

Report to the Local Development Framework Cabinet Committee



Report reference: *LDF-009-2009/10*
Date of meeting: *11 March 2010*

Epping Forest District Council

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 required 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.

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. There are no reasonable alternative options.

Report:

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

“...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:

- (a) to formulate a set of criteria to aid the identification of sustainable locations for regeneration and growth and new Green Belt areas;
- (b) to provide evidence of the spatial options for delivery of regeneration and growth in and around Harlow;
- (c) 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
- (d) 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:

- 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.
- 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.
- 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:

- (a) OS Meridian Urban Areas (i.e. the extent of urban development); employment areas;

- (b) national and local nature designations and;
- (c) areas designated as Flood Zone 3.

6. 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.

7. 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.

8. 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).

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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 several proforma providing information on land holdings around Harlow.

Background Papers:

East of England Plan, May 2008
Generating and Appraising Spatial Options for the Harlow Area – Scott Wilson, January 2010
(Main report including two Annexes)

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. These risks may increase if there is a change of Government at the May election as the Conservatives have indicated that they will abolish the regional tier of government and all housebuilding etc targets associated with it.

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

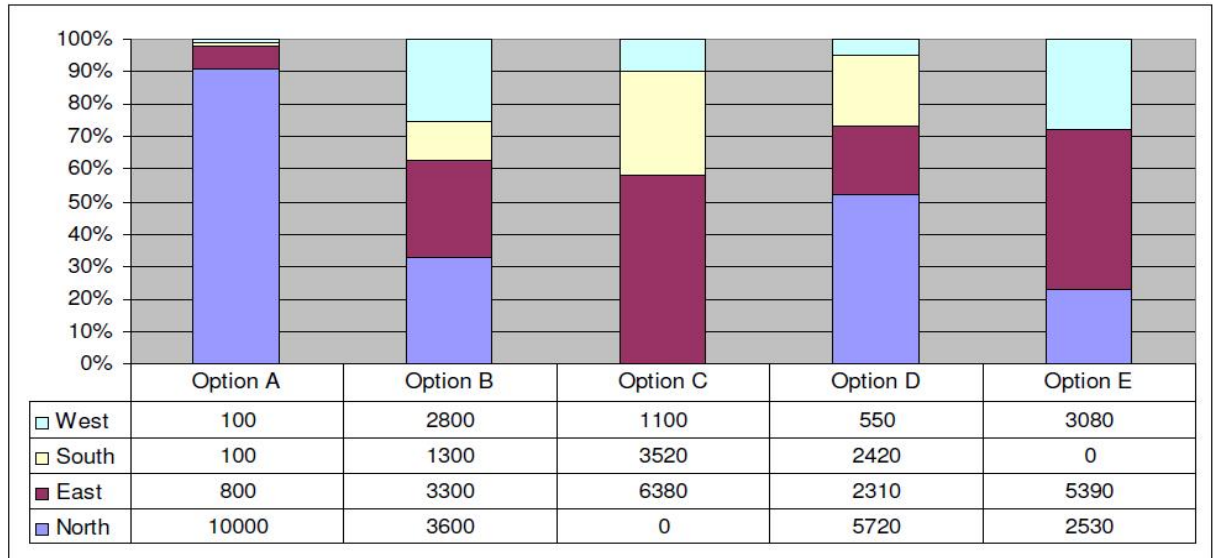
What equality implications were identified through the Equality Impact Assessment process?
N/A.

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



Extract: Generating and Appraising Spatial Options for the Harlow Area – p87

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

