

Harlow Local Development Plan Programme Management Report

Project	Local Development Plan Production Support
Client	Harlow Council
Date	1 June 2017
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1.0 Introduction

Harlow Council is currently producing a Local Development Plan (LDP) which will shape and guide development in the area over the period 2011 - 2031. The plan will set out a spatial vision, supported by Strategic Policies and detailed Development Management Policies together with a Policies Map. The final content of the LDP will be endorsed by the Council's Cabinet and then be referred to Council at the appropriate stage in its production, prior to being submitted to the Planning Inspectorate for an independent Examination before an Inspector. The Inspector will examine the Plan against the following tests of soundness:

- 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;
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

In addition the Inspector will assess legal compliance and whether the Council has met the duty to co-operate (DTC). This is a legal duty that must be fulfilled in preparing the plan and any failure in this regard cannot be rectified after the LDP has been submitted for examination.

The next key stage is for the Council to complete the Regulation 19 Consultation on the LDP before it is submitted for Examination.

Evidence has been prepared to support the policies and proposals of the Local Development Plan and this has been used to establish future growth requirements. This evidence has considered the wider social, economic and environmental characteristics of Harlow. The technical studies are in relation to the five spatial themes around which Harlow's LDP is being developed which are Place Shaping, Housing, Prosperity, Infrastructure and Lifestyles.

Harlow Council has appointed Stace LLP to produce a strategic master programme for the final production of the LDP, detailing the current position and interdependencies of the different work streams associated with it, as well as this commentary report on the current progress, challenges and opportunities with the production of the LDP, ahead of the next key milestone of issuing the LDP for Regulation 19 Consultation. The report and programme are required for the 22nd June Cabinet meeting.

2.0 Production of the Report

This report and the accompanying programme and risk register have been produced following a series of briefing sessions between Harlow Council officers, the Cabinet Portfolio Holder and Stace LLP, held 27 April, 9, 17, 23, & 25 May and 1 June 2017. The meetings were used to discuss the progress to date regarding production of the LDP, the opportunities, risks and challenges faced by Harlow Council, including a Duty to Co-operate with neighbouring Councils, a recent announcement that there is to be a new Harlow & Gllston Garden Town development and several matters outside of Harlow Council's control involving third parties, which are integral to the production of a sound LDP. The discussions considered the following matters and the findings of associated studies relating to production of the LDP in order to enable assessment of the opportunities and risks, informing this report;

- Duty to Co-Operate / Garden Town
- Technical Evidence Base
 - Population
 - Housing Requirements
 - Water, Sewage & Drainage
 - Infrastructure requirements and associated viability and delivery assessment
 - Transport Modelling at the detailed level
 - Retail Study
 - Employment Study
 - Health Facilities
 - Playing Pitches Study
 - Gypsy & Traveller Policy
 - SA/SEA/HRA/EQIA/HIA
- Progress to Date and Timeline Moving Forward
- Process for Endorsement & Production of the Local Plan

3.0 Duty to Co-operate / Garden Town

In the production of the LDP, Harlow Council must give wider consideration to its mandatory obligation of liaising with adjacent Councils under the Duty to Co-operate, which requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies on strategic matters in Local Development Plans. This takes place via the Co-operation for Sustainable Development Board. Local planning authorities should make every effort to secure the necessary cooperation on strategic cross-boundary matters before they submit their Local Development Plans for examination.

Given Harlow's geographic location and through the Co-operation for Sustainable Development Board, the Council has been working closely with:

- Epping Forest District Council
- East Hertfordshire District Council
- Uttlesford District Council
- Essex County Council
- Hertfordshire County Council

In addition to the above, this has involved engagement with the following bodies:

- the Environment Agency
- Highways England
- Princess Alexandra Hospital
- Sport England
- Natural England
- Lea Valley Regional Park Authority
- London Stansted Cambridge Consortium
- City of London Corporation (Conservators of Epping Forest)
- Affinity Water
- Thames Water

This process is also crucial to the production of Harlow Council's LDP due to the cross-boundary close liaison that is required for the Harlow & Gillston Garden Town initiative which is now underway, involving East Hertfordshire District Council, Epping Forest District Council and Harlow District Council among others.

