

# Harlow District Council Core Strategy Issues and Options **Sustainability Appraisal Report**

Final Report  
October 2010



Photographs courtesy of Harlow District Council

Prepared for

## Revision Schedule

### Sustainability Appraisal Report: Core Strategy Issues and Options October 2010

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# 1 Introduction

## 1.1 This report

1.1.1 Scott Wilson has been commissioned by Harlow District Council ('the Council') to carry out the Sustainability Appraisal (SA) of the Harlow Core Strategy Issues and Options. The Core Strategy forms part of the Harlow Local Development Framework (LDF).

1.1.2 SA involves identifying and evaluating the impacts of a plan on the economy, the community and the environment – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts. SA is a statutory requirement for Core Strategies and other Development Plan Documents (DPDs) under the Planning and Compulsory Purchase Act 2004. SA is also required for Regional Spatial Strategies; therefore previous appraisal of growth around Harlow has also been undertaken at this level.

1.1.3 In order to undertake the appraisal of the Core Strategy and other DPDs, it is first necessary to establish a methodology or framework for undertaking the appraisal as well as an evidence base to inform the identification and evaluation of impacts. The framework and evidence base are documented in a Scoping Report that was consulted upon and published in February 2010.

1.1.4 It should be noted that the SA incorporates a Strategic Environmental Assessment (SEA) as required under EU legislation<sup>1</sup>.

## 1.2 Harlow Core Strategy

1.2.1 The Council commenced preparing their Core Strategy in September 2007. The Council has now prepared Issues and Options for consultation. This report documents the SA of the Core Strategy Issues and Options.

## 1.3 Report structure

1.3.1 This report is structured as follows:

- Chapter 2 sets out the approach to undertaking the appraisal
- Chapter 3 introduces Harlow's Core Strategy document
- Chapter 4 sets out findings from the Scoping Report, including the Policy Context, situation now and without the Plan, and key issues for the appraisal to focus on
- Chapter 5 tests the compatibility of the Core Strategy objectives against the SA framework
- Chapter 6 sets out the principles to direct growth
- Chapters 7 – 12 set out the appraisal of the spatial options
- Chapter 13 sets out the appraisal of the employment options
- Chapter 14 sets out the appraisal of the developing policy options

<sup>1</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and Programmes on the environment (the 'SEA Directive') implemented through The Environmental Assessment of Plans and Programmes Regulations 2004

- Chapters 15 – 16 set out general conclusions and what happens next in the plan-making and SA processes.

## 2 Approach to the SA

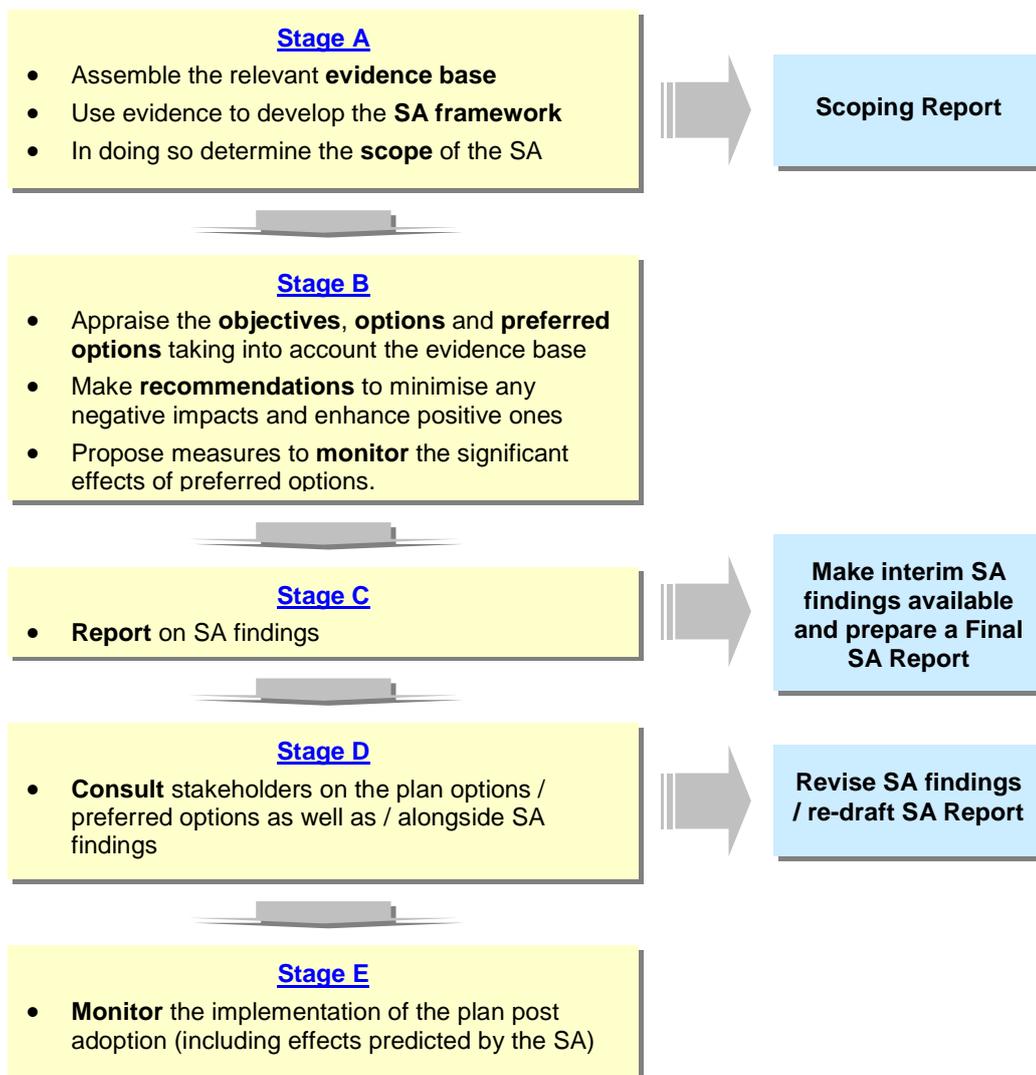
### 2.1 Introduction

2.1.1 This chapter sets out the approach taken in undertaking the SA.

### 2.2 SA process

2.2.1 SA is based on a five-stage approach – see Figure 1. At the Issues and Options stage, SA serves to identify the key sustainability implications of the potential decisions that are contained within the document. This provides the local authority with additional evidence to take into account in further developing their Core Strategy.

**Figure 1: Five stage approach to SA**



## Stage A – Framework and evidence base

- 2.2.2 Stage A in the SA process involves developing the framework for undertaking the appraisal – in this case the identification of a series of spatial areas and topics on which the appraisal will focus – together with an evidence base to inform the appraisal. The framework and evidence base are presented in a Scoping Report – which may be accessed on the Harlow Council website<sup>2</sup> – for consultation with stakeholders including English Heritage, the Environment Agency and Natural England and the public. The evidence base presented in the Scoping Report should include an analysis of the relevant policy context; a description of the current baseline situation; an analysis of how the current situation might evolve in the absence of the plan; and the identification of any problems which the plan may need to address.

## Stage B – Appraisal

- 2.2.3 Stage B in the SA process involves undertaking the appraisal itself. This involves identifying and evaluating the impacts of the different options to the plan makers as well as the preferred options / policies which together comprise the plan. The appraisal is organised around the framework identified in Stage A and informed by the evidence base assembled at Stage A. Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation. Mitigation measures are generally in the form of recommendations for changes to the plan in order to improve its sustainability performance. Crucially, the appraisal should be undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan. In practice, this means undertaking several rounds – or iterations – of appraisal at different stages in the plan-making process.

## Stage C – Reporting

- 2.2.4 Stage C in the SA process involves documenting the appraisal findings and preparing an SA Report (this incorporates the material required for inclusion in the 'Environmental Report' under the 'SEA Directive'). The full SA Report should be published for consultation alongside the 'pre-submission' version of the DPD in question; however, SA reports focusing on the emerging plan may be published earlier in the plan-making process (e.g. at the 'issues and options' stage).

## Stage D – Consultation

- 2.2.5 Stage D in the SA process involves consulting on the 'pre-submission' version of the plan and the accompanying SA Report; however, as stated above, SA reports can be prepared to accompany consultation on earlier versions of the plan.

## Stage E – Monitoring

- 2.2.6 Stage E in the SA process involves monitoring the adopted plan including its sustainability impacts; this is done through the LDF Annual Monitoring Report (AMR).

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<sup>2</sup> See:

<http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/sustainability%20appraisal%20scopi.aspx>

## 2.3 SA methodology

2.3.1 The methodology that has been adopted for undertaking the SA is based on a 'whole plan' approach. This means that instead of appraising the individual components of the plan against a number of sustainability objectives, the effects of the plan as a whole are appraised and evaluated against a range of topics and spatial areas. The topics and spatial areas were identified in the Scoping Report and were consulted upon. They were developed from:

- The topics addressed in the SA of the East of England Plan<sup>3</sup>
- The topics suggested in the SEA Directive (see Table 1)
- The likely significant effects of the Core Strategy
- The views of the Council.

2.3.2 These topics and spatial areas effectively form the 'SA framework' against which the plan is systematically appraised (please see 2.4).

2.3.3 For each spatial area and topic we asked a series of questions in order to satisfy the requirements of the SEA Directive when we completed the Scoping Report:

- What's the policy context?
- What are the key sustainability objectives that we need to consider?  
*(we referred to the objectives set out in the Regional Integrated Sustainability Framework<sup>4</sup> and the Harlow Sustainability Strategy key priorities 2009/10 to 2012/13<sup>5</sup>)*
- What's the situation now (including any identified problems)?
- What will be the situation without the plan?<sup>6</sup>
- What issues should be a particular focus for the appraisal?

2.3.4 As mentioned in 1.1.3, the Scoping Report was subject to five weeks consultation after which the final report was published in February 2010. However during this iteration of the SA after the consultation period had closed, comments on the Scoping Report were received from Natural England. Table 1 shows the comments received and responses to those comments which have been incorporated in this version of the appraisal.

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<sup>3</sup> Scott Wilson and Land Use Consultants (2009) *East of England RSS Review: Integrated Sustainability Appraisal Scoping Report* [online] available at: <http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/east-of-england-plan-review-to-2031-integrated-sustainability-appraisal/> (accessed 2 June 2010)

<sup>4</sup> East of England Regional Assembly (2009) *Sustainable Futures: Integrated Sustainability Framework for the East of England* [online] available at: <http://www.eera.gov.uk/What-we-do/developing-regional-strategies/integrated-sustainability-framework/> (accessed 2 June 2010)

<sup>5</sup> Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: [http://www.harlow.gov.uk/about\\_the\\_council/council\\_services/corporate\\_services/policy\\_and\\_performance/sustainability\\_strategy.aspx](http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx) (accessed 2 June 2010)

<sup>6</sup> Note that the situation without the plan equates to the current plan for the District together with other future changes and trends.

**Table 1: Comments received post-consultation on the Scoping Report from Natural England and how they have been considered in this appraisal**

Comment	Response to comment (noted, agree, disagree)	How has this been taken into account?
Natural England welcomes the production of the Final Report for the Sustainability Appraisal Scoping process, and we consider it to be an extremely comprehensive document.	Noted	N/A
For the proposed topics set out in 2.4.3, we would suggest a slight modification to the second topic to read 'biodiversity, geodiversity and green infrastructure'.	Disagree	The topic title has not been modified. Topics were developed in discussion with the three district councils (East Herts, Epping Forest and Harlow) in light of the East of England (EoE) plan requirement HA1 for co-ordinated DPDs. The SA has followed this co-ordinated approach. This could be considered in a future review of the Scoping Report if geodiversity was determined to be a considerable issue for Harlow.
<b>Chapter 8: Biodiversity and Green Infrastructure</b>		
We welcome the prominence given to policies ENV1 and ENV3 from the EoE Plan, and also the inclusion of the Harlow Green Infrastructure Plan (GIP).	Noted	N/A
We can also confirm that, to our knowledge, the nationally and locally designated sites for both biodiversity and landscape have been accurately and fully captured.	Noted	N/A
The identification of the evidence gaps in 8.4.7 will enable the concentration of resources to meet these gaps, and we welcome the database for Biodiversity as a centralised resource to record, store and assess changes in the key biodiversity indicators over time.	Noted	N/A
<b>Chapter 9: Climate Change</b>		
The relevant policies, the key issues to be considered through the Core Strategy iterations, and the evidence gaps (especially the current lack of an SFRA) appear to us to have been properly identified in broad terms.	Noted	N/A
We note that there is no specific reference to the important issue of species dispersal and adaptation as a result of climate change, and we regard this as an important element of consideration in longer-term planning. The issue is indirectly referred to in the buffering elements of key biodiversity	Agree	This issue has been considered in this iteration of the appraisal – specifically within the Biodiversity and Green Infrastructure and Climate Change topics. A specific bullet point in 9.6.1 will be included in a future review of the Scoping

Comment	Response to comment (noted, agree, disagree)	How has this been taken into account?
assets set out in Chapter 8, but climate change adaption should put more stress on creating and enhancing wildlife corridors and wider landscape-scale linkages to allow animals and plants to spread out and move to more suitable locations over time. A specific bullet point in 9.6.1 setting out this issue would be welcome.		Report.

2.3.5 In this report we have asked the following questions to appraise the Core Strategy Issues and Options:

- What will be the situation with the plan?
- How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?
- How can we best monitor the plan's impacts?.

2.3.6 These questions correspond to the key requirements of the SEA Directive, therefore clearly demonstrating compliance with the Directive's requirements – see Table 2.

**Table 2: Meeting the requirements of the SEA Directive**

Key questions	Corresponding requirement of the SEA Directive (the 'environmental report' must include...)
What's the policy context?	<i>"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"</i> (Annex I(a))
What are the key sustainability objectives that we need to consider?	<i>"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"</i> (Annex I(e))
What's the situation now (including any identified problems)?	<i>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</i> (Annex 1(b)) <i>"the environmental characteristics of areas likely to be significantly affected"</i> (Annex I(c)) <i>"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC"</i> [NB problems relating to European sites are addressed through Habitats Regulations Assessment] (Annex I(d))
What will be the situation without the plan?	<i>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</i> (Annex I(b))
What will be the situation with the plan?	<i>"the likely significant effects (1) on the environment, including on issues <u>such as</u> biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the</i>

Key questions	Corresponding requirement of the SEA Directive (the 'environmental report' must include...)
	<i>interrelationship between the above factors</i> [our emphasis] <b>(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</b> (Annex I(f))
How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?	<b>"the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme"</b> (Annex I(g))
How can we best monitor the plan's impacts?	<b>"a description of the measures envisaged concerning monitoring..."</b> (Annex I(i))

2.3.7 This Sustainability Appraisal has been undertaken on the following main elements of the Core Strategy Issues and Options document: strategic objectives, proposed policy areas, growth options around Harlow and the employment options. These are set out in Parts 4 and 6 of the Core Strategy Issues and Options Paper.

2.3.8 The appraisal of strategic objectives, proposed policy areas, growth options around Harlow and the employment options was carried out using the SA framework as defined in the Sustainability Appraisal Scoping Report and set out in section 2.4. The appraisal itself was a qualitative exercise based on the professional judgement of Scott Wilson drawing on available evidence. Available evidence included the Scoping Report and the evidence base developed for the sustainability test of the Harlow Area Options Appraisal study.

2.3.9 ***In appraising the Issues and Options an important point to remember is that it is only the likely significant effects of the plan, not all possible effects that need to be identified. Ultimately, the significance of an effect is a matter of judgement and should require no more than a clear and reasonable justification.***

2.3.10 The compatibility or performance of the strategic objectives, spatial options, employment options and proposed policy areas against the SA framework was indicated according to the criteria set out in Table 3.

**Table 3: Performance Key**

Key
Positive impact / Compatible (+)
Neutral impact or a balance of positive and negative impacts / No relationship between objectives (0)
Uncertain impact or insufficient information on which to determine impact / Compatibility uncertain (?)
Negative impact / Incompatible (-)

2.3.11 When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Cumulative nature of effects;

- Magnitude and spatial extent of the effects; and
- Value and vulnerability of area likely to be effected.

### Approach to testing the compatibility of strategic objectives

- 2.3.12 The Government's *Practical Guide to the Strategic Environmental Assessment Directive*<sup>7</sup> suggests that it may be useful to test the compatibility of the SA objectives (in this case the SA framework provided by the agreed topics, but not the spatial areas) with the strategic objectives of the plan. This will help to refine the Core Strategy objectives. This appraisal will also help to identify and clarify any tensions between the parts of the SA framework and the strategic objectives of the plan so that subsequent decisions are well informed, and mitigation or alternatives can be considered.
- 2.3.13 The approach adopted in this SA to test the compatibility of the strategic objectives is to identify and comment on areas which are compatible, incompatible and areas where there are no links. An example of how this approach has been used for this SA is shown in Table 4.

**Table 4: Testing compatibility between SA framework topics and Issues and Options strategic objectives (example)**

Testing Compatibility				
	Issues & Options Strategic Objective 1	Issues & Options Strategic Objective 2	Issues & Options Strategic Objective 3	Issues & Options Strategic Objective n
Topic 1	✓	✓	0	*
Topic 2	*	0	?	0
Topic 3	?	*	✓	✓
Topic n	✓	✓	✓	*

Key
Compatible (✓)
No relationship between objectives (0)
Compatibility uncertain (?)
Incompatible (*)

### Approach to appraising the spatial and employment options

- 2.3.14 As will be discussed further in Chapter 3, in addition to strategic objectives for the District, the Issues and Options document also includes a series of spatial and employment options covering both the District as a whole as well as particular parts of East Hertfordshire and Epping Forest Districts. SA has a key role to play to inform the evaluation of alternatives. It provides a powerful means of showing decision makers, and the public, that the eventual plan is the most appropriate given reasonable alternatives.

<sup>7</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*  
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf> (accessed 5 March 2010).

- 2.3.15 To help identify and assess the likely effects of the different options, a performance table has been used to provide a visual identification of impacts with a more detailed narrative explaining the rationale behind the identification of significant effects. The likely significant negative and uncertain effects were then commented on further to provide additional information on the nature of the impacts. The performance key that has been used is shown in Table 3.

### **Approach to appraising the proposed policy areas**

- 2.3.16 The Scoping Report identified 'What issues should be a particular focus for the appraisal?'. When identifying impacts of proposed policy area options against the SA framework these issues were referred to.
- 2.3.17 The detail of these policies will come at a later stage of the development process and will be instrumental in the determination and identification of sustainability impacts. The developing policy options were appraised against the SA framework spatial areas (paragraph 2.4.2) and the SA framework topics (paragraph 2.4.3).

### **Assumptions and / or difficulties undertaking certain parts of the appraisal**

#### **Principles directing growth**

- 2.3.18 There were a number of uncertainties and difficulties appraising the Issues and Options Paper. This is particularly the case for Part 5 of the Issues and Options because the paper does not set out any specific details on the suggested approach to the overarching principles directing new development. Furthermore, there are no details on the locations where densities could be increased, whether undeveloped and underused open spaces should be used for development before the Green belt, and what role Green Wedges should play in the future development of Harlow. As such the likely significant effects of these options cannot be appraised at this stage. This is not uncommon for an Issues and Options Paper. However, it is important that future iterations of the Core Strategy are clearer on the approach so to allow the Sustainability Appraisal to appraise their impact.

#### **Spatial options and proposed policy areas**

- 2.3.19 There were a number of uncertainties identified regarding the impact of the spatial options against the SA framework. This was 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 adapting to climate change. In addition, undertaking specific measures to plan for a sustainable community could result in positive impacts on community wellbeing.
- 2.3.20 Similarly, greater detail on the exact nature and geographical steer in terms of infilling proposed within Harlow's existing development would be required to understand the combined impacts of each option. In particular, the impact on the neighbourhoods within Harlow as a result of infilling and in relation to new development in potential growth areas is unclear. Please see paragraph 2.3.18 for more details.
- 2.3.21 In addition, because the spatial options cross district boundaries, as mentioned in paragraph 2.3.8 we needed to draw on the evidence base developed for the sustainability test of the Harlow Area Options Appraisal study.

- 2.3.22 At this stage of the Core Strategy, proposed policy areas were identified. The detail of these policies will come at a later stage of the development process and will be instrumental in the determination and identification of sustainability impacts.

### **Employment options**

- 2.3.23 At this stage the exact level and type of employment to be provided in the District is unclear. However, the Issues and Options Paper does make reference to providing for a substantial increase in provision to assist regeneration objectives and secure growth in key sectors and clusters. The Core Strategy also highlights the importance of Harlow remaining competitive, responding to changing market demands and capitalising on emerging sectors. The Core Strategy indicates that some of the existing employment sites may require some intervention to enable them to reach their full potential and adapt to changing economic structures and business needs. The Core Strategy also highlights that the role, function and location of existing employment sites may need to be reviewed to ensure that the Council's regeneration and economic development goals are achieved.
- 2.3.24 Appraising the full implications of the employment approach is difficult at this stage because more clarity is required on the exact nature of future employment provision in the District. Having said this, the Core Strategy does discuss the suitability of some areas to accommodate any new employment provision needed. However, there are some limitations to this appraisal at this stage.
- 2.3.25 The lack of information detailing the spatial extent of the employment options for Option 2 made the appraisal of this option particularly difficult and hence comments were made regarding Option 2 are necessarily broad in nature. Similarly for Option 3, it is not clear whether 'appropriate locations' infer within the existing urban fabric or within new designations (yet to be determined) on, for example, green field land. Option 6 – assumed to be a combination of Options 2 and 3 – is therefore difficult to appraise for the same reasons. Option 4, as for Option 3 is equally difficult to appraise due to lack of spatial details. Option 5 representing the combination of Options 1 to 4, is likely to result in a balance of impacts identified for the other options to a greater or lesser degree depending on their representative contribution.
- 2.3.26 The assessment assumes for Option 1 that the allocated provision in the Local Plan, i.e. the land north of Nortel Networks and Newhall, are not classified within the "Eastern Growth Area"; and that Option 2 refers to employment growth being evenly distributed and provided as part of the integral fabric of the proposed spatial options for housing delivery (which does include the Eastern Growth Area).
- 2.3.27 Option 3 and Option 4 are assumed to represent smaller employment areas that could potentially be located anywhere - in existing areas, allocated areas or new designated areas - in order to meet specific local needs. It is presumed that Option 3 and 4 are NOT standalone options but would be delivered as additional provision to Option 1, 2 or 6. It is also assumed that Option 3 would require specific allocated areas of a certain size for delivery as opposed to Option 4 whereby live-work units could be more easily allocated in smaller tracts of land or integrated within existing or proposed residential areas.

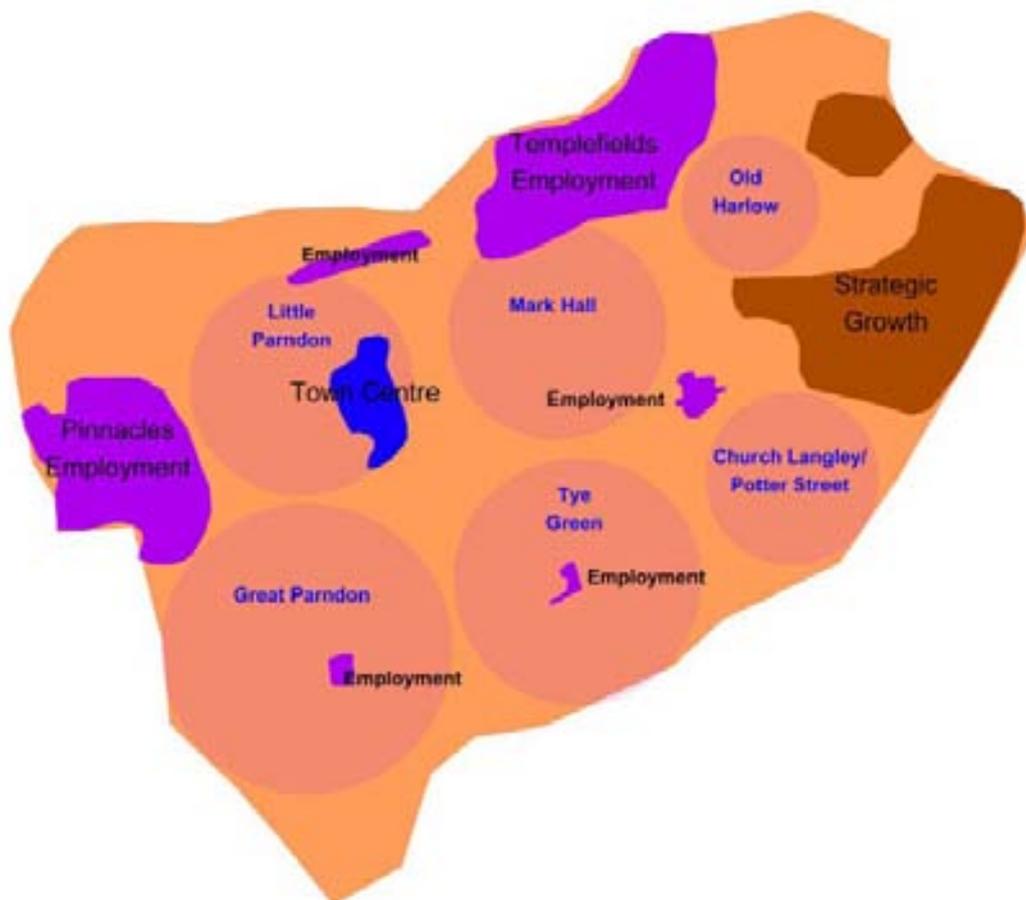
## 2.4 SA framework

2.4.1 The appraisal has been carried out using the SA framework that consists of spatial areas and topics.

2.4.2 The spatial areas (as shown in Figure 2) are:

- Town Centre
- Eastern growth area
- Neighbourhoods
- Industrial and employment areas

**Figure 2: Harlow District Spatial Function Areas**



2.4.3 The topics 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

## 2.5 Integration of SA with other assessments

2.5.1 The previous section sets out our approach to undertaking the SA. This section provides the methodology for the integration of SA with other assessments (which should, as appropriate, include Equality Impact Assessment (EqIA) and Health Impact Assessment).

### Habitats Regulations Assessment / Appropriate Assessment (HRA / AA)

2.5.2 Our methodology is consistent with the requirements of the *Planning and Compulsory Purchase Act 2004*, the *European Directive 2001/42/EC* (the “SEA Directive”) and the *Conservation (Natural Habitats, &c) (Amendment) (England and Wales) Regulations 2006 (Habitats Regulations)*. In practice there will be little integration between the SA and HRA / AA processes beyond the evidence gathering stage. In the Scoping Report we included a **European Sites** chapter that provides the methodology, evidence base and scope for the HRA / AA. A separate HRA / AA Screening Report has been prepared for the Core Strategy Issues and Options.

### Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA)

2.5.3 Methodologies promoted for stand-alone processes of EqIA (see Box 1) and HIA (see Box 2) tend to be closely comparable to the process set out in government guidance on SA. As a result, these assessment exercises can be relatively easily incorporated into the SA process.

2.5.4 The new PPS12 states that: “Where authorities are required by law or encouraged by government policy to undertake assessments of their plans, such assessments should feed into and be summarised in the sustainability appraisal”.

2.5.5 Although SA can consider the full range of topics, the premise for integrating topic specific assessment exercises is to ensure that some topics receive the attention and prominence in the appraisal process that they warrant (given the plan context) and are given an appropriate level of consideration.

2.5.6 In the Scoping Report, EqIA and HIA have been incorporated within the **Community and wellbeing topic Paper**. The appraisal has considered impacts on equalities and health in light of the information contained in the Scoping Report. These are documented in this report.

### Box 1: Equality Impact Assessment (EqIA)

EqIA aims to anticipate the effects of a plan on different groups within the community (equality target groups). A key driver for EqIA is the Equality Act 2006, which places statutory obligations on public sector organisations to ensure that all equality groups are not discriminated against within public sector service delivery and employment. The Equality Act 2010, a new streamlined public sector equality duty, replaces existing race, disability and gender equality duties and has been extended to cover all strands of discrimination, including measures to tackle socio-economic disadvantage.

Guidance on EqIA suggests a six-stage process of screening, scoping / defining, information gathering, making a judgement, action planning, and publication and review<sup>8</sup>. This very closely matches the SA process, but focuses on the needs of, and impacts on, specific groups and the differential nature and proportionality of impacts.

There are eight identified equality target groups, or equality strands, that are central to the equality agenda:

- race
- gender
- disability
- sexual orientation
- gender reassignment
- age
- religion and or belief
- socio-economic disadvantage.

We will follow the same process for the EqIA as we follow for the SA, i.e. we have prepared a topic paper 'Community and Wellbeing' that includes equality and diversity for inclusion in the Scoping Report and later asks how the options and preferred options / policies will impact on equality issues. The EqIA component in the topic paper in the Scoping Report is organised around the eight equality target groups (and any others identified in discussion with the Council). The Council may have decided to involve consultees and groups associated with EqIA in the Scoping Report consultation as well as during the consultation stages of the planning process.

<sup>8</sup> Improvement and Development Agency (2008) *The EqIA process: six-step guide* [online] available at: <http://www.idea.gov.uk/idk/core/page.do?pageId=8017502> (accessed 16 September 2009).

## Box 2: Health Impact Assessment (HIA)

Health Impact Assessment (HIA) is an approach that ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects. HIA is a relatively new tool, and although there is no single agreed national approach or methodology, the value of HIA is increasingly being recognised, both nationally and internationally.<sup>9</sup>

Basic sequential steps involved in carrying out HIA can include:

- Screening
- Scoping
- Appraisal of the potential health effects/impacts
- Decision-making
- Monitoring and evaluation

HIA has been successfully integrated into the statutory process of SA and SEA undertaken for regional, sub-regional and local planning policy. In these instances the health input into policies has been strengthened.

<sup>9</sup> London Health Commission (no date). *Health Impact Assessment* [online] available at: <http://www.london.gov.uk/lhc/hia/> (accessed 4 June 2009).

## 3 The Core Strategy

3.1.1 The statutory spatial development plan for Harlow DC is called the Local Development Framework (LDF) and is made up of a portfolio of documents, including the Core Strategy Development Plan Document (DPD). The Core Strategy is the principal document in the LDF and, once adopted, will set out the District's future development over the next 15 years. In particular, it will be used to identify and propose development of strategic importance to the District. Importantly, the other documents contained in the LDF must be in general conformity with the Core Strategy.

3.1.2 The District has reached the issues and options stage in the development of the Core Strategy. The Core Strategy issues and options document is based around seven main parts:

1. The context
2. The issues
3. The strategic challenge
4. The vision, themes and objectives
5. Developing principles to direct growth
6. Growth around Harlow: appraising options
7. Developing a delivery strategy

3.1.3 The components for the Sustainability Appraisal are found Parts 4 and 6. They are outlined in the following sections.

## 3.2 The vision, themes and objectives

### The Core Strategy objectives

3.2.1 The Core Strategy identifies five themes under which sit 26 strategic objectives. The strategic objectives aim to address a range of issues identified for each of the five themes to underpin the development of a series of policies and proposals to deliver the vision for Harlow. The themes and strategic objectives are shown in Table 5.

