

Committee Agenda



**Epping Forest
District Council**

Local Development Framework Cabinet Committee Thursday, 17th June, 2010

Place: Council Chamber, Civic Offices, High Street, Epping

Time: 7.00 pm

Democratic Services Officer: Gary Woodhall (Office of the Chief Executive)
Email: gwoodhall@eppingforestdc.gov.uk
Tel: 01992 564470

Members:

Councillors Mrs D Collins (Chairman), R Bassett, B Rolfe, Mrs M Sartin, Ms S Stavrou and Mrs L Wagland

PLEASE NOTE THE START TIME OF THIS MEETING

1. WEBCASTING INTRODUCTION

1. This meeting is to be webcast. Members are reminded of the need to activate their microphones before speaking.

2. The Chairman will read the following announcement:

“I would like to remind everyone present that this meeting will be broadcast live to the Internet and will be capable of subsequent repeated viewing, with copies of the recording being made available for those that request it.

By being present at this meeting, it is likely that the recording cameras will capture your image and this will result in your image becoming part of the broadcast.

You should be aware that this may infringe your human and data protection rights. If you have any concerns then please speak to the Webcasting Officer.

Please could I also remind Members to activate their microphones before speaking.”

2. APOLOGIES FOR ABSENCE

3. DECLARATIONS OF INTEREST

(Assistant to the Chief Executive) To declare interests in any item on the agenda.

4. MINUTES

To confirm the minutes of the last meeting of the Cabinet Committee.

5. TERMS OF REFERENCE

To note the Terms of reference for the Cabinet Committee, as agreed by the Council on 17 February 2009; minute 113(a) refers.

(1) That a Local Development Framework Cabinet Committee be appointed with the following terms of reference:

(a) To oversee and submit recommendations to the Cabinet as appropriate on:

(i) the preparation of the Local Development Framework (LDF);

(ii) the preparation of the Core Strategy including agreement of consultation stages and documentation, and the responses that should be made to any representations received;

(iii) the preparation of other Development Plan Documents including agreement of consultation stages and documentation, and the responses that should be made to any representations received;

(iv) the preparation of Supplementary Planning Documents including agreement of consultation stages and documentation, and the responses that should be made to any representations received; and

(v) the revision of the Local Development Scheme and monitoring the achievement of milestones;

(b) To consider and provide input to consultants' reports which contribute to the establishment of an up-to-date evidence base to influence preparation of the LDF;

(c) To consider options for joint or coordinated working with other councils, which best meet the needs of this District, as required by the East of England Plan and (where relevant) the London Plan and to make recommendations to the Cabinet thereon;

(d) To consider the comprehensive review of the East of England Plan, and make recommendations to the Cabinet on any responses to be made;

(e) To liaise with the Planning Services Scrutiny Standing Panel as appropriate; and

(f) To work within the budgetary provision for the LDF, as approved by the Cabinet and the Council.

6. ANY OTHER BUSINESS

Section 100B(4)(b) of the Local Government Act 1972, together with paragraphs (6) and (24) of the Council Procedure Rules contained in the Constitution requires that the permission of the Chairman be obtained, after prior notice to the Chief Executive,

before urgent business not specified in the agenda (including a supplementary agenda of which the statutory period of notice has been given) may be transacted.

In accordance with Operational Standing Order (6) (non-executive bodies), any item raised by a non-member shall require the support of a member of the Cabinet Committee and the Chairman of the Cabinet Committee. Two weeks' notice of non-urgent items is required.

7. STRATEGIC HOUSING MARKET ASSESSMENT - FINAL REPORT (Pages 5 - 26)

(Director of Planning & Economic Development) To consider the attached report (LDF-004-2010/11).

8. SPATIAL OPTIONS FOR THE HARLOW AREA - SCOTT WILSON REPORT (Pages 27 - 34)

(Director of Planning & Economic Development) To consider the attached report (LDF-003-2010/11).

9. ABOLITION OF REGIONAL STRATEGIES

(Director of Planning & Economic Development) To consider the attached report (report to follow).

10. EXCLUSION OF PUBLIC AND PRESS

Exclusion

To consider whether, under Section 100(A)(4) of the Local Government Act 1972, the public and press should be excluded from the meeting for the items of business set out below on grounds that they will involve the likely disclosure of exempt information as defined in the following paragraph(s) of Part 1 of Schedule 12A of the Act (as amended) or are confidential under Section 100(A)(2):

| Agenda Item No | Subject | Exempt Information Paragraph Number |
|-----------------------|----------------|--|
| Nil | Nil | Nil |

The Local Government (Access to Information) (Variation) Order 2006, which came into effect on 1 March 2006, requires the Council to consider whether maintaining the exemption listed above outweighs the potential public interest in disclosing the information. Any member who considers that this test should be applied to any currently exempted matter on this agenda should contact the proper officer at least 24 hours prior to the meeting.

Confidential Items Commencement

Paragraph (9) of the Council Procedure Rules contained in the Constitution require:

- (1) All business of the Council requiring to be transacted in the presence of the press and public to be completed by 10.00pm at the latest.
- (2) At the time appointed under (1) above, the Chairman shall permit the completion of debate on any item still under consideration, and at his or her discretion, any other remaining business whereupon the Council shall proceed

to exclude the public and press.

- (3) Any public business remaining to be dealt with shall be deferred until after the completion of the private part of the meeting, including items submitted for report rather than decision.

Background Papers

Paragraph (8) of the Access to Information Procedure Rules of the Constitution define background papers as being documents relating to the subject matter of the report which in the Proper Officer's opinion:

- (a) disclose any facts or matters on which the report or an important part of the report is based; and
- (b) have been relied on to a material extent in preparing the report and does not include published works or those which disclose exempt or confidential information (as defined in Rule 10) and in respect of executive reports, the advice of any political advisor.

Inspection of background papers may be arranged by contacting the officer responsible for the item.

Report to the Local Development Framework Cabinet Committee



**Epping Forest
District Council**

Report reference: LDF-003-2010/11
Date of meeting: 17 June 2010

Portfolio: Leader

Subject: Strategic Housing Market Assessment – Final Report

Responsible Officer: Amanda Wintle (01992 564543)

Democratic Services Officer: Gary Woodhall (01992 564470)

Recommendations/Decisions Required:

- (1) To note the findings of the completed “Strategic Housing Market Assessment” report, and add this into the evidence base to support the preparation of the Local Development Framework;**
- (2) To note that a further piece of research is currently underway to establish the viability of the provision of affordable housing.**

Executive Summary:

The Strategic Housing Market Assessment (SHMA) is required by Planning Policy Statement 3: *Housing* to inform the preparation of housing policies in the Core Strategy and other parts of the Local Development Framework.

The SHMA has been carried out across six local authority areas, these being Epping Forest, Harlow, East Herts and Uttlesford District Councils and Brentwood and Broxbourne Borough Councils. It uses data on house prices, housing demand, migration patterns and travel-to-work patterns to determine the Housing Market Areas that exist across the sub-region.

The SHMA considers the need for a variety of housing types across the sub-region, including affordable housing, the impacts of migration, households in unsuitable accommodation, the housing needs of older people and Black & Minority Ethnic groups.

The key finding of the SHMA in relation to affordable housing is that there is an overall need for 70% of all new housing to be affordable (social rented and intermediate housing). Further work is currently being completed to test the viability of the provision of affordable housing in the district.

Reasons for Proposed Decision:

The SHMA is an important part of the evidence base to underpin the preparation of the Core Strategy. This new evidence will help to achieve corporate objectives of increasing the provision of affordable housing in the District, and guide strategies in relation to other types of housing provision.

Other Options for Action:

This study has been undertaken to inform the preparation of the Local Development Framework, and is based on publically available technical and statistical information. Without such a study any housing policies in the Local Development Framework would be found unsound, and therefore there are no reasonable alternative options.

Report:

1. Planning Policy Statement (PPS) 3: *Housing* (2006) requires that planning policies within Local Development Frameworks are based on robust evidence of housing need and demand. The Strategic Housing Market Assessment (SHMA) provides this evidence. In March 2008, the London Commuter Belt (East) consortium appointed Opinion Research Services (ORS) working with Savills to undertake this work, following a full tendering process. The consortium includes Epping Forest, Harlow, East Herts, Broxbourne, Brentwood and Uttlesford Councils, and the study seeks to identify the way in which the various housing markets operate at a sub-regional and district level.

2. The SHMA has been prepared in accordance with PPS3 and the supporting guidance. It covers the period to 2026 and provides evidence which will update the information contained in the Housing Needs Survey completed in 2003. It provides an analysis of the housing demand across the district, also taking into account the growth requirements of the East of England Plan. For the purposes of this work, it has been assumed that a total of 6,600 new units will be built within Epping Forest district to fulfil the policy requirements of the East of England Plan, taking into account the proposed growth of Harlow. This assumption was used as a “best estimate” at the outset of the study, prior the final completion of the “Harlow Options” report. The “Harlow Options” report was completed in January 2010, and shows that this assumption was broadly accurate.

