

# Sustainability Appraisal (SA) for the Harlow Local Development Plan

Non-Technical Summary

Harlow Council

May 2018

## Quality information

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# 1. Introduction

- 1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Harlow Local Development Plan. Once adopted, will set out the framework to guide and shape development in Harlow to 2031, and will replace all of the saved policies of the Adopted Replacement Harlow Local Plan (2006). The Plan identifies sites for housing and employment. It also sets out the development management policies and infrastructure requirements against which planning applications will be determined.
- 1.2 The SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement and must be undertaken in-line with the European Union (EU) Strategic Environmental Assessment (SEA) Directive.
- 1.3 At the current time, a Draft Pre-Submission Version of the Local Plan is published for representations in-line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and an 'SA Report' is published alongside. The SA Report aims to inform consultation responses, and subsequent plan-making work (see the discussion of 'next steps', below).
- 1.4 This is a Non-Technical Summary (NTS) of the SA Report.

## Structure of the SA Report/this NTS

- 1.5 Sustainability Appraisal reporting essentially involves answering the following questions in turn:
  - 1) What has plan-making/SA involved up to this point?
    - Including consideration of 'reasonable alternatives'.
  - 2) What are the appraisal findings at this current stage?
    - i.e. in relation to the Submission Plan.
  - 3) What are the next steps?
- 1.6 Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering an initial question: *What's the scope of the SA?*

## What's the scope of the SA?

- 1.7 The scope of the SA is essentially reflected in a list of sustainability objectives, developed subsequent to a 'scoping' process (which included consultation on a Scoping Report in 2010<sup>1</sup>). Taken together, these objectives indicate the parameters of SA, and provide a methodological 'framework' for appraisal. It should be noted that the scoping information has been updated and presented within **Appendix II** of the main SA Report.

**Table 1: SA topics and objectives (i.e. the SA framework as broadly agreed in 2010)**

SA Topics	SA Objectives
Air quality	<ul style="list-style-type: none"> <li>To ensure that the Air Quality in Harlow remains below objective limits and continues to improve.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>To conserve and enhance biodiversity in Harlow.</li> <li>To promote, enhance and strategically expand the district's network of green infrastructure.</li> </ul>
Climate change (mitigation & adaptation)	<ul style="list-style-type: none"> <li>To lower Greenhouse Gas (GHG) emissions.</li> <li>To increase the amount of energy generated by decentralised or renewable sources and the use of renewable sources of energy by new development.</li> <li>To minimise the impact of development on surface water flooding and avoid development within areas of flood risk.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>To reduce poverty and social exclusion.</li> <li>To meet the health and social care needs of the district's growing and ageing population and its disabled population.</li> <li>To encourage healthy lifestyles and reduce inequalities in health, particularly through reducing obesity and diabetes.</li> <li>To reduce levels of crime, particularly Criminal Damage and Arson and Vehicle Offence crimes.</li> <li>To renew the district's deprived neighbourhoods and address poor public realm within and around residential areas to ensure that pedestrian routes are integrated with areas of activity.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>To reduce a mismatch between jobs and skills by improving levels of skills, training and qualifications within the district.</li> <li>To ensure that job creation is matched by the provision of appropriate facilities and infrastructure.</li> <li>To promote investment, develop an attractive employment base and create a diversified economy within the district through avoiding the dominance of a few large employers and encouraging the 'clustering' of businesses within existing locations.</li> <li>To regenerate the town centre through upgrading the level of retail provision, encouraging a broader mix of uses including residential, introducing a high quality public realm and restructuring centres to increase passing traffic and overcome accessibility issues.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>To protect the district's historic environmental assets from inappropriate development.</li> <li>To ensure that development respects the character, appearance and features of historical designations, in addition to the setting and views into or out of these areas.</li> <li>To ensure that the existing historic settlements and distinct settings of Churchgate Street and Old Harlow, and the new settlement of Newhall, retain their distinctive identity.</li> <li>To promote the creation of quality streets and spaces whilst protecting the town's distinctive character and heritage.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>To increase the provision of housing, particularly affordable housing, to ensure that appropriate levels of new dwellings are provided over the plan period.</li> <li>To diversify the housing stock, increase density and address poor public realm within and around residential areas.</li> <li>To ensure that the housing needs of an ageing (and disabled) population are met.</li> </ul>
Land and	<ul style="list-style-type: none"> <li>To support efficient use of land, including development of previously developed land</li> </ul>

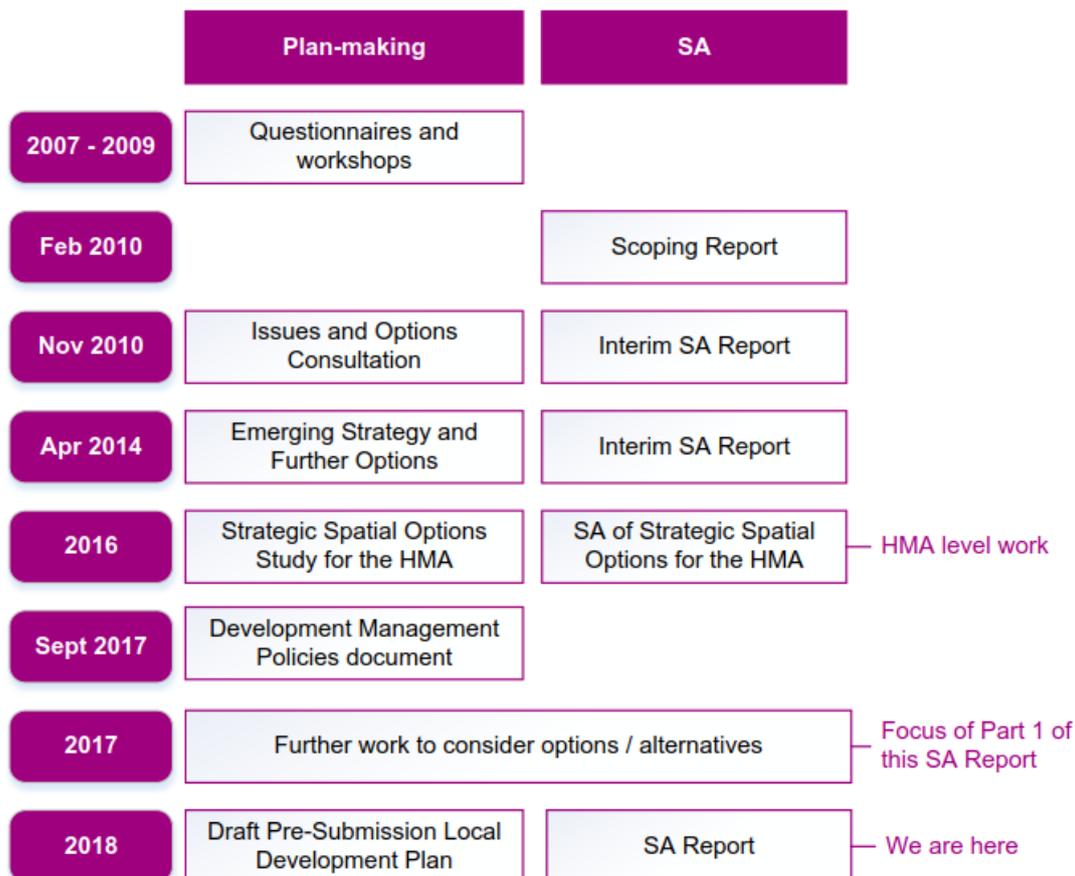
<sup>1</sup> Harlow Council (2010) SA and HRA Scoping Report. Prepared by Scott Wilson (now AECOM).  
<http://www.harlow.gov.uk/local-plan>

