



Latton Priory, Harlow

Harlow Local Development Plan Examination

Response to Matter 3



Boyer

Report Control

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1. MATTER 3 OVERALL STRATEGY; HARLOW & GILSTON GARDEN TOWN – GENERAL PRINCIPLES & INFRASTRUCTURE

- 1.1 This statement has been prepared by Boyer on behalf of CEG and Hallam Land Management, in response to the Inspector's questions set for Matter 3, which relate to the Harlow & Gilston Garden Town.
- 1.2 CEG and Hallam Land are the promoters of Latton Priory, which is proposed for allocation through draft policy HGT1: "*Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town*", within the submission version of the Epping Forest Local Plan.
- 1.3 Whilst this proposed allocation is entirely contained within the administrative boundary of Epping Forest, it immediately adjoins the southern built edge of Harlow. The proposed allocation also constitutes an integral part of the Harlow & Gilston Garden Town project. As such, there are clear-boundary considerations and a corresponding requirement for a consistency of approach across both the Harlow and Epping Forest Plans.
- 1.4 Representations were previously submitted to the Harlow Development Plan Regulation 19 Consultation and it is noted that many of the questions set by the Inspector are for the Council to address. However, as promoters of the proposed Latton Priory Garden Town allocation, we have been engaged in detailed discussions with Council officers in relation to the strategic masterplanning process and other matters. This engagement has occurred through a number of structured meetings which have been held over the last few months.
- 1.5 Accordingly, we consider it appropriate to respond to a limited number of the identified questions, where we have relevant information and evidence to assist the Inspector and the Council.

Question 3.1: Is the overall spatial vision and spatial development strategy for Harlow to form the focus of the Harlow and Gilston Garden Town well considered, justified and would it be effective? Have alternative options for development in the HMA been considered that would not involve Green Belt land on the periphery of Harlow?

- 1.6 The proposed spatial approach rightly seeks to concentrate growth in and around Harlow. The administrative boundary of Harlow District Council is largely defined by the existing urban extent of the town, such that there are no realistic opportunities to distribute growth to other locales within the District. More significantly, the town constitutes *the* main settlement within the Housing Market Area and lies at the centre of a commuting zone for adjoining authorities (as identified in the SHMA). The settlement also plays a key role within the West Essex and East Herts Functional Economic Market Area (FEMA), particularly as a centre for inward investment and business growth. Strong functional relationships therefore exist between Harlow and the other HMA authorities. These relationships clearly point to the potential to achieve sustainable development at Harlow, through holistically planned growth.

- 1.7 The delivery of major development on sites adjacent to Harlow, achieved via the overarching framework provided by the Garden Town proposal, has also been proposed in order to facilitate key regeneration objectives. Indeed, in identifying Harlow as a focus for growth within the HMA, the Plan responds to the well-documented opportunities and challenges that face the town, as have been recognised by the HMA authorities. These particularly concern the need to achieve regeneration and investment, and the potential to capitalise on the economic and sustainability potential of this major settlement, with its two main line railway stations and proximity to the M11¹.
- 1.8 The Local Plan Sustainability Appraisal (May 2018), at Section 6 of that document, provides a detailed analysis of reasonable alternatives. The Sustainability Appraisal confirms that, at the HMA level, a clear process was followed in order to establish the preferred spatial approach and evaluate (and subsequently discount) other options. Six options were considered by the 'Co-operation for Sustainable Development Member Board'.
- 1.9 A Memorandum of Understanding was subsequently concluded between the HMA authorities to establish the distribution of housing between them. The preferred strategy was further supported by transport modelling, a Habitats Regulation Assessment (HRA) and a Strategic Site Assessment. These documents (and their subsequent updates) further evaluated the Harlow & Gilston Garden Town strategy, both holistically and with reference to specific sites.
- 1.10 Furthermore, it is also the case that Harlow District Council (together with Epping Forest, and East Hertfordshire District Councils) has been awarded Garden Town status, for the Harlow and Gilston Garden Town, as confirmed by the former Department for Communities and Local Government (DCLG), in January 2017. The proposed spatial strategy is therefore in accordance with a key Government initiative, which is also being supported with significant public sector funding streams that are intended to facilitate delivery.
- 1.11 In view of the above, it is highly unlikely that an alternative spatial strategy could contribute (as successfully) towards sustainable patterns of development, in accordance with the NPPF (2012) at paragraph 84. The principle of directing growth to the Garden Town Communities is therefore regarded as positive, justified and consistent with the strategic framework provided by the HMA and the Garden Town initiative.