**Table 5: Themes and strategic objectives of the Core Strategy**

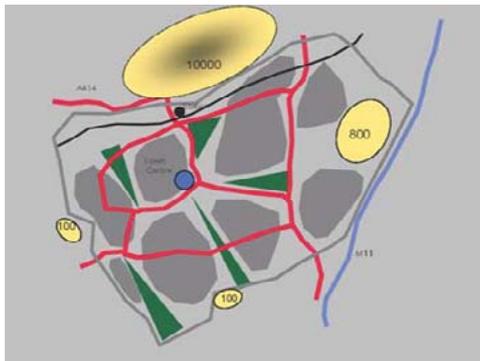
Themes	Strategic objectives
1. Placeshaping – Enhancing the quality of the built and natural environment	<ul style="list-style-type: none"> <li>Objective 1: Protecting, enhancing and promoting access to/use of the Green Infrastructure Network (including Green Wedges, landscape and sites of nature conservation importance)</li> <li>Objective 2: Creating accessible, safe and attractive public spaces</li> <li>Objective 3: Delivering high quality urban design and architecture and protecting and enhancing buildings and places of heritage value</li> <li>Objective 4: Promote growth in sustainable locations</li> <li>Objective 5: Secure regeneration at key locations, such as the Town Centre and neighbourhood centres to improve environmental character and economic prosperity</li> </ul>
2. Housing – Delivering housing at the right scale, of the right type and in the right location to meet the needs of the whole community	<ul style="list-style-type: none"> <li>Objective 6: Identify sites in Harlow to meet local needs and aspirations</li> <li>Objective 7: Meeting the housing needs of the community both now and in the future</li> <li>Objective 8: Providing homes for a range of tenures</li> <li>Objective 9: Providing a range of house types</li> <li>Objective 10: Improve the quality of homes in the district</li> <li>Objective 11: Regenerating existing neighbourhoods including priority estates</li> </ul>
3. Prosperity – Securing economic growth and regeneration in order to improve employment and educational opportunities in the town to reflect its strategic role	<ul style="list-style-type: none"> <li>Objective 12: Enhancing and reinforcing Harlow's sub regional role and improving the town's image</li> <li>Objective 13: Meeting the employment needs of the town</li> <li>Objective 14: Reinforcing Harlow's reputation as a key centre for Research and Development</li> <li>Objective 15: Enhancing and diversifying educational and skills training opportunities in the town</li> <li>Objective 16: Encourage diversification and investment in the town's employment base</li> <li>Objective 17: Regenerating the town centre and reinforcing its retail role in the sub region</li> <li>Objective 18: Protect and enhance existing retail in neighbourhood centres and hatches</li> </ul>
4. Lifestyles – Meeting the leisure, recreational and cultural requirements of the community in a sustainable manner	<ul style="list-style-type: none"> <li>Objective 19: Protecting and enhancing sporting, leisure and recreation opportunities</li> <li>Objective 20: Provide and enhance cultural opportunities in the town</li> </ul>
5. Infrastructure – Ensuring growth and regeneration is supported by appropriate levels of infrastructure provision	<ul style="list-style-type: none"> <li>Objective 21: Reduce need to travel by ensuring new development is located close to existing or new neighbourhood centres and good public transport networks</li> <li>Objective 22: Improve transport links to secure good access to a range of community facilities, neighbourhood centres, employment areas and green spaces</li> <li>Objective 23: Secure new and enhanced community infrastructure including educational facilities to meet the needs of existing and future residents</li> <li>Objective 24: Enhance and promote the role of Harlow as a transport interchange along the M11</li> <li>Objective 25: Work with key providers to ensure that the infrastructure requirements to serve new development can be met</li> <li>Objective 26: Ensure new development is provided through a phased approach in order not to overload existing infrastructure capacity</li> </ul>

## 3.3 Spatial Options

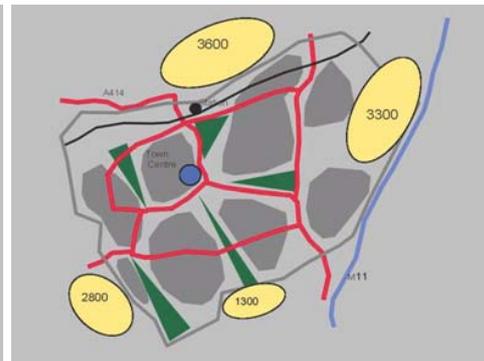
- 3.3.1 The spatial options explore how growth requirements as set out in the East of England Plan could be accommodated. The Council anticipates that around 5,500 homes could be accommodated on sites within Harlow, mostly on land that has previously been developed and on land that has already been allocated for development in the Adopted Replacement Harlow Local Plan. Some growth will also be linked to a range of regeneration initiatives including the Town Centre North proposals and the regeneration of existing Neighbourhood Centres and the Priority Estates. These areas currently provide a focus for community activities and uses surrounded by established residential areas that enable residents to live close to their places of work, to shops and leisure and other community facilities. The opportunity will, therefore, be taken to examine the provision of additional new homes to assist regeneration objectives through urban renaissance as well as meeting the community's housing needs. The Council recognises that additional opportunities may arise within the 'urban area boundary'. The remainder of the growth, approximately 11,000 homes, will need to be accommodated through urban extensions to the town some of which will be within the administrative areas of Epping Forest and East Hertfordshire District Councils. Another issue that will be considered will be the need to provide sites to meet the needs of Gypsies and Travellers.
- 3.3.2 The spatial options examine possible broad locations outside the existing built up area of Harlow that could be brought forward for development. There are six spatial options. Please see figure 3:
- Option A – RSS: Northern Led
  - Option B – Policy led 2
  - Option C – Combination criteria led
  - Option D – Regeneration led
  - Option E – Sustainable transport led
  - Areas of search and potential housing distributions

**Figure 3: Spatial Options**

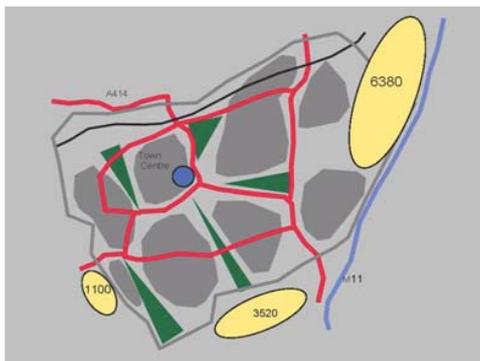
**RSS: Northern led approach**



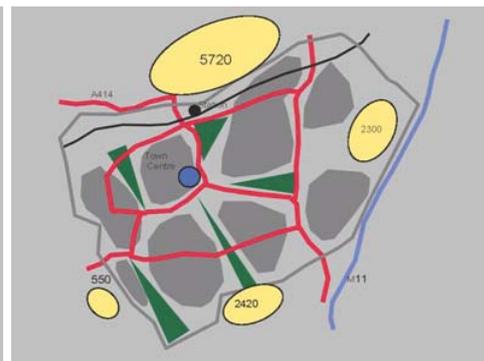
**Policy led 2 approach**



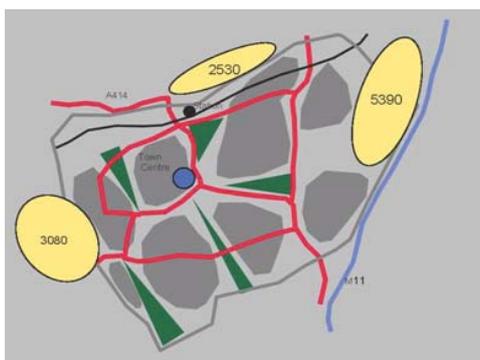
**Criteria led approach**



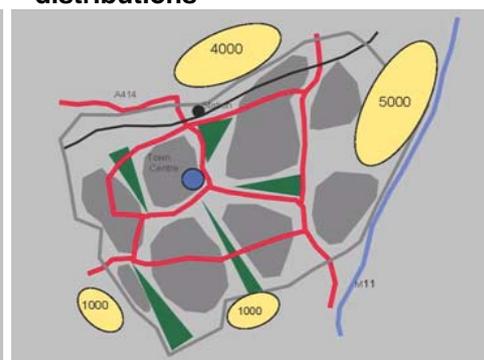
**Regeneration led approach**



**Transport led approach**



**Areas of search and potential housing distributions**



### 3.4 Employment options

3.4.1 The Core Strategy discussed the role and function of existing employment areas to ensure that the Council's regeneration and economic development goals are achieved. As well as asking whether the existing employment areas meet current and future needs, the Core Strategy also outlines areas of search to accommodate different employment needs. Although at least some of the employment growth from the provision of 16,000 dwellings in the Harlow Area could be

accommodated within existing employment areas and allocations, some forms of employment land would not be easily accommodated and many employment needs are met through a range of smaller sized businesses with different space requirements. The Issues and Options document identifies six options to accommodate new employment:

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

## 3.5 Developing policy options

3.5.1 The Issues and Options document identifies proposed policy areas that will be refined to develop core policies. Potential policy areas are grouped according to the five Core Strategy themes and strategic objectives as shown in Table 6.

**Table 6: Proposed policy areas for the Core Strategy**

Theme	Strategic objective	Proposed policy areas
Placeshaping	Protecting, enhancing and promoting access to/use of the Green Infrastructure network (including Green Wedges, landscape and sites of nature conservation importance)	<ul style="list-style-type: none"> <li>• Designation of sites important for nature conservation purposes and biodiversity</li> <li>• Define the role and function of Green Wedges</li> <li>• Protection and enhancement of the setting of the River Stort and other significant landscape features</li> </ul>
	Creating accessible, safe and attractive public spaces	<ul style="list-style-type: none"> <li>• Creation and enhancement of footpath and cycleway links between green spaces, adjoining neighbourhoods and the countryside</li> <li>• Ensuring public spaces are safe and accessible for the community</li> <li>• Promotion of secure by design within new development</li> <li>• Promotion and integration of good quality public art within development and appropriate public spaces</li> <li>• Definition and protection of the network of green spaces in the district</li> <li>• Provision of new and enhancement of existing public spaces across the town</li> </ul>
	Promote growth in sustainable locations	<ul style="list-style-type: none"> <li>• Promotion of the development of brownfield land at appropriate location within the town</li> <li>• Establish criteria to guide development to the most sustainable locations</li> <li>• Definition of the extent of the Green Belt</li> <li>• Avoid development in areas identified at risk from flooding and support flood retention initiatives</li> <li>• Promotion of mixed use development in</li> </ul>

Theme	Strategic objective	Proposed policy areas
		neighbourhood centres and, where appropriate, at hatches
	Delivering high quality urban design and architecture and protecting and enhancing buildings and places of heritage value	<ul style="list-style-type: none"> <li>• Protection and enhancement of listed buildings and Conservation areas</li> <li>• Protection of Scheduled Ancient Monuments and Registered Parks and Gardens</li> <li>• Protection of the distinct architectural character and design of Harlow</li> <li>• Acknowledging the role of the design principles established by Gibberd in securing sustainable development</li> <li>• Encouraging and promoting best practice in the design of new buildings to include energy conservation measures, renewable energy technologies and the provision of lifetime homes</li> <li>• Use of appropriate materials in new buildings</li> <li>• Promotion of Sustainable Drainage to alleviate flooding</li> <li>• Encourage crime prevention measures to be incorporated into the design of new development</li> </ul>
	Secure regeneration at key locations to improve environmental character and economic prosperity	<ul style="list-style-type: none"> <li>• Promoting urban renewal measures to secure regeneration within the town</li> <li>• Promotion of the regeneration of the town centre, neighbourhood centres and priority estates</li> <li>• Provision of appropriate mechanisms to secure funding to assist regeneration</li> </ul>
Housing	Identify sites in Harlow to meet local needs and aspirations	<ul style="list-style-type: none"> <li>• Provision of housing to meet local needs and aspirations</li> <li>• Indication of location of growth</li> <li>• Ensuring infrastructure provision keeps pace with house completions</li> <li>• Where possible build on previously developed land first (sequential approach)</li> <li>• At appropriate locations regenerate existing residential areas to improve the quality and supply of housing</li> </ul>
	Meeting the housing needs of the community both now and in the future	<ul style="list-style-type: none"> <li>• Provision of affordable housing to meet Harlow's needs now, and in the future reflecting the viability of sites</li> <li>• Provision for elderly and disabled people and other special needs housing</li> <li>• Provision of additional pitches for gypsies and travellers</li> </ul>
	Providing a range of house types	<ul style="list-style-type: none"> <li>• Ensuring new housing development provides a range of dwelling types to cater for all the community</li> <li>• Making the best use of land by developing minimum density requirements</li> </ul>
	Providing homes for a range of tenures	<ul style="list-style-type: none"> <li>• Addressing issues associated with dwellings in multiple occupation</li> <li>• Securing a mix of housing tenures to reflect Harlow's current and future needs</li> </ul>

Theme	Strategic objective	Proposed policy areas
	Improve the quality of homes in the district	<ul style="list-style-type: none"> <li>• New development in existing areas to reflect the character of the area</li> <li>• Provision of lifetime homes</li> <li>• Ensure all homes are built in accordance with the “Building for Life” criteria</li> <li>• Ensure all homes are built in accordance with the “Code for Sustainable Homes” criteria</li> </ul>
	Regenerating existing neighbourhoods with a focus on priority estates	<ul style="list-style-type: none"> <li>• Identification of areas that are a priority for regeneration</li> <li>• Provision of a planning policy framework to support regeneration initiatives within the town</li> </ul>
Prosperity	Enhancing and reinforcing Harlow’s sub regional role and improving the image of the town	<ul style="list-style-type: none"> <li>• Develop and diversify the role of Harlow as a gateway to Europe and as a major location for employment, retail and leisure</li> <li>• Reinforce the role of the Town Centre as a major destination</li> <li>• Preparation of Area Action Plans and/or development briefs to reinforce the role and viability of neighbourhood centres</li> <li>• Promotion of mixed use development and higher densities within and around existing centres</li> <li>• Securing environmental improvements around neighbourhood centres including upgrades to the public realm</li> <li>• Restructuring the town centre to create permeability across town-centre and linkages with other centres</li> <li>• Improving the quality of employment space</li> <li>• Promoting enterprise and business start ups</li> </ul>
	Meeting the employment needs of the town	<ul style="list-style-type: none"> <li>• Promotion of Harlow as a strategic employment location</li> <li>• Identification of new employment areas to meet current and future needs</li> <li>• Retaining existing employment sites in their existing uses</li> <li>• Provision of a range of sites to meet employment needs</li> <li>• Enhancing transport linkages and other infrastructure to support business development</li> </ul>
	Reinforcing Harlow’s reputation as a key centre for Research and Development	<ul style="list-style-type: none"> <li>• Securing investment by strengthening and identifying opportunities for growth in the town</li> <li>• Facilitating research and development and growth at appropriate locations</li> </ul>
	Enhancing and diversifying educational and skills training opportunities in the town	<ul style="list-style-type: none"> <li>• Promotion of Harlow as a university town</li> <li>• Facilitate and support the expansion of existing and the provision of new educational facilities in the town</li> <li>• Recognising the links between the further education and emerging sectors to meet the future skill requirements of employers</li> </ul>
	Encourage diversification and investment in the towns employment base	<ul style="list-style-type: none"> <li>• Identification of locations within the existing town and urban extensions to attract new employment opportunities to the town</li> </ul>

Theme	Strategic objective	Proposed policy areas
		<ul style="list-style-type: none"> <li>Promote mixed use development at appropriate locations</li> </ul>
	Regenerating the town centre and reinforcing its retail role in the sub region.	<ul style="list-style-type: none"> <li>Defining key retail areas within the town</li> <li>Identify sites in the town centre to accommodate new retail development</li> <li>Recognising the role other uses can play in reinforcing and adding vitality to the primary retail function of the town centre</li> </ul>
	Protecting and enhancing neighbourhood centres and hatches	<ul style="list-style-type: none"> <li>Protecting and reinforcing primary, secondary and specialist retail areas in the town, neighbourhood centres and hatches</li> </ul>
Infrastructure	Reduce need to travel by ensuring new development is located close to neighbourhood centres and good public transport networks	<ul style="list-style-type: none"> <li>Consider the location of new development in a sequential manner</li> <li>Addressing traffic congestion in the town</li> <li>Make appropriate provision for car parking in development</li> <li>Enhancing public transport provision to meet the needs of the community</li> </ul>
	Improve transport links to secure good access to a range of community facilities, neighbourhood centres, employment areas and green spaces	<ul style="list-style-type: none"> <li>Improving bus, cycleway and footpath links in the town</li> <li>Encourage provision of community facilities on good transport corridors</li> </ul>
	Secure new and enhanced community infrastructure to meet the needs of existing and future residents	<ul style="list-style-type: none"> <li>Ensuring new development is supported by a range of infrastructure including education, health, social and other uses to meet community needs</li> <li>Securing developer contributions for infrastructure provision</li> <li>Ensure there is appropriate provision of primary care and public health facilities</li> <li>Support the expansion of health facilities in existing health centres</li> </ul>
	Enhance and promote the role of Harlow as a transport interchange along the M11	<ul style="list-style-type: none"> <li>Securing improvements to rail and bus capacity to meet existing and future needs</li> <li>Refurbishment and/or redevelopment of the rail and bus stations</li> <li>Ensuring strategic and other road capacity can meet future development requirements of the town</li> <li>Enhancement of public transport and cycleway links to rail and bus stations</li> </ul>
	Work with key providers to ensure that the infrastructure requirements to serve new development can be met	<ul style="list-style-type: none"> <li>Development of policies and initiatives to secure the provision of planned infrastructure</li> <li>Promotion innovative transport measures such as Travel plans</li> </ul>
	Ensure new development is provided through a phased approach in order not to overload existing infrastructure capacity	<ul style="list-style-type: none"> <li>Development of phasing policies</li> <li>Delivery of mechanisms to secure provision</li> <li>Encouraging partnership working to prioritise delivery and funding</li> </ul>
Lifestyles	Protecting and enhancing sporting,	<ul style="list-style-type: none"> <li>Ensure adequate provision of facilities for formal</li> </ul>

Theme	Strategic objective	Proposed policy areas
	leisure and recreation opportunities for all	and informal recreation in new and existing developments which are accessible <ul style="list-style-type: none"> <li>• Provision of public spaces for events and other community uses</li> <li>• Protecting and enhancing allotment provision at appropriate locations</li> <li>• Create, protect and enhance green space provision in the town, in particular, improvements to the Town Park</li> <li>• Enhance the setting of and access to waterways and ponds in particular the River Stort</li> </ul>
	Provide and enhance cultural opportunities in the town	<ul style="list-style-type: none"> <li>• Provide a comprehensive range of social and recreational facilities for young people in new developments</li> <li>• Ensure new community facilities are flexibly designed to accommodate a broad range of activities and are accessible to all</li> <li>• Secure appropriate developer contributions for public art and entertainment provision in new developments</li> <li>• Secure the retention of cultural and entertainment facilities in the town, including a new theatre</li> </ul>

## 4 Summary of the Scoping Report

### 4.1 Introduction

4.1.1 The Scoping Report outlined in detail the spatial areas and topics of the SA framework and serves as an important reference document for the Sustainability Appraisal. This chapter summarises and signposts the content of this document:

- What's the policy context?
- What's the situation now?
- What's the situation without the plan?
- What issues should be a particular focus for the appraisal?.

### 4.2 What's the policy context?

4.2.1 One of the key requirements of the SEA Directive is to give “an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes”. This information should help the Plan take into account and reflect the policies, obligations and issues that affect the Plan's area of influence. The policy context is set out in detail in the Scoping Report<sup>10</sup> and includes a range of European, national, regional and local plans, programmes, policies, strategies and initiatives.

4.2.2 The East of England Plan<sup>11</sup> provides the overall planning framework for the region and Local Development Frameworks must be in conformity with the broad planning policies and growth requirements that it sets out. **Policy SS3** of the Plan identifies Harlow as one of a number of Key Centres of Development and Change (KCDC) in the region. KCDCs are intended to reflect the “polycentric nature of the East of England” and its arrangement of small and medium sized towns and cities surrounded by more rural areas which look to those towns for employment and higher level services. Harlow is identified as a main driver of economic growth in the region where there is potential to build on existing social infrastructure. The Plan states that:

*“The expansion of Harlow provides a major opportunity to address the substantial need for economic and physical regeneration of the post war new town, to meet a significant proportion of the development needs of the London Stansted Cambridge Peterborough growth area to 2021 and beyond, including in regard to employment activities related to the growth of Stansted Airport and housing, and to enhance Harlow's sub-regional status as an important centre for the surrounding areas of Essex and Hertfordshire”.*

4.2.3 The Plan outlines a strategy for Harlow in more detail in **Policy HA1: Harlow Key Centre for Development and Change**. This includes promoting the “renaissance of the new town” by developing its role as a major regional housing growth point, major town centre and strategic employment location to 2021 and beyond. In order to fulfil the strategy, the policy states that

<sup>10</sup> See

<http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/sustainability%20appraisal%20scopi.aspx>

<sup>11</sup> GOEE (2008) *East of England Plan* [online] available at:

[http://www.gos.gov.uk/goee/docs/Planning/Regional\\_Planning/Regional\\_Spatial\\_Strategy/EE\\_Plan1.pdf](http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/Regional_Spatial_Strategy/EE_Plan1.pdf) (accessed 23 February 2010).

regeneration and redevelopment of both the existing town and any urban extensions should be combined with transport measures and enhancement and conservation of green infrastructure. The additional 16,000 dwellings to be delivered between 2001 and 2021 should be delivered both within the existing area of the town, through renewal, redevelopment and also mixed use development in the town centre, and also through urban extensions to the north, east, and on a smaller scale the south and west. In order to accommodate the urban extensions, the strategy includes a green belt review and highlights the need to adhere to the Gibberd Plan principles and to maintain the landscape setting of Harlow.

- 4.2.4 The spatial distribution of housing between the three Districts will be informed by the options appraisal technical study. According to **Policy HA1**, the DPDs for these Districts will *"determine the appropriate distribution between the existing town and the urban extensions, including the more detailed location and scale of required development. The objective is to put in place a development strategy which promotes Harlow's regeneration, is as sustainable as possible, and can be implemented at the required pace."* Factors to be taken into account include *"making use of urban capacity"*, and *"the differing implementation issues in regard to the urban extensions"*, including transport implications.
- 4.2.5 **Policy HA1** also sets out the importance of the network of multi-functional greenspaces within and around Harlow, in particular Harlow's characteristic 'green wedges' and also the recreation, biodiversity and town character and setting roles of greenspace in the district. Where development proceeds the effort should be made to both retain and enhance environmental and historic features and to capitalise upon development in the Stort Valley.
- 4.2.6 The Strategy states that the town centre and employment areas should be developed; strengthening Harlow's retail offer and the town centre's regional hierarchy position, enhancing the role of Harlow as a key centre for further and higher education and research based institutions and capitalising upon the growth of Stansted Airport. Development should provide for growth of Harlow's established sectors and clusters and there is a need to assist the growth of small and medium sized enterprises and attract new economic development and innovation.
- 4.2.7 **Policy HA1** sets out transport priorities for Harlow. These include a major increase in the use of public transport, walking and cycling, and addressing traffic congestion without encouraging an increase in car use. Access between Harlow and London, Stansted and Cambridge should be enhanced, and measures put in place to support the town's regeneration and growth and to improve access to the strategic highway network from key employment sites.
- 4.2.8 Other policies that specifically refer to Harlow include:
- **Policy SS5: Priority Areas for Regeneration**, identifies Harlow as a town with significant areas of deprivation and that LDDs and relevant non-statutory plans should set out policies to tackle the problems of economic, social and environmental deprivation.
  - The Plan states that at least 508,000 net additional dwellings should be provided by LPAs within the region over the period 2001 to 2021. **Policy H1** sets out the indicative minimum that must be provided within Harlow over this period as 16,000. This figure represents total housing growth at Harlow, including urban extensions in Epping Forest and East Herts Districts, split between the three districts as determined through DPDs.

- A Single Issue Review to the Plan<sup>12</sup> in respect of **Policy H3: Provision for Gypsies and Travellers**, states that Harlow District needs to provide a minimum of 15 additional pitches between 2006 and 2011.
- **Policy E1: Job Growth** identifies a requirement of 56,000 jobs apportioned between six Essex Local Authorities including Harlow.
- **Policy E3: Strategic Employment Sites** lists Harlow as a regionally strategic location to provide sites in order to assist regeneration and ensure growth in key sectors and clusters.
- **Policy E7: The Region's Airports** states that employment development not directly related to the Airport's operation should be located at Harlow and other nearby towns.
- **Policy ENV1** identifies the Lea Valley Regional Park as an area of landscape, ecological and recreational importance. **Policy ENV3: Biodiversity and Earth Heritage** also refers to the Harlow Area, stating that LDDs should provide for the creation and maintenance of a network of multi-functional greenspaces around the town which take into consideration the principles of the Green Infrastructure Plan for Harlow.<sup>13</sup> The Stort Valley in particular is highlighted as a major green infrastructure opportunity between Harlow Town Centre and development to the north of Harlow within East Herts.
- **Policy T5** states that *"Improvements to inter-urban public transport should be focussed on the Regional Transport Nodes"*, with Harlow listed as a Node.
- **Policy T15: Transport Investment Priorities**, identifies the London to Stansted corridor, including Harlow and access to Stansted Airport, amongst a number of areas likely to come under increasing transport pressure as a result of underlying traffic growth and the development strategy of the RSS.

4.2.9 Harlow's Sustainable Community Strategy – the Harlow 2020 Vision<sup>14</sup> must be taken into account in preparing the LDF. This document sets out the Local Strategic Partnership's vision for Harlow which is:

*"A clean, safe, sustainable and healthy town with good educational prospects for its citizens, a variety of homes and jobs to meet local needs, and a range of sporting, leisure and cultural opportunities contributing to a higher quality of life".*

4.2.10 For further details on policy context for each of the spatial areas and topics please refer to the Scoping Report.

## 4.3 What's the situation now?

4.3.1 The situation now is set out in the Scoping Report which provides the current baseline for each of the spatial areas and topics of the SA framework. This document may be accessed from the Harlow Council website.<sup>15</sup>

<sup>12</sup> GOEE (2009) *Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England* [online] available at:

[http://www.gos.gov.uk/goeast/planning/regional\\_planning/687221/?a=42496](http://www.gos.gov.uk/goeast/planning/regional_planning/687221/?a=42496) (accessed 23 February 2010).

<sup>13</sup> Harlow Council (2005) *A green infrastructure plan for the Harlow Area* [online] available at:

<http://www.harlow.gov.uk/default.aspx?page=8615> (accessed 23 February 2010).

<sup>14</sup> Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 30 April 2010).

## 4.4 What's the situation without the plan?

4.4.1 The situation without the plan is set out in the Scoping Report for each of the spatial areas and topics of the SA framework. This document may be accessed from the Harlow Council website.<sup>16</sup>

## 4.5 What issues should be a particular focus for the appraisal?

4.5.1 Table 7 provides a consolidation of what issues should be a particular focus for the appraisal as identified in the Scoping Report. These issues will provide prompts throughout the appraisal in order to determine impacts on the SA framework as we consider the Issues and Options.

**Table 7: Issues for particular focus in the appraisal**

Spatial area / topic	Key sustainability issues
Town Centre	<ul style="list-style-type: none"> <li>• The need to regenerate the town centre to address issues with connectivity, vitality, viability and a lack of a unique sense of place. These include: <ul style="list-style-type: none"> <li>○ The need to improve the town centre's physical environment including public realm and landmarks to create character and an identity for the centre</li> <li>○ The need to improve the town centre's economy and retail performance</li> <li>○ The need to increase the mix of uses in the town centre, including residential development</li> <li>○ The need to improve pedestrian access into the town centre</li> </ul> </li> <li>• The need to consider the potential development for Harlow Town Centre North.</li> </ul>
Eastern growth area	<ul style="list-style-type: none"> <li>• The low landscape value of the area</li> <li>• The need to give early consideration to landscape and biodiversity enhancement, recreation provision and access routes</li> <li>• The need to ensure that the eastern growth area provides access to a range of adequate employment opportunities</li> <li>• The need to consider environmental and historic constraints in the area, including: green belt, green wedge, open land, county wildlife sites, historic value – a tumulus and listed buildings, and a small area of flood risk</li> <li>• The need 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>• Scope to extend green wedges between the urban edge of Harlow and new neighbourhoods in the wider countryside, ensuring a continuity of green corridors.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>• Harlow has a characteristic urban structure whereby main neighbourhood areas serve local needs and are divided by green wedges</li> <li>• It is desirable to locate schools, community and health centre facilities within each neighbourhood and within walking distance for residents. It can reduce reliance upon car travel and provide for the less mobile of Harlow's residents. However, it is also important to consider the need to access wider facilities and services from the neighbourhoods, such as the town centre and including the provision of alternatives to private cars</li> <li>• Issues exist relating to connectivity with other neighbourhoods, the out-migration</li> </ul>

<sup>15</sup> See:

<http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/sustainability%20appraisal%20scopi.aspx>

<sup>16</sup> See:

<http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/sustainability%20appraisal%20scopi.aspx>

Spatial area / topic	Key sustainability issues
	<p>of residents for services and facilities, and; a poor perception and appearance of centres. This has undermined the hierarchy of retail centres within Harlow</p> <ul style="list-style-type: none"> <li>• Maintenance and viability of local facilities and services</li> <li>• Maintenance and enhancement of the local distinctiveness and character of the neighbourhoods.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>• The need to appropriately allocate land for employment and industrial use in suitable locations and in the required amount</li> <li>• The need to improve the environmental quality of industrial and employment areas</li> <li>• The need to re-use employment land and allocate land on Previously Developed Land (PDL) where possible.</li> </ul>
Air quality	<ul style="list-style-type: none"> <li>• The need to ensure that inappropriate levels of development or activities which contribute towards lower levels of air quality are not located within an inappropriate proximity to locations approaching objective limits.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>• The need to conserve and enhance biodiversity in Harlow (informed by the Essex Biodiversity Action Plan (BAP))</li> <li>• The need to consider the incorporation of biodiversity enhancements and green infrastructure through Sustainable Drainage Systems (SuDS) design</li> <li>• The need to consider the importance of Green Wedges and green infrastructure to the town's aesthetic appeal and sense of community</li> <li>• The importance of strategic planning to safeguard biodiversity, habitats and European sites placed at risk by recreation and development. (e.g. planning for new recreational resources to buffer increased demand for access to the more sensitive sites)</li> <li>• The recreational, health and general community well-being advantages that biodiversity and green infrastructure can provide.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>• The need to lower GHG emissions</li> <li>• The need to explore alternative ways 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>• The impact of development on surface water flooding</li> <li>• Development within the areas at risk of flooding, adaptation and the mitigation of flood risk, this includes taking into account SFRA findings</li> <li>• The need to consider SuDS design measures and how they may contribute to climate change adaptation and reducing flood risk.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>• The need to take into account pockets of deprivation within Harlow (particularly in the centre compared to the fringes of Harlow) and differences in deprivation, equality and health between different Harlow wards, particularly in light of differing population structures (age, family, ethnicity etc)</li> <li>• The need to ensure that the equality, health and social care needs of a growing and ageing population are met</li> <li>• The need to ensure that the needs of the disabled population in the district are met</li> <li>• The need to consider why female, but not male, life expectancy exceeds the regional average</li> <li>• The need to address health issues of obesity, diabetes and poor levels of healthy eating</li> <li>• The need to tackle issues of crime, particularly harassment charges and violent crime</li> <li>• The need to tackle low levels of physical activity in children and high levels of teenage pregnancy</li> </ul> <p>To consider design measures that will increase community well-being, such as green infrastructure, landscaping and SuDS.</p>

Spatial area / topic	Key sustainability issues
Economy and employment	<ul style="list-style-type: none"> <li>• The need to support initiatives that capitalise on the wider Harlow Sub-Region catchment area</li> <li>• The need to support job creation within Harlow of an appropriate scale and type</li> <li>• To encourage a diversified economy and to increase foreign investment within the District</li> <li>• To address the low levels of skills, training and qualifications within the District</li> <li>• The need to ensure that job creation is matched by the provision of appropriate facilities and infrastructure.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• The need to protect the district's historic environmental assets from inappropriate development</li> <li>• That development should respect the character, appearance and features of historical designations, in addition to the setting and views into or out of these areas.</li> <li>• The need to consider the original concept and design for Harlow as a former New Town.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• To increase the provision of affordable housing</li> <li>• To ensure that the appropriate levels of new dwellings are provided over the plan period</li> <li>• To ensure that that the housing needs of an ageing (and disabled) population are met</li> <li>• The need to provide Gypsy and Traveller pitches</li> <li>• The need to ensure that housing delivery contributes to the regeneration of Harlow.</li> </ul>
Land	<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>• The need to identify, avoid and if appropriate remediate contaminated land in the district</li> <li>• That the District's achievements in reduce, re-use and recycling of waste, are poor in comparison to the county average</li> <li>• The need to consider the regeneration benefits that may result from the growth of Harlow.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• The need to protect the district's landscape assets from inappropriate development</li> <li>• Where development proceeds, particularly in greenfield areas, there is a need to ensure that landscape assets are protected and integrated to maximise their potential amenity value.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Harlow is part of a key transport corridor, is a regional transport node and is part of the Harlow and Stansted / M11 Corridor strategy area for Essex – in terms of transport, it is strategically very well located with further potential and benefit for the District</li> <li>• The current transport infrastructure is under strain, existing strategic transport linkages are currently inadequate and compromise the original town vision for transport and connectivity</li> <li>• The District has a low percentage of home workers and a high percentage of travellers to work. A more sustainable modal shift is required so that levels of private car use for commuting are reduced.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Harlow is located in an area of serious water stress, which will be exacerbated due to climate change and future growth and development</li> <li>• The need to maintain and improve the water quality of Harlow's water courses in line with the Water Framework Directive requirements</li> <li>• The need to ensure distribution and location of new development takes the water supply and sewerage infrastructure into account</li> <li>• The need to reduce per capita consumption of water and maintain high levels of</li> </ul>

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Spatial area / topic	Key sustainability issues
	<p>drinking water quality</p> <ul style="list-style-type: none"><li>• The need to consider SuDS and other water saving and water quality enhancing measures.</li></ul>

## 5 Compatibility of the SA framework and Core Strategy Strategic Objectives

### 5.1 Introduction

- 5.1.1 This section tests the compatibility of the Core Strategy strategic objectives against the SA framework topics.
- 5.1.2 The strategic objectives are designed to address the issues identified under five key themes and represent the goals that the Council aims to meet over the plan period in order to help deliver the Vision for Harlow (see Part 3 for more detail on the Core Strategy).
- 5.1.3 It is important for the objectives of the Core Strategy to be in accordance with sustainability principles. The Government's *Practical Guide to the Strategic Environmental Assessment Directive*<sup>17</sup> suggests that it can be useful to test the compatibility of the SA objectives (in this case the SA framework provided by the agreed topics, but not the spatial areas) with the strategic objectives of the plan. This will help to refine the Core Strategy strategic objectives. This appraisal will also help to identify and clarify any tensions between the parts of the SA framework and the strategic objectives of the plan so that subsequent decisions are well informed, and mitigation or alternatives can be considered.

### 5.2 Compatibility Test

- 5.2.1 CLG Guidance<sup>18</sup> suggests using a matrix to compare the plan objectives with the SA objectives. The Core Strategy sets out 26 strategic objectives under five themes, the complete text for which can be found in Part 3. Compatibility will be considered by comparing the sustainability objectives (and key issues identified in the Scoping Report) against the Core Strategy strategic objectives grouped under the five themes. This is illustrated in Table 8 and briefly discussed below.

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<sup>17</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf> (accessed 5 March 2010).

<sup>18</sup> CLG (no date) *Plan making manual: refining options and assessing effects* [online] available at: <http://www.pas.gov.uk/pas/core/page.do?pageld=156210> (accessed 23 February 2010)

**Table 8: Comparison table to test the compatibility of the Core Strategy strategic objectives and SA framework**

Topics	Core Strategy strategic objectives				
	Placeshaping	Housing	Prosperity	Lifestyles	Infrastructure
Air quality	✓	0	0	0	?
Biodiversity and green infrastructure	✓	?	?	?	?
Climate change (mitigation and adaptation)	✓	?	*	0	?
Community and wellbeing	✓	✓	✓	✓	✓
Economy and employment	✓	✓	✓	0	✓
Historic environment	✓	?	0	?	?
Housing	✓	✓	0	0	✓
Land	✓	*	*	0	?
Landscape	✓	?	?	?	?
Transport	?	?	?	?	✓
Water	✓	*	?	0	✓

Key
Compatible (✓)
No relationship between objectives (0)
Compatibility uncertain (?)
Incompatible (*)

## 5.3 Summary

- 5.3.1 The majority of the strategic objectives under the five themes were either compatible with the SA framework or there was no relationship. In a few cases there were uncertainties and other issues that are outlined briefly below and we have suggested ways to provide clarity. There is no requirement on behalf of the Council to make changes to these objectives. However, where there is a conflict between objectives the Council will need to reach a decision on priorities.
- 5.3.2 Reducing the need to travel is likely to improve air quality, but enhancement of Harlow as a transport interchange could increase emissions and reduce air quality. Increased employment and retail under the Prosperity theme is also likely to increase emissions and waste.
- 5.3.3 Housing, employment and infrastructure could negatively impact upon environmental (e.g. biodiversity, water) and historical assets depending upon where it is located, however, regenerating neighbourhoods (Housing theme) could enhance biodiversity and development design (both housing and infrastructure) could consider how best to incorporate biodiversity-

enhancement measures. In terms of the Housing objectives and housing quality, perhaps the Placeshaping objectives relevant to delivering high quality design should be linked to this. Regenerating the town centre (Prosperity theme) could also integrate sustainable design, incorporate biodiversity enhancement and water conservation measures, particularly given the poor levels of biodiversity in the Town Centre and Harlow's location within an area of water stress. Similarly, the Lifestyles theme and enhancing leisure and recreation could either protect environmental and historical assets or increase user pressure and thus risk to these assets. This is also the case for landscape.

- 5.3.4 Any additional employment, new infrastructure, the location of housing and the need to identify additional sites is likely to have impact on land in Harlow and potentially also the landscape and the historic environment. It would be important to consider prioritising the use of Previously Developed Land (PDL) and low-grade land for development in addition to re-design and refurbishment of existing property to minimise this impact. New development should also be sympathetic to the landscape of Harlow. This is currently not considered under the Housing theme strategic objectives and should be linked to relevant Placeshaping objectives.
- 5.3.5 The location of new housing and employment also has implications for transport and it is unclear at this stage whether there will be positive or negative compatibility with the transport sustainability topic. Transport considerations include: location in relation to strategic links, public transport, encouraging low car ownership etc. Transport can also play a role in Placeshaping and, again, the compatibility is unclear at this stage. Providing cultural, leisure and recreation opportunities should reduce the need to travel although, conversely, if poorly planned, it could result in creating more travel by residents to access these opportunities.
- 5.3.6 Opportunities protected and provided for under the Lifestyles theme should be available to all members of the Community to reduce inequalities.

