Description	Consultation
Taking into account the outcomes of Stage 1, a draft SPD is produced	<ul style="list-style-type: none"> • Consult on the SPD for of a minimum period of four weeks • Make the SPD available for viewing • Notify relevant consultees of what the SPD is about, where and when it can be viewed, how they can make comments on it and the date by which comments must be submitted • Publish a notice and/or article in the <i>Harlow Star</i>, detailing what the SPD is about, where and when it can be viewed, how comments on it can be made and the date by which comments must be submitted • Where appropriate and where resources allow, hold exhibitions, public meetings and/or focus groups • Once the consultation is complete, produce a Consultation Summary Report detailing the consultation process, the responses received and how the responses have been considered

Table 3.11: STAGE 3. Adoption

Description	Consultation
Following consideration of representations received during Stage 2, the SPD is modified. It is then adopted by Councillors at a public council meeting	<ul style="list-style-type: none"> • Make the adopted SPD available for viewing • Send a copy of the Adoption Statement to the people who have requested notification of the adoption of the document

Notes:

- Any document made available for viewing is available for inspection at public places in Harlow (e.g. the Civic Centre or Harlow Central Library) and on the Council's website
- Notifications are sent via email and/or letter
- 'Relevant consultees' are detailed at paragraphs 3.20 to 3.23

Relevant consultees

3.20 Current relevant legislation categorises consultees into specific consultees and general consultees. It states that, in the preparation of a planning policy document (specifically Development Plan Documents), local planning authorities must:

- consult with specific consultees which are considered to have an interest in the subject of the document;
- consult with general consultees which are considered appropriate; and
- consult with residents or others carrying on business which are considered appropriate to invite comments.

3.21 Paragraphs 3.22 and 3.23 list the types of specific and general consultees for Harlow. The contact details of the individuals and groups are stored internally and updated when a consultation takes place to ensure consultations are carried out correctly and appropriately. The lists are therefore not an exhaustive guide of who may be consulted.

3.22 Specific consultees

- Relevant and adjoining county councils
 - Essex County Council
 - Hertfordshire County Council
- Neighbouring district, city and/or borough councils
 - Epping Forest District Council
 - East Hertfordshire District Council
- Town / parish councils (note: there are none within the Harlow district)
 - Sawbridgeworth Town Council
 - Eastwick and Gilston Parish Council
 - Epping Upland Parish Council
 - Hunsdon Parish Council
 - Matching Parish Council
 - Nazeing Parish Council
 - North Weald Bassett Parish Council
 - Roydon Parish Council
 - Sheering Parish Council
- Electronic communication suppliers
 - British Telecom
 - Mobile Operators Association
- Electricity suppliers
 - EDF Energy Networks
- Gas suppliers
 - Transco

- British Gas
- Sewerage undertakers and water suppliers
 - Thames Water Utilities
 - Lea Valley Water plc
 - Three Valleys Water
- Local policing body
- Utility companies (e.g. power suppliers, gas suppliers)
- NHS England
- Coal Authority
- Environment Agency
- Historic England
- Sport England
- Natural England
- Network Rail Infrastructure Limited
- Highways England
- Homes and Communities Agency

3.23 **General consultees**

- Racial, ethnic or national organisations, including Harlow Ethnic Minority Umbrella and the Harlow and District Chinese Association
- Faith groups and churches
- Disability and access groups
- Mental health groups
- Older people groups
- Youth groups
- Woman's groups
- Gay, lesbian and transgender groups
- Gypsy and traveller groups
- Schools, colleges and other education/training providers
- Health groups
- Sports organisations, including Sport England
- Historical/archaeological groups
- Residents/tenants associations
- Housing associations
- Environmental and wildlife groups
- Business groups
- Developers, landlords, landowners and planning consultants/agents and other stakeholders who have expressed an interest in the preparation of the document(s)
- Democratically elected Members of the Council
- Others
 - Public transport companies
 - Community transport providers
 - House builders
 - East of England Ambulance Service
 - Essex Fire and Rescue
 - Arts organisations
 - Citizens Advice Bureau
 - Local branches of professional institutions

- Anyone who has previously made a comment on a document which will form part of the HLDP and/or has been placed on the Council's consultation portal database, and has requested to be kept informed

Duty to Co-operate

- 3.24 National legislation and guidance is clear that Local Planning Authorities and other public bodies must engage constructively, actively and on an ongoing basis with each other on a number of cross-boundary matters during the preparation of Local Plans. Such matters include the provision of necessary transport, healthcare and education infrastructure.
- 3.25 The duty to co-operate is not a duty to agree, but Local Planning Authorities must make every effort to secure the necessary cooperation of cross boundary matters. The Council's compliance with the Duty to Co-operate will form part of the Inspector's decisions on whether documents which are subject to examination are sound.
- 3.26 The bodies which the Council is required to engage with under the duty to co-operate includes, but is not limited to, the following:
- Essex County Council
 - Epping Forest District Council
 - East Hertfordshire District Council
 - Uttlesford District Council
 - Environment Agency
 - English Heritage
 - Homes and Communities Agency
 - NHS England / West Essex CCG

4. Development Management

- 4.1 The Planning Department is responsible for determining applications received by the Council. These decisions therefore shape the character of the district – now and for generations to come. As there are often differing views and competing interests on proposals, it is the Council’s role to make an informed decision on what outcomes will be in the best interest of the community, having regard to local planning policies for the area and the potential impacts of the proposal.
- 4.2 An application is made to the Council for a specified form of development. There are various types and scales of development proposed, these are outlined in tables 4.3 and 4.4.. Each year, the Council receives and determines hundreds of applications.

Pre-application

- 4.3 Many residential and commercial works, including changes to the exterior of properties and erection of new buildings, require planning permission prior to the works being carried out. A ‘Do I need planning permission?’ form can be submitted to the Planning Department, via the Council’s website, to ascertain whether planning permission for particular types of work or land uses are required before any changes or works can commence.
- 4.4 A Case Officer in the Planning Department will check the history of the property which is the subject of the pre-application submission, whether the property is covered by any restrictions such as Article 4 Directions, and whether the proposed development is classed as permitted development. A response is given within eight weeks, but may be issued sooner depending upon available resources.
- 4.5 It is important to note that aside from permission from the Planning Department, other consents may also be required, such as Covenant Control consent and Building Regulations consent, before commencing any development works. More information on this can be obtained by checking with the Planning Department and by contacting the Council’s Covenant Control and Building Control Departments. Contact details are available on the Council’s website at www.harlow.gov.uk/planning-building
- 4.6 There is currently no charge for seeking pre-application advice, although an appropriate fee may be introduced at a later date. Seeking pre-application advice is pro-actively encouraged, as it is a useful way of identifying and resolving possible issues at an early stage and obtaining an understanding of the likely key issues. It also provides an opinion regarding the principle of the proposed schemes, and ensures that submitted applications are of a high quality and contain the required information, This helps to streamline the application process.
- 4.7 Any views expressed by Case Officers during the pre-application process are informal and are not binding on any subsequent decision that is made by the Council. Additionally, to ensure impartiality is retained, the Planning Department

is not able to offer advice on which architects, planning consultants and/or other consultants should be employed in the preparation of a planning application. Information on these is available online and through the Yellow Pages.

4.8 It is expected that for large scale major and departure applications that the applicants carry out a pre application consultation. This may involve public meetings, exhibitions, development briefs and leaflets to inform the public of their proposals, as appropriate. A number of online resources are available to suggest ways to involve and inform the community. A planning application is considered to be a 'departure application' if it is not in accordance with the provisions and policies of the adopted Local Development Plan. If you are unsure what type of planning application your proposal is, contact the Planning Department to check.

4.9 Such pre-application consultation allows applicants and developers to gather the views of local residents about their proposals, which can be taken into account in the preparation of the application before it is formally submitted to the Council. The Planning Department suggest that the details and results of all consultation and involvement exercises are reported in a statement in the applicant's application. The Planning Department does not get involved with this type of pre-application consultation, to ensure an impartial position is retained.

Application stage

4.10 When an application has been submitted to the Council, it will be registered, validated and assigned to a Case Officer, and any relevant consultees will be notified of the application.

Development Management Consultation Methods

4.11 Table 4.1 indicates the ways in which the Council will consult on applications. These methods meet or exceed the minimum legislative requirements. Depending on the circumstances of an individual case and availability of resources, the actual level of consultation may be further increased.

Table 4.1: Development Management Consultation Methods

	<p>Website</p> <p>On the Council's website, each application is available to view, with details of the application, progress of determination, relevant documents and drawings, and information on how to comment on the application. Once an application has been determined, the Case Officer's report will also be published online, with the decision notice which contains any conditions imposed if permission is granted. Comments made by others as part of the consultation are also available to view. Full information for older applications may not be available to view online (contact the Planning Department if you are unable to find the information you are looking for). The Council's website also includes a weekly list of all applications which have been</p>
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	received and applications which have been determined
	Local Media Press notices advertising certain applications are published in the local media. This will include details of the application, the dates of the consultation and how to make comments.
	Site Notices Site notices for certain applications are displayed in close proximity to the application site
	Council meetings Certain applications will be discussed by Councillors at the Development Management Committee. These are public meetings which anyone can attend, although those wishing to speak must first notify the Governance Support Section, at least 24 hours in advance of the meeting. This is in accordance with part 4, rule 19.2 of the Council's Constitution.
	Neighbour Notifications In some cases properties adjoining a site relating to a submitted application will be notified of the application by letter and given guidance on how to make comments

Table 4.2 details the exact consultation requirements for different types of application.

Table 4.2: Types of Application

DEVELOPMENT TYPE			DEVELOPMENT CATEGORY
Dwellings	<i>Number of residential units</i>	<i>Site area (where number of units unknown)</i>	
	200 or more	O R 4 ha or more	LARGE-SCALE MAJOR
	10 to 199	O R 0.5 ha or more but less than 4 ha	SMALL-SCALE MAJOR
	1 to 9	O R less than 0.5 ha	MINOR
Offices/ Research & Development/ Light industry; General industry/ storage/ warehousing; Retail distribution and servicing	<i>Floor space to be built</i>	<i>Site area</i>	
	10,000 m ² or more	O R 2 ha or more	LARGE-SCALE MAJOR
	1,000 m ² or more but less than 10,000 m ²	O R 1 ha or more but less than 2 ha	SMALL-SCALE MAJOR
	less than 1,000 m ²	O R less than 1 ha	MINOR
Gypsy and Traveller Pitches	<i>Number of pitches</i>	<i>Site area (where number of units unknown)</i>	
	200 or more	O R 4 ha or more	LARGE-SCALE MAJOR
	10 to 199	O R 0.5 ha or more but	SMALL-SCALE

		less than 4 ha	MAJOR
	1 to 9	less than 0.5 ha	MINOR
All other large scale major, small scale major or minor developments	<i>Floor space to be built</i>	<i>Site area</i>	
	10,000 m ² or more	2 ha or more	LARGE-SCALE MAJOR
	1,000 m ² or more but less than 10,000 m ²	1 ha or more but less than 2 ha	SMALL-SCALE MAJOR
	less than 1,000 m ²	less than 1 ha	MINOR

4.12 Table 4.3 prescribes the neighbour notification requirements for an application, depending on the development category it falls under. The requirements meet or exceed the minimum legislative requirements. Depending on the circumstances of an individual case and availability of resources, the actual level of neighbourhood notification may be further increased.

Table 4.3: Neighbour Notification Requirements for Application

DEVELOPMENT CATEGORY	NOTIFICATION
LARGE-SCALE MAJOR DEVELOPMENTS	Press notice and either a letter to all properties within 80 metres of the site boundary and a site notice
SMALL-SCALE MAJOR DEVELOPMENTS	Press notice and either a letter to all properties within 40 metres of the site boundary and a site notice.
MINOR DEVELOPMENTS	A letter to all properties within 40 metres of the site boundary and a site notice
OTHER PROPOSALS	See Table 4.4

4.13 **In addition to the requirements for the types of development listed above, site notices are also displayed and a press notice published in the local media if the planning application:**

- **is a departure from the adopted local plan (i.e. it is not in accordance with it); or**
- **is an Environmental Impact Assessment application accompanied by an environmental statement; or**
- **affects a public right of way.²**

4.14 Table 4.4 prescribes the type of neighbour notification which will be issued for types of application not detailed above. The requirements meet or exceed the minimum legislative requirements. Depending on the circumstances of an individual case and availability of resources, the actual level of neighbourhood notification may be increased further.

Table 4.4: Neighbour Notification Requirements for Application categorised as 'Other Proposals'

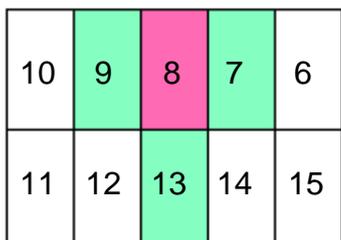
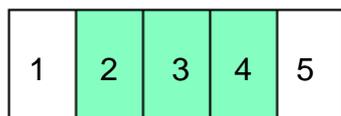
² As defined by part 3 of the Wildlife and Countryside Act 1981

OTHER PROPOSAL TYPE:		NOTIFICATION
All Change of Use applications		Letter to all abutting properties and site notice
Householder developments	Including extensions, conservatories, loft conversions, outbuildings and garages	Letter to all abutting properties
Advertisements	Including posters, notices, signs and displays of certain types and sizes	Letter to all abutting properties
Listed Building Consents	To alter or extend a listed building, or carry out partial or whole demolition	Letter to all abutting properties and site notice
Conservation Area Consents	Whole demolition of a building in a conservation area.	Letter to all abutting properties and site notice
Certificates of Lawful Development	Establishing whether the existing or proposed use of a building is/will be lawful with no need for planning permission	No notification
Discharge of Planning Conditions		No notification
Notifications of Prior Approvals	Details of certain schemes, including telecommunications and changes of use, are submitted to the Council	Letter to all abutting properties
Hedgerows	Works on hedgerows	Letter to all abutting properties
TPO or TCA Works	Works on trees which are protected by Tree Preservation Orders or within Conservation Areas	Letter to all abutting properties
Any application which is a departure from the Local Plan. (I.e. it is not in accordance with it).		Site notice and press notice.
An Environmental Impact Assessment accompanied by an Environmental Statement.		Site notice and press notice.
Any application which affects a public right of way. ³		Site notice and press notice.
Any application affecting a Listed Building or Conservation Area or their setting.		Site notice and press notice.

Fig. 4.1 demonstrates the properties which will be sent letters when the requirement is for a letter to be sent to all abutting properties.

³ As defined by part 3 of the Wildlife and Countryside Act 1981

Fig. 4.1: Neighbourhood Notification Example



In the example on the left, property 8 is the property to which the planning application relates. The following properties would be consulted:

- Numbers 2 – 4 (opposite and diagonally opposite at the front)
- Numbers 7 & 9 (abutting either side)
- Number 13 (abutting to rear)

Other properties may also be consulted if there are overlapping boundaries

Other Consultees

4.15 There are a number of organisations which the Council are required to consult with to seek their professional views on a submitted application, depending on the type and scale of the application. The requirements for which organisations will be consulted and when are set out in the relevant planning legislation. The organisations which may be consulted by the Council include, but are not limited, to the following:

- An adjoining district, town, borough or city council
- An adjoining parish or town council
- The British Waterways Board
- Historic England
- The Environment Agency
- Essex County Council
- The Health and Safety Executive
- Local railway operator
- Natural England
- Highways England
- Sport England
- The Theatres Trust

4.16 In addition, depending on the type and scale of the application, Harlow Council may also consult the following non-statutory bodies:

- Campaign for the Protection of Rural England
- Civil Aviation Authority
- Department for the Environment, Fisheries and Rural Affairs
- Essex County Fire & Rescue Service
- Essex Police
- Essex Wildlife Trust
- Harlow Council departments (including Properties and Facilities, Environmental Health and Regeneration)

- Local organisations (including residents associations, the Harlow Area Access Group and the Harlow Civic Society)
- Member of Parliament for Harlow
- NHS England / NHS West Essex Clinical Commissioning Group (where the application is for 50 or more dwellings, or is for C2 use)
- Utilities companies (e.g. electricity/water suppliers)

Commenting on Applications

- 4.17 Anyone can make a comment – positive or negative – on a planning application. Any material planning considerations will be taken into consideration by the Case Officer during the determination of the application, potentially resulting in changes being made to the proposal, conditions being added to grant of permission, or refusal of the application. Comments which are non-material and not related to planning issues, such as effects on property value, cannot be considered.
- 4.18 Comments must be made in writing before the specified end date of the consultation and must include your name and address. They can be emailed to planning.services@harlow.gov.uk or sent by post or by hand to Harlow Council, Civic Centre, Water Gardens, Harlow, CM20 1WG.
- 4.19 Late comments submitted after the end date of the consultation may be accepted up until the time at which the application is determined. The Local Planning Authority is able to determine any application following the expiry of the consultation period, in accordance with the adopted Scheme of Delegation, as set out within the Council's Constitution.
- 4.20 Anonymous or confidential comments cannot be taken into account. All written comments on an application will only be acknowledged if an acknowledgement is requested. Any person who comments on an application will be notified of any decision made by the Council on the application, including if the application is to be considered at the Development Management Committee.
- 4.21 The planning system is a transparent process. Therefore, when you respond to a public consultation, comments and information you submit – as well as your name – will be made available for public inspection in relevant files. They may also be made available on the Council's website. Certain information will be redacted before it is published online. All information received during public consultations is held by the Council in accordance with the Data Protection Act 1998 and the Freedom of Information Act 2000.
- 4.22 Case Officers must remain impartial regarding commenting on applications and therefore cannot advise you on comments you wish to make. Officers will, however, be able to clarify any planning-related questions you may have about the application. In exceptional circumstances, for example when consulting with hard-to-reach groups, a face-to-face meeting with the Case Officer at the Civic Centre may be arranged, subject to availability of resources.
- 4.23 The consultation period for most planning is 21 days (14 days for some applications). Notification letters will state when responses need to be returned

to the Council. Where legislation requires, a longer period of time will be given to certain bodies.

Decision stage

- 4.24 Many applications are determined by the Planning & Building Control Manager (or when absent, the Development Manager), based on the recommendations in the Case Officer's report. The report assesses whether the proposal is acceptable in accordance with local and national policies. Comments made by members of the public and organisations, as well as other material considerations, are also considered. Based on these assessments, a recommendation is made in the report with reasons for why that recommendation has been made.
- 4.25 Most applications will be determined within an 8-week timeframe, although for applications for major types of development, this is extended to 13 weeks and 16 weeks for applications for Environmental Impact Assessment development. Following the determination of an application, a decision notice is produced which specifies the decision, the approved plans, conditions attached to the planning permission and reasons for the conditions.
- 4.26 When the final decision on an application has been made, all those who commented on it will be informed of the decision and any conditions or reasons relating to the granting or refusing of permission.
- 4.27 In some circumstances, applications will be determined by the Development Management Committee, which is a body of democratically elected Council Members. In this case, the Committee Members are guided by the report and recommendation produced by the Case Officer. The application will then be discussed and decided at a meeting of the Committee which the public can attend. Members of the public are allowed to speak at these meetings for a maximum of three minutes per person (with up to three parties in favour of a proposal and up to three parties against a proposal), as long as they have registered their interest to do so with the Council by 4pm on the day before the Committee.
- 4.28 The circumstances in which the Committee determines applications are set out in the Council's Development Management Scheme of Delegation, which is available on the Council's website, under the Council's Constitution.
- 4.29 Applications are occasionally revised after they have been submitted. Most revisions are minor and do not require re-consultation, but interested parties will generally be informed of the revisions. For more major changes, the Council will re-consult those people originally notified of the application, typically with a 10-day period of consultation. If the changes are significant, the applicant may be requested to withdraw the application and submit a new one.

Post-decision stage

- 4.30 If an applicant is unhappy with the decision that the Council has made on their application, they can appeal to the Planning Inspectorate. Applicants may

appeal when an application has been refused, if an application has not been decided by the target deadline, or if they are unhappy with any conditions that have been placed on a permission.

- 4.31 If an applicant is unhappy with way their application has been processed and considered, they can complain using the Council Complaints Procedure and, if need be, can also involve the Local Government Ombudsman. More information on this is available on the Council's website.
- 4.32 In the event of an appeal, those who were previously notified about the application will be informed of the appeal process and how they can be involved. A Planning Inspector, on behalf of the Secretary of State for Communities and Local Government, will allow or dismiss the appeal (i.e. grant or refuse permission), based on evidence supplied to them.

Breaches in Planning Control

- 4.33 Anyone who has concerns that any works being carried out are in breach of the relevant planning controls can contact the Planning Department to report the suspected breach. An enforcement case will be opened and the matter will be investigated, with site visits being undertaken and, where breaches of planning control have been identified, enforcement action will be taken. Anonymous comments or reports cannot be accepted. All initial complaints are dealt with in confidence and details of the complainants will not be made known without their agreement. However, the substance of the complaints themselves is not confidential. In some cases it may be necessary to rely on evidence from complainants in order to take action.

5. Glossary

This Glossary provides information on the terms and acronyms which may be used throughout letters and documents published or issued by the Forward Planning and Development Management teams. Specific documents may also contain a separate glossary to further ease reading.

AAP	Area Action Plan	A document that provides a planning framework for areas where significant change is needed or anticipated
AMR	Authority Monitoring Report	Assesses the effectiveness of Local Development Plan policies, including the types & numbers of planning applications determined and housing completions each financial year
CIL	Community Infrastructure Levy	A means of securing planning obligations, supported by documents setting out how sums of money for various infrastructure projects would be apportioned and how the levy is calculated
DCLG	Department for Communities and Local Government	Central Government department responsible for preparing legislation and guidance on town planning
DPD	Development Plan Document	A certain type of document that forms part of the Local Development Plan
Duty to co-operate		Under the Localism Act 2011, the Council has a legal duty to engage constructively, frequently and actively with specified bodies during Local Development Plan preparation
EA	Environment Agency	National body which protects and improves the environment and promotes sustainable development
Examination in Public		An interrogatory process led by the Planning Inspectorate to examine the soundness of a DPD
GPDO	General Permitted Development Order	An order which sets out certain permitted development rights which allow changes to happen to a property without the need for planning permission
LDS	Local Development Scheme	Sets out a programme for preparing documents related to the Local Development Plan
Local Development Plan		The statutory development plan for the district which sets out long-term spatial visions and the associated policies. It comprises DPDs and other documents such as SPDs and the SCI
Localism Act		The Act details Central Government's agenda for decentralisation and democratic engagement, by empowering councils, communities and individuals
Neighbourhood Plan		A plan produced by a designated neighbourhood forum with the support of local people
NPPF	National Planning Policy Framework	National government policy on planning issues. The NPPF was introduced in 2012 and replaced most existing national policies and guidance
NPPG	National Planning Practice Guidance	National government guidance on planning issues, introduced in 2014

Planning Inspectorate		National body which undertakes planning appeals, examinations and inquiries
Policies Map		A map which illustrates the policies contained in the Local Development Plan and visually displays any designated areas (such as employment areas and areas of ecological importance)
S106	Section 106 agreement	A legal agreement, following negotiation with applicants who have planning permission, which secures the delivery of community benefits, such as the physical construction of facilities
SA	Sustainability Appraisal	The appraising of the potential social, environmental and economic impacts of policies to ensure they are in accordance with sustainable development objectives
SCI	Statement of Community Involvement	Details the Council's commitment to consulting local people, businesses and organisations on planning matters, including the determining of planning applications and the preparation of planning policies
SEA	Strategic Environmental Assessment	Formal environmental assessments applied to policies, plans and programmes
SHLAA	Strategic Housing Land Availability Assessment	Assessment which determines the availability and viability of potential housing sites
SHMA	Strategic Housing Market Assessment	Assessment which provides evidence on the types of housing that are needed to meet current and future demand
SPD	Supplementary Planning Document	Provides supplementary information to the policies contained in the Local Development Plan
TCA	Tree within a Conservation Area	A tree or trees situated in an area of notable environmental or historical interest or importance which is protected by law against undesirable changes. The Conservation Area status gives automatic blanket protection to all trees that fall within its boundary.
TPO	Tree Preservation Order	An order which preserves a single or a group of trees, meaning the tree(s) cannot be topped, lopped or felled without consent

Appendix 1: SCI Draft Review consultation

A draft of this SCI was consulted on in conjunction with the Emerging Strategy and Further Options consultation for the emerging Local Development Plan. As such, the SCI Draft Review consultation ran for a period of six weeks from 14 April to 30 May 2014, and was advertised on the Council's website and in the local press.

2,381 letters and emails were sent to consultees to notify them of the Emerging Strategy consultation, and the letters and emails included details of the SCI Draft Review consultation, how comments could be made and when they must be made by.

Responses from two organisations were received regarding the SCI Draft Review and resulting modifications were made, as follows:

Respondent	Comments	Officer Response
Natural England	We are supportive of the principle of meaningful and early engagement of the general community by the public, community and other organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications. We regret we are unable to comment, in detail, on individual Statements of Community Involvement	Noted
West Essex CCG and NHS England (agent: Lawson Planning Partnership)	Welcome the Council's pro-active encouragement of applicants to seek pre-application advice	Noted
	Development Management: It is requested that a list of 'statutory' consultees is included in the SCI	SCI Draft Review amended accordingly
	Development Management: It is requested that a list of suggested 'other main consultees for planning applications' is added to the SCI and that NHS England is included within this list.	SCI Draft Review amended accordingly
	Development Management: Concerning planning application consultations, NHS England should be consulted on Class C3 residential development (all tenures) comprising 50 or more dwellings; and all Class C2 development	SCI Draft Review amended accordingly

In addition to the amendments to the SCI Draft Review outlined above, a number of other small modifications (including layout alterations and wording changes) were made to increase the clarity of the document.

Appendix 2: Minor amendments- February 2016

In February 2016 a few minor amendments were made to the document. These amendments were not consulted on as they caused no changes to standards or to policies set out within the document. The changes were made to increase the clarity of the document and make it as user-friendly as possible. Where relevant, updates were also made to the list of specific consultees. For example English Heritage has now changed its name to Historic England. The full list of changes is outlined in the table below:

Amendment	Reason for Amendment
Table 3.2 Under 'Social Networking', 'Council Facebook and Twitter accounts' has been changed to 'Council's social media accounts'	Other/new forms of social media may be used in future.
Table 3.4, Table 4.1 'Harlow Star' and been changed with 'local press' or 'local media'	Other/new publications may be used in future.
Paragraph 3.22 and Paragraph 4.15 Consultees list has been updated. 'English Heritage' has become 'Historic England', 'The Marine Management Organisation' has been removed, and 'Highways Agency' has become 'Highways England'.	Organisations have changed their names since this publication of this document in 2014. The Marine Management Organisation are not a specific consultee for Harlow.
Paragraph 3.26 'Uttlesford District Council' were added to the list of Duty to Cooperate bodies.	Uttlesford have been identified with the same Housing Market Area as Harlow, Epping Forest and East Hertfordshire.
Paragraph 4.2 Examples of development were removed.	This is to avoid confusion and duplication as the information is provided in Tables 4.3 and 4.4.
Paragraph 4.9 Reference to the Localism Act 2011 removed	Pre-application advice within the Localism Act was withdrawn in 2014.
Table 4.1 the appropriate details for those wishing to speak at Development Management Committee have been clarified.	This now matches the wording in the Council's Constitution.
Paragraphs 4.13 and 4.14 removed	Reference to Code of Practise for Publicity and Neighbourhood Notifications is no longer relevant as these standards are set out in this document.
Paragraph 4.18 moved to underneath Table 4.3	It is relevant to the content of Table 4.3
Paragraph 4.25 Clarification that comments and information are available both in hard copies and online.	This is to avoid confusion.
Paragraph 4.37 Title added.	To clarify that paragraph 4.37 related to Breaches in Planning Control rather than Post-decision stage.

Appendix G

The Harlow Local Development Scheme

Harlow Council is required to prepare a Local Development Scheme under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). This must specify (among other matters) the documents which, when prepared, will comprise the Local Plan for the area. It must be made available publically and kept up-to-date so that the local community and interested parties can keep track of progress.

The following Development Plan Documents comprises the Local Development Scheme for Harlow.

1. Harlow Local Plan

Purpose	<p>The Local Plan provides the overall spatial planning vision for the district and a framework to guide future development in the area for the period up to 2033. This is reflected by a series of planning objectives and supported by a range of strategic and development management policies which are given spatial expression in the Policies Map.</p> <p>The emerging policies will consider housing need, the economy, community facilities and infrastructure – as well providing the basis for safeguarding the environment, adapting to climate change and securing good design.</p> <p>The Local Plan policies and proposals are based on evidence that considers the socio-economic and environmental characteristics of the district.</p> <p>The Plan will also provide the spatial expression of the Corporate Plan.</p>
Which “saved” policies will it replace?	All policies in the Adopted Replacement Harlow Local Plan July 2006.
Geographical coverage	District wide, with the exception of Harlow Town Centre which is subject to an Area Action Plan.
Status	Development Plan Document
Conformity	Must be consistent with the National Planning Policy Framework and Planning Practice Guidance.
Timetable	
Evidence gathering and identification of issues and options.	2010 - 2011
Issues and Options consultation	Issues and Options consultation (November 2010 – January 2011)

Further evidence gathering, consideration of implications arising from Localism Act 2011	
Emerging Strategy and Further Options consultation Participation with adjoining districts on strategic planning matters in accordance with the obligations of the Duty to Co-operate, set out in the Localism Act 2011	Emerging Strategy and Further Options consultation (April 2014 – May2014) Ongoing
Finalising Draft Local Plan and Sustainability Appraisal	Ongoing
Publication Regulation 19 Consultation on draft Local Plan - (6 weeks)	May 2018 - July 2018
Preparation of Submission Local Plan and Sustainability Appraisal	July 2018 – September 2018
Submission to Planning Inspectorate for Examination Regulation 22	September/October 2018
Examination in public Regulation 24	January 2019/February 2019 (Based on latest advise from PINs)
Receipt of Inspectors report Regulation 25	April/May 2019
Adoption & Publication (including Policies Map) Regulation 26	June 2019
2. Harlow Town Centre Area Action Plan	
Purpose	This Development Plan Document provides the spatial planning framework to guide development and secure the regeneration of Harlow town centre for the period up to 2033. This takes into account the key role the town centre performs across the wider Harlow area, reinforced by the need to accommodate additional retail provision, arising from increased housing growth being brought forward.
Which “saved” policies will it replace?	All
Geographical coverage	Harlow Town Centre
Status	Development Plan Document
Conformity	Consistent with national planning policy and planning practice guidance
Timetable	
Evidence gathering and consideration of issues and options	January 2017 – September 2017
Issues and Options consultation	Issues and Options consultation (October 2017 - November 2017)
Further evidence gathering and preparation of Preferred Option consultation document	December 2017 – January 2018

Preferred Option Regulation 18 consultation	June 2018 – August 2018
Evidence gathering and preparation of Publication Regulation 19 Consultation document	August 2018 – October 2018
Publication Regulation 19 Consultation	January 2019– March 2019
Preparation of Submission Local Plan and Sustainability Appraisal	March 2019 – May 2019
Submission to Planning Inspectorate for Examination Regulation 22	May 2019
Examination in public Regulation 24	Summer 2019 (subject to agreement with PINs on availability of resources to meet Examination Programme)
Receipt of Inspectors report Regulation 25	Autumn 2019
Adoption & Publication (including Policies Map) Regulation 26	Winter 2019
3. Other Documents	
Statement of Community Involvement (SCI)	Adopted September 2014
Local Development Scheme (LDS)	Adopted March 2018
Infrastructure Delivery Plan (IDP)	March 2018
Land north east of Harlow Development Brief	To be prepared
Harlow Garden Town Infrastructure Strategy	To be prepared
Garden Town Strategy (GTS)	Subject to DtC agreement
Supplementary Planning Documents (SPD)	
Affordable Housing SPD	Adopted March 2007 (to be updated)
Open Spaces, Sport and Recreation SPD	Adopted June 2007 (to be updated)
Harlow Design Guide SPD	Adopted October 2011 (to be updated)
The Stow Neighbourhood Centre Design Framework SPD	Adopted July 2016
Public Art SPD	To be prepared
Houses in Multiple Occupation (HMO's) SPD	To be prepared
Planning Obligations SPD	To be prepared
Local Development Orders (LDO's)	
London Road North (revised)	Adopted July 2014
London Road South (revised)	Adopted July 2014
Templefields North East (revised)	Adopted July 2014

Harlow Local Development Plan 2018
Duty to Cooperate Compliance Statement

(Section 110 of the Localism Act 2011 (which added section 33A of the Planning and Compulsory Purchase Act 2004))

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8. **Conclusion**

Appendices

Appendix A: Co-operation for Sustainable Development Board – Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area MoU, March 2017.

Appendix B: Co-operation for Sustainable Development Board – Highways and Transportation Infrastructure MoU, February 2017.

Appendix C: Co-operation for Sustainable Development Board – Managing the impacts of growth within the West Essex/East Herts Housing Market Area on Epping Forest Special Area of Conservation MoU, February 2017.

Appendix D: The Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area, May 2018

Appendix E: Co-operation for Sustainable Development Board – Terms of Reference, October 2014.

Appendix F: Cooperation for Sustainable Development Board – List of Meetings and key matters considered

Appendix G: Garden Town Member Board - Terms of Reference

Appendix H: Garden Town Member Board – List of Meetings

Appendix I: Harlow and Gilston Garden Town Spatial Vision (To be completed)

Appendix J: Harlow and Gilston Garden Town Design Charter (To be completed)

Appendix K: Harlow and Gilston Garden Town Transport Strategy (To be completed)

Appendix L: Harlow and Gilston Garden Town Sustainable Transport Corridor (To be completed)

Appendix M: Statements of Common Ground (to be completed)

1. Introduction

1.1 The Duty to Co-operate was introduced by the Localism Act 2011. Section 110 of the Localism Act 2011 (which added section 33A of the Planning and Compulsory Purchase Act 2004) requires local planning authorities to engage with other relevant local authorities and specified bodies on strategic matters through the preparation of development plan documents (DPDs) and other activities in connection with strategic matters which affect more than one area. This places a legal duty on local planning authorities to engage constructively with their neighbouring authorities and other bodies with regards to strategic cross boundary issues. National policy makes it clear that the Duty to Co-operate is not a 'duty to agree', but that every effort should be made to secure necessary cooperation before submission of a Local Plan to the Planning Inspectorate.

1.2 As part of a Local Plan examination, the Inspector will test whether a local planning authority has complied with the Duty to Co-operate. The Duty is separate from, but related to, the Local Plan tests of soundness. The tests of soundness, which are set out within the National Planning Policy Framework (paragraph35), assess whether a Local Plan is:

- Positively prepared
- Justified
- Effective; and
- Consistent with national policy.

1.3 In identifying whether a Local Plan is 'effective', the Inspector will assess whether effective joint working has taken place in order to address cross boundary issues.

1.4 This Duty to Co-operate Compliance Statement is intended to support the submission of the Harlow Local Development Plan (the Local Plan) by demonstrating that the requirements of the Duty have been met and that the Plan is consequently 'effective'.

2. Harlow Context

2.1 Harlow is a former Mark One New Town and a compact urban district with tight administrative boundaries, located within the west part of the County of Essex. It is adjoined by Epping Forest District to the east, south and west and by East Hertfordshire District to the north, which lies within the County of Hertfordshire (see map below).

2.2 Whilst a small district, and reflecting its evolution, it continues to fulfil an important sub regional role in the London Stansted Cambridge Corridor (LSCC), situated adjacent to the M11 and on the West Essex Mainline. It provides a range of activities and services for the wider area, including health, leisure and education facilities together with a strong employment base, reinforced by the designation of two Enterprise Zones and the recent decision taken by Public Health England to relocate to the town.

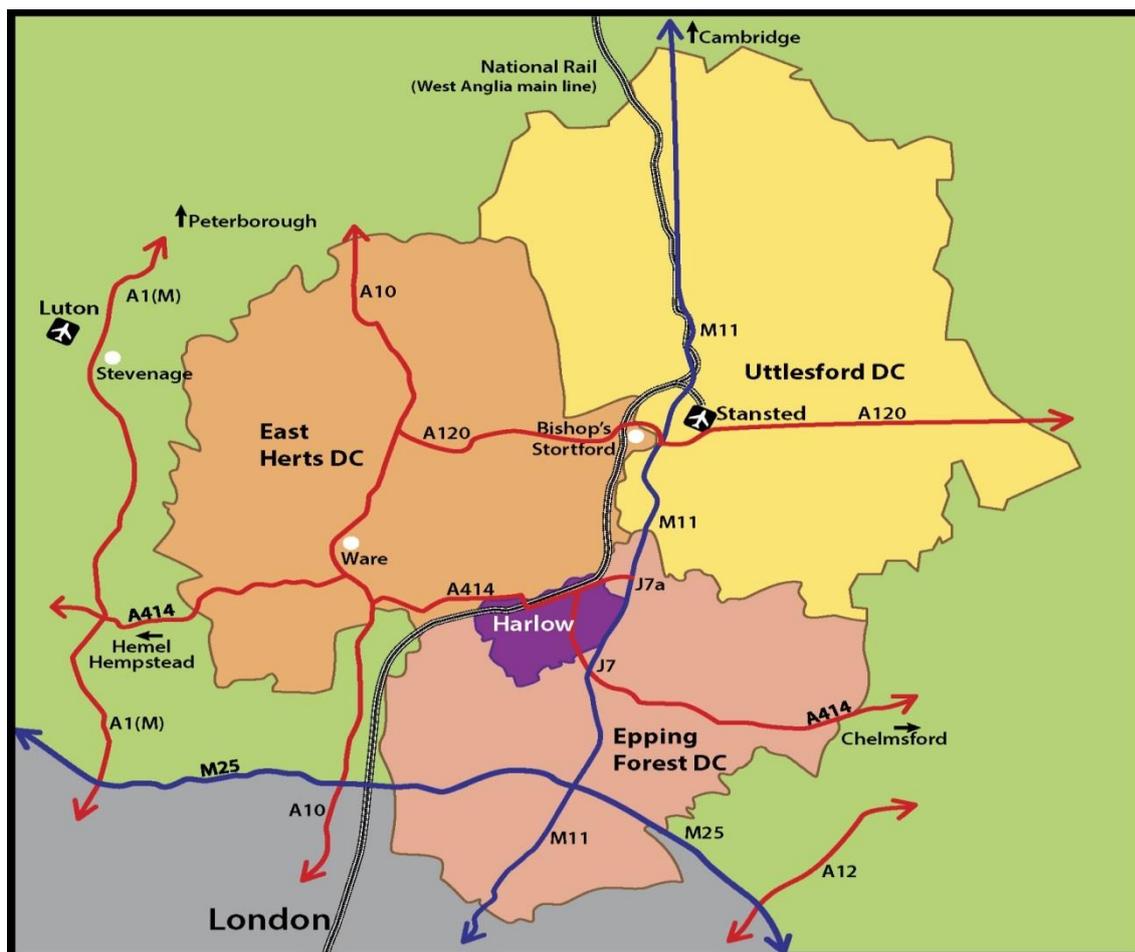
2.3 The town has had a strong legacy of partnership working with key bodies and organisations to support its growth and the development of its economic base and a wide range of community and other facilities. Its growth has, however, taken place within clear spatial planning principles established in the masterplan prepared by Sir Frederick Gibberd. This was influenced by the area's distinctive landscape character within which the town centre, residential neighbourhoods and

employment areas were accommodated, separated by Green Wedges and Green Fingers which provide a range of open spaces and habitats for nature.

2.4 Harlow is in need of regeneration in order to improve the quality and supply of housing, address ageing infrastructure and to create a thriving economy to reflect its key role and location in the LSCC. The Council is corporately committed to addressing these issues; however, the town district has tight administrative boundaries and is surrounded by Green Belt which historically has limited opportunities for growth.

2.5 During the preparation of the Local Plan it has been important, therefore, for Harlow to actively engage with all relevant bodies, including adjoining councils and other organisations in order to secure sustainable growth that will meet identified needs now and in the future. Ongoing joint working, which is described below, has culminated in Garden Town status being granted to Harlow and the surrounding area and it is anticipated that the principles being established through the Harlow and Gilston Garden Town work will provide a catalyst for long term and sustainable growth in the Harlow area.

2.6 Harlow Town Centre is being considered through the preparation of a separate development plan document, the Harlow Town Centre Area Action Plan (HTCAAP) Initial consultation has been undertaken on this document and the timetable is set out in the LDS.



3. The Duty to Co-operate

3.1 The Council has engaged throughout the plan making process with the relevant bodies and organisations including neighbouring planning authorities, during the course of the preparation of the Local Plan. This is based on the prescribed duty bodies are set out in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Of the bodies listed, the following are considered relevant to Harlow Council, and how the Council has engaged with them is considered throughout this statement:

- The Environment Agency
- Historic England
- Natural England
- Homes and Communities Agency (known as Homes England from January 2018)
- Essex County Council (the Education Authority , Highway Authority , Minerals and Waste Authority, Lead Local Flood Authority with responsibilities for Public Health and Social Services)
- Hertfordshire County Council
- Highways England?
- NHS West Essex
- West Essex Clinical Commissioning Group and NHS East and North Hertfordshire CCG

3.2 Given Harlow's tight administrative boundaries, therefore, it has been particularly important to work closely with East Hertfordshire, Epping Forest and Uttlesford District Councils, together with Essex and Hertfordshire County Councils on a range of strategic socio-economic and environmental matters. This culminated in the establishment of the Cooperation for Sustainable Development Board in 2014 and more recently in the convening of the Harlow and Gilston Garden Town Board in 2015, described in more detail below. This Board oversees the scoping and delivery of the Garden Town project, which has been actively supported by Government. Details of the Member level Cooperation for Sustainable Board meetings with neighbouring authorities are available on the Council's website: www.harlow.gov.uk/

3.3 Having regard to the overarching vision and objectives of the Harlow and Gilston Garden Town and in accordance with the requirements of the Localism Act 2011, the Council will continue to pro-actively co-operate with relevant bodies, including Essex County Council, Hertfordshire County Council the Environment Agency and Natural England over the coming months prior to the Local Plan Examination, and subsequently through the implementation phase.

4 Governance

The Co-operation for Sustainable Development Board (the Co-op Board)

4.1 The Co-op Board was established in 2014 as a mechanism for discussing cross boundary issues with neighbouring authorities in the East Herts/West Essex housing market area and beyond. The constituent authorities of the Co-op Board are identified below:

- The East Herts/West Essex housing market area partners (East Hertfordshire, Harlow, Uttlesford and Epping Forest District Councils);
- Hertfordshire and Essex County Councils;
- Broxbourne Borough Council
- Brentwood Borough Council
- The London Borough of Redbridge;
- The London Borough of Enfield; and
- The London Borough of Waltham Forest;

4.2 The Greater London Authority (GLA) has 'observer status'. Other organisations have also been engaged through the Co-op Board, as appropriate, including the Corporation of London (Conservators of Epping Forest), Chelmsford City Council, the Lee Valley Regional Park Authority and the London Stansted Cambridge Consortium (LSCC), the Highways Agency, Natural England, the Environment Agency and the Princess Alexandra Hospital.

4.3 The Co-op Board is a Member level forum which is supported by a separate Officer group. The terms of reference for the Co-op Board are included within Appendix E. The Board has been meeting regularly since 2015 and the matters considered and discussed are consequently reported to the relevant member decision making bodies of the respective local planning authorities. In the case of Harlow that is Cabinet and Full Council. This has included seeking endorsement of strategic matters agreed at the Board, including the identification of housing and employment needs and key infrastructure requirements, together with agreement on the most sustainable approach to site selection and an agreed approach to mitigating the potential impact of growth on the Epping Forest SAC. Board meetings that have been held are identified in appendix F.

Harlow and Gilston Garden Town

4.4 In March 2016, the Government published a prospectus entitled 'Locally Led Garden Villages, Town and Cities'. It invited local planning authorities to submit bids for technical and financial support in order to help facilitate the delivery of strategic sized developments within their administrative areas.

4.5 In response to the prospectus, and arising from discussions at the Co-operation for Sustainable Development Board, East Herts, Epping Forest and Harlow Councils, with support from the Advisory Team for Large Applications (ATLAS), submitted a joint expression of interest in relation to growth in and around Harlow. In January 2017 the Government announced that the Garden Town bid had been successful and awarded the joint working authorities £500,000 to carry out further technical work.

Garden Town Board

4.6 Following the Government award and discussions at the Co-operation for Sustainable Development Board it was decided that a Garden Town Member Board be established comprising East Herts, Epping Forest and Harlow Councils, with proactive support from Essex and Hertfordshire County Councils, in order to drive forward the Harlow and Gilston Garden Town initiative. This initiative acknowledged the quantum of growth that had been agreed by the respective councils in and around Harlow, where it was considered advantageous that Garden Town status could assist in the delivery of the growth in a co-ordinated and sustainable manner. The Board is supported by various officer working groups covering a range of work streams. The Board meets on a regular basis and has become a key area of continuous collaboration now and over the coming years for the authorities involved to ensure that a co-ordinated approach is taken in the development of appropriate spatial strategies for the Harlow and Gilston Garden Town area. Similar to the Co-operation for Sustainable Development Board the matters considered at the Garden Town Board are consequently reported to the relevant member bodies of the respective local planning authorities for endorsement.

4.7 This ongoing work has culminated in the recognition of the need for the establishment of a Garden Town team, led by a director, to co-ordinate the delivery of the Garden Town, in conjunction with the relevant technical teams of the partner Local Planning Authorities. To date this has included work on the development of a joint Spatial Vision, Design Charter, Transport Strategy and Sustainable Transport Corridor, Infrastructure and Viability Studies. These studies and documents will be complete and available for the examination.

5.0 Memoranda of Understanding (MoUs)

5.1 Arising from the joint work undertaken to date between the bodies specified above, and in accordance with the spirit of the Duty to Cooperate, four Memoranda of Understanding have been agreed with neighbouring authorities. These were considered by the Co-operation for Sustainable Development Board and endorsed by the respective councils. The MoUs, which can be found within the appendices, are described and summarised below:

- 1. Co-operation for Sustainable Development Board – Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area, March 2017¹ (Appendix A).** The purpose of this MoU is to ensure that the West Essex/East Hertfordshire Authorities (supported by Essex County Council, Hertfordshire County Council and Highways England), working together, fulfil the following requirements:
 - (i) to meet in full, the Objectively Assessed Housing Need of the West Essex/East Hertfordshire HMA, as assessed by the Joint SHMA (2015), within the HMA (taking account of availability, viability and deliverability);
 - (ii) to deliver the shared Strategic Vision for the LSCC 'Core Area', as set out in Appendix 5 and to include this Strategic Vision as part of the individual local plans;
 - (iii) to fulfil the commitment in the Joint Statements made by the Co-op Member Board in 2015, to "...work towards the production of a memorandum of understanding to support the joint working and meeting the duty to co-operate";
-

- (iv) to achieve item (i) above through the most sustainable pattern of development which is feasible, achievable and deliverable as assessed by the Spatial Options Study and other relevant evidence, by including the 'Spatial Option' for OAHN within individual Local Plans;
- (v) to continue to engage with one another at an early stage, in detail, and on a continuing basis, with the intention of avoiding possible objections being made at consultation stages and/or at Independent Examination of the individual Local Plans;
- (vi) to continue to co-operate during the implementation and monitoring of individual Local Plans;
- (vii) to commission any future joint evidence work which may be required;
- (viii) to help demonstrate compliance with the Duty to Co-operate during the Independent Examination of Authorities' Local Plans;
- (ix) to assist in securing necessary enabling strategic infrastructure for the growth set out in this MoU; and
- (x) to inform and support the 'Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area' MoU and the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation' MoU .

5.2 The outcome of this MOU is the agreement of the distribution of OAHN, as defined by the 2015 Strategic Housing Market Area assessment between East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils. This is fully in accordance with the spirit of the Duty to Co-operate, as set out in statute and Government guidance, in that it ensures that strategic priorities across local authority boundaries are properly coordinated, in this case the quantum and distribution of housing need.

2. Co-operation for Sustainable Development Board – Highways and Transportation Infrastructure, February 2017 (Appendix B) The purpose of this MoU is to ensure that Essex County Council, Hertfordshire County Council and Highways England (supported by the West Essex/East Hertfordshire authorities), together fulfil the following requirements:

1. to contribute to the delivery of the vision set out in section 3 of the MoU;
2. to seek/support/work towards addressing the strategic highway issues identified through modelling, and some of the emerging transport issues are outlined in section 4 of the MoU;
3. to work collaboratively to identify, develop and secure/deliver enabling highway infrastructure schemes supporting the 'Spatial Option' of the Objectively Assessed Housing Need within the West Essex/East Hertfordshire Housing Market Area, as set out above and within the overarching 'Distribution of Objectively Assessed Housing Need across the West Essex and East Hertfordshire Housing Market Area' MoU;
4. to continue to engage with the West Essex/East Hertfordshire Councils (primarily through the Co-operation for Sustainable Development Officer Group and the Co-operation for Sustainable Development Member Board) at an early stage, in detail, and on a continuing basis, with the intention of avoiding possible objections being

made at consultation stages and/or at Independent Examination of the individual Local Plans;

5. to continue to co-operate during the implementation and monitoring of the individual West Essex/East Hertfordshire Councils Local Plans;

6. to liaise with each other on any future joint evidence work which may be required to address the strategic highway issues;

7. To help demonstrate compliance with the Duty to CO-operate during the Independent Examination of the West Essex/East Hertfordshire authorities Local Plans.

5.2 This MoU specifically covers the area directly affected/impacted by the growth in and around Harlow and is NOT intended to cover the whole of the HMA, with specific district level interventions being identified by each district individually.

5.3 The outcome of this MoU is the identification of those major strategic highway schemes which would be required to meet the level of growth being proposed within and around the Harlow area. It does not include specific site level interventions, many of which may still be significant in themselves. Such matters will be considered through traffic impact assessments at the planning application stage.

3. Co-operation for Sustainable Development Board – Managing the impacts of growth within the West Essex/East Herts Housing Market Area on Epping Forest Special Area of Conservation, February 2017 (Appendix C)

The purpose of this MoU is to ensure that East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils, Essex and Hertfordshire County Councils, the City of London and Natural England, work in partnership to fulfil the following requirements:

- i. to collect and analyse data and evidence related to the impacts of proposed development and growth under the Local Plans to provide sufficient and robust evidence on which to base a strategy for the protection of Epping Forest SAC;
- ii. to commit to prepare a joint strategy, based on relevant available data and evidence and to an agreed timetable; and
- iii. to ensure that the joint strategy will address both the requirement to avoid, or effectively mitigate, adverse impacts on the integrity of the SAC from Local Plan-led development and the requirement to prevent deterioration of the SAC features.

5.4 The outcome of this MOU has been an agreement between the parties to work together to facilitate the collection of data and evidence in order to develop a Joint Strategy to address potential adverse impacts on the integrity of Epping Forest Special Area of Conservation (SAC), as required under the Habitats Regulations. Epping Forest District Council (EFDC) is acting as the coordinating competent authority in relation to Epping Forest SAC as defined by the Habitat Regulations 2010 and as described in the Defra Guidance (2012).

4. Co-operation for Sustainable Development Board – Functional Economic Market Area (Appendix D)

This MOU considers the distribution of employment land between East Hertfordshire, Epping Forest, Harlow District and Uttlesford Council's in collaboration with

Essex and Hertfordshire County Council's. The purpose of this MoU is to ensure that the West Essex-East Hertfordshire Authorities (supported by Essex County Council and Hertfordshire County Council), work together to fulfil the following requirements: To plan for meeting in full, the employment needs of the Functional Economic Market Area (FEMA), as assessed by the West Essex and East Hertfordshire Assessment of Employment Needs Report (October 2017) and ensure the delivery of these /the following ? i.e.

- i) 51,000 jobs
- ii) 10-24 hectares of employment land for office requirements
- iii) 68 hectares of employment land for industrial requirements
- iv) To achieve (i) above through formalising agreement of the employment growth distribution which is set out within the "Assessment of Employment Needs" FEMA report (Hardisty Jones Associates Ltd (HJA) - October 2017) at sustainable locations in the FEMA.
- v) To shape and deliver the shared Strategic Vision for the London Stansted Cambridge Corridor (LSCC) 'Core Area' which will include a focus on strategic and transformational growth at Harlow, to be developed through the Harlow and Gilston Garden Town Economic Growth Strategy.
- vi) To continue to engage with one another in detail, and on a continuing basis through the plan-making process, with the intention of ensuring the preparation and delivery of sound local plans of each respective LPA, together with supporting economic growth strategies wherever necessary.
- vii) To continue to co-operate during the implementation and monitoring of individual local plans in order to ensure their effectiveness, including ensuring flexibility and the ability to adapt and respond to changing circumstances as they emerge.
- viii) To develop an improved shared understanding around the economic growth of the FEMA, and specific future requirements of the Harlow and Gilston Garden Town, including the commissioning, interpretation and effective application of any future joint evidence work where required.
- ix) To meet the requirements of the Duty to Cooperate effectively and demonstrably and in particular, to focus on its strategic, cross-boundary considerations and to provide a clear framework for collaborative partnership working.

5.5 The outcome of this MOU is the agreement of the distribution of job growth between East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils to be set out in their respective Local Plans. This is also fully in accordance with the spirit of the Duty to Co-operate, as set out in statute and Government guidance, in that it ensures that strategic priorities across local authority boundaries are properly coordinated, in this case the quantum and distribution of jobs between the authorities across the FEMA.

5.6 A number of other MoUs and Statements of Common Ground (SoCG) are currently being drafted with other organisations. These will be agreed prior to the Examination Hearing sessions. The organisations are listed below.

- Essex County Council - in respect of education and, highway and transport planning, public health, skills strategy; flood alleviation;
- Environment Agency - in respect of water quality

- Natural England - in respect of recreation and air quality affecting Epping Forest SAC and Hatfield Forest SSSI
- Thames Water – in respect of sewage matters
- Affinity Water
- Princess Alexandra Hospital – in respect of the development of the existing site
- Epping Forest District Council – in respect of the strategic housing site to the east Harlow that extends into Epping Forest District

6.0 Strategic Matters considered through the Duty to Cooperate

6.1 The MOU's and SoCG referred to above have been and will be developed through the consideration of a range of strategic planning matters through collaboration with adjoining local planning authorities and other organisations and bodies. These matters are described in more detail under the headings below.

Strategic Housing matters

6.2 Joint working on strategic planning issues in the East Herts/West Essex area has been taking place for a number of years. In 2008, under the then Regional Planning regime, the Council joined with Brentwood, Broxbourne, Epping Forest, East Hertfordshire, and Uttlesford Council's to form the London Commuter Belt East/M11 Sub Region partnership. The group commissioned consultants Opinion Research Services (ORS) to prepare a Strategic Housing Market Assessment (SHMA) ²in order to assess housing needs across sub regional area. This study was published in January 2010, and was subsequently updated in March 2013. In 2013 Harlow Council also commissioned separate work, the Harlow Future Prospects Study, which examined the relationship between regeneration and growth in Harlow and to assess the town's prospects under different levels of future development. This outlined the regeneration benefits that would accrue with growth and highlighted the need to work with adjoining authorities through the Duty to Co-operate to achieve the levels of growth required.

6.3 Following the enactment of the Localism Act 2011 and the publication of national Planning Practice Guidance (PPG) in March 2014, East Herts, Epping Forest, Harlow and Uttlesford Councils commissioned the same consultants to prepare a revised SHMA. This study, which was published in September 2015, confirms that the most appropriate functional housing market area comprises the administrative areas of the four authorities. It also recommended that Broxbourne Borough was better aligned with Welwyn Hatfield having regard to its location.

6.4 In terms of housing need, the 2015 SHMA concluded (based on 2012 Household projections) that the combined level of housing need across the four local authority areas is 46,058 homes for the period 2011 - 2033. This figure was disaggregated amongst the four authorities but for Harlow District Council the level of need was identified as being 268 new homes per year, or 5,900 by 2033. Subsequently (July 2017), the SHMA was updated to take into account the CLG 2012-based household projections. The conclusion of this update was that to meet need 337 new homes a year or 7,409 would be required in Harlow district by 2033. As set out above a Memorandum of Understanding (MoU) has been prepared which commits all four Councils to meeting their individual housing needs within their own administrative boundaries, including those associated with Gypsies

and Travellers and Travelling Showpeople. Gypsy and Traveller and Travelling Showpeople needs have been considered through an Essex wide study. A full explanation of housing need is provided within the Housing Topic Paper).

6.5 Separate joint work was also commissioned by East Hertfordshire, Epping Forest, Harlow and Uttlesford District Council's to consider strategic spatial options for the SHMA. The Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market was published in 2016 and identified the most sustainable spatial development choice for the HMA.

6.6 This concluded that Harlow represented the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town.

Strategic Economic Matters

6.7 East Hertfordshire, Epping Forest, Harlow District and Uttlesford Council's in collaboration with Essex and Hertfordshire County Councils also commissioned consultants to prepare joint economic evidence in order to inform the content of the SHMA. The purpose of this work was to identify the Functional Economic Market Area (FEMA) and to ensure that the assessment of housing need within the SHMA adequately addressed the requirement to match homes and jobs. The initial study, Economic Evidence to Support the Development of the OAHN for West Essex and East Herts (September 2015) was commissioned to help inform the calculation of the Objectively Assessed Housing Need (OAHN) for the SHMA. This considered historic job growth and projections of future jobs growth and how this should be distributed across the SHMA area and concluded that, for Harlow District Council, between 325 and 335 new jobs will be created each year. The result of this work has been reflected both within the SHMA and the Harlow Local Development Plan.

6.8 A further study the West Essex and East Hertfordshire Assessment of Employment Needs (October 2017) was undertaken in order to gain an up to date understanding of employment needs across the wider area, and how those needs should be disaggregated amongst the respective local authorities. This concluded that Harlow would need to provide between 2 and 4 ha of office floorspace and 16 ha of industrial floorspace. The outputs of this work was agreed through the joint MoU outlined above, signed by the four Housing Market Area authorities and has been set out in the Harlow Local Development Plan. Further work is ongoing to determine the distribution of the small residual amount of employment floorspace of 3-4 ha that that needs to be accommodated within the FEMA area. A full explanation of employment needs is provided within the Employment Topic Paper (TPA/).

Strategic Transportation Matters

6.9 The consideration of transport issues associated with the growth required across Harlow and the wider area has been a key aspect of ongoing joint working through the Co-operation for Sustainable Development Board. In order to assess the potential impacts transport modelling, known as VISUM,

has been led by Essex County Council to consider the impacts of planned growth arising from the respective local plans of the four core authorities (East Herts, Harlow, Uttlesford and Epping Forest).

6.10 To date, the modelling has demonstrated a need to deliver a range of strategic highways measures in order to provide for 14,000 – 16,000 new homes across the wider Harlow area within the Plan period. As well as considering the growth being brought forward in Harlow district it also has regard to the housing development being proposed on the edge of the town within the administrative areas of East Hertfordshire and Epping Forest District Councils. A number of Technical Notes have been prepared by ECC that sets out the outputs of this modelling work and other Transport related matters. Arising from this work a range of mitigation measures including improvements to the transport network have been identified.

6.11 As set out above a Transport Memorandum of Understanding has been signed by East Herts, Harlow, Epping Forest and Uttlesford District Councils, Hertfordshire and Essex County Councils and Highways England. The MoU identifies the required mitigation measures and commits the signatories to working together to deliver the schemes during the Plan period. It should be noted that some of the 'future actions' identified within the MoU have now been completed, particularly those that relate to the provision of Junction 7A on the M11. The MoU will be updated periodically to reflect further work undertaken including the outcomes of the Sustainable Transport Corridor Study that considers what additional improvements are needed to the transport network so that the Garden Communities that are being brought forward around Harlow, are integrated with the town in a sustainable manner. Additional transport modelling is being undertaken as work on the respective local plans being produced in the area has progressed.

