

Latton Priory, Harlow

Epping Forest Local Plan – EiP Statements

Matter 4



Boyer

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APPENDICES

Appendix One – [Technical Note: Transport Response to Epping Forest Evidence Base \(Brookbanks Consulting\)](#)

MATTER 4: THE SPATIAL STRATEGY/DISTRIBUTION OF DEVELOPMENT

Issue 1: Does the distribution of development in the Plan place too much reliance upon the Garden Community Sites around Harlow at the expense of testing the capacity of the other settlements in the District?

Q1: How was the amount of housing proposed in the three Garden Town sites allocated in Policy SP5 determined (3,900 dwellings in total)?

- 1.1 In identifying Harlow as a focus for growth, the Plan seeks to respond to the well-documented opportunities and challenges that face the town, as have been recognised by the HMA authorities. These particularly concern the need to achieve regeneration and investment, and the potential to capitalise on the economic and sustainability potential of this major settlement, with its two main line railway stations and proximity to the M11¹. Clear functional relationships exist between Epping Forest and Harlow, particularly in terms of ‘travel to work’ patterns, functional economic areas and housing market influences.
- 1.2 Accordingly, as Epping Forest district doesn’t contain a settlement with similar characteristics to Harlow and yet “wraps” tightly around Harlow’s existing built form on three sides, it is logical that a significant quantum of Epping Forest’s housing need is met at or adjoining Harlow, and the principle of directing growth to the Garden Town Communities is regarded as positive, justified and consistent with the strategic framework provided by the HMA and Garden Town initiative. . However, we consider this warrants a greater provision of housing than the 3,900 dwellings currently proposed.
- 1.3 It is noted that the specific 3,900 ‘limit’ has been arrived at (largely) as a consequence of perceived highway capacity constraints (as set out in the Essex Highways ‘Highway Assessment Report’, December 2017). Acting for our clients, Brookbanks Consulting Limited (BCL) have provided a detailed Technical Note (attached at Appendix 1) which considers the Essex Highways Assessment and concludes there is no transport or accessibility constraint to a level of housing at the Harlow Garden Town Sites above the 3,900 currently proposed in the Plan.
- 1.4 In summary, this document finds that the Essex Highways Assessment under-estimates the available network capacity. This is as a consequence of the methodological assumptions applied, the limitations of the modelling, and, most notably, the failure to account for the benefit of strategic improvements to Junctions 7 and 7a.

Q2: Could a higher level have been accommodated and would this have reduced the impact of growth proposed elsewhere in the district?

¹ We refer the Inspector to pages 10 – 13 (‘Response to Spatial Development Strategy – Policy SP2’) of our response to the Regulation 19 Consultation. This provides extensive consideration of the principle of achieving major growth at Harlow.

- 1.5 The accompanying Technical Note indicates that there exists significant headroom and potential to allow further development at Harlow, in excess of the 3,900 ‘cap’. There is also potential to significantly increase the quantum of development which can be achieved through the proposed Latton Priory allocation, to 1,500. We explain how this is the case in our forthcoming response to Matter 8.
- 1.6 With respect to wider impacts, in applying an a-priori ceiling on the development capacity of Harlow, the Plan has to direct a correspondingly greater quantum of growth to the remaining settlements within the District. It is reasonable that the benefits of housing growth are distributed beyond Harlow. However, as significant development is proposed to be apportioned to lower-tier settlements, it is important to be satisfied that the development potential of Harlow will be maximised.
- 1.7 It is notable that allocations (together with associated Green Belt releases) are envisaged at a range of ‘Small Villages’, including Roydon, Nazeing, Thornwood, Fyfield, High Ongar, Lower Sheering, Sheering and Stapleford Abbots. These are in addition to ‘rural site allocations’ proposed in the east and south of the District. It may be the case that such allocations are necessary to address specific local needs. However, it is also the case that the dispersal of growth to small and/or more remote settlements is likely to result in a comparatively less sustainable pattern of development, when contrasted with an approach centred on Harlow.
- 1.8 To illustrate the point, we reiterate that maximising growth at Harlow allows for future infrastructure, public transport and service provision to be concentrated and supported by a critical-mass of households / population. This means that services can be efficiently provided. In contrast, a dispersed pattern of growth necessarily creates circumstances where service provision becomes less efficient and therefore more expensive. Such impacts are indeed inferred within the Infrastructure Development Plan.

