



**Epping Forest
District Council**

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epping forest district
planning our future
local plan

Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public or

b) Statutory Consultee, Local Authority or Town and Parish Council or

c) Landowner or

d) Agent

Other organisation (please specify)

2. Personal Details / Agent :**3. Agent's Details (if applicable)/on behalf of :**

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Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)

Paragraph Policy Policies Map
**POLICY SP5

Site Reference Settlement *Please see attached sheet

5. Do you consider this part of the Submission Version of the Local Plan:
*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes No *Please see attached sheet
b) Sound Yes No

If no, then which of the soundness test(s) does it fail*

Positively prepared Effective
Justified Consistent with national policy

c) Complies with the duty to co-operate Yes No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

Please see attached sheet.

(Continue on a separate sheet if necessary)

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached sheet.

(Continue on a separate sheet if necessary)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the hearings

/ Yes, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

In order to provide further information to assist the Inspector in assessing the soundness of the Plan and to inform a decision as to any necessary modifications to achieve this purpose.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes No

11. Have you attached any documents with this representation?

Yes No

Signature:



Date:



POLICY SP5 – GARDEN TOWN COMMUNITIES

- 1 Policy SP5(A) allocates three strategic sites adjoining Harlow as Garden Town Communities. Site SP5.1 is allocated for at least 1,050 homes and 1ha of employment land, along with 0.5ha for up to five Traveller pitches. As set out throughout this representation, we strongly support the allocation of Latton Priory as a new Garden Town Community. For reasons discussed later however we consider that there is potential to increase the land area for development, for both residential and employment use.
- 2 SP5(B) to SP5(E) are intended to apply to all three Garden Town Communities. However this is really the purpose of Policy SP4 and so these provisions should be included in that policy rather than here (to the extent that they are not already covered by Policy SP4. SP5(B) to SP5(E) also, to some extent, pre-state the specific requirements for each site that follow on from SP5(F). Again this results in unnecessary duplication which could undermine the overall effectiveness of the policy.
- 3 In respect of SP5(B), the reference to small-scale retail and community uses is considered appropriate. However, the reference to "small-scale employment" is questionable as we consider that the Garden Town Communities, and Latton Priory in particular, should deliver a strategic employment site, as discussed further in our response to SP5 F(ii).
- 4 SP5(C) relates to infrastructure. As per our response to Policy SP4, we are supportive of the requirement to accord with the IDP, but query whether it can be a fixed policy requirement. The development of the package of infrastructure required to support the delivery of each Garden Town Community will be an iterative process, the detail of which will evolve over time in parallel with the masterplanning of the development. The reference to contributing towards improvements to M11 Junction 7 is supported, and in this respect we have previously put forward specific proposals for an improvement scheme and know that this is a requirement for the development of Latton Priory (and other sites).
- 5 SP5(D) relates to strategic masterplans. Again we are supportive of strategic masterplans in principle but note that this matter is already addressed under Policy SP4, and so the two policies are unnecessarily repetitive.
- 6 SP5(E) requires development proposals to "reflect the design strategy that the Place Shaping and Garden Town principles set out in Policy SP3 and ~~we have been advised~~ as part of the policy is therefore superfluous as it simply draws attention to the fact that the matter is already addressed in Policies SP3 and SP4.

LATTON PRIORY

- 7 SP5.1 relates specifically to Latton Priory:
- 8 We have prepared a detailed and extensive evidence base for the Latton Priory site to underpin our own proposals which essentially consist of the following elements:
 - 2,500 new homes
 - 2,440 new jobs
 - 8 acres of new sports provision
 - 150 acres of new accessible green space

- £180 million of private sector investment
- 1km of new cycleways
- Investment in improvements to the strategic highway network and local road improvements

9 Our vision for the site is as follows;

“Latton Priory will become a vibrant new community, with a comprehensive housing mix, set amongst abundant green spaces using the Garden Suburb principles, as well as incorporating community services and facilities to benefit both new and existing residents. The development also aims to create 2,500 new jobs on a high quality office park.

Strategically located adjacent to Junction 7 of the M11 and Harlow’s southern edge, Latton Priory will be developed to integrate with Harlow’s existing estates to encourage regeneration and provide an extended Green Wedge. The development can deliver up to 2,500 new homes including affordable housing, shops, health facilities, schools, extensive public open space including sports pitches, new pedestrian and cycle routes, as well as bus services into Epping and Harlow and local highway improvements.”

10 We comment below on each component of the Policy SP5.1 in turn below:

SP5 F(i) Site Capacity

11 We can confirm that the proposed allocation is capable of accommodating at least 1,050 homes up to 2033. We consider that the ultimate capacity of the site should be determined through the preparation of the strategic masterplan that is a requirement for each of the Garden Town communities and through the preparation of outline planning applications.

12 We consider that the policy should not attempt to fix the capacity of the site and that the possible identification of additional capacity should be welcomed within the context set by the definition of a robust and long term revised Green Belt boundary.

SP5 F(ii) Employment Land

13 As set out in our representation on Policy SP4 above, we consider that, given the size and scale of the Harlow and Gilston Garden Town, the promotion and allocation of strategic scale employment allocations is vital to delivering sustainable communities within the Garden Towns.

14 The very limited employment provision within the Garden Town Communities in general, and at Latton Priory in particular, reflects the fact that the Harlow area has been given a low priority for new employment allocations. Paragraph 2.73 of the Plan states:

“Significant employment opportunities already exist at Harlow through the relocation of Public Health England and the Enterprise Zone, and further small-scale employment uses will also be provided within the Garden Town Communities to promote the sustainable growth of Harlow and reduce out-commuting.”