SA Topics	SA Objectives
waste	<p>in the district.</p> <ul style="list-style-type: none"> <li>To support the remediation of contaminated land.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>To ensure that development takes into account the Green Belt and Green Wedges that characterise the district.</li> <li>To ensure that the district's landscape assets are protected and integrated to maximise their potential amenity value, particularly in greenfield areas.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>To promote a more sustainable modal shift so that levels of private car use for commuting are reduced.</li> <li>To promote measures that integrate transport and land use planning in order to provide for the greatest possible increase in passenger transport uptake as well as implementing enhanced access to the M11 through a new junction.</li> </ul>
Water	<ul style="list-style-type: none"> <li>Given that Harlow is located in an area of serious water stress which will be exacerbated due to climate change and future growth and development, water efficiency measures should be sought, including through the promotion of SuDS.</li> <li>To encourage reduced per capita consumption of water and maintain high levels of drinking water quality.</li> <li>To maintain and improve the water quality of Harlow's water courses in line with the Water Framework Directive requirements.</li> <li>To ensure the distribution and location of new development takes the water supply and sewerage infrastructure into account.</li> </ul>

## 2. Plan-making/SA up to this point

- 2.1 An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.
- 2.2 Plan-making has been underway since 2007, with a number of consultations being held prior to this current stage under Regulation 19 of the Local Planning Regulations. **Figure 1** sets out the key steps to date for plan-making and the SA.

**Figure 1: Key steps in plan-making/SA process**



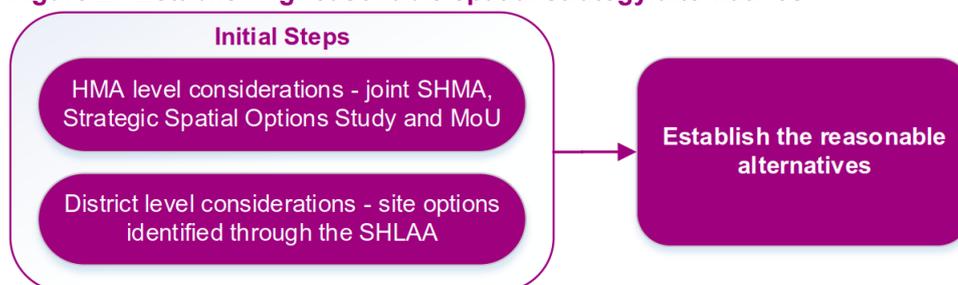
- 2.3 As illustrated in the Figure above, there have been a number of steps leading up to the publication of the Draft Pre-Submission Local Development Plan. Reasonable alternatives have been developed and considered through the SA at key stages where necessary.
- 2.4 To minimise complexity, the intention here is not to report on steps taken prior to 2016, despite it being the case that all work undertaken over the course of the plan-making/SA process has fed-in and helped to set the context for alternatives development.<sup>2</sup>
- 2.5 Part 1 of the SA Report therefore explains how work was undertaken to develop and appraise alternative approaches to housing growth (‘alternative spatial strategies’). Specifically, Part 1 of the report:
  - 1) Explains the process of establishing reasonable alternatives;
  - 2) Presents the appraisal of the reasonable alternatives; and
  - 3) Gives the Council’s response to the alternatives appraisal findings.

<sup>2</sup> Key steps include consultation on ‘Issues and Options’ in 2010 and the ‘Emerging Strategy and Further Options’ in 2010 which were both accompanied by Interim SA Reports.

## Establishing the reasonable alternatives

- 2.6 The aim here is to discuss the key steps undertaken in 2016 and 2017 that led to the development of reasonable alternatives for appraisal and then consultation in 2018. This section explains how reasonable alternatives were established subsequent to certain initial steps - see **Figure 2**.

**Figure 2: Establishing reasonable spatial strategy alternatives**



- 2.7 We firstly discuss the initial steps in turn, and then conclude by explaining how the evidence-base was drawn on to establish District-wide reasonable alternatives for appraisal in 2017.

## Housing Market Area (HMA) level considerations

- 2.8 A three step approach was taken, which ultimately resulted in the establishment of a preferred broad spatial strategy for the West Essex and East Hertfordshire HMA, including a decision on the approach to growth in and around Harlow. Harlow was recognised as the most sustainable location within the HMA to focus residential development given its role as a sub-regional centre for employment, its Enterprise Zone status; its important location on the London Stansted Cambridge corridor and the wider economic growth aspirations for the town.

### Step 1 - Establish an understanding of housing and economic needs

- 2.9 A Joint Strategic Housing Market Assessment (SHMA) for the HMA was published in September 2015.<sup>3</sup> This evidence base document determined the objectively assessed housing need for Epping, East Herts, Harlow and Uttlesford District Councils. It should be noted that further work was carried out in August 2016 and more recently July 2017 based on an assessment undertaken after the publication of the latest 2016 population and household projections. The July 2017 assessment identified the full objectively assessed need for the SHMA as approximately 51,700 new homes. The updated information is considered later in this NTS as part of the story of how District-wide reasonable alternatives were developed in 2017.

### Step 2 - Develop and appraise spatial alternatives

- 2.10 In 2016, Epping Forest, East Herts, Harlow and Uttlesford District Councils commissioned a Strategic Spatial Options Study to identify options for distributing the housing need identified in the SHMA above and to inform the development of a Memorandum of Understanding (MoU) on the distribution of housing. The study identified the following reasonable strategic spatial options:
- Spatial options to deliver ~46,100 new homes across the SHMA area:
    - A. Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)
    - B. Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)

<sup>3</sup> Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings [www.efdclocalplan.org/technical-information/](http://www.efdclocalplan.org/technical-information/)

- C. Less development at Harlow and two new settlements in East Herts (NB ~10,500 at Harlow)
- D. Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA<sup>4</sup>)
- Spatial option to deliver ~49,638 new homes:
  - E. Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)
- Spatial option to deliver ~57,400 new homes:
  - F. Maximum growth across the HMA (NB ~ 20,985 at Harlow)

### Step 3 - Identify the preferred strategy for the HMA

- 2.11 The implications of the six options (A-F) were investigated through four means:
1. Transport modelling by Essex County Council to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure;<sup>5</sup>
  2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water;<sup>6</sup>
  3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation in particular; and
  4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.<sup>7</sup>
- 2.12 In light of this investigation, the Co-op Member Board identified a Preferred Spatial Option to deliver around 51,100 new homes across the HMA for the plan period to 2033 set out in **Table 2** below.

