

Epping Forest District Local Plan  
Consultation – Submission Version 2017

Representations



**Boyer**

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## 1. INTRODUCTION

- 1.1 This representation has been prepared on behalf of CEG and Hallam Land Management Ltd in response to the Regulation 19 consultation on the Epping Forest District Local Plan.
- 1.2 Boyer has been appointed by CEG and Hallam Land Management Ltd (the promoters) to act on their behalf in respect of their land interest in the north east of the district to the south of the built edge of Harlow. The site has been promoted through the development plan process since 2005, initially through the East of England Regional Spatial Strategy. A site location plan is attached at [Appendix 1](#).
- 1.3 The site, referred to in the Regulation 19 consultation version of the Local Plan as Latton Priory, is proposed for allocation through draft Policy SP5: Garden Town Communities. This is considered in further detail later in the representation. We very much support this allocation.
- 1.4 The Latton Priory site, which has been promoted for a number of years, would involve a mix of land uses, and could potentially deliver up to 2,500 homes and 12-15 hectares of employment land for B-class uses.
- 1.5 This representation considers the changes which could be made to improve the Plan in terms of its soundness and justification including an extended development area at the Latton Priory allocation. It builds on the representation previously submitted in December 2016 in response to the Council's Regulation 18 consultation on the Draft Local Plan.
- 1.6 Since then, Epping Forest District, Harlow District and East Hertfordshire District Councils have been given Garden Town status for the Harlow and Gilston Garden Town, as confirmed by the former Department for Communities and Local Government (DCLG) in January 2017. The Pre-Submission Local Plan has therefore been updated accordingly to reflect this new status and further discussion on the Garden Town designation is provided in our response to Policies SP4 and SP5.
- 1.7 CEG and Hallam Land Management Ltd both have proven track records in the delivery of sustainable new developments of the highest quality throughout the United Kingdom. Both are committed to the delivery of sustainable new communities. A full consultant team has been appointed to progress technical and environmental issues relating to the future development of the Latton Priory site. It is considered that this evidence base will assist the Council in demonstrating how the Latton Priory site will meet their Objectively Assessed Housing Needs during the plan period.
- 1.8 CEG and Hallam Land Management Ltd would like to continue working with the District Council, County Council, key stakeholders and the local community to prepare detailed proposals for the site. Our clients are committed to constructive engagement throughout the promotion of the development.

## 2. PLANNING POLICY CONTEXT

- 2.1 This section provides a brief review of the approach which local planning authorities are required to take in preparing Local Plans for their areas, with particular reference to identifying and planning for housing requirements, as well as Green Belt considerations.
- 2.2 Published in March 2012, the National Planning Policy Framework (NPPF) provides the overarching Government policy document in relation to planning.
- 2.3 The NPPF requires Local Plans to be “prepared with the objective of contributing to the achievement of sustainable development” (paragraph 151). As such paragraph 154 states that Local Plans “should address the spatial implications of economic, social and environmental change”. They should set out “the opportunities for development and clear policies on what will or will not be permitted and where”.

### Plan Making

- 2.4 In light of the above, these representations will address the draft Local Plan against the provisions of the NPPF. Paragraph 14 states that at the heart of the NPPF is a “*presumption in favour of sustainable development*”, which should be seen as a golden thread running through both plan-making and decision-taking. For plan making this means that:
- Local planning authorities should positively seek opportunities to meet the development needs of their area;
  - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  - Specific policies in this Framework indicate development should be restricted.
- 2.5 Paragraph 156 of the NPPF states that local planning authorities should set out the strategic priorities for the area in the Local Plan.
- 2.6 Paragraph 182 explains that the Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic properties; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

### **Delivering a Wide Choice of High Quality Homes**

2.7 With regards to delivering a wide choice of homes and maintaining a supply of housing land, paragraph 47 states that to boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- Set out their own approach to housing density to reflect local circumstances.

2.8 Supporting text at paragraph 47 (footnote 11) states that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

2.9 Furthermore, footnote 12 states that to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

### 3. LOCAL PLAN VISION AND OBJECTIVES

- 3.1 In setting the strategic context for this Plan, emphasis is placed on the Council working with its partner authorities to deliver the vision for the London Stansted Cambridge Corridor (LSCC) Core Area. We support this principle and the key elements of the vision which we see as:
- Complementing and supporting the economic performance of the corridor;
  - Delivering housing;
  - Capitalising on existing economic sectors and promoting growth of expanding industries;
  - Protecting and enhancing the natural environment;
  - Working with partners to invest in major infrastructure; and
  - The regeneration of existing urban areas.
- 3.2 We particularly welcome the emphasis given to the development and sustainable growth of Greater Harlow in the context of the LSCC Core Area vision.
- 3.3 We also support the Vision for the District set out on page 19 of the Plan, in particular that “significant residential development will be located around Harlow to support the economic regeneration of the town”.
- 3.4 We support the Local Plan Objectives on page 20 as an important set of principles to guide the specific policies and proposals of the Plan.

## **4. SPATIAL DEVELOPMENT STRATEGY 2011-2033 (POLICY SP2)**

### **Housing Need and Supply**

- 4.1 It is well established that Local Plans should first establish Objectively Assessed Need (OAN) for housing and then, as a separate process, determine the extent to which that need can be met, consistent with the policies set out within the NPPF. Paragraph 47 of the NPPF is clear that the aim should be to meet the full OAN as far as is consistent with the NPPF policies.
- 4.2 As with the Regulation 18 Draft Local Plan however, there is no clear separation in the Pre-Submission Local Plan between the OAN and the Authorities' capability to meet it. In the interests of soundness they should be dealt with under separate headings, for both the HMA as a whole and for Epping Forest in particular. We consider these two processes below.

### **Objectively Assessed Need (OAN)**

- 4.3 Epping Forest District lies within the West Essex and East Hertfordshire Housing Market Area (HMA) along with Harlow, East Hertfordshire and Uttlesford District Councils. The original Strategic Housing Market Assessment (SHMA) was published in 2015 and identified a need for 46,100 homes across the HMA. The individual OAN for Epping Forest was identified as 11,300 new homes over the Local Plan period (2011-2033).
- 4.4 Since the completion of the 2015 SHMA, revised household and population projections have been published, the most recent being:
- CLG 2014-based household projections, published in July 2016;
  - ONS population estimates up to mid-2016, the most recent data published in June 2017; and
  - Greater London Authority (GLA) 2016-based household projections, published in July 2017.
- 4.5 The SHMA consultants, Opinion Research Services (ORS), have estimated that the revised household and population projections above results in an increase in OAN to 51,700 for the combined HMA authorities, an increase of some 5,600 homes. Their resulting report: 'West Essex and East Hertfordshire Strategic Housing Market Assessment: Establishing the Full Objectively Assessed Need' (July 2017), also estimates that the OAN for Epping Forest District increases to 12,573 dwellings (572dpa), as accepted in paragraph 2.43 of the Plan.
- 4.6 The Pre-Submission Plan, as with the previous Regulation 18 Draft Local Plan, proposes a constrained housing target of 11,400 homes, representing a shortfall of some 1,173 homes compared to its OAN, as discussed further below.