## 6 Developing principles to direct growth

### 6.1 Introduction

- 6.1.1 This section of the Core Strategy asks for feedback on a number of issues affecting the location of new development in the District. The Council has stated that new development should maximise the Council's wider regeneration and sustainability goals underpinning the Core Strategy. The Council asks for feedback on what principles should direct growth ensuring that these overarching goals are achieved. However, no details are given on the specific criteria that will direct new development at this stage making the appraisal difficult. This is not uncommon for an Issues and Options Paper but the Council will need to provide more detail on these principles as the Core Strategy develops to allow the appraisal to take place.
- 6.1.2 The Core Strategy also states that it will consider and analyse a range of potential options for accommodating new development across the District, including:
1. looking at all opportunities within the 'urban area boundary';
  2. examining the role and function of other land such as underused land, open spaces and Green Wedges;
  3. considering what opportunities exist to increase density in certain parts of the town; and
  4. and the role of other initiatives including the redevelopment of Town Centre North.
- 6.1.3 The Core Strategy discusses these options in the context of the potential implications for Green belt releases around Harlow.
- 6.1.4 At this stage the Council is only presenting the various issues for the community to comment on and does not present any detailed options. As such it is not clear, at this stage, what the outcome will be on the wider strategy for Harlow. For example, it is not yet known to what extent higher densities will be supported and where. Neither is it clear what the outcome will be for using existing undeveloped land and underused open spaces; nor is it clear what role Green Wedges should have in the future development of Harlow.
- 6.1.5 Until more detail is known about the nature of the proposals it is difficult to appraise this part of the Core Strategy. This is not uncommon for an Issues and Options document. Given that there are many possible permutations appraising these at this stage is not possible. However, the Council will need to provide more detail on the nature of the proposals as they develop to ensure that the options can be adequately appraised and any significant effects identified.

## 7 What will be the situation with the plan (under Option A – RSS: Northern Led)?

### 7.1 Introduction

7.1.1 This Chapter appraises spatial option A (RSS: Northern Led) against the SA spatial areas and topics (the SA framework). This is one of the following spatial approaches as set out in the draft Core Strategy and Chapter 3 of this document:

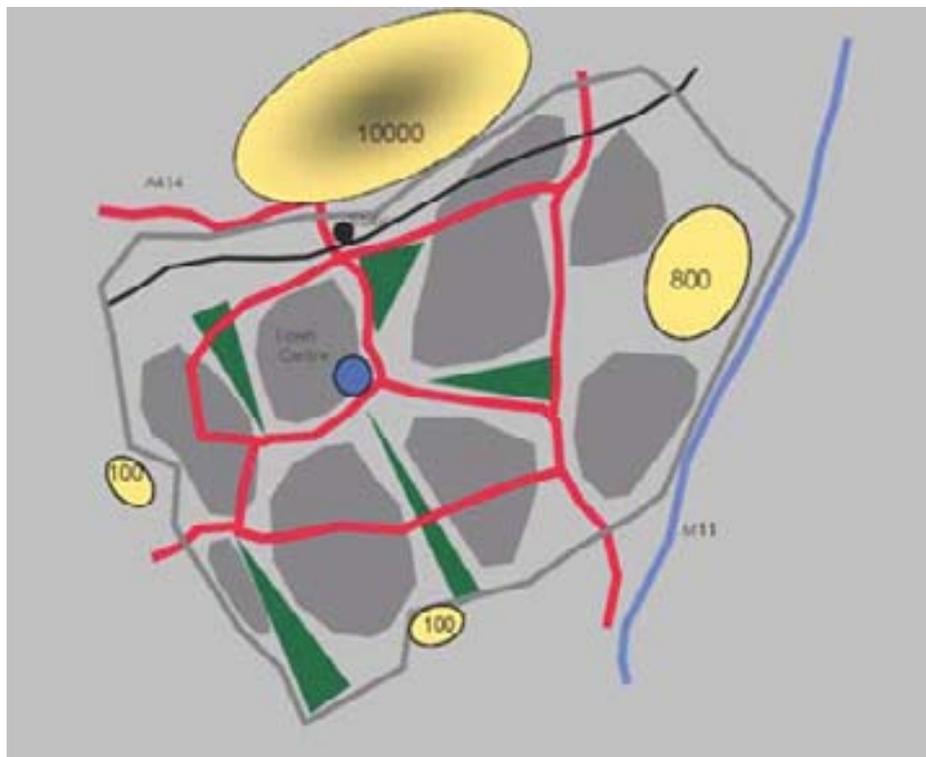
1. **Option A – RSS: Northern Led**
2. Option B – Policy led 2
3. Option C – Combined criteria led
4. Option D – Regeneration led
5. Option E – Sustainable transport led
6. Areas of search and potential housing distributions

7.1.2 The spatial option is illustrated in Figure 4 and is described in the box below, as taken from the Core Strategy Issues and Options document.

#### Option A – RSS: Northern Led

This approach is based on the clear directional and distributional elements of the housing growth requirements set out in policy HA1 of the now revoked East of England Plan and has regard to development potential against a range of social, economic and environmental criteria. This places the bulk of growth to the north of Harlow together with some growth to the east and smaller elements to the south and west. The larger distribution to the north with the smaller distributions in the other locations would avoid coalescence with Sawbridgeworth and other smaller settlements. The distributions have been informed by calculations of potential housing capacity by the consultants based on potential regeneration and transportation benefits as well as the environmental constraints of the broad locations considered.

Figure 4: Option A – RSS: Northern Led



## 7.2 Spatial areas

7.2.1 This section sets out the appraisal of the spatial option against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 9 summarises the significance of the expected impact.

Table 9: Appraisal of Option A against the SA framework spatial areas

Key				
Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)	Uncertain impact / insufficient information (?)	Negative impact (-)	
Option	Town Centre	Eastern growth area	Neighbourhoods	Industrial & employment areas
Option A – RSS Northern Led	+	-	?	?

### Town Centre

7.2.2 This spatial option would likely lead to significant positive effects on the Town Centre due to the increased mass and density of the town. It would be expected that in the medium term the increased population will support a greater amount and variety of services and facilities,

providing support for the town centre's regeneration and new employers would benefit from an increased labour pool.

- 7.2.3 Focusing much of the development to the north of Harlow should help to encourage development within Harlow Town North and this should help to unlock the potential of the train station and, in line with Policy HA1, develop the Stort Valley. It should also lead to improvements the Town Centre's appearance and visual and physical links between the north of the Town Centre and new development to the north.

### Eastern growth area

- 7.2.4 This option plans for the least additional dwellings of all the spatial options in the eastern growth area. The landscape in this area also has low sensitivity. Therefore this option should have a minimal negative impact on the landscape, environmental and historic assets and should minimise congestion on the strategic road network, loss of open space and Green Belt, and avoid development in a flood risk zone. However, as a consequence of placing the rest of the housing quantum in areas of higher landscape sensitivity, it should be noted that there may be a greater negative impact on Harlow's landscape overall.

### Neighbourhoods

- 7.2.5 The proposed growth option may impact the neighbourhoods of Old Harlow and Church Langley. Whether this is a positive or a negative impact will depend upon what is planned. Mark Hall and the Town Centre are the two neighbourhood centres closest to the north where the majority of new dwellings will be delivered and they are also in need of regeneration. These centres should benefit from improved bus services and transport in the north by road, cycle and rail, although there is a risk that residents may travel to the north rather than use facilities in the local centres. It will be important to regenerate local neighbourhoods and improve facilities and services to avoid this. Again, it will depend greatly upon delivery of housing and associated infrastructure; if poorly delivered, congestion could result on the strategic road network in this area.
- 7.2.6 It is also unclear whether the viability of the other neighbourhood centres will be negatively affected by lack of development and thus investment in the south and west of the district – different areas of the town are not functioning equally well and this could exacerbate issues in areas such as Staple Tye in the south west. The option does not explain where the additional 5,500 houses within Harlow will be delivered, but this could assist in regenerating the neighbourhoods and would require investment and improvement to ensure residents do not go elsewhere for newer facilities and services.

### Industrial and employment areas

- 7.2.7 This growth option will likely lead to significant positive effects for the town's existing industrial and employment areas due to its increased overall mass. It is anticipated that an enlarged population will support and attract a greater range of services and facilities as well as provide an expanded labour pool. However, to maximise these benefits it is essential that existing issues of congestion are reduced. Transport links (particularly to employment sites in the south) and facilities at existing industrial and employment areas may need to be improved in order to capitalise upon new development and an increased local employee catchment.

## 7.3 Topics

7.3.1 This section sets out the appraisal of the spatial option against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. The ‘community and wellbeing’ sub-section also incorporates equalities considerations. Table 10 summarises the significance of the expected impact.

**Table 10: Appraisal of Option A against the SA framework topics**

Key											
Positive impact (+)		Neutral impact / balance of positive and negative impacts (0)				Uncertain impact / insufficient information (?)			Negative impact (-)		
Option	Air	Biodiversity	Climate change	Community	Economy	Historic	Housing	Land	Landscape	Transport	Water
Option A – RSS Northern Led	-	?	?	?	?	-	?	?	-	-	-

### Air

7.3.2 Although no Air Quality Management Areas (AQMAs) have been declared in the proposed development areas for this option, traffic emissions (from the M11 and A414) are identified as the most significant source of air pollution in Harlow. By focusing the majority of development to the north of Harlow and less development in the east, this might ease congestion that would otherwise occur on the A414 and M11 if the majority of development were focused in the east. However, the high level of housing proposed to the north will likely lead to increased congestion across the district, particularly where the A414 passes through the north of Harlow into the northwest, likely leading to a deterioration of air quality. In addition, development proposed in the south and west is minimal, but it could reduce pressure on the problem roads on the north and east if it could be accompanied by feasible sustainable transport plans and strategic routes. Alternatively, this option may encourage use of the Harlow Town train station located in the north of Harlow.

### Biodiversity and green infrastructure

7.3.3 This option focuses develop to the north of Harlow and may impact upon County Wildlife Sites in the area, and the biodiversity value along the Stort Valley and the river. There is also a SSSI located north of Roydon which will be placed under pressure by development in the north, particularly given its location just south of the A414. Locating more development to the north of Harlow and less development within the eastern growth area should have a positive impact in terms of safeguarding Harlow’s designated open space, although its quality and onsite biodiversity should be enhanced where possible.

7.3.4 It is possible that green wedges, watercourses and other features in Harlow District play a role as wildlife corridors and other linkages and that these could be disrupted by new development. In particular, given the large scale of development to the north under this spatial option, there could be an impact on the River Stort and the green wedge extending from the town centre to the north.

## Climate change (mitigation and adaptation)

- 7.3.5 Increased levels of population and employment will most likely lead to an absolute increase in greenhouse gas emissions, particularly in the short to medium term. However, the large amount of development to the north of Harlow means that this spatial option presents the opportunity to create a sustainable urban extension and a sustainable community; exploring possibilities such as district heating schemes, energy from waste, large-scale sustainable design (e.g. from neighbourhoods, street and parking layouts to the design and construction of buildings) and sustainable transport patterns / modal shifts. The small amount of development in the east could be integrated with design for a sustainable community at Newhall. Transport and strategic routes (road, rail, cycle and foot) requirements would need to meet the scale of development and seek to minimise unsustainable forms of transport.
- 7.3.6 The area to the north of Harlow includes areas in Flood Risk Zone 3. It's important that new development avoids this area as well as avoids exacerbating flood risk elsewhere. The area of flood risk may also create a barrier between an urban extension to the north and the rest of Harlow. There should be a balance between integrating new development with the town, and avoiding development in an area of flood risk. There is also the potential for increased risk of surface water flooding as a result of new development. There could be an opportunity on the flood plain to create green infrastructure and wetland habitat, without creating a physical barrier in Harlow.
- 7.3.7 Climate change can impact on species dispersal and adaptation and new development could impact on buggering (e.g. maintaining wildlife corridors). This was also discussed under the biodiversity and green infrastructure topic.

## Community and wellbeing

- 7.3.8 Recent years has seen an increase in social exclusion and deprivation alongside urban decay in Harlow. Focusing a large amount of development to the north of Harlow should provide significant opportunities to redress this trend in the north of the district. In particular, offering a good range of employment and facilities and services in the north could address a trend of outmigration from Harlow and create a self sustaining urban extension. Otherwise reliance on existing community infrastructure such as schools, community centres and medical facilities in the north would risk coalescence with Sawbridgeworth and also dilute any sense of place and belonging in the new community, distancing it from Harlow in the public consciousness. There is the added concern that the Stort Valley, river and rail line may also act as a physical barrier between development in the north and the rest of Harlow. New, universally accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.
- 7.3.9 However, by only having minimal development to the south and west it might exacerbate problems within Harlow town and the south and west in particular. The least deprived areas are located towards the outskirts of town (adjacent to the growth options) and so it is not clear how the benefits of growth in terms of regeneration will be felt in deprived neighbourhoods within the town or whether this will exacerbate social exclusion. Given limited access to sustainable transport in these areas, reliance on existing infrastructure may result in people without cars being disadvantaged. Older people and people on lower incomes are very likely to be socially excluded in this scenario. Disabled people, older people as well as others requiring care services may be adversely affected by the development's poor connectivity to town or neighbourhood centres. The proposed development areas in the south and west of Harlow

contain two authorised Gypsy and Traveller sites. Unless these travelling communities are canvassed for engagement with the LDF process, and especially over new developments in close proximity to authorised pitches, these communities are likely to face social exclusion. The south and west areas include existing farming and agricultural activities. Balancing the natural attributes of the landscape with new housing, services and other urban opportunities, will be challenging.

- 7.3.10 Growth within the eastern growth area may not be substantial enough to create significant benefits and opportunities for local communities, and will depend upon detailed plans and delivery.
- 7.3.11 Given high obesity and diabetes figures for the district, any encouragement and provision for exercise and active recreation is likely to have a positive effect on human health. In this context, parks, woodlands and recreational areas included within development areas may play a part in alleviating health deprivation. Recreational activities are also likely to be beneficial to young people and may help to redress a high incidence of teenage pregnancy and low incidence of participating in physical activity.
- 7.3.12 Socio-economic profiles for the district's wards show homogeneity across the board with a predominant white population, with small pockets where other ethnic groups live, such as parts of Little Parndon, Hare Street and Mark Hall. This implies that the existing communities are defined along ethnic and other cultural lines, which may pose a challenge to social cohesion and to civic participation by new residents in any area.

### **Economy and employment**

- 7.3.13 The potential development to the north and (to a lesser extent) the east would be well located in terms of access to Templefields industrial estate, in addition to employment sites at Edinburgh Way (adjacent to Templefields), Burnt Mill, at the railway station and the Town Centre. The proximity to Harlow Town and Harlow Mill rail stations would also facilitate outward commuting towards key employment hubs such as London, Cambridge and Stansted Airport, capitalising on Harlow's strategic location within the region. It is unclear whether the growth within the eastern growth area will be economically viable e.g. in terms of generating employment opportunities.
- 7.3.14 New development in the north should increase the catchment for the Town Centre (in terms of residents in the north and visitors to Harlow via the road and rail network) and may result in a better offer of facilities and services. However, this would require appropriate investment in the Town Centre and planning the development in the north to avoid loss of customers and visitors from the Town Centre to the north. The Town Centre will need a sufficient range of retail, facilities and services and an improvement in its appearance and accessibility in order to compete with development in the north.

### **Historic environment**

- 7.3.15 The area identified for development in the north will include Schedule Ancient Monuments (SAMs) and listed buildings, and will be in close proximity to Conservation Areas (north of Harlow district) and registered parks and gardens (northeast and south of the A414 in the northwest). The overall scale of development is substantial and there is a strong likelihood that some of these historic elements could experience negative direct and indirect effects from development and increased visitor pressure.

- 7.3.16 There are also significant concentrations of listed buildings in the eastern growth area and SAMs nearer to Harlow Mill train station that may experience negative impacts from new development. In contrast, there are fewer historic assets to the south and west of Harlow where minimal development is planned.

## Housing

- 7.3.17 The level of potential growth should provide significant opportunities for high levels of affordable housing provision, particularly to the north of the district. The high rates of housing delivery could also help to reduce the cost of home ownership in the area thereby improving overall affordability, IMD for Housing and Barriers to Services and lowering the high levels of homelessness within the district. However, the spatial option probably will not alleviate high levels of housing deprivation and barrier to services within the south, west and east of the district.
- 7.3.18 The spatial option does not outline plans for gypsies and travellers pitches.

## Land

- 7.3.19 The majority of development in the north includes large areas designated as metropolitan Green Belt. Green Belt land is also designated in the west, east and south. Land of greater agricultural value to the east, south and west of Harlow may be negatively impacted. By creating a large urban extension to the north, it might make reuse, recycling and waste schemes more viable and easier to plan for, and could also increase the viability of energy from waste.

## Landscape

- 7.3.20 Focusing most of the development to the north of Harlow will place development opposite land designated as green wedge which could have implications for the integration of new development with Gibberd's landscape-led approach for Harlow. It could also hinder the extent to which green wedges penetrate into the wider countryside. Development to the north of Harlow could potentially lead to visual coalescence with Sawbridgeworth and is contained within an area of high landscape sensitivity to substantial urban developments. In addition, the Stort Valley acts as a barrier between the town and the landscape to the north, and developing the land in this area could have repercussions in terms of landscape, 'views' from the town, and acting as a physical barrier deterring integration with Harlow. However the ridgeline to the south of Harlow provides a significant constraint on the scale of development.
- 7.3.21 Two Special Landscape Areas (SLAs) – one to the northeast and one to the northwest – are at risk from indirect pressure from focusing much of the development to the north and a fair amount of development within the eastern growth area (although it is noted that there is less development in the eastern growth area than in the other spatial options).
- 7.3.22 As less development is proposed in the south and west, this should offer some protection over the high degree of landscape sensitivity in these areas to substantial urban developments. It should also minimise the risk of coalescence with Roydon. Development to the east will be in an area of low sensitivity to substantial urban development, however this spatial option places the least growth in this area and therefore increases likelihood of negatively impacting on landscape elsewhere.

## Transport

- 7.3.23 Focusing most of development in the north and to a lesser extent in the east, and keeping any development in the south and west to a minimum, locates development close to Harlow Town and Harlow Mill rail stations. Although this presents significant opportunities for increasing rail usage, there are also existing capacity constraints on this rail line. In addition, the high concentrations of large-scale development will also require increased public bus transport to and from these areas. However, this may be at the detriment to transport in the south and west.
- 7.3.24 Conversely, Junction 7 is the main access point to the M11, and it lies to the south of Harlow. A major consideration for future growth is the possibility of another connection to the M11 linking growth to the strategic road network. Low levels of development to the south and west of Harlow may miss out on improving access routes in these areas, improving poor levels of public transport and opportunities to capitalise upon the location of the London underground central line in Epping Forest. The impact being increased congestion on the strategic road network to the north and through the centre of Harlow in order to gain access to the M11.
- 7.3.25 Focusing development (and associated green infrastructure) in the north may increase opportunities for sustainable travel in this area and to a lesser extent to the east, but possibly to the general detriment of transport linkages and accessibility overall in the rest of Harlow. In addition, placing too much development in one area could result in increased congestion and may also require significant upgrades (for example, a new northern distributor road, motorway junction and link road and bridge across the Stort). These improvements would further promote unsustainable transport patterns and work against some Delivering a Sustainable Transport System (DaSTS) objectives and facilitating modal shift. However, development in the north offers the opportunity to integrate sustainable transport modes with employment sites and to enhance key public footpath and cycle path assets such as the Stort Valley Way and Three Forests Way.
- 7.3.26 The phasing of transport infrastructure will be critical in achieving modal shift over the long term and therefore must be fully put in place before residents move into the new growth areas.

## Water

- 7.3.27 Harlow is located in an area of severe water stress and has a daily domestic per capita consumption use which is significantly higher than the national average. Whilst there is identified capacity to provide water resources to meet planned growth to 2021, water resources in the area are either over-abstracted or over-licensed. Therefore, the high levels of growth under this option would place additional pressure on existing water resources and, under this spatial option, will focus much of this pressure in the north.
- 7.3.28 The large scale of development that is proposed in the north would, however, facilitate the implementation of high water efficiency standards and the incorporation of Sustainable Drainage Systems (SuDS) through the design of a sustainable urban extension. It would be important that development in the north takes into account and avoids any potential impact on the river Stort.
- 7.3.29 It should be noted that there are no significant differences between any of the spatial options in terms of their impacts against this topic.

## 7.4 How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?

7.4.1 From the appraisal of Option A the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

SA framework	Mitigation recommendations
Town Centre	<ul style="list-style-type: none"> <li>To avoid losing the increased customer catchment to the north, it would be important to ensure that the town centre has a substantial and attractive retail offer that can meet increased demand and that transport links to the Town Centre are adequate, particularly given the barrier created by the railway line.</li> </ul>
Eastern growth area	<ul style="list-style-type: none"> <li>There are opportunities for enhancements to accessibility, setting and biodiversity value for the local community and Harlow more widely.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>Continue to regenerate local neighbourhoods and improve facilities and services to avoid residents travelling to the north rather than use facilities in the local centres.</li> <li>Ensure that development does not impact upon the viability of neighbourhoods throughout the District.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>It is essential that existing issues of congestion are reduced and transport links are improved.</li> <li>Employment offer will need to be improved in order to capitalise upon development.</li> </ul>
Air	<ul style="list-style-type: none"> <li>Strong supporting policies for train travel and other forms of sustainable travel that limit car reliance.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Direct impacts on sites with potentially high biodiversity value (e.g. County Wildlife Sites, River Stort and Valley and SSSIs) should be avoided</li> <li>Enhance biodiversity e.g. by building green infrastructure into development in the north and by improving the habitat of the River Stort and Valley.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>Transport and strategic routes (road, rail, cycle and foot) requirements would need to meet the scale of development and seek to minimise unsustainable forms of transport</li> <li>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.</li> <li>There is an opportunity on the flood plain to create green infrastructure and wetland habitat, without creating a physical barrier in Harlow.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>Offering a good range of employment and facilities and services in the north could address a trend of outmigration from Harlow and create a self sustaining urban extension.</li> <li>New accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.</li> <li>Improve existing and provide new access to sustainable transport.</li> <li>Gypsy and Travellers need to be engaged in the LDF process, especially over new developments in close proximity to authorised pitches.</li> <li>The use of agricultural land for housing development should be avoided if possible.</li> <li>Levels of recreational provision should not be reduced by new</li> </ul>

SA framework	Mitigation recommendations
	<p>development and look to ways to enhance recreational activities.</p> <ul style="list-style-type: none"> <li>Invest in programmes of multicultural events to promote social cohesion between diverse and somewhat isolated communities and new population.</li> <li>Coalescence between development to the north of Harlow and existing settlements should be avoided where possible.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Growth to the north (and east) will need to include complementary (and not competing) employment opportunities so as not to detract from the regeneration of the town centre.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>Development which may lead to direct negative effects on the Registered Parks and Gardens in the area should be avoided.</li> <li>Policies requiring the protection of Conservation Areas, listed buildings and SAMs should be produced.</li> <li>Look at opportunities to enhance historic assets.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Plans for gypsies and travellers pitches will need to be considered.</li> </ul>
Land	<ul style="list-style-type: none"> <li>A Green Belt review should be undertaken prior to approval of development.</li> <li>Policies for renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible.</li> <li>An agricultural land survey could be undertaken to ensure that only the lowest quality land is brought forward for development.</li> <li>Opportunity to explore waste to energy initiatives to the north of Harlow.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Coalescence between north of Harlow and Sawbridgeworth and surrounding settlements should be avoided.</li> <li>Although there is likely to be less pressure on SLAs located to the south and west of the district, negative impacts may be cumulatively minimised by splitting the growth and thus pressure between the four areas.</li> <li>Safeguarding policies for green wedges and the River Stort are expected to be included in the Core Strategy.</li> <li>There is very little that can be suggested in terms of minimising the significant negative effects that are likely to occur from this development option on landscape character.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in, to ensure that good sustainable travel habits are formed.</li> <li>Development may require demand management measures and improvements to access routes to discourage additional congestion and minimise trip generation.</li> <li>Integrate sustainable transport modes to assist with access to development and employment sites.</li> </ul>
Water	<ul style="list-style-type: none"> <li>Strong policies are required to minimise water use and maximise water efficiency.</li> <li>The proposed development at Rye Meads Sewage Treatment Works (STW) will be an important additional consideration.</li> </ul>

## 8 What will be the situation with the plan (Option B – Policy led 2)?

### 8.1 Introduction

8.1.1 This Chapter appraises option B (Policy Led 2) against the SA spatial areas and topics (the SA framework). This is one of the following six spatial approaches as set out in the Core Strategy Issues and Options Paper and Chapter 3 of this document:

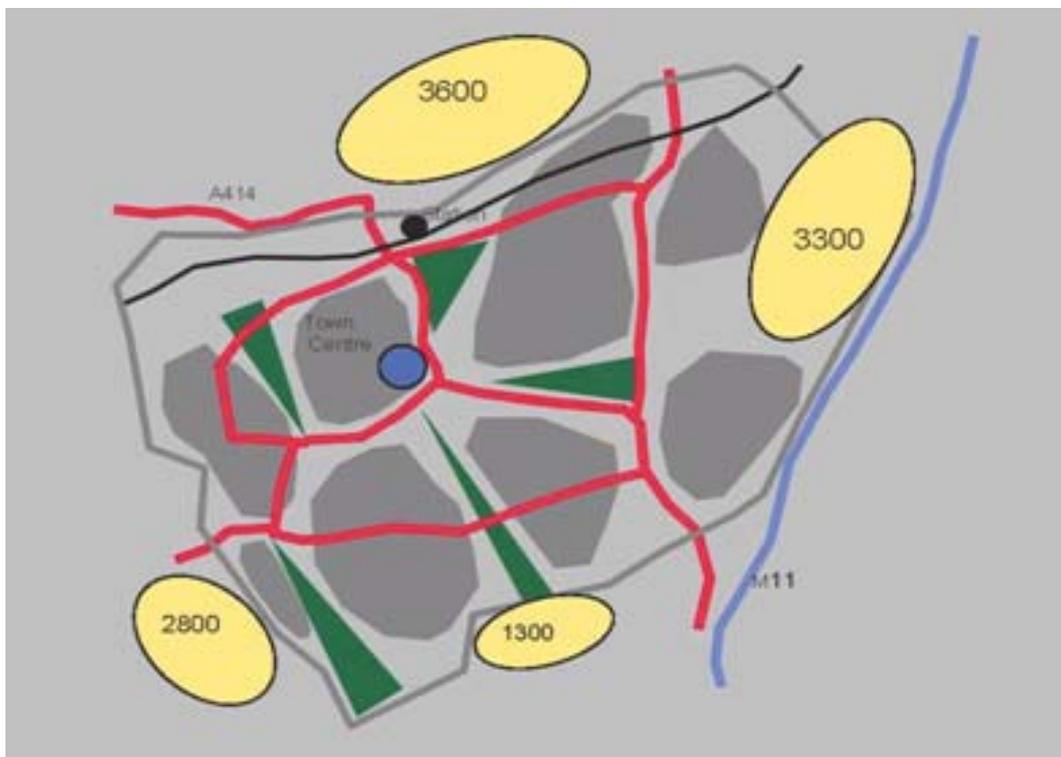
1. Option A – RSS: Northern Led
- 2. Option B – Policy led 2**
3. Option C – Combined criteria led
4. Option D – Regeneration led
5. Option E – Sustainable transport led
6. Areas of search and potential housing distributions

8.1.2 The spatial option is illustrated in Figure 5 and is described in the box below, as taken from the Core Strategy Issues and Options document.

#### Option B – Policy Led 2

This approach reflects the broad directional and distributional elements of the growth requirements set out in policy HA1 of the now revoked East of England Plan, as described above, but does not focus the bulk of the new housing provision to the north of Harlow. Instead it provides an opportunity to examine the relative opportunities and constraints associated with a number of potential alternative locations around Harlow but which still reflect the general overall approach set out in the guidance in the policy. This has been informed by the assessment of development potential of locations against a range regeneration, transportation and environmental constraints. A proportionate distribution between the locations to the north and south may help provide sufficient critical mass to assist the regeneration of the town. The smaller distributions to the south and west may assist regeneration initiatives in adjoining neighbourhoods to the south of Harlow. The scale of development in this location would ensure that the prominent ridgeline to the south of Harlow is not breached.

Figure 5: Option B – Policy Led 2



## 8.2 Spatial areas

8.2.1 This section sets out the appraisal of the spatial approach option against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 11 summarises the significance of the expected impact.

Table 11: Appraisal of Option B against the SA framework spatial areas

Key			
Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)	Uncertain impact / insufficient information (?)	Negative impact (-)

Option	Town Centre	Eastern growth area	Neighbourhoods	Industrial & employment areas
Option B - Policy Led 2	+	-	?	+

### Town Centre

8.2.2 This spatial option will likely lead to significant positive effects on the Town Centre due to the increased mass and density of the town. It would be expected that in the medium term the increased population will support a greater amount and variety of services and facilities, providing support for the town centre's regeneration and new employers would benefit from an increased labour pool.

8.2.3 Development to the north of Harlow should help to encourage development within Harlow Town North.

### Eastern growth area

8.2.4 The key impacts stemming from this growth option for the eastern growth area relate to transport, historic assets and the loss of open space. It is anticipated that growth could lead to increased traffic congestion, particularly on the A414. This may lead to indirect negative effects on the conservation areas and distinct settings of Churchgate Street and Old Harlow. Finally, high levels of growth to the east would probably result in a significant loss of open space.

### Neighbourhoods

8.2.5 The proposed growth option may impact the Conservation Areas in Churchgate Street and Old Harlow. Additional growth should support improved public bus services which will travel through some neighbourhoods and therefore improve connectivity and access. While a larger settlement will provide additional services and facilities it will be important that the additional growth does not place additional pressure on existing community infrastructure.

8.2.6 It is unclear whether the viability of some local services and facilities in the existing neighbourhoods will be negatively affected by the development of similar offers elsewhere in the new growth areas.

### Industrial and employment areas

8.2.7 This growth option will likely lead to significant positive effects for the town's existing industrial and employment areas due to its increased overall mass. It is anticipated that an enlarged population will support and attract a greater range of services and facilities as well as provide an expanded labour pool. However, to maximise these benefits it is essential that existing issues of congestion are reduced. Transport links to, and facilities at, existing industrial and employment areas may need to be improved in order to capitalise upon new development and an increased local employee catchment.

## 8.3 Topics

8.3.1 This section sets out the appraisal of the spatial approach option against the topics of the SA framework. The 'community and wellbeing' sub-section also incorporates equalities considerations. Table 12 summarises the significance of the expected impact.

**Table 12: Appraisal of Option B against the SA framework topics**

Option	Air	Biodiversity	Climate change	Community	Economy	Historic	Housing	Land	Landscape	Transport	Water
Option B - Policy Led 2	-	-	?	?	+	-	+	-	-	-	-

### Air

8.3.2 Although no AQMAs have been declared in the proposed development areas for this option, traffic emissions are identified as the most significant source of air pollution in Harlow. The main roads in the district are the M11 and the A414 and emissions of NO<sub>2</sub> and PM<sub>10</sub> from

vehicles on these roads represent the main air quality issues for the district. The high levels of development proposed under this option will likely lead to increased congestion across the district and this will likely lead to a deterioration of air quality.

### **Biodiversity and green infrastructure**

- 8.3.3 Although nationally designated sites are outside of the areas proposed for development the existence of two SSSIs and several CWS and ancient woodlands near to these areas may constitute a constraint on development. Development to the north is close to Roydon Mead SSSI and Rye Meads Special Protection Area (SPA) (see HRA for these impacts) which have been designated as UK BAP Priority Habitats and could be subject to negative impacts. Additionally, the impacts of development on the River Stort could lead to significant negative effects to the healthy population of otters.
- 8.3.4 The option would also lead to the loss of a significant amount of open space, particularly to the east of Harlow. However, this would present opportunities for improved access to open spaces as well. There may also be significant opportunities, particularly with respect to the development to the north of Harlow, to integrate green infrastructure into any proposed development schemes.
- 8.3.5 It is possible that green wedges, watercourses and other features in Harlow District – that could play a role as wildlife corridors and other linkages – may be disrupted by new development.

### **Climate change (mitigation and adaptation)**

- 8.3.6 Increased levels of population and employment will most likely lead to an absolute increase in greenhouse gas emissions, particularly in the short to medium term. However, the scale of development presents the opportunity to achieve a step change in the nature of development and could facilitate decreasing per capita emissions in the medium term and lower absolute emissions in the longer term. In addition, potential for renewable energy generation (e.g. waste-to-energy) and sustainable design and construction techniques and transport modal change are significant opportunities presented by this growth option.
- 8.3.7 In terms of flood risk, the majority of development is proposed for areas in Flood Risk Zone 1 so the risk of fluvial flooding is low. However, there are areas to the north and eastern parts of Harlow which are in Flood Risk Zone 3 and therefore any new development should avoid these areas. There is also the potential for increased risk of surface water flooding as a result of new development.
- 8.3.8 Climate change can impact on species dispersal and adaption and new development could impact on buffering (e.g. maintaining wildlife corridors). This was also discussed under the biodiversity and green infrastructure topic.

### **Community and wellbeing**

- 8.3.9 Recent years have seen an increase in social exclusion and deprivation alongside urban decay in Harlow. The scale of development should provide significant opportunities to redress this trend due to employment opportunities that are presented both in construction and the associated increased services and facilities required by a growing population. However, as the least deprived areas are located towards the outskirts of town (adjacent to the growth options) it is not clear how the benefits of growth in terms of regeneration will be felt in deprived

- neighbourhoods. Nevertheless, there are areas experiencing deprivation to the south of the town and these may benefit from appropriately phased growth in adjacent areas.
- 8.3.10 It is not clear whether there will be any significant effects on health inequalities within Harlow as a result of this option however, it can be assumed that reducing overall deprivation will lead to improved health conditions, particularly in the more deprived areas.
- 8.3.11 Socioeconomic profiles for the district's wards show homogeneity across the board with a predominant white population, with small pockets where other ethnicities live, such as parts of Little Parndon, Hare Street and Mark Hall. This implies that the existing communities are defined along ethnic and other cultural lines, which would pose a challenge to social cohesion and to civic participation by new residents in any area.
- 8.3.12 Potential growth, particularly to the south, west and east must strongly consider the potential positive contribution that could be made towards reducing high levels of crime. It is not clear whether this would be possible for this (or any) growth option, particularly in the short to medium term.
- 8.3.13 There may be some concerns raised over the recent net outward migration trend from Harlow and whether the large urban extension to the north may increase this. In the proposed northern development area, reliance on existing community infrastructure such as schools, community centres and medical facilities would risk coalescence with Sawbridgeworth and also dilute any sense of place and belonging in the new community, distancing it from Harlow in the public consciousness. Local community facilities should be provided to make the development area self sustaining. New, universally accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.
- 8.3.14 Community facilities in Churchgate Street and Old Harlow may suffice in the short term to sustain the new eastern development with additions and extensions, but would need overhauling at some point in the future due to the substantial new development being proposed. This suggests a programme of phasing-in community facilities. Growth in the southern and western development areas would also need to be supported by new community facilities, given the limited connectivity of these areas to the town centre by public transport. Primary schools, sports grounds and leisure facilities at Sumners and Kingsmoor are deemed inadequate to support new development.
- 8.3.15 Continued reliance on existing public transport infrastructure towards the south and west of Harlow may result in people without cars being disadvantaged. Older people and people with low incomes are very likely to be socially excluded in this scenario. Disabled people, older people as well as others requiring care services may be adversely affected by the development areas' poor connectivity to the town centre or other neighbourhood centres. The southern and western development areas would also be less connected to London, Cambridge, Stansted and the wider region than the northern and eastern areas, due to the absence of railway stations in their proximity. In addition, these areas include existing farming and agricultural activities. Balancing the natural attributes of the landscape with new housing, services and other urban opportunities, will be a challenge.
- 8.3.16 The proposed development area towards the south of Harlow contains an authorised Gypsy and Traveller site. Unless travelling communities are canvassed for engagement with the LDF process, and especially over new developments in close proximity to authorised pitches, these communities are likely to face social exclusion.

