



Sustainability Appraisal (SA) of the Harlow Local Development Plan



Interim SA Report

April 2014

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Harlow Local Development Plan (HLDP). SA is a mechanism for considering and communicating the likely effects of a draft plan and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the HLDP is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²

- 2.1.2 In-line with the Regulations, **a report (which we call the ‘SA Report’) must be published for consultation alongside the draft plan** that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

- 2.1.3 The Regulations prescribe the information that must be contained within the SA Report. Essentially, **there is a need for the SA Report to answer the following four questions:**

1. What’s the scope of the SA?
 - The scope must be established subsequent to a review of the sustainability context and baseline, and consultation with designated environmental authorities.
2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration. ‘Reasonable alternatives’ must have been appraised.
3. What are the SA findings at this stage?
 - i.e. in relation to the draft plan.
4. What happens next (including monitoring)?

3 THIS INTERIM SA REPORT

- 3.1.1 At the current time the Council is not consulting on a draft plan. Rather, the Council is consulting on an ‘emerging strategy and further options’, i.e. a preferred spatial strategy and five alternative spatial strategies. This Interim SA Report is produced (voluntarily) with the intention of informing the consultation and subsequent preparation of the draft plan.

Structure of this Interim SA Report

- 3.1.2 Despite the fact that this is an ‘Interim’ SA Report, and does not need to provide the information required of the SA Report, it is helpful to structure the report using the same four questions that will be used to structure the SA Report.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² Directive 2001/42/EC

³ Regulation 12(2)

3.1.3 The structure of this Interim SA Report is as follows:

Part 1 – Answers the question - *What's the scope of the SA?* *

- Part 1 explains how the scope of the SA was developed in-light of 1) scoping work undertaken for the Core Strategy⁴; and 2) scoping work undertaken more recently, in 2014.

Part 2 – Answers the question - *What has Plan-making / SA involved up to this point?*

- Part 2 tells the 'story' of reasonable alternatives identification.⁵

Part 3 – Answers the question - *What are the SA findings at this stage?*

- Part 3 presents an appraisal of the six alternative spatial strategies (i.e. the preferred strategy and five others) presented within the consultation document.

Part 4 – Answers the question - *What happens next?*

- Part 4 explains that subsequent to the current consultation the Council will develop a draft plan for consultation.

* **N.B.** Stakeholders are welcome to comment on the SA scope of the SA at the current time. All consultation responses received in relation to the SA scope will be taken into account when undertaking further appraisal work and, if necessary, the appraisal findings presented within this report will be revised in-light of consultation responses prior to being presented in the SA Report.

⁴ The Council began the process of replacing its existing Local Plan through the publication of the Core Strategy Issues and Options consultation document (2010/11). In-line with changing national policy and guidance, the Council then subsequently chose to progress a 'Local Development Plan' rather than a Core Strategy.

⁵ Part 2 of the SA Report will be able to tell a more in-depth story, i.e. it will be able to explain how the draft plan was developed in-light of the alternatives appraisal findings presented in Part 3 of this Interim SA Report.

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 The SA scope is explained within this Part of the SA Report. Specifically, this Part of the SA Report answers the following questions:

- What’s the Plan seeking to achieve?
- What’s the sustainability ‘context’?
- What’s the sustainability ‘baseline’?
- What are the key issues and objectives that should be a focus of SA?

4.1.2 **Chapter 5** answers the first question by simply introducing the nature of the HLDP.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 11 sustainability ‘topics’:

- | | |
|---|------------------------|
| • Air quality | • Historic environment |
| • Biodiversity and green infrastructure | • Housing |
| • Climate change | • Land |
| • Community and wellbeing | • Landscape |
| • Economy and employment | • Transport |
| | • Water |

4.1.4 These topics were used to structure the 2010 SA Scoping Report, which was prepared in order to inform SA for the Core Strategy. The 2010 Scoping Report also included six ‘spatial’ topic chapters, which focused on reviewing the context, baseline and key issues/objectives specific to areas within Harlow.⁶ It is now felt that this approach is not appropriate, i.e. it is better to scope (and appraise) under ‘thematic’ topics only (with spatially specific matters considered as appropriate under the thematic headings).

4.2 Consultation on the scope

4.2.1 Stakeholders are welcome to comment on the SA scope of the SA at the current time. The SA scope has been consulted upon previously (through consultation on a Core Strategy SA Scoping Report and through consultation on the Interim SA Report published alongside the Core Strategy ‘Issues and Options’ consultation document in late 2010); however, it is recognised that the ‘switch’ from a Core Strategy to a Local Development Plan has implications for the SA scope.

4.2.2 Consultation on the SA scope is a regulatory requirement. Specifically, the Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities are likely to be concerned by the environmental effects of implementing plans’*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage; notwithstanding, the Council is happy to receive comments on the SA scope from any and all interested parties.

⁶ Town centre , Eastern growth area, Neighbourhoods and Industrial and employment areas

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

- 5.1.1 The HLDP will set out the planning framework for Harlow up to 2031 and will contain:
- A vision of how Harlow will grow and develop to meet the needs of the needs of residents and the business community
 - Strategic objectives for the area to achieve the vision which will guide and manage growth
 - A Spatial Strategy which will identify areas of significant change, including those areas of Harlow where change is need and where new growth can be accommodated
 - Core policies which will be high level and set the scene for more detailed policies to be used to assess proposals for development
 - Detailed policies setting out how proposals for development will be assessed
 - Place policies and strategies which will provide further detail on how different areas of Harlow will change during the plan
 - A schedule of infrastructure requirements and a supporting strategy for the implementation of these to ensure development can be accommodated
 - An explanation of how the plan will be monitored and actions implemented if the plan is not performing.
- 5.1.2 The aim of the HLDP is to ensure that, by 2031, the Council and partners will have:
- **Delivered a growing, sustainable and regenerated Harlow** - Increased Harlow’s population with the town to be a growing, sustainable and regenerated centre.
 - **Met Housing Needs** - Provided a sufficient amount, mix and affordability of new homes to meet the needs of the town’s growing population.
 - **Delivered Neighbourhood Renewal** - Renewed neighbourhoods that provide for sustainable and well-connected communities
 - **Secured Economic Revitalisation** – Delivered a prosperous, flexible and modern economy with high quality investment opportunities.
 - **Renewed the Town Centre and other Centres** – Delivered a revitalised and restructured Town Centre and a network of viable and attractive Neighbourhood Centres and Hatches.
 - **Fostered Quality Streets and Spaces** - Enhanced the town’s image by fostering quality streets and spaces whilst protecting the town’s distinctive character and heritage.
 - **Revitalised Green Spaces** – Delivered a revitalised network of multifunctional green spaces that are fully integrated into the built environment, meet the needs of the community and provide ecological opportunities.
 - **Adapted to and Mitigated the Impacts of Climate Change** - Helped to adapt and mitigate against the impact of climate change in the town.
 - **Improved Accessibility and Connectivity** - Reduced the need to travel by promoting sustainable transportation, walking and cycling, made the best use of the transport network and promoted the integration of neighbourhoods in Harlow.
 - **Supported Development and Change** - Ensured that adequate infrastructure and service provision has been provided in new development so that existing and future residents are benefiting from growth.

5.1.3 The Local Plan will be in general conformity with the National Planning Policy Framework (NPPF) published in March 2012, and has to meet the requirements of planning legislation and regulations, including the Duty to Co-operate introduced in the 2011 Localism Act. The Duty to Co-operate places a legal duty on the Council to engage constructively to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. For Harlow, there is a particular need to cooperate with neighbouring Epping Forest and East Herts Districts.

5.2 What's the plan not seeking to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the development management process). The strategic nature of the plan is reflected in the scope of the SA.

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate scope of an SA involves reviewing sustainability context messages in relation to broad issues and objectives. Messages from the review are presented below under the topic headings introduced above.

6.2 Air quality

European context

6.2.1 The **EU Thematic Strategy on Air Pollution**⁷ aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).

The National Planning Policy Framework (NPPF)

6.2.2 Key messages include -

- Plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas.
 - The Air Quality Strategy sets health-based objectives for nine main air pollutants. Performance against these objectives is monitored where people are regularly present and might be exposed to air pollution.⁸
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- Planning policies should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life.

Supplementing the NPPF

6.2.3 Further context is provided by a review of other reports prepared by Government.

The **Local Air Quality Management Review** is a recent Government consultation on the implications of four options focused on improving local air quality management in the UK. As a result of the consultation Defra has indicated that it will:⁹

- Review the range of air quality objectives that apply to local authorities, taking into account their relevance for health protection, and the levels assessed in recent years
- Produce proposals to introduce regular annual reporting on air quality for local authorities
- Take account of the support for retaining AQMAs

6.2.4 The Defra report **Action for Air Quality in a Changing Climate** focuses on the synergies between the two issues of air quality and climate change. It notes the potential for health benefits through the closer integration of climate and air pollution policy. Benefits can be realised through promoting low-carbon vehicles and renewable energy.¹⁰

⁷ Commission of the European Communities (2005) Thematic Strategy on air pollution [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2005:0446:FIN:EN:PDF> (accessed 04/2013)

⁸ Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: <http://www.defra.gov.uk/environment/quality/air/air-quality/approach/> (accessed 04/13)

⁹ Defra (2013) Local air quality management review: Summary of responses and government reply [online] available at: <https://www.gov.uk/government/consultations/local-air-quality-management-in-england-review> (accessed 03/14)

¹⁰ Defra (2010) Air Pollution: Action in a Changing Climate [online] available at: <http://www.defra.gov.uk/publications/files/pb13378-air-pollution.pdf> (accessed 04/13)

6.3 Biodiversity and green infrastructure

International context

6.3.1 In May 1992 European Union governments adopted legislation designed to protect the most seriously threatened habitats and species across Europe. This legislation is called the Habitats Directive and complements the Birds Directive adopted in 1979. At the heart of both these Directives is the creation of a network of protected sites. The Birds Directive requires the establishment of **Special Protection Areas (SPAs)** for birds, whilst the Habitats Directive requires **Special Areas of Conservation (SACs)** to be designated for other species, and for habitats. Also, wetland sites of international importance are designated under the Ramsar Convention. Together, SPAs, SACs and **Ramsar sites** make up what is known as the **Natura 2000 network** of protected sites. All EU Member States contribute to maintaining the 'favourable conservation status' of the network.

6.3.2 The EU Sustainable Development Strategy (2006) included an objective to halt the loss of biodiversity by 2010. More recently at the European level, a new EU Biodiversity Strategy¹¹ was adopted in May 2011 in order to deliver on the established Europe-wide target to **halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020**.

The National Planning Policy Framework (NPPF)

6.3.3 Key messages include -

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species. Protect internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Account for the long-term effects of climate change. Adopt proactive strategies to adaptation and manage risks through measures including multifunctional green infrastructure. Positive planning for 'ecological networks' is one aspect of this.

Other overarching Government policy

6.3.4 The **Natural Environment White Paper (NEWP)** sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was prepared as a response to the UK's failure to halt and reverse the decline in biodiversity by 2010. It was also a response to the *Natural Environment and Rural Communities Act*, which stresses that biodiversity should be viewed as a core component of sustainable development, underpinning economic development and prosperity and offering a range of benefits across local authority service areas.¹² The NEWP signals a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. It also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. Amongst other things, it includes commitments to enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas. The NEWP promotes green infrastructure as a way to manage environmental risks such as flooding and heat waves.¹³

¹¹ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf (accessed 04/13)

¹² http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf?timeline=true (accessed 02/14)

¹³ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf> (accessed 04/13)

6.3.5 The proposals set out in the NEWP are directly linked to the research in the **National Ecosystem Assessment (NEA)**, a major project that was able to draw conclusions on the ‘substantial’ benefits that ecosystems provide to society directly and through supporting economic prosperity. The NEA identified development as a key driver of loss and biodiversity offsetting as a possible means of increasing private sector involvement in conservation and habitat creation.¹⁴

Key messages from other organisations

6.3.6 Wildlife Trust **‘Living Landscape’ initiatives** focus on conservation of biodiversity over large areas of land where habitats are fragmented. Within these areas a spatial approach to ecological restoration aims to:¹⁵

- Protect and maximise the value of areas that are already rich in wildlife;
- Expand, buffer, and create connections and stepping stones between these areas; and
- Make the wider landscape more permeable to wildlife.

6.3.7 Restoration should both provide a healthy environment in which wildlife can thrive and enhance those natural processes that benefit people. It complements the NPPF, which calls for *‘coherent ecological networks that are more resilient to current and future pressures’*. A partnership approach is called for, with local government, agencies, the private sector and voluntary bodies required to act together.

6.3.8 The Wildlife Trusts (with the TCPA) have also produced guidance on **‘Planning for Biodiversity’**. It notes that as well as benefiting biodiversity, green infrastructure can help to *‘deliver and complement some of the services currently provided by hard engineering techniques’*.¹⁶

6.3.9 The TCPA report **Creating Garden Cities and Suburbs Today** calls for at least 40% of a new community’s total area to be allocated to green space. This area should ‘consist of a network of well-managed, high-quality green/open spaces linked to the wider countryside’. These spaces should be of a range of types (e.g. community forests, wetland areas and public parks) and be multifunctional; for instance as areas that can be used for walking and cycling, recreation and play, supporting of wildlife, or forming an element of an urban cooling and flood management system.¹⁷

6.3.10 Recommendations on how to achieve the delivery of such spaces are made in the Landscape Institute **Position Statement on Green Infrastructure**. Recommendations include: Promote collaboration on GI across boundaries through the Duty to Cooperate; and Make developers aware of strategic GI goals and the potential to mitigate the environmental impacts of new development and create beautiful places.¹⁸ *National context (3): Green infrastructure specific context*

¹⁴ UNEP-WCMC (2011) UK National Ecosystem Assessment [online] available at: <http://uknea.unepwcmc.org/Resources/tabid/82/Default.aspx> (accessed 04/13)

¹⁵ The Wildlife Trusts (2010) A Living Landscape: play your part in nature’s recovery [online] available at: <http://www.wildlifetrusts.org/aliveinglandscape> (accessed 04/13)

¹⁶ The Wildlife Trusts & TCPA (2012) Planning for a healthy environment: good practice for green infrastructure and biodiversity [online] available at: <http://www.wildlifetrusts.org/news/2012/07/06/planning-healthy-and-natural-environment> (accessed 04/13)

¹⁷ TCPA (2012) Creating garden cities and suburbs today [online] available at: http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today.pdf (accessed 04/13)

¹⁸ Landscape institute (2013) Green Infrastructure: An integrated approach to land use [online] available at: <http://www.landscapeinstitute.org/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf> (accessed 04/13)

Woodland specific context

- 6.3.11 The final report of the **Independent Panel on Forestry** calls for society as a whole to value woodlands for the full range of beneficial ecosystem services that they can provide. It suggests that local authorities should look at the creative, cross boundary use of green space schemes, including trees and woodland, which make a significant difference to the landscape. It also recommends that Local Plans support sustainable wood and forestry businesses.¹⁹ **The Natural Environment White Paper** also includes a focus on trees and woodlands. An ambition is to create more opportunities for planting woodlands; for more trees in our towns, cities and villages; and a greater proportion of woodlands to be in active management.¹³

Locally specific context

- 6.3.12 The **Essex Biodiversity Action Plan** sets targets for the protection of species and habitats in Harlow. The Plan identifies 25 species and 10 habitat types as a focus for action. The following are relevant to Harlow:²⁰
- **Species:** Brown hare, dormouse, otter, pipestrelle bat, water vole, bittern, grey partridge, skylark, song thrush, great crested newt, stag beetle and black poplar.
 - **Habitats:** Hedgerows, ancient woodland, old orchards, reed beds, urban habitats, neutral grassland.
- 6.3.13 Harlow District Council commissioned EECOS to undertake a **Local Wildlife Sites (LoWS) Review** of all existing wildlife sites that were identified in the 2002 Wildlife Sites Review and to identify any additional areas that should now be designated as LoWSs. The 2010 review has seen a net increase of four sites to give a new total of 42 Local Wildlife Sites, totalling 300 hectares, in the District. The majority of the increase in land area has come from the greatly enlarged river floodplain site Ha5 Eastwick and Parndon Meads.²¹

¹⁹ Defra (2012) The Independent Panel on Forestry: Final report [online] available at: <http://www.defra.gov.uk/forestrypanel/reports> (accessed 02/14)

²⁰ Essex Biodiversity Project (2011) Essex Biodiversity Action Plan 2011 [online] available at: <http://www.essexbiodiversity.org.uk/biodiversity-action-plan> (accessed 02/2014)

²¹ Essex Ecology Services Ltd (EECOS) (2011) Harlow District Council Local Wildlife Sites Review [online] available at: http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Local%20Wildlife%20Site%20Review.pdf?bcsi_scan_AB11CAA0E2721250=0&bcsi_scan_filename=Local%20Wildlife%20Site%20Review.pdf (accessed 02/2014)

6.4 Climate change

European context

6.4.1 In its 2007 strategy on climate change, the **European Commission** assesses the costs and benefits of combating climate change and recommends a package of measures to limit global warming to 2° Celsius.²² On energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.

