

# Harlow Local Development Plan – New household projections consultation, September 2020: Consultation responses

*Note: The Environment Agency and Historic England sent emails to say they do not have any comments to make.*

The responses are organised by date of order received.

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## **1. Harlow Alliance Party (Nicholas Taylor)**

*By email, 17/9/20*

From the outset the Harlow Alliance Party took the view that the councils in Harlow, East Herts and Epping Forest should have combined their efforts to produce one single Plan for the area now known as Harlow and Gilston Garden Town. They could then have consulted residents across the three Districts at the same time and in the same way. The outcome of not doing that has resulted in mixed messages being given to residents, conflicting views about infrastructure requirements for an enlarged town and each taking action in the meantime for the benefit of their own district at the expense of the others.

Taking a look again at points 1.15, 1.16 and 2.15 in the Harlow Local Development Plan Pre-submission Publication 2018 it is clear that since then many things have changed which will materially affect the councils ability to meet the objectives set (which we believe are questionable anyway). The latest ONS statistics on household numbers required is but the latest.

The 2018 figures in the ONS report for the three districts forming the Harlow and Gilston Garden Town continue a downward trend seen in earlier years. These are not just small percentages but ones which cannot be ignored and there is no evidence to suggest that this downward trend will not continue. Harlow Council have already built in a considerable uplift in the number of new homes compared to what is actually required. The information now available from the ONS suggests that the Council's target is even greater than is needed. The huge increase in the population of the UK in recent years has largely been due to inward migration from outside of the UK, which in turn has led to a shortage of homes in London, forcing families to look to the suburbs and beyond. With the implementation of a points based immigration system, the net immigration numbers are likely to reduce, which in years to come (during the life time of this Plan) will in turn reduce yet again the number of new households being created.

The loss of Green Belt and public open spaces occurs only once. We were pleased that you (the Planning Inspector) acknowledged the importance of so many of the open spaces which Harlow Council planned to build on and deleted these as part of your Main Modifications to the Local Plan.

We have noted that the inspectorate are questioning and rejecting other Local Plans around the country that are overestimating the housing needs against the out of date 2014 ONS figures and therefore excessively eating into Green Belt land. The viability of transport

Infrastructure becomes doubtful when the number of homes contributing to the infrastructure levy is reduced, the outcome of which can already be seen.

Other changes have taken place since Harlow Council published their submission:

Large out of town centre food shops have been given Planning Permission in areas which were originally intended for DIY and furnishings. These have free parking and easy access. The consequence of this change means that attempts to attract more shoppers and investment into Harlow Town Centre will become even more difficult to achieve.

Planning permission has been given for more office conversions in the town centre and for new flat blocks in addition to those permitted development office conversions to flats. Whilst the combination of all these will lead to more people living in the town centre, this can hardly be called regeneration and their construction leaves even less space in which to provide a bigger choice of shops and new leisure facilities.

The covid crisis has also led to a huge increase in on-line shopping and perhaps more importantly the increase in home working. As things stand, we are afraid that any hope of the town centre being the "go to" shopping centre is already being lost. Epping Forest DC is going ahead with their own plans to regenerate Epping, with new shops, a cinema and new leisure centre. The building of new roads leading south from Harlow contained in the Epping Forest DC Local Plan throws serious doubt on Harlow DC's aim of getting new residents living on Harlow's borders to visit Harlow's town centre and also throws into doubt the cost effectiveness of the transport strategy for Harlow.

In conclusion, more housing in and beyond Harlow's borders is not the answer to the problems which face the town, indeed, if the Plans of those who form The Harlow and Gilston Garden Town go ahead as they stand then we believe that at the end of the Plan period the town will be in a no better shape than it is now. The town will be ringed by homes not within Harlow, it's green belt will be lost and any need for more new homes will have to be built on sites such as those rejected by Harlow's Planning Inspector.