**Table 2: The preferred broad strategy for the HMA**

Local Authority	Net new dwellings 2011-2033
East Hertfordshire District Council	approx 18,000
Epping Forest District Council	approx 11,400
<b>Harlow District Council</b>	<b>approx 9,200</b> (N.B. this target is higher than the identified OAHN at the time)
Uttlesford District Council	approx 12,500
<b>Total across the HMA</b>	<b>approx 51,100</b>
...of which the area in and around Harlow <sup>8</sup> will provide	approx 16,100

### Updated evidence

- 2.13 A further SHMA update was carried out in 2017 taking into consideration the latest relevant evidence including DCGL's 2014 based household projections (July 2016). These updates led to a revised OAHN for the HMA of 51,710 dwellings from a previous figure of 46,100 while the need for affordable housing remained largely unchanged from the 2015 SHMA.

<sup>4</sup> Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion; Duty to Cooperate developments at East of Stevenage and East of Welwyn unchanged.

<sup>5</sup> Essex County Council. West Essex and East Hertfordshire Local Plan Modelling. Technical Notes 1 to 6.

<sup>6</sup> Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

<sup>7</sup> East Herts, Epping Forest, Harlow and Uttlesford District Councils (2016) Harlow Strategic Site Assessment Report.

<sup>8</sup> 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

- 2.14 The latest updates identified a slightly increased OAHN for three of the four local authorities in the HMA. However, as the increase had been largely anticipated and accounted for in the HMA level work and preferred strategy, the updated overall housing need across the entire HMA remained broadly consistent with what had already been agreed (signed Memorandum of Understanding, March 2017). 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...”
- 2.15 It was not considered necessary to revisit alternatives for the level and distribution of growth for the HMA as set out in the signed MoU (March 2017). The SA of Strategic Spatial Options published in 2016 considered three alternatives for the overall level of growth in the HMA, which included the delivery of ~ 46,000, ~ 49,638 and ~ 57,400 new homes within the HMA.<sup>9</sup> As such, higher numbers including figures approximating to and in excess of 51,710 new dwellings had already been tested and so there was no need to revisit the HMA-level optioneering work.
- 2.16 As a result, the HMA authorities are satisfied that the approach set out within the MoU will ensure that the predicted housing need of the HMA will be met over the course of the Local Plan periods.<sup>10</sup> Harlow Council’s housing requirement therefore remains 9,200 dwellings as set out within the signed MoU (March 2017).

## District level considerations

### Overview

- 2.17 The HMA work discussed above resulted in an understanding of the preferred strategic sites within and surrounding Harlow, and resulted in an understanding of the housing requirement which would need to be delivered through other sites within Harlow. There remained a need to develop a District-wide understanding of the site options available to deliver the remaining housing requirement.

### Housing sites

- 2.18 To inform the preparation of the Local Development Plan the Council carried out a Strategic Housing and Land Availability Assessment (SHLAA) to identify opportunities to meet the town's housing need and provide information about the deliverability of potential sites. The SHLAA was published in 2014 and **Figure 3** below shows the sites that were identified and considered through that assessment.

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<sup>9</sup> Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

<sup>10</sup> It should be noted that Uttlesford District Council published a Regulation 18 Local Plan for consultation in July 2017, which includes a housing target of 14,100 dwellings.

**Figure 3: Sites identified and considered through the SHLAA process**

- 2.19 The method and detailed findings of the SHLAA are available on the Council's website.<sup>11</sup> It is important to note that a significant number of sites identified and assessed through the SHLAA process are in public ownership. As explained in the SHLAA Report (2014), "*This is the legacy from the New Town era where land and buildings were extensively owned by the Harlow Development and then Commission for New Towns and Homes and Communities Agency. Much of the land and buildings were transferred into Council Ownership. In addition Essex County Council has put forward land in its ownership*".
- 2.20 At the time the SHLAA (2014) found that the potential dwelling supply in Harlow was 8,886 dwellings, which included new sites (2,307 dwellings) commitments (4,027 dwellings), completions (541 dwellings from 01/04/11 to 31/03/13) and potential development that could be delivered at the strategic broad location in the east 2,011 dwellings).
- 2.21 All of the sites identified and considered through the SHLAA were appraised through the SA process. The findings of this work are presented in **Appendix III** of the main SA Report.
- 2.22 Since the publication of the SHLAA the call for sites has remained opened and the Council has continued to monitor and update the evidence relating to land availability and housing supply (see below). For further information on the Council's site selection process please refer to **Appendix III** of the main SA Report.

## Housing Requirement

- 2.23 The most recent SHMA update (July 2017) identified that Harlow has an OAHN of 7,409 dwellings. The Local Plan must ensure there is a sufficient supply of market, affordable and specialist dwellings to meet this need. To contribute to the substantial need for affordable housing need across the HMA<sup>12</sup> and aspirations for regeneration in Harlow<sup>13</sup>, an additional 1,800 dwellings are also to be delivered as agreed through the signed MoU in March 2017. This gives a total housing requirement for Harlow of 9,200 dwellings.

<sup>11</sup> Harlow Council (2014) Strategic Housing and Land Availability Assessment.

<sup>12</sup> Opinion Research Services (July 2017) West Essex and East Hertfordshire Strategic Housing Market Assessment: Affordable Housing Update.

<sup>13</sup> Harlow Council (2013) Harlow Future Prospects Study: Linking Regeneration & Growth.

- 2.24 Since the start of the Local Development Plan period (1st April 2011), 5,558 dwellings have been completed and/or granted planning permission, a significant contribution towards meeting this housing requirement. This leaves an additional requirement of 1,042 dwellings to be delivered, as shown in **Table 3** below.

**Table 3: Housing Supply**

	Dwellings
Completions at 31 March 2017	1,436
Commitments at 31 March 2017	4,122
Strategic Housing Site East of Harlow	2,600
Additional Requirement	1,042
<b>Total</b>	<b>9,200</b>

- 2.25 It should be noted that whilst there has been a steady supply of windfall sites, their contribution to the overall housing supply has not been significant. The New Town legacy of Harlow means the District has been carefully planned from the outset; consequently there are very few opportunities for windfall sites. The Council therefore considered that the windfall supply in Harlow would not meet the national criteria and consequently could not be included as a reliable source of supply in the five year supply calculations.