Question 3.3 Is Policy HGT1 consistent with the equivalent or complementary policies for the Garden Town in the East Hertfordshire and Epping Forest local plans? If there are significant inconsistencies, how can these be resolved?

- 1.12 As indicated in our response to the Regulation 19 Consultation, it is recommended that the wording of Policy HGT1 be revised, in order to achieve greater consistency with Policy SP4 of the submission version of the Epping Forest Local Plan. Whilst it is recognised that the proposed Latton Priory allocation is located entirely within the administrative boundary of

¹ We refer the Inspector to paragraph's 4.19 to 4.38 of our response to the Regulation 19 Consultation. This provides extensive consideration of the principle of achieving major growth at Harlow.

Epping Forest District, it is nevertheless the case that the Strategic Masterplans (for each of the Garden Town areas) are to be developed with cross-boundary input from Harlow District Council. Accordingly, there is a practical case for ensuring a high degree of consistency between the respective Local Plans. We refer the Inspector to the comments presented at paragraphs 4.6 to 4.30 of our Regulation 19 representations, wherein detailed commentary concerning the composition of Policy HGT1 is provided.

Question 3.7 Have the overall infrastructure requirements for the overall Garden Town, including the transport effects, been adequately assessed? What transport improvements would be required, and how would these be delivered? How does the development relate to the new M11 Junction 7a?

- 1.13 Yes, the overall infrastructure requirements have been considered. The Local Plan is supplemented by an Infrastructure Development Plan (IDP). Additionally, a specific Harlow & Gilston Garden Town Infrastructure Delivery Plan (HGGT IDP) is being finalised. This will set out further details concerning shared infrastructure requirements. It is also notable that Essex County Council continues to engage with the Garden Town LPAs on matters pertaining to health, highways and transport, education, employment and flood risk.
- 1.14 In relation to M11 Junction 7, we understand that the HGGT IDP is reviewing the question of which Garden Town areas will need to contribute to the M11 J7 improvements. The document will consider also the apportionment of costs between them. It is our understanding that this emerging IDP work shall consider the apportionment of the cost associated with the M11 Junction 7 upgrades, between the Latton Priory and Water Lane sites. However, at the time of writing, the workstream is still in progress.

Question 3.8 Are the infrastructure requirements listed in Policy SIR1 necessary and justified? How would they be delivered? Would there be any adverse impacts?