The National Planning Policy Framework (NPPF)

6.4.2 Key messages include:

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008²³. Specifically, planning policy should support the move to a low carbon future through:
 - planning for new development in locations and ways which reduce GHG emissions;
 - actively supporting energy efficiency improvements to existing buildings;
 - setting requirements for building's in line with the Government's zero carbon policy;
 - positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - encouraging transport solutions that support reduced emissions and congestion.

6.4.3 In terms of **climate change adaptation**, the NPPF is clear that planning authorities should 'adopt proactive strategies' to adaptation, with new developments planned to avoid increased vulnerability to climate change impacts.

6.4.4 The NPPF states development should be directed away from areas at highest risk from **flooding**, and should "not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding". Where development is necessary, it should be made safe without increasing risk elsewhere. Where new development is vulnerable this should be managed through adaptation measures including the planning of green infrastructure.

Supplementing the NPPF

6.4.5 Further context is provided by a review of other reports prepared by Government and various other prominent organisations operating at national, regional, sub-regional and local scales.

6.4.6 In the guidance document **How local authorities can reduce emissions and manage climate risk** planning functions are described as being a 'key lever' in reducing emissions (and adapting localities to a changing climate), with it considered particularly important that local authorities use these to:²⁴

- Enforce energy efficiency standards in new buildings and extensions;
- Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;

²² Commission of the European Communities (2007) Limiting Global Climate Change to 2 degrees Celsius: The way ahead for 2020 and beyond [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF> (accessed 04/13)

²³ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

²⁴ Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] available at: http://hmccc.s3.amazonaws.com/Local%20Authorites/1584_CCC_LA%20Report_bookmarked_1b.pdf (accessed 04/13)

- Work with developers to make renewable energy projects acceptable to local communities; and
- Plan for infrastructure such as low-carbon district heating networks.

6.4.7 The **Climate Local** report has been developed by the Local Government Authority (LGA) and replaces the Nottingham Declaration on Climate Change. It is a strategy aimed at inspiring local authorities to take action to reduce carbon emissions. By signing the commitment councils will be asked to:²⁵

- Set out the actions they intend to undertake locally to reduce carbon emissions and respond to changes in the climate – including understanding their baseline position in terms of carbon emissions and climate vulnerability in order to strategically target resources; and
- Set out their level of ambition and how achievements will be monitored and demonstrated

6.4.8 With regards to low-carbon district heating networks, the DECC report **The future of heating** points out that around half (46%) of the final energy consumed in the UK is used to provide heat, contributing roughly a third of the nation's greenhouse gas emissions. Renewable heat currently represents 1% of heat generation, but Government's vision is of: *buildings benefiting from a combination of renewable heat in individual buildings, particularly heat pumps, and heat networks distributing low carbon heat to whole communities....*²⁶

Sustainable design and construction specific context

6.4.9 Government response to the Environmental Audit Committee Report: Code for Sustainable Homes and the **Housing Standards** Review looks to reduce 100 standards on house building to fewer than 10. This review will result in a number of changes including:²⁷

- Optional building regulations whereby Councils will be able to decide whether they apply to development in their area. For example a different standard on water efficiency may be available for areas facing water shortages
- National space standards to be made available to councils where there is a need and where this will not stop development
- In the future energy efficiency standards will be set through national building regulations, with a new zero carbon homes standard coming into force from 2016.

Adaptation

6.4.10 The **National Adaptation Programme** (NAP) covers four main areas: 1) Increasing awareness; 2) Increasing resilience to current extremes; 3) Taking timely action for long-lead time measures; and 3) Addressing major evidence gaps. An objective (one of 31) is to: "Provide a clear local planning framework to enable all participants in the planning system to deliver sustainable new development, including infrastructure, that minimises vulnerability and provides resilience to the impacts of climate change."²⁸

The report **Climate change, justice and vulnerability** calls for greater recognition of the social dimensions of climate change vulnerability. The effect of an extreme weather event on a person or group is determined not only by their exposure to the event, but also on their vulnerability. For instance, in relation to flooding, low-income households are less able to take

²⁵ Climate Local http://www.local.gov.uk/web/guest/the-lga-and-climate-change/-/journal_content/56/10171/3574359/ARTICLE-TEMPLATE (accessed 02/14)

²⁶ DECC (2012) The Future of Heating: A strategic framework for low carbon heat in the UK [online] available at:

<http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/heat/4805-future-heating-strategic-framework.pdf> (accessed 04/13)

²⁷ DCLG (2014) Government's response to the housing standards review [online] available at:

<https://www.gov.uk/government/news/stephen-williams-announces-plans-to-raise-housing-standards> (accessed 03/14)

²⁸ Defra (2013) National Adaptation Programme [online] available at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/209866/pb13942-nap-20130701.pdf (accessed 02/14)

measures to make their property resilient and to respond to and recover from the impacts of floods.²⁹

Flood risk specific context

- 6.4.11 The **Flood and Water Management Act** sets out the following regarding flood risk management:³⁰
- Incorporate greater resilience measures into the design of new buildings, and retro-fit at risk properties (including historic buildings);
 - Utilise the environment, e.g. utilise land to reduce runoff and harness wetlands to store water; and
 - Identify areas suitable for inundation and water storage.
- 6.4.12 In relation to Sustainable Drainage Systems (SuDS), further guidance is provided in the document **Planning for SuDS**. This report calls for greater recognition of the opportunities for multiple benefits that water management can present. It suggests that successful SuDS are capable of ‘contributing to local quality of life and green infrastructure’.³¹

Locally specific context

- 6.4.13 The *Harlow Infrastructure Studies: Stage 1 and Stage 2 - Final Report* **Stage 1 study**³² assesses the current infrastructure issues affecting Harlow. High dependency on the private car is identified as a key issue. It identifies the need for significant investment in new transport infrastructure to accommodate the planned growth of Harlow; in particular it states that there will be a need to enhance the use of more sustainable modes and encourage cycling and walking.
- 6.4.14 The **Stage 2 study**³³ assesses the infrastructure required to accommodate growth in the future. It recommends that new development should be designed to maximise the use of public transport, walking and cycling through the investment in the physical infrastructure, Travel Planning and Smarter Choices. It also recommends that new residential and employment areas should be designed to encourage and facilitate low car ownership with restricted opportunities for parking. It further suggests that opportunities to locate development closer to the centre of Harlow should be considered.

²⁹ Joseph Rowntree Foundation (2011) Climate change, justice and vulnerability [online] available at: <http://www.jrf.org.uk/sites/files/jrf/climate-change-social-vulnerability-full.pdf> (accessed 02/14)

³⁰ Flood and Water Management Act (2010) [online] at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> (accessed 02/14)

³¹ CIRIA (2010) Planning for SuDs – making it happen [online] available at: <http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465> (accessed 02/14)

³² Atkins (2008) Harlow Infrastructure Study Stage 1 - Final Report [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Infrastructure%20Study%20-%20%20Stage%201%20Report.pdf> (accessed 02/2014)

³³ Atkins and Roger Tym and Partners (2010) Harlow Infrastructure Study Stage 2 - Final Report [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Infrastructure%20Study%20-%20%20Stage%202%20Report.pdf>

6.4.15 The **Local Flood Risk Management Strategy for Essex County Council**³⁴ is an important new tool to help understand and manage flood risk within the county. The strategy sets out a description of historic flood impacts and potential future flood risk in Essex, a summary of the organisations responsible for managing flood risk and their respective roles, details of actions to improve flood risk and details of how actions can be implemented and available funding sources. The strategy identifies and classifies 18 areas within Essex as locally important flood risk areas within Tiers 1 and 2. The Tier 1 criteria is that more than 1000 people are predicted to be at risk and the Tier 2 criteria is that between 1000 and 500 people predicted to be at risk. Harlow is identified as a **Tier One** locally important flood risk area due to surface water risk and flood history. The local Strategic Flood Risk Assessment³⁵ provides a 'categorisation' of flood risk on an area-wide basis, covering both Epping Forest and Harlow, and the application of a risk-based approach to flood risk management.

6.5 Community and well-being

The National Planning Policy Framework (NPPF)

6.5.1 Key messages include -

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- Facilitate social interaction and creating healthy, inclusive communities'.
- Promote retention and development of community services / facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set strategic policy to deliver the provision of health facilities.
- Sufficient choice of school places is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach'.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the local 'individuality'.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

Supplementing the NPPF

6.5.2 Further context is provided by a review of other reports prepared by Government and various other prominent organisations operating at national, regional, sub-regional and local scales.

6.5.3 **Fair Society, Healthy Lives** ('The Marmot Review') investigated health inequalities in England. Subsequently, a supplementary report considered links between spatial planning and health on the basis that there is: *'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'*.³⁶

³⁴ Capita Symonds (2013) Local Flood Risk Management Strategy [online] Available at:

http://www.essex.gov.uk/Publications/Documents/Local_Flood_Risk_Management_strategy.pdf (accessed 03/2014)

³⁵ Epping Forest District Council and Harlow District Council (2011) Strategic Flood Risk Assessment: Final Report [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Strategic%20Flood%20Risk%20Assessment%202011.pdf> (accessed 03/2014)

³⁶ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf> (accessed 02/14)

- 6.5.4 The report highlights three main policy actions to ensure that the built environment promotes health and reduces inequalities. These should be applied on a universal basis, but with a scale and intensity that is proportionate to the level of disadvantage. Specifically these actions are to:
- Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality;
 - Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: improving active travel; improving good quality open and green spaces; improving the quality of food in local areas; and improving the energy efficiency of housing; and
 - Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation.
- 6.5.5 **The Health and Social Care Act 2012** transfers responsibility for public health from the NHS to local authorities³⁷, giving them a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.³⁸
- 6.5.6 Given increased local authority responsibility for public health, recent NHS National Institute of Health and Clinical Excellence (**NICE**) **Guidance** on local measures to promote walking and cycling is of relevance. Relevant recommendations include:³⁹
- Ensure local, high-level strategic policies and plans support and encourage walking and cycling; and
 - Address infrastructure issues that may prevent people from wanting to walk.
- 6.5.7 The Department of Health Guidance on **Health in SEA** considers the many different determining factors that require consideration when assessing influence on health. The use of a broad definition of 'health,' taking into account social determinants is suggested. This implies that plans and programmes may be able to influence health in many ways, both directly and indirectly, and will often be synergistic, with different types of impact combining to bring either benefits or adverse impacts.⁴⁰
- 6.5.8 The TCPA report **Planning Healthier Places** refers to the findings of eight case studies and recommends:⁴¹
- An emphasis on financial viability in planning decisions can underplay the long-term costs to the public purse that are incurred if populations are unhealthy because of the places where they live. There needs to be new engagement between local authorities and their partners, developers and communities to identify how the evidence-based health benefits of investing for the long term can be factored-in.
 - The local plan should be the conduit through which partners engage in local interventions and innovations, bring forward health-promoting large-scale development, plan healthcare infrastructure, or target specific health issues such as obesity and a lack of physical activity. There are extra challenges translating public health into a place-based programme in two-tier authority areas.

³⁷ Upper tier and unitary local authorities

³⁹ NHS National Institute of Health and Clinical Excellence (2012) Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation [online] available at: <http://guidance.nice.org.uk/PH41> (accessed 04/13)

⁴⁰ Department of Health (2007) Draft Guidance on Health in Strategic Environmental Assessment [online] available at: <http://www.apho.org.uk/resource/item.aspx?RID=47085> (accessed 02/14)

⁴¹ TCPA (2013) Planning Healthier Places [online] available at: http://www.tcpa.org.uk/data/files/Planning_Healthier_Places.pdf (accessed 02/14)

- 6.5.9 The Select Committee on Public Service and Demographic Change report **Ready for Ageing?** warns that society is underprepared for the ageing population. Key projections about ageing include 51% more people aged 65 and over and 101% more people aged 85 and over in England in 2030 compared to 2010; and a 90% increase in people with moderate or severe need for social care for the same time period. Organisations involved in urban planning will need to adjust to an older population and will have an important role to play in preventing the social isolation of older citizens. The report says that the housing market is delivering much less specialist housing for older people than is needed.⁴²
- 6.5.10 An Environment Agency report **Under the Weather** presents a toolkit to assist Health and Wellbeing Boards (HWBs) with taking into account climate change adaptation. For example, the report highlights that heat related illness can be addressed through planning of the built environment.⁴³
- 6.5.11 The report **Natural Solutions** looks to highlight evidence from recent studies that demonstrates the important role that the natural world can play in delivering well-being and the delivery of key societal goals such as health, education, urban regeneration and crime reduction. It points to the relationship between access to nature and both physical and mental health benefits. The natural environment is also described as potentially being a resource to help reduce crime levels and increase community cohesion by providing a neutral space in which people can meet and interact. In addition, green spaces can provide environments for effective learning, with this particularly being the case for children not engaged in formal learning.⁴⁴
- 6.5.12 The Environmental Audit Committees report **Sustainable Food** highlights the lack of government guidance on providing communities with better access to local and sustainable food through Local Plans. It recommends that Local Plans ensure communities are provided with open spaces to grow their own.⁴⁵

Gypsies and travellers specific context

- 6.5.13 Lack of suitable, secure accommodation underpins many of the inequalities that Gypsy and Traveller communities experience.⁴⁶ Indeed it is often a Gypsy and Traveller household's support needs that cause them to move from caravans into conventional housing.⁴⁷ In general, households with older members are amongst those affected by shortages of safe and secure accommodation, including roadside dwellers unable to find legal sites to settle on and housed residents experiencing racist harassment or facing eviction. In particular, poor site management and maintenance is known to endanger older residents.⁴⁸ In terms of the quality of site provision, in the UK research has found that although conditions vary, many publically provided sites are of poor quality, with sites built on contaminated land, close to motorways, adjoining sewage works or on other poor quality land. Research indicates that some private sites are worse in physical terms than local authority sites.⁴⁶

⁴² Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> (accessed 04/13)

⁴³ Environment Agency (2014) Under the Weather, Improving Health, wellbeing and resilience in a changing climate.

⁴⁴ New Economic Foundation (2012) Natural Solutions [online] available at: <http://www.neweconomics.org/publications/entry/natural-solutions> (accessed 02/14)

⁴⁵ Environmental Audit Committee (2012) Sustainable Food [online] available at: <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenvaud/879/87902.htm> (accessed 04/13)

⁴⁶ Equalities and Human Rights Commission (2009) Inequalities experienced by Gypsy and Traveller communities: A review [online] available at: <http://www.equalityhumanrights.com> (accessed 02/14)

⁴⁷ Shelter (2007) Good practice: An overview of the issues faced by Gypsy and Traveller communities in accessing housing and services [online] available at: <http://www.better-housing.org.uk/resources/research/good-practice-overview-issues-faced-gypsy-and-traveller-communities-accessing-hou> (accessed 02/14)

⁴⁸ Hodges, N. & Cemlyn, S. (2013) The Accommodation Experiences of Older Gypsies and Travellers: Personalisation of Support and Coalition Policy [online] available at: http://journals.cambridge.org/abstract_S1474746412000413 (accessed 02/14)

6.5.14 Poor health is understood to translate into significantly shorter than average life expectancy rates among Gypsy and Traveller communities, meaning fewer individuals survive into old age.⁴⁹ Research suggests that assumptions that Gypsies and Travellers ‘look after their own’ risk perpetuating older Gypsies’ and Travellers’ unequal access to external services to support their wellbeing⁵⁰. Studies have also shown that frail elderly Gypsies and Travellers with low incomes are often living in poor-quality and inappropriate accommodation, unable to afford general upkeep costs or the costs of repairs. This highlights both a need for services which are responsive to the needs of older Gypsies and Travellers, and the importance of good accessibility to such services for members of the Gypsy and Travellers community.