Q3. Conversely, will the level of growth proposed elsewhere in the district be sufficient to support the vitality and viability of individual settlements over the Plan period?

- 1.9 As noted, it is logical that some growth is apportioned to sustainable locations beyond Harlow. Certainly, the level of development proposed to be directed to higher-tier locations, such as Epping and Loughton, appears broadly appropriate, taking account of these settlements’ size and character, and the availability of services. However, where growth is proposed at lower-tier settlements, which are already relatively unsustainable, there should be a very clear and well-evidenced rationale for doing so. This is particularly the case where it is argued that ‘local-level’ exceptional circumstances exist to justify the release of a particular parcel of land from the Green Belt.

- 1.10 Furthermore, it appears that a number of relatively significant allocations are proposed at certain lower-tier settlements, which are not furnished with an extensive range of services. In some specific instances, it may be that developments can unlock new services. However, it does not automatically follow that growth always materially enhances the vitality and/or viability of small settlements. As such, and notwithstanding the approach described in the ‘Report on Site Selection’ (2018), it nevertheless appears that a significant quantum of growth is being directed to less sustainable settlements, simply in order to address the overall housing requirement. If it were not for misplaced concerns regarding Harlow’s highway network capacity, it is (in our view) likely that growth might not have been proposed at some lower-tier locations.

Issue 3: Is the distribution of employment land in the Plan justified in light of the distribution of housing?

Q1: In light of the housing growth proposed around Harlow, does the Plan’s proposal to locate the majority of employment land at North Weald Bassett and Waltham Abbey risk creating unsustainable travel to work patterns? How will this be avoided?

- 1.11 Harlow is an established business location which has been successful at attracting significant levels of inward investment. It is identified for a central role in the South East Local Enterprise Partnership Strategic Economic Plan (2014) and hosts the only Enterprise Zone in Essex. In accordance with the Submission Local Plan (at paragraph 2.73), the proposed Garden Town Communities at Harlow present an opportunity to deliver additional employment benefits, commensurate with the household growth that they will facilitate.
- 1.12 The current proposals for Latton Priory (as set out in proposed Policy SP5 ‘Garden Town Communities’) envisage that the existing small-scale employment site at Dorrington Farm will be retained. We also consider that a significant number of new jobs could be secured within the allocation directly by and associated with the provision of primary and secondary schools and a mixed use local centre. This approach would be consistent with proposed Policy SP4 ‘Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town’, which states that each of the Garden Communities shall be of:

“...sufficient scale to incorporate a range of homes, employment, education and community facilities, green space and other uses to enable residents to meet the majority of their day-to-day needs.”

Furthermore, part of the land proposed for allocation at Latton Priory, together with additional land to the east, could come forward for a more substantive employment-led development. This would allow for additional economic investment opportunities to be secured at Harlow, which is recognised as being the dynamic centre within the regional economy. This opportunity will be particularly pertinent should concerns be raised in relation to those proposed employment allocations that are situated in less strategic locations.

Issue 4: Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?

Q1: “Paragraph 14 of the NPPF generally requires that a Local Plan should meet the objectively assessed development needs of the area. However, it also confirms (via footnote 9) that Green Belt is one of the constraints which indicates that development should be restricted. How has this tension been resolved in favour of the conclusion that there are exceptional circumstances to justify the alteration of Green Belt boundaries? In particular:

a. How do the specific development needs of the District weigh against the importance given to Green Belt protection?”