- 4.7 In September 2017 the Government released its consultation on the long awaited standardised methodology for calculating housing need. The idea of a standardised methodology was first suggested by the Local Plans Expert Group in early 2016. It was supported by the Government in the Housing White Paper 'Fixing our Broken Housing Market' in February 2017.
- 4.8 The draft standard methodology, as currently proposed, would result in a substantial increase in the annual housing requirement for all four HMA authorities, as illustrated in the table below. In particular, the annual requirement for Epping Forest would increase by 351 dpa, which would equate to an additional need of 7,722 homes over the plan period compared to the OAN identified in the 2017 SHMA Update.

	SHMA Update (July 2017) (2011-2033)	Proposed Standard Methodology (2016-2026)	Difference
East Herts	836 dpa	1,111 dpa	+275 dpa
Epping Forest	572 dpa	923 dpa	+351 dpa
Harlow	337 dpa	466 dpa	+129 dpa
Uttlesford	606 dpa	740 dpa	+134 dpa
Total	2,351 dpa	3,240 dpa	+889 dpa

- 4.9 The Government has indicated that, if it is taken forward, the new standard methodology would apply to all Local Plans submitted for examination after 31 March 2018. Epping Forest intends to submit the Plan to the Secretary of State before this date. From a political perspective, it is the Council clear intention to submit the Plan for examination before 31 March 2018 to avoid a potential increase in its housing requirement. However, neither the Pre-Submission Plan nor evidence base makes any reference to the standard methodology itself. The Council's position on the standard methodology from a technical perspective is therefore unknown. This should be clarified as part of the examination process. The Council may not be obliged to adopt the figures from the standardised methodology but it needs to state why it is not doing so and the technical justification for this course of action.

#### **Capability to Meet the OAN**

- 4.10 To assess the sustainability of strategic spatial options for meeting the overall OAN within the HMA, the four west Essex/East Hertfordshire authorities, through the Co-op Member Board, jointly commissioned a 'Spatial Optioneering' (Spatial Options) study. We understand that this is not a single report or assessment as such but rather a process with three main components, with the overall aim of testing options for distributing different levels of growth across the HMA i.e.:
- Identifying and assessing options for the spatial distribution of OAN across the authorities

- Sustainability Appraisal of these options (carried out by AECOM)
  - A Memorandum of Understanding (MoU) between the authorities setting out a high level agreement as to how OAN should be distributed across the HMA
- 4.11 This approach to joint working within the Housing Market Area is supported and provides a better co-ordinated and more effective approach to plan making within the area.
- 4.12 The process and output from the Spatial Options Study is reported in the previous Housing Background Paper (October 2016) and signed MoU (March 2017). We understand that the Study assessed six options that represented different levels of housing growth and its spatial distribution across the HMA, based in part on the previous SHMA Update published in August 2016. This resulted in a preferred Spatial Option, which proposed that a maximum of 51,100 homes be provided within the HMA area based on the latest demographic data available at the time, the level of infrastructure constraints and environmental and policy designations. It was agreed by the authorities that 11,400 homes would be provided in Epping Forest District.
- 4.13 As noted in paragraph 2.56 of the Draft Local Plan however, the work that underpinned the development of the MoU distribution focussed on the housing projections set out in the 2015 SHMA which were lower than the OAN identified in the July 2017 update. The Council accepts in paragraph 2.6 of the Housing Implementation Strategy (December 2017) that the July 2017 update figure of 12,573 represents that latest OAN for the District, however it is apparent from the Pre-Submission Plan and evidence base that no work has been undertaken to update the previously agreed spatial distribution across the HMA despite an increase in OAN for three of the four authorities involved, and across the HMA as a whole, compared to the distribution previously agreed in the MoU, as illustrated in the table overleaf.
- 4.14 The MoU states at paragraph A4.5 of Appendix 4 that the preferred spatial option “*is based broadly upon each local authority meeting its OAN within its own boundaries*”. That is not correct however as the 51,100 dwellings agreed in the MoU (and, of these, the 11,400 dwellings proposed for Epping Forest) are below the up-to-date OAN figures of 51,710 for the HMA and 12,573 for Epping Forest (and were also below the latest OAN figures published at the time the MoU was signed). We suggest that this indicates a need to update the MoU and spatial distribution in light of the most up-to-date evidence of housing need (i.e. the July 2017 SHMA Update), to ensure the soundness of the Epping Forest Local Plan, and indeed the emerging Local Plans for all authorities within the HMA.

	Original SHMA (September 2015)	MoU distribution (March 2017)	SHMA Update (July 2017)
East Herts	12,200	18,000	18,396
Epping Forest	8,100	11,400	12,573
Harlow	2,500	9,200	7,409

	Original SHMA (September 2015)	MoU distribution (March 2017)	SHMA Update (July 2017)
Uttlesford	9,700	12,500	13,322
Total	32,500	51,100	51,710

- 4.15 The conclusion that the HMA as a whole and that Epping Forest in particular cannot meet their OAN is an important one, and one which we consider is not given sufficient explanation within the Plan or its evidence base, specifically the Housing Implementation Strategy (December 2017), which states that:

*“2.6 The latest updates suggested a slightly increased OAHN for three of the four local authorities involved. However, as the increase has been largely anticipated and accounted for in the MoU, the overall housing need across the entire HMA is broadly consistent with what has been agreed in the MoU. The Council therefore accepts that the figure stated in the 2017 SHMA update represents the latest OAHN for the District, which is 12,573 new homes for the Plan period.”*

*2.7 As stated in paragraph 47 of the NPPF, local authorities should “...ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...”. The Council is satisfied that the approach set out within the MoU will ensure that the OAHN within the HMA as a whole will be met over the course of the Plan period. As agreed and explained in the MoU, the housing requirement for the Epping Forest District Local Plan is 11,400 dwellings.” (Our emphasis)*

- 4.16 As illustrated in the table above however, the approach set out in the MoU has a shortfall of some 610 dwellings across the HMA as a whole compared to the OAN. The distribution to Epping Forest also falls 1,173 dwellings short of the District's specific OAN. It is not sufficiently clear within the Plan or evidence base why the Council is not proposing to meet this.
- 4.17 It is also noteworthy that East Hertfordshire District Council's Local Plan, which is currently undergoing examination, is planning for a higher number of dwellings (18,681) than the figure allocated to it under the MoU, which is also higher than the OAN identified in the 2017 SHMA Update. The figures agreed within the MoU evidently therefore do not necessarily represent the maximum level of housing development which can be accommodated by each respective authority.
- 4.18 We therefore consider that Epping Forest's capability to meet its OAN warrants particular further scrutiny if the Plan is to be found sound, especially as it appears to be based primarily on a cap for growth at Harlow dictated by highway capacity constraints. We consider this issue further below.

