Latton Priory, Harlow

Epping Forest Local Plan – EiP Statements Matter 8
### Report Control

- **Project:** Latton Priory
- **Client:** CEG and Hallam Land Management
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- **Primary Author:** Chris Roberts
- **Checked By:** Mike Newton

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<th>Date</th>
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<td>Mike Newton</td>
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<td>4</td>
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1. **MATTER 8: GARDEN TOWN COMMUNITIES**

**ISSUE 1:** What is the “Garden Town” concept as applied to proposed allocations SP5.1, SP5.2 and SP5.3 and is this significant for plan making purposes?

**Q1.** Are the four Garden Town Communities (including Gilston in East Herts) intended to function together in some way, or are the allocations essentially separate entities? Does this matter?

1.1 The Harlow and Gilston Garden Town proposal was endorsed by the Government in January 2017 with a commitment to facilitate access to public sector funding-streams, to support strategic infrastructure provision. A key dimension of the successful tender was a commitment on the part of Epping Forest, Harlow, and Essex and Hertfordshire County Councils (the collaborating Authorities) to deliver holistic growth at Harlow, in a manner which responds to key cross boundary issues and which contributes to Garden Town principles.

1.2 Harlow and Epping Forest Councils have collaborated on matters concerning infrastructure, housing, and employment, and have also coordinated to identify strategic locations for development. The Garden Town Communities are proposed in order to address identified needs, but also to deliver strategic-scale regeneration at Harlow and allow it to more fully meet its socio-economic potential.

1.3 A Harlow and Gilston Garden Town Vision (2018) sets out 15 key principles to guide the development of the respective communities. A Design Guide was also prepared which was intended to act as a framework to deliver the identified key principles in response to specific character and design considerations in the Harlow environs.

1.4 The Collaborating Authorities have also jointly commissioned studies into strategic sustainable transport and highways matters. The provision of holistic (cross-boundary) transport improvements, represents a key element of the Garden Town proposals to ensure that the planned growth is sustainable, contributes to the regeneration of Harlow and supports efficient movement, promoting integrated transport and modal shift. Accordingly, the Policy SP5 allocations will be delivered as part of a wider framework and merit an association with the Garden Town concept. However, it is important to recognise that each site will be a distinct and unique entity. This is necessary to achieve the diversity and choice that will engender a sense of pride and belonging as well as market competition between locations.

1.5 Within the Garden Town concept, it is clear that the allocations can come forward independently as long as they address shared objectives. Latton Priory is capable of relatively rapid implementation, because it is not reliant upon major strategic infrastructure enhancements for development to begin, although it will be necessary to contribute to strategic infrastructure enhancements, at the appropriate juncture.
Q2. If the communities are intended to function together, is this possible in light of their physical separation? Will the requirement for separate Strategic Masterplans be effective in achieving coherent schemes?

1.6 It is logical that the Strategic Masterplans be progressed separately. The respective Garden Town communities each concern separate sites, in different locations that give rise to differing contextual considerations and design requirements. We consider that Strategic Masterplans should be progressed separately but should be consistent with the Garden Town framework and work in progress including, for example, the work of “Thinking Place” on the identity of and vision for Harlow.

1.7 However, certain aspects of the Garden Town project require cross-boundary collaboration. For example, one aspect of the Vision, ‘Landscape and Green Infrastructure’, concerns the expansion of the existing Green Wedge network (a characteristic feature of Harlow New Town’s initial design by Sir Frederick Gibberd). This will require the Strategic Master-planning process to have regard to this town-wide design consideration. Likewise, the Key Principle ‘Sustainable Movement’ seeks town-wide sustainable transport corridors and bus rapid transit routes, which will need to be planned for in a coordinated way.

1.8 There is a need for effective cross-boundary coordination and it is noted that Policy SP4 indicates that both Epping Forest and Harlow Councils will have a role in influencing and/or agreeing the respective masterplans.