- 15 This priority does not reflect the scale and significance of Harlow. We have questioned the emphasis on focusing employment allocations outside the Garden communities in our comments in the section on Employment above. A significant objective of the Garden Town Communities is to achieve a high rate of internalisation of trips and we consider that the provision of only small scale employment is not consistent with this objective. There is a compelling case for the Garden Town communities to become genuinely mixed used developments and Latton Priory offers the greatest potential to achieve this.
- 16 CEG and Hallam Land, in addition to promoting land for a strategic housing allocation at Latton Priory, have promoted a strategic employment site that would adjoin London Road and be linked to the housing allocation. We consider this to be a unique opportunity to make a major contribution towards Epping Forest's employment requirement. Our Client's site would involve a mix of land uses, and could potentially deliver 12-15 hectares of employment land for B-class uses.
- 17 We have compiled evidence base documents to demonstrate the benefits of development to the south of Harlow. All these documents were submitted to AECOM to inform their site selection work for the Council.
- 18 The potential of the Latton Priory site should be viewed in the context of its location as well as its capacity. This is because the location of Latton Priory provides the best opportunity within the District to provide employment land close to existing services and facilities as part of a mixed use sustainable urban extension. It is also well positioned in terms of its transport links, both existing and planned. The site is uniquely placed in relation to the strategic highway network and the programmed improvements to Junction 7 of the M11 will consolidate that advantage.
- 19 CEG and Hallam Land Management commissioned work from Regeneris to assess the economic case for development at Latton Priory. The Regeneris report (September 2013): "The Economic Case for Latton Priory", attached at Appendix 3, demonstrates that development at Latton Priory can:
- Deliver the major proportion of the employment land required to meet the growth in jobs (up to 15ha)
 - Provide approximately 2,170 Full Time Equivalent positions)
 - Reduce out-commuting and diversify the employment offer of both Harlow and Epping Forest Districts
 - Provide higher value business accommodation associated with direct access to the M11
 - Provide development of sufficient scale to ensure sustainability with provision of jobs, homes, shops and services in one location
 - Generate additional expenditure to support the viability of local shops and services to assist the regeneration of South Harlow
 - Generate approximately £2.0 million in business rate revenue per annum for the local authority.

20 CEG and Hallam Land Management also commissioned Employment Market Demand Advice from DTZ in February 2014. This is an assessment of the business park market in the M11 and West Essex sub-region. It demonstrates that Latton Priory offers an unrivalled location for a large employment allocation with strong transport links and would place Harlow/Epping Forest in a strong position in the wider market. The report suggests the site is a solution to the loss of potential occupier investment and jobs through the lack of suitable allocated employment sites at Harlow / Epping Forest.

21 The report concludes:

"There are not the right sites appropriately allocated in the local area to attract large scale occupiers that will foster economic growth— both in the shorter term and to capture the growth anticipated in the longer term. Allocating Latton Priory for employment uses now (alongside housing) would put the Council 'ahead of the field' and more likely to attract a wider spectrum of potential occupiers because of the constrained supply forcing occupiers to look wider."

"..... the advantages of the site could be used to strengthen the economy of Epping Forest and Harlow. Without such an allocation, and with a dearth of other appropriate sites, the growing inward investment anticipated to be considering the area and the wider M11 corridor over the coming years is only likely to go elsewhere."

22 The allocation of only one hectare of employment land embedded within the proposed residential area rather than in a location with good access to the strategic road network is therefore insufficient. It is also problematic.

23 More specifically, we question the basis for the identification of Dorrington Farm as the location for this employment. This site has existing employment uses so it is not clear that its allocation would achieve any net gain in jobs.

24 Paragraph 2.126 of the Plan refers to this allocation providing opportunities for high quality employment uses to be incorporated within the Garden Town. It is not clear whether this refers to existing employment uses on the site or aspirations for alternative higher quality uses or how this transformation is to be brought about. We call for some clarification of whether the 1 hectare of employment land referred to in Policy SP5 F(ii) is simply a recognition of its existing use or represents a proposal to change the status quo.

25 There are therefore doubts about the soundness of the identification of Dorrington Farm on the basis that its purpose is not clear and that it lacks justification.

SP5.1 F(iii) Traveller Pitches

26 This requires the provision of land for up to 5 pitches in order to accommodate the future needs of Travellers. We would welcome the opportunity to engage with the Council in relation to the land requirements for this and a suitable location for this to be situated. Given that the strategic masterplanning process with the Council has not yet commenced we would recommend adequate flexibility is incorporated within the wording of the draft Policy.

27 Further, we would suggest that the provision of pitches at strategic allocations be subject to masterplanning and design considerations within the scope of the process defined by sub paragraph H of Policy SP3.