## **2. Ian Watson and Audrey Stillwell**

*By letter, received 16/9/20*

Thank you for your letter regarding the new household projection on the Harlow local development plan.

After viewing the report we have to agree that with the council "the 2018-based projections do not represent a meaningful change in the housing situation" and that no adjustment is needed. The Council's concern over such a need, therefore, to release Green Belt land is justifiable and correct.

## **3. John Graham**

*By email, 15/9/20 and 18/9/20*

*Email #1, 15/9/20:*

I understand from your letter of 9th September which I received on the 10th September that the Council does not consider that the housing requirements 9,200 does not need to be adjusted nor does the council consider this affects the justification for the need to release Green Belt land. The Council's decision that they do not need to change anything is purely based on speculative reasoning about trends and they are arguing that population growth in Harlow will produce more retail activity in the town whereas all the facts and current developments in the country show that it

won't. People may live in Harlow but they will choose to shop elsewhere. Harlow will become a dormitory town, a dead centre round which are circulating satellites who will develop their own attractions.

I should like hard copies of the report which you are going to submit to the inspector and look forward to his decision on whether your statement is evidence based and whether a meaningful change in the housing situation has occurred.

Housing is not the answer and the future of Harlow depends on getting the right provision for a rebirth of this landscaped town.

*A hard copy of the report, as requested, was sent to Mr Graham.*

*Email #2, 18/9/20:*

Further to my email of 15th September I want to thank you for sending the council's response to the Inspector.

The recent information from Nicholas Taylor of the Alliance Party gives reports that Epping Forest District Council is going ahead with their own plans to regenerate their town with new cinema, shops and new leisure centre. This pattern with the new satellites around Harlow building their own attractions confirms the BBC4 programme on Tuesday 15th September under the title Build, Build, Build when the investigators found that all the investment in the more than 50 new garden towns was for road construction to housing estates which would be dependent on car ownership. In connection with Winchester they could not get the government or the council to take part in the programme. The Government's hope that High Streets will be regenerated by the large sums they are prepared to make available was therefore completely unrealistic. Increase in population will not produce retail activity.

I understand that Harlow council have agreed to put their development proposals in front of an Independent Quality Review Panel and perhaps you would confirm when this is going to happen and that there will be an opportunity to put forward the vision for an ambitious shopping and cultural development as a regional attraction comparable with a visit to London.

Without such a development Harlow Town Centre will not attract. Housing is not the answer. Harlow deserves a rebirth.

#### **4. Natural England (Sharon Jenkins)**

*By email, 23/9/20*

Thank you for your consultation request on the above dated and received by Natural England on 9th September, 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Natural England does not consider that this Development plan poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.**

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments

that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

## **5. Home Builders Federation (Mark Behrendt)**

*By email, 23/9/20*

The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

On the whole we support the approach taken by the Council in its assessment of OAN using the 2018-based household projections which recognises the limitations with regard to principal projections from this latest data which use only 2 years of trend data and the fact that household formation will have been suppressed due to restricted supply. We continue to have concerns regarding the application of such a low market signals uplift across the HMA given the significant affordability concerns across many parts of this area, but we agree with the Council's overall assessment that there has been no meaningful change in the housing situation following the publication of the 2018-based household projections.

As is noted in EX0088, PPG outlines that Councils must not only consider the latest available information and whether there has been a meaningful change in the housing situation but also that any consideration should be made in the context of keeping the plan up to date. It is therefore important to recognise that the context within which this plan is being examined – namely under the transitional arrangements as set out in paragraph 214 of the 2019 NPPF. This transitional period was included in the NPPF to allow LPAs that had submitted plans, or were close to submission, to continue with their existing evidence base. The transitional period reflects the Government's desire for a plan led system and the drive to ensure all LPAs had adopted local plans in place. What the transitional period was not meant to lead to was a continued updating of the evidence of supporting local plans submitted prior to January 2019 – particularly were this would not be consistent with the Government's continued aims to boost housing supply to 300,000 homes per year. (Paragraph 6 'Changes to the current planning system' (MHCLG, 2020) <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>)