- 1.13 Having regard to Calverton Parish Council Judgment ([2015] EWHC 1078 (Admin)), the acuteness and intensity of the housing need is a key consideration. The ‘West Essex and East Hertfordshire Strategic Housing Market Assessment’ (July 2017), identifies the OAN for the District as 12,573 dwelling, or 572 dwellings per annum (dpa). Further, and with reference to our client’s response to Matter 3, it is our view that the level of need is in fact higher. The Submission Plan presently seeks to deliver 11,400 dwellings over the Plan-period, so housing needs are not currently proposed by EFDC to “trump” all Green Belt constraints. We note that, both the scale of identified need and the Submission Plan’s proposed requirement, are significantly higher than that defined within the District’s previously adopted Local Plan. This is the case when measured against the total quantum and via the average annual requirement. Indeed, the proposed annualised requirement (518 dpa) far exceeds the average rate of housing delivery achieved between 2011/12 and 2016/17, which equated to just 222 dpa.
- 1.14 There is also an exceptional need for affordable homes, which is both urgent and acute. In this respect, lower quartile sales prices suggest that, for the year ending June 2018, detached dwellings in the District averaged £595,000, semi-detached averaged £400,000, terraced dwellings averaged £340,000, whilst flats and maisonettes averaged £245,000. Housing affordability has worsened, with lower-quartile house prices to lower-quartile incomes ratios for 2017 reaching 13.86 (compared to 7.34 in 2002). As such, the Plan identifies a requirement for 2,851 affordable homes to be delivered between 2016 and 2033, which equates to some 178 dpa. This is a significant figure, considering that the average number of affordable housing completions between 2011/12 and 2015/16 was 45.6 dpa.
- 1.15 There is therefore a necessity to facilitate a step-change in the provision of new housing within the District if a reasonable attempt is to be made to address both current and historically unmet needs. Yet, there are inherent constraints on the availability of land. 92 percent of Epping Forest is presently designated as Green Belt. As noted below, there is also a relatively limited supply of previously developed sites. There is also no suggestion that neighbouring authorities will accommodate all or part of the identified need. It is therefore clear that Plan-wide exceptional circumstances exist, in principle, to justify the release of Green Belt land.

b. What would be the consequences of not releasing Green Belt land to help meet development needs?

- 1.16 The prevalence of Green Belt is such that the housing need will simply not be met. This will result in significant and cumulative negative socio-economic consequences, such as the suppression of household formation and worsening affordability. The failure to release Green Belt land at Harlow will also undermine opportunities for regeneration and renewal, as housing provision fails to keep up with economic aspirations.

c. Have alternatives to Green Belt release been fully considered:

i. Has full use been made of previously developed land? Has a Brownfield Land Register been published and how has it been taken into account?

- 1.17 The Council maintains a Register that identifies available brownfield sites. The Plan proposes either to allocate these sites or otherwise introduce ‘permissive’ policies (such as SP1, ‘Presumption in Favour of Sustainable Development’ and SP2, ‘Spatial Development Strategy’), which shall facilitate their development. However, the scale of recent annualised completions (in this Green Belt constrained Authority), indicates that the supply of available brownfield land will be insufficient to meet housing needs.

ii. Has the density of development been maximised, on brownfield and greenfield allocations?

- 1.18 Policy SP3 proposes to introduce density requirements which vary by location. Within towns and village centres, densities above 50 dwellings per hectare (dph) are supported. Densities between 30 and 50 dph will be supported outside of centres, whilst lower densities will only be appropriate in locations that are particularly rural or otherwise sensitive.
- 1.19 The Plan’s approach to density is generally regarded as proactive, justified and effective. However, the proposed Latton Priory Garden Town allocation is capable of accommodating development additional to that currently proposed, within the currently defined allocation area, whilst remaining in accordance with the requirements set out at proposed Policy SP3.
- 1.20 In this respect, it is estimated that the proposed allocation of just 1,050 dwellings at Latton Priory may result in net densities of approximately 25 dwellings per hectare (excluding opportunities to achieve approximately 100 units with the proposed local centre). There is then an opportunity to increase the achievable quantum of development, through densification.

iii. Could vacant homes be brought back into use? Have approximately 1000 properties in the Epping Area been empty for more than 6 months?