It is recognised that a strategic approach, beyond the District boundaries is required to ensure the delivery of the Garden Town, supported by co-ordinated Local Development Plans for the involved authorities. The Co-operation for Sustainable Development Board has, therefore, been established between the neighbouring authorities to discuss key strategic issues and ensure consistency in approach, as well as identifying the strategic challenges where the authorities can help one another to achieve the required outputs such as housing unit numbers, employment opportunities and transport connectivity. A consistent approach is challenging as each Authority also seeks to protect its own position and so a careful balance between competing interests needs to be achieved.

4.0 Strategic Inputs

As identified within Section 2.0 above, there are several strategic inputs to the production of the LDP which involve the production of different studies, providing an evidence base upon which Harlow Council supports the LDP. The studies are all interlinked and can have varying impacts upon one another and the resultant policies and proposals within the LDP which Harlow Council take forward. For example, the housing requirements must be defined to understand the infrastructure required to support them.

4.1 Housing Requirements

The key strategic issues facing Harlow Council relating to the Strategic Housing Need are:

- Confirmation of whether a second transport network access route to the strategic, proposed development site to the north east of Harlow is required;
- Implications of the requirement for a secondary access point from this strategic site in terms of the viability and deliverability of this site;
- Demonstrating deliverability of the access routes to all the strategic sites in and around Harlow and the neighbouring Districts, given that many of the accesses are in multiple land ownerships and may require different mitigation measures;
- Ensuring sufficient affordable housing is provided to meet identified need.

A Strategic Housing Market Assessment has been produced and this key document identifies housing need across the wider market area and in Harlow. This identifies that across the housing market area 51,100 homes are required during

the Local Development Plan period, with 16,000 homes across the wider Harlow area, including 9,200 homes within Harlow itself.

Agreement to the number of homes to be provided is not at risk as a Memorandum of Understanding has been agreed between Harlow, Epping Forest, and East Herts. District Councils to support the delivery of the housing numbers required and their spatial distribution; with the Garden Town initiative itself providing a framework to shape, guide and deliver the development. Harlow, Epping Forest and East Herts Councils have been holding Developers' Forums to ensure that private sector house builders are aware of the LDP and strategic views of the Councils with regards to delivery of the housing numbers and identification of viable sites.

A key risk has recently been identified following further work by Essex County Council relating to capacity and delivery of a secondary road link that would be required to access the development site to the north east of Harlow. Modelling of the transport connectivity requirements indicates that until a second access route into the strategic site is delivered there is a potential impact upon short term delivery of housing on this site and in Harlow.

If the timing of the delivery of the strategic housing site north east of Harlow is delayed, Harlow Council must consider the availability of alternative sites and would need to consider how any short term, unmet housing need would have to be accommodated with the adjacent Councils through the Co-operation for Sustainable Development Board, which may then require amendment to the MOU.

The Council needs to ensure the deliverability of the housing sites identified in the LDP and the Infrastructure Viability Delivery Plan will identify whether these housing sites are viable. Deliverability must be proved to ensure the LDP satisfies the "test of soundness" when submitted to the Inspector.

There is also a risk related to the delivery of the proposed new Junction 7a for the M11 motorway, which is the responsibility of Essex County Council. It is understood scheme proposals will be submitted to Planning Committee in June 2017. The timing/success of the application and latterly the works may impact upon the LDP proposals for Harlow Council, given the close liaison that is taking place with neighbouring Districts and emerging needs for competing land usage pressures to be agreed upon.

4.2 Water, Sewerage & Drainage

The key strategic risks for the LDP associated with water, sewerage & drainage provision are;

- Timescale for production of hydraulic models
- Procuring a Water Cycle Study once the models are available
- Sign off of the Water Cycle Study by the Environment Agency

- Water Cycle Study endorsement with Memorandum of Understanding between the Districts, water authorities and the Environment Agency.

In order to confirm the requirements for potable water, sewerage and drainage which inform the LDP, Harlow Council currently requires input from Affinity Water and Thames Water who need to produce hydraulic models that can inform a joint Water Cycle Study. Once this information is produced then a Water Cycle Study can be procured and commissioned by Harlow Council. It cannot be procured and undertaken without the hydraulic model data. This must then be shared with the Environment Agency for their approval, so that they can confirm the Councils have developed a strategy for water management. Without this, the Environment Agency would object to any submitted LDP.