6.5.15 In terms of education, research has shown that Gypsy and Traveller children in the UK have generally lower levels of educational achievement than the national average, and that this is declining still further, which is contrary to the national trend. Participation in secondary education is extremely low, with discrimination and abusive behaviour on the part of school staff and other students frequently cited as reasons for children and young people leaving education at an early age.⁵¹

Locally specific context

6.5.16 The **Essex Joint Strategic Needs Assessment** identifies Essex as having a number of poverty related issues, particularly in Harlow. The report sets out a number of recommendations to the County’s Health and Wellbeing Board that seeks to improve the health and wellbeing of the county’s residents.⁵²

6.5.17 The **Harlow Regeneration and Social Inclusion Strategy** provides a framework for the Council to prioritise its own actions and activities, and to engage with and influence other relevant organisations. The Strategy seeks to make Harlow a place with an economically thriving and inclusive community with the positive attributes and vibrancy of a city and identifies the regeneration of Harlow’s town centre as the Council’s top corporate priority.⁵³

6.6 Economy and employment

International context

6.6.1 In 2010, the European Union published its strategy for achieving growth up until 2020.⁵⁴ This strategy focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth, aimed at strengthening employment, and social and territorial cohesion.

The National Planning Policy Framework (NPPF)

6.6.2 Key messages include -

- The planning system can make a contribution to building a strong, responsive economy by ‘ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’.

⁴⁹ Crawley, H. (2004) Moving Forward: The Provision of Accommodation for Travellers and Gypsies. London: Institute for Public Policy Research

⁵⁰ Hodges, N. & Cemlyn, S (2013) The Accommodation Experiences of Older Gypsies and Travellers: Personalisation of Support and Coalition Policy [online] Available from: http://journals.cambridge.org/abstract_S1474746412000413 (accessed 02/2014)

⁵¹ Equalities and Human Rights Commission (2009) Inequalities experienced by Gypsy and Traveller communities: A review [online] available at: <http://www.equalityhumanrights.com> (accessed 02/14)

⁵² Essex County Council (2013) The Essex Joint Strategic Needs Assessment [online] Available at: <http://www.essexinsight.org.uk/Resource.aspx?ResourceID=299> (accessed 03/2014)

⁵³ Essex County Council, West Essex NHS, Harlow District Council (2010) Harlow Regeneration and Social Inclusion Strategy (2010 – 2015) [online] Available at: <http://www.harlow.gov.uk/regeneration> (accessed 03/2014)

⁵⁴ European Commission (2010) Europe 2020: A strategy for smart, sustainable and inclusive growth [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF> (accessed 04/13)

- Capitalise on ‘inherent strengths’, and meet the ‘twin challenges of global competition and of a low carbon future’.
- Support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.
- Support competitive town centre environments, including where there are active markets. Edge of town developments should only be considered where they have good access and there will not be detrimental impact to town centre viability in the long term.

Supplementing the NPPF

- 6.6.3 Further context is provided by a review of other reports prepared by Government and various other prominent organisations operating at national, regional, sub-regional and local scales.
- 6.6.4 **The Local Growth White Paper** notes that Government interventions should support investment that will have a long term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. It may be appropriate to focus investment at: Areas with long term growth challenges, so that these areas can undergo transition to an economy that responds to a local demand; or Places that are currently successful, which may have potential for further growth if barriers (e.g. infrastructure) are removed. However, the White Paper also recognises that not everywhere can aspire to become an economic powerhouse. Long term economic trends make differences in economic performance inevitable. Specific examples of areas where it makes sense for Government intervention to tackle market failures include: investment in infrastructure; tackling barriers such as transport congestion and poor connections; other support to areas facing long term growth challenges where this can help them manage their transition to growth industries; and strategic intervention where it can stimulate private sector investment in new green technology in strategic locations. Finally, the White Paper identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings, whilst also focused on businesses that can compete internationally.⁵⁵
- 6.6.5 In order to revitalise **town centres and high streets** it is necessary for Local Authorities to re-imagine these places, ensuring that they offer something new and different that neither out-of-town shopping centres nor the internet can offer. Town centres, high streets and also lower order retail and service facilities can support economic resilience, act as a ‘hub’ for local communities, and play an important role in the shopping hierarchy because of their accessibility. Local policies should look to ‘reinforce local distinctiveness and community value, and develop the social function with a view to underpinning ongoing commercial viability. For example, consider how local parades can provide a ‘seed-bed’ function for start-up businesses.^{56 57}

⁵⁵ BIS (2010) Local Growth: Realising every place's potential [online] available at: <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961> (accessed 02/14)

⁵⁶ DCLG (2012) High streets at the heart of our communities: The Government's response to the Mary Portas Review [online] available at: <http://www.communities.gov.uk/publications/regeneration/portasreviewresponse> (accessed 02/2014)

⁵⁷ DCLG (2012) Parades of shops: towards an understanding of performance and prospects [online] available at: <http://www.communities.gov.uk/documents/regeneration/pdf/2156925.pdf> (accessed 02/2014)

6.6.6 The report **Low Carbon Jobs for Cities** highlights that the challenge of transferring to a low carbon economy also presents an opportunity to create low carbon jobs. It notes that, whilst the future of the UK's low carbon industries rests largely in the hands of central government, local authorities have powers which they can use to 'stimulate low carbon economic activity'. High-tech low carbon jobs will not occur everywhere, and are most likely to be concentrated in areas that already have these strengths. Where these strengths exist, local authorities are encouraged to 'work to develop the 'ecosystem' of high-tech low carbon businesses' through strengthening links between business and universities, and by providing essential infrastructure. In areas without high-tech potential there are also opportunities to develop the low carbon economy. These include improving the energy efficiency of the local housing stock and using planning powers to impose tougher environmental regulations and requirements for renewables generation. In such cases, care must be taken to balance low carbon job creation and losses in other sectors, e.g. construction.⁵⁸

Locally specific context

6.6.7 Harlow is within the **South East Local Enterprise Partnership (SELEP)** which is made up of Local authorities in Essex, Kent and West Sussex. SELEP has produced prepared its Growth Deal and Strategic Economic Plan which sets out its deal with Government for how the Local Growth Fund of £1.2 billion – £200m a year – will be spent across the SELEP area. The plan identifies the following LEP priorities:

- Accelerating Growth: Enterprise and Innovation
- Creating Competitive Locations: Infrastructure and Property
- Building a 21st Century Workforce
- Enabling Housing Growth

6.6.8 The SELEP set out a number of specific priorities for Harlow. This includes a package of improvements aimed at alleviating congestion in Harlow, such as junction improvements, road widening and new slip roads together with a specific requirement for a new junction 7a) for the M11 to unlock employment growth at the Harlow Enterprise Zone and future housing development in the area. Also included are improvements to the A414 and improvements to the West Anglia Mainline to improve access to the Harlow growth locations.

⁵⁸ The Work Foundation (2012) Low carbon jobs for cities: what cities can do to encourage jobs growth in the low carbon economy [online] available at: http://www.theworkfoundation.com/DownloadPublication/Report/317_Low%20Carbon%20Jobs%20for%20Cities.pdf (accessed 02/2014)

6.6.9 The **West Essex Local Investment Plan**⁵⁹ describes a vision for West Essex (comprising of Epping Forest, Harlow and Uttlesford), and sets out priorities for housing, infrastructure, and regeneration activity to deliver the vision over the next 15 years. It draws on the priorities for each local area as set out in key local plans and is an on-going, evolving and dynamic process. A key function of the Local Investment Plan (LIP) is to provide a framework for future partnership working with the Homes and Communities Agency (HCA). The LIP states that the West Essex area offers an unparalleled opportunity in close proximity to London, Cambridge and Stansted Airport, which can deliver economic and jobs growth in the private sector. The LIP also makes specific reference to the large amount of employment land in Harlow. The LIP states that Harlow has an aspiration for housing and economic growth but recognizes the importance of a wider partnership. It further states that Harlow's Neighbouring Districts support the regeneration of Harlow because of the significant benefits this will bring to the wider area, but have significantly less appetite for growth in their Districts. Developing the mutual benefits and the relationship between the opportunities for growth in Harlow and the shared impact on the more diverse strengths of Epping Forest and Uttlesford are regarded as key to the delivery of the LIP.

6.6.10 Harlow is home to one of 24 **Enterprise Zones** set up across England in 2011 to promote business growth and job creation. The Enterprise Zone is split across three sites and aims to create approximately 5,000 jobs in the Advanced Manufacturing, Research and Development, ICT and Health and Allied Industries in Harlow. The Council has put in place three Local Development Orders to fast track planning applications on these sites. The Enterprise Zone aims and objectives reflect Harlow's wider economic growth aspirations for the town which seeks to boost economic growth, diversify the economic base and to capitalise on the town's proximity to the Cambridge and London economies and connections to rest of the UK and beyond.

6.7 Historic environment

The National Planning Policy Framework (NPPF)

6.7.1 Key messages include -

- Set strategic policy to deliver conservation and enhancement of the natural and historic environment.
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Look for opportunities within Conservation Areas, and within the settings of heritage assets, to enhance or better reveal their significance.

Supplementing the NPPF

6.7.2 Further context is provided by a review of other reports prepared by Government and various other prominent organisations operating at national, regional, sub-regional and local scales.

⁵⁹ Epping Forest District Council, Harlow District Council and Uttlesford District Council (2011) Local Investment Plan 2011 [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/West%20Essex%20Local%20Investment%20Plan.pdf> (accessed 03/2014)

- 6.7.3 The Government's **Statement on the Historic Environment for England** calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Also of note is the reference to promoting the role of the historic environment within the Government's response to climate change.⁶⁰
- 6.7.4 English Heritage's **Heritage at Risk National Strategy (2011-2015)** sets out to 'protect and manage the historic environment, in order to reduce the overall number of heritage assets that are at risk or vulnerable of becoming so'. A target is the removal of a quarter of nationally designated heritage at risk assets from the baseline 2010 Register by April 2015, representing a total of 1,137 buildings.⁶¹ The Heritage at Risk report splits assets into: buildings, places of worship, scheduled monuments, registered parks and gardens, registered battlefields, protected wreck sites and conservation areas.⁶²
- 6.7.5 **Understanding place: conservation area designation, appraisal and management** identifies the key aspects of good practice that need to be taken into account by local authorities in managing their conservation areas. It aims to relate the designation and management of conservation areas to the principles of conservation management planning for historic areas, outlines how management of conservation areas relates to the new development plans system and provides references to other relevant information.⁶³
- 6.7.6 **Guidance on the Setting of Heritage Assets** provides the methodology for defining the extent of the setting of a heritage asset, and for determining how development in that setting may impact its historic significance.⁶⁴
- 6.7.7 **Seeing History in the View** presents a method for understanding and assessing heritage significance within views. Relates to any view that is significant in terms of its heritage values and can be used to supplement understanding of views that are already recognised as being important and worth.⁶⁵
- 6.7.8 The Canal & River Trust report **Shaping Our Future** sets out the strategic priorities of the Trust, a new charity set up as successor to British Waterways. The charity will act as guardian to 2000 miles of historic inland waterways in England and Wales. Its new approach will involve a greater emphasis on 'Waterway partnerships made up of local communities, businesses and other organisations. Of the six strategic priorities set out, the most pertinent in terms of plan making is the goal of ensuring that rivers and canals are 'open, accessible and safe'. This will involve 'caring for historic structures and vulnerable habitats'.⁶⁶

⁶⁰ HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx (accessed 04/13)

⁶¹ English Heritage (2011) Heritage at Risk National Strategy 2011-2015 [online] available at: <http://www.english-heritage.org.uk/publications/eh-har-strategy-2011-15/har-strategy-11-15.pdf> (accessed 04/13)

⁶² English Heritage (2012) Heritage at Risk Register [online] available at: <http://www.english-heritage.org.uk/content/publications/publicationsNew/heritage-at-risk/har-2012-lpa/HAR-entries-lpa-2012.pdf> (accessed 04/13)

⁶³ English Heritage (2011) Understanding place: conservation area designation, appraisal and management [online] available at: <http://www.english-heritage.org.uk/publications/understanding-place-conservation-area/> (accessed 03/14)

⁶⁴ English Heritage (2011) Guidance on the Setting of Heritage Assets [online] available at: <http://www.english-heritage.org.uk/publications/setting-heritage-assets/> (accessed 03/14)

⁶⁵ English Heritage (2011) Seeing History in the View [online] available at: <https://www.english-heritage.org.uk/professional/advice/advice-by-topic/setting-and-views/seeing-the-history-in-the-view/> (accessed 03/14)

⁶⁶ Canal & River Trust (2012) Shaping Our Future: Strategic Priorities [online] available at: <http://canalrivertrust.org.uk/media/library/1442.pdf> (accessed 04/13)

Locally specific context

- 6.7.9 The **Old Harlow Conservation Area Management Plan**⁶⁷ and the **Harlow Garden Village Estate Conservation Area Management Plan**⁶⁸ are management and enhancement frameworks that aim to provide positive long-term strategies for guiding development and change in the two conservation areas over a 20 year period. The Management Plans sits alongside their respective Character Appraisals, and proposals contained in the Management Plans are based on the findings of these.
- 6.7.10 The purpose of the Management Plans is to:
- Identify issues, challenges and threats affecting the character of the conservation area;
 - Highlight opportunities to more effectively manage and preserve the special character and key features of the conservation area;
 - Suggest potential enhancement measures which could strengthen and reinforce the character of the conservation area;
 - Provide design guidance and principles for areas covered by Article 4 Directions;
 - Increase public awareness and involvement in the preservation and enhancement of the area;
 - Provide a robust framework for making planning decisions; and
 - Review and clearly define the conservation area boundaries, so that they reflect what is considered worthy of preservation.
- 6.7.11 The Old Harlow Conservation Area Management Plan makes the following recommendations:
- The character of conservation areas should be preserved and enhanced through the use of materials and street furniture which is appropriate to its context and compatible with the historic setting of an area;
 - Street furniture and materials should address and take consideration of landmark buildings as well as historic features and spaces;
 - Bollards should be used sparingly and replicate historic design where they exist; and
 - Signage should have due regard for context and a specific site location rather than be a purely desktop interpretation of national guidance.

6.8 Housing

The National Planning Policy Framework (NPPF)

- 6.8.1 Key messages include -
- To boost significantly the supply of housing, local planning authorities should meet the full, objectively assessed need for market and affordable housing. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.
 - The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.

⁶⁷ Harlow District Council (2013) Old Harlow Conservation Area Management Plan [online] Available at: http://www.harlow.gov.uk/sites/harlow.gov.uk/files/Old%20Harlow%20Conservation%20Area%20Management%20Plan.pdf?bcsi_scan_AB11CAA0E2721250=0&bcsi_scan_filename=Old%20Harlow%20Conservation%20Area%20Management%20Plan.pdf (accessed 03/2014)

⁶⁸ Harlow District Council (2013) Harlow Garden Village Estate Conservation Area Management Plan [online] Available at: http://www.harlow.gov.uk/sites/harlow.gov.uk/files/Harlow%20Garden%20Village%20Estate%20Conservation%20Area%20Management%20Plan.pdf?bcsi_scan_AB11CAA0E2721250=0&bcsi_scan_filename=Harlow%20Garden%20Village%20Estate%20Conservation%20Area%20Management%20Plan.pdf (accessed 03/2014)

Plans for housing mix should be based upon ‘current and future demographic trends, market trends and the needs of different groups in the community’.

- With a view to creating ‘sustainable, inclusive and mixed communities’ authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- Good design is a key aspect in sustainable development. Development should improve the quality of the area over its lifetime, not just in the short term. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- Larger developments are sometimes the best means of achieving supply of new homes.

Supplementing the NPPF

6.8.2 Further context is provided by a review of other reports prepared by Government and various other prominent organisations operating at national, regional, sub-regional and local scales.

6.8.3 **The Housing Report** prepared by the Chartered Institute of Housing identifies the need to produce a step change in housing in order to meet the nations needs and aspirations, especially given that: *‘Many of the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify.* Issues include:⁶⁹

- Overcrowding: This situation is worsening.
- Homelessness: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit.
- Empty Homes: 720,000 homes are classed as empty, but the situation seems to be improving.