Indeed the continued reliance on the submitted evidence for transitional plans is supported in the November 2018 letter to Chief Planning Officers which states in its update on the use of the 2016-based household projections in the standard method that plans submitted on or before the 24 January 2019 can be based on existing assessments of housing need at the time of submission. This would suggest that the Government were not endorsing the use of the later household projections within transitional plans in the same way that they have not endorsed their use in the current standard method. It is also important to note that an up to date plan under the 2019 NPPF would require Harlow to deliver 442 dwellings per annum.

As such we would agree with the Council that it is not necessary to modify the housing requirement on the basis of the latest demographic projections. As required by the PPG the Council have considered the latest data and concluded that the 5% change in the OAN across the HMA does not represent a meaningful change in the housing situation. Indeed, maintaining the housing requirement would also take into account the context within which the plan is being

prepared, the advice provided by MHCLG in relation to transitional plans, and the Government's continued goal of delivering 300,000 homes per year.

## **6. Thames Water (Tasha Hurley, Savills)**

*By email, 24/9/20*

Thank you for consulting Thames Water on the above document. Thames Water is the statutory sewerage undertaker for the area and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have been liaising with the Council and adjoining boroughs in relation to sewerage infrastructure requirements to support growth in and around Harlow and will continue to do so in order to ensure that the growth proposed is supported by any necessary wastewater infrastructure.

The Councils position that it does not consider that the housing requirement of 9,200 set out in the Pre-Submission Publication version of the Harlow Local Development Plan needs to be adjusted is acknowledged. Should the housing requirement increase we would welcome early engagement on the impacts on proposed housing delivery so that this can be taken into consideration in relation to the planning of wastewater infrastructure.

## **7. Nazeing Parish Council (Lorraine Ellis)**

*By email, 25/9/20*

I refer to your email dated 09 September 2020 which was considered by this Council at a virtual meeting held yesterday evening, 24 September 2020.

The Councillors wish to place on record that that they deprecate the decision of Harlow Council to release Green Belt land to enable it to fulfil its perceived housing requirement.

As you will appreciate this Council had only a limited period of time in which to consider your email. I shall accordingly be grateful to receive your confirmation that a copy of this letter has been passed to the Inspector.

## **8. Essex County Council (Rich Cooke)**

*By email, 25/9/20*

Thank you for your message of 9 September 2020 consulting Essex County Council (ECC) on the above matter and in particular the report prepared by ORS in response to the Inspector's question on whether the new household projections represent a meaningful change in the housing situation for the purposes of the emerging Harlow Local Development Plan (HLDP).

ECC provides the following response, which reflects ECC's various functional and service delivery roles and as a participant in the HLDP preparation process. The response is made up of two main elements:

- Comments directly on the ORS technical report 'West Essex and East Hertfordshire Housing Market Assessment [Updating Overall Housing Need using the 2018-based projections](#) (September 2020)'
- Related information and wider comments (in summary form) relating to the planned HMA growth strategy and its focus - to be provided through the Harlow & Gilston Garden Town (HGGT)

## ORS report on homes needs and growth for the Harlow Local Development Plan

The key points to make clear initially are that ECC considers this work and its findings / conclusions robust and reliable and compliant with the NPPF and PPG applicable at the time. Therefore, ECC also considers that for the purposes of the Inspector's key question, the 2018 based household projections do not represent a *meaningful change in the housing situation* that would require the HLDP to take a different approach towards its planned housing provision. In particular, ECC acknowledges that as the PPG makes clear:

- 'Establishing future need for housing is not an exact science';
- 'that these household projections provide the starting point estimate of overall housing need'. This then makes it clear that arriving at the overall outcome in respect of this important consideration needs to be a broader process inclusive of a wider range of factors;

And finally that:

- 'A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued'. As ECC has outlined above, it is considered that the September 2020 ORS report demonstrates the latter point.