SP5.1 F(iv) Green Infrastructure and new Green Belt boundary

- 28 We note that the allocation is to include “a new Green Belt defensible boundary to the South of the site”. This is depicted in Maps 2.1, 2.2 (and at a smaller scale in Map 2.5) that show a Green belt boundary traversing the site from west to east.
- 29 We are satisfied that the Council's decision in principle to remove land from the Green Belt and redraw its boundaries is explained and justified by paragraphs 2.133 to 2.142 of the Plan. There is also an evidence base to assess how all areas of Green Belt within the EFDC area perform against the Green Belt purposes defined in paragraph 80 of the NPPF.
- 30 However, we are concerned that the Green Belt boundary shown for Latton Priory is not soundly based as there is currently no evidence to explain and justify the line that has been drawn. The drawing of a new Green Belt boundary is a very important component of the Plan process that must be carried out in accordance with the policy in paragraph 85 of the NPPF. There is at present no published assessment or account of how the new Green Belt line meets these requirements. We note the appendices to the 2017 Site Selection Report have not been published and as such we reserve the right to make further submissions in relation to this evidence base as soon as it becomes available.
- 31 We have nevertheless addressed the issues and considerations involved in the definition of the Green Belt boundary at Latton Priory in terms of first, how it relates to the defined allocation area, second, on what basis it should be defined (in relation to the requirements in the NPPF), third, the specific alignment we consider is justified and; fourth, the potential to extend the area of Green Belt release to the east of the current depicted area.
- 32 First, we consider that the Green Belt boundary should generally coincide with the defined area of each allocation and, for the most part, with the masterplanning area. This approach has largely been followed for the other strategic allocations at Harlow (SP5.2 Water Lane and SP5.3 East of Harlow).
- 33 For the SP5.2 Water Lane allocation, the new outer western boundary of the Green Belt for Harlow generally coincides with the western limits of the allocation area. The only exception to this is the drawing of the Green Belt boundary to exclude pockets of existing development which are adjacent to, but not within the allocated site. The western limits of the masterplanning area also generally coincide with the defined masterplanning area.
- 34 For the SP5.3 East Harlow allocation, the new boundary of the Green Belt also generally coincides with the alignment of the allocation area (although the masterplan area extends to include a larger area to the south of the allocation).
- 35 For the SP5.1 Latton Priory allocation, the new Green Belt boundary cuts across and falls well within the allocation and masterplanning areas, for reasons that are not explained.
- 36 At Latton Priory there are particular reasons why it would be sound to align the new Green Belt boundary with the allocation and masterplan areas.

- 37 First, the southern boundary line of the defined allocation area in Maps 2.1 and 2.2 follows or is close to east-west tree belts, field boundaries and hedge lines that represent a more logical new southern Green Belt boundary to Harlow (subject to the points we make under para 5.78 below about this alignment and our proposals for some variation to it). This would be more consistent with NPPF para 85 which states that when defining new Green Belt boundaries Local authorities should, inter alia: *“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”*.
- 38 Further, if the allocation and Green Belt boundaries were in alignment it could allow space within the allocation and masterplan area to provide additional planting to reinforce the boundary features already evident here. Thus, the existing boundary features, re-inforced by additional planting, would provide a buffer line to preserve the openness of the Green Belt beyond.
- 39 In contrast to these considerations, the Green Belt line shown on maps 2.1 and 2.2 for Latton Priory appears to be based on a contour line only and follows no recognisable physical features. The Green Belt line shown on these maps does not relate to any existing hedgerows, field patterns or historic structures on the ground.
- 40 If the new Green Belt boundary is defined in line with the allocation and masterplan area, it will allow the Council and developers to jointly consider the limits of the built development area (and in particular its southern extent) through the masterplanning process, together with appropriate additional planting and screening between built development and the new Green Belt boundary. We therefore consider that the proposed Green Belt boundary should be modified to coincide with the proposed site allocation boundary (subject to the adjustments we have recommended in paragraph 5.78 below).
- 41 This process of defining the limits of the development area through the masterplanning process can then take account of such factors as the “ridge line” to the south of the town informed by a detailed site specific landscape impact assessment.
- 42 It should be noted that the “ridge” is not a clear physical feature running west – east that is evident on the ground. It represents the highest point of the land as it rises south of the town appearing as a ridge line when viewed from the Harlow urban area. It represents the point where land ceases to rise and gradually levels off but it does not do so abruptly or distinctly on the ground and is not appropriate as the basis for a Green Belt boundary.
- 43 A further consideration here in commenting on the new Green Belt boundary at Latton Priory is that Map 2.1 shows an *“indicative access road for Latton Priory”* outside the new defined Green Belt boundary. There are separate considerations here that are dealt with elsewhere in this representation. The key point in the context of consideration of the Green Belt boundary is that it is not logical to show a road immediately beyond this boundary as this will compromise the clear definition of a line that separates the allocation from the open Green Belt beyond.
- 44 In conclusion we consider the Green Belt boundary shown on Maps 2.1 and 2.2 (and as broadly defined in Map 2.5) to be unsoundly based and that it should be moved further south to align with clear physical features on the ground that can be reinforced through additional planting.

- 45 **Appendix 4 "Green Belt Boundary Proposal"** shows our preferred alignment for a new Green Belt boundary at Latton Priory. As indicated above, in terms of its west – east alignment, from Rye Hill Road in the west to Latton Priory Farm to the east, this is similar to the allocation and masterplan boundaries shown on maps 2.1 and 2.2 of the Local Plan with two differences:
- a) we have drawn the Green Belt boundary between the Rye Hill Moat and Rye Hill Road as an implied continuation of the field boundary which extends the boundary slightly further south
 - b) we have drawn the Green Belt boundary further south to reach a tree / hedge line that would define the southern limits of the extended Harlow Green wedge as green space outside the Green Belt.