6.8.4 The Joseph Rowntree Foundation’s **International review of land supply** and planning systems reviews mechanisms used by other countries to ensure sufficient house building. A key mechanism is ‘Growth management boundaries/urban growth limits’, i.e. Green Belts. There are some examples of successful urban containment and relative price stability over time, notably Portland, Oregon, but successful management requires planners to be pro-active in monitoring and adjusting land supply. The Planning Minister has recently stated that decreasing the English Green Belt from 13% to 12% would meet all identified housing requirements and that this could be done while preserving Green Belt functions. JRF conclude that: *The Green Belt has successfully prevented urban sprawl – but at a price. Evidence from other countries suggests that it should be operated more flexibly, with boundaries revisited regularly.*⁷⁰

⁶⁹ The Chartered Institute of Housing, National Housing Federation & Shelter (2012) The Housing Report: Edition 2 [online] available at: http://england.shelter.org.uk/_data/assets/pdf_file/0008/435653/Housing_Report_2_-_May_2012.pdf (accessed 04/2013)

⁷⁰ Joseph Rowntree Foundation (2013) International review of land supply and planning systems [online] available at: <http://www.jrf.org.uk/sites/files/jrf/land-supply-planning-full.pdf> (accessed 04/2013)

- 6.8.5 Both Policy Exchange (a leading ‘think tank’) and the Town and Country Planning Association (TCPA) highlight poor perception of new development as a key barrier to addressing the housing crisis. Policy Exchange state that ‘*a lot of people object to new development because they assume that the outcome will be buildings that are at best characterless, cheap in everything except price.*’ The solutions suggested by the two organisations are quite different.⁷¹ ⁷² Policy exchange advocates the need for ‘**self-build**’ to make a much more significant contribution. Self-build is where development involves a discrete project for a specific owner. Currently, in the UK 10% of new homes (less in England) are self-build. Councils can support self-build by using land auctions to enable self-builders to procure plot sized areas of land. The TCPA believe that: *Well planned **new communities** provide an opportunity to create high-quality sustainable places, allowing for the highest sustainability standards, economies of scale, and better use of infrastructure. A holistic approach... provides an opportunity to consider how homes and neighbourhoods can be made attractive places in which to live and work, in environments which are socially inclusive and resilient to climate change.* In particular, TCPA advocate developing Garden Cities and Suburbs according to a series of agreed principles. Benefits of this approach include –
- A critical mass to support the necessary facilities for low-carbon lifestyles, such as rapid public transport, low-carbon energy systems, jobs located within walking distance of homes, and a range of cultural and leisure services, including a comprehensive green infrastructure network; and
 - Any negative impacts on the environment can be dealt with in a holistic way, with avoidance, mitigation and compensation considered from the outset.
- 6.8.6 The report **Housing Conditions of Minority Ethnic Households** seeks to quantify the cost of poor housing among minority ethnic households to the NHS and wider society.⁷³
- Around 15% of the 2.2 million ethnic minority households in England are those with at least one Category 1 HHSRS hazard (classified as poor housing).
 - The estimated annual treatment cost to the NHS is around £52m per year if the poor housing amongst the minority ethnic households is left unimproved.
 - Wider costs to society of this poor housing are estimated at 2.5 times the NHS costs.
- 6.8.7 The housing market is not delivering enough **specialist housing**. An adequate supply of suitably located, well-designed, supported housing for older people could result in an increased release onto the market of currently under-occupied family housing, expanding the supply available for younger generations.⁷⁴
- Planning for traveller sites*
- 6.8.8 The Government’s **Planning policy for traveller sites** guidance has the overall aim of ensuring that travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. The government’s aims include:⁷⁵
- Promoting more private traveller sites, whilst recognising that some cannot afford private sites;

⁷¹ Policy Exchange (2013) A right to build: Local homes for local people [online] available at:

<http://www.policyexchange.org.uk/images/publications/a%20right%20to%20build.pdf> (accessed 04/13)

⁷² TCPA (2013) Creating garden cities and suburbs today a guide for councils [online] available at:

http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today_-_a_guide_for_councils.pdf (accessed 04/13)

⁷³ Race Equality Foundation (2014) The Housing Conditions of Minority Ethnic Households in England, Better Housing Briefing 24 [online] available at: <http://www.better-housing.org.uk/briefings> (accessed 02/14)

⁷⁴ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at:

<http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> [accessed 15/03/2012]

⁷⁵ CLG (2012) Planning policy for traveller sites [online] available at:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf> (accessed 04/13)

- Reducing the number of unauthorised development and encampments;
- Ensuring that Local Plans include, fair, realistic and inclusive policies;
- Enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- Having due regard for the protection of local amenity and environment.

Locally specific context

6.8.9 The **LCB East Sub-region SHMA update**⁷⁶ provides a comprehensive and integrated assessment of the strategic housing market for East Hertfordshire, Epping Forest, Harlow and Uttlesford. The SHMA identifies that only a small share of the growth in dwellings in Harlow since 2001 has come through flats or the conversion of larger dwellings.

The **Greater Essex Demographic Forecasts**: Phase 4 has been produced to provide a new evidence base to support the preparation of Local Plans and other planning activities. In July 2012, ONS released the first results of the 2011 Census. This provides a basis for the recalibration of previous mid-year estimates and for the development of new local area forecasts. The report notes the There is an important demographic relationship between the Greater Essex study area and the Greater London Boroughs, particularly those in North East of London.⁷⁷

6.9 Land

The National Planning Policy Framework (NPPF)

6.9.1 Key messages include -

- Protect and enhance soils.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- The value of best and most versatile agricultural land should also be taken into account.
- The NPPF emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use, with inappropriate development in these areas not to be approved 'except in very special circumstances'.

Supplementing the NPPF

6.9.2 Further context is provided by a review of other reports prepared by Government and various other prominent organisations operating at national, regional, sub-regional and local scales.

⁷⁶ Opinion Research Services (2013) LCB East SHMA Update 2012 [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/London%20Commuter%20Belt%20Sub-region%20Strategic%20Housing%20Market%20Assessment%20Update%202012.pdf> (accessed 02/2014)

⁷⁷ Edge Analytics (2013) Greater Essex Demographic Forecasts [online] available at: <http://www.basildon.gov.uk/CHttpHandler.ashx?id=4647&p=0&>

- 6.9.3 In **Safeguarding our Soils: A Strategy for England**, a vision is set out for the future of soils in the country. An element of this vision is the condition of soils in urban areas, which are to be 'sufficiently valued for the ecosystem services they provide and given appropriate weight in the planning system'. Good quality soils in urban areas are recognised as being 'vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities'. That planning decisions take sufficient account of soil quality is a concern of the report, in particular in cases where 'significant areas of the best and most versatile agricultural land are involved'. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another element of the report's vision.⁷⁸

Locally specific context

- 6.9.4 The **Contaminated Land Strategy** for Harlow states that the Council will encourage the reuse of contaminated land for appropriate development, and as useful amenity and recreational space, subject to the elimination of unacceptable risks to health and safety, and the environment. Developers will be required to undertake site investigations and remedial action where necessary.⁷⁹

6.10 Landscape

International context

- 6.10.1 The European Landscape Convention (ELC) came into force in the UK in March 2007. The ELC defines landscape as: "An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." It recognises that the quality of all landscapes matters – not just those designated as 'best' or 'most valued'. Among other things, the ELC commits all signatories to establishing and implementing policies aimed at landscape protection, management and planning / integrating landscape into town planning, cultural, environmental, agricultural, social and economic policies.

The National Planning Policy Framework (NPPF)

- 6.10.2 Key messages include -
- Protect and enhance valued landscapes. Give particular weight to conserving scenic beauty. In designated areas, planning permission should be refused for major development, unless it can be demonstrated they are in the public interest.

Locally specific context

- 6.10.3 The **Green Arc Strategic Highlights Green Infrastructure Plan**⁸⁰ is a strategic / 'county scale' green infrastructure plan covering the GreenArc area with a companion volume for the adjoining Hertfordshire area. The plan identifies a number of proposals of direct relevance to Harlow, including the recognition, conservation and 'future proofing' of 20th century planned and design urban GI heritage such as the New Towns.
- 6.10.4 Further context is provided by a review of other reports prepared by various other prominent organisations operating at national, regional, sub-regional and local scales.

⁷⁸ Defra (2009) Safeguarding our Soils: A strategy for England [online] available at:

<http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf> (accessed 04/13)

⁷⁹ Harlow District Council (2008) Statutory Contaminated Land Strategy [online] Available at:

<http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Contaminated%20Land%20Strategy.pdf> (accessed 04/2014)

⁸⁰ Land Use Consultants (2011) Hertfordshire Strategic Green Infrastructure Plan (Incorporating the GreenArc area) [online] Available at: <http://www.hertsdirect.org/docs/pdf/s/SHiP.pdf> (accessed 03/2014)

6.10.5 The **Harlow Open Space and Green Infrastructure Study**⁸¹ assesses the quantity, quality and value of the open space and green infrastructure in the District. The study forms a key part of the evidence base for the emerging Local Plan and other local policies, and includes locally-derived standards for the provision of open space and recreational facilities in the area. The study makes a number of policy recommendations in relation to:

- Open spaces provision;
- Spatial GI proposals;
- Planning policy recommendations;
- Application of open space standards; and
- Approach to funding and the Community Infrastructure Levy.

6.10.6 The study identifies the main issues relating to Harlow's open spaces to be around the **quality** of existing open spaces and how they relate to the local community in terms of getting **access** to them and overlooking / surveillance of spaces. It recommends that the approach to open space planning in the future will be on **improving the quality** of existing sites as well as **meeting the quantitative needs** of the future population.

6.11 Transport

The National Planning Policy Framework (NPPF)

6.11.1 Key messages include -

- To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for 'a balance of land uses'. Wherever practical, key facilities should be located within walking distance of most properties.
- The transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport), giving people a real choice about how they travel.
- Planning for transport and travel will have an important role in 'contributing to wider sustainability and health objectives'.
- Other organisations amplify the messages from the NPPF:
- The local transport network should support economic growth by providing a safe and efficient transport network, and to manage traffic to improve journey time reliability, reduce emissions and ensure the sustainable movement of people and goods.
- Higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related CO2 emissions. Plans should ensure that strategic policies support and encourage both walking and cycling.

Supplementing the NPPF

6.11.2 Other organisations amplify the messages from the NPPF. For example, the National Institute for Health and Care Excellence state that plans should ensure that strategic policies support and encourage both walking and cycling.⁸²

⁸¹ Land Use Consultants (2013) Harlow Open Space and Green Infrastructure Study [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/Harlow%20Open%20Space%20and%20Green%20Infrastructure%20Study%20Part%201%20-%20Chapter%201%20to%205.pdf> (accessed 02/2014)

⁸² National Institute for Health and Care Excellence (2012) Walking and cycling: local measures to promote walking and cycling as forms of travel or recreation, Public Health Guidance PH41[online] available at: <http://guidance.nice.org.uk/PH41> (accessed 02/14)

- 6.11.3 Higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related CO₂ emissions. Physical infrastructure alone is not sufficient, with a more holistic approach required to incentivise such journeys. Creating a safe physical environment for pedestrians and cyclists – e.g. through fully segregated cycle path; and restrictions on vehicle access – is one important measure.⁸³
- 6.11.4 The Department for Transport *Door to Door* strategy focuses on four core areas which need to be addressed so that people can be confident in choosing sustainable transport: accurate, accessible and reliable information about transport options; convenient and affordable tickets, for an entire journey; regular and straightforward connections at all stages of the journey and between different modes; and safe, comfortable transport facilities.⁸⁴

6.12 Water

International context

- 6.12.1 The Water Framework Directive (2000/60/EC) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The EA is currently seeking to establish 'Significant Water Management Issues' within catchments with a view to presenting second River Basin Management Plans to ministers in 2015. The Plans will seek to deliver the objectives of the WFD namely:
- Enhance and prevent further deterioration of aquatic and wetland ecosystems.
 - Promote the sustainable use of water.
 - Reduce the pollution of water, especially by 'priority hazardous' substances; and
 - Ensure the progressive reduction of groundwater pollution.
- 6.12.2 The WFD has led to the setting up of various protected areas for groundwater such as drinking water protected areas, source protection zones and safeguard zones.
- 6.12.3 The EU's 'Blueprint to Safeguard Europe's Water Resources' highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU's vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.⁸⁵

The National Planning Policy Framework (NPPF)

- 6.12.4 Key messages include -
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply and wastewater.
 - Take account of the effects of climate change in the long term, including factors such as 'flood risk, coastal change, water supply and changes to biodiversity and landscape. Planning authorities are encouraged to 'adopt proactive strategies' to adaptation.
 - New developments should be planned so that they avoid vulnerability to climate change.
 - Development should be directed away from areas at highest risk from flooding, and should "not to be allocated if there are reasonably available sites appropriate for the proposed

⁸³ Lancaster, Leeds & Oxford Brookes Universities (2011) Understanding Walking and Cycling: Summary of Key Findings and Recommendations [online] available at: http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCRReportSept2011.pdf (accessed 02/14)

⁸⁴ Dft (2013). Door to Door: A strategy for improving sustainable transport integration [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf (accessed 04/13)

⁸⁵ European Commission (2012) A Blueprint to Safeguard Europe's Water Resources [online] available at http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final_EN_ACT-cov.pdf (accessed 04/13)

development in areas with a lower probability of flooding". Where development is necessary, it should be made safe without increasing risk elsewhere. Where new development is vulnerable this should be managed through adaptation measures.

Supplementing the NPPF

- 6.12.5 The *Water Framework Directive* (2000/60/EC) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England by the end of 2013. The EA is currently seeking to establish 'Significant Water Management Issues' within catchments with a view to presenting second River Basin Management Plans to ministers in 2015. The Plans will seek to deliver the objectives of the WFD namely:
- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems.
 - Promote the sustainable use of water.
 - Reduce the pollution of water, especially by 'priority hazardous' substances; and
 - Ensure the progressive reduction of groundwater pollution.
 - The WFD provides for a range of measures to protect groundwater quality and has led to the setting up of various protected areas for groundwater such as drinking water protected areas, source protection zones and safeguard zones.
- 6.12.6 The EU's *Blueprint to Safeguard Europe's Water Resources* highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses.⁸⁶ This would also reduce the EU's vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.
- 6.12.7 The Water White Paper sets out the Government's vision for a more resilient water sector, where water is valued as the precious resource it is.⁸⁷ It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.
- 6.12.8 Commitments are made in the White Paper to 'encourage and incentivise water efficiency measures' at the demand side. Through these measures and the demand management measures set out in Water Resource Management Plan's for water companies, the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- 6.12.9 The Water White Paper led to a Government consultation on a national strategy on urban diffuse pollution in 2012.⁸⁸ The consultation report notes that pollutants affecting waterbodies can be broken down into a number of categories including:
- Point Source Pollution - Permitted discharges from factories and wastewater treatment are currently responsible for about 36% of pollution related to failing water bodies; and
 - Diffuse pollution - Unplanned pollution from urban and rural activity, arising from sources such as industry, commerce, agriculture, and civil functions is responsible for 49% of the pollution related to failing water bodies.
 - Agricultural diffuse pollution is responsible for 33% of failures; non-agricultural for 14%. In highly urbanised areas the contribution of urban diffuse pollution is much higher.