A specific key issue is that the sewerage company (Thames Water) must complete their modelling in order to confirm that the capacity of the Rye Meads sewage works is sufficient to accommodate the housing numbers to be provided during the LDP period. Confirmation of the housing numbers is linked to the issues identified within 4.1 above and 4.4 below.

At present, this deliverable is a high risk to the timeline for production of the LDP as Harlow Council have been informed that the water companies will not meet their original due date for providing modelling data during July 2017. No revised date has yet been provided. The current climatic conditions indicate that a further delay is likely. This is beyond the control of Harlow Council.

To address this delay, Harlow Council in conjunction with partners in the Cooperation for Sustainable Development Board, have been pro-active and have written to the bodies concerned and central government (DEFRA & CLG) to request support and increased urgency from the water companies. A joint meeting with the water companies and Environment Agency has also been requested within the coming weeks in order to secure an urgent resolution, to define the way forward and in turn allow the Council to complete the LDP. Following completion of the modelling and Water Cycle Study, Harlow Council will need the Environment Agency's agreement that it meets their requirements and that they will sign along with the Water Authorities a Memorandum of Understanding with the Duty to Co-operate Board, before submitting the LDP.

The appended programme assumes that Harlow Council will be able to meet the involved parties by the end of June 2017 in order for this matter to gain traction and proceed in a timely fashion, with the ability to submit proposals to the Environment Agency by the end of November 2017.

4.3 Infrastructure Delivery Study and Viability Assessment

An Infrastructure Delivery Study, and associated Viability Assessment, has been commissioned by Harlow Council, to provide evidence to identify all of the infrastructure that is required to support the growth set out in the emerging LDP. This study will review the requirements for new infrastructure such as utilities, schools and other public services. The Council had originally understood that Essex County Council would undertake this work but in autumn 2016 Essex County

Council informed Harlow Council that it no longer had the capacity, so Harlow Council had to initiate a procurement process in autumn 2016 which did not attract any expressions of interest. The Council has now been able to appoint consultants following the reissue of the tender and the successful bidder has now commenced the process, with the overall timescale being six months for completion of the review.

The Council is currently confident that there is sufficient capacity within the existing natural gas network given studies undertaken for the Enterprise Zone and other largescale projects in the area. There are however concerns regarding the provision of electricity and the Infrastructure Viability Delivery Study is required in order to define the level of risk involved and additional infrastructure necessary to mitigate it.

Whilst sitting alongside the LDP, this is an integral document that will support the identified infrastructure and also establish additional infrastructure requirements not currently identified within the LDP and the findings will need to be considered before the LDP is finalised.

4.4 Transport Modelling and identification of a strategy for Harlow

The key strategic points regarding transport modelling are as follows;

- High level modelling completed
- Transport Memorandum of Understanding agreed
- Site-by-site modelling underway
- Potential knock-on effect of Junction 7a, J7 & J8 capacities for housing deliverability
- The routes and number of access roads required to the strategic housing sites to be agreed
- Cross-district sustainable public transport route from north to south and west to east network connections to be agreed

Harlow Council has received strategic, high level transport modelling data from Essex County Council to feed into the LDP. The next key milestone is to define and complete the site-by-site specific modelling and to identify the necessary mitigation measures. Integral to this is ensuring the strategic housing site to the north east of the town can be delivered including securing a secondary road and access point which Essex County Council have identified as being required. The delivery of this access is anticipated to be complex due to land ownership along the route. Ultimately this could hinder progress and affect Harlow's ability to deliver housing in the short term as set out in the agreed MOU with the other Districts. Over the coming months, the Council will continue to liaise closely with ECC to define the necessity for the secondary access into site(s) and will then review the implications for relocating housing demand and will raise at the Duty

to Co-operate Board if a satisfactory resolution to deliver the short term housing numbers on Harlow's strategic housing site cannot be found. This also relates to Section 4.1 of this report.

In addition to the secondary access to Harlow's strategic housing site a northern crossing has been identified as required from East Herts strategic housing site to the north of Harlow and the location of this may impact on the site's viability due to the potential multiple land ownerships. A meeting was held on 25 May 2017 to review the northern connection and the implications of the proposed route will need to feed into the Infrastructure Delivery Study.