### **The Principle of Major Growth at Harlow**

- 4.19 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.
- 4.20 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.
- 4.21 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.
- 4.22 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.
- 4.23 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 £400million world-leading home for public health science will be fully operational in 2024, with the first staff moving to Harlow in 2021. The provision of new homes and specifically larger, quality housing is a concern in this context.
- 4.24 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.

- 4.25 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.
- 4.26 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.
- 4.27 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.
- 4.28 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.
- 4.29 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?**

- 4.30 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.

- 4.31 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.
- 4.32 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”.
- 4.33 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.
- 4.34 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.
- 4.35 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.

4.36 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.

4.37 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.

4.38 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.

## Housing Supply

- 4.39 Paragraphs 2.59 – 2.63 of the Plan address housing supply. The Plan suggests that the majority of supply in the first five years post-adoption is expected to come from smaller site allocations, as the strategic sites *“will not begin delivering new homes until later in the Local Plan period”*. Paragraph 2.62 also goes on to state that *“the planned Garden Communities will make a significant contribution over the plan period but will not supply much over the first five years of the Plan”*.
- 4.40 It should not be assumed that all strategic sites will make only a limited contribution to completions in the early years of the Plan, and to the Council’s five year housing land supply. Latton Priory in particular due to its single ownership and limited infrastructure requirements (in relation to the other strategic sites) can make a contribution within the five-year period.
- 4.41 Research undertaken by NLP<sup>1</sup> demonstrates that larger sites can deliver more homes per year over a longer time period than smaller sites and, whilst they generally have longer lead-in times, the research is clear that:
- “As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects. (Boyer emphasis)”*
- 4.42 Lead-in times on individual sites will be dependent on a number of factors, including, amongst others, the time taken for the new Local Plan to be adopted (to give developers/landowners sufficient certainty on the principle of development); whether the site is in multiple ownerships (and if so, how many), and the infrastructure needed to support higher levels of development in each respective.
- 4.43 It is important that the housing trajectory in the new Local Plan includes realistic assumptions about the rate at which larger housing sites will deliver to ensure that supply is maintained throughout the plan period. Latton Priory is in single ownership and so is well placed to begin delivering new housing relatively quickly once the Plan is adopted compared to other strategic sites. Latton Priory is less dependent than the other Garden Town Communities at Harlow on strategic infrastructure. With multiple site outlets, direct access to Junction 7 of the M11 and sales rates least likely to be impacted by or to impact on allocations in other locations delivery will be unimpeded. This is an important consideration given that the Council acknowledges that it will not have a 5 year land supply in the early years of the Plan period.

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<sup>1</sup> ‘Start to Finish: How Quickly to Large-Scale Housing Sites Deliver?’ (NLP, 2016)

- 4.44 The Housing Trajectory at Appendix 5 of the Plan suggests that Latton Priory will begin delivering housing in 2021/2022 (the same year as Water Lane Area and East of Harlow). It is unclear from the evidence base how these expected dates/rates of delivery have been devised, and the anticipated trajectory for all three of the Garden Town Communities follows a broadly similar pattern. At East of Harlow however, it is not yet known whether the site masterplan will need to accommodate the relocation of the Princess Alexandra Hospital from its current site in Harlow. Given that Latton Priory is not dependent on such an unknown, and is in single ownership, it is therefore not unreasonable to expect the site to start delivering new housing sooner in the Plan period. This is discussed further later in this representation in response to Policy SP5.
- 4.45 The NLP research also identifies that the average annual build out rate for schemes of 2,000+ dwellings is 161 dwellings. The Housing Trajectory suggests that East of Harlow will deliver 200 dpa from 2022/23 onward and so we would also question how realistic this rate of delivery is given the lack of specific evidence in respect of the Housing Trajectory. Also, the rate of development at the East of Harlow site will be constrained by the existing committed development close to this location and the further development proposed for allocation in the Harlow Local Plan, as the market can only support a limited number of completions within one small geographical area.

### **Employment**

- 4.46 Policy SP2 states that employment needs will be provided for over the plan period 2011-2031 by retaining and enhancing existing employment sites; allocating 23 hectares of new employment land across the District; and promoting new small-scale employment opportunities within mixed-use developments, including at the Garden Town Communities.
- 4.47 Before commenting on the extent of the employment requirement, we note that there is a typographical error in Table 2.5 'Employment Requirements: 2011-2033', as the first two rows of the table are both labelled 'Employment land (B uses) required 2016-2033 for offices', with '2-5ha' recorded for the first line and '14ha' recorded for the second. Based on the conclusions of the West Essex and East Hertfordshire Assessment of Employment Needs (October 2017), it appears that the second line (14ha) should instead relate to 'Employment land (B uses) required 2016-2033 for industrial (manufacturing and logistics)'.
- 4.48 In terms of the level of employment need, the 2017 Assessment of Employment Needs refers to potential for jobs growth of approximately 10,800 within Epping Forest District across the entire 2011-33 plan period, as acknowledged in paragraph 2.51 of the Plan. This equates to an annual job-based requirement of 491 jobs, of which 7,800 are expected to come forwards between 2016 and 2033. The 2017 Assessment of Employment Needs therefore estimates a future sites and premises requirement for Epping Forest District of 2-5ha of office and 14ha of industrial floorspace.
- 4.49 The 2017 Assessment of Employment Needs also identifies the employment needs for the rest of the Functional Economic Market Area (FEMA), namely East Herts, Harlow and Uttlesford. Page (v) of the report however states that:

*“...there remains a small shortfall in forecast jobs to balance the labour market and maintain 2011 commuting rates. It is estimated, in line with the core analysis, without any increase in densities that a further 6,400 sq m of office floorspace and 8,700 sq m of industrial floorspace will be required to accommodate the shortfall. This will require a further 2.8 – 3.8 hectares of land in addition to the requirements set out in figure 5 [Preferred Scenario – Total Estimated Future Sites and Premises Requirements – FEMA 2016-33].*

*“Figure 6 [Total Estimated Future Sites and Premises Requirements 2016-33] sets out the breakdown by district. The unallocated figure will need to be accommodated within the FEMA through agreement between the districts.”*

