

Harlow District Council Core Strategy Issues and Options **Sustainability Appraisal Report** **Non-Technical Summary (NTS)**

Final Report
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1 Non-Technical Summary (NTS)

1.1 Introducing the NTS

1.1.1 This is the Non-Technical summary (NTS) of the Sustainability Appraisal (SA) of the first draft of the Harlow Core Strategy. This draft is known as the Issues and Options document.

1.1.2 The purpose of the NTS is to explain in non-technical language all of the significant social, economic and environmental effects that the Issues and Options lead to.

1.2 Objectives of the Issues and Options

1.2.1 The Issues and Options is the first stage in the preparation of the Harlow Core Strategy. The Core Strategy is the principal document in the Local Development Framework (LDF) and, once adopted, will set out the District's development over the next 20 years. In particular, it will be used to identify and propose development of strategic importance to the District.

1.2.2 The Issues and Options document is based around seven main components: context; the issues; the strategic challenge; the vision, themes and objectives; guiding future development; spatial options for growth around Harlow; developing a delivery strategy. The document presents a number of alternative options:

- six spatial options for growth that examine possible broad locations for development outside the existing built up area of Harlow;
- six approaches to accommodating new employment; and
- a series of emerging policy options.

1.2.3 To help the Council and the public better understand the potential implications of these options for the economy, the environment and community, they have undergone SA. The results of the SA (alongside other technical studies, community engagement and public consultation, and professional expertise) are then used by the Council to develop the most appropriate policies for Harlow.

1.2.4 It is important to understand that the Issues and Options document has been prepared within a much wider context. This means that there is a wide range of European, national, regional, sub-regional and local policies that the Issues and Options must take into account.

1.2.5 At the national level, the Government's planning objectives are set out in a series of topic-based Planning Policy Guidance notes (PPG), Planning Policy Statements (PPS) and Planning Circulars. These set out the broad principles and objectives that the planning system should seek to achieve and they must be reflected in planning policies produced by each Local Planning Authority (LPA).

1.2.6 The Core Strategy identifies 26 strategic objectives under five themes. The strategic objectives aim to address a range of issues which will underpin the development of a series of policies and proposals to deliver the vision for Harlow.

1.3 Summary of the SA process

1.3.1 The role of Sustainability Appraisal (SA) is to assess how the key principles of sustainable development are incorporated into the plan-making process. SA is used to systematically test the effects that the plan may have on economic, environmental and community-related issues.

1.3.2 The first stage of the SA process is known as the scoping stage. In this stage the other plans, policies, programmes and initiatives that influence the Core Strategy are examined. Following this, data on the different characteristics of the district are collected. It is by comparing the expected effects of the plan against this baseline that we are better able to understand what is important and what is not. Next, key issues that need specific attention in the appraisal are identified. The assembled information is then documented in a Scoping Report. The Scoping Report was published in February 2010 and can be found on the Council's website.

1.3.3 This Report documents the appraisal of the Issues and Options. It also suggests measures that the Council can take in eliminating or minimising the negative effects and improving the beneficial ones. The appraisal process itself is systematic and the likely effects of each option are considered in relation to the following:

- Different spatial areas within Harlow:
 - Town Centre
 - Eastern growth area
 - Neighbourhoods
 - Industrial and employment areas
- Different topic areas are:
 - Air quality
 - Biodiversity and green infrastructure
 - Climate change (mitigation and adaptation) (includes flood risk)
 - Community and wellbeing
 - Economy and employment
 - Historic environment
 - Housing (includes gypsies and travellers)
 - Land (includes waste)
 - Landscape
 - Transport
 - Water

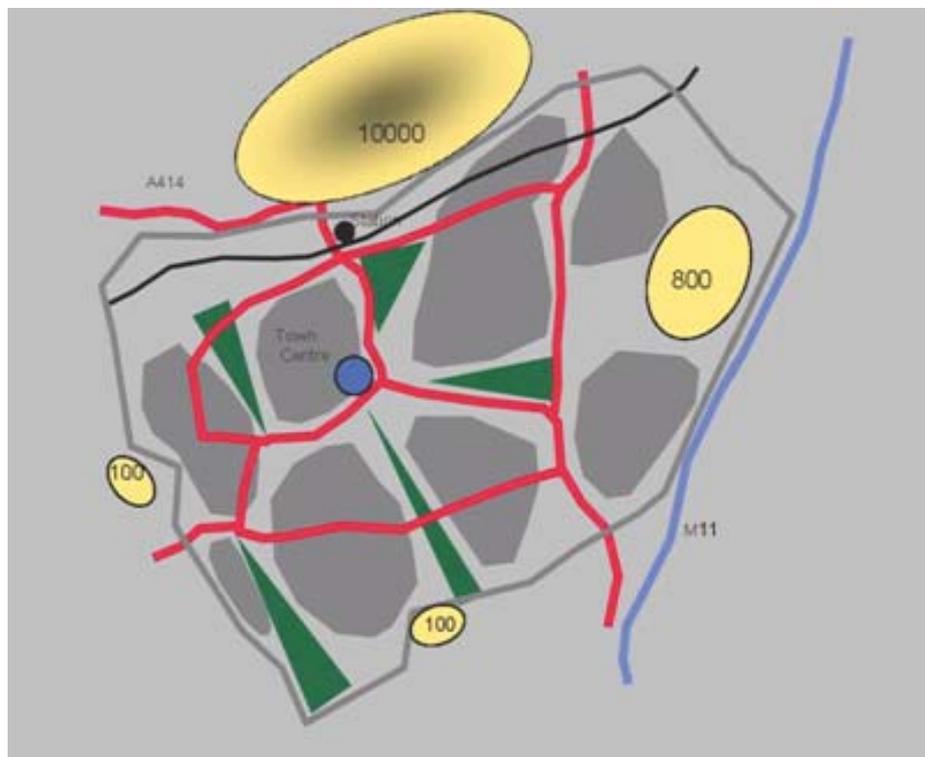
1.4 Summary of the likely significant effects of the spatial options

1.4.1 The SA individually appraised each of the different options that Harlow is currently considering for inclusion in the Core Strategy. The spatial options examine possible broad locations

outside the existing built up area of Harlow that could be brought forward for development. A summary of the potential effects from each option is described below.