3. The coalition Government has made clear its commitment to abolishing Regional Strategies, however this has not yet caused a change to legislation and the future intentions of the Government are not clear. The evidence that the SHMA provides is still relevant and will supply essential information to help shape new planning policies.

Key Findings

Housing Market Areas

4. The Executive Summary prepared by ORS is attached at Appendix 1, and the key findings in respect of Epping Forest District are highlighted below.

5. Housing Market Areas (HMAs) are geographical areas defined by household demand and preferences for housing. They reflect the key linkages between the places where people live and work. PPS3 recognises that HMAs do not often coordinate with local authority boundaries, and therefore local planning authorities should have regard to wider HMAs when considering the need for different types of housing. Parts of five different HMAs cover Epping Forest District (see Appendix 2), highlighting the diverse nature of the district, and the varying relationships that exist. In considering the most appropriate housing policies for the new Local Development Framework, the Council will need to have regard to the impact of these HMAs.

Affordable Housing

6. The SHMA draws out key findings in respect of affordable housing provision, tenure split and housing size mix across the district. Affordable housing is defined as being either

social rented housing or intermediate housing. Social rented housing is that which is provided by EFDC or a Registered Social Landlord at a specified level of rent. Intermediate housing is the term used cover a variety of housing types where the price or rent is above the level of social rent, but below open market prices.

7. Across the sub-region, the SHMA identifies that 46% of all new dwellings should be affordable. At a district level, this increases to a need for 70% of all new dwellings to be affordable. Of this 70%, it is suggested that 63% should be social rented units, and 38% should be intermediate affordable housing (figures may not sum due to rounding). The Council's current policy is to seek 70% of affordable housing as social rented units and 30% as intermediate units. The Council will need to consider whether, in light of this evidence, the tenures sought should be amended. The figures presented in the SHMA are on the basis that a balanced housing market should be achieved.

8. Intermediate housing seeks to address the needs of those households that earn between £20,000 and £35,000. Below this income range, there are housing benefits which will subsidise housing costs, and above this there are "entry level" properties that are affordable. For those households within this band, there is a shortage of housing products to suit their needs. However, there is a wider debate to be had about whether this is an achievable objective, or whether resources should be concentrated towards helping those that are in the most need.

9. Within each of the different tenures, the SHMA identifies a need for a variety of house sizes, which is summarised in the table below:

| Dwelling size | Market housing | Intermediate affordable housing | Social rented affordable housing |
|----------------------|-----------------------|--|---|
| 1 bedroom | 0.5% | 12.1% | 40.0% |
| 2 bedrooms | 31.6% | 42.7% | 28.1% |
| 3 bedrooms | 47.1% | 39.5% | 27.9% |
| 4 bedrooms | 17.2% | 4.8% | 3.7% |
| 5+ bedrooms | 3.7% | 0.9% | 0.3% |

10. On the basis of the evidence provided in the SHMA and other appropriate sources, the Core Strategy will need to incorporate housing policies which seek a suitable level of affordable housing over the plan period (i.e. to 2031).

Viability of Delivery

11. Planning policies must also take into account matters such as the viability of development. In December 2009, Levvel were appointed to undertake an assessment of the viability of affordable housing provision suggested in the SHMA. This work is being carried out on behalf of Epping Forest, East Herts, Harlow, Brentwood and Uttlesford Councils (Broxbourne Council's timetable for their Core Strategy did not permit them to be part of this further piece of joint work). This further work is due to be completed by July 2010, and when completed will have tested a number of scenarios, taking into account available information on other matters including section 106 costs and land type. This viability work is part of a two-stage process, the second of which is part of the Strategic Housing Land Availability Assessment (SHLAA), during which specific sites will be tested in terms of the viability of delivery of affordable housing.

Housing Needs of Specific Groups

12. The SHMA also considers the housing requirements of specific groups identified in

government guidance. These groups are older people (including those with supported housing and health needs), black and minority ethnic population (including homelessness) and rural households.

13. Despite the trend of an ageing population, there is an over supply of units for older peoples' accommodation in Epping Forest. However it has been identified that much of the current accommodation is not fit-for-purpose, either in terms of meeting the Decent Homes standard or by meeting the requirements of the Disability Discrimination Act. The Council will therefore need to consider the most appropriate method of meeting the housing needs of an ageing population.

14. The need for rural affordable housing is also identified across the study area, however specific figures are not provided for each local authority area. This is a matter which must be addressed at a local authority level on a individual settlement basis.

Resource Implications:

The cost of this project is £59,950 with an additional £3,117 for advertising fees associated with the tender process. The total of £63,067 has been split equally between the six authorities. EFDC's contribution of £12,267 was funded from the LDF budget.

Legal and Governance Implications:

None relevant.

Safer, Cleaner and Greener Implications:

None relevant at this time.

Consultation Undertaken:

Key stakeholder events were undertaken through the preparation of the SHMA.

Background Papers:

London Commuter Belt (East) / M11 Sub-Region – Strategic Market Housing Assessment, January 2010 – Opinion Research Services / Savills.

Impact Assessments:

Risk Management

Some earlier SHMAs prepared by other authorities were found to be unsound because viability had not been assessed. This significant risk will be addresses by the supplementary report.

Equality and Diversity:

Preparation of the Local Development Framework as a whole will be subject to an Equality Impact Assessment at a later date.

Did the initial assessment of the proposals contained in this report for relevance to the Council's general equality duties, reveal any potentially adverse equality implications? No

Where equality implications were identified through the initial assessment process, has a formal Equality Impact Assessment been undertaken? N/A

What equality implications were identified through the Equality Impact Assessment process?
N/A.

How have the equality implications identified through the Equality Impact Assessment been addressed in this report in order to avoid discrimination against any particular group?
N/A.

This page is intentionally left blank

Strategic Housing Market Assessment Report

Executive Summary

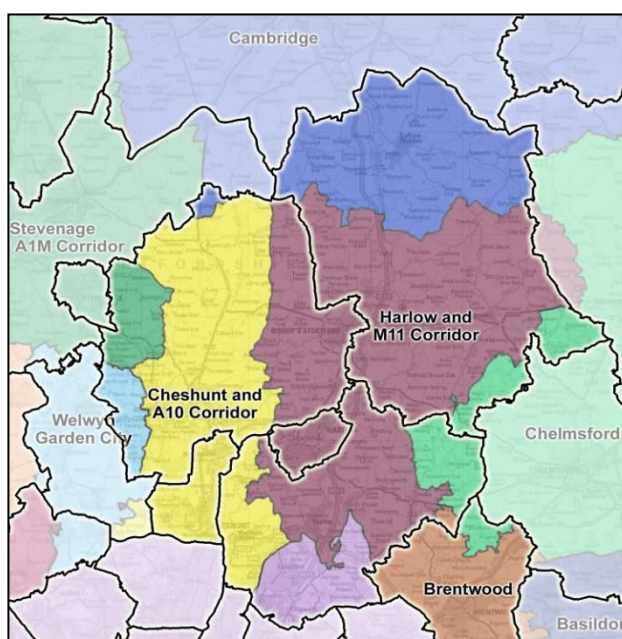
Introduction

1. This is an executive summary of the Strategic Housing Market Assessment (SHMA) report for the housing markets of the London Commuter Belt (East)/M11 sub-region (LCB (East)).
2. The SHMA was commissioned in 2008 by Brentwood Borough Council, Broxbourne Borough Council, East Herts District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council which, for the purposes of this study, are collectively called the London Commuter Belt (East)/M11 sub-region

What is a SHMA?

3. A SHMA is a framework that local authorities and regional bodies can follow to develop a good understanding of how housing markets operate. It promotes an approach to assessing housing need and demand which can inform the development of local development document and regional spatial strategy planning for housing policies, as set out in Planning Policy Statement 3: Housing (PPS3). The government has issued Practice Guidance setting out the framework of a SHMA and suggests how it might be carried out.
4. The SHMA framework consists of an evidence base and a process. The process included consultation and involvement partners and stakeholders to develop a housing market partnership (HMP). This process enabled those involved to share and pool information, intelligence and will help to ensure that SHMA findings are regularly reviewed; assist in the analysis and interpretation of housing market intelligence; and consider the implications of the assessment.
5. A SHMA should be considered robust and credible if, as a minimum, it provides all of the core outputs and meets the requirements of all of the process criteria stated in the Practice Guidance.

Why the SHMA was undertaken at the sub-regional level?