## Establishing reasonable alternatives

- 2.26 In trying to establish reasonable alternatives for delivering the remaining housing requirement of 1,042 dwellings, it is important to remember that Harlow is not typical of most Districts. It is a former New Town with a planned layout which has been developed from a Master Plan. The consequence of this is that land was identified with some form of specific function.
- 2.27 The Master Plan sought to preserve the form of the original landscape and the natural features that gave the District its distinctive character; consequently the green areas were generally kept free of buildings and as natural as possible. Almost half of the land in Harlow is a form of open space, much of which is multi-functional, with 28% being designated as Green Wedges or Green Fingers, and 10% as Green Belt. These Green Wedges and Green Fingers are fundamental parts of the green infrastructure, as they contain multi-functional open spaces which are linked to other open spaces and the wider countryside.
- 2.28 Harlow's unique character created from key master planning principles has resulted in a strong relationship between the urban form and the Green Wedge network, through which transport corridors pass. The Green Wedges provide a series of connectable open spaces which link major facilities and services, offering a pleasant and attractive footpath, cycleway and bridleway system.
- 2.29 The District boundary reflects the original New Town designated area and, as such, is tightly drawn around the urban area. This means that, unlike many other Councils, Harlow does not have a large hinterland or neighbouring settlements in which to search for potential housing sites.
- 2.30 Through the site selection process (see **Appendix III**) the Council identified twenty one available and suitable sites that could deliver around 1,147 new dwellings. The majority of these sites are previously developed land (PDL) with only three available and suitable open space sites identified with a capacity to deliver around 63 new dwellings. It should be noted that the three open space sites are identified as being of low value and quality through the Harlow Open Space and Green Infrastructure Study (2013).<sup>14</sup>
- 2.31 As set out above, the District boundary is tightly drawn around the urban area, reflecting the original New Town designated area. This means that there are limited opportunities for development on greenfield sites on the edge of the town and within the District's boundary.

<sup>14</sup> Harlow Council (2013) Open Space and Green Infrastructure Study. Prepared by LUC.

This leaves the Green Wedges, Green Fingers and other areas of open space which are fundamental to the drainage network, green infrastructure and unique character of Harlow. Taking all these factors into account, no other available, suitable or deliverable sites were identified through plan-making that could provide further capacity and feed into the development of reasonable alternatives for meeting the additional housing requirement of 1,042 dwellings.

- 2.32 In line with the NPPF and given the importance of the open spaces within Harlow, any alternative should seek to maximise the use of PDL to meet the remaining housing requirement of 1,042 dwellings. It was therefore considered reasonable that alternatives for the additional housing requirement should focus on this issue by exploring increased densities on PDL.
- 2.33 It was determined by the Council that increased densities would be most appropriate for PDL sites that are:
- located within or in close proximity to the town centre where high density schemes may be more suitable utilising existing facilities and public transport in the town centre;
  - located within close proximity to future public transport nodes likely to come forward as part of the sustainable transport corridor work; and/or
  - located within the District's Hatches<sup>15</sup> where higher density would stimulate regeneration due to their close proximity to public transport.
- 2.34 For those PDL sites meeting the criteria above both a moderate and high density option were explored. The Council calculated the alternative densities so that they would reflect similar applications at town centre/neighbourhood centre sites within Harlow as well as the sustainability of the sites in terms of access to public transport and facilities/services.
- 2.35 Based on the above, three reasonable alternatives were identified to meet the additional housing requirement of 1,042 dwellings and these are set out in **Table 4** below.

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<sup>15</sup> Hatches sit below the town centre and district centres in the retail hierarchy. They serve specific local needs and provide for a range of community services.

**Table 4: The reasonable alternatives**

Ref	Location	Justification for increase in density	Site Size (ha)	Option A Preferred Approach		Option B Moderate density on certain PDL sites		Option C High density on certain PDL sites	
				Density (dph)	Capacity	Density (dph)	Capacity	Density (dph)	Capacity
1	Princess Alexandra Hospital	Close to town centre	14	43	650	120	1400	200	2800
2	Stow Service Bays		0.5	196	70	196	70	196	70
3	Land east of Katherines Way, west of Deer Park		2.37	30	69	30	69	30	69
4	Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery		0.93	45	42	45	42	45	42
5	Land south of Clifton Hatch		1	36	36	36	36	36	36
6	Riddings Lane	Close to sustainable transport corridor node	1.56	22	35	40	62	120	187
7	Kingsmoor Recreation Centre		0.8	44	35	44	35	44	35
8	The Evangelical Lutheran Church, Tawneys Road		0.18	195	35	195	35	195	35
9	Land east of 144-154 Fennells		0.81	28	23	28	23	28	23
10	Pollard Hatch plus garages and adjacent land	Hatch regeneration scheme	0.44	45	20	65	31	100	44
11	Land between Second Ave and St. Andrews Meadow		0.42	38	16	38	16	38	16
12	Coppice Hatch and garages	Hatch regeneration scheme	0.34	47	16	65	22	100	34
13	Sherards House		0.47	32	15	32	15	32	15
14	Elm Hatch and public house	Hatch regeneration scheme	0.2	65	13	65	13	100	20
15	Playground west of 93 - 100 Jocelyns		0.39	30	12	30	12	30	12
16	Fishers hatch	Hatch regeneration scheme	0.19	52	10	65	12	100	19
17	Slacksbury Hatch and associated garages	Hatch regeneration scheme	0.24	41	10	65	16	100	24
18	Garage blocks adjacent to Nicholls Tower		0.34	29	10	29	10	29	10
19	Stewards Farm		0.5	20	10	20	10	20	10
20	Land between Barn Mead and Five Acres		0.32	31	10	31	10	31	10
21	Pypers Hatch	Hatch regeneration scheme	0.19	54	10	65	12	100	19
<b>TOTAL DWELLINGS</b>				<b>Option A 1,147</b>		<b>Option B 1,951</b>		<b>Option C 3,530</b>	

## Summary alternatives appraisal findings

- 2.36 Summary appraisal findings are presented within **Table 5**. Within each row (i.e. for each of the topics that comprise the SA framework, including equalities) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using **red / green**) and also rank the alternatives in relative order of performance. Also, ‘=’ is used to denote instances where the alternatives perform on a par (i.e. it is not possible to differentiate between them). A star is used to highlight the option or options that are preferred from an SA perspective.