- 1.4.2 There are a number of uncertainties regarding the impact of the spatial options against the SA framework. This is mainly due to a lack of detail regarding the nature of the development for each option. For example, if sustainable urban extensions are planned for – with flood risk, waste policy, transport, energy schemes etc. accounted for – this could result in a positive impact in relation to climate change. In addition, undertaking specific measures to plan for a sustainable community could result in positive impacts towards community wellbeing.
- 1.4.3 Similarly, greater detail on the exact nature of infilling proposed within Harlow’s existing built up area may be required to understand the combined impacts of each option. Currently, the Issues and Options’ impact on Harlow’s neighbourhoods is unclear in terms of whether new neighbourhood centres and/or hatches will be created in growth areas, and if so, what impacts and pressures there will be on existing neighbourhoods either from reliance on or competition with facilities and services in these areas. Consequently there is also a question as to whether existing neighbourhoods will receive support from infilling and other investment to improve the quality of facilities and services to meet these pressures. There is also a question of coalescence and the distinctness of neighbourhoods and whether new development would reflect or impact on the Gibberd masterplan principles.
- 1.4.4 Some of the negative effects that were identified are a result of delivering additional housing and therefore would apply to all options. These are primarily linked to the following factors:
- areas of flood risk and increased surface water flood risk;
 - increased levels of waste and water consumption;
 - congestion and inadequate transport infrastructure and sustainable (including public) transport options;
 - increased pressure on existing facilities and services, neighbourhoods and employment areas;
 - impacts in relation to the Gibberd masterplan, the landscape setting of Harlow and town design of distinct green wedges, and coalescence with existing neighbourhoods (within and outside the district); and
 - growth areas that direct growth outwards and will likely have a negative impact upon environmental assets, such as landscape, air, biodiversity and green infrastructure, historic assets, air quality, land and water. These result from short term impacts from construction of development and associated infrastructure and indirect longer-term pressures from an increased resident population.

Option A – RSS: Northern Led

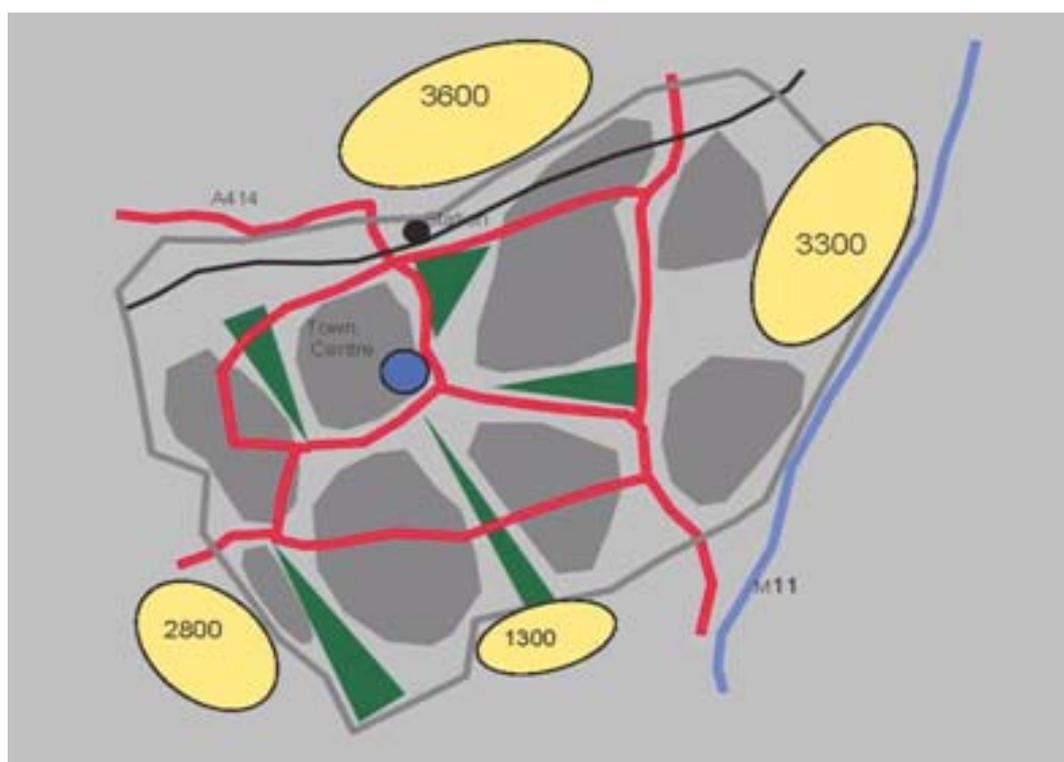


- 1.4.5 This option allocates the most amount of housing in the north when compared to the other spatial options. One key concern is potential coalescence of this development with communities outside Harlow, including Sawbridgeworth. Other issues of concern include continued urban decay in the rest of Harlow, isolation of the northern community and competition in terms of retail, services and facilities and employment. Policies to support regeneration district-wide in neighbourhoods and employment areas could mitigate this.
- 1.4.6 It is also important that the Stort Valley and river, rail line or other physical features do not act as a physical barrier and division, and that there is a high degree of accessibility between new development and the rest of the district. It does, however, offer the opportunity to create a distinct new neighbourhood. The principles of the Gibberd masterplan should be considered, particularly in the context of visual impact to the town, for example taking into consideration green wedges and views to the countryside of the north.
- 1.4.7 The Town Centre and other employment areas will need to be improved in order to meet the needs of the increased employee catchment delivered through development in the north, to improve Harlow as a place to work and to support the district-wide objective of a diversified economy. Transport links will need to be improved, particularly around the north and east, in order to manage additional pressure, and the opportunities for using the rail line should be explored. Pressure on environmental, historical and other assets – such as water and land – particularly in the north and east, will need to be mitigated and, where appropriate, opportunities to enhance these assets could be considered. Not only should negative impact on the Stort Valley and river (e.g. visitor pressure and pollution) be mitigated, but this spatial option could be developed to enhance this landscape and offer recreational opportunities. New recreational opportunities could also lead to improving the health and well-being of Harlow

residents. Development in a Flood Risk Zone 3 area and the creation of a barrier between the town and new development should be avoided, for example by considering how land on the flood plain could be developed as part of green infrastructure and wetland habitat.