- 1.21 It is inevitable that a proportion of the housing stock is vacant at any point in time and (as noted) the Plan proposes permissive policies which allow for redevelopment / regeneration.

iv. Has the potential for windfall development during the Plan period been underestimated?

- 1.22 The projected level of windfall development (35 no. dwellings annually) is based on actual historic trends.

v. Could any other authority within the HMA have accommodated some of the District's housing need on non-Green Belt land?

- 1.23 The Duty to Cooperate Statement of Compliance (2017) confirms that the Council has coordinated with the HMA authorities to produce a Memorandum of Understanding (MoU). Jointly commissioned technical studies (including the Harlow Strategic Sites Assessment) identified the potential for the HMA's housing need to be addressed in a strategic manner, through coordinated growth at Harlow. This necessitates Green Belt releases at that settlement.
- 1.24 The FEMA and SHMA (2015) also confirm that the District is affected by prevailing economic and housing market relationships with Harlow and London. Exporting Epping Forest's housing need to the northern extent of the HMA would therefore fail to properly address underlying market imperatives. Such an approach would be less effective at addressing housing need and affordability issues and promoting regeneration at Harlow.

Q2. Are the changes proposed to the Green Belt boundary informed by a robust assessment of the contribution made by individual sites to the purposes of the Green Belt (EB74A-B; and EB705A-B)? How were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?

- 1.25 The approach commenced with a Green Belt Review Stage 1 (2015) assessment, which provided an initial evaluation of large land parcels, against Green Belt purposes. The Green Belt Assessment Phase 2 (2016) subsequently refined the evaluation through a consideration of relevant sub-parcels. In general terms, this methodological approach is considered to be robust.
- 1.26 However, we have concerns regarding the proposed alignment of the revised Green Belt boundary as associated with the Latton Priory allocation. We refer the Inspector to our forthcoming response to Matter 8 for details. However, in summary, it is considered that that the boundary revision does not correlate strongly with clearly recognisable physical features (as required at NPPF (2012) Paragraph 139) and should be revised accordingly.

Q5. Having regard to paragraph 85 of the NPPF, and to the potential for an increased level of housing need in the District to be identified in the future, how has the Council satisfied itself that Green Belt boundaries will not need to be altered at the end of the Plan period? Is it necessary to identify areas of safeguarded land between the urban area and the Green Belt?

- 1.27 It is presumed that this question perhaps refers to Paragraph 139 of the NPPF (2012). Notwithstanding site-specific comments (provided within our response to Matter 8), we are satisfied that the Plan identifies logical revisions to the Green Belt, which correlate with clear physical boundaries and which will not need to be altered at the end of the Plan-period.

- 1.28 However, it is apparent (particularly in view of the recent MHCLG consultation) that a significantly higher level of housing need may be identified in the near future. There is therefore a case for future-proofing the Plan (at least to the extent to which this is realistic) through the identification of land which may be safeguarded.
- 1.29 Additional land to the east of the proposed Latton Priory allocation is available for development and falls under the control of the same landowner. This land would represent a logical area for future Green Belt release, taking account of the changes to the character of the area which will occur as a consequence of the introduction of the built form already planned in the locale.

Issue 5: Is the distribution of development justified in respect of the approach to flood risk; and to protecting water quality?

Q4: Is the level of growth and the distribution of development in the Plan justified in the absence of a specific strategic assessment to demonstrate that there is sufficient capacity in the water supply network and waste water treatment network to support it without detriment to the water environment? The Environment Agency has suggested that a Water Cycle Study could have been prepared, but that other evidence, including consultation with relevant service providers, could be sufficient. What is the evidence to demonstrate that the Plan is sound in this regard? Is the Council carrying out the three actions suggested by the Environment Agency in its representations on Policy DM18?