Green Belt Review and Scope for Additional Release at Latton Priory

- 46 **Appendix 4** also shows our proposal to extend the new Green Belt boundary line east of the point where the Council's line turns north, east of Latton Priory Farm. This will continue the east-west alignment based on field boundaries, tree belts and hedge lines to run along the access road to the farm, reaching London Road after looping south around a copse of trees that provides visual containment.
- 47 This will provide additional areas of housing south of Marks Bushes and Latton Park including a strategic employment area adjoining London Road at Junction 7 of the M11. We have set out our case for an increased, strategically important employment allocation at Latton Priory in our representations on sub paragraph F (ii) of Policy SP5 above.
- 48 Map 2.1 shows an indicative access road for Latton Priory and this also forms part of our own proposals for access to the site. It is important to consider the need for this road, the form that it takes and its alignment in the context of the new Green Belt boundary. We consider this road strengthens the case for additional Green Belt release at Latton Priory to the east of the currently proposed allocation area.
- 49 The Latton Priory access road will run to the east of the current allocation area to provide access to London Road. In the absence of development, this road will nevertheless impact upon the Green Belt in this area to the east of the allocation as currently defined. We consider this fact must be considered as part of the process of defining the Green Belt boundary in relation to the extent of the Latton Priory allocation. It changes the circumstances against which a new Green Belt alignment should be considered in the current plan or future plan reviews, and should form part of the more detailed assessment of the revised Green Belt boundary that we have called for above.
- 50 The option of incorporating the access road within an extended development area should be considered so that the Green Belt boundary is then defined by a landscape buffer at its outer edge rather than a road. This will also assist in avoiding the road being used as an alternative southern link as there is greater scope to control vehicle movements if the road is embedded within a development area. An access road within an area of additional development would also be more viable and deliverable.

51 If the Green Belt boundary is not aligned in the current Plan south of the access road to Latton Priory, consideration should be given to safeguarding an area of land for future housing and employment in this area in accordance with the provisions for safeguarding land within NPPF paragraph 85. We consider that the Council needs to consider the provisions of paragraph 85 specifically in the context of the Latton Priory Green Belt boundary, notably to:

- Assess whether Green Belt boundaries will need to be altered at the end of the Plan period
- Identify in the plan an area of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching beyond the plan period
- Make clear that planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development

52 Our further justification for an additional release of Green Belt land at Latton Priory is set out below. This is based first, on an assessment of the Council's Green Belt review process and of its conclusions for Latton Priory and; second on our own review of Green Belt boundaries at Latton Priory undertaken by landscape consultants FPCR enclosed at **Appendix 5** to these representations.

Review of Council's Stage 1 and Stage 2 Green Belt Assessment

53 The Latton Priory site falls within the broad parcel DSR 073 identified for the Stage 1 assessment. This parcel is not uniform in its characteristics and contains areas of land that are fundamentally different in terms of landscape form, topography and defining characteristics. For this reason the overall assessment against Green Belt purposes is not informative in identifying areas for potential Green Belt release as it includes areas that are very effective, as well as areas that are much less effective, in serving a Green Belt purpose.

54 For the Stage 2 assessment a number of sub parcels of DSR 073 are defined that include areas defined by the Council and by our clients as suitable for development, namely parcels 073.1, 073.2 and 073.3.

55 In the case of parcels 073.1 and 073.2, the Stage 2 assessment records overall harm (if these parcels were developed) as "very high". In the case of parcel 073.3, the assessment records "high". It is however important to note that these judgements are based on these parcels having a strong performance against only the 1st Green Belt Purpose "*to check the unrestricted sprawl of large built up areas*". The assessment against the 2nd and 4th purposes for all three parcels is "no contribution" and only a moderate contribution is indicated for the 3rd purpose.

56 In this respect we question the methodology of the Stage 2 assessment in indicating a "very high" harm rating when only one Green Belt purpose is materially affected.

57 Further, the stage 2 assessment criteria do not allow the topography to be taken into consideration in the judgement as to whether the parcel contributes to Purpose 1 "*to check the unrestricted sprawl of large built up areas*". Parcels 073.1, 073.2 and 073.3 (as well as some of the land within the wider parcel 073.5) fall within the Harlow landscape bowl and the "ridge line" that defines and contains this area. This topography does effectively restrict the sprawl of Harlow and needs to be considered in making judgements about these parcels against the 1st Green Belt purpose.

- 58 We also note from Appendix A: "Residential and Employment Site Selection Methodology" accompanying the report on site selection by Arup that the third Green Belt purpose "to assist in safeguarding the countryside from encroachment" is not applied in the site selection process employed for non-Harlow sites. However, it would appear that this Green Belt purpose has been applied to the selection of Harlow sites and would be grateful for some clarification regarding any inconsistency of approach on this point.

FPCR Green Belt Assessment

- 59 We have carried out our own assessment of the area we consider developable at Latton Priory against Green Belt purposes, based on a smaller site area than that used in the Councils analysis referred as DSR073. This forms Chapter 6 of a report commissioned by CEG and Hallam Land Management: "Landscape and visual study – A vision for a Green infrastructure Future by FPCR" Dec 2013 (The fpcr study) (attached as Appendix 5). The results of this study for the Latton Priory site are summarised below.

Green Belt purpose	Assessment
1. Check the unrestricted sprawl of large built-up areas	Landform and significant blocks of woodland provide natural containment and strong defensible boundaries to sprawl, subject to capacity limits
2. Prevent neighbouring towns from merging	No settlement coalescence issues
3. Assist in safeguarding the countryside from encroachment	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
4. Preserve the setting and special character of historic towns	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. However, the containment function of the wooded skyline can be preserved.
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land	Southern estates adjoining development 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)

60 We therefore conclude that the Council's Green Belt study tends to over emphasize the Green Belt purpose of land within parcels 073.1, 073.2 and 073.3, and in part 073.5. Our own assessment, that was made more specifically in relation to a development area defined and limited by the topography, indicates that this area, for the most part, does not fulfil Green Belt purposes.

Green Infrastructure

61 We support the requirement within sub paragraph F (iv) to provide strategic green infrastructure at the site.

62 We are proposing up to 150 acres of new accessible green space, incorporating an extension to the Southern Harlow green wedge, parks, allotments, sports facilities, play and recreational facilities. Much of this provision is identified within the attached Framework Masterplan.

