



**Epping Forest  
District Council**

www.eppingforestdc.gov.uk



## 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.

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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](mailto:LDFconsult@eppingforestdc.gov.uk)

**BY 5pm on 29 January 2018**

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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*

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### 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:**

Title	Mr	Mr	Mr
First Name	Mike	David	Tom
Last Name	Newton	Lewis	Thornewill
Job Title (where relevant)			Hallam Land Management Ltd
Organisation (where relevant)	Boyer	CEG	
Address Line 1	Crowthorne House	Sloan Square House	10 Duncan Close
Line 2	Nine Mile Ride	1 Holbein Place	Moulton Park
Line 3	Wokingham	London	Northampton
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Telephone Number	01344 753 225		
E-mail Address	mikenewton@ boyerplanning.co.uk		

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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 SP2 - The Principle of Major Growth at Harlow

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 SP2 – The Principle of Major Growth at Harlow**

- 1 We strongly support the importance attached to growth at Harlow by the HMA authorities and the specific recognition given to this by Epping Forest in the Pre-Submission Local Plan. This principle is driven by important economic, social and environmental considerations as outlined in paragraph 2.56 of the Plan, as well as the urgent need to bring about Harlow's regeneration. We consider that the Plan should make specific reference to the regenerative benefits of focussing major growth at Harlow, as the regeneration of Harlow is a key issue for the whole HMA.
- 2 The strengths, opportunities and challenges of Harlow are well-documented. Harlow provides a range of services and facilities as well as housing and employment opportunities. The town has good rail links to London, Stansted Airport and Cambridge. To the east of the town is the M11 motorway which is a key north-south route linking London to Cambridge and beyond. The M25 (3 miles to the south of Harlow) provides access to other parts of London and the wider south east.
- 3 A series of enhancements are planned for the rail link to Harlow. The new rail franchise will deliver a complete replacement of all carriages by 2020. Proposals for 4 tracking into Tottenham Hale could deliver greatly enhanced services by 2025, ahead of the arrival of Crossrail 2 in 2032. The Crossrail 2 Growth Commission set out an ambitious growth projection that would be enabled by Crossrail 2. The Commission interrogated the potential for intensification, as well as the intelligent release of Green Belt and industrial land, as a means to fully capture the benefits of Crossrail 2.
- 4 Harlow has traditionally been a good location for major businesses. Harlow is also home to one of 24 Enterprise Zones set up across England in 2011 to promote business growth and job creation. The Enterprise Zone's aims and objectives reflect wider economic growth aspirations for the town which seeks to boost economic growth, diversify the economic base and capitalise on the town's proximity to the Cambridge and London economies and connections to the rest of the UK and beyond.
- 5 The relocation of Public Health England (PHE) to Harlow will provide up to 2,750 jobs and, with potential expansion, this figure could reach 3,250. The new £400 million world-leading home for public health science will be fully operational in 2024, with the first staff arriving in Harlow in 2021. The provision of new homes and specifically larger, quality housing is a concern in this context.
- 6 Harlow experiences a number of challenges, including industrial decline, ageing/inadequate infrastructure, localised deprivation and lower educational attainment. Harlow's town centre and housing require regeneration, the infrastructure needs upgrading and new businesses are required to provide for employment needs. Significant growth will help generate the resources necessary to address these issues and new housing will offer a much improved mix, diversity and quality of housing in the Harlow area with the required level of affordable housing.

- 7 All of the above also contributed to the recent confirmation of Harlow-Gilston as one of the new generation of Garden Towns, originally receiving government support in January 2017, with a further funding allocation of £175,000 confirmed in October 2017 to help speed up the progress of developments through additional dedicated resources and expertise. All Garden Towns being supported by government are committed to delivering high quality, well-planned and well-designed new communities that will stand out as exemplars of good development in years to come. The relevance of Harlow's Garden Town status is discussed further in relation to Policies SP4 and SP5 later in this representation.
- 8 Overall, the principle of growth around Harlow is therefore an essential part of the Local Plan. It represents a logical and effective means of meeting housing need generated in Epping Forest as well as addressing the regenerative needs of Harlow and is essential if the Plan is to be found sound against the tests of soundness in paragraph 182 of the NPPF.
- 9 In focussing growth at Harlow, the Plan directs development to the most sustainable location in the district, where it is most needed and where there is greatest capacity to accommodate new development. In spatial planning terms, this provides a pattern of development which relates to the largest existing urban area.
- 10 Paragraph 30 of the NPPF makes clear that local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. Development adjoining Harlow that is well-related to the existing urban area is clearly an effective means of meeting this requirement.
- 11 This all suggests that growth at Harlow should be maximised. However, the amount of development allocated to Harlow in the Pre-Submission Plan is based on background work that suggests limits to Harlow's growth. Given the compelling reasons set out above for concentrating growth at Harlow, this warrants particular scrutiny. We consider this issue further below. Limiting growth at Harlow on the basis of highways capacity is unfounded. Details below demonstrate the logic and ability of the LP allocation to be further extended.