**Table 5: Summary spatial strategy alternatives appraisal findings**

Summary findings and conclusions						
Topic	Categorisation and rank					
	Option A Preferred approach		Option B Moderate density on certain PDL sites		Option C High density on certain PDL sites	
	Rank	Significant effect?	Rank	Significant effect?	Rank	Significant effect?
Air quality	1	No	2	No	3	?
Biodiversity and green infrastructure	=	No	=	No	=	No
Climate change	1	No	2	No	3	?
Community and wellbeing	=	Yes	=	Yes	=	Yes
Economy and employment	2	No	2	No	1	No
Historic environment	1	No	2	No	3	?
Housing	2	Yes	2	Yes	1	Yes
Land and waste	=	No	=	No	=	No
Landscape	1	No	2	No	3	?
Transport	1	No	2	No	3	?
Water	=	No	=	No	=	No

- 2.37 There are no differences between the options in terms of the spatial distribution/location of development. Options B and C propose a higher housing density at eight brownfield sites that are close to the town centre, the District’s Hatches and/or potential sustainable transport corridor nodes. The appraisal therefore focused in particular on the issues of increased density at eight of the proposed sites as well as the resulting overall increase in growth for the District as a whole. In terms of the overall level of growth, Option A would deliver 1,147 dwellings; Option B 1,951 dwellings and Option C 3,530 dwellings during the life of the Plan.
- 2.38 The SA found that there are both positive and negative aspects of delivering increased densities at the eight brownfield sites identified. The additional housing growth could further assist regeneration through enhanced improvements to community infrastructure and the public

- realm as a result of increased Section 106 contributions. Furthermore, increased contributions could also contribute to enhanced management of existing green infrastructure. It is important to note that there is a significant level of uncertainty at this stage.
- 2.39 The increased density is also positive in terms of the housing topic as there is the potential to deliver a greater number of new homes within Harlow and allow for more flexibility should some sites not come forward or their capacity be less than expected. However, there is the potential that the increased densities could make it more difficult deliver a suitable mix of market and affordable homes, in particular family homes. It is also possible that the contributions required to deliver the necessary infrastructure to support the increased levels of development and mitigate for potential impacts (explored below) could affect the viability of these eight brownfield sites. As mentioned above, there is a significant level of uncertainty at this stage.
- 2.40 The appraisal found that Option C is preferred in relation to the housing and economy topics given the increased level of growth. The difference in the overall level of growth between Options A and B is less significant so they are ranked similarly against these topics.
- 2.41 The appraisal found that Option B and in particular Option C performed less well against SA topics relating to the historic environment and landscape. For the purposes of the appraisal it was assumed that the increased density proposed through Option B and in particular Option C would result in a built form that is generally higher than the surrounding areas. This could have long term negative effects on the character of these areas and therefore the townscape and historic environment. The appraisal identified this as a particular issue for the Princess Alexandra Hospital (HS2-1) and Elm Hatch and Public House (HS2-14) sites given the presence of designated heritage assets, including a Conservation Area, Scheduled Monuments and Listed Buildings. The increased density could also reduce the level of open/green space being delivered on the eight brownfield sites. As highlighted earlier in this SA Report, areas of open/green space are fundamental to the character of the town.
- 2.42 While increased Section 106 contributions as a result of a higher level of growth could possibly deliver enhanced improvements to the historic environment, townscape and existing green infrastructure this is uncertain at this stage. Ultimately the nature and significance of effects in relation to the landscape and historic environment are uncertain as they will be dependent on the precise design and layout of development as well as mitigation measures delivered. The appraisal found that Option A is preferred in relation to landscape and the historic environment.
- 2.43 Option A seeks to deliver the preferred approach agreed through the MoU (March 2017) for the distribution of housing growth across the HMA. There is also a signed MoU (February 2017) committing the relevant stakeholders, including Harlow District Council, to deliver the necessary transport infrastructure improvements to deliver the agreed level of growth across the HMA. Taking this into account the appraisal found that Option A would not result in a significant negative effect on SA topics relating to transport, air quality and climate change. Option B would result in an increase of 804 dwellings and Option C an increase of 2,383 dwellings compared to Option A. While Option B is likely to have a greater impact on traffic compared to Option A, the appraisal considered that this is likely to be minimal and not of significance in terms of differentiating between them. The level of growth proposed through Option C is more likely to substantially increase the levels of traffic. At this stage it is not known if further improvements to transport infrastructure are possible and could be delivered to accommodate the associated increase in traffic with Option C.
- 2.44 The appraisal also noted that there were positive aspects to Options B and C as they propose further growth close to the town centre, local centres (Hatches) as well as sustainable transport corridor nodes. This could help to reduce reliance on the private vehicle and encourage a modal shift; however, again this is uncertain at this stage.

## The Council's response/justification for the preferred approach

- 2.45 The Council has identified its preferred spatial approach for housing and employment allocations based on various technical documents and discussions with stakeholders and developers. Housing sites were allocated based on a detailed site selection process as set out in the Council's Strategic Housing Land Availability Assessment (SHLAA) 2014 having considered existing constraints, the deliverability and developability of sites and the original Master Plan for Harlow as prepared by Sir Frederick Gibberd.
- 2.46 The original Master Plan for Harlow, the town's tight administrative boundaries and other environmental constraints including the River Stort and topography mean that the number of site options and therefore spatial alternatives for housing is limited. The site selection process for the SHLAA identified 369 potential development sites but after a sieving process this reduced to 59 developable sites. These sites include greenfield land identified for release from the Green Wedge network and Green Belt as recommended in associated evidence base studies. The preferred approach has resulted in a mix of small, medium and large sites dispersed across the town and includes greenfield land and brownfield land as well as sites identified for regeneration. It also includes a large strategic housing site proposed for Green Belt release which will provide approximately 2,600 homes. This site will help achieve the critical mass needed to regenerate the town and support strategic infrastructure requirements.
- 2.47 The Council considered the potential for developing further greenfield land, namely parts of the Green Wedge network. However, this would have significant consequences on the role and function of the green infrastructure network of Harlow, impacting on the availability of open space for Harlow residents and detracting from the purposes of the original Master Plan for Harlow. The Council has considered increasing densities across particular sites as set out in Table 4 of this NTS as the only reasonable alternative to the preferred approach. These alternative scenarios would increase densities at sites close to sustainable transport nodes, on sites close to the town centre due to access to services and facilities and at hatches where additional housing could support regeneration. It must be noted that the SHLAA process has already applied higher densities to such sites albeit on a lower scale (justification for this approach is outlined in the 2014 SHLAA document).
- 2.48 Increasing densities would increase the housing supply across Harlow and the HMA as a whole; however, the local plan is already providing more homes than the OAHN in order to bring forward regeneration opportunities and affordable housing provision. Increasing densities on the sites identified in Table 5.3, either through Options B or C, would have the following negative effects for Harlow:
1. In order to achieve higher densities, developments would have to build flatted schemes due to land capacity constraints. It is evident from planning applications, appeal decisions and viability evidence prepared for the Local Plan that most flatted schemes in Harlow are unable to provide affordable housing (a significant issue in Harlow as set out in the SHMA) and planning contributions towards infrastructure.
  2. Without the provision of planning contributions towards infrastructure, the Council is unable to bring forward improvements to the public transport network, the provision of education and healthcare facilities and other important services to make Harlow a sustainable place. It will place pressure on existing infrastructure provision in Harlow.
  3. Most sites are located in existing built-up areas within close proximity of homes. Flatted schemes, particularly high-rise which are needed to achieve Option C densities, are likely to have significant impacts on the amenity of residents and amenity of the topography and landscape of Harlow and countryside surrounding Harlow. It will also impact on the design and layout of existing streets in Harlow in contrary to the original Master Plan for the town.
- 2.49 The Council's future employment needs will continue to be delivered on existing employment sites and through the Enterprise Zone sites which are still considered to be the most sustainable locations having regard to the availability of land and the need for other facilities

and services and housing. The Council will continue to seek measures to maximise employment land in existing sites and retain employment provision.