Regarding the proposed M11 junction 7A, Essex County Council have agreed the scheme in principle and are now considering the resultant planning application. A decision on the planning application is expected shortly. Liaison with Highways England will be critical to delivery, regarding connectivity onto the motorway.

4.5 Retail Study

In February 2017 consultants completed the Harlow Retail and Leisure Needs Study. Following the consideration of the report, subsequent clarifications were sought by officers. The report has identified the need for an additional 16,300m² - 18,100m² net additional comparison goods floor space by 2026, increasing to between 35,500m² and 40,200m² net* additional comparison goods floor space by 2033. In addition, between 2,500m² and 3,200m² net additional convenience goods floor space by 2026, increasing to between 3,900m² and 5,500m² net* additional convenience goods floor space by 2033. This is based on the housing growth set out for the wider Harlow area and the focus of this will be within the Town Centre, in accordance with the sequential approach as required by central government guidance. The outcome of the study has led the Council to consider the preparation of a separate Harlow Town Centre Area Action Plan which will provide the detailed policy approach for the area, having regard to the strategic policies of the over-arching LDP. This will provide a catalyst not only to provide the additional retail floor space required but to achieve the regeneration of the town centre. However, if this level of retail floor space cannot be identified within the Harlow Town Centre then there may be implications for other land use allocations identified within the LDP.

The Council must consider the competing land uses and take strategic decisions in order to allow the LDP Plan to be finalised. This links to Sections 4.1 and 4.4 of this report above and Section 4.6 below.

4.6 Employment Study

Following consideration by the Co-operation for Sustainable Development Board a joint Employment Study has been commissioned to establish the quantum of employment land required across the Functional Economic Market Area (FEMA). Initial findings indicate a significant increase of employment land will be required across the four districts in addition to that provided in existing employment areas

and the Enterprise Zone. The next stage is for the Councils to meet with the consultant to interrogate the conclusions so that a robust employment land requirement can be included in the emerging Local Development Plans that are being prepared in the area. With a limited amount of land, there will need to be compromise and/or the involvement of adjoining Councils via the Duty to Co-operate. Following review, the Council must assess the decisions to be taken jointly and agree a Memorandum of Understanding.

4.7 Health Facilities

At present the current Princess Alexandra Hospital site is allocated for housing, with the potential to accommodate 650 new homes. This is one of the key sites the Council identified to contribute toward meeting the housing target for the District in order to deliver the number of homes within the LDP. The Council is currently liaising with the NHS to confirm whether the hospital will be relocated and if relocated whether that is within or beyond the LDP time period (i.e. beyond 2031). If it is not relocated or relocated after the LDP time scale Harlow Council will need to identify an alternate housing site. This exercise is also dependent upon completion of site-by-site transport modelling as identified within Section 4.4 and whether an out-of-town location is viable for the hospital.

Ultimately the Council has no control over the NHS's property strategy or timeline and as such is reliant upon a favourable decision from the NHS team, to consider relocation within the LDP time period. The Council remains positive that with an appropriate level of engagement with ministers and Whitehall departments, the PAH site can be relied upon to deliver the allocated 650 homes within the plan period.

4.8 Playing Pitch Study

The Harlow Playing Pitch Strategy study is nearing completion and it is understood that there is limited potential for playing field land to be allocated for housing land to help upgrade the key playing fields to increase their potential. It had been hoped that there would have been some potential. The Council will need to complete a review on how to progress the balancing of the need to improve playing fields' quality against the loss of a playing field to housing to provide that funding and meeting the identified housing need in the district.

4.9 Gypsy & Traveller Policy

At present, a county wide assessment of Gypsy and Traveller needs is being undertaken. Initial findings from this suggest that no additional provision will be needed in Harlow. This should continue to be monitored against the other studies that are being completed, to ensure the provision continues to be sufficient within the district of Harlow. However, if the static Gypsy and Travellers have to be provided for in the housing requirement figures then there could be implications for the number of houses required.

5.0 Local Development Plan Production Process

5.1 Test of Soundness

Prior to submitting the LDF to the Inspector, the Council must be satisfied that the documentation is complete and has been undertaken using appropriate due diligence and is based upon sound evidence. The need to achieve legal compliance and for the LDP to stand up to Inspector's examination underpins the process of production of the LDP and has been taken into consideration throughout LDP process by Harlow Council. A final check should be undertaken prior to Harlow Council Cabinet approving the LDP and the subsequent submission to the Planning Inspectorate/central government.