1.9 Local Planning Authorities supporting the Harlow and Gilston Garden Town project, have been collaborating extensively to address the strategic issues needed to deliver the project.

Q3. Does the Garden Town approach have specific implications for how infrastructure needs are identified and provided? Have Harlow and Epping Forest Councils worked together constructively in making decisions about where to provide health and education infrastructure, for example?

1.10 Yes, there are infrastructure requirements specific to Harlow and the proposed Garden Town Communities. The Submission Local Plan is supplemented by an Infrastructure Delivery Plan (IDP), comprising Part A and Part B reports. Additionally, a specific Harlow and Gilston Garden Town Infrastructure Delivery Plan (HGGT IDP) is being finalised that sets out details of the shared infrastructure requirements.

1.11 It is also notable that Essex County Council continues to engage with the LPAs on matters pertaining to health, highways and transport, education, employment and flood risk.

1.12 Policies SP4 and SP5 set out mechanisms which will facilitate the production of Strategic Masterplans in a coordinated manner, including procedures for cross-boundary engagement and agreement. These policies have been arrived at through consultation with Harlow Council, and the upper-tier Local Authorities.
1.13 It is evident then that Harlow and Epping Forest Councils have engaged constructively in relation to specific infrastructure requirements, and have established governance mechanisms which will allow for continued cooperation.

**ISSUE 2: Are the Garden Town allocations deliverable in respect of their impact on transport infrastructure?**

**Q1.** Are the requirements of Policy SP5 in relation to transport sufficient to mitigate the effects of the proposed development in all three communities upon existing Junction 7 of the M11 and to ensure that adequate financial contributions are made towards the provision of Junction 7a? Is it the case that the provision of Junction 7a and associated infrastructure is a prerequisite of development on these sites and, if so, is this sufficiently clear in the Plan?

1.14 In relation to M11 J7, we consider that the requirements of Policy SP5, as detailed in the IDP (EB 1101B), are sufficient to mitigate the effects of the proposed development upon this junction.

1.15 However, we note that Policy SP5 of the Local Plan Submission Version (LPSV) only refers to upgrades to M11 J7 in the context of the Latton Priory allocation, at SP5 F(xii). These improvements are not referred to in the context of the other sites allocated under Policy SP5.

1.16 The IDP schedules (EB 1101B) deal with the Strategic sites from subsection 8.4 onwards. Improvements to M11 J7 are included in these schedules but, consistent with Policy SP5, are only referred to in the section that deals with Latton Priory (sub section 8.7). This refers at LPR3 to “Minor Upgrades to Junction 7 to provide access to Latton Priory and improvements to B1393”, at a cost of £5 million. This also states: “project scoped and fully costed. If funding is not available from Road Investment Strategy 2, the cost will be borne by developers”.

1.17 However, we understand that the HGGT IDP is reviewing the question of which Garden Town sites need to contribute to the M11 J7 improvements and the apportionment of costs between them. It is our understanding that this emerging IDP work is looking again at the apportionment of the cost of these M11 J7 upgrades between the Latton Priory and Water Lane sites but, at the time of writing this statement, the work is still in progress.

1.18 Our response to this question may be affected by the HGGT IDP when it is published. We must therefore reserve our position on the Inspector’s question pending the publication of this document.

1.19 In response to the Inspector’s question about Junction 7a, this new junction is not referred to in the 2017 IDP (EB 1101B) and we understand that this is because J7a is fully programmed and costed, so no contributions will be required by the sites subject to Policy SP5.

1.20 Junction Assessments undertaken for the promoters of Latton Priory by Brookbanks Consulting Ltd (BCL) show that unlike other potential allocations across Harlow, Latton Priory can be delivered in advance of the planned Junction 7a works.
Q2. More generally, are the highway and transport improvements sought by the policy expected in the form of physical works or financial contributions? Is this clear?

1.21 Highway and transport improvements sought by the policy will be in the form of both physical works and financial contributions. These improvements will fall within the categories indicated below.