⁸⁶ European Commission (2012) A Blueprint to Safeguard Europe's Water Resources [online] available at http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final_EN_ACT-cov.pdf (accessed 02/14)

⁸⁷ Defra (2011) Water for life (The Water White Paper) [online] available at <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> (accessed 02/14)

⁸⁸ Defra (2012) Tackling water pollution from the urban environment [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/82602/consult-udwp-doc-20121120.pdf (accessed 02/14)

- 6.12.10 An Environment Agency strategy implements the requirements of the WFD in relation to groundwater.⁸⁹ The strategy highlights that groundwater is at risk from both point source pollution (for example, a leak from an oil storage tank) and diffuse pollution (for example, fertilisers leaching from land). The good quality of groundwater is crucial for water-dependent plants and animals, and for the use of groundwater as a source of drinking water.
- 6.12.11 The TCPA report *Climate change adaptation by design* notes that climate change is putting additional pressure on current water resource management systems and that changing patterns of rainfall will have a significant impact on water resources and water quality.⁹⁰ Warmer temperatures in the summer time will mean that demand for water grows just as supply (especially in water in rivers and underground aquifers) declines as a result of lower rainfall, with urban areas particular likely to experience shortages during droughts. Low river flows are also less able to dilute pollutants, with knock-on impacts for water quality. The report highlights that adaptation to changes in water availability and quality can be addressed a variety of scales. At the catchment scale greenspace and bluespace strategies should influence development; whilst neighbourhood-level efforts should aim to enhance public spaces. Rainwater harvesting and storage schemes can reduce risk of urban flooding whilst simultaneously providing additional water supplies.
- 6.12.12 In *Green Infrastructure: An integrated approach to land use* the Landscape Institute (LI) make the following recommendations:⁹¹
- Turn strategic GI thinking into reality - Ensure that GI is a core requirement in Local Plans, Infrastructure Development Plans and development briefs. Proper consideration should also be given to the potential for multifunctional GI to perform some of the roles that 'grey' infrastructure is used for, particularly water management and waste. Why? Not only does GI tend to be cheaper, but it also provides infrastructure that is resilient to an increasingly unpredictable climate.
 - Promote collaboration on GI across boundaries - By its nature, GI often crosses administrative boundaries, so it should be addressed through the Duty to Cooperate between local authorities. It should also be part of the remit of Local Enterprise Partnerships.
- 6.12.13 The Government's *Review of Waste Policy in England* (2011) recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. As such, it sets out a vision to move beyond our current 'throwaway society' to a 'zero waste economy'. The report recognises that planning will play a critical role in delivering this ambition. Local Authorities should consider the infrastructure needs of their community from the earliest stages of developing their local policies and plans, and communities should benefit from the hosting of waste facilities.⁹²
- 6.12.14 Local Authority Waste Management Statistics for England - 2011/12 showed:⁹³
- 43% of household waste recycled (the highest percentage on record but the lowest annual increase in ten years);
 - 22.9 million tonnes of household waste generated equal to 431kg of waste per person (continuing the pattern of annual reductions seen since 2007/2008); and

⁸⁹ Environment Agency (2012) GP3: Groundwater Protection: Policy and Practice [online] available at: <http://www.environment-agency.gov.uk/research/library/publications/144346.aspx> (accessed 02/14)

⁹⁰ TCPA (2007) *Climate change adaptation by design: guide for sustainable communities* [online] available at: http://www.tcpa.org.uk/data/files/bd_cca.pdf (accessed 02/14)

⁹¹ Landscape Institute (2013). *Green Infrastructure: An integrated approach to land use* [online] available at <http://www.landscapeinstitute.org/PDF/Contribute/2013GreenInfrastructureLIPositionStatement.pdf> (accessed 04/13)

⁹² Defra (2011) *Government Review of Waste Policy in England* [online] available at: <http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf> (accessed 02/14)

⁹³ Defra (2012) *Local Authority collected waste for England* [online] available at: <http://www.defra.gov.uk/statistics/environment/waste/wrfq22-wrmswqtr/> (accessed 02/14)

- 10.7 million tonnes of waste collected recycled, composted or reused by local authorities (for the first time this figure was greater than the amount landfilled).

7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Key messages from the review are presented below under the topic headings introduced above.

7.2 Air quality

7.2.1 There are no Air Quality Management Areas designated in Harlow, however traffic emissions are identified as being the most significant source of air pollution in the District. The most recent Air Quality Progress Report for the District (2013) shows that Harlow is currently meeting the air quality objectives⁹⁴ and is not at risk of exceeding the objectives for Nitrogen Dioxide. The Council is working in partnership with key stakeholders to ensure that the Air Quality in Harlow remains below objective limits and continues to improve.⁹⁵

7.3 Biodiversity

7.3.1 Harlow Woods SSSI on the south-west edge of the Town consists of two woodland blocks (Parndon Wood, which is also designated as a Local Nature Reserve; and Riden Wood). Up until 2007 the SSSI was described as 'Unfavourable Declining', but has since been the subject of a management plan. Approximately 54% of the SSSI now has 'unfavourable recovering' status, while 46% has 'favourable' status.

7.3.2 The other SSSI is Hunsdon Meads, which straddles the boundary with East Hertfordshire District Council. This area, which is associated with the River Stort, has 'unfavourable recovering' status.

7.3.3 Numerous Local Wildlife Sites surround Harlow, primarily associated with woodland blocks and the Stort Valley. Some areas of Green Wedges are also designated as Local Wildlife Sites. In total Harlow contains some 134 hectares of Woodland which forms a significant aspect of Harlow's landscape and plays an important role in supporting biodiversity. Six of the woodland parcels are classified as Ancient Woodland.

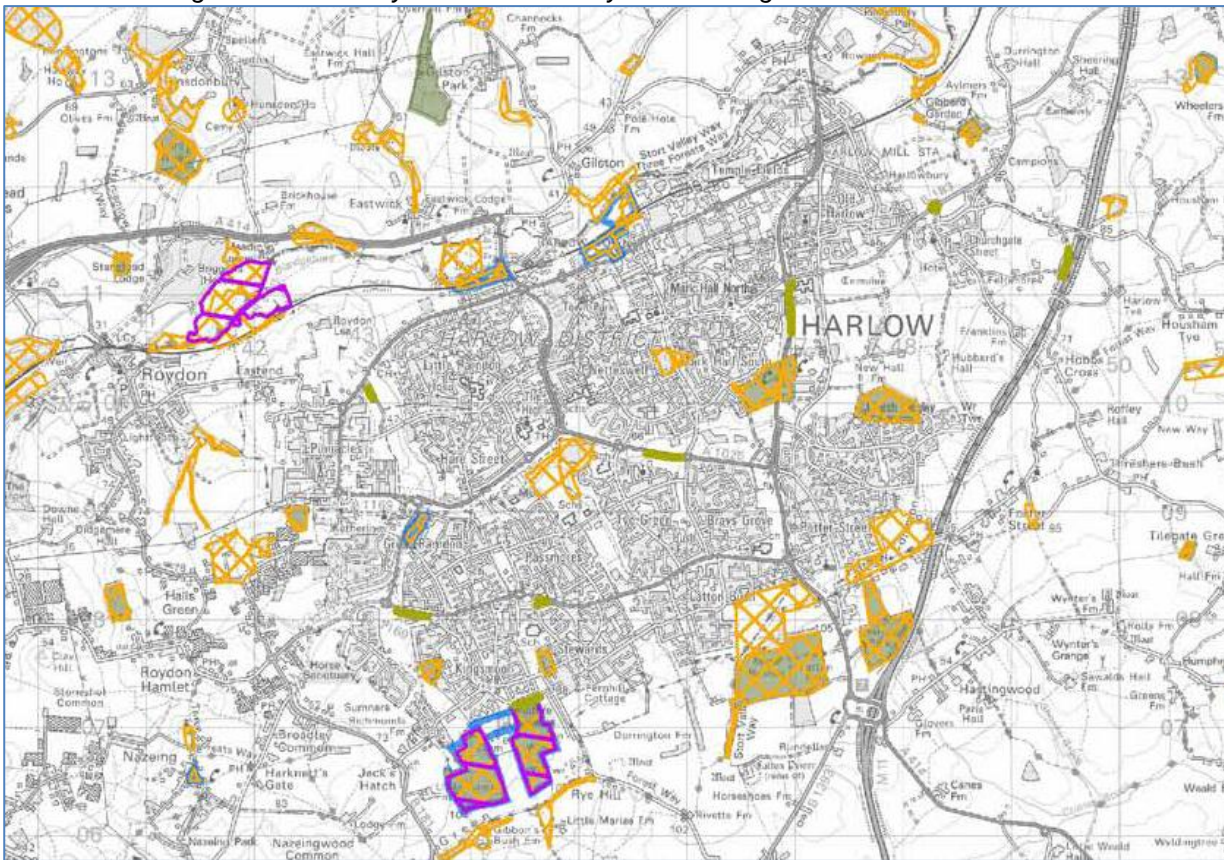
7.3.4 Climate change is set to impact species populations associated with woodland and other habitats that now exist as patches within a 'fragmented' landscape. Where this is the case, species populations will be unable to shift in response to climate change.⁹⁶

⁹⁴ The air quality objectives applicable to Local Air Quality Management in England are set out in the Air Quality (England) Regulations 2000 (SI 928)

⁹⁵ Harlow District Council (2013) 2013 Air Quality Progress Report for Harlow Council [online] Available at: http://www.essexair.org.uk/AQInEssex/LA/Harlow.aspx?View=reports&ReportType=Harlow&ReportID=Harlow_PR_2013&StartIndex=1&EndIndex=7 (accessed 03/2014)

⁹⁶ Natural England (2007) Planning for biodiversity as climate changes - BRANCH Final Report [online] available at: <http://webarchive.nationalarchives.gov.uk/20081125212930/http://www.branchproject.org/reports/finalreport.pdf> (accessed 02/14)

Figure 7-1 Statutory and non-statutory nature designations in the district.⁹⁷

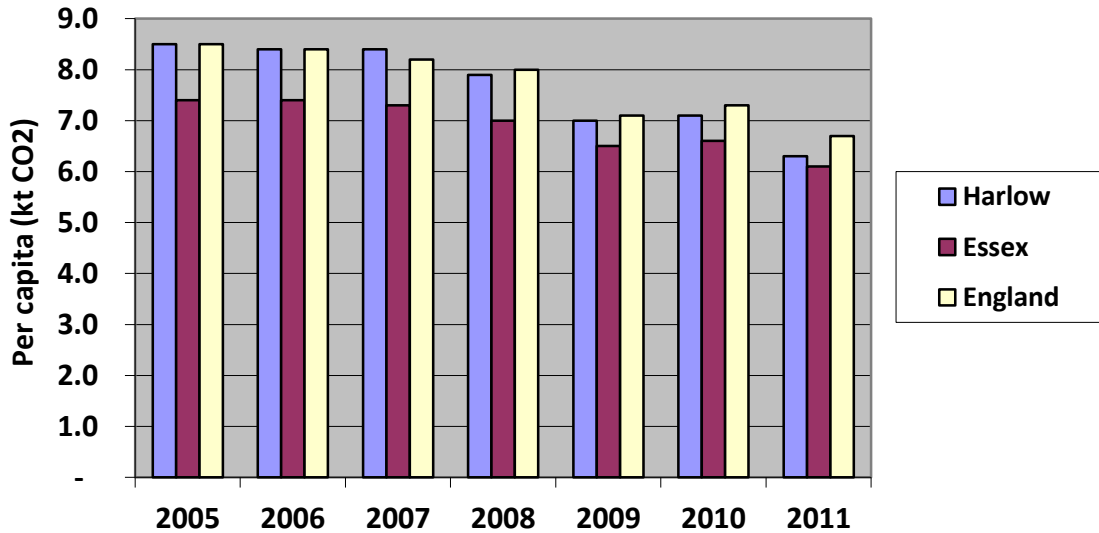


⁹⁷ Chris Blandford Associates (2005) Green Infrastructure Plan for Harlow District [online] available at: http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Green%20Infrastructure%20Plan%20for%20the%20Harlow%20Area.pdf?bcsi_scan_E956BCBE8ADBC89F=0&bcsi_scan_filename=Green%20Infrastructure%20Plan%20for%20the%20Harlow%20Area.pdf (accessed 02/2014)

7.4 Climate change

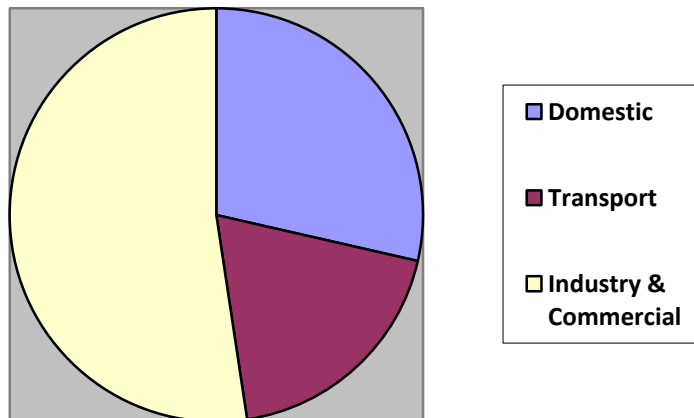
7.4.1 The carbon dioxide emissions per capita in Harlow are higher than those for Essex but lower than those for England as a whole (Figure 7-2). Between 2005 and 2011 the carbon dioxide emissions per capita in Harlow declined from 8.5 to 6.3 kt. This compares to average figures at the county level of 7.4 and 6.1 kt, and at the national level of 8.5 and 6.7 kt.

Figure 7-2 Carbon dioxide emissions per capita (kt CO₂)⁹⁸



7.4.2 The key sources of carbon dioxide emissions in Harlow in 2011 (the latest year for which data is available) are shown in Figure 7-3 below. Most emissions (just over 52%) come from the industrial and commercial sector, approximately 28.5% are from the domestic sector and just over 19% from the transport sector (the figures do not add up to 100% because land use and land use change offset a small percentage of emissions).

Figure 7-3 Proportionate split of carbon dioxide emissions by source in 2011. **Error! ookmark not defined.**



⁹⁸ DECC (2011) Local Authority Carbon Dioxide Emissions [online] available at: <https://www.gov.uk/government/publications/local-authority-emissions-estimates> (accessed 02/2014)

7.5 Community and well-being

- 7.5.1 Although Harlow reached its original target population of around 81,000 people in 1974, Harlow has since experienced an overall stagnation of its population.⁹⁹ Despite the town's population growing between 2001 and 2011 the town's population has only increased by 1.5% in 40 years.¹⁰⁰
- 7.5.2 The population for Harlow in 2011 was estimated to be 81,944.¹⁰¹ In 2001 the population was estimated to be 78,768; this therefore represents an increase of 3,176, which equates to an average annual increase of 317. Based on population projections drawn from the results of the 2011 census, the population of Harlow is predicted to 89,720 by 2021.¹⁰²
- 7.5.3 Harlow has a relatively young age profile with the average age of those in the district standing at 38.2. Harlow has an average age in the lowest 40% of districts nationally, whilst the sub-region has an average age in the highest 40% of sub regions nationally.¹⁰³
- 7.5.4 Harlow is relatively deprived and this is reflected in its ranking as the 95th most deprived local authority in England (of 326 authorities), which puts it in the most deprived 30%. While the Council's evidence highlights the importance of retaining the principle of the broad neighbourhood structure of the town¹⁰⁴, the Indices of Multiple Deprivation mapping overleaf shows that some of Harlow's neighbourhoods are experiencing localised deprivation.
- 7.5.5 Figure 7-4 below shows:¹⁰⁵
- Lower Super Output Areas (LSOAs) of deprivation are concentrated towards the centre of the district, particularly around the town centre.
 - The most deprived LSOA in the district is ranked 4,912th out of the 32,482 LSOAs nationally. This LSOA is highlighted in white.
 - LSOAs of relative affluence are concentrated in the east of the district. The most affluent LSOA in the district is ranked 29,347th nationally.

Figure 7-4 Indices of Multiple Deprivation by LSOA (2012) for Harlow – The darker the colour the higher the level of deprivation.