- 4.50 This is also acknowledged within the Hardisty Jones Employment Review (December 2017), however there does not appear to be any reference within the Pre-Submission Plan or its evidence base confirming whether an agreement has been reached between the FEMA districts as to how this unallocated figure will be distributed. This needs to be confirmed as part of the examination process to ensure that the employment needs of the FEMA are met in full, to ensure the soundness of the Plan. This is particularly important given that the very high occupancy rates in Epping Forest District currently limits the capacity for the market to operate effectively in terms of growth and movement, as identified in section 5.1.4 of the 2017 Employment Review.
- 4.51 The final recommendation of the 2017 Employment Review (p.30) states that: “There is no evidence that [Epping Forest] District currently serves a wider Harlow market area and no evidence emerged from the 2015 or 2017 FEMA studies indicating that there is a need to meet Harlow requirements or serve the Harlow market. There is therefore no clear requirement for the spatial strategy to address this.” We would question the validity of this statement however given the additional unallocated employment floorspace identified above.
- 4.52 The 2017 Employment Review also notes that more than 24.2 ha of employment land have been lost across the District over the last seven years, with a further 11.6 ha identified as being at risk as a result of prior approvals and planning permissions. It is unclear however whether/how the impact of this has been considered in the formulation of the Council's targets for new/enhanced employment space under Policy SP2.
- 4.53 In respect of the spatial distribution of the proposed new employment land allocations, supporting paragraph 2.73 states that:

*“The spatial distribution of the sites has also sought to reflect the employment needs identified across the District, particularly taking into account the need for additional space to serve employment markets in the south of the District, including at Loughton and Waltham Abbey. 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.”*

- 4.54 We question the emphasis that the Plan places on the provision of new employment space in the south of the District and away from Harlow. The 2017 Assessment of Employment Needs notes that an uplift of 2,500 jobs was made at Harlow itself to capture the opportunities within Harlow District itself (given the relocation of PHE and the Enterprise Zone). Outside the administrative boundary of Harlow however, consideration should also be given to the locational advantages of providing additional areas of employment as part of the Garden Town Communities around the edge of Harlow, and in particular Latton Priory, given the site's proximity to Junction 7 of the M11.
- 4.55 The Plan also states that a significant proportion of new floorspace is capable of coming forward through the regeneration of existing employment sites (paragraph 2.75 refers). We question the significant emphasis that the Plan places on meeting employment requirements through the enhancement of existing sites given the inherent difficulties with this, particularly in light of the very high levels of occupancy in the District.
- 4.56 In light of the above we would therefore question why the third principle of providing for employment needs (i.e. promoting new small-scale employment opportunities within mixed-use developments, including at the Garden Town Communities) only refers to "small-scale" employment opportunities, whereas sites such as Latton Priory provide an opportunity for larger scale employment opportunities as well. Indeed, maximising the amount of employment floorspace at the Garden Town Communities where appropriate would align with the garden suburb philosophy which seeks to address daily demands within the development, whereas the current "small scale" approach appears to contradict this (and in the case of Latton Priory refers only to an existing employment area which may not result in a net gain in jobs).

## 5. GARDEN TOWN COMMUNITIES (POLICIES SP4 AND SP5)

### HARLOW AND GILSTON GARDEN TOWN

- 5.1 As highlighted earlier in this representation, Epping Forest District Council, Harlow Council and East Hertfordshire District Council are working in partnership together with Hertfordshire County Council, Essex County Council, Hertfordshire Local Enterprise Partnership, South East Local Enterprise Partnership, land owners and promoters to bring forward transformational growth in the form of Harlow and Gilston Garden Town.
- 5.2 On 2 January 2017 the Government announced its support for the Expression of Interest submitted to the locally-led Garden Towns prospectus on behalf of the Councils. The Councils have produced a shared vision and set of objectives, recognising that areas in and around Harlow present a number of opportunities to deliver growth of considerable scale and significance. Such growth is key not only to meet growing pressures of housing and infrastructure need locally, but also in delivering broader regeneration and change for Harlow.
- 5.3 The Garden Town lies in the core area of the 'London Stansted Cambridge Corridor' (LSCC) - one of the most important and fastest growing economic regions in the country.
- 5.4 The Council indicates that the Garden Town represents a major opportunity to accommodate around 16,000 homes up to 2033 between the global centres of London and Cambridge. The Garden Town will provide a mix of development, including employment, schools and community facilities.
- 5.5 Harlow and Gilston Garden Town comprises four new Garden Town Communities:
- East of Harlow;
  - Latton Priory;
  - Water Lane Area ; and
  - Gilston.
- 5.6 Three of these Communities (East Harlow, Latton Priory and Water Lane Area) lie within or partially within Epping Forest District and so are central to the spatial strategy for the Pre-Submission Local Plan.

### OVERVIEW

- 5.7 Policies SP4 and SP5 relate to the new Garden Town Communities within Epping Forest District. Comments on the individual policies are set out in turn below.
- 5.8 There is notable repetition and overlap between the sections of the Plan that deal with Policies SP4 and SP5, both in the policy wording and supporting text. Each policy should have distinct subject matter and content, but the current wording is confusing and imprecise.

- 5.9 In the interests of soundness the policies should be restructured. Both policies could be edited down significantly if repetition and overlap is cut out. This is important to ensure the policies are effective.
- 5.10 In this respect, Policy SP4 should deal more clearly with (and be confined to) the key broad principles that apply to the three Garden Town Communities collectively. Policy SP5 should then deal with the site-specific requirements for each site, avoiding repetition of the general principles for all Garden Town Communities covered in Policy SP4.
- 5.11 Furthermore, although each policy is preceded by supporting text, this often merely pre-states the policy requirements which are then repeated in the main policy wording. The role of supporting text should be to elaborate and justify key policy principles rather than simply state them in advance of the policy.

#### **POLICY SP4 – DEVELOPMENT AND DELIVERY OF GARDEN COMMUNITIES**

- 5.12 **SP4(A)** allocates Latton Priory, the Water Lane Area and East of Harlow as new Garden Town Communities as part of the Harlow and Gilston Garden Town. We support the allocation of all three sites and their definition as Garden Town Communities although the capacity to support a higher level of provision, particularly at Latton Priory, should be considered.
- 5.13 **SP4(B)** relates to comprehensive planning and infrastructure planning. We support the principles of holistic and comprehensive planning in accordance with the Infrastructure Delivery Plan (IDP). As the IDP is a 'live' document that will be refined and updated during the life of the Plan it should not 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.
- 5.14 **SP4(C)(i)** relates to public/private sector collaboration. We strongly support this principle and that of future stewardship, management, maintenance and renewal of community infrastructure and assets.
- 5.15 **SP4(C)(ii)** refers to the community engagement strategy. We strongly support this principle and the promoters are committed to the development of such a strategy as part of the emerging masterplan for Latton Priory.
- 5.16 **SP4(C)(iii)** refers to the inclusion of opportunities for community-led housing development. We support this in principle but if it is to be a policy requirement then what is meant by 'community-led housing development' needs to be clearly defined within the policy itself and appropriate evidence provided to justify this requirement.