6. Housing markets do not necessarily follow local authority boundaries. The LCB(East) SHMA has concluded that there are two substantial sub-markets covering most of this area – Cheshunt/A10 to the west of the area and Harlow/M11 to the east of the area – with Brentwood identified as a further independent sub-market. The analysis also showed the north of Uttlesford (including Saffron Walden) to be part of the Cambridge sub-market, while Chigwell and surrounding areas (in the very south of Epping Forest) were associated with North London. The Chelmsford, Stevenage and Welwyn Garden City housing sub-markets all

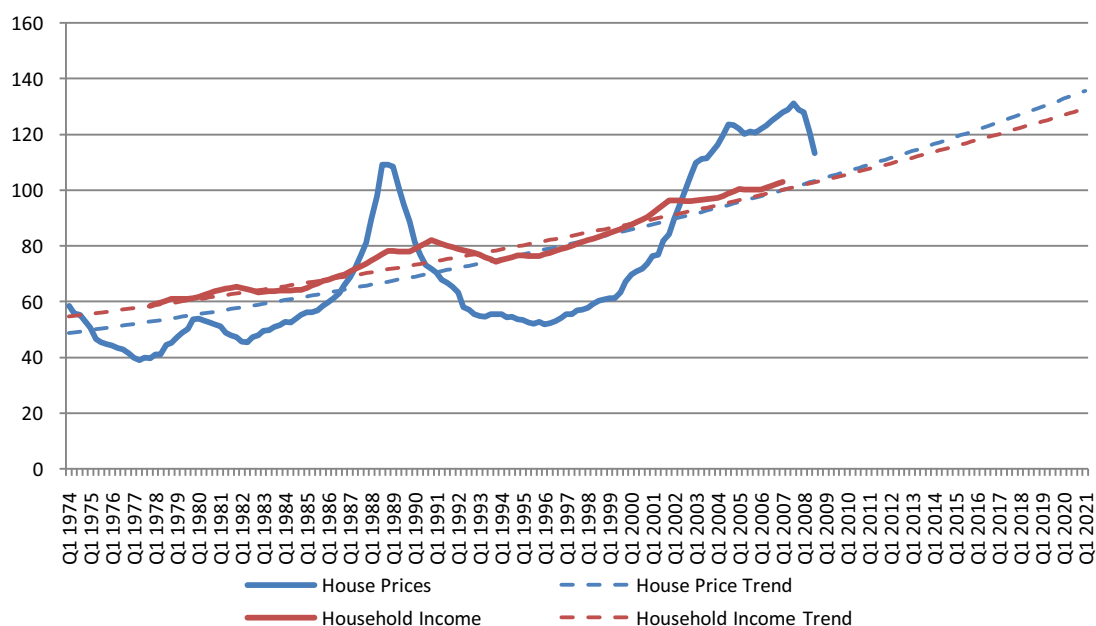
encroach into LCB (East)/M11 sub-region, but none include any significantly populated areas.

What methods were employed what assumptions were made?

7. Consultants ORS have developed housing market models to estimate the future housing requirements of existing and emerging households. Models are based upon a large number of secondary data sources such as the Census, the Land Registry, Local Authority records etc.
8. The SHMA uses the following definitions, information and processes;
 - PPS3 definitions and requirements;
 - Use of trend based assessment of the social housing requirement in the context of increasing numbers of households, changing demographics and future sales of existing social housing stock;
 - Use of secondary data on house prices and incomes. Conclusions about housing requirements are based upon long term price and income trends rather than a snapshot at a point in time (Figure 1);

Figure 1

Average House Price and Average Household Income Trends (Note: Long-term trends at Q1 2007 = 100. Source: Nationwide House Price Index, Seasonally Adjusted; Halifax House Price Index, Seasonally Adjusted; CLG Live Tables; Retail Price Index, ONS; Social Trends ONS, Regional Trends ONS)



- The housing requirement by 2021 (the overall number of new homes) is that envisaged by the East of England Plan 2008 (Secretary of State's Revisions). Policy H1 of the Plan sets out the distribution of dwelling provision across the sub-region for the period 2001-2021 (**Error! Reference source not found.**Figure 2);
- To achieve a projected level of housing delivery to 2026, the annual delivery rates within the East of England RSS 2001-2021 have been rolled forward to 2026. The RSS 2001-2021 identifies a target of 48,600 (Figure 2 below) dwellings across the sub-region; and

which equates to a delivery target of 2,430 per annum. This in turn equates to 12,150 over a five year period. Therefore, the modelled housing requirements to 2026 have assumed a dwellings delivery of 48,600 plus an additional 12,150 for the period 2021-2026 giving a total of 60,750 which has been rounded to 60,800 additional dwellings. The East of England RSS is currently under review with on-going consultation on the new RSS covering the period 2011-2031.

Figure 2

District Housing Requirement 2001-2021 for LCB (East)/M11 Sub-region (from RSS Policy H1). Note: Figures are for overall net requirements and the figure for Harlow is for total housing growth at Harlow, including urban extensions in Epping Forest and East Hertfordshire districts. (Source: East of England Plan, 2008, Government Office for the East of England).

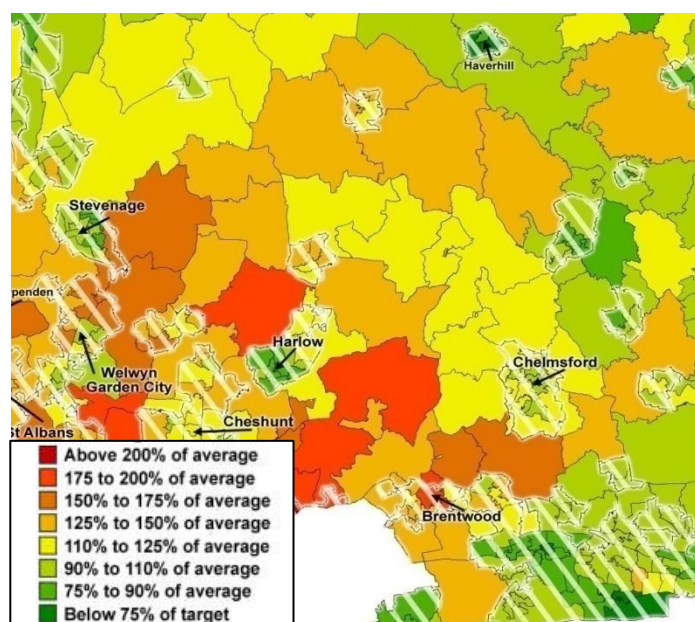
| Local Authority Area | Total to Build April 2001 to March 2021 | | Of which Already Built April 2001 to March 2006 | | Minimum still to build April 2006-March 2021 | |
|----------------------|--|--------------|--|--------------|---|--------------|
| | Total | Annual Rate | Total | Annual Rate | Total | Annual Rate |
| Brentwood | 3,500 | 175 | 920 | 180 | 2,580 | 170 |
| Broxbourne | 5,600 | 280 | 1,950 | 390 | 3,650 | 240 |
| East Herts | 12,000 | 600 | 2,140 | 430 | 9,860 | 660 |
| Epping Forest | 3,500 | 175 | 1,210 | 240 | 2,290 | 150 |
| Harlow | 16,000* | 800 | 810 | 160 | 15,190 | 1,010 |
| Uttlesford | 8,000 | 400 | 1,610 | 320 | 6,390 | 430 |
| Total | 48,600 | 2,430 | 8,640 | 1,720 | 39,960 | 2,660 |

Who was involved in the project?

- The client councils formed a project group consisting of senior officials who were responsible for the delivery of the project. Stakeholders were consulted at key stages of the project and participated in consultation workshops. Formal consultation on the SHMA report was managed via the ORS extranet. The client councils agreed report amendments following consultation.

SHMA findings

What are the main characteristics of the housing markets?



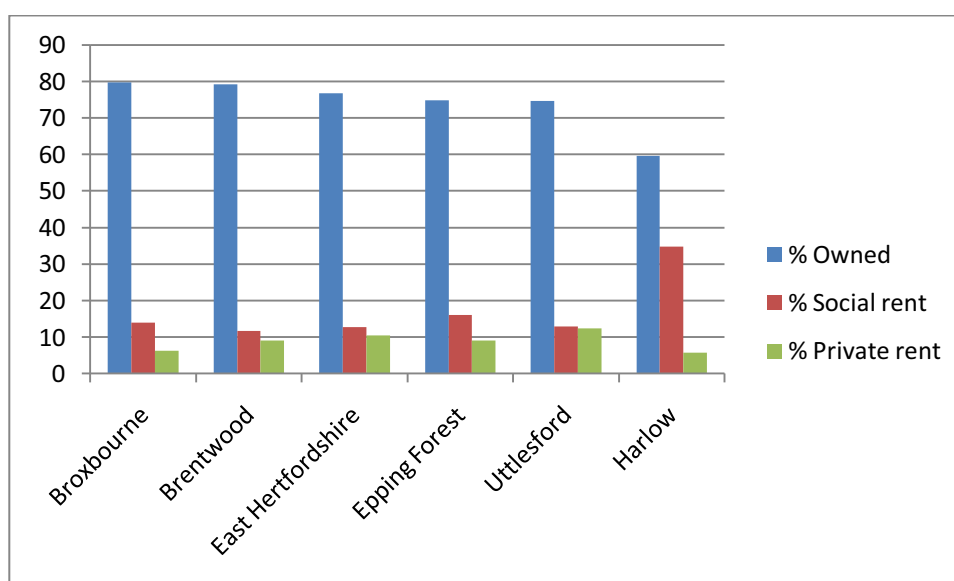
- The adjacent map shows the variation of **house prices** from The East of England average adjusted for property type for the period October 2006 to September 2007. Hatched areas are urban areas. Areas in red are where house prices are over 200% of the East of England regional average. The urban area of Harlow shows the lowest house prices and the area around Chigwell the highest.