⁹⁹ Nathaniel Lichfield & Partners (2013) Harlow Future Prospects Study [online] Available at: (accessed

¹⁰⁰ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹⁰¹ Office for National Statistics (2013) Harlow – Population Density [online] Available at: <http://www.neighbourhood.statistics.gov.uk> (accessed 02/2014)

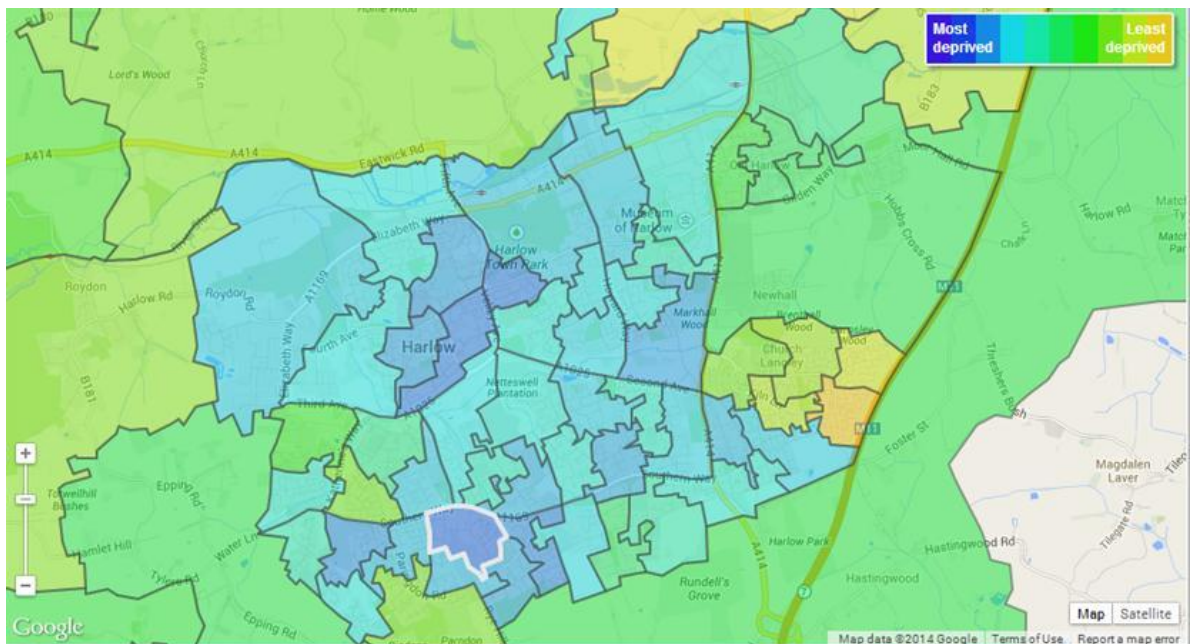
¹⁰² Edge Analytics (2013) Greater Essex Demographic Forecasts [online] available at:

<http://www.basildon.gov.uk/CHttpHandler.ashx?id=4647&p=0&>

¹⁰³ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹⁰⁴ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹⁰⁵ Open Data Communities (2012) Deprivation Map Explorer [online] Available at: <http://opendatacommunities.org/deprivation/map> (Accessed: 03/2014)



- 7.5.6 Many of the most deprived areas also experience the lowest levels of life expectancy, poor educational achievements, higher levels of teenage pregnancy, poor housing (including fuel poverty) and generally higher levels of social and health care needs.¹⁰⁶
- 7.5.7 Renewing the most deprived areas should be a key priority for the planning strategy. Specific requirements identified by the Council include the need to increase housing within neighbourhoods through higher density refurbishment and the replacement of obsolete housing, diversifying the housing stock and addressing poor public realm within and around residential areas.¹⁰⁷
- 7.5.8 The Town Centre, neighbourhood centres and many of the town’s Hatches are deteriorating with a risk of long term decline if no intervention is made. There are issues with the quality of the retail offer and the physical environment at these locations.¹⁰⁷
- 7.5.9 81% of Harlow’s population are considered to be in very good (45.1%) or good (35.9%) **health**. This is slightly lower than the regional (82.4%) and national (81.4%) levels.¹⁰⁸ At 128.96 per 100,000 people, the cancer mortality rate in Harlow is very high, with the area ranked in the top 20% of districts nationally.¹⁰⁹ Local priorities are to reduce smoking, mental health, drug and alcohol abuse and to promote independence and self-worth in older people.¹¹⁰
- 7.5.10 *Figure 7-5 below shows that **life expectancy** in the district is lower for both men (78.2) and women (82.4) compared to the regional and national level.¹¹¹*
- 7.5.11 *Figure 7-5 Average life expectancy in Harlow, Essex and UK (2010-12)¹¹¹*

¹⁰⁶ Essex County Council (2013) The Essex Joint Strategic Needs Assessment [online] Available at: <http://www.essexinsight.org.uk/Resource.aspx?ResourceID=299> (accessed 03/2014)

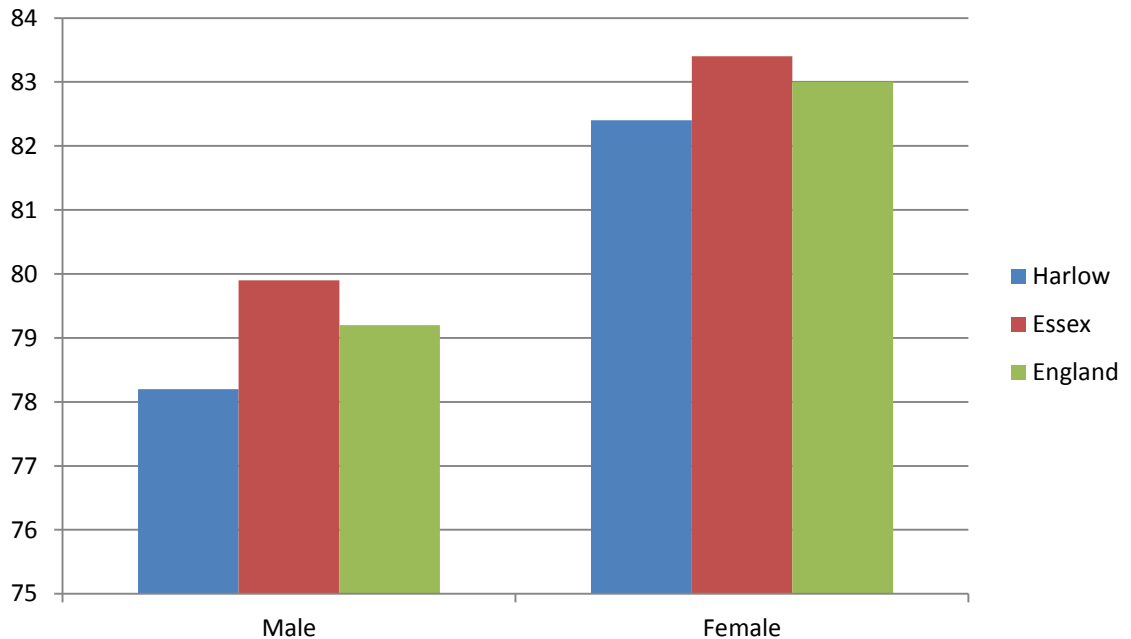
¹⁰⁷ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹⁰⁸ Office for National Statistics (2013) Harlow – Key Figures for Health and Care [online] Available at: <http://www.neighbourhood.statistics.gov.uk> (accessed 03/2014)

¹⁰⁹ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹¹⁰ Public Health England (2013) Harlow [online] Available at: http://www.apho.org.uk/default.aspx?QN=HP_FINDSEARCH2012 (accessed 03/2014)

¹¹¹ Office for National Statistics (2013) Life expectancy at birth (2010-12) [online] Available at: <http://www.statistics.gov.uk> (accessed 03/2014)



7.5.12 At the county level, 28.9% of people in Essex are estimated to be **obese**. Estimates suggest that of all Essex local authorities, Harlow has the highest rate of obesity (31.1%).¹¹² In terms of access to open space, the Harlow Open Space and Green Infrastructure Study has identified areas of Harlow with surplus, adequate or a deficit in open space provision.

7.5.13 In terms of **education** -

- Harlow is ranked 326 out of 406 districts on skills and qualifications score¹¹³, with the district performing in the bottom 20% of districts by national standards.¹¹⁴
- In 2011/12, 55% of Harlow secondary school pupils achieved five or more GCSEs at A*- C GCSEs or Equivalent, including English and Mathematics. This represented a 5% increase from the previous year.¹¹⁵ The 2011/12 figure is lower than the regional (58.1%) and national (58.8%) figures.¹¹⁶
- The Annual Population Survey suggests that the rate of persons with ‘other qualifications’ is growing (10% in 2011). The proportion with NVQ3 and above and NVQ4 and above has also increased with 46% achieving an NVQ3 and above in 2011 and 28% achieving an NVQ4 and above in 2011.¹¹⁷
- Of working age Harlow residents, 19.69% had either NVQ level 1 or no qualifications, compared with 21.89% in Essex and 16.71% nationally. The proportion of residents with

¹¹² Essex County Council (2013) The Essex Joint Strategic Needs Assessment [online] Available at: <http://www.essexinsight.org.uk/Resource.aspx?ResourceID=299> (accessed 03/2014)

¹¹³ This composite score presents an index of the qualifications of an area’s workforce, relative to the GB value. A higher score indicates a high level of local area qualifications amongst the labour market.

¹¹⁴ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹¹⁵ NHS North Essex (2012) Local Authority Portrait Series - Harlow [online] Available at: <http://www.essexinsight.org.uk/Resource.aspx?ResourceID=381> (accessed 03/2014)

¹¹⁶ Office for National Statistics (2013) Harlow: Key Figures for Education, Skills and Training [online] Available at: <http://www.neighbourhood.statistics.gov.uk> (accessed 03/2014)

¹¹⁷ Harlow District Council (2013) Harlow Labour Market Statistics [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Labour%20Market%20Statistics%202013.pdf> (accessed 03/2014)

NVQ level 2 is high, whilst the proportion with NVQ level 3 and above is low. 28% held a degree or equivalent in 2011, compared to 23.43% in Essex and 33% nationally.¹¹⁸

7.5.14 In terms of **crime** –

- Harlow is ranked 56 out of 376 districts in terms of its score for crime¹¹⁹, indicating levels that are in the highest 20% of districts nationally.¹²⁰
- Crime statistics indicate that the most common crimes in Harlow are Criminal Damage and Arson (882 incidents between April 2012 and March 2013) and Vehicle Offences (Includes Theft of and from Vehicles) (700 incidents between April 2012 and March 2013). Both rates have declined from the previous year (from 1,031 and 710 respectively).¹²¹
- Harlow has a unique typology of streets and open spaces which are important to the new town character of Harlow. However, there are concerns over the quality of the public realm. In a number of cases the existing layout of streets and spaces does not provide positive, safe and lively environments for users. Different movement modes are segregated with the car dominating green wedges and pedestrian routes are largely separated from areas of activity. These issues are widespread but particularly relevant for the southern parts of the town and along Southern Way.¹²²

7.5.15 Harlow ranks 63rd out of 407 districts in terms of an indexed amenity score, which is based on the provision of amenities such as cinema seats, theatres, museums, galleries, libraries, hotels, restaurants and pubs, and heritage sites relative to the national average.¹²³

7.6 Economy and employment

7.6.1 The size of Harlow's economy is around the national median, with an indexed economic score of 65.33 relative to the national average of 100. This is lower than Essex which scores 129.72. The average total income in Harlow is below the national median (£22,600), with the area ranking in the bottom 40% of districts. This compares with £30,605 in Essex and £26,845 nationally.¹²⁴

7.6.2 When compared with comparable towns, Harlow performs less well on a range of measures including employment growth, GVA per worker, knowledge based businesses, skills base and retail ranking.¹²² Harlow was ranked 234 in the 2013 UK Competitiveness Index; this represents a drop of 127 places on its 2010 ranking, making it the second biggest faller of local authorities in England in 2013.¹²⁵

¹¹⁸ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹¹⁹ This indicator provides an index of the total number of offences per 1,000 resident population. Total offences include theft from vehicles; dwelling burglary; robberies; sexual offences and violent offences.

¹²⁰ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹²¹ Office for National Statistics (2013) Harlow: Notifiable Offences Recorded by the Police [online] Available at: <http://www.neighbourhood.statistics.gov.uk> (accessed 03/2014)

¹²² Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹²³ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹²⁴ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹²⁵ Cardiff University (2013) UK Competitiveness Index 2013 [online] Available at: <http://www.cforic.org/downloads.php> (accessed 03/2014)

- 7.6.3 Harlow ranks 154th of 408 districts on industrial structure score, with its knowledge economy mainly focused on production¹²⁶. This district is in the top 20% of districts by this measure, with 7.9% of employment in this sector, compared to 3.16% in Essex and 2.89% nationally. However, employment in knowledge-driven services¹²⁷ is below the national median, with 11.33% of employed in this sector, compared to 15.16% in Essex and 18.85% nationally.¹²⁸
- 7.6.4 Overall, Harlow is ranked 346 out of 406 districts on knowledge worker score, placing it in the bottom 20% of districts nationally¹²⁹. There is considered to be a strong correlation between the presence of knowledge workers and prosperity in a local population.¹³⁰
- 7.6.5 The number of employees in Harlow fell by 1.9% between 2010 and 2011. This reflects a very weak level of economic growth relative to national standards, placing Harlow in the bottom 20% of districts.¹³¹ The unemployment rate in Harlow in 2012/13 was 10.5%. This is significantly higher than the equivalent rate at the regional (6.6%) and national (7.8%) level.¹³² Research indicates that around 1/6 of people in Harlow that are on job seekers allowance are unable to access employment centres by public transport or walking. This is identified as a possible barrier to future employment opportunities for those without access to a car.¹³³
- 7.6.6 The Employment Land Review projects employment in Harlow will increase by 3,900 jobs in the period 2011 – 2031 which represents a growth rate of 0.4% per annum. This is marginally higher than the 0.3% per annum averaged in Harlow over the previous 20 year period. However, if these projections are viewed from the 2008 jobs peak then the town would have lost approximately 400 jobs by 2031. This is because the town would have only recaptured the jobs lost during the recession.¹³⁴ **Error! Bookmark not defined.**
- 7.6.7 Approximately 14% of Harlow's employed residents commute to London and in overall terms the labour market is well balanced with Harlow having a net in-flow of just over 500 workers. However, the district is a net importer of managers and professionals from its immediate neighbours (East Hertfordshire, Epping Forest and Uttlesford) but a net exporter of workers in lower occupations.¹³⁴ Whilst workplace wages remain higher in Harlow than neighbouring towns, Harlow residents earn on average 23% less than those who commute into the district to work.¹³⁵ Harlow's residents earn significantly lower wages (£466.10) per week than those in comparative towns Basildon (£549.20) and Stevenage (£544.50).¹³⁶

¹²⁶ Knowledge driven production is defined as: aerospace, electrical machinery manufacture, printing and publishing, and chemicals and energy

¹²⁷ Knowledge driven services are defined as: telecommunications, computing, R& D, finance and business services, and recreational and cultural services

¹²⁸ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹²⁹ This residence based figure provides an index of the proportion of the working age population who are employed in knowledge occupations.

¹³⁰ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹³¹ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹³² Office for National Statistics (2013) Key Figures for Economic Deprivation [online] Available at: <http://www.neighbourhood.statistics.gov.uk> (accessed 03/2014)

¹³³ NHS North Essex (2012) Local Authority Portrait Series - Harlow [online] Available at: <http://www.essexinsight.org.uk/Resource.aspx?ResourceID=381> (accessed 03/2014)

¹³⁴ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹³⁵ Epping Forest District Council, Harlow District Council and Uttlesford District Council (2011) West Essex Local Investment Plan 2011 [online] Available at:

<http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/West%20Essex%20Local%20Investment%20Plan.pdf> (accessed 03/2014)

¹³⁶ Harlow District Council (2013) Harlow Labour Market Statistics [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Labour%20Market%20Statistics%202013.pdf> (accessed 03/2014)

- 7.6.8 Harlow has traditionally been a good location for manufacturing and industrial businesses, but there has been a decline in the number of such businesses in recent years. In 2003 there were 257 manufacturing businesses within the town, whilst there were 232 by 2007. This figure is expected to have decreased further since 2007. Nonetheless, the proportion of floorspace that is in industrial use remains high, with 71.19% of total floorspace in industrial use, compared to 61.8% in Essex and 60.5% nationally.¹³⁷
- 7.6.9 Harlow's employment composition has a greater proportion of larger employers in comparison with the regional and national picture. At 82%, Harlow also has a lower percentage of small businesses (employing 1-10 persons) compared with Essex (87%), East of England (86%) and England (85%). Between 1998 and 2008 the number of businesses per 1,000 population increased from 28 businesses per 1,000 to 52.9 businesses per 1,000. However in 2012 the number of businesses per 1,000 population was recorded at 45 per 1,000 population.¹³⁸ **Error! oomark not defined.**
- 7.6.10 Harlow's main industrial areas are located to the north and west of the Town. The main retail area is located to the centre of the town (Town Centre) and Templefields (retail park). Harlow contains one Enterprise Zone which is located in the north east of the district. The Enterprise Zone is split across two sites that cover approximately 51 hectares: 23 hectares at the London Road Campus and 28 hectares at Templefields North East. Both sites are located close to the A414 providing easy access to the M11, London and Cambridge. The Enterprise Zone is intended to be sector-led, focused on Harlow and West Essex's economic strengths in the Health and Allied Industries (particularly the Medical Technologies) sectors, and seeks to attract 100 businesses and to create a minimum of 2,500 jobs.¹³⁹ The first major development to take place at the Enterprise Zone will be the Anglia Ruskin University Med Tech Campus, which will provide a health innovation centre delivering research and development services to businesses working in the health and life sciences sectors.¹⁴⁰
- 7.6.11 In order to ensure that the town's services, facilities and main shopping destinations remain viable, the Council will need to increase the town's population.¹⁴¹

7.7 Historic environment

- 7.7.1 Key elements of Harlow's historic environment include:
- Ten Conservation Areas: the majority of these are concentrated in the east of the district, close to Old Harlow;
 - Over 168 Statutory Listed Buildings: five are Grade I, eight are Grade II* and the rest are Grade II;
 - 26 Locally Listed Buildings;
 - 11 Scheduled Monuments;
 - One Registered Park and Garden: The House, Marsh Lane. This stands in two hectares of garden in farmland in the Stort Valley on the eastern edge of Harlow¹⁴²; and
 - The River Stort and its navigation run along the town's northern boundary. This provides a number of leisure and tourism opportunities including walks, boat trips, and angling.

