

**Harlow District Council Statement
February 2019**

**Epping Forest District Council : Examination of the District Local Plan, 2011 –
2033**

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 planmaking purposes?

1. 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?

It is Harlow Councils position that the Garden Town Communities, based on the four strategic site being promoted by developers in and around Harlow, are a reflection of the joint spatial approach taken by East Hertfordshire, Epping Forest and Harlow District Councils, together with Essex and Hertfordshire Council’s. This was developed in order to accommodate the housing need identified across the wider Harlow area, as set out in the joint SHMA¹. The joint working has been undertaken under the auspices of the Cooperation for Sustainable Development Board² that was established in order to support local plan making and to secure the delivery of sustainable communities across the geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. Other joint studies were undertaken to inform the appropriate spatial distribution of the identified housing need³ and which resulted in the signing of a joint MoU in this respect⁴. This culminated in the development and endorsement of a shared approach by the three districts and two county councils to help shape the development being brought forward across the area, as set out in the Harlow and Gilston Garden Town Vision (HGGTV).⁵

This collaborative approach is also reflected in the preparation of overarching strategic policies contained within the respective local plans being prepared by the three districts in order to provide a consistent framework with which to coordinate development. Whilst the strategic housing sites, within and adjoining Harlow, are being promoted by separate developer interests, this strategic policy framework will ensure that the key elements of the Harlow and Gilston Garden Town Vision are taken into consideration in the assessment of planning applications submitted within the respective local planning

¹ http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/HOP.012_Impact_of_Formation_Rates_on_OAN-Based_on_ONS_proposed_changes_to_household_projections.pdf

² <https://www.harlow.gov.uk/csdb>

³ <http://www.harlow.gov.uk/sites/harlow-cms/files/files/Harlow%20Spatial%20Options%20Study.pdf>

⁴ http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/Final%20OAHN%20MoU%20following%20Board%20on%2020%20March%20017_Redacted.pdf

⁵ <https://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/Harlow%20and%20Gilston%20Garden%20Town%20Vision.pdf>

authority areas. This will ensure that the four Garden Town Communities function in a spatially cohesive manner across the wider Harlow area.

2. 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?

It is contended that whilst the four Garden Town Communities are located within and adjoining Harlow the developments will be brought forward in the context of the shared approach set out in the Harlow and Gilston Garden Town Vision. As stated previously this document sets out the vision for the Garden Town and the principles which will inform its growth and management. It will, therefore, help support the delivery of the locally-led Garden Town, furthering the joint-work that is supported by Government.

The vision and principles for the Garden Town have been informed by the Town and Country Planning Association's (TCPA) Garden City Principles⁶ and from input from our stakeholders and the local community. In addition the developments that comprise the new Garden Communities will be linked to the higher order facilities available in Harlow, including retailing, health and leisure, as well as employment opportunities, and to each other, through the Sustainable Transport Corridors that pass through the existing Green Wedge network.

Consequently whilst the sites are physically separate, their development and delivery will need to have regard to the overarching principles set out in the HGGTV. In addition individual masterplans are being prepared, in collaboration with the relevant local planning authorities, which will inform the preparation of subsequent planning applications. More specifically these will also need to have regard to the more detailed and site specific policies set out in the respective Local Plans of East Hertfordshire, Epping Forest and Harlow District Councils.

3. 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?

Epping Forest and Harlow District Councils have worked together on the preparation of a joint Garden Town Infrastructure Delivery Plan (GTIDP), in conjunction with a range of other key infrastructure providers including the utility companies and health care providers. In addition a Statement of Common Ground (SoCG) is being prepared in respect of the strategic site to the East of Harlow that will identify the infrastructure that is needed to be brought forward to support the development. Further the identified infrastructure will also be taken into consideration in the development of the masterplans that are being prepared to help shape and guide the implementation of the housing being brought forward on the four strategic sites. Working collaboratively with Epping Forest Council, and where appropriate Essex County Council, the preparation of the masterplans will provide a framework within which the location of key infrastructure can be identified, agreed and delivered.

⁶ <https://www.tcpa.org.uk/garden-city-principles>

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

3. 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?

It is the position of Harlow Council that the provision of the north/south Sustainable Transport Corridor is essential in order to secure the objectives set out in the emerging joint Harlow and Gilston Garden Town Transport Strategy. This will ensure the desire to secure significant modal shift can be achieved in order to mitigate the existing highway capacity issues across the road network in south Harlow, utilising sustainable transport measures involving enhanced bus, cycle and footpath links. The Council would wish to ensure that the development proposed at Latton Priory can garner sufficient funding to deliver the necessary infrastructure and has been continuing to work with both Epping Forest District and Essex County Council's to consider how this can be achieved in accordance with wider objectives of the Harlow and Gilston Garden Town Vision. In this respect a position statement is being prepared between the parties to demonstrate current progress.

Issue 4: Are the site allocations (SP5.1, SP5.2 & SP5.3) in Policy SP5 sound and deliverable?

All sites

2. 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).