- 1.4.8 The large scale of development presents the opportunity to create a sustainable urban extension to the north, and could incorporate district heating, renewable energy, waste reduction, green infrastructure, sustainable street and neighbourhood design, sustainable transport supporting a modal shift in behaviour change, etc. Large-scale development will need to provide sufficient high-quality facilities, services, retail and employment opportunities complementary to those within the district and supported with education and skills training.
- 1.4.9 Given the smaller amount of development in the east, open space should be protected and enhanced where possible, and improved in terms of biodiversity and accessibility for Harlow residents.

Option B – Policy Led 2

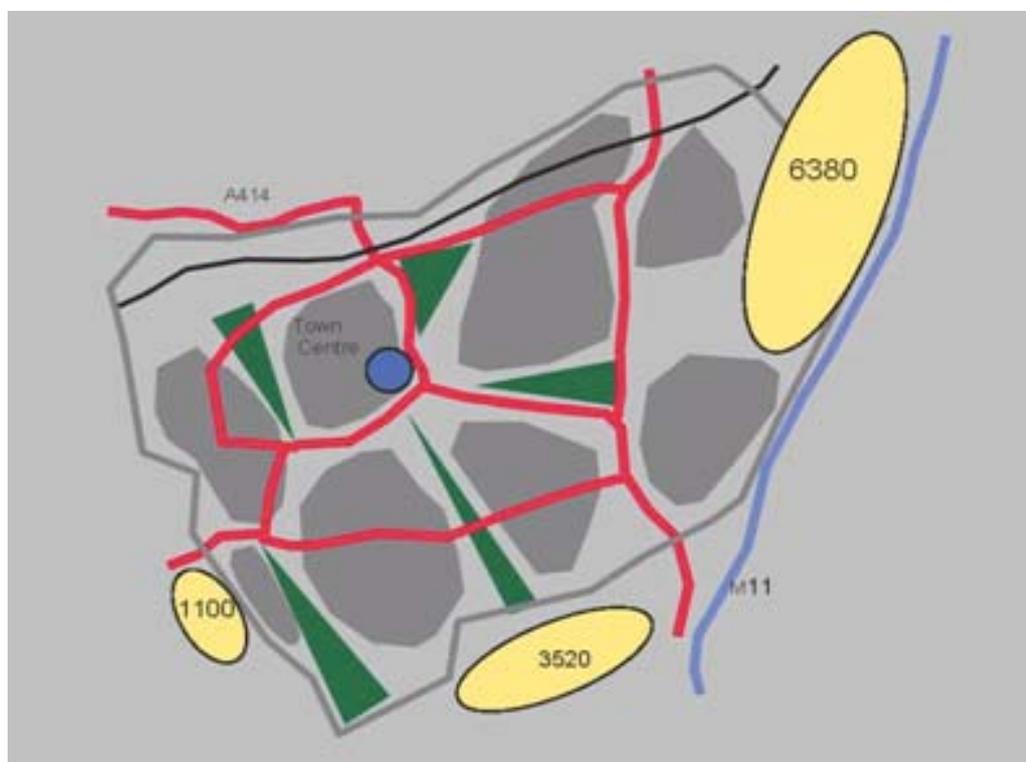


- 1.4.10 Of the spatial options, this option spreads growth the most, to the north, east, south and southwest of Harlow. Employment areas and neighbourhoods across the district should benefit from an increased labour and customer catchment, however, there would need to be investment to ensure that employment areas and neighbourhoods (centres and hatches) have adequate facilities and services to create a good place to both live and work; in order to stem out-migration. Similarly, the Town Centre would need investment to avoid residents seeking services elsewhere. Given the size of the developments it is unclear whether new neighbourhood centres will be created or whether they will need to become a part of existing neighbourhoods, however it is important that they are an integrated part of Harlow and that they create a sense of place for residents. In addition, they will need to be adequately

supported by services and facilities and, if this comes from within new development, should complement existing neighbourhoods.