ECC considers it would be helpful to draw attention to some broader considerations, that are outlined below, although it is appreciated that these will have been raised through the HLDP examination.

### The West Essex and East Hertfordshire HMA Growth Strategy and HGGT Vision

ECC has been an active partner in the evidence base and planning work carried out collectively by these authorities under the Duty to Co-operate over a period of some years. This work (and earlier preceding work, including that for the 2008 RSS) concluded and showed that Harlow was the most appropriate and sustainable location at which to focus planned growth within the HMA. As such, ECC has retained a considerable interest over time in supporting this planned growth and its successful delivery. As the Garden Town documents identify, this scale of transformational growth presents a once in a lifetime opportunity to transform the fortunes of this New Town and to secure its future.

Building upon the above headline points, ECC wishes to emphasise a number of key factors that are considered fundamental to delivering the existing planned scale of growth at Harlow.

The overall planned infrastructure package necessary for Harlow to ensure the growth is sustainable is dependent on achieving sufficient critical mass to enable its delivery. This includes, for example, new infrastructure measures and investments on a very considerable scale, such as M11 J7A, improvements to J7 and the sustainable transport corridors network, as well as the new Princess Alexandra Hospital and new Public Health England HQ. It is vital to recognise and enable the integrity of the overall package of identified transport infrastructure measures, as set out in the MOU on Highways and Transportation Infrastructure for the West Essex / East Hertfordshire HMA (February 2017) – [HDC LP examination document ref. HEBDTC2](#). The emerging HGGT Transport Strategy and its ambitions to achieve a 60% sustainable travel mode share for travel associated with the new strategic developments (and 50% across the wider town) require a high quality network of walking and cycling routes to enable sustainable travel mode shift.

The need to secure sufficient developer funding for much of this infrastructure package is critical and this is tied to the planned scale of growth, as the HGGT IDP and viability assessment show.

The [HGGT Vision document](#) and the HDLP / wider evidence base also set out the imperative for successful regeneration of Harlow. This also applies to the town centre, a focal point for the town that remains in a challenged position, whilst needing to provide a new invigorated hub for the

Garden Town, expected to grow in population by some 50,000 (approx.) extra people over time. The town centre regeneration will prove important in helping to change and improve the town's image and future identity.

Other key elements of regeneration include increasing, widening and improving the town's currently limited housing offer. The currently planned scale of homes growth reflects the Government's key objective of boosting significantly the supply of homes (NPPF paragraph 59). The HLDP as proposed offers the best possible means of delivering successfully on this aim, by providing the confidence and certainty on which landowners, developers and site promoters rely. More affordable homes remain vital given the town's socio-economic demographics, as HDC makes clear in the HLDP and evidenced by the SHMA (2017). Harlow DC's own IDP & HDLP viability assessment (the Delivery Study for Harlow and the Surrounding Area) provide helpful evidence on the pressing affordable homes need and these can be viewed through the HDLP examination webpages – [document ref.s HEBI1 and HEBI2](#) refer. At the same time, it is identified as important to make available a wider homes offer to accommodate other currently under-represented sectors of the population, with a greater ability to spend within the town. The successful Enterprise Zone and relocation of the Public Health England HQ to Harlow and its location within the burgeoning Innovation Corridor, including a thriving medtech / life sciences sector, are drivers behind this need for a better accommodation offer.

Closely related to this is the need to rebuild Harlow's economy and foster inclusive local economic growth. Part of this is to help ensure that the economy becomes resilient. Equally important is that the local population is upskilled, retrained and enabled to obtain well-paid employment in growing, future-proofed sectors and to provide a well skilled workforce for the future, meeting the needs of employers. The latest draft economic evidence work for HGGT indicates the scale of job creation at around 20,000 new jobs (over the Local Plan timeframe), representing a vast contribution to the local and wider economies.