- 5.17 **SP4(C)(iv)** refers to governance and stewardship. We support and commit to this principle but the policy wording would benefit from further clarification to understand what is anticipated in this regard. Whilst we are happy to engage with Officers in respect of matters of governance and stewardship we do not consider that this should be an obligation on developers to fund.
- 5.18 **SP4(C)(v) to SP4(C)(viii)** relate to strategic planning and the design process. We support the sequential approach to the planning and design process and the principle of strategic masterplans and design codes.
- 5.19 We note however that there appear to be many stages to the design process defined for the Garden Town Communities, beginning with the TCPA Garden City Principles and including the preparation of a 'Spatial Vision and Design Charter Framework' followed by the 'Design Charter' (paragraph 2.114 refers). This then informs the strategic masterplans and the preparation of design codes. In addition, the Council proposes to establish a Quality Review Panel which it proposes will be involved at various stages. It will be important to set a clear and efficient timescale to these processes so they assist rather than complicate delivery and each process must be pragmatic and viable. These stages should overlap rather than run sequentially over a long time span.
- 5.20 We are supportive of the TCPA Garden City principles. They offer a distillation of the key elements that have made the Garden City model of development so successful. As a set of high-level principles they are considered to offer sufficient flexibility to enable individual site circumstances, constraints and viability considerations to be taken into account.
- 5.21 As with Policy SP3, we support the principle of the preparation of strategic masterplans to be endorsed by the Council, and support the principle of compliance with the strategic masterplan when preparing and submitting planning applications at the Garden Town Communities.
- 5.22 We also support the preparation of design codes in principle. For the reasons discussed in response to Policy SP3 however, it is not considered necessary for design codes to be finalised prior to the determination of outline planning applications, particularly where sites come forward as a single application. Instead design codes can be introduced as an intermediate stage before submission of reserved matters, to be controlled by condition, to speed up delivery and reduce lead-in times.
- 5.23 We also support the intention to set up a Quality Review Panel provided its role, remit and powers are clearly defined. We hope that this will ensure that the review process is efficient and avoids potential conflicts and delays associated with considerably long and complex reviews of future masterplans.
- 5.24 **SP4(C)(ix)** relates to the timing and delivery of infrastructure. We support this principle and the acknowledgement of viability considerations as a determining factor in the timing of infrastructure provision.

- 5.25 **SP4(C)(x)** relates to balanced and inclusive communities, and also makes reference to provision for self- and custom-built homes. Whilst we are happy to incorporate an element of self and custom built homes at Latton Priory to support this aspiration we would recommend that this is limited to no more than 1% of the proposed development. In our experience self and custom build houses are unlikely to be taken up in significant numbers on large development sites as they are generally better suited to small scale bespoke sites.
- 5.26 Consideration should also be given to the fact that self builds will take significantly longer to deliver homes than homes built by national house builders. In addition they are also likely to cost more due to the plot sales being required to contribute towards infrastructure and individuals unlikely to be able to secure the economies of scale on construction costs achieved by national house builders.
- 5.27 **SP4(C)(xi)** relates to small-scale employment generating uses. We would query this reference and would like to understand more clearly how the Council has determined the scale of employment to be provided and whether strategic employment allocations are being regarded as a separate issue from the Garden Town Communities. We would assert that, given the size and scale of the Harlow and Gilston Garden Town, the promotion and allocation of large scale employment allocations is vital to delivering sustainable communities. We have considered this point further below in commenting on the Latton Priory allocation under Policy SP5.1.
- 5.28 **SP4(C)(xii)** seeks to create a modal shift in travel patterns. We are supportive of this aspiration and have previously highlighted through our representations the potential for Latton Priory to contribute towards the improvement of connections to the town centre, railway station and employment sites. Our masterplan for Latton Priory will incorporate a comprehensive network of walking and cycling routes which will provide high quality environments to encourage the safe movement of both pedestrians and cyclists. Furthermore, we also recognise that the site could play a significant role in the delivery of a north-south sustainable transport corridor which would assist in contributing towards this modal shift to sustainable modes of transport.
- 5.29 **SP4(C)(xiii)** relates to sustainable transport and partly appears to duplicate SP4(C)(xii) above. The concept of the Sustainable Transport Corridors is laudable but needs better definition in terms of scope, timing and funding before it can be firmly tied to the garden town proposals. Paragraph 2.117 refers to the preparation of a 'Sustainable Transport Corridor Study' which will presumably provide further clarification and we would request that this Study be discussed with developers through the Epping Forest District Developers Forum.
- 5.30 **SP4(C)(xiv) to SP4(C)(xv)** relate to community infrastructure, parking approaches and environmental/landscape character. We support these principles. We would also welcome the opportunity to engage with the Council regarding the preparation of the proposed 'Garden Town Community parking approaches and standards', in order to ensure sufficient provision is delivered as part of the masterplanning process for the site.

- 5.31 **SP4(C)(xvii)** relates to sustainable design approaches. Whilst the “highest standards of energy efficiency and innovation in technology” is a positive aspiration, it is imprecise as a policy requirement and may not necessarily be viable or achievable. The policy requirement must be clarified for the policy to be effective.
- 5.32 **SP4(C)(xviii)** seeks to ensure “that appropriate measures are put in place to equalise and apportion the cost of shared infrastructure and associated land contributions”. We consider that this reference needs further clarification to explicitly state what measures the EFDC are seeking to implement and how these will equalise costs and land contributions. Without such clarification we cannot comment on the appropriateness or potential impacts of such a measure. The Council will, in particular, need to address how the land and build costs of the proposed secondary schools are to be apportioned between developers and across local authority boundaries.
- 5.33 It should be noted that the term ‘equalisation’ has a limited meaning and therefore application. It will not necessarily be possible to achieve equalisation across different sites. At present Latton Priory is capable of being delivered without any third party land. In the event third party land becomes included within the proposed allocation then there is a risk that this could delay the delivery of the primary site.

#### **POLICY SP5 – GARDEN TOWN COMMUNITIES**

- 5.34 **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.
- 5.35 **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.
- 5.36 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).