- 2.50 It is considered that the preferred approach acknowledges the existing constraints in Harlow, the original Master Plan for the town and the role and function of the land within it. It provides opportunities for regeneration and greenfield development and considers the viability of sites to deliver affordable housing and infrastructure. It also provides the correct level and spatial distribution of growth to bring about transformational change to Harlow, enhance its role as a strategic hub within the London Stansted Cambridge Corridor and deliver sustainable growth supported by the correct levels of infrastructure. The preferred approach is also in line with the signed MoU for the distribution of OAHN across the West Essex and East Hertfordshire HMA.

## 3. Appraisal findings at this stage

- 3.1 Part 2 of the SA Report answers the question - *What are appraisal findings at this stage?* - by presenting an appraisal of the Submission Plan. Appraisal findings are presented under thirteen 'sustainability objective' headings (see Table 1, above), and summary findings are presented below. Where necessary, the appraisal narrative below identifies the nature (positive, negative or neutral) and significance (significant or minor) of effects.

### Air quality

- 3.2 Air quality in Harlow currently meets the national Air Quality Objectives, and as such, Harlow Council does not have an Air Quality Strategy or Action Plan. However, through the Draft Plan, the Council prioritises a clean and green environment, adopting a number of policies which are focused on reducing the District's carbon footprint and improving air quality.
- 3.3 It is likely that significant new developments in the Harlow area will result in traffic growth within Harlow and along key transport corridors, in particular the M11 and A414. The Plan aims to safeguard the environment from harmful development that may affect air quality through strategic level master planning for the Garden Town Communities. Measures to be implemented include the proposal for a new junction 7a on the M11, which is anticipated to reduce the anticipated strain on the local and wider road network, creating a significant change to how vehicles would access Harlow. A number of preliminary traffic options have also been identified through the Plan to reduce the volume of vehicles on the road, including preventing HGVs using smaller residential roads moving to priority routes.
- 3.4 In the context of Epping Forest SAC, the HRA (2017) considers that the Plan's firm commitment to the development of mitigation strategies to address air quality around Epping Forest, the commencement of work on those solutions, the agreement to a deadline for devising those strategies, and the authorities' (West Essex and East Hertfordshire HMA Local Authorities, Essex and Hertfordshire County Councils, City of London Corporation and Natural England) commitment to monitor the efficacy of those strategies provides a sufficient framework to ensure no adverse effect will arise from air quality on the integrity of the SAC.
- 3.5 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline. It is recognised that the updating of traffic and air quality modelling and the testing and securing of specific mitigation measures will clearly be an iterative process.

### Biodiversity and green infrastructure

- 3.6 The HRA process concluded that the development proposed through the Draft Plan will not have an adverse effect on any European sites, either alone or in combination. This conclusion is dependent on a number of recommendations, including the recommendation that the Local Plan also provide explicit policy reference to the strategic framework in place to address air quality at Epping Forest, including specific reference to a multi-authority mitigation strategy and a timetable for the production of that strategy (e.g. prior to adoption). This will enable the Council to make contributions to the strategic mitigation that is proportionate to the Plans atmospheric pollution contributions.
- 3.7 The Draft Plan proposes a number of allocations that are in close proximity to a SSSI (or fall within Impact Risk Zones for a SSSI), Ancient Woodland and/or Local Wildlife Site. The appraisal concluded that given the sensitivities of the designated sites, scale of proposed growth and mitigation provided through Draft Plan policies as well as the development management process that there will not be any significant effects either alone or cumulatively.
- 3.8 The loss of greenfield land in the East of the District and surrounding Harlow through the delivery of the Garden Town Communities, in Epping Forest and East Herts, has the potential for a cumulative negative effect on biodiversity through habitat loss and fragmentation. Policies within the Draft Plan seek to ensure Green Wedges, and the wider Green Infrastructure

Network continues to provide ecological corridors for wildlife, which helps to reduce the significance of the effect to a certain extent. It will be important for a connected Green Infrastructure network that runs through Harlow as well as the surrounding Garden Town Communities. The Council will work with Natural England, The Essex Wildlife Trust, The Biological Records Centre, Essex County Council and other bodies to conserve, enhance, protect and manage the network of Green Wedges and Green Fingers, which are key physical features of Harlow that have shaped its subsequent growth.

- 3.9 It is recognised that there is the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations. However, on balance it is appropriate to conclude **uncertain long term minor negative effects** at this stage.

## Climate change (mitigation and adaptation)

- 3.10 Whilst housing growth in itself does not give rise to concerns regarding climate change mitigation, there is a need to minimise per capita emissions. This means distributing housing to locations where car dependency and the need to travel long distances by car are minimised (with 'modal shift' support), and supporting larger, strategic-scale development schemes that give rise to the greatest opportunity to design-in low carbon infrastructure. In both respects the preferred spatial strategy performs well, and policies are set in place to encourage sustainable travel, promote growth in sustainable locations, and encourage best practice in building design that will promote energy conservation. Nonetheless, there is always the potential to 'go further', and climate change mitigation should be a focus of ongoing work (e.g. to ensure that adjacent development sites coordinate efforts).
- 3.11 In terms of climate change adaptation, the development management policies seek to ensure that water management; flooding and sustainable drainage is fully considered as part of new development proposals. While the presence of the River Stort does give rise to concerns, to minimise the issue, the Plan requires that new development is directed to areas of lowest flood risk. Additionally, where sites are at risk of flooding, the most vulnerable parts of the proposed development must be located in areas of lowest flood risk. It is recognised throughout the Plan that surface water flooding is also a constraint for the District, and as such development proposals must be flood resilient and resistant, with safe access and escape routes, and it should also be demonstrated that residual risks can be safely managed. The Plan also requires the implementation of integrated and maintainable SuDS in new development that achieves multiple flood risk benefits.
- 3.12 On balance, it is appropriate to conclude **neutral effects** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.<sup>16</sup>

## Community and wellbeing

- 3.13 Delivery of the Draft Plan will help to meet the housing, and employment requirements of existing and new communities within the District and the HMA. The urban expansion of Harlow will benefit residents through providing improved infrastructure, facilities, and services across the District, as set out within the IDP (2017). This will contribute towards the development of sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all. Further to this, the regeneration of Harlow will address Harlow's health and wealth inequalities, as well as potentially have a positive effect on the District's neighbourhoods by reducing localised deprivation.
- 3.14 Site specific and District-wide policies are proposed that provide a variety of measures to ensure that the negative impacts of growth on the communities are minimised, and potential opportunities are realised. The Draft Plan seeks to ensure that there is sufficient access to the District's Green Infrastructure network, with particular focus on retaining the network of Green Wedges which have shaped Harlow's growth. Additionally, policies are co-ordinated to ensure the maximum increase in sustainable transport use, to ensure ease of movement and

<sup>16</sup> In relation to climate change mitigation, there is very little potential to conclude that a Draft Plan will result in significant effects, recognising the climate change mitigation is a global issue.

accessibility to all. On balance, it is appropriate to conclude that the Plan would have **long term significant positive effects** on communities and wellbeing.