Taken together these key growth derived benefits arising through the planned scale of growth at Harlow, are proposed to help position the town as a much more sustainable self-contained place to live, learn and work. This will enable greater opportunities to live and work locally and redress in / out commuting patterns. The sustainable travel infrastructure will be able to serve both new and existing residents, workers, students, visitors etc. In these ways, the Government's commitment to achieve a carbon neutral position by 2050 will be promoted. This in itself represents a major step forward in local and national efforts to address climate change.

## **Concluding Comments**

Through this submission ECC concludes that it endorses and commends the September 2020 ORS report submitted by the West Essex / East Herts HMA authorities as evidence. In addition, it is considered that the wider but related considerations related in this letter are of equal weight and importance in reaching conclusions on this matter. Therefore, ECC concludes that in relation to the Inspector's key question (for the purposes of the PPG) a meaningful change to the housing situation has not arisen as a result of the 2018 based household projections insofar as the HDLP is concerned.

## **9. Harlow and Gilston Garden Town (Claire Hamilton)**

*By email, 25/9/20*

Thank you for your message of 9 September 2020 consulting the Harlow and Gilston Garden Town (HGGT) on the above matter. HGGT's response to this consultation covers the strategic growth objectives of the Garden Town regeneration proposals.

HGGT, therefore, fully supports Harlow Council's conclusion that a meaningful change to the housing situation has not arisen as a result of the 2018 based household projections insofar as the Harlow District Local Plan is concerned. The reasons for this are set out below:

## **Background to the Garden Town**

Harlow & Gilston Garden Town (HGGT) is a regeneration initiative brought about by the ambitions of five Councils. These are East Herts, Epping Forest and Harlow District Councils alongside Essex and Hertfordshire County Councils.

All five Authorities are working together, having created a joint venture approach to regeneration delivery in this geographical location where the five statutory and regulatory Authorities meet. The joint venture's primary purpose is formally set out in the Harlow & Gilston Garden Town Vision which has been adopted by all five Councils and is reflected in Local Plans.

In January 2017, HGGT was awarded formal Garden Town status by HM Government and, as a result, has received significant funding to work collaboratively across the partner authorities to bring forward the delivery of homes, jobs and associated infrastructure.

The HGGT regeneration project is one of the most significant projects of its kind in the UK and is centred on enabling a people-led Garden Town that not only reopens and rebuilds the local economy post Covid-19 lockdown, but also delivers a thriving and vibrant Garden Community for the next generation to take forward.

## **What is the Garden Town?**

Over the next twenty years, the HGGT will deliver over 24,000 new quality homes in and around Harlow, these will be made up of connected villages and neighbourhoods including open spaces all planned and built in line with the Garden City Principles and integrated into the existing New Town community and its neighbourhoods.

Harlow is located at the centre of the UK's Innovation Corridor. The Garden Town project will create circa 20,000 new jobs, as well as the spaces for businesses of all sizes to start up, scale up or locate to. The Garden Town community will be supported by a growing enterprise-led economy unlocking investment into existing and new employment-led neighbourhoods. These include the Harlow Enterprise Zone, the Science Park and the Town Centre itself.

Harlow and the Garden Town will host the new national headquarters of Public Health England's successor agency; the development of a new state of the art regional Princess Alexandra Hospital and an expanding business community focussed on the life sciences sector.

Led by Harlow District Council, the Garden Town will see the regeneration of the existing town centre; it will be home to a mix of commercial, retail and residential premises, small business workspaces, cultural spaces, public arts, leisure activities and the social infrastructure that supports a thriving voluntary and community sector.

An integrated and sustainable transport network will be delivered to connect all neighbourhoods and centres of the Garden Town - existing and new. The Garden Town will be a place where sustainable modes of travel are the easiest way to get around. East-west and north-south Sustainable Transport Corridors that link neighbourhoods, communities and businesses will be created. The corridors will include high-quality walking and cycling infrastructure, along with new dedicated, fast, accessible and affordable mass transit services.