- 5.37 **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).
- 5.38 **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.
- 5.39 **SP5(E)** requires development proposals to “*reflect and demonstrate that the Place Shaping and Garden Town principles set out in Policy SP3 and SP4 have been adhered to*”. This 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**

- 5.40 **SP5.1** relates specifically to Latton Priory:
- 5.41 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
- 5.42 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.”*

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

*SP5 F(i) Site Capacity*

- 5.44 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.
- 5.45 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*

- 5.46 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.
- 5.47 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.”*
- 5.48 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.
- 5.49 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.

- 5.50 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.
- 5.51 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.
- 5.52 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.
- 5.53 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.
- 5.54 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.”*

- 5.55 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.
- 5.56 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.
- 5.57 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.
- 5.58 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

- 5.59 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.
- 5.60 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

- 5.61 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.
- 5.62 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.

- 5.63 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.
- 5.64 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.
- 5.65 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).
- 5.66 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.
- 5.67 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).
- 5.68 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.
- 5.69 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.
- 5.70 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”*.

- 5.71 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.
- 5.72 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.
- 5.73 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).
- 5.74 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.
- 5.75 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.
- 5.76 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.
- 5.77 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.

5.78 **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***

5.79 **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.

5.80 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.

5.81 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.

5.82 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.

- 5.83 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.
- 5.84 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
- 5.85 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***

- 5.86 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.
- 5.87 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.
- 5.88 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 1<sup>st</sup> Green Belt Purpose "*to check the unrestricted sprawl of large built up areas*". The assessment against the 2<sup>nd</sup> and 4<sup>th</sup> purposes for all three parcels is "no contribution" and only a moderate contribution is indicated for the 3<sup>rd</sup> purpose.

- 5.89 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.
- 5.90 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 1<sup>st</sup> Green Belt purpose.
- 5.91 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**

- 5.92 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)

- 5.93 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**

- 5.94 We support the requirement within sub paragraph F (iv) to provide strategic green infrastructure at the site.
- 5.95 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.
- 5.96 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.
- 5.97 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

- 5.98 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

- 5.99 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

- 5.100 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

- 5.101 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

- 5.102 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

- 5.103 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”*

5.104 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.

5.105 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.

5.106 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.

5.107 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.

5.108 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***

5.109 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.

5.110 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.

5.111 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.

5.112 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***

5.113 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

5.114 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.

5.115 Each point of access is discussed below:

5.116 **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.

5.117 **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.

5.118 **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.

5.119 **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.

5.120 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.

5.121 The routes described above could also deliver off street cycle routes. The following shared pedestrian/cycle footpaths will be considered:

5.122 **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.

5.123 **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.

5.124 **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.

5.125 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***

5.126 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***

5.127 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.'*

5.128 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.'*

5.129 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.'*

5.130 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.

5.131 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*

5.132 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***

5.133 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.

5.134 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.

5.135 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.

5.136 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.

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

5.138 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.

5.139 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.

- 5.140 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.
- 5.141 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.
- 5.142 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.
- 5.143 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***

- 5.144 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.
- 5.145 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.
- 5.146 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.
- 5.147 The off-site network will include a high quality links into Harlow town centre, including the train station to improve integration and co-existence.
- 5.148 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.
- 5.149 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.

5.150 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

5.151 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.

5.152 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.

5.153 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.

5.154 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

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.

5.155 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.”*

5.156 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**)

5.157 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**

5.158 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.

5.159 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.

5.160 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.

5.161 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**

5.162 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.*

5.163 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**”*

5.164 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.*

5.165 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**

5.166 This has a number of heritage and landscape constraints. Part of this allocation lies within the River Sort 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).

5.167 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"*

5.168 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.

5.169 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.

## 6. COMMENTS ON OTHER STRATEGIC POLICIES

### Policy SP3 – Place Shaping

- 6.1 We support the objectives of this policy and most of its requirements.
- 6.2 We also support the amendment made to this policy since the Regulation 18 consultation to acknowledge that the relevance of each place making principle to particular development sites will vary dependent on their scale. We consider however that this could be clarified further by amending the first paragraph of the Policy as follows (new text underlined):
- H. Strategic Masterplans and development proposals must reflect and demonstrate that the following place shaping principles have been adhered to where applicable with respect to the scale of development proposed...*
- 6.3 This point is important as it will not be possible for all smaller sites and allocations to meet the criteria set out. For example, the strategic allocations should lend themselves to providing a mix of land uses, but the smaller residential sites allocated in Chapter 5 may not be able to meet these criteria. For example, a small residential development site is unlikely to provide, “*a robust range of employment opportunities with a variety of jobs within easy commuting distance of jobs*”.
- 6.4 We would suggest that place shaping principles be devised, discussed and agreed with developers, specifically for the strategic sites, through the Developer Forum and masterplanning processes. These principles can then feed into the production of the Strategic Masterplans, where required under Policy SP4.
- 6.5 In this regard, we support the Council’s statement at paragraph 2.94 that the production of Strategic Masterplans “*will ensure that development proposals are ‘front-loaded’ and where possible accelerated*”.
- 6.6 Pursuant to this however, paragraph 2.98 also suggests that the Council will require Design Codes to be produced in accordance with the general principle established via Strategic Masterplans, *before* planning applications are submitted for individual sites. We question the need for a Design Code to be prepared before an application is submitted, unless a site does not come forward under a single outline application. Where that is the case however, a Design Code could be secured via condition and agreed prior to any application for reserved matters approval being submitted, in order to accelerate the delivery of sites. It appears superfluous to require both a Strategic Masterplan and Design Code to be prepared, submitted and agreed in turn, before the Council will entertain a planning application, particularly where sites are in single ownership.
- 6.7 We also note that the timing referred to in paragraph 2.98 does not directly reflect Figure 2.1 (‘Planning process for Strategic Masterplans’), which shows the preparation of Design Codes as taking place simultaneously with an Outline Planning Application.

### **Policy SP 6 – Green Belt and District Open Land**

- 6.8 Over 92% of Epping Forest is designated as Green Belt, and it has been a long held view of the Council that a review of the Green Belt boundary would be necessary in order to accommodate long term development needs.
- 6.9 We support the Council's policies and proposals with regard to the Green Belt and, in particular, the principle of altering the Green Belt boundary to allow the allocation of strategic sites around Harlow.
- 6.10 As stated in paragraph 2.135 of the Plan, the NPPF requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary. It is important to recognise that the exceptional circumstances are most clearly evident and compelling where the level of need for development is acute.
- 6.11 We support the justification for altering the Green Belt boundaries as summarised in paragraph 2.136 of the Plan. We consider that the overall need for growth and regeneration at Harlow also constitutes exceptional circumstances that justify Green Belt alteration. The needs of Harlow are clearly set out in paragraph 2.140 of the Plan and we think it would be helpful to define these needs as exceptional circumstances.
- 6.12 Map 2.5 of the Plan illustrates the Green Belt Boundary Alterations, with the detailed boundaries and inset settlements defined in Chapter 5 of the Plan and shown on the policies map. For the reasons discussed in Section 5 in respect of Policy SP5, we consider that the Green Belt boundary adjoining Latton Priory should be moved further south, as the proposed Green Belt boundary does not align with 1) the boundary of the residential site allocation or 2) with a permanent recognisable boundary as required by paragraph 85 of the NPPF.
- 6.13 We question the appropriateness of developing on Green Open Spaces within existing settlements and note in particular the proposals in this respect for Loughton. The proposed Garden Town Communities at Harlow and Latton Priory in particular, provide opportunities to increase housing capacity overall within the District and remove the need for the development of green spaces in the Epping Forest main settlements.