63 The existing green open spaces around the Latton Priory site comprising woodland, hedgerows, green wedges and other planted elements, provides the basis for establishing the Green Infrastructure within the development. The Green Infrastructure will be a biologically diverse range of planted areas linking together across the site to provide wildlife corridors and will include extensive areas of multifunctional open space. This will include formal recreation such as playing pitches, grassland habitat, new tree planting, allotments and parks, which will be fully integrated and easily accessible by both existing and new residents.

64 There will be a wide range of new accessible areas of open space on the Latton Priory site including various communal areas. A new village green is proposed adjacent to the local centre and a number of small equipped play areas will be located throughout the layout to allow local children to easily access opportunities for recreation and play. Formal recreation is proposed within the centrally located green wedge. A detailed SuDS strategy is currently being developed, but principally, a number of attenuation areas are proposed along the northern and southern edges of the development. It is likely that swales running north south will allow for natural surface water drainage

SP5 F(v) land within the Green Belt and Masterplan Area

65 The question of how the new Green Belt boundary relates to the allocation and masterplanning areas is addressed under sub paragraph F(iv) above. We envisage a clear Green Belt boundary that coincides with the limits of the allocation. Beyond this the land would remain open and retained for appropriate uses within the Green Belt.

SP5 F(vi) Sympathetic Design

66 CEG and Hallam Land Management are committed to the highest standards of design and endorse the standards, requirements and design process set out in Policy SP4 subject to the observations and comments we have made on the detail of this policy above.

SP5 F(vii) Local Centre

67 We support the provision of a local centre as part of the proposals for Latton Priory. The nature, location and scale of this facility can be addressed through the masterplanning and design process

SP5.1 F(viii), (ix) and (x) Primary and Secondary Schools

- 68 We support the principle of a secondary school within the Latton Priory site subject to consideration of its optimum placing within the site through the masterplanning process and a fair apportionment of all the costs involved (including land) in the light of the fact that the school will meet needs well beyond those generated by the Latton Priory site at its current indicated capacity. We consider that locating the school at Latton Priory warrants further consideration of the level of residential development to support it and which will benefit from it.

SP5.1 F(xi) Community and Health Facilities

- 69 We support the provision of community and health facilities at the Latton Priory allocation and will plan actively for their provision through the masterplanning and application stages and beyond.

SP5.1 F(xii) Highway and Transport Improvements

- 70 We note the conclusions of the AECOM report with regard to transport and accessibility at Latton Priory. The Site assessment states:

"Significant potential exists to mitigate trip generation at the site through promotion of sustainable modes, and wider network impacts through the implementation of physical mitigation measures e.g. potential for a sustainable transport corridor linking Site A and M exists through the green wedge. The site is relatively well located for schools, employment, bus stops, footpaths and the strategic road network"

- 71 To demonstrate that Latton Priory can deliver both a viable and sustainable transport solution, Brookbanks Consulting have previously completed a detailed Transport Study to assess the site.
- 72 The Transport Study assumed up to 2,500 residential units on the Latton Priory Site, which ensures a higher limit of housing could be accommodated. Furthermore, a range of secondary developments had been included to ensure that the cumulative effect of development delivery had been taken into account. The assessment presented therefore accounted for a worst case scenario.
- 73 The modelling had been guided by the use of the Essex County Council (ECC) Saturn model. This ensured consistency with other studies being carried out at the time. Detailed discussions have occurred with ECC over recent years to agree the modelling approach. This has included agreement to several fundamental elements of the assessment.
- 74 The results of the assessment demonstrate that the development at Latton Priory can be delivered, and together with the improvements at Junction 7, will bring benefit and newly released capacity to the operation of the wider network.
- 75 It is noted that Essex County Council are currently upgrading their Saturn model to a town-wide Paramics model. We seek to validate our previous modelling exercise with this paramics model in due course to provide a final confirmation to the acceptability of our results.

Improvements to strategic highway network

- 76 A range of robust highway improvements has been identified that will ensure that Latton Priory can be delivered with a nil detriment to the existing network, and prior to the delivery of proposed Junction 7a, such that the road network will still operate within acceptable limits.
- 77 As well as Junction 7, those junctions most likely to be effected by the Latton Priory site, as defined by Essex County Council, had been assessed. The result of this assessment indicated that the junctions primarily along Southern Way, including the junction with the A414, will need to be improved.
- 78 The proposed improvements along the Southern Way corridor include the signalisation of the majority of junctions assessed. The identified interventions will deliver a better than nil-detriment solution.
- 79 Through discussions with Essex County Council, a study has been carried out that investigates Southern Way. This includes downgrading the highway corridor with the option to reduce the road classification to a 'B' road. The proposed conversion of the junctions into signal controlled could reinforce the reduced importance of Southern Way. This strategy requires further consultation and agreement with Essex County Council.

Access to the Site

- 80 In respect of an access strategy, three points of highway access will be delivered in a phased approach. The site is strategically well placed to gain access from a number of locations on the local highway network. However, it is considered that the most appropriate vehicular points of access are:
- Rye Hill Road
 - B1393 London Road
 - Fern Hill Lane
- 81 These roads have been reviewed fully against national design standards to ensure that suitable access can be gained. The access strategy has identified the improvements that are necessary which is likely to include localised road widening. This will ensure that the routes into the site are suitable for the level of traffic predicted. This will also ensure suitable access for public transport vehicles which is fundamental for the delivery of a sustainable development.
- 82 Each point of access is discussed below:
- 83 **Rye Hill Road:** located off Paringdon Road, has a footway along its western kerb line for the first kilometre. South of this point, the proposed upgrade of Rye Hill Road will be able to provide a footpath on both sides of the carriageway.
- 84 **London Road:** located to the east of the site, there are currently no pedestrian facilities and it is considered that there would not be a strong desire line along London Road. However, the scheduled improvements to Junction 7 will include increased pedestrian and cyclist connectivity. Therefore, the Latton Priory site will coordinate its pedestrian and cyclist amenities to continue the proposed enhancements brought forward by the Junction 7 works.