¹³⁷ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹³⁸ Harlow District Council (2013) Harlow Labour Market Statistics [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Labour%20Market%20Statistics%202013.pdf> (accessed 03/2014)

¹³⁹ Harlow District Council (2011) Harlow Enterprise Zone Fact Sheet [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/Enterprise%20Zone%20Harlow%20Fact%20Sheet.pdf> (Accessed: 03/2014)

¹⁴⁰ Harlow District Council (2014) Enterprise Zone [online] Available at: <http://www.harlow.gov.uk/enterprise-zone> (Accessed: 03/2014)

¹⁴¹ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹⁴² English Heritage (2014) List Entry: The House, Marsh Lane [online] Available at: <http://list.english-heritage.org.uk/resultsingle.aspx?uid=1001299> (Accessed 03/2014)

7.7.2 There are no buildings on English Heritage's Heritage at Risk Register in Harlow.

7.8 Housing

7.8.1 The average house prices in Harlow stand at £188,644. This is in the middle 20% of districts nationally and compares to an Essex figure of £237,099 and a national figure of £238,638. Household size in the district is relatively high, averaging 2.36 people, which places it in the top 40 of districts nationally.¹⁴³

7.8.2 Harlow is ranked 217 out of 375 districts in terms of its housing affordability score¹⁴⁴, indicating that the area is in the middle 20% of districts nationally. Rates of renting are high, with 42% of households renting compared to 28.1% in Essex and 30.4% in England. Correspondingly, owner occupation is low, with Harlow placed in the bottom 20% of districts nationally.¹⁴⁵

7.8.3 Recent housing completions illustrate that the level of housing development in recent years is insufficient to deliver the change required. This shows that annual completions have varied in the town from a high of 683 dwellings in 97/98 to 96 dwellings in 2003/4.¹⁴⁶ Housing completions will need to increase to meet the needs of the district's growing population.

Need arising from demographic change

7.8.4 Harlow's population is expected to grow by 14,036 people over the next plan period (2011 - 2031). As such, demographic change gives rise to a forecast need for 7,500 additional dwellings in Harlow (375 per year).¹⁴⁷

N.B. New population projection data¹⁴⁸ may become available in the near future; however, it is unlikely to tell a significantly different story to that which is understood at the current time.

Need arising due to affordability issues

7.8.5 Housing need is also driven by the issues relating to affordability. A Strategic Housing Market Assessment (SHMA) study has highlighted that property prices in Harlow have increased by at least 150% between 2000 and 2012. Furthermore, the ratio between median full time earnings to average house prices increased from 6.4 to 7.9 between 2002 and 2011. The disparity between wages and the cost of homes in the area is likely to grow over the plan period.¹⁴⁹ Indeed, the SHMA concludes that there will be a growing demand for more social-rented accommodation in Harlow over the next 20 years. This conclusion is backed-up by analysis of the income distribution of non-homeowners, which reveals that over 55% of all non-homeowners in Harlow have incomes of less than £15,000 per annum and these households can realistically afford no more than Social Rent.¹⁵⁰ This compares with 46% of all non-homeowners in East Hertfordshire, 47% in Epping Forest and 47% in Uttlesford.¹⁵¹

¹⁴³ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹⁴⁴ The ratio between average earnings and average house prices, indexed to the England and Wales average.

¹⁴⁵ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹⁴⁶ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹⁴⁷ The Greater Essex Demographic Forecasts Study (Phase 4), which was commissioned by the Council and 23 other local authorities in Essex, Hertfordshire, Suffolk and Cambridgeshire, forecasts that

¹⁴⁸ Phase 5 of the Demographic Forecasts Study

¹⁴⁹ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

¹⁵⁰ i.e. these households would need assistance such as housing benefit before they would be able to meet the cost of Affordable Rents

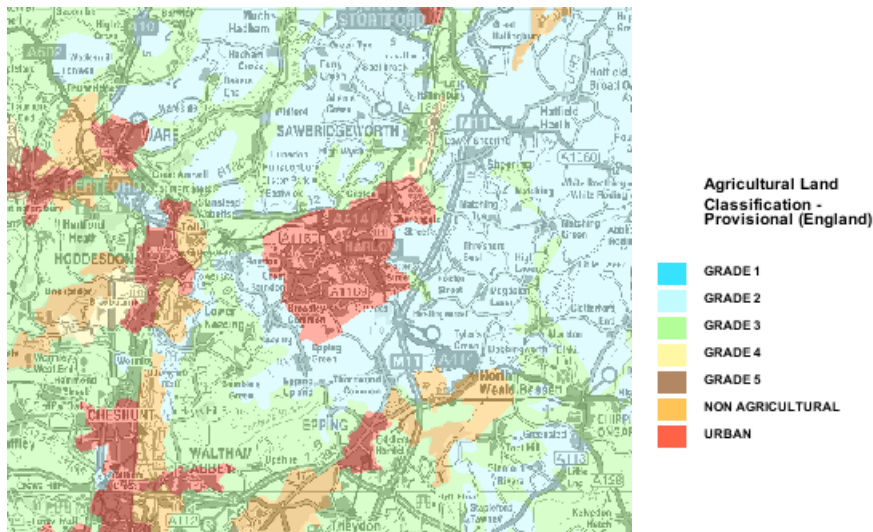
¹⁵¹ Opinion Research Services (2013) LCB East SHMA Update 2012 [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/London%20Commuter%20Belt%20Sub-region%20Strategic%20Housing%20Market%20Assessment%20Update%202012.pdf> (accessed 02/2014)

7.8.6 Given that the Council's evidence on viability suggests that affordable housing may comprise as little as 10% - 15% of total housing delivered by the private sector, it is the case that if affordable housing needs are to be met there will be a need to increase the total amount of housing delivered in Harlow. The Council considers that 12,000 dwellings between 2011 and 2031 to deliver the full need for market and affordable homes.

7.9 Land

7.9.1 There are relatively few areas of Harlow still in agricultural use.¹⁵² However, the periphery of the district and the neighbouring areas contain land of a fairly high agricultural quality (Grade 2 and Grade 3) and are of a traditional farmland character.

Figure 7-6 Agricultural Land Classification



7.9.2 The most recent figures show that between 2007 and 2011, 100% of employment development was built on previously developed land. In terms of residential development, 72% was built on previously developed land in 2010–2011 which is a 3% increase on the 2007–2008 figure.¹⁵³

7.9.3 The majority of land occupied by the town of Harlow was previously used for agriculture. Industrial development since 1947 has been concentrated in areas which are still used for that purpose. This is likely to diminish the likelihood of harm arising from any contamination which may be present.⁷⁹

7.10 Landscape

7.10.1 Harlow is a former new town, conceived in the 1940s in response to the need for housing arising from wartime destruction in London and the south east.

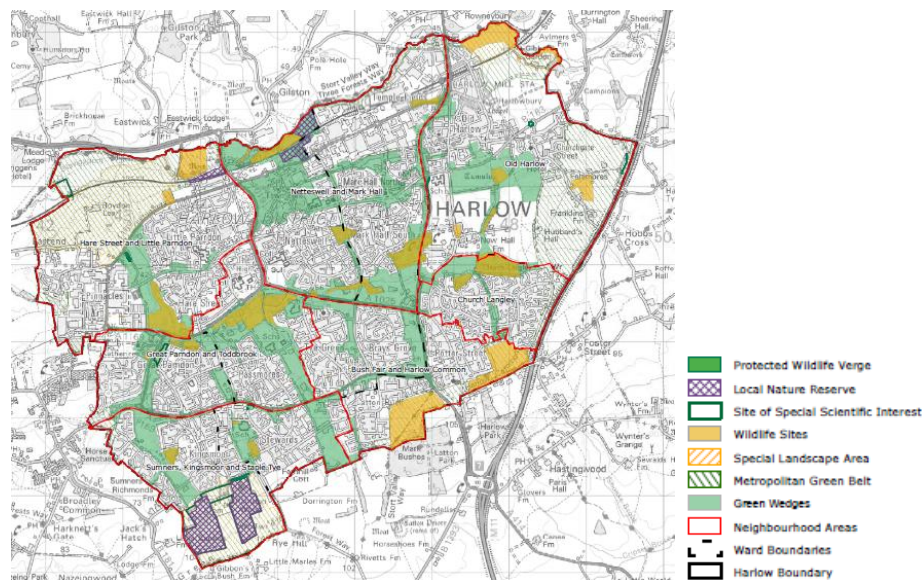
7.10.2 Harlow's Green Wedges were prominent in the 1952 Gibberd Masterplan and are integral features of the town today. The Council, through the Harlow Spatial Options Study (2013) considered whether the neighbourhood structure/Green Wedge form should be redefined, but concluded that a significant redefinition of Harlow's Green Wedges would not be appropriate given their importance to Harlow's urban form and structure. However, a subsequent Green Wedge Review identified a number of locations where the boundaries of the green wedges could be amended or redefined.

¹⁵² Harlow District Council (2006) Adopted Replacement Harlow Local Plan [online] Available at: <http://www.harlow.gov.uk/arhlp> (accessed 03/2014)

¹⁵³ Harlow District Council (2011) Annual Monitoring Report 2010-2011 [online] Available at: <http://www.harlow.gov.uk/amr> (accessed 03/2014)

- 7.10.3 Harlow is a relatively compact district at just over 30km² and is divided into seven 'Neighbourhood Areas' as shown in Figure 7-7 below. The town is defined by a distinctive landscape setting created by the ridges and valleys associated with the principal valleys and tributaries of the Stort to the north and the Lee, to the west. The town also incorporates a number of small parklands and estates, retaining relics of these within the urban green space network; for example Mark Hall Park and parts of the landscape associated with Parndon Hall, in addition to several historic villages.¹⁵⁴
- 7.10.4 Approximately 53% of Harlow is classified as green space; this is marginally higher than Castle Point (51%) which has the lowest proportion of green space of all the Essex local authority areas, and significantly lower than Uttlesford, which with 93% of its area designated as green space, has the highest proportion of its land classified as green space in Essex.¹⁵⁵
- 7.10.5 Just under 21% (640 hectares) of Harlow falls within the Metropolitan Green Belt.¹⁵⁶
- 7.10.6 There are three areas designated as Special Landscape Areas, which are areas that have a 'special visual quality that distinguishes them from other tracts of countryside'.¹⁵⁴ These are located in the north-western corner, south-western corner and north-eastern corners of the district and fall within designated Green Belt land.
- 7.10.7 Harlow has excellent provision of open space which is a valuable and distinctive feature of the town, however some spaces are underused and of poor quality. When the town was planned emphasis was placed on using open spaces to creating a separating effect between different uses; in contrast, contemporary planning is more focused on creating spaces that are multifunctional (i.e. a recreational and ecological resource).¹⁵⁷
- 7.10.8 Figure 7-7 below presents the open space designations in the district.

Figure 7-7: Open Space Designations



¹⁵⁴ Land Use Consultants (2013) Harlow Open Space and Green Infrastructure Study [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/Harlow%20Open%20Space%20and%20Green%20Infrastructure%20Study%20Part%201%20-%20Chapter%201%20to%205.pdf> (accessed 02/2014)

¹⁵⁵ NHS North Essex (2012) Local Authority Portrait Series - Harlow [online] Available at: <http://www.essexinsight.org.uk/Resource.aspx?ResourceID=381> (accessed 03/2014)

¹⁵⁶ DCLG (2014) Local authority green belt statistics for England: 2012 to 2013 [online] Available at: <https://www.gov.uk/government/publications/local-authority-green-belt-statistics-for-england-2012-to-2013> (accessed 03/2014)

¹⁵⁷ Harlow District Council (2014) Harlow Local Development Plan: Emerging Strategy and Further Options

- 7.10.9 The Harlow Open Space and Green Infrastructure Study¹⁶⁰ provides an overview of the quantity, quality and accessibility of open space in the district.
- 7.10.10 There are 57 Parks and Gardens in Harlow, totalling almost 180 hectares. Of these one (Town Park – 37.48 hectares) is classified as a District Park, and the remaining 56 are all classed as Local Parks and Gardens.
- 7.10.11 Town Park is freely accessible to the public and provides a range of facilities and features offering recreational, ecological, landscape, cultural and green infrastructure benefits. It provides facilities for community events as well as formal play areas and it contains community facilities including Pets Corner.¹⁶⁰
- 7.10.12 Local Parks and Gardens provide key facilities for the surrounding communities and are distributed fairly evenly throughout the district, although there is slightly better provision in the centre and west of the district, than in the two Neighbourhood Areas to the East (Church Langley and Old Harlow). However, central/southern Church Langley, southern parts of Old Harlow and the employment areas are outside of the 400m catchment for local parks and gardens.¹⁶⁰
- 7.10.13 There are 64 natural green spaces in Harlow. Seven of these are classified as district-scale and 57 classified as local-scale. The primary purpose for natural spaces is to support a range of habitats and promote access to nature.¹⁶⁰
- 7.10.14 The district is well provided for in terms of access to district Natural and Semi-Natural Green Space with no part of the town being more than 3.2km from district provision. The existing provision also provides accessible sites for considerable areas beyond the district boundary into the surrounding villages.¹⁶⁰
- 7.10.15 The Stort Valley, to the north of Harlow, was highlighted as a key Green Infrastructure asset in the now revoked 2008 East of England Plan and the Regional Economic Strategy¹⁵⁸ as well as the 2005 Green Infrastructure Plan for Harlow, which defined a number of project areas, among which was the Stort Riverpark project area¹⁵⁹. The Stort Valley is also recognised as an example of good quality and valued open space in the 2013 Harlow Open Space and Green Infrastructure Study¹⁶⁰. The Stort Valley was the subject of a specific feasibility study¹⁶¹, which set out a concept plan for the area to create physical links with the Lee Valley Regional Park at the river confluence at Great Amwell. Some aspects of the project and companion projects have since been delivered, principally in the form of access and signage improvements, creation of the Stort Valley Path, and areas of wetland habitat enhancement and creation in the valley.¹⁶⁰

¹⁵⁸ Natural England (2009) Investing in the East of England's natural assets: state, value and vision [online] Available at: <http://publications.naturalengland.org.uk/publication/54001> (accessed 02/2014)

¹⁵⁹ Chris Blandford Associates (2005) A Green Infrastructure Plan for the Harlow area [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Green%20Infrastructure%20Plan%20for%20the%20Harlow%20Area.pdf> (accessed 03/2014)

¹⁶⁰ Land Use Consultants (2013) Harlow Open Space and Green Infrastructure Study [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/Harlow%20Open%20Space%20and%20Green%20Infrastructure%20Study%20Part%201%20-%20Chapter%201%20to%205.pdf> (accessed 02/2014)

¹⁶¹ The Landscape Partnership (2007) Stort Valley Feasibility Study [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Stort%20Valley%20Feasibility%20Study.pdf> (accessed 03/2014)

7.11 Transport

- 7.11.1 Of 408 districts, Harlow is ranked 22nd in terms of its overall connectivity score¹⁶². Although Harlow is considered to have a reasonable level of infrastructure provision to facilitate travel by sustainable modes, there is still a high dependency on the private car. In Harlow 47.6% of people travelled to work by car compared to a national average of 40.4% in 2011. The proportion of residents who travel to work by public transport stands at 5.6%, below the national level of 7.24%. The proportion of residents travelling by foot or bicycle is 9.1%, slightly above the national average of 8.8%.¹⁶³
- 7.11.2 Harlow experiences regular instances of severe traffic congestion at key points along its internal highway network, particularly during the weekday and weekend peak hours. In particular the A414 experiences heavy traffic flows and resulting congestion along its entire length. This congestion occurs due to high demand for movements both within Harlow from the residential areas to the main employment areas, town centre and the railway stations.¹⁶⁴
- 7.11.3 A number of junctions are operating close to capacity or in excess of their original design thresholds. At the strategic level Harlow's road network is arbitrary with roads and streets often 'going nowhere'. At the finer grained level street and estate layouts are such that car parking provision is inadequate. Consequently, the ability of the transport system to accommodate growth has emerged as one of the single biggest risk factors to accommodating the level of development in Harlow.¹⁶⁵
- 7.11.4 Harlow forms part of a wider network of towns that extend across Essex and Hertfordshire forming an arc of settlements around London. These centres provide a range of services, facilities, employment and housing with complex interactions and movement patterns between these settlements, to and from London and elsewhere. To the east of town is the M11 motorway which is a key north-south route linking London and key urban centres north before reaching Cambridge. The M25 (3 miles to the south of Harlow) provides access to other parts of London and the wider south east. Approximately 10 miles north of Harlow is Stansted Airport. Adjoining the town to the south, east and west is Epping Forest District. Both districts are predominately rural but contain a number of towns and villages.
- 7.11.5 Although there are a number of planned improvements to the road network to support committed development schemes in Harlow (Newhall, the Harlow Enterprise Zone and the Gilden Way development) the Council's evidence shows that junction 7 on the M11 is operating very close to its planned capacity and that any significant growth (housing and employment) in the Harlow area will cause the junction to exceed this capacity. Therefore, a new junction on the M11 (Junction 7a) has been identified as fundamental to the delivery of growth in and around the town.