### **Policy SP 7 – The Natural Environment, Landscape Character and Green and Blue Infrastructure**

- 6.14 We very much support the objectives of this policy. Our proposals for Latton Priory have sought to make a major contribution to the comprehensive network of green corridors and places that the Policy refers to.
- 6.15 We particularly support sub paragraphs D and E of the Policy including the expectation that all development proposals contribute towards the delivery of new green infrastructure which develops and enhances a network of multi-functional green and blue assets. Extensive areas of land are to be set aside at Latton Priory for this purpose.

- 6.16 As stated in Section 5 above, our full proposals for the full allocation of up to 2,500 dwellings at Latton Priory is capable of delivering in the region of 150 acres of new accessible green space, incorporating an extension to the Southern Harlow green wedge, parks, allotments, sports facilities, play and recreational facilities.

## 7. COMMENTS ON OTHER POLICIES

### Policy H1 – Housing Mix and Accommodation Types

- 7.1 We generally support the principles of this policy and the fact that it provides important criteria to guide the consideration of such matters in development proposals, rather than prescriptive or inflexible specific requirements.
- 7.2 Part A(v) states that development will be permitted where the mix of new homes “provides for all new homes to be accessible and adaptable as defined by the Building Regulations in effect at the time of the application”.
- 7.3 This appears to be a reference to optional standard M4(2) of the Building Regulations which relates to accessibility, as this standard can only be used by a LPA where it has been adopted as a policy in the local plan. In order to adopt this standard however the Council must justify this as part of the Examination using the evidence requirements set out in the Planning Practice Guidance (PPG). For accessible and adaptable homes the LPA must show that there is a need for such homes and that the adoption of these targets will not, when considered alongside all other costs affecting development, make a scheme unviable.
- 7.4 The Council’s justification for adopting this standard is set out in supporting paragraph 3.4, however this make no specific reference to viability and so this must be justified through the examination process. Without such justification there is a risk this element of Policy H1 could be considered unsound.
- 7.5 It would also be useful for Policy H1 to make specific reference to optional standard M4(2) of the Building Regulations in the interests of clarity and transparency.

### Policy H2 – Affordable Housing

- 7.6 We generally support the Plan’s approach to the provision of affordable housing.
- 7.7 Our aim is to make a policy compliant provision of affordable homes at Latton Priory and to work with the Council to ensure delivery. We welcome the Council’s approach to viability considerations within the Policy.

### Policy E1 – Employment Sites

- 7.8 As stated in Section 5 above, we would like to see Policy E1 (alongside Policies SP4 and SP5), give greater recognition and priority to the provision of new accessible and highly marketable employment land as part of the strategic allocations around Harlow, particularly at locations with the best access to the motorway network such as land close to M11 junction 7.
- 7.9 Paragraph 3.45 of the Plan states that:

*“Given the limited supply of readily available employment sites within current policy constraints, there is scope to consider the renewal or intensification of some existing*

*employment sites, including those within the Council's ownership, in order to maximise their potential.” (Boyer emphasis)*

- 7.10 The reference within the text to current policy constraints does not link with the approach taken elsewhere in the plan in terms of Green Belt release and the particular policy constraints which can be overcome. Whilst the renewal and/or intensification of existing employment sites (where possible) is a positive and important policy objective, the Council's proposed approach in Policy E1 does not currently appear to take into account the contribution that new strategic allocations can also make to the supply of additional employment floorspace.
- 7.11 Collectively, Policies SP4, SP5 and E1 therefore need to set out clear requirements for the required quantity of employment land, spatial priorities for its location and specific allocations at strategic sites.

#### **Policy T1 – Sustainable Transport Choices**

- 7.12 Policy SP5 ('Garden Town Communities') states that development at Latton Priory will be required to include, inter alia *“xii) Highway and transport improvements including to the north-south sustainable transport corridor...”*. Paragraphs 3.81 – 3.94 and Policy T1 fall under a heading of 'Sustainable Transport Corridors', however no further specific reference is made to any 'sustainable transport corridors' in this part of the Plan.
- 7.13 It is therefore unclear what is meant / required in terms of sustainable transport corridors for the Garden Town Communities. Policy T1 sets out the Council's proposed approach in respect of sustainable transport choices, and so we consider that this policy and its supporting text should be modified to provide specific information on the sustainable transport corridors, and any specific policy requirements in respect thereof, in the interests of soundness.

#### **Policy DM 5 – Green and Blue Infrastructure**

- 7.14 We support the aims of this policy. In particular, we recognise and endorse the requirement for the Garden Town Communities to provide a full concept plan of proposed green infrastructure that incorporates existing features on the site and its links to the wider landscape and townscape. This is a matter that we consider should be addressed through the Developer Forum process.

#### **Policy DM 7 – Heritage Assets**

- 7.15 We generally support the aims of this policy. In the context of strategic sites, it will be necessary to consider the requirement to protect heritage assets as part of the planning balance in relation to the overall merits of and need of the development.