- Within site boundary - Developer
- Within Highway Corridor - Contributions
- Third Party Land - Contributions

1.22 For Latton Priory, Table 1 below indicates the proposed highway improvements and funding type.

<table>
<thead>
<tr>
<th>Improvement</th>
<th>Physical Works</th>
<th>Financial Contribution</th>
</tr>
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<tbody>
<tr>
<td>STC micro hub</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Cycle hire scheme</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Link Road</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Travel Plan Measures</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Southern Way, Second Avenue and minor improvements to Junction 7 of the M11.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>On site walking / cycling network</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Off-site walking / cycling network</td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

Table 1: Highway / Transport Improvement- Latton Priory

Q3. Essex County Council has indicated that the Latton Priory development could not deliver an essential north/south sustainable transport corridor. What difficulties does this present and can they be resolved?

1.23 It is important to recognise that the question of whether the Sustainable Transport Corridors (STCs) can be delivered applies to all of the Garden Town sites proposed for allocation through Policy SP5.1, not just the Latton Priory site.

1.24 Policy SP5 only refers to the STCs, at SP5 F(xii), in the context of Latton Priory and not in the provisions for the Water Lane Area (Section G) nor East of Harlow (Section H). This is inconsistent with the 2017 IDP (EB1101 B) which refers to the north-south and east-west STCs in Schedule 8.4 “Strategic Sites Combined” and not in the schedules for the sites individually. The policy must be corrected to ensure that all three Garden Town sites refer to the STCs. The Inspector’s question about whether the STCs can be delivered must be answered for all the proposed STC corridors.
1.25 According to the draft Harlow and Gilston Garden Town Sustainable Transport Corridors Strategy, the delivery of a STC at Latton Priory will require third party land. However, it is important to note that this is also the position for the STC links to the other Garden Town Sites.

1.26 Within the Harlow Strategic Site Selection Report, analysis from Essex County Council has identified the potential for a sustainable transport corridor between Gilston and Latton Priory and a complementary east-west sustainable corridor. The Latton Priory promoters very much recognise the site’s potential to help deliver a north-south sustainable transport corridor and will work with the District and County Councils through the Development Forum process to help realise this proposal.

1.27 The deliverability of the STCs, including a north / south STC at Latton Priory, is currently being assessed by the Council. However, there are still matters to define at this point in time regarding specification, cost, funding, timing and route alignment. Consultants SYSTRA, Jacobs and Arup are all working on elements of the STC study, including cost, land assembly requirements, the level of modal shift the STC will enable, design of hubs and route alignment.

1.28 The cost of the STCs has been assessed at £150 million and there are expectations of funding from the Housing Investment Fund and Homes England to address any funding gap.

1.29 As indicated above, there are certain matters still to be fully resolved including route alignment, land assembly and detailed specification of the STCs and associated hubs. The current cost estimate of £150 million is provisional and some consideration of viability will be necessary at the application stage when the work by the Council and its consultants (as set out in paragraph 1.27 above) has been completed.

1.30 Whilst the Promoters fully support the development of a STC, this is not essential for the development at Latton Priory which can be supported by other north-south connections to Harlow and comprehensive sustainable transport measures. These include:

- On-site provision of walking and cycling routes that will connect the housing areas with local facilities proposed within the development, as part of a comprehensive network
- Off-site improvements to walking and cycling facilities with connections to the existing network including a high quality link to Harlow town centre and station (incorporating a network of Public Rights of Way that pass through a corridor of green open space linking through to the town centre). This will cater for employment, retail, education and leisure based trips
- Providing public transport access to initial development phases by extending the existing bus routes to penetrate the site such that any future dwellings are a minimum of 400m from a bus stop.
- At a development threshold (to be defined) the development could support the provision of a new dedicated bus service into and through the site (bus operator Tellings-Golden Miller has been consulted on this strategy and has confirmed support for the proposals).
A possible bus route indicated above.