- The highest levels of **deprivation** and unsuitable housing in the sub-region are associated with both

Harlow and some of the rural areas to the South. Relatively high levels of deprivation in rural areas are not unusual due to large numbers of retired households on relatively low incomes some of whom live in dwellings with higher heating costs. That said, when compared to other areas in England and Wales, deprivation in LCB (East) is low with most areas in the lowest quartile for deprivation relative to the rest of the country.

12. Regarding **dwelling type**, across the sub-region about a quarter is detached housing with semi-detached 28%, terraced 25% and flats around 18% of the stock. There are considerable variations by Local Authority. Harlow has the highest proportion of terraced dwellings (50% of its stock) and flats (22%). It has the lowest proportion of detached dwellings (10%). Uttlesford has the highest proportion of detached dwellings (42% of its stock). Dwelling type varies greatly by tenure with owner-occupied housing having near equal proportions of terraced, semi detached and detached housing but relatively few flats (just under 10% of the stock). In contrast social rent and private rent has a much higher proportion of flats at just over 40% of the stock of each tenure.
13. The dominant **tenure** in LCB (East) is owner occupation (84%) of the total stock. Over 35% of the housing stock in Brentwood is owned outright (i.e. not subject to a mortgage) with slightly lower proportions in other Local Authority areas. Harlow has the lowest proportion at around 18%. (Figure 3).

Figure 3
Housing tenure by District 2001 for the LCB (East)/M11 Sub-region (Source: Census 2001).



14. The overall proportion of social rented housing in LCB (East) is slightly higher than the English average but lower than the East of England average although there are key differences between the authorities. Harlow has the highest proportion of social housing in the eastern region (at 33.1% of all dwellings), while 15.4% of the dwelling stock of Epping Forest is social housing. Brentwood has the lowest proportion of social housing at around 11.9%.
15. In 2001, around 9% of the housing stock in LCB (East) was in the private rented sector. In Uttlesford private rented housing accounts for 12% of the stock – twice the proportion of Harlow's private rented stock. Harlow has the lowest proportion of private rented housing of its

stock compared to other Local Authorities. This sector is primarily housing single people and multi-adult households. In recent years the private rented sector has grown in size and importance relative to other tenures. This is mainly due to buy to let investors responding to a growth in the market for private renting. This is due to shortages of affordable housing and the trend of home ownership becoming out of reach of a growing number of households. The rate of growth has slowed considerably due to the credit crunch.

16. This information is the housing context for a sub-region undergoing **significant change** in its housing and job markets due to rapid planned expansion. The policy aims are to link growth in the area with improvements in the infrastructure to improve long term sustainability; reduce commuting and improve the connection between living and working in the housing sub-markets.

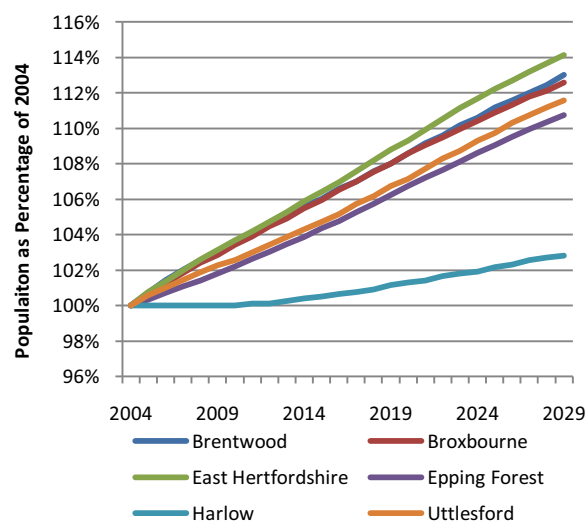
What are the drivers for change affecting the housing markets?

Demographic change

17. Nationally **demographic drivers** result in the population increasing through a combination of more births, fewer deaths and a net inward migration from overseas.

18. Based on population estimates from 2004, the Office of National Statistics estimate that the population of LCB (East)/M11 sub-region will rise to 620,000 by 2029. This would represent an 11% rise in the period 2004-2029 – an additional 62,000 people living within the study area. Of these 12,200 of these are projected to be aged 85 or over with a further 44,200 aged 60-84 years. (Figure 4).

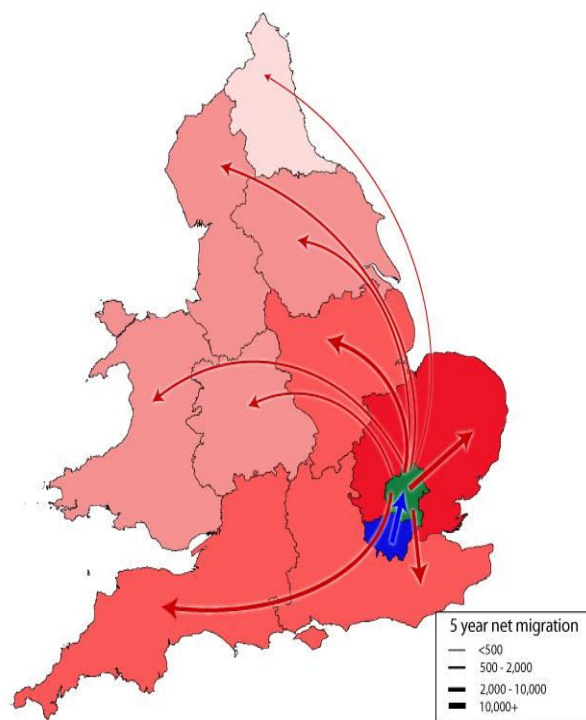
Figure 4
Population Projections by Local Authority 2004-2029 (Source: ONS Revised Sub-national Population Projections: 2004 based data)



19. Analysis of household composition at the census shows that almost a quarter of the sub-region's households contain only pensioners, while 50% contain adult couples with or without children. Just over 20% of households contain only one adult in the form of a single person or lone parent. Household type does not vary greatly between Local Authority areas, however it is clear that Harlow contains the highest proportion of households (around 26%) of single adults, either as single people or as lone parents. Brentwood has the highest proportion of all pensioner households. It is important to consider the structure of households when assessing housing needs. An area with more single people requires more separate accommodation, while an area with large families will require larger houses to accommodate them.
20. Data from the 2001 Census showed that of the sub-region's 547,000 residents, 55,700 (10.2%) had moved within the last 12-months. Of those that had moved, 25,000 moved within the same

authority, another 25,000 moved from elsewhere in the UK and 2,600 moved to the area from overseas. The sub-region gained a net 1,060 people from across the UK in 2000-2001.

21. The figure below demonstrates the **migration flows** in and out of the study area. The study area is depicted in green. The thickness of arrows represents higher levels of net migration.



22. Overall, migration accounted for a rise in the sub-region population of 4,220 people from 2001 to 2006. All of the net population gain came from London, with net migrant population losses occurring to every other region of England and Wales.

23. Most of the net population gain came from North London but also some from East London.

24. Highest population losses through out-migration were to other parts of Essex – Braintree and Chelmsford, North Hertfordshire and South Cambridgeshire.

25. There are some interesting migration flows within the sub region. Broxbourne lost population through migration to all other authorities in the sub-region. It gained over 9,470 people from London. Uttlesford gained population from all other authorities in the sub-region, further reflecting the movement of population away from North London. Harlow lost a significant number of people through migration to East Hertfordshire and Uttlesford but gained from Broxbourne and Epping Forest.