- 8.3.17 Given high obesity and diabetes figures for the district, any encouragement and provision for exercise and active recreation is likely to have a positive effect on human health. In this context, parks, woodlands and recreational areas included within development areas may play a part in alleviating health deprivation. Recreation activities are also likely to be beneficial to young people and could help to offset a high incidence of teenage pregnancy and low incidence of participating in physical activity. River Stort Navigation Way in the north and Harlow Woods, Mark Bushes, Latton Park and Harlow Park in the South, as well as Forest Way and Stort Valley way offer significant opportunities for recreational activities.

### **Economy and employment**

- 8.3.18 The potential development to the north and to the east would be well located in terms of access to Templefields industrial estate. The proximity to Harlow Town and Harlow Mill rail stations would also facilitate outward commuting towards key employment hubs such as London, Cambridge and Stansted Airport. The development to the south and west is located on predominantly agricultural land and therefore, it is important that any development will not have a negative effect on existing employment. However, the development to the west is in close proximity to the Pinnacles which would lead to nearby employment opportunities and an expanded local labour pool that could be drawn upon.
- 8.3.19 The higher levels of growth should support additional services and facilities in the longer term. In the short term the high levels of housing growth would support a high number of jobs in this area with associated positive impacts on local building suppliers.

### **Historic environment**

- 8.3.20 The areas identified for development under this option include SAMs, listed buildings, and Conservation Areas. The overall scale of development is substantial and there is a strong likelihood that some of these historic elements could experience negative direct and indirect effects from development.
- 8.3.21 There are significant concentrations of listed buildings in the northern and eastern growth areas and the potential for Conservation Areas in the north east of Harlow to experience negative indirect effects (e.g. through traffic) from new development.

### **Housing**

- 8.3.22 The level of potential growth should provide significant opportunities for high levels of affordable housing provision. The high rates of housing delivery could also help to reduce the cost of home ownership in the area thereby improving overall affordability, IMD for Housing and Barriers to Services and lowering the high levels of homelessness within the district.
- 8.3.23 The high rates of growth to the south and west of the region, where there is less access to public transport, could reduce access to services and facilities for those living in these areas that do not have access to a car.
- 8.3.24 The spatial option does not outline plans for gypsies and travellers pitches.

### **Land**

- 8.3.25 The majority of the proposed development area comprises primarily undeveloped Grade 2 agricultural land. The main land cover is arable farmland and grassland and some woodland

which will likely be negatively impacted under this option. This approach to development is in contrast to the emphasis towards prioritising development on Previously Development Land (PDL). Development may also include areas designed as metropolitan Green Belt.

- 8.3.26 Harlow has low rates of recycling and high rates of waste disposed at landfill. Positive impacts may be experienced due to opportunities to improve recycling rates and bring forward innovative processing technologies such as waste-to-energy, particularly as part of the creation of large new communities e.g. to the north and east.

### Landscape

- 8.3.27 While the areas identified for development lie outside Special Landscape Areas the proposed scale of development will lead to significant negative effects. This will be particularly to the north, west and south of Harlow where the Landscape Character has a high degree of sensitivity to substantial urban developments. The development to the east will be in an area which does not have a high degree of sensitivity to substantial urban development.
- 8.3.28 Development to the north of Harlow could potentially lead to visual coalescence with Sawbridgeworth. There is also potential for development to conflict with the 'green wedge' design of Harlow and the landscape-led approach of the Gibberd masterplan. Additionally, the ridgeline to the south of Harlow provides a significant constraint on the scale of development.

### Transport

- 8.3.29 The significant scale of development close to Harlow Town and Harlow Mill rail stations present opportunities for increasing rail usage, however there are also existing capacity constraints on this rail line. In addition, the high concentrations of large-scale development will also require increased public bus transport to and from these areas. Whilst development to the south and west is not in close proximity to rail stations, public bus services could provide access to these as well as the London underground train station in Epping; however existing concerns regarding public transport would need to be addressed to avoid worsening. The proximity of existing employment sites and opportunities for integrating green infrastructure within the design of new development will likely promote sustainable travel modes such as cycling and walking.
- 8.3.30 However, the high levels of development will also result in increased traffic across an already congested network and may require significant upgrades (for example, a new northern distributor road, motorway junction and link road and bridge across the Stort). These improvements would further promote unsustainable transport patterns and work against some DaSTS objectives and facilitating modal shift.
- 8.3.31 The phasing of transport infrastructure will be critical in achieving modal shift over the long term and therefore must be fully put in place before residents move into the new growth areas.

### Water

- 8.3.32 Harlow is located in an area of severe water stress and has a daily domestic per capita consumption use which is significantly higher than the national average. Whilst there is identified capacity to provide water resources to meet planned growth to 2021 water resources in the area are either over-abstracted or over-licensed. Therefore, the high levels of growth under this option would place additional pressure on existing water resources.

- 8.3.33 The large scale of development that is proposed in the north and east (and potentially also the south and west) should, however, facilitate the implementation of high water efficiency standards and the incorporation of SuDS. It would be important that development in the north takes into account and avoids and potential impact on the river Stort.
- 8.3.34 It should be noted that there is no significant differences between any of the spatial options in terms of their impacts against this topic.

## 8.4 How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?

- 8.4.1 From the appraisal of Option B the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

SA framework	Mitigation recommendations
Town Centre	<ul style="list-style-type: none"> <li>Seek co-benefits from development to the north of Harlow and within Harlow Town North.</li> </ul>
Eastern growth area	<ul style="list-style-type: none"> <li>Seek measures to avoid traffic congestion.</li> <li>Compensate for the significant loss of open space anticipated.</li> <li>Protect and complement the conservation areas and distinct settings of Churchgate Street and Old Harlow.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>Protect and complement the Conservation Areas and distinct settings of Churchgate Street and Old Harlow.</li> <li>Ensure that development does not impact upon the viability of neighbourhoods throughout the District and that existing community infrastructure can support growth</li> <li>Support the option with improved connectivity, access and public transport services.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>It is essential that existing congestion is reduced and transport links are improved.</li> <li>Employment offer will need to be improved in order to capitalise upon development.</li> </ul>
Air	<ul style="list-style-type: none"> <li>Strong supporting policies for train travel and other forms of sustainable travel that limit car reliance.</li> <li>Address congestion hotspots in the district.</li> <li>Appropriate controls must be put in place to ensure that air quality within the immediate area is not negatively affected during the construction of the new development and its associated infrastructure.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Direct impacts on sites with potentially high biodiversity value (e.g. County Wildlife Sites, River Stort and Valley and SSSIs) should be avoided</li> <li>Enhance biodiversity and open space e.g. by building green infrastructure into development in the north and by improving the habitat of the River Stort and Valley</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>Transport and strategic routes (road, rail, cycle and foot) requirements would need to meet the scale of development and seek to minimise unsustainable forms of transport</li> <li>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. Consider the use of SuDS in development.</li> </ul>

SA framework	Mitigation recommendations
	<ul style="list-style-type: none"> <li>• There is an opportunity on the flood plain to create green infrastructure and wetland habitat, without creating a physical barrier in Harlow.</li> <li>• Consider the potential for renewable energy generation and sustainable design and construction techniques</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>• Offering a good range of employment and facilities and services in the north could address a trend of outmigration from Harlow and create a self sustaining urban extension.</li> <li>• New accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.</li> <li>• Improve existing and provide new access to sustainable transport.</li> <li>• Reinforce links to southern and western development areas and increase connectivity between the different parts of Harlow and the proposed extensions.</li> <li>• Gypsy and Travellers need to be engaged in the LDF process, especially over new developments in close proximity to authorised pitches.</li> <li>• The use of agricultural land for housing development should be avoided if possible.</li> <li>• Further education, adult education and skills training programmes can be beneficial to help sections of the community currently living off the land, become better suited to the new employment and lifestyle opportunities that will be open to them in future.</li> <li>• Levels of recreational provision should not be reduced by new development and look to ways to enhance recreational activities.</li> <li>• Invest in programmes of multicultural events to promote social cohesion between diverse and somewhat isolated communities and new population.</li> <li>• Ensure that the benefits of growth will be felt in deprived neighbourhoods</li> <li>• Potential growth, particularly to the south, west and east must strongly consider the potential positive contribution that could be made towards reducing high levels of crime.</li> <li>• Community facilities in Churchgate Street and Old Harlow would need overhauling at some point in the future due to the substantial new development being proposed. This suggests a programme of phasing-in community facilities. Growth in the southern and western development areas would also need to be supported by new community facilities.</li> <li>• Coalescence between development to the north of Harlow and existing settlements should be avoided where possible.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Growth to the north (and east) will need to include complementary (and not competing) employment opportunities so as not to detract from the regeneration of the town centre.</li> <li>• Improve transport connections to and from employment sites including to Harlow Town and Harlow Mill rail stations.</li> <li>• Avoid loss of agricultural land and an impact on agricultural employment, particularly in the south and west</li> <li>• Capitalise on labour pool to the west for the Pinnacles and to the north and the east for Templefields and ensure adequate access and facilities at these location support increase in jobs at this location</li> <li>• Growth to the north and east will need to include complementary (and not competing) employment opportunities to the existing employment offer</li> <li>• Improve the skills and education of Harlow's residents.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Policies requiring the protection of Conservation Areas (particularly in the north east), listed buildings (particularly to the north and east) and SAMs should be produced.</li> <li>• Look at opportunities to enhance historic assets.</li> </ul>

SA framework	Mitigation recommendations
Housing	<ul style="list-style-type: none"> <li>Plans for gypsies and travellers pitches will need to be considered.</li> <li>Consider accessibility to services and facilities (e.g. through public transport or local provision) where public transport is poor and a smaller amount of development proposed (i.e. the south and west).</li> </ul>
Land	<ul style="list-style-type: none"> <li>A Green Belt review should be undertaken prior to approval of development.</li> <li>Policies for renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible.</li> <li>An agricultural land survey could be undertaken to ensure that only the lowest quality land is brought forward for development.</li> <li>Opportunity to explore waste to energy initiatives to the north of Harlow.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Coalescence between north of Harlow and Sawbridgeworth and surrounding settlements should be avoided.</li> <li>Although there is likely to be less pressure on SLAs located to the south and west of the district, negative impacts may be cumulatively minimised by splitting the growth and thus pressure between the four areas.</li> <li>Safeguarding policies for green wedges and the River Stort are expected to be included in the Core Strategy.</li> <li>There is very little that can be suggested in terms of minimising the significant negative effects that are likely to occur from this development option on landscape character.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in, to ensure that good sustainable travel habits are formed.</li> <li>Development may require demand management measures and improvements to access routes to discourage additional congestion and minimise trip generation.</li> <li>Integrate sustainable transport modes to assist with access to development and employment sites.</li> </ul>
Water	<ul style="list-style-type: none"> <li>Strong policies are required to minimise water use and maximise water efficiency.</li> <li>The proposed development at Rye Meads STW will be an important additional consideration.</li> </ul>

## 9 What will be the situation with the plan (under option C – Combined criteria led)?

### 9.1 Introduction

9.1.1 This Chapter appraises option c (combined criteria led) against the SA spatial areas and topics (the SA framework). This is one of the following six spatial approaches as set out in the draft Core Strategy and Chapter 3 of this document:

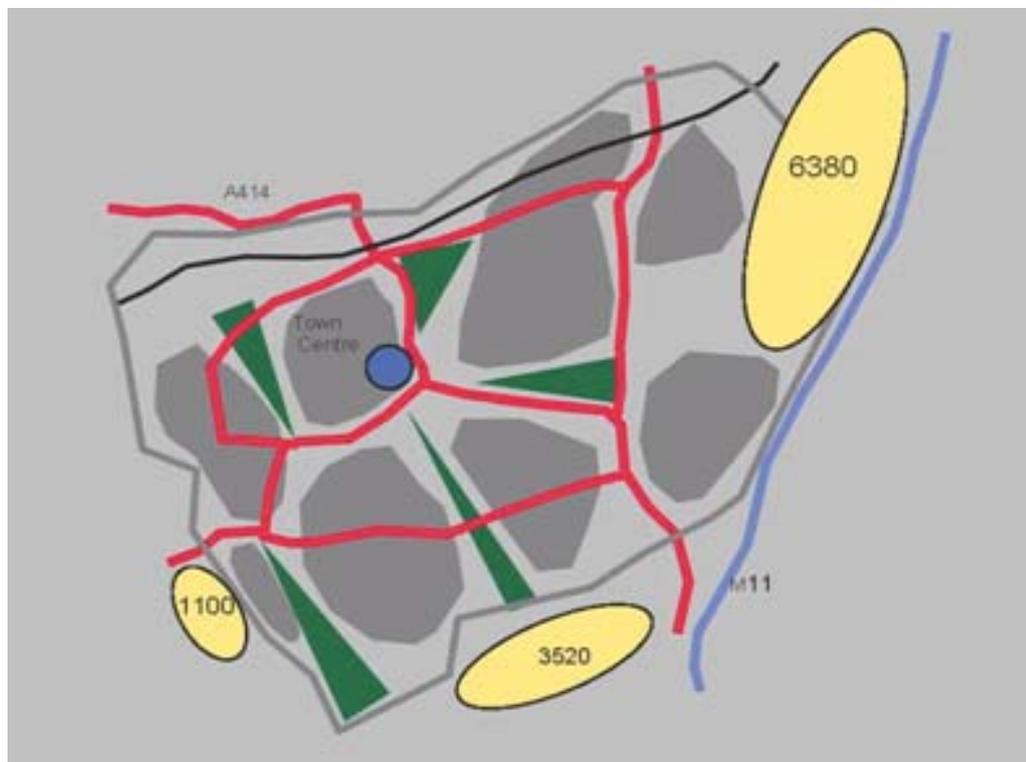
1. Option A – RSS: Northern Led
2. Option B – Policy led 2
3. **Option C – Combined criteria led**
4. Option D – Regeneration led
5. Option E – Sustainable transport led
6. Areas of search and potential housing distributions

9.1.2 The spatial option is illustrated in Figure 6 and is described in the box below, as taken from the Core Strategy Issues and Options document.

#### Option C – Combined criteria led

This approach is based on an assessment of a range of specific environmental criteria including Green Belt, landscape sensitivity, flood zones, regeneration objectives and transport accessibility but disregards the specific strategic directions for growth set out in the now revoked East of England Plan. This distribution focuses on locations to the east of Harlow as the main area of search with less development to the south and west. Providing new development adjacent to the town could bring additional critical mass that would reinforce existing facilities. However significant levels of growth without improvements to road infrastructure could have a negative impact and undermine regeneration initiatives. In addition growth to the south could impact on the ridgeline that provides a southern edge and setting for the town.

Figure 6: Option C - Combined criteria led



## 9.2 Spatial areas

9.2.1 This section sets out the appraisal of the spatial approach option against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 13 summarises the significance of the expected impact.

Table 13: Appraisal of Option C against the SA framework spatial areas

Key				
Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)	Uncertain impact / insufficient information (?)	Negative impact (-)	
Option	Town Centre	Eastern growth area	Neighbourhoods	Industrial & employment areas
Option C - Combined criteria led	?	-	?	?

### Town Centre

9.2.2 Of all the spatial options, the criteria led approach directs most development to the east and south of the town. The spatial option should lead to significant positive effects on the Town Centre due to the increased mass and density of the town. It would be expected that in the medium term the increased population will support a greater amount and variety of services

and facilities, providing support for the town centre's regeneration and new employers would benefit from an increased labour pool.

- 9.2.3 However, the Town Centre may miss out on a lack of development to the north of Harlow, particularly given the development of Harlow Town North that should improve linkages to the railway station and the north.

### Eastern growth area

- 9.2.4 This spatial option plans for the most development in the eastern growth area. In addition to Harlow urban area, this is the least sensitive landscape in the district and therefore should be able to absorb large-scale development. However, there are still some historic and environmental designations and assets in this location that may be negatively impacted upon by this option and there will be a substantial loss of Green Belt and open space. As indicated in the Issues and Options document a green belt review will be undertaken. In addition, the large scale of development may also make it harder to limit impact on the distinct settings of Church Langley and Old Harlow and the new community of Newhall. The scale of development proposed under this option may also result in negative impacts from an area of Flood Risk Zone 3 and poor transport infrastructure that may result in high levels of congestion and the potential isolation of residents.

### Neighbourhoods

- 9.2.5 This spatial option advocates the most development in the eastern growth area. It therefore has the potential to conflict with the setting of the distinct neighbourhoods of Old Harlow and Church Langley and the new community planned for Newhall.
- 9.2.6 Other neighbourhoods within Harlow should not experience significant negative effects, although it is important that facilities and services in the eastern growth area (and also to the south, depending upon the delivery of dwellings here) do not lead to the deterioration of, or place additional pressure on, existing community infrastructure in other neighbourhood centres. In addition, it is important that there is no loss of community well-being and sense of place in existing neighbourhoods and that connectivity between existing and new neighbourhoods is enhanced and not reduced.
- 9.2.7 Under this option, a fairly significant amount of dwellings are to be built to the south of Harlow and it is unclear whether this will be delivered in the form of a new community. Development to the south will likely impact on neighbourhood centres at Staple Tye and Bush Fair and other neighbourhood hatches closer to the southern fringe of the district. Alternatively, delivery of housing to this scale may give scope to consider the creation of a new neighbourhood centre or hatch. Similarly, there will likely be increased pressure on hatches and associated facilities and services on the southwest fringe within Great Parndon due to new dwellings on the district border.

### Industrial and employment areas

- 9.2.8 This growth option will likely lead to significant positive effects for the town's existing industrial and employment areas due to its increased overall mass. It is anticipated that an enlarged population will support and attract a greater range of services and facilities as well as provide an expanded labour pool. However, to maximise these benefits it is essential that existing issues of congestion are reduced. Transport links to, and facilities at, existing industrial and

employment areas may need to be improved in order to capitalise upon new development and an increased local employee catchment.

- 9.2.9 It is unclear whether the scale of development in the east will be supported by sufficient local employment opportunities and transport infrastructure and accessibility to employment sites may need to be addressed. There is potential for improved linkages between development to the west of Harlow and the Pinnacles site and between development to the south of Harlow with employment opportunities in the south (e.g. at locations in Bush Fair and Staple Tye) – however, it is unclear at this stage whether this will be delivered under this spatial option.

## 9.3 Topics

- 9.3.1 This section sets out the appraisal of the spatial approach option against the topics of the SA framework. The ‘community and wellbeing’ sub-section also incorporates equalities considerations. Table 14 summarises the significance of the expected impact.

**Table 14: Appraisal of option C against the SA framework topics**

Option	Air	Biodiversity	Climate change	Community	Economy	Historic	Housing	Land	Landscape	Transport	Water
Option C - Combined criteria led	-	-	?	?	?	-	?	-	-	?	-

### Air

- 9.3.2 Although no AQMAs have been declared in the proposed development areas for this option, traffic emissions (in particular from the M11 and A414) are identified as the most significant source of air pollution in Harlow. The delivery of high levels of additional housing will likely lead to increased congestion across the district and will likely lead to a deterioration of air quality. In particular, the location of the M11 and A414 in relation to the eastern growth area may result in large problems in terms of congestion and additional traffic pressure, given the large amount of housing in this area under this spatial option. Locating no development to the north will increase pressure on the east and may result in the opportunities of Harlow town station being missed, although the potential to use Harlow Mill station could be explored. Transport links in the south and west will also experience increased congestion.

### Biodiversity and green infrastructure

- 9.3.3 Although nationally designated sites are outside of the areas proposed for development, the eastern growth area includes County Wildlife Sites and protected wildlife verges and a large amount of open space in this area, some of which is of high natural status and will have both biodiversity and recreational value. Given the large quantum of housing to be delivered at this location – the most under any of the spatial options – it will be difficult to avoid negative impacts on these sites.
- 9.3.4 Land on the southern fringe of Harlow is also of high natural status and could be impacted by a large number of dwellings planned for this location, although there is also an opportunity to protect and enhance open space and biodiversity as a part of new development. A SSSI is located within the south western edge of Harlow district, and development to the south and west could have a negative impact upon this.

- 9.3.5 Not developing in the north should protect environmental assets in this area including a SSSI, County Wildlife Sites and the River Stort, although the opportunity to protect and enhance the River Stort and to enhance and invest in these areas for open space value may be missed.
- 9.3.6 It is possible that green wedges, watercourses and other features in Harlow District – that could play a role as wildlife corridors and other linkages – may be disrupted by new development, particularly to the east under this option.

### Climate change (mitigation and adaptation)

- 9.3.7 Increased levels of population and employment will most likely lead to an absolute increase in greenhouse gas emissions, particularly in the short to medium term. However, the scale of development presents the opportunity to achieve in step change in the nature of development and could facilitate decreasing per capita emissions in the medium term and lower absolute emissions in the longer term. The opportunity to create both a sustainable urban extension and a sustainable community in the eastern growth area includes possibilities such as district heating schemes, energy from waste, large-scale sustainable design (e.g. from neighbourhoods, street and parking layouts to the design and construction of buildings) and sustainable transport patterns / modal shifts. This could link in with plans for a sustainable community at Newhall. Transport and strategic routes (road, rail, cycle and foot) requirements are a particular challenge in east Harlow and would need to meet the scale of development and seek to minimise unsustainable forms of transport. Development proposed to the south of Harlow is of a significant size that may allow for a new sustainable community and will require a suitable sustainable transport offer. Development to the west is of a smaller scale but could incorporate sustainable construction and design principles.
- 9.3.8 In terms of flood risk, development is proposed for areas in Flood Risk Zone 1 so the risk of fluvial flooding is low. However, there is an area of Flood Risk Zone 3 in the eastern growth area and, given the large amount of dwellings proposed for this area, it may be difficult to avoid the risk of flooding to development. There is also the potential for increased risk of surface water flooding as a result of new development.
- 9.3.9 Climate change can impact on species dispersal and adaptation and new development could impact on buffering (e.g. maintaining wildlife corridors). This was also discussed under the biodiversity and green infrastructure topic.

### Community and wellbeing

- 9.3.10 Recent years has seen an increase in social exclusion and deprivation alongside urban decay in Harlow. The scale of development should provide significant opportunities to redress this trend due to employment opportunities that are presented both in construction and the associated increased services and facilities required by a growing population. However, as the least deprived areas are located towards the outskirts of town (adjacent to the growth options) it is not clear how the benefits of growth in terms of regeneration will be felt in deprived neighbourhoods. Nevertheless, there are areas experiencing deprivation to the south of the town and these may benefit from appropriately phased growth in adjacent areas.
- 9.3.11 Not placing any development in the north, however, may reduce the level of investment and amount of facilities and services available, thus disadvantaging the communities in this area and creating inequalities.

- 9.3.12 Potential growth, particularly to the south, west and east must strongly consider the potential positive contribution that could be made towards reducing high levels of crime. It is not clear whether this would be possible for this (or any) growth option, particularly in the short to medium term.
- 9.3.13 The eastern development area currently had limited public transport links into the town centre and other Harlow neighbourhood centres, but would have good links to the wider region, Stansted, Cambridge and London via the M11 and the two railways stations nearby. This may promote a car-reliant out-commuting culture. Older people and people with low incomes are very likely to be socially excluded in this scenario. Disabled people, older people as well as others requiring care services may be adversely affected by the development areas' poor connectivity to the town centre or other neighbourhood centres. Community facilities exist in Churchgate Street and Old Harlow, but are deemed inadequate to serve 6380 potential new homes. In this spatial option, the eastern development area will require new community facilities such as shopping, schools and care and medical facilities. Growth in the Southern and Western development areas would also need to be supported by new community facilities, given the limited connectivity of these areas to the town centre by public transport. Primary schools, sports grounds and leisure facilities at Sumners and Kingsmoor are deemed inadequate to support new development.
- 9.3.14 The southern and western development areas will also be less connected to London, Cambridge, Stansted and the wider region than the eastern area, due to the absence of railway stations in their proximity. The proposed development area towards the south of Harlow contains an authorised Gypsy and Traveller site. Unless travelling communities are canvassed for engagement with the LDF process, and especially over new developments in close proximity to authorised pitches, these communities are likely to face social exclusion. The southern and western proposed development areas also include existing farming and agricultural activities. Balancing the natural attributes of the landscape with new housing, services and other urban opportunities, will be a challenge
- 9.3.15 Given high obesity and diabetes figures for the district, any encouragement and provision for exercise and active recreation is likely to have a positive effect on human health. In this context, parks, woodlands and recreational areas included within development areas may play a part in alleviating health deprivation. Recreation activities are also likely to be beneficial to young people and may help to redress a high incidence of teenage pregnancy and low incidence of participating in physical activity. Harlow Woods, Mark Bushes, Latton Park and Harlow Park in the South, as well as Forest Way and Stort Valley way offer significant opportunities for recreational activities.
- 9.3.16 Socioeconomic profiles for the district's wards show homogeneity across the board with a predominant white population, with small pockets where other ethnicities live, such as parts of Little Parndon, Hare Street and Mark Hall. This implies that the existing communities are defined along ethnic and other cultural lines, which would pose a challenge to social cohesion and to civic participation by new residents in any area.

### **Economy and employment**

- 9.3.17 As a whole the high level of growth should enhance Harlow's role as a regional centre and improve the town's overall economic situation. The growth option will likely lead to positive effects for the town's economy and employment and it is anticipated that an enlarged population will support and attract a greater range of services and facilities as well as provide

an expanded labour pool. The higher levels of growth should support additional services and facilities in the longer term. In the short term the high levels of housing growth would support a high number of jobs in this area with associated positive impacts on local building suppliers.

- 9.3.18 The large amount of development proposed for the east of Harlow may require the provision of employment or/and the issue of congestion and poor transport infrastructure to be addressed in order for residents to access other employment areas. There should be an increased labour pool for nearby employment areas, including Church Langley, Newhall, Gilden Way and land north of Nortel Employment Area. The proximity to Harlow Mill rail station could also facilitate outward commuting towards key employment hubs such as London, Cambridge and Stansted Airport, capitalising on Harlow's strategic location within the region.
- 9.3.19 The development to the south and west is located on predominantly agricultural land and therefore it is important that any development will not have a negative effect on existing employment. However, the development to the west is in close proximity to the Pinnacles employment area, offering an expanded local labour pool that could be drawn upon.
- 9.3.20 However, development proposed in the west and south (as with the east) would require transport infrastructure and linkages to employment areas to be improved. In addition it is unclear if the economy and retail offer of Harlow Town Centre will be negatively affected by a lack of new development to the north and thus a local catchment in close proximity to this area. It will still require investment to improve its accessibility and appearance. Growth to the east will need to include complementary (and not competing) employment opportunities so as not to detract from the regeneration of the town centre.
- 9.3.21 Particular deprivation in skills, education and training exists in the northwest and south of the district whereas the eastern growth area is comparatively less deprived. This option may therefore exacerbate this situation.

### Historic environment

- 9.3.22 The areas identified for development under this option include SAMs, listed buildings, and Conservation Areas. The overall scale of development is substantial and there is a strong likelihood that some of these historic elements could experience negative direct and indirect effects (e.g. traffic) from development and increased visitor pressure. In particular, the eastern growth area includes a number of listed buildings, Conservation Areas, registered parks and gardens and SAMs. Given that this spatial option places the most development in this area, it is likely that there will be a negative impact on these features. A considerable amount of development is located to the south of Harlow under this option, and this could impact upon two SAMs located within this area.

### Housing

- 9.3.23 The level of potential growth should provide significant opportunities for high levels of affordable housing provision. The high rates of housing delivery could also help to reduce the cost of home ownership in the area thereby improving overall affordability, improving the IMD for Housing and Barriers to Services and lowering the high levels of homelessness within the district.
- 9.3.24 In particular, locating housing in the east should address an area of housing deprivation and barrier to services. The west of the district has areas of housing deprivation that the proposed

small amount of housing will address to some extent, although a lack of development to the north may result in continued deprivation in the northwest.

- 9.3.25 The spatial option does not outline plans for gypsies and travellers pitches.

## Land

- 9.3.26 The majority of development in the east includes large areas designated as metropolitan Green Belt and green wedge. Green Belt land is also designated in the west, north and south, and a Green Belt review is called for in the East of England plan to accommodate growth. Land of greater agricultural value to the east, south and west may be negatively impacted by development under this option. However, no development is proposed to the north of Harlow where the land is generally of lower agricultural value. A policy of renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible (and without impacting upon environmental and historical assets).
- 9.3.27 Harlow has low rates of recycling but high rates of waste disposed at landfill. Positive impacts may be experienced due to opportunities to improve recycling rates and bring forward innovative processing technologies such as waste-to-energy, particularly as part of the creation of large new communities e.g. to the south and east.

## Landscape

- 9.3.28 Given the large amount of development proposed to the east and also to the south, it is possible that there will be a negative (perhaps indirect) impact on Special Landscape Areas to the northeast and southwest fringes of Harlow. However, no development is proposed to the north where landscape has a particularly high degree of sensitivity, and this should also avoid coalescence with Sawbridgeworth. Similarly, coalescence with Roydon should be avoided by locating only a small quantum of development in the southwest. In addition, the area to the east of Harlow does not have a high degree of sensitivity to substantial urban development and therefore may be able to absorb the significant scale of development proposed.
- 9.3.29 There is also potential for development to conflict with the 'green wedge' design of Harlow and the landscape-led approach of the Gibberd masterplan. Additionally, the ridgeline to the south of Harlow provides a significant constraint on the scale of development and provides a southern edge and setting for the town that could be affected given the large proportion of dwellings proposed for this location in comparison to the other spatial options.

## Transport

- 9.3.30 The high levels of development close to Harlow Mill rail stations present a significant opportunity for increasing rail usage, however there are also existing capacity constraints on this rail line, and not placing any development in the north may result in lost potential for utilising the location of Harlow Town station. Not developing in the north could miss out on opportunities to link in to existing and proposed road infrastructure and Harlow Town station, and also on opportunities provided by key public footpaths and cycle paths.
- 9.3.31 The high concentration of large-scale development will also require increased public bus transport to and from the east and also to the south and west (where public transport is currently poor). Conversely, without these improvements and significant investment the district (in particular towards the east) is likely to suffer from immobility and high levels of congestion.

These improvements would further promote unsustainable transport patterns and work against some DaSTS objectives and facilitating modal shift.

- 9.3.32 Whilst development to the south and west is not in close proximity to rail stations, public bus services could provide access to these as well as the London underground station in Epping. The proximity of existing employment sites and opportunities for integrating green infrastructure within the design of new development will likely promote sustainable travel modes such as cycling and walking.
- 9.3.33 The phasing of transport infrastructure will also be critical in achieving modal shift over the long term and therefore must be fully put in place before residents move into the new growth areas.

## Water

- 9.3.34 Harlow is located in an area of severe water stress and has a daily domestic per capita consumption use which is significantly higher than the national average. Whilst there is identified capacity to provide water resources to meet planned growth to 2021 water resources in the area are either over-abstracted or over-licensed. Therefore, the high levels of growth under this option would place additional pressure on existing water resources.
- 9.3.35 The large scale of development that is proposed would, however, facilitate the implementation of high water efficiency standards and the incorporation of SuDS, particularly in the eastern growth area.
- 9.3.36 It should be noted that there are no significant differences between any of the spatial options in terms of their impacts against this topic.