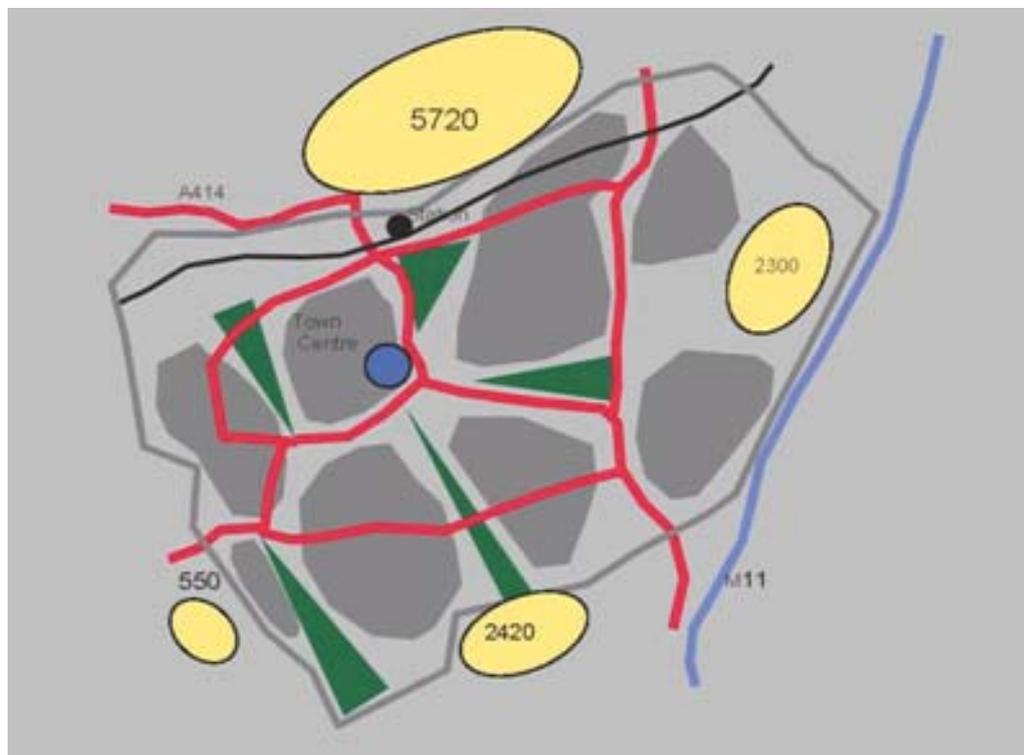
- 1.4.11 Spreading growth in this manner may reduce potential problems of congestion and facilitate short commuting distances to work, facilities and services; however, transport infrastructure district-wide would require appropriate investment. In particular, of all the spatial options this option places the largest amount of dwellings to the south west of the district, where public transport deficiencies may be exacerbated and would require investment to prevent reliance on car travel and those without cars being disadvantaged. Without adequate sustainable travel options, this could have a negative impact on air quality and climate change, and the phasing of infrastructure delivery will also be crucial. Moreover, it is difficult to state whether the size of the new developments would facilitate the creation of sustainable urban extensions and communities; however, the potential to create new neighbourhoods could bring significant benefits for new residents, provided negative impacts on existing neighbourhoods are mitigated.
- 1.4.12 Spreading growth could also facilitate planning for development to avoid impacts on environmental assets, including the historic environment, open space, biodiversity, etc. It is difficult to predict the landscape implications; spreading growth could minimise visual impact but the ridge line to the south presents a significant constraint on the scale of development. There are also potential impacts on agricultural land and Roydon and other communities, including visual coalescence.

Option C – Combined Criteria Led



- 1.4.13 In addition to mitigation measures common with the other spatial options, the type and necessity of mitigation is also shaped by the fact that of all the spatial options, the criteria led approach directs most development to the east and south of the town.
- 1.4.14 In particular, the large scale of development in the east and comparatively also to the south, may make it difficult to avoid and mitigate negative impacts on environmental and historic designations, including land, flood risk, biodiversity (County Wildlife Sites, wildlife verges and protected wildlife verges, Sites of Special Scientific Interest (SSSIs) – particularly to the south and Local Nature Reserves), open space and historic assets (Scheduled Ancient Monuments (SAMs) and buildings of historic importance). Development should seek to minimise these impacts as well as seek to enhance and, where appropriate, utilise assets for the community. Although it is noted that the east is the least sensitive landscape area, the significant scale of development could have an impact. Development to the south is located in a more landscape-sensitive area that may impact on the distinct ridgeline. If appropriate, the opportunity to create urban extensions and new communities that are sustainable should be pursued. Opportunities to link with sustainable development principles at Newhall could also be explored.
- 1.4.15 Another significant risk with the scale of housing to be accommodated in the east is coalescence with, and disruption to the character and setting of, existing settlements including Old Harlow, Church Langley and the planned settlement of Newhall. This will need to be accounted for through design and reference to the principles of the Gibberd plan may be required. Development should seek to improve the wellbeing of these communities. It is unclear if the creation of new neighbourhood centres to the east and south will be required, but sufficient community infrastructure, facilities and services to support the population will be required and should complement existing neighbourhoods (centres and hatches).
- 1.4.16 Transport linkages across the district to other neighbourhoods, employment areas and particularly the Town Centre, should be improved to address congestion and ensure benefits from an increased local catchment. Not locating development to the north could miss out on opportunities to improve Harlow Town station, the biodiversity and recreation opportunities in the Stort Valley and to link into improvements to Town Centre North. Housing deprivation in these areas could be exacerbated. Conversely, it could also protect the Stort Valley from negative impacts and avoid isolation of new development to the north. Policies for regeneration and investment should support Harlow's neighbourhoods district-wide in order to avoid inequalities and out-migration.
- 1.4.17 Opportunities to link to existing employment sites could be sought in order for employees to travel to places of work, and the large scale of development to the east and south in particular will need to be supported by job opportunities.
- 1.4.18 The significant scale of development proposed in the east could have a serious impact on transport and cause congestion without sufficient improvements to infrastructure and opportunities at Harlow Mill station and existing capacity constraints on the rail line will need to be addressed. In addition, opportunities to enhance and link with public footpaths and cycle paths and Harlow Town station could be missed without development to the north. Public transport to the south and west will need to be enhanced, and opportunities to link to the central line in Epping could be explored in order to counter congestion in the south. The phasing of all infrastructure delivery will be important.