5.2 Internal Council Processes

Following completion of the LDP and confirming the document is in final draft format, the Council must complete a number of processes and prepare supporting documentation.

The Council has commissioned consultants to undertake a Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) a legal requirement before the LDP can be approved. These assessments take a minimum of 6 weeks to complete. An Equality Impact Assessment (EqIA) and a Health Impact Assessment (HIA) are also required which can be undertaken internally and this process can take four weeks, reflected in the appended programme.

The Council will require Cabinet approval to the LDP in final draft format prior to submitting to the Planning Inspectorate after the Reg 19 consultation has been completed. In order for the technical works to be completed and their evidence be reflected in the draft LDP the SA, SEA and HRA assessments must be completed. It is unlikely that the LDP will be ready for a Cabinet meeting to agree to Reg 19 consultation before November 2017. Reports will need to be fully co-ordinated to ensure that information is consistent and the evidence base is sound. There will also be a long timeline for administration processes (e.g. referencing appendices, printing, upload to the website etc.) which must be taken into consideration, with sufficient time and resource allocated. A four week timeline has been identified as necessary to complete this and is reflected in the appended programme.

5.3 Regulation 19 Consultation Period

The Regulation 19 consultation period itself must run for a minimum of six weeks. This is the final public consultation before the LDP is submitted to the Planning Inspectorate for examination. At this stage the Council is seeking views on whether the plan is sound and meets the tests set out in the National Planning Policy Framework.

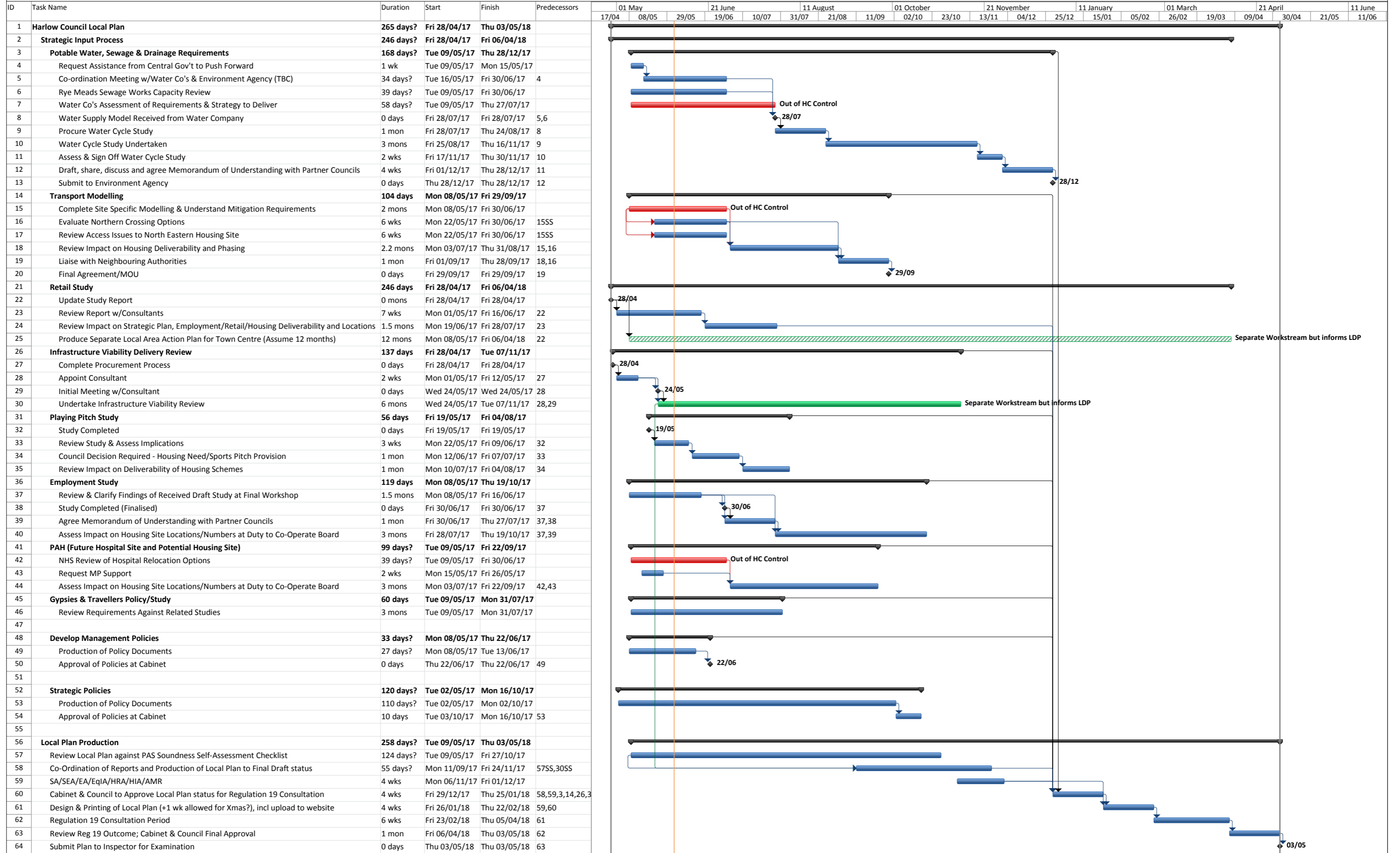
The LDP for Harlow must be based on robust and up-to-date evidence, which meets legal requirements and tests of soundness. Evidence is rigorously tested and challenged at an independent examination. Many plans have had to be withdrawn for various reasons before or after Examination, including failure to comply with national policy or statutory requirements. The Council should not submit its LDP before it is confident that it will succeed at examination.