## 9.4 How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?

- 9.4.1 From the appraisal of the Combined criteria led option the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

SA framework	Mitigation recommendations
Town Centre	<ul style="list-style-type: none"> <li>Services and facilities offer in Town Centre will need to meet the demand from the increased mass and density of the town.</li> </ul>
Eastern growth area	<ul style="list-style-type: none"> <li>There are opportunities for enhancements to accessibility, setting and biodiversity value for the local community and Harlow more widely.</li> <li>Integrate green infrastructure and open space in to development design and avoid impacts on historic and environmental designations.</li> <li>Preserve the distinct settings of Church Langley, Old Harlow and the new community of Newhall and explore ways to connect and enhance these neighbourhoods.</li> <li>Enhance transport infrastructure and sustainable travel options.</li> <li>Avoid development in areas of Flood Risk Zone 3 and integrate SuDS and other flood mitigation strategies in to design.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>Continue to regenerate local neighbourhoods and improve facilities and services to avoid residents travelling to use facilities in other local centres.</li> </ul>

SA framework	Mitigation recommendations
	<ul style="list-style-type: none"> <li>• Ensure that development does not impact upon the viability of neighbourhoods throughout the District. Invest in existing neighbourhood centres and hatches to support regeneration, infrastructure and to foster a sense of community.</li> <li>• Preserve the distinct settings of Church Langley, Old Harlow and the new community of Newhall and explore ways to connect and enhance these neighbourhoods.</li> <li>• Improve public bus services, connectivity and access between existing and new neighbourhoods.</li> <li>• There may be a requirement to create a new neighbourhood centre(s) or hatch(es) and establish linkages and synchronicity with existing centres and hatches.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>• Employment offer, services and facilities will need to be improved in order to capitalise upon development and increased overall town mass.</li> <li>• It is essential that existing issues of congestion are reduced and transport links are improved, particularly in the eastern growth fringe and to the south.</li> </ul>
Air	<ul style="list-style-type: none"> <li>• Strong supporting policies for sustainable travel that limit car reliance – consider the strategic position and potential of Harlow Mill station.</li> <li>• Upgrading Harlow’s transport infrastructure and address problems of congestion, particularly in the eastern growth area and the south and west.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>• Direct impacts on sites with potentially high biodiversity and open space value (e.g. County Wildlife Sites, protected wildlife verges and SSSIs) should be avoided.</li> <li>• Enhance biodiversity and open space opportunities e.g. by building green infrastructure into development in the eastern growth area and to the south.</li> <li>• The opportunity to protect and enhance the River Stort and to enhance and invest in these areas for open space value should not be missed.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>• Transport and strategic routes (road, rail, cycle and foot) requirements would need to meet the scale of development and seek to minimise unsustainable forms of transport</li> <li>• 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. Integrate flood mitigation measures in to development.</li> <li>• There is an opportunity to create both a sustainable urban extension and a sustainable community in the eastern growth area (and to a lesser extent in the south of Harlow) and to promote sustainable construction and design, including possibilities such as district heating schemes, energy from waste, large-scale sustainable design (e.g. from neighbourhoods, street and parking layouts to the design and construction of buildings) and sustainable transport patterns / modal shifts. This could link in with plans for a sustainable community at Newhall.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>• New accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.</li> <li>• Gypsy and Travellers need to be engaged in the LDF process, especially over new developments in close proximity to authorised pitches.</li> <li>• The use of agricultural land for housing development should be avoided if possible. Engage with the agricultural community and consider further education, adult education and skills training programmes to help sections of the community currently living off the land become better suited to the new employment and lifestyle opportunities that will be open</li> </ul>

SA framework	Mitigation recommendations
	<p>to them in future.</p> <ul style="list-style-type: none"> <li>Levels of recreational provision should not be reduced by new development and look to ways to enhance recreational activities.</li> <li>Invest in programmes of multicultural events to promote social cohesion between diverse and somewhat isolated communities and new population.</li> <li>The eastern development area in this spatial option must include community facilities, to avoid overtaxing existing facilities in Old Harlow and Churchgate Street.</li> <li>The eastern development area would benefit from better public transport links into the town centre and other neighbourhood centre. Existing public transport links to southern and western development should be reinforced e.g. more buses plying the same routes, more bus stops and diversions to existing routes to service new developments. Increase connectivity between the different parts of Harlow and the proposed extensions.</li> <li>Maintain, extend and enhance walking and cycling networks.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Improve transport connections to and from employment sites, particularly in the east but also to the west and south.</li> <li>Look at the potential benefits of Harlow Mill rail station.</li> <li>Avoid loss of agricultural land and an impact on agricultural employment, particularly in the south and west</li> <li>Capitalise on labour pool to the west for the Pinnacles and to the east for Church Langley, Newhall, Gilden Way and land north of Nortel Employment Area. Ensure adequate access and facilities at these locations.</li> <li>Growth will need to include complementary (and not competing) employment opportunities to the existing employment offer</li> <li>Improve the skills and education of Harlow's residents.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>Development which may lead to direct negative effects on SAMs, listed buildings, registered parks and gardens and Conservation Areas should be avoided, particularly in the east.</li> <li>Policies requiring the protection of Conservation Areas, listed buildings and SAMs should be produced.</li> <li>Look at opportunities to enhance historic assets.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Plans for gypsies and travellers pitches will need to be considered.</li> </ul>
Land	<ul style="list-style-type: none"> <li>A Green Belt review should be undertaken prior to approval of development.</li> <li>Policies for renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible.</li> <li>An agricultural land survey could be undertaken to ensure that only the lowest quality land is brought forward for development.</li> <li>Opportunity to explore waste to energy initiatives and other reuse, recycling and waste schemes to the east and to the south of Harlow.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Although there is likely to be less pressure on SLAs located to the south and west of the district, negative impacts may be cumulatively minimised by splitting the growth and thus pressure between the four areas.</li> <li>Safeguarding policies for green wedges and the River Stort are expected to be included in the Core Strategy.</li> <li>There is very little that can be suggested in terms of minimising the significant negative effects that are likely to occur from this development option on landscape character.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Improvements to public transport systems including rail station upgrades</li> </ul>

SA framework	Mitigation recommendations
	<p>and the provision of new bus services should be put in place prior to residents moving in, to ensure that good sustainable travel habits are formed.</p> <ul style="list-style-type: none"><li>• Development may require demand management measures and improvements to access routes to discourage additional congestion and minimise trip generation.</li><li>• Integrate sustainable transport modes to assist with access to development and employment sites.</li><li>• Enhancements to cycle paths, foot paths and other transport links to the north could be encouraged through other policies.</li></ul>
Water	<ul style="list-style-type: none"><li>• Strong policies are required to minimise water use and maximise water efficiency.</li><li>• The proposed development at Rye Meads STW will be an important additional consideration.</li></ul>

## 10 What will be the situation with the plan (under Option D - Regeneration led)?

### 10.1 Introduction

10.1.1 This Chapter appraises option D (regeneration led) against the SA spatial areas and topics (the SA framework). This is one of the following six spatial approaches as set out in the Core Strategy Issues and Options Paper and Chapter 3 of this document:

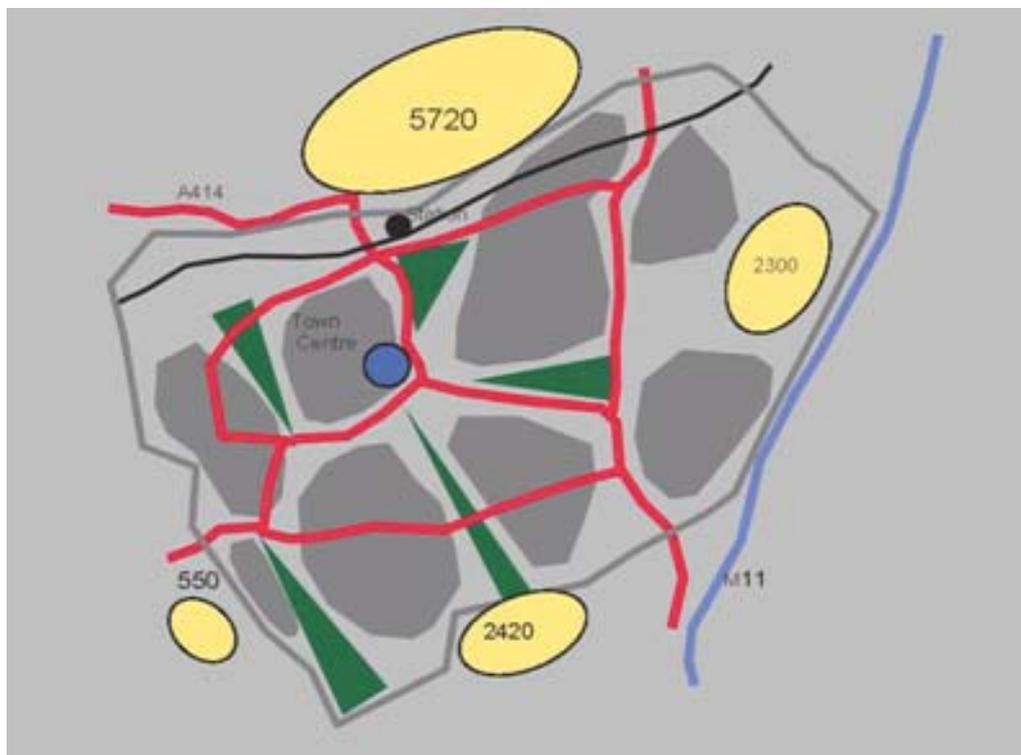
1. Option A – RSS: Northern led
2. Option B – Policy led 2
3. Option C – Combined criteria led
4. **Option D – Regeneration led**
5. Option E – Sustainable transport led
6. Areas of search and potential housing distributions

10.1.2 The spatial option is illustrated in Figure 7 and is described in the box below, as taken from the Core Strategy Issues and Options document.

#### Option D - Regeneration led

An alternative approach examined the identification of areas of search and distribution of new housing based upon securing the greatest potential regeneration benefits for locations within Harlow. This again focused on growth to the north of Harlow with smaller areas but with similar distributions to the east and south with a small amount to the west. This approach could provide sufficient critical mass to promote urban renaissance in the town and to help facilitate the delivery of key infrastructure. It may also assist support regeneration initiatives in adjoining neighbourhoods to the south of the town. Although the larger distributions to the north may assist investment in new road and public transport there may not be sufficient capacity to accommodate the options to the south and could impact on the ridgeline that provides a southern edge and setting for the town.

Figure 7: Option D - Regeneration led



## 10.2 Spatial areas

10.2.1 This section sets out the appraisal of the spatial approach option against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 15 summarises the significance of the expected impact.

Table 15: Appraisal of option D against the SA framework spatial areas

Key			
Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)	Uncertain impact / insufficient information (?)	Negative impact (-)

Option	Town Centre	Eastern growth area	Neighbourhoods	Industrial & employment areas
Option D - Regeneration led	+	-	?	+

### Town Centre

10.2.2 The spatial option will likely lead to positive significant effects on the Town Centre due to the increased mass and density of the town. It would be expected that in the medium term the increased population will support a greater amount and variety of services and facilities, providing support for the town centre's regeneration and new employers would benefit from an increased labour pool.

- 10.2.3 Of the proposed options, the Regeneration led approach has the second largest number of dwellings located to the north of Harlow. As per Policy led approach A, this should help to both encourage development within Harlow Town North and unlock the potential of the train station and, in line with Policy HA1, develop the Stort Valley. It should also improve the Town Centre's appearance and visual and physical links between the north of the Town Centre and new development to the north.
- 10.2.4 By also spreading development to the east, south and west of Harlow this option should reinforce the role of the town centre by spreading the catchment of residents across the district.

### Eastern growth area

- 10.2.5 Of all the spatial options, the regeneration led approach has the second least number of dwellings located in the east of Harlow. The landscape in this area also has low sensitivity. Therefore this option should have a minimal negative impact on the landscape, environmental and historic assets and should minimise congestion on the strategic road network, loss of open space and Green Belt, and avoid development in a flood risk zone. (However, as a consequence of placing the rest of the housing quantum in areas of higher landscape sensitivity, it should be noted that there may be a greater negative impact on Harlow's landscape overall).
- 10.2.6 Although this policy should protect the conservation areas and distinct settings of Churchgate Street and Old Harlow, it might also miss out on opportunities to develop this area, particularly given the new development at Newhall. It is unclear whether the smaller scale of development will be of a sufficient size to support the creation of a sustainable community and associated infrastructure and employment opportunities.
- 10.2.7 It is anticipated that growth will lead to increased traffic congestion, particularly on the A414. This may lead to indirect negative effects on the conservation areas and Churchgate Street and Old Harlow. However, the smaller scale of development might make this more manageable and, combined with development to the north, there may be adequate investment in road infrastructure to address this issue.

### Neighbourhoods

- 10.2.8 By spreading the growth to the north, west, south and (within the) east, this spatial option should have significant positive effects in terms of neighbourhoods and should avoid the occurrence of coalescence, particularly in the east. Investment should not be focused overtly in one area of the district and therefore should not compete with community infrastructure in existing neighbourhood centres. Assuming the option encourages investment to be spread across the district, existing neighbourhood centres may be able to capitalise on new residents and provide improved facilities for existing and new residents. This spatial option overall should facilitate the delivery of key infrastructure including transport infrastructure, thus improving connectivity across the district, although this would need to be pursued.
- 10.2.9 It is unclear whether the scale of development will require the creation of new neighbourhoods and neighbourhood centres, particularly to the north, east and south. It is important that these areas do not outcompete existing neighbourhood centres or detract investment from the centre. There are also concerns that development, particularly in the south, will not be supported by sufficient transport infrastructure and public transport.

## Industrial and employment areas

- 10.2.10 This growth option will likely lead to significant positive effects for the town's existing industrial and employment areas due to its increased overall mass. It is anticipated that an enlarged population will support and attract a greater range of services and facilities as well as provide an expanded labour pool. However, to maximise these benefits it is essential that existing issues of congestion are reduced. Transport links to, and facilities at, existing industrial and employment areas may need to be improved in order to capitalise upon new development and an increased local employee catchment.
- 10.2.11 It is unclear whether the scale of development will necessitate the creation of new employment sites in the growth areas, particularly to the north of Harlow. This would need careful planning and phasing, and investment in existing employment sites would be needed to support diversification of Harlow's economy, plans for research and development, and improving Harlow as a place to both live and to work.

## 10.3 Topics

- 10.3.1 This section sets out the appraisal of the spatial approach option against the topics of the SA framework. The 'community and wellbeing' sub-section also incorporates equalities considerations. Table 16 summarises the significance of the expected impact.

**Table 16: Appraisal of option D against the SA framework topics**

Key											
Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)				Uncertain impact / insufficient information (?)			Negative impact (-)			
Option	Air	Biodiversity	Climate change	Community	Economy	Historic	Housing	Land	Landscape	Transport	Water
Option D - Regeneration led	-	-	?	?	+	-	?	-	-	?	-

### Air

- 10.3.2 Although no AQMAs have been declared in the proposed development areas for this option traffic emissions (particularly from the M11 and the A414) are identified as the most significant source of air pollution in Harlow. The delivery of high levels of additional housing will likely lead to increased congestion across the district and will likely lead to a deterioration of air quality. Spreading development to the north, west, south and (within the) east could spread traffic across the district and thus minimise the possibility of congestion. However, it is important that appropriate transport infrastructure is delivered across the district in order to meet the demands of a larger population. In particular, there are concerns that the level of development proposed in the south can not be supported by transport infrastructure, and this could have implications for increased congestion and reduced air quality and the need for a greater range of transport options.

## Biodiversity and green infrastructure

- 10.3.3 There are a number of biodiversity constraints and areas of greenfield land of biodiversity value in and around Harlow. Although spreading development to the north, east, south and (within the) west may minimise the possibility of impacting upon designated sites, negative impacts on biodiversity (e.g. indirectly) are still anticipated. In particular, there are a number of County Wildlife Sites, protected wildlife verges and a large amount of open space in the eastern growth area. The large amount of development proposed to the north (of the spatial options, the second largest number of dwellings) could also impact upon the River Stort and its healthy population of otters. Although the comparatively large amount of development to the south of Harlow should not be on any biodiversity constraint sites, in addition to being on greenfield it is near to SSSIs and Local Nature Reserves in the southwest of the district which could be indirectly negatively affected. Overall, there would be a loss of open space across Harlow, but equally there is also an opportunity for district-wide improved access to open spaces and for biodiversity gains through green infrastructure and design.
- 10.3.4 It is possible that green wedges, watercourses and other features in Harlow District – that could play a role as wildlife corridors and other linkages – may be disrupted by new development. Under this spatial option, there is a concern for green wedges extending to the north and south and potentially for the River Stort (unless development facilitates better management of this area).

## Climate change (mitigation and adaptation)

- 10.3.5 Increased levels of population and employment will most likely lead to an absolute increase in greenhouse gas emissions, particularly in the short to medium term. However, the scale of development presents the opportunity to achieve a step change in the nature of development and could facilitate decreasing per capita emissions in the medium term and lower absolute emissions in the longer term. In addition, the potential for renewable energy generation (e.g. waste-to-energy), sustainable design and construction techniques and a transport modal shift are significant opportunities presented by this option. However, it is uncertain whether the scale of development to the west, south and (within the) east will be large enough to support some of these options as a part of developing a sustainable community.
- 10.3.6 The majority of development is proposed for areas in Flood Risk Zone 1. However, there are areas to the north and eastern parts of Harlow which are in Flood Risk Zone 3 and new development should avoid these areas and avoid exacerbating flood risk elsewhere. In particular, the large amount of development proposed to the north of Harlow could be at risk of flooding along the River Stort. There is also the potential for increased risk of surface water flooding as a result of new development. However, by spreading out the development under this spatial option it may be possible to avoid areas of flood risk and by building in features such as SUDS and green infrastructure in to design it may be possible to mitigate surface water flooding. Development in the north should look at ways to minimise flooding from the Stort and this could include policies to enhance the river as a landscape feature, for biodiversity value and for recreational value.
- 10.3.7 Climate change can impact on species dispersal and adaptation and new development could impact on buffering (e.g. maintaining wildlife corridors). This was also discussed under the biodiversity and green infrastructure topic.

## Community and wellbeing

- 10.3.8 Recent years has seen an increase in social exclusion and deprivation alongside urban decay in Harlow. The scale of development should provide significant opportunities to redress this trend due to employment opportunities that are presented both in construction and the associated increased services and facilities required by a growing population. However, as the least deprived areas are located towards the outskirts of town (adjacent to the growth options) it is not clear how the benefits of growth in terms of regeneration will be felt in deprived neighbourhoods. Nevertheless, there are areas experiencing deprivation to the south of the town and these may benefit from appropriately phased growth in adjacent areas. By spreading the proposed development between the north, west, south and (within the) east, this spatial option should be particularly effective at addressing deprivation district-wide and in preventing any inequalities as a result of development, and it should support regeneration initiatives to the south of the town. However, it will be important to ensure existing neighbourhoods receive a share of investment and can access the benefits of new development, and that new development creates a distinct sense of community but is also integrated with the rest of Harlow. Infrastructure will need to support this.
- 10.3.9 In the proposed northern development area, reliance on existing community infrastructure such as schools, community centres and medical facilities would risk coalescence with Sawbridgeworth and also dilute any sense of place and belonging in the new community, distancing it from Harlow in the public consciousness. Local community facilities should be provided to make the development area self sustaining. New, universally accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.
- 10.3.10 Community facilities in Churchgate Street and Old Harlow may suffice in the short term to sustain the new eastern development with additions and extensions, but would need overhauling at some point in the future due to the substantial new development being proposed. This suggests a programme of phasing-in community facilities.
- 10.3.11 Growth in the southern development area would also need to be supported by new community facilities, given the limited connectivity of these areas to the town centre by public transport. The western development area may be sustained by existing facilities in the short term, given the small quantum of development in this area. Existing infrastructure may sustain the western development in the short term, given the low quantum of development proposed in this area. Continued reliance on existing public transport infrastructure in the south and west of Harlow may result in people without cars being disadvantaged. Older people and people with low incomes are very likely to be socially excluded in this scenario. Disabled people, older people as well as others requiring care services may be adversely affected by the development areas' poor connectivity to the town centre or other neighbourhood centres. The southern and western development areas will also be less connected to London, Cambridge, Stansted and the wider region than the northern and eastern areas, due to the absence of railway stations in their proximity.
- 10.3.12 The southern and western proposed development areas include existing farming and agricultural activities. Balancing the natural attributes of the landscape with new housing, services and other urban opportunities, will be a challenge. In addition, the proposed development area towards the south of Harlow contains an authorised Gypsy and Traveller site. Unless travelling communities are canvassed for engagement with the LDF process, and

especially over new developments in close proximity to authorised pitches, these communities are likely to face social exclusion.

- 10.3.13 Given high obesity and diabetes figures for the district, any encouragement and provision for exercise and active recreation is likely to have a positive effect on human health. In this context, parks, woodlands and recreational areas included within development areas may play a part in alleviating health deprivation. Recreation activities are also likely to be beneficial to young people and may redress a high incidence of teenage pregnancy and low incidence of participating in physical activity. River Stort Navigation Way in the north and Harlow Woods, Mark Bushes, Latton Park and Harlow Park in the South, as well as Forest Way and Stort Valley way offer significant opportunities for recreational activities.
- 10.3.14 Socioeconomic profiles for the district's wards show homogeneity across the board with a predominant white population, with small pockets where other ethnicities live, such as parts of Little Parndon, Hare Street and Mark Hall. This implies that the existing communities are defined along ethnic and other cultural lines, which would pose a challenge to social cohesion and to civic participation by new residents in any area.
- 10.3.15 Potential growth, particularly to the south, west and east must strongly consider the potential positive contribution that could be made towards reducing high levels of crime. It is not clear whether this would be possible for this (or any) growth option, particularly in the short to medium term.

### **Economy and employment**

- 10.3.16 The growth option will likely lead to significant positive effects for the town's economy and employment due to its increased overall mass, attracting a greater range of services and facilities as well as provide an expanded labour pool including for existing employment areas. In the short term the high levels of housing growth would support a high number of jobs in this area with associated positive impacts on local building suppliers across the district. This option may also facilitate the delivery of transport infrastructure and would need to be supported by adequate transport routes, sustainable transport options from residential areas to employment areas, and policies to prevent the exacerbation of congestion.
- 10.3.17 It is unclear whether the scale of development will allow for the creation of new employment sites in the growth areas, particularly to the north of Harlow where a large amount of housing is proposed. This would need careful planning, phasing and investment to deliver employment sites that will also support diversification of Harlow's economy and plans for research and development. Investment will also be needed to improve Harlow both as a place to live and to work, and education, skills and training will need to complement economic development. Development in the south in particular could address an area of high deprivation in terms of education, skills and training.
- 10.3.18 Growth to the north and east will need to include complementary (and not competing) employment opportunities so as not to detract from the regeneration of the town centre. The proximity of development to the north and within the east to Harlow Town and Harlow Mill rail stations should facilitate outward commuting towards key employment hubs such as London, Cambridge and Stansted Airport. In this option, a large amount of development to the south is planned (and some to the west) on predominantly agricultural land which could have a negative impact on employment.

## Historic environment

- 10.3.19 The areas identified for development include SAMs, listed buildings, and Conservation Areas. The overall scale of development is substantial and there is a strong likelihood that some of these historic features could experience negative direct and indirect effects from development and increased visitor pressure. However, this spatial option spreads development to the north, west, south and east and this might assist in the avoidance and mitigation of negative impact.
- 10.3.20 Of all the spatial options, this option proposes the most development to the south of Harlow. There are SAMs in this area that may be impacted by development in addition to some listed buildings. A large amount of development is also proposed to the north which may indirectly impact upon registered parks and gardens. However, residents could also benefit from the proximity of these sites and, where appropriate, development could seek to protect and enhance these sites.

## Housing

- 10.3.21 The level of potential growth should provide significant opportunities for high levels of affordable housing provision. The high rates of housing delivery could also help to reduce the cost of home ownership in the area thereby improving overall affordability, improving the IMD for Housing and Barriers to Services and lowering the high levels of homelessness within the district.
- 10.3.22 Although this spatial approach spreads the development to different areas, comparatively to the other spatial options less housing is proposed to the west and east of Harlow. The east and west of the district are the most deprived areas for housing and barrier to services. This issue might therefore be exacerbated.
- 10.3.23 The spatial option does not outline plans for gypsies and travellers pitches.

## Land

- 10.3.24 The majority of areas proposed for development include primarily undeveloped Grade 2 agricultural land. This approach to development is in contrast to the emphasis towards prioritising development on PDL. Although a large amount of development is planned for the north where there is some Grade 3 land, comparatively to the other spatial options this approach proposes the most development to the south of Harlow which is primarily Grade 2 land. Development would also include areas designed as metropolitan Green Belt.
- 10.3.25 Harlow has low rates of recycling but high rates of waste disposed at landfill. Positive impacts may be experience due to opportunities to improve recycling rates and bring forward innovative processing technologies such as waste-to-energy, particularly as part of the creation of large new communities e.g. to the north.

## Landscape

- 10.3.26 Comparatively to the other spatial options, this option locates a large amount of development to the north and south of the district. This is likely to have significant landscape impacts. Although the proposed development lies outside Special Landscape Areas there could be a negative impact at least indirectly from development. Furthermore, the landscape to the north and south has a high degree of sensitivity to substantial urban development whereas,

comparatively to the other spatial options, this approach proposes a small amount of development within the east of Harlow where there is a lower degree of landscape sensitivity.

- 10.3.27 Development to the north of Harlow could potentially lead to visual coalescence with Sawbridgeworth. In addition, the Stort Valley acts as a barrier between the town and the landscape to the north, and developing the land in this area could have repercussions in terms of landscape, 'views' from the town, and acting as a physical barrier deterring integration with Harlow. There is also potential for development to conflict with the 'green wedge' design of Harlow and the landscape-led approach of the Gibberd masterplan. Additionally, the ridgeline to the south of Harlow provides a significant constraint on the scale of development and provides a southern edge and setting for the town that could be affected.

### Transport

- 10.3.28 The high levels of development close to Harlow Town and, to a lesser extent, Harlow Mill rail stations present significant opportunities for increasing rail usage; however there are also existing capacity constraints on this rail line. In addition, the high concentrations of large-scale development will also require increased public bus transport to and from these areas. Whilst development to the south and west is not in close proximity to rail stations, public bus services could provide access to these as well as London underground station in Epping. The proximity of existing employment sites and opportunities for integrating green infrastructure within the design of new development will likely promote sustainable travel modes such as cycling and walking. Spreading the development to all sides of the district, as per this spatial option, may enhance transport links across the district and facilitate the delivery of key transport infrastructure, particularly in the north.
- 10.3.29 However, there is a concern that transport infrastructure may not be able to support the large amount of development to the south. The high levels of development will also result in increased traffic across an already congested network and may also require significant upgrades (for example, a new northern distributor road, motorway junction and link road and bridge across the Stort). These improvements would further promote unsustainable transport patterns and work against some DaSTS objectives and facilitating modal shift. Good public transport corridors and sustainable travel options (including rail, cycle and footpath) will need to be offered, or this spatial option could result in immobile and isolated communities, congestion and significant negative impacts for both new development and existing neighbourhoods. Development in the north offers the opportunity to integrate sustainable transport modes with employment sites and to enhance key public footpath and cycle path assets such as the Stort Valley Way and Three Forests Way.
- 10.3.30 The phasing of transport infrastructure will be critical in achieving modal shift over the long term and therefore must be fully put in place before residents move into the new growth areas.

### Water

- 10.3.31 Harlow is located in an area of severe water stress and has a daily domestic per capita consumption use which is significantly higher than the national average. Whilst there is identified capacity to provide water resources to meet planned growth to 2021 water resources in the area are either over-abstracted or over-licensed. Therefore, the high levels of growth under this option would place additional pressure on existing water resources, particularly in the north.

- 10.3.32 The large scale of development that is proposed according to this option would, however, facilitate the implementation of high water efficiency standards and the incorporation of SuDS through the design of a sustainable urban extension. It would be important that development in the north takes into account and avoids any potential impact on the River Stort.
- 10.3.33 It should be noted that there are no significant differences between any of the spatial options in terms of their impacts against this topic.

## 10.4 How can we mitigate / enhance effects (Scott Wilson’s recommendations to the Council)?

- 10.4.1 From the appraisal of Regeneration led option the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

SA framework	Mitigation recommendations
Town Centre	<ul style="list-style-type: none"> <li>To avoid losing the increased customer catchment to the north, it would be important to ensure that the town centre has a substantial and attractive retail offer that can meet increased demand and that transport links to the Town Centre are adequate, particularly given the barrier created by the railway line.</li> <li>As part of this option, ensure that development is encouraged within Harlow Town North and seek opportunities to with the train station and development of the Stort Valley.</li> <li>Enhance transport links in to the town centre.</li> </ul>
Eastern growth area	<ul style="list-style-type: none"> <li>There are opportunities for enhancements to accessibility, setting and biodiversity value for the local community (particularly in the east) and Harlow more widely..</li> <li>Open space should be enhanced where appropriate.</li> <li>Seek opportunities for improvements / investment in develop Churchgate Street, Old Harlow and the new development at Newhall.</li> <li>Ensure new development in the eastern growth area is supported by sufficient community, employment and transport infrastructure.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>Ensure that development (and any new neighbourhoods or neighbourhood centres) does not impact upon the viability of neighbourhoods throughout the District or detract investment from the centre.</li> <li>Spread investment throughout the district in order to regenerate and generally improve the urban fabric and existing community infrastructure. This should assist existing neighbourhood centres to capitalise on new residents and ensure improved facilities for existing and new residents.</li> <li>Improvements to transport would be needed to facilitate movement throughout the district and public transport in the south. Sustainable forms of transport and green infrastructure, including cycle and footpaths, should be promoted through the district to neighbourhood centres and linking to new development and employment opportunities.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>It is essential that existing issues of congestion are reduced and transport links are improved.</li> <li>Consider improving existing employment offer and transport links (e.g. sustainable transport links with residential areas) in order to capitalise upon development and to create a better working environment</li> <li>If the creation of new employment sites in the growth areas, particularly to the north of Harlow, is necessary; careful planning and phasing.</li> </ul>

SA framework	Mitigation recommendations
Air	<ul style="list-style-type: none"> <li>Strong supporting policies for train travel and other forms of sustainable travel that limit car reliance, across the district but particularly in the south. Explore opportunities with the railway route, Epping Forest underground station, National Cycle Route 1 and other green transport corridors.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Direct impacts on sites with potentially high biodiversity value (e.g. County Wildlife Sites, River Stort and Valley, SSSIs, LNRs and protected wildlife verges) and high quality open space, should be avoided</li> <li>Enhance biodiversity and the quality and accessibility of open space district-wide e.g. by building green infrastructure and biodiversity-enhancement measures into development and by improving the habitat of the River Stort and Valley.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>Transport and strategic routes (road, rail, cycle and foot) requirements would need to meet the scale of development and seek to minimise unsustainable forms of transport</li> <li>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.</li> <li>There is an opportunity on the flood plain to create green infrastructure and wetland habitat and to enhance the river Stort as a landscape feature for biodiversity value and for recreational value, without creating a physical barrier in Harlow.</li> <li>Explore the potential for renewable energy generation (e.g. waste-to-energy), sustainable design and construction techniques and facilitating a transport modal shift, as a part of developing sustainable communities.</li> <li>Build flood mitigation features in to design such as SuDS and green infrastructure.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>Offering a good range of employment and facilities and services in the north could address a trend of outmigration from Harlow and create a self sustaining urban extension. The southern development area would benefit from new facilities as well, given its limited connectivity to the town centre and other neighbourhood centres. It would be suitable to roll out a phased programme of community facilities provision to service the eastern development area, starting from extensions to existing facilities and ending in new or overhauled facilities.</li> <li>New accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.</li> <li>Improve existing and provide new access to sustainable transport, particularly to southern and western development areas, but also increasing connectivity between the different parts of Harlow and the proposed extensions.</li> <li>Gypsy and Travellers need to be engaged in the LDF process, especially over new developments in close proximity to authorised pitches.</li> <li>The use of agricultural land for housing development should be avoided if possible and the agricultural community should be brought into the debate. Further education, adult education and skills training programmes can be beneficial to help sections of the community currently living off the land, become better suited to the new employment and lifestyle opportunities that will be open to them in future.</li> <li>Levels of recreational provision should not be reduced by new development and look to ways to enhance recreational activities and to maintain, extend and enhance walking and cycling networks through areas of natural beauty.</li> <li>Invest in programmes of multicultural events to promote social cohesion between diverse and somewhat isolated communities and new population.</li> </ul>

SA framework	Mitigation recommendations
	<ul style="list-style-type: none"> <li>• Coalescence between development to the north of Harlow and existing settlements should be avoided where possible.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Growth to the north (and east) will need to include complementary (and not competing) employment opportunities so as not to detract from the regeneration of the town centre.</li> <li>• Facilitate the delivery of supporting transport infrastructure and sustainable transport options e.g. from residential areas to employment areas and address issues of congestion. Explore the potential economic benefits of the rail line.</li> <li>• Provide enough employment opportunities and facilities to meet district-wide needs and the diversification of the economy.</li> <li>• Invest in any new and existing employment areas to makes Harlow both a good place to live and work.</li> <li>• Improve the skills and education of Harlow's residents, particularly in the south.</li> <li>• Careful planning and phasing of any new employment sites.</li> <li>• Avoid a negative impact on the agricultural economy (particularly to the south).</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Development which may lead to direct negative effects on SAMs, listed buildings, Conservation Areas and Registered Parks and Gardens in the area should be avoided.</li> <li>• Policies requiring the protection of Conservation Areas, listed buildings and SAMs should be produced.</li> <li>• Look at opportunities to enhance historic assets and, where appropriate (i.e. where there is low likelihood of negative impact as a result of visitors), for residents to benefit from these assets.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Plans for gypsies and travellers pitches will need to be considered.</li> </ul>
Land	<ul style="list-style-type: none"> <li>• A Green Belt review should be undertaken prior to approval of development.</li> <li>• Policies for renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible.</li> <li>• An agricultural land survey could be undertaken to ensure that only the lowest quality land is brought forward for development.</li> <li>• Opportunity to explore waste to energy initiatives and other reuse, recycling and waste schemes, particularly as part of urban extensions and new sustainable communities.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Coalescence between north of Harlow and Sawbridgeworth and surrounding settlements should be avoided.</li> <li>• Although there is likely to be less pressure on SLAs located to the south and west of the district, negative impacts may be cumulatively minimised by splitting the growth and thus pressure between the four areas.</li> <li>• Safeguarding policies for green wedges and the River Stort are expected to be included in the Core Strategy.</li> <li>• There is very little that can be suggested in terms of minimising the significant negative effects that are likely to occur from this development option on landscape character.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in, to ensure that good sustainable travel habits are formed.</li> <li>• Development may require demand management measures and improvements to access routes to discourage additional congestion and minimise trip generation.</li> </ul>

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SA framework	Mitigation recommendations
Water	<ul style="list-style-type: none"><li data-bbox="641 398 1348 454">• Integrate sustainable transport modes to assist with access to development and employment sites.</li><li data-bbox="641 472 1449 528">• Strong policies are required to minimise water use and maximise water efficiency.</li><li data-bbox="641 528 1417 584">• The proposed development at Rye Meads STW will be an important additional consideration.</li></ul>

## 11 What will be the situation with the plan (Option E – Sustainable transport led)?

### 11.1 Introduction

11.1.1 This Chapter appraises option E (Sustainable transport led) against the SA spatial areas and topics (the SA framework). This is one of the following six spatial approaches as set out in the Core Strategy Issues and Options Paper and Chapter 3 of this document:

1. Option A – RSS: Northern led
2. Option B – Policy led 2
3. Option C – Combined criteria led
4. Option D – Regeneration led
5. **Option E – Sustainable transport led**
6. Areas of search and potential housing distributions

11.1.2 The spatial option is illustrated in Figure 8 and is described in the box below, as taken from the Core Strategy Issues and Options document.

#### Option E – Sustainable transport led

This approach is based upon the identification of potential broad locations for new housing and distributions based upon areas that can benefit from existing or enhanced transport provision. This focuses growth to the east of Harlow with smaller distributions to the west and north. This shows distributions that have sufficient critical mass that would support regeneration and the provision of key infrastructure close to existing rail stations together with enhancement of cycleways and footpath links. However this approach is likely to have a significant effect on the character and setting of Roydon to the west of Harlow.

Figure 8: Option E - Sustainable transport led



## 11.2 Spatial areas

11.2.1 This section sets out the appraisal of the spatial approach option against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 17 summarises the significance of the expected impact.

Table 17: Appraisal of option E against the SA framework spatial areas

Key			
Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)	Uncertain impact / insufficient information (?)	Negative impact (-)

Option	Town Centre	Eastern growth area	Neighbourhoods	Industrial & employment areas
Option E - Sustainable transport led	+	-	?	?

### Town Centre

11.2.2 This spatial option would likely to lead to positive effects on the Town Centre. In particular, the development to the north should provide an impetus to improve connectivity from the north of the railway to the town centre and, combined with the proposed Town Centre North proposal,

should help bring about regeneration, improved access and a stronger sense of place helping address levels of deprivation in this area.

- 11.2.3 The extent to which the eastern development would contribute positively to the Town Centre is less certain considering its proximity to the M11 and the Lakeside and Bluewater shopping centres. Furthermore, developments of this size are also likely to support neighbourhood centres providing daily facilities and services.

### Eastern growth area

- 11.2.4 The main impacts identified from this growth option will be the impact of the development in the east on the loss of open space and historic assets and transport. Development is also likely to result in increased traffic congestion on the A414 to the M11 motorway.

### Neighbourhoods

- 11.2.5 This growth option is unlikely to have any major impacts on existing neighbourhood centres as each of the growth areas are likely to be large enough to be relatively self sufficient in day-to-day services and facilities. However, the extent to which they would warrant new schools and health facilities is unclear at this stage and, in the case whereby neighbouring services would have to accommodate increased demand, adequate support for these services would be required.