Assessment of Strategic Sites around Harlow

6.12 The Harlow Strategic Sites Assessment (September 2016) was a study jointly commissioned by East Herts, Epping Forest and Harlow Councils in order to assess the potential suitability of sites on the edge of Harlow to deliver the housing need identified in the joint SHMA. The study was undertaken in recognition that Harlow is already a major urban area within the London Stansted Cambridge Corridor, providing homes and jobs (including two EZ's), health and education facilities, as well as a significant retail offer serving the wider area. It also has good connectivity to the West Essex mainline and the M11 as well as being close to Stansted Airport. Parts of the District are, however, in need of regeneration. Consequently it was considered that Harlow provides a sustainable opportunity to focus a significant proportion of the housing needs identified within the housing market area, and sufficient suitable sites were identified to accommodate 9,200 new homes over the Local Plan period, which is the housing figure set out in the Local Plan.

6.13 Based on the results of ongoing VISUM transport modelling work, the study concluded that between 14,000 and 16,000 homes (including 9,200 homes in Harlow) could be delivered within the wider Harlow area by 2033 subject to the successful delivery of the highways mitigation measures identified within the Memorandum of Understanding on Highways & Transportation Infrastructure. It also indicated that further development is likely to be deliverable in the area following the identification of additional mitigation measures through transport modelling.

Strategic Air Quality and Recreation Matters relating to Epping Forest SAC (a European Site)

6.14 Of particular importance within the housing market area, is the potential impact of growth on the Epping Forest Special Area of Conservation (SAC) which lies beyond the administrative boundaries of Harlow district. Following iterative discussions over a long period, a Memorandum of Understanding has been agreed by East Herts, Epping Forest, Harlow and Uttlesford District Councils, as well as Hertfordshire and Essex County Councils, Natural England and the Corporation of London. The MoU requires the authorities to monitor any impact on the environmental quality of the Forest, and to introduce mitigation measures where these are necessary. Arising from this the signatories, in conjunction with the relevant London Borough's, have been working together to develop an appropriate mitigation strategy that will be agreeable to all parties, and in particular to address outstanding matters raised by Natural England.

7.0 Other organisations and bodies engaged through the Duty to Cooperate

7.1 The Council has, therefore, worked collaboratively with a number of Local Authorities, organisations and bodies across a range of planning matters to ensure that these have been considered in the preparation of the Local Plan. These are described in more detail below.

London Stansted Cambridge Consortium (LSCC)

7.2 The London Stansted Cambridge Corridor Consortium is a partnership of public and private organisations covering the area north of Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10, and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge. The partnership was formed to organise and promote what is a clear economic area, with strong inter-connections, commuting to work and learn patterns, clusters of industries and supply chains. The consortium's focus is to promote the economic development of the area, unlocking the potential of this successful but under developed area, without compromising the existing quality of life.

7.3 The Councils of Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford form the LSCC Core Area. This corridor has, over the past decade or more, been the engine of UK growth with its world class industries and businesses. In order to support the aims of the LSCC, the outcome of this joint working was the agreement of the four core Members of the Co-op Board to include the LSCC's Strategic Vision within their respective Local Plans, including the Harlow Local Development Plan. This ensures that a co-ordinated planning framework is in place to secure economic growth, linked to housing and infrastructure provision, to support the objectives of the LSCC.

Essex County Council (ECC)

7.4 The Council has engaged with Essex County Council on a number of issues in relation to the Local Development Plan including site specific transport issues as well as education and minerals and waste. Issues arising from these topic areas have been addressed through the Infrastructure Delivery Plan and reflected in the policy approach set out in the Local Plan.

7.5 In accordance with the Duty to Co-operate the Council, together with ECC, have been working with other local planning authorities in the area to demonstrate how strategic cross boundary issues have been considered. This includes transport modelling which has been led by Essex County Council, who used VISUM modelling to undertake assessments across the Harlow area. ECC have

also worked closely with HCC to ensure a consistent approach when undertaking modelling across the county boundaries.

7.6 The outcomes of the model runs undertaken have informed the content of the representations made by Essex County Council on the Local Development Plan for Harlow in respect of potential impact on the district. In addition ongoing joint working has resulted in the identification of a package of transport measures to support the growth identified in the Local Plan including a second Stort Crossing, the identification of Sustainable Transport Corridors and improvements to the existing highway network. ECC has supported the approach taken by Harlow, and indeed the adjoining districts, to identify sustainable locations for growth is, in transport terms, acceptable and, therefore, 'sound'.

7.7 In addition to transportation matters the Council has also worked collaboratively with ECC to ensure that education needs have been considered and reflected in the policies and proposals set out in the Local Plan. This has been also been reflected in the contribution that ECC made to the preparation of the Infrastructure Delivery Plan.

7.8 The Council has also worked with ECC to ensure that waste and mineral matters are acknowledged in the Local Plan. ECC is responsible for minerals and waste planning in Essex and the Local Plan acknowledges that the Minerals Local Plan and Waste Local Plan comprise part of the suite of Development Plan Documents for Harlow. This has included references to the appropriate policies in those Plans that relate to Harlow.

East Hertfordshire District Council (EHDC)

7.9 The Council has also been working collaboratively with East Hertfordshire District Council to consider mutual strategic planning matters through a continuous process since the East of England Plan and more recently through the Duty to Co-operate arising from the requirements of the Localism Act 2011. This has culminated in the preparation of a number of joint studies and signed MOU's in respect of housing, employment and infrastructure needs for Harlow and the wider area described above. Whilst the East Hertfordshire District Plan was submitted for Examination in 2016 East Hertfordshire and Harlow Council, together with Essex and Hertfordshire County Councils, have collaborated in the development of a joint masterplanning and policy approach, to ensure consistency in the consideration of strategic matters in their development plans.

7.10 This has continued through the workstreams being brought forward through the Garden Town Board including the joint Spatial Vision, Design Charter, Transport Study, the Sustainable Corridor Study and overarching Viability Study. The examination held to consider the East Hertfordshire District Plan has concluded and following receipt of the Inspector's Final Report it is anticipated that the Plan will be adopted in September 2018. This confirms that the housing strategy set out in the jointly agreed SHMA has been considered sound across the wider area.

Epping Forest District Council (EFDC)

7.11 The Council has been working collaboratively with Epping Forest District Council to consider mutual strategic planning matters through a continuous process since the East of England Plan and more recently through the Duty to Co-operate arising from the requirements of the Localism Act 2011. This has culminated in the preparation of a number of joint studies in respect of housing, employment and infrastructure needs for Harlow and the wider area and the development of a joint

masterplanning and policy approach for a large strategic housing site to the east of Harlow that extends into Epping Forest District. Epping Forest District Council also indicated that it would be unable to meet its identified housing needs, and as such, formally asked Harlow Council and other neighbouring authorities for assistance. Harlow Council responded by confirming that, due to the challenging level of housing need in Harlow including the Districts tight administrative boundaries, it would not be able to provide any additional housing, beyond that identified in the Harlow Local Development Plan, to meet Epping Forest District Councils housing residual needs.

Uttlesford District Council (UDC)

7.12 Whilst further to the north east of Harlow the Council has also worked closely with Uttlesford District Council in the preparation of a number of joint studies in respect of housing, transport and employment needs for Harlow and the wider area culminating in the joint endorsement of the MOU's described above. While both Harlow and Uttlesford Councils are fully engaged with the Co-op Board, the two districts do not share mutual boundaries. This means that it would be both impractical and indeed unsustainable to consider distributing housing provision related to Harlow at locations in Uttlesford remote from employment opportunities and other key facilities. In any event Harlow's specific housing need, as set out in the SHMA, can be accommodated within the district boundary.

Hertfordshire County Council (HCC)

7.13 In conjunction with East Hertfordshire, Epping Forest, and Uttlesford District and Essex County Council, Harlow has worked with Hertfordshire County Council to cross-border strategic issues, particularly in respect of transport matters. This has culminated in HCC submitting a bid on behalf of these council's to the Government Housing Infrastructure Fund to secure forward funding for the second Stort crossing and to assist in the delivery of the north-south Sustainable Transport Corridor.

Princess Alexandra Hospital (PAH)

7.14 The Co-op Board and Harlow Council have engaged with senior representatives from the Princess Alexandra Hospital in Harlow in respect of their future needs. The hospital, which is located on a highly constrained site near the town centre, faces a number of challenges in terms of ensuring that the buildings remain fit for purpose over the coming years.

7.15 The Hospital Trust is considering re-locating to a new site on the edge of Harlow and has commissioned consultants to assess the suitability of sites on the periphery of the town, subject to the necessary funding being available from Government to finance a the construction of new hospital. The Garden Town Board will continue to work jointly with the Trust on these matters to secure a satisfactory outcome that ensures the hospital remains in Harlow or near to Harlow.

NHS England and Clinical Commissioning Groups (CCGs)

7.16 The Council has engaged with the relevant health bodies for Harlow throughout the Plan making process, to ensure, where appropriate, health and related issues have been taken into consideration. This has meant working with West Essex Clinical Commission Group and Essex County Council, through workshops and meetings in the preparation of Harlow's Infrastructure Delivery Plan (IDP) to ensure health and related matters have need taken into consideration in the

preparation of the Local Plan. This has resulted in the identification of contributions needed to enhance health care provision in Harlow to support the proposed growth.

Broxbourne Council

7.17 Although not part of the SHMA the Council has engaged with Broxbourne Council in the preparation of their Local Plan. In respect of their identified housing need Harlow Council had been asked to accommodate some of their unmet need. Harlow was not able to accede to this request owing to the districts tight administrative boundaries and other physical and environmental constraints.

7.18 The National Planning Policy Framework identifies a number of other bodies that the Council should engage with through the Duty to Co-operate. These are identified below. Further discussions with these organisations will take place as necessary, both prior to the Local Plan Examination and subsequently through more detailed design work for specific sites.

Environment Agency (EA)

7.19 The Council has been working with the Environment Agency (EA) throughout the preparation of the Local Plan to ensure relevant issues have been considered in policies and the development of spatial options. This has informed the development of the policies in the Local Plan. In addition a Water Cycle Study has been commissioned to assess sites within Harlow District, and those within East Hertfordshire District Council (EHDC) and Epping Forest District Council (EFDC) which will form the proposed Harlow-Gilston Garden Town. This involves the participation of the following strategic partners: East Hertfordshire District Council, Epping Forest District Council, Harlow District Council, Uttlesford District Council, Essex County Council, Hertfordshire County Council, Thames Water, Affinity Water, and the Environment Agency.

7.20 This study will be complete before the examination commences and considers matters relating to the impact of future development within Harlow District and Harlow-Gilston Garden Town study area, including the impacts on water supply, wastewater collection and waste water treatment. Ongoing discussions between the statutory providers indicate that there are unlikely to be any significant barriers to the delivery of the growth set out in the Local Plan.

Historic England (HE)

7.21 Throughout the various stages of the preparation of the Local Plan the Council has collaborated and consulted with Historic England (previously English Heritage) to ensure the policies and proposals of the Plan have due regard to heritage matters. This is part of an iterative process that will continue during the Plans implementation. In response to some issues that were raised to the Pre-Submission consultation these form the basis of ongoing discussions and will be addressed through an MoU in due course.

Natural England (NE)

7.22 Natural England has been actively engaged in the development of the Local Plan and has been supportive of the proposals contained in the Plan, with outstanding matters being considered through the joint MoU outlined above. This has been signed by East Hertfordshire, Epping Forest,

Harlow and Uttlesford District Councils, Essex and Hertfordshire County Councils, the City of London and Natural England.

7.23 In this respect Natural England has been fully engaged with regards to the preparation of the MoU concerning air quality and potential impacts on Epping Forest SAC, including the preparation of an appropriate mitigation strategy by the commissioning bodies as well as the consideration of a Habitats Regulation Assessment which has been prepared in support of the Plan. In addition the policies and proposals in the Local Plan have been shaped by the comments made by NE throughout the consultations, including potential further minor changes that will be set out in the Schedule of minor modifications to be submitted with the Local Plan, if the Inspector is minded to accept.

Highways England (HE)

7.24 In order to ensure a co-ordinated approach to strategic highway matters the Council, together with Essex County Council, have worked closely with Highways England to ensure that the growth in and around Harlow can be accommodated on the highway network. This has culminated in Highways England being a co-signatory on the MOU in respect of highways and transportation infrastructure in the West Essex/East Hertfordshire Housing Market Area (described above).

7.25 In this regard the three highway authorities are committed to co-operating with the planning authorities for the West Essex/East Hertfordshire HMA to enable sustainable communities by providing a better understanding of key highways infrastructure, including public transport and sustainable modes, that will be required to support those developments.

7.26 They acknowledge their responsibility to support and develop a more coordinated approach to planning on the strategic and local highway networks to provide sustainable communities and are fully committed to jointly working together to resolve key highway and transportation issues, primarily those outlined in section 4 of the MoU, but also any further issues which come to light in the future.

7.27 A key outcome of this joint working has been support for the new junction 7a on the M11 that will help unlock growth across the wider Harlow area, for which planning permission has been granted, with enabling work now well underway.

Homes England (Formerly the Homes and Communities Agency (HCA))

7.28 Through the Duty to Cooperate the HCA Advisory Team for Large Applications (ATLAS) has provided support to Harlow Council, together with the adjoining LPA's, to assist with spatial plan making across the area. In particular, ATLAS has provided impartial advice from the earliest stages of plan making with regards to developing a framework to consider the most appropriate spatial development options in Harlow and the wider area, based upon the growth identified in the emerging SHMA's. This enabled mutual agreement to be reached between the East Hertfordshire, Epping Forest, Harlow and Uttlesford Councils in relation to the identification of strategic development sites around Harlow. This culminated in the provision of significant technical support in relation to the successful Harlow and Gilston Garden Town expression of interest including attendance at subsequent meetings of the Board and with officers. Homes England continues to provide support and advice in relation to the successful delivery of the Garden Town.

Transport for London (TfL)

7.29 The Council has actively engaged with both TfL and Network Rail in order to examine the opportunity to extend the proposed Crossrail 2 scheme beyond Broxbourne to Harlow. This would provide a key transport hub to support the other transport strategies and measures that are being put in place to deliver the Harlow and Gilston Garden Town.

Greater London Authority

7.30 Whilst not adjoining London the Council has been engaged through the Co-operation for Sustainable Development Board with the GLA in respect of the preparation of the London Plan and commented on appropriate matters in particular in relation to housing and transport. Whilst generally supportive of the Plan the Council wished that the economic importance of Harlow in the LSCC should be more fully recognised including the advantages of extending Crossrail 2 to Harlow, and that in order to increase housing supply a more open discussion should take place on the role of the Green Belt to ensure existing urban areas are not degraded by over intensive increases in housing density. In addition clearer guidance needs to be considered about the role of authorities outside of London in supporting delivery.

Enterprise Zone Board (EZB)

7.31 The Council is a member of the EZB and has regularly liaised with East Hertfordshire District Council, Epping Forest District Council, Essex and Hertfordshire County Council's to ensure the economic objectives and roles of the Enterprise Zones in Harlow are acknowledged in emerging Local Plans in the area.. The Board also includes representatives from the private sector who have interests in sites within the designated EZ's including Pearson's, Raytheon and Arrow.

Harlow & District Chamber of Commerce

7.32 Over the years the Council has been an active member of the committee of the local chamber of commerce. This includes businesses from key sectors across the town who have been provided with updates on the emerging Local Plan and the Harlow Town Centre Area Action Plan.

M11 Health Enterprise Forum

7.33 In partnership with the Life Science membership organisation One Nucleus, the Council has been working to bring together Life Sciences business and organisations in the M11 corridor to support sector innovation and growth. This underpins the objectives of the LSCC, referred to above, which have been reflected in the Local Plan.

Invest Essex

7.34 In order to support the delivery of the Enterprise Zone and to secure inward investment in Harlow the Council has worked closely with Invest Essex. This is a County wide initiative that aims to help companies identify suitable business locations and to grow. The initiative underpins the objectives of the Harlow Economic Development Strategy which is reflected in the policies and proposals contained in the Local Plan.

Major site promoters

7.35 In addition to the above bodies and organisations above the Council has been working with the developer of the only major strategic site being promoted in Harlow in the eastern part of the district. This is to ensure that the Council and the developer, Miller Homes, can work together to ensure the housing, and the necessary infrastructure provision, can be delivered in a timely manner. This site also extends into Epping Forest District. This means that Harlow Council, in conjunction with Epping Council and ECC, have been working together, including through participation in joint developer forums, to ensure a co-ordinated framework is in place to secure the delivery of the site. This has resulted in a joint strategic policy approach together with the preparation of a masterplanning framework and Planning Performance agreements (PPA's) to assist the Development Management process at the delivery and implementation stage.

8.0 Conclusion

8.1 The Harlow Local Development Plan has been prepared following extensive engagement with adjoining local planning authorities and relevant county councils and other specified bodies and organisations on strategic matters. Not only has this been entirely in accordance with the Duty to Cooperate but this has also secured positive outcomes with the relevant bodies and organisations to help underpin the vision and objectives of the new Local Plan to secure its delivery.

**Memorandum of Understanding on
Distribution of Objectively Assessed Housing
Need across the West Essex/East Hertfordshire
Housing Market Area**

March 2017

Between

East Hertfordshire District Council
Epping Forest District Council
Harlow District Council
Uttlesford District Council



Uttlesford
District Council

And supported by (non-signatories)

Essex County Council (as a Highways Authority)
Hertfordshire County Council (as a Highways Authority)
Highways England



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1 Background

Introduction

- 1.1. This Memorandum of Understanding (MoU) concerns the distribution of the Objectively Assessed Housing Need (OAHN) of four councils comprising the West Essex/East Hertfordshire Housing Market Area (HMA): East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council (see Appendix 1 for more background on the HMA).
- 1.2. The MoU was prepared by officers and Members of these four authorities, with assistance from Essex County Council, Hertfordshire County Council and Highways England. The preparation of the MoU was overseen by the 'Co-operation for Sustainable Development Member Board' (the Co-op Member Board)¹.

Joint and co-ordinated working in the West Essex/East Hertfordshire HMA

- 1.3. The National Planning Policy Framework (NPPF) states that: "Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities..." and, furthermore, "The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities" (para 178). It also expects local authorities "...to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for Independent Examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development" (para 181).
- 1.4. East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils (also referred to in this MoU as the "West Essex/East Hertfordshire Authorities") have a substantial history of co-ordinated working on strategic planning issues, not least on assessing housing need and planning for future growth. Essex County Council and Hertfordshire County Council have also been involved in cross-boundary working with the authorities for many years on many different topics including planning matters.
- 1.5. Each of the West Essex/East Hertfordshire Authorities will publish their Local Plans (East Hertfordshire for Regulation 19 publication and Epping Forest District for Regulation 18 consultation by the end of 2016, with Harlow for Regulation 19 publication and Uttlesford District Council for Regulation 18 consultation in 2017). The Local Plans will then progress into Independent Examination and adoption in 2017/2018. Joint and co-ordinated working will continue on relevant matters.

¹ The 'Co-operation for Sustainable Development Member Board', established October 2014, hereafter referred to as the 'Co-op. Member Board'. See Appendix 2 for further details of this and the related 'Co-operation for Sustainable Development Officer Group' (hereafter referred to as the 'Co-op Officer Group').

Housing need

1.6. Three Strategic Housing Market Assessments (SHMAs), published in 2010, 2012 and 2015 have been undertaken for the combined area of East Hertfordshire, Epping Forest, Harlow and Uttlesford Districts². The most recent SHMA was commissioned by the Co-op Member Board and managed through a sub group of the Co-op Officer Group. Details of the terms of reference and working practices of the Co-op Member Board and the Co-op Officer Group are set out in Appendix 2. The 2015 SHMA gives an up to date and Planning Practice Guidance compliant³ assessment of housing need over the Housing Market Area (HMA) for the period 2011-2033. The 2015 SHMA gave the following headline results (in net additional dwellings) for the HMA as a whole, and for each local authority. It is acknowledged that since the publication of the SHMA in 2015, updated 2014-based household projections have been published (see paragraph 3.4). The four authorities are all committed to identifying an up-to-date OAHN based on the 2014-based projections. The 2015 SHMA gave the following headline results (in net additional dwellings) for the HMA as a whole, and for each local authority.

Figure 1 - Headline results from the SHMA (2015)

Local Authority	OAHN Market dwellings	OAHN Affordable dwellings	Total OAHN (net new dwellings 2011-2033)
East Hertfordshire DC	12,200	4,200	16,400
Epping Forest DC	8,100	3,200	11,300
Harlow DC	2,500	3,400	5,900
Uttlesford DC	9,700	2,800	12,500
Total for HMA	32,500	13,600	46,100

NB – totals may not sum due to rounding

The full 2015 Joint SHMA is available to view at:

<http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/458-strategic-housing-market-area>

Economic growth

1.7. The Co-op Member Board also commissioned a Joint Economic Report, to consider the Objectively Assessed Economic Need (OAEN) of the Functional Economic Market Area (FEMA, which has been found to be the same as the HMA). This was published in 2015 and gives an up to date and Planning Practice Guidance⁴-compliant assessment of employment

² The SHMAs published in 2010 and 2012 also included Broxbourne Borough Council and Brentwood Borough Council; both of these authorities declined to take part in the most recent SHMA, as Broxbourne BC decided to pursue its own SHMA and Brentwood BC had become part of a wider 'Heart of Essex' SHMA. However, both authorities adopted a 'watching brief' on the 2015 SHMA and through the Co-op Officer Group and Co-op Member Board, were involved in discussions about the SHMA brief and findings.

³ Planning Practice Guidance, Paragraph: 001 Reference ID: 2a-001-20140306

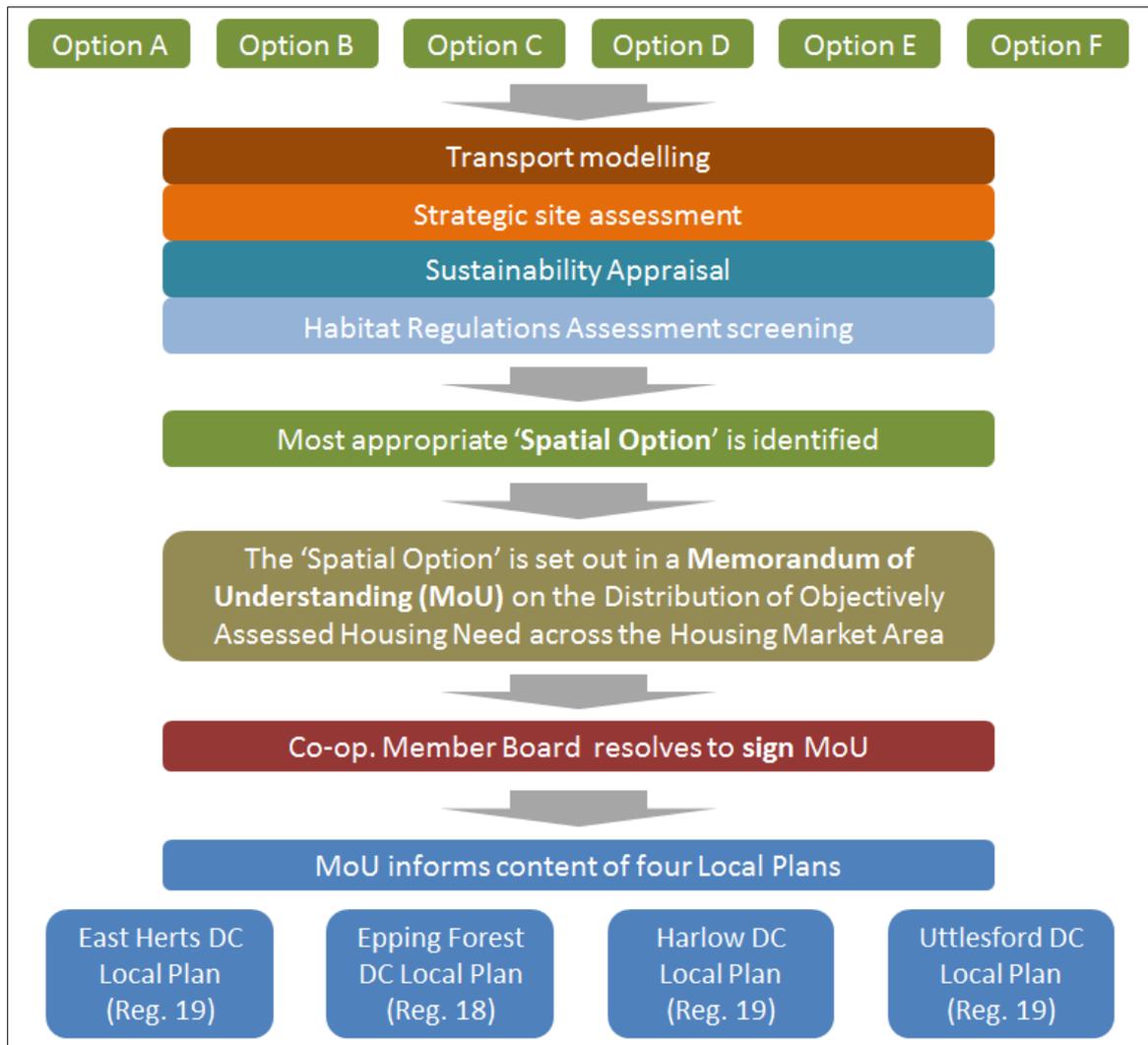
⁴ Planning Practice Guidance, Paragraph: 030 Reference ID: 2a-030-20140306

need across the FEMA for the period 2011-2033. (More details of the 2015 Joint Economic Report can be found in Appendix 3).

Spatial distribution of housing

- 1.8. In order to comply with the Duty to Co-operate in section 33A of the Planning and Compulsory Purchase Act 2004, the West Essex/East Hertfordshire Authorities commissioned work from consultants AECOM, through the Co-op Member Board, to assess the sustainability of strategic spatial options for meeting the overall OAHN within the HMA. The results of this 'spatial optioneering' work inform this MoU.
- 1.9. The work undertaken by the Co-op. Member Board to develop and test options for distributing different levels of growth across the HMA will form a critical component of the evidence base informing each of the four local plans. This work clearly demonstrates that the questions of (i) how much housing should be delivered across the HMA; and (ii) where should this housing best go have both been robustly addressed. Specifically, the authorities have agreed an overall quantum of development for the HMA as well as a housing figure for each of the four authority areas and a specific figure for the level of development to be accommodated in and around Harlow town (to be met in part through named strategic sites). Beyond these agreed figures the four authorities will determine the spatial distribution of housing in their respective areas through their own local plan processes.
- 1.10. The Spatial Options Study used four means to test six potential distribution Options (Options A - F), and the Co-op Member Board subsequently resolved on a specific 'Spatial Option', as set out in Figure 2.

Figure 2 – Process for the Strategic OAHN Spatial Options Study



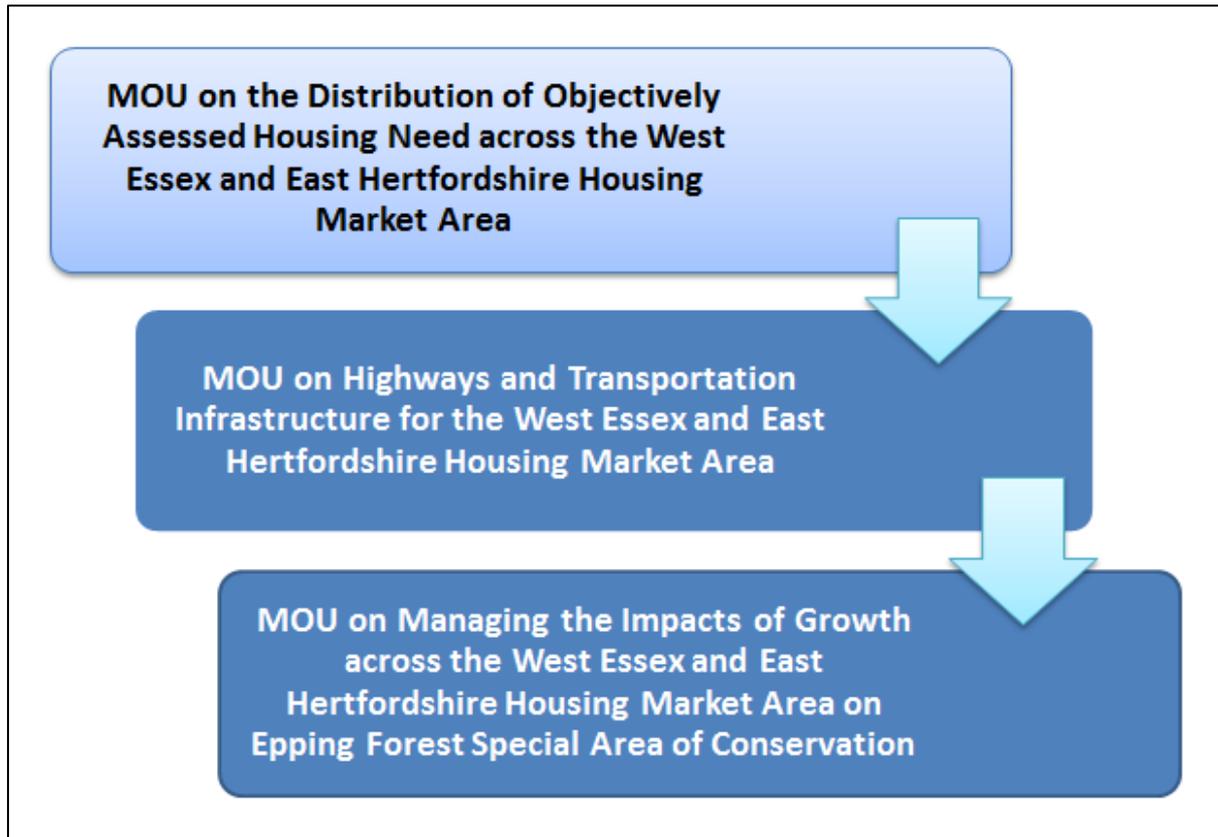
1.11. Further details of the Spatial Options Study are included within Appendix 4.

2 Purpose of this Memorandum of Understanding (MoU)

The three inter-related Memoranda of Understanding

- 2.1. This MoU is the overarching one of a group of three related memoranda of understanding.
- 2.2. The other two deal with highways and transportation infrastructure, and Epping Forest Special Area of Conservation respectively, as shown in Figure 3.

Figure 3 – Inter-related Memoranda of Understanding



This Memorandum of Understanding

- 2.3. This MoU is designed to address the distribution of OAHN as defined by the 2015 SHMA. Although it addresses the OAHN within the West Essex/East Hertfordshire HMA only, the draft of the MoU, and the evidence underpinning it, were discussed both at the Co-op Member Board and the Co-op Officer Group which includes other relevant authorities (see Appendix 2 for membership details).
- 2.4. The purpose of this MoU is to ensure that the West Essex/East Hertfordshire Authorities (supported by Essex County Council, Hertfordshire County Council and Highways England), working together, fulfil the following requirements:
 - (i) to meet in full, the Objectively Assessed Housing Need of the West Essex/East Hertfordshire HMA, as assessed by the Joint SHMA (2015), within the HMA (taking account of availability, viability and deliverability);
 - (ii) to deliver the shared Strategic Vision for the LSCC 'Core Area', as set out in Appendix 5 and to include this Strategic Vision as part of the individual local plans;

- (iii) to fulfil the commitment in the Joint Statement⁵ made by the Co-op Member Board in 2015, to "...work towards the production of a memorandum of understanding to support the joint working and meeting the duty to co-operate";
- (iv) to achieve item (i) above through the most sustainable pattern of development which is feasible, achievable and deliverable as assessed by the Spatial Options Study and other relevant evidence, by including the 'Spatial Option' for OAHN within individual Local Plans;
- (v) to continue to engage with one another at an early stage, in detail, and on a continuing basis, with the intention of avoiding possible objections being made at consultation stages and/or at Independent Examination of the individual Local Plans;
- (vi) to continue to co-operate during the implementation and monitoring of individual Local Plans;
- (vii) to commission any future joint evidence work which may be required;
- (viii) to help demonstrate compliance with the Duty to Co-operate during the Independent Examination of Authorities' Local Plans;
- (ix) to assist in securing necessary enabling strategic infrastructure for the growth set out in this MoU; and
- (x) to inform and support the 'Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area' MoU and the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation' MoU (see Figure 3).

Other matters considered outside this MoU

- 2.5. The NPPF states that, '*Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans*' (para 179).
- 2.6. There are of course many key issues, other than the spatial distribution of OAHN, which are cross-boundary in nature and which the West Essex/East Hertfordshire Authorities are working on together. Other key matters of strategic cross boundary significance which are being addressed by ongoing joint and co-ordinated work are listed in Figure 4. This is not an exhaustive list, and the four local authorities will continue to work together to identify and tackle cross-boundary matters. Essex County Council is preparing a Growth Infrastructure Framework, which will greatly assist in this task.

⁵ The Co-op Member Board issued a joint statement on sign-off of the 2015 Joint SHMA and 2015 Joint Economic Report, which is available here: <http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/532-shma-economic-growth-reports-co-op-board-joint-statement>.

Figure 4 – Key matters of strategic cross-boundary significance (outside this MoU)

<p>Other Housing issues</p> <ul style="list-style-type: none"> • Viability • Sustainable building materials and processes • Unmet needs and five year housing land supply • <i>Accommodation for Travellers and Travelling Showpeople (see below)</i>
<p>Other Economic issues</p> <ul style="list-style-type: none"> • Existing retail offer and future need • Competition between economic centres • Commuting patterns
<p>Highways & Transportation Infrastructure</p> <ul style="list-style-type: none"> • Delivery of the new J7A of the M11 to enable growth in and around Harlow • Promotion of sustainable modes of transport • Improvements at J7 and J8 of the M11 • London Stansted Airport growth • Opportunities relating to Crossrail 2 and four-tracking of the West Anglia Main line • Provision of Green Transport Corridors • Central Line issues
<p>Community Infrastructure</p> <ul style="list-style-type: none"> • Education - primary, secondary, higher • Open spaces, and sport and recreation facilities • Library provision
<p>Health</p> <ul style="list-style-type: none"> • Consideration of a new site for Princess Alexandra Hospital, possibly a 'health and social care campus' • Provision of primary care, adult social care etc.
<p>Environment</p> <ul style="list-style-type: none"> • Epping Forest Special Area of Conservation (inc. air quality) • Green Infrastructure • Climate change including flood risk • Food production, including the Lea Valley glasshouse industry • Wastewater management • Waste management • Integration of local designations • Urban form of growth areas and their integration with existing urban settlements
<p>Built Environment</p> <ul style="list-style-type: none"> • Significant heritage assets e.g. Historic towns and Conservation areas • Green Belt Reviews

2.7. These strategic cross-boundary issues will also be cascaded down to the individual Local Plans of the West Essex/Est Hertfordshire authorities.

Accommodation for Travellers and Travelling Showpeople

2.8. Assessing need and providing accommodation for Gypsies and Travellers and Travelling Showpeople is a key cross-boundary issue and one which will require ongoing and detailed engagement over the West Essex/East Hertfordshire area and beyond.

2.9. At the time of writing this MoU, an update to the Gypsy and Traveller Accommodation Assessment (GTAA) for Essex is being prepared. The update will re-assess need across Essex on the basis of the new definition (in planning terms) of travellers which was

introduced in 2015⁶, and which effectively redefined 'traveller' in planning policy terms to exclude those who no longer travel permanently. The update to the GTAA will also address need for Travelling Showpeople. The East Hertfordshire Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Update, May 2016⁷, has assessed need on the basis of the new national definition and taken into account the provisions of the Housing and Planning Act, 2016.

- 2.10. Harlow, Uttlesford and Epping Forest Districts have agreed to meet their own individual assessed need within their own boundaries. While East Hertfordshire District Council envisages being able to accommodate its need within its boundaries, it should be noted that it is entering into Duty to Co-operate arrangements with Welwyn Hatfield Borough Council to enable meeting some of both councils' identified needs via provision of a new site at Birchall Garden Suburb, East of Welwyn Garden City.
- 2.11. Those traveller households which have been identified as not meeting the new Planning Policy for Traveller Sites definition will have their accommodation needs provided for under other policies in the respective local plans.

⁶ Planning policy for traveller sites, CLG, August 2015, available at <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

⁷ This report is available at <http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2862>

3 The ‘Spatial Option’ of OAHN within the HMA

- 3.1. The AECOM report (Harlow Strategic Site Assessment, September 2016) identified sufficient suitable sites in and around Harlow to accommodate close to 16,100 units provided that:
- Detailed traffic modelling demonstrates that development to the East of Harlow is deliverable on the scale envisaged
 - Significant infrastructure requirements are met, including highways, sustainable travel options, education sewerage/drainage etc.
 - Landscape impacts can be mitigated
 - Development can be distributed amongst several sites in combination
- 3.2. The Spatial Options Study identified the most suitable option capable of accommodating approximately 16,100 units in and around Harlow, based upon the evidence assessed by AECOM.
- 3.3. The most suitable ‘Spatial Option’ represents ‘planning positively for growth’, as it is higher than both the established OAHN within the published 2015 SHMA (46,100), and the number suggested by the 2012-based CLG household projections alone (49,638 dwellings).
- 3.4. It is lower than the SHMA consultants ORS’ estimated figure for emerging OAHN taking into account the 2014-based Sub-National Population Projections, and the 2012-based Household Projections (approximately 54,600⁸), and lower than Option F (57,141) but it still makes good progress towards these higher figures. The proposed option takes account of the infrastructure constraints and specifically the capacity on the highway network.

Figure 5 – The ‘Spatial Option’ of OAHN - 2011-2033

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	~ 18,000
Epping Forest District Council	~ 11,400
Harlow District Council	~ 9,200
Uttlesford District Council	~ 12,500
Total across the HMA	~ 51,100
<i>...of which the area in and around Harlow* will provide</i>	<i>~ 16,100</i>

* This represents net new dwellings

** ‘In and around Harlow’ refers to Harlow town as well as around Harlow in adjoining districts

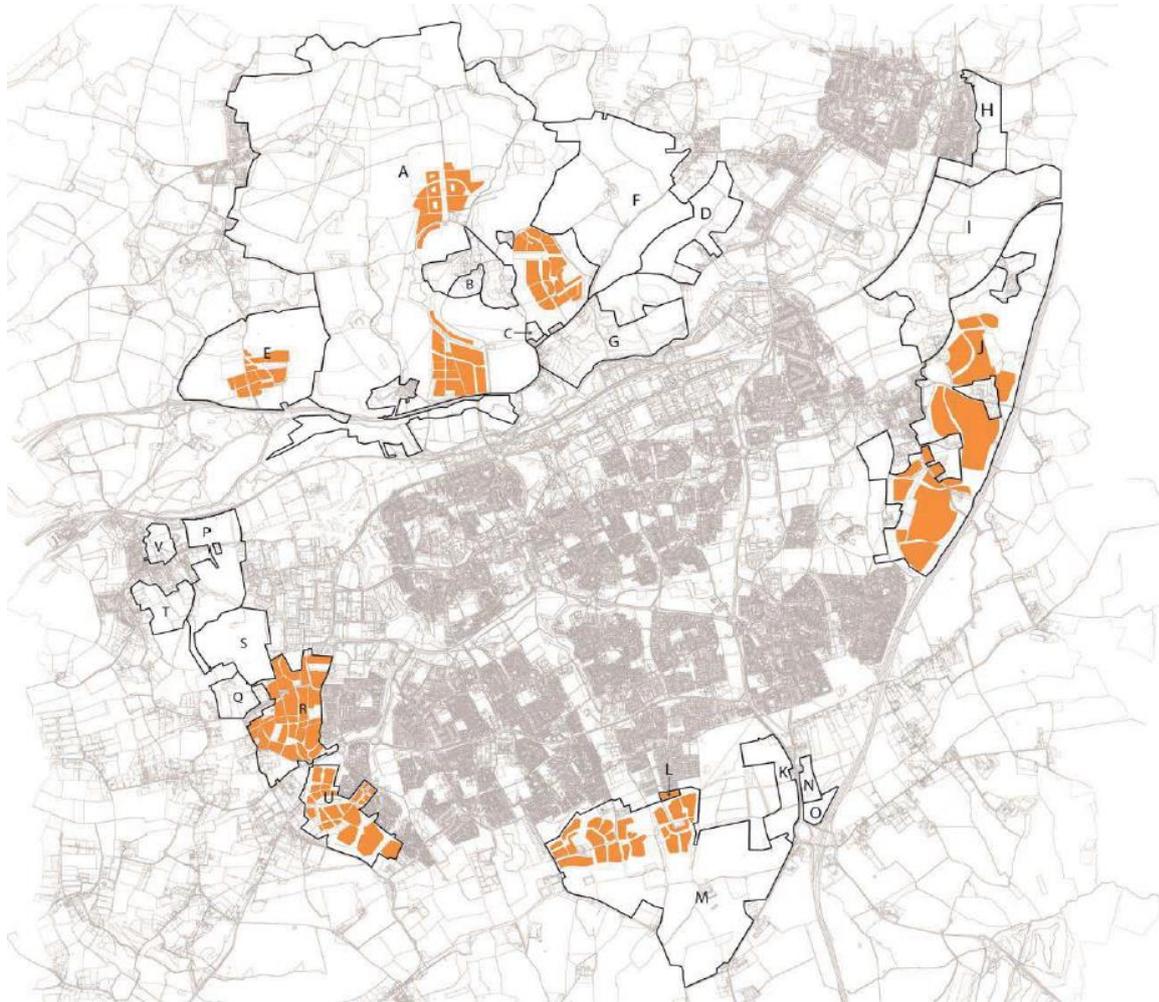
***Uttlesford District Council accept this figure as appropriate based on 2012 based housing projections. However, the Council is testing a figure of 14,100 based on 2014 projections to

⁸ SHMA consultants ORS have estimated that the impact of the 2014-based Sub-National Population Projections, and 2012-based Household Projections could mean a rise in OAHN to approximately 54,600, but this number is not final. It has been tested through the Spatial Options Study in the interests of assessing what that number might mean for the HMA. Formal review of the OAHN number will take place through a full SHMA update in the future.

meet the housing need from within the District. The Council reserves its position to potentially meet this housing need figure.

- 3.5. Approximately 16,100 dwellings identified in and around Harlow could be accommodated in the following AECOM distribution scenario subject to availability, viability and deliverability:

Figure 6 - AECOM scenario for how growth could be distributed



- 3.6. Development in and around Harlow will also include, within Harlow District, existing commitments (including completions and permissions), urban brownfield developments and development of the existing site of Princess Alexandra Hospital (which will relocate), which are not shown in Figure 6. This comprises approximately 6,575 dwellings, which are within the overall number for Harlow District Council quoted in Figure 5.
- 3.7. Delivery of this 'Spatial Option' will be informed and managed through the four West Essex/East Hertfordshire Authorities' individual housing trajectories, which the authorities will continue to co-operate on.
- 3.8. For more details of the 'Spatial Option' please refer to Appendix 4, and the Spatial Options Study.

4 Future co-operation & monitoring

- 4.1. This section sets out basic tasks and outcomes at present; more specific actions will be jointly agreed at a later date as this MoU is reviewed and kept up to date.

Implementation and Monitoring of the tasks outlined in this MoU

- 4.2. Overall compliance with the MoU will be monitored via a standing item on the agenda of the Co-op Officer Board. If any issues arise they will be referred to the next available Co-op Member Board for discussion and resolution. There will also be a formal review of compliance with the MoU on the Co-op Member Board agenda roughly every six months.

Figure 7 – Implementing and monitoring the tasks outlined by the MoU

Task		Implementation by	Monitoring by
1	Deliver the shared Strategic Vision for the LSCC 'Core Area' and include as part of the individual local plans	West Essex/East Hertfordshire Authorities to include the shared Strategic Vision within their Local Plans and seek to deliver it together.	Co-op Officer Group and Co-op Member Board, supported by LSCC to monitor delivery of the shared Strategic Vision.
2	Meet in full, the OAHN (including affordable housing need) of the West Essex/East Hertfordshire HMA through the most sustainable pattern of development, as assessed by the Joint 2015 SHMA and Joint Economic Report (2015) and updates, (taking account of availability, viability and deliverability)	West Essex/East Hertfordshire Authorities to include the 'Spatial Option' for OAHN (high level numbers and spatial principles) within their individual evidence base and Local Plans and continue to co-operate to find the best way of meeting the OAHN requirement in full in the HMA (see also para. 1.8)	Co-op Officer Group to monitor Local Plan consultations and ensure that the 'Spatial Option' for OAHN is included in individual plans, and that ongoing engagement takes place
3	Continue to engage with one another at an early stage, in detail, and on a continuing basis, with the intention of avoiding avoid possible objections being made at consultation stages and/or at Independent Examination of the individual Local Plans	West Essex/East Hertfordshire Authorities to continue to engage regularly via the Co-op Officer Group and Co-op Member Board which provide a platform for regular communication for all parties.	Co-op Officer Group to monitor overall engagement from the West Essex/East Hertfordshire Authorities, ensuring that information is shared at an early stage for all Local Plan consultations.

Task		Implementation by	Monitoring by
4	Continue to co-operate during the implementation and monitoring of individual Local Plans	West Essex/East Hertfordshire Authorities to discuss and work towards a common set of indicators for monitoring Local Plan progress, and use these together.	Co-op Officer Group to monitor progress to common set of indicators.
5	Commission any future joint evidence work which may be required	West Essex/East Hertfordshire Authorities to continue to share ideas about joint evidence which could be commissioned. Essex and Hertfordshire County Councils to assist with any suggestions.	West Essex/East Hertfordshire Authorities to self-monitor their engagement with each other on this task.
6	East Hertfordshire DC, Epping Forest DC and Harlow DC to continue to work together on the expression of interest for capacity funding to DCLG in response to the Locally Led Garden Villages, Towns & Cities Prospectus.	The three authorities with support from Uttlesford District Council, Essex County Council and Herts County Council to submit a joint bid for capacity funding with the help of ATLAS	West Essex/East Hertfordshire Authorities to self-monitor their engagement with each other on this task
7	Help demonstrate compliance with the Duty to Co-operate to the Planning Inspectorate	West Essex/East Hertfordshire Authorities to continue to engage regularly via the Co-op Officer Group and Co-op Member Board, and to refer to this MoU, and the two related MoUs, at the Independent Examination into their Local Plans.	West Essex/East Hertfordshire Authorities to self-monitor their engagement with each other on this task.
8	Assist in securing enabling strategic infrastructure for the growth set out in this MoU	If this MoU is not effective in helping secure enabling infrastructure, it will be reviewed and re-drafted.	Co-op Officer Group to monitor effectiveness, if found ineffective, a new draft will be mooted at the next available Co-op Member Board, and decisions on drafting to take place at the Board thereafter.

Task		Implementation by	Monitoring by
9	Inform and support the 'Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area MoU' and the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation MoU'	<i>This task is already complete; the 'Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area' MoU and the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation' MoU have been completed.</i>	

Contingency planning

- 4.3. Should the West Essex/East Hertfordshire Authorities encounter any significant difficulty in delivering the tasks outlined in this MoU, for example, if the 'Spatial Option' of OAHN were found in the future to be undeliverable for some unforeseen reason, the Authorities commit to working together to find a joint solution which represents the 'best option' for the HMA. This may include commissioning further technical evidence, preparing further MoUs or agreements etc. following discussions at the Co-op Officer Group and Co-op Member Board. Furthermore, mechanisms for Local Plan review may be considered by any of the Authorities.

5 Signatures

- 5.1 This Memorandum of Understanding is signed by and duly authorised for and on behalf of the following authorities. (See appendix 6 for details of roles and responsibilities of the organisations below in relation to this MoU):

East Hertfordshire District Council

Name (printed): Councillor Linda Haysey

Redaction

Signature:

Designation: Leader of the Council

Date: 31st March 2017

Epping Forest District Council

Name (printed): Councillor John Philip

Redaction

Signature

Designation: Planning Policy Portfolio Holder

Date: 31st March 2017

Harlow District Council

Name (printed): Malcolm Morley OBE

Redaction

Signature:

Designation: Chief Executive of Harlow District Council

Date: 31st March 2017

Uttlesford District Council

Name (printed): Councillor Susan Barker

Signature: **Redaction**

Designation: Deputy Leader and Portfolio Holder for Environmental Services

Date: 31st March 2017

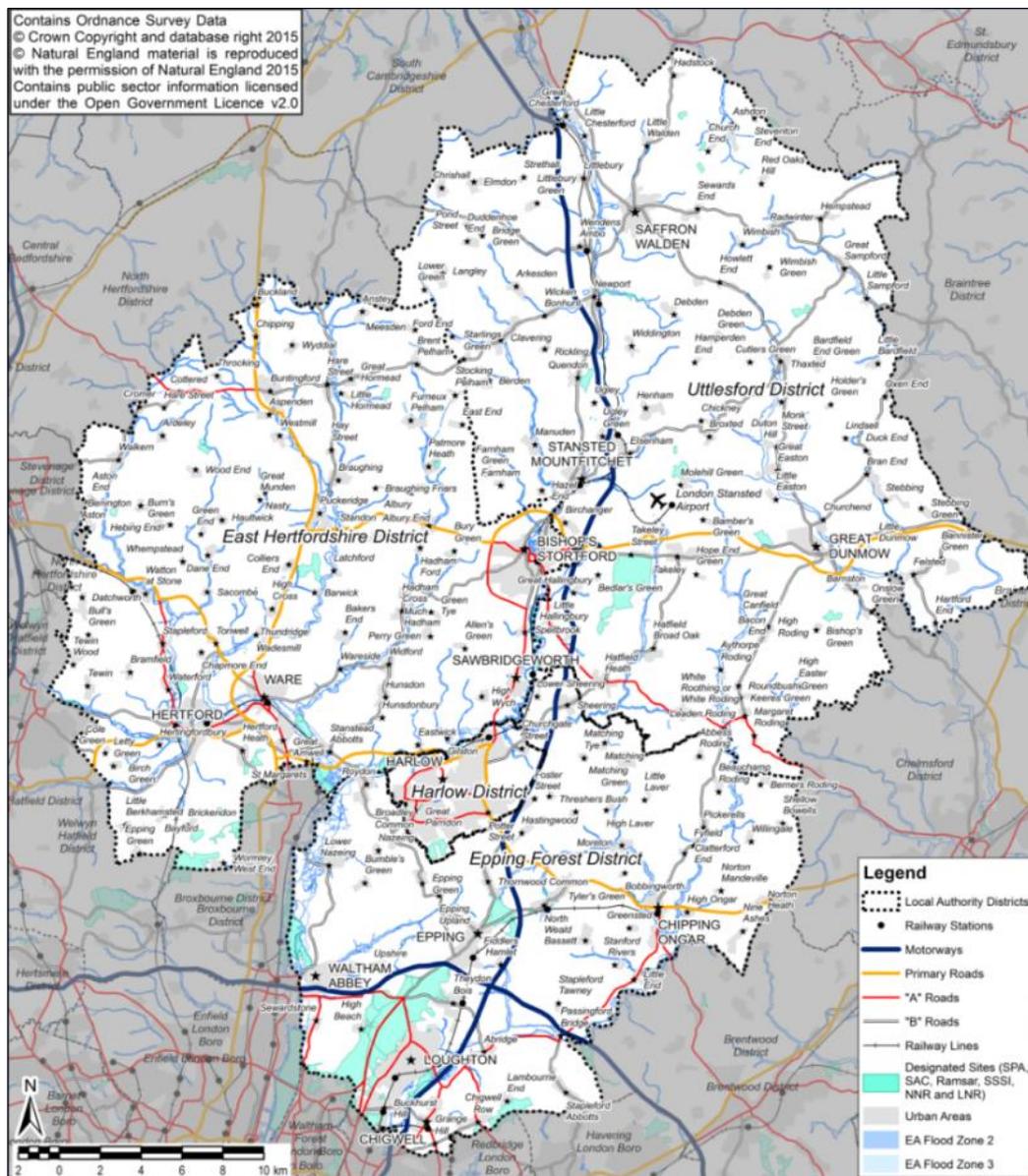
6 Appendices (for reference)

6.1 The following appendices are included for reference purposes only.

Appendix 1 – Background on the West Essex/East Hertfordshire HMA

- A1.1 The West Essex/East Hertfordshire HMA comprises the local authority Districts of East Hertfordshire, Epping Forest, Harlow and Uttlesford. It covers a total of approximately 574 square miles, and as at the 2011 Census, had a total population of 423,733 and a total of 181,336 dwellings.
- A1.2 A significant proportion is designated as Green Belt, and there are large portions of rural hinterland within the area, but also some larger and more urban settlements. The West Essex/East Hertfordshire HMA is centred on the large, 'new town' of Harlow, the biggest service centre within the area.
- A1.3 The West Essex/East Hertfordshire HMA also faces substantial pressure for development, due to population growth, and its proximity to London, and to major transport infrastructure such as the M25 and M11, the London Underground and Stansted Airport.

Figure 8– The West Essex/East Hertfordshire area



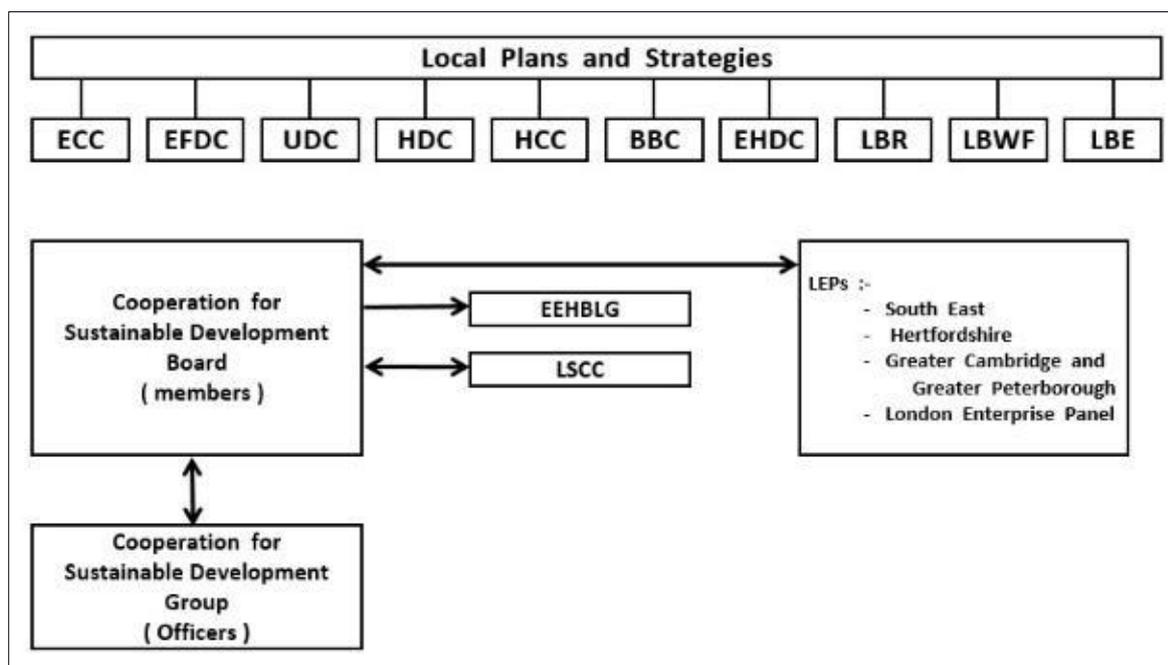
Appendix 2 – Details of the Co-op Member Board and Co-op Officer Group

- A2.1 The West Essex/East Hertfordshire Authorities form the core of the 'Co-operation for Sustainable Development Officer Group' (established February 2014, hereafter referred to as the 'Co-op Officer Group') and the 'Co-operation for Sustainable Development Member Board' (established October 2014, hereafter referred to as the 'Co-op Member Board').
- A2.2 The Co-op Member Board and Co-op Officer Group have been very important in helping to address cross-boundary issues, and they both now have many more members, including other adjacent local authorities, representatives from two County Councils, the Lee Valley Regional Park Authority, and the Corporation of London (Conservators of Epping Forest). The London Stansted Cambridge Consortium is also fully engaged and has been working with the four core authorities and Broxbourne Borough Council, and the Greater London Authority also has a watching brief.
- A2.3 Neither the Co-op Member Board nor Co-op Officer Group has formal decision making powers, however they both make recommendations to the constituent Councils, and to any cross boundary grouping of elected Members which has similar purposes. This approach has proved successful in furthering cross-boundary work and ongoing engagement.
- A2.4 The two groups have also proved a helpful platform for other bodies to engage with several authorities at once, for example the NHS, Highways England, and Thames Water. Both groups meet roughly every month to six weeks.

The Co-op Member Board

- A2.5 The 'Aims and Objectives' of the Co-op Member Board (from the Terms of Reference) are:
- "(1) The Co-operation for Sustainable Development Board will support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one local planning area within West Essex, East Hertfordshire and the adjoining London Boroughs;
- and
- (2) The Board will support better integration and alignment of strategic spatial and investment priorities in West Essex, East Hertfordshire and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory local planning process, where necessary."

Figure 9– Governance structure of the Co-op Member Board



In this figure:

- BBC = Broxbourne Borough Council
- ECC = Essex County Council
- EEHBLG = Enfield, Essex and Hertfordshire Border Liaison Group
- EFDC = Epping Forest District Council
- EHDC = East Hertfordshire District Council
- HCC = Hertfordshire County Council
- HDC = Harlow District Council
- LBE = London Borough of Enfield
- LBR = London Borough of Redbridge
- LBWF = London Borough of Waltham Forest
- LEP = Local Enterprise Partnership
- LSCC = London Stansted Cambridge Consortium
- UDC = Uttlesford District Council

A2.6 The Co-op Member Board issued a joint statement on sign-off of the 2015 Joint SHMA and 2015 Joint Economic Report, which is available here: <http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/532-shma-economic-growth-reports-co-op-board-joint-statement>.

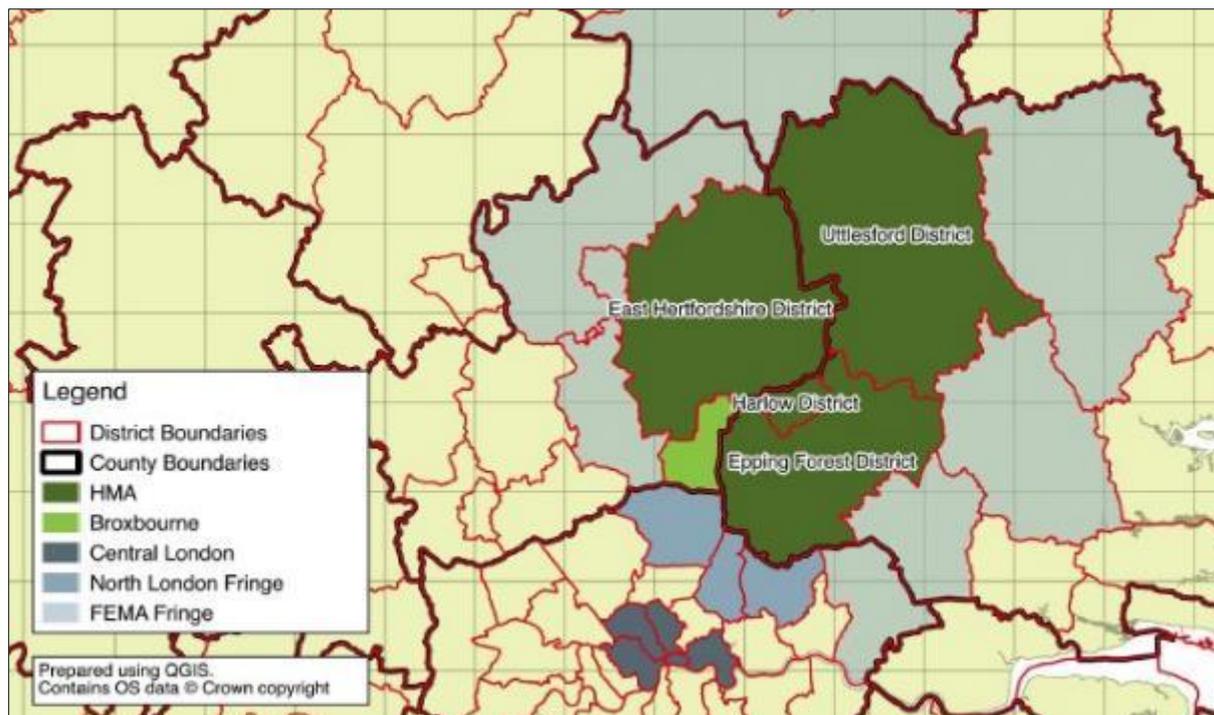
The Co-op Officer Group

A2.7 The Terms of Reference for the Co-op Officer Group set out that the Group aims: *"To achieve effective co-operation between Councils to support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London boroughs.", by, '.... providing a forum across the county boundaries of Essex and Hertfordshire and Greater London for officers of participant councils to develop a shared understanding of community issues, to jointly review the options to achieve the needs of those communities, including growth, and to identify how they should co-operate to enable those needs to be met."*

Appendix 3 – Joint Economic Report

- A3.1 The Joint Economic Report (2015, Hardisty Jones Associates, formal title: Economic Evidence to Support the Development of the OAHN for West Essex and East Hertfordshire) was commissioned by the Co-op Member Board on behalf of the West Essex/East Hertfordshire Authorities.
- A3.2 The 2015 Joint Economic Report found that Epping Forest District Council, East Hertfordshire District Council, Harlow District Council and Uttlesford District Council form an effective Functional Economic Market Area⁹, and so proceeded to assess economic need on that basis.