6.0 Programme

A programme is included at Appendix 1, detailing the various activities and interdependencies necessary for defining the LDP and completing it to final draft stage, ready to go out for Regulation 19 consultation. The programme provides a visual representation of the numerous inputs to finalise the LDP. The programme shows the various activities being undertaken as bullet point milestones or in blue, with those out of Harlow Council's control shown in red. Separate work streams that are required and may affect the finalisation of the LDP are shown in green. The programme acts as a management tool for Harlow Council to track progress and identify the critical path activities.

7.0 Risk Register

A risk register is included at Appendix 2, identifying the key risks that may impact upon the production of the LDP and are being managed by Harlow Council officers. The risk register identifies the current level of risk; the likelihood and impact, with the level of risk identified as red, amber or green (RAG status) depending on severity. Mitigation measures are also identified and each risk is owned by a member/members of the Harlow Council team, to ensure risks are pro-actively reduced and/or mitigated as appropriate. The risk register is a live document which allows Harlow Council to track the management of identified risks that may have an impact, to be reviewed and updated throughout the process of finalising the LDP.



Project: 170601 HDC Local Plan.m
Date: 16th May 2017

Task		Summary		External Milestone		Inactive Summary		Manual Summary Rollup		Finish-only		Deadline		Start-only		Progress	
Split		Project Summary		Inactive Task		Manual Task		Manual Summary		Deadline		Deadline		Start-only		Progress	
Milestone		External Tasks		Inactive Milestone		Duration-only		Manual Summary		Start-only		Progress		Start-only		Progress	

Project:	Local Development Plan - Programme Management
Client:	Harlow Council
Date:	01 June 2017
Job No:	2018/0074
High Level Risk Register	

High impact / probability	
Medium impact / probability	
Low impact / probability	

OWNERS: Danny Purton (DFP), Paul MacBride (PM), Graeme Bloomer (GB), Dianne Cooper (DC)

