

Matter 14: Infrastructure and Delivery

The Plan and its Infrastructure Development Plan (IDP) linked into Plan policy:

1. Fail to mention or require necessary sustainable transport (ST) infrastructure;
2. Don't include ST projects that are assumed to be put in place to help make the Latton Priory land allocation sustainable, including those mentioned in EB1408 and EB1406, but not included in Plan policy;
3. Fail to identify the total costs of infrastructure that will be required and how it will be funded; in the same way as the IDP doesn't even show how the projects that it does identify will be funded and achieved.

Delivery also is dependent on supplementary documents (like Vision and Design Guides) and CIL.

Documents were expected to be made available by 15/4/19, for consideration in this Hearing Statement, but haven't been 'delivered'!

1.)-Both the Plan and IDP don't mention or require major High Quality Public Transport (HQPT) that should be required to make travel in the District (apart from Harlow & Gilston Garden Town) more sustainable, as set out in my Transport Hearing Statement: both in conceptual terms regarding HQPT; and the example given using the route of the Epping-Ongar Line.

2.)-Documents relating to the Latton Priory allocation show public transport links between the allocation and Epping, not included in the Plan or IDP.

The Draft Transport Strategy (EB1408) shows both:

- a "Sustainable Transport Corridor potential extension (incl. walking and cycling)" south from the Latton Priory allocation towards Epping via the B1393; and
- "New/improved pedestrian and cycle link" also south to Rye Hill Road.

The Vision (Harlow & Gilston Garden Town Vision (November 2018)) (EB1406) shows on pages 5 the same "Sustainable Transport Corridor potential extension" and "New/improved pedestrian and cycle link". Whereas page 21 shows a "Cycle Super Greenway" to Epping Underground Station, and a "STC- Possible future extension" (STC comprising Bus Rapid Transit).

However the deliverability of these is questionable due to funding (about which the IDP doesn't give any certainty) and, in any event, practicality.

The length of the route, certainly for pedestrians and for all but keen cyclists, between Latton Priory and Epping Underground is unrealistic for all but the most occasional use: not making an appreciable impact on transport patterns and car dependency.

Use of pedestrian and cycle routes from Latton Priory to Epping Underground Station would entail:

- Use of the long and winding Rye Hill Road, an unlit narrow country road with no footways subject to speeding traffic; which slows only to be able to pass vehicles coming in the other direction (a suggestion to close the road to vehicles seems impractical given the number of rural properties served);
- Use of part of the B1393. Traffic speeds, and volumes for the modest width of the road would deter all but the most adventurous cyclists, and you don't see cyclists using this road (roads through Epping Forest SAC are by contrast at least used by some lycra-clad cyclists for recreation).

Pedestrians face very poor footway provision. Footways are typically about half-a-metre wide, on one side of the road only; and not always the same side of the road, requiring crossing back and forth along the length into Epping. Again, you don't see pedestrians using this road, even for recreation. To widen such poor quality footpaths that exist would mean existing lamp columns in the middle of the footway, unless the expense of moving these was incurred.

Thus the route for pedestrians and cyclists in both documents EB1408 and EB1406 is utterly impractical as a means of shifting transport habits to these sustainable modes.

3.)- The IDP fails to identify the total costs of infrastructure that will be required to achieve sustainable development of the scale envisaged in the Plan and how it will be funded.

In the same way, the IDP doesn't even show how the projects that it does identify will be funded and achieved.

Funding gaps, and un-rebutted concerns from developers about the viability of sites, means less infrastructure than necessary will be delivered. It is abundantly clear that developer contributions will be essential.

For the IDP to start being convincing, the infrastructure funding gaps need to be totalled-up; with totals then given for expected funding sources, particularly CIL and Planning Obligations*: to give clarity and honesty about the extent of any gap likely to remain. This would give an indication of what might be achieved, and what not. This could allow an informed view of development and likely supporting infrastructure.

(* Inquiry hearings have been made aware of differentials between the amount of CIL that could be viably supported in the Harlow, compared to Epping Forest assumptions. Some assumptions about the viability of locations, and differences between greenfield and brownfield sites, could be made without going into undue detail.)

As the IDP stands, locals and residents look set to be disappointed with delivery and with supporting infrastructure levels.

There is already an appreciable gap between aspirations e.g. as in EB1406 and EB1408 instances stated above.

Documents expected: not 'delivered'

At the hearing on 20/3/19 further revised work was promised by 15/4/19, to allow comments to be incorporated in the current statements (the deadline for which is 25/4/19, so effectively 24/4/19 allowing for posting). The Epping Society expressed concern at the Hearing about the time available to read and absorb its' contents, given the statements deadline.

That work has not been received, and so cannot be considered here. Not knowing what would be changed, I haven't commented on un-revised work.

CIL

The Plan's wording at 6.16 only says that "The Council will consider introducing a Community Infrastructure Levy (CIL)". So it isn't certain that CIL will be pursued.

CIL needs to be a bedrock for Infrastructure and Delivery, and is essential. The substantial funding gaps certainly cannot be closed by Planning Obligations alone: even with CIL they appear to be unresolvable.

Other delivery documents

The Plan relies on Delivery documents in addition to the IDP. These include EB1406: Harlow & Gilston Garden Town Vision (November 2018) published by EFDC 15/2/19.

Transport aspects of this Vision are included above.

Another aspect of this document is wrong (1). Other parts -which are not at fault- contradict the Latton Priory allocation (2) and (3).

1)-As pointed out to the 21/3/19 Hearing, the diagram of views to and from Harlow Town Centre on page 13 is wrong: it shows the Rye Hill Water Tower at 80 metres elevation with Rye Hill rising to 100m and 110 metres to the south. However, Ordnance Survey maps show the Water Tower to be around 106m & 108 metres elevation, with the peak of Rye Hill at 110 metres. Development will be on the south face of the Rye Hill ridge.

2)-Page 11 of the Vision contains a diagram showing clear views of undeveloped distant hills between buildings with text "New development should not mask views towards key landmarks or landscape, either by blocking the view or sitting prominently in the background". Also, "Views of the natural... landscape will be retained...". The housing allocation at Latton Priory will go against these.

3)-Page 12 says "New development... will... enhance the quality and recreational value of Green Wedges...". Plans of the allocation at Latton Priory show development will impinge on the continued line of the existing Green Wedge; while the north-south Public Transport route will run through it, not enhancing quality or recreational value.