

## Representations on the Submission Version 2017 of the Epping Forest District Local Plan 2011-2033

By Anthony J Jackson

Essex County Councillor, North Weald & Nazeing Division

### Site SP 5.1 Latton Priory

1. Sir Frederick Gibberd in his master plan decreed that to its south the New Town should remain below the ridge which separated it from Thornwood, Epping Upland and Epping Green and rooflines not be visible. Harlow was built to remain some way below the 85 and 90 metre contours. That remains the case today.
2. The east-west ridge which at this point runs from Junction 7 of the M11 westwards to Epping Green is a significant feature over 100 metres high and up to peaks of 110 metres. This Green Belt landscape is of open fields and woods with ancient hedgerows indicated by the location of historic remains.
3. Latton Priory is Grade 2\*, recently receiving substantial investment from, I believe, Historic England. There are 5 other Grade 2 buildings around the ridge and site.
4. There is a mapped record with Essex County Council (ECC), which I at an earlier stage ensured had been seen by Epping Forest District Council (EFDC), of the historic relics in this site and around it. In addition to the priory is the line of a Roman road unearthed to the south which indicated a run along the bridle path and hedgerows straight towards the site. Also there are 66 pages of recorded ancient artifacts along this part of the ridge.
5. Site SP5.1 sits at the ridge top and development is indicated on land from 100 to 110 metres. The Latton Priory site location plan on page 45 does not provide contours despite this important aspect. Development will be visible for miles around. An access road is indicated on page 39 running along the top of the ridge for about 1.4 miles to join the B1393.
6. The green wedge between Harlow and Thornwood will be reduced by the development with some outlying Epping Upland and Thornwood properties adjacent to it. This is a step towards coalescence. Thornwood at its southern end on the B1393 is separated from Epping by only some 600 to 700 metres.
7. The land to the south of the site lying along Rye Hill Road and down across Upland Road, including Crabbs Green, is water meadow marked on ancient maps, where in the winter water stands above the surface. Fields have land drains installed to enable cultivation. I can find no study of the impact of surface water flow from the proposed development at the top of the slope above this area.
8. There are a number of separated pieces of Epping Forest around this site and one is not marked on the map on page 50. The small Epping Forest area known locally as Crabbs Green stretches between Rye Hill Road to the south of the site to Upland Road. I cannot see that the impact on this has been considered.
9. A number of PROWs dissect the area and are not marked on the plans. I find no impact assessment.
10. References.
  - a. ECC Landscape Character Assessment 2003. Dealt with the open ridge landscape and noted it was vulnerable to further character erosion.
  - b. On page 258 of AECOM's final site assessment report to EFDC September 2016 it says in respect of the area of SP 5.1: *'the plateau at the top of the ridge should not be developed, as this would have the potential to result in significant effects on the*

*local landscape and views. New development should therefore be set down on the northern side of the ridge, such that the roof line is below the top of the plateau.'*

### **Strategic sites around Harlow**

My Division contains the proposed site SP 5.1 above but also SP 5.2 and 5.3. The total homes proposed for the three is 3900, 34% of all housing proposed in the EFDC area.

The two other strategic areas contain:

- East Herts (Gilston) 3050
- Harlow DC (east Harlow) 2600

The total of these Harlow strategic sites is 9550 of which my three sites account for 41%.

The point here is to draw attention to the small number of homes proposed for Gilston.

In my role as deputy Cabinet Member to the Leader of ECC I have been involved in housing growth and planning and am aware that Gilston was initially assessed as capable to supporting 25,000 homes. To support this I have an email from a senior ECC officer dated 19<sup>th</sup> November 2018 stating as follows; *"In respect of the historical situation, there was a proposal by the previous owners of the Gilston site (Ropemakers) for a development potentially up to 25,000 homes, however as you can imagine locally this wasn't acceptable and there was an issue about deliverability anyhow due to the overhead power cables which bisect the site, which the current development has avoided, making the area northwest into a locally owned parkland area. When the site was sold the current proposals came forward for 10,000, still locally very controversial, but of more of an acceptable scale. Even so there are only 3000 homes up to 2033, with the remainder by 2050."* The comment about the power cables does not hold water and such things can be moved away or underground as has been done elsewhere. In the completed and financed design of the new Junction 7A on the M11 to the north east of Harlow town we have future-proofed the intersection by designing in a road junction for a road from Junction 7A west to the A414 via Gilston should it be needed. However, a level of demand would be needed to justify the investment and the scale of Gilston would be crucial and likely well above 3050 homes plus retail/employment infrastructure.

Sir Frederick's master plan designed Harlow's town centre, with its shops, entertainment, parking and civic services at its northern fringe. The station is adjacent at this fringe with the bus station in the town centre. It is therefore very natural to expand north staying below the ridge which rises from Harlow's northern fringes, the railway line and the Stort River into East Herts – the Gilston site.

Gilston can take enough homes' development and supporting infrastructure to obviate the need for any development to the south or west of Harlow. Certainly it cannot be right to spread over the southern ridge as with SP 5.1 whilst under-developing Gilston.

### **Radon**

I cannot find anywhere that work has been done to check for radon seepage through the topsoil in the area around Harlow. We know that north of Harlow, in the Much Hadham area, there is a presence of radon seepage.

Anthony J Jackson

10<sup>th</sup> December 2018