REF.	RISK DESCRIPTION	CURRENT POSITION		COMMENTS / PROPOSED RESPONSE ACTIONS	OWNER(S)
		PROB	IMPACT		
	Risk Items				
1.00	DUTY TO CO-OPERATE / GARDEN TOWN				
1.01	Harlow Local Development Plan (LDP) completed in isolation			Duty to Co-operate Board (DTCB) has been setup; continue to liaise. Reports required for LDP commissioned jointly by neighbouring Councils to aid co-ordinated approach. DFP to continue positive relationships	DFP
1.02	Duty to Co-Operate Board (DTCB) member Councils unable to come to agreement			Strategic, joined up approach being used by all members. Memorandum of Understanding('s) (MOU) in place or being requested, relating to key strategic, cross-boundary matters. DFP to continue positive relationships	DFP
2.00	HOUSING REQUIREMENTS				
2.01	Insufficient utilities available to provide services for the locations and number of homes to be provided within the LDP period			Infrastructure Viability Review (IVR) has been commissioned, will be supported by studies commissioned as part of the IVR. Risk of insufficient gas and electricity provision. See 4.01 below	DC/PM
2.02	The number of houses that can be delivered on the strategic housing site to the east of Harlow may be reduced by the road alignments of the proposed M11 J7a			Close liaison with Essex County Council who are producing traffic modelling and continue to press the need to clarify the number of houses that can be built	DC/PM
2.03	The traffic model is implying a requirement for a secondary access, which until it is provided will affect the short term delivery of housing on the strategic housing site to the east of Harlow			Close liaison with Essex County Council who are producing traffic modelling and continue to press the implications of not delivering the model's findings to meet the timescale required for the LDP	DC/PM
2.04	The traffic model has not yet been checked for all the housing sites so it is not yet known if there may be other road infrastructure requirements for the other housing sites, as yet unidentified			Close liaison with Essex County Council who are producing traffic modelling and continue to press the implications of not delivering the model's findings to meet the timescale required for the LDP to ensure the housing sites are deliverable.	DC/PM
2.05	Essex County Council are now responsible for delivering J7a			Close liaison with Essex County Council to ensure that J7a is delivered to enable the delivery of the housing and employment requirements of the LDP. It is understood J7a will go to Planning Committee in June 2017	GB
2.06	Local Development Plan production highlights pressure of competing, multiple land uses being required for sites within the Harlow Council boundary; affects strategic vision and key decisions			Review and understand findings of the various studies informing the LDP. Close liaison with DTCB members and wider stakeholders; construct and put relevant MOUs in place. Resolve location issues e.g. where to locate the hospital and employment land, at the earliest opportunity	DC/PM
2.07	Harlow's required Affordable Housing numbers cannot be delivered within the Harlow boundary			Identification of strategic housing sites completed; wary of land pressure implications and need to identify issues at DTC Board	DC/GB
2.08	Developers come forward with schemes that do not align with strategic goals of the Local Development Plan			Meetings with developers held via DTC Officers group, discussing the requirements and expectations within the LDP they will have to meet. Garden Town agenda will also aid, by identifying strategic goals for development and setting design guidance	GB/PM
2.09	Princess Alexandra Hospital (PAH) site currently earmarked for housing cannot be delivered during the LDP period			Liaise with NHS England regarding property strategy for the hospital and healthcare delivery model	GB/PM