**Policy DM 20 – Low Carbon and Renewable Energy**

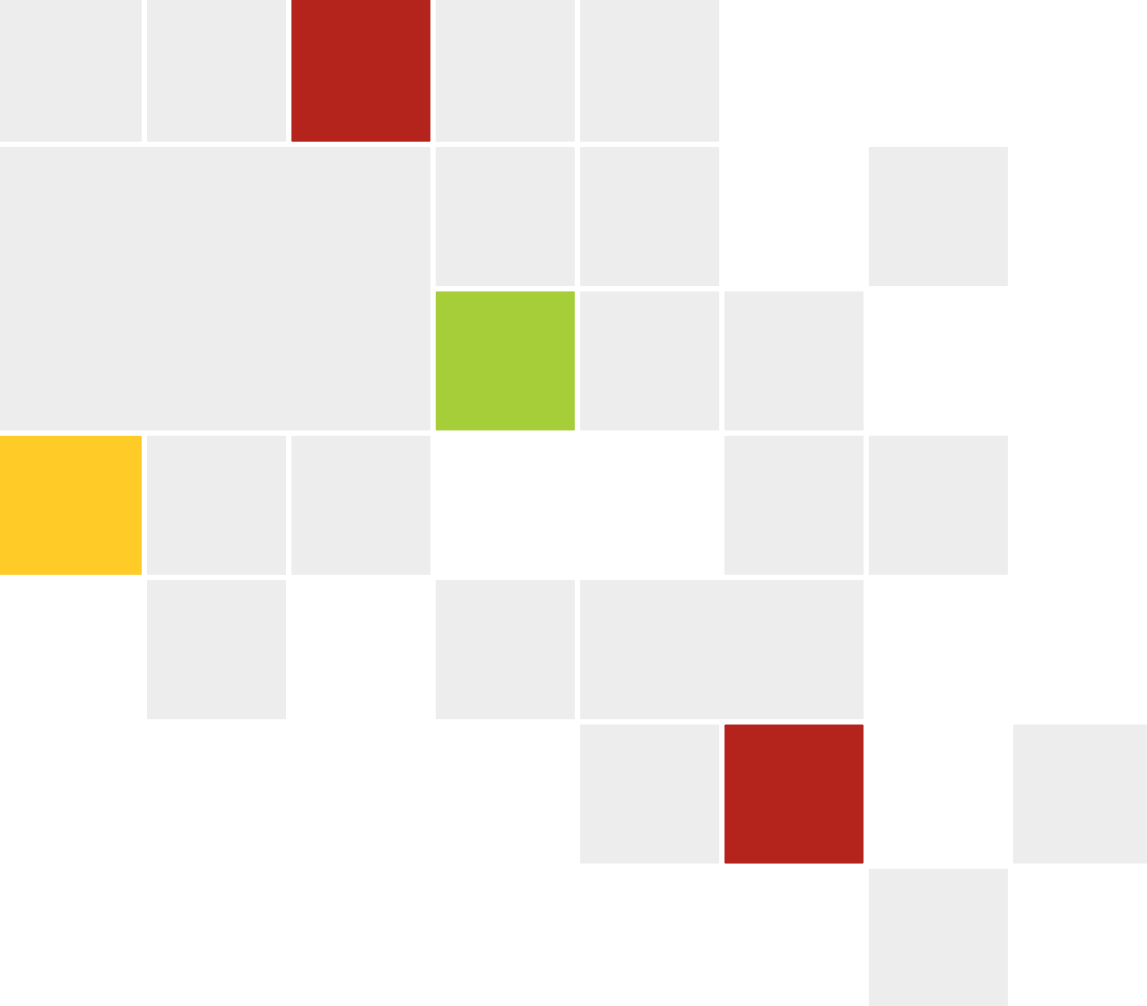
- 7.16 We support the aims of this Policy. We also welcome the additional flexibility in terms of requirements and solutions to achieve them, in the light of continuing changes in low carbon and renewable energy technology, particularly in respect of the requirement in sub paragraph D regarding District heating.

## 8. SUMMARY AND CONCLUSIONS

- 8.1 These representations have been prepared by Boyer on behalf of CEG and Hallam Land Management Ltd in response to the Epping Forest Pre-Submission Local Plan.
- 8.2 Our clients are broadly supportive of the Local Plan and its spatial strategy.
- 8.3 In summary, the submissions are:
- We support the vision and objectives of the Plan.
  - The strategy to locate major development adjoining the Harlow urban area is supported.
  - Further justification is required as to why Epping Forest is not proposing to meet its full OAN, particularly given that an updated MoU has not been prepared to reflect the latest SHMA Update and that additional capacity is available at sustainable allocations, such as Latton Priory
  - We suggest that the proposed capacity limit of 16,100 dwellings at Harlow, based on transport infrastructure requirements, be reviewed to ensure that the growth and regeneration objectives for Harlow are not limited and other settlements in the Plan area are protected.
  - We support the proposed strategic allocations at Harlow in the form of the new Garden Town Communities and in particular the allocation of Latton Priory, although the policies relating to these allocations would benefit from further refinement and clarification to ensure they are effective.
  - There is potential to increase the land area for development at Latton Priory, which will also maximise the effectiveness of the site as a new Garden Town Community. The current proposed new Green Belt boundary is not properly evidenced or justified and needs to be realigned to meet the requirements of NPPF paragraph 85.
  - The potential to provide strategic employment land at the Garden Town Communities and at Latton Priory in particular close to junction 7 of the M11, warrants further examination to maximise the sustainability benefits of the development and make a major contribution to the delivery of new jobs in the most accessible and marketable employment location in the District.
  - We consider Latton Priory to be the least constrained of the strategic site allocations, the site that is most capable of early delivery and that it has potential to accommodate housing additional to the current allocation.
    - The opportunity to create a north/south Sustainable Transport Corridor through Harlow is supported subject to further assessment and, if found sound, should carry a specific policy commitment.
    - Our Clients support the ongoing commitment to working across boundaries in the HMA.
- 8.4 Our clients' site can provide the following benefits:

- Land at Latton Priory can deliver early in the plan period
  - The site is within single ownership
  - Its development will provide benefits to both Epping Forest and Harlow
  - The topography of this area defines an area that is highly contained in landscape terms
  - Makes a limited contribution to the Green Belt
  - Provides the opportunity for regeneration
  - Can provide an early phase of development in a location with the least demands upon major infrastructure
- 8.5 Latton Priory has been promoted for a number of years through the Development Plan process, during which time a thorough and robust evidence base has been drawn up in support of the development of the site. The technical work undertaken demonstrates that the site is available for early delivery in the plan period to make a valuable contribution towards meeting housing needs.
- 8.6 The site is at the lowest risk of flooding and there are no insurmountable barriers to infrastructures, service or technical constraints.
- 8.7 There is both an opportunity to create a logical and defensible Green Belt boundary and to extend Harlow's green wedge.
- 8.8 Development of the site will be capable of providing a viable package of highways mitigation but it will also be able to deliver highways improvements to provide greater capacity to the transport network.
- 8.9 The proposed employment area, together with local services and amenities within the site will help reduce the need to travel outside the local area.
- 8.10 Market demand advice and economic reports lend weight to the viability of the site and its early release for development. Latton Priory is well positioned to deliver an integrated extension to Harlow and there are no overriding constraints to its development.
- 8.11 We consider that Latton Priory is unconstrained relative to the other proposed Garden Town Communities which have greater environmental constraints and more significant infrastructure requirements and, for these reasons, may not be able to support the level of development proposed for them, or delivery at the necessary rate.
- 8.12 These representations are therefore submitted for due consideration.





# Boyer

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