- 1.30 Ofwat has recently instigated significant changes into the charging regimes of the potable and foul water companies. As of April 2018, they are responsible for reinforcement works covered by the Infrastructure Charge. Each individual Garden Town Site would be required to consult with the incumbent potable water and foul water company. For each of the Garden Town Sites, any upgrades to the potable and foul water infrastructure would be identified and cumulatively assessed to ensure there is capacity within the network to support the anticipated proposed growth from the Garden Town Sites, along with maintaining the existing supply for the current residents in the Harlow area, and elsewhere in the district. This is a statutory obligation.
- 1.31 For example, for the proposed development at Latton Priory in accordance with draft allocation SP5.1, consultation has been undertaken with the incumbent Potable Water (Affinity Water) and Foul Water (Thames Water) companies to understand their requirements and/or upgrades required to supply the proposed development at Latton Priory, Harlow. In the case of this site:
- Affinity Water has provided a budget estimate (their reference: DS0021775) which has confirmed a connection can be made. Affinity Water has also provided their offsite infrastructure requirements to supply the proposed development.
 - Thames Water has confirmed they are currently undertaking modelling for the proposed development. Thames Water is undertaking this modelling to ensure there will be no detriment to the existing network from the proposed development. Modelling began in November 2018 and is estimated to take 8 months.

- 1.32 We consider this consultation and associated actions to be sufficient to demonstrate the Plan is sound.

Q5: Thames Water has identified that significant infrastructure upgrades will be required to the Abbess Roding Sewage Treatment Works (STW), the Epping STW, the North Weald STW, the Stanford Rivers STW and the Thornwood STW in order to support planned growth. Furthermore, the impact of cumulative development in nearby Council areas upon the Deephams STW and the Rye Meads STW will need to be kept under review. Capacity at the Theydon Bois STW and the Willingdale STW might also need to be reviewed. What work is being undertaken in respect of these matters to ensure that the Plan's allocations are deliverable at the appropriate time?

- 1.33 Any upgrade works required to the Sewage Treatment Works referred to above would be assessed by Thames Water as part of their statutory obligation to ensure capacity for the proposed Garden Town Sites, whilst not causing detrimental impacts upon the existing network. Each development in the Harlow region would be cumulatively assessed to ascertain what works Thames Water are required to undertake. As mentioned above, Ofwat has recently instigated significant changes into the charging regimes of the foul water companies. As of April 2018, the foul water companies (Thames Water) are responsible for reinforcement works covered by the Infrastructure Charge.
- 1.34 Any necessary upgrades can therefore be achieved to ensure the Plan's allocations are deliverable at the appropriate time.
- 1.35 In the example of Latton Priory, as part of Thames Water's pre-planning enquiry (their reference: DS6054019), Thames Water has confirmed that modelling will be required to ascertain capacity issues within the network. The modelling will identify any necessary upgrades required within the system to supply proposed development, whilst maintaining network capacity for existing users. It is the statutory obligation of Thames Water to ensure no detrimental impact arises upon the existing network, therefore capacities within the appropriate network system and treatment works will be evaluated as part of the modelling work, and further improvements and upgrades required will be identified, so that there is no detriment to the network caused by proposed development.

Issue 6: Is the distribution of development justified in respect of its effect upon transport and other infrastructure in the District? Will the Plan be effective in securing the infrastructure necessary to support proposed growth?

Q1: Have the transport impacts of the Plan as a whole been tested? Has all necessary mitigation been identified and is there confidence that it can be delivered in time to support the proposed growth? Are there any remaining uncertainties or shortcomings?

- 1.36 Yes, Essex County Council (ECC) in conjunction with Jacobs have modelled the identified growth trajectory of the Local Plan which has identified the cumulative impacts. At this stage of the planning process the level of detail is sufficient to identify the necessary interventions. The planning application process will provide a further opportunity to assess the development impact and confirm the need for any further localised improvement scheme.
- 1.37 ECC in their role as the Highway Authority have supported the establishment of various traffic models in order to assess the implications of the identified growth strategy, which included the West Essex and East Hertfordshire (WEEH) traffic model and a wider Saturn model. These models have been used to identify traffic increases at sensitive locations and identify necessary highway interventions.
- 1.38 For example, Technical Note 6 (TN6), the South and West Harlow Study, assessed the implications of the Local Plan proposals through the WEEH. The objective of TN6 is to model the impact of development, specifically Latton Priory and to consider potential highway interventions.
- 1.39 Furthermore, the Highway Assessment Report (ref: EB502), which again assesses the highway impact of the growth trajectory, includes assumptions regarding the necessary highway interventions. Section 3 of the report highlights improvements to both the local and strategic road network. Together with TN6, this clearly identifies a comprehensive list of mitigation measures that are required to support the growth trajectory.