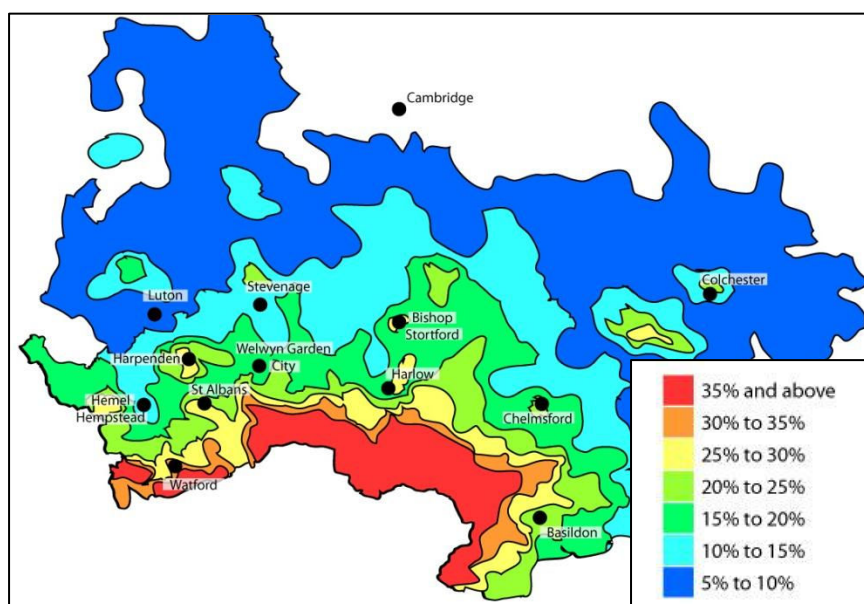
26. The area has seen a growth in population from overseas. Between 2001 and 2006, a net 1,400 international migrants moved to LCB (East) from overseas. Nearly a half of all new national insurance registrations were issued to Polish nationals.

Commuting

27. Figure 5 illustrates the influence of Greater London on an area which covers large parts of Hertfordshire and Essex. The isobars show the proportion of the total workforce that travel to work in London. Areas coloured in red have 35% or more of their workforce travelling to any part of Greater London to work, areas in dark blue have less than 10% of their workforce travelling to London.

Figure 5

Travel to Work to London Across the wider London Commuter Belt (Source: UK Census of Population 2001. Note: bands represent the percentage of the employed resident population who work in the London region)



28. Census (2001) data identifies 170,000 people who both live and work in the London Commuter Belt (East)/M11 sub-region. This represents around 61% of all those living in the area who have a job, and 73% of all those who work in the area. Of this group, 26,200 work mainly at or from home, equivalent to 9.5 % of all those residents who have jobs. This is similar to the national and regional proportion of workers who work from home.

Economic Factors

29. The unemployment claimant count was lower in all of the Local Authority areas than in England or the Eastern region. The workplace population of LCB (East) has been declining since 2001.
30. Since 1997 there has been a 25% growth in the number of VAT registered businesses, which is above the England and Eastern region averages. Uttlesford has experienced the largest increase, and Harlow the lowest.
31. Compared to the population of England and Wales or the Eastern region as a whole, there are more people employed in managerial, professional and administrative occupations and fewer in skilled, plant and machinery and elementary professions. Also the population of LCB (East) is slightly under-represented in the higher qualification categories with under a fifth of the population having the equivalent of a degree or above. However, there is a lower proportion of people in LCB (East)/M11 sub-region with no qualification than in England and Wales or the Eastern region.
32. Residents in Brentwood and Uttlesford have the highest incomes in the sub-region. Those employed in Harlow earn more on average than those who are resident in the area by around £7,000 per annum. This pattern is reversed in all other areas, but it may imply that many residents travel outside the sub-region to higher paying jobs elsewhere in areas such as London.
33. Household incomes are on average lower in urban areas such as Harlow and Saffron Walden.

What is the requirement for additional housing to 2026?

34. Analysis of **affordability** of house prices and incomes of households who are not home owners was undertaken. It shows that there is virtually a complete absence of market housing options affordable to households with incomes less than £30,000. Much of the housing available to this group is in the private rented sector, and only if households commit more than 25% of their income to rent. Affordability considerations are used by the ORS housing market model to determine the requirements for intermediate affordable and market housing.
35. The overall estimated housing requirement for each Local Authority summarised in the Figure 6 below. This is a key output of the study and is part of the evidence required for each Local Authority's affordable housing policy. For comparison, estimates are based upon house prices and incomes being at 2007/8 levels and secondly at their long term trend levels (figure 1).
36. In both cases the housing growth targets for each Local Authority are used given in figure 2 (RSS Policy H1) minus the new housing delivered between 2001 and 2007, plus the projected growth target to 2026. The model estimates the requirement for affordable housing, deducts this from the total requirement and the market requirement is the balance.
37. The model estimates the tenure (Figure 6), and number of bedrooms that should be built in each Local Authority area.

Figure 6
Housing Requirement by LA 2007-2026 (Note: Figures may not sum due to rounding)

| Housing Type | Local Authority | | | | | |
|---|-----------------|--------------|---------------|---------------|---------------|--------------|
| | Brentwood | Broxbourne | East Herts | Epping Forest | Harlow | Uttlesford |
| Prices based on 2007-08 levels | | | | | | |
| Market housing | (1,100) | 700 | 5,400 | (500) | 8,400 | 2,500 |
| Intermediate affordable housing | 3,400 | 2,600 | 8,000 | 4,200 | 1,300 | 4,300 |
| Social rented housing | 1,000 | 1,600 | 1,800 | 2,900 | 2,500 | 1,300 |
| Total Housing Requirement | 3,200 | 4,800 | 15,200 | 6,600 | 12,200 | 8,100 |
| Market housing | - | 14.1% | 35.7% | 0.0% | 68.7% | 30.7% |
| Intermediate affordable housing | 78.0% | 53.2% | 52.8% | 59.1% | 10.7% | 53.2% |
| Social rented housing | 22.0% | 32.7% | 11.5% | 40.9% | 20.5% | 16.1% |
| Prices based on long-term trends | | | | | | |
| Market housing | 200 | 2,300 | 8,300 | 2,000 | 9,700 | 4,200 |
| Intermediate affordable housing | 2,100 | 900 | 5,100 | 1,800 | 0 | 2,600 |
| Social rented housing | 1,000 | 1,600 | 1,800 | 2,900 | 2,500 | 1,300 |
| Total Housing Requirement | 3,200 | 4,800 | 15,200 | 6,600 | 12,200 | 8,100 |
| Market housing | 4.9% | 48.0% | 54.7% | 29.6% | 79.5% | 51.5% |
| Intermediate affordable housing | 65.5% | 19.3% | 33.7% | 26.5% | - | 32.4% |
| Social rented housing | 29.6% | 32.7% | 11.5% | 43.9% | 20.5% | 16.1% |

38. Referring to outputs for long term trends, the requirement for additional affordable housing is a large proportion of the overall requirement for each Local Authority with the exception of Harlow. There is no intermediate affordable housing requirement for Harlow. This can be explained by the combination of Harlow's large stock of social housing and its relatively low

market housing prices. Market housing is affordable to a greater proportion of households resident in Harlow than the other Local Authorities and this explains why the estimated future requirement is higher here than the other Local Authorities. There is little requirement for additional market housing in Brentwood because it is not affordable to many households who are not already home owners. The supply of second hand housing is likely to be sufficient for the future and affordable to households who are already home owners due to equity in their existing home. Brentwood Broxbourne and Epping Forest require larger proportions of additional social housing.

39. The model demonstrates that if market prices were to return to higher 2007/8 levels the requirement for market housing would reduce and intermediate affordable housing requirements would increase, (figure 6). We conclude that the requirement for intermediate affordable housing is sensitive to changes in the price of market housing.
40. Further analysis of long term affordability trends (figure 1) adds to the evidence that there will be **a long term shift away from home ownership to private renting**. In addition the SHMA estimates that assuming that the relationship between housing costs and household income remains constant, the proportion of households who are homeowners is likely to fall to from 74% in 2001 to 64% by 2026. This does not take into account the possibility that more prudent lending criteria as a result of the credit crunch may result in an even smaller proportion of home owners by 2026.
41. The SHMA also **estimates the dwelling size** for new build housing by tenure that would result in the best fit of dwellings to households based upon existing patterns of home occupancy and projecting forward demographic change. The full table is not reproduced here as it is a large table. In summary;
 - For market housing, around 50% of the future supply of new housing should be for 3 bedroom homes. Between 8% and 25% of the future supply depending upon the Local Authority area should be 4 bedroom homes;
 - For intermediate affordable housing, with the exception of Harlow, the supply of new housing should be more balanced but with a slightly higher proportion of smaller (1 and 2 bedroom) homes; and
 - For social housing, around 70% of the future supply should be for smaller (1 and 2 bedroom) homes.
42. Households requiring 1 and 2 bedroom homes are likely to be either older person households, single parents, couples with or without children and single people. Younger households without children in good health will not be considered a high priority for social housing which is largely allocated to households on the basis of the severity of housing need. Older person households may require support rather than re-housing to ensure that their existing home is safe and suitable. Frail older people will require more specialised housing with high levels of support known as extra care housing.
43. The small number of larger households requiring 4 bedroom affordable housing will have low income. Some will be in considerable housing need and will be considered a high priority for

large units of social housing for which there is a shortage. There is further consideration below of such households that may be overcrowded.

Which groups of people experience problems within the housing market?