Option D – Regeneration Led



- 1.4.19 In addition to mitigation measures common with the other spatial options, the type and necessity of mitigation for the regeneration led approach is also shaped by the comparatively large scale of development to the north and south and the comparatively small quantum of housing to the east of Harlow. This approach spreads growth to all fringes of Harlow, however, in comparison to other options the majority of development is placed to the north and south.
- 1.4.20 Placing a significant amount of development to the north and south is likely to have significant landscape impacts and development will need to be carefully planned so as to be landscape-sensitive and to take into account, in particular, the southern edge and setting to the town and Gibberd's masterplan principles with green wedges extending the view to the countryside. Visual coalescence with Sawbridgeworth to the north should be avoided and negative impacts on existing agriculture – particularly to the south – should be avoided if possible.
- 1.4.21 Land within the east of Harlow is of lower landscape sensitivity and, as such, placing a comparatively smaller amount of housing in this location may not use the land to its full potential and may increase negative impacts elsewhere where the rest of the total housing is located. However, it offers opportunities to enhance open space and protect the distinct settings of Church Langley, Old Harlow and development planned for Newhall.
- 1.4.22 The large scale of development in the north offers the potential for a sustainable urban extension and to enhance the Stort River and valley, encouraging sustainable lifestyle choices through intelligent design. However, it could result in isolation and coalescence with Sawbridgeworth and other communities outside of Harlow and could negatively impact on the landscape if inappropriately designed and planned. It might also compete with the town centre

offer and transport links to the Town Centre and the rest of Harlow would need to be adequate. Development in the north should look at ways to manage flood risk from the Stort.

- 1.4.23 Spreading growth to the fringes of Harlow could have positive impacts district-wide by encouraging investment and regeneration; however, this would need to be supported by policies and it is unclear whether new development will create new neighbourhood centres which should complement existing neighbourhoods and support existing communities. Existing employment areas should benefit from an increased labour pool district-wide, however investment may be needed to meet demand for facilities, to support diversification of the economy and to make Harlow an attractive place to both live and work, including commuter links. Improved transport infrastructure, complementary education and training, and appropriate phasing of delivery will be essential. Improvements to transport would be needed to facilitate movement throughout the district in order to minimise congestion, improve accessibility for new communities and reduce any negative impacts on existing communities. Public transport in the south is a particular concern, and opportunities to capitalise upon the railway route through Harlow and the Epping underground station to the south could be explored, in addition to the National Cycle Route 1.

Option E – Sustainable Transport Led

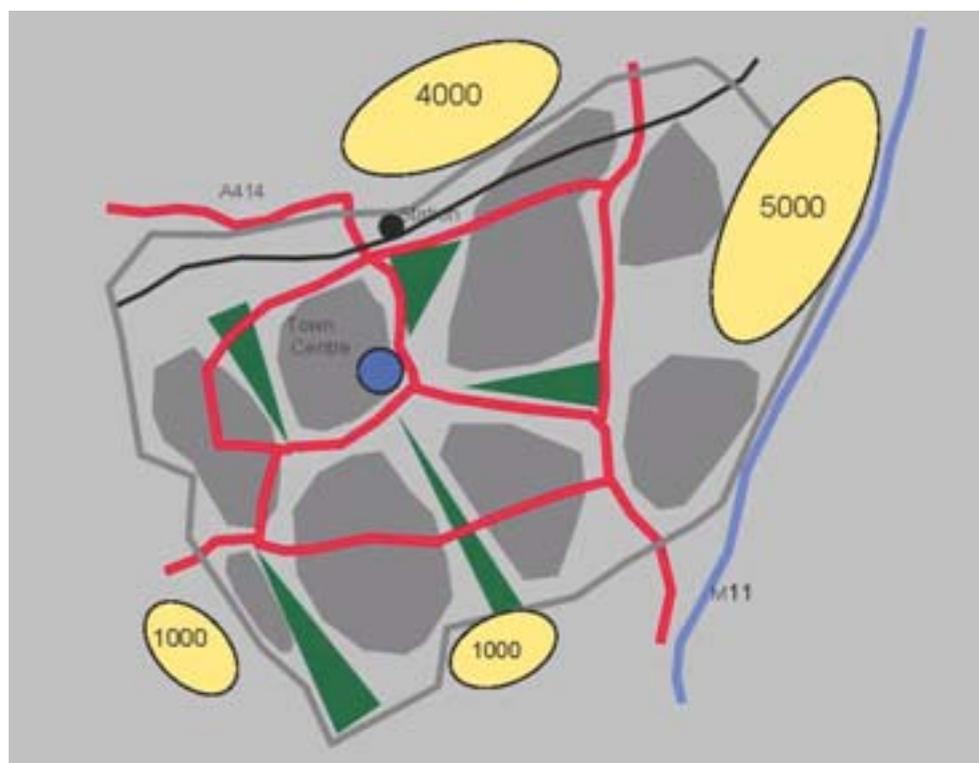


- 1.4.24 In addition to mitigation measures common with the other spatial options, the type and necessity of mitigation for option E is also shaped by the comparatively large scale of development particularly to the east and west. No development is proposed to the south and a comparatively a relatively small quantum of housing to the north.
- 1.4.25 This approach is dependent upon the provision of key transport infrastructure at these locations and would suggest that the potential of the rail line could be explored if issues of capacity are

addressed. It would be important for transport provision to include sustainable travel options rather than just to be based on road infrastructure; this includes green corridors and National Cycle Route 1. Not placing development to the south could exacerbate public transport deficiency in this location and opportunities to link to Epping underground station to the south could be missed. Moreover, encouraging links to road infrastructure may increase levels of out-migration.

- 1.4.26 Under this option in particular, development to the west could result in coalescence with Roydon and an impact on character and setting. It could also exacerbate issues of congestion if not supported by adequate transport infrastructure. There will likely be impacts on agricultural land to the west and indirectly to a nearby SSSI. However, the option could allow inadequacies in terms of housing in the west of the district to be addressed and could support the Pinnacles employment site and Town Centre through a local catchment pool and associated accessibility (provided it is accompanied by sufficient investment).
- 1.4.27 Development to the north of Harlow has been discussed for other options, however, the quantum of housing proposed under this option is comparatively small and this could impact on the viability of a sustainable new community and required supporting infrastructure. Given the smaller size of development, it could make it easier to mitigate impacts on the landscape and local environmental assets, and could avoid coalescence with towns and villages outside of Harlow.
- 1.4.28 The impacts of placing development to the east have been discussed under the criteria led approach.