## Economy and Employment

- 3.15 The Draft Plan allocates land to support housing and employment growth at Harlow, and within the Harlow environs, to help ensure that sub-regional economic growth objectives are realised. Additional housebuilding and related infrastructure development will boost employment opportunities across a range of sectors that will support the local employment base, and create new jobs in new and growing sectors.
- 3.16 The Economic Development and Prosperity Strategy is reflected through the Draft Plan, proposing new development in strategic employment areas to revitalise the District, utilising its location along the M11 transport corridor. The Draft Plan has identified sufficient land to meet identified employment needs through the delivery of the Enterprise Zone and through undeveloped sites at Templefields and the Pinnacles. These sites are expected to satisfy the demand for growth sectors in the Harlow and Gilston Garden Town, assisting in the integration of new employment.
- 3.17 Policies within the Draft Plan ensure the retail hierarchy is followed, and that existing employment space is protected. The Plan also places focus on developing a visitor economy for Harlow supporting the provision of and improvement to existing leisure and recreational attractions; including the River Stort, Harlow Town Park and Harlow Museum. The development of the visitor economy in the town centre and the provision of hotel accommodation, building links to Stanstead Airport and London, will boost tourism in the District, having a positive effect on economic growth. On balance, it is appropriate to conclude that the Draft Plan would have **long term significant positive effects** on economy and employment.

## Historic environment

- 3.18 The majority of growth proposed through the Draft Plan is either completed and/ or committed development. The East of Harlow allocation is the largest proposed development and will deliver around 2,600 new dwellings and associated infrastructure in close proximity to a number of designated heritage assets. The loss of greenfield and agricultural land will change the character of the area and is likely to have a negative effect on the historic environment.
- 3.19 The majority of the remaining housing requirement is being met through the regeneration of previously developed land within the town. This has the potential for a positive effect on the historic environment through the regeneration of areas/ buildings that are currently detracting from the townscape and historic environment; however, this is uncertain at this stage. A small amount of development is proposed on open space sites within and on the edge of the town. The majority of these are small scale and unlikely to result in a significant negative effect on the historic environment.
- 3.20 Development proposed in the East of the District through the Harlow Draft Plan and in the surrounding area through the Epping Forest and East Herts Draft Plans to deliver the Garden Town Communities have the potential for a cumulative negative effect on the historic environment. The loss of greenfield and agricultural land will have impacts on the character of the wider historic environment and affect the setting of a number of designated heritage assets. Historic England highlighted the importance in trying to retain the character of the areas surrounding Harlow through the HMA level Strategic Spatial Options Study
- 3.21 The Draft Plan seeks to minimise impacts on the historic environment through a number of policies. This includes Policies WE4 (Heritage) and PL11 (Heritage Assets and their Settings) which establish the framework for the protection and proactive conservation of heritage assets. They seek to conserve and enhance the unique built environment, recognising that there are parts of the historic environment which contribute strongly to the character and distinctiveness of places, bringing wider social, cultural, economic and environmental benefits to local communities and providing enjoyment to the wider public.

- 3.22 Development that affects a heritage asset or its setting will also be assessed based on the effects caused by the development on the significance of the heritage assets, with some proposals requiring the implementation of an appropriate management plan. Development will be supported where it includes high quality design that respects the character and appearance of the local area; and having regard to the relevant Character Appraisals and Management Plans if proposing development within a Conservation Area.
- 3.23 On balance, it is appropriate to conclude **uncertain minor cumulative negative effects** at this stage, given the extent of the local heritage value and the significant level of growth proposed cumulatively through the Garden Town Communities. It is recognised that there will be the potential to avoid/mitigate effects through site specific policy and detailed design of proposed allocations.

## Housing

- 3.24 The Draft Plan takes a positive approach to providing for the housing needs of the District, allocating sites to meet the District's housing requirement over the plan period. This has been established in coordination with neighbouring authorities within the HMA and is set out within the MoU, agreed in March 2017. The Draft Plan will deliver additional housing growth over identified needs to help meet the significant affordable housing needs, meet aspirations for regeneration and provide a buffer in case any sites don't come forward during the life of the Plan.
- 3.25 A strong focus on development in and around Harlow reflects the fact that the town represents the most sustainable location within the HMA. Harlow's role as sub-regional centre for employment is prioritised, as well as its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections; its important location on the London - Stanstead - Cambridge corridor; and above all, the wider growth aspirations for the town.
- 3.26 Draft Plan policies seek to ensure that housing is delivered at the right scale, of the right type and in the right location to meet community needs. The range of specific and specialist housing needs to be met includes affordable housing as well as the needs of Gypsies, Travellers and Travelling Showpeople communities. With regard to affordable housing, viability work leads to the conclusion that policy can require at least 30% affordable housing on major developments, meeting an affordable housing need of 154 dwellings per annum. With regards to Gypsy and Travellers, the proposal is to take a precautionary approach, in that accommodation will be provided over and above that necessary to meet the needs of Travellers.
- 3.27 In conclusion, **long term significant positive effects** are predicted.

## Land and waste

- 3.28 Development proposed through the Draft Plan has the potential for impacts on the quality and quantity of natural resources. The Plan will involve the loss of greenfield and agricultural land, directing a large proportion of growth to the East of Harlow Site where high value agricultural land is present. Opportunities to redevelop previously developed land through the regeneration of Harlow are set to be maximised; however, it is recognised available brownfield land within the District is limited.
- 3.29 There is the potential for a significant cumulative loss of greenfield and agricultural land surrounding Harlow as a result of development proposed through the emerging Harlow, Epping Forest and East Herts Draft Plans. However, it is important to note that there has been extensive work carried out at the HMA level through the Strategic Spatial Options Study to explore alternatives for development surrounding Harlow and ensure that the most appropriate sites are brought forward to meet identified needs.
- 3.30 On balance, it is appropriate to conclude **long term minor negative effects**; however, this conclusion is uncertain, given that there would be greenfield loss under a 'no plan' (or 'future baseline') scenario and that all the alternatives would result in a similar conclusion. It is not clear that more could be done through the spatial strategy to minimise greenfield land take.