Figure 10– The Functional Economic Market Area



- A3.3 The 2015 Joint Economic Report gave the following headline results for Objectively Assessed Economic Need (in net additional jobs per annum) for the Functional Economic Market Area as a whole, and for each local authority as a range of net additional jobs per annum, over the Local Plan period 2011-2033.

⁹ The Joint Economic Report highlighted some links from the Functional Economic Market Area to Broxbourne Borough Council, but concluded that it was not within the FEMA. Broxbourne BC had a 'watching brief' on the Joint Economic Report, and through the 'Co-operation for Sustainable Development Officer Group' and 'Co-operation for Sustainable Development Member Board', was involved in discussions about the Joint Economic Report brief and the results.

Figure 11– Headline results from the Joint Economic Report (2015)

Local Authority	a) Projection based on historic share of total jobs	b) Projection based on likely future share of total jobs	OAEN range net new jobs per year 2011-2033
East Hertfordshire DC	505	435	435 – 505*
Epping Forest DC	400	455	400 – 455*
Harlow DC	325	335	325 – 335*
Uttlesford DC	665	675	665 – 675*
Total for FEMA	1,890	1,890	1,890 (same total for each projection)

NB – totals may not sum due to rounding

**These numbers express projected jobs growth as a range per year, for each local authority, for 2011-2033. This is because the Joint Economic Report analysed the projected jobs growth across the FEMA, then modelled apportioning the ‘share’ of jobs in two different ways:*

- a. based on the historic share of FEMA jobs that each authority had; and*
- b. based on the likely future share of FEMA jobs that each authority was likely to have (according to the projections).*

The Joint Economic Report then gave the range of these two numbers as the range for each authority. (The ‘a’ and ‘b’ do not signify the relative importance of one or other apportionment).

A3.4 The full 2015 Joint Economic Report is available to view at:
<http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/507-joint-economic-report>.

Appendix 4 – Strategic OAHN Spatial Options Study

Background

A4.1 The Strategic OAHN Spatial Options Study (“the Spatial Options Study”) was commissioned by the West Essex/East Hertfordshire Authorities to:

- facilitate the development of a memorandum of understanding between the West Essex/East Hertfordshire authorities, which sets out high level numbers and principles for distributing housing growth across the HMA (and which can be subsequently cited at Independent Examinations into the four constituent Local Plans)
- set out the strategic options for how the housing need identified in the SHMA (2015) could be distributed across the HMA, based on an analysis of the existing/emerging policy context and evidence base and provide an evidence-based commentary on the anticipated significant positive and negative impacts of each option relative to the others (including opportunities to deliver infrastructure, employment development, regeneration benefits, etc.) and potential mitigation measures (where relevant); and to assist in producing an MoU.

A4.2 The process of the study is shown in chapter 1 of this MoU.

Identification of the options

A4.3 The Spatial Options Study identified six ‘reasonable’ options, ‘A’ to ‘F’ as follows. Full details of the breakdown of dwellings over the four local authority areas is shown later in this MoU.

Figure 12– The ‘Options’ in the Strategic OAHN Spatial Options study

Option	Details of this option	Rough total dwelling number for option (source of number)	Total dwellings* to be delivered across the HMA 2011-2033
A	Each authority meets its OAHN within its own boundaries	46,100 (2015 SHMA)	48,298 of which 14,150 in wider Harlow area
B	Less development at Harlow and accelerated development on the A120	46,100 (2015 SHMA)	48,148 of which 10,500 in wider Harlow area
C	Less development at Harlow and two new settlements in East Hertfordshire	46,100 (2015 SHMA)	47,648 of which 10,500 in wider Harlow area
D	Maximum growth at Harlow, with reduced allocations in constrained areas of the HMA	46,100 (2015 SHMA)	46,743 of which 17,650 in wider Harlow area

Option	Details of this option	Rough total dwelling number for option (source of number)	Total dwellings* to be delivered across the HMA 2011-2033
E	Higher growth across the HMA, with allocations in constrained areas	49,638 (2012-based household projections)	51,798 of which 17,650 in wider Harlow area
F	Maximum growth across the HMA	roughly 54,600[^] (emerging OAHN according to 2012-based household projections and 2014-based Sub-National Population Projections (SNPP))	57,141 of which 20,895 in wider Harlow area

* These numbers differ from those in the 'Rough Total' column as they are based on the sum of units that actual potential sites could deliver, through the work on strategic sites in and around Harlow. The 'Rough Total' column is only based on the total dwelling numbers given in the SHMA, the 2012-based Household Projections and the 2014-based Sub-National Population Projections, i.e. as a SHMA-wide total not taking into account actual sites

** 'wider Harlow area' means in and around Harlow town, i.e. not just within Harlow District

[^] SHMA consultants ORS have estimated that the impact of the 2014-based Sub-National Population Projections, and 2012-based Household Projections could mean a rise in OAHN to approximately 54,600, but this number is not final. It has been tested through the Spatial Options Study in the interests of assessing what that number might mean for the HMA. Formal review of the OAHN number will take place through a full SHMA update in the future.

The 'Spatial Option'

- A4.4 The Spatial Options Study has identified that the 'Spatial Option' (a hybrid of some of those tested) is the most sustainable spatial distribution of OAHN across the HMA subject to the criteria listed at 3.1. and site availability, viability and deliverability
- A4.5 The 'Spatial Option' is based broadly upon each local authority meeting its OAHN within its own boundaries, and with medium-higher growth in the wider Harlow area. It comprises a total of approximately 51,100 dwellings in the Local Plan period 2011-2033. Broad details of the breakdown by local authority are in Figure 13. Full details of the breakdown are available within the Spatial Options Study.
- A4.6 The 'Spatial Option' dwelling total of approximately 51,100 represents 'planning positively for growth', as it is higher than both the established OAHN within the published 2015 SHMA (46,100), and the OAHN suggested by the 2012-based CLG household projections (49,638 dwellings). It is lower than the SHMA consultants ORS' estimated figure for emerging OAHN taking into account 2012-based Household Projections and the 2014-based Sub-National Population Projections (approximately 54,600), and lower than Option F (57,141) but it still makes good progress towards these higher figures.

Figure 13 - Details of Options A to F and the 'Spatial Option'

Local authority	'The Spatial Option'	Original 'Reasonable Options' as tested					
		Option A	Option B	Option C	Option D	Option E	Option F
East Hertfordshire DC	~ 18,000	Each authority meets its OAHN within its own boundaries (medium growth in and around Harlow)	Less development at Harlow and accelerated development on the A120 (lower growth in and around Harlow)	Less development at Harlow and two new settlements in East Hertfordshire (lower growth in and around Harlow)	Maximum growth at Harlow, with reduced allocations in constrained areas of the HMA (higher growth in and around Harlow)	Higher growth across the HMA, with allocations in constrained areas (maximum growth in and around Harlow)	Maximum growth across the SHMA area (maximum growth in and around Harlow)
Epping Forest DC	~ 11,400	16,789	15,289	18,289	16,264	18,389	20,299
Harlow DC	~ 9,200	11,093	8,943	8,943	10,313	12,993	14,152
Uttlesford DC	~ 12,500	7,900	7,900	7,900	7,900	7,900	9,175
		12,516	16,016	12,516	12,266	12,516	12,616
Housing Market Area Total	~ 51,100	48,298	48,148	47,648	46,743	51,798	56,242 + 759* 57,001
Within which - Greater Harlow total is	~ 16,100	14,150 (medium growth)	10,500 (lower growth)	10,500 (lower growth)	17,650 (higher growth)	17,650 (higher growth)	20,985 (maximum growth)

* Wider Harlow area means in and around Harlow town, i.e. not just within Harlow District

** This 759 consists of additional permissions/completions/windfalls which were identified after the testing of Options A to E was complete, but were available to test within option F.

Appendix 5 – Strategic Vision for LSCC Core Area

- A5.1 The following vision was prepared by the LSCC through working with representatives of East Hertfordshire District Council, Epping Forest District Council, Harlow District Council, Uttlesford District Council and Broxbourne Borough Council¹⁰. The five local authority areas form the LSCC 'Core Area'. Workshops for Members were held at an early stage in its preparation, and both Members and officers have been involved in its refinement. This joint Strategic Vision was presented to the Co-op Member Board, which agreed that each of the five local authorities within the LSCC 'Core Area' would include it within their individual Local Plans, alongside their own Local Plan level vision.
- A5.2 The Councils of Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford form the LSCC Core Area which lies at the heart of the London Stansted Cambridge Corridor (LSCC). This corridor has, over the past decade or more, been the engine of UK growth with its world class industries and businesses.
- A5.3 Over the past five years the Corridor's dynamic, knowledge-based economy has grown at a rate almost double that of the UK average and as a result rates of population growth have increased. Transport links are excellent; with two major rail routes - the East Coast and West Anglia main lines - serving the Corridor. The A1(M), A10 and M11 motorways link its towns and cities with the capital, while London Stansted Airport offers international connections.
- A5.4 With a significant number of jobs in knowledge-based industries, the Corridor is a leading knowledge economy and a showcase for tech industries and firms. There is a high rate of innovation.
- A5.5 The Corridor accounts for 24,700 jobs in the life sciences sector contributing 11% of all national employment. This success is built on research institutes and notable firms and organisations, including Amgen and AstraZeneca in Cambridge, GlaxoSmithKline in Stevenage, and Public Health England in Harlow.
- A5.6 The continued success of the Corridor as a great place to live, work, do business and visit provides the opportunity for the Core Area to deliver greater and lasting prosperity for its residents and businesses. As such the Council is working with its partner authorities in the Core Area to deliver the following LSCC strategic vision for the area up to 2050:

Strategic Vision for the London Stansted Cambridge Corridor (LSCC) Core Area

- A5.7 *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;*

¹⁰ Although this MoU and the HMA cover only the four West Essex/East Hertfordshire Authorities, the MoU itself, the SHMA and Joint Economic Report, and the Spatial Options Study were discussed at the Co-op Member Board and the Co-op Officer Group, of which Broxbourne Borough Council is a member. Broxbourne BC officers and Members were also involved in the drafting and agreement of the LSCC 'Core Area' vision.

- *the delivery of housing, supported by good access to social, leisure, community, health facilities, education and jobs, that meets the needs of local people and supports 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.*

A5.8 *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.*

A5.9 *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.*

Appendix 6 – Governance and Roles (in relation to this MoU)

Appendix 6 A – Signatory organisations

The West Essex/East Hertfordshire local authorities

- A6a.1 The four local authorities form the core of the Co-op Member Board and Co-op Officer Group, and have several pieces of joint evidence in common, including the SHMA, Joint Economic Report, and the Spatial Options Study.
- A6a.2 The four authorities will continue to work together, and wish to use this MoU as a basis for making progress together, and on their individual Local Plans, in order to enable development to be provided in the most sustainable locations within the West Essex/East Hertfordshire area.

Appendix 6 B – Non-signatory organisations

Co-operation for Sustainable Development Member Board and Officer Group

- A6b.1 The Co-op Officer Group and the Co-op Member Board were both established in 2014, and provide a forum for the discussion of cross-boundary issues, the commissioning and management of joint studies, and the formation of recommendations to take back to the individual authorities who form its members. For more details on the working practises of these groups, see Appendix 2.
- A6b.2 The Co-op Member Board and Co-op Officer Group commissioned and oversaw the Joint SHMA, the Joint Economic Report, and the Spatial Options Study. All three of these studies, among others, inform this MoU.
- A6b.3 The Co-op Member Board also has overarching responsibility for the implementation and management of this MoU. The Co-op Officer Group will provide support in this matter, through monitoring the various aims and updating the Co-op Member Board regularly.

Essex County Council and Hertfordshire County Council (as Highways Authorities)

- A6b.4 Essex County Council covers fourteen unitary and district council areas, including the districts of Epping Forest, Harlow and Uttlesford. Hertfordshire County Council covers ten district council areas, including that of East Hertfordshire.
- A6b.5 Both County Councils have responsibility for many matters which are relevant to planning, including but not limited to: education and schools (including adult community education), highways and transport, health and social care, libraries, waste and minerals, and some strategic planning matters.
- A6b.6 Both Essex County Council and Hertfordshire County Council are key members of the Co-op Member Board and Co-op Officer Group, and provide support and guidance on cross-border issues.
- A6b.7 Essex County Council in particular contributes heavily to cross-border work on many different topics, including the Spatial Options Study, and has undertaken the Local Plan transport modelling for the West Essex/East Hertfordshire area, as well as more specific transport modelling, for example, for a new Junction 7A of the M11.

- A6b.8 Hertfordshire County Council produces its own transport modelling but the two County Councils work together to share information from their respective models, which is then fed into the other's model to help inform calculations. This is especially important as the West Essex/East Hertfordshire area crosses the county boundary between Essex and Hertfordshire.
- A6b.9 Although Essex and Hertfordshire County Council are not signatories to this MoU, as highways authorities their officers and Members have provided support in its drafting, and have been involved in its discussion at the Co-op Member Board and Co-op Officer group.
- A6b.10 Both county councils are signatories to the related cross-boundary Transport Infrastructure MoU regarding transport matters, along with the West Essex/East Hertfordshire Authorities.

Highways England

- A6b.11 Highways England (formerly the Highways Agency) is the government company charged with operating, maintaining and improving England's motorways and major 'A' roads (the strategic road network). For the West Essex/East Hertfordshire HMA these routes include the M11, A120 and M25.
- A6b.12 The Strategic Road Network is at the core of our national transport system. Its many arteries connect our major towns and cities, ensure commuters make it to work every day, connect businesses with their suppliers and customers, and help millions of us visit our friends and families.
- A6b.13 Highways England is a statutory consultee in the planning system. In discharging this responsibility, it acts as a proactive partner. Highways England will support economic growth, providing the conditions that help businesses to succeed and grow, facilitating new development around the road network, and supporting investment and trade.
- A6b.14 Highways England is not a signatory to this MoU, but its officers have provided support in its drafting, and are heavily involved in the related cross-boundary Transport Infrastructure MoU regarding transport matters, along with Essex and Hertfordshire County Councils, and the West Essex/East Hertfordshire Authorities.
- A6b.15 Once Local Plans are adopted, Highways England will continue to work with the West Essex/East Hertfordshire Authorities to ensure that its strategic planning is fully cognisant of their policies and proposals. Highways England is developing the next round of Route Strategies, which will be a key building block in the Government's next Road Investment Strategy. Route Strategies bring together information from motorists, local communities, construction partners, environmental groups and across the business sector to help better understand the performance of the strategic road network and shape investment priorities to improve the service for road users and support a growing economy. The evidence collected and the indicative solutions identified - along with the outcomes of the strategic studies - will be the foundation of Highways England's first 'Strategic Road Network Initial Report' to be submitted to Government in 2017.

London Stansted Cambridge Consortium

- A6b.16 The London Stansted Cambridge Consortium (LSCC)¹¹ was formed in June 2013 as a strategic partnership of public and private organisations covering the area north from the Royal Docks, Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the

¹¹ www.lsc.co

Lee Valley, the M11, A1 and A10 road, the East Coast and West Anglia Mainline rail corridors to Stevenage, Harlow and Stansted, and through to Cambridge and Peterborough.

- A6b.17 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 corridor. It was formed to organise and promote what is a clear economic area, with strong inter-connections; commuting to work and learn patterns, clusters of industries and supply chains.
- A6b.18 The LSCC has supported the West Essex/East Hertfordshire Authorities in cross-boundary matters, particularly relating to the shared Vision for the LSCC Core Area (see section 4 of this MoU).

Advisory Team for Large Applications (ATLAS)

- A6b.19 Relevant elected Members from the Co-op Member Board have been involved in a series of workshops facilitated by the Homes and Communities Agency's Advisory Team for Large Applications (ATLAS)¹² aimed at specifically considering the issue of expansion in and around Harlow and role that potential strategic sites could play.
- A6b.20 A number of strategic expansion sites are coming forward as part of Local Plan processes. The precise distribution and scale of development from the sites will be subject to further evidence gathering, decision making and Independent Examination of Local Plans.

¹² www.atlasplanning.com

Appendix 7 – Key Member and Officer contacts

Figure 14 - Key Member and Officer contacts

Organisation	Contact name	Role	Email address
East Hertfordshire District Council	Cllr Linda Haysey	Leader of the Council	linda.haysey@eastherts.gov.uk
	Kevin Steptoe	Head of Planning & Building Control	kevin.steptoe@eastherts.gov.uk
	Claire Sime	Planning Policy Manager	claire.sime@eastherts.gov.uk
Epping Forest District Council	Cllr John Philip	Planning Policy Portfolio Holder	john.philip1@ntlworld.com
	Alison Blom-Cooper	Interim Assistant Director	ablomcooper@eppingforestdc.gov.uk
	David Coleman	Planning Policy Manager	dcoleman@eppingforestdc.gov.uk
Harlow District Council	Cllr Danny Purton	Portfolio Holder for Environment	danny.purton@harlow.gov.uk
	Dianne Cooper	Planning & Building Control Manager	dianne.cooper@harlow.gov.uk
	Paul MacBride	Forward Planning Manager	paul.macbride@harlow.gov.uk
Uttlesford District Council	Cllr Susan Barker	Deputy Leader/Portfolio Holder for Environmental Services	cllrbarker@uttlesford.gov.uk
	Richard Fox	Planning Policy Team Leader	rfox@uttlesford.gov.uk
Essex County Council	David Sprunt	Strategy & Engagement Manager (Highways)	david.sprunt@essex.gov.uk
Hertfordshire County Council	Roger Flowerday	Development Manager (Highways)	roger.flowerday@hertfordshire.gov.uk
Highways England	Andy Jobling	Asset Development Manager	andy.jobling@highwaysengland.co.uk

Memorandum of Understanding on Highways & Transportation Infrastructure for the West Essex/East Hertfordshire Housing Market Area

between

Essex County Council
Hertfordshire County Council
Highways England

East Hertfordshire District Council
Epping Forest District Council
Harlow District Council
Uttlesford District Council

February 2017



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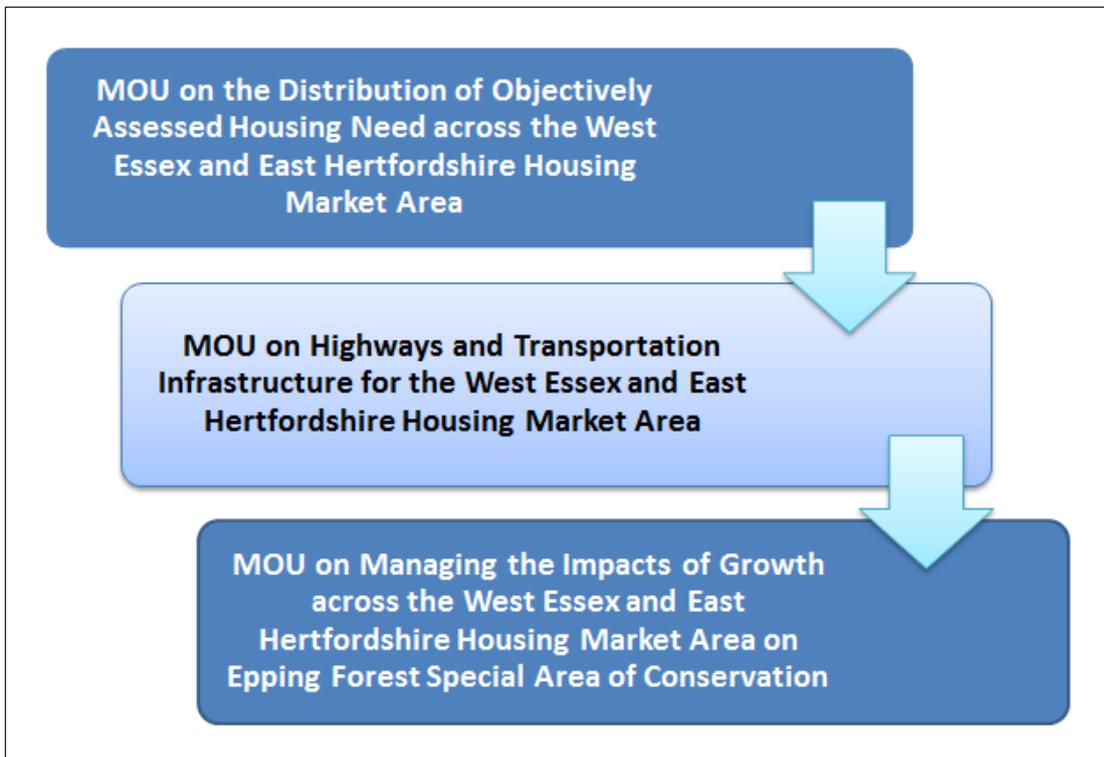
1 Background

- 1.1 Local Plans set out policies to guide development in a locality, including policies and proposals for specific sites to meet the housing, employment, environmental and social needs of the area. The suitability of sites for any of these uses depends on several factors, including transport matters such as local traffic flow, road and transport connections, and options for sustainable travel.
- 1.2 The preparation of Local Plans provides an opportunity to support a pattern of development that minimises the need for travel, minimises journey lengths, encourages sustainable travel, and promotes accessibility for all. This can contribute to the achievement of environmental objectives and reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.
- 1.3 East Hertfordshire DC, Epping Forest DC, Harlow DC and Uttlesford DC (also referred to as the 'West Essex/East Hertfordshire authorities' in this Memorandum of Understanding (MoU)) have a substantial history of co-ordinated working on strategic planning issues such as assessing housing need and planning for future growth. Essex County Council and Hertfordshire County Council have also been involved in cross-border working with the authorities for many years on many different topics including transport matters related to Local Plans.

The three inter-related Memoranda of Understanding

- 1.4 This MoU is one of a group of three related memoranda of understanding. The other two deal with the distribution of Objectively Assessed Housing Need (OAHN) across the West Essex/East Hertfordshire Housing Market Area (HMA), and managing the impacts of growth across the HMA on the Epping Forest Special Area of Conservation, as shown in Figure 1.

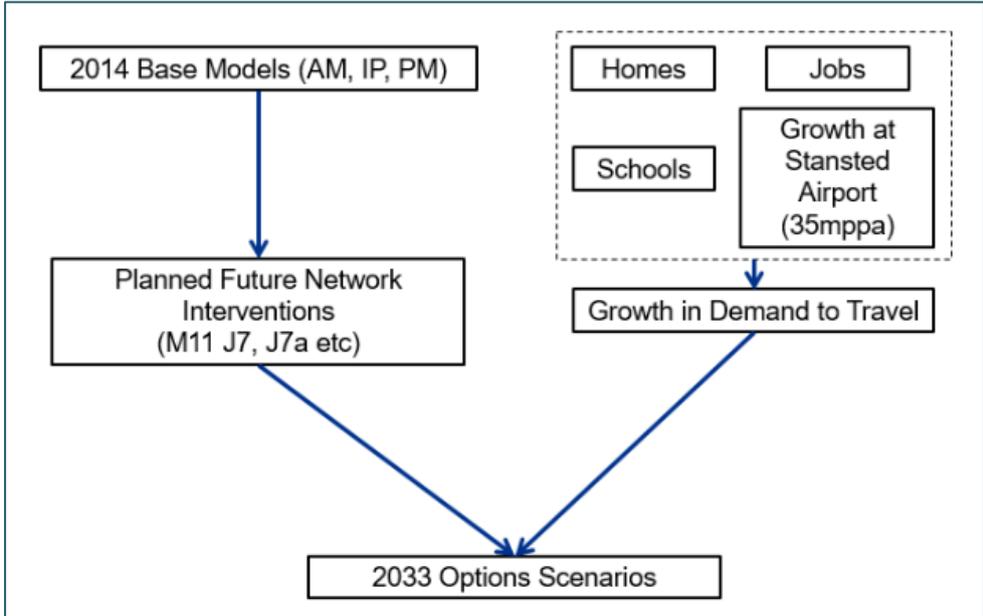
Figure 1 – Inter-related Memoranda of Understanding



Transport modelling relating to Strategic OAHN Spatial Options study

- 1.5 In conjunction with the West Essex/East Hertfordshire authorities, Essex County Council, Hertfordshire County Council and Highways England been involved in the Strategic OAHN Spatial Options study, which sets out the options for how the housing need identified in the West Essex/East Hertfordshire SHMA (2015 – and also emerging data indicating how the OAHN might change) could be distributed across the housing market area, based on an analysis of the existing/emerging policy context and evidence base.
- 1.6 One of the key ways in which the range of potential OAHN spatial distribution options were analysed was through strategic transport modelling carried out by Essex County Council, which was designed to assess the varying impacts to traffic and transportation. (This transport modelling is high-level in nature, and will be supplemented by district-wide modelling for the four West Essex/East Hertfordshire Local Plans when considering local-level issues).
- 1.7 This strategic highway modelling was carried out using Essex County Council’s Visum model, which was agreed by Highways England in 2016.
- 1.8 The assumptions within the strategic highway modelling, as the baseline, are that the following will take place -
 - planned improvements to M11 junction 7;
 - planned short-term improvements at M11 junction 8;
 - implementation of a new J7A on the M11;
 - A120 Little Hadham Bypass;
 - Public Health England moves to Harlow town (as announced by government);
 - London Stansted Airport growth reaches 35 million passengers per annum; and
 - TEMPRO¹ growth outside the West Essex/East Hertfordshire Housing Market Area.
- 1.9 The overall process for the highway modelling is shown in figure 2.

Figure 2 – Overview of Forecasting Process for the Highway Modelling:



¹ TEMPRO (Trip End Model Presentation Program) is the industry standard transport planning software tool for estimating traffic growth, which is required when assessing the traffic impact of a development on the local highway network.

- 1.10 The strategic highway modelling assessed five OAHN spatial distribution options A to E, for the Housing Market Area, which were as detailed in Appendix 1. Please also refer to the overarching 'Distribution of Objectively Assessed Housing Need across the West Essex and East Hertfordshire Housing Market Area' MoU for more details of the five options A to E. Option A1 was a variation to Option A, having a different spatial distribution around Harlow.
- 1.11 Following discussions with managers at Princess Alexandra Hospital (Harlow), and between the West Essex/East Hertfordshire officers, population data was explored to consider the effects on catchment area of a new hospital site either at Gilston (in East Hertfordshire District) or near a new junction 7A on the M11 (in Epping Forest District), as Princess Alexandra Hospital wishes to relocate.
- 1.12 The strategic highway modelling identified percentage traffic flow changes resulting from the Options A to E, and A1. Whilst all of the Options A to C including A1 are predicted to cause broadly similar increases in congestion and commensurate reductions in average vehicle speeds, with the higher growth (in and around Harlow) options D & E these approach 20% greater reductions in average vehicle speeds. In addition the higher growth options D & E both showed significant stress in specific areas of the network and are not recommended to be taken forward in transport terms, unless further major interventions were to be delivered during the Plan period (2011-2033). However more detailed assessment work is ongoing.
- 1.13 It should be noted that these model results are early indications based on initial forecast modelling, and there will of course be further modelling and sensitivity testing as work progresses on the four West Essex/East Hertfordshire Local Plans.
- 1.14 Since undertaking this analysis two additional spatial options have been identified. The first of these, 'Option F', aims to meet the maximum growth across the HMA. The second is the 'Spatial Option' which reflects the latest figures for completions, permissions and windfalls, and is based on spring 2016 household and population projections. It takes into account feedback from the initial highway modelling processes. It is the view of the Co-operation for Sustainable Development Officer Group that this is the most appropriate spatial option.
- 1.15 The strategic highway modelling thus played a key role in the recommendation and selection of the 'Spatial Option' to deliver the OAHN, which is as follows.

Figure 3 – The 'Spatial Option' of OAHN 2011-2033

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	~ 18,000
Epping Forest District Council	~ 11,400
Harlow District Council	~ 9,200
Uttlesford District Council	~ 12,500
Total across the HMA	~ 51,100
...of which the area in and around Harlow* will provide	~ 16,100

**in and around Harlow' refers to Harlow town as well as around Harlow in adjoining districts*

2 Purpose of this Memorandum of Understanding

2.1 This Highways and Transportation Infrastructure MoU confirms the collaborative working arrangements that exist between the three highway authorities of Highways England, Essex County Council and Hertfordshire County Council.

2.2 The purpose of this MoU is to ensure that Essex County Council, Hertfordshire County Council and Highways England (supported by the West Essex/East Hertfordshire authorities), together fulfil the following requirements:

1. to contribute to the delivery of the vision set out in section 3 of this MoU;
2. to seek/support/work towards addressing the strategic highway issues identified through modelling, and some of the emerging transport issues are outlined in section 4 of this MoU;
3. to work collaboratively to identify, develop and secure/deliver enabling highway infrastructure schemes supporting the 'Spatial Option' of the Objectively Assessed Housing Need within the West Essex/East Hertfordshire Housing Market Area, as set out above and within the overarching 'Distribution of Objectively Assessed Housing Need across the West Essex and East Hertfordshire Housing Market Area' MoU;
4. to continue to engage with the West Essex/East Hertfordshire Councils (primarily through the Co-operation for Sustainable Development Officer Group and the Co-operation for Sustainable Development Member Board) at an early stage, in detail, and on a continuing basis, with the intention of avoiding possible objections being made at consultation stages and/or at Independent Examination of the individual Local Plans;
5. to continue to co-operate during the implementation and monitoring of the individual West Essex/East Hertfordshire Councils Local Plans;
6. to liaise with each other on any future joint evidence work which may be required to address the strategic highway issues;
7. to help demonstrate compliance with the Duty to Co-operate during the Independent Examination of the West Essex/East Hertfordshire authorities' Local Plans
8. to inform and support the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation' MoU (see Figure 1).

2.3 This MoU specifically covers the area directly affected/impacted by the growth in and around Harlow and is NOT intended to cover the whole of the HMA, with specific district level interventions being identified by each district individually.

2.4 The schemes identified within this MoU are those major strategic schemes which would be required to meet the level of growth being proposed within and around the Harlow area. It does not include specific site level interventions, many of which may still be significant in themselves.

3 Vision

- 3.1 The three highway authorities are committed to co-operating with the planning authorities for the West Essex/East Hertfordshire HMA to enable sustainable communities by providing a better understanding of key highways infrastructure, including public transport and sustainable modes, that will be required to support those developments.
- 3.2 We recognise that we have a responsibility to support and develop a more coordinated approach to planning on the strategic and local highway networks to provide sustainable communities.
- 3.3 All parties are fully committed to jointly working together to resolve key highway and transportation issues, primarily those outlined in section 4 of this MoU, but also any further issues which come to light in future.

4 Emerging key highway issues

- 4.1 While the following primarily focus on highways related infrastructure, the overall impact of the infrastructure also seeks to address rail and aviation issues indirectly through provision of improved access

Highways England Network Improvements (M11)

M11 Junction 7/7A

- 4.2 M11 Junction 7 serves as the main point of access to the strategic road network for the town of Harlow and the surrounding areas. The interchange is nearing capacity, which is constraining access to and from the M11. This in turn is constraining Harlow's growth opportunities. Highways England and Essex County Council are investigating solutions and are working together to develop improvements to Junction 7 and proposals for a new Junction 7A. For further details of the particular issues regarding Junction 7 and 7A, please see Appendix 2.
- 4.3 The following actions relating to these junctions are already complete:

Figure 4 – Completed actions relating to M11 Junction 7/7A

Completed Actions
Funding for improvements to Junction 7 has been obtained under Road Investment Strategy 1 (RIS1)
Essex County Council has completed four years of work on investigating options to improve Harlow's road network. A strategic options appraisal showed that the new junction 7A on the M11 is optimum solution to overcome the problems.
Essex County Council ran public consultation on the location and design of the new Junction 7A (together with widening of Gilden Way) in summer 2016

- 4.4 The signatories to this MoU recognise that the following actions will be necessary with regard to Junction 7/7A:

Figure 5 – Future actions relating to M11 Junction 7/7A

Action	Responsible authority
Essex County Council will announce the preferred route for J7A, by Autumn 2016	Essex County Council
Essex County Council will aim to submit a planning application for Junction 7A by Winter 2016/17	Essex County Council
West Essex/East Hertfordshire District Councils will provide support for J7A within their Local Plans, as appropriate to their area and support will be written into Local Plans which will go out to consultation in Autumn/Winter 2016	West Essex/East Hertfordshire District Councils
Highways England will continue to develop the RIS1 proposals for improvements to Junction 7	Highways England

Action	Responsible authority
RIS1 to support delivery of M11 7A before M11 J7 but will revert back to 7 if 7A isn't confirmed	Essex County Council/Highways England
Highways England will continue to provide on-going support and advice through the Co-op. Officer Group and Member Board on how best to achieve funding for J7A	Highways England / Essex County Council
Funding towards the delivery of M11 J7 and/or J7A will be sought from developers	Harlow/Epping Forest/Uttlesford and East Hertfordshire District Councils

M11 Junction 8

- 4.5 M11 Junction 8 serves as the main point of access to the strategic road network for the town of Bishop's Stortford and its surrounding area, as well as London Stansted Airport. It also provides access to the A120 and the B1256, which provides an alternative access to the strategic road network for Uttlesford District.
- 4.6 Short to medium term proposals to increase capacity through the interchange have been identified and are expected to commence in 2018. Longer term significant improvements will be needed at Junction 8 to support local growth and the expansion of London Stansted Airport. For further details of the particular issues regarding Junction 8 please see Appendix 3.
- 4.7 The following actions relating to Junction 8 are already complete:

Figure 6 – Completed actions relating to M11 Junction 8

Completed Actions
Essex County Council has identified short to medium term improvements at Junction 8. £1,000,000 has been secured from the Greater Cambridge Greater Peterborough Local Enterprise Partnership to help fund the short to medium term improvements at Junction 8.
Essex County Council has submitted feedback to Highways England's Route Strategies, which will be the foundation of Highways England's first 'Strategic Road Network Initial Report' to be submitted to Government in 2017 and will inform the need for a strategic intervention at Junction 8 to Road Investment Strategy 2 (RIS2).
Essex County Council has submitted a bid to Highways England's Growth and Housing Fund (GHF) for the short to medium term improvements at Junction 8 (this bid is successfully through the first assessment stage)
Essex County Council has submitted a bid for Local Growth Fund round 3 funding to the South East Local Enterprise Partnership (SELEP) for the short to medium term scheme (this bid is successfully through the first assessment stage)

- 4.8 The signatories to this MoU recognise that the following actions will be necessary with regard to Junction 8:

Figure 7 – Future actions relating to M11 Junction 8

Action	Responsible authority
Essex County Council to continue to work with all relevant funding bodies to secure the funding of the short to medium term improvements at Junction 8 during 2016/17	Essex County Council

Action	Responsible authority
The delivery of identified short to medium term improvements at Junction 8 will be constructed in approximately 2018/19 subject to funding and programme	Highways England / Essex County Council
Funding for a strategic intervention for Junction 8 with enhanced junction design will be pursued via RIS2, and through contributions from developers	Highways England / Essex County Council/Hertfordshire County Council/East Hertfordshire and Uttlesford District Councils
Strategic intervention to Junction 8 will be delivered within the Local Plan period	Highways England / Essex County Council

County Highway and Transportation Network Improvements

4.9 As well as the strategic improvements outlined above, the modelling work identified some key routes on which improvements would be required across all tested scenarios. These include the following:

- A414 corridor through Harlow (sections not currently either being upgraded or programmed for upgrading);
- A414 The provision of a second River Stort crossing to relieve the Harlow network and also help provide capacity for the provision of a north/south Sustainable Transport Corridor;
- A414 west of Harlow - Amwell Junction with the A10;
- Harlow A1025 Second Avenue Corridor (A414 to Velizy Avenue);
- Relocation of Princess Alexandra Hospital (site to be confirmed);
- A120 around Bishop's Stortford – With any long term intervention at M11 junction 8 consideration will need to be given to the impact on the A120 around Bishop's Stortford as to whether intervention(s) over and above that already agreed to facilitate development are required; and
- There will be a need to assess the impact that strategic interventions on the M11 junctions 7, and 8, and the implementation of the new junction 7A, will have on the Bishop's Stortford and Sawbridgeworth local highway network.

4.10 The A414 through Harlow to the A10 should be considered moving forward as part of an overall approach to the A414 corridor between the M11 and A1 with the Highway Authorities of Essex and Hertfordshire working together to provide the optimum outcome for both authorities.

Figure 8 – Future actions relating to County Highway & Transportation Network

Key Issue	Likelihood of identifying solution	Deliverability Issues	Phasing (years)*	Responsibility
A414 Corridor	High	Funded by developers	6 -10	East Hertfordshire DC Essex CC Harlow DC Hertfordshire CC
A1025 Second Avenue, Harlow	High	Funded by developers	6 -10	Essex CC Epping Forest DC Harlow DC

Key Issue	Likelihood of identifying solution	Deliverability Issues	Phasing (years)*	Responsibility
Second River Stort Crossing	High	Funded by developers	6 -10	Hertfordshire CC East Hertfordshire DC Essex CC Harlow DC
Multi-modal sustainable corridor, north-south through Harlow town	High	Funded by developers	6 -10	East Hertfordshire DC Epping Forest DC Essex CC Harlow DC Hertfordshire CC
Multi-modal sustainable corridor, east-west through Harlow town	High	Funded by developers	6 -10	Epping Forest DC Essex CC Harlow DC
Abercrombie Way/Third Avenue	High	Funded by developers	6 -10	Epping Forest DC Essex CC Harlow DC
A414 Amwell Junction with the A10	High	Funded by developers	6 -10	East Hertfordshire DC Hertfordshire CC
A120 Bishop's Stortford – B1383 Stansted Road Roundabout	High	Funding already in place	0 - 5	Hertfordshire CC Essex CC

**indicative timescale dependent on how developments come forward during the plan period*

Future Co-operation and Planning

- 4.11 Whilst the above schemes and projects have emerged as the conceptual solutions to the growth, before they can be progressed they will all require further transport modelling, business cases to be developed and assessment against policies and strategies of the respective highway authorities.
- 4.12 It will be necessary to monitor the impacts of both the Highways England and County Network Schemes as these are delivered. This is crucial for planning for future interventions beyond the plan period. Due to the long timescales associated with major scheme delivery it is important that this work continues throughout the plan period to 2033, so that future growth in the next plan period can be coordinated and accommodated without delays while the planning and delivery of infrastructure is secured.

5 Securing funding

- 5.1 There are a number of different funding sources available to deliver the various key pieces of infrastructure identified within the MoU, which include Section 106 agreements or Community Infrastructure Levy (CIL - but with S106 being the key contributor to major schemes), Section 278 agreements, government funding streams administered through South East LEP, Hertfordshire LEP, RIS2 and subsequent funding periods, together with other funding opportunities as these arise.
- 5.2 There is a clear distinction between the national infrastructure requirements and the local and county infrastructure requirements which have been identified. Significant funding would be expected through national funding streams for the major pieces of infrastructure, such as the long term solution at M11 J8. However, this would not, and should not, preclude contributions, sometimes major contributions, from developers through S106 towards these schemes. Delivery of the county schemes identified as being required to deliver the levels of growth in the OAHN would be expected to be primarily, or totally, funded by developers through Section 106 or similar contributions, although other funding sources as identified above could provide for the delivery of these schemes in part or in total as necessary.
- 5.3 Further work will be required to firm up costings of the proposed mitigations to establish affordability. The intention is to put in place a single infrastructure delivery plan (IDP) covering all of the interventions, setting out when they are required and what developments will be expected to contribute towards the scheme. The individual IDP's supporting each of the Local Plans will need to reflect these arrangements.
- 5.4 Subject to para 4.11, collective agreement will need to be reached with respect to phasing of the interventions and pooling of contributions to fund delivery in the agreed order. Decisions to proceed with an identified mitigation should be taken by the Co-operation for Sustainable Development Member Board

6 Timing

- 6.1 This Memorandum of Understanding has immediate effect and will remain in place until adoption of the last of the West Essex/East Hertfordshire authorities' Local Plans and all identified schemes have been delivered as required, unless this MOU is reviewed and replaced before this. This document will be kept under review. It is based on the most up to date evidence available at the time of writing.

7 Key contact details

7.1 The primary contacts for this Memorandum of Understanding are as follows.

Figure 9 – Key officer contacts

Organisation	Contact name and email address
Essex County Council:	David Sprunt david.sprunt@essex.gov.uk
Hertfordshire County Council:	Roger Flowerday roger.flowerday@hertfordshire.gov.uk
Highways England:	Andy Jobling andy.jobling@highwaysengland.co.uk
East Hertfordshire District Council	Claire Sime Claire.sime@eastherts.gov.uk
Epping Forest District Council	Amanda Thorn AThorn@eppingforestdc.gov.uk
Harlow District Council	Paul MacBride Paul.Macbride@harlow.gov.uk
Uttlesford District Council	Richard Fox RFox@uttlesford.gov.uk

8 Signatures and seals

8.1 This Memorandum of Understanding is signed by and duly authorised for and on behalf of:

Essex County Council

Name (printed): Councillor Kevin Bentley

Signature: **Redaction**

Designation: Deputy Leader and Cabinet Member for Economic Growth and Partnerships

Date: 22nd March 2017

Hertfordshire County Council

Name (printed): Councillor Derrick Ashley

Signature: **Redaction**

Designation: Cabinet Member for Environment, Planning and Transport

Date: 22nd March 2017

Highways England

Name (printed): Simon Amor

Signature: **Redaction**

Signature:

Designation: Asset Development Manager

Date: 22nd March 2017

East Hertfordshire District Council

Name (printed): Councillor Linda Haysey

Signature: **Redaction**

Designation: Leader of the Council

Date: 22nd March 2017

Epping Forest District Council

Name (printed): Councillor John Philip

Signature: **Redaction**

Designation: Planning Policy Portfolio Holder

Date: 22nd March 2017

Harlow District Council

Name (printed): Malcolm Morley OBE

Signature: **Redaction**

Designation: Chief Executive of Harlow District Council

Date: 22nd March 2017

Uttlesford District Council

Name (printed): Councillor Susan Barker

Signature: **Redaction**

Designation: Deputy Leader and Portfolio Holder for Environmental Services

Date: 22nd March 2017

9 Appendices

Appendix 1 - Options tested within the Strategic Highway Modelling

A1.1 The strategic highway modelling assessed the six OAHN spatial distribution options for the Housing Market Area, which were as follows.

Figure 10 – ‘Reasonable Alternatives’ in the Strategic OAHN Spatial Options study

Option	Details of this option	Rough total dwelling number for option (source of number)	Total dwellings to be delivered across the HMA 2011-2033
A	Each authority meets its OAHN within its own boundaries	46,100 (2015 SHMA)	48,298 of which 14,150 in wider Harlow area
B	Less development at Harlow and accelerated development on the A120	46,100 (2015 SHMA)	48,148 of which 10,500 in wider Harlow area
C	Less development at Harlow and two new settlements in East Hertfordshire	46,100 (2015 SHMA)	47,648 of which 10,500 in wider Harlow area
D	Maximum growth at Harlow, with reduced allocations in constrained areas of the HMA	46,100 (2015 SHMA)	46,743 of which 17,650 in wider Harlow area
E	Higher growth across the HMA, with allocations in constrained areas	49,638 (2012-based household projections)	51,798 of which 17,650 in wider Harlow area
A1	Variation to option A removing Katherines, reducing Harlow East and adding more to Harlow South	46,100 (2015 SHMA)	48,298 of which 14,150 in and around Harlow

Figure 11 – Additional Spatial Options, not yet fully tested

Option	Details of this option	Rough total dwelling number for option (source of number)	Total dwellings to be delivered across the HMA 2011-2033
F	Maximum growth across the HMA	roughly 54,600[^] (emerging OAHN according to 2012-based household projections and 2014-based Sub-National Population Projections (SNPP))	57,141 of which 20,895 in wider Harlow area
The 'Spatial Option' **	Reflects latest figure for completions, permissions and windfall assumptions and is considered to be the most appropriate spatial option;	n/a	roughly 51,100 of which roughly 16,100 in and around Harlow

* See the 'Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area MoU' for more details of 'the 'Spatial Option'.

Appendix 2 - M11 Junction 7 improvements and the new junction 7A

- A2.1 M11 Junction 7 serves as the main point of access to the strategic road network for the town of Harlow and the surrounding areas. It also provides access to the A414 (a county principal road), which connects Chelmsford (to the east) and Hertford (to the west); and the B1393 which forms a local link between the settlements of Epping and Harlow and provides access to the strategic road network for much of Epping Forest District.
- A2.2 The M11 Junction 7 interchange is nearing capacity, which is constraining access to and from the M11. This in turn is constraining Harlow town's growth opportunities. Highways England and Essex County Council are investigating solutions and are working together to develop improvements to Junction 7, and a proposal for a new Junction 7A. These solutions will deliver the best benefits within project constraints for Harlow district, and the surrounding districts, by enhancing access to the M11 and acting as an enabler for the housing and economic growth as set out in the 'Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area MoU', and in the emerging Local Plans of Harlow DC, Epping Forest DC, East Hertfordshire DC, and Uttlesford DC.
- A2.3 Highways England is developing the Road Investment Strategy Period 1 scheme: 'M11 Junction 7 junction upgrade – extra capacity on junction 7 near Harlow', which aims to reduce the current congestion around the junction. Highways England is at the very early stages of developing these proposals and once they have been refined, the scheme will go out to public consultation. Works are expected to start by 2020.
- A2.4 Essex County Council are leading on proposals to create a new junction on the M11 (7A) to the east of Harlow that will enable housing and commercial development within and around Harlow and relieve some of the pressure on the existing Junction 7 to the south. Proposals went out to public consultation in 2016. Funding is yet to be identified and all authorities have committed to promoting this scheme for funding by the future Road Investment Strategy programme.
- A2.5 Essex County Council and Highways England have formed the Essex Strategic Highway Programme Group that meets monthly and will provide guidance in helping the project teams to work collaboratively.

Appendix 3 - M11 Junction 8 Improvements

- A3.1 M11 Junction 8 serves as the main point of access to the strategic road network for the town of Bishop's Stortford and its surrounding area, as well as London Stansted Airport. It also provides access to the A120, an east-west route connecting Standon at the most westerly point with Harwich on the east coast; and the B1256, which provides an alternative access to the strategic road network for Uttlesford District.
- A3.2 Growth is planned both in and around Bishop's Stortford (within East Hertfordshire District) and within Uttlesford District, in addition to potential expansion of London Stansted Airport, both of which are likely to increase traffic demands at Junction 8.
- A3.3 Short to medium term proposals to increase capacity through the interchange have been identified. The Greater Cambridge Greater Peterborough Local Enterprise Partnership has secured £1,000,000 to undertake these improvements. Proposals include widening on the A120 link from Bishop's Stortford, a dedicated free flow left turn from the M11 southbound exit slip to the A120 eastbound, and widening on the M11 northbound exit slip. These proposals are estimated to cost upwards of £5,000,000; therefore, there will also need to be developer contributions. Timescales for the delivery of these proposals are still to be confirmed but are expected in 2018.
- A3.4 Longer term significant improvements will be needed at Junction 8 to support expansion of London Stansted Airport and growth identified by the West Essex/East Hertfordshire Housing Market Area. Highways England is developing the next round of Route Strategies, which will be a key building block in the Government's next Road Investment Strategy. Route Strategies bring together information from motorists, local communities, construction partners, environmental groups and across the business sector to help better understand the performance of the strategic road network, to shape investment priorities, to improve the service for road users and to support a growing economy. The evidence collected and the indicative solutions identified - along with the outcomes of the strategic studies - will be the foundation of Highways England's first 'Strategic Road Network Initial Report' to be submitted to Government in 2017.
- A3.5 Through the Route Strategies we are committed to highlighting the need for investment in Junction 8.

Memorandum of Understanding

Managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation

between

East Hertfordshire District Council
Epping Forest District Council
Harlow District Council
Uttlesford District Council

Essex County Council
Hertfordshire County Council

City of London Corporation (Conservators of Epping Forest)
Natural England

February 2017



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1. Introduction

- 1.1 The *Conservation of Habitats and Species Regulations 2010*¹ (“the Habitat Regulations”) set out that where a land use plan, either alone or in combination, is likely to have a significant effect on a European site, the plan-making authority must make an appropriate assessment of the implications for the site taking into account the site’s conservation objectives. The local authorities party to this Memorandum of Understanding (MoU) are working together under the Duty-to-Cooperate as defined by the Localism Act 2011. The areas of proposed Local Plan development covered by this MoU are within the bounds of the four district local authorities which make up a Housing Market Assessment (HMA) area, agreed under a separate Memorandum of Understanding². A map of the area covered by this MoU is shown at **Appendix 1**.
- 1.2 There are a number of significant areas for nature conservation within the HMA. Epping Forest is highlighted as a habitat that requires more detailed attention. It is the largest public open space within and adjoining London, covering around 2,450 hectares. It stretches from Manor Park to just north of Epping, with the main body of the Forest being located to the west of Loughton. Two thirds of the Forest has been designated a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC). The SAC status was confirmed in April 2005, with the primary reasons for designation being the presence of beech forest habitat and stag beetles. Dry and wet heath habitats are also cited as key features. Detailed information about the designation is available from the Joint Nature Conservation Committee website³.
- 1.3 There are known current challenges to the integrity of the part of the SAC which falls within the boundary of Epping Forest District Council. These include in particular, threats posed by air pollution and recreational pressures. The main threats and challenges are set out in Natural England’s (NE’s) Site Improvement Plan (SIP) for Epping Forest SAC (NE 2015)⁴.

¹ 2010 Conservation of Habitats and Species Regulations
<http://www.legislation.gov.uk/ukxi/2010/490/contents/made>

² 2016 Memorandum of Understanding: Distribution of Objectively Assessed Need across the West Essex/East Hertfordshire Housing Market Area

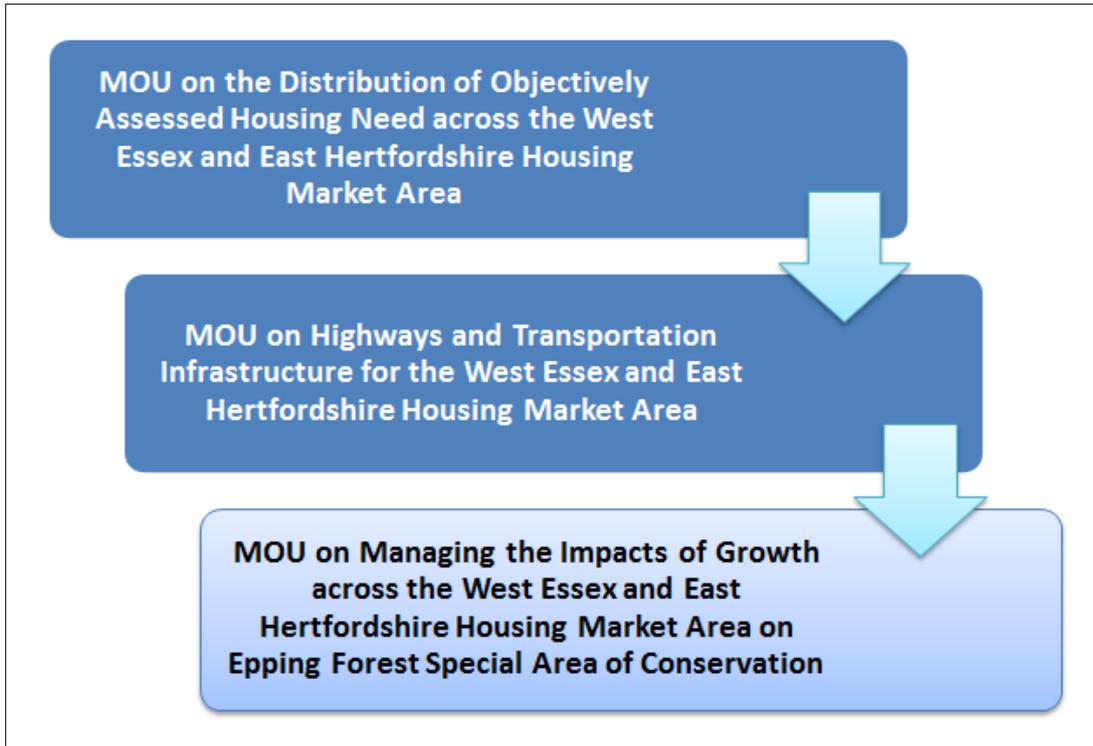
³ 2005 JNCC *Epping Forest Site Details*
<http://jncc.defra.gov.uk/ProtectedSites/SACselection/sac.asp?EUCODE=UK0012720>

⁴ 2015 Natural England *Site Improvement Plan: Epping Forest*
<http://publications.naturalengland.org.uk/publication/6663446854631424>

2. Purpose of this Memorandum of Understanding

2.1 This MoU is one of a group of three related memoranda. The other two deal with the Distribution of Objectively Assessed Need across the West Essex /East Hertfordshire Housing Market Area, and Highways and Transportation Infrastructure, as shown in Figure 1.

Figure 1 - Inter-related Memoranda of Understanding



2.2 Currently air pollution is adversely affecting the Forest with Critical Loads of Nitrogen exceeded across the whole Forest and Critical Levels exceeded across a significant proportion of Forest Land. These exceedances affect the health and resilience of trees and impact on the balance of vegetation and fungal communities. The emerging spatial options for the distribution of growth across the HMA have been subject to an assessment of air quality to determine whether any of those options are likely to have an unacceptable impact on the Epping Forest SAC. The detailed findings of this assessment are subject to a separate report **[insert reference]** as part of the Habitats Regulations Assessment (HRA) process.

2.3 The assessment of air quality has been derived from transport modelling data, which are forecasts based on the best available data. It is therefore necessary to continue to monitor the position, and ensure that where any adverse impacts begin to emerge, that the partners are aware of these, and in a position to respond to the changing evidence. It is therefore necessary to establish an appropriate evidence base and monitoring framework.

2.4 The purpose of this MoU is to ensure that the parties named, work in partnership to fulfil the following requirements:

- i. to collect and analyse data and evidence related to the impacts of proposed development and growth under the Local Plans to provide sufficient and robust evidence on which to base a strategy for the protection of Epping Forest SAC;

- ii. to commit to prepare a joint strategy, based on relevant available data and evidence and to an agreed timetable; and
- iii. that the joint strategy will address both the requirement to avoid, or effectively mitigate, adverse impacts on the integrity of the SAC from Local Plan-led development and the requirement to prevent deterioration of the SAC features.

3. Evidence Gathering to inform a Joint Strategy

- 3.1 Natural England (NE), with the Environment Agency, published a Site Improvement Plan (SIP) for Epping Forest in 2015. This identified seven main pressures on the integrity of the SAC and provides the reference point for the scope of the data and evidence-gathering required under this MoU. Evidence will be collected and analysed to determine whether any of these pressures are worsening over time, and whether the growth planned across the HMA is a causal factor. NE will provide detailed and timely advice on the data required, to ensure it is collected within an appropriate and realistic timescale
- 3.2 Unless modified by further NE advice as a result of any future SIP revisions (including newly-identified pressures), all parties to this MoU agree that the data to be collected will include:
- allocated housing and commercial development sites, including delivery timeframes;
 - highways infrastructure changes;
 - public transport developments;
 - visitor numbers and behaviour, purposes of visits and distances travelled;
 - forecast change in traffic flows, and subsequent impacts on air quality including continued monitoring of the Bell Common Air Quality Management Area; and
 - forecast change to visitor pressures, and any significant positive or negative impacts.
- 3.3 Based on these data, assessments will be made of the ecological impacts that would be the consequence of predicted/likely changes in air pollution and recreational pressures to allow avoidance and mitigation plans to be put in place.
- 3.4 At this stage it is not clear how far visitors to Epping Forest travel, and therefore to what extent the growth in housing across the Housing Market Area may increase visitor and recreational pressures. The costs of gathering the appropriate data to provide a robust evidence base would be borne by the local authorities and prospective developers, as appropriate and proportionate to the development proposals across the HMA in relation to impacts on Epping Forest SAC.
- 3.5 Each party to this MoU agrees to ensure that its approval of the data is provided in a timely manner and is not unreasonably withheld. Any withholding of such approval would require a full written justification setting out clear remedial action that it would be reasonable for the data-gathering parties to take forward to meet their competent authority responsibilities under the Habitat Regulations 2010.

4. Developing a Joint Strategy

- 4.1 The organisations party to this Memorandum (MoU) agree to work together to facilitate the collection of data and evidence as outlined in section 3, in order to develop a Joint Strategy to address potential adverse impacts on the integrity of Epping Forest Special Area of Conservation (SAC), as required under the Habitats Regulations 2010. Epping Forest District Council (EFDC) will act as the coordinating competent authority in relation to Epping Forest SAC as defined by the Habitat Regulations 2010 and as described in the Defra Guidance 2012⁵.
- 4.2 The Joint Strategy will be prepared in accordance with a timetable to be agreed by the partners to this MoU in due course. It is intended this Joint Strategy will be in agreed and published prior to the determination of any of the planning applications on sites around Harlow that are part of The Spatial Option detailed in the “Distribution of OAN across West Essex and East Hertfordshire” MoU. If the Joint Strategy is not in place when planning applications are submitted, applicants will be required to submit the necessary information to ascertain whether any adverse impacts will be caused in Epping Forest, and if necessary any mitigation measures that may be necessary.
- 4.3 The Joint Strategy will incorporate early warning monitoring to ensure that adverse impacts do not occur or are mitigated effectively for the SAC. Should this monitoring identify a deteriorating position, sustainable mitigation strategies for air quality, traffic controls, highways and recreation will be set out in the joint strategy so they can be enacted in a realistic timescale if necessary. Local Plans will include appropriate monitoring policies.
- 4.4 Detailed monitoring frameworks will be prepared to support each of the adopted Local Plans, and some of the required data will be made available on a regular basis through this mechanism. Where additional data is required, the scope of this will be agreed by the parties to this MoU as part of the proposed joint strategy.
- 4.5 Based on the agreed spatial distribution and the associated infrastructure requirements, data would need to be generated by traffic modelling to continue to monitor the likely impacts of vehicle transport on Epping Forest SAC. The traffic models would need to meet the level of resolution required to make robust predictions, to cover all the roads within the Forest boundaries, as identified in the map in **Appendix 2**.
- 4.6 From these traffic data, robust monitoring of air quality and predicted levels and rates of change would be made using the standard assessment methods for the area bounded by Epping Forest SAC (see **Appendix 3**).
- 4.7 The overall health of the Epping Forest SAC is affected by activities outside of the HMA, and therefore the remit of the Joint Strategy may need to be broadened in due course. The overall purpose is to manage Epping Forest such that further deterioration is limited, and positive enhancements are introduced as necessary.
- 4.8 Under the joint strategy further development would be linked to any necessary mitigation such that the identified and required actions would be in place and effective prior to any development being undertaken.
- 4.9 Sources and levels of funding for the different levels of mitigation, if and/or when required, will be agreed and will be put in place under the joint strategy.