44. Housing need arises when a household is unable to access suitable housing without financial assistance. The SHMA looked at a number of households groups that were found to be disproportionately in **unsuitable housing** and how unsuitable housing is distributed spatially. Many of the predicted areas of unsuitable housing are in urban areas. 12.8% of households across LCB (East) are predicted to be unsuitably housed equivalent to 31,100 households. However the effect on the housing requirement is small as many problems can be resolved without the need for re-housing.
- 2.1 An example of unsuitable housing that often necessitates re-housing is **overcrowding**. In 2001 5.5% of households in the sub-region lived in overcrowded conditions but there are significant variations by Local Authority and tenure. Overcrowding in the private rented sector was highest in Harlow and Broxbourne at 15% of private tenants. In social housing Broxbourne also had the highest level of overcrowding at 18% of all social tenants. There is very little overcrowding in owner occupied housing. The SHMA has established that a high proportion of **BME households** experience overcrowding. 24% of Bangladeshi, 22% of Black African and 20% of Chinese households were overcrowded. In comparison, the lowest proportion of overcrowding was for the White British group at 5.1%.
45. Local Authorities provide a wide range of services to support vulnerable households in their existing housing with the aim of ensuring that they enjoy **independent living** for as long as possible. The SHMA evidences high levels of need for adaptations and support services. Part of the future housing requirement will be for extra-care housing for older people as a consequence of the demographic trend of the ageing population.
46. The SHMA has drawn attention to a **gap in housing provision** for households that can afford more than a social rent but not afford market housing which is known as the intermediate affordable housing tenure. The gap arises because most existing homes in this tenure are shared ownership based and designed to help households into home ownership. These products are not generally affordable to lower income groups within the intermediate income band and are not available to those who do not have the financial standing to qualify for a mortgage. In general terms such households are not a high priority for social housing if they are in good health and do not have children. They will normally be find housing in the private rented sector and will spend a greater proportion of their income on rent than the Government considers reasonable. Intermediate affordable rented housing could assist this group if it were to be made available and at a price affordable to them.

What are the main implications of the SHMA for policy?

47. Policies for the provision of new housing can be informed by considering the dynamics of the housing market. In particular the impact of new build on the second hand housing market and the way in which the market seeks to fill gaps.

48. Although there is a low requirement for additional market housing in some Local Authority areas this does not mean that none should be built. In practice developers will continue bring forward proposals for new build for planning consent where they believe a market exists. It is also essential to deliver housing growth in a sustainable way. The growth of new build housing will tend to attract higher earning in-migrant households to the area. It will also be necessary for new build market housing to be built if affordable housing is to be delivered through the planning system. Overall this is a demand side impact on the housing market which may also result in a supply of cheaper second hand housing being released to the market as a consequence.
49. A priority for new build social housing should be to help alleviate overcrowding. In doing so, there are health and wellbeing benefits for the households themselves. In addition other smaller households will benefit from the dwellings these households vacate.
50. Some older people occupy housing that is too large for them and is also unsuitable given their health, relative low income and vulnerability to cold and tripping hazards. Ensuring that part of the new housing delivery across all tenures was particularly suited to older people, would increase choice for older people. It would benefit the household, health and support services and again release second hand housing into the market.
51. Options exist for helping to fill the gap in housing provision for intermediate housing groups identified by the SHMA and highlighted in the previous section;
- Large numbers of smaller social rented homes could be built but would only benefit this group if lettings policies enable such household to access them;
 - The option exists for intermediate rented housing to be provided with rents pitched at what local households can afford as suggested by PPS3 paragraph 29. This is not to suggest that shared ownership and low cost home ownership should not be provided to assist households who can afford and in so doing improve the social mix of a neighbourhood. It should be recognised that the shared ownership model will not assist most households in the intermediate group; and
 - Encourage use of the private rented sector. This sector has provided a market response to the growing demand for housing, driven by the growing affordability problems of home ownership. This is a trend that the SHMA estimates is likely to continue.
52. Individual Local Authorities can use the SHMA to evidence future affordable housing requirements. It provides the evidence of need to support an affordable housing policy. Local Authorities also need evidence from Economic Viability assessments before an affordable housing policy in accordance with PPS3 paragraph 29 can be determined.

Glossary

| Term | Definition |
|---|---|
| Affordable housing | Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. |
| Affordability | The terms 'affordability' and 'affordable housing' have different meanings. 'Affordability' is a measure of whether housing may be afforded by certain groups of households. |
| PPS3 | Planning Policy Statements (PPS) set out the Government's national policies on aspects of planning in England. PPS3 sets out the national planning policy framework for delivering the Government's housing objectives. A principal aim of PPS3 is to underpin the Government's response to the Barker Review of Housing Supply and the necessary step-change in housing delivery, through a new, more responsive approach to land supply at the local level. It reflects the Government's commitment to improving the affordability and supply of housing in all communities, including rural areas, informed by the findings of the Affordable Rural Housing Commission. |
| Regional Strategy RSS The East of England Plan | The Regional Spatial Strategy (The East of England Plan) is published by the Secretary of State for Communities and Local Government. It covers the counties of Norfolk, Suffolk, Cambridgeshire, Essex, Hertfordshire and Bedfordshire. Together with relevant sections of the Milton Keynes South Midlands Sub-Regional Strategy, 2005 it constitutes the RSS for the East of England. This RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term. In particular it seeks to reduce the region's impact on, and exposure to, the effects of climate change and to put in place a development strategy with the potential to support continued sustainable growth beyond 2021. |
| Viability Assessment | An assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. |

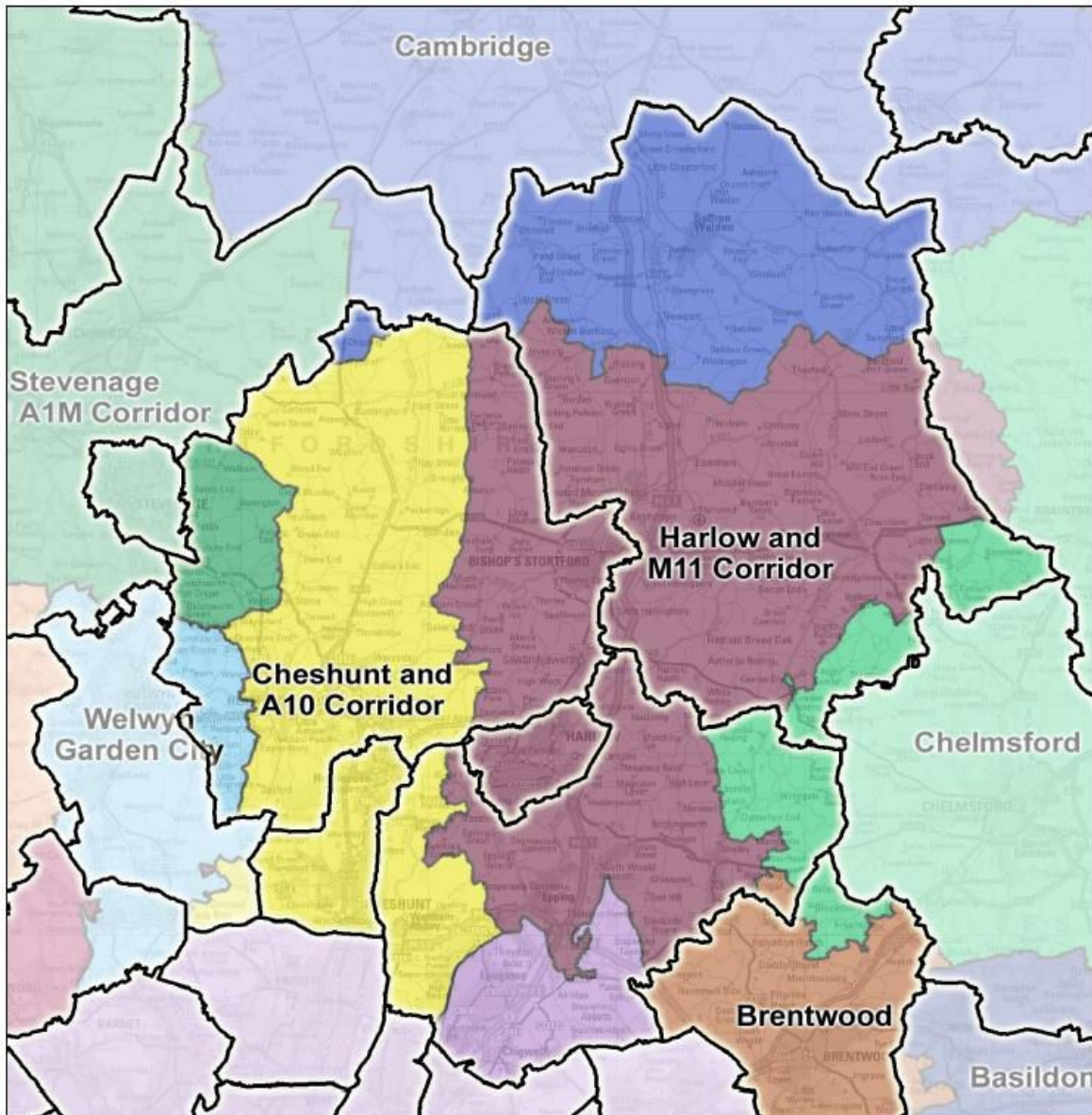
This page is intentionally left blank

Appendix 2 – Housing Market Areas

The diagram below shows the Housing Market Areas that have been identified across the sub-region.