## Landscape

- 3.31 The Draft Plan seeks to maximise the use of previously developed land and generally directs growth towards landscape areas of low landscape sensitivity. The regeneration of brownfield land presents an opportunity to have a positive effect on the built environment and townscape although the significance of this will be dependent on each site and the implementation of development.
- 3.32 The East of Harlow allocation proposes the delivery of around 2,600 new dwellings and associated infrastructure on greenfield land. The site falls within a relatively contained Landscape Character Area, with limited visibility resulting from the areas topography and the adjacent urban built form. The sense of tranquillity of the area is very limited, and as such while development is not expected to have significant negative effect on the landscape there will be changes to the character of the area.
- 3.33 In terms of cumulative effects, the development of the Garden Town Communities proposed through the emerging Harlow, Epping Forest and East Herts Draft Plans are likely to alter the character of the landscape surrounding Harlow. This will likely give rise to direct impacts to settlement edge landscapes through the loss of greenfield and agricultural land, which are inherently important on the basis that they are valued for their visual and historic character.
- 3.34 The policies contained within the Draft Plan aim to conserve, protect and enhance the natural and built environment of Harlow, including its Green Infrastructure network and overall landscape quality. Under Policy HGT1 (Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town) proposals are to deliver distinctive environments which relate to the surrounding area and the natural and historic landscape and systems, green infrastructure and biodiversity.
- 3.35 Development design is required to take into account of the adopted Harlow Design Guide SPD, ensuring that design and layout of new development respects Sir Frederick Gibberd's master plan for the New Town, ensuring the town is contained within the original landscape and retains as many natural features as possible. In this context, the Draft Plan policies provide a strong framework to ensure that the urban form and building design is shaped by, and responds to, the character of the surrounding countryside.
- 3.36 The precise layout and design of development surrounding Harlow, sensitivity of the landscape in those areas and mitigation available will ultimately determine the significance of effects. At this stage, **uncertain minor cumulative negative effects** are predicted as a result of the development of the Garden Town Communities proposed through the emerging Harlow, Epping Forest and East Herts Draft Plans. Careful master planning done in partnership with surrounding authorities and key stakeholders will help to reduce the significance of any residual effects.

## Transport

- 3.37 The Draft Plan will deliver housing, employment and associated improvements to services/ facilities and public transport, to meet the needs of new and existing communities, reducing the need to travel, and alleviating levels of congestion on the local transport network.
- 3.38 The delivery of the Harlow and Gilston Garden Town as well as other Garden Town Communities will be accompanied by new essential infrastructure across a range of sustainable modes, including the delivery of the Sustainable Transport Corridors to connect the major sites in the Garden Town. Policy HGT1 (The Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) promotes well located and co-ordinated development, which will facilitate the development of sustainable movement corridors, utilising growth to support public transport, walking and cycling corridors.
- 3.39 There are aspirations throughout the Draft Plan for a modal shift in travel, where 60% of travel would be by sustainable modes of transport and 40% would be by car. Sustainable transport matters (including walking, cycling and public transport) are, therefore, a key focus for Plan policies to support the successful future growth of Harlow.

- 3.40 While the Plan seeks to support modal shift away from car dependency; there are, however existing traffic problems that could be exacerbated. The transport modelling work undertaken indicates that the proposed level of development in the Draft Plan would increase traffic levels across the network.
- 3.41 A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A) and the provision of new Sustainable Transport Corridors through Harlow. On-site and off-site infrastructure proposed will help manage overall travel demand; establishing an integrated, accessible and safe transport system that meets the needs of existing and future cross-boundary residents and visitors.
- 3.42 On balance, it is appropriate to conclude **uncertain positive effects**, recognising that there is some uncertainty at this stage.

## Water

- 3.43 The Council will work with the relevant utility providers to ensure that new homes have connections to clean water, wastewater, and other utilities. Harlow Council commissioned a Water Cycle Study Phase 1 Update and the Draft Report did not identify any issues which require further assessment by a Phase 2 study.<sup>17</sup>
- 3.44 The development management policies within the Plan seek to ensure that water quality and water management is fully considered as part of new development proposals, and it is expected that most sites should prove possible to ensure adequate water supply and infrastructure. Taking the evidence into account a **neutral effect** is concluded at this stage.

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<sup>17</sup> Harlow Council (April 2018) Water Cycle Study Update Draft Report. Prepared by JBA Consulting.

## 4. Next steps

### 4.1 Part 3 of the SA Report answers - *What happens next?*

### Plan finalisation

- 4.2 Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then submit the plan (and the summary of representations received) for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).
- 4.3 If found to be 'sound' the plan will be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

### Monitoring

- 4.4 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The Submission Plan includes a range of proposed monitoring measures. The table below lists a selection of the Council's proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal.

**Table 6: A selection of the Council's potential monitoring measures**

SA topic	Proposed measure
Air quality	<ul style="list-style-type: none"> <li>Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose a number of monitoring measures.</li> <li>Risk of pollution and contamination.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Preparation of a Joint Action Plan to manage the impacts of growth on Epping Forest SAC (see Memorandum of Understanding), which is likely to propose a number of monitoring measures.</li> <li>Change in number of biodiversity and geodiversity designated assets in the district.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>None at this stage.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>Number of key local facilities in Neighbourhood Centres and Hatches.</li> <li>Delivery of strategic and local infrastructure to support new development.</li> <li>Amount of public open space, allotments, play space and sporting provision and facilities.</li> <li>Change in number and area of Recreational, Sporting, Cultural and Community Facilities.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Net additional employment floorspace up to 2033.</li> <li>Net loss of employment floorspace in Strategic Employment Areas and Neighbourhood Service Areas.</li> <li>Change in number of visitors.</li> <li>Change in employment floorspace outside Strategic Employment Areas and Neighbourhood Service Areas.</li> <li>Number of jobs created by the major developments.</li> <li>Net additional retail floorspace in existing Retail Centre.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>Change in number and area of heritage assets in the district.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Net additional dwellings built.</li> <li>Net additional dwellings built in Strategic Housing Site East of Harlow.</li> <li>Number of new Gypsy and Traveller pitches completed.</li> </ul>

SA topic	Proposed measure
	<ul style="list-style-type: none"> <li>• Percentage of new dwellings meet the Building Control Part M4(2) Standard for accessible and adaptable homes.</li> <li>• Number of dwellings for wheelchair users under the Building Control Part M4(3) standard in major residential development.</li> <li>• Type and size of housing in major residential developments.</li> <li>• Percentage of Affordable Housing built in new major residential developments</li> <li>• Net additional land allocated for self-build.</li> </ul>
Land and waste	<ul style="list-style-type: none"> <li>• Percentage of recycling household waste.</li> <li>• Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Retention of Green Belt, Green Wedge, Green Finger or Other Open Space.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Delivery of strategic and local infrastructure to support new development.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Percentage of new dwellings achieving the Optional Technical Housing Standard for water efficiency (no more than 110 litres per person per day).</li> </ul>