⁵ 2012 DEFRA Guidance on competent authority coordination under the Habitats Regulations
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69580/pb13809-habitats-guidance.pdf

- 4.10 The joint strategy would be reviewed at the time of the review of this MoU or earlier should circumstances require it and be agreed by all parties.

5. Signatures

5.1 This Memorandum of Understanding is signed by and duly authorised for and on behalf of:

East Hertfordshire District Council

Name (printed): Councillor Linda Haysey

Signature: **Redaction**

Designation: Leader of the Council

Date: 22nd March 2017

Epping Forest District Council

Name (printed): Councillor John Philip

Signature: **Redaction**

Designation: Planning Policy Portfolio Holder

Date: 22nd March 2017

Harlow District Council

Name (printed): Malcolm Morley OBE

Redaction

Signature:

Designation: Chief Executive of Harlow District Council

Date: 22nd March 2017

Uttlesford District Council

Name (printed): Councillor Susan Barker

Signature: **Redaction**

Designation: Deputy Leader and Portfolio Holder for Environmental Services
Date: 22nd March 2017

Essex County Council

Name (printed): Councillor Kevin Bentley

Signature: **Redaction**

Designation: Deputy Leader and Cabinet Member for Economic Growth and Partnerships

Date: 22nd March 2017

Hertfordshire County Council

Name (printed): Councillor Derrick Ashley

Signature: **Redaction**

Designation: Executive Member for Environment, Planning and Transport

Date: 22nd March 2017

Natural England

Name (printed):

Signature: **Redaction**

Designation: Area Manager (West Anglia)

Date: 22nd March 2017

City of London Corporation

Name (printed): Philip Woodhouse

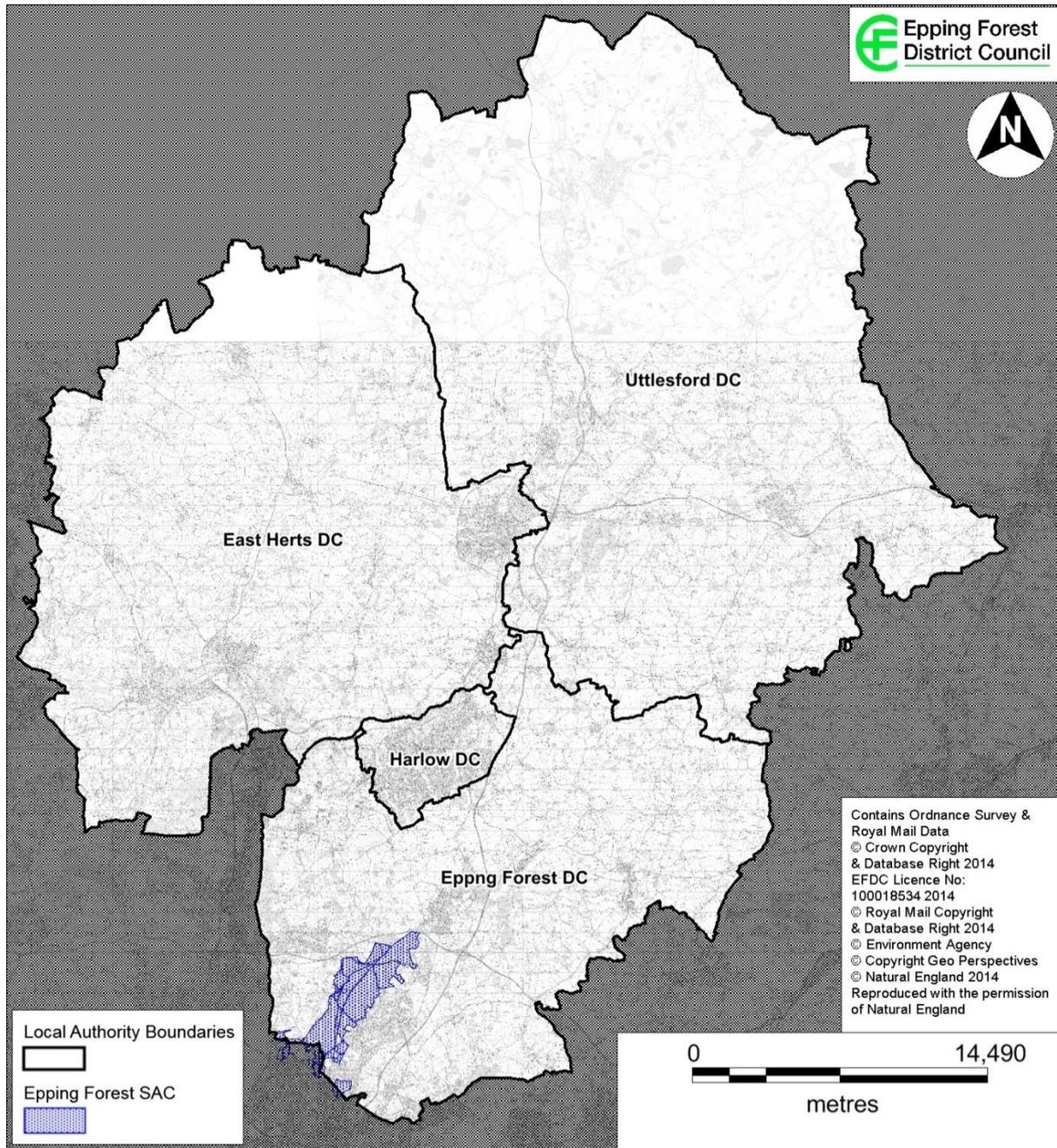
Redaction

Signature:

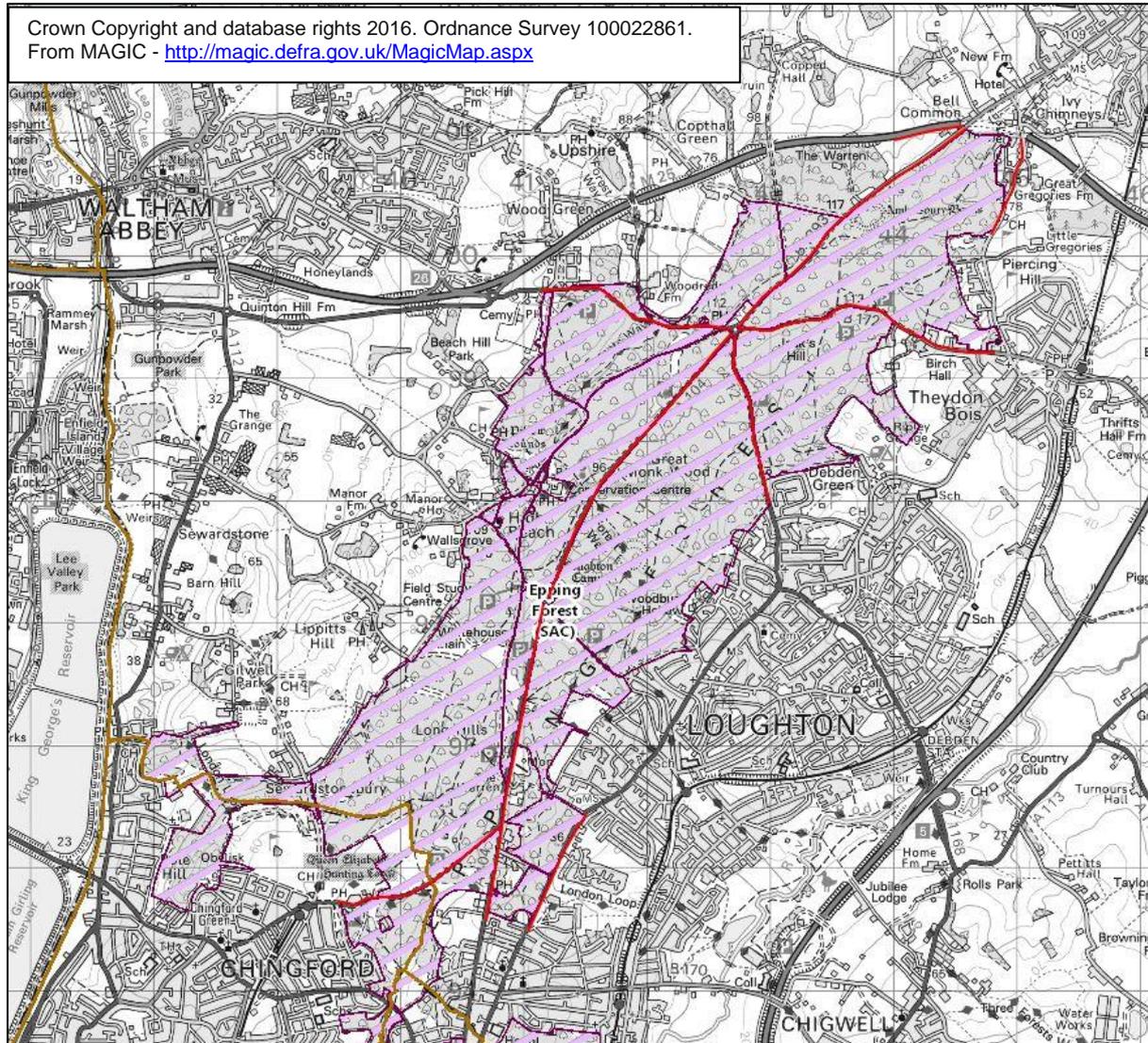
Designation: Chairman

Date: 22nd March 2017

Appendix 1 - The West Essex/East Herts area



Appendix 2 – Road links to be investigated around Epping Forest



Appendix 3 – Air quality predictive modelling method

- A3.1 The predictions of nitrogen deposition and annual mean NO_x concentrations for the proposed works will be based on the assessment methodology presented in Annex F of the Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)⁶ for the assessment of impacts on sensitive designated ecosystems due to highways works. Background data for the predictions for 2033 will be sourced from the Department of Environment, Food and Rural Affairs (Defra) background maps for 2011 projected forward to 2030 (2030 being the most advanced date in the future for which projections are currently available)⁷. Background data for 2030 would be used for the future assessment, with contributions from A-roads within the grid square removed from the background as this contribution was calculated using ADMS-Roads software. Background nitrogen deposition rates will be sourced from the Air Pollution Information System (APIS) website⁸. These rates will be reduced by 2% per year, as set out in HA207/07, to allow for the predicted improvements in background air quality over time as a result of ongoing national initiatives to improve emissions and the expected improvement in vehicle emissions over that period.
- A3.2 Annual mean concentrations of NO_x were calculated at 50m distances back from each road, with the closest distance being the closest point of the designated site to the road. Predictions were made using the latest version of ADMS-Roads using emission rates derived from the Defra Emission Factor Toolkit (version 6.0.2) which utilises traffic data in the form of 24-hour Annual Average Daily Traffic (AADT), detailed vehicle fleet composition and average speed. The end of the Local Plan period has been selected for the various future scenarios as this is the point at which the total emissions due to Local Plan traffic will be at their greatest.

⁶ Design Manual for Roads and Bridges, HA207/07, Highways Agency

⁷ Air Quality Archive Background Maps. Defra, 2013. Available from: <http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html>

⁸ Air Pollution Information System (APIS) www.apis.ac.uk

Memorandum of Understanding

The Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area

May 2018

This is a Memorandum of Understanding between the following
Councils:

East Hertfordshire District Council

Epping Forest District Council

Harlow District Council

Uttlesford District Council

And supported by (non-signatories):

Essex County Council

Hertfordshire County Council



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1. Introduction

- 1.1 This Memorandum of Understanding (MoU) concerns the distribution of the objectively assessed employment needs of the four local planning authorities comprising the West Essex / East Hertfordshire Functional Economic Market Area (FEMA): East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council (Appendix 1 contains more information about the FEMA).
- 1.2 This MoU has been prepared by officers and Members of these four authorities, with assistance from Essex County Council and Hertfordshire County Council. The preparation of the MoU has been overseen by the Co-operation for Sustainable Development Member Board and the Harlow & Gilston Garden Town Board (Appendices 2 and 3 refer to Membership and Terms of Reference of the two Boards).

2. Purpose of this Memorandum of Understanding

- 2.1 This MoU is designed to address the agreed distribution of employment land as defined by the 2017 FEMA report by Hardisty Jones Associates Ltd (HJA). Although the MoU addresses employment need within the West Essex-East Hertfordshire FEMA only, the draft of the MoU, and the evidence underpinning it, were discussed both at the Co-op Member Board and the Co-op Officer Group, which include other relevant authorities.
- 2.2 The purpose of this MoU is to ensure that the West Essex-East Hertfordshire Authorities (supported by Essex County Council and Hertfordshire County Council), work together to fulfil the following requirements:
- 2.3 To plan for meeting in full, the employment needs of the FEMA, as assessed by the West Essex and East Hertfordshire Assessment of Employment Needs Report (October 2017) and ensure the delivery of these i.e
- i) 51,000 jobs
 - ii) 10-24 hectares of employment land for office requirements
 - iii) 68 hectares of employment land for industrial requirements
 - iv) To achieve (i) above through formalising agreement of the employment growth distribution which is set out within the "Assessment of Employment Needs" FEMA report (Hardisty Jones Associates Ltd (HJA) - October 2017) at sustainable locations in the FEMA.
 - v) To shape and deliver the shared Strategic Vision for the London Stansted Cambridge Corridor (LSCC) 'Core Area' which will include a focus on strategic and transformational growth at Harlow, to be developed through the Harlow and Gilston Garden Town Economic Growth Strategy.
 - vi) To continue to engage with one another in detail, and on a continuing basis through the plan-making process, with the intention of ensuring the preparation and delivery of sound local plans of each respective LPA, together with supporting economic growth strategies wherever necessary.
 - vii) To continue to co-operate during the implementation and monitoring of individual local plans in order to ensure their effectiveness, including ensuring flexibility and the ability to adapt and respond to changing circumstances as they emerge.
 - viii) To develop an improved shared understanding around the economic growth of the FEMA, and specific future requirements of the Harlow and Gilston Garden Town, including the commissioning, interpretation and effective application of any future joint evidence work where required.
 - ix) To meet the requirements of the Duty to Cooperate effectively and demonstrably and in particular, to focus on its strategic, cross-boundary considerations and to provide a clear framework for collaborative partnership working.

3. Background

Joint and co-ordinated working in the West Essex / East Hertfordshire FEMA

- 3.1 The National Planning Policy Framework (NPPF) states that “Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities...”and, furthermore, “The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities” (Paragraph 178). It also expects local authorities “...to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for Independent Examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development” (Paragraph 181).
- 3.2 East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils (also referred to in this MoU as the “West Essex / East Hertfordshire Authorities”) have a substantial history of co-ordinated working on strategic planning issues, not least on assessing housing need and planning for future growth. Essex County Council and Hertfordshire County Council have also been involved in cross-boundary working with the local planning authorities for many years, relating to a number of topics, including planning matters.
- 3.3 In addition to this, the local authorities that comprise the FEMA area are all active members of the LSCC and seeking to consider and deliver opportunities for growth arising from the LSCC Growth Commission. Along with the Borough of Broxbourne these authorities are at the ‘core’ of the LSCC, the UK’s Innovation Corridor and will be collectively forming a Growth Board to support growth in this area.

4. Statement of the FEMA Authorities' Agreed Intent to Meet the Employment Need within the FEMA

- 4.1 The West Essex-East Hertfordshire FEMA authorities are committed to working together to deliver jobs growth and the associated levels of employment land provision within the FEMA area. The 2017 FEMA report by HJA sets out the agreed preferred scenario, translating the assessment of employment need into the land requirement for B class uses across the FEMA having regards to the current supply position, local economic strategy, historic take-up and market demand. The agreed preferred scenario has been developed through a consultative approach having consideration of a number of 'policy-on' employment scenarios drawing on the existing evidence, emerging Local Plans, knowledge of nominated planning officers within the FEMA and recent economic and housing growth evidence for the sub-region or smaller geographies within. The FEMA report provides an appropriate basis for the production of Local Plans by establishing an agreed distribution of employment requirements across the FEMA, and individual Districts within the FEMA. However, it should be acknowledged that further work is required to develop the economic strategy for the Harlow and Gilston Garden Town, and this may have implications for the detailed employment strategies for individual Districts which will need to be further considered in the future by the Harlow and Gilston Garden Town Member Board and individual local planning authorities.
- 4.2 The agreed preferred scenario arising from the FEMA report is set out within Tables 1 - 3 below.

Table 1 Preferred Scenario – Job Growth by District 2011-33

District	Jobs
East Herts	10,800
Epping Forest	10,800
Harlow	13,400
Uttlesford	16,000
FEMA	51,000

Table 2 Preferred Scenario - Total Estimated Future Sites and Premises Requirements (sq m GEA unless stated) – FEMA 2016-33

	Office	Industrial
Replacement Provision (A)	83,500	412,200

Net Additional Requirement (B)	77,800	92,800
Gross Requirement (C=A+B)	161,300	505,000
Delivered on Existing Employment Sites (D)	82,400	267,300
Net Requirement (E=C-D)	78,900	237,700
Flexibility Allowance (F)	7,900	23,800
Total Requirement (G=E+F)	86,800	261,500
Average Annual Requirement	5,106	15,382
Total Land Requirement	9 – 22 ha	65 ha
Average Annual Land Requirement	0.5 - 1.3 ha	1.8 ha

Source: HJA (figures may not sum due to rounding).

Table 3 Total Estimated Future Sites and Premises Requirements by District (ha) 2016-33

	Office	Industrial
East Herts	3-7	13
Epping Forest District	2-5	14
Harlow	2-4	16
Uttlesford	2-5	22
Additional Provision to Balance Labour Market	1-2	2
West Essex and East Herts FEMA	10-24	68

Source: HJA (figures may not sum due to rounding).

- 4.3 The agreed preferred jobs growth scenario delivers a level of employment growth below that required to maintain existing commuting rates. To maintain this balance a further 2,100 jobs would be required. This would represent a 4% increase in the level of employment growth within the preferred scenario.
- 4.4 Given that there are some uncertainties associated with forecasting and the long-term nature of Local Plans, such a scale of additional provision over the FEMA area up to 2033 does not represent any significant short-term difficulties. It is likely that

the additional provision may be accommodated through increased job densities and / or windfall development. Regardless, assuming the additional employment is spread across Use Classes in line with the current levels of employment growth, the additional requirement would amount to 6,400 sq m (0.6 – 1.6 hectares) of B1a office provision and 8,700 sq m (2.2 hectares) of industrial provision. The FEMA authorities are committed to working together to ensure that this additional provision is accommodated.

Sustainable Travel

- 4.5 The promotion of sustainable modes of travel will be critical to the success of the Harlow & Gilston Garden Town and the wider Harlow area. This will provide the necessary framework for the accommodation and management of growth, it will connect new communities and help to provide a place in which business will want to invest and deliver additional jobs.
- 4.6 There is both aspiration and a definite need for a transformational change in the levels of use of sustainable modes of transport. The key employment areas will be connected to local communities and the town centre and bus and railway stations through sustainable transport corridors which provide a high quality 'spine' for walking, cycling and rapid public transport systems.

5. Delivering this MoU – Connecting to Wider Strategic Issues

- 5.1 The NPPF states that, 'Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans' (Paragraph 179).
- 5.2 There are, of course, many key issues, other than the spatial distribution of employment land, which are cross-boundary in nature and which the West Essex – East Hertfordshire Authorities are working on together. Other key matters of strategic cross-boundary significance which are being addressed by ongoing joint and co-ordinated work are listed in the table below. This is not an exhaustive list, and the four local authorities will continue to work together to identify and tackle cross-boundary matters going forward.

Housing Issues
Harlow & Gilston Garden Town Housing Strategy
Housing Need (including affordable needs, specialist needs)
Viability
Sustainable building materials and processes
Unmet needs and five year housing land supply – effective housing delivery
Accommodation for Travellers and Travelling Showpeople
Other Economic Issues
Harlow & Gilston Garden Town Economic Growth Strategy
Existing retail offer and future need
Competition between economic centres
Commuting patterns
Highways and Transportation Infrastructure
Delivery of the new J7A of the M11 to enable growth in and around Harlow
Promotion of sustainable modes of transport
Improvements at J7 and J8 of M11
London Stansted Airport growth
Opportunities relating to Crossrail 2 and four-tracking of the West Anglia Main line
Provision of Sustainable Transport Corridors
Central Line issues
Community Infrastructure
Education – primary, secondary, post 16 level (e.g. FE) higher; skills development and training
Open spaces, and sport and recreation facilities
Library provision
Health
Health & well-being strategy – proactive and preventative actions & promoting healthy lifestyles
Consideration of a new site for Princess Alexandra Hospital, possibly a 'health and social care campus'
Provision of primary care, adult social care etc.
Active travel / healthy lifestyles
Environment

Epping Forest Special Area of Conservation (including air quality)
Green Infrastructure
Climate change including flood risk
Food production, including the Lea Valley glasshouse industry
Managing flood risks
Wastewater management
Waste planning and management
Integration of local designations
Urban form of growth areas and their integration with existing urban settlements
Minerals planning
Built Environment
Significant heritage assets e.g. historic towns and Conservation Areas
Green Belt reviews

6. Future Co-operation, Implementation and monitoring

6.1 This section sets out basic tasks and outcomes identified at the time of drafting this MoU; more specific actions will be jointly agreed at a later date as the MoU is reviewed and kept up to date.

Implementation and Monitoring of the tasks outlined in this MoU

6.2 Overall compliance with the MoU will be monitored via a standing item on the agenda of the Co-op Officer Board. If any issues arise they will be referred to the next available Co-op Member Board for discussion and resolution. There will be a formal review of compliance with the MoU on the Co-op Member Board agenda approximately every six months.

6.3 The Harlow & Gilston Garden Town Officer and Member Boards will be working to develop and implement an Economic Growth Strategy which link into both Harlow and London Stansted Cambridge Consortium wider growth strategies.

Implementing and monitoring the tasks outlined by the MoU:			
Task		Implementation by	Monitoring by
1	Meet the assessed employment land need of West Essex-East Hertfordshire FEMA through the most appropriate distribution of development, as set out in the 2017 West Essex and East Hertfordshire Assessment of Employment Needs report.	West Essex – East Herts authorities to allocate land to meet the requirements of their respective administrative area within their Local Plans and continue to cooperate to ensure that employment needs of the FEMA are met in full.	Co-op officer group
2	Continue to engage with each other in detail and on a continuing basis, with the intention of avoiding possible objections being made during the plan-making process.	West Essex-East Hertfordshire authorities to continue to engage regularly via the Co-op Member Board which provides a platform for regular communication for all parties.	Co-op Officer Group to monitor overall engagement from the West Essex-East Hertfordshire authorities, ensuring that information is shared at an early stage for all Local Plan consultations.
3	Continue to cooperate during the implementation and monitoring of individual local plans.	West Essex-East Hertfordshire authorities to discuss and work towards a common set of indicators for monitoring Local Plan progress, and use these together.	West Essex-East Hertfordshire authorities to self-monitor their engagement with each other on this task.
4	Help demonstrate compliance with the Duty to Cooperate to the	West Essex-East Hertfordshire authorities to continue to engage regularly via the Co-op	West Essex-East Hertfordshire authorities to self-monitor their engagement with each

	Planning Inspector's for the respective Planning Inspectors	officer Group and Co-op Member Board, and refer to this MoU, along with all other MoUs at their respective Local Plan Examinations.	other on this task.
5	Consider need for collective / strategic economic growth strategies (such as Garden Town ED strategy / rural growth strategy)	4 LPAs, 2 CCs, LSCC, SELEP, Herts LEP May need some additional research / evidence	Co Op & GT officer groups & boards
6	Consider need for focused / specific economic growth strategies (such as sector growth strategies – e.g. life sciences or Lee Valley food production)	4 LPAs, 2 CCs, LSCC, SELEP, Herts LEP May need some additional research / evidence	Co Op & GT officer groups & boards
7	Monitor actions that may flow from the above 2 tasks	Co Op & GT officer groups / other partners	Co Op & GT officer groups & boards
8	Develop (and deliver) strategic IDP – for Garden Town (and beyond)	4 LPAs, 2 CCs, other infrastructure and service providers	Co Op & GT officer groups & boards

Contingency Planning

- 6.4 Should the West Essex-East Hertfordshire authorities encounter any significant difficulty in delivering the tasks outlined in this MoU, the Authorities commit to working together to find a joint solution which represents the 'best option' for the FEMA. This may include commissioning further technical evidence, or preparing further MoUs, for example, following discussions by the Co-op Officer Group and Co-op Member Board or Garden Town officer group / Member Board. Furthermore, mechanisms for Local Plan review may be considered by any of the Authorities.

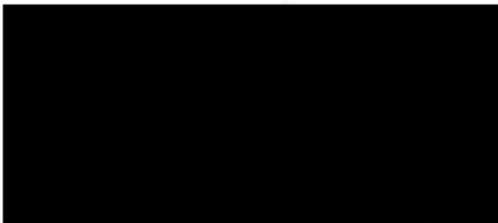
7. Signatures

7.1 This Memorandum of Understanding is signed by and duly authorised for and on behalf of the following authorities.

East Hertfordshire District Council

Name (printed): Councillor Linda Haysey

Signature:



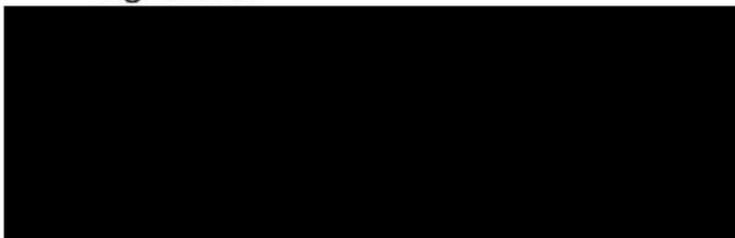
Designation: Leader of East Hertfordshire District Council

Date: 29 June 2018

Epping Forest District Council

Name (printed): Councillor John Philip

Signature:



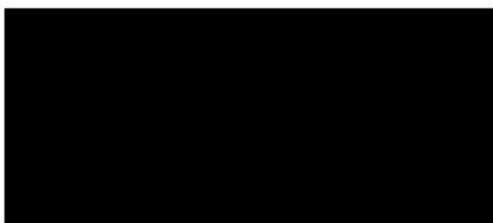
Designation: Portfolio Holder Planning and Governance

Date: 18 May 2018

Harlow District Council

Name (printed): Councillor Danny Purton

Signature:



Designation: Portfolio Holder for Environment

Date: 29 June 2018

Uttlesford District Council

Name (printed): Cllr Susan Barker

Signature:



Designation: Deputy Leader of the Council and Cabinet Member for Environmental Services

Date: 15 May 2018

Appendix 1 the West Essex-East Hertfordshire Functional Economic Market Area

A FEMA reflects the way the economy works; the relationships between where people live and work, the scope of service market areas and catchments. FEMAs are not constrained by administrative boundaries and they do not generally have hard and fast boundaries. The boundaries are porous with many external linkages in terms of travel to work, and catchment areas for other services, as well as business interactions with customers and suppliers.

Ideally a FEMA is defined using data on economic flows e.g. of workers and trade, but there is a limited amount of such data available for the West Essex / East Herts Strategic Housing Market Area (SHMA).

The SHMA area is defined as "...a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work." The West Essex and East Herts SHMA area has been defined by Opinion Research Services (ORS) and comprises East Hertfordshire, Epping Forest, Harlow and Uttlesford Districts.

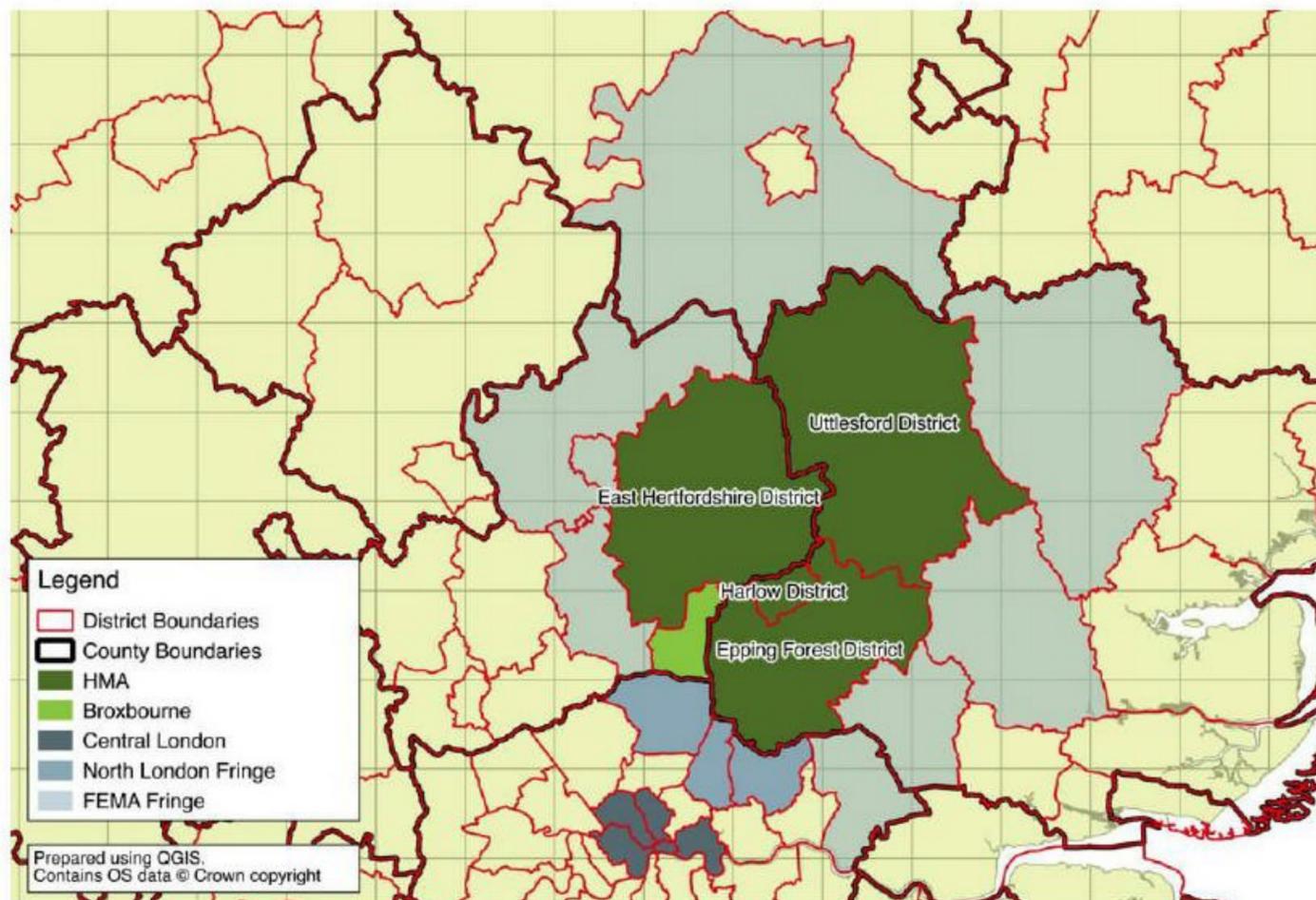
The West Essex / East Hertfordshire SHMA area is not a self-contained FEMA. Whilst the immediate boundaries of the core local authorities are porous, London is a significant economic driver that extends the FEMA beyond the four local authorities' SHMA boundary.

The FEMA could have included Broxbourne; however, the implications for the four core authority areas do not materially change whether or not the Broxbourne area were included. There is also a clear relationship with London – both the nearby north London Boroughs and central London.

The FEMA is shown in the Figure below. This shows a core area and a fringe area. The fringe area comprises all of the immediately adjacent local authorities; and a link to central London is also identified.

The core area covering the four councils formed the basis for the analysis of the FEMA reports, reflecting the close working of the four councils on cross boundary planning matters.

Figure 1.1: Functional Economic Market Area



Appendix 2 - Terms of Reference – Co-operation for Sustainable Development Board

Terms of Reference¹

Co-operation for Sustainable Development Board

June 2015

1. Aims and Objectives

(1) The Co-operation for Sustainable Development Board will support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one local planning area within West Essex, East Herts and the adjoining London Boroughs.²

- 1.1 Local authorities are required by law through the Duty to Cooperate to '*engage constructively, actively and on an on-going basis*' on planning matters that impact on more than one local planning area ('strategic planning matters'). The duty is further amplified in the National Planning Policy Framework (NPPF) which sets out the key 'strategic priorities' that should be addressed jointly³.
- 1.2 The Co-operation for Sustainable Development Board ('the Board') is responsible, on behalf of the core member authorities, for identifying the sustainable development issues that impact on more than one local planning area and agreeing how these should be managed (covering the whole local plan cycle from plan-making, through to delivery and monitoring). This may include evidence gathering. It is an advisory body, and any decisions resulting from its advice remain the responsibility of its constituent councils.
- 1.3 As part of this process, the Board will review cross boundary issues (strategic planning matters) being progressed through emerging local plans and constituent Local Development Frameworks documents as appropriate, and identify issues which are likely to be vulnerable in the legal tests applied under the Duty to Cooperate. In doing so it will consider the plans of local planning authorities outside the core membership where these are likely to impact upon more than one member authority.⁴

¹ These initial terms of reference are expected to be reviewed and updated at the start of each municipal year.

² The core constituent administrative areas are identified as Epping Forest, Harlow and Uttlesford districts, Brentwood Borough and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield.

³ 'Strategic priorities' that local planning authorities have a duty to cooperate on are defined in Paragraph 156 of the National Planning Policy Framework (NPPF).

⁴ Initial identification of cross boundary issues will arise from the NPPF, NPPG and from issues identified at member workshops in 2014, but are expected to change as new issues arise.

(2) The Board will support better integration and alignment of strategic spatial and investment priorities in West Essex, East Herts and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

- 1.4 In order to support the economic growth points within the area and investor confidence, recognising the different attributes and contributions made by the individual member councils, the Board will work jointly with the Local Economic Partnerships identified in Section 4 to understand long term investment priorities and ensure that these are aligned with other public and private sector investment plans.
- 1.5 Initially the Board will seek to understand work that is already underway which is relevant to the Board's strategic planning role.

2. Membership and Accountabilities

- 2.1 The Board provides a forum for local authorities to manage issues that impact on more than one local planning area, developing the necessary evidence base and ensuring wider corporate and other relevant matters are fully taken into account. Although there is a clear emphasis on reaching a common approach on key strategic approaches, the Board is an advisory body only. Any decisions on taking forward outputs from its meetings and work programme (e.g. shared views, policy approaches, evidence or research) will be the responsibility of individual local authorities and the statutory planning process.
- 2.2 Core membership of the Board will comprise representatives from Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield. The GLA will be given Observer status and will be sent minutes of meetings and invited to engage at appropriate times.

Each core member authority will be invited to contribute to the work programme and to consider strategic planning issues that impact on the wider area. Other authorities may be invited to attend on an occasional basis if an issue being considered is likely to have a significant impact on the authority's planning area. Each core member authority will be represented on the Board by the relevant holder of the Planning portfolio or Leader as appropriate, to ensure confidence of authority and commitment to resources.⁵ Officers may attend meetings in support of members.
- 2.3 Regular feedback and briefing to the constituent members' political and corporate leadership is the responsibility of member representatives, and should be used as a way of ensuring wider ownership and support for the Board's work as it progresses. There should also be appropriate liaison between the local authority representatives of both the Board and the South East, Hertfordshire, Greater Cambridge and Greater Peterborough Local Economic Partnerships, and London Enterprise Panel
- 2.4 The Chairman of the Board will be appointed on a rotating basis which should be reviewed annually to ensure fair and equal opportunities amongst the constituent member authorities. Officers of the Chairman's authority will provide administrative and clerical support to meetings.

⁵ Councils will identify their lead member

3. Ways of Working

- 3.1 Refer to Diagram in Annex 1 for details of initial working arrangements. The Board will agree a work programme, including steering and management arrangements for each project, on an annual basis. This could include setting up 'task and finish' groups for specific projects, either reporting directly to the Board or on a shared basis with other bodies. The Board will meet regularly, as required and its meetings will rotate between Harlow, Epping Forest DC and East Herts Councils as the most convenient locations for all. In the interests of transparency, notes of the Board's meetings will be publicly available once they have been agreed.
- 3.2 The Co-operation for Sustainable Development Officer Group will provide either direct advice or support, and/or deliver agreed projects.
- 3.3 Once the work programme has been established, good project management principles should be applied, such as risk management, particularly around political sensitivities and funding, and keeping the work programme under review to ensure that it is meeting the agreed objectives and the identified priorities remain relevant.

4. Key relationships

- 4.1 **South East Local Economic Partnership:** The Board will work closely with SELEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.2 **Hertfordshire LEP:** The Board will work closely with Hertfordshire LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.3 **Greater Cambridge and Greater Peterborough LEP:** The Board will work closely with GCGP LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.4 **London Enterprise Panel** – this acts as the Local Economic Partnership for London.
- 4.5 **East Herts West Essex Border Liaison Group:** this is an established forum for members from many of the core Board authorities to come together and discuss issues of common interest several times a year. Its terms of reference specifically include reference to the duty to co-operate. Its wide membership (in terms of the number of elected members invited from the constituent authorities) means that it provides a useful forum for the Board to communicate on its activities, and receive updates on issues. The Chairman of the Board or an agreed member should report to each meeting of the EHWEBLG.

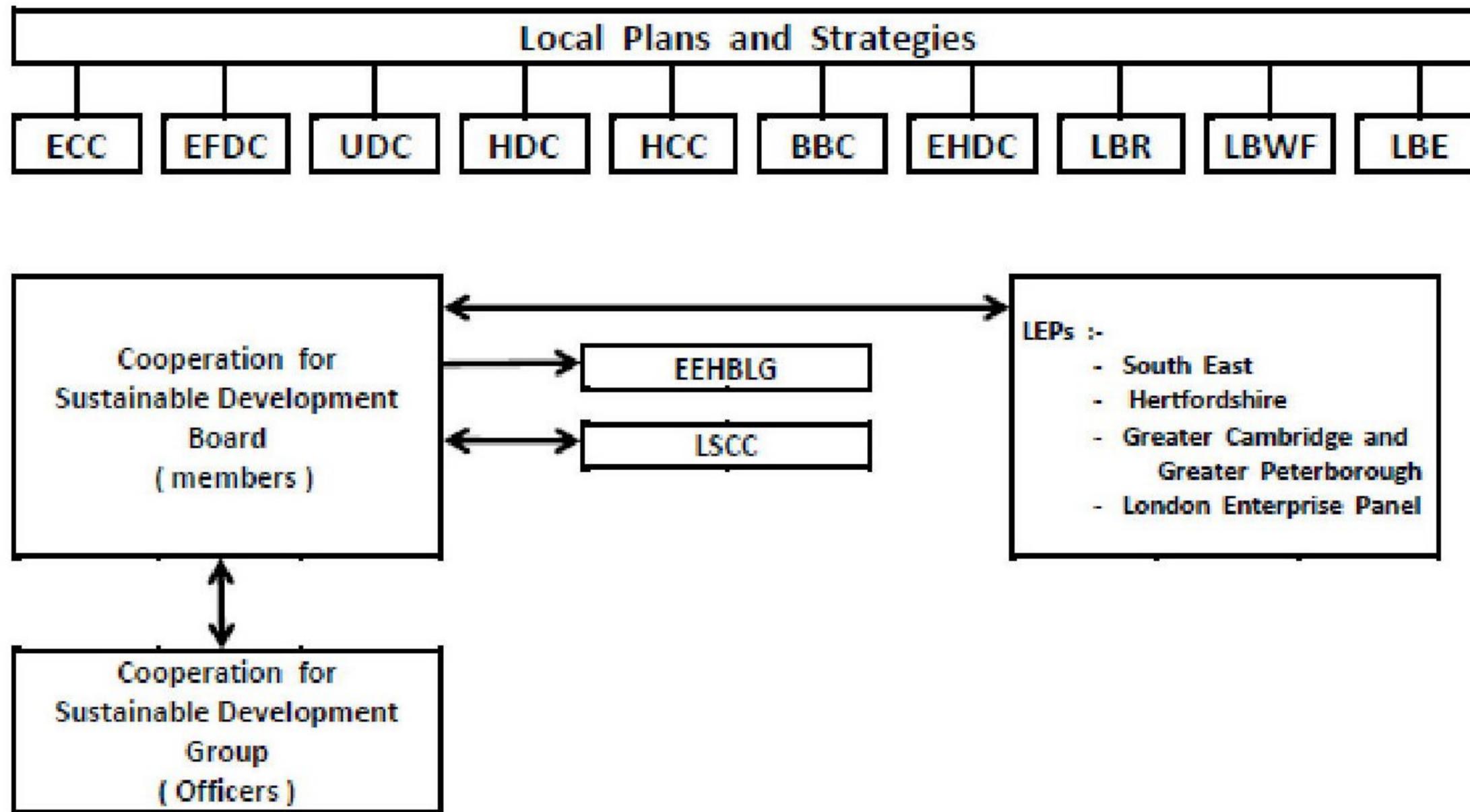
- 4.6 **London Stansted Cambridge Consortium:** This is an established partnership of public and private sector organisations, including councils, which covers the area from Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10 and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge. **The principal objective of the consortium is to drive economic development and enhance quality of life in the north London – Stansted – Cambridge corridor. This means not only driving job growth through productivity and investment, but more importantly increasing economic activity, by ensuring local communities access employment opportunities.**
- 4.7 **Other Key Partners:** A number of key bodies and organisations will be necessary to support the work of the Board either through direct support/advice or through joint projects. Most of these will be subject to the legal requirements of the 'duty to cooperate' and may well already be involved in the other partnerships mentioned above. Key bodies include the Lee Valley Regional Park, the Corporation of the City of London (responsible for Epping Forest), the Environment Agency, Highways Agency, and Homes and Communities Agency. Private sector infrastructure providers, particularly utility companies, will also be key partners particularly in terms of ensuring alignment between investment plans and priorities.

5 Technical Support

- 5.1 The Board will be supported by an officer group, known as the Co-operation for Sustainable Development Group, with representatives from each of the constituent authorities. The group will advise the Board on technical issues, and act as a steering group for any identified project, establishing suitable technical support and project management arrangements for each. This may involve the use of 'task and finish' groups and could include the use of external expertise e.g. from key statutory bodies identified in Section 4 above or the use of consultants. The group will therefore also be responsible for any necessary joint procurement arrangements.
- 5.2 A representative of the officer group (the chairman or a suitable substitute) will attend the Board meetings and provide regular progress updates on the work programme to the Chairman.

6. Review

- 6.1 These are initial terms of reference, and will be formally reviewed before May 2015. It is important to keep arrangements flexible to respond to changes in planning policy, priorities and work programmes and to move forward from plan policy development stages to implementation. It is therefore anticipated that the terms of reference will continue to be reviewed annually.



Appendix 3 - Harlow & Gilston Garden Town Governance Arrangements

Harlow and Gilston Garden Town – Project Planning, Management and Delivery Support Update

Report to the Cooperation for Sustainable Development Board 26 June 2017

Recommendations/Decisions Required:

- (1) That the proposed Harlow and Gilston Garden Town interim governance arrangements are endorsed and**
- (2) That other update matters are noted.**

Executive Summary:

This report seeks:

- (a) To update members of the progress of the Harlow and Gilston Garden Town project planning, programme management and project delivery support activities undertaken by Arup since their appointment in June 2017.**

Arup has provided recommendations (see Section 2) on the setting up of a Garden Town Member Board, a Garden Town Officer Steering Group and a Garden Town Project Team. The Member and Officer Boards would be ‘sub-groups’ to the existing Co-Operation for Sustainable Development Boards and would meet on a monthly basis. The existing Co-Operation for Sustainable Development Boards would then move to meet on a two-monthly cycle. A Garden Town Developer Forum is also proposed.

Other updates to note are also set out in relation to:

- Project programming;**
- The preparation of a Sustainable Transport Corridor Concept and Feasibility Study Brief and**
- Establishing a Design Review Panel**

1. Introduction

- 1.1 As Members will be aware, on 2 January 2017 the Government announced its support for the Expression of Interest submitted to the Government's locally – led Garden Towns prospectus on behalf of East Herts Council, Epping Forest District Council (EFDC) and Harlow Council. Epping Forest District is acting as lead authority.
- 1.2 The Harlow and Gilston Garden Town Project recently tendered for consultancy support to assist in putting in place suitable and appropriate governance and project management arrangements for the Councils to work together efficiently and effectively and to continue to build relationships with external organisations, including infrastructure providers, and local communities.
- 1.3 Arup was appointed in June 2017 to take forward these workstreams and an Inception Meeting was held with the Garden Town Officer Steering Group on 07 June 2017.
- 1.4 The key priorities identified to progress were:
 - a) Development of Interim Governance Arrangements
 - b) Preparation of a project programme
 - c) Preparation of a Sustainable Transport Corridor Concept and Feasibility Study Brief
 - d) Establishing a Design Review Panel
- 1.5 This report provides an update to Members on progress on the above workstreams and seeks approval to move forwards with the proposed interim governance arrangements.

2. Interim Governance Arrangements

- 2.1 Arup is tasked with identifying and considering potential models for the delivery of strategic growth around Harlow drawing on knowledge and experience of recent best practice examples. Arup is drawing from recent experiences in establishing similar joint working and governance arrangements elsewhere in order to deliver cross-boundary strategic growth and is having regard to the outcomes and proposals put forward by ATLAS at the Joint Officer Workshop held on 08 February 2017.

2.2 An initial assessment by Arup of various case study examples of existing or emerging Garden Towns has shown a number of common threads:

- a) **Three tiered approach to governance:** the majority of existing/emerging Garden Towns have three levels of governance – a member advisory board, an officers steering group and a project team led by representatives of the Council or a specially appointed team. In some cases, the member board has decision making powers, but in the majority of cases it is the Executive Board which should act as decision maker.
- b) **Stakeholder engagement and involvement:** the case studies have shown the importance of integrating inputs from the range of stakeholders which have a part to play in development of a Garden Town through community groups, developer forums, and integrated approach with infrastructure providers and others etc.
- c) **Utilising existing networks:** many emerging Garden Towns propose to use existing bodies initially before expanding or developing these bodies and groups to meet the needs of the Garden Town. This provides a more efficient approach than establishing wholly new bodies and needing to find availability for these.

2.3 Building on the above, and an understanding of existing governance arrangement within and between the three districts of EFDC, EHDC and Harlow, a governance structure is proposed below. It is recognised that the proposed arrangements may flex as the Project progresses.

2.4 Mirroring the common three tiered approach to governance, it is proposed that the Harlow and Gilston Garden Town would be governed by:

- a) The Garden Town Member Board – Acting as a Sub-Group to the principal Co-Operation for Sustainable Development Member Group it is proposed that the Garden Town Member Board would meet monthly with the principal Board meeting every other month immediately after the Garden Town Member Board meeting
- b) The Garden Town Officer Steering Group - Acting as a Sub-Group to the principal Co-Operation for Sustainable Development Officer Group it is proposed that the Garden Town Officer Steering Group would meet monthly (or more often as required) with the principal Co-Op Officer continuing to also meet monthly given, amongst other matters, the Local Plan progress of the three District Councils
- c) The Garden Town Project Team – this team would be responsible for setting, managing and delivering the workstreams required to facilitate the development of Harlow and Gilston Garden Town.

2.5 Sitting alongside and underneath these groups would be a series of forums and groups who will feed into the development and growth of the Garden Town, as follows:

- a) The Garden Town Developer Forum – the existing EFDC Local Plan Developer Forum for strategic sites around Harlow was established (together with its Terms of Reference) alongside the progression of the Epping Forest District Council Local Plan, to provide a basis for ongoing discussions with relevant landowners, site promoters and stakeholders. (Note there is a separate forum for other sites in the rest of the District). The Developer Forum provides a basis for the long term planning and implementation of sites identified for allocation in the Local Plan and provides a basis for the coordination and management of Strategic Masterplans and planning proposals associated with the sites. The Forum could also usefully provide the appropriate mechanism to discuss the spatial visioning/design charter and sustainable transport corridor workstreams with these stakeholders.

The core membership of the existing Developer Forum comprises

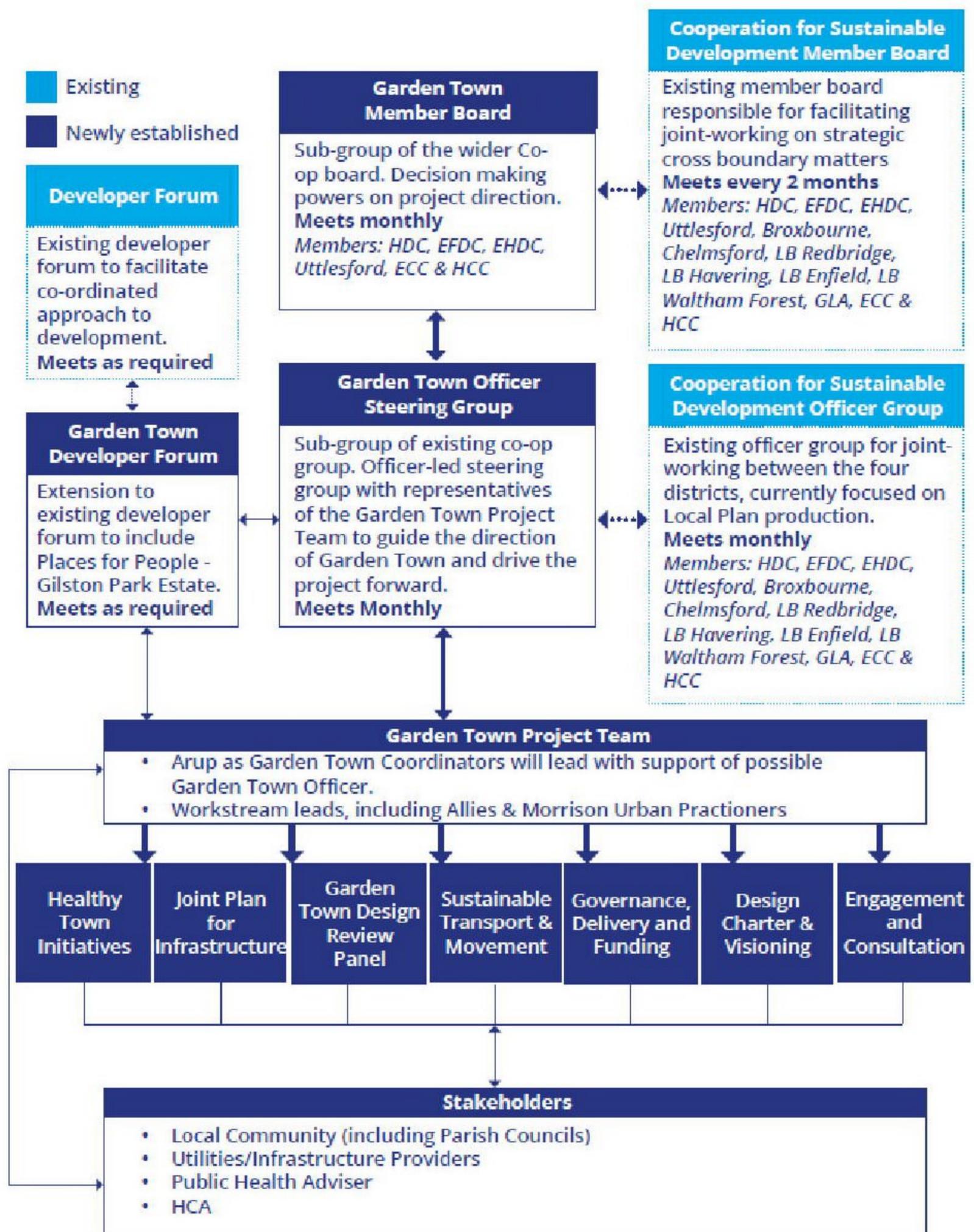
- Promoters / landowners / planning agents of strategic sites around Harlow
- EFDC Officers – including Planning Policy, Development Management, Conservation, Housing, Environmental Health and others as required
- Essex County Council Officers – including Planning, Transport, Education and others as required
- Harlow District Council Officers and;
- East Herts District Council Officers

In addition to EFDC, as noted above, officers from East Herts and Harlow District Councils also attend so to, in part, ensure a basis for the consideration and consistent implementation of utilities and statutory providers' approaches across the Districts.

It is recommended that representatives from 'Places for People' (re: Gilston Park Estate in East Herts) be invited to the existing EFDC Developer Forum (note: the East Harlow site is already represented as the same promoter/landowner already attends for that part of the site within EFDC) and to attend meetings as appropriate to ensure joint planning of the Garden Town

- b) Workstreams of the Garden Town Project Team (with associated consultant leads)
- c) Stakeholder fora and/or groups

2.6 Figure 1, below shows the interaction between these groups. The remainder of this section summarises the role of each group, and their interactions with each other in further detail.



Garden Town Co-op Member Board

- 2.7 The existing Co-operation for Sustainable Development board (the Co-op board), is a joint member body established in 2014 with elected members from EFDC, EHDC, HDC, Uttlesford District Council, Brentwood Borough Council, Broxbourne Council, Chelmsford City Council, LB Redbridge, LB Havering, Enfield Council, Waltham Forest Council and the GLA. Other key bodies and organisations necessary to support the work of the Board, such as Lee Valley Regional Park Authority, City of London (Conservators) and Natural England, the Environment Agency, Highways England, either through direct support/advice or through joint projects are also involved. This body currently has responsibility for administering and facilitating joint-working on strategic cross boundary matters affecting the area. The Chair of the existing Co-op board is rotated, and the Leader of East Herts District Council is the current chair. From July 2017 the Board will be Chaired by Harlow District Council.
- 2.8 It is proposed that a sub-group of the Co-op board be established to consider issues specifically associated with the Harlow and Gilston Garden Town - the Garden Town Member Board. It is recommended that this should consist of members from East Herts, Harlow, EFDC, Essex County Council, Herts County Council and Uttlesford (noting that Uttlesford would attend in an 'observation non-voting' capacity and that whilst Uttlesford do not have sites in the Garden Town much of the work that will be undertaken relates to Uttlesford e.g transport, FEMA, SHMA etc). The Garden Town Co-op Board would meet monthly, and as far as possible on the same dates as Co-op Board meetings, to ensure efficiency and maximise availability of members. On the month that the main Coop Board meetings also take place it is recommended that the Garden Town meeting takes place first for an hour and is then followed by the main meeting.
- 2.9 The Garden Town Co-op Board will be responsible for ensuring co-operation between the three Districts and two Counties (with Uttlesford) on the growth of Harlow and Gilston Garden Town. In addition, it is envisaged that the body would have decision making powers over the Garden Town project, allowing them to provide strategic project direction, guided by the Garden Town Officer Steering Group and Project Team (see below).

Garden Town Officer Steering Group

- 2.10 In line with the existing Co-op board, an Officer working group also exists, chaired by the Chief Executive of Epping Forest District Council. This working group deals largely with topics relating to the preparation of the Councils' respective new Local Plans, ensuring that cross boundary strategic planning matters are discussed and prepares papers for the Coop Board meeting.
- 2.11 It is proposed that a new, Garden Town Officer Steering Group is established to provide Officer direction for the Harlow and Gilston Garden Town. This would include Senior Officer representatives from each of the three Districts and two Counties (with Uttlesford to have a watching brief), as well as a representative of the Garden Town project Team (see below). The Garden Town Steering Group would co-ordinate its programme to ensure meetings take place prior to the Garden Town Co-op Board to allow for the outcomes to feed through efficiently to the elected members and decision makers.
- 2.12 The Garden Town Officer Steering Group would have responsibility for guiding the direction of the Garden Town and driving the project forward. In co-operation with the Project Team, they would guide the objectives and vision for the Garden Town; prepare, agree and coordinate the Garden Town work programme; review the outcomes of the individual workstreams; and manage and review positive engagement with developers and communities, including pre-application engagement on strategic planning applications.

Garden Town project Team

- 2.13 The Garden Town Project team would be responsible for setting, managing and delivering the workstreams required to facilitate the development of Harlow and Gilston Garden Town. This team is currently led by Paul Jarvis supported by a team from Ove Arup and Partners. The workstreams shown in the Figure one reflect the priority areas identified at the Joint Officer Workshop held in February 2017 - it is recognised that other important themes such as strategic infrastructure (physical, social and community), education and green infrastructure will also be progressed in parallel as the Project moves forward.

Garden Town Developer Forum

2.14 As set out in paragraph 2.5 above, an existing EFDC Local Plan Developer Forum is already established for the purposes of Local Plan making, which crosses all three districts and includes 'strategic sites' within its remit for discussion. The proposal is to utilise this forum, and to develop a sub-group – to include 'Places for People' - Gilston Park Estate - for discussion on the Harlow and Gilston Garden Town 'strategic sites'. This would include representatives of developers and other delivery partners for the Garden Town, including utilities and infrastructure providers, and County Council's (especially education and health).

2.15 It will also be necessary, as the project develops, to establish strong one-on-one relationships with developers and other delivery partners to ensure they and the Garden Town are working together towards common goals. These individual meetings are to commence shortly.

Stakeholder Groups

2.16 As identified from a case study review, the engagement of the wide range of relevant stakeholders will be central to successful delivery of the Harlow and Gilston Garden Town.

2.17 The range of stakeholders, includes the following:

- a) Local Community
- b) Parish Councils
- c) HCA

2.18 Arup is undertaking a wider stakeholder review with the Garden Town District Councils to ensure that any Garden Town-focused stakeholder engagement does not add to further 'consultation fatigue'. The range of stakeholders is evidently much wider than the non-exhaustive list noted above and it will be important to ensure that any Garden Town consultation where possible feeds into existing Local Plan and Neighbourhood Planning exercises.

2.19 It is not proposed that a separate community forum is established, but rather that a programme of community and stakeholder engagement is established to ensure the

community feel included in the development of the Garden Town. This may include presentations to Parish Councils, liaison with Neighbourhood Plan groups, drop-in sessions for local residents and the setting up of a website, and possibly newsletter and email list. Community engagement will be particularly important at the early stage for the Spatial Vision and Design Charter workstream, and as the strategic Masterplans are developed.

3. Project Programme

3.1 Having regard to the various project workstreams, Arup has prepared an interim project programme. This is a live document that will be regularly updated with progress report to each Co-operation for Sustainable Development Garden Town Member and Officer Group meetings.