Areas of search and potential housing distribution



- 1.4.29 Similar to option B - Policy Led 2, this option spreads growth across the district. However, it proposes a smaller quantum of housing to the south and south west and, as a consequence, developments to the north and east are larger. In addition, this option proposes a larger quantum of housing to the east, rather than the north. As a consequence, the appraisal and summary for this policy is similar to that of option B in terms of spreading growth, with some key differences.
- 1.4.30 Although it is not clear at this stage, the small size of development proposed to the south and west may not make the creation of new neighbourhood centres viable and may instead result in increased pressure on existing services and facilities. It is important that appropriate investment in these areas will support additional dwellings and residents. It is also important that new development is integrated with existing neighbourhoods to promote a sense of place. Existing deficiencies in public transport will likely be exacerbated by an increased population in these areas and it is unclear if the scale of development will facilitate the necessary level of investment to upgrade the transport network and to provide sustainable transport options. It may also result in disadvantage to those without access to cars.
- 1.4.31 The large scale of development to the east may have an impact on Conservations Areas and the distinct setting of the neighbourhoods of Old Harlow, Church Langley and the new development at Newhall. It will also result in the loss of a substantial amount of open space and Green Belt. However, this area has the least sensitive landscape in Harlow and may therefore absorb development better than other areas. Careful planning will be required to avoid negative impacts and an opportunity exists to create a new sustainable community, which could include the integration of green infrastructure and the enhancement of open space.

Summary of Spatial Options

- 1.4.32 All potential spatial options have the potential to create both positive and negative effects.
- 1.4.33 Except for option C – Combined Criteria Led, the spatial options propose a substantial amount of development to the north of Harlow. Development to the north of Harlow offers the potential to create a new sustainable community and to enhance the River Stort and valley. However, there are concerns that development to the north may result in isolation of a new community from the rest of Harlow, a negative impact on the River Stort and valley, and continual out-migration and urban decay within Harlow. In particular, the scale of development proposed under option A – RSS: Northern Led may find such potential difficulties harder to mitigate. Moreover, a larger scale of development poses a greater risk of coalescence with communities outside of Harlow including Sawbridgeworth, and may negatively impact upon Harlow’s setting and sense of place as a town. Equally, there is a concern that option C - Combined Criteria Led may miss out on the potential to develop a new community to the north of Harlow.
- 1.4.34 Within and to the east of Harlow there is scope to place a significant quantum of housing. Option A – RSS: Northern Led (and to a lesser extent Option D - Regeneration Led) may therefore miss out on this potential and instead risk a greater overall impact on environmental assets and landscape elsewhere around Harlow. Although the eastern growth area has low landscape sensitivity, all options propose development in this area and there are assets (such as open space) that would be impacted upon. However, the amount of housing placed in the east varies between spatial options. Although proposing less development in the east could minimise impacts and perhaps allow for improved quality of open space and accessibility, avoid development in the flood plain, etc. it should be noted that, as a consequence, the remaining housing quantum (given the total district-wide quantum is same for each option) will be placed

- in areas of higher landscape sensitivity. However, although housing located in the east may be better absorbed in this respect; there are other sustainability issues that should be taken into account.
- 1.4.35 There are concerns that a lack of transport infrastructure may exacerbate congestion in the east, although a significant scale of development may facilitate the delivery of improved transport infrastructure and accessibility. Similarly there will need to be adequate facilities and services to support the scale of development. Phasing will be critical for options delivering a large quantum of housing in this location, particularly Option C - Combined Criteria led, Option E - Sustainable Transport led and areas of search and potential housing approaches. There are also concerns about coalescence and a negative impact on the existing communities of Old Harlow, Church Langley and the planned development at Newhall. Careful design and planning will need to be mindful of the settings of these communities and look to enhance and benefit these neighbourhoods, without drawing investment from these areas. The loss of open space will need to be compensated for and, in common with options placing development to the north; a large quantum of housing may facilitate the integration of green infrastructure and the creation of a new sustainable community and neighbourhood. These measures could include the integration of green infrastructure, waste reduction and recycling schemes, low carbon energy schemes and the promotion of sustainable lifestyle choices.
- 1.4.36 Spreading growth across the fringes of Harlow, for example option B – Policy Led 2, option D - Regeneration Led and areas of search and potential housing, could assist regeneration across the district and address inequalities. The spatial areas of the town centre, neighbourhoods and employment areas could benefit from such an approach by increasing the local catchment; however this would need to be accompanied by improved transport linkages and existing facilities and services to support an enlarged population size. By not concentrating development at locations it might also facilitate planning that avoids impacts on environmental assets and could ease congestion overall. However, it is possible that it might make the creation of sustainable communities less viable and, where a small quantum of development is proposed, it might increase pressure on existing facilities and services. In addition, the issue of transport is complicated and lack of localised investment may not support necessary upgrade and accessibility; the south and west in particular have poor public transport connections which would need to be addressed.
- 1.4.37 Creating a new or a number of new sustainable communities and urban extensions presents an exciting opportunity under all the options. The most appropriate location for such a community is an over-riding factor that this appraisal cannot answer at this stage, including the scale of development that would be required at a location to make a viable new neighbourhood. Moreover, too large a community could be cumulatively too great an impact on resources and designations and it could result in coalescence, a loss of Harlow's sense of place and continued urban decay in other parts of Harlow if development is not spread more evenly. Therefore, it would seem important that a spatial option should spread development and impacts district-wide (provided that policies also support improved transport infrastructure, facilities and services and investment district-wide). Further to this, development proceeding to a sufficient scale should allow the potential for new sustainable communities to be realised, where most appropriate and as an integrated part of Harlow so as to enhance neighbouring communities and to create a distinct sense of place and neighbourhood (perhaps in the east and to the north). Impact on the Green Belt, landscape, the principles of the Gibberd plan, and transport implications (including the potential of the rail line and existing constraints) should all be taken in to consideration for any spatial option.