1.31 Following the above, it is considered that the site is suitable for a mixed-use development and can be supported by comprehensive sustainable measures besides the STC.

ISSUE 3: Are the criteria in Policy SP4 justified, effective and consistent with national policy?

Q1. Will the criteria within Policy SP4(C) ensure that sufficient regard is had to the historic environment, including built heritage; townscape; archaeology; and designed landscapes, in planning generally for the Garden Town Communities? (Reps HE)

1.32 We consider that Policy SP4 should make more specific reference to the historic environment and the particular aspects of the historic environment referred to by the Inspector in setting criteria and requirements for the Garden Town communities.
ISSUE 4: Are the site allocations (SP5.1, SP5.2 & SP5.3) in Policy SP5 sound and deliverable?

Q1. Should Policy SP5 and the relevant supporting text exclude reference to the size of schools to be provided for flexibility? Should a land area be specified instead? Should the policy make it clear that financial contributions could be sought towards school provision?

1.33 Such an amendment would allow for additional flexibility, whilst also ensuring that sufficient land is retained (within Strategic Masterplans and subsequent design documents) to allow for education provision to be made. It is recognised that the configuration of education provision (e.g. in terms of entry forms, etc.), cannot be fully specified until the Strategic Masterplans are advanced and/or until development management stage. At this stage the precise requirements of the education authority have not been specified and there is a need for flexibility to make adjustments subject to areas of land being safeguarded for this provision.

Q2. Will sufficient employment land be available in/near to the new Garden Town Communities to “enable residents to meet the majority of their day to day needs” within them and to “maximise the use of sustainable transport modes” as required by Policy SP4? Has consideration been given to providing more employment land (and less housing if necessary to achieve this) within the relevant allocations? (Reps Harlow and ECC).

1.34 Yes, we consider that the Garden Town Communities present an opportunity to provide significant new employment from a variety of sources and that it is not necessary to provide additional segregated employment land to enable residents to meet the majority of their day to day needs or maximise the use of sustainable transport modes.

1.35 Proposed Policy SP4 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.”

1.36 However, at Latton Priory, we do not consider it necessary to allocate a specific segregated area for B class uses within the development area currently proposed for allocation. Policy SP5.1 F(ii) proposes one hectare of employment land at Dorrington Farm which we understand is additional to the existing employment uses on this site (although this is not clear from the wording of the Policy). This proposed allocation is not at the optimum location in relation to the strategic road network and there is no express justification for the provision of this quantity of land in this particular location.

1.37 We consider that a significant number of new jobs could be secured within the allocation in association with the provision of primary and secondary schools and a mixed use local centre. We would add that there is no reason why the centre could not include Class B1a elements without a segregated area being identified for this purpose.
1.38 It is further noted that the introduction of sustainable transport corridors will also ensure that future residents are able to commute (via public transport) to the major employment opportunities available in the centre of Harlow. This will contribute towards regeneration objectives for the existing Harlow urban area.

1.39 We have put forward detailed proposals for a strategic employment area of some 12-15 hectares to the east of the area currently proposed for residential development which would have immediate access to M11 J7 and the wider strategic road network. This is the only viable and accessible location where a significant area of land could be dedicated to B class uses associated with the Latton Priory site. This should be considered for allocation as part of the current Plan or an area of land could be safeguarded from the Green Belt to fulfil this purpose at a later date.

Q3. What effect would the development of sites SP5.1, SP5.2 and SP5.3 have upon the purposes of the Green Belt? What would be the impact of Site SP5.2 (Water Lane Area) on the identity of Broadly Common and Old House Lane in Roydon Parish?

1.40 We have given detailed consideration to the effect of development at Latton Priory on Green Belt purposes and this is summarised in the table provided at Appendix 1 to this statement and considered in more detail in our representations to the LPSV. It is clear from this analysis that the land proposed for release at Latton Priory makes only a limited contribution to the five Green Belt purposes defined in NPPF 2012 para 80 (although we consider there would be a positive impact on the purpose “to assist in urban regeneration”).