Q2. Is planned growth dependent upon a “step-change” towards sustainable travel? What does this mean and how will the Plan facilitate it? What has been done to assess the need for increased public transport and how will this be provided? How will success be monitored?

- 1.40 Yes, the delivery of the developments will be in compliance with sustainable travel policy requirements. For example, the delivery of Latton Priory will be supported by a comprehensive package of highway measures that support alternative modes of travel. The impact of the identified growth trajectory requires investment into alternative modes of travel to mitigate the development impact.
- 1.41 The Essex County Council Highway Assessment Report (ref: EB502) assesses the implications of differing assumptions in relation to sustainable travel. Scenario 2 and 3 included low sustainability with scenario 4 to 7 including medium sustainability. Report EB502 presents a robust case as trip rates that have been adopted within the assessment are very robust.

Q5. Does the Infrastructure Delivery Plan and Schedule (EB1101A & B) demonstrate that the development in the Plan can be served by adequate infrastructure at the appropriate time? Are there any significant omissions or funding gaps?

- 1.42 Yes, the IDP provides sufficient detail regarding the necessary infrastructure to support Latton Priory.

- 1.43 For example, the allocation of Latton Priory for development under Policy SP5.1 has been considered within the IDP, as confirmed in Figure 3 contained in EB1101A. In relation to the Transport evidence base, section 5.1.1 lists the main sources. Furthermore, in section 5.1.4 reference is also made towards the assessment work that utilised the WEEH, demonstrating that the wider growth trajectory has been assessed. This section also confirms the highway interventions that are needed which are reflective of the interventions included within the WEEH modelling work.
- 1.44 Report reference EB1101B provides the Infrastructure Delivery Schedule for specific developments. For example, in relation to Latton Priory, there is reference to the improvements to Southern Way, Second Avenue and minor improvements to Junction 7 of the M11.

**APPENDIX ONE – TECHNICAL NOTE:
TRANSPORT RESPONSE TO EPPING FOREST
EVIDENCE BASE (BROOKBANKS CONSULTING)**

Land at Latton Priory Farm, Harlow

Technical Note : Transport response to Epping Forest evidence base

12th January 2018

1 Introduction

Brookbanks Consulting Limited (BCL) is appointed by Commercial Estate Group (CEG) and Hallam Land Management (HLM) to consider the transportation issues in relation to the future growth identified within Harlow of as part of the emerging Local Plan for Epping Forest District Council (EFDC).

National Planning Policy Framework paragraph 32 states “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.” In support of the Latton Priory promotion, numerous studies have been carried out that demonstrate development at this location can proceed without having a severe impact and, therefore, should be supported from a transportation standpoint.

The purpose of this note is to review the evidence base that has been produced to support the development of the Epping Forest Local Plan with specific regard to the available highway capacity headroom that can be provided to deliver a garden suburb on the Latton Priory development.

2 Transport Evidence Base

In support of the Local Plan, numerous technical studies have been completed across different disciplines. The transport evidence base includes the Highway Assessment Report, dated December 2017 produced by Ringway/Jacobs. This report primarily aims to provide a review of the capacity headroom in Epping and contains additionally comments in the relation the capacity headroom in Harlow.

The Council noted at the meeting that *‘the Garden Town could not take more houses because the capacity had already been maximised and the transport assessment for this Plan period demonstrated that no more growth in the Garden Town was possible’*.