Epping Forest District is covered by parts of five HMAs:

- Cheshunt & A10 corridor
- Harlow & M11 corridor
- Chelmsford
- North London
- Brentwood (a very small part)



(Source: LCB (East) / M11 Strategic Housing Market Assessment, January 2010 (p47))

This page is intentionally left blank

Report to the Local Development Framework Cabinet Committee



**Epping Forest
District Council**

Report reference: LDF-004-2010/11
Date of meeting: 17 June 2010

Portfolio: Leader

**Subject: Generating and Appraising Spatial Options for the Harlow Area –
Scott Wilson Report**

Responsible Officer: Amanda Wintle (01992 564543)

Democratic Services Officer: Gary Woodhall (01992 564470)

Recommendations/Decisions Required:

To note the findings of the completed “Generating and Appraising Spatial Options for the Harlow Area” report, and add this into the evidence base to support the preparation of the Local Development Framework;

Executive Summary:

Scott Wilson was appointed in January 2009 to identify the spatial options that exist around Harlow to deliver the growth envisaged by the East of England Plan. This work is now complete, and a suggested spatial approach has been identified. This suggests that, over the period to 2031, development around Harlow should be distributed as follows; 10,000 dwellings to the north, 7,300 to the east, and 1,000 dwellings each to the west and south. Criteria are suggested for the required review of Green Belt boundaries which will be required, particularly to the north of Harlow, to deliver the growth.

A “Plan-Monitor-Manage” framework is suggested to enable a coordinated approach to be taken across the three district authorities.

Reasons for Proposed Decision:

Policy HA1 of the East of England Plan requires that this study be completed. The Local Development Framework for Epping Forest District must be prepared in accordance with the Regional Spatial Strategy, and this study will now be a key piece of the evidence base to take into account when preparing policies to deliver the requirements of the RSS.

Whilst the coalition Government has made clear its intention to abolish Regional Strategies, this has not yet caused a change in legislation. The East of England Plan is, at present, still part of the Development Plan for Epping Forest District, and therefore the evidence provided by this study is still relevant. Officers will keep the situation under review, and inform Members when the position becomes clearer.

Other Options for Action:

The East of England Plan specifically requires that this work is completed to inform the preparation of the Local Development Framework in Epping Forest, Harlow and East Herts District areas. This study has now been completed following engagement with key

stakeholders and the development industry by an independent organisation. At present, there are no reasonable alternative options.

Report:

1. Policy HA1 of the East of England Plan (May 2008) require:

“...Harlow, East Hertfordshire and Epping Forest District Councils working with county transport authorities, the Regional Assembly, the Government Office and Harlow Renaissance should undertake an appraisal of planning and transport options to inform the preparation of joint or coordinated Local Development Documents. This work should establish the planning framework for Harlow and its urban extensions in accordance with this RSS and an implementation strategy to support its regeneration and growth.”

2. In January 2009, Scott Wilson was appointed jointly by the three local planning authorities to undertake this study, with payment being made through the Programme of Development Fund. The study will form a key piece of evidence for each of the three local authorities in preparing their Core Strategies to cover the period to 2031. The brief to the consultants included four objectives:

(i) To formulate a set of criteria to aid the identification of sustainable locations for regeneration and growth and new Green Belt areas;

(ii) To provide evidence of the spatial options for delivery of regeneration and growth in and around Harlow;

(iii) To inform the scale, phasing and sequencing of regeneration and growth and the implementation requirements needed to support the range of options for delivering the regeneration and growth of Harlow and the surrounding areas; and

(iv) To provide a framework to implement plan-monitor-manage (P-M-M) to demonstrate housing can be implemented at the required pace and ensure regeneration and growth are balanced and sustainable.

3. To meet the requirements of the brief, Scott Wilson defined the “Harlow Area” and identified a number of Spatial Land Areas in and around Harlow. These Areas were used as a basis to collect information, and to assess the impact of growth.

4. Criteria were developed, which were applied to the Spatial Land Areas to identify the extent of land potentially available for development, and then the suitability and deliverability of that land. The criteria were grouped under the following headings:

(a) Exclusionary – land which did not meet these criteria was excluded (using GIS) on the basis that development in these areas would not constitute a “reasonable” option. These areas were defined as “undevelopable” land. Examples of exclusionary criteria are areas of high flood risk, areas of outstanding natural beauty, and international environmental designations.

(b) Discretionary – these criteria did not necessarily lead to the exclusion of land but they were important from a sustainability perspective and would influence the type and likelihood of development. Examples included high quality agricultural land, groundwater protection zones, and areas of lower flood risk.

(c) Opportunity – these criteria enhanced the suitability of a particular site or area.

Examples included opportunities for regeneration, transport routes and accessibility.

5. The criteria were applied to the Spatial Land Areas in the order given above. Under the exclusionary criterion, land was excluded if it fell within any of the following categories: OS Meridian Urban Areas (i.e. the extent of urban development); employment areas; national and local nature designations and; areas designated as Flood Zone 3. Discretionary criteria included issues relating to regeneration, sustainable transport and constraints identified by policy HA1. Finally, the opportunity criteria considered where the most significant gains could be achieved in terms of the regeneration of specific areas of Harlow and the protection of the Green Belt.

6. The application of these criteria led to five spatial options being identified. These options were tested to determine whether they were “reasonable”, and from this a final suggested spatial approach was identified. Summaries of the initial spatial options and the final suggested spatial approach are included in Appendix 1.

7. Spatial Option A (“RSS Northern-led”) took the given parameters of policy HA1 as the central criteria, and focused development primarily to the north of Harlow. This imagined 10,000 new dwellings to the north of Harlow by 2021, with much smaller urban extensions to the east, south and west. However, the significant infrastructure required (particularly transport infrastructure to the north) to enable this development meant that this could not be delivered within the RSS plan period (i.e. by 2021).

8. Spatial Option B (“Policy-led 2”) reflected the directional requirements of policy HA1, but also recognised more strongly the need to ensure there would be significant regeneration benefits arising from any development. However, by splitting development more evenly around Harlow, considerable uncertainty was raised over whether a critical mass would be reached to require significant improvements to the road network. This was particularly the case for developments to the north and east, which could require a new junction with the M11 and a relief road to the north of Harlow. Given the uncertainties which exist over the infrastructure required to deliver this option, it was not considered a reasonable alternative.

9. Spatial Option C (“Combined criteria-led”) deviated significantly from the policy background provided by the East of England Plan. This option was developed by considering how the Spatial Land Areas did against a strict application of the opportunity criteria. It subsequently focused on those areas which performed most positively when the criteria were considered cumulatively. In this instance, a significant proportion of growth was suggested to the south of Harlow, although it was stressed that any such development or accompanying infrastructure should not breach the landscape ridge to the south. Fundamentally, this option did not comply with the Regional Spatial Strategy and therefore failed the test of conformity with that Strategy. It was therefore not considered a reasonable option.

10. Spatial Option D (“Regeneration-led”) considered the impact of growth around Harlow in terms of the regeneration benefits that could arise. A number of measures of deprivation were considered alongside the infrastructure requirements to deliver the proposed growth. The scale of growth to the south and west would require substantial improvements to the sewage treatment network, and there was a significant risk that these upgrades would not be delivered within the plan period. It was therefore not considered a reasonable option.

11. Spatial Option E (“Sustainable Transport-led”) was proposed on the basis of the available public transport network. In this instance no development was proposed to the south of Harlow, but significant development was proposed to the west. This was due to the proximity of this area to Roydon station. It was recognised, however, that substantial new transport infrastructure would be required both to the north and west of Harlow to ensure proper linkages to the existing town. Substantial development to the west may also require a

southern bypass to be reconsidered, therefore significantly increasing the investment that will be needed around the town. When this was considered in addition to improvements that will be required to the sewerage network, it was not considered that this option will be deliverable in the plan period, and was therefore not practical or reasonable.

12. Taking into account all of the information presented, a “hybrid” suggested spatial option has been put forward. This reflects the requirements of policy HA1 of the East of England Plan, and the limitations of likely infrastructure funding. Appendix 1 shows this hybrid option. It is important to note that this option is based on the information that is currently available. The figures included in this option should not be treated as absolute, but are a basis on which each of the three authorities can begin to prepare their Core Strategies. It is likely that the distribution of development around Harlow will continue to evolve as preparation of the Core Strategies progresses.