1.41 However, our representations in response to the LPSV raise concern as to the soundness of the revised alignment of the Green Belt boundary and the fact that this falls well within the defined site allocation and masterplan areas as shown in Maps 2.1 and 2.2 (see paragraphs 5.61 to 5.78). We do not repeat these concerns in detail within this statement but the key issues are summarised as follows:

- The new Green Belt boundary at Latton Priory is not defined in accordance with NPPF (2012) para 85 which requires that authorities “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”
- The Green Belt boundary shown on Maps 2.1 and 2.2 of the LPSV follows no recognisable physical features such as hedgerows, field patterns or historic structures on the ground
- The fact that the new Green Belt boundary at Latton Priory cuts across and falls well within the allocation and masterplanning areas is not clearly explained nor justified – we consider the Green Belt boundary and allocation areas should coincide
- If the new Green Belt boundary coincided with the allocation and masterplan area, it would comply with the requirements of NPPF (2012) para 85.
1.42 For the purposes of our joint master-planning work with the Council, the promoters have interpreted the Green Belt boundary shown on Map 2.2 as a possible limit to the development area rather than a Green Belt boundary as such (although any built development limit should be given further consideration through the Strategic Master-planning process).

**Q4. Do the maps of the Masterplan Areas require amendment to clarify that the “residential site allocations” are also expected to include land for schools and other services and infrastructure? (Reps ECC).**

1.43 We consider this to be unnecessary. The proposed Strategic Masterplans will be more refined than the Masterplan Areas presented in the Plan and will therefore provide a more considered analysis of where particular uses should be located, taking account of opportunities and constraints.

**Viability**

1.44 In our letter to the Inspector dated 11 January 2019, we indicated our wish to ensure viability is appropriately addressed through the Examination of the Plan in relation to the nature and extent of infrastructure requirements for the Garden Town Community sites. In setting out this view, we were mindful of the new provisions in the NPPF 2018 (and PPG) which essentially define viability as a matter to be considered at the Plan making stage, with the onus on the applicant to justify addressing viability in the context of a subsequent planning application.

1.45 In a letter to Boyer Planning dated 20 January 2019, the Programme Officer states that Matter 8 issue 4 provides an opportunity to consider the deliverability of the garden town allocations and the Inspector would accept a Statement concerning viability here.

1.46 With regard to the Latton Priory allocation, this is an unconstrained green field site where we expect strong residential values and where, fundamentally, there should be no issue, in principle, with viability.

1.47 The promoters of Latton Priory are in constructive engagement with the Council and their consultants with regard to the work in progress on the Garden Town IDP and viability assessment and we expect this work to come to a satisfactory conclusion. However, it is inevitable that viability will have to be considered to some degree through the planning application stage and the promoters of Latton Priory must reserve their final position until such time as viability can be fully assessed and determined.

1.48 We consider it important that this fact is specifically acknowledged by the Inspector through the examination to ensure that the need for more detailed consideration of viability at the application stage is safeguarded against the new provisions of NPPF 2018.
1.49 If however, the Council is able to complete its IDP and viability work in sufficient detail for the matter of viability to be examined at this EiP, representors must be allowed sufficient time to consider and make statements on the output from this work and for this to be properly examined through an additional hearing arranged for this purpose.

Q5. Will Policy SP5(F) effectively preserve or enhance the setting of designated and non-designated heritage assets to the south of the site, including Latton Farmhouse; Latton Priory; two scheduled monuments; and two moated sites? (Reps HE).

1.50 The Promoters and EFDC officers have been working for many months on the strategic masterplan for Latton Priory that is a requirement of Policy SP5.1. The current stage of development of this Masterplan is included as Appendix 2 and demonstrates the progress that has been made (although this form of the masterplan is still under consideration).