3.2 A summary of key dates / workstreams is as follows:

a) *Interim Governance and Delivery Structure:*

- i. Proposal for Initial Sub-Group arrangement(s) presented to Board **26 June**
- ii. Subject to Member approval, the preparation of Terms of Reference and detail on meeting arrangements to be completed by **07 July**
- iii. Harlow and Gilston Garden Town Officer comments and amendments by **12 July**
- iv. Reporting to Officer Sub-Group **20 July**
- v. Reporting to Member Sub-Group **31 July**

b) *Establishing Quality Review Panel:*

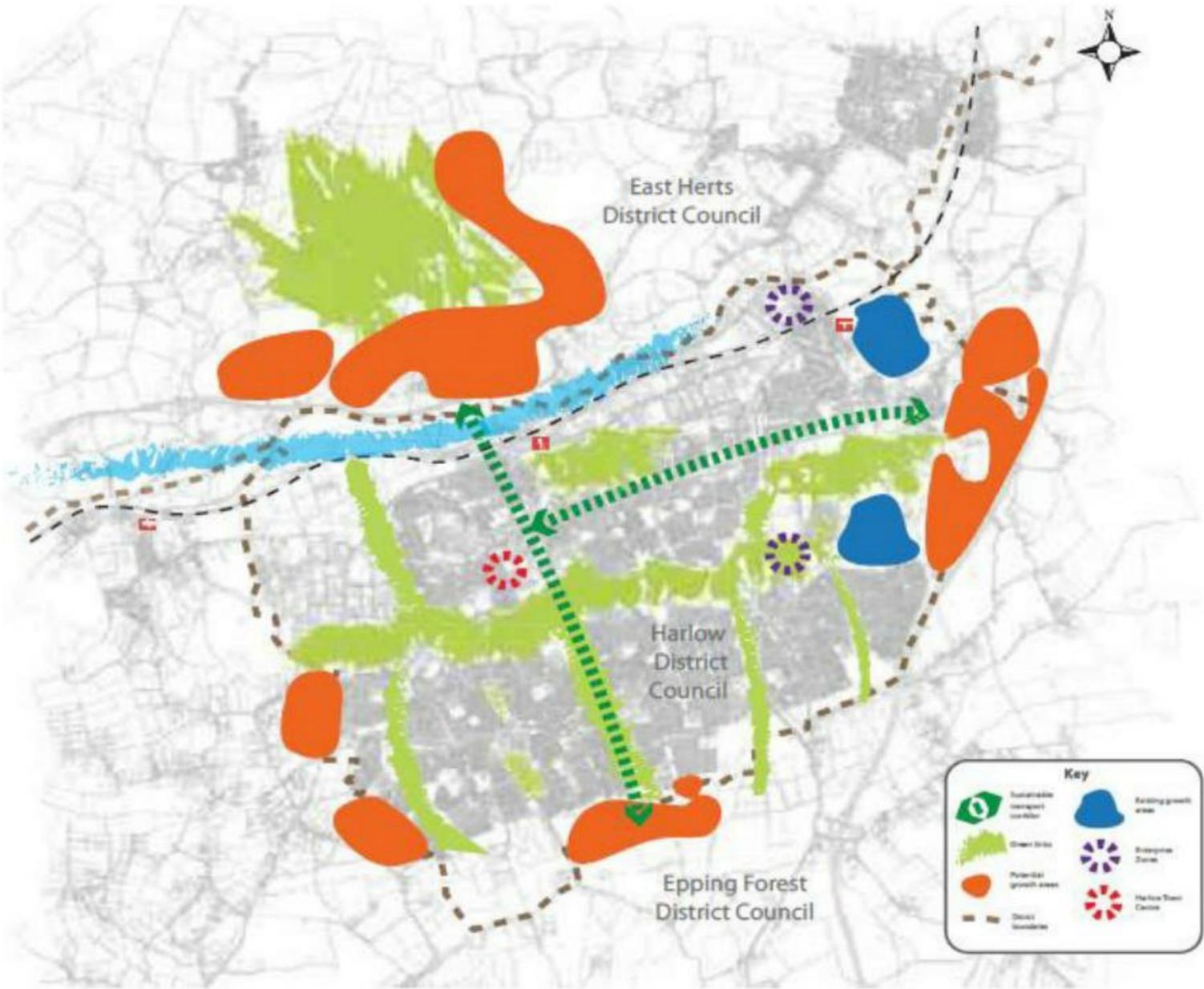
- i. Briefing Note to Officer Sub-Group **20 July**
- ii. Reporting to Member Sub-Group **31 July**
- iii. Advertise for supplier to manage panel process – complete by **14 August**
- iv. Interviews by **22 August**

- v. Appointment by **29 August**
 - vi. Further report to Member Sub-Group **16 October**
- c) *Brief for Sustainable Transport Corridor*
- i. Update for the Co-Op for Sustainable Development Member Group **26 June**
 - ii. Tender period complete **28 July**
 - iii. Interviews by **07 August**
 - iv. Appointment **10 August**
- d) *Website Templating*
- i. Officer Sub-Group review of briefing note complete by **10 August**
 - ii. Tender period for suppliers complete by **26 September**
 - iii. Appointment **by 31 October**

4. Preparation of a Sustainable Transport Corridor Concept and Feasibility Study Brief

- 4.1 All three Districts consider transport, and sustainable transport measures (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 create sustainable transport corridors as part of managing overall travel demand and linking new communities and Enterprise Zones through a choice of transport modes.
- 4.2 As part of this vision, the Councils recognise it is essential to provide a robust and deliverable policy framework to promote and deliver a step change in sustainable travel, and to manage overall travel demand. For example, early delivery of a second River Stort crossing is essential to facilitate a north-south sustainable travel corridor, significant modal shift and wider network benefits to Harlow and Gilston Garden Town.
- 4.3 Two indicative Sustainable Transport Corridors are already identified in emerging Local Plans – these run North-South and East-West through Harlow to provide the

connectivity required to support growth of the Garden Town. It is expected that these will form the starting point for the consideration of sustainable transport in the area – see the indicative pan below:



- 4.4 Arup is preparing a brief for the undertaking of a Sustainable Transport Corridor Concept and Feasibility Study for the Harlow and Gilston Garden Town and is liaising with Allies and Morrison Urban Practitioners to ensure the Spatial Vision and Design Charter workstream ties in with this Brief. The purpose is to provide recommendations for an integrated package of sustainable travel infrastructure improvements (and traffic management) in and around the Harlow and Gilston Garden Town area.

- 4.5 The study outputs should help to inform an integrated and accessible transport strategy, in line with Garden City principles, with walking, cycling and public transport designed to be the most attractive forms of local transport. It is envisaged that the study will also help to unlock additional transport capacity, which would otherwise prevent economic growth and development. The development of sustainable

transport corridors must also be underpinned by consideration of the strategic network of green wedges and green fingers which are set out in Gibberd's original vision for Harlow.

5. Establishing a Design Review Panel

- 5.1 Arup is also tasked with a review of options for the establishment of a Quality Review Panel with the objective of embedding high quality design into emerging proposals in a consistent way across the Garden Town. If, as expected, the Design Review Panel process is successful in raising the quality of design in the planning process and secures development of the highest quality then it is envisaged that the Harlow and Gilston Garden Town model could be adopted across the three Districts as a tool for early engagement as part of the planning process masterplanning and pre-application stages. By engaging at an early stage, design teams and applicants can help to reduce the uncertainty and therefore risk at the decision making stage.
- 5.2 In order to ensure 'placemaking' and a consistent design message across the Garden Town, Arup will be coordinating the Quality Review Panel workstream alongside the preparation of the Spatial Vision and Design Charter that is being progressed by Allies and Morrison Urban Practitioners. Design panels are already well established across England at national, regional and local levels and provide an independent, expert assessment of architectural proposals and are now an essential part of the planning process.
- 5.3 Arup is reviewing a number of models and will be reporting on their recommendations in July 2017.

Terms of Reference¹

Co-operation for Sustainable Development Board

October 2014

1. Aims and Objectives

(1) The Co-operation for Sustainable Development Board will support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one local planning area within West Essex, East Herts and the adjoining London Boroughs.²

- 1.1 Local authorities are required by law through the Duty to Cooperate to '*engage constructively, actively and on an on-going basis*' on planning matters that impact on more than one local planning area ('strategic planning matters'). The duty is further amplified in the National Planning Policy Framework (NPPF) which sets out the key 'strategic priorities' that should be addressed jointly³.
- 1.2 The Co-operation for Sustainable Development Board ('the Board') is responsible, on behalf of the core member authorities, for identifying the sustainable development issues that impact on more than one local planning area and agreeing how these should be managed (covering the whole local plan cycle from plan-making, through to delivery and monitoring). This may include evidence gathering. It is an advisory body, and any decisions resulting from its advice remain the responsibility of its constituent councils.
- 1.3 As part of this process, the Board will review cross boundary issues (strategic planning matters) being progressed through emerging local plans and constituent Local Development Frameworks documents as appropriate, and identify issues which are likely to be vulnerable in the legal tests applied under the Duty to Cooperate. In doing so it will consider the plans of local planning authorities outside the core membership where these are likely to impact upon more than one member authority.⁴

¹ These initial terms of reference are expected to be reviewed and updated at the start of each municipal year.

² The core constituent administrative areas are identified as Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield.

³ 'Strategic priorities' that local planning authorities have a duty to cooperate on are defined in Paragraph 156 of the National Planning Policy Framework (NPPF).

⁴ Initial identification of cross boundary issues will arise from the NPPF, NPPG and from issues identified at member workshops in 2014, but are expected to change as new issues arise.

(2) The Board will support better integration and alignment of strategic spatial and investment priorities in West Essex, East Herts and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

- 1.4 In order to support the economic growth points within the area and investor confidence, recognising the different attributes and contributions made by the individual member councils, the Board will work jointly with the Local Economic Partnerships identified in Section 4 to understand long term investment priorities and ensure that these are aligned with other public and private sector investment plans.
- 1.5 Initially the Board will seek to understand work that is already underway which is relevant to the Board's strategic planning role.

2. Membership and Accountabilities

- 2.1 The Board provides a forum for local authorities to manage issues that impact on more than one local planning area, developing the necessary evidence base and ensuring wider corporate and other relevant matters are fully taken into account. Although there is a clear emphasis on reaching a common approach on key strategic approaches, the Board is an advisory body only. Any decisions on taking forward outputs from its meetings and work programme (e.g. shared views, policy approaches, evidence or research) will be the responsibility of individual local authorities and the statutory planning process.
- 2.2 Core membership of the Board will comprise representatives from Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield. The GLA will be given Observer status and will be sent minutes of meetings and invited to engage at appropriate times.

Each core member authority will be invited to contribute to the work programme and to consider strategic planning issues that impact on the wider area. Other authorities may be invited to attend on an occasional basis if an issue being considered is likely to have a significant impact on the authority's planning area. Each core member authority will be represented on the Board by the relevant holder of the Planning portfolio or Leader as appropriate, to ensure confidence of authority and commitment to resources.⁵ Officers may attend meetings in support of members.
- 2.3 Regular feedback and briefing to the constituent members' political and corporate leadership is the responsibility of member representatives, and should be used as a way of ensuring wider ownership and support for the Board's work as it progresses. There should also be appropriate liaison between the local authority representatives of both the Board and the South East, Hertfordshire, Greater Cambridge and Greater Peterborough Local Economic Partnerships, and London Enterprise Panel

⁵ Councils will identify their lead member

- 2.4 The Chairman of the Board will be appointed on a rotating basis which should be reviewed at least annually to ensure fair and equal opportunities amongst the constituent member authorities. Officers of the Chairman's authority will provide administrative and clerical support to meetings.

3. Ways of Working

- 3.1 Refer to Diagram in Annex 1 for details of initial working arrangements. The Board will agree a work programme, including steering and management arrangements for each project, on an annual basis. This could include setting up 'task and finish' groups for specific projects, either reporting directly to the Board or on a shared basis with other bodies. The Board will meet regularly, as required and its meetings will rotate between Harlow, Epping Forest DC and East Herts Councils as the most convenient locations for all. In the interests of transparency, notes of the Board's meetings will be publicly available once they have been agreed.
- 3.2 The Co-operation for Sustainable Development Officer Group will provide either direct advice or support, and/or deliver agreed projects.
- 3.3 Once the work programme has been established, good project management principles should be applied, such as risk management, particularly around political sensitivities and funding, and keeping the work programme under review to ensure that it is meeting the agreed objectives and the identified priorities remain relevant.

4. Key relationships

- 4.1 **South East Local Economic Partnership:** The Board will work closely with SELEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.2 **Hertfordshire LEP:** The Board will work closely with Hertfordshire LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.3 **Greater Cambridge and Greater Peterborough LEP:** The Board will work closely with GCGP LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.4 **London Enterprise Panel** – this acts as the Local Economic Partnership for London.
- 4.5 **East Herts West Essex Border Liaison Group:** this is an established forum for members from many of the core Board authorities to come together and

discuss issues of common interest several times a year. Its terms of reference specifically include reference to the duty to co-operate. Its wide membership (in terms of the number of elected members invited from the constituent authorities) means that it provides a useful forum for the Board to communicate on its activities, and receive updates on issues. The Chairman of the Board or an agreed member should report to each meeting of the EHWEBLG.

- 4.6 **London Stansted Cambridge Consortium:** this is an established partnership of public and private sector organisations, including councils, which covers the area from Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10 and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge. The principal objective of the consortium is to drive economic development and enhance quality of life in the north London – Stansted – Cambridge corridor. This means not only driving job growth through productivity and investment, but more importantly increasing economic activity, by ensuring local communities access employment opportunities.
- 4.7 **Other Key Partners:** A number of key bodies and organisations will be necessary to support the work of the Board either through direct support/advice or through joint projects. Most of these will be subject to the legal requirements of the ‘duty to cooperate’ and may well already be involved in the other partnerships mentioned above. Key bodies include the Lee Valley Regional Park, the Corporation of the City of London (responsible for Epping Forest), the Environment Agency, Highways Agency, and Homes and Communities Agency. Private sector infrastructure providers, particularly utility companies, will also be key partners particularly in terms of ensuring alignment between investment plans and priorities.

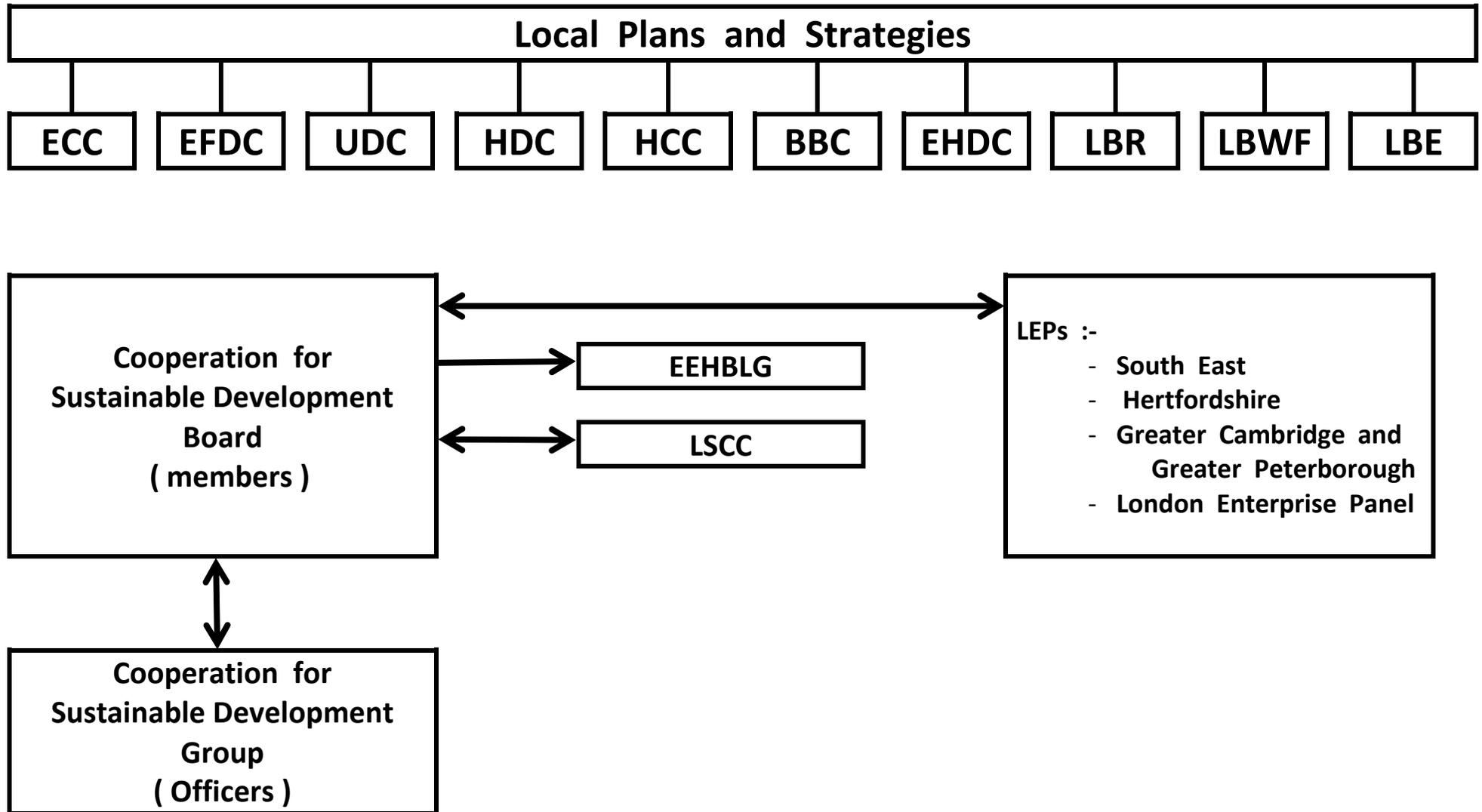
5 Technical Support

- 5.1 The Board will be supported by an officer group, known as the Co-operation for Sustainable Development Group, with representatives from each of the constituent authorities. The group will advise the Board on technical issues, and act as a steering group for any identified project, establishing suitable technical support and project management arrangements for each. This may involve the use of ‘task and finish’ groups and could include the use of external expertise e.g. from key statutory bodies identified in Section 4 above or the use of consultants. The group will therefore also be responsible for any necessary joint procurement arrangements.
- 5.2 A representative of the officer group (the chairman or a suitable substitute) will attend the Board meetings and provide regular progress updates on the work programme to the Chairman.

6. Review

- 6.1 These are initial terms of reference, and will be formally reviewed before May 2015. It is important to keep arrangements flexible to respond to changes in planning policy, priorities and work programmes and to move forward from plan policy development stages to implementation. It is therefore anticipated that the terms of reference will continue to be reviewed annually.

ANNEX 1



Appendix F: Cooperation for Sustainable Development Board – List of Meetings and key matters considered:

- [27 January 2015 - Key matters: Further Alterations to London Plan, SHMA](#)
- [16 March 2015 - Key matters: SHMA update](#)
- [3 June 2015 - Key matters: ToR, SHMA update, Economic matters](#)
- [22 September 2015 - Key matters: SHMA and joint economic work, LSCC](#)
- [26 October 2015 - Key matters: Joint strategic growth options, Junction 7a funding](#)
- [4 December 2015 - Key matters: Highway issues considered, Crossrail 2](#)
- [7 March 2016 - Key matters: Strategic Site options, Transport update, Developing MOU's](#)
- [19 April 2016 - Key matters: PAH briefing, update on strategic sites](#)
- [6 June 2016 - Key matters: Consideration of 3 MOU's, Garden Town expressions of interest](#)
- [18 July 2016 - Key matters: Strategic sites presentation, MOU's update](#)
- [12 September 2016 - Key matters: Agreement of MOU's, Strategic options testing](#)
- [19 December 2016 - Key matters: J7a update, PAH updates, signing of MOU's](#)
- [23 January 2017 - Key matters: Garden Town bid, affordable housing across area](#)
- [27 February 2017 - Key matters: Distribution of OAHN MOU, Garden Town Officer post](#)
- [20 March 2017 - Key matters: MOU update, FEMA MOU work](#)
- [24 April 2017 - Key matters: Garden Town update, Broxbourne LP, Water capacity](#)
- [22 May 2017 - Key matters: MOU update, Water Cycle Study update](#)
- [26 June 2017 - Key matters: FEMA update, EA response on water capacity, Garden Town governance arrangements](#)
- [31 July 2017 - Key matters: update on London Plan, Harlow and Gilston Garden Town](#)
- [18 September 2017 - Key matters: Community led housing](#)
- [9 October 2017 - Key matters: HIF bid, Strategic site east of Harlow, E Herts Examination](#)

Harlow and Gilston Garden Town Board

Terms of Reference

Agreed 23rd July 2018

1. The Board is called the **Harlow and Gilston Garden Town Board**.
2. Its purpose is to:
 - to provide strategic leadership and oversight to the Garden Town project
 - to set and steer the project's direction and to monitor progress
 - to review the project's direction and objectives on an annual basis
 - to have responsibility and authority for the overall delivery of the project through the workstreams
 - to ensure there is effective community and stakeholder engagement in accordance with the consultation framework
 - to resolve issues and enable progress to be made
 - to agree proposals and make the decisions needed to progress the project
 - to make recommendations through the formal decision-making process of the various organisations represented on the Board
 - to ensure that appropriate resources are in place to deliver against the plan, programme and priorities and to co-ordinate the public-sector contribution to the delivery of key elements of the programme including the use of available GT capacity, or other relevant funding.
 - to provide a co-ordinated position/response to consultations and policy announcements that impact on the effective delivery of the GT vision and principles and to co-ordinate and ensure 'upwards' high level GT input into existing and/or emerging sub-regional/regional forums.
 - to champion the Harlow and Gilston Garden Town proposals and lobby for the required funding (both capacity funding and infrastructure funding) to deliver the project.
3. The Board will have an independent Chair for a 3-year tenure.
4. Board membership will be comprised as follows:
 - One Councillor from each authority (East Herts, Epping Forest, Harlow District Councils, Essex and Herts Counties) – (with voting and decision-making capacity)
 - One Chief Exec or senior manager from each authority (advisory capacity)
 - One health workstream representative (with voting and decision-making capacity)

- One representative from the business community - identified through the economic development workstream (with voting and decision-making capacity)
- One skills and education representative - identified through the economic development workstream (with voting and decision-making capacity)
- One representative from Homes England (advisory capacity)

5 The meeting will also be attended by the following people, but they will not be formal members of the Board:

- One Councillor from Uttlesford Council with officer support (advisory status)
- One Councillor from Broxbourne Council with office support (advisory status)
- Deputy Councillor representatives from East Herts, Epping and Harlow District Councils and Essex and Hertfordshire County Councils (observer status)
- The Garden Town Director, Project Planner and Project assistant (advisory capacity)

6 Other people may attend the meetings where appropriate:

- Up to two technical advisors from each authority (advisory capacity)
- Consultants may also be invited to attend meetings to present reports/studies to the Board and to provide technical advice
- Community representatives may be invited to attend meetings when relevant items are being considered
- Ward Councillors will be invited to attend meetings when specific masterplans are being considered
- Developer representatives may be invited to attend the meetings to present their masterplans to the Board as necessary
- Representatives from the Herts and SE LEAs and the LSCC will be invited to attend as observers/advisors
- There will be an open invitation to the local MPs

7 The Board will have no formal decision-making powers but will make recommendations back to the members' parent organisations. A schedule of Board decisions required will be developed, along with an indication of when formal Council or partner organisation decisions are needed.

- 8 Voting rights at meetings – Board members with voting rights will be the three District Cllrs and two County Cllrs as well as the health, business and skills and education representatives. Officers will not have voting rights.

Cllr deputies will have voting rights if they are substituting for their lead Cllr in his/her absence.

If no Cllrs are present from an Authority at any meeting, that Authority will not have voting rights at the meeting.
- 9 Board agendas, minutes and papers will be published on the Garden Town website. Confidential papers will be exempt from publication.
- 10 The Board will meet bi-monthly and that meetings commence at 6.30pm and finish at 8.30pm.
- 11 Informal seminars and workshops may be arranged in between the formal bi-monthly meetings.
- 12 Should urgent issues arise; the Chair can call an urgent Board meeting and the Board can also meet virtually.
- 13 The meetings will be held at venues within the Garden Town area.
- 14 The Board will be supported by the Garden Town team.

Training and development and Team building

A programme of informal training seminars/workshops will be put together to help members to understand the technical details of the project and to support them to make decisions. These seminars will be aligned to the decisions set out in the forward plan and members can also suggest subjects for training seminars or workshops.

An independently facilitated team building away day session will be held on an annual basis to help the Board members to develop their team working skills and to facilitate collaborative work on key project issues.

Garden Town Member Board- List of Meetings

10 September 2018

23 July 2018

18 June 2018

30 April 2018

26 March 2018

19 February 2018

22 January 2018

11 December 2017

13 November 2017

9 October 2017

18 September 2017

HARLOW DISTRICT COUNCIL
EQUALITY IMPACT ASSESSMENT FORM

Name of service, function or policy being assessed	Harlow Local Development Plan
Service/Department	Service - Place Department - Forward Planning
Names and roles of officers completing the assessment (indicate Lead officer)	Lead officer of assessment – Paul MacBride, Forward Planning Manager Supported by Wendy Hague - Project Officer Infrastructure
Contact telephone number of Lead officer	01279 446 258
Date assessment completed	1 May 2018

1. Aims of the policy/service/function and how implemented

	Key Questions	Notes
1.1	Is this a new policy/service/function or a review of an existing one?	<p>New - replaces The Adopted Replacement Harlow Local Plan (July 2006). The chronology for the preparation of the Local Development Plan is set out in the Local Development Scheme, which is available at: http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/Appendix%20C%20-%20Local%20Development%20Scheme.pdf</p> <p>The Harlow Local Development Plan (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) and National Planning Practice Guidance (NPPG). An Infrastructure Delivery Plan (IDP) has also been prepared to identify the infrastructure required to support future levels of growth.</p> <p>There is also an emerging development plan document for Harlow’s town centre, The Harlow Town Centre Area Action Plan, which will have its own Inset Policies Map.</p>
1.2	Briefly state the main purpose of the policy/service/function?	<p>The new Local Plan sets out the Council’s planning framework to guide future development and the use of land in the district. It identifies how Harlow will grow and develop whilst at the same time maintaining its attractiveness as a place to live, work and visit. The new Local Plan covers the period 2011–2033. Once adopted, the policies in the new Local Plan will replace the policies in the Local Plan 2006.</p> <p>The new Local Plan, together with The Harlow Town Centre Area Action Plan and the Minerals and Waste Local Plans for Essex will form the Development Plan for the district. The Development Plan is the basis upon which planning applications must be determined, unless there are material planning considerations that indicate otherwise. The policies of the Development Plan should be read as a whole.</p>

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		<p>The NPPF requires local planning authorities to plan positively and significantly boost the number of new homes being built. The Local Plan will include key objectives, development management policies and sites allocated for development within the district.</p>
1.3	<p>Briefly state the main activities of the policy/service/function?</p>	<p>The Local Plan is a long-term document which provides certainty to communities and businesses as to where development will be provided and, likewise, where inappropriate development will be restricted. It also allows infrastructure providers to plan effectively for the future.</p> <p>Whilst there is not a statutory requirement to undertake an Equality Impact Assessment of the Local Plan, it is essential that a strategic document like the Local Development Plan fully considers the legal duties under the Equality Act 2010. The purpose of carrying out an Equality Impact Assessment of the Local Plan is to ensure that the Council has had due regard to the need to advance equality of opportunity and to remove or minimise disadvantages suffered by people by reason of their protected characteristics; that steps are taken to meet the needs of people from protected groups where these are different from those of other people; and to encourage people from these protected groups to participate in public life or other activities where their participation is disproportionately low.</p> <p>The assessment seeks to comply with the National Planning Policy Framework (NPPF) 2012. The paragraphs which are especially relevant are:</p> <p>Paragraph 50: To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)</p>

		<p>Paragraph 69: The planning system can play an important role in facilitating Social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities, they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans</p> <p>Paragraph 155: Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision.</p> <p>This Equality Impact Assessment therefore considers not only the Local Plan as a whole, but also the consultation processes involved in the development of the Plan itself.</p>
1.4	<p>Who are the main beneficiaries? Whose needs are it designed to meet?</p>	<p>All those who engage with the planning process and require planning guidance and support.</p> <p>The main stakeholders for both this assessment and the Local Development Plan include:</p> <ul style="list-style-type: none"> • Private individuals/residents of Harlow District • Developers/landowners • Local/national organisations and agencies • Community and interest groups • Neighbouring Authorities • Existing communities • Service providers • Local businesses/employers • All protected groups that live, work and travel to the District will be affected by the Local Plan.

	<p>Harlow Council recognises that discrimination does not need to be intentional for unfair treatment or adverse impact to occur. The Council's approach to equality recognises that there is a range of different groups in the District who may have different needs and therefore the Council's services should be fairly and equitably provided to the whole community. The authority's Equality Policy can be accessed from the link below: https://www.harlow.gov.uk/equality</p> <p>Section 149 of the Equality Act is the Public Sector Equality Duty, which came into force in April 2011. It requires all public bodies, such as councils, to meet the needs of <i>all</i> individuals in day-to-day working operations. This includes when shaping policy, when delivering services and in relation to the Council's own employees.</p> <p>The Equality Act requires public bodies to:</p> <ol style="list-style-type: none">1. have 'due regard' to the importance of eliminating discrimination, harassment, victimisation and other such prohibited conduct;2. advance the equality of opportunity between those who share a relevant protected characteristic* and those who do not share it;3. foster good relations between those who share a relevant protected characteristic and those who do not share it <p>*The protected characteristics, as set out in the Act, are:</p> <p>Age</p> <p>Gender reassignment</p> <p>Being married/in a civil partnership</p>
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		<p>Being pregnant/having a child</p> <p>Having a disability (defined as: if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative impact on your ability to do normal activities)</p> <p>Race (including colour, nationality, ethnic or national origin)</p> <p>Religion, belief or lack of religion/belief</p> <p>Sex</p> <p>Sexual orientation</p> <p><u>Baseline characteristics for equality, diversity and inclusion (updated for the assessment)</u></p> <p>Harlow's population is approximately 85,900 residents¹. The district first reached its original target population of around 80,000 people in the mid 1970s, but by 1995 the population had declined to 73,600 people. Following planned expansions in the late 1990s and 2000s, the population grew again, particularly in two neighbourhoods, Newhall and Church Langley. By 2011, Harlow had a very high population density of 26.8 people per hectare, compared to 4.7 for Essex and 4.1 for England. This high density is offset by easy access to services and facilities and by the network of Green Wedges and other open spaces, a legacy of Sir Frederick's Gibberd's original Masterplan for the New Town.</p> <p>The population of Harlow, in comparison to the rest of Essex, is relatively young. In 2015, the proportion of residents aged between 0-15 years was 21%; the equivalent figure for mid-2016 was estimated to be 21.7%². The percentage of persons over the age of 65 years at 0.9% continues to be lower than the Essex and England averages. The dependency ratio (dependents/working</p>
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¹ ONS revised MYE 2016 22 March 2018

² ONS revised MYE 2016 22 March 2018

	<p>population) corresponds to the average for England.</p> <p>By 2033, projections suggest the proportion of people aged over 65 will rise significantly compared to the other age bands, and that there will be a significant drop in the proportion of people aged between 30 and 64. Life expectancy at birth for males was slightly below the England average (83.4 years) and slightly higher for females (86.7 years) in 2017.</p> <p>In terms of disability within the District, the percentage of all households with one person with a long-term health problem or disability was 25.4% in 2011. Approximately 10% of the total population in the District in 2011 provided some form of unpaid care with the majority providing 1 to 19 hours of unpaid care per week. Around 6.1% (5,025 people) of the total population provided unpaid care for up to 19 hours per week. The latest information (November 2016) for main benefit claimants indicates that the number of those claiming disabled benefits corresponds to the British average; for ESA and Incapacity Benefits, the Harlow figure was lower than the British average, but more than the regional average.</p> <p>Figures for marital and civil partnership status of residents in the District is based upon the 2011 Census and clearly do not reflect legislative changes in recent years. The District had a lower proportion of individuals that are married than the average for England (44.8 % via a vis 46.6%) and a higher proportion of individuals that are divorced compared to the national average. However, it was almost identical to the national average for single and same sex marriage. The number of lone parents in Harlow is currently high relative to the regional average.</p> <p>A breakdown of the ethnic diversity of the District reveals that in 2015 the percentage of people from an ethnic minority group was 14.5%, higher than average for Essex (7.4%) and for England (13.2%). In 2015, an injunction was granted to prevent unauthorised encampments being set up on 454 parcels of land in Harlow; this was extended in 2017 to cover the period up to 2020. This was in response to a high number of encampments being set up in Harlow. The GTAA³ for Greater Essex identified a need for no additional pitches for Gypsy or Traveller households that meet the revised planning definition as set out in the PPTS (2015).</p> <p>Looking at the religious breakdown from the 2011 Census, the percentage of the District that is Muslim is smaller than the regional and national averages. The percentage with no religion was</p>
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³ Essex, Southend-on -Sea and Thurrock GTAA Summary (January 2018)

		<p>33.9%. Of those professing to have a faith, just over 55% were Christians.</p> <p>In terms of socio-economic classification in 2015-16 the District had a lower proportion of the 'higher' classification jobs, such as managers, professional occupations etc., than the average for the East of England, or Great Britain as a whole (respectively 27.0%, 46.1% and 45.8%)⁴. The unemployed figures for Harlow for the same period i.e. April 2017 to March 2018 were equivalent to the figure for Great Britain (4.3%) compared to 3.7% for the East. No local figures were available for the number of carers looking after family. In terms of levels of deprivation, two wards areas within the District ranked within the 10% most deprived nationally (also known as the 1st decile). The overall deprivation score for the district was 23.6 in 2015, the average figure for England was 21.8. Children in low income families in 2014 were slightly higher than the average for England; no later data is available. Life expectancy between the most and least deprived wards for males is 4.1 years; the equivalent figure for females is 4.5 years⁵. Harlow has the second highest number of working age claimants claiming benefits across Essex.⁶</p> <p>In 2015, the proportion of the District's residents with no qualifications was higher than the average for the East of England and for England as a whole. This trend is also apparent for the latest area profile from Nomis. The percentage of population with no qualifications in Harlow is 11.15, for the East 7.2% and for Great Britain, 7.7%. In addition, there are far less of the District's residents with NVQ4 and above (i.e. all higher education qualifications) than the average for the East of England. Weekly earnings for full time workers for 2017 were also less in Harlow than the East and Great Britain (£524.30; £574.90 and £552.70</p>
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⁴ Nomis LA profile April 2107 to March 2018

⁵ West Essex CCG Annual report 2016

⁶ As 5.

1.5	Which staff carry out the policy/service/function?	<ol style="list-style-type: none">1. Forward Planning Officers2. Development Management Officers

2. Information Gathering and Data Collection

	Key Questions	Notes	If further data collection is needed – state by whom, when and how is it going to be done?
2.1	<p>What quantitative (numerical) data do you already have (e.g. national and local demographic data, equality monitoring data, employee data, customer profile data etc) about those who use or will use the policy or service?</p> <p>What gaps are there in the data?</p> <p>What else do you need?</p> <p>NB. Attach copies of the relevant data that you are using for this assessment</p>	<p>ONS⁷: Census data 2001 and 2011, historical Neighbourhood Statistics; Mid-year Estimates (MYEs); NOMIS; Population Projections 2016 based.</p> <p>DCLG Indices of deprivation 2015</p> <p>PHE: Essex and Harlow District Profiles 2017</p> <p>Essex Insight: Joint Strategic Needs Assessment (JSNA) 2016 Countywide and District Portraits</p> <p>ORS Essex, Southend-on-Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) 2016-33 <i>Endorsed by the Essex Planning Officers Association (EPOA) January 2018</i></p> <p>ORS Strategic Housing Market Assessment for East Hertfordshire and West Essex (SHMA) 2015 and July 2017</p> <p>Harlow Council Corporate Plan 2017 http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/Corporate%20Plan%202017.pdf Strategic Sustainability Appraisal (SEA) (Some of these documents are large files and are available on the Council website at https://www.harlow.gov.uk/evidencehttps://www.harlow.gov.uk/statistics)</p>	<p>No further data collection is needed before Submission of the Local Plan to the Secretary of State.</p> <p>The performance of the new Local Plan, once adopted, will be monitored at regular intervals using pre-agreed objectives and targets as set in Chapter 18 of the Plan.</p>

⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/latest>

2.2	<p>What qualitative data do you already have (e.g. results of customer satisfaction surveys, results of previous consultations, staff surveys, analysis of customer complaints/comments, feedback from community groups or individuals etc) about those who use or will use the policy or service? What gaps are there in the data? What else do you need?</p>	<p>Marmot Report 2010 Social Mobility Commission State of the Nation (5th annual report) 2017⁸ UCL Institute of Health Equity research papers NIHB Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health https://www.gov.uk/government/publications/gypsy-and-traveller-health-accommodation-and-living-environment</p> <p>RTPI Research papers http://www.rtpi.org.uk/media/1811222/poverty_place_and_inequality.pdf http://www.rtpi.org.uk/knowledge/research/planning-horizons/promoting-healthy-cities/ http://www.rtpi.org.uk/knowledge/practice/dementia-and-town-planning/</p> <p>Informal and formal discussions and negotiations with local organisations, landowners, adjoining Councils and other Council departments. Some of the informal discussions are commercially sensitive and are not in the public domain.</p> <p>Responses to formal public consultation that took place 2010-11, 2014 and 2017. https://www.harlow.gov.uk/local-plan</p>	
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⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/662744/State_of_the_Nation_2017_-_Social_Mobility_in_Great_Britain.pdf

3. Consultation

	Key Questions	Notes	If further consultations are needed/ planned – state with whom, by whom, when and how is this going to be done?
3.1	<p>What consultations have been held and with whom did you consult? What were the main issues raised?</p>	<p>During the preparation of the new Local Development Plan there have been three formal stages of public consultation. These have been held in accordance with primary and secondary legislation, the NPPF, the NPPG and the Council's Statement of Community Involvement (SCI).</p> <p>This includes:</p> <ol style="list-style-type: none"> 1. The Issues and Options Consultation 2010 (10 weeks) November 2010- January 2011 2. The Emerging Strategy and Further Options Consultation (2014) April-May 2014 3. Development Management Policies Consultation (2017) July-September 2017 <p>For each of the consultations, interested parties were able to respond by using the Council's online consultation portal, emailing comments to a dedicated email address or by writing to the Council.</p>	<p>Pre-Submission Publication (Summer 2018) (6 weeks)</p> <p>Any further consultations as required by the Planning Inspectorate post Submission to the Secretary of State.</p>

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		<p>Letters (and CDs containing documentation, where appropriate) or emails (depending on the contact information and any recorded choices of the recipients), were sent to relevant stakeholders to inform them of the consultation, along with information about the Local Development Plan, where they could view the documentation in public buildings and on the Council website, and how they could respond to the consultation. These stakeholders included:</p> <ol style="list-style-type: none"> 1. Various utility bodies (including Anglian Water and British Gas) 2. Local organisations (including West Essex CCG, the former PCT for Harlow and Princess Alexandra Hospital NHS Trust, educational bodies and charities) 3. National organisations (including Natural England, English Heritage and the Highways Agency) 4. Selected Harlow Council Councillors 5. Selected Harlow Council Officers 6. Adjoining district/city/borough/parish/town Councils (including Hertfordshire and Essex County Council and Parish Councils) 7. Landowners and tenants of sites affected by the proposals 	
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		<p>8. Any person, company or organisation registered on the Local Development Plan consultation database who stated they wished to be kept informed of relevant consultations</p> <p>For each consultation, a press notice was published in the <i>Harlow Star</i>, hard copies of the Plan and its associated documents were available to view at all of Harlow's libraries and at the Civic Centre, and all the documentation was available to download from the Council website.</p> <p>Static exhibitions in the Central Library and the Council Reception provided further information. On occasions advertised in the consultation materials, these were staffed by Council Officers to allow questions to be asked directly.</p> <p>In order to engage the younger people in Harlow in the preparation of the new Local Plan and the future of the district, meetings were held with the Harlow Youth Council relating to the earlier stages of consultation.</p> <p>Representations received during the consultations are summarised in Consultation Summary Reports; these can be found at https://www.harlow.gov.uk/local-plan</p>	
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		<p>Issues and Options (2010-11) The responses showed there was little support for the growth levels identified in the Regional Spatial Strategy, but strong support to meet local housing needs. The phasing of transport and other infrastructure improvements before large scale development was important.</p> <p>Emerging Strategy and Further Options (2014) Respondents identified the need for the need for high levels of growth to address existing key issues relating to affordability, infrastructure provision, regenerations needs and investment opportunities.</p> <p>Development Management Policies Consultation (2017) Main issues: Respondents queried the absence of strategic policies which were referenced in the text. The justification for some of the development management policies was queried. The absence of key evidence documents and the age of existing evidence/supporting documents was also raised.</p> <p>The Council prepared responses to each</p>	
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		representation and, where appropriate, made amendments to the text after consultation with elected members	
3.2	<p>What consultations were held specifically with the equality target groups? What were the main issues raised?</p>	<p>Among the stakeholders consulted for each consultation were the following groups specifically relating to equality:</p> <ol style="list-style-type: none"> 1. Equal Opportunities Commission 2. Gypsy Council 3. National Federation of Gypsy Liaison Groups 4. Harlow and District Access Group 5. Harlow Faiths Forum 6. Harlow Youth Council 7. Harlow MENCAP 8. Harlow MIND & West Essex MIND 9. Former PCT for Harlow (up to April 2013), West Essex CCG and NHS West Essex 10. Princess Alexandra Hospital NHS Trust <p>Representations were received from some of these groups. Key points are summarised below:</p>	<p>No further consultations required/planned.</p>

		<p>NHS West Essex: Objectives and priorities should be aligned to those of WEPCT and the JSNA; provision to be made for specialist housing because of ageing population; greater emphasis on green space for public health.</p> <p>West Essex CCG and NHS England: The needs of an ageing population with chronic underlying conditions should be considered alongside the needs of planned new growth.</p> <p>PAH NHS Trust: Policy CP4 Community to be carried forward from existing Local Plan</p> <p>Essex CC The County Council raised concerns regarding the absence of a health and well-being policy, which could be included in PL1. The use of Health Impact Assessments and Public Health Guidance issued by the authority were encouraged. The Glossary should be revised to complement possible changes to INF6.</p> <p>Education & Skills Funding Agency (launched 01.04.17) referred to the need for an up to date IPD, the possibility of a separate DPD for Schools, the absence of a Planning Obligations DPD and the need to mention schools in Policy IN6.</p>	
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		<p>Any member of the public, along with other groups (including other groups specifically relating to equality) would have been alerted to the consultations via the press notices, email/letter notifications (where requested or where statutorily sent) and website information, and could have made representations.</p> <p>Representations received from groups & individuals relating to equality, either directly or indirectly:</p> <p>Historic England supported H10 but asked for heritage assets to be added to part (a)</p> <p>Environment Agency supported H10 and suggested minor changes to the supporting text</p> <p>Sport England asked for the economic and health-well benefits of sport to be given greater prominence. The absence of newly prepared evidence relating to sporting facilities was queried.</p> <p>Developers and their agents expressed concerns regarding the justification for Policies H5, H8 and L1; particularly in the absence of localised disability data. Wording was too prescriptive. The costs of applying</p>	
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		<p>standards from Building Regulations, intended as optional, would render development unviable.</p> <p>The application of PR4 to outline planning applications was also queried as insufficient data may be available.</p> <p>Developers also considered the Green Wedges Policy to be too restrictive; more categories of community facilities should be considered as exceptions.</p> <p>An amenity society stressed the importance of enforcing restrictions on temporary encampments.</p> <p>A private individual asked for greater encouragement for bungalows to accommodate an ageing population.</p>	
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3.3	<p>Is the Council working in Partnership with other organisations to implement this policy/function? Should this be taken into consideration? (E.g. Agreeing the equalities monitoring categories) Should the partnership arrangements have an EIA?</p>	<p>Throughout the preparation of the Local Development Plan, the Council has worked in partnership with several organisations, including Essex County Council, Hertfordshire County Council, the West Essex PCT/CCG and The Princess Alexandra Hospital Trust, the Highways Agency; private consultants; adjoining District Councils; landowners and other Harlow Council departments.</p> <p>EIA is not required for the partnership arrangements.</p>	<p>Consultation is ongoing under the Duty to Cooperate (Localism Act 2011); there is a duty for public bodies to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. These could include matters which directly or indirectly affect the interests of protected groups that live, work and travel to the District.</p> <p>The Co-operation for Sustainable Development Member Board for the authorities in West Essex and East Hertfordshire was established in October 2014 and is supported by an Officer Group.</p>
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4. Assessment of Impacts

	Protected characteristic	Evidence and effect of impact on the protected characteristic
4.1	<p>Gender – identify the impact/potential impact of the policy/function on women, men and transgender people</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p><u>Positive impact</u></p> <p>It is considered that the Local Plan will not have a significantly greater impact upon one gender more than another.</p> <p>For transgender people, it is considered that the Local Plan will have a positive impact, as the provision and loss of community facilities, which could include LGBT venues, is covered by the criteria-based Policy L2. Policy HGT1 also addresses the need to create social and vibrant neighbourhoods and to consider infrastructure on-site and off-site to meet the needs of existing and future residents and visitors.</p> <p>Within the policy for the Garden Town, there are guiding principles which aim to create balanced, inclusive communities and sociable, walkable neighbourhoods. Improvements in creating safer environments will be of benefit to the whole community.</p> <p>It is possible that the design and amenity principles for development could reduce crime, the perception of which may be higher in females⁹. The Adopted Harlow Design Guide does address “secured by design” standards and a significant change may be difficult to measure.</p> <p>Through the introduction of new businesses and developments in the district, the Local Plan will create employment and training opportunities for all residents of Harlow and improve the image of Harlow as a sub-regional centre</p>

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⁹ <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/crimeinenglandandwalesannualsupplementarytables>

		<p>for employment in a greater range of sectors. Likewise, the preparation and delivery of a Skills Strategy with key partners and stakeholders is likely to improve the skills and educational attainment of residents in Harlow and across the sub region.</p> <p>These potential positive impacts are not, however, specific to this protected characteristic group.</p> <p><u>Relevant policies:</u></p> <p>PL1 PL2 HGT1 ED1-4 PR1 L2</p>
4.2	<p>Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including visual and hearing impairments, mobility impairments, learning disability etc)</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p><u>Positive impact</u></p> <p>Through the the introduction of new businesses and developments in the district, the Local Plan will create opportunities for all residents of Harlow and improve the range of training opportunities across a wide range of employment sectors and enhance access to employment for those previously at a disadvantage. Opportunities for flexible working are likely to be enhanced by greater access to high speed broadband.</p> <p>This potential positive impact is not, however, specific to this protected characteristic group.</p> <p>Other policies seek to ensure that new developments and existing key gateway locations are easy to navigate, prioritise pedestrian movements and provide community facilities on site or provide contributions towards local services or</p>

		<p>facilities for the whole community.</p> <p>In line with national legislation, policy and guidance, new/refurbished buildings for employment and residential use must consider requirements for disabled people, such as ramps, wide doorways and designated parking provision. In addition, 10% of market housing and 15% of affordable housing is to be for wheel chair users and in major residential development, the proportion to be built at M4 (3) standard is set out in the SHMA. The justification for the creation of a residential annexes include occupancy by a dependent relative or carer.</p> <p><u>Relevant policies include:</u></p> <p>ED3 SIR2 PL1 IN1-3 & IN6 H5 H6 H7 PR4 L1 to L3</p>
4.3	<p>Age – identify the impact/potential impact of the policy/function on different age groups</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p><u>Positive impact</u></p> <p>The Local Plan seeks to protect the interests of existing and of new communities for all ages. Facilities will be provided for all ages together with a wide range of housing types, including family, adaptable and specialist.</p> <p>Affordable homes are important for younger and older people and its delivery is a key priority. All new dwellings must meet certain Building Regulations to ensure they are accessible and adaptable to meet the occupiers' future needs.</p>

		<p>For larger developments, open spaces will be provided for recreation, relaxation and exercise.</p> <p>The IDP will also indicate the scale and location of investment required for improvements to the public transport system; the benefits will be of particular value to the young and old and its hoped that an increase in physical activity rates will enhance physical and mental well-being.</p> <p>This potential positive impact is not, however, specific to this protected characteristic group.</p> <p><u>Relevant policies include:</u> HGT1 HS3 SIR1 SIR2 PL1-9 H4-8 IN1 IN4 IN6</p>
4.4	<p>Race – identify the impact/potential impact of the policy/function on different black and minority ethnic groups, including Gypsy and Traveller communities</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p><u>Positive impact</u></p> <p>The Local Plan seeks to ensure that a range of housing options is provided. This includes the restoration of pitches at an existing site for the Travelling Community. The supporting evidence can be found within a joint Accommodation and Needs Assessment undertaken for Greater Essex. A criteria-based policy for proposals for new park homes is also included for those who no longer fall within the Government's definition of Gypsies & Travellers & Travelling Showpeople.</p>

		<p>The Plan seeks to strengthen the relationship between these groups and the settled community through the policies relating to design, amenity, the delivery of a skills strategy and access to training and other community facilities and services. The potential positive impacts are, therefore, not specific to this protected characteristic group.</p> <p><u>Relevant policies include:</u> HS4 H10 PL1-2 ED3 SIR1-2 H6 PR4 L2 IN1 IN4 IN6</p>
4.5	<p>Sexual orientation – identify the impact/potential impact of the policy on lesbians, gay men, bisexual and heterosexual people</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p><u>Positive impact</u></p> <p>The provision and loss of community facilities, which could include LGBT venues, is covered by Policy L2. This is a criteria-based policy. Policy HGT1 also addresses the need to create social and vibrant neighbourhoods and to consider infrastructure on-site and off-site to meet the needs of existing and future residents and visitors.</p>

		<p>The overall impact for those people of different sexual orientations is positive.</p> <p>These potential positive impacts are not, however, specific to this protected characteristic group.</p> <p><u>Relevant policies include:</u> L2 HGT1</p>
4.6	<p>Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no faith</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p><u>Positive impact</u></p> <p>The provision and loss of facilities which may enable the practice of faith and religious beliefs is covered by Policy L2. This is a criteria-based policy. Policy HGT1 also addresses the need to create social and vibrant neighbourhoods and to consider infrastructure on-site and off-site to meet the needs of existing and future residents and visitors.</p> <p>Communities and stakeholders are encouraged to become involved in the design and delivery of all facilities from the outset and in the delivery of the long term community engagement strategy.</p> <p>The overall impact for those people of different religions and faiths and for those who have no faith is positive.</p> <p><u>Relevant policies include:</u> L2 HGT1</p>

4.7	<p>Socio-economic disadvantage – identify any impact on those who have a low income, or whose family circumstances/history may affect their ability to access services eg. carers and the cared for; pensioners; single-parents; long-term unemployed; history of abuse/domestic violence; benefits claimants; housebound; chronically ill;</p>	<p><u>Positive impact</u></p> <p>The Local Plan seeks to create cohesive communities which provide a range of housing options including affordable homes. This should enhance access to employment areas and training opportunities which would not have been otherwise possible and at the same time, reduce the need to travel. Developments will also be required to local services within walking distance.</p> <p>Opportunities for flexible working are likely to be enhanced by greater access to high speed broadband which is likely to benefit those who are house-bound and their carers. New public transport options are likely to benefit this group more than those who are not disadvantaged economically and/or socially.</p> <p>The overall impact for those people experiencing socio-economic disadvantage is positive.</p> <p><u>Relevant policies include:</u></p> <p>PL1-2 ED3 SIR1-2 H6 PR1 PR4 L2 IN1 IN4 IN6</p>
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4.8	<p>Any other groups, if appropriate e.g. children leaving care; pregnant or breast-feeding mothers; carers;</p>	<p>Local area trend data for this category is not available</p>
4.9	<p>Are there any additional measures that could be adopted to further equality of opportunity in the context of this policy/service/function and to meet the needs of equalities groups that you have identified?</p>	<p>The performance of the Local Plan will be monitored regularly against pre-agreed objectives and targets as set out in Chapter 18 of the Plan.</p> <p>Any contextual changes which may have a material bearing on policies and proposals within the Plan will also be monitored; these could include revisions to legislation, national policy and guidance as well as case law, Ministerial Statements and new and/or revised corporate plans and strategies.</p> <p>The Authority's Monitoring Reports will also provide a commentary on progress and performance of all development plan documents together with a quantitative assessment of the implementation and delivery of housing and employment allocations and supporting infrastructure.</p> <p>The preparation of masterplans for strategic developments will normally include details of phasing for key infrastructure, thereby ensuring that access to services and facilities can be provided at the appropriate time. These are essential in schemes which cross local authority boundaries and should ensure that the interests of protected groups are safeguarded and enhanced. There are policies within all the Local Plans of the Garden Town Local Planning Authorities which refer to the preparation of masterplans.</p>

5. Summary Overview of EIA

Equalities category	No adverse impact AND promotes equality and diversity <i>Please tick ✓ if appropriate</i>	No adverse impact BUT equality and diversity NOT promoted <i>Please tick ✓ if appropriate</i>	Evidence of adverse impact <i>Please tick ✓ if appropriate</i>
Gender and transgender	✓		
Race	✓		
Disability	✓		
Age	✓		
Sexual orientation	✓		
Religion and belief	✓		
Socio-economic disadvantage	✓		

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Signed
Project Manager

Countersigned
Head of Service

Print Name DIANNE COOPER

Print Name JANE GREER

Date

Date

Under the Freedom of Information Act, this completed EIA form will be placed on the Harlow website and be available on request to the general public.

NB

Please provide a summary overview by completing the Section overleaf, ticking the relevant boxes to confirm the outcome and findings of this assessment process

It is also essential that you complete an action plan based on your assessment (see form EIA.2) and attach this to your Equality Impact Assessment form (EIA.1) form. This is a vital component of the equalities impact assessment process.

Include all of the measures that you will take to improve the policy/function for the different equalities characteristics, e.g. staff training, positive action, revisions to policy, monitoring of your action plan, etc.

Once you have completed the forms EIA.1 and EIA.2 please sign and date and:

- a) Send a copy to your Head of Service for endorsement
- b) Keep a copy as a record of the processes you have been through in carrying out the EIA
- c) Send a PDF copy of the signed and endorsed EIA form plus enclosed action plans to the Corporate Equalities Group via the HDC Community Liaison Officer equalities@harlow.gov.uk

Note

- If you are unsure of any aspect of this Equality Impact Assessment process you can seek guidance from your service representative on the Corporate Equalities Group or from the HDC Community Liaison Officer who can be contacted on equalities@harlow.gov.uk and extension 6388.
- Once the EIA form has been completed please ensure all enclosures are attached then sign and date the form, ensure it is countersigned by your Head of Service, keep a copy for your records and send a PDF to equalities@harlow.gov.uk

Note

- It is a legal requirement that consultation takes place with appropriate stakeholders as part of the EIA process.
- You must ensure that you record all the main areas of concern raised by equality and customer groups during consultations and how you aim to address these concerns.