13. Policy HA1 creates considerable uncertainty over the eventual scale of development to the north of Harlow, although it stipulates that Development Plan Documents should plan for a development of “*at least 10,000 dwellings and possibly significantly more*”. A review of Green Belt boundaries will be required to deliver this growth, and as a result the consultants were asked to identify criteria to guide this review. These criteria will be used when considering the Green Belt boundary review, particularly in East Herts district to the north of Harlow, where such a review will help to shape the eventual size of the northern extension.

14. Finally, a “Plan-Monitor-Manage” framework has been suggested, which will allow the three authorities to implement and monitor the growth of Harlow in a coordinated manner. The adoption of such a framework as part of the Core Strategies and Annual Monitoring Reports of each authority will seek to address some of the issues raised in the recent report by the Planning Advisory Service (December 2009), where it was identified that more formal arrangements between the three authorities should be entered into.

Resource Implications:

There are no direct resource implications arising from the report itself. However, the need for formal coordinated working between the three District authorities, the two County Councils and other key stakeholders is likely to have an impact on resources in future.

Legal and Governance Implications:

Formal arrangements should be made between the relevant organisations to ensure that the growth of Harlow is delivered as required by the East of England Plan, in a manner which is considered acceptable to this authority.

Safer, Cleaner and Greener Implications:

None relevant at this time.

Consultation Undertaken:

The key stakeholders named in policy HA1 were consulted at regular intervals throughout the preparation of the study. The development industry was given an opportunity to input to the work by way of submission of pro-formas providing information on land holdings around Harlow.

Background Papers:

East of England Plan, May 2008

Impact Assessments:

Risk Management

There are risks associated with joint or co-ordinated working because of continuing lack of political support by East Herts for the RSS proposals for the north of Harlow. There is still considerable uncertainty about the precise manner in which the coalition Government will implement their intentions concerning the future of local planning. Officers will keep this matter under review, and ensure that Members are kept informed of progress.

Equality and Diversity:

Preparation of the Local Development Framework as a whole will be subject to an Equality Impact Assessment at a later date.

Did the initial assessment of the proposals contained in this report for relevance to the Council's general equality duties, reveal any potentially adverse equality implications? No

Where equality implications were identified through the initial assessment process, has a formal Equality Impact Assessment been undertaken? N/A

What equality implications were identified through the Equality Impact Assessment process?
N/A.

How have the equality implications identified through the Equality Impact Assessment been addressed in this report in order to avoid discrimination against any particular group?
N/A.

Appendix 1

Extract: Generating and Appraising Spatial Options for the Harlow Area – p51

Table 7: Comparison of Spatial Options A - E

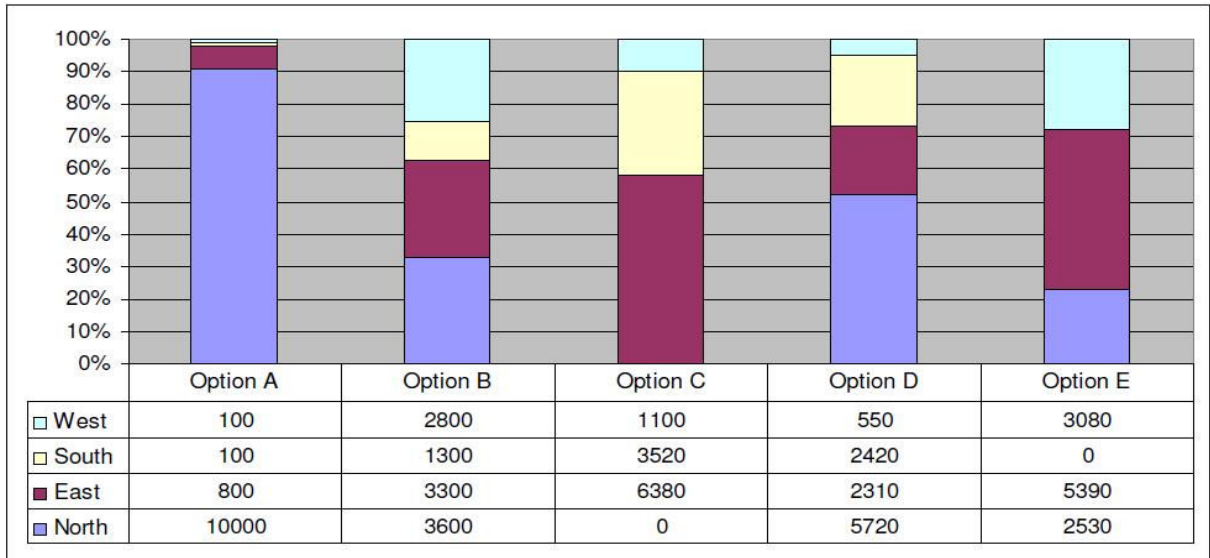
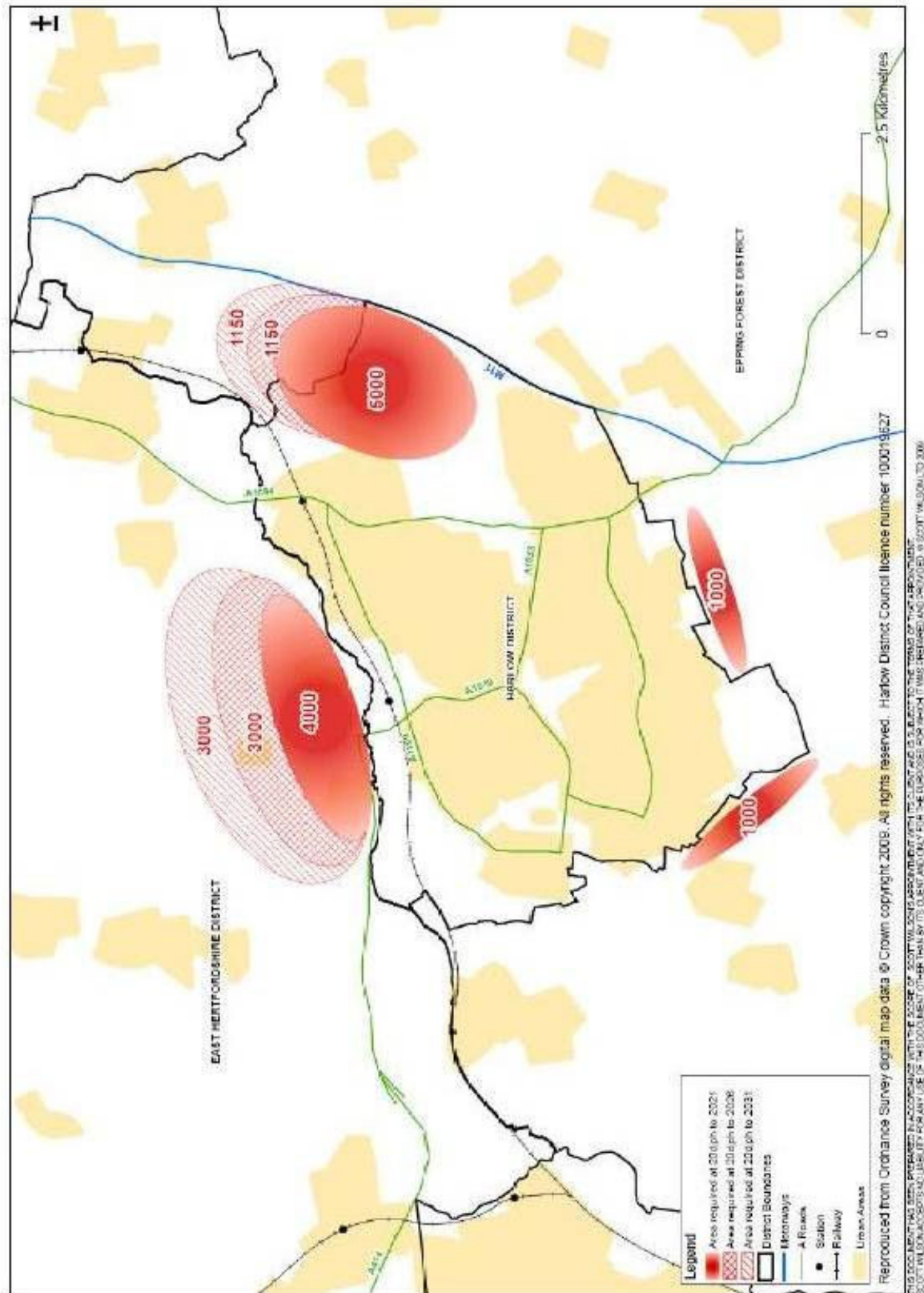


Figure 38: Suggested Spatial Approach for the Harlow Area to 2031



This page is intentionally left blank