- 11.2.6 However, it is unclear whether the viability of the neighbourhood centres to the south will be negatively affected by development to the north, west and east; and it would be important for new development not to detract investment in the south, particularly given that poor accessibility and public transport facilities could be exacerbated.

### Industrial and employment areas

- 11.2.7 This growth option will likely lead to significant positive effects for the town's existing industrial and employment areas due to its increased overall mass. It is anticipated that an enlarged population will support and attract a greater range of services and facilities as well as provide an expanded labour pool. However, to maximise these benefits it is essential that existing issues of congestion are reduced.

- 11.2.8 This spatial option would likely lead to significant positive effects for the town's existing industrial and employment areas, in particular the Pinnacles and Templefields industrial areas which will benefit from an increased labour pool in the local vicinity. The enlarged population in and around these areas could lead to increased congestion on the road network which could impact business operations.

## 11.3 Topics

- 11.3.1 This section sets out the appraisal of the spatial approach option against the topics of the SA framework. The 'community and wellbeing' sub-section also incorporates equalities considerations. Table 18 summarises the significance of the expected impact.

**Table 18: Appraisal of option E against the SA framework topics**

Key											
Positive impact (+)		Neutral impact / balance of positive and negative impacts (0)				Uncertain impact / insufficient information (?)			Negative impact (-)		
Option	Air	Biodiversity	Climate change	Community	Economy	Historic	Housing	Land	Landscape	Transport	Water
Option E - Sustainable transport led	-	-	?	?	+	-	+	-	?	?	-

### Air

- 11.3.2 Consolidated development in three areas is likely to add to air quality issues in and around these locations; however, on balance the scale of developments should present opportunities to capitalise on measures to reduce air pollution that may not otherwise be possible on smaller scale developments. Emissions of NO<sub>2</sub> and PM<sub>10</sub> from road traffic (particularly the M11 and A414) represent the main air quality issues for the district and it will be important to ensure realistic alternative sustainable transport choices are available to mitigate any future growth in emissions. Locating housing in close proximity to employment areas should help reduce commuting distances and associated emissions.
- 11.3.3 Locating development to the west, north and east could encourage use of the railway line, but may discourage use of the underground station in Epping to the south of Harlow and increase car reliance given the current poor public transport service in the south. This could negatively impact on air quality.

### Biodiversity and green infrastructure

- 11.3.4 The proposed development to the north and east are likely to impact on a number of wildlife sites and a local nature reserve. The northern development area could potentially impact on the Rye Meads SPA, the Roydon Mead SSSI and the River Stort including its otter population.
- 11.3.5 The three proposed development sites will require significant land take of open space impacting on the biodiversity and green infrastructure in these locations. However, the scale of each development should present opportunities to incorporate green infrastructure.
- 11.3.6 It is possible that green wedges, watercourses and other features in Harlow District – that could play a role as wildlife corridors and other linkages – may be disrupted by new development, particularly to the east.

### Climate change (mitigation and adaptation)

- 11.3.7 Increased housing and employment growth in the short term will lead to increased greenhouse gas emissions; however, in the medium to longer term the scale of development could present an opportunity for a step-change in the way people live and work and could ultimately result in a decrease of per capita emissions. Planned growth of this size located close to employment centres may present opportunities for a variety of low carbon initiatives including renewable energy schemes and low carbon technologies such as energy from waste for district heating and power. Locating housing growth and employment centres in close vicinity should result in reduced commuting distances and greater opportunities for people to walk or cycle to work.

Furthermore, the growth locations near to existing train stations will also facilitate more sustainable transport options for those commuting outside of the district.

- 11.3.8 In terms of flood risk, the majority of development is proposed for areas in Flood Risk Zone 1 so the risk of fluvial flooding is low. However, in terms of this growth option, the north eastern parts of Harlow are in Flood Risk Zone 3 and it is important that development avoids this area as well as avoids exacerbating flood risk elsewhere. There is also the potential for increased risk of surface water flooding as a result of new development but this could be addressed by flood mitigation measures.
- 11.3.9 Climate change can impact on species dispersal and adaption and new development could impact on buffering (e.g. maintaining wildlife corridors). This was also discussed under the biodiversity and green infrastructure topic.

### Community and wellbeing

- 11.3.10 The majority of development for this option is located in the north and east of Harlow. Reliance on existing community infrastructure such as schools, community centres and medical facilities in this area could risk coalescence with Sawbridgeworth and also dilute any sense of place and belonging in the new community, distancing it from Harlow in the public consciousness. A similar impact could also occur due to the development to the west and effectively drawing Roydon into the wider fabric of Harlow. The size of developments should allow local community facilities to be provided to make the development areas self sustaining. New, universally accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.
- 11.3.11 Community facilities exist in Churchgate Street and Old Harlow but are inadequate to sustain the new eastern development area of 5390 potential future homes. The eastern development area currently had limited public transport links into the town centre and other Harlow neighbourhood centres, but would have good links to the wider region, Stansted, Cambridge and London via the M11 and the two railways stations nearby. This may promote a car-reliant out-commuting culture. Older people and people with low incomes are very likely to be socially excluded in this scenario.
- 11.3.12 Disabled people, older people as well as others requiring care services may be adversely affected by the eastern and western development areas' poor connectivity to the town centre or other neighbourhood centres. This is also true of the western development area, unless public transport infrastructure is improved.
- 11.3.13 The proposed development area to the west includes the village of Roydon (with Roydon railway station) and adjoins the Harlow wards of Hare Street, Little Parndon, Great Parndon, Sumners and Kingsmoor. Existing facilities in these wards are inadequate to sustain 3,080 new homes.
- 11.3.14 There are no proposed development areas towards the south of Harlow, hence this option is unlikely to impact on the two authorised Gypsy and Traveller sites in this area.
- 11.3.15 Given high obesity and diabetes figures for the district, any encouragement and provision for exercise and active recreation is likely to have a positive effect on human health. In this context, parks, woodlands and recreational areas included within development areas may play a part in alleviating health deprivation. Recreational activities are also likely to be beneficial to young people and may help to redress a high incidence of teenage pregnancy and low

incidence of participating in physical activity. River Stort Navigation Way in the north and Hudson Mead SSSI, Cannons Brook Golf Club offer significant opportunities for recreational activities.

- 11.3.16 Socio-economic profiles for the district's wards show homogeneity across the board with a predominant white population, with small pockets where other ethnicities live, such as parts of Little Parndon, Hare Street and Mark Hall. This implies that the existing communities are defined along ethnic and other cultural lines, which would pose a challenge to social cohesion and to civic participation by new residents in any area.
- 11.3.17 All the development areas include existing farming and agricultural activities. Balancing the natural attributes of the landscape with new housing, services and other urban opportunities, will be a challenge.

### **Economy and employment**

- 11.3.18 The location of all the proposed growth areas within close proximity to existing employment areas will give businesses access to a wide local labour pool. The high levels of growth should provide an impetus and support additional services and facilities which if well managed should complement the existing economy. Higher levels of growth would enhance Harlow's role as a regional centre and lead to an overall improvement in the District's economy.
- 11.3.19 Locating growth within close proximity to the main employment areas and Harlow Mill, Harlow Town and Roydon railway stations should mitigate to some degree the projected increase in road traffic anticipated with development of this scale.
- 11.3.20 The new development areas would require significant land take including large tracts of agricultural land. This may have negative consequences for those working in the industry.

### **Historic environment**

- 11.3.21 The areas identified for development include scheduled ancient monuments, listed buildings and conservation areas. Given the large scale of development proposed in these locations, it is likely that some of the town's historic fabric could experience negative impacts from development. All three development areas are likely to impact on Harlow's historic environment, in particular, increased traffic emissions could impact the conservation areas in the north-east of Harlow and damage the building fabric of listed buildings within these areas.

### **Housing**

- 11.3.22 The level of potential growth should provide significant opportunities for high levels of affordable housing provision. The high rates of housing delivery could also help to reduce the cost of home ownership in the area thereby improving overall affordability, improving the IMD for Housing and Barriers to Services and lowering the high levels of homelessness within the district. Large scale new build should provide opportunities for economies of scale in delivering housing that can be climate-proofed and adaptable to meet the changing demands of its residents, including the elderly and disabled residents. In particular, housing located to the west and also to the east should have a positive impact on high levels of housing deprivation in these areas (particularly to the west), however no housing is located to the south where deprivation also exists.

11.3.23 Although it is unlikely that the proposed growth areas would detract from regeneration efforts within Harlow town centre, depending upon the nature of service provision proposed in the growth areas they may not necessarily contribute significantly to its economic regeneration. The extent to which the growth areas are to be self sufficient could impact on Harlow's wider regeneration agenda, particularly where the trend continues for the majority of the town's catchment choosing to shop away from Harlow.

11.3.24 The spatial options does not outline plans for gypsies and travellers pitches.

### Land

11.3.25 The proposed growth area would be delivered predominantly on grade 2 agricultural land comprising arable farmland, grassland and some woodland, although a substantial amount of development is planned for the north where there is some Grade 3 land. This approach to development is in contrast to the emphasis towards prioritising development on PDL. Development to the north could impact the functionality of the green wedge spreading north-eastwards from the town centre, leading to its enclosure by the proposed growth area. Development would also include areas designed as metropolitan Green Belt. Furthermore, the development areas to the north and west could both lead to coalescence with Sawbridgeworth and Roydon.

11.3.26 Harlow has low rates of recycling but high rates of waste disposed at landfill. Positive impacts may be experience due to opportunities to improve recycling rates and bring forward innovative processing technologies such as waste-to-energy, particularly as part of the creation of large new communities e.g. to the north, west and east.

### Landscape

11.3.27 While the areas identified for development lie outside Special Landscape Areas the proposed developments to the north and east are likely to be within close proximity and could lead to significant negative effects. Although comparative to other spatial options the quantum of development to the north of Harlow is smaller, it could lead to coalescence with Sawbridgeworth. The significant growth to the west could impact upon the Western Fringe and coalescence could occur with Roydon and other communities to the west of Harlow.

11.3.28 However, the significant quantum of development to the east is located in an area of low landscape sensitivity to substantial urban development and thus may be better located to absorb landscape impact than other locations. In addition, this option does not place development to the south where the ridgeline provides a southern edge and setting for the town that could be affected.

### Transport

11.3.29 The proposed development to the north of Harlow presents opportunities to capitalise on the railway stations at Harlow Town and Harlow Mill. The proposed development to the east of Harlow should also benefit from its close proximity to Harlow Mill railway station and the development to the west will be able to capitalise on its close proximity to Roydon railway station.

11.3.30 This option is based upon areas that can benefit from existing or enhanced transport provision and there could be a potential positive impact on transport if it is accompanied by appropriate supporting infrastructure and investment. Without investment, although the northern and

eastern developments would benefit from relatively easy access to the A414, the western development is likely to be less well connected and would likely result in significantly increased traffic levels through Roydon accessing the A414 to the north and across the centre of Harlow in order to reach the M11 motorway to the east. In addition, the scale of development in all areas should provide opportunities to facilitate a modal shift towards more sustainable forms of transport; however, the eastern and northern developments will have relatively easy access to the M11 and therefore are likely to result in an increase in road traffic and continued reliance on the private car. New road upgrades, for example a new northern distributor road, motorway junction and link road and bridge across the River Stort, could relieve congestion; however it would also further promote less sustainable transport patterns and work against some DaSTS objectives in facilitating modal shift. It is unclear whether the scale of housing proposed to the north will facilitate the delivery of necessary transport links to the rest of Harlow and to generate substantial investment in to key cycle paths and foot paths such as the Stort Valley Way and Three Forests Way.

- 11.3.31 The proximity of the new development areas to existing and proposed employment areas should help facilitate a shift towards more sustainable travel choices for people living within close distance to work, such as walking and cycling.
- 11.3.32 The phasing of transport infrastructure will be critical in achieving modal shift over the long term and therefore must be fully put in place before residents move into the new growth areas.

### Water

- 11.3.33 Harlow is located in an area of severe water stress and has a daily domestic per capita consumption use which is significantly higher than the national average. Whilst there is identified capacity to provide water resources to meet planned growth to 2021 water resources in the study area are either over-abstracted or over-licensed. Therefore, the high levels of growth under this option would place additional pressure on existing water resources.
- 11.3.34 The large scale of development that is proposed according to this option would, however, facilitate the implementation of high water efficiency standards and the incorporation of SuDS.
- 11.3.35 It should be noted that there are no significant differences between any of the spatial options in terms of their impacts against this topic.

## 11.4 How can we mitigate / enhance effects (Scott Wilson’s recommendations to the Council)?

- 11.4.1 From the appraisal of Transport led option the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

SA framework	Mitigation recommendations
Town Centre	<ul style="list-style-type: none"> <li>• To avoid losing the increased customer catchment to the north, it would be important to ensure that the town centre has a substantial and attractive retail offer that can meet increased demand and that transport links to the Town Centre are adequate, particularly given the barrier created by the railway line.</li> <li>• As part of this option, ensure that development is encouraged within</li> </ul>

SA framework	Mitigation recommendations
	Harlow Town North and seek opportunities with the train station and development of the Stort Valley.
Eastern growth area	<ul style="list-style-type: none"> <li>• There are opportunities for enhancements to accessibility, setting and biodiversity value for the local community (particularly in the east) and Harlow more widely.</li> <li>• Open space should be enhanced where appropriate.</li> <li>• Ensure new development in the eastern growth area is supported by sufficient community, employment and transport infrastructure and address concerns regarding congestion.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>• Ensure adequate provision of facilities and services to meet demand, including e.g. health and education facilities.</li> <li>• Ensure that development (and any new neighbourhoods or neighbourhood centres) does not impact upon the viability of neighbourhoods throughout the District – particularly in the south – or detract investment from the centre.</li> <li>• Spread investment throughout the district in order to regenerate and generally improve the urban fabric and existing community infrastructure. This should assist existing neighbourhood centres to capitalise on new residents and ensure improved facilities for existing and new residents.</li> <li>• Improvements to transport would be needed to facilitate movement throughout the district and public transport in the south. Sustainable forms of transport and green infrastructure, including cycle and footpaths, should be promoted through the district to neighbourhood centres and linking to new development and employment opportunities.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>• It is essential that existing issues of congestion are reduced and transport links are improved.</li> <li>• Consider improving existing employment offer and transport links (e.g. sustainable transport links with residential areas) in order to capitalise upon development and to create a better working environment</li> <li>• If the creation of new employment sites in the growth areas, particularly to the north of Harlow, is necessary; careful planning and phasing.</li> </ul>
Air	<ul style="list-style-type: none"> <li>• Strong supporting policies for train travel and other forms of sustainable travel that limit car reliance. Improve links between residential areas and employment sites. Explore opportunities with the railway route and green transport corridors, and how Epping underground station and National Cycle Route 1 will be utilised and public transport in the south will be addressed given that no new development is planned for the south.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>• Direct impacts on sites with potentially high biodiversity value (e.g. County Wildlife Sites, an LNR, the Rye Meads SPA, the Roydon Mead SSSI, and the River Stort) and high quality open space, should be avoided</li> <li>• Enhance biodiversity and the quality and accessibility of open space e.g. by building green infrastructure and biodiversity-enhancement measures into development and by improving the habitat of the River Stort and Valley.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>• Transport and strategic routes (road, rail, cycle and foot) requirements would need to meet the scale of development and seek to minimise unsustainable forms of transport, including reducing commuting distances and car reliance</li> <li>• 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.</li> <li>• There is an opportunity on the flood plain to create green infrastructure and wetland habitat and to enhance the river Stort as a landscape</li> </ul>

SA framework	Mitigation recommendations
	<p>feature for biodiversity value and for recreational value, without creating a physical barrier in Harlow.</p> <ul style="list-style-type: none"> <li>• Explore the potential for low carbon initiatives including renewable energy generation (e.g. waste-to-energy), sustainable design and construction techniques and facilitating a transport modal shift, as a part of developing sustainable communities.</li> <li>• Build flood mitigation features in to design such as SuDS and green infrastructure.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>• All three development areas in this spatial option must include community facilities.</li> <li>• New accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.</li> <li>• Improve existing and provide new access to sustainable transport. The eastern development area would benefit from better public transport links into the town centre and other neighbourhood centre. The town centre should be at least as easy to get to as London or Cambridge for residents of this development area; if not there is a danger that the new dwellings proposed here would serve as a 'commuter belt' for other cities, contributing little to Harlow's civic life. Existing public transport links to the western development area are limited and must be reinforced through, for e.g. more buses plying the same routes, more bus stops and diversions to existing routes to service new developments.</li> <li>• The use of agricultural land for housing development should be avoided if possible and the agricultural community should be brought into the debate. Further education, adult education and skills training programmes can be beneficial to help sections of the community currently living off the land, become better suited to the new employment and lifestyle opportunities that will be open to them in future.</li> <li>• Levels of recreational provision should not be reduced by new development and look to ways to enhance recreational activities and to maintain, extend and enhance walking and cycling networks through areas of natural beauty.</li> <li>• Invest in programmes of multicultural events to promote social cohesion between diverse and somewhat isolated communities and new population.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Growth to the north (and east) will need to include complementary (and not competing) employment opportunities so as not to detract from the regeneration of the town centre.</li> <li>• Facilitate the delivery of supporting transport infrastructure and sustainable transport options e.g. from residential areas to employment areas and address issues of congestion. Explore the potential economic benefits of the rail line.</li> <li>• Invest in any new and existing employment areas to makes Harlow both a good place to live and work.</li> <li>• Improve the skills and education of Harlow's residents, particularly in the south.</li> <li>• Careful planning and phasing of any new employment sites.</li> <li>• Avoid a negative impact on the agricultural economy.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Development which may lead to direct negative effects on SAMs, listed buildings and Conservation Areas in the area should be avoided.</li> <li>• Policies requiring the protection of Conservation Areas, listed buildings and SAMs should be produced.</li> <li>• Look at opportunities to enhance historic assets and, where appropriate (i.e. where there is low likelihood of negative impact as a result of visitors), for residents to benefit from these assets.</li> </ul>

SA framework	Mitigation recommendations
Housing	<ul style="list-style-type: none"> <li>Plans for gypsies and travellers pitches will need to be considered.</li> </ul>
Land	<ul style="list-style-type: none"> <li>A Green Belt review should be undertaken prior to approval of development.</li> <li>Policies for renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible.</li> <li>An agricultural land survey could be undertaken to ensure that only the lowest quality land is brought forward for development.</li> <li>Opportunity to explore waste to energy initiatives and other reuse, recycling and waste schemes, particularly as part of urban extensions and new sustainable communities.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Coalescence between north of Harlow and Sawbridgeworth and west of Harlow and Roydon and other surrounding settlements should be avoided.</li> <li>Although there is likely to be less pressure on SLAs located to the south and west of the district, negative impacts may be cumulatively minimised by splitting the growth and thus pressure between the four areas.</li> <li>Safeguarding policies for green wedges and the River Stort are expected to be included in the Core Strategy.</li> <li>There is very little that can be suggested in terms of minimising the significant negative effects that are likely to occur from this development option on landscape character.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in, to ensure that good sustainable travel habits are formed.</li> <li>Development may require demand management measures and improvements to access routes to discourage additional congestion and minimise trip generation.</li> <li>Integrate sustainable transport modes to assist with access to development and employment sites.</li> </ul>
Water	<ul style="list-style-type: none"> <li>Strong policies are required to minimise water use and maximise water efficiency.</li> <li>The proposed development at Rye Meads STW will be an important additional consideration.</li> </ul>

## 12 What will be the situation with the plan (under the areas of search and potential housing distributions)?

### 12.1 Introduction

12.1.1 This Chapter appraises the areas of search and potential housing distributions against the SA spatial areas and topics (the SA framework). This is one of the following six spatial approaches as set out in the Core Strategy Issues and Options Paper and Chapter 3 of this document:

1. Option A – RSS: Northern led
2. Option B – Policy led 2
3. Option C – Combined criteria led
4. Option D – Regeneration led
5. Option E – Sustainable transport led
- 6. Areas of search and potential housing distributions**

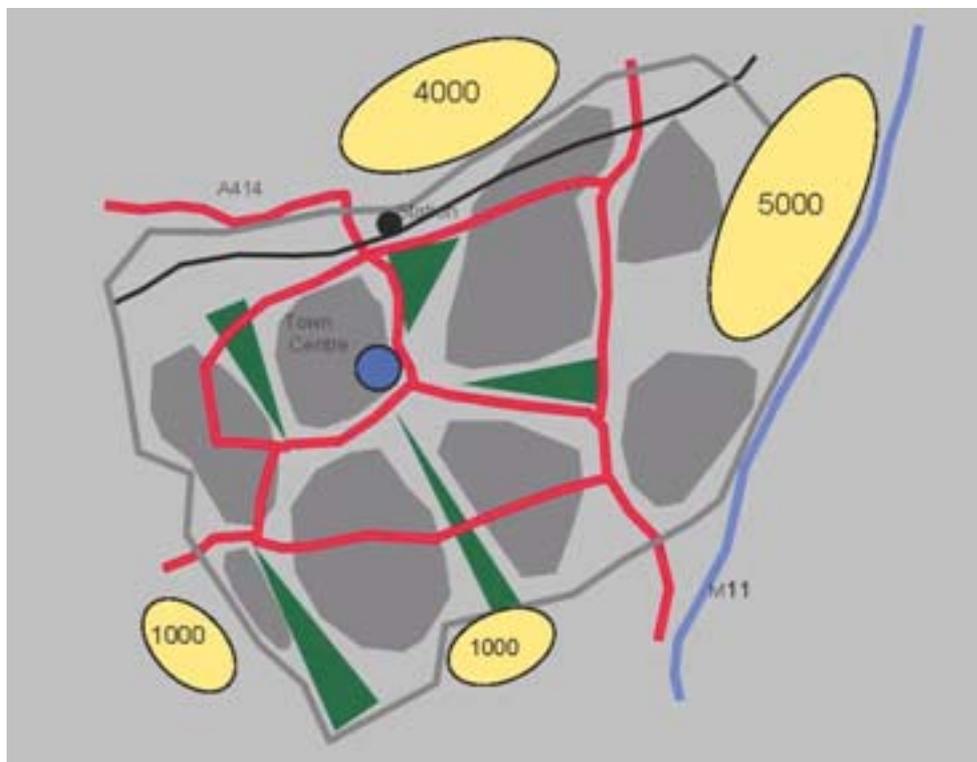
12.1.2 The spatial option is illustrated in Figure 9 and is described in the box below, as taken from the Core Strategy Issues and Options document.

#### Areas of search and potential housing distributions

Following examination of the range of potential options described above and assessing their impact against socio-economic and environmental considerations the consultants suggest the following spatial approach to accommodate the distribution of housing growth.

The Council has not yet reached a view on the appropriate distribution of housing in the area but will take this into account when considering its preferred approach. The exact location and extent of growth will be examined in more detail during subsequent stages in the preparation of the Local Development Framework and will require coordination with adjoining authorities as most of the growth would take place outside Harlow Council's administrative area.

**Figure 9: Areas of search and potential housing distributions**



## 12.2 Spatial areas

12.2.1 This section sets out the appraisal of the spatial approach option against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 19 summarises the significance of the expected impact.

**Table 19: Appraisal of areas of search and potential housing distributions against the SA framework spatial areas**

Key			
Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)	Uncertain impact / insufficient information (?)	Negative impact (-)

Option	Town Centre	Eastern growth area	Neighbourhoods	Industrial & employment areas
Areas of search and potential housing distributions	0	-	?	+

## Town Centre

- 12.2.2 This spatial option should help to reinforce existing service provision and provide impetus for expanded services and facilities within the town centre, providing support for the town centre's regeneration and employers with an increased labour pool. A key to this success will be to understand why over 90% of the town's total catchment currently shop elsewhere. Furthermore, given the scale of development, particularly to the north and east, and the likely requisite local retail provision to meet day to day needs of these areas, measures to reinvigorate and improve the attractiveness of the Town Centre will be required in order for it to become competitive with the Lakeside and Bluewater shopping centres. This is likely to be particularly challenging for the growth area to the east which will benefit from ease of access to the M11 motorway. However, development to the north could help to encourage development within Harlow Town North.
- 12.2.3 Impacts would depend on whether the option is accompanied by a much improved transport infrastructure serving the town centre.

## Eastern growth area

- 12.2.4 The main impacts identified by this growth option will be on loss of open space, historic assets and transport. Although less significant in development to the south, the developments to the north and east will require significant land take. These developments will also lead to increased traffic congestion, particularly on the A414. This may lead to negative effects on the Conservation Areas and distinct settings of Churchgate Street and Old Harlow. It is likely to be difficult to encourage a modal shift from car dependency in the eastern development area to more sustainable transport choices without significant new transport provision.

## Neighbourhoods

- 12.2.5 This growth option is unlikely to have any significant impacts on existing neighbourhood areas, although it may impact on the Conservation Areas and distinct settings of Churchgate Street and Old Harlow within the east of the district.
- 12.2.6 Additional growth should support improved public bus services which will travel through some neighbourhoods and therefore improve connectivity and access. While a larger settlement will provide additional services and facilities it will be important that the additional growth does not place additional pressure on existing community infrastructure.
- 12.2.7 Additional pressures on local retail and service provision may be felt in those areas bordering the proposed growth in the south of the town as their relatively small size may not immediately warrant increased service provisions in these areas and hence they will rely on existing services in nearby neighbourhoods. The larger developments to the north and east should be large enough to warrant self sufficiency in terms of services provision.
- 12.2.8 It is unclear whether the viability of some local services and facilities in the existing neighbourhoods will be negatively affected by the development of similar offers elsewhere in the new growth areas.

## Industrial and employment areas

- 12.2.9 The eastern and northern housing allocation should help in providing an expanded labour pool within easy access for local employment areas. However, to maximise these benefits it is

essential that existing issues of congestion are reduced. Transport links to, and facilities at, existing industrial and employment areas may need to be improved in order to capitalise upon new development and an increased local employee catchment.

## 12.3 Topics

12.3.1 This section sets out the appraisal of the spatial approach option against the topics of the SA framework. The 'community and wellbeing' sub-section also incorporates equalities considerations. Table 20 summarises the significance of the expected impact.

**Table 20: Appraisal of areas of search and potential housing distributions against the SA framework topics**

Key											
	Positive impact (+)		Neutral impact / balance of positive and negative impacts (0)				Uncertain impact / insufficient information (?)		Negative impact (-)		
Option	Air	Biodiversity	Climate change	Community	Economy	Historic	Housing	Land	Landscape	Transport	Water
Areas of search and potential housing distributions	-	-	?	?	+	-	+	-	-	?	-

### Air

12.3.2 Although no AQMAs have been declared in the proposed development areas for this option, traffic emissions (particularly from the M11 and the A414) are identified as the most significant source of air pollution in Harlow and the proposed housing provision will likely lead to increased congestion across the district and a deterioration of air quality. In addition, construction and related activities during the development of new housing and associated infrastructure could lead to short-term effects on air quality.

12.3.3 However, the sites location close to existing employment areas and the rail network should provide opportunities for reducing the reliance of residents on the private car. Without intervention, the eastern development area is likely to be heavily car dependent and lead to increased emissions principally on the M11 and the connecting road network.

### Biodiversity and green infrastructure

12.3.4 Although nationally designated sites are outside the area of the proposed development areas it is likely that the eastern development will have an impact on wildlife sites to the east of Harlow. The northern development area could potentially impact on the Rye Meads SPA and Roydon Mead SSSI. It could also impact on the River Stort and its healthy population of otters. The two southern sites are located within the vicinity of a mixed woodland SSSI.

12.3.5 The option would also lead to the loss of a significant amount of open space, particularly to the east of Harlow. However, this would present opportunities for improved access to open spaces as well. There may also be significant opportunities, particularly with respect to the

development to the north and east of Harlow, to integrate green infrastructure into any proposed development schemes.

- 12.3.6 It is possible that green wedges, watercourses and other features in Harlow District – that could play a role as wildlife corridors and other linkages – may be disrupted by new development, particularly to the north and east under this spatial option.

### Climate change (mitigation and adaptation)

- 12.3.7 Development of this scale will ultimately result in increased greenhouse gas emissions; however, the scale of development in the north and east could provide realistic opportunities to implement sustainability measures to reduce per capita emissions in the medium to longer term. Waste to energy and renewable energy generation opportunities may be viable, particularly for the north and eastern growth areas which could capitalise on community ownership opportunities. The location of development to the north and east would also need to be supported by a comprehensive sustainable transport offer to provide a realistic alternative to private car ownership and use, particularly considering their close proximity to the A10 and M11 motorway.
- 12.3.8 The northern and eastern developments are proposed in proximity to areas classified as Flood Risk Zone 2 and 3. Measures are likely to be required to minimise the greater risk of surface water flooding due to increased development.
- 12.3.9 Climate change can impact on species dispersal and adaptation and new development could impact on buffering (e.g. maintaining wildlife corridors). This was also discussed under the biodiversity and green infrastructure topic.

### Community and wellbeing

- 12.3.10 The majority of development for this option is located in the north and east of Harlow. Reliance on existing community infrastructure such as schools, community centres and medical facilities in the northern development could risk coalescence with Sawbridgeworth and also dilute any sense of place and belonging in the new community, distancing it from Harlow in the public consciousness. Community facilities in Churchgate Street and Old Harlow may suffice in the short term to sustain the new eastern development with additions and extensions, but would need overhauling at some point in the future due to the substantial new development being proposed. This suggests a programme of phasing-in community facilities. New, universally accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.
- 12.3.11 Growth in the southern and western development areas would also need to be supported by new community facilities, given the limited connectivity of these areas to the town centre by public transport. Primary schools, sports grounds and leisure facilities at Sumners and Kingsmoor are deemed inadequate to support new development in isolation. The southern and western development areas would also be less connected to London, Cambridge, Stansted and the wider region than the northern and eastern areas, due to the absence of railway stations in their proximity. Continued reliance on existing public transport infrastructure towards the south and west of Harlow may result in people without cars being disadvantaged. Older people and people with low incomes are very likely to be socially excluded in this scenario. Disabled people, older people as well as others requiring care services may be adversely affected by the development areas' poor connectivity to the town centre or other neighbourhood centres.

- 12.3.12 Proposed development areas towards the south and west of Harlow contain two authorised Gypsy and Traveller sites. Unless these travelling communities are canvassed for engagement with the LDF process, and especially over new developments in close proximity to authorised pitches, these communities are likely to face social exclusion.
- 12.3.13 Given high obesity and diabetes figures for the district, any encouragement and provision for exercise and active recreation is likely to have a positive effect on human health. In this context, parks, woodlands and recreational areas included within development areas may play a part in alleviating health deprivation. Recreational activities are also likely to be beneficial to young people and may help to redress a high incidence of teenage pregnancy and low incidence of participating in physical activity.
- 12.3.14 Socio-economic profiles for the district's wards show homogeneity across the board with a predominant white population, with small pockets where other ethnicities live, such as parts of Little Parndon, Hare Street and Mark Hall. This implies that the existing communities are defined along ethnic and other cultural lines, which would pose a challenge to social cohesion and to civic participation by new residents in any area.
- 12.3.15 The southern and western proposed development areas include existing farming and agricultural activities. Balancing the natural attributes of the landscape with new housing, services and other urban opportunities, will be a challenge.

### **Economy and employment**

- 12.3.16 Development to the north and east should be well located in terms of access to the Templefields industrial estate and the development to the south-west should be well placed to capitalise on employment opportunities at the Pinnacles. Proximity of the northern development area to the rail network and the eastern growth area to the M11 provide excellent strategic transport opportunities for outward and inward commuting to employment provision in new growth areas, as well as provide the opportunity of critical mass to bring about opportunities to develop specific technical/scientific/research expertise in particular areas. Ensuring employment growth provides opportunities for the existing skill base as well as tailored towards new industries, whilst complementing existing employment will be a challenge.
- 12.3.17 The development to the south will have ease of access to employment areas at Staple Tye, and vice versa these businesses will have access to a larger resource pool. However, the developments will require significant land take including large tracts of agricultural land which may have negative consequences for those working in the industry.
- 12.3.18 The high levels of growth should provide an impetus and support additional services and facilities in the medium to long term and the housing growth should provide significant construction jobs in the shorter term.

### **Historic environment**

- 12.3.19 The areas identified for development include Schedule Ancient Monuments (SAMs), listed buildings, Conservation Areas (to the north, east and west) and Registered Parks and Gardens (to the east and west). Given the large scale of development there is likely that some of the town's historic fabric could experience negative impacts from development, either directly or indirectly through changes to landscape setting, for example.

- 12.3.20 The development areas to the north and east are likely to have most impact on the town's historic environment. In particular, increased traffic growth due to development could impact the Conservation Areas in the north-east of Harlow and also the clusters of listed buildings within these areas.

### Housing

- 12.3.21 The levels of proposed housing should provide good opportunities for high levels of affordable housing provision and help to reduce the cost of home ownership, improve the IMD for Housing and Barrier to Services and lower high levels of homelessness within the district. New build will provide greater opportunities to incorporate features more suited towards ageing and disabled residents.
- 12.3.22 It is not clear whether the smaller developments to the south and west will be large enough to justify new services and facilities, in particular improved public transport. If this is the case, the additional housing in this area could place greater pressures on existing services and new residents may be reliant upon personal transport.
- 12.3.23 The spatial option does not outline plans for gypsies and travellers pitches.

### Land

- 12.3.24 The majority of development would be delivered on grade 2 agricultural land comprising arable farmland, grassland and some woodland. This approach to development is in contrast to the emphasis towards prioritising development on PDL. Furthermore, the development is also likely to included areas of the metropolitan Green Belt.
- 12.3.25 The southern development site of 1,000 homes and the northern development of 4,000 homes could act as a barrier to views from the town centre by building in the line of sight through beyond the green wedges. This would impact the function of the green wedges as green corridors as well as the aesthetic appeal and the sense of community that these open green expanses provide.
- 12.3.26 Harlow has low rates of recycling but high rates of waste disposed at landfill. Positive impacts may be experience due to opportunities to improve recycling rates and bring forward innovative processing technologies such as waste-to-energy, particularly as part of the creation of large new communities e.g. to the north and east.

### Landscape

- 12.3.27 While the areas identified for development lie outside Special Landscape Areas the proposed scale of development will lead to significant negative effects. This will be particularly to the north, east and (to a lesser extent) south of Harlow where the Landscape Character has a high degree of sensitivity to substantial urban developments. The development to the east will be in an area which does not have a high degree of sensitivity to substantial urban development and therefore by placing a significant quantum of housing in this location may minimise impact that would otherwise be experienced in locations of higher landscape sensitivity.
- 12.3.28 Development to the north of Harlow could potentially lead to visual coalescence with Sawbridgeworth. There is also potential for development to conflict with the 'green wedge' design of Harlow and the landscape-led approach of the Gibberd masterplan. Additionally, the ridgeline to the south of Harlow provides a significant constraint on the scale of development.