1.4.38 Overall, the high levels of growth should enhance Harlow's role as a sub-regional centre and lead to an overall improvement in the District's economic situation. It is essential that existing development can support new development and any benefits to existing development should be sought. However, at this stage the spatial options have little detail and emphasis on investment and development within Harlow and there is little opportunity to appraise and reflect upon this.

1.4.39 There is a need to consider the consequences of the spatial options in terms of how they promote Harlow's role as a regional centre and how they support the objectives for the area.

1.5 Summary of the likely significant effects of the employment options

1.5.1 Areas of search to accommodate new employment will need to be identified in Harlow. Options include:

1. Within existing employment areas and those identified in the Adopted Local Plan
2. Within the urban extensions being considered to accommodate growth in the area
3. The identification of new employment areas at appropriate locations
4. The promotion of live-work units at appropriate locations
5. A combination of these approaches
6. Within existing employment areas and within urban extensions.

Broad locations of current employment sites in Harlow



- 1.5.2 The appraisal assumed that Options 1, 2 and 6 were mutually exclusive (stand-alone options) and that Options 3 and 4 would be considered as additional to these options. Option 5 represents a combination of all the options.
- 1.5.3 In theory, there should be a surplus of employment land available within existing sites (Option 1). However, this will not be enough to accommodate the range of employment uses (e.g. warehousing) which requires particular locational features, meaning that Option 1 would need to be accompanied by Option 3 (identification of new employment areas at appropriate locations) for a more positive outcome. By considering urban extensions (Option 2) this could allow for the location of employment at local sites for short commuter distances (mitigating out-migration), for meeting better accessibility and infrastructure needs and supporting the economy, facilities and services in these new areas. However, this would mean that availability at existing sites would be overlooked, negating PDL targets and missing opportunities to upgrade and improve these sites for the benefit of the economy, the environment and for social needs. Option 3 as a support to Option 2 would similarly be a more optimal approach than Option 2 alone. However, extending the search to both within existing sites and urban extensions (Option 6), in addition to Option 3, would cumulatively allow for the best employment locations to be identified. There is also a need for a range of smaller sized businesses, meaning that Option 4 (the promotion of live-work units) would also increase the positive impact of options 1, 2 and 6. Thus it is apparent that Option 5 (a combination of these approaches) would cumulatively be the best approach.

- 1.5.4 The level of detail provided in the draft Core Strategy and lack of clarity over the exact nature of the options means that appraising the options and suggesting effective mitigation and enhanced effects is difficult. One of the major limitations to the appraisal is not knowing the exact spatial distribution of the options and it is not clear to what extent either Options 3 or 4 would impact on land take or biodiversity through change of land use. However, given the wider search area for Options 5 and 6 (to a lesser extent), this could allow for the mitigation of a number of impacts (e.g. for biodiversity, historic environment, landscape, water, etc) and could also result in positive impacts (e.g. for community and wellbeing, housing, transport etc). In order to ensure this it would be important to consider a range of criteria addressing these topics (and potentially others) as part of the employment area search strategy and site selection process.
- 1.5.5 One of the key objectives of the housing growth and employment provision in and around Harlow is to facilitate the regeneration of the town and the wider district. Strictly adhering to any of the proposed options may not necessarily provide the right combination of factors to address all the needs of all business sectors, both existing and proposed. A balanced approach to employment provision, capitalising on the assumed greater flexibility of location (due to an assumed smaller scale offering) of Options 3 and 4, could be better matched to meeting particular local-scale regeneration needs.

1.6 Summary of the likely significant effects of the developing policy options

- 1.6.1 At this stage of Core Strategy development proposed policy areas have been identified. The detail of these policies will come at a later stage of the Core Strategy development process and will be instrumental in the determination and identification of sustainability impacts. The growth and development expected for Harlow has the potential to have negative impacts in terms of air quality, biodiversity, climate change (flood risk and emissions), historical assets, landscape, land, transport and water. There are a number of avoidance and mitigation considerations that could be developed further and detailed within these policy areas. Particularly these will stem from decisions made on the strategic direction and general locations of growth within and in urban extensions to Harlow.
- 1.6.2 In terms of development more generally, in addition to current policy areas that seek to encourage and promote best practice in design and inclusion of sustainability measures, there is the potential for other areas to be considered. These include water conservation, biodiversity enhancement, minimise waste generation and maximise waste reuse and recycling, the implementation of considerate construction and street design e.g. to minimise residential reliance on cars and to maximise safety. This should not be limited to housing, but expanded to other development to create an environment in Harlow that is both good to live and work in. It is important that new development also minimises water, land, air and noise pollution and visual impacts.
- 1.6.3 Locational criteria for development is not detailed as yet, but this should include consideration of air quality, biodiversity, historical assets, landscape and land assets, flood risk, and transport links, and ways in which negative impacts could be avoided or minimised and benefits be maximised. This should be extended to brownfield land, which can also have unique qualities.
- 1.6.4 Encouraging the provision of community facilities on good transport corridors are likely to increase traffic and car dependence, unless mitigated with considerations such as car

schemes, street design and good public transport corridors. The importance of Harlow's strategic location also highlights that the role of transport routes into and within the district will be key. It would also be beneficial (due to the amount of housing delivery expected in Harlow) to emphasise the requirement for transport infrastructure during phasing to ensure that congestion does not occur following the completion of development. Also good transport links between residential areas and employment areas will be necessary.