1.51 There are two scheduled monuments; a moated site to the south of Dorrington Farm, and Latton Priory, rather than four separate heritage assets as this question might imply. We consider it would be helpful if Policy SP5 F(vi) would make more specific reference to these heritage assets and the need for the Strategic Masterplans and detailed development proposals, to protect their settings. This will reflect the fact that these assets have already been given detailed consideration through the current Strategic Master-planning process.

1.52 Historic England’s (HE) comments concerning Latton Priory relate (primarily) to the potential presence of non-designated heritage assets and the requirement to conserve or enhance the scheduled monument, and its setting. HE’s representation also seeks to flag the presence of the listed buildings and note that the need to have regard to their setting is not mentioned within the wording of the policy. HE’s comments also recommend that an assessment of undiscovered archaeology within the site is undertaken. These comments are considered to be both fair and reasonable, taking account of the site’s proximity to nationally important monuments.

1.53 The promoters of Latton Priory have instructed appropriately qualified experts and undertaken a thorough heritage assessment of the site. This considers the potential for non-designated archaeological remains, as well as the significance and setting of nearby designated heritage assets. A desk-based assessment was originally undertaken over 10 years ago, at which time initial consultation was undertaken with Historic England (formerly English Heritage).

1.54 Following consultation with Place Services (archaeological advisor to the LPA), in 2018, the desk-based assessment was updated and substantially revised. The full extent of the proposed allocation site (and a substantial area beyond it) was subject to a geophysical survey. This survey identified a small number of features of potential archaeological interest, all of which are considered to be of local significance. This has been submitted to Place Services and discussions have been held with them regarding the need and scope of archaeological trenching in support of an eventual planning application.
The presence of the designated heritage assets has been a key design consideration through the emerging masterplan and this responds positively to these assets and their settings, to ensure that potential impacts are avoided or reduced. The retention of open space will ensure that the setting of the moated site to the south of Dorrington Farm will be enhanced. The provision of an extensive SANG area in-between the nearest edge of the built form and Latton Priory, together with the topography associated with the area proposed for development, will both preserve and enhance the setting of the north western side of Latton Priory. The remaining setting of Latton Priory will be unaffected by the allocated site. This is clear from the current draft Masterplan, which is attached hereto.

Q6. Does the Masterplan Area shown on Map 2.2 provide sufficient points of access to achieve a sustainable connection route to the B1393 Epping Road? (Reps ECC).

No, map 2.2 does not propose or indicate any points of access to the site. The principal issue is the need to provide an east-west link road between Rye Hill Road and the B1393 London Road (the Link Road). An “indicative access road for Latton Priory” is shown on Map 2.1 of the LPSV and we consider that this should also be shown on Map 2.2.

It is necessary for Map 2.2 to show the link road and we consider that Policy SP5.1(F) should make specific reference to it as essential site infrastructure. The link road will then be delivered as an integral part of the site layout. This not only secures the delivery of the link road but also the transport benefits that result.

A new Link Road site has been proposed for some time by the promoters as an integral part of the development to provide the primary route through the Latton Priory site. This has the potential to reduce traffic on sensitive local roads around the site. The specification of the Link Road has been discussed and agreed with ECC.

In early 2018, Jacobs were commissioned by ECC to utilise the Harlow VISUM strategic traffic model to assess the implications of the West Essex and Hertfordshire Local Plans. Jacobs subsequently produced a Technical Note 6 (TN6), being a study of the South and West Harlow development sites, including the 1,050 unit development at Latton Priory.

TN6 identifies that there are a number of potential access arrangements that could be implemented to connect the Latton Priory site with the local highway network. These include:

Option A – Access via Rye Hill Road to the west of the site;

Option B – Access via B1393 London Road to the east of the site; and

Option C – Access to both west and east, including a link road through the site. It should be noted that the link road was modelled to minimise its attractiveness to through-traffic;

A comparison of Option A and Option B indicates that the Option B (eastern access) is likely to result in Latton Priory traffic using more strategic routes to reach the town centre, whereas with the Option A (western access), traffic would tend to percolate through the local road network, using Rye Hill Road and the local highway network south of the town.
1.62 Overall, allowing access in both directions via a link road (Option C) would be likely to distribute Latton Priory traffic more evenly and more appropriately across the local and strategic road network. With regard to likely impact on Southern Way, Option C would be likely to have the least impact, and Option A (western access) would be likely to have the most impact on this corridor and on the south west of Harlow.