- 85 **Fern Hill Lane:** located towards the western end of Commonside Road, has a footway along its eastern kerb line which terminates approximately 300 metres from the junction with Commonside Road. It then narrows down to a single carriageway road towards the site boundary. There is opportunity to widen the road on its current southern extents to offer a more robust access way.
- 86 **Riddings Lane:** located towards the eastern end of the Commonside Road, has footways along both sides of the kerb line until it passes the Latton Green School. It then has a footway along the eastern kerb line, which terminates approximately 300m from the site boundary. North of the access to Latton Green School, there is a combined off road cycle /pedestrian footpath that cuts across to Commonside Road.
- 87 Consultation with Essex County Council has confirmed that a vehicular access into Latton Priory from Riddings Lane is not desirable due to the very narrow carriageway width possible to install. Therefore, a comprehensive pedestrian and cyclist connection strip can be provided in isolation.
- 88 The routes described above could also deliver off street cycle routes. The following shared pedestrian/cycle footpaths will be considered:
- 89 **Rye Hill Road:** A shared pedestrian/cycle path of 2.5 – 3m on the eastern verge of Rye Hill Road, to connect with Paringdon Junior School and the existing pedestrian cycle link that runs north from the school, past the Staple Tye Shopping Centre on Southern Way, and up to the junction of Three Horseshoes Road and Third Avenue.
- 90 **Fern Hill Road:** A shared pedestrian/cycle path of 2.5 – 3m to connect with the pedestrian cycle link that runs north from Commonside Road, just west of Copshall Close to the Staple Tye Shopping Centre on Southern Way.
- 91 **Riddings Lane:** Potential for a shared pedestrian/cycle path of 2.5 – 3m to connect with the pedestrian cycle link north of Latton Green School.
- 92 However, due to the low level of activity on Fern Hill Lane and Riddings Lane in their existing arrangement, cyclists could be allowed to share the road surface with other users.

Walking / Cycling Routes

- 93 The site will be able to assist in the delivery of a new 'west-east' transport corridor. This has the potential to not only deliver a new strategic route for Harlow traffic but also provide a series of walking and cycling benefits.

North – South Public Transport Corridor

- 94 Within the Harlow Strategic Site Selection Report, the following opportunity is identified,
- 'In addition, analysis from Essex County Council has identified the potential for a sustainable transport corridor between the Gilston (Sites A and E) and Latton Priory (Site M) and a complementary east-west sustainable corridor also.'*

- 95 Essex County Council make the following critical observation, that

'Sustainable travel corridors are a key element of 'garden settlement' approach. It is important to note that the north-south sustainable corridor would be contingent on a sufficient critical mass of development at M (Latton Priory) to deliver the necessary infrastructure including access to the M11 in addition to the corridor.'

96 It is further recognised within this report that,

'Delivery of ~1,000 units has been assumed for this site in this report reflecting the landscape constraints encountered, but this lower level of growth may adversely affect the potential to establish a sustainable transport corridor linking to the Town Centre and sites to the north, and to limit impact on the local road network.'

97 As part of this work, Highways England specifically refers to the potential of the Latton Priory site to improve links-to the town centre, rail station and employment sites and potentially to other development sites around the town.

98 We 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.

SP5.1 F(xiii) Water Supply and Waste Water

99 These requirements will be addressed through the normal planning process in consultation with the relevant stakeholders.

SP5.1 F(xiv) Bus Services and pedestrian and cycle links

Bus Services / Public Transport

100 In terms of public transport, the development is likely to be delivered in phases and will need to be reflected in the strategy for improvements to public transport routes. To ensure the long term viability of any improvements, the likely patronage levels also need to be considered.

101 A fast reliable public transport system is able to provide a viable alternative to the motorcar and a shift toward this mode of travel is essential for the development to be considered sustainable. To consider the potential routes, it is important to understand both the inbound and outbound trips that are likely across Harlow both at a local and strategic level.

102 To secure development and route viability, it is likely that initial development phases could be served by extending the existing bus routes. The existing routes 2 / 3 and 4 have been identified to serve the area north of the development, which can be extended and improved to serve the initial phases. It is envisaged that the existing routes would be extended to penetrate the site such that any future dwellings are a minimum of 400m of a bus stop.

103 On commencement of Phase Four and the link road between the phases is complete, it is considered that the development could support the provision of a new dedicated service. This new dedicated service will penetrate the site using identified roads that have been designed to cater for public transport vehicles.