Appendix J: Schedule of Minor Modifications

(Note: Modifications to the Policies Map are at the end of this Schedule)

Policy/Para/Page	Representation	Changes to text – deletion in strikethrough – addition in red (Dots denote where the existing paragraph continues before/after the text)	Reason for change
Chapters 1 and 2. Introduction and Spatial Context			
Para 2.33 Page 16	Essex County CouncilThere 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 and not just within ; to increase the provision of Sunday services; and to improve journey times for buses by decreasing congestion on Harlow's roads.	To ensure travel is sustainable and to consider the fact that there are other measures to improve bus journey times and not just the reduction in congestion
Para 2.34 Page 16	Essex County CouncilSustainable transport matters (including walking, cycling and public transport) and reducing the need to travel are, therefore, important for the successful future growth of Harlow.	To recognise that reducing the need to travel is also important to sustainability
Para 2.35 Page 16-17	Herts County Council	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 water bodies	To clarify and strengthen Green Infrastructure definition
Para 2.44 Page 18	Essex County CouncilResidential 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.	To recognise that location of development and sustainable transport modes are important
Para 2.45 Page 18	N/A	Significant increase change is required in the population of Harlow is required in order to deliver the enhancements needed to ensure Harlow is a sustainable town for residents, businesses and visitors.	To clarify that an increase in population is what is needed to resolve issues and challenges in the town.
Chapter 3. Spatial Vision and Local Plan Objectives			
Vision, final para Page 21	Natural England	New development will minimise the use of global resources, support the development of good waste management, and mitigate and adapt to the effects of climate change, and ensure	To be more NPPF compliant

		a net gain in biodiversity is delivered.....	
Fig. 3.3 (Local Plan Strategic Objectives) Page 22	Essex County Council	13. Reduce the need to travel by vehicle, and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport	To highlight future innovation in transport
Fig. 3.3 (Local Plan Strategic Objectives) Page 22	N/A	14. Improve transport links, particularly for sustainable modes of transport, to community all facilities.	To clarify the importance of improving links to all facilities including access to jobs
Chapter 4. Spatial Development Strategy			
Para 4.5 Page 28	Natural England	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.....	To be more NPPF compliant
Para 4.20 Page 31	M. Harris (Deanery of Harlow)This includes leisure and sporting facilities, playing pitches, playgrounds, allotments, and community halls and places of worship which will help reduce deprivation levels and promote healthy and active lifestyles.	To add reference to religious uses
Para 4.25 Page 31	Essex County CouncilImprovements will be made to the local highway network, and to the footway and cycleway networks and public transport to improve connections within Harlow and to areas outside the district.....	To add reference to improvements to cycle and footway network
Fig. 4.1 (Key Diagram – Legend) Page 33	Andrew Martin Planning (for Miller Homes)	Indicative New allotment	To clarify that the location of the new allotment provision on the Strategic Housing Site East of Harlow is currently indicative and not definite
Fig. 4.1 (Key Diagram) Page 33	N/A	Modify the Indicative Sustainable Transport Corridor route (SIR1-1 and SIR1-2 on key). Further details of route to be provided.	To update the route to ensure it reflects the revised indicative route
Chapter 5. Development and Delivery of Garden Communities in Harlow and Gilston Garden Town			
Fig. 5.1 (Components of the Harlow and Gilston Garden Town – Legend) Page 43	N/A	**New Garden Communities, and housing sites allocated in Harlow, to be delivered in accordance with the Harlow and Gilston Garden Town Spatial Vision and Design Charter.	To clarify
Para 5.27 Page 44 (HGT1 Implementation)	Essex County CouncilThe development is required to provide community facilities including Early Years facilities, a two-form entry primary school – two primary schools and appropriate contributions (including the provision of land) towards a new secondary school.....	To clarify in regards to the education position for the entire East of Harlow site in the Garden Town not just Harlow

Chapter 6. Promoting Sustainable Development			
Policy SD1 Page 49	Andrew Martin Planning (for Miller Homes)	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:	To be more NPPF compliant
Chapter 7. Housing Strategy and Growth Locations			
No changes			
Chapter 8. Economic Development and Prosperity Strategy			
No changes			
Chapter 9. Retail Ambitions and Town Centre Redevelopment			
No changes			
Chapter 10. Linking Development Sites to the Wider Environment			
Para 10.11 Page 82 (WE1 Implementation)	Herts County CouncilGreen Infrastructure also includes rivers, canals and other water bodies found in green spaces, as well as and non-accessible green spaces which provide visual amenity.....	To clarify and strengthen Green Infrastructure definition
Para 10.12 Page 82 (WE1 Implementation)	Herts County Council	On a strategic scale, the Green Infrastructure network in Harlow includes the Green Belt, Green Wedges, Green Fingers, and Other Open Spaces and the River Stort . On a smaller scale, it also includes trees, hedgerows, ponds, streams and landscaping in developments, such as green roofs or green walls.....	To clarify and strengthen Green Infrastructure definition
Fig. 10.1 (Land use types in Harlow) Page 83 (WE1 Implementation)	Herts County Council	<i>Add notation that water uses are included in Green Belt, Green Wedge, Green Finger and Other Open Spaces.</i>	To clarify
Para 10.15 Page 83 (WE1 Implementation)	Environment Agency	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.	To cross-reference policy with WFD
Policy WE2 Page 84	Environment Agency	The roles of the Green Wedges are to:	To ensure water bodies are

		<ul style="list-style-type: none"> • provide physical, visual and audial separation between neighbourhoods and between residential and industrial areas; • 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 water bodies;..... <p>Green Fingers are generally smaller and thinner than the Green Wedges. The roles of the Green Fingers are to:</p> <ul style="list-style-type: none"> • provide open links between Green Wedges and/or other areas of green space; • provide Green Infrastructure, including wildlife corridors; footpaths, cycleways and bridleways; and rivers, canals, ponds, lakes and other water bodies;..... 	referenced in the roles of the GWs and GFs
Policy WE3 Page 86	Natural England	All biodiversity and geodiversity assets in the district will be preserved and enhanced, to ensure a net gain in biodiversity	To be more NPPF compliant
Para 10.26, page 86	Quod (for Places for People)	The All biodiversity and geodiversity assets in Harlow are protected from inappropriate development.	To clarify protection of biodiversity and geodiversity assets
New para after existing para 10.26, page 86 (WE3 Implementation)	Quod (for Places for People)	Designated biodiversity and geodiversity assets are allocated on the Policies Map. The order of asset type follows the hierarchy in this policy (i.e. 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.	To clarify what designated and non-designated biodiversity and geodiversity assets are
Policy WE4 Page 87	N/A	Locally listed buildings are known as non-designated heritage assets	Not required – now explained more suitably elsewhere
Policy WE4 Page 87	Historic England Registered Historic P arks and G ardens.....The Conservation Areas, Scheduled Monuments and Registered H istoric P arks and G ardens are identified on the Policies Map.	To amend terminology
Chapter 11. Strategic Infrastructure Requirements			
Para 11.17 Page 93 (SIR1 Justification)	West Essex Clinical Commissioning Group	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	To clarify the important contributors to the provision of healthcare in Harlow and to identify the potential for increasing capacity within existing

		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.	healthcare infrastructure
Para 11.30 Page 94 (SIR1 Implementation)	Thames Water	It is anticipated that solutions to improving the network will be jointly funded by the utility providers and developers. 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.	To ensure that off-site infrastructure is completed and appropriately phased with new development coming forward.
Para 11.33 Page 95 (SIR1 Implementation)	Essex County CouncilSpecific 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.....	To refer to the County Council when negotiating on S106 agreements with developers
New paragraph after existing para 11.34, page 96 (SIR1 Implementation)	Herts County Council	Household Waste Facilities 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.	To identify the potential needs for increasing the capacity of household waste facilities. This has arisen since the production of the Harlow Infrastructure Delivery Plan
Policy SIR2 Page 96	Essex County Council 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 6. 7. Vehicular and pedestrian access points to the north of the Town Centre	To recognise Cambridge Road as an important key destination for vehicles, pedestrians and cyclists within close proximity of Harlow Mill Station and as a key entrance point from Hertfordshire including Bishop's Stortford and Sawbridgeworth. Also clarify Eastern Crossing as being the Second Stort Crossing to be

			delivered
Chapter 12. Background to Development Management in Harlow			
No changes			
Chapter 13. Placeshaping			
Policy PL1 Page 103	Essex County Council	(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 Spatial Vision and Design Charter, the Essex Design Guide and relevant national guidance;	To add reference to Essex Design Guide
Para 13.23 Page 107 (PL4 Implementation)	Canal & River Trust	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.	To include waterway uses and facilities related to existing use
Para 13.42 Page 111 (PL7 Implementation)	Herts County Council	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 water bodies. At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs, and green walls, rain gardens and ponds.	To clarify and strengthen Green Infrastructure definition
Para 13.44 Page 112 (PL7 Implementation)	Natural England	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.	To be more NPPF compliant and ensure protection and recovery of priority habitats and species
Policy PL8 Page 112	Natural England	Development should contribute to and enhance biodiversity or geodiversity assets, to ensure a net gain in biodiversity.....	To be more NPPF compliant
Para 13.45 Page 112 (PL8 Justification)	N/A	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 enable the appreciation of wildlife provide opportunities for people to enjoy nature.	Clarify opportunities for people arising from these assets
Para 13.46 Page 112 (PL8 Justification)	Essex County Council	Helping to protect and enhance biodiversity is one of the fundamental aims of national policies and guidance, to halt the	To be more NPPF compliant

		overall decline in biodiversity to achieve a net gain in biodiversity.....	
Para 13.47 Page 112 (PL8 Implementation)	Essex County Council 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.....	To add information
Para 13.48 Page 112 (PL8 Implementation)	Essex County Council	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. 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.	To add information on potential future declaration of assets
Para 13.49 Page 113 (PL8 Implementation)	Environment Agency	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.	To ensure eradication of invasive species; and add advice that ensures developers check the Essex Biodiversity Validation Checklist
Para 13.55 Page 114 (PL9 Implementation)	Environment Agency	The Council may will require a Preliminary Risk Assessment assessments of any pollution and/or contamination 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.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.	To require all contaminated land to be subject to Preliminary Risk Assessment
New para after existing para 13.55, page 114	Environment Agency	Where contaminated sites have the potential to mobilise contaminants, or where there is a high-risk development	To further protect groundwater

(PL9 Implementation)		proposal within a vulnerable ground water area, mitigation measures must ensure the risks to groundwater are minimised.	
Policy PL10 Page 114-115	Essex County Council	Re-order as follows: 2. 1. Water Management 3. 2. Flooding 4. 3. Sustainable Drainage Systems (SuDS) 4. 4. Water Quality	To structure policy more appropriately
Policy PL10 Page 114-115	Environment Agency	44. Water Quality Development must not adversely affect 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.	To ensure water quality improvement and increased protection for biodiversity
Policy PL10 Page 114-115	Environment Agency	32(a) it must not increase the risk of flooding elsewhere and must aim to reduce flood risk overall;	To ensure reduction of flood risk
Policy PL10 Page 114-115	Essex County Council	32 (c) flood 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 watertight depth finished floor level of 300mm above the normal predicted water level;	To correct terminology
Policy PL10 Page 114-115	Essex County Council	32 (g) flood flow routes should be preserved configured to enable surface water to drain;	To correct terminology
Policy PL10 Page 114-115	Essex County Council	32 (h) where necessary, planning permission will be conditional upon flood protection and/or runoff control measures being operative before other works. the submission and approval of a	To clarify what planning permission would be conditional upon

Second new para after existing para 13.61, page 116 (PL10 Justification)	Environment Agency	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.	To explain FZ 3b requirement
New para after existing para 13.63, page 116 (PL10 Implementation)	Environment Agency	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.	To encourage non-residential buildings to be as water efficient as possible
Second new para after existing para 13.63, page 116 (PL10 Implementation)	Environment Agency	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.	To include retrofitting of buildings regarding improving water efficiency
Para 13.67 Page 117 (PL10 Implementation)	Environment Agency• 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.	To strengthen policy regarding floodplain compensation
Para 13.68 Page 117 (PL10 Implementation)	Thames Water	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. into the ground (infiltration); 2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer. 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.	To expand hierarchy to include other options
First new para after existing para 13.68,	Environment Agency	It is expected that space is created for flooding to occur by restoring the functional floodplain, wherever possible, through a	To ensure adherence with national guidance on restoration of floodplain

page 117 (PL10 Implementation)		reduction of development footprint within Flood Zone 3b.	
Second new para after existing para 13.68, page 117 (PL10 Implementation)	Environment Agency	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.	To define the development referred to in part 3(b) of the policy
Para 13.72 Page 117 (PL10 Implementation)	Environment AgencyThe 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.	To ensure developers consider natural flood management techniques
First new para after existing para 13.72 Page 117 (PL10 Implementation)	Environment Agency	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.	To ensure the TRBMP is considered by developers and EA is consulted
Second new para after existing para 13.72 Page 117 (PL10 Implementation)	Environment Agency	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.	To provide further details on the requirements for waste water
Policy PL11 Page 118	Essex County Council	(a) the impact of development on the character, appearance, setting, or any other aspect of the significance of the asset or its setting;	To ensure setting of asset sufficiently recognised
Policy PL11 Page 118	Essex County Council	(d) the extent to which the development would enhance, or better reveal, the significance of the heritage asset;	To ensure 'hidden' assets are sufficiently recognised
Policy PL11,	Essex County Council	Where the heritage asset is at risk and the development would	To clarify what needs to be

penultimate paragraph Page 118		conflict with other policies of the Local Plan, it must be demonstrated that the development presents the asset's optimum viable use and is necessary to secure the future conservation of the asset and that any negative impacts are outweighed.	demonstrated																																	
Para 13.78 Page 119 (PL11 Implementation)	Essex County Council	Designated heritage assets can include listed buildings, curtilages of listed buildings, conservation areas, archaeological remains , Scheduled Monuments and Registered Historic 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. are known as non-designated assets. Historic England administers national designations which include all designated heritage assets apart from conservation areas.	To ensure archaeological sites have sufficient recognition																																	
Chapter 14. Housing																																				
Policy H5 Page 129	N/ABuilding Regulations Control Part M4(2) standard.....Building Regulations Control Part M4(3) standard....	Correcting terminology																																	
Para 14.23 Page 129	N/Ato support Building Control Regulations	Correcting terminology																																	
Para 14.26 Page 129	N/A	The Building Control Regulations Part M4(2) and Part M4(3)	Correcting terminology																																	
Para 14.27 Page 130	N/Arequired to be of Building Control Regulations Part M4(3) standard.....	Correcting terminology																																	
Fig. 14.1 (Range of housing types, sizes and tenures) Page 130 (H6 Justification)	N/A	<table border="1"> <thead> <tr> <th colspan="2">MARKET HOUSING</th> <th>%</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Flat</td> <td>1 Bedroom</td> <td>6.8</td> </tr> <tr> <td>2+ Bedrooms</td> <td>1.2</td> </tr> <tr> <td rowspan="4">House</td> <td>2 Bedrooms</td> <td>24.4</td> </tr> <tr> <td>3 Bedrooms</td> <td>67.6</td> </tr> <tr> <td>4 Bedrooms</td> <td>0.02 2</td> </tr> <tr> <td>5+ Bedrooms</td> <td>-</td> </tr> <tr> <th colspan="2">AFFORDABLE HOUSING</th> <th></th> </tr> <tr> <td rowspan="2">Flat</td> <td>1 Bedroom</td> <td>2.9</td> </tr> <tr> <td>2+ Bedrooms</td> <td>16.1</td> </tr> <tr> <td rowspan="2">House</td> <td>2 Bedrooms</td> <td>27.6</td> </tr> <tr> <td>3 Bedrooms</td> <td>41.1</td> </tr> <tr> <td></td> <td>4+ Bedrooms</td> <td>10.5</td> </tr> </tbody> </table>	MARKET HOUSING		%	Flat	1 Bedroom	6.8	2+ Bedrooms	1.2	House	2 Bedrooms	24.4	3 Bedrooms	67.6	4 Bedrooms	0.02 2	5+ Bedrooms	-	AFFORDABLE HOUSING			Flat	1 Bedroom	2.9	2+ Bedrooms	16.1	House	2 Bedrooms	27.6	3 Bedrooms	41.1		4+ Bedrooms	10.5	Typo
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Chapter 15. Prosperity			
No changes			
Chapter 16. Lifestyles			
Policy L1 Page 153	Countryside Properties	In major development, and depending on demonstrable need, public open space, and play space, and, where appropriate, allotments and sporting provision and facilities are required to be provided (or upgraded in the case of existing facilities), along with together in all cases with their ongoing management and maintenance.	To recognise that in some cases, new facilities may not be needed and existing ones could be upgraded
New para after existing para 16.8 Page 153 (L1 Implementation)	Barton Willmore (for De Merke Estates)	If providing public open space and play space in major development would not be achievable, developers will be required to submit a viability appraisal to show that such provision would render the scheme unviable.	To recognise that public open space provision may not be viable for smaller major development
New para after existing para 16.13 Page 155 (L2 Implementation)	T. Clarke (Theatres Trust)	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.	To require evidence that a facility/use has been marketed sufficiently prior to its possible loss
First new para immediately before para 16.16 Page 155 (L3 Implementation)	Barton Willmore (for De Merke Estates)	If providing public art in major development would not be achievable, developers will be required to submit a viability appraisal to show that such provision would render the scheme unviable.	To ensure viability is considered
Chapter 17. Infrastructure			
Policy IN1 Page 159	Essex County Council	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 and link to the existing cycleway, footway, public right of way and bridleway network, and, where appropriate	To ensure public transport provision is considered as part of new development proposals
Policy IN1 Page 159	Essex County Council	1. Sustainable Accessibility All development should have regard to the modal hierarchy as set out in the Strategic Policies below: <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <p>TOP</p> <ul style="list-style-type: none"> • Opportunities to reduce travel demand and the need to travel • Vulnerable road user needs such as pedestrians and cyclists • Passenger transport user needs </div>	Modal hierarchy missing from Strategic Policies. Included within Policy IN1 to clarify the modal hierarchy for Harlow

		BOTTOM	<ul style="list-style-type: none"> Powered two wheeler user needs such as mopeds and motorbikes Other motor vehicle user needs 	
Chapter 18. Monitoring				
Linking Development Sites to the Wider Environment Page 172	Essex County Council	Change in number of Local Sites in Positive Conservation Management biodiversity and geodiversity designated assets in the district		To tie in with the Single Data List 160-00 return to Government
Linking Development Sites to the Wider Environment Page 172	N/A	<p><i>Two new indicators:</i></p> <p>Amount of land in new development incorporating Sustainable Drainage Systems --- target Increasing trend --- relevant policy PL10</p> <p>Amount of land in existing development which has been retrofitted to incorporate Sustainable Drainage Systems --- target Increasing trend --- relevant policy PL10</p>		To ensure monitoring of SuDS in development
Chapter 19: Implementation				
No changes				
Glossary				
Biodiversity Page 180	N/A	Biodiversity The whole variety of life encompassing all genetics, species and ecosystem variations, including plans plants and animals.		Typo
Community Infrastructure Levy (CIL) Page 181	N/A	Community Infrastructure Levy (CIL) A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. Learn more about the Community Infrastructure Levy.		Not required
Conservation Area Page 181	Historic England	Conservation Area 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 protected by law it from against undesirable changes.		To clarify terminologies used
Flood Zone Page 182	N/A	Flood ZoneZone 1: Low probability: This zone comprises Land and assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).		To ensure brevity

		<p>Zone 2: Medium probability: This zone comprises 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.</p> <p>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. 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.</p> <p>Zone 3b: Functional Flood plain: This zone comprises Land where water has to must flow or be stored in times of flood. Local planning authorities should identify areas of functional floodplain, in agreement with the Environment Agency, taking. The identification of functional floodplain should take account of local circumstances.</p>	
Green Belt Page 182	N/A	<p>Green Belt An area of open land around an urban area, on which building inappropriate development is restricted, primarily to prevent unrestricted sprawl and to provide the other nationally-set purposes of Green Belt land.</p>	To ensure greater NPPF compliance
Green Finger Page 183	N/A	<p>Green Finger 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.</p>	To add more information
Green Wedge Page 183	N/A	<p>Green Wedge A series of open and predominantly green spaces, kept free from inappropriate development, which run through the urban area district and provide roles and functions as detailed in the Local Plan, including allowing residents to easily access to important landscapes and the wider countryside.</p>	To clarify and add more information
Heritage Asset Page 183	Historic England	<p>Designated Heritage Asset Includes listed buildings and their curtilages, Conservation</p>	To clarify terminologies used

(to move directly after Conservation Area once amended)		Areas, Scheduled Monuments and Registered Historic Parks and Gardens. A building, monument, site, place, area or landscape identified as having Such assets have been judged to be of national importance in terms of architectural or historic interest, therefore benefitting from additional planning controls. 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). They are administered by Historic England, with the exception of Conservation Areas which are administered by the Council.	
Green Infrastructure Page 183	Herts County Council	Green Infrastructure 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 water bodies. At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs, and green walls, rain gardens and ponds.	To clarify and strengthen Green Infrastructure definition
Locally Listed Building (NEW entry, directly after Infrastructure Delivery Plan) Page 183	Historic England	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.	To clarify terminologies used
Market Housing Page 185	N/A	Market Housing Private sector housing, whose the prices of which are is-set by the market.	To correct grammar
National Park Page 185	N/A	National Park 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).	Not mentioned in Local Plan

New Town Page 185	N/A	New Town.....They are designed by according to a master plan on a site where there was no settlement before.....	Typo
Non-Designated Heritage Asset (NEW entry, directly after <i>New Town</i>) Page 185	Historic England	Non-Designated Heritage Asset 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.	To clarify terminologies used
Registered Historic Park/Garden (NEW entry, directly after <i>Primary and Secondary Frontages</i>) Page 187	Historic England	Registered Historic Park/Garden Gardens, grounds, parks and other planned open spaces which are administered by Historic England and registered on the Register of Historic Parks and Gardens of special historic interest in England. They are designated heritage assets and benefit from the associated additional planning controls.	To clarify terminologies used
Scheduled Monument Page 187	Historic England	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.	To clarify terminologies used
Spatial Development Strategy (NEW entry, directly after <i>Source Protection Zones (SPZ)</i>) Page 187	N/A	Spatial Development Strategy 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.	To add information
Strategic Growth Strategy (NEW entry, directly after <i>Strategic Flood Risk Assessment (SFRA)</i>) Page 188	N/A	Strategic Growth Strategy Provides the Strategic Policies to deliver the Spatial Development Strategy.	To add information

Sustainable Drainage Systems (SuDS) Page 188	N/A	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.	To add information
Appendices			
No changes			
Policies Map			
Key	Andrew Martin Planning (for Miller Homes)	SIR1-6 Indicative New Allotment Provision	To clarify that the location of the new allotment provision on the Strategic Housing Site East of Harlow is currently indicative and not definite
Sustainable Transport Corridor	N/A	<i>Modify the Indicative Sustainable Transport Corridor route (SIR1-1 and SIR1-2 on key). Further details of modified route to be provided.</i>	To update the route to ensure it reflects the revised indicative route

Appendix K

<https://www.harlow.gov.uk/evidence>

List of Key Technical Documents

Housing	<u>AECOM Spatial Options Study (which informed the MOUs)</u>
	<u>Strategic Housing Market Assessment (2015)</u>
	<u>Harlow Strategic Site Assessment (2016)</u>
	<u>Updating the overall housing need paper August 2016</u>
	<u>Impact of formation rates on OAHN Feb 2017</u>
	<u>OAHN update for the East Herts Examination July 2017</u>
	<u>Affordable Housing Update for the East Herts Examination July 2017</u>
	<u>Gypsy and Traveller Needs Study (2017 update)</u>
	<u>Spatial Options Study (2014)</u>
	<u>Sustainability Appraisal of Strategic Options for the Housing Market Area (2016)</u>
	<u>Strategic Housing Land Availability Assessment (2014)</u>
Prosperity	<u>West Essex and East Herts Assessment of Employment Needs (2017)</u>
	<u>Retail and Leisure Needs Study (2017)</u>
	<u>Retail Frontages Study (2017)</u>
	<u>Harlow Future Prospects Study (2013)</u>
Placeshaping	<u>Harlow Area Landscape and Environment Study - 2005</u>
	<u>Harlow Open Space and Green Infrastructure Study (2013)</u>
	<u>Green Wedge Review (2014)</u>
	<u>Green Belt Review (2016)</u>
	<u>Local Wildlife Site Review (2011)</u>
	<u>Stort Valley Feasibility Study (2007)</u>
	<u>Great Crested Newt Study (2007)</u>
	<u>Strategic Flood Risk Assessment (2016)</u>
	<u>Water Cycle Study (to be completed)</u>
	<u>Garden Town Design Charter (to be completed)</u>
<u>Garden town spatial vision (to be completed)</u>	
Infrastructure	Transport Technical Notes
	○ <u>Tech Note 1</u>
	○ <u>Tech Note 2</u>
	○ <u>Tech Note 3</u>
	○ <u>Tech Note 4</u>
○ <u>Tech Note 5</u>	
○ <u>Tech Note 6</u>	
<u>Delivery Study for Harlow and Surrounding Area: Infrastructure Delivery Plan – 2018</u>	
<u>Local Plan Viability Assessment, Affordable Housing and CIL Review – 2018</u>	
<u>Sustainable Transport Corridor Study (to be completed)</u>	
<u>Garden Town Infrastructure Delivery Plan (to be completed)</u>	
Lifestyles	<u>Sports Facilities and Playing Pitches Assessment (to be completed)</u>

Duty to Cooperate	MOUs <ul style="list-style-type: none"> ○ MOU OAHN ○ MOU Highways ○ MOU Epping Forest
	Garden Town Expression of Interest
	Duty to Cooperate Report (to be completed)
Local Plan Page https://www.harlow.gov.uk/local-plan-publication	Sustainability Appraisal - Report
	Sustainability Appraisal - Non-Technical Summary
	Habitats Regulations Assessment
	Equality Impact Assessment (to be completed)
	Essex Waste Local Plan
	Essex Minerals Local Plan
	Authority Monitoring Report 2016-17
	Updated LDS (to be completed)
Supplementary Planning Documents	The Essex Parking Standards: Design and Good Practice - 2009 http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/Parking%20Standards%20Design%20and%20Good%20Practice%202009.pdf
	The Essex Design Guide https://www.essex.gov.uk/Environment%20Planning/Development-in-Essex/Documents/19715_essexdesignguide.pdf
	Harlow Design Guide SPD (Adopted October 2011) https://www.harlow.gov.uk/spd <ul style="list-style-type: none"> • Harlow Design Guide SPD - Part 1 (pdf) • Harlow Design Guide SPD - Part 2 (pdf) • Harlow Design Guide SPD - Part 3 (pdf) • Harlow Design Guide SPD - Part 4 (pdf) • Harlow Design Guide SPD - Part 5 (pdf) • Harlow Design Guide SPD - Part 6 (pdf) • Harlow Design Guide SPD - Part 7 (pdf) • Harlow Design Guide SPD - Part 8 (pdf) • Harlow Design Guide SPD - Part 9 (pdf) • Harlow Design Guide SPD - Part 10 (pdf) • Harlow Design Guide SPD - Part 11 (pdf) • Harlow Design Guide SPD - Part 12 (pdf)

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: JOINT FINANCE AND PERFORMANCE REPORT,
QUARTER 1 2018/19

PORTFOLIO HOLDER: COUNCILLOR MIKE DANVERS, PORTFOLIO
HOLDER FOR RESOURCES

LEAD OFFICER: SIMON FREEMAN, HEAD OF FINANCE
(01279) 446200

CONTRIBUTING OFFICERS: SENIOR MANAGEMENT BOARD (01279) 446004

This is not a Key Decision

It is on the Forward Plan as Decision Number I008563

The decision is not subject to Call-in Procedures for the following reason:

The recommendations are within the scope of the original budget and Corporate Plan approved by Full Council in February 2018.

This decision will affect no ward specifically.

RECOMMENDED that:

- A** Cabinet acknowledges the projected outturn position set out in sections three and four of Appendix A to this report for the first quarter (April – June) of 2018/19 as follows:
- i) An adverse variation on controllable budgets of £109,000 representing 0.18 percent of the gross General Fund Budget.
 - ii) A total projected underspend of £429,000 representing -0.71 percent of the gross General Fund Budget.
 - iii) The Council performed on or above target for 47 out of 48 (98 percent) of its quarterly performance indicators.

REASON FOR DECISION

- A** To ensure that Cabinet reviews performance against the Council's approved General Fund Budget and Corporate Plan for 2018/19 and acknowledges the small variation to the forecast outturn position.

BACKGROUND

1. This report sets out the Council's corporate priorities and financial and performance position as at the end of the June 2018. The report is the first in the formal reporting process for the 2018/19 financial year.

ISSUES/PROPOSALS

Summary of Quarter One Financial Performance 2018/19

2. A review of the first quarter of 2018/19 indicates that, in total, the controllable General Fund Budget is projected to overspend by £109,000 or 0.18 percent when compared to the approved gross General Fund Budget. Section three of Appendix A to this report summarises the major budget variations. This variance is extremely small in the context of the Council's approved budget and range of services provided.
3. Taking into consideration the budgets which are not directly under service area control the overall position at the end of June 2018 is that the General Fund Budget is forecast to underspend by £429,000 or -0.71 per cent when compared to the approved gross General Fund Budget.
4. Careful management of budgets continues to be exercised across all services in order to guard against expenditure pressures and to offset income reductions.

Summary of Quarter One Operational Performance 2018/19

5. Section four of Appendix A details the Council's operational performance. The Council performed on or above target for 47 out of 48 (98 percent) of its quarterly performance indicators. Sixty-seven percent of the indicators have been maintained or improved compared to Quarter One 2017/18.
6. Fifteen (six percent) of the Corporate milestones have been successfully completed, 166 (70 percent) of the Corporate milestones have started and are on track, and 55 (23 percent) of the Corporate milestones have not started as the due dates are in the future.
7. The Council continues to improve performance in key areas linked to its Corporate Priorities. Some of the performance indicators that have contributed to this achievement are:
 - a) CSO2b – Percentage of lost calls for Contact Harlow;
 - b) CS25Q – Percentage of customer complaints responded to within target time;
 - c) BVO10 – NNDR collected;

- d) HTS 2.1a – Routine cleaning of streets (NI 195) Litter to Grade A standard (Wave);
 - e) HTS 2.4 – Average time (in hours) to remove fly tips;
 - f) HTS 5.3 – Standard requests for repairs and minor adaptations carried out within 20 working days; and
 - g) NI157c – Processing of other applications within 8 weeks or agreed timescale.
8. One out of the 48 (two percent) performance indicators did not perform as well as expected. The indicator detailed below has an Improvement Action Plan (IAP) which outlines the performance situation and the steps for improvement.
- a) BV082ai – Household Waste Recycled.

Significant Risks/Opportunities

9. The Council is operating in a period of major change driven by both worldwide economic conditions and legislative changes being introduced by the Government. Some of the key changes that will or already are impacting on the Council include:
- a) The risk and volatility associated with the Government’s localisation of Council Tax support and business rates;
 - b) Variations in income from fees and charges and other specific grants;
 - c) Ongoing low staff turnover rates which put at risk the achievement of the vacancy savings targets allocated to each service within the Council’s budget; and
 - d) The uncertainty regarding the future financial settlements including the end of the current four year funding deal beyond the current spending review period from 2021/21 onwards.
10. Section six of Appendix A details information about the one exceptional risk (rated 20 or higher – high likelihood, high impact) recorded in the Council’s Risk Register as at June 2018 related to lack of suitable housing mix which is:
- a) The town requires a suitable housing mix to attract new and retain existing residents for an evolving and sustainable community. Supply must be balanced with demand and housing need, taking into account national housing and planning policies. As part of that mix, housing for local people that is genuinely affordable remains a high priority for the Council.

11. Implementation of the Local Development Plan will mitigate this risk and direct delivery of council housing is also being pursued along with set up of a housing delivery company under the HTS Group.

IMPLICATIONS

Place (Includes Sustainability)

As contained within the report.

Author: Jane Greer, Head of Community Wellbeing on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

As contained within the report.

Author: Simon Freeman, Head of Finance

Housing

As contained within the report.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

As contained within the report.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

As contained within the report.

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

Appendix A – Joint Finance and Performance Report, Quarter 1 2018/19

Background Papers

None.

Glossary of terms/abbreviations used

IAP – Improvement Action Plan

Harlow Council

**Joint Finance and Performance Report
for the period ending**

30/06/2018

The Council's aim for 2018-19:-

"to improve Harlow for residents, businesses and visitors"

The Council's 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



How to use this report

You may wish to consider the following questions to form an idea on how well the Council is doing in achieving its priorities and objectives.

Questions which the reader may wish to consider:

1. What are the reasons for the performance being below target?
2. What is the Council's expenditure on this service?
3. Has performance fluctuated between quarters and what are the reasons for this?
4. Is it anticipated that the target will be met by the end of the year?
5. What are the proposed actions to improve performance and achieve the target and when will this be done by?
6. How well is the Council responding to gaps in performance or shortfalls in income?

Other areas for consideration could include:

1. Is the indicator a high priority for the Council? Is this reflected in the budget?
2. How does the service compare to other local authorities in terms of value for money – how does the Council's expenditure on this service and performance achieved compare to similar local authorities?
3. What are other Council's doing to improve performance in this area?
4. Are there any overspends/underspends in the budget area within which the under performing indicator sits?
5. Are there any future projects planned that will enhance existing performance?
6. How severe or likely are risks associated with lower level performance?

Performance Symbols:

Harlow Council uses the below symbols when reporting performance.

Below Target: e.g. more than 5% worse than target	On Target: e.g. within 5% of target	Above Target: e.g. more than 5% above target	Data not yet available: e.g. survey information pending
			

Direction of Travel (DOT) Symbols:

The direction of travel is from the same quarter in the previous year.

Going up and getting better e.g. % of rent collected	Going down and getting better e.g. crime levels	Exactly the same as previous year	Going up and getting worse e.g. levels of litter	Going down and getting worse e.g. income generated
				

Section One: Key Considerations

The key issues relating to the Council's finances, performance, risks and corporate plan:

1380

FINANCE

The forecast outturn position for 2018/19 is that the controllable General Fund revenue budget will overspend by £109,000 on its gross controllable costs. This represents an overspend of 0.18% of the Council's approved gross budget for the General Fund. Taking into consideration the budgets which are not controllable by services, there is an overall forecast underspend is £429,000 or -0.71%.

Key risks in relation to financial management are currently:

1. The risks and volatility likely to be associated with the Government's planned funding review and resulting Business Rates Retention scheme.
2. The uncertainty regarding any national and local impacts as a result of the UK's exit from the European Union.
3. Variations in income from fees and charges and public spending habits respond to the economic climate.

The following performance indicators did not meet their performance target:

Place Services : BV082ai Household waste recycled (%)

PERFORMANCE

RISK

The following **exceptional residual risks** (rated as high likelihood, high impact) have been highlighted for this quarter:

CR03 - Lack of Suitable Housing Mix

Six per cent of the milestones were successfully completed between April and June 2018.

Seventy per cent of the milestones have started and are on track.

Twenty-three per cent of the milestones have not started as the due dates are in the future.

There are no 'red' milestones for the quarter one.

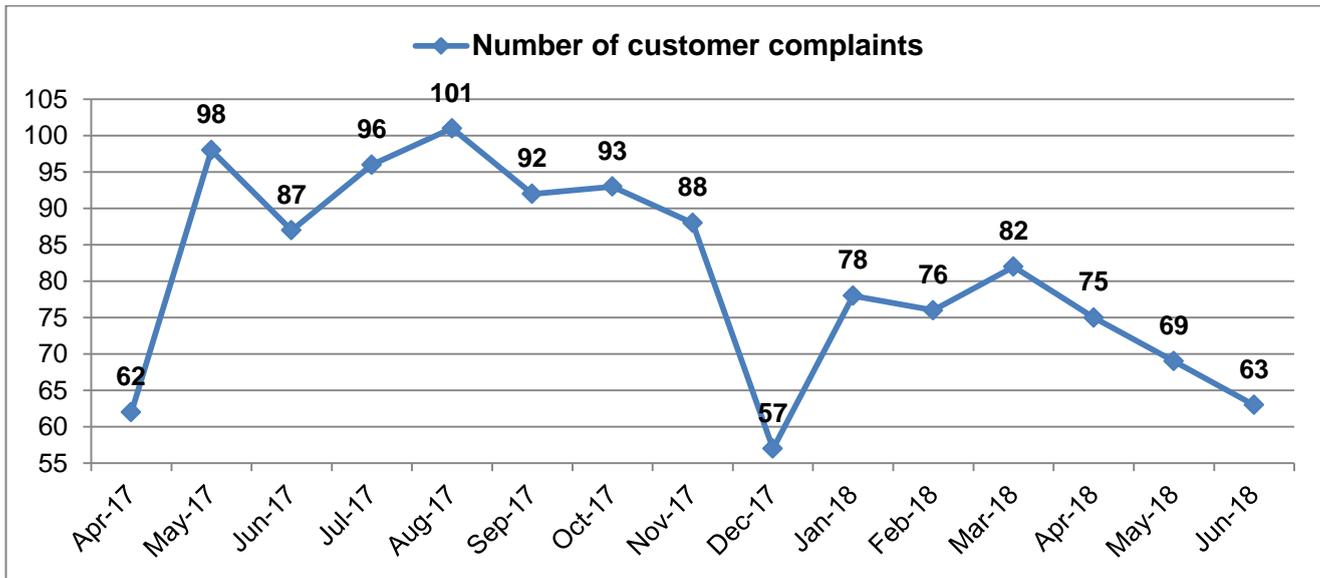
CORPORATE PLAN

Section Two: What our Customers are telling us (Complaints)

The Council provides and commissions a large number of services to a population of over 85,000 residents. Each year the Council undertakes over 600,000 housing transactions, deals with hundreds of thousands of enquiries at Contact Harlow and provides an administrative service for Housing Benefit and Local Council Tax Support to a caseload of nine thousand benefit claimants.

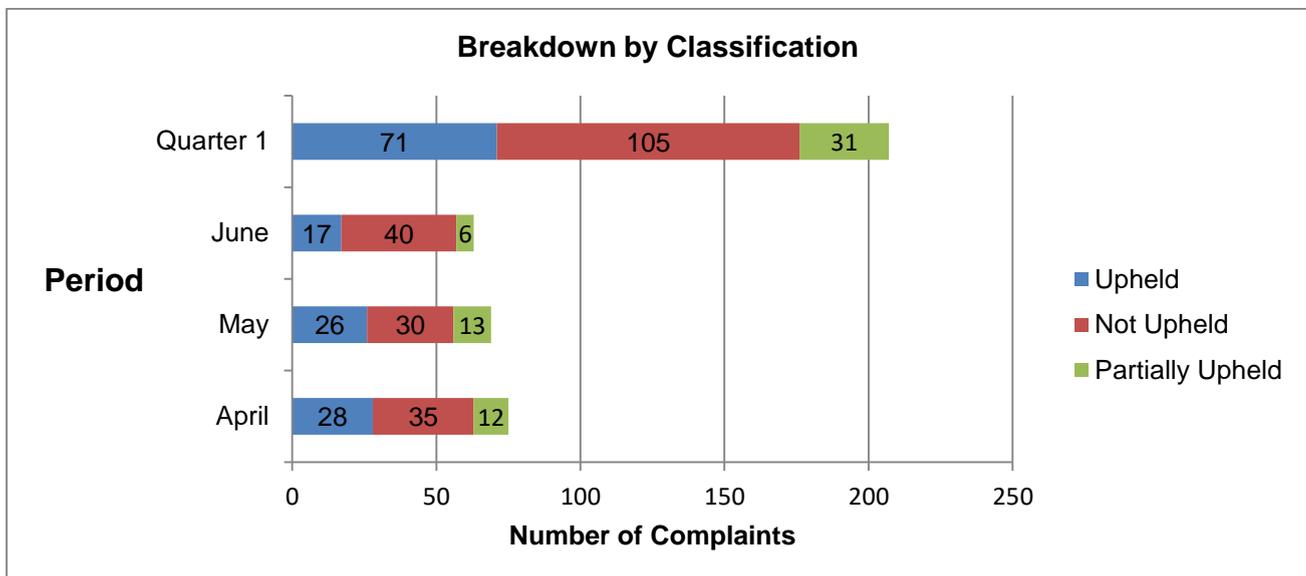
The Council aims to respond to and resolve all stage one and stage two complaints within ten working days and stage three complaints within 15 working days.

The chart below shows a gradual decrease in the number of complaints compared with the previous quarter (April to June 2017).



In Quarter One (April to June 2018), the Council received a total of 207 complaints. Of these, complaints 71 (34%) were upheld, 105 (51%) were not upheld and 31 (15%) were partially upheld.

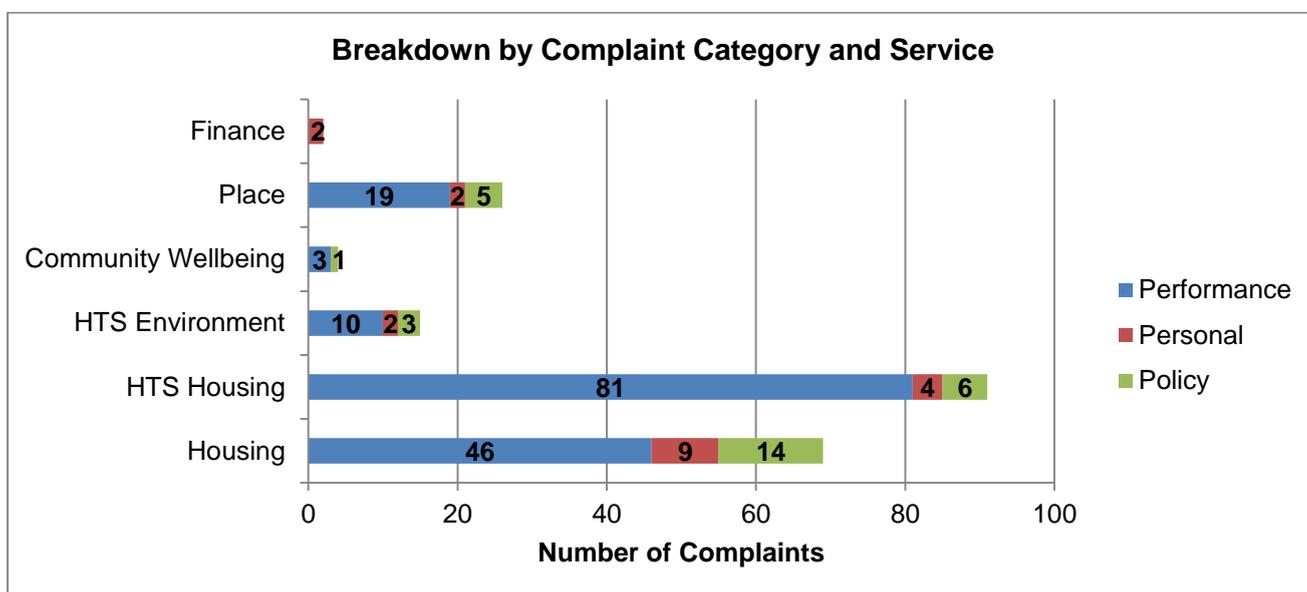
The chart below breaks down the classifications for each month in Quarter One.



Eighty-seven per cent of the complaints were resolved by Stage One, nine per cent of the complaints were resolved by Stage Two and four per cent of the complaints reached Stage Three. The table below breaks down the complaints stages by month.

Time Period	Stage One	Stage Two	Stage Three
April	67	4	4
May	57	9	3
June	56	6	1
Quarter One (Total)	180	19	8

The chart below shows the number of complaints related to a) performance; b) person; and c) policy. Between April and June 2018, there were 159 (performance), 19 (person) and 29 (policy) related complaints.



Since April 2018, additional information has been collected on all closed complaints that were either upheld or partially upheld to ensure lessons are learnt to improve service delivery; and minimise the risk of reoccurrence.

The information is logged by the Service areas responding to the complaint and includes:

- What will be done as a result of the complaint?
- Who by?
- By when?

The Service areas provide a monthly report to the Customer Services Officer to ensure that action(s) are completed. Any failures/blockages are reported to the Customer and Media Services Manager to progress to the relevant Head of Service.

Reports will be provided to the Senior Management Board showing the trends and resolutions to ensure continuous improvement.

Section Three: The Latest Financial Performance

The Council continues to face financial challenges, especially those created by the long term reductions in its core Government funding, which have and will continue to feature within its Medium Term Financial Strategy (MTFS). The contents of this report highlight the excellent financial control being placed upon existing budgets by all services.

The Governments intended review of local Government funding continues to create significant uncertainties for the future but with the record of strong financial management coupled with the ambition to operate to lower cost base in advance of required savings, the Council can have confidence that its services will continue to be delivered to the residents it serves without reduction or cuts for the foreseeable future.

The forecast service overspend on the controllable budgets in 2018/19 total £109,000 or 0.18% of the Council's gross budget. Taking into account the non-controllable costs, there is a forecast underspend is £429,000 or -0.71% of the gross budget.

Simon Freeman, Head of Finance

[Movements In General Fund Balance Quarter 1.pdf](#); [The Budget Variances_ Exceptions \(Quarter 1\).pdf](#)

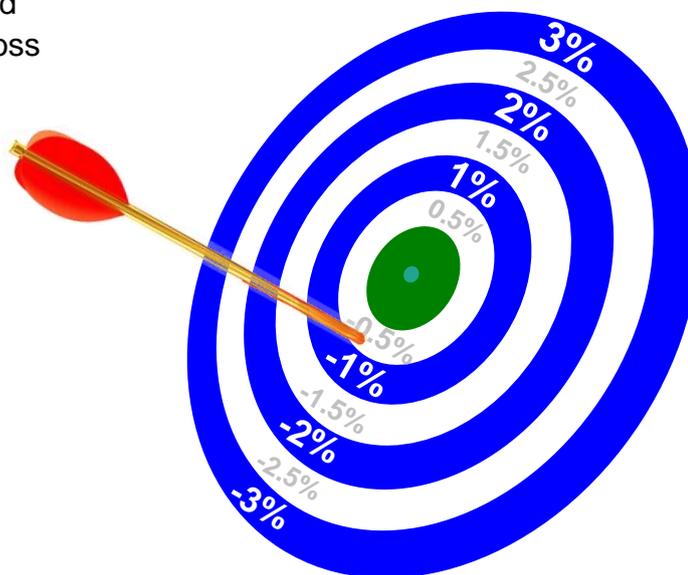
Movements in General Fund Balance in Quarter One 2018/19

	<i>£millions*</i>
General Fund closing balance as at 31 March 2018	6.734
Variations resulting from previous Cabinet / Council decisions:	
• Planned investment in Harlow's environment	(1.000)
• Transfer to Harlow & Gilston Garden Town Funding Reserve	(0.500)
• Replacement of Paddling Pools	(0.750)
• Contribution to Discretionary Services Fund	(0.026)
• Carry forwards from 2017/18 to 2018/19	(0.137)
Effective General Fund closing balance as at 31 March 2018	4.321
Current Variations	
• Service budget variations	(0.109)
• Other variations	0.538
Balance on General Fund at 31 March 2018 (Projected)	4.750

* Note: Figures in brackets () reduce the projected General Fund Balance.

2018/19 Projected Outturn

The Council projects to underspend by a margin of **-0.71%** on its gross General Fund revenue budget.



Latest Financial Performance (Budget Variations / Exceptions):

Major Variances - Quarter 1 of 2018/19

Service	Adverse £000s	Favourable £000s	Net £000s	Main Contributing Factors to Variations
Community Wellbeing				
Support for Voluntary Organisations		(76)	(76)	This budget was previously used to award Discretionary Rate Relief to businesses / charities. This expenditure is now accounted for within the Collection Fund rather than the General Fund as a result of legislative changes in accounting practice.
The Playhouse	30		30	The overspend at the Playhouse has occurred due to technicalities related to the Playhouse Capital investment programme in 2018/19.
Regeneration Team	34		34	Reconciliation of staffing budgets between service areas will be required over the following quarter
Other Minor Variations	14		14	
Total Community Wellbeing			2	
Place				
Cemetery & Crematorium	30		30	Legal fees and other costs associated with the extension of burial land.
Housing Garages - GF	31		31	This forecast variation reflects net reallocation of costs between the HRA and GF.
Commercial Properties - Miscellaneous		(38)	(38)	Forecast increased rental income.
Other minor variations		(8)	(8)	
			15	
Housing (General Fund) Services				
Supporting People		(23)	(23)	Increased income for alarms.
Housing Options & Advice	189		189	A forecast increase in the cost of temporary accommodation.
Other Minor Variations	10		10	
Total Housing (General Fund) Services			176	
Finance Service				
Revenues and Benefits		(61)	(61)	Additional government grant funding offset by increased bank charges and Allpay charges and the cost of GDPR software.
Early Retirement / Under Funding Pensions	35		35	An underspend on Added Years Superannuation which is offset by financial strain payments.
Minor Service variances	19		19	
Total Finance Service			(7)	
Managing Director and Services				
Managing Director		(11)	(11)	Salary and superannuation savings.
Governance				
Head of Governance		(29)	(29)	Underspend on salaries offset by agency staff costs.
Other minor variances		(37)	(37)	
Total Governance Service			(66)	
Service Specific Variations			109	Sub-total
Other				
Council Tax Sharing Agreement		(60)	(60)	Council Tax sharing agreement income from County, Fire and Police is estimated at £460,000. This compares to an approved income budget of £400,000.
S31 Grant		(188)	(188)	Grant received from the Government to compensate the Council for legislative changes that reduce the amount of business rates that are collected.
HTS Management		(290)	(290)	The year-end variation reflects the final settlement from Kier following the conclusion of the JVCO.
Total Other Variations			(538)	Sub-total
Total General Fund Budget Variations			(429)	

Service Based Analysis

Community Wellbeing, Jane Greer

Overall, financial control is generally satisfactory although some reconciliation of staffing budgets between service areas will be required over the following quarter. In addition the overspend at the Playhouse has occurred due to technicalities related to the Playhouse Capital investment programme in 2018/19.

Place Services, Jane Greer on behalf of Graeme Bloomer

Financial control for the first quarter has been satisfactory and there are no indications from this quarter's results that would point towards areas of particular concern.

Housing, Andrew Murray

Resources for housing need were previously reduced through on-going prioritisation and targeting of resources against continued increases in the costs associated with external temporary accommodation. Incidences of homelessness have however continued to rise both locally and nationally. Central Government initiatives to reduce homelessness including the commencement of the Homelessness Reduction Act in April 2018 have placed additional relief duties on the Local Authority to provide longer term temporary accommodation whilst homelessness enquiries are completed.

No additional budget was identified to cover these increases. Additionally, increased prevention duties require extra resources to comply with the new legislation. Whilst actual numbers in TA remained constant during Quarter 1 it is anticipated that levels will rise over the remainder of the year and this reflects in the present forecasted budget variation. The Homelessness Reduction Act places uncertainties over future levels of activity throughout the remainder of 2018/19.

The review of supported housing was completed in November 2017. Cabinet recommended a plan for going forward against the background of reduced funding and cessation of funding from Essex County Council for Housing Related Support.

Governance, Colleen O'Boyle

Good financial control continues to be maintained during the first quarter of the 2018/19 financial year with no major variations to be reported at this stage of the year. Issues which may arise will generally be staffing related, through the occurrence of vacancy savings currently built in to the service budget. Income from Land Charges will be monitored closely as this will be largely determined by the housing market locally.

Finance, Simon Freeman

The current forecast for the Finance Service is that it will underspend by £7,000 in 2018/19. This is an extremely small variance against service controllable budgets of over £40 million and the position will continue to be monitored very closely throughout the remainder of the financial year to ensure that the service manages within its approved budget allocation.

Section Four: Performance

The Council performed on or above target for 47 out of 48 (98 per cent) of the performance indicators. Sixty seven per cent of the indicators have been maintained or improved compared to Quarter One 2017/18.

Percentage of indicators within or better than target	Qtr ended 30/06/2017	Qtr ended 30/09/2017	Qtr ended 31/12/2017	Qtr ended 31/03/2018	Qtr ended 30/06/2018
	95 %	98 %	98 %	92 %	98 %
Percentage of indicators improving or unchanged from the same period last year	Qtr ended 30/06/2017	Qtr ended 30/09/2017	Qtr ended 31/12/2017	Qtr ended 31/03/2018	Qtr ended 30/06/2018
	67 %	60 %	64 %	57 %	67 %

Good Performance:

The Council continues to improve performance in a number of areas. Twenty two out of forty eight (46 per cent) performance indicators performed significantly above their target. Listed below are a selection of the performance indicators which have contributed towards the achievement of the Council's priorities.

		30/06/2018 Actual	30/06/2018 Target	30/06/2017 Actual	30/06/2017 Target
★	↓	9.02	14.00	11.34	15.00
Community Wellbeing : CS02b % Lost calls for Contact Harlow (Quarter Cumulative)					
The improvement in performance is a result of resourcing the call centre effectively to manage the fluctuating call demands.					
★	↓	89.37	85.00	77.73	85.00
Community Wellbeing : CS25q % of customer complaints responded to within target time					
Complaint reports are provided to Service Managers highlighting the progress of all complaints to ensure they are closely monitored. This has resulted in a reduction in the number of complaints going out of target and improvement in the timescales.					
★	↓	31.96	29.90	30.74	29.90
Finance : BV010 NDR collected (%)					
Quarter 1 performance was due to the a high value account paying the full years charge in April 2018.					
★	↓	0.67	3.00	1.33	4.00
Place Services : HTS 2.1a Routine cleaning of streets (NI195) Litter to Grade A standard (Wave)					
HTS consistently review feedback from residents' and "Keep Britain Tidy" surveys to target litter, particularly its impact in hot spot areas across Town. This has enabled HTS to allocate resources where necessary and maintain a high performance.					
★	↓	1.42	3.50	1.50	3.50
Place Services : HTS 2.4 Average time (in hours) to remove fly tips					
HTS place great importance on the quick clearance of all reported fly tipping. This has led to HTS consistently exceeding its performance by a substantial margin.					
★	↓	100.00	95.00	99.19	93.00
Place Services : HTS 5.3 Standard requests for repairs and minor adaptations carried out within 20 working days (%)					
HTS supports the Council in its delivery of home adaptations in the most efficient and effective ways, whilst making the best use of resources. High performance has been maintained through the sharing of knowledge, flexibility and innovations.					
★	↓	88.67	80.00	78.43	80.00
Place Services : NI157c Processing of other applications within 8 weeks or agreed timescale (%)					
The Development Management Team continues to prioritises all types of applications in line with statutory deadlines. In this quarter, 39 'other' applications were determined within 8 weeks, and 8 were determined within an agreed timescale.					

Section Five: Improvement Action Plans

The Council and HTS (Property & Environment) Ltd monitors all performance indicators which have been subject to an Improvement Action Plan (IAP) during the past 12 months. The table below illustrates how the indicators subject to an IAP have performed over time.

All performance indicators are reported as red, blue and green in line with the Council performance monitoring.

Quarterly Performance Indicator	QTR ended 30/06/2017	QTR ended 30/09/2017	QTR ended 31/12/2017	QTR ended 31/03/2018	QTR ended 30/06/2018
... CS25q % of customer complaints responded to within target time					
... BF005 Average days to process new claims					
... HTS 2.1b Routine cleaning of streets (NI195) Detritus to Grade A standard (Wave)					
... BV008 Invoices paid within 30 days (%)					
... BV012 Average number of working days / shifts lost to sickness and absence					
... BV082ai Household waste recycled (%)					
Number of Red Quarterly Indicators	2	2	1	3	1

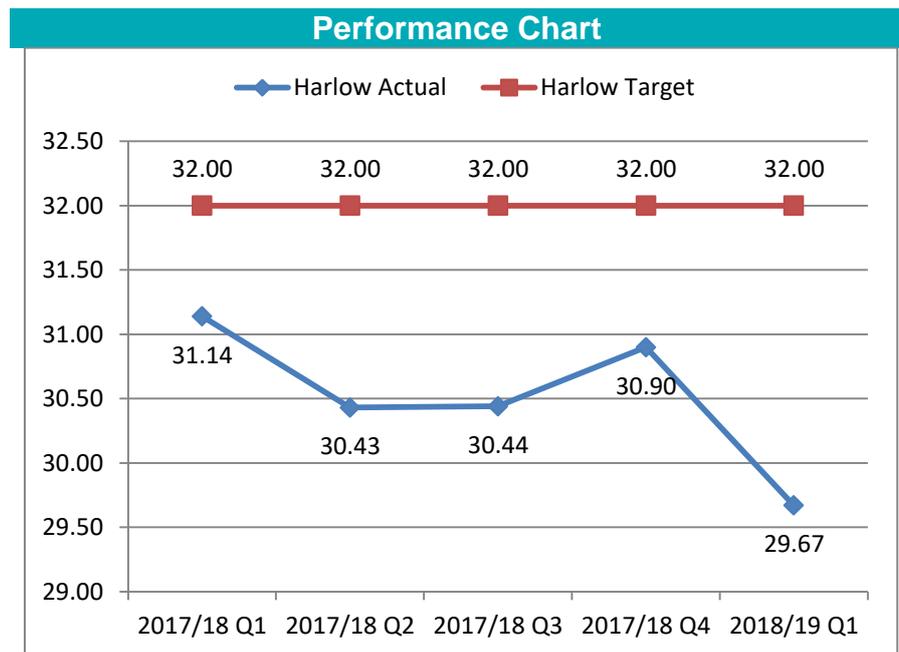
Improvement Action Plan

Reporting Period Ended: 30/06/2018

Performance Indicator
BV082ai Household waste recycled (%)

Performance					
	to 30/06/17	to 30/09/17	to 31/12/17	to 31/03/18	to 30/06/18
Harlow Actual	31.14	30.43	30.44	30.90	29.67
Harlow Target	32.00	32.00	32.00	32.00	32.00

Description
Percentage of household waste arisings which have been sent by the Authority for recycling



Direction of Travel

What is the performance situation?

The figures are based on the available data which only includes data for April 2018. The data for May and June 2018 are not yet available due to Essex County Council experiencing issues with their new reporting system, which has caused a delay in the information being received by the Council. Therefore, the data has yet to be validated.

What practical steps are being taken to improve?

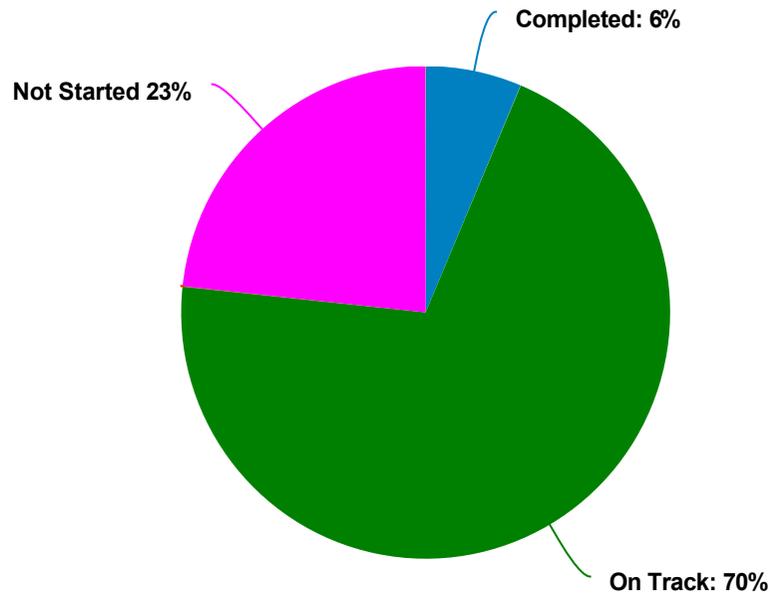
Officers continue to chase Essex County Council for the final data.

Section Six: Key Corporate and Financial Risks

Risk Owner	Inherent Likelihood	Inherent Impact	Controls Already in Place	Residual Likelihood	Residual Impact	Residual Risk Score	Residual Risk Indicator	DoT	Foreseeable Likelihood	Foreseeable Impact	Foreseeable Risk Score	Additional actions to mitigate risk	Last Reviewed
CR03 - Lack of Suitable Housing Mix													
IF : If the town lacks a suitable housing mix													
THEN : Then it will not attract or retain residents													
BACKGROUND : The town requires a suitable housing mix to attract new and retain existing residents for an evolving and sustainable community. Supply must be balanced with demand and housing need, taking into account National Housing and Planning policies. As part of that mix, housing for local people that is genuinely affordable remains a high priority for the Council.													
Bloomer, Graeme	Likely (4)	Major (4)	Duty to cooperate discussions. Housing studies including joint ones to support the Local Plan.	Likely (4)	Major (4)	21	▲	➔	Moderate (3)	Major (4)	18	Implement Local Development Plan. Pursue housing grant opportunities as they arise. Set up of a council housing and regeneration company. Direct delivery of council housing. Draft Local Plan submission to Cabinet June 2018.	30/06/2018

Section Seven: Progress in delivering the Corporate Plan

The Corporate Plan sets out the goals the Council needs to complete in order to deliver its corporate priorities and principles. Below is an update of how well the Council is doing in delivering its Corporate Plan.



The position of the Corporate Milestones as at 30 June 2018 are broken down as follows:

6% (15 out of 236) of the milestones have been successfully completed;

70% (166 out 236) of the milestones have started and are on track;

23% (55 out of 236) of the milestones have not started as the due dates are in the future.

There were no milestones significantly off target, requiring further action, cancelled or suspended.

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: HOUSING REVENUE ACCOUNT, QUARTER 1
FINANCE REPORT 2018/19

PORTFOLIO HOLDERS: COUNCILLOR MIKE DANVERS, PORTFOLIO
HOLDER FOR RESOURCES

COUNCILLOR MARK WILKINSON, PORTFOLIO
HOLDER FOR HOUSING

LEAD OFFICERS: SIMON FREEMAN, HEAD OF FINANCE
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ANDREW MURRAY, HEAD OF HOUSING
(01279) 446676

CONTRIBUTING OFFICERS: ANDREW SMITH, FINANCE MANAGER
(01279) 446212

ALISON CURTIS, SENIOR SERVICE
ACCOUNTANT (01279) 446211

This is not a Key Decision

It is on the Forward Plan as Decision Number I008564

The decision is not subject to Call-in Procedures for the following reason:

The recommendations are within the scope of the budget which has been approved by Full Council.

This decision will affect no ward specifically.

RECOMMENDED that Cabinet:

A Notes:

- i) An unfavourable variation against the approved Housing Revenue Account (HRA) operational/controllable budget of £956,000 representing 1.8 percent of the gross HRA budget.
- ii) An unfavourable non-operational variance of £4,104,000 representing 7.72 percent of gross HRA budget which includes adjustments to capital programme financing as a result of the carryovers from 2017/18 and other adjustments.

B Notes the forecast balances at 31 March 2019, of £5,304,000 in respect of the HRA and nil in respect of the Major Repairs Reserve (MRR).

REASON FOR DECISION

- A** To ensure that Senior Management Board reviews performance against the approved HRA Business Plan and acknowledges the operational variations in light of the challenges the Council may face in this financial year and future years.

BACKGROUND

1. This report sets out the Council's financial performance against the agreed 2018/19 HRA Budget and provides an indication of the outturn projection as at 31 March 2019.
2. The Council approved a minimum revenue balance of £4,000,000 in 2018/19, £1,500,000 of which is held as a provision against any additional expenditure required as a result of the Grenfell Tower Public Inquiry. The Inquiry is currently on-going and a final report is not expected in 2018/19.
3. The 2018/19 HRA original budget estimate anticipated a working balance on the HRA of £4,755,000 at 31 March 2019.
4. The carryovers to 2018/19 in the housing capital programme total £5,071,000 including external works, fire safety, electrical upgrades and HTS (Property and Environment) Ltd (HTS) schemes. This work will be funded by an increase in the revenue contribution from the HRA.
5. At 1 April 2018 the working balance on the HRA was £14,104,000 (original estimate £8,272,000). The forecast HRA balance at 31 March 2019 is £5,304,000.

ISSUES/PROPOSALS

Variances

6. The projected operational variance for 2018/19 is showing a £956,000 overspend, the key variations are detailed below with a more detailed analysis shown at Appendix A:
 - a) Whilst dwelling rents are currently below the approved budget there is improvement in respect of the level of void dwellings when compared with the anticipated void numbers projected at the time of budget setting. The position remains under review and will be considered alongside the budget setting for 2019/20 and the refresh of the 30 year business plan later in the year; and
 - b) An unfavourable variance of £156,000 in respect garage income due to the number of void garages held. Unfortunately, the trend has increased over the last two to three years in terms of demand for

garages in Harlow. Records indicate there is higher demand in some areas than others which requires careful management. The Garage Strategy and Improvement Plan identifies priorities for disposal, improvement, and management aligned to the Council's regeneration priorities. A review of the Garage Strategy and Improvement Plan is undertaken annually aligned with the level of Housing Revenue Account Business Plan resources.

7. At 31 March 2018 there was a nil balance on the MRR. The estimated depreciation charge for 2018/19 following a review is anticipated to be £12,320,000 (original estimate £11,439,000) and is expected to be used in full to support the Housing Capital Programme.
8. The regulations require that the MRR balance can be used either to finance the Capital Programme or to repay housing debt. The HRA Business Plan 2017-47, approved by Full Council in February 2018, states that external borrowing will be renewed on maturity in March 2026 and hence the MRR is being applied to finance capital expenditure.

HRA Balances 2018/19

9. The original estimate for 2018/19 approved by Full Council in February 2018 anticipated an opening balance of £8,272,000 and working balance at 31 March 2019 of £4,755,000. Following closure of the 2017/18 accounts the working balance brought forward was £14,104,000, as noted by Cabinet on 19 July 2018. The increased balance was due to an under spend in the Housing Capital Programme in 2017/18 and therefore reduction in the direct revenue contribution required.
10. The HRA in 2018/19 will be impacted by the additional direct revenue contribution required to fund the 2017/18 carryovers and additional expenditure incurred by the final settlement with Kier Harlow, plus reprioritisation of the capital programme. For details please refer to the Capital Programmes, Quarter 1 Finance Report 2018/19 which is item 13 on the agenda for this meeting.