1.63 During the promotion of Latton Priory, the Promoters assessed the impact of 1500 units (which is the capacity determined by the Promoters through the masterplanning process) and this specifically included connections to the road network to the east and west and the link road through the site.

1.64 The production of TN6 demonstrates that ECC understand the merit of the link road which is fully deliverable and on land controlled by the Promoters. It is recommended that map 2.2 is extended to reflect access towards B1393 in order to support the link road, which delivers appropriate access points that support trip dispersion.

1.65 We suggest an additional sub paragraph to Policy SP5 F to extend the current list of requirements under Roman numerals (i) to (xiv) to state:

"An east-west road shall be provided to link Rye Hill Road in the west to London Road in the east to ensure unrestricted access to the site with the means to accommodate sustainable modes of travel as well as private motor vehicles, as depicted in Maps 2.1 and 2.2."

1.66 Appendix 3 depicts a recommended alignment for this link road to be considered and there is scope for the detail of the route and specification of the road to be determined through the Strategic Masterplan process.

1.67 The alignment of the proposed east-west link road from London Road to Rye Hill Road, as shown in Appendix 3, takes account of site constraints as well as design proposals including the need to respect and where possible enhance heritage assets within the site, to mitigate visual impact from outside of the site as well to respect heritage and ecological assets within the site.

1.68 Access from London Road has been located further south than the existing access point to Latton Priory Farm, away from the Grade II listed Rundells, The road enters the ownership boundary from the east, at the lowest point on this section of London Road, and climbs north-west up the landform before turning west towards the allocation edge. The geometry is designed to be setback from the Grade II* listed Latton Priory and allows for sufficient space for the proposed SANG which would offer screening between the two elements. The road enters the allocation site at the intersection of the site boundary and “build-to” line for development (the Council’s proposed Green Belt boundary) dissecting the existing tree belt at its narrowest point.
APPENDIX ONE – ASSESSMENT OF LATTON PRIORY SITE AGAINST GREEN BELT PURPOSES
<table>
<thead>
<tr>
<th>Green Belt purpose</th>
<th>Assessment of Latton Priory Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Check the unrestricted sprawl of large built-up areas</td>
<td>Landform and significant blocks of woodland provide natural containment and strong defensible boundaries to sprawl, subject to capacity limits</td>
</tr>
<tr>
<td>2. Prevent neighbouring towns from merging</td>
<td>No settlement coalescence issues</td>
</tr>
<tr>
<td>3. Assist in safeguarding the countryside from encroachment</td>
<td>Limited areas of land contained within landform adjacent to the settlement edge. Areas close to settlement edge are fragmented and separated from open countryside by landform and woodland blocks</td>
</tr>
<tr>
<td>4. Preserve the setting and special character of historic towns</td>
<td>Areas of land orientated towards Harlow form part of the Harlow context presenting a wooded skyline setting in views from elevated properties at the town centre. The containment function of the wooded skyline is to be preserved.</td>
</tr>
<tr>
<td>5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land</td>
<td>The southern estates adjoining the Latton Priory site have been identified for regeneration (we acknowledge that regeneration is a benefit of the development proposals rather than a Green Belt purpose of the existing land but it is nevertheless an important consideration)</td>
</tr>
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APPENDIX TWO – MASTERPLAN FRAMEWORK
SKETCH LAYOUT
APPENDIX THREE – PREFERRED ALIGNMENT
EAST-WEST LINK ROAD
 Contractors are not to scale dimensions from this drawing.