## Why scale is important

The Garden Town initiative is a catalyst for urban regeneration. The scale of housing development proposed is essential to be the catalyst for growth and, by association, secure the significant developer contributions required to fund the infrastructure to deliver this transformative initiative for Harlow and the wider area.

In recognition of this, HGGT, through HCC acting as accountable body, has been awarded £172 million of Housing Investment Grant to bring forward the early delivery of key infrastructure to ensure the first phase of new homes can be brought forward as soon as possible. A proportion of this grant funding will then be re-paid by developers as part of their s106 contributions to create a Rolling Infrastructure Fund to fund other infrastructure requirements throughout the Garden Town. This mode of investment will unlock growth earlier than possible without Government support and has a wider benefit throughout the whole of the Garden Town.

These infrastructure requirements/projects are set out in the HGGT Infrastructure Delivery Plan. The infrastructure investment which will be levered into HGGT is well over £1 billion and it is the quantum of residential development proposed which makes this possible.

The HGGT must be seen as a holistic initiative spanning the three District and two County Council administrative areas. Each element and geographical area of the project is interrelated and it is the full scale of the development which will deliver the transformational change set out in the HGGT Vision.

A good example to demonstrate this is the proposal to provide a sustainable travel network across the HGGT which will link the new Garden neighbourhoods with key employment areas, the town centre, existing neighbourhoods and transport interchange hubs.

The emerging HGGT Transport Strategy, and its ambitions to achieve a 60% sustainable travel mode share for travel associated with the new strategic developments (and 50% across the wider town), require a high-quality network of walking and cycling routes to enable, and then support, the ambitious sustainable travel mode shift.

This infrastructure will be essential to achieving the significant mode shift required to deliver the Garden Town and must be delivered as a complete network to be effective. Any reduction in housing numbers is likely to put the delivery of this network at risk, which will have a direct and detrimental impact on the delivery of the whole of the HGGT.

The HGGT Vision also sets out the importance of the successful regeneration of Harlow's 1950's town centre. The town centre needs to be regenerated in order to provide the vital commercial and social infrastructure needed to support not only the existing population of 86,000 but the additional Garden Town community as well with its projected population growth of c55,000.

The HGGT initiative also strives to create mixed and balanced communities – a key tenet of the TCPA's Garden City Principles. It is therefore essential to improve Harlow's currently limited housing offer. More affordable homes remain vital given the Town's socio-economic demographics, as HDC makes clear in the HLDP and evidenced by the SHMA (2017). At the same time, HGGT's emerging Housing Plan sets out ambitions to create a more diverse housing offer to encourage economically active households to come to the Garden Town and also to provide families, who are looking for larger and high-quality accommodation, the opportunity to remain. This improvement in all aspects of the HGGT housing offer is intrinsically linked to the economic growth potential of the Garden Town and the wider area and is also essential in providing the housing offer to support the Enterprise Zone growth, the new Princess Alexandra Hospital and the relocation of Public Health England's successor body to Harlow.

Closely related to this is the need to rebuild Harlow's economy and deliver inclusive local economic growth. The local population is upskilled, retrained and enabled to obtain well-paid employment in growth sectors and to equip a well skilled workforce for the future and for meeting the needs of existing and future employers. Funding to support skills and training initiatives will come through the developer contributions arising from the planned housing growth.

## **Summary**

The benefits arising from the planned scale of housing growth in Harlow are considerable and represent a once-in-a-lifetime opportunity to bring about the regeneration of Harlow and the surrounding area. This is recognised by HM Government and significant public funding has been committed to the HGGT to bring about this transformational growth.

HGGT, therefore, fully supports Harlow District Council's conclusion that a meaningful change to the housing situation has not arisen as a result of the 2018 based household projections insofar as the Harlow District Local Plan is concerned.

If you wish to discuss any of the above matters in further detail please do not hesitate to contact me.