Table 1 – HRA Projected Working Balance at 31 March 2019

	£'000
Original Estimated balance in hand 1 April 2018 (as at February 2018)	8,272
Increase in balance in hand reported at 17/18 Outturn	5,832
Actual balance in hand 1 April 2018	14,104
i) Original estimate deficit	(-)3,518
ii) Revenue Carryovers 2017/18	(-)222
iii) Capital Carryovers 2017/18	(-)5,071
Other service adjustments	11
Projected Working Balance at 31 March 2019	5,304

11. The anticipated Working Balance at 31 March 2019 is £5,304,000, against an estimate of £4,755,000, £549,000 higher due to year end carryovers and subsequent capital works identified, offset by additional funding from unapplied capital receipts and grant income.

Significant Risks/Opportunities

12. The following risks (all of which are subject to review) have been identified which could affect the HRA Business Plan:

- a) The outcome of the Grenfell Tower Public Inquiry on landlords across the country;
- b) The outcome and communication of outstanding national housing policy imperatives relating to the sale of larger properties in support of Registered Social Landlord Right to Buy (RTB) proposals, and future rental income legislative parameters. In July 2015, the Government announced a legislative requirement for social landlords to decrease rents annually by one percent over four financial years (2016/17 – 2019/20). This challenged councils to make efficiencies in order to deliver sustainable services. It has now been announced that the uplift over the following five financial years will be CPI +1 percent;
- c) HTS Pension adjustment and re-valuation implications if appropriate;
- d) Welfare Reform: the Government's reduction in benefits to non-working families may have an adverse impact on tenants' ability to pay rent. Additionally, the County Council has reduced Housing Related Support to the Council;
- e) Continuing development of a Capital Programme to deliver decent homes in partnership with contractors, and the need to deal with unexpected outcomes, such as fire safety and regulation, especially in light of constraints arising from the reduction in rental income from 2016/17;
- f) The Homeless Reduction Act 2017, which was implemented from April 2018, places a legal duty on Councils to take steps to prevent families from becoming homeless, with a key element being to intervene to prevent homelessness happening in the first place, rather than focusing on accommodating people who are already homeless. This will have financial implications for the Council in terms of the increased new duties that it will be expected to provide; and
- g) The Government has introduced new plans to fix the 'broken housing market and build more homes across England'. This includes measures to:

- i) Reduce the obstacles to house building and help local authorities, developers and small and medium enterprise builders build the homes Britain needs; and
- ii) Improve affordability and protections for renters and home purchasers. Amongst many headlines, there is a view that councils' existing/new 'Housing Companies' will be subject to RTB processes. Consultation on the White Paper closed 5 May 2017. A budget housing announcement is anticipated.

IMPLICATIONS

Place (Includes Sustainability)

None specific.

Author: Jane Greer, Head of Community Wellbeing on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

As contained within the report.

Author: Simon Freeman, Head of Finance

Housing

As contained within the report.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

None specific.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

None specific

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

Appendix A – HRA Operational Variances, Period 3

Appendix B – Housing Revenue Account Budget Summary 2018/19, Period 3

Background Papers

CIPFA Code of Practice 2012/13.

CIPFA Financial Advisory Network paper "HRA Depreciation, Impairment and Valuation Losses (England)".

Glossary of terms/abbreviations used

CPI – Consumer Price Index

HRA – Housing Revenue Account

HTS – HTS (Property and Environment) Ltd
MRR – Major Repairs Reserve
RTB – Right to Buy

Appendix A

HRA Operational Variances				Main contributing Factors to Variations
Item	Adverse £000's	Favourable £000's	Net £000's	
General Management	374		374	The TUPE of HTS Technical Services Team occurred on 5 March 2018. The additional salary costs (Revenue) of Technical Services Team is offset by a reduction in the Housing Capital Programme. In addition there are vacancy savings on salaries due to delays in recruitment and staff re-organisation. There are forecasted additional direct costs of the Technical Services Team.
Special Management	13		13	Increased cost of supporting people work from the general fund to HRA.
Charges for Services and Facilities	52		52	Net cost of communal heating offset by additional management and other income.
Dwelling Rents	256		256	Rental income is lower than forecast with voids performing better than anticipated.
Garage Rents	156		156	Lower income from garage rents due to a higher level of void garages.
Other minor variances	105		105	
Deficit/ (Surplus) for year	<u>956</u>		<u>956</u>	Net adverse

Non Operational Variances				
Item	Adverse £000's	Favourable £000's	Net £000's	
Direct Revenue Financing of Capital Expenditure	3,223		3,223	Increased funding required due to carryovers from 2017/18 in the Housing Capital Programme and other programme adjustments.
Major Repairs Reserve (depreciation)	881		881	
<i>Variance</i>	<u>4,104</u>		<u>4,104</u>	Net adverse

HRA Operational Variance	£ 956,000
HRA Non Operational Variance	£4,104,000
TOTAL Projected in year HRA Deficit	£5,060,000

Appendix B

	2018/19	2018/19	2018/19	Variance
	Original	Current	Forecast	Current
	Estimate	Estimate*	Outturn	Estimate to
	£	£	£	Forecast
				Outturn
				£
<u>EXPENDITURE</u>				
General Management	11,148,750	11,336,751	11,814,541	477,790
Special Management	7,350,377	7,353,273	7,367,524	14,251
Repairs	10,090,160	10,121,085	10,121,085	0
Rent, Rates, Taxes	35,000	35,000	35,000	0
Provision for Bad & Doubtful Debts	300,000	300,000	300,000	0
Supporting People Transitional Arrangements	5,300	5,300	5,300	0
Major Repairs Reserve	11,439,000	11,439,000	12,320,000	881,000
Debt Management Expenses	16,520	16,520	16,520	0
Interest Charges	6,669,000	6,669,000	6,669,000	0
Direct Revenue Financing of Capital Programme	5,914,000	5,914,000	9,137,000	3,223,000
	52,968,108	53,189,929	57,785,970	4,596,041
<u>INCOME</u>				
Dwelling Rents	43,175,000	43,175,000	42,919,422	255,578
Garage Rents	1,142,000	1,142,000	985,551	156,449
Other Rents	65,150	65,150	65,150	0
Charges for Services & Facilities	5,005,995	5,005,995	4,954,017	51,978
Interest Receivable	62,075	62,075	62,075	0
	49,450,220	49,450,220	48,986,215	464,006
Balance in hand at 1 April	8,272,415	14,103,542	14,103,542	0
Surplus / (Deficit) for year	(-3,517,888)	(-3,739,709)	(-8,799,755)	(-5,060,047)
Balance in hand at 31 March	4,754,527	10,363,833	5,303,787	5,060,047

*Current Estimate 2018/19 includes revenue carryovers from 2017/18, £222,000. Cabinet 19 July noted actual balance in hand at 1 April 2018.

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: CAPITAL PROGRAMMES, QUARTER 1 FINANCE REPORT 2018/19

PORTFOLIO HOLDERS: COUNCILLOR MIKE DANVERS, PORTFOLIO HOLDER FOR RESOURCES
COUNCILLOR MARK WILKINSON, PORTFOLIO HOLDER FOR HOUSING

LEAD OFFICERS: SIMON FREEMAN, HEAD OF FINANCE (01279) 446228
ANDREW MURRAY, HEAD OF HOUSING (01279) 6676

This is not a Key Decision

It is on the Forward Plan as Decision Number I008565

The decision is not subject to Call-in Procedures for the following reason:

The recommendations are within the scope of the budget which has been approved by Full Council.

This decision will affect no ward specifically.

RECOMMENDED that Cabinet:

A Notes the progress on the delivery of the Council's Housing and Non-Housing Capital Programmes as at Quarter 1 (1 July 2018) as follows:

- i) Housing Capital Programme –forecast outturn of £24,551,000 (original estimate £18,804,000).
- ii) Non- Housing Capital Programme – forecast outturn of £14,727,000 (original estimate £15,250,000).

B Approves:

- i) Additional expenditure of £11,000, from the Non-Housing Capital Programme, within the Town Park Inclusive Play scheme (approved in 2018/19) for a new footpath and footpath improvements. The additional expenditure is fully grant funded by the County Council.
- ii) A business case for the installation of new boilers and system controls at Abercrombie Playbarn, £25,000, funded from the approved Non-Housing Capital Contingency Budget.

- iii) A change to the business case to upgrade council websites (approved in February 2017). It is recognised that £40,000 of urgent works are required to upgrade the main Council website, to be funded in part from the approved budget of £20,000.
- iv) An additional £10,000 from the Contingency budget to support the installation of new boilers and system controls at 2 and 2A Wych Elm. The current approved budget in the capital programme for this work is £15,000.
- v) A revised current budget in the Non-Housing Capital Programme of £14,727,000 in line with the carryovers, adjustments and additional funding detailed in Table 4 of the report.

REASON FOR DECISION

- A** To ensure that Senior Management Board reviews performance against the Council's approved 2018/19 Housing and Non-Housing Capital Programmes.

BACKGROUND

1. This report on the Capital Programme forms part of the suite of budget monitoring reports provided to ensure close supervision over the financial position throughout the year.
2. In February 2018, Full Council approved a Housing Capital Programme for 2017/18 totalling £18,804,000 and a Non-Housing Capital Programme totalling £15,250,000, summarised in Table 2, Column 2 and Table 5, Column 2 respectively.
3. Carryovers requested for approval at Cabinet in July 2018 in the Housing Capital Programme of £5,187,000 and Non-Housing Capital Programme of £3,996,000.

ISSUES/PROPOSALS

Asset Management Priorities

4. In 2013, the Council commenced an ambitious five year Housing Investment Programme (HIP) designed to bring all of Council owned housing up to the Government's Decent Homes Standard by 2015. This was achieved and involved the establishment of internal and external works programmes.
5. The HIP programme for 2018/19 continues the work which commenced in 2017/18 but has been revised recognising changes required to National Fire Regulation priorities, increased costs and scope in delivering local priorities which includes district heating replacement programmes, energy efficiency

programmes, and council house building within the reducing resources available.

6. In 2017/18 a review of the Council's tower block fire risk assessments confirmed that all blocks were inherently safe. The budget for 2018/19 includes schemes which respond to the conclusions of the Hackitt Report and also provides funding for fire risk works as they are identified.
7. The budget for Fire Safety in Tower Blocks is £1,746,000. This will enable the Town's tower blocks to be surveyed to identify and ad-hoc fire stopping works required. It will also enable a pilot scheme to be undertaken at Willowfield Tower to install a pumping station. Due to the ad-hoc nature of the work being carried out, the budget may not outturn in full in 2018/19, requiring a possible carryover of part of the budget to 2019/20.
8. The tragic fire at Grenfell Tower in North Kensington in June 2017 focussed national attention on fire safety and regulation in tower blocks. The Public Inquiry is still in progress and is anticipated to report in 2018. Whilst the Hackitt Review into Building Regulations and Fire Safety was published in May 2018, the Government response is still awaited. This response will require analysis and a response from the Council.
9. The previous external works programme which was commenced in 2017 is due to be completed by October 2018. It is anticipated, however, that additional costs will be incurred due to the requirement to provide additional works under health and safety. This cost has not yet been quantified. The Council, as part of its revised HIP is in the process of procuring targeted external works to a number of estates in Harlow. This includes The Hides and The Hornbeams.
10. As part of the Council's desire to build new council houses, increase the number of bed spaces available for temporary accommodation, and ensure the units remain compliant, a programme of work is in hand to deliver up to 11 additional council housing units at Sumners Farm Close, Partridge Court, Hare Street Springs and Collins Meadow. The work will be funded from the HRA revenue contribution and from retained pooling receipts.
11. During 2018/19 planning for the further development of council housing is taking place with a view to new properties with three being built at The Readings and 16 at Bushey Croft from 2019/20.
12. The Council received a grant to tackle rough sleepers at Harlow. As part of the action plan, the refurbishment of 1 and 2 Bromley Cottages as 'move on' temporary accommodation in partnership with Streets2Homes is anticipated.

Heating Systems Replacement

13. The Council commenced a five year District Heating Replacement Programme in 2016/17. To date Sumners Farm Close and Fenner Brockway have been completed. It is programmed for further new schemes to be included in the

2018/19 programme at Morris House, Latton Hall Close, Tylney Croft, Latton House, The Wayre and Toddbrook.

14. In 2017/18 Cabinet approved a contract for HTS (Property and Environment) Ltd (HTS) to deliver the replacement of four District Heating Schemes. The original programme of installation was delayed until after the winter season and the budget of £1,412,000 carried forward to 2018/19. The anticipated outturn is £1,125,000 with the difference being used to support the electrical works under the Compliance budget. It is expected the remaining phases of the District/Communal Heating System Replacement Programme will be completed by 2020/21.
15. Alongside the Heating System Replacement Programme, urgent works were put in place to install new gas 'wet' system boilers and heating systems and to decommission the associated air ducts in tower blocks. This work affects five tower blocks (Stort, Moor, Edmund, Willowfield and Nicholls). The replacement programme commenced in 2017/18 and continues in 2018/19 with a budget of £1,053,000. The work affects 248 individual properties (140 tenanted, 108 leaseholders), and includes consultation with residents. Full completion of the project is currently forecasted for March 2019 and is being delivered within existing procurement arrangements.
16. On Cabinet 19 July 2018 approved a tender of £2,360,000 to enable the replacement of communal boilers during the summer months in Sheltered schemes, as part of the Heating System Replacement programme, (original budget £1,700,000).

Housing ICT

17. Each year Cabinet approves a programme of Housing IT enhancements as part of the wider housing capital programme. This has included replacement modules for Asset Management, Responsive Repairs, as well as upgrades and interfaces to and from the Orchard Housing Management system. The allocated budget is £463,000 plus a requested carryover of £153,000 focuses on improving and enhancing Homelessness Management together with customer access.

Housing Capital Programme 2018/19

18. The Housing Capital Programme in 2018/19 will continue to deliver the investment priorities for the Council's housing assets outlined in the approved Housing Revenue Account (HRA) Business Plan 2017-2047. The Council will continue to monitor contract performance and delivery making adjustments to the programme as the year proceeds.
19. Table 1 below provides a summary of the approved Housing Capital Programme. It includes carry forwards from 2017/18 and is the current projection of expenditure to 31 March 2019.

Table 1 – Housing Capital Programme as at Period 3

2018-19 Budget Stage	£000s	Date Approved
Original budget	18,804	1 Feb 18
Carryovers from 2017/18	5,187	19 July 18
Garage carryover to General Fund	(-) 116	Para 31
	23,875	
Communal Boiler	660	Para 14
Other adjustments	16	
Forecast Outturn	24,551	

20. Table 2 below provides a more detailed view of the approved Housing Capital Programme. As a result of the current forecast it is expected that Direct Revenue Financing required from the HRA will be £9,137,000.

Table 2 – Housing Capital Programme 2018/19

	Original Budget	Current Budget with carryovers	Projected Outturn	Variance Current Budget (Projected Outturn £000)	Report Ref.
	£'000	£'000	£'000	£000	
Expenditure					
Internal Works	5,132	5,155	5,322	167	21i
Windows & Doors	100	266	370	104	21i
External Works	3,732	7,525	7,705	180	21iii
Damp & Structural Works	200	200	200	0	
Other Works (Asbestos, Garages, Lifts)	1,400	1,511	1,448	(-)63	Para 32
Electrical	500	797	1,096	299	20iv
Upgrades & Fire Safety					
Fire Safety & Regulation – SE	1,053	1,053	1,053	0	
Ducts removal					
Fire Safety & Regulation – Other work	1,590	1,746	1,746	0	
Energy Efficiency	3,312	3,504	3,815	311	Para 14/21iv
Disabled Adaptations	900	1,079	1,079	0	
Surveyors Fees	422	422	0	(-)422	21ii
Bromley Cottages	0	0	100	100	Para 12
Housing IT Development	463	617	617	0	

	Original Budget	Current Budget with carryovers	Projected Outturn	Variance Current Budget (Projected Outturn £000)	Report Ref.
	£'000	£'000	£'000		
TOTAL EXPENDITURE	18,804	23,875	24,551	676	
Financed by:					
Capital Receipts:	(-)1,217	(-)1,217	(-)1,217	0	
Right to Buy Retained Receipts	(-)234	(-)234	(-)242	8	
Unapplied Receipts	0	(-)1,535	(-)1,535	0	
Major Repairs Reserve	(-)11,439	(-)12,320	(-)12,320	0	
Grant	0	0	(-)100	100	
Direct Revenue Contribution	(-)5,914	(-)8,569	(-)9,137	568	
TOTAL FINANCING	(-)18,804	(-)23,875	(-)24,551	676	

21. The variances reported in Table 2 are as a result of the following:

- a) The final settlement with Kier Harlow Ltd resulted in additional invoicing for internal works and windows and doors in excess of the creditors included in the 2017/18 Capital Programme.
- b) The establishment of a Technical Services Team within the HRA is funded in part from a reduction in surveyor's fees. Costs effectively transfer from capital to revenue.
- c) Urgent external works at Mill House and Hookfield require an additional budget of £180,000 which will be recouped in part from leasehold contributions to the work being undertaken.
- d) Increase in work required under the HTS Compliance budget offset by a reduction in the cost of Communal Boilers undertaken by HTS.

22. From February 1 2017, HTS (Property and Environment) Ltd, a subsidiary company of the Council, were contracted to undertake a range of housing related works including compliance, energy and efficiency, windows and doors, garage and disabled facility works to council dwellings.

23. The work programme in 2017/18 was realigned to HTS' mobilisation plans and expected delivery times on the first of a three year programme. This particularly affected energy efficiency/communal boilers; £1,412,000 from the energy efficiency budget was therefore deferred to 2018/19 (Cabinet 25 January 2018). The annual contract value for 2018/19 is £5,850,000 which with carryovers of

£822,000 and changes to works planned, results in a budget for 2018/19 of £8,319,000 Details of the 2018/19 budget are reported in Table 3 below.

Table 3 – HTS (Property & Environment) Ltd. Work Packages 2018/19

Work Packages	Original Contract	Carryovers	In year adjustments	Current Contract
	£'000	£'000	£'000	£'000
Internals	3,380	0	0	3,380
Lifts	620	305	(-)925	0
Aids & Adaptations	900	0		900
Disabled Facilities	0	179	0	179
Compliance	400	57	300	757
Contingency	100	27	0	127
Windows and Doors	100	166	0	266
Fire Doors	100	0	0	100
Communal Boilers	0	1,474	(-)349	1,125
Energy Efficiency	200	130	0	330
Garages - General Fund	0	201	0	201
Garage Doors	50	0	0	50
Bromley Cottages	0	0	100	100
Property Conversions	0	0	304	304
Sumners Farm Close	0	0	500	500
TOTAL	5,850	2,539	(-)70	8,319

24. The Housing Capital Programme delivered 48,200 new components such as windows, doors, kitchens, bathrooms and boilers in dwellings between 1 April 2013 and 31 March 2018, with a further 2,787 planned by 31 March 2019.
25. The Council only pays for completed work when it is signed off by an independent clerk of works. There is a time lag, however, with this invoicing due to the necessary requirement that works can only be invoiced once they are satisfactorily completed and all associated paperwork/certification is compiled and formally handed over. The Council is committed to prompt payment once these processes have been completed.
26. The original estimate approved by Council 1 February 2018 assumes fifty 'Right to Buy' (RTB) sales in 2018/19. Eleven RTB disposals had been completed by 1 July 2018.

27. At 31 March 2018 there was a nil balance on the Major Repairs Reserve (MRR). Under proper accounting practice, the charge to the HRA for depreciation is projected to be £12,320,000 (original estimate £11,439,000) in 2018/19. At year end this is transferred to the MRR which, in turn, is utilised to support the Housing Capital Programme.

Non-Housing Capital Programme 2018/19

28. Full Council on 1 February 2018 approved a Non-Housing Capital Programme of £15,250,000, which included major works at the Enterprise Zone and Prentice Place, as shown in Table 4 below:

Table 4 – Non Housing Capital Programme as at Period 3

2017-18 Budget Stage	£000s	Date Approved
Original budget (Core)	3,946	1 Feb 18
Enterprise Zone	8,031	
Prentice Place	3,273	
Approved budget	15,250	
Carryovers 2017/18	3,996	19 July 18
GF Garage carryover 2017/18	116	19 July 18, Para 31
Other budget adjustments	478	Paras 30 31,32 Apps A5, 9, 10
Current Budget	19,840	
Carryovers	(-)430	Apps A11, 13
Enterprise Zone outturn 2018/19	(-)4,412	
Other forecast adjustments	(-)271	
Projected Outturn	14,727	
Variance to revised current budget	5,113	

29. Further details of expenditure relating to projects are contained within Annex A to this report, together with financing implications related to these.

30. Estimated capital receipts from asset disposals in 2018/19 total £624,000 (original estimate £824,000) due to the move towards council house building the land which was expected to be disposed of may now be used for house building. In addition overage is due from the sale of land at Ram Gorse. However, the timing and value of payments is dependent on the conclusion of negotiations.

31. The Council has been awarded a Disabled Facilities Grant for 2018/19 of £740,000 from the Ministry of Housing, Communities and Local Government. This increases the budget available by £205,000. However, expenditure is determined by demand and is currently forecast at £466,000, (Original estimate of £535,000).

32. The carryovers approved in the Housing Capital Programme included an element of carryover for General Fund garages of £116,000 and a further adjustment from the current year budget (£47,000) following a revised allocation

of costs relating to garages in the General Fund. The forecast outturn for garages in the non-housing programme is £405,000 and is funded by revenue contribution from the General Fund.

33. Additions to the current budget also include the supplementary budget for the Playhouse of £80,475 agreed by Cabinet 19 July 2018 and the grant funding made available to the Town Park Inclusive Play Scheme.
34. Estimated internal borrowing to support the core programme in 2018/19 is £2,871,000 (Original estimate £2,010,000). The increase is due to approved capital and revenue carryovers of £4,112,000 from 2017/18, plus budget amendments in 2018/19. In addition there is estimated borrowing of £6,523,000 in line with the current forecast of expenditure in 2018/19 for the Enterprise Zone and £1,754,000 to complete work at Prentice Place.
35. Details of the Non-Housing Capital Programme expenditure and financing are given in Table 5 below.

Table 5 – Non-Housing Capital Programme 2018/19

	Original Budget	Current Budget	Projected Outturn	Variance Forecast Outturn to Current Budget	
	£000s	£000s	£000s	£000s	
Expenditure:					
Place Services:	2,630	3,916	3,225	(-)691	A8-14
Governance	15	15	0	(-)15	
Finance	236	236	236	0	A4
Community Wellbeing:	1,065	1,388	1,393	5	A5-7
	3,946	5,555	4,834	(-)701	
Prentice Place	3,273	3,350	3,350	0	A15
Enterprise Zone	8,031	10,935	6,523	(-)4,412	A16
	11,304	14,285	9,873	(-)4,412	
Total expenditure	15,250	19,840	14,727	(-)5,113	
Financed by:					
Capital Receipts - Right To Buy	(-)205	(-)205	(-)205	0	
Asset Disposals	(-)824	(-)624	(-)624	0	
Earmarked Resources	(-)100	(-)143	(-)143	0	
Direct Revenue Contribution	(-)242	(-)520	(-)520	0	

Disabled Facilities Grant- Strategic Housing	(-)535	(-)740	(-)466	274	
Renovation Loans etc.	(-)30	(-)25	(-)25	0	
Prentice Place capital receipt	(-)1,519	(-)1,595	(-)1,595	0	
Prentice Place Borrowing	(-)1,755	(-)1,755	(-)1,755	0	
Enterprise Zone Internal Borrowing	(-)8,030	(-)10,935	(-)6,523	4,412	
Prudential Borrowing	(-)2,010	(-)3,298	(-)2,871	427	
Total Financing:	(-)15,250	(-)19,840	(-)14,727	5,113	

Impact of Prudential Borrowing	£000s
Borrowing to support Non Housing Capital Programme as at 31 March 2018	9,535
New borrowing to finance shortfall in Non Housing Capital Programme, 2018/19	11,149
Borrowing to support Non Housing Capital Programme as at 31 March 2019	20,684

Risks and Opportunities

36. There is national concern about fire safety and regulation in tower blocks in the wake of the Grenfell Tower fire. The outcomes from the Inquiry are likely to have far reaching consequences, with a potential requirement to totally recast the housing capital programme of works during 2018/19 or 2019/20.
37. Key risks in the delivery of the HIP are the performance of contractors and the Council's capacity to deliver a housing capital programme revised in light of changing priorities and funding available from the HRA. The Council's management of the appointed contractor for these works has been subject to an Internal Audit which reported a 'Substantial Assurance' outcome in December 2016.
38. Housing Capital funding is affected by reducing rents until 2020.
39. Key risks in the Non-Housing Capital Programme are centred on the implications for the Asset Management Plan and for future capital budgets and income generation following the completion of the Stock Condition Surveys.
40. An additional risk in the Non-Housing Capital Programme is the cost of removing asbestos as works are undertaken.

IMPLICATIONS

Place (Includes Sustainability)

As contained within the report.

Author: Jane Greer, Head of Community Wellbeing on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

As contained within the report.

Author: Simon Freeman, Head of Finance

Housing

As contained within the report.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

None specific.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

None specific.

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

Annex A – Capital Programmes Quarter 1 Finance Report, 2018/19

Background Papers

None.

Glossary of terms/abbreviations used

HIP – Housing Investment Programme

HRA – Housing Revenue Account

HTS – HTS (Property and Environment) Ltd

MRR – Major Repairs Reserve

RTB – Right to Buy

ANNEX A

CAPITAL PROGRAMMES QUARTER 1 FINANCE REPORT, 2018/19 Update on the Status of Capital Projects

Housing Capital Programme

- A1. Expenditure on the Mulalley External Works Programme (budget carried over from 2017-18) is low at the end June 2018, however, this does not present cause for concern given the contractual payment mechanism that is associated with three large schemes within the Task Order (Longbanks, Moorfields and Northbrooks which have a combined value of c.£2.8m). Payments on these schemes only become due once all elements of works to an entire block are accepted as complete and handed over.

The original construction phase programmes for these three schemes had programme start dates occurring in November and December 2017 with programmed completion dates in July and August 2018. As such, low expenditure as at the end of June 2018 was expected. In addition, we foresee that some level of delay will be encountered on each of these schemes with Moorfields now likely to complete early October. This will impact on spend against programme, with further reduced expenditure being experienced in the short term. This will not affect the long term financial out-turn of the programme within the financial year 2018-19. A cautious approach to assumptions and forecasting is being adopted, but currently it is expected that the programme will be delivered within the budget allocation.

Procurement of new schemes in the 2018-19 External Works Programme is underway. Tender, decision making and consultation periods associated with the procurement of this work, mean that significant spend is not anticipated until after October 2018, with re-forecasting, if required, occurring at the end of September 2018.

A2. **ANNUAL SERVICE CHARGE (ASC) Fixed Prices**

Works to the ASC fixed prices for 2018/19 commenced on the 1 April 2018. The number of units completed at end of June is shown in the table below. Performance shows kitchens and heating ahead of target. The HTS fixed prices budget is fully committed and on track to outturn in full by year end.

Element	Total Annual units agreed	Agreed Total ASC to date	Completed Units to date	Total Value to date	Variance to Profiled Budget
Kitchens	84	£409,728	22	£104,184	£1,752
Re-Wires	45	£107,472	10	£23,187	(-)£3,681
Boiler/ Heating	142	£439,580	54	£162,295	£52,400
Total	271	£956,780	86	£289,667	£50,472

Non-Housing Capital Programme

- A3. The completed stock condition survey will enable a 20 year programme to be drawn up covering the development or disposal of commercial and municipal assets and will help shape and inform the future capital investment requirements for the non-housing asset portfolio.
- A4. IT work in 2018/19 will include the upgrade of the telephony system in the Civic Centre.
- A5. In Community Wellbeing schemes in 2018/19 include the on-going work to refurbish the Playhouse totalling £434,000, work to 21 The Rows (£250,000), schemes in the Town Park (£390,000) and work to the Stow in front of the Moot House (£250,000).
- A6. Included in the Town Park Schemes is the Inclusive Play Scheme approved in 2018/19 with a budget of £200,000 which has secured an additional £11,000 from Essex County Council (ECC) for a new footpath and footpath improvements. This will assist with the creation of the Inclusive Play facility in the Town Park.
- A7. A new van for the Community Rangers is included in the programme with a budget of £30,000.
- A8. Schemes originally approved at the Latton Bush Centre total £361,000 plus a carryover of £173,000 to support the roofing work. In addition there are schemes to replace one of the two boilers (£95,000) and asbestos removal work (£50,000).
- A9. Home Repairs Assistance Loans (estimate £15,000) are made available by the Council to owner occupiers for work to improve their homes.
- A10. The Council's Commercial portfolio in 2018/19 includes work to various properties including Ladyshot Pavilion (£60,000), Barbara Castle Health Centre (£65,000), Leah Manning Centre (£40,000) and work at the Stow and Bush Fair (£391,000).

Replacement of the boilers and control system at Abercrombie Playbarn (£25,000) is required in order to replace the obsolete and inefficient gas boiler. This will mean that there is reliable heating and hot water to the building and will also reduce energy usage and CO2 emissions.

- A11. Other works in Place Services include improvements to the Public Realm in the Town Centre (£205,000), work to Abercrombie Playbarn Roofing (£40,000) and refurbishment of the toilets by Pets Corner in the Town Park (£72,000). Work also continues on the restoration of Oakwood Pond (£15,000).

Renewal of the existing obsolete and inefficient gas boilers providing both central heating and hot water to Sumners Leisure Centre is estimated to

outturn at £78,000, funded from an approved budget of £58,000 and a tenant contribution of £20,000.

- A12. Pending a bid by Science Alive to Heritage Lottery Fund (HLF) for major works to the Museum of Harlow, which may require some level of match funding; health and safety works will be carried out (£20,000) in 2018/19 and the remaining budget carried over (£180,000).
- A13. A budget for Energy Performance Certificates (£20,000) will enable capital works to upgrade commercial properties to meet the minimum E EPC rating in line with the Energy Act (2011) and EU legislation which came into force 1 April 2018. This will increase the sustainability of the commercial portfolio as the regulations will apply from the granting or renewing of leases to tenants. By 2023 properties leased with less than an E rating will be subject to a penalty payment.
- A14. The budget for Civic Centre works is currently reported as a carryover to 2019/20 to enable a programme of work to be drawn up that will achieve value for money for improvements to the building.
- A15. The Regeneration of Prentice Place was approved by Cabinet 31 March 2016 and a business case included in the Non Housing Capital Programme 2017/18. A carryover from 2017/18 of £76,000 will bring the estimated spend for 2018/19 to £3,350,000 financed in part from ring fenced capital receipts (£1,595,000).
- A16. The Council is undertaking a major project to construct premises on the Enterprise Zone with expenditure of £4.195m in 2017/18 and a current estimate of £6.5m 2018/19. The project from 2018/19 will be funded from borrowing. Income will be generated through future business rate receipts.

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: ANNUAL TREASURY MANAGEMENT REPORT 2017/18

PORTFOLIO HOLDER: COUNCILLOR MIKE DANVERS, PORTFOLIO HOLDER FOR RESOURCES

LEAD OFFICER: SIMON FREEMAN, HEAD OF FINANCE (01279) 446228

CONTRIBUTING OFFICER: ANDREW SMITH, FINANCE MANAGER (01279) 446212

This is not a Key Decision

It is on the Forward Plan as Decision Number I008566

The decision is not subject to Call-in Procedures for the following reason:

The decision stands as a recommendation to Full Council.

This decision will affect no ward specifically.

RECOMMENDED that Cabinet:

- A** Notes the annual Treasury Management Report for 2017/18 (attached as Appendix A to the report), including that the Council operated within the Treasury Management Strategy Statement during 2017/18, and that the report is recommended to Full Council for approval.
- B** Notes the issues that the outcome of the EU Referendum is creating and their impact on the Council's treasury management activities.

REASON FOR DECISION

- A** In complying with latest Codes of Practice, Full Council is required to receive an annual report on the prior year's treasury management functions of the Council, which should also receive review by Cabinet in advance of its presentation to Full Council.
- B** The Prudential Indicators are also required to be reported to Full Council. These are included within the annual treasury management report.

BACKGROUND

1. Treasury management is defined as: 'The management of the local authority's investments and cash flows, its banking, money market and capital market

transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.'

2. On 10 February 2010, Full Council adopted the Chartered Institute of Public Finance and Accountancy's (CIPFA's) Code of Practice on Treasury Management (as revised November 2009) – 'the Code'.
3. During 2017/18 the minimum reporting requirements were that Full Council should receive the following reports:
 - a) An annual treasury strategy in advance of the year (Full Council, 2 February 2017);
 - b) A mid-year treasury update report (Full Council, 14 December 2017);
and
 - c) An annual review following the end of the year describing the activity compared to the strategy (this report).
4. The annual report for 2017/18 has been produced in compliance with the Code and is set out in Appendix A to this report. The regulatory environment governing treasury management places onus on Councillors for the review and scrutiny of treasury management policies and activities. This report is important in that respect, as it provides details of the outturn position for treasury activities and highlights compliance with the Council's policies previously approved by Councillors.

ISSUES/PROPOSALS

5. As stewards of public funds, the Council will continue to take all practical steps to protect its investment portfolio. In this respect, emphasis remains in this order of priority: security, liquidity and yield.
6. Security is defined as 'reducing risk in order to protect the return of capital sums, particularly in relation to the Council's investments'. In practice this means placing investments with organisations which have a high quality credit rating, i.e. banks and other bodies which have a Fitch rating of A(-) and above. Local councils do not, usually, have credit ratings but are inherently safe havens for investment
7. Liquidity means 'ensuring that investments are not committed for excessive time-periods in order to facilitate the Council's cashflow requirements and to reflect the risk of not having immediate access to funds'. Councils are discouraged from investing disproportionate sums of money for long periods of time at what seem attractive rates of return.
8. Yield is 'obtaining a reasonable return on investments'. Once again 2017/18 has been a year of continued low interest rates with the Bank of England's Base Rate increasing from 0.25 percent to 0.5 percent in November 2017. The

Council has attempted to gain the best yields without compromising security and liquidity. The average rate achieved was 0.53 percent.

9. The advice from Arlingclose is that the Council must aim towards a good investment spread as this is the best defence to protect the Council from a possible capital loss. As a result, and within the overarching powers given by members in the Treasury Management Strategy, the Council held investments with the CCLA (the Local Authority property fund), a Cash-Plus Fund, Money Market Funds, local councils, and the Treasury's Debt Management Office. It ceased investments with banks through Certificates of Deposit.

IMPLICATIONS

Place (Includes Sustainability)

None specific.

Author: Jane Greer, Head of Community Wellbeing on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

As contained within the report.

Author: Simon Freeman, Head of Finance

Housing

None specific.

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Governance (Includes HR)

None specific,

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

Appendix A – Annual Treasury Management Report 2017/18

Background Papers

Treasury Management Strategy 2017/18

Glossary of terms/abbreviations used

CIPFA – Chartered Institute of Public Finance and Accountancy

HARLOW COUNCIL ANNUAL TREASURY MANAGEMENT REPORT 2017/18

Introduction

1. This report sets out the Council's outturn position in accordance with recommended practice.
2. It provides a review of external economic conditions impacting on the Council and focuses on the major issues affecting its borrowing and investments.
3. The Council uses treasury management advisors to help its decision making, keeping officers up to date with economic and more specifically market developments and providing training and support.
4. Economic background and commentary is provided by Arlingclose throughout this Report. Throughout 2017/18 interest rates have remained low and as a consequence interest earnings have been meagre.
5. The country is in the process of exiting the European Union. This has brought political and economic uncertainty.
6. As a steward of public finance, the Council will continue to take all practical steps to protect its investment portfolio. In this respect emphasis remains in this order of priority:
 - **Security:** some of the following might appear contradictory or elusive in this challenging economic environment
 - Reducing risk in order to protect the return of capital sums, particularly in relation to the Council's investments
 - The repayment of the sum invested; and / or,
 - A return equal to or higher than the prevailing rate of inflation.
 - **Liquidity:** availability of cash when needed (adequate but not excessive liquidity)
 - **Yield:** a return commensurate with the level of risk.
7. The Council's treasury management activity is underpinned by the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2011 Edition (CIPFA's TM Code) which requires it to produce annual Prudential Indicators and a Treasury Management Strategy Statement (TMSS) on likely financing and investment activity. The Code also requires that Councillors are informed of treasury management activities at least twice a year (mid-year and at the year-end).
8. The Council's TMSS for 2017/18 was approved by Full Council on 2 February 2017, and superseded by the TMSS 2018/19 on 1 February 2018.

9. The Council invests substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk are therefore central to the Council's treasury management strategy.
10. Although Harlow Council's TMSS and Lending List permits investments with Banks and Building Societies, its approach has been to avoid bail-in risk by lending to local authorities instead.
11. This report fulfils the Council's legal obligation to have regard to the CIPFA Code.

External Context (supplied by Arlingclose)

12. **Economic commentary:** 2017-18 was characterised by the push-pull from expectations of tapering of Quantitative Easing (QE) and the potential for increased policy rates in the US and Europe and from geopolitical tensions, which also had an impact.
13. The UK economy showed signs of slowing with latest estimates showing GDP, helped by an improving global economy, grew by 1.8% in calendar year 2017, the same level as in 2016. This was a far better outcome than the majority of forecasts following the EU Referendum in June 2016, but it also reflected the international growth momentum generated by the increasingly buoyant US economy and the re-emergence of the Eurozone economies.
14. The inflationary impact of rising import prices, a consequence of the fall in sterling associated with the EU referendum result, resulted in year-on-year CPI rising to 3.1% in November before falling back to 2.7% in February 2018. Consumers felt the squeeze as real average earnings growth, i.e. after inflation, turned negative before slowly recovering. The labour market showed resilience as the unemployment rate fell back to 4.3% in January 2018. The inherent weakness in UK business investment was not helped by political uncertainty following the surprise General Election in June 2017 and by the lack of clarity on Brexit, the UK and the EU only reaching an agreement in March 2018 on a transition which will now be span April 2019 to December 2020. The Withdrawal Treaty is yet to be ratified by the UK parliament and those of the other 27 EU member states and new international trading arrangements are yet to be negotiated and agreed.
15. The Bank of England's Monetary Policy Committee (MPC) increased Bank Rate by 0.25% (to 0.5%) in November 2017. It was significant in that it was the first rate hike in ten years, although in essence the MPC reversed its August 2016 cut following the referendum result. The February 'Inflation Report' indicated the MPC was keen to return inflation to the 2% target over a more conventional (18-24 month) horizon with 'gradual' and 'limited' policy tightening. Although in March two MPC members voted to increase policy rates immediately and the MPC itself stopped short of committing itself to the timing of the next increase in rates, the minutes of the meeting suggested that an increase in May 2018 was highly likely. The Bank of England increased the Bank Rate to 0.75% on 2 August 2018.

16. In contrast, economic activity in the Eurozone gained momentum and although the European Central Bank removed reference to an 'easing bias' in its market communications and had yet to confirm its QE intention when asset purchases end in September 2018, the central bank appeared some way off normalising interest rates. The US economy grew steadily and, with its policy objectives of price stability and maximising employment remaining on track, the Federal Reserve Open Market Committee (FOMC) increased interest rates in December 2017 by 0.25% and again in March, raising the policy rate target range to 1.50% - 1.75%. The Fed is expected to deliver two more increases in 2018 and a further two in 2019. However, the imposition of tariffs on a broadening range of goods initiated by the US, which has led to retaliation by China, could escalate into a deep-rooted trade war having broader economic consequences including inflation rising rapidly, warranting more interest rate hikes.
17. **Financial markets:** The increase in Bank Rate resulted in higher money markets rates: 1-month, 3-month and 12-month LIBID rates averaged 0.32%, 0.39% and 0.69% and at 31 March 2018 were 0.43%, 0.72% and 1.12% respectively.
18. Gilt yields displayed significant volatility over the twelve-month period with the change in sentiment in the Bank of England's outlook for interest rates. The yield on the 5-year gilts which had fallen to 0.35% in mid-June rose to 1.65% by the end of March. 10-year gilt yields also rose from their lows of 0.93% in June to 1.65% by mid-February before falling back to 1.35% at year-end. 20-year gilt yields followed an even more erratic path with lows of 1.62% in June, and highs of 2.03% in February, only to plummet back down to 1.70% by the end of the financial year.
19. The FTSE 100 had a strong finish to the calendar year 2017, reaching yet another record high of 7688, before plummeting below 7000 at the beginning of 2018 in the global equity correction and sell-off.
20. **Credit background:** In the first quarter of the financial year, UK bank credit default swaps (CDS) reached three-year lows on the announcement that the Funding for Lending Scheme, which gave banks access to cheaper funding, was being extended to 2018. For the rest of the year, CDS prices remained broadly flat.
21. The rules for UK banks' ring-fencing were finalised by the Prudential Regulation Authority and banks began the complex implementation process ahead of the statutory deadline of 1 January 2019. As there was some uncertainty surrounding which banking entities the Council would be dealing with once ring-fencing was implemented and what the balance sheets of the ring-fenced and non ring-fenced entities would look like, in May 2017 Arlingclose advised adjusting downwards the maturity limit for unsecured investments to a maximum of 6 months. The rating agencies had slightly varying views on the creditworthiness of the restructured entities.
22. Barclays was the first to complete its ring-fence restructure over the 2018 Easter weekend; wholesale deposits including local authority deposits will henceforth be accepted by Barclays Bank plc (branded Barclays International), which is the non ring-fenced bank. The Council's own bank accounts were migrated to the non ring-fenced bank.

23. **Money Market Fund regulation:** The new EU regulations for Money Market Funds (MMFs) were finally approved and published in July and existing funds will have to be compliant by no later than 21 January 2019. The key features include Low Volatility Net Asset Value (LVNAV) Money Market Funds which will be permitted to maintain a constant dealing NAV, providing they meet strict new criteria and minimum liquidity requirements. MMFs will not be prohibited from having an external fund rating (as had been suggested in draft regulations). Arlingclose expects most of the short-term MMFs it recommends to convert to the LVNAV structure and awaits confirmation from each fund.
24. **Credit Rating developments:** The most significant change was the downgrade by Moody's to the UK sovereign rating in September from Aa1 to Aa2 which resulted in subsequent downgrades to sub-sovereign entities including local authorities.
25. Changes to credit ratings included Moody's downgrade of Standard Chartered Bank's long-term rating to A1 from Aa3 and the placing of UK banks' long-term ratings on review to reflect the impending ring-fencing of retail activity from investment banking (Barclays, HSBC and RBS were on review for downgrade; Lloyds Bank, Bank of Scotland and National Westminster Bank were placed on review for upgrade).
26. Standard & Poor's (S&P) revised upwards the outlook of various UK banks and building societies to positive or stable and simultaneously affirmed their long and short-term ratings, reflecting the institutions' resilience, progress in meeting regulatory capital requirements and being better positioned to deal with uncertainties and potential turbulence in the run-up to the UK's exit from the EU in March 2019. The agency upgraded Barclays Bank's long-term rating to A from A- after the bank announced its plans for its entities post ring-fencing.
27. Fitch revised the outlook on Nationwide Building Society to negative and later downgraded the institution's long-term ratings due to its reducing buffer of junior debt. S&P revised the society's outlook from positive to stable.
28. **Other developments:** In February, Arlingclose advised against lending to Northamptonshire County Council. It issued a section 114 notice in the light of severe financial challenge and the risk that it would not be in a position to deliver a balanced budget.
29. In March, following Arlingclose's advice, the Council removed RBS plc and National Westminster Bank from its counterparty list. This did not reflect any change to the creditworthiness of either bank, but a tightening in Arlingclose's recommended minimum credit rating criteria to A- from BBB+ for Financial Year 2018-19. The current long-term ratings of RBS and NatWest do not meet this minimum criterion, although if following ring-fencing NatWest is upgraded, the bank would be reinstated on the Council's lending list.
30. As mentioned in the introduction, the Council's approach has been to lend sums increasingly to local authorities to avoid individual bank bail in risk. It continues to invest in Money Market Funds, holds a Cash Plus Fund, and invests in a Property Fund which has the risk of capital value fluctuations but an attractive quarterly dividend.

Local Authority Regulatory Changes

31. **Revised CIPFA Codes:** CIPFA published revised editions of the Treasury Management and Prudential Codes in December 2017. The required changes from the 2011 Code are being incorporated into Treasury Management Strategies and monitoring reports.
32. The 2017 Prudential Code introduces the requirement for a Capital Strategy which provides a high-level overview of the long-term context of capital expenditure and investment decisions and their associated risks and rewards along with an overview of how risk is managed for future financial sustainability. Where this strategy is produced and approved by full Council, the determination of the Treasury Management Strategy can be delegated to a committee. The Code also expands on the process and governance issues of capital expenditure and investment decisions.
33. Officers are working towards producing a Capital Strategy for 2019/20, noting guidance received from our Treasury Management advisors.
34. In the 2017 Treasury Management Code the definition of ‘investments’ has been widened to include financial assets as well as non-financial assets held primarily for financial returns such as investment property. These, along with other investments made for non-treasury management purposes such as loans supporting service outcomes and investments in subsidiaries, must be discussed in the Capital Strategy or Investment Strategy. Additional risks of such investments are to be set out clearly and the impact on financial sustainability is to be identified and reported.
35. **MHCLG Investment Guidance and Minimum Revenue Provision (MRP):** In February 2018 the Ministry of Housing, Communities and Local Government (MHCLG) published revised Guidance on Local Government and Investments and Statutory Guidance on Minimum Revenue Provision (MRP).
36. Changes to the Investment Guidance include a wider definition of investments to include non-financial assets held primarily for generating income return and a new category called “loans” (e.g. temporary transfer of cash to a third party, joint venture, subsidiary or associate). The Guidance introduces the concept of proportionality, proposes additional disclosure for borrowing solely to invest and also specifies additional indicators. Investment strategies must detail the extent to which service delivery objectives are reliant on investment income and a contingency plan should yields on investments fall.
37. The definition of prudent MRP has been changed to “put aside revenue over time to cover the CFR”; it cannot be a negative charge and can only be zero if the CFR is nil or negative. Guidance on asset lives has been updated, applying to any calculation using asset lives. Any change in MRP policy cannot create an overpayment; the new policy must be applied to the outstanding CFR going forward only.
38. **MiFID II:** As a result of the second Markets in Financial Instruments Directive (MiFID II), from 3 January 2018 local authorities were automatically treated as retail clients but could “opt up” to professional client status, providing certain criteria was met which includes having an investment balance of at least £10 million and the person(s) authorised to make investment decisions on behalf of the authority have at least a year’s relevant professional experience. In addition, the regulated financial services firms to

whom this directive applies have had to assess that that person(s) have the expertise, experience and knowledge to make investment decisions and understand the risks involved.

39. The Council has met the conditions to opt up to professional status and has done so in order to maintain its erstwhile MiFID II status prior to January 2018. The Council will continue to have access to products including money market funds, pooled funds, treasury bills, bonds, shares and to financial advice.

Local Context

40. On 31 March 2018, the Council's underlying need to borrow for capital purposes as measured by the Capital Financing Requirement (CFR) was £234.010m, while usable reserves and working capital as the underlying resources available for investment were £51.581m.

Borrowing Activity

41. At 31 March 2018, the Council held £211.837m of long term loans, unchanged on the previous year.

Investment Activity

42. The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. During 2017/18, the Council's investment balance ranged between £37.438m and £49.715m due to timing differences between income and expenditure. The year-end investment position and the year-on-year change in show in table 1 below.

Table 1: Investment Position (Treasury Investments)

	31.3.17 Balance £m	2017/18 Movement £m	31.3.18 Balance £m	31.3.18 Rate %
Banks & building societies (unsecured)	12.072	(-) 12.052	0.020	0.35
Building Societies without credit ratings	1.000	(-) 1.000	0	0
Local Authorities	11.000	8.300	19.300	0.60
Money Market Funds	9.815	4.355	14.170	0.39
Other Pooled Funds:				
- Cash Plus Fund	0	2.000	2.000	0.31
- Property Fund (CCLA)	2.000	0	2.000	4.41
Total investments	35.887	1.603	37.490	

43. Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

44. In furtherance of these objectives, and given the increasing risk and low returns from short-term unsecured bank investments, Officers have preferred to invest with local authorities rather than individual banks or building societies which carry bail-in risk. Although investments in Money Market Funds carry risk of bail-in, because the Fund itself is large and investment diversified the exposure itself is reduced. The progression of credit risk and return metrics for the Council's investments managed in-house are shown in the extracts from Arlingclose's quarterly investment benchmarking in table 2 below.

Table 2: Investment Benchmarking

	Credit Score (where 1 is low risk)	Credit Rating	Bail-in Exposure	WAM* (days)	Rate of Return**
31.03.2017	4.04	AA-	56%	43	0.51%
30.06.2017	3.97	AA-	64%	51	0.62%
30.09.2017	3.87	AA-	33%	58	0.67%
31.12.2017	4.15	AA-	36%	49	0.76%
31.03.2018	4.10	AA-	42%	53	0.97%
Similar LAs	4.22	AA-	53%	109	1.32%
All LAs	4.24	AA-	55%	35	1.08%

*Weighted average maturity **Rate of Return adjusted for capital gains / losses

Other Non-Treasury Holdings and Activity

45. Although not classed as treasury management activities, the 2017 CIPFA Code now requires the Council to report on investments for policy reasons outside of normal treasury management. This includes service investments for operational and/or regeneration as well as commercial investments which are made mainly for financial reasons. The Council also holds £2.5m of investments in loans to local businesses and £0.936m to its subsidiaries. This represents a decrease of £0.234m on the previous year.
46. These non-treasury investments generated £51,429 of investment income for the Council after taking account of direct costs, representing a rate of return of 4.88%. This is higher than the return earned on treasury investments but reflects the additional risks to the Council of holding such investments.

Compliance Report

47. The Head of Finance is pleased to report that all treasury management activities undertaken during 2017/18 complied fully with the CIPFA Code of Practice and the Council's approved Treasury Management Strategy.

Annex A Prudential Indicators 2017/18

Introduction: The Local Government Act 2003 requires the Council to have regard to the Chartered Institute of Public Finance and Accountancy's *Prudential Code for Capital Finance in Local Authorities* (the Prudential Code) when determining how much money it can afford to borrow. The objectives of the Prudential Code are to ensure, within a clear framework, that the capital investment plans of local authorities are affordable, prudent and sustainable, and that treasury management decisions are taken in accordance with good professional practice. To demonstrate that the Council has fulfilled these objectives, the Prudential Code sets out the following indicators that must be set and monitored each year.

This report compares the approved indicators with the outturn position for 2017/18. Actual figures have been taken from or prepared on a basis consistent with, the Council's statement of accounts.

Capital Expenditure: The Council's capital expenditure and financing may be summarised as follows.

Capital Expenditure and Financing	2017/18 Estimate £m	2017/18 Actual £m	Difference £m
General Fund	5.091	8.096	3.005
HRA	20.910	13.346	(-)7.564
Total Expenditure	26.001	21.442	(-)4.559
Capital Receipts	2.431	1.260	(-)1.171
Government Grants	1.129	2.395	1.266
Major Repairs Reserve	10.777	11.801	1.024
Revenue	9.097	2.119	(-)6.978
Borrowing	2.567	3.867	1.300
Total Financing	26.001	21.442	(-)4.559

Capital Financing Requirement: The Capital Financing Requirement (CFR) measures the Council's underlying need to borrow for a capital purpose.

Capital Financing Requirement	31.03.18 Estimate £m	31.03.18 Actual £m	Difference £m
General Fund	43.143	46.640	3.497
HRA	187.370	187.370	0
Total CFR	230.513	234.010	3.497

The CFR increased by £3.497m as capital expenditure financed by debt was less than resources put aside for debt repayment.

Actual Debt: The Council's actual debt at 31 March 2018 was as follows:

Debt	31.03.18 Estimate £m	31.03.18 Actual £m	Difference £m
Borrowing	211.837	211.837	0
Finance leases	0	0	0
Total Debt	211.837	211.837	0

Gross Debt and the Capital Financing Requirement: In order to ensure that over the medium term debt will only be for a capital purpose, the Council should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. This is a key indicator of prudence.

Debt and CFR	31.03.18 Estimate £m	31.03.18 Actual £m	Difference £m
Total debt	211.837	211.837	0
Capital financing requirement	230.513	234.010	3.497
Headroom	18.676	22.173	3.497

Total debt remained below the CFR during the forecast period.

Operational Boundary for External Debt: The operational boundary is based on the Council's estimate of most likely (i.e. prudent but not worst case) scenario for external debt. It links directly to the Council's estimates of capital expenditure, the capital financing requirement and cash flow requirements, and is a key management tool for in-year monitoring. Other long-term liabilities are not borrowing but form part of the Council's debt.

Operational Boundary and Total Debt	31.03.18 Boundary £m	31.03.18 Actual Debt £m	Complied
Borrowing	252.000	211.837	✓
Other long-term liabilities	1.500	0	✓
Total Debt	253.500	211.837	✓

Authorised Limit for External Debt: The authorised limit is the affordable borrowing limit determined in compliance with the Local Government Act 2003. It is the maximum amount of

debt that the Council can legally owe. The authorised limit provides headroom over and above the operational boundary for unusual cash movements.

Authorised Limit and Total Debt	31.03.18 Boundary £m	31.03.18 Actual Debt £m	Complied
Borrowing	260.000	211.837	✓
Other long-term liabilities	5.000	0	✓
Total Debt	265.000	211.837	✓

Ratio of Financing Costs to Net Revenue Stream: This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs, net of investment income.

Ratio of Financing Costs to Net Revenue Stream	31.03.18 Estimate %	31.03.18 Actual %	Difference %
General Fund	1.03	1.19	0.16
HRA	11.97	10.68	(-) 1.29

Adoption of the CIPFA Treasury Management Code: Full Council approved the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice* at its meeting on 10 February 2010.

HRA Limit on Indebtedness: The Council's HRA CFR should not exceed the limit imposed by the Department for Communities and Local Government.

HRA CFR	31.03.18 Limit £m	31.03.18 Actual £m	Complied
HRA Capital Financing Requirement	208.837	208.837	✓

Annex B

Glossary of Terms and Definitions

Bank Rate:

The term 'Bank Rate' is 'the official Bank Rate paid on commercial bank reserves', i.e. reserves placed by commercial banks with the Bank of England as part of the Bank's operations to reduce volatility in short term interest rates in the money markets.

Base Rate:

The term Base Rate refers to the rate which is set by each high street bank; it is the key foundational rate on which they each base all their various lending rates to customers. It is normally set at the same rate as the Bank Rate (q.v.) and changes in line with, and very soon after changes in Bank Rate.

CD: see 'Certificate of deposit'.

CDS: see 'Credit Default Swaps'

CFR: see 'Capital Financing Requirement'

CRA: see 'Credit Rating Agency'.

Call Account: 'Call account' is a bank deposit where funds can be withdrawn at any time.

Capital Financing Requirement

The Capital Financing Requirement reflects the Council's underlying need to borrow for capital purposes. Thus, if new capital expenditure is incurred and not financed from sources other than by borrowing, the CFR will increase by the amount of that expenditure. Borrowing, up to the value of the CFR, may be either from internal cash balances or externally, such as from the Public Works Loan Board (q.v.).

Certificate of Deposit

A certificate of deposit is an unsecured investment issued by a bank or building society which is a fixed deposit, giving a guaranteed interest return. These differ from term deposits in that the lender is not obliged to hold the investment through to maturity and may realise the cash by selling the CD into an active secondary market. This may be useful in instances where the counterparty receives a downgraded credit rating, or the investor encounters an unexpected cashflow issue. CDs are obtained through specialist brokers who deal through the primary and secondary market. CDs offer liquidity and greater access to counterparties who do not trade in term deposits.

CIPFA: Chartered Institute of Public Finance and Accountancy.

CIPFA Treasury Management Code of Practice

This represents official practitioners' guidance, which is produced by CIPFA. The government expects Councils and other public service authorities to adopt and comply with the code. The recommendations made in the Code provide a basis for all these public service organisations to create clear treasury management objectives and to structure and maintain sound treasury management policies and practices.

Corporate Bond

Strictly speaking, corporate bonds are those issued by companies. However, the term is used to cover all bonds other than those issued by governments in their own currencies and includes issues by companies, supranational organisations and government agencies

Counterparty

A counterparty is a party with which a transaction is done.

CPI: Consumer Prices Index

Credit Default Swaps

A CDS is a contract between two counterparties in which the buyer of the contract makes quarterly payments to the seller of the contract in exchange for a payoff if there is a credit event (e.g. default) of the reference entity (i.e. the third party on whom the contract is based). The contract essentially provides a means of insurance to the buyer of the CDS against default by a borrower. The “spread” (effectively the premium paid by the CDS buyer) provides an indication of the perceived risk of a default occurring.

Credit Rating

A credit rating is an estimate of the quality of a debt from the lender viewpoint in terms of the likelihood of interest and capital not being paid and of the extent to which the lender is protected in the event of default.

An individual, a firm or a government with a good credit rating can borrow money from financial institutions more easily and cheaply than those who have a bad credit rating.

Credit Ratings are evaluated by Credit Rating agencies (q.v.).

Credit rating agency

‘Credit rating agency’, or ‘rating agency’, or CRA, is a firm that issues opinions on companies’ ability to pay back their bonds. These opinions are often abbreviated on an alphanumeric scale ranging from AAA to C (or equivalent). The three CRAs used by the Council are Fitch, Moody’s and Standard and Poor’s.

DMADF: see ‘Debt Management Agency Deposit Facility’

DMO: see ‘Debt Management Office’

Dealing

Is the process of carrying out transactions with a counterparty (q.v.), including agreeing the terms of an investment. This is usually conducted through a broker.

Debt Management Agency Deposit Facility

Deposit Account offered by the Debt Management Office (q.v.), guaranteed by the UK government.

Debt Management Office

The Debt Management Office (DMO) is an executive agency of HM Treasury responsible for carrying out the government’s debt management policy and managing the aggregate cash needs of the Exchequer. It is also responsible for lending to local authorities and managing certain public sector funds.

ECB: European Central Bank

Equity

A share in a company with limited liability. It generally enables the holder to share in the profitability of the company through dividend payments and capital gain.

EU: European Union

Fed: The Federal Reserve (US)

Forward Deal

The act of agreeing today to deposit funds with an institution for an agreed time limit, on an agreed future date, at an agreed rate.

Forward Deposits: see 'forward deal'

Fund Manager

The individual responsible for making decisions related to any portfolio of investments in accordance with the stated goals of the fund.

GDP: Gross Domestic Product

Gilt

Registered British government securities giving the investor an absolute commitment from the government to honour the debt that those securities represent.

Gilt Funds

Pooled fund investing in bonds guaranteed by the UK government.

HRA: Housing Revenue Account

HRACFR: Housing Revenue Account Capital Financing Requirement

Liquidity

Liquidity refers to an asset that can be turned into cash or the ability to quickly sell or buy an asset

LIBID: see 'London Interbank Bid Rate'

LIBOR: see 'London Interbank Offer Rate'

London Interbank Bid Rate

The 'London Interbank Bid Rate' (LIBID) is the rate of interest at which first-class banks in London will bid for deposit funds. Often used as a benchmark for deposit rates. LIBID is not fixed in the same way as LIBOR (q.v.), but is typically one-sixteenth to one-eighth of a per cent below LIBOR.

London Interbank Offer Rate

'London Interbank Offer Rate' (LIBOR) is the interest rate which banks pay when lending to each other. It is calculated at a specified time each day and based on what it would cost a

panel of banks to borrow funds for various periods of time and in various currencies. It then creates an average of the individual banks' figures.

MHCLG: Ministry of Housing, Communities and Local Government.