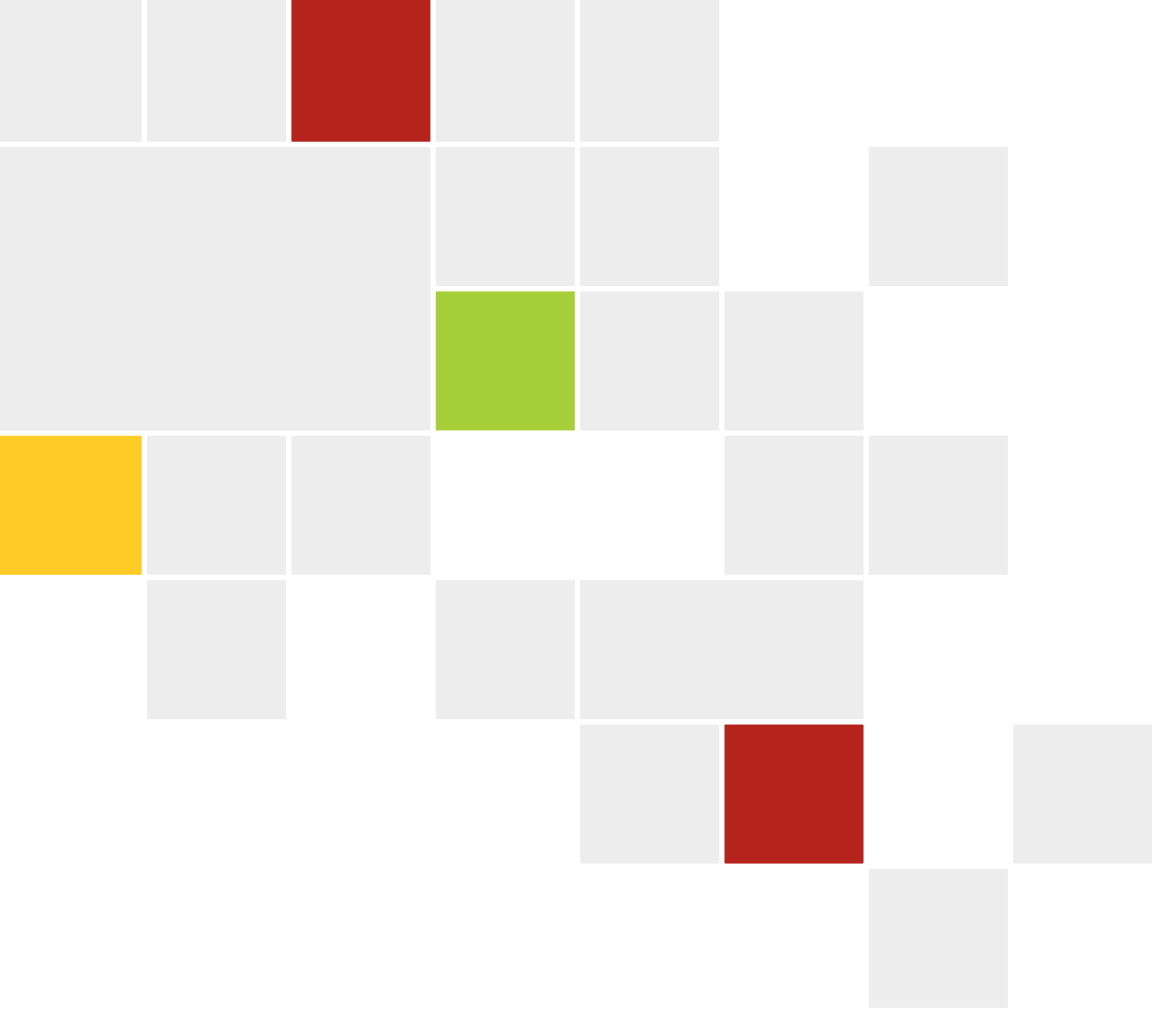
- 1.15 The proposed North-South Sustainable Transport Corridor (STC), will link Gilston to the proposed Latton Priory allocation. The deliverability of the STCs, including a north / south STC at Latton Priory, is currently being assessed by the Council. However, there are still matters to define at this point in time, particularly regarding specification, cost, funding, timing and route alignment. Consultants SYSTRA, Jacobs and Arup are working on respective supporting elements of the STC study. These includes costing, analysis of land assembly requirements, evaluating the level of modal shift that the STC will enable, the design of the proposed hubs and matters relating to route alignment.
- 1.16 The promoters of Latton Priory fully support the development of a North-South STC and consider that this is desirable to maximise the sustainability and regeneration gains that the Garden Town proposals aspire to achieve. It should nevertheless be noted that the North-South STC is not an essential or pre-requisite requirement for the development of Latton Priory to come forward. This situation occurs because the proposed allocation can be supported by other, sustainable, north-south connections. These include;

- On-site provision of walking and cycling routes, which will connect the housing areas with local facilities proposed within the development, as part of a comprehensive network;
- Off-site improvements to walking and cycling facilities with connections to the existing network including a high quality link to Harlow town centre and station (incorporating a network of Public Rights of Way that pass through a corridor of green open space linking through to the town centre). This will cater for employment, retail, education and leisure based trips;
- Providing public transport access to initial development phases by extending the existing bus routes to penetrate the site such that any future dwellings are a minimum of 40m from a bus stop; and,
- At a development threshold (to be defined) the development could support the provision of a new dedicated bus service into and through the site (bus operator Tellings-Golden Miller has been consulted on this strategy and has confirmed support for the proposals).

1.17 Separately, whilst Policy SIR1 makes no reference to such, it is further noted that the proposed Latton Priory allocation includes an area which is envisaged to be brought forward as Sustainable Alternative Natural Greenspace (SANG).

1.18 This matter is raised because of potential cross-boundary implications, which may affect the Garden Town as a whole. In this respect, it is noted that the provision of additional “strategic” SANG at Latton Priory (as a form of Green Infrastructure), may provide an opportunity to mitigate the potential impacts on the Epping Forest Special Area of Conservation (SAC). This provision is posited as a possible mitigation solution, which may be activated in the eventuality that it is considered that the Garden Town proposals (or part thereof) would give rise to ‘significant effects’, which have the potential to compromise the integrity of the designated site.

1.19 Whilst it is acknowledged that no formal mitigation strategy has yet been agreed, it is the case the ‘Interim Mitigation Strategy for the Epping Forest Special Area of Conservation’ clearly points to the likely role of SANG within the emerging mitigative approach. It is therefore important to acknowledge the capacity of Latton Priory to provide mitigation, which addresses ecological impacts potentially arising from the development of that proposed allocation, as well as effects that may potential arise from other Garden Town areas.



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