## Transport

- 12.3.29 The significant scale of development close to Harlow Town and Harlow Mill rail stations present opportunities for increasing rail usage, however there are also existing capacity constraints on this rail line. In addition, the high concentrations of large-scale development will also require increased public bus transport to and from these areas.
- 12.3.30 Whilst development to the south and west is not in close proximity to rail stations, public bus services could provide access to these as well as the London underground train station in Epping; however existing concerns regarding public transport would need to be addressed to avoid worsening. It is unclear whether the scale of development to the south and west will be sufficient to facilitate necessary infrastructure and transport improvements.
- 12.3.31 The proximity of existing employment sites and opportunities for integrating green infrastructure within the design of new development will likely promote sustainable travel modes such as cycling and walking.
- 12.3.32 Although development of this scale will provide opportunities to facilitate a modal shift towards more sustainable forms of transport, the development's close proximity to the M11 particularly for the eastern and northern developments is highly likely to result in an increase in road traffic on what is already a heavily congested area. New road upgrades, for example a new northern distributor road, motorway junction and link road and bridge across the River Stort, could relieve congestion; however it would also further promote less sustainable transport patterns and work against some DaSTS objectives in facilitating modal shift.
- 12.3.33 The phasing of transport infrastructure will be critical in achieving modal shift over the long term and therefore must be fully put in place before residents move into the new growth areas.

## Water

- 12.3.34 Harlow is located in an area of severe water stress and has a daily domestic per capita consumption use which is significantly higher than the national average. Whilst there is identified capacity to provide water resources to meet planned growth to 2021 water resources in the study area are either over-abstracted or over-licensed. Therefore, the high levels of growth under this option would place additional pressure on existing water resources.
- 12.3.35 The large scale of development that is proposed according to this option would, however, facilitate the implementation of high water efficiency standards and the incorporation of SuDS, particularly through the design of sustainable urban extensions e.g. to the north and east. It would be important that development in the north takes into account and avoids any potential impact on the river Stort.
- 12.3.36 It should be noted that there are no significant differences between any of the spatial options in terms of their impacts against this topic.

## 12.4 How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?

- 12.4.1 From the appraisal of Areas of search and potential housing distributions the following table includes our mitigation recommendations. These are recommendations for the Council that

may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

SA framework	Mitigation recommendations
Town Centre	<ul style="list-style-type: none"> <li>To avoid losing the increased customer catchment to the north and to Lakeside and Bluewater, it would be important to ensure that the town centre has a substantial and attractive retail offer that can meet increased demand and that transport links to the Town Centre are adequate.</li> <li>Ensure that development is encouraged within Harlow Town North and seek opportunities with the train station and development of the Stort Valley.</li> </ul>
Eastern growth area	<ul style="list-style-type: none"> <li>There are opportunities for enhancements to accessibility, setting and biodiversity value for the local community and Harlow more widely.</li> <li>Open space should be enhanced where appropriate.</li> <li>Ensure new development in the eastern growth area is supported by sufficient community, employment and transport infrastructure and address concerns regarding congestion.</li> <li>Protect and complement the Conservation Areas and distinct settings of Churchgate Street and Old Harlow.</li> <li>Improving access from the northern developments to the rail network.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>Ensure adequate provision of facilities and services to meet demand, including e.g. health and education facilities.</li> <li>Protect and complement the Conservation Areas and distinct settings of Churchgate Street and Old Harlow.</li> <li>Ensure that development (and any new neighbourhoods or neighbourhood centres) does not impact upon the viability of neighbourhoods throughout the District or detract investment from the centre.</li> <li>Spread investment throughout the district in order to regenerate and generally improve the urban fabric and existing community infrastructure. This should assist existing neighbourhood centres to capitalise on new residents and ensure improved facilities for existing and new residents.</li> <li>Improvements to transport would be needed to facilitate movement throughout the district. Sustainable forms of transport and green infrastructure, including cycle and footpaths, should be promoted through the district to neighbourhood centres and linking to new development and employment opportunities.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>It is essential that existing issues of congestion are reduced and transport links are improved.</li> <li>Consider improving existing employment offer and transport links (e.g. sustainable transport links with residential areas) in order to capitalise upon development and to create a better working environment.</li> <li>If the creation of new employment sites in the growth areas, particularly to the north of Harlow, is necessary; careful planning and phasing.</li> </ul>
Air	<ul style="list-style-type: none"> <li>Strong supporting policies for train travel and other forms of sustainable travel that limit car reliance, particularly in the east. Improve links between residential areas and employment sites. Explore opportunities with the railway route, Epping underground station, National Cycle Route 1 and other green transport corridors.</li> <li>Appropriate controls must be put in place to ensure that air quality within the immediate area is not negatively affected during the construction of the new development and its associated infrastructure.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Direct impacts on sites with potentially high biodiversity value (e.g. County Wildlife Sites, an LNR, the Rye Meads SPA, the Roydon Mead SSSI, and the River Stort) and high quality open space, should be</li> </ul>

SA framework	Mitigation recommendations
	<p>avoided</p> <ul style="list-style-type: none"> <li>Enhance biodiversity and the quality and accessibility of open space e.g. by building green infrastructure and biodiversity-enhancement measures into development and by improving the habitat of the River Stort and Valley.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>Transport and strategic routes (road, rail, cycle and foot) requirements would need to meet the scale of development and seek to minimise unsustainable forms of transport.</li> <li>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.</li> <li>There is an opportunity on the flood plain to create green infrastructure and wetland habitat and to enhance the river Stort as a landscape feature for biodiversity value and for recreational value, without creating a physical barrier in Harlow.</li> <li>Explore the potential for low carbon initiatives including renewable energy generation (e.g. waste-to-energy), sustainable design and construction techniques and facilitating a transport modal shift, as a part of developing sustainable communities.</li> <li>Build flood mitigation features in to design such as SuDS and green infrastructure.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>New accessible river crossings may be needed to bring all residents of the new development area within access of Town Centre facilities and the Harlow Town railway station.</li> <li>Improve existing and provide new access to sustainable transport. The eastern development area would benefit from better public transport links into the town centre and other neighbourhood centre. The town centre should be at least as easy to get to as London or Cambridge for residents of this development area; if not there is a danger that the new dwellings proposed here would serve as a 'commuter belt' for other cities, contributing little to Harlow's civic life. Existing public transport links to the western development area are limited and must be reinforced through, for e.g. more buses plying the same routes, more bus stops and diversions to existing routes to service new developments.</li> <li>The use of agricultural land for housing development should be avoided if possible and the agricultural community should be brought into the debate. Further education, adult education and skills training programmes can be beneficial to help sections of the community currently living off the land, become better suited to the new employment and lifestyle opportunities that will be open to them in future.</li> <li>Levels of recreational provision should not be reduced by new development and look to ways to enhance recreational activities and to maintain, extend and enhance walking and cycling networks through areas of natural beauty.</li> <li>Invest in programmes of multicultural events to promote social cohesion between diverse and somewhat isolated communities and new population.</li> <li>Gypsy and Travellers need to be engaged in the LDF process, especially over new developments in close proximity to authorised pitches.</li> <li>The eastern development area in this spatial option must include community facilities, to avoid overtaxing existing facilities in Old Harlow and Churchgate Street.</li> <li>The eastern development area would benefit from better public transport links into the town centre and other neighbourhood centre. Existing public transport links to southern and western development should be reinforced e.g. more buses plying the same routes, more bus stops and diversions to existing routes to service new developments. Increase</li> </ul>

SA framework	Mitigation recommendations
	<p>connectivity between the different parts of Harlow and the proposed extensions.</p> <ul style="list-style-type: none"> <li>The northern developments in this spatial option must include community facilities, in order to make it a self sustained neighbourhood with an identity of its own. It would be suitable to roll out a phased programme of community facilities provision to service the eastern development area, starting from extensions to existing facilities and ending in new or overhauled facilities.</li> <li>Coalescence between development to the north of Harlow and existing settlements should be avoided where possible.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Capitalise on labour pool to the west for the Pinnacles and to the north and the east for Templefields and ensure adequate access and facilities at these locations.</li> <li>Growth to the north (and east) will need to include complementary (and not competing) employment opportunities so as not to detract from the regeneration of the town centre.</li> <li>Facilitate the delivery of supporting transport infrastructure and sustainable transport options e.g. from residential areas to employment areas and address issues of congestion. Explore the potential economic benefits of the rail line and Harlow Town and Harlow Mill rail stations.</li> <li>Provide employment opportunities and facilities to meet district-wide needs and the diversification of the economy.</li> <li>Invest in any new and existing employment areas to makes Harlow both a good place to live and work.</li> <li>Improve the skills and education of Harlow's residents.</li> <li>Avoid a negative impact on the agricultural economy.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>Development which may lead to direct negative effects on SAMs and Registered Parks and Gardens in the area, and Conservation Areas (particularly in the north east) and listed buildings (particularly to the north and east), should be avoided.</li> <li>Policies requiring the protection of Conservation Areas, listed buildings and SAMs should be produced.</li> <li>Look at opportunities to enhance historic assets and, where appropriate (i.e. where there is low likelihood of negative impact as a result of visitors), for residents to benefit from these assets.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Plans for gypsies and travellers pitches will need to be considered.</li> <li>Consider accessibility to services and facilities (e.g. through public transport or local provision) where public transport is poor and a smaller amount of development proposed (i.e. the south and west).</li> </ul>
Land	<ul style="list-style-type: none"> <li>A Green Belt review should be undertaken prior to approval of development.</li> <li>Policies for renewal and regeneration should be pursued and development on brownfield land within the district should be maximised where possible.</li> <li>An agricultural land survey could be undertaken to ensure that only the lowest quality land is brought forward for development.</li> <li>Opportunity to explore waste to energy initiatives and other reuse, recycling and waste schemes, particularly as part of urban extensions and new sustainable communities to the north and east.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Coalescence between north of Harlow and Sawbridgeworth and other surrounding settlements should be avoided.</li> <li>Although there is likely to be less pressure on SLAs located to the south and west of the district, negative impacts may be cumulatively minimised by splitting the growth and thus pressure between the four areas.</li> <li>Safeguarding policies for green wedges and the River Stort are expected</li> </ul>

SA framework	Mitigation recommendations
	<p>to be included in the Core Strategy.</p> <ul style="list-style-type: none"> <li>There is very little that can be suggested in terms of minimising the significant negative effects that are likely to occur from this development option on landscape character.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in, to ensure that good sustainable travel habits are formed.</li> <li>Development may require demand management measures and improvements to access routes to discourage additional congestion and minimise trip generation.</li> <li>Integrate sustainable transport modes to assist with access to development and employment sites.</li> </ul>
Water	<ul style="list-style-type: none"> <li>Strong policies are required to minimise water use and maximise water efficiency.</li> <li>The proposed development at Rye Meads STW will be an important additional consideration.</li> </ul>

## 13 What will be the situation with the plan (under the employment options)?

### 13.1 Introduction

13.1.1 This section appraises the employment options against the SA spatial areas and topics (the SA framework). The broad locations of current employment sites are illustrated in Figure 10 and the options are described in the box below, as taken from the Core Strategy Issues and Options document.

#### Employment

Areas of search to accommodate new employment will need to be identified. 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.

Figure 10: Broad locations of current employment sites in Harlow



13.1.2 Assumptions that were made in the appraisal of employment options are contained in section 2.3.23.

## 13.2 Spatial areas

13.2.1 This section sets out the appraisal of the employment options against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 21 summarises the significance of the expected impact.

**Table 21: Appraisal of employment options against the SA framework spatial areas**

Key						
	Positive impact (+)	Neutral impact / balance of positive and negative impacts (0)	Uncertain impact / insufficient information (?)			Negative impact (-)
Employment option / Topic	Option 1) "Within existing employment areas and those indicated in the Adopted Local Plan"	Option 2) "Within growth areas, part of which would be accommodated in adjoining districts"	Option 3) "The identification of new employment areas at appropriate locations"	Option 4) "The promotion of live-work units at appropriate locations"	Option 5) "A combination of these [above] approaches"	Option 6) "Within existing employment areas and within urban extensions"
Town Centre	0	-	+	+	+	0
Eastern growth area	?	+	?	?	?	?
Neighbourhoods	?	?	+	+	+	?
Industrial & employment areas	?	?	?	0	+	+

### Town Centre

13.2.2 Options 1, 3, 4 and (to a lesser extent) 5 and 6 are likely to have a direct positive impact on the town centre, particularly whereby Options 3 and 4 provide complementary provision to existing employment areas and services and are of a suitable scale to capitalise on smaller pockets of land available.

13.2.3 As a standalone option, Option 1 should help reinforce the respective employment area's particular functions and help consolidate and build specialist expertise in these areas. However, focussing solely on these areas could miss opportunities to benefit from a more appropriate balance of employment provisions tailored towards individual areas and needs. Option 1 may be limited by existing transport infrastructure given that proposed growth would increase congestion on the local road network potentially impacting productivity. Similarly, Option 6 (and 5) may in part result in the same issue, but also allows for traffic growth to be dissipated more widely across the Harlow area. Incorporating elements of Options 3 and 4, or, alternatively applying Option 2, could also help dissipate increased traffic growth; thus with careful planning Option 5 could offer the most balanced approach for the Town Centre.

13.2.4 At present, the town centre provides the shopping provision, civic, commercial and leisure functions for the town; however, it is poorly connected, its public realm is not particularly attractive and there is a limited night-time economy. Given the town centre's need for regeneration, suitable employment provision in the town centre, such as capitalising on the options presented by Option 3 and 4, could be specifically tailored to local needs and may also help achieve the critical mass needed to help kick-start a wider recovery. Increased town centre residential provision will also be an important factor to achieve wider regeneration goals, particularly in helping to develop a more welcoming public realm and boosting a providing a wider consumer base to support an evening economy.

13.2.5 Option 2 would likely compound the existing economic issues facing the town centre; however, the extent to which this is the case would be dependent on whether the proposed employment provision would incorporate any similar service provision that the town centre currently provides.

### Eastern growth area

13.2.6 Option 1: Locating employment provision within existing areas and those indicated within the Adopted Local Plan (which excludes the Eastern growth area) would result in limited employment provision located in this area; however, proposed employment sites north of Nortel Networks and Newhall would still be within easy reach of new developments and provide employment opportunities for new residents. Option 2 would result in employment provision within the Eastern Growth Area and being located closer to the M11 (compared to Option 1) may represent a more attractive location for businesses requiring easy access to the road network. Option 2 may also provide greater opportunities to integrate employment/housing provision and capitalise on building more sustainable communities locating employment within easy reach of residential areas. Option 6 could allow for sites both within the Eastern growth area and within reach to be developed to an advantage, but could result in impacts from uneven distribution of employment across other growth areas.

13.2.7 Option 3 would likely compete for employment provision otherwise earmarked for the Eastern growth area which may detract from the area's ability to provide a healthy balance of employment provision integrated within the housing delivery. Option 4 may or may not complement employment provision in this area; however, whereby it would be located to complement Option 2 it would provide increased flexibility as to the type, size and location of different employment options.

13.2.8 Option 5 represents a balance between the issues for Options 1 to 4 but further impacts could arise whereby employment allocation is unevenly distributed across the different growth areas.

### Neighbourhoods

13.2.9 Options 1, 2 and therefore 6, do not set out proposals to bolster employment and service provision in local neighbourhoods; however the location of employment areas in and around neighbourhoods should help support these areas both in terms of employment opportunities and additional services they may provide. Option 6 could spread employment support across the district's neighbourhoods and where needed, however it is unclear whether an even distribution of employment across the district in response to neighbourhood need would result.

13.2.10 Given the role and importance of neighbourhood centres is diminishing and that they often lose out to out-of-town retail parks and other sub-regional shopping centres, it will be important that any new employment/service provision away from these centres does not contribute to their

further demise. It is not possible to clearly identify whether Option 1 or 2 would significantly mitigate impacts on neighbourhood centres due to the limited spatial information provided within the Local Plan or draft Core Strategy.

- 13.2.11 Options 3, 4 and 5 provide the opportunity to locate new employment within existing local neighbourhoods and most significantly, the nature of the provision (envisaged to be of a smaller scale to Options 1, 2 and 6) could be better tailored to match individual local need and site criteria.

### Industrial and employment areas

- 13.2.12 The nature of the proposed employment provision is unclear, and therefore it is not possible to ascertain to what extent it could be accommodated within existing industrial and employment areas, particularly if it were dependent upon large warehousing facilities. However, employment provision in existing areas should help maximise efficient use of employment land and reduce pressures for land in other areas. Option 1 would inevitably lead to increased congestion on the local road network, particularly for development focused on sites to the north and west of Harlow away from M11 motorway intersection.
- 13.2.13 Option 2 should enable employment provision to be strategically located close to transport infrastructure to the east which may be particularly important for businesses requiring ease of access to the strategic road network; however, locating similar service offerings away from established centres could contribute to diluting expertise within these centres.
- 13.2.14 Option 3 may provide a better opportunity for accommodating employment areas in the most strategic locations to maximise benefit to both businesses and consumers. As for Option 2; however, this option could potentially dilute the expertise currently offered within existing industrial and employment areas.
- 13.2.15 Although the location and scale of live-work units (Option 4) is not clear at this stage, it is highly likely that the anticipated limited nature of their provision would have little impact on existing industrial and employment areas.
- 13.2.16 Option 5 (and to a lesser extent, Option 6) would provide a balance of impacts between those identified above.

## 13.3 Topics

- 13.3.1 This section sets out the appraisal of the employment options against the topics of the SA framework. Table 22 below summarises the significance of the expected impact.
- 13.3.2 The core strategy provides limited detail as to the nature location of employment provision and hence a detailed assessment at the sub-regional scale is difficult. Option 5 (and Option 6 to a more limited extent) is a balance of Options 1 to 4, could prove to be compatible with all the sustainability objectives if implemented in order to maximise compatible outcomes of each of the options. It should be noted that an effective appraisal of Option 3 could not be conducted due to no information being provided on the size, nature or location of the “new employment areas”.

**Table 22: Appraisal of employment options against the SA framework topics**

Employment option Topic	Option 1) “Within existing employment areas and those indicated in the Adopted Local Plan”	Option 2) “Within growth areas, part of which would be accommodated in adjoining districts”	Option 3) “The identification of new employment areas at appropriate locations”	Option 4) “The promotion of live-work units at appropriate locations”	Option 5) “A combination of these [above] approaches”	Option 6) “Within existing employment areas and within urban extensions”
Air	-	+	?	+	?	?
Biodiversity and green infrastructure	+	-	?	?	?	0
Climate change	?	+	?	+	?	?
Community and wellbeing	?	+	?	+	?	?
Economy and employment	?	?	?	+	?	?
Historic environment	+	?	?	?	?	?
Housing	-	+	?	?	?	0
Land	+	-	?	?	?	?
Landscape	+	-	?	?	?	?
Transport	-	?	?	+	?	?
Water	?	?	?	?	?	?

## Air

13.3.3 Although Harlow does not have an air quality issue regarding its existing industrial areas, it does identify emissions from vehicles as a main emissions source. Option 1 would likely result in increased emissions within Harlow Town Centre and along the main road network within the town. Locating employment away from Harlow Town Centre (Option 2 and possibly 3) should improve emissions levels within the town, particularly if matched to improved sustainable transport options for employees to reach new employment areas. Option 4 is likely to have minimal impact on emissions as the place of employment will be the same as the place of residence.

13.3.4 Options 5 and 6 would likely result in a decrease in emissions within Harlow town centre and increased emissions in the wider area (due to the growth in Option 2), unless realistic alternative sustainable transport choices are brought forward with proposed development.

## Biodiversity and green infrastructure

13.3.5 Locating employment provision within existing centres and on identified land to the east (Option 1), where it capitalises on the re-use of previously developed land and would set aside 40% of land for habitat creation, should help reduce impacts on biodiversity and green infrastructure. Whereby areas of green infrastructure are located within existing employment or proposed employment areas it should be given adequate protection to minimise impacts on local biodiversity. Locating employment land within the growth areas (Option 2) would, depending

on the extent of biodiversity and green infrastructure in the area, have different degrees of impacts. The majority of land earmarked for the different growth areas is predominantly agricultural land Grade 2 and hence locating employment within these areas would require greater land take and negatively impact on those areas. Thus Option 6 is likely to have an impact balanced between Options 1 and 2, potentially developing both PDL and greenfield. Option 3, depending on where the “appropriate locations” are, could also result in the loss of biodiversity in these areas. Option 4 is unlikely to have any significant impact on biodiversity but this would be dependent on the specific site.

- 13.3.6 The extent to which Option 5 (and also Option 6) would impact biodiversity and green infrastructure in and around Harlow is uncertain due to limited information being provided on the proposed mix of locations of employment provision, but could be offset by Options 3 and 4.

### Climate change (mitigation and adaptation)

- 13.3.7 Locating employment within existing employment areas and to the east of Harlow (Option 1) may result in increased GHG emissions compared to Option 2, which may provide more opportunities to locate employment closer to the strategic road network. Option 2 could also provide the opportunity to more closely integrate employment provision within proposed residential development areas providing opportunities for reducing commuting distances. Option 2 could also benefit from greater opportunities to incorporate SuDS within developments and help reduce the risks of surface water flooding that may not easily be accommodated in existing employment areas. However, there is an opportunity under Option 1 to upgrade and improve the fabric of existing sites e.g. by incorporating higher building standards. Option 6 is likely to have an impact balanced between Options 1 and 2.
- 13.3.8 It is unclear as to the impact of Option 4 on this climate change topic. Whereby employment areas are located close to requisite transport infrastructure (if required) and within easy reach of the necessary labour pool the impacts of employment growth could be largely mitigated. Option 4 is likely to be compatible with this topic - commuting distances are minimised and live-work units could be placed in close proximity to their target markets reducing transportation distances of goods.
- 13.3.9 Option 5 (and Option 6 to a lesser extent) is likely to present opportunities to balance the benefits of Options 1 to 4 depending on the proportion of their respective implementation.

### Community and wellbeing

- 13.3.10 Helping tackle pockets of deprivation within Harlow Town Centre may be best achieved by siting employment provision within existing areas and proposed areas to the east that can be easily accessed (Option 1). Given that replacement sports facilities will be provided before the appropriation of existing facilities north of Nortel Networks, Option 1 is unlikely to have significant impacts on the availability of sporting and recreational facilities. Locating employment within new growth areas could have a positive impact on employees who live within these areas and could provide greater opportunities for walking or cycling to work. Locating employment and housing within easier reach of the wider countryside should also provide opportunities for a better balanced and improved quality of life. Option 6 could therefore provide cumulatively a number of benefits, but this would depend upon the results of site selection and whether this will take in to account community and wellbeing needs.
- 13.3.11 Option 3 could potentially help local community and wellbeing by providing employment opportunities matched to the local skill base in areas of deprivation and most in need of job

growth. Whilst not constrained to particular areas, it could be tailored and made to fit based on local need. Similarly, Option 4 provides further options to facilitate opportunities of business growth tailored specifically to local business needs, skill sets and local market requirements.

- 13.3.12 At a masterplanning scale, Option 5 could deliver a comprehensive plan of employment options best suited to Harlow district enabling employment and housing growth to be brought forward such that it best matches the needs of the existing and future local communities.

### **Economy and employment**

- 13.3.13 Centrally located employment (Option 1) is likely to reinforce the local economy and may provide the critical mass of growth to attract further investment. This may help address the pockets of deprivation (depending on the nature of job opportunities) within the Town Centre and help improve local people's livelihoods. Locating development in growth areas (Option 2) or in new locations (Option 3), particularly if located within close proximity to good transport infrastructure, is unlikely to help in the regeneration of central Harlow or support existing employment areas. Option 6 could therefore result in cumulatively the better impacts by searching within both existing and potential urban extension areas. Option 4 would provide excellent opportunities to diversify current employment opportunities suitable for a variety of skills levels, and due to the likely limited number of the live-work units they are unlikely to compete with existing employment areas and provide excellent opportunities to complement existing provision with niche products, as required.

- 13.3.14 The key issue will be to facilitate employment opportunities to match the existing skill base as well as provide the right economic and geographical characteristics to make Harlow an attractive area for investment. The impacts of Option 5 (and to a lesser extent Option 6) would be a balance between Options 1 to 4 depending on the relative mix.

### **Historic environment**

- 13.3.15 Options 1 or 4 are unlikely to have any significant impacts on the historic environment. Development on the land north of Nortel Networks and Newhall could impact views from the town centre across the green wedge to the east; however, in general it is understood that the land to the east of Harlow has relatively low landscape value. The extent to which Option 2 would impact the historic environment in the growth areas is unclear as there is little indication of how employment development would be distributed. Option 6 could also have an impact but this would likely be smaller than that of Option 2 because it could also result in development in existing sites; however the limited detail of distribution also makes any scale of impact unclear. Similarly, it is unclear at this stage how Option 3 would impact the historic environment.

- 13.3.16 Options 5 would result in potentially positive impacts for the historic environment if employment provision is prioritised in existing employment area, however, were it to be located predominantly in growth areas the impact of Option 3 is uncertain.

### **Housing**

- 13.3.17 Increased housing provision and complementary service provision in Harlow Town Centre will be necessary to help the town's regeneration. New employment provision will be a key element; however, placing all employment provision within existing and proposed sites under the Local Plan (Option 1) may limit the opportunities for the wider regeneration agenda in terms of allocations for housing. In contrast, Option 2 would result in employment land being located in growth areas enabling more services to be located closer to the new communities which

could particularly benefit young families and the elderly. Option 6 – within existing employment areas and within urban extensions – should allow for a balance of these impacts.

- 13.3.18 It is unclear how employment provision, as proposed by Option 3, would affect housing provision if at all given that it would be located in new areas. Similarly, it is unclear how Option 4 would impact on Housing; however, provision of live-work environments may be suitable for particular residents who may have limited mobility or have specific needs that may be better accommodated in live-work units.
- 13.3.19 Option 5 would balance a combination of the issues identified above.

### Land

- 13.3.20 Option 1 is likely to be compatible with the need to ensure that housing delivery contributes to the regeneration of Harlow. Employment provision located within reach of existing residential areas should provide an impetus to the Town's regeneration and optimise development of PDL; this is unlikely to be achieved by locating employment in growth areas as for Option 2. Although Option 1 would require the relocation of recreation and sports facilities (displaced by employment land allocated to the north of Nortel Networks) to an area of land in the green wedge and that release of green field land is required to meet the Local Plan's requirement, it is still likely to have less impact than Options 2 or 3. Growth areas are, to varying degrees, to be developed on agricultural land; therefore if employment provision were also to be provided in these areas there would likely be an increase land take and further impacts on open space within Harlow and surrounding districts. Extending the search for new employment areas both within existing and new employment areas, should mean that Option 6 will have an impact balanced between Options 1 and 2; with the impact reduced assuming criteria taking in to account land use would be applied when selecting appropriate sites.
- 13.3.21 The wording of Option 3 would imply that the new employment areas would be located outside existing employment areas and it could therefore be assumed they would most likely be located on green field. The impact of the Option 3 approach is therefore likely to have a greater impact on the character of the District compared to Option 1 or 2. The number and scale of live-work units (Option 4) are unlikely to have a significant impact on land within the district. Therefore Option 5 (a combination of all approaches) could potentially have an impact similar to, or (given the inclusion of Option 3) slightly more negative than, Option 6.

### Landscape

- 13.3.22 The landscape to the east of Harlow is considered the least sensitive within the District and it is unlikely that employment provision north of Nortel Networks and Newhall would impact on Harlow's landscape setting (Option 1). Whereby Option 2 proposes employment in the line of the slight ridge running from the South of Harlow up towards the Stort Valley this could impact on landscape setting in the area. It is unclear as to the impacts of Options 3 or 4 on the landscape character in Harlow due to no spatial information being presented for these Options, however there is therefore potential for Option 3 (and 2) to impact on Special Landscape Areas and communities outside of Harlow, unless landscape criteria to avoid this were employed for the search and site selection process. Under which circumstances, Options 5 and 6 would be likely to have an impact balanced between Options 1 and 2.

## Transport

- 13.3.23 Option 1 is likely to compound existing road transport issues within Harlow, particularly on the A414 towards the A10 and M11 motorway. The extent to which more sustainable forms of transport could be implemented to reduce private car commuting is uncertain; however such measures providing more effective servicing of the existing centres would mitigate to some degree the expected increased traffic within the town, if growth were to be located here. Option 2 would likely relieve traffic congestion in the Town Centre in the cases where growth areas are located close to the existing and new road network and rail services. However, whereby new employment provision is not served by improved sustainable transport options, it may exacerbate reliance on the need for private car ownership and ultimately lead to greater road congestion in the District. By searching within both locations, Option 6 would potentially face the same problems as Options 1 and 2, unless search criteria taking into account transport would allow for these challenges to be overcome by identifying the most appropriate locations across the wider search area.
- 13.3.24 It is unclear to what extent Option 3 would contribute to either greater congestion on the road network or whether this Option could allow employment areas to be strategically located to maximise use of existing public transport infrastructure and potentially justify new provision. Option 4 is likely to have a minor positive impact on the transport infrastructure within Harlow and help meet the objective to increase the number of home workers and reduce the number of people commuting to work.
- 13.3.25 Splitting employment provision between the four options (Option 5) could impact on the deliverability of new sustainable transport infrastructure if employment areas are ultimately not large enough to provide the necessary critical mass to justify new infrastructure.

## Water

- 13.3.26 Option 2 and possibly Option 3 should provide greater opportunities to incorporate SuDS and other water saving and water quality enhancing measures that may not be so easy to incorporate into existing employment areas such as for Option 1. However, in the case whereby Option 2 and 3 would result in employment land being located near existing water courses, this could result in increased risk of contamination. Option 4 is unlikely to have any significant impact on water in the District. Given the wider search area for Options 5 and 6, this could allow for the mitigation of water impacts, assuming that appropriate criteria were used in the employment area selection process.

## 13.4 How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?

- 13.4.1 The level of detail provided in the draft Core Strategy and lack of clarity over the exact nature of the options (in particular Options 3 and 5), including whether they are to be treated as mutually exclusive or not, means that providing effective mitigation / enhanced effects is accordingly difficult.
- 13.4.2 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.

- 13.4.3 It is not clear to what extent either of the Options 3 and 4 would impact on land take or biodiversity through change of land use; however, 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, which will help helping reduce impacts on climate change through reduced emission 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.
- 13.4.4 One of the major limitations to the appraisal is not knowing the exact spatial distribution. Given the wider search area for Options 5 and 6 (to a lesser extent), this could allow for the mitigation of a number 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 selection process.

## 14 What will be the situation with the plan (under the developing policy options)?

### 14.1 Introduction

14.1.1 This section appraises the developing policy options against the SA spatial areas and topics (the SA framework). The options are described in Table 5, Chapter 3.

### 14.2 Spatial areas

14.2.1 This section sets out the appraisal of developing policy options against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 23 summarises the significance of the expected impact.

**Table 23: Appraisal of the developing policy options against the SA framework spatial areas**

Key						
Positive impact (+)		Neutral impact / balance of positive and negative impacts (0)		Uncertain impact / insufficient information (?)		Negative impact (-)
Developing policy option	Placeshaping		Housing	Prosperity	Infrastructure	Lifestyles
	Spatial areas					
Town Centre	+	?	+	?	?	
Eastern growth area	+	+	+	+	+	
Neighbourhoods	+	+	+	+	+	
Industrial and employment areas	?	0	+	?	?	

#### Town Centre

14.2.2 Generally speaking, the policy areas contained under the five themes should have a positive impact against the Town Centre especially Placeshaping policies in terms of regeneration, creating accessible, safe and attractive public places in an area where connectivity and physical appearance and loss of retail can be issues. The Prosperity theme policies should assist in addressing the falling number of jobs in the Town Centre. There are low levels of housing in the Town Centre and levels of additional provision are unclear at this point, but the Town Centre should benefit from the Housing theme. In terms of the Infrastructure theme, although the policies should have a beneficial impact on the Town Centre, it might be useful to clarify town centre regeneration policies and to refer specifically to the accessibility to, and 'arrival point' of, the Town Centre (identified in the Scoping Report as having a number of design problems). In addition, the evening and night-time economy in the Town Centre is

considered to be poor and focused at younger persons, and it would be important for the Lifestyles policies to consider the Town Centre and to direct leisure and recreation opportunities to where they are needed most and to ensure that they are accessible to all residents.

### Eastern growth area

- 14.2.3 Generally speaking, the policies under the five themes should have a positive impact against the Eastern growth area. Particularly there are several positive impacts from the Placeshaping theme policy areas. Improving accessibility is important to this area and its residents and it would be important to ensure that Newhall becomes both an established new community and a connected and integrated part of Harlow and that existing settlements maintain their identity as part of Placeshaping. Biodiversity loss is an issue in this area and enhancement should be considered in Placeshaping policies.

### Neighbourhoods

- 14.2.4 The themes and policy areas generally should have a positive impact on Neighbourhoods. As with the other spatial areas, it will be important to maximise biodiversity gain in addition to a healthy living environment in the neighbourhoods through design. The Scoping Report identified an issue with loss of the hierarchy of retail centres in Harlow and also the outmigration of residents to other areas for retail and other services; the Prosperity theme should reinforce the hierarchy and also protect and reinforce neighbourhood centres. It would be important that the policies under the Lifestyles theme include provision of leisure and recreation opportunities that is both adequate and accessible to all residents across Harlow, reflecting areas of need and the profiles of the different neighbourhoods.

### Industrial and employment areas

- 14.2.5 Although Placeshaping theme policies should have a positive impact on this spatial area, it is unclear whether the policy areas acknowledge the importance of the working environment in addition to the living environment. Creating an attractive environment to both live and work in could be a consideration for the Core Strategy, particularly under policy areas for regeneration and design under this theme. For example, the policy area to protect green space under the Lifestyles theme could be used to promote a healthier working environment. The policies under the Placeshaping and Infrastructure themes are also important in terms of providing connectivity and therefore in reducing unsustainable travel to employment areas. It is also important to protect and where possible enhance biodiversity in industrial and employment areas, not just at designated sites, but also on brownfield land and other sites.
- 14.2.6 Policies under the Prosperity theme should have a positive impact on this spatial area, however, there could be a more specific reference to industrial and employment areas within this theme, in order to target issues specifically relevant to these areas.

## 14.3 Topics

- 14.3.1 This section sets out the appraisal of the developing policy options against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 24 summarises the significance of the expected impact.

**Table 24: Appraisal of the developing policy options against the SA framework topics**

Key							
Positive impact (+)		Neutral impact / balance of positive and negative impacts (0)		Uncertain impact / insufficient information (?)		Negative impact (-)	
Developing policy option	Placeshaping	Housing	Prosperity	Infrastructure	Lifestyles		
Topic							
Air	+	?	-	?	+		
Biodiversity and green infrastructure	+	?	?	?	+		
Climate change	+	?	-	?	?		
Community and wellbeing	+	+	+	+	+		
Economy and employment	+	?	+	+	0		
Historic environment	+	?	?	?	?		
Housing	+	+	?	+	0		
Land	+	?	-	?	?		
Landscape	+	?	?	?	?		
Transport	?	?	?	?	?		
Water	?	?	?	?	?		