#### **A Limit to Growth at Harlow?**

- 12 The 'Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire HMA' (AECOM 2016) states that "*The critical issue in determining the overall quantum is the level of development that can be accommodated in and around Harlow on suitable sites during the plan period*" (p.34). This refers to the conclusion that the limit to growth at Harlow is 16,100 dwellings (within the Epping Forest, East Hertfordshire and Harlow Council administrative areas), which was based on the Harlow Strategic Site Assessment (September 2016), prepared by AECOM.
- 13 We consider that this suggested limit to growth at Harlow is a key consideration within the Plan as it is the reason why Epping Forest Local Plan falls some 1,173 dwellings short of the housing supply necessary to meet its OAN. It also places a cap on the proportion of the Epping Forest housing requirement that can be accommodated on sites within the District adjoining Harlow, thus putting pressure on other settlements that are less able to accommodate housing within the District due to constraints and sustainability considerations, and limiting the social, economic and environmental advantages of growth at Harlow.

- 14 The 2016 AECOM Harlow Strategic Site Assessment also states that “The transport modelling undertaken to date demonstrates that growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated provided that the mitigation measures set out in the Highways and Transportation Infrastructure MOU are delivered during the plan period”.
- 15 The latest MoU on Highways & Transportation Infrastructure for the HMA between Essex County Council, Hertfordshire County Council, Highways England and the HMA authorities was published in February 2017. This confirms that one of the key ways in which the range of potential OAN spatial distribution options was analysed was through strategic transport modelling carried out by Essex County Council, using its Visum model. The MoU confirms that this strategic highway modelling assumes that the following will take place:
- planned improvements to M11 junction 7;
  - planned short-term improvements at M11 junction 8;
  - implementation of a new J7A on the M11;
  - A120 Little Hadham Bypass;
  - Public Health England moves to Harlow town (as announced by government);
  - London Stansted Airport growth reaches 35 million passengers per annum; and
  - TEMPRO growth outside the West Essex/East Hertfordshire Housing Market Area.
- 16 The MoU covers the area directly affected/impacted by the growth in and around Harlow. The schemes listed above, as identified within the MoU, are those major strategic schemes which would be required to meet the level of growth being proposed within and around the Harlow area. The MoU does not include specific site level interventions.
- 17 The principal transport evidence in support of the Pre-Submission Local Plan is the ‘Highway Assessment Report’ (December 2017), prepared by Essex Highways, which aims to provide a review of the capacity headroom in Epping Forest and Harlow. Although not directly referenced in the Pre-Submission Plan, it is apparent that the Council considers there to be a cap to additional development being allocated at/around Harlow due to perceived existing transport infrastructure constraints. The 2017 Highway Assessment Report and other available transport evidence base documents have therefore been reviewed by Brookbanks Consulting Limited (BCL) in order to test the validity of this perceived cap.
- 18 BCL’s full Technical Note is included at [Appendix 2](#), but in summary a number of concerns are raised:
- **The VISUM model has not included any junctions within Harlow:** The lack of model coverage within Harlow therefore undermines any of the conclusions in respect of Harlow’s apparent inability to accommodate additional further growth.
  - **The trip rates used in the assessment are generic:** The use of generic trip rates will overestimate the likely trip generation and does not take account of specific development characteristics.



- **Interactions / internalisation between proposed land uses have not been included:** Therefore, the projections are unrealistic in that they are excessively robust, and subsequently contrary to the garden suburb philosophy which seeks to address daily demands within the development, thus reducing external trip generation.
- Trip distribution has been based on Census Journey to Work statistics, but the data has not been provided and, therefore, cannot be assessed: The distribution of trips intrinsically identifies the direction of travel, without assessing this data there is little opportunity to assess whether the development trips have been assigned in compliance with the development aspirations.
- The assessment does not include the strategic highway improvements identified in the MoU, including *inter alia* J7 and the provision of J7a, as identified paragraph 3.9.8: This undermines the resulting conclusions as these strategic schemes have the potential to significantly improve highway capacity.

19 With the extensive highways improvements proposed, including additional capacity at M11 junction 7 and a new junction 7A, we therefore have concerns that this is not a sound reason to place a ceiling on growth at Harlow within the Plan period, particularly given that the previous strategic highway modelling has already taken these improvements into account. Given that appears to be the principal reason for this perceived cap, further justification on this point should be provided as part of the examination in the interests of soundness, in light of the fact that the Council is not proposing to meet its accepted OAN in full.

20 Should further headroom be identified, we suggest that the Council should first look to the existing Garden Town Communities allocated under Policy SP5 to seek to increase capacity where available, in accordance with the Council's sequential approach to locating new homes. Latton Priory is currently proposed to be allocated for around 1,050 dwellings. As detailed in our response to Policies SP4 and SP5 however, the site is considered capable of accommodating up to 2,500 homes, along with 12-15 hectares of employment land for B-class uses. An increased size of the Latton Priory allocation is even more logical with the proposed access road linking the development to London Road, along with the provision of the Secondary School within the allocation.