104 Tellings Golden have been consulted on this strategy and have confirmed support for the proposals.

- 105 It is anticipated that the key destinations for this new route are likely to be Harlow town centre and the Harlow Town train station. Furthermore, the route through Harlow will be carefully selected to ensure that other key local services and amenities will be served to improve integration with Latton Priory.
- 106 A circulatory route that commences from the Harlow Town train station and serves both the town centre and Latton Priory has an anticipated 30 minute journey time. Taking into account stoppages and delay, it would be reasonable to assume that a public service vehicle could reasonably carry out this journey in one hour.
- 107 To maximise the attractiveness of public transport, it is important that the routes operate at high frequency times of peak demand. Therefore it is envisaged that during the morning and evening peak the routes will operate at a 20 minute frequency reducing to half hourly off peak and weekends. Any facilities that are to be provided, bus shelters etc., should be high quality and consideration should be given to the provision of Real Time Passenger Information.
- 108 It is acknowledged that the current network of public transport coverage within Harlow is hindered by highway capacity constraints. Priority should be incorporated into the local road network to improve public transport movement in and around Harlow.
- 109 Together with road based public transport, the inadequate existing facilities at the existing rail stations are also identified and the accessibility could be potentially improved.
- 110 The robust and expansive range of possible offsite transport links offered at Latton Priory gives significant support to a possible north-south strategic transport corridor. We would support discussion to coordinate such an initiative.

Pedestrian and Cycle Links

- 111 Latton Priory already benefits from a good walking and cycling network, although this would be improved by future development. To ensure that the development encourages walking and cycling, it is important that the site delivers both on-site and off-site enhancements.
- 112 The masterplan will include a comprehensive network of walking and cycling routes through the site that will connect the housing blocks with the local facilities proposed within the development. The network should be inclusive to all potential users on site and cater for employment, retail, education and leisure based trips.
- 113 The on-site walking and cycling network should include strong links into the existing off-site networks such that walking and cycling is a viable alternative to the motorcar to access the off-site facilities.
- 114 The off-site network will include a high quality links into Harlow town centre, including the train station to improve integration and co-existence.
- 115 Together with the links identified above, it is vital to include strategic links into Harlow, together with the potential allocation that could provide employment opportunities. There will be a clear distinctive desire line between these and the site. As such a high quality route needs to be delivered to encourage the safe movement of both pedestrian and cyclists.

- 116 To the north of the site, a network of Public Rights of Way pass through a corridor of green open space linking through to the town centre. This PRow network provides an attractive and alternative direct route to the town centre and also provides access to local facilities including shopping and education land uses. The site will provide links into the PRow network.
- 117 The off-site leisure networks will be improved to ensure the full integration of the potential development into the south Harlow hinterland.

Maps 2.1, 2.2 and 2.5 and Landscape containment

- 118 We have referred above to our concern that the Green Belt boundary line shown in these maps is unsound as it is not justified in the evidence base. It is in fact inconsistent with the assessment in the principal evidence base document for the Latton Priory site i.e. the AECOM report as the Green Belt boundary line shown in Maps 2.1 and 2.2 cuts through the area identified for development by AECOM. There appears to be no evidence base at present to explain this inconsistency.
- 119 We consider that the characteristics of the landscape at Latton Priory support the principle of development, determine the capacity of the site and how the Green Belt boundary can be realigned to protect its essential integrity and purposes.
- 120 The landscape evidence demonstrates that Latton Priory can create a logical and defensible Green Belt boundary realignment based on the landform and natural features in the landscape. It also provides an opportunity to extend Harlow's southern Green Wedge into the site.
- 121 The fpcr study **Appendix 5** seeks to define a new robust Green Belt boundary that will provide effective landscape containment of new development with no encroachment on Harlow's wider landscape setting. It shows how around 75 hectares of future built development will be encompassed and subdivided by 175 hectares of accessible green infrastructure. Key findings are:
- Development can be confined to limited areas of land contained within the landform adjacent to the settlement edge (safeguarding the countryside from encroachment).
 - Development will utilise land orientated towards Harlow and can be designed to preserve the setting and character of Harlow as defined by Frederick Gibberd.
 - The landform and blocks of woodland provide natural containment and strong defensible boundaries to check unrestricted sprawl.
 - There is no possibility that development would lead to neighbouring settlements coalescing or settlements merging into one another.
 - Development will be linked with the Harlow southern estates and the new Green Belt boundary will help meet the Green Belt purpose of assisting urban regeneration
- 122 There is the opportunity to enhance the landscape through Green Infrastructure that will provide east-west links between the housing and employment areas and a robust definition of the development's southern limits.

- 123 We note that the "Harlow Strategic Site Assessment" by AECOM, (the AECOM report) in its assessment of Latton Priory states:

"Analysis from AECOM landscape specialists (see Appendix 2) found that the plateau at the top of the ridge should not be developed, as this would have the potential to result in significant effects on the local landscape and views. New development should therefore be set down on the northern side of the ridge, such that the roof line is below the top of the plateau. This would allow space to substantially strengthen the woodland on the southern edge of the ridge in order to lessen the visual impact of the development from Harlow and from the rural area within Epping Forest District. This would also create opportunities for further green infrastructure improvements linking the proposed development and Harlow more generally with the wider landscape."

- 124 We agree with some of the principles set out here. However, the principal point is that development should be contained within the landscape and it is not necessary to limit development to a particular AOD line to achieve this. Moreover, the plateau is capable of accommodating some development subject to detailed consideration of landscape impacts including visibility sections such as are provided in the report by fpcr (Appendix 5)
- 125 We therefore consider that the precise limits to development should be defined through the masterplanning process in the light of these landscape considerations.