This sweeping statement is considered erroneous, there are several omissions within the Highway Assessment Report such that it cannot be used to justify the highway capacity position taken by the Council. These omissions are explored below.

The report uses the Epping Forest District VISUM traffic model to assess various forecast traffic scenarios. The model includes the key road networks within EFD with a particular focus on the Waltham Abbey, Loughton and Epping settlements. It should be noted that the outcomes of this report focus on the outputs of the principal EFD Highway Assessment Model and as such may simplify the impacts from external developments. Figure 2-2 demonstrates that the VISUM model does not include any junctions within Harlow, demonstrating that the modelling cannot be used to draw conclusions on the impact in Harlow.

The trip rates have been identified for different sustainability assumptions which assume different levels of modal split. The trip rates are generic and simplify the process, but the report does highlight that the projections are a worst case. It should also be noted that interactions / internalisation between proposed land uses has not been included. Therefore, the predicted trip generation is extremely robust and presents unrealistic growth projections and is contrary to the garden suburb philosophy.

The method used to predict the future background growth forecasts appear reasonable. However, the data has not been provided to validate the assumptions.

Trip distribution has been based on Census Journey to Work statistics which is reasonable, but the data has not been provided and therefore cannot be assessed.

This assessment did not include the strategic improvements, which includes amongst others J7 or the provision of J7a and the north/south sustainable link through Harlow that links to Latton Priory. This undermines the results as these strategic schemes has the potential to improve highway capacity significantly which could then alter trip assignment.

Table 3-1 indicates that by 2033 circa 12,000 new homes will be occupied, over and above current approvals. This assumes 750 occupations per year starting from 2018.

The report identifies a number of junctions in Epping will exceed capacity. This is not unexpected based on the robust nature of the assessment. The locations most effected should be reviewed in detail to determine what levels of mitigation are necessary, once realistic tests have been carried out that include internalisation and strategic mitigation.

The report then proceeds to discuss the potential impact on Harlow. The report highlights the location of potential allocations but does not provide clear descriptions on the development extents nor provide details on trip generation. As indicated, the report does not provide the distribution information to assess how development trips have been assigned. Latton Priory is located in a unique location, to benefit from tie strategic road network yet within closed proximity to Harlow town centre. An overly robust case may have been considered. Highway interventions have been considered, but not in a comprehensive way. There is scope to deliver a range of highway interventions that will mitigate the development impact.

The assessment of the impact relies on table 4-12, that only provides a review of speed limit changes. It is not clear if the proposals at J7a have been included. The speed limit changes are not significant and it is not possible to draw any conclusions from such a limited assessment. The delivery of highway interventions could mitigate the impact of the development. Through the assessments carried out by Brookbanks, we have demonstrated that there is scope to improve highway capacity within Harlow and, therefore, there remains clear opportunities to increase highway capacity headroom to facilitate development.

3 Summary

The transport evidence base which includes the Highway Assessment Report aims to provide a review of the capacity headroom in Epping and Harlow. It is considered that the report could be disingenuous due to several important failings, as summarised below.

The model includes the key road networks with a particular focus on the Waltham Abbey, Loughton and Epping settlements and Figure 2-2 demonstrates that the VISUM model does not include any junctions within Harlow: The lack of model coverage within Harlow undermines any of the Harlow conclusions.