It is Harlow Council's position that the joint FEMA study⁷ identified the employment floorspace needs for the individual districts. Harlow is meeting its requirements through the allocation of employment sites in the Harlow Local Development Plan (HLDP). The outstanding assessment across the Garden Town is to be addressed through more nuanced work that is to be undertaken by the partner authorities. However, whilst Policy SP4 and HGT1 refers to small scale employment provision on the strategic development sites within the GT Communities, the scale of what is being proposed at Latton Priory, in respect of employment floorspace at Dorrington Farm, needs to be tested to consider viability and deliverability as well the impact on the highway network arising from additional traffic generation across the neighbourhoods in south Harlow.

Technical Notes commissioned by ECC highlight the capacity issues on the road network in the neighbourhoods in southern Harlow⁸. It is understood, therefore, that small scale embodies small start-up units and office units above shops providing day to day services. Larger scale employment is only generally appropriate on well-connected large sites and the additional work being undertaken will help to refine this and to consider how access can be achieved in a sustainable manner.

⁷ <http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/West%20Essex%20And%20East%20Herts%20Assessment%20of%20Employment%20Needs.pdf>

Furthermore Epping's employment strategy which identifies employment land at North Weald needs to be considered in relation to access to good and sustainable public transport links. The opportunity to consider the provision of employment land at sustainable locations close to J7 and the new J7a, would help reinforce the attractiveness of the HGGT, especially given the locational advantages of being adjacent to the M11 corridor. It is understood that sites have been promoted, that could have the potential of providing commercially attractive employment locations that would accord with the economic and regeneration principles set out in the joint HGGT Vision. It is understood that sites seem to have been discounted due to mostly landscape impacts, however, Harlow Council considers that suitable mitigations measures could be put in place to ensure there is limited harm given the overall economic and regeneration benefits these sites could bring.

It is crucial that further technical work is carried out in order to understand the employment requirement for the wider Garden Town area. Until this work is complete there is a risk that the proposed employment strategy for Epping will impact upon the sustainability of Harlow and Gilston Garden Town and could impact upon the existing transport network in Harlow.

Site SP5.3: East of Harlow

9. Map 2.1 shows that the Masterplan Area for this allocation crosses the boundary with Harlow. Have the Councils worked together to ensure complementary proposals for this area?

It is Harlow Councils position that it has been working collaboratively, not only with Epping Forest District Council (EFDC) but with Essex County Council (ECC), in accordance with the Duty to Cooperate, in order to ensure that development of the large strategic site East of Harlow is coordinated and that the proposals are complementary. This has been achieved through discussions at the Cooperation for Sustainable Development Board and the development of masterplanning principles, together with joint engagement with developers, through ongoing meetings and their subsequent participation in Developer Forums, facilitated by EFDC.

The intention has been, therefore, to align policies where this is feasible in order to secure a coordinated and consistent approach in the consideration of development proposals at the planning application stage, subject to the corporate priorities of the respective local planning authorities.

The proposed allocation of the land as a strategic housing site has been informed by technical evidence that has been assembled by the respective councils in order to inform policies and proposals in their local plans. Some of these have been joint studies including the Water Cycle Study, the IDP and a range of Technical Notes prepared by ECC.

10. Are the requirements in Policy SP5(H) intended to apply to the whole Masterplan Area or only to the part within Epping Forest? Should this be clarified? In particular, is the "local centre" required by Part H(v) needed to support the whole area or just that in Epping Forest?

It is Harlow Councils position that the requirements set out in Policy SP5(H) reflect an EFDC focus, however, they have been prepared to complement the equivalent policy in the Harlow Local Development Plan (HDLP), Policy HS3, that has been submitted for Examination. Both policies reflect the more detailed spatial expression set out the overarching strategic policies of Policy SP4, contained in the EFLP, and Policy HGT1 in the

HLDP, that relate to the Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town. These were prepared to acknowledge that the site is in reality one large strategic site that straddles the administrative boundaries of two different local planning authorities.

11. I understand that no firm decisions have been made about the preferred location for the new hospital campus or secondary school referred to in Part H(vi) and (viii) respectively. On this basis, is it justified to include these requirements in the Policy? What will happen to the land safeguarded for these purposes if ultimately it is not needed? Should this be clarified?

It is Harlow Councils position that the desire for the Princess Alexandra Hospital to relocate to a location within the wider Harlow, in order to improve the quality of healthcare, through the provision of a new health campus, is generally supported, subject to site specific considerations relating to highway capacity on the road network. In addition to providing enhanced facilities in order to meet future health needs, including that arising from additional housing growth, a new hospital facility would help reinforce the vision for the area, as set out in the Harlow and Gilston Garden Town Vision.

The Council also acknowledges the need for the provision of a new secondary school to serve the growth arising from the strategic site to the East of Harlow. It is considered appropriate to acknowledge, however, within the policy of the need to accommodate a new school in order to provide some certainty. The final location could subsequently be resolved through the preparation of masterplans that would inform the preparation of detailed planning applications.