SP5.2 and SP5.3: Water Lane Area and East Harlow

- 126 We have given extensive consideration above to the definition of the new Green Belt boundary in the context of the Latton Priory allocation. We have noted some inconsistency of approach in the definition of the boundary between the three strategic sites. We are also concerned that the approach to releasing land from the Green Belt does not give equal and balanced considerations, between the three strategic sites, to the purposes of the Green Belt and related constraints.
- 127 At Latton Priory, we are concerned that there is no clear rationale for the alignment of the revised Green Belt boundary within the Plan or its evidence base. The new Green Belt boundary appears to be based solely on a contour line and does not address the criteria in NPPF paragraph 85. Topography appears to be the only consideration and constraint in relation to the position of the Green Belt boundary.
- 128 However, there are additional considerations and constraints at Water Lane and East Harlow (in comparison with Latton Priory) that may limit the allocation area and suggest the Green Belt boundary realignment may be too expansive.
- 129 Further, although we do not dispute the principle of allocating these sites, we note that site constraints in both cases may limit their capacity to a level below that currently proposed, that they are more dependent upon provision of new infrastructure than Latton Priory, and may not be capable of sustaining the same rate of delivery as Latton Priory (in part due to the concentration or saturation of the market – particularly at East Harlow).

Water Lane

- 130 Water Lane has a number of landscape and heritage constraints, not evident at Latton Priory, not least the designated heritage asset of the adjacent Nazeing and South Roydon Conservation Area, which is judged to be an “historic and attractive countryside” This Conservation area is described as follows:

“This Conservation Area is the largest in the District and covers a wide expanse of historic and attractive countryside between Harlow and Lower Nazeing. It includes: the medieval 'long green' settlements of Middle Street and Halls Green; Bumble's Green and the medieval 'closed field' system to the north; and the medieval settlements of Nazeing, Broadley Common and Roydon Hamlet. The well preserved medieval settlements and 'closed field' patterns are important landscape features which form a fundamental part of the character and appearance of the area.

Together with the open or common field systems, these landscape features give each settlement a distinctive setting. Although the field enclosures and patterns are not discernible close to, the area can be clearly distinguished from viewpoints at Nazeing Church and Perry Hill. The area retains its quiet, intimate, small-scale rural qualities characterised by small grassed fields that are dissected by narrow, winding lanes and footpaths and bounded by tall hedgerows and mature trees.

- 131 The Water Lane site lies within the Roydon Hamlet LCA and the Bumble's Green LCA. Both are considered to be of moderate to high sensitivity to change. The Roydon Hamlet LCA refers to:

- *“Historic Medieval field systems and glasshouses are sensitive historic landscape features. Framed and open views into the corridor of the River Lea to the west and open views across undulating farmland are visually sensitive to new development.”*
- *Any potential new development within the area is therefore likely to be visually prominent if not designed sensitively.*
- *this Landscape Character Area is considered to have moderate to high sensitivity to change”*

- 132 The following landscape and environmental issues would need to be addressed, which may result in significant design and mitigation measures that reduce the capacity for housing within the allocation.

- *The site borders the extensive Nazeing and South Roydon Conservation Area. The Impact and effects on the Conservation Area are important considerations.*
- *Potential coalescence and settlement identity issues (i.e. Harlow extending into the context of the settlements at Halls Green, Roydon, Tylerscross and Broadley Common, and potentially Nazeing).*
- *Loss of Medieval field systems and characteristic glasshouses*
- *Views from the River Lea corridor to the West.*
- *Impacts on the Parden Brook and its associated habitats.*
- *Landscape and ecological constraint of woodland at Lower Wood, Upper Wood, Harold's Grove and Pardon Wood.*

- *Harold's Grove -ancient and semi natural woodland.*
- *Potential impacts upon the setting of the Grade II Listed Buildings (10nr). To include Tylerscross Farmhouse Brookside Cottage (Water Lane), Richmonds Farmhouse and Merryweathers Farmhouse.*

133 Our purpose here is not to question the principle of the Water Lane allocation but to draw attention to the need for a consistent and evidence based approach to the consideration of Green Belt purposes, strategic site constraints and the factors involved in Green Belt boundary realignment between the three sites.

East Harlow

134 This has a number of heritage and landscape constraints. Part of this allocation lies within the River Stort Landscape Character Areas (LCA). The Epping Forest Landscape Character Assessment (2010) records that the sensitivity of this landscape is "high". (NB: Latton Priory lies within Jack's Hatch to Church Langley LCA which is of moderate sensitivity).

135 The River Stort LCA states :

"There is relatively strong historic integrity as a result of the historic field pattern and medieval parkland. This predominantly historic field pattern is sensitive to changes in land management. As a result of the above factors, this Landscape Character Area is considered to have high overall sensitivity to change"

136 The following landscape and environmental issues would need to be addressed which may result in significant design and mitigation measures, such as landscape buffers etc that may reduce the capacity for housing within the allocation.

- Harold's Grove -ancient and semi natural woodland. Impact on the setting of Sheering Hall (Grade II* Listed Building) which is surrounded by the allocation.
- Potential impacts upon The House, Marsh Lane Registered Park & Garden and the Pishiobury Registered Park & Garden that lie to the west, and the Down Hall Registered Park and Garden to the east.
- Potential impacts upon the setting of the Grade II Listed Buildings at Aylmers Farm and Dorrington Hall on the other side of Harlow Road.
- The site lies in close proximity to 'Old Harlow' and its surrounding landscape.
- Impacts upon the landscape feature of Pincey Brook and its associated habitats.
- Challenging topography in comparison to the plateau that covers much of Latton Priory.
- The interface with the embanked M11 (i.e. noise attenuation and landscape buffers will be required).
- Potential coalescence and settlement identity issues (i.e Harlow extending into the context of the villages of Sheering and Lower Sheering).
- Landscape and ecological constraint of woodland and ponds at The Mores.

137 As stated above in relation to the Water Lane allocation, our purpose here is not to question the principle of the East Harlow allocation but to draw attention to the need for a consistent and evidence based approach to the consideration of Green Belt purposes, strategic site constraints and the factors involved in Green Belt boundary realignment between the three sites.