## Air

- 14.3.2 Placeshaping theme policies should have a cumulative positive impact on air quality especially as they look to create and enhance footpaths, encourage the use of more sustainable forms of travel, promote growth in sustainable locations and advocate best practice design.
- 14.3.3 It would be important that policies for the regeneration of existing development and neighbourhoods incorporates where appropriate sustainable design principles such as energy saving upgrades. Other considerations that would have a beneficial impact on air quality include district heating schemes and housing and street design to minimise residential reliance on cars.
- 14.3.4 On balance, it is likely that policies under the Prosperity theme could have a negative impact on air quality, given that they enhance transport links and promote Harlow as an employment, retail and leisure location; thus increasing traffic within Harlow which is the main contributor to emissions. However, improved transport links offers an opportunity to ease congestion, particularly in areas that could potentially become AQMAs within Harlow.
- 14.3.5 The Infrastructure theme policies on balance should have a positive effect by enhancing public transport and cycleway links and addressing traffic congestion. However, policies to make appropriate provision for car parking in development and to encourage 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.

- 14.3.6 Lifestyles theme policies enhancing the range and accessibility of leisure and recreational opportunities within Harlow should discourage travel and thus have a beneficial impact on air quality.

### **Biodiversity and green infrastructure**

- 14.3.7 On balance, policies under the Prosperity theme should have a positive impact on biodiversity and green infrastructure. However, development on brownfield land should consider any biodiversity present onsite, and urban regeneration, enhancement of public spaces and existing footpath and cycleway links, and best practice design and the use of SuDs, should all consider where biodiversity gains can be made. Criteria to guide the sustainable location of development under the Prosperity theme should consider biodiversity.
- 14.3.8 The amount of housing, including gypsies and travellers pitches, needed in Harlow is likely to have a negative impact overall on biodiversity, although a lot will depend upon the policy for strategic direction and location of growth, particularly in terms of green infrastructure. The Housing theme policies could go some way towards mitigating impact by considering biodiversity on site location basis and in policies to improve the quality of homes and regenerate existing neighbourhoods in the district.
- 14.3.9 The impact of the Prosperity theme policies on biodiversity and green infrastructure is uncertain. Provision of employment sites and growth opportunities in research and development could have a negative impact, however policies to secure environmental improvements around neighbourhood centres and improve the public realm could mitigate for this by considering the importance of green infrastructure and biodiversity enhancement. This should also secure additional benefits in terms of the working environment.
- 14.3.10 Infrastructure provision could have a negative impact on biodiversity, although this is unclear at present, and biodiversity and green infrastructure should be a consideration in any criteria. In particular, this theme could benefit from including green infrastructure. By providing public spaces and protecting and enhancing allotments and green spaces, policies under the Lifestyles theme should have a positive impact on green infrastructure and, to a lesser extent, biodiversity. However, the location of facilities would need to be a consideration.
- 14.3.11 It is possible that green wedges, watercourses and other features in Harlow District play a role as wildlife corridors and other wildlife linkages. These spaces are also important in terms of buffering species against climate change e.g. in terms of dispersal and adaptation. This should be positively reflected under the Placeshaping theme – its objectives to protect and enhance environmental assets including green wedges, and policy areas to define create, protect and link between green spaces and networks – and through green space policy areas in the Infrastructure and Lifestyle themes. However, the policy area under the Placeshaping theme could be altered to reflect this.

### **Climate change (mitigation and adaptation)**

- 14.3.12 The Placeshaping theme policies should have significant positive impacts against this topic, with policies that will encourage sustainable travel, promote growth in sustainable locations to include avoiding development in areas of flood risk and the support of flood retention initiatives, and policies encouraging best practice in building design that will promote energy conservation.

Careful planning on SuDS and building design can have additional benefits such as flood risk mitigation, creation of a more attractive living and working environment, biodiversity gain and community health and wellbeing.

- 14.3.13 The level of housing needed for Harlow will increase emissions and the location and delivery of this housing will also be crucial in terms of emissions. For this reason it is unclear at this stage the impact of the Housing theme policies, although they should have a positive mitigation effect e.g. by providing enough housing to meet needs, by building to established and strict design standards and criteria under policies within Placeshaping. Other considerations for this theme include considerate construction, locational criteria such as flood risk, and the mix of housing tenure which will have an impact upon energy use per dwelling.
- 14.3.14 Policies under the Infrastructure theme that tackle congestion and promote public transport should mitigate emissions to an extent. Proposals for the Rye Meads STW are something that should be a consideration for the Core Strategy, possibly under the Infrastructure theme.

### Community and wellbeing

- 14.3.15 Policies under the five themes should contribute to an overall positive impact on community and wellbeing, and it would be important to maximise the benefits for the residents of Harlow through these policies as much as possible. Numerous policies promoting green space, cycling and walking, and infrastructure policies to expand health facilities, should address poor health within Harlow district. Considerations for the policy areas include creating an environment that is both good to live and work in, which should help to tackle issues of outmigration, particularly of young skilled workers. It is important to pay attention to the different ward and community profiles of Harlow, seeking to meet neighbourhood needs and specific challenges. For example, policies under the Lifestyles and Infrastructure themes should seek to provide community facilities and uses where they are needed and where they are accessible to all, seeking to minimise any inequalities within Harlow district. Issues raised in the Scoping Report include higher levels of violent crime in the District than nationally and the high proportion of residents who think being attacked because of the colour of their skin, ethnicity or religion is a very big or fairly big problem. 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, for example in policies to develop and regenerate the Town Centre, Neighbourhoods and public realm.

### Economy and employment

- 14.3.16 All policies contained under the themes should contribute to making Harlow a more attractive place to both live and work. The Housing theme policies should provide key worker housing as a part of affordable housing and the location of this housing close to areas of employment is an issue for consideration, although this is not currently detailed within the policy areas text. Many of the policies support good transport links, particularly public transport under the Infrastructure theme. Although the Prosperity theme includes a policy area to enhance transport linkages and other infrastructure to support business development, it is important that the policies within the Infrastructure, Housing and Employment themes support good transport links and accessibility for residents to the areas of employment. The Prosperity and Infrastructure themes contain policy areas that should benefit towards issues that include reducing education and skills deprivation and the high number of in-commuters that occupy high income jobs in Harlow. Pockets of deprivation within Harlow for employment, income and education, require

targeted policies. Policies that address neighbourhood centres and the identification and regeneration of priority areas, as outlined under the Prosperity and Housing themes, should assist in addressing deprivation; consider the importance of employment, education and skills and the creation of an attractive working environment. The improvement of existing employment and industrial locations could be addressed under the Prosperity theme e.g. in terms of accessibility, building design and employee facilities, and more generally the working environment. Research and development industry encouragement under the Prosperity theme is important to address the lack of skilled jobs, although this needs to be accompanied by appropriate training and educational facilities as alluded to under the Infrastructure theme and should be emphasised.

### Historic environment

- 14.3.17 Although policies under the Prosperity theme are anticipated to have an overall positive impact on the historic environment topic by safeguarding assets, there is potential for policies contained under the Placeshaping, Prosperity and Infrastructure themes to cumulatively increase pressure on historical assets. It is important to balance making historical assets accessible for the enjoyment of all residents and visitors, with controlling any potential negative impacts from increased visitor pressure and increased levels of traffic within the district. It is also unclear at this stage whether the location of development policies contained under the Housing, Employment, Infrastructure and Lifestyles themes will have a negative impact on historical assets. This will need to be considered as part of a suite of criteria and any potential impacts will need to be avoided or mitigated. The availability of historical assets in Harlow could be a consideration in policies under the Lifestyles theme to provide and enhance cultural opportunities as a potential resource but one that would need careful management. The policy area under the Placeshaping theme that acknowledges the design principles established by Gibberd, is important in protecting the historical significance of Harlow's masterplan as a unique former new town.

### Housing

- 14.3.18 The Placeshaping theme policies should have a positive impact on housing by secure by design and crime prevention measures within new development, promoting development on brownfield land, avoiding development in flood risk areas and promoting mixed use. Regeneration of the town centre (where there is some housing but the area is considered to be somewhat run-down), neighbourhood centres and priority estates policy area should consider housing needs, and assist in addressing pockets of housing deprivation particularly in the west of Harlow and also levels of urban decay. The Housing theme policy areas should have positive impacts against this topic, by addressing key issues to include a sufficient supply of affordable housing, given the number of households on the housing register, and low levels of affordability. However, a new policy area to be considered under the Housing theme relevant to ensuring an adequate supply of land for house building is one that guides the development of a Site Allocations or Area Action Plan DPD for urban extensions to Harlow.
- 14.3.19 According to the Scoping Report, the private rented sector is small and expensive in Harlow, and there is scope to address this under the Housing theme. Homelessness in Harlow is also an issue that may require consideration under the Housing theme. Affordability is a particular issue in Harlow that requires a sufficient level of housing provision, however the town was originally designed for 60,000 and careful planning including appropriate phasing and supporting infrastructure, facilities and services is essential. Phasing is therefore important for housing, although mention of this under the Housing theme is limited to infrastructure, and

there is also scope to mention the importance of meeting local and community needs under Harlow's design of distinct neighbourhoods. For this reason the Infrastructure theme is expected to have positive impact for housing. The Prosperity theme is similarly expected to have positive impacts for housing by focusing on neighbourhood centres and upgrades to the public realm. The link between residential and employment and educational areas could be considered under this theme, and the Infrastructure theme should also have a positive impact in this respect. The balance and distribution of new employment and housing will be an issue of concern that will need to be addressed in more detail at a later stage of the LDF process.

## Land

- 14.3.20 Policies contained under the Prosperity and Lifestyles themes should have a positive impact against this topic. However, the Infrastructure theme could benefit by mentioning green infrastructure.
- 14.3.21 The Prosperity theme policies should have particular significant benefits against this topic by including policy areas that promote growth in sustainable locations, including promoting the development of previously brownfield land and at other appropriate locations within the town, the definition of the extent of Green Belt and the promotion of mixed use development. As is the case with policies under the Placeshaping and Housing themes, the Prosperity, Infrastructure and Lifestyles themes could include policy areas that seek development on brownfield land where appropriate. Although the additional housing required for Harlow will have an impact on land, location and delivery will be crucial, and the Housing theme will need to set out more detailed measures and criteria under its policy areas regarding this, such as considering the Green Belt, environmental and historical assets, green space and small amounts of high quality agricultural land on the periphery of the district, amongst other factors and looking to applying higher density requirements at appropriate locations in the District (in addition to a blanket minimum density requirement).. By including policy areas on building on PDL, regenerating existing residential areas and if the Council included applying higher density requirements at appropriate locations in the District (as suggested above) to increase quality and supply, the Housing theme could minimise land impact to some extent. However, there is also scope to include policy areas to improve (as identified in the Scoping Report) Harlow's low levels of reuse, recycling, composting and anaerobic digestion (AD); that additional housing in particular will contribute towards. This is similarly the case for development delivered under the Prosperity, Lifestyles and Infrastructure themes. Policies securing economic growth under the Prosperity theme in particular may be anticipated to have negative effects in terms of additional land use and the generation of additional waste; the recycling of waste at offices could be a consideration for this theme. Considerate construction and the disposal of construction waste could also be considered for the delivery of new development e.g. housing, employment, facilities and services, and infrastructure.

## Landscape

- 14.3.22 Several Placeshaping theme policies should have a positive impact on this topic, in particular those that aim to protect and enhance the setting of the River Stort and other significant landscape features, and also by defining and protecting the network of green spaces in the district and acknowledging the design principles established by Gibberd. It is important that policy areas to develop Harlow under all the themes are in line with the Gibberd's vision for the town in the masterplan and that development takes in to account, and is sympathetic to, the physical and visual links from the town centre to the surrounding countryside, including the pronounced north-facing ridge slope to the south of the town. Development must be set within

the landscape context of Harlow and considered within criteria for location and design of development in policy areas under the Housing, Prosperity, Infrastructure and Lifestyles themes. Policy areas encouraging the preferential development of brownfield land under the Placeshaping and Housing themes could consider the landscape value of these sites and how it may be enhanced.

## Transport

- 14.3.23 The Infrastructure theme policies will be crucial for the delivery of sustainable transport, and more generally in addressing the issue of growth in a town already beyond the original masterplan design capacity, and the need to upgrade and enhance infrastructure, including strategic road and rail links.
- 14.3.24 The importance of Harlow's strategic location could be an additional consideration under the Placeshaping theme, and thus the importance and role of transport routes into and within the district. According to the Scoping Report, strategic linkages are currently inadequate and this may have repercussions for Placeshaping. For example, links to and between the neighbourhood centres and to the town centre, and policy areas seeking to secure regeneration. The town centre suffers from transport-related issues such as poor signage and pedestrian accessibility, and the train station could be used to a greater advantage – opportunities to unlock this potential via development of Town Centre North could be referred to and emphasised within the Core Strategy. To an extent this is captured under the Prosperity theme and could be emulated within the Placeshaping theme. In particular, policy areas under the strategic objective to enhance competitiveness should generally have a positive impact by recognising the importance of linkages and the role of Harlow as a gateway to Europe, but uncertainties exist given that transport will need to be a key consideration for this and for further detail at a later stage of the LDF development process.
- 14.3.25 The policy area under the Placeshaping theme that sets out criteria for the most sustainable locations should consider the accessibility and transport credentials of locations. Transport infrastructure is included under the Infrastructure theme, however this could similarly be a consideration under Placeshaping theme policies. Similarly, the Housing theme should consider transport along with strategic direction and general location of growth, as should the selection of additional employment sites and the enhancement of existing sites under the Prosperity theme, new infrastructure under the Infrastructure theme, and additional provision under the Lifestyles theme. However, the Prosperity theme should have a positive impact through the inclusion of a policy area enhancing transport linkages and other infrastructure to support business development. Accessibility for all residents to facilities and services under these themes will be an important consideration. The Infrastructure theme in particular is important for accessibility, and generally should have a positive impact in this respect against the sustainability topic of transport, particularly through measures to enhance public transport and transport linkages. It is important that these linkages are enhanced district-wide for the different neighbourhoods and residential areas.
- 14.3.26 Although the Housing theme includes a policy area requiring that infrastructure provision keeps pace with house completions, it may be beneficial to emphasise in particular the importance of transport infrastructure during phasing and ensuring that congestion does not occur on completion of development. Similarly, although the Prosperity theme considers the need for transport linkages to support business development, the issue of congestion and minimising unsustainable transport for employment, leisure and retail, could be emphasised under this theme.

## Water

- 14.3.27 Harlow is located in an area of extreme water stress and is expecting a large amount of growth. All the themes include a policy area that supports growth and new development and, as such, will need to consider the conservation of water resources. Policy areas under the Placeshaping and Housing themes should have a positive impact by supporting best practice design, which should include water conservation measures and, where possible, water neutrality should be an aim. The use of SuDS is also mentioned in terms of flood risk, although their use for water conservation could also be considered. The Placeshaping theme has a policy for the setting of the River Stort, and the enhancement of water quality in this river could be considered.
- 14.3.28 Additional employment, retail and leisure facilities under the Prosperity and Leisure themes could also consider the importance of water conservation and best practice design e.g. in office blocks and leisure facilities. Although the Prosperity theme includes a policy area enhancing 'other' infrastructure to support business development, the extent to which this considers water infrastructure will presumably be elaborated upon at a later stage of the LDF development process. Similarly, the Infrastructure theme does not specifically outline water provision, and it will be important that infrastructure does not have a negative impact on water resources e.g. in terms of consumption and pollution. The Rye Meads STW may require mention in policy areas under the Infrastructure theme.

## 14.4 How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?

- 14.4.1 From the appraisal of the developing policy areas the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

### Mitigation recommendations

SA framework	Mitigation recommendations
Town Centre	<ul style="list-style-type: none"> <li>Maximising the currently poor levels of biodiversity in the Town Centre, e.g. through design measures and where policy seeks to develop brownfield sites where biodiversity could be present.</li> <li>Refer specifically to the accessibility to and 'arrival point' of, the Town Centre in town centre regeneration policies.</li> <li>Its important for the Lifestyles policies to consider the Town Centre – in order to improve night-time economy and to ensure that activities are not only directed to younger persons - by directing leisure and recreation opportunities to where they are most needed and to ensure that they are accessible to all residents.</li> </ul>
Eastern growth area	<ul style="list-style-type: none"> <li>To ensure that Newhall becomes both an established new community and a connected and integrated part of Harlow and that existing settlements maintain their identity as part of Placeshaping policies.</li> <li>Biodiversity loss is an issue in this area and enhancement should be considered as part of Placeshaping policy areas.</li> </ul>
Neighbourhoods	<ul style="list-style-type: none"> <li>To maximise biodiversity gain in addition to a healthy living environment in the neighbourhoods through design.</li> <li>Should reinforce the hierarchy and also protect and reinforce</li> </ul>

SA framework	Mitigation recommendations
	<p>neighbourhood centres under the Prosperity theme.</p> <ul style="list-style-type: none"> <li>Lifestyles theme policies should include provision of leisure and recreation opportunities that is both adequate and accessible to all residents across Harlow, reflecting areas of need and the profiles of the different neighbourhoods.</li> </ul>
Industrial and employment areas	<ul style="list-style-type: none"> <li>Need to acknowledge the importance of the working environment in addition to the living environment in Placeshaping and Lifestyles themed policies</li> <li>Important to protect and where possible enhance biodiversity in industrial and employment areas, not just at designated sites, but also on brownfield and other sites.</li> <li>There could be a more specific reference to industrial and employment areas within the Prosperity theme, in order to target issues specifically relevant to these areas.</li> </ul>
Air	<ul style="list-style-type: none"> <li>Important that policies for the regeneration of existing development and neighbourhoods incorporate where appropriate sustainable design principles such as energy efficiency upgrades.</li> <li>Other considerations that would have a beneficial impact on air quality include district heating schemes and housing and street design to minimise residential reliance on cars.</li> <li>Improved transport links offers an opportunity to ease congestion, particularly in areas that could potentially become AQMAs within Harlow.</li> <li>Car schemes, street design and good <i>public</i> transport corridors should also be considered.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Development on brownfield land should consider any biodiversity present onsite, and urban regeneration, enhancement of public spaces and existing footpath and cycleway links, and best practice design and the use of SuDs, should all consider where biodiversity gains can be made.</li> <li>Criteria to guide the sustainable location of development for policies under the Prosperity theme should consider biodiversity.</li> <li>Biodiversity and green infrastructure should be a consideration in determining the strategic direction and general location of growth for Harlow.</li> <li>Housing theme policies should consider biodiversity on a site location basis and in policies to improve the quality of homes and regenerate existing neighbourhoods in the district</li> <li>Include policies that consider the importance of green infrastructure and biodiversity enhancement to secure environmental improvements around neighbourhood centres and improve the public realm. This will also secure additional benefits in terms of the working environment.</li> <li>Biodiversity and green infrastructure should be included in any criteria for the consideration of Infrastructure provision. In particular, this theme could also benefit from including green infrastructure.</li> <li>Consider biodiversity and green infrastructure in determining the location of public spaces, allotments and green spaces.</li> </ul>
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> <li>Careful planning on SuDS and building design for Placeshaping policies can have additional benefits such as flood risk mitigation, creation of a more attractive living and working environment, biodiversity gain and community health and wellbeing.</li> <li>Other considerations for Housing theme policies include considerate construction, locational criteria such as flood risk, and the mix of housing tenure which will have an impact upon energy use per dwelling. Also linking to Prosperity theme policies.</li> <li>Apply high quality design and construction standards and locational requirements to all new buildings linking policies under the Prosperity, Infrastructure and Leisure themes.</li> </ul>

SA framework	Mitigation recommendations
	<ul style="list-style-type: none"> <li>The proposed development at Rye Meads STW will be an important additional consideration, possibly under the Infrastructure theme.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>Policy areas should consider creating an environment that is both good to live and work in.</li> <li>Policies should pay attention to the different ward and community profiles of Harlow, seeking to meet neighbourhood needs and specific challenges e.g. policies under the Lifestyles and Infrastructure themes should seek to provide community facilities and uses where they are needed and where they are accessible to all, seeking to minimise any inequalities within Harlow district.</li> <li>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, e.g. in policies to develop and regenerate the Town Centre, Neighbourhoods and public realm.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Housing theme policies should look to provide key worker housing as a part of affordable housing and locate this housing close to areas of employment.</li> <li>Important that the policies within the Infrastructure, Housing and Employment themes support good transport links and accessibility for residents to employment areas.</li> <li>Pockets of deprivation within Harlow for employment, income and education, require targeted policies.</li> <li>The improvement of existing employment and industrial areas could be addressed under the Prosperity theme e.g. in terms of accessibility, building design and employee facilities, and more generally the working environment.</li> <li>Provide more emphasis on appropriate training and educational facilities as alluded to under the Infrastructure theme to support the policy that seeks to facilitate research and development opportunities under the Prosperity theme.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>There is the potential for policies under the Housing, Employment, Infrastructure and Lifestyles themes to have negative impacts on historical assets. These should be considered as part of a suite of criteria and any potential impacts will need to be avoided or mitigated.</li> <li>Lifestyle theme policies could provide avenues to enhance cultural opportunities as a potential resource, but this would also require careful management and planning of existing historical assets.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>The private rented sector is small and expensive in Harlow, and there is scope to address this in policies under the Housing theme.</li> <li>Homelessness in Harlow is also an issue that should be considered in policies under the Housing theme.</li> <li>Careful planning including appropriate phasing and supporting infrastructure, facilities and services is essential for development in Harlow.</li> <li>Phasing is an important issue that should be mentioned in policies under the Housing and Infrastructure themes or linkages made.</li> <li>Include a policy that guides the development of a Site Allocations or Area Action Plan DPD for urban extensions to Harlow.</li> <li>A link should be made between residential and employment and educational areas in policies under the Prosperity theme.</li> <li>The balance and distribution of new employment and housing will be an issue of concern that will need to be addressed in more detail at a later stage of the LDF process.</li> </ul>
Land	<ul style="list-style-type: none"> <li>Policies under the Infrastructure theme could benefit by mentioning</li> </ul>

SA framework	Mitigation recommendations
	<p>green infrastructure.</p> <ul style="list-style-type: none"> <li>• Policies under the Housing theme will need to set out more detailed measures under its policy areas in regard to considering the Green Belt, environmental and historical assets, green space and small amounts of high quality agricultural land on the periphery of the district, amongst other factors and also look to applying higher density requirements at appropriate locations in the District (in addition to a blanket minimum density requirement).</li> <li>• There is scope to include policy areas to improve (as identified in the Scoping Report) Harlow's low levels of reuse, recycling, composting and anaerobic digestion (AD); that additional housing in particular will contribute towards.</li> <li>• Considerate construction and the disposal of construction waste should also be considered for the delivery of new development e.g. housing, employment, facilities and services, and infrastructure.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Policies should be in line with the Gibberd's vision for the town in the masterplan.</li> <li>• Development must take into account, and should be sympathetic to, the physical and visual links from the town centre to the surrounding countryside, including the pronounced north-facing ridge slope to the south of the town.</li> <li>• Development must be set within the landscape context of Harlow and considered within criteria for location and design of development in policy areas under the Housing, Prosperity, Infrastructure and Lifestyles themes.</li> <li>• Policy areas encouraging the preferential development of brownfield land under the Placeshaping and Housing themes should consider the landscape value of these sites and how it may be enhanced.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Infrastructure theme policies will be crucial for sustainable transport, and more generally in addressing the issue of growth in a town already beyond the original masterplan design capacity, and the need to upgrade and enhance infrastructure, and strategic road links.</li> <li>• Transport should be a considered under the Infrastructure and Placeshaping themes.</li> <li>• The Housing theme policies should consider transport along with strategic direction and general location of growth, as should the selection of additional employment sites and the enhancement of existing sites under the Prosperity theme, new infrastructure under the Infrastructure theme, and additional provision under the Lifestyles theme.</li> <li>• It may be beneficial to emphasise in particular the importance of transport infrastructure during phasing and ensuring that congestion does not occur on completion of development in the Housing theme policy area requiring that infrastructure provision keeps pace with house completions.</li> <li>• Although the Prosperity theme considers the need for transport linkages to support business development, the issue of congestion and minimising unsustainable transport for employment, leisure and retail, could be emphasised in policies under this theme.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Strong policies are required to minimise water use and maximise water efficiency. Water neutrality should also be an aim of such policies.</li> <li>• The use of SuDS is also mentioned in terms of flood risk, although their use for water conservation and biodiversity enhancement could also be considered.</li> <li>• Consider the enhancement of water quality for the River Stort.</li> <li>• Consider the importance of water conservation and best practice design e.g. in office blocks and leisure facilities in additional employment, retail and leisure facilities under the Prosperity and Leisure themes.</li> </ul>

SA framework	Mitigation recommendations
	<ul style="list-style-type: none"><li data-bbox="641 405 1466 483">• Include further detail on water infrastructure under the policy area enhancing 'other' infrastructure to support business development within the Prosperity theme.</li><li data-bbox="641 488 1466 566">• It will be important that infrastructure does not have a negative impact on water resources e.g. in terms of consumption and pollution. The Rye Meads STW should be mentioned Infrastructure theme policies.</li></ul>

## 15 Conclusions

### 15.1 Introduction

15.1.1 This chapter aims to bring together the main findings of the SA. It is difficult to provide a meaningful conclusion on Issues and Options documents because whilst the primary drivers of negative effects have been identified, the appropriate safeguarding policies have not yet been developed. These will emerge at a later stage in the plan making process.

### 15.2 Developing principles to direct growth

15.2.1 The Core Strategy asks for feedback on a number of issues affecting the location of new development in the District. The Council asks for feedback on what principles should direct growth ensuring that the Council's overarching regeneration and Sustainability goals are achieved. However, no details are given, at this stage, on the specific criteria that will direct new development which has restricted the appraisal in this area.

15.2.2 The Council also asks for feedback on a range of options for accommodating new development across the District including:

1. looking at all opportunities within the 'urban area boundary';
2. examining the role and function of other land such as underused land, open spaces and Green Wedges;
3. considering what opportunities exist to increase density in certain parts of the town; and
4. and the role of other initiatives including the redevelopment of the Town Centre North.

15.2.3 At this stage the Council is only presenting the various issues for the community to comment on and does not present any detailed options. Until more information is given about the nature of the proposals it is difficult to appraise this element of the Core Strategy. This is not uncommon for an Issues and Options document.

### 15.3 Spatial Options

15.3.1 Table 25 sets out a consideration of cumulative effects in terms of spatial options against each of the spatial areas and topics.

15.3.2 There are a number of uncertainties regarding the impact of the spatial options against the SA framework. This is mainly due as a result of 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 against the climate change SA topic. In addition, undertaking specific measures to plan for a sustainable community could result in positive impacts towards community wellbeing.

15.3.3 Similarly, greater detail on the exact nature of development within Harlow’s ‘urban area boundary’ will be required to understand the combined impacts of development in and around Harlow. In particular, the impact on the neighbourhoods spatial area is unclear in terms of whether new neighbourhood centres and/or hatches will be required, and whether growth areas will therefore increase pressure on existing neighbourhoods either from relying heavily on, or from competing with and detracting investment from, existing 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.

15.3.4 Given the landscape setting of Harlow and town design of distinct green wedges, combined with the fact that all spatial options have to consider growth areas that direct growth outwards, there will likely be a negative impact upon landscape. Similarly, negative impacts against other aspects of the environment – e.g. air, biodiversity and green infrastructure, historic assets, land and water – are expected for all options both directly, from construction of development and associated infrastructure (in the short-term) and indirectly, through pressures from an increased resident population. However, policies for intelligent construction and design can incorporate measures to mitigate and enhance where appropriate, including in the existing urban fabric of Harlow. Policies can also encourage sustainable transport options that should mitigate some of the long-term indirect and pressure-related impacts, unless increasing visitor pressure on environment assets. This should also mitigate impacts on air quality which are inevitable given the level of growth and associated increases in emissions from transport and construction.

**Table 25: Summary comparison of the spatial options performance against the SA framework**

Spatial option / Topic	Option A: RSS Northern Led	Option B: Policy Led 2	Option C: Combined Criteria led	Option D: Regeneration led	Option E: Sustainable Transport led	Areas of search and potential housing distributions
Town Centre	+	+	?	+	+	0
Eastern growth area	-	-	-	-	-	-
Neighbourhoods	?	?	?	?	?	?
Industrial and employment areas	?	+	?	+	?	+
Air	-	-	-	-	-	-
Biodiversity and green infrastructure	?	-	-	-	-	-
Climate change	?	?	?	?	?	?
Community and wellbeing	?	?	?	?	?	?
Economy and employment	?	+	?	+	+	+
Historic environment	-	-	-	-	-	-

Spatial option Topic	Option A: RSS Northern Led	Option B: Policy Led 2	Option C: Combined Criteria led	Option D: Regeneration led	Option E: Sustainable Transport led	Areas of search and potential housing distributions
Housing	?	+	?	?	+	+
Land	?	-	-	-	-	-
Landscape	-	-	-	-	?	?
Transport	-	-	?	?	-	?
Water	-	-	-	-	-	-

### Option A – RSS: Northern Led

- 15.3.5 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 of 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.
- 15.3.6 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.
- 15.3.7 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, thus 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.
- 15.3.8 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.

- 15.3.9 Given the smaller amount of development in the eastern growth area, 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

- 15.3.10 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 Harlow as 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.
- 15.3.11 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 topics, and also phasing of infrastructure delivery will 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.
- 15.3.12 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

- 15.3.13 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.
- 15.3.14 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, SSSIs – particularly to the south and Local Nature Reserves), open space and historic assets (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.

- 15.3.15 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).
- 15.3.16 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.
- 15.3.17 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.
- 15.3.18 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. Phasing of all infrastructure delivery will be important.

### Option D - Regeneration led

- 15.3.19 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 weighted to the north and south.
- 15.3.20 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 the agricultural community – particularly to the south – should be avoided if possible.

- 15.3.21 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 quantum is placed. However, it offers opportunities to enhance open space and protect the distinct settings of Church Langley, Old Harlow and development planned for Newhall.
- 15.3.22 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 minimise flooding from the Stort.
- 15.3.23 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 phasing of delivery will be essential. Improvements to transport would be needed to facilitate movement throughout the district in order to minimise congestion, the immobilisation and isolation of communities and 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

- 15.3.24 In addition to mitigation measures common with the other spatial options, the type and necessity of mitigation for the transport led approach 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.
- 15.3.25 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 outmigration.
- 15.3.26 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).

- 15.3.27 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 communities outside of Harlow.
- 15.3.28 The impacts of placing development to the east have been discussed under the criteria led approach.

### Area of search and potential housing

- 15.3.29 Similar to the policy led approach option, 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 Policy led approach B in terms of spreading growth, with some key differences.
- 15.3.30 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 and belonging. 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.
- 15.3.31 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.

### Comparison of spatial options

- 15.3.32 Except for the criteria led approach, 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 the Policy-led approach 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 the criteria-led approach may miss out on the potential to develop a new community to the north of Harlow.

- 15.3.33 Within and to the east of Harlow there is scope to place a significant quantum of housing. The policy led approach A (and to a lesser extent the regeneration led approach) 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.
- 15.3.34 There are concerns that 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 the criteria led, 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.
- 15.3.35 Spreading growth across the fringes of Harlow, for example policy led approach B, the regeneration led approach 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.
- 15.3.36 Creating a new or a number of new sustainable communities and urban extensions presents an exciting opportunity for all the options. The most appropriate location for such a community is an over-riding factor that this appraisal cannot answer, and the scale of development required at a location to make a new neighbourhood viable is unknown. 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.

15.3.37 Overall, the high levels of growth should enhance Harlow's role as a 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.

15.3.38 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 under the East of England plan.

## 15.4 Employment options

15.4.1 Table 26 sets out a consideration of cumulative effects in terms of employment options against each of the spatial areas and topics.

**Table 26: Summary of employment options performance against the SA framework topics**

Employment option Topic	Option 1) "Within existing employment areas and those indicated in the Adopted Local Plan"	Option 2) "Within growth areas, part of which would be accommodated in adjoining districts"	Option 3) "The identification of new employment areas at appropriate locations"	Option 4) "The promotion of live-work units at appropriate locations"	Option 5) "A combination of these [above] approaches"	Option 6) "Within existing employment areas and within urban extensions"
Town Centre	0	-	+	+	+	0
Eastern growth area	?	+	?	?	?	?
Neighbourhoods	?	?	+	+	+	?
Industrial & employment areas	?	?	?	0	+	+
Air	-	+	?	+	?	?
Biodiversity and green infrastructure	+	-	?	?	?	0
Climate change	?	+	?	+	?	?
Community and	?	+	?	+	?	?

Employment option Topic	Option 1) “Within existing employment areas and those indicated in the Adopted Local Plan”	Option 2) “Within growth areas, part of which would be accommodated in adjoining districts”	Option 3) “The identification of new employment areas at appropriate locations”	Option 4) “The promotion of live-work units at appropriate locations”	Option 5) “A combination of these [above] approaches”	Option 6) “Within existing employment areas and within urban extensions”
wellbeing						
Economy and employment	?	?	?	+	?	?
Historic environment	+	?	?	?	?	?
Housing	-	+	?	?	?	0
Land	+	-	?	?	?	?
Landscape	+	-	?	?	?	?
Transport	-	?	?	+	?	?
Water	?	?	?	?	?	?

15.4.2 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.

15.4.3 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.

15.4.4 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 the unknown 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 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.

- 15.4.5 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.

## 15.5 Developing policy areas

- 15.5.1 Table 27 sets out a summary of identified impacts in terms of proposed policy areas against each of the spatial areas and topics.

**Table 27: Summary of the developing policy options performance against the SA framework topics**

Developing policy option / Spatial area / topic	Placeshaping	Housing	Prosperity	Infrastructure	Lifestyles
Town Centre	+	?	+	?	?
Eastern growth area	+	+	+	+	+
Neighbourhoods	+	+	+	+	+
Industrial and employment areas	?	0	+	?	?
Air	+	?	-	?	+
Biodiversity and green infrastructure	+	?	?	?	+
Climate change	+	?	-	?	?
Community and wellbeing	+	+	+	+	+
Economy and employment	+	?	+	+	0
Historic environment	+	?	?	?	?
Housing	+	+	?	+	0
Land	+	?	-	?	?
Landscape	+	?	?	?	?
Transport	?	?	?	?	?
Water	?	?	?	?	?

- 15.5.2 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.
- 15.5.3 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.
- 15.5.4 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.
- 15.5.5 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.
- 15.5.6 The specific needs of different spatial areas within Harlow – e.g. employment areas, town centre, neighbourhoods etc. – could be further outlined within the context for policies 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.
- 15.5.7 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.

15.5.8 Mitigation recommendations are presented in section 13.4 and include:

- highlighting considerations for the development of more detailed policy content as policies are further developed;
- providing linkages between policy areas contained under different themes;
- identifying specific references that should be included in policies;
- proposing new policy areas for consideration; and
- suggesting changes to existing policy areas.

## 15.6 How best can we monitor the plan's impacts?

15.6.1 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.

15.6.2 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.

15.6.3 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.

## 16 Next Steps

### 16.1 Consultation

- 16.1.1 To enable the community and other stakeholders 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.
- 16.1.2 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. Following an independent examination by a planning inspector of the submitted document.