

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3428	Name	Sophie	Leaning	Harlow Council
Method	Email				
Date	20/1/2017				

This document has been created using information from the Council's database of responses to the Draft Local Plan Consultation 2016. Some elements of the full response such as formatting and images may not appear accurately. Should you wish to review the original response, please contact the Planning Policy team: ldfconsult@eppingforestdc.gov.uk

Letter or Email Response:

EPHING FOREST DRAFT LOCAL PLAN Thank you for consulting Harlow Council on the above document. Harlow Council acknowledges the collaborative working with Epping Forest (EFDC), under the duty to cooperate, on matters related to strategic cross boundary issues such as housing, employment, the location of future development and infrastructure requirements. In particular, the recognition given to the broader regeneration and growth for Harlow is welcomed. However, there are concerns that the transport and infrastructure requirements that Harlow requires to support housing developments around Harlow has not been addressed. Unless the subsequent Local Plan can address the transportation and infrastructure requirements and ensure that delivered is at a rate and scale to meet the needs of the Harlow's urban area then Harlow would be unable to support the strategic housing locations to the west and south (Policy SP 2 & 3) as the preference is for the strategic housing sites located to the north and north east of Harlow. A separate letter has been sent from Harlow's Portfolio holder which sets out Harlow Council's preferences, concerns and objections. This letter sets out officers' response to some of the overarching issues and themes that Harlow believes are important for EFDC to consider. The West Essex and East Hertfordshire strategic housing market (SHMA) and functional economic Market Area (paras 3.13-3.16) Although Harlow supports the Memorandum of Understanding (MoU) for Strategic Highways and Transport Infrastructure to support the delivery of the strategic housing and economic needs of the area, this MoU does not provide detailed proposals to address Harlow's concerns with regard to the transport improvements required to the south of Harlow. The distribution of Objectively Assessed Need across the West Essex/East Hertfordshire Housing Market Area can only be agreed when the transportation concerns are addressed. In addition a further work is required to address how affordable housing is proportioned and met across the SHMA. Housing: The Strategic OAHN Spatial Options Study (para 3.45-3.70, Policy SP2 & 3) Harlow welcomes that Epping Forest accepts the projection of 51,100 dwellings requirement. The recognition given in para 3.49 to Harlow's sub-regional centre for employment, its Enterprise Zone status and the opportunity to capitalise on its good rail links is supported. However the proposed strategic housing sites identified in Figure 3.4 & 3.7 and Policy SP2 & 3 which relate to the areas to the west and south of Harlow are not supported unless the concerns raised by Harlow on the impact on the transport and infrastructure are addressed. Place shaping (para 3.77-3.79 Policy SP4) The commitment to work with Harlow and East Hertfordshire District Councils and Hertfordshire and Essex County Councils, in partnership with relevant Local Enterprises, to bring forward transformational growth for the area is welcomed. The recognition to achieve Garden City principles in strategically planned developments, as set out in Policy SP4, is supported. Housing and Affordable Housing (para 4.4- 4.14 Policies H1 & H2) It is suggested that the Policy H1 should more directly reflect the Strategic Housing Market Assessment (SHMA) in terms of mix, tenure and size as implied by reference to the SHMA in the proceeding paragraphs. In particular there is concern that the affordable housing (para 4.12 to 4.14 Policy

Response to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3428	Name	Sophie	Leaning
----------------	------	------	--------	---------

H2) is silent on ways to meet SHMA affordable housing requirement and in particular no recognition is given to Harlow's affordable housing need. Traveller site development (para 4.18-4.29) The figures may need to be updated following the outcome of the new Gypsy and Traveller's study. There is concern that there is no recognition that traveller sites proposed in the strategic housing sites may also be need to help meet Harlow's need. Employment (para 4.37 - 4.43 Policy E1) Harlow welcomes EFDC recognitions of Harlow's role as major location for economic growth and the importance of the Enterprise Zone. Harlow would like to continue to work with EFDC to further quantify the employment land requirement to support the strategic housing sites. Retail Policy (para 4.47 4.51 Policy E2) The recognition given that it is an unrealistic position for EFDC to compete against Harlow's retail sub regional role is welcome and that any future retail requirements should be provided in Harlow in recognition that Harlow's town centre serves the needs of Epping Forest District Council's residents. Transport (para 4.83 -4.87, 4.90 - 4.91 Policy T1 &T2) The key concern for Harlow is the need to provide the infrastructure to support the strategic housing sites and the importance of building a new junction on the M11 (J7a) to support the housing, employment and the regeneration of Harlow. The recognition given for the requirement to safeguard land, in order to deliver J7a, and for the improvements to the local highway network and sustainable transport routes is supported. North Weald Bassett (Para 5.103- 5.123, Policy P6) There is concern that the potential cumulative impact of housing developments being proposed in the North Weald Bassett area on the A414 and Junction 7 is not clear. The uncertainty is increased as the employment land has no indication of the number or type of jobs being proposed. Harlow requests that EFDC continue to work with Harlow Council so that more clarity is given in order to avoid competition with Harlow's Enterprise Zone. Harlow Council looks forward to continuing working with EFDC, under the Duty to Cooperate, to achieve a shared vision and deliver sustainable, affordable housing on strategic housing sites which are supported by appropriate infrastructure to the benefit of the residents in both districts.