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REF.	RISK DESCRIPTION	CURRENT POSITION		COMMENTS / PROPOSED RESPONSE ACTIONS	OWNER(S)
2.10	Retention of current PAH site for health care use requires an alternative housing site to be identified for approximately 600 homes			Recent publicity identified PAH replacement as high priority for central government. Monitor against other influencing factors e.g. M11 J7a and transport modelling. Consider alternative site options for the 600 homes and knock-on impact	DC/PM
3.00	WATER, SEWAGE & DRAINAGE				
3.01	Environment Agency (EA) require further work to be undertaken by the water service companies as they consider there is insufficient evidence detailing the potable water & waste water infrastructure required to serve the future growth and its phasing			Thames Water to complete hydraulic modelling so that the Water Cycle Study can be commissioned by Harlow Council; enabling the Environment Agency to enter into MOU with Thames Water and Affinity Water to progress agreement of strategy and programme to support housing growth. A letter has been sent to the Environment Agency from the DTCS seeking clarification of EA requirements. DTCS to lobby central government for support	PM/GB
3.02	Additional capacity in potable water & drainage systems required to support the quantum of development during the Local Development Plan delivery period			Additional infrastructure capacity required during timescale of the Local Development Plan is identified. Responsibilities, timescale and costs for remedying to be defined and interrogated with the water authorities so that they can progress strategic planning for future demand	DC/PM
3.03	Change in standards/regulations of treatment of waste water quality during Local Development Plan period may affect infrastructure requirements at Rye Meads			Liaise with Thames Water and Environment Agency to develop a feasibility study showing the likely investment required to meet any change in standards/regulations, that can be presented to the Planning Inspectorate when the LDP is submitted	DC/PM
4.00	INFRASTRUCTURE VIABILITY REVIEW				
4.01	Infrastructure Viability Review timescale for completion impacts upon LDP finalisation			Consultant now appointed to enable commencement of IVR. Inception meeting held 25 May. LDP to be considered 'live' following finalisation in order to react to findings of IVR	DC/PM
4.02	Findings of Infrastructure Viability Review (IVR) impact upon the viability and deliverability for individual sites within the Local Development Plan			Consultant to commence work; provide them with all available studies ASAP	DC/PM
5.00	TRANSPORT CONNECTIVITY				
5.01	Finalisation/approvals of transport modelling cannot be achieved; see 2.03, 2.04, 2.05 above			Monitor ECC progress and liaise with them closely to reduce risk. Consider political lobbying to aid progression	DFP
5.02	Problems with Routing of Sustainable Transportation Corridor affects connectivity to Strategic Sites			Early identification of routing problems and alternative solutions will be important - Need for individual Strategic site master plans to incorporate connectivity	GB
5.03	Problems with identification of viable Stort Valley second crossing route may affect deliverability of development on Northern sites			Co-ordinate discussions between Strategic Stakeholders (ECC - HCC - A414 Member Group - DTCS - Gilston Developers - NHS - Landowners) to achieve satisfactory outcome	GB/DFP
6.00	RETAIL STUDY				
6.01	Risk that the Retail Study outcome, noting the need to retain current provision and expand the amount of Retail land required, impacts upon sites currently earmarked for alternate uses e.g. Housing			Review and manage results of study via the Town Centre Area Action Plan (TCAAP) which is being rolled out (subject to Cabinet approval). Identify viable sites that meet the outcome requirements of the study	DC/PM
6.02	Town Centre Area Action Plan production programme does not meet timescales for Local Development Plan finalisation			TCAAP to be a separate work stream outside of Local Development Plan. Timeline to be managed so that TCAAP can inform the Local Development Plan; manage process as 'live' following submission of LDP to Planning Inspectorate	DC/PM
7.00	EMPLOYMENT STUDY				
7.01	Harlow Council unable to meet the forecast demand for Employment Land within the District as identified within the recent study			Interrogate Employment Study and liaise with DTCS regarding alternative sites in neighbouring Districts	DC/PM

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8.00	HEALTH FACILITIES				
8.01	Care delivery provisions may be impacted upon by relocation of the hospital and programme of provision			Liaise with NHS England regarding property strategy for the hospital and healthcare delivery model. Understand interim investment to maintain care provisions	DC/PM
9.00	LIAISON WITH STAKEHOLDERS				
9.01	Ability to engage and obtain support for the Local Development Plan with third party stakeholders			Positive engagement being undertaken by Harlow District Council with third party stakeholders who are key to the LDP being taken forward and who will be key to success once instigated	GB/DFP
9.02	Unsuitable Reg 19 (LDP technical soundness) public consultation methods completed result in poor response from the public or inapplicable comments			Clarity to be provided regarding Reg 19 consultation parameters and feedback expectations (i.e. technical soundness of LDP); consider appropriate mediums through which to consult with the public and explanatory notes	GB/DC
9.03	Members of the public feel disengaged with LDP process during Reg 19 public consultation and inability to comment on proposals outside of technical soundness; risk of negative publicity			Consider further Regulation 18 public consultation as part of LDP finalisation process; note programme implications	DFP/GB
10.00	PROGRAMME				
10.01	Delays to the production of the Local Development Plan may impact upon the ability of Harlow Council to meet its strategic goals and achieve critical milestones			Agree a workable programme for delivery; track performance against the programme. Identify critical path and remove obstacles	GB/DC
11.00	TEST OF SOUNDNESS				
11.01	Risk the Local Development Plan will not pass the Test of Soundness, when submitted to the Planning Inspectorate			Constantly monitoring production of LDP against Test of Soundness Self-Assessment Checklist prior to submission when the LDP is ready. Liaison with DTCB members regarding their submissions and feedback received	DC/PM
11.02	Completion of Sustainability Appraisal (SA) & Strategic Environmental Appraisal (SEA) & Habitats Regulation Assessment (HRA) & Equality Impact Assessment (EqIA)			Prepare consultants for immediate commission of relevant work streams on completion of draft LDP	DC