MMF: see 'Money Market Fund'

Money Market Fund

Money Market Funds are mutual funds that invest in short-term debt instruments. They provide the benefits of pooled investment, as investors can participate in a more diverse and high-quality portfolio than they otherwise could individually. Like other mutual funds, each investor who invests in a money market fund is considered a shareholder of the investment pool, a part owner of the fund. Money market funds are actively managed within rigid and transparent guidelines to offer safety of principal, liquidity and competitive sector-related returns. It is very similar to a unit trust, however, in a MMF equities are replaced by cash instruments. Returns are typically around 1 month LIBID (q.v.), and the average maturity is generally below 60 days.

MPC: Monetary Policy Committee

MRP: Minimum Revenue Provision, for the repayment of debt.

Other Bond Funds

Pooled funds investing in a wide range of bonds.

PWLB: see 'Public Works Loan Board'

Public Works Loan Board

The Public Works Loan Board (PWLB) is a UK Government statutory body whose function is to lend money from the National Loans Fund to Councils and other public bodies and to collect the repayments.

Rating Agency: see 'Credit Rating Agency'

T-bills: see 'Treasury Bills'.

Term Deposit

(or 'Time deposit') is a generic term for a bank deposit where funds cannot be withdrawn for a fixed period of time. The lender receives a fixed rate of interest. These are unsecured investments and place the lender at risk of bail-in should this occur during the term of the investment.

Time Deposit: see 'Term Deposit'

Treasury Bills

Treasury bills are a AAA/AA+ rated, short-dated form of Government debt, issued by the Debt Management Office (q.v.), via a weekly tender, on a Friday. Lenders would use the services of a specialist broker to access the market. These usually have a maturity of one, three or six

months and provide a return to the investor by virtue of being issued at a discount to their final redemption value. There is also an active secondary market for T-bills which means that lending may be available for a range of dates. Interest rates tend to be higher than the DMADF (q.v.).

Treasury Management Strategy

This is the Council's overall policy and framework by which it will carry out that policy in relation to its borrowing and investment needs in the coming financial year.

Treasury Management Policy Statement

This is the Council's statement of intention in respect of its treasury management. It is prescribed by the CIPFA Treasury Management Code of Practice (q.v.).

Variable Rate Asset Value

'Variable Rate Asset Value' (VNAV) occurs where the net asset value, or principal sum, invested may change depending on trading conditions. The value is calculated at the end of the business day based on the value of investments less any liabilities divided by the number of shares outstanding. With investments carrying this attribute, the capital sum invested may not be equal to the capital sum repaid.

VNAV: see 'Variable Net Asset Value'.

Weighted Average Maturity

'Weighted average maturity', or WAM, is used to measure interest rate risk. WAM is calculated by taking the maturity of the underlying money market instruments held by the fund, weighted according to the relative holdings per instrument.

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: AWARD OF CONTRACT FOR DOMESTIC WASTE AND RECYCLING COLLECTION SERVICES

PORTFOLIO HOLDERS: COUNCILLOR MARK INGALL, LEADER OF THE COUNCIL
COUNCILLOR DANNY PURTON, PORTFOLIO HOLDER FOR ENVIRONMENT

LEAD OFFICERS: SENIOR MANAGEMENT BOARD, (01279) 446004

This is a Key Decision

It is on the Forward Plan as Decision Number I009243

Call-in Procedures may apply

This decision will affect no ward specifically.

RECOMMENDED that:

- A** The most economically advantageous tender for the contract for the Provision of Domestic Waste and Recycling Collection and Allied Services submitted by Bidder A is accepted, subject to formal contract.
- B** Delegated authority is given to the Managing Director, in consultation with the Leader of the Council, to make the necessary contractual arrangements.

REASON FOR DECISION

- A** Domestic waste collection is a statutory function currently carried out by an external service provider under contract to the Council. The contract expires at the end of March 2019. Awarding the contract now will allow time for mobilisation including implementation of ICT systems and procurement of a vehicle fleet so that the Council is able to continue to provide the service beyond that date.

BACKGROUND

1. An open procurement process was undertaken for a ten year contract to provide services which conformed to the Council's specification. Bids were assessed on a 70 percent cost and 30 percent quality basis. The process required bidders to submit 10 comprehensive method statements as set out in Appendix A to detail proposals for service delivery.

2. Three expressions of interest, all from competent contractors were received. One withdrew from the process without submitting a bid and two bids which in all respects met, and in many respects exceeded, the Council's requirements, were received by the deadline for the return of tenders.

ISSUES/PROPOSALS

3. Both bids proposed services that retain the essential core elements of the current service provision: alternate weekly collection of residual and mixed dry recycling streams, using similar containers and methodology, with provision for charged-for bookable bulky household item collection and free-of-charge hygiene waste collection in qualifying cases. Notably the collection of food waste from communal bins (from flat blocks) did not form part of the services required.
4. Over the last five years grant funding has allowed for a separate food waste collection from properties with communal bins. This funding stream has now expired. The short waste collection cycle used to service communal properties will limit retention of putrescible waste and will simplify the service offer for residents.
5. The bidders' proposals to work with organisations from the third sector in service delivery were assessed as part of the quality assessment. Both bidders made proposals which would see suitable materials from the bulky household waste stream diverted to a third sector organisation and would simplify access to services for Harlow residents.
6. Both bids offered modern ICT solutions that would allow collection of comprehensive service performance data, with communication in near real-time between front line service provision in the field and customer interface, and interaction between Council systems and the contractor's management system. This would mean for example:
 - a) That Officers would be able to see progress on collection rounds;
 - b) Vehicle crews could report a problem with a planned collection electronically as it happened, and upload photographs if required; and
 - c) Supervisors could update crews with new instructions as issues arose.
7. Such solutions should allow the Council to deal far more quickly and easily with customer enquiries, and further development by the Council of a range of electronic self-service options such as booking bulky waste collections, reporting missed bins, and getting localised information about service issues, such as delays caused by icy weather.
8. Better access to management data allows contractors to regularly review operations to ensure that optimum use is made of vehicles and human resources, which helps to minimise carbon impact and overall cost.

9. Bidders were required to propose arrangements for a new opt-in subscription garden waste service to operate from 1 April 2020, to be based on fortnightly collections from wheelie bins, or sacks where wheelie bins could not be used. This would eliminate the currently available ad-hoc sack based collection which is inefficient and costly to operate. It is hoped that increased efficiency will enable the Council to reduce the charge for a wheelie-bin based service so that it is more accessible and will attract significantly more customers.
10. The markets for the materials separated by materials recycling facilities from municipal mixed dry recyclate have been volatile in recent years. Sale values or disposal costs are strongly affected by fluctuations in the cost of virgin raw materials as well as the international regulatory environment. The procurement process required the handling costs for mixed dry recyclate to be priced per tonne and the price to be reviewed annually with inflation as for core contract costs. However, indexes of the sale prices or disposal costs of recycled commodities are used to determine the appropriate cost or value of the mixed recyclate stream. Indices and the composition of the mixed dry recyclate are to be reviewed at six monthly intervals, and so this element of the contract price will be subject to fluctuation.
11. The effect of any increase or decrease in the value or disposal cost for mixed dry recyclate is to be shared equally with the contractor. This ensures that neither party is exposed to the entire risk of any market fluctuations.
12. The outcome of evaluation of the bids received is shown below. Further information on bids is contained in confidential Appendix B.

Table 1 – Cost and Quality Scores for Tenders

Bidder	Score		
	Cost	Quality	Total
A	70	25.20	95.20
B	69.49	22.00	91.49

13. The bid submitted by bidder A clearly and consistently demonstrated a pragmatic, thoroughgoing approach to all aspects of the Council's requirements, in accord with the proposals agreed by Cabinet on 23 March 2017 including service resilience in the case of foreseeable circumstances, which was specifically adapted to local circumstances, showing across all method statements how the resources that the organisation could bring to bear would be used in practice in Harlow.
14. It is proposed that the tender submitted by Bidder A is accepted as the most economically advantageous tender for the contract for the provision of Domestic Waste and Recycling Collection and Allied Services.

IMPLICATIONS

Place (Includes Sustainability)

As contained within the report.

Author: Jane Greer, Head of Community Wellbeing, on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

The tender price is effective from April 2019 and any budgetary implications will be dealt with as part of the 2019/20 budget process. Currently it is anticipated that the contract costs will be accommodated within the existing budgetary provision for domestic refuse and recycling.

Author: Simon Freeman, Head of Finance

Housing

None specific.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

None specific.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

The process for awarding this important contract is lawful, according with EU legislative requirements and the Council's contract standing order processes. The assessment method has identified the most economically advantageous tender and awarding accordingly protects the Council from potential challenge.

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

Appendix A – Method Statements

Appendix B (Confidential) – Additional Information Regarding Bids

Background Papers

Procurement of Domestic Waste and Recycling Services: Report to Cabinet 23
March 2017.

Glossary of terms/abbreviations used

ICT – Information and Communication Technology

Appendix A – Method Statements

QUESTIONS BIDDERS ARE REQUIRED TO ANSWER

The responses to the questions in this Appendix along with the prices submitted in the pricing schedule will be used to evaluate the responses received under the criteria and weighting system. Please refer to the Award Criteria detailed in Table 1 and Table 2: Detailed Criteria and Weightings. Familiarise yourself with this and the Authority's Specification before completing this Appendix 2.

Each Method Statement (MS) answer must address all the details required in the question and the Specification, in comprehensive prose, punctuated, and in clear understandable plain English. A list of bullet point text will not suffice as an answer.

Each Method Statement should be written clearly and unambiguously explaining how, if appointed the Bidder will fulfil the Authority's requirements. Wording such as "the Contractor shall or will" should be used; indefinite terminology such as "proposes", "intending" and "may" should be avoided as far as is possible.

Each Method Statement should be comprehensive when read alone. All of the information required shall be included as part of the response and not included elsewhere or in any other Method Statement unless specifically requested.

Each Method Statement should be uploaded to the Procurement Portal as a separate document, clearly labelled with the Method Statement number, subject and name of Bidder.

Method Statement No. 1: ICT SYSTEMS

Maximum Score 10 – Weighting 3%

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

Systems

- An explanation of the ICT systems proposed;
- Including precise details of systems proposed and how effectively they meet or exceed the Authority's stated requirements in the Specification;
- A detailed ICT map showing how inputs are converted to outputs;
- An explanation of how the Authority will be given effective access to these outputs and other data;
- The impact the systems will have on operations both in regard to potential disruption to existing Council operations if any, and in regard to beneficial effects on the operation of the contract;
- The advantages the systems will provide the Authority;
- The response may be supported by details of reference sites where the proposed systems are in place, how they perform and the benefits that have been provided to the Authority to illustrate the deliverability of the proposal;

Integration and mobilisation

- Details of the efficient integration and mobilisation timetable for ICT; and

Customer Relationship Management

- Bidders are required to set out how they will utilise the Authority's chosen Customer Relationship Management system (Forms Firm step).
- Bidders should set out what reporting requirements will be fulfilled by use of this system, an explanation on how those reporting requirements not fulfilled by the system will be met, and how the reports can be used to demonstrate adherence to the performance standards and requirements set out in the Authority's Specification.

NO WORD COUNT

Method Statement No. 2: INFRASTRUCTURE

Maximum Score 10 – Weighting 3%

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

- An explanation of how the Authority's depot is to be used effectively, both short-term and longer-term (to include any planning and licensing matters).
- Infrastructure plans, including plans for efficient management of materials, facilities to be used for processing, and any how planning and licencing matters will be addressed effectively.
- An overview of the Bidder's depot proposal, including storage of vehicles, equipment and containers and how the Bidder will efficiently manage the depot;
- A detailed plan of the facility showing how operations will fit onto the site;
- Clear estimates as to any costs of building / adapting the facility;
- Site Supervision and security maintained to a high standard;
- Proposals for maintaining excellent H&S standards at the depot;
- Details of suitable sanitary and welfare facilities provided for all staff, including on service vehicles;
- Vehicle maintenance arrangements;
- Details of Depot and Vehicle insurance arrangements;
- Proposals for handling and treating (including Recycling) materials, including details of the facilities used;
- Where a specific facility is to be used (e.g. Materials Recovery Facility) – details of appropriate operational days and hours;
- Effective methods of handling to ensure material qualities are maximised; and
- Proposed end markets for Recyclables.

NO WORD COUNT

Method Statement No. 3: MANAGEMENT OF ASSETS**Maximum Score 10 – Weighting 1%**

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

Bidders should provide plans for the effective procurement and management of assets, materials, equipment and sub-contractors. Details should be provided in respect of your methodology for co-ordinating your supply chain in order to deliver projects more efficiently in the following areas:

- Policies and proposals in relation to vehicles, containers and other key assets plus major sub-contractors
- Plans for the procurement and management of assets and sub-contractors (including insurances) should be provided;
- The response should include details of how you will ensure healthy supply chain management in respect of vehicles, containers and other key assets plus major sub-contractors; and purchasing policies for general supplies to ensure service performance. This may include tracking systems to ensure performance.
- Supply details of prompt payment or membership of the UK Prompt Payment Code (or equivalent schemes in other countries)
- All proposals should demonstrate inclusion of environmental and sustainability considerations

NO WORD COUNT**Method Statement No. 4: OPERATIONS****Maximum Score 10 - Weighting 6%**

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

The response should cover as a minimum the points below to demonstrate deliverability of the contract:

- Appropriate levels of vehicle and staffing resources for all waste and recycling collections including bulky waste & clinical waste (including explanation of pass rates, seasonality and vehicle capacity/tip times) for both the current services and new services;
- Examples of stated productivity levels which must include details of travelling times to / from depots and delivery points to illustrate deliverability;
- Analysis of the arisings to be collected and resources for carrying those tonnages;
- Detailed operational methodology for effectively undertaking the current services;
- Detailed operational methodology for effectively undertaking the new services;
- Explanation of the efficient methodology and resource deployment for all services (Refuse, Recycling, Food Waste, Garden Waste and

Bulky Waste);

- Proposals for achieving safe methods of work in relation to collection, and assessing the risk of collection activities;
- Appropriate working hours and Bank Holiday arrangements;
- Proposals for effectively complying with the Council's Side Waste policy;
- Proposals for effectively dealing with narrow / restricted access collections (including households whose collection points are not on the public highway);
- Proposals for effectively dealing with Assisted Collections;
- Proposals for effectively dealing with Missed Collections;
- Proposals for effectively dealing with Spillages;
- Proposals for effectively collecting Waste and Recycling from communal properties;
- Proposals for effective container delivery / management, clinical waste and container management (including the provisions for nappies and associated hygiene products).
- Excellent contingency arrangements in the event of failure to perform collection service;
- Proposals for effectively managing Bulky Waste, including use of / engagement with the Third Sector.
- Effective planning to address the expected increase in households over the life of the Contract.

Note: If a score of less than 4 marks is achieved for this question your Bid shall be excluded, not considered further and rejected from the process.

NO WORD COUNT

Method Statement No. 5: CUSTOMER CARE

Maximum Score 10 - Weighting 5%

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

Customer service

- Proposals for implementing customer care policies and standards, particularly the conduct of the Bidder's staff;
- Methodology for dealing with customer complaints, including any proposals for improving customer satisfaction;

Data

- Provide proposals for effectively dealing with and controlling personal data securely. The proposals should include; details of access controls in place, use and storage of paper information, destruction and minimisation processes, securing of laptops and removable media; details of technical security, firewalls and encryption. Bidders are referred to Section 6 of the part completed Information Sharing Protocol supplied as part of this ITT. (The successful Bidder will be required to complete this documents and written confirmation is required that this is agreed) ;
- Plans for effectively training and developing staff in respect of personal data handling
- Details of who is processing personal data and where personal data will be stored and managed are also required; and copies of proposed data sharing arrangements / agreements are also required.

Recruitment

- Description of the Contractor's recruitment policy and methods of staffing the Services (including staff retention).
- Details of training, staffing and recruitment policies and policies aimed at retaining staff.

Note: If a score of less than 4 marks is achieved for this question your Bid shall be excluded, not considered further and rejected from the process.

NO WORD LIMIT

Method Statement No. 6: MONITORING, MANAGEMENT AND SUPERVISION

Maximum Score 10 – Weighting 3%

Bidders should provide a response to the following matters taking into account the Authority’s requirements set out in the Specification.

This shall include details as to how staff will be supervised, monitored and audited to meet the standards of the Specification; details of the proposed Contract Manager and other senior staff members including details of relevant experience. a diagrammatic management structure together with numbers of staff at all levels;

- Proposals for Monitoring, Management and Supervision of the services as delivered on a day-to-day basis;
- A diagrammatic management structure together with numbers of staff at all levels;
- Details of the Managerial, Supervisory and Administration resources deployed on the Contract
- Details of how spare resources will support the services;
- Proposals for how the ICT system and technology will support the monitoring, management and supervision of the Contract (without repetition of MS 1);
- Details of how the Contractor will meet the Council’s reporting requirements; and
- Service resilience and Business Continuity.

NO WORD COUNT

Method Statement No. 7: HEALTH AND SAFETY**Maximum Score 10 – Weighting 3%**

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

- Proposals for effectively managing overall health and Safety including a description of the Health and Safety Responsibilities of the team to be deployed at the Harlow site and how these will be implemented and monitored
- Corporate Support provided in support of this contract including:
 - A description of the corporate governance arrangements for Health Safety and Welfare
 - A description of relevant Health safety and Welfare policies and how these will be implemented and monitored
 - Details of senior and intermediate management staff who will support the staff to be wholly or mainly employed on the contract including a description of their Health Safety and Welfare responsibilities
 - Details of staff within the bidder's organisation with specific health and safety responsibilities, such as dedicated Safety or Safety Health and Environment Officers, including their qualifications and how they will support the team to be deployed at the Harlow site and senior and intermediate management.
- Proposals for the suitable provision of equipment and facilities, required to meet the Health and Safety standards of the contract; and
- Health & Safety manual and details of effective reporting procedures.

NO WORD COUNT

Method Statement No. 8: MOBILISATION**Maximum Score 10 – Weighting 3%**

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

A mobilisation plan, including details of resources for co-ordination of the mobilisation plus reference examples of successful mobilisations: this to include details from the date of Contract Award until end of May 2020. The plan should include statements on approach to TUPE and pensions.

- Overview diagram of how the Bidder will mobilise this Contract from the date of Contract Award until end of May 2020;
- Detailed proposals for managing the mobilisation of this Contract, including resources and specialist staff;
- Specific description of how the Bidder's ICT proposals shall be mobilised;
- Proposals for mitigating transition problems;
- Proposals for managing TUPE and pensions; and
- Referenced examples of recent successful comparable mobilisations.

NO WORD COUNT

Method Statement No. 9: INNOVATION AND ADDED VALUE

Maximum Score 10 – Weighting 2%

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

The response to include but not be limited to the following:

- any proposals which could increase the recycling/composting rate, including the collection of additional materials and reducing contamination levels;
- any proposals for achieving continuous improvement on the Contract; and
- increasing public awareness of the impact of improperly disposed of waste
- identify initiatives that would reduce contaminants in the recycle stream with key items being food waste, nappies and textiles working in co-operation with the Council
- Third Sector engagement

NO WORD COUNT

Method Statement No. 10: CORPORATE MANAGEMENT

Maximum Score 10 – Weighting 5%

Bidders should provide a response to the following matters taking into account the Authority's requirements set out in the Specification.

Proposals for overall management of the Contract and working with the Authority (in addition to the local supervision and management provisions of MS5 and MS6), and the Bidder's Quality Management processes and Business Continuity Plan.

Within this Method Statement, Bidders are required to show an appreciation and understanding of the Authority's wider strategic aims and how a successful Service contributes to these; as follows:

- An explanation of the Bidder's effective management processes (avoiding repetition of MS5 & MS6) including any relevant accreditations;
- The Bidder's Quality Management processes and Business Continuity Plan.
- The Bidder's understanding of the Authority's wider strategic aims and how a successful Service contributes to these;
- How the Bidder would rapidly return Services to normal following the loss of (a) working day(s) due to inclement weather; awards,
- Details of testimonials and membership of any recognised bodies relevant to the services;
- Proposals for ensuring high performance on this contract through effective management; and
- Proposals for helping the Authority deliver a high quality service for its residents.

NO WORD LIMIT

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: AWARD OF CONTRACT FOR ADVICE SERVICES

PORTFOLIO HOLDER: COUNCILLOR EUGENIE HARVEY, PORTFOLIO HOLDER FOR COMMUNITY AND WELLBEING

LEAD OFFICER: JANE GREER, HEAD OF COMMUNITY WELLBEING (01279) 446406

CONTRIBUTING OFFICERS: JULIE GALVIN, SOLICITOR (01279) 446045

CHRISTINE HOWARD, YOUTH AND CITIZENSHIP MANAGER (01279) 446192

TINA MCDERMOTT, CONTRACTS MANAGER (01279) 446175

This is a Key Decision
It is on the Forward Plan as Decision Number I008161
Call-in Procedures may apply
This decision will affect no ward specifically.

RECOMMENDED that:

- A** Contractor A is awarded the contract for delivery of Advice Services for a period of three years from 1 October 2018 at £90,000 per annum subject to paragraph 7 of the report.
- B** Delegated authority is given to the Head of Community Wellbeing, in consultation with the Portfolio Holder for Community and Wellbeing, to make the necessary contractual arrangements.

REASON FOR DECISION

- A** Proceeding on this basis will enable the Council to deliver its commitment to Harlow residents in terms of providing access to quality advice services.

BACKGROUND

1. The Council invited bids for the provision of Advice Services to be delivered to the residents of Harlow by a suitably experienced and qualified/certified/registered organisation.

2. Core Services will comprise one-to-one advice, casework and advocacy work for residents on money management and debt advice; housing and welfare benefits as a minimum requirement of the contract.
3. In addition to the Core Service, the Council invited organisations to identify a range of additional services that could be delivered to:
 - a) Alleviate the impact of welfare reform;
 - b) Deliver benefit take-up campaigns;
 - c) Provide relevant information leaflets and booklets;
 - d) Provide training and/or outreach work for voluntary and community sector groups on welfare rights and advice issues; and
 - e) Supply the Council with information and advice in relation to welfare rights and advice issues.

ISSUES/PROPOSALS

4. Two tenders were received by the deadline and these were evaluated on the basis of 100 percent quality against pre-determined criteria included in the invitation to tender document.
5. Contractor A submitted a bid that achieved a total quality score of 420 out of 500 and the unsuccessful bidder scored a total of 317.5 points.
6. The bid demonstrates that Contractor A is capable of delivering the Core Services as described in the project specification as well as a range of additional services as per paragraph 3 above.
7. Without prejudice to the Council's rights and subject to a full service review at 24 months calculated from the contract commencement date, the Council may, at its sole full discretion, grant an extension to the contract of not more than 12 months.
8. The Council will operate a 'balanced scorecard' approach to performance management and will work with Contractor A to develop performance measurements and targets across the range of services.
9. The Council will expect benchmarking to be implemented against performance and the provider will be required to submit this information quarterly, with meetings also to initially take place quarterly and six-monthly thereafter.
10. It is proposed that Contractor A is awarded the contract for a period of three years with effect from 1 October 2018 with a budget of £90,000 per annum.

IMPLICATIONS

Place (Includes Sustainability)

None specific.

Author: Jane Greer, Head of Community Wellbeing, on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

The implications are set out within the report with the cost of service being met from the Council's Discretionary Service Fund.

Author: Simon Freeman, Head of Finance

Housing

The continued access to advice supports tenants/residents in managing and maintaining their tenancies and provides an independent assessment to support the Council's income management process.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

As contained within the report.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

The recommendation reflects the outcome of a detailed a robust exercise to identify an Advice Services provider. By following such procedures and awarding accordingly the Council is protected from challenge.

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

None.

Background Papers

None.

Glossary of terms/abbreviations used

None.

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: MHCLG PILOT PROGRAMME FOR 75 PERCENT BUSINESS RATES RETENTION – 2019/20

PORTFOLIO HOLDER: COUNCILLOR MIKE DANVERS, PORTFOLIO HOLDER FOR RESOURCES

LEAD OFFICER: SIMON FREEMAN, HEAD OF FINANCE
(01279) 446228

This is a Key Decision

It is not on the Forward Plan. The following exemption applies:

It is being considered under the urgency procedure due to the late release of information from the Government.

The decision is not subject to Call-in procedures for the following reasons:

The need for further information to be released by the Government means that a final decision is required before call-in procedures can be applied.

This decision will affect no ward specifically.

RECOMMENDED that:

- A** Notes the content of the report and its potential implications for the forthcoming budget setting for 2019/20.
- B** Grants delegated authority to the Head of Finance, in consultation with the Leader of the Council and the Portfolio Holder for Resources, to give notice formally of the Council's intention to accept or to decline to opt into the 75 percent BRR Pilot Programme with the other constituent Essex local councils as deemed most favourable to the Council.

REASON FOR DECISION

- A** To enable an informed decision, subsequent to the outcomes of an independent financial review and formulation of agreed terms, to be made in determining whether the Council should participate with Essex billing and precepting authorities in the Ministry of Housing, Community and Local Government's (MCHLG) Pilot Programme for 75 percent Business Rates Retention (BRR) in 2019/20.

BACKGROUND

1. The current Medium Term Financial Strategy (MTFS) was approved by Full Council on 2 February 2018. The MTFS incorporated the agreed funding under

the Government's four year deal through to 2019/20. It also highlighted a number of areas which will impact upon the Council's future resources, one of which included the longer-term implications of the Government's intentions for local retention of Business Rates and associated conditions that may be applied and the transfer of additional responsibilities to councils.

2. The Business Rate Retention Scheme (BRR) commenced in 2013/14 and has increasingly been regarded as the core source of direct Government funding within its Settlement Funding Assessment (SFA). Within the Autumn Statement made on 23 November 2016, the Chancellor set out the Government's intention to remove Revenue Support Grant (RSG) altogether and to focus council funding solely on BRR. The BRR system was intended to see a simplification of council funding arrangements and to incentivise councils to encourage economic growth in their areas. In return, this would improve the business rates collectable and therefore the funding retained locally through the funding arrangements.
3. The current funding mechanism system retains the RSG system within the SFA which in itself is extremely complex and assesses a council's funding need on four key formula driven elements. It is very much a mechanism which can be used by the Government to influence council funding at a national level. It is important to recognise the forward forecast of funding received through the RSG element of SFA has been projected to reduce to almost nil during the period of the MTF5.
4. BRR, in its current format, has in reality been more complex than had been envisaged whilst it transfers significant risks to councils. It also introduced the redistribution of significant proportions (50 percent) of locally collected business rates directly back to Central Government.
5. The Government continues with consultation and research on further significant changes to the existing BRR system, which is linked to the phasing out of RSG and the eventual design of new proposals for local government funding which, it is hoped, will simplify and make the whole distribution mechanism for local government funding more transparent. It is anticipated that the redesign of the BRR and SFA arrangements will not impact until 2020/21.
6. A business rates pool has operated within Essex since 2016, but due to uncertainties regarding the Council's position in relation to business rates collection and its potential claims against the Government Safety Net, the Council did not join the pool until the current financial year (2018/19).

ISSUES/PROPOSALS

MHCLG Invitation to Local Councils in England to Pilot 75 Percent Business Rates Retention in 2019/20

7. The Government has already initiated one pilot scheme for 100 percent BRR operating in five specifically urban council areas with effect from 1 April 2017. In addition the 2017 Autumn Budget included confirmation that London would

become a 100 percent business rates retention pilot area for the duration of the 2018/19 financial year and the provisional Local Government Finance Settlement in December 2017 announced a further ten 100 percent business rates retention pilots for the duration of the 2018/19 financial year in local council areas across England. These pilots retain 100 percent of business rates income and forego some existing grants. Over the pilot period, which will be continuing on into 2018/19, they will retain all of their growth in business rates income. Harlow was part of an Essex pilot bid as reported to Cabinet in October 2017 but unfortunately the bid was not successful for the 2018/19 financial year.

8. In an announcement made by MHCLG on 24 July 2018 the Government is interested in exploring how 75 percent rates retention (not the previously announced 100 percent) can operate across more than one council to promote financial sustainability and to support coherent strategic decision-making across functional economic areas. Accordingly, the Government would like to see councils form pools (either on existing or revised boundaries) and, with agreement in place from all participating councils, to apply jointly for pilot status. We would expect a proposed pool to comprise a county council and all of the associated district councils; a group of unitary councils; or a two-tier area and adjoining unitary councils, but it should extend across a functional economic area. Proposals will need to set out tier split arrangements of all precepting councils, including Fire and Rescue authorities
9. In addition, the pilots will test council's administration. For example, how they tackle collection avoidance, technical planning for implementation, and will look at system maintenance, including how the accounting, data collection and IT systems will work.
10. The new pilots will run for the financial year 2019/20 only. As in previous bidding processes, councils selected as pilots for will be expected to forego the Revenue Support Grant (RSG) and the Rural Services Grant (the Council only receives the former of these two grants). The value of the grant foregone will be taken into account in setting revised tariffs and top-ups, which will be used to ensure that the changes are cost neutral, except for the value of any growth retained.
11. Each pool will have a single safety net threshold determined on the basis of the Pool's overall Baseline Funding Level and Business Rates Baseline. However, the Pool's safety net threshold will be set at 95 percent of its recalculated baseline funding level, instead of the existing 92.5 percent. This represents a favourable adjustment to reflect the additional risk stemming from greater retention. Pilots will operate with a 'zero levy', as is the case for the current 2018/19 pilot areas. Therefore, it is retention from potential growth of Business Rates over and above a council's Business Rates Baseline that presents a notable attraction for participating councils.
12. To be accepted as a pilot for 2019/20, the MHCLG has indicated that an agreement must be secured locally from all relevant councils to be designated as a pool for 2019/20. Therefore, if one of the councils within a functional economic area declines the invitation, the likelihood is that the remaining councils will not be accepted into the pilot scheme.

13. Pooled areas should propose a split for sharing additional growth. Pooled areas will be required to demonstrate how additional growth will be used to promote the financial stability and sustainability of the pooled area. In addition, it is expected that some retained income from growth to be invested to encourage further growth across the area.
14. The pilot that commenced in 2017/18 is protected by a 'no detriment' clause, guaranteeing that these areas will not be worse off as a result of participating in the pilot and the invitation to bid published by the Government has indicated that this will also apply to any pilots approved for 2019/20.
15. Any proposals for new pilots must be received by the MHCLG on or before midnight Tuesday 25 September 2018.
16. It is expected that successful applications will be announced before or alongside the publication of the draft local government finance settlement, which usually occurs in mid-December each year.

Proposal for an Essex Wide Pilot

17. The County Council has initiated a series of discussions and communications to explore the merits of forming an Essex pilot. Not only are there potential benefits from annual retaining Business Rates surpluses, the Council recognises that participating in the pilot provides a key opportunity to help shape the fair distribution of local government funding in to the future.
18. After preliminary consultation with and general support from the county's district councils, it is recognised there is potential scope to benefit from participating in the Pilot.
19. Given the Government's requirement for all councils within a pilot area to subscribe to a pilot bid, the County Council continues to engage with all relevant councils, which comprises the twelve Essex district councils, unitary councils and fire authority (police authorities do not participate in Business Rates funding).
20. With Business Rates growth opportunities extending across various Essex councils from new business development, there is potential for county wide gains. However, these gains must be weighed against the risks that exist both within the local economy and business sector and the inherent operational funding formulae agreed for the pilot scheme.
21. Ahead of the outcomes from these enquiries, the consensus view of the Essex councils about submitting a bid is that, if there are clear financial benefits to be derived from a new Essex pool that significantly exceed the potential risks, it will be beneficial for a collaborative bid to be made. The findings from the lines of enquiry will clearly influence each council's position.
22. There will need to be one lead council to submit the bid to MHCLG, although meeting the deadline of 27 September will require a swift and intense process of negotiations between the relevant Essex councils for the purpose of defining the

pilot group's operational funding formulae, setting strategies to manage risks and defining how new local business growth will be supported within the geographical catchment area.

Conclusions

23. With limited information available at the time of writing this report it is not possible at this time to determine the overall impact on the Council and whether, on balance, that would be beneficial or detrimental. Therefore, Cabinet is requested to provide delegated authority to the Head of Finance, as the Council's statutory officer under Section 151 of the Local Government Act 1972, in consultation with the Leader of the Council, and the Portfolio Holder for Resources, to give notice formally of the Council's intention to accept or to decline to opt into the 75 percent BRR Pilot Programme with the other constituent Essex councils as deemed most favourable to the Council.

IMPLICATIONS

Place (Includes Sustainability)

None specific.

Author: Jane Greer, Head of Community Wellbeing on behalf of Graeme Bloomer, Head of Place

Finance (Includes ICT)

Outline financial implications are contained within the report. Outcomes of a financial modelling exercise, dialogue with MHCLG and negotiations with authorities comprising the proposed Essex pilot should provide an insight into the benefits, or otherwise, of participating in the 75 percent BRR pilot scheme.

Author: Simon Freeman, Head of Finance

Housing

None specific.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

None specific.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

None specific.

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

None.

Background Papers

MHCLG – Business rates retention pilots 2019 to 2020 invitation to apply

Glossary of terms/abbreviations used

Baseline Funding Level – The baseline funding level can be thought of as the relative amount of funding that the government considered an authority needed from business rates at the time the BRR scheme was set up in 2013-14, indexed thereafter by the change in the small business rates multiplier.

Business Rates Baseline – An authority's business rates baseline represents the amount of business rates that in 2013-14 government expected an authority to receive from its share of business rates. Thereafter, it has been effectively indexed by the change in the small business rates multiplier.

BRR – Business Rates Retention

MHCLG – Ministry of Housing, Communities and Local Government

MTFS – Medium Term Financial Strategy

RSG – Revenue Support Grant

SFA – Settlement Funding Assessment

REPORT TO: CABINET

DATE: 13 SEPTEMBER 2018

TITLE: REFERRAL FROM SCRUTINY COMMITTEE – CIVIC PRIDE AND EDUCATION

PORTFOLIO HOLDER: COUNCILLOR EUGENIE HARVEY, PORTFOLIO HOLDER FOR COMMUNITY AND WELLBEING

LEAD OFFICER: JANE GREER, HEAD OF COMMUNITY WELLBEING (01279) 446406

CONTRIBUTING OFFICER: BECCI COURT, PROJECT DEVELOPMENT CO-ORDINATOR (01279) 446455

This is not a Key Decision
It is on the Forward Plan as Decision Number I009319
Call-in Procedures may apply
This decision will affect no ward specifically.

RECOMMENDED that:

- A** Cabinet supports the events and activities with a theme of Civic Pride, as set out in paragraphs 10 to 13 of the original report attached as Appendix 1.

REASON FOR DECISION

- A** The Scrutiny Committee considered a report on Civic Pride and Education at its meeting on 24 July 2018 and asked Cabinet to support the events and activities set out in the report to the Committee attached as Appendix 1.

BACKGROUND

1. At its meeting on 24 July, the Scrutiny Committee received a report on Civic Pride and Education.
2. The Committee noted the support and engagement with local groups and residents as part of the Harlow is 70 celebrations.

ISSUES/PROPOSALS

3. The Committee has asked Cabinet to support the events and activities as set out in paragraphs 10 to 13 of the report attached as Appendix 1.

IMPLICATIONS

Implications of the recommended decision are outlined in the 'Implications' section of the original report, which is attached as Appendix 1.

Appendices

Appendix 1 – Original report to the Scrutiny Committee, 'Civic Pride and Education – Final Report'

Background Papers

None.

Glossary of terms/abbreviations used

None.

Appendix 1

REPORT TO: SCRUTINY COMMITTEE

DATE: 24 JULY 2018

TITLE: CIVIC PRIDE AND EDUCATION – FINAL REPORT

LEAD OFFICER: JANE GREER, HEAD OF COMMUNITY WELLBEING (01279) 446406

CONTRIBUTING OFFICER: BECCI COURT, PROJECT DEVELOPMENT CO-ORDINATOR (01279) 446455

RECOMMENDED that the Committee:

- A** Notes the support and engagement with local groups and residents to support events and activities as part of the Harlow is 70 birthday celebrations.
- B** Recommends to Cabinet that the Council supports events and activities with a theme of Civic Pride, as set out in paragraphs 10 to 13 of this report.

BACKGROUND

1. On 25 March 1947 Harlow was officially designated a new town and during 2017 and early 2018 there were a series of events to mark the town's seventieth anniversary. The year also celebrated Harlow Town Park's sixtieth anniversary and events took place to celebrate both of these occasions.
2. In January 2017 the Scrutiny committee received a scoping report and agreed that the focus of the review and any actions arising from it should be the Harlow seventieth Birthday Celebrations.

ISSUES/PROPOSALS

Harlow at 70

3. The first event of the seventieth year was a spring clean of Harlow, with a litter pick taking place in local areas. This showcased how much civic pride already exists within the community of Harlow.
4. The 'Harlow is 70' logo was initiated as a joint collaboration between Harlow College and local design agencies. It was displayed on various buildings around the town and appeared on promotional materials for the celebratory events and activities that took place.
5. Local community organisations were invited to take part in the celebrations, and support and part funding for events was provided by the Council in help enable activities to take place. A range of events took place many of which promoted civic pride and celebrated many achievements, which included the arts and sport.

6. The Council provided funding of £20,000 over half of which was used to support community events, community groups and individuals through the allocation of up to £500 per bid as a contribution towards their event. This initiative was extremely well received and was a catalyst that enabled many of the events to take place.
7. Many events and activities took place, these included :
 - a) The Great British Spring Clean – over 100 volunteers participated in a community litter pick in their local areas;
 - b) Heritage projects - 'Why I Came Here' - recorded interviews with community leaders and residents, sharing their experiences of living in the town;
 - c) Time Capsule – working in collaboration with the Harvey Centre, many memories and pieces of local artwork were showcased before being archived in the capsule;
 - d) History talks – over 550 people participated in local history talks which were provided by a local historian;
 - e) Artwork – a large scale mural was created for parts of the Town Centre in collaboration with Essex County Council and the national Book Festival;
 - f) School music concerts – over 500 children played instruments and sang to their community;
 - g) School competitions – football and rugby festivals with over 800 children competing;
 - h) A Carnival was organised by Council officers which saw a number of local organisations involved and many people lining the streets; and
 - i) A Harlow Colouring book was produced, with drawings from around the town for all ages to colour in.
8. In total, more than 20,000 people participated in all of the events that took place in 2017/18 to celebrate Harlow's seventieth birthday (excluding numbers of those attending the fireworks display). The events received much positive feedback, for example:
 - a) Communications have improved tremendously during Harlow 70 year and helped everyone realise what a great place Harlow is.'
 - b) It is a thoroughly deserved 'well done' from me and please continue with more information for events in 2018.'

9. The Council's Communications team have developed a short film which includes many of the highlights from 2017.

Taking the Legacy Forward

10. Many requests for further activities and local event information have been made following the success of the Harlow is 70 campaign and many people have expressed an interest to participate in or receive information for further events.
11. In setting the 2018/19 budget, ongoing funding of £10,000 has now been included in the general fund budget to further help and support community initiatives in the future. It is recommended the Scrutiny committee recommend to Cabinet that a similar approach is taken to that of the Harlow is 70 celebration funds. Community groups and others will be able to bid for funding of up to £500 in order to facilitate events or other initiatives that support the theme of civic pride.
12. The Council has approved a budget of £28,000 to support the ongoing funding of an annual Carnival with the current event taking place on 26 August. It is hoped that this will build on the success of 2017.
13. It is hoped that funding for community events and the carnival will be available for future years for the foreseeable future, thereby providing a legacy from the Harlow is 70 celebrations.

IMPLICATIONS

Place (Includes Sustainability)

None specific.

Author: Graeme Bloomer, Head of Place

Finance (Includes ICT)

There are specific financial implications resulting from the report. Should there be any requirement for any additional funding to implement and/or support any of the initiatives they will either be met from within existing budgets or be subject to the normal annual budget process.

Author: Simon Freeman, Head of Finance

Housing

None specific.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

As contained within the report.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

The concept of civic pride and inclusive celebrations fulfils the public sector equality duty to foster good relations between different people.

Specific governance arrangements around the bidding process for financial support will help ensure this purpose is maintained.

Author: Colleen O'Boyle, Interim Head of Governance

Appendices

None.

Background Papers

None.

Glossary of terms/abbreviations used

None.

**MINUTES OF THE SHAREHOLDER SUB COMMITTEE
HELD ON**

25 July 2018

7.30 - 8.30 pm

PRESENT

Sub Committee Members

Councillor Mark Ingall (Chair)
Councillor Joel Charles
Councillor Danny Purton

Officers

Julie Galvin, Solicitor
Andrew Murray, Head of Housing
Adam Rees, Governance Support Officer

Additional Attendees

Michael Harrowven, Non-Executive Chair of the HTS (Property and Environment) Limited Board
John Phillips, Managing Director of HTS (Property and Environment) Limited

30. **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Andrew Johnson and Mark Wilkinson.

31. **DECLARATIONS OF INTEREST**

None.

32. **MINUTES**

RESOLVED that the minutes of the meeting held on 13 February 2018 are agreed as a correct record and signed by the Leader.

33. **MATTERS ARISING**

a) Minute 23 - Operational and Performance Reports

In response to a question by Councillor Charles, John Phillips, Managing Director of HTS (Property and Environment) Ltd, explained that the original minute request scope has been enlarged to report on improving access to reporting repairs requests and resource planning (planned repairs). This will include an appraisal of the use of an online portal would be considered by the Sub-Committee in October as part of the Customer Access Review. The Review would look at all methods the public could use to contact HTS.

In response to a further question by Councillor Charles, the Chair said the original priorities were still in place. In addition to these, following the Cabinet meeting on 14 June, house building and the creation of a regeneration company had been added as strategic priorities. Any further revisions of the priorities would come through Cabinet.

b) Minute 26 - Environmental Improvement Plan - Verbal Update

Councillor Charles whether Councillors were now being contacted about potential works in their wards. In reply, Councillor Purton said that the standard list of works was still being developed, and that this was being done in consultation with residents groups. He expected that the list would be finalised in August.

34. **SUB-COMMITTEE WORK PLAN**

RESOLVED that the Work Plan was noted.

35. **OPERATIONAL AND PERFORMANCE REPORTS**

a) Performance Reports Balanced Scorecard

The Sub-Committee received a report which highlighted the operational and financial performance for HTS (Property and Environment) Ltd. The Company had achieved 97 percent of its KPIs up to 31 March 2018, and 100 percent up to 31 May, an outturn of retained profit totalling £412,000 to 31 March 2018, and a favourable forecast for the year of £1,095,000 to 31 March 2019.

The Sub-Committee welcomed the detail of the report and noted that HTS had achieved over 500,000 work hours without a reported accident.

John Phillips drew attention to the two KPIs in March which had been below target. The first was Detritus and Weed Growth which had seen a significant drop in performance for the quarter. However, this appeared to be a blip as performance was now above target as reported in Quarter 1.

Tree works were also below target for the final quarter of 2017/18. It was explained that tree works were carried out by a small team and the adverse weather at the beginning of the year caused issues. Performance was back above target in Quarter 1.

Councillor Purton requested that a report was brought to the next meeting of the Sub-Committee on the use of HTS vehicles outside of work hours.

RESOLVED that:

- A** The Sub-Committee acknowledged the performance and financial position set out in paragraphs 3-15 of the report as follows:

- i) HTS (Property & Environment) Ltd (HTS) achieved 97 percent to 31 March 2018 and 100 percent 30 May 2018 against the suite of major and minor KPIs that govern the contract; and
- ii) An outturn of retained profit totalling £412,000 to 31 March 2018. A favourable forecast for the year to £1,095,000 to 31 March 2019.

b) Complaints Analysis

The Sub-Committee received a report which summarised complaints to the months of March and May 2018. John Phillips said that complaints were not the only measure of customer service and that the number of plaudits received exceeded the number of complaints. It was agreed that the reports on plaudits received would be circulated to the Sub-Committee and that they would be incorporated into future complaints reports.

RESOLVED that the Sub-Committee:

A Noted the report and summary of complaints to the month of March 2018 and May 2018, as set out in paragraphs 2 to 4 of the report as follows:

- i) HTS (Property & Environment) Ltd achieved a ratio of 0.95 percent against total transactions to March 2018 of 48,568 and 0.97 percent against total transactions to May 2018 of 6,986.

c) Risk Register

The Sub-Committee received a report which set out the strategic risks to HTS. Andrew Murray, Head of Housing explained that the reporting of risks was now aligned to the Council's.

John Phillips outlined the work which had been undertaken to ensure that HTS was compliant with GDPR. Councillor Charles said that GDPR required some companies to undergo an extensive data audit and questioned whether HTS was at the threshold. In reply, John Phillips he would respond outside of the meeting, but added that ISO 270001 gap analysis was being undertaken.

The Sub-Committee discussed future business growth. John Phillips said that the risks associated with third party growth had to be managed, and that the initial focus was on growing the HTS brand locally. Michael Harrowven, Non-Executive Chair of the HTS (Property and Environment) Limited Board, added that the focus was on the Council's priority of more and better housing.

RESOLVED that:

- A** The Sub-Committee noted the strategic risks as relating to HTS (Property and Environment) Ltd (HTS) together with their analysis and mitigation outlined in Paragraphs 4 to 6 of the report.

36. **DEVELOPMENT AND IMPROVEMENT PLAN - EFFICIENCY CASE STUDIES (2017-18)**

The Sub-Committee received a report setting out a case study as part of the development and improvement plan.

RESOLVED that the Sub-Committee noted the report.

37. **REFERENCES FROM THE HTS BOARD**

- a) Appointment of External Auditors to the HTS Group

The Sub-Committee received a report which recommended that it noted the appointment of Ensors, Chartered Accountants as the external auditor for HTS.

RESOLVED that the Sub-Committee noted:

- A** Noted the Board's appointment of Ensors, Chartered Accountants, as external auditors and accountants to HTS (Property and Environment) Ltd (HTS) for 2018/19.
- B** Noted the terms and conditions of the appointment agreed by the Company Secretary.

38. **REFERENCES FROM CABINET**

- a) Business Plan Amendments

The Sub-Committee received a report which sought approval for amendments to the Business Plan following a decision by Cabinet on 14 June.

RESOLVED that the Sub-Committee:

- A** Approved the Board's proposed amendment to the current Business Plan, in line with the Cabinet decision on 14 June 2018.
- B** Noted the revised Business Plan (2018/22) timetable.

39. **REVISED BALANCED SCORECARD 2018-2022**

The Sub-Committee received a report which recommended the approval of revised Balanced Scorecard targets for 2018/19.

The Sub-Committee discussed how improvements to the culture could be measured. Michael Harrowven said that the target was about encouraging change and allowing the workforce to put forward ideas for improvement.

RESOLVED that:

- A** The Sub Committee approved the revised Balanced Scorecard targets for 2018/19 onwards as outlined in Appendix A to the report.

40. **MATTERS OF URGENT BUSINESS**

None.

41. **DATE OF NEXT MEETING**

24 October 2018.

CHAIR OF THE SUB COMMITTEE

**MINUTES OF THE CABINET OVERVIEW WORKING GROUP
HELD ON**

9 August 2018

7.30 - 8.30 pm

PRESENT**Overview Working Group Members**

Councillor Ian Beckett (Chair)
Councillor Tony Edwards (Vice-Chair)
Councillor David Carter
Councillor Simon Carter
Councillor Jean Clark
Councillor Michael Garnett
Councillor Maggie Hulcoop

Officers

Simon Freeman, Head of Finance
Jane Greer, Head of Community Wellbeing
Adam Rees, Governance Support Officer

Additional Attendees

Alan Phelps, NPS Group

1. APOLOGIES FOR ABSENCE

None.

2. DECLARATIONS OF INTEREST

None.

3. MINUTES

RESOLVED that the minutes of the meeting held on 12 April 2018 be agreed as a correct record.

4. MATTERS ARISING

None.

5. NON-HOUSING ASSET MANAGEMENT STRATEGY - PRESENTATION

Alan Phelps, NPS Group, gave a presentation (a copy of the presentation is appended to the minutes) on part one of the Non-Housing Asset Management Strategy, which set out the operating context and strategic direction of the Strategy. In particular he highlighted the proposal to

segment the Council's portfolio into four portfolios; Community, Operational, Commercial, and Opportunity.

Jane Greer, Head of Community Wellbeing, said it was recommended that a focus group be established to consider part one of the Strategy. The Group would then be able to consider part two of the Strategy, which would look at the existing sites and facilities within the Council's portfolio.

RESOLVED that:

A The presentation be noted.

B A focus group comprising of Councillors David Carter, Simon Carter, Mike Garnett and Maggie Hulcoop be established to consider part one of the Non-Housing Asset Management Strategy.

6. **WORK PLAN**

RESOLVED that the Work Plan be noted.

7. **MATTERS OF URGENT BUSINESS**

None.

CHAIR OF THE OVERVIEW
WORKING GROUP

Non-Housing Asset Strategy

Alan Phelps

The Strategy in Essence

- ▶ Harlow faces challenges & opportunities
- ▶ Property must be used to ensure these opportunities are realised
- ▶ Property is both cash consuming & cash generating – plays an important part in supporting the Council’s revenue budget
- ▶ Property has long term latent value that can be exploited through development or strategic use
- ▶ Strategy is focussed on identifying and harnessing this latent ‘opportunity value’
- ▶ May require new approaches (capacity, expertise & delivery models)

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Purpose

- Raise profile of property as a strategic resource
- Set long term direction for its management
- Set the context for decision making on property – now & in the future
- Identify actions to take the strategy forward
- Promote a common understanding of property

- Present a radical but practical solution to meet the Council's needs

5471

Scope & Development Process

- Property (but excluding housing assets)
- 5 year+ time horizon
- Two parts
 - Strategic (non-site specific)
 - Operational (site specific)
- Collaborative
 - On-site + working with Property & facilities
 - Engagement – at outset / during development / validation

Overview of Portfolio

7473

Total Number of Properties			
493			
Value	Cost	Income	Condition
£83.315M For capital accounting purposes	£3.504M Annual running cost	£6.385M From lettings	£12.420M Estimated repair backlog

Operating Context (1)

National

- Public spending constraints
- Localism & place shaping
- Partnership working (OPE)
- Health & care integration
- Naylor review
- Population growth
- Housing need

Regional / Local

- M11 corridor + J7a
- Digital Innovation Zone (DIZ)
- Harlow & Gilston Garden town
- SELEP
- Local Plan
- Town Centre Action Plan
- Public Science Health Campus
- Enterprise Zone

Operating Context (2)

Resource Pressures

- ▶ Potential shortfall in budget if savings not realised (over medium term)
- ▶ Declining capital receipts leading to pressure to borrow
- ▶ Property currently contributes to revenue budget – seeking to increase this

Challenges in the Portfolio

- ▶ Legacy of underinvestment (in portfolio)
- ▶ Profile of property
- ▶ Governance arrangements
- ▶ Statutory compliance in commercial portfolio (tenant obligations)

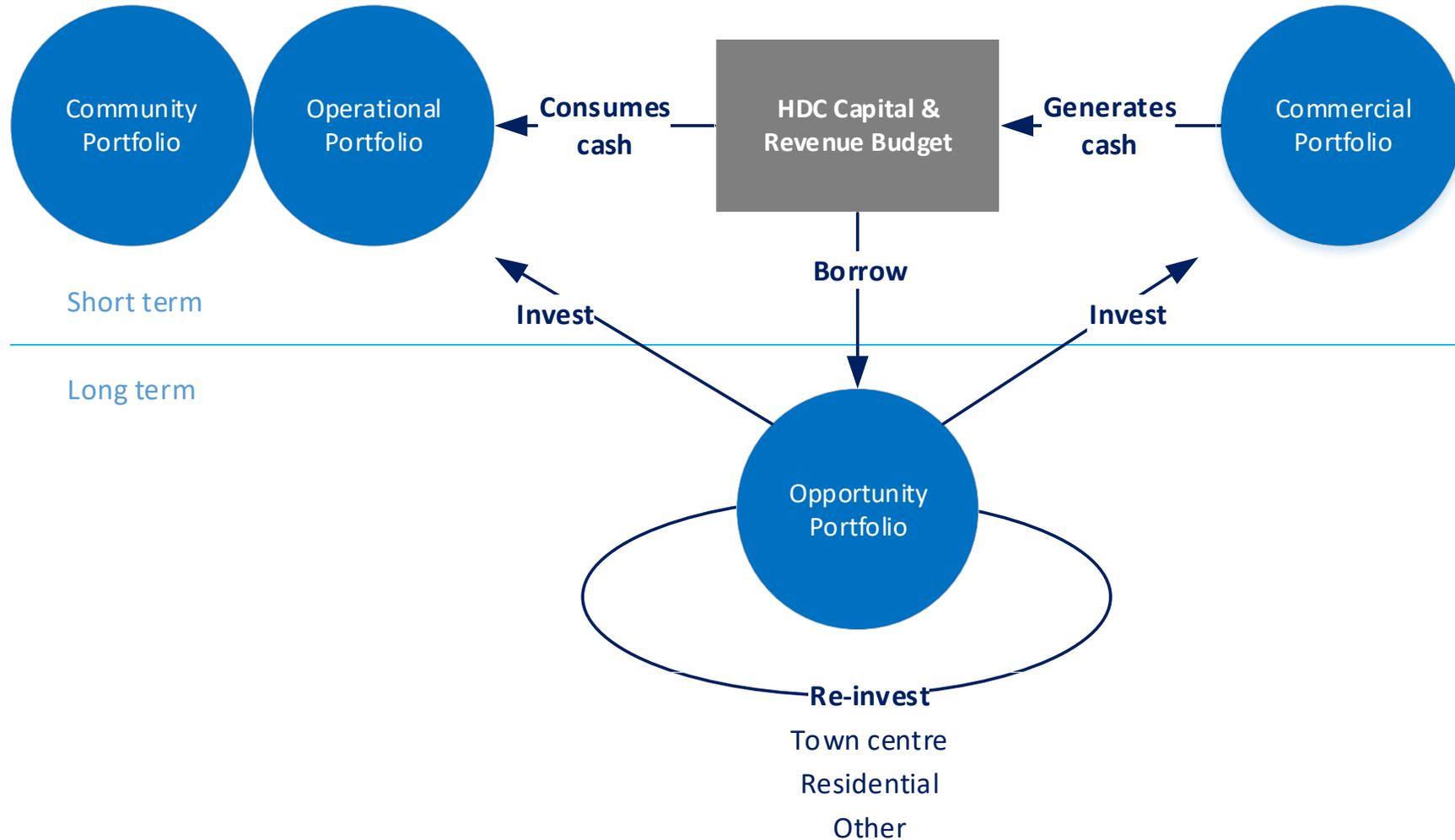
Strategic Direction & Key themes

Using property to promote renewal of the public realm and to ensure the Council's financial security

- Segmenting the portfolio
- Growing the opportunity portfolio
- Partnership working
- Enhancing delivery capability
- Evaluate delivery mechanisms
- Business as usual

1470

Strategic Direction & Key themes



1477

Making it Happen!

- ▶ Key actions identified under each theme – these are in addition to ‘business as usual’

Key Issues

- ▶ Commitment to the strategy & identified concept of portfolio segmentation
- ▶ Council’s attitude to risk
- ▶ Organisational capacity & expertise

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Any Questions?

Thank you

1879

Operating Context

National Influences

- Public expenditure constraints
- Public health reform
- Localism
- Place shaping
- Partnership working
- One Public Estate
- Integrating Health & Social Care
- Naylor Report
- Population growth & housing need

Regional & Local Influences

- London – Cambridge corridor
- Digital Innovation Zone (DIZ)
- Harlow & Gilston Garden town
- SELEP
- Local Plan
- Town Centre Action Plan
- Enterprise Zone
- Public Science Health Campus

Problems & Opportunities in the Portfolio

- Legacy of under investment
- Profile of Property
- Governance
- Statutory Compliance in the Commercial portfolio

Corporate Priorities

More & better housing

Regeneration and a thriving economy

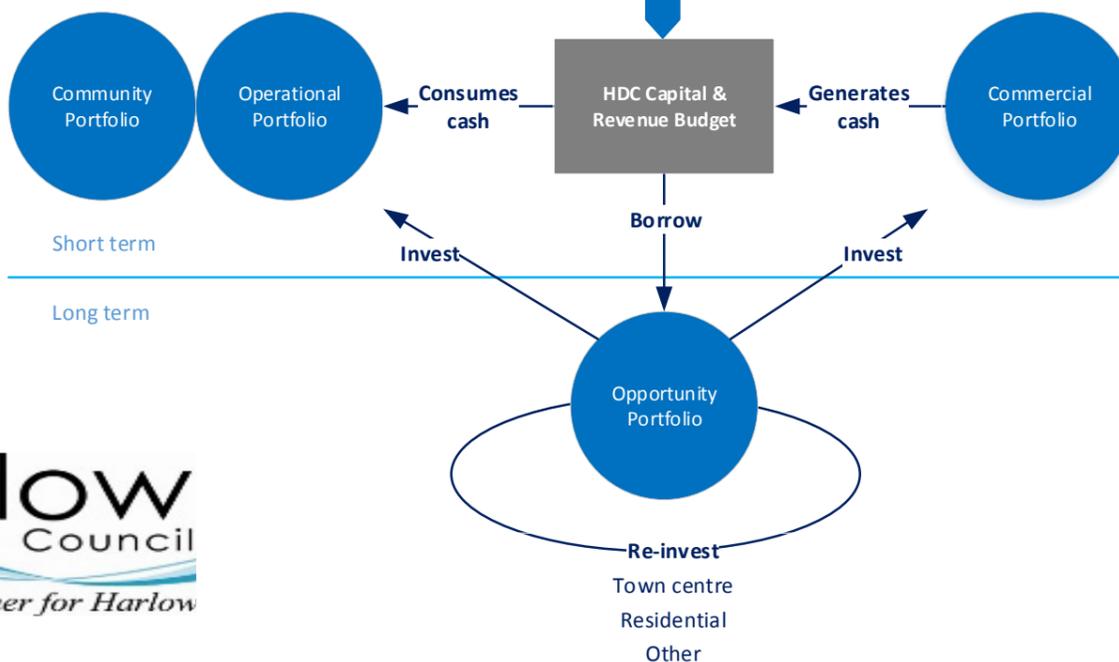
Well-being and social inclusion

A clean and green environment

Successful children and young people

Strategic Direction

Using property to promote renewal of public realm and to ensure the Council's financial security



Segmenting the portfolio

Dividing the portfolio into discrete sub-portfolios will allow recognition of their different characteristics & needs & to give a specific management focus to each

Growing the opportunity portfolio

It will be important to identify sites with long term value which can be exploited for the benefit of the Council & the community to be added to the opportunity portfolio

Partnership working

Partnership working will improve resource efficiency & support public service integration. HDC will need to work with partners to shared asset where possible

Enhancing delivery capability

Develop the capacity, governance, procedural & cultural requirements associated with developing a 'step change' in the scale & ambition of delivery

Evaluate delivery mechanisms

Evaluate alternative methods of developing out sites with latent value through use of strategic partners & alternative asset ownership models

'Business as usual'

Undertake the ongoing operational activities associated with managing the portfolio on day to day basis

Making it Happen – A Framework for Action

- | | | |
|---|--|---|
| <ul style="list-style-type: none"> • Define rationale & management objectives for portfolios • Identify key performance measures for each portfolio • Review assets to categorise into the portfolio(s) • Review sites to identify any with latent dev. potential • Identify & define options for developing value (feasibility) • Re-designate identified sites as part of opportunity portfolio | <ul style="list-style-type: none"> • Create 'concordat' to secure commitment to joint working • Locality review - identify scenarios for town centre • Review potential for funding support via 1 Public Estate • Establish Strategic Property Board to oversee strategy • Assess capability & capacity of Property & Facilities Team • Identify lead focus to progress on opportunity portfolio | <ul style="list-style-type: none"> • Review capital prioritisation process – Agree approach • Move to single source of data based on Technology Forge • Identify options for developing out opportunity assets • Evaluate options to determine 'best fit' with HDC culture • Develop OBC for preferred delivery mechanisms • For 'business as usual' see Property Asset Strategy - Part 2 |
|---|--|---|

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Agenda Item 22

Document is Restricted