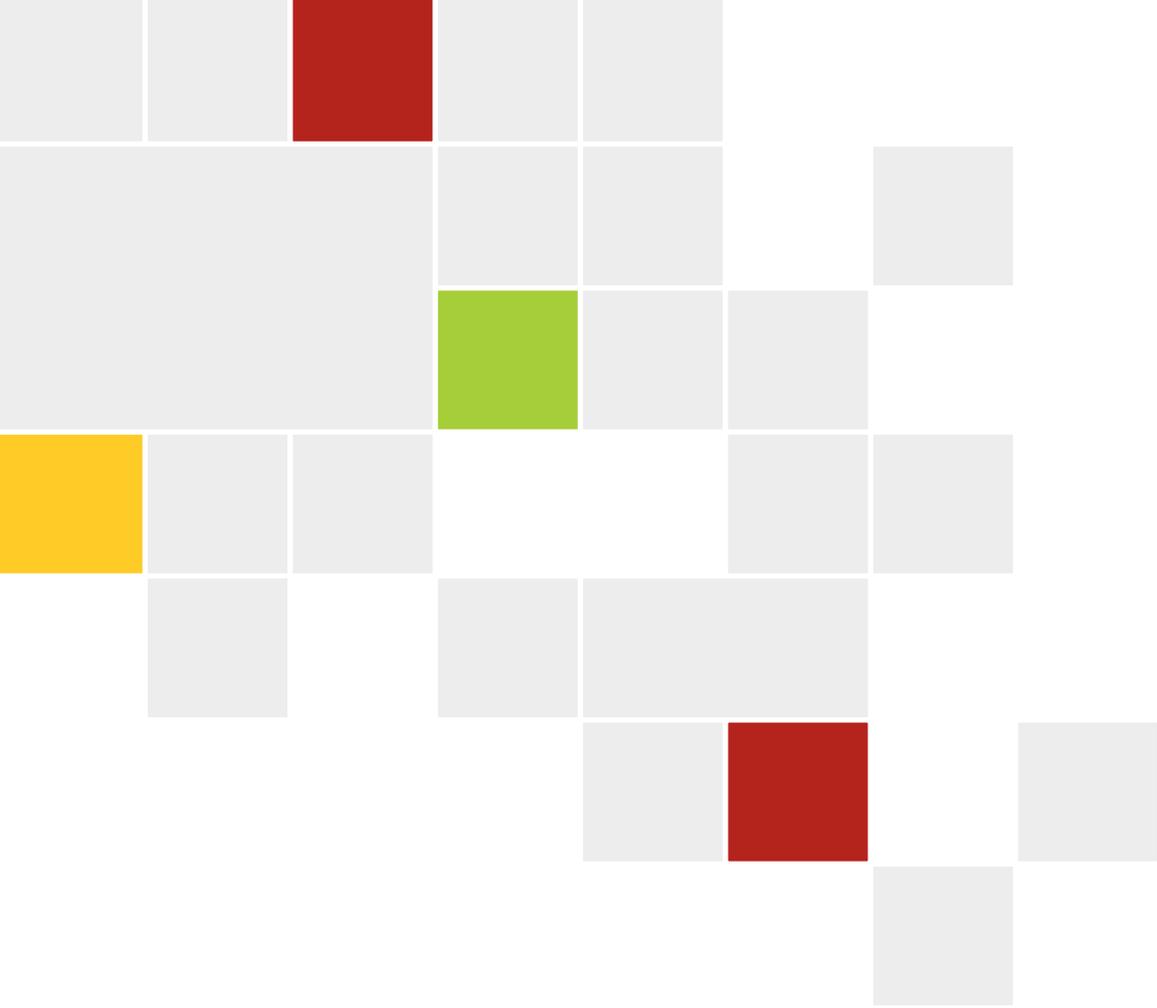
The trip rates used in the assessment are generic: The use of generic trip rates will over estimate the likely trip generation and does not take account of the specific development characteristics.

Interactions / internalisation between proposed land uses has not been included: Therefore, the projections are unrealistic / overly robust and is contrary to the garden suburb philosophy, which identifies that daily demands are addressed within the development which reduces external trip generation.

Trip distribution has been based on Census Journey to Work statistics, but the data has not been provided and, therefore, cannot be assessed: The distribution of trips intrinsically identifies the direction of travel, without assessing this data there is little opportunity to assess whether the development trips have been assigned in compliance with the development aspiration's.

This assessment did not include the strategic highway improvements, which includes amongst others J7 or the provision of J7a as identified paragraph 3.9.8: This undermines the conclusion that results ass these strategic schemes has the potential to improve highway capacity significantly.

To conclude, there are several areas of the transport evidence that present an unrealistically robust picture of capacity, and as such, cannot be used to support the development of the Local Plan.



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