1.6.5 The specific needs of different spatial areas within Harlow – e.g. employment areas, town centre, neighbourhoods, etc. – could be further outlined within the policies context in order to create a targeted action of needs. It is important to pay attention to the different ward and community profiles of Harlow, in order to address neighbourhood needs and specific challenges such as pockets of deprivation within Harlow, and ensuring that facilities and services are accessible to all residents in order to minimise any inequalities within the district. Adequate provision of education and training should be considered to keep pace with and address existing deficiencies and to accompany any new employment areas and opportunities for research and development. Although policy areas under the themes include crime prevention measures in new development and the creation of safe spaces, policies could also seek to promote integration, tolerance, and community wellbeing. Initiatives to improve the sense of community within Harlow, such as community participation schemes, should also be considered. Homelessness in Harlow is also an issue that may require policy consideration.

1.6.6 There could be a number of wildlife corridors and important wildlife linkages both within and extending outside Harlow district, which would also play an important role in buffering against climate change. In addition to their definition, the role of Green Wedges in the district could be explored e.g. in terms of defining neighbourhoods, extending views from the town centre into the surrounding landscape, and also as wildlife corridors.

1.7 Summary of mitigation suggestions

1.7.1 Mitigation recommendations are suggestions made by Scott Wilson for different ways to ensure that the negative effects of the plan are stopped or reduced. In some cases it is also possible to suggest ways to enhance the beneficial effects that the plan might have. Based on the appraisal of the Harlow Issues and Options, the following range of key mitigation recommendations have been made¹:

- Spatial options:
 - Policies for sustainable construction and design can incorporate measures to mitigate and enhance impacts on a range of topics where appropriate, including in the existing urban fabric of Harlow. This includes the topics of air quality, biodiversity and green infrastructure, climate change (including flood risk), historic environment, land (including waste and recycling), landscape and water.
 - Seek opportunities to create sustainable urban extensions and communities where the scale of development permits, including the possibility of waste-to-energy and other low carbon energy schemes.
 - Avoid direct impacts on environmental and historic designations and seek opportunities to enhance these assets where possible. Loss of open space should be avoided or compensated.

¹ Recommendations specific to particular parts of the district are included in the main SA Report.

- Avoid coalescence with settlements both outside and within Harlow.
- Provide and support sustainable transport options minimise car reliance, encourage a modal shift and address issues of congestion (although consider the impacts of increasing visitor pressure on environment assets). Transport infrastructure should complement the chosen spatial option and rail and cycle options should be explored.
- Avoid development in Flood Risk Zone 3 as well as avoid exacerbating flood risk elsewhere and surface water flooding as a result of new development. There is an opportunity on the flood plain to create green infrastructure and wetland habitat, without creating a physical barrier in Harlow.
- A Green Belt review should be undertaken prior to approval of development.
- Gypsy and Travellers sites need to be considered as part of the LDF process and communities engaged.
- Policies for renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible. An agricultural land survey could be undertaken to ensure that only the lowest quality land is brought forward for development.
- Ensure adequate supporting facilities and service in both employment and neighbourhood areas, to meet regeneration needs, the needs of an enlarged population, the diversification of the economy, and to improve Harlow as a place to both live and work. Improve connectivity and accessibility throughout the district through transport and design measures.
- Strong policies are required to minimise water use and maximise water efficiency.
- The proposed development at Rye Meads Sewage Treatment Works (STW) will be an important additional consideration.
- Consider the Gibberd principles and impacts of new development on town and landscape setting, including green wedges.
- Employment areas:
 - Strictly adhering to any of the proposed options may not necessarily provide the right combination of factors to address all the needs of all business sectors, both existing and proposed. A balanced approach to employment provision, capitalising on the assumed greater flexibility of location, could be better matched to meeting particular local-scale regeneration needs.
 - Where new employment provision is likely to impact on open space provision and biodiversity, the developments should ensure they incorporate green infrastructure provision and opportunities for biodiversity.
 - Developments should be located so as to be accessible via walking and cycle networks and if necessary through new public transport infrastructure. This will help reduce impacts on climate change through reduced emissions and could also provide wider benefits in terms of improved health and more sustainable live-work lifestyles.
 - Where employment provision could impact on local landscape value efforts should be made to ensure it is sympathetically incorporated into the wider countryside.

- Consider a range of criteria as part of the employment area search strategy and selection process. These could consider the mitigation of impacts (e.g. for biodiversity, historic environment, landscape, water, etc.) and could aim to result in positive impacts (e.g. for community and wellbeing, housing, transport, etc.).
- Developing policy options:
 - Highlight considerations for the development of more detailed policy content as policies are further developed.
 - Provide linkages between policy areas contained under different themes.
 - Identify specific references that should be included in policies.
 - Propose new policy areas for consideration.
 - Suggest changes to existing policy areas.

1.8 How best can we monitor the plan's impacts?

- 1.8.1 More detailed monitoring suggestions will come at a later stage of the Core Strategy development process. Significant effects indicators are a type of indicator for inclusion in Annual Monitoring Reports (AMRs) and should be linked to the SA.
- 1.8.2 In identifying and evaluating the impacts of the Core Strategy, appraisers may identify 'significant effects' which require monitoring. Monitoring significant effects should enable a comparison to be made between the effects predicted in the SA and the actual effects measured during policy implementation.
- 1.8.3 Collaboration will be needed with the other districts (East Herts and Epping Forest), in terms of monitoring significant effects highlighted from the SA which relate to new urban extensions.

1.9 Next steps

- 1.9.1 To enable the community and other stakeholders to continue to contribute to the LDF, there is now a period of consultation on Harlow's Core Strategy Issues and Options. This SA Report will be available for consultation alongside the Core Strategy, to facilitate more informed consultation responses.
- 1.9.2 Following the consultation, the consultation responses as well as the findings of the SA will be taken into account by the Council as it develops the Core Strategy. The Core Strategy will undergo further informal and formal consultation exercises until it's drafted in its final form and submitted to Government. The Core Strategy will then undergo independent examination by a planning inspector before being adopted by the Council.