7.12 Water

- 7.12.1 Harlow is located within the Thames River Basin District and the Thames River Catchment Area. The River Stort is the only major river running through the district and runs east-west along its northern boundary. Throughout its length in Harlow the river is canalised and is navigable.

¹⁶² The connectivity index is based on proximity to and number of major transport services. Harlow scores 320.7 on this index. Figures over 100 indicate a higher than average level of connectivity.

¹⁶³ Local Futures (2013) District Profile: An Economic, Social and Environmental Summary Profile of Harlow [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Place%20Profile%202013.pdf> (accessed 03/2014)

¹⁶⁴ Atkins (2008) Harlow Infrastructure Study Stage 1 - Final Report [online] Available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Infrastructure%20Study%20-%20%20Stage%201%20Report.pdf> (accessed 02/2014)

¹⁶⁵ Harlow District Council (2014) Harlow Local Development Plan – Emerging Strategy and Further Options

- 7.12.2 Harlow falls within the River Stort catchment area. This is indicated by a strong ridge line to the south which forms the southern boundary of the built up area. Within Harlow the streams and other drainage features flow north through the town towards the River Stort. The watercourses run largely through open spaces and undeveloped parkland.³⁵
- 7.12.3 Since the flood of 1947, the town's development has to a great extent ameliorated the potential flooding in the town. Although there have been several floods since, the most recent being in 2002, they have mostly been confined to the functional flood plain.³⁵
- 7.12.4 In terms of flood risk management, the River Stort has defences along the north and south banks stretching from Honeymead Marsh to Harlow Mill and beyond towards Sawbridgeworth. From Fiddlers Brook west towards the Moorhen the defences are on the south bank and surround the Moorhen public house and marina. Defences continue along the north bank of the navigation to Parndon Lock where the navigation meets the river again.

8 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS?

8.1 Introduction

8.1.1 Drawing on the review of the sustainability context and baseline, the 2010 Scoping Report identified a list of sustainability issues / objectives that should be drawn upon as a methodological 'framework' for the appraisal. These are listed below (in a slightly updated form) under 'topic' headings.

Air quality

- To ensure that the Air Quality in Harlow remains below objective limits and continues to improve.

Biodiversity and green infrastructure

- To conserve and enhance biodiversity in Harlow.
- To promote, enhance and strategically expand the district's network of green infrastructure.

Climate change

- To lower Greenhouse Gas (GHG) emissions.
- To increase the amount of energy generated by decentralised or renewable sources and the use of renewable sources of energy by new development.
- To minimise the impact of development on surface water flooding and avoid development within areas of flood risk.

Community and wellbeing

- To reduce poverty and social exclusion.
- To meet the health and social care needs of the district's growing and ageing population and its disabled population.
- To encourage healthy lifestyles and reduce inequalities in health, particularly through reducing obesity and diabetes.
- To reduce levels of crime, particularly Criminal Damage and Arson and Vehicle Offence crimes.
- To renew the district's deprived neighbourhoods and address poor public realm within and around residential areas to ensure that pedestrian routes are integrated with areas of activity.

Economy and employment

- To reduce a mismatch between jobs and skills by improving levels of skills, training and qualifications within the district.
- To ensure that job creation is matched by the provision of appropriate facilities and infrastructure.
- To promote investment, develop an attractive employment base and create a diversified economy within the district through avoiding the dominance of a few large employers and encouraging the 'clustering' of businesses within existing locations.
- To regenerate the town centre through upgrading the level of retail provision, encouraging a broader mix of uses including residential, introducing a high quality public realm and restructuring centres to increase passing traffic and overcome accessibility issues.

Historic environment

- To protect the district's historic environmental assets from inappropriate development.
- To ensure that development respects the character, appearance and features of historical designations, in addition to the setting and views into or out of these areas.
- 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.
- To promote the creation of quality streets and spaces whilst protecting the town's distinctive character and heritage.

Housing

- To increase the provision of housing, particularly affordable housing, to ensure that appropriate levels of new dwellings are provided over the plan period.
- To diversify the housing stock, increase density and address poor public realm within and around residential areas.
- To ensure that the housing needs of an ageing (and disabled) population are met.

Land

- To support efficient use of land, including development of previously developed land in the district.
- To support the remediation of contaminated land.

Landscape

- To ensure that development takes into account the Green Belt and Green Wedges that characterise the district.
- To ensure that the district's landscape assets are protected and integrated to maximise their potential amenity value, particularly in greenfield areas.

Transport

- To promote a more sustainable modal shift so that levels of private car use for commuting are reduced.
- To promote measures that integrate transport and land use planning in order to provide for the greatest possible increase in passenger transport uptake as well as implementing enhanced access to the M11 through a new junction.

Water

- Given that Harlow is located in an area of serious water stress which will be exacerbated due to climate change and future growth and development, water efficiency measures should be sought, including through the promotion of SuDS.
- To encourage reduced per capita consumption of water and maintain high levels of drinking water quality.
- To maintain and improve the water quality of Harlow's water courses in line with the Water Framework Directive requirements.
- To ensure the distribution and location of new development takes the water supply and sewerage infrastructure into account.

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

9 INTRODUCTION (TO PART 2)

- 9.1.1 The aim of this Part of the Interim SA Report is simply to provide ‘outline reasons’ for selecting the alternative spatial strategies that are a focus of appraisal consultation at the current time (i.e. are appraised within Part 3 of this Interim SA Report).
- 9.1.2 Within the SA Report published for consultation alongside the draft plan it will be possible (indeed essential) to tell a more detailed ‘story’ about the interaction between plan-making and SA that has preceded and influenced the preparation of the draft plan - see **Box 9.1**.

Box 9.1: Information that will be presented in Part 2 of the SA Report

In answering the question ‘What has plan-making / SA involved up to this point?’ Part 2 of the SA Report – i.e. the document published for consultation alongside the draft plan – will present:

- Outline reasons¹⁶⁶ for selecting the alternatives that were a focus of appraisal prior to the draft plan being prepared; and
- Outline reasons for selecting the preferred (draft plan) approach subsequent to and in-light of the alternatives / site options appraisal.

10 SELECTING SPATIAL STRATEGY ALTERNATIVES

- 10.1.1 The process identifying spatial strategy alternatives necessitated consideration of both ‘top-down’ (i.e. strategic) and ‘bottom-up’ options.

10.2 Consideration of top-down options (1): District-wide growth quantum

- 10.2.1 On the basis of evidence gathered in relation to housing need (through a Strategic Housing Market Assessment, SHMA), employment requirements (through an Employment Land Review) and retail requirements (through a retail study) the Council was able to identify the following options:

Name		Numbers	Description
A	Do Nothing More	+3,929 dwellings and -1,207 jobs	This option assumes that no more housing is built in Harlow other than those developments which benefit from planning permission
B	Meeting Development Needs	+7,485 dwellings and + 3,057 jobs	This option reflects the demographic modelling undertaken by the Greater Essex Demographic Forecast Study but updated to take into account the latest data on household formation rates from Government.
C	Jobs Led	+8,060 jobs and +11,490 dwellings	This option looks to provide enough jobs in Harlow to meet the town’s economic aspirations (including capturing the jobs lost during the recession). The level of housing is set to ensure sufficient people of working age.
D	Growing Centre	+15,000 dwellings and +12,099 jobs	This option assesses the approximate level of development set out in the East of England Plan
E	Transformed Centre	+20,000 dwellings and +18,121 jobs	This option is based upon sufficient growth to support a ‘transformed’ Harlow town centre to provide a transformed retail and leisure offer.

¹⁶⁶ In-line with the Regulations, the SA Report must explain ‘outline reasons for selecting the alternatives dealt with’

- 10.2.2 The Council commissioned **The Harlow Future Prospects Study: Linking Regeneration and Growth** to assess the implications of each scenario. The study considered the implications for population growth, age structure, labour force changes and household changes. It also assessed the economic outcomes of each option on jobs growth, business growth, household spending change, jobs growth, business growth and business rates. Finally, the likely regeneration outcome that each growth option offered was assessed.¹⁶⁷
- 10.2.3 Each option has different implications for Harlow ranging from the continued stagnation and eventual decline of the town up to a transformed town under the highest level of growth. Options A and B fail to provide sufficient growth to deliver a wide number of key objectives for Harlow whereas Options E and D, and to a lesser extent Option C, provide a critical mass that would deliver a wide range of the Council's Corporate objectives. In regeneration and economic benefit terms a greater level of growth would give Harlow the best possible platform to secure prosperity and tackle deprivation across the whole range of themes.
- 10.2.4 The five options were also subjected to **Sustainability Appraisal**, i.e. assessed in terms of the SA Framework (see Part 1, above). Table 10-1 presents appraisal findings.

Table 10-1 Appraisal findings: District-wide growth quantum alternatives

Discussion

- Option A** - would lead to minimal pressure on Green Wedges and Green Belt land surrounding Harlow, indeed it would likely be the case that greenfield development could be avoided leading to **significant positive effects** in terms of the land topic and a strong performance in terms of other environmental topics. It is also assumed that this approach would perform best in terms of traffic congestion related objectives (and, as such, the air quality objective). Given the low levels of housing and employment proposed, this option would not enable the district to meet its objectively assessed needs and may lead to a decline in the school age population, resulting in services facing cut-backs. Consequently this option is likely to result in **significant negative effects** in terms of the housing and economy / employment related objectives, and worsening effects in terms of affordable housing and community and well-being related issues.
- Option B** - would result in more housing and employment provision than Option A, but would only provide 60% of the affordable housing needed to meet the district's objectively assessed needs, and would fail to deliver a net gain in jobs growth between 2008 and 2031. Consequently this option would result in **significant negative effects** in terms of housing and economy / employment related objectives. Furthermore, the level of growth proposed under this option would not be sufficient to create a catalyst for widespread investment in regenerating the town centre, thus resulting in limited positive change in terms of the community and well-being objectives. Although the majority of growth would be accommodated within Harlow's administrative area it would require greenfield development which would lead to **significant negative effects** in terms of the land topic.
- Option C** - would result in a significant increase in housing provision which would be of a level that would meet the district's objectively assessed needs. This option would also allow for an expanded labour force that would help to support the wider regeneration of Harlow, and a population that would support an enhanced education offer in the town. Consequently this option would result in **significant positive effects** in terms of the housing and economy / employment objectives. Under this option, the approach to increased housing and employment provision would require significant development in and around Harlow, including on green belt land which would lead to **significant negative effects** in terms of the land topic. It should be noted that this approach would be depended upon the agreement of some housing provision being provided in adjoining districts.
- Option D** – like Option C, this option would result in a significant increase in housing provision; however it would be of a level that would exceed the objectively assessed housing needs for the district. The approach offers the potential for larger developments to create new sustainable

¹⁶⁷ NLP (2013) The Harlow Future Prospects Study: Linking Regeneration and Growth [online] available at: <http://www.harlow.gov.uk/sites/harlow.gov.uk/files/documents/files/Harlow%20Future%20Prospects%20Study%20%E2%80%93%2013.pdf> (accessed 03/14)

communities that would create the demand for new local services and facilities. In light of this, the approach is likely to result in substantial regeneration benefits therefore leading to **significant positive effects** for the district in the long term in terms of the housing and community and well-being related objectives. However, this option would require significant development in and around Harlow including on Green Belt land, thereby resulting in **significant negative effects** in terms of the land and landscape related objectives. The option Would be dependent upon the agreement of some provision being provided in adjoining districts and would also require significant upgrades to the local and strategic road network to accommodate growth.

- **Option E** - would result in the greatest increase in housing provision, including affordable housing, and the greatest increase in job creation, of all the options presented. As a result this option is likely to deliver multiple regeneration benefits to the district, attract greater levels of investment, and create a step change in economic growth, thereby resulting in **significant positive effects** in terms of the housing, economy / employment and community and well-being related objectives. However this approach would require substantial development in and around Harlow including on Green Belt land and would be dependent upon the agreement of some provision being provided in adjoining districts. In light of this, this option is expected to result in the most **significant negative effects** in terms of the land and landscape related objectives. This option would also require significant upgrades to be made to the local and strategic road network to accommodate growth, which would be of a level that would potentially not be realistically deliverable within the plan period.

10.2.5 In-light of the analysis/appraisal described above, the Council was able to determine that two options should be taken forward for further consideration, i.e. should be reflected in the district-wide spatial strategy alternatives:

- Option C - Jobs Led
- Option D - Growing Centre

10.2.6 A key consideration is need (as established by the NPPF) to develop a positive strategy which meets the objectively assessed housing needs of the area. Careful regard was also given to local priorities for economic growth and regeneration set out in the Council's Corporate Plan and by the South East Local Enterprise Partnership. For these reasons, the lower growth options (A and B) were dismissed as 'unreasonable'. Option E was also dismissed as unreasonable on the basis that growth in excess of 15,000 dwellings would be difficult to achieve within the plan period (2011 to 2031) due to the anticipated time and costs of delivering the necessary supporting infrastructure.

10.3 Consideration of top-down options (2): Broad options for accommodating growth

10.3.1 Previously the Council had been required to implement the development strategy for Harlow as set out in the East of England Plan. This specified that approximately 5,000 dwellings should be accommodated within Harlow and 11,000 dwellings accommodated outside Harlow in adjoining districts, including 10,000 dwellings beyond the northern boundary of Harlow, in East Hertfordshire district.

10.3.2 However, in late 2010 / early 2011 the Government put in motion the process of abolishing the East of England plan, and at the same time the Council published the Core Strategy Issues and Options consultation document. Many of those responding to this consultation questioned a number of aspects in particular that 16,000 new dwellings would help deliver the regeneration of the town. In addition the proposal that 10,000 dwellings should be accommodated to the north of the Harlow was challenged.

- 10.3.3 The Council considers that in order to meet Harlow’s objectively assessed development needs for market and affordable housing, 12,000 dwellings will need to be delivered between 2011 and 2031. However, to secure substantial regeneration benefits 15,000 dwellings and beyond will be required. The Council considers that growth in excess of 15,000 dwellings would be difficult to achieve within the plan period due to the anticipated time and costs of delivering the necessary supporting infrastructure.
- 10.3.4 The Council is now consulting on a growth target of between 12,000 and 15,000 (600 and 750 d.p.a.) new dwellings and 8,000 to 12,000 jobs (400 and 600 new jobs p.a.) over the plan period. The Council considers that this quantum of development will enable the district to meet its objectively assessed needs and provide a positive platform to deliver its regeneration objectives.
- 10.3.5 The Council’s current position is that there are **five** broad options for accommodating growth in and around Harlow –
- **An option focused on priority regeneration areas**, with growth focused to the west and south of Harlow, both within and beyond the existing urban area. The town centre would also be a focus. An urban extension to the north might also fit with this approach, but an urban extension to the east (beyond that already committed) would not.
 - **An environmental / landscape led option**, with less focus on the urban area (in order to retain existing features and principles), a major urban extension to the east (into Epping Forest District) and a lesser extension to the south. An urban extension to the south west might also fit with this approach, but an extension to the north would not.
 - **A passenger transport led option**, with urban extensions to the north and east (only as far as the Harlow / Epping Forest boundary), i.e. in areas with better access to railway stations. The town centre would also be a focus. Growth to the south and west would be avoided.
 - **An option that is both regeneration and landscape led**, with growth focused to the south west of Harlow, both within and beyond the existing urban area, and a major urban extension to the east (into Epping Forest District). The town centre would also be a focus. An urban extension to the west could also fit with this approach, but an extension to the north or south would not.
 - **A northern bypass led option**, with a major urban extension to the east (into Epping Forest District) and a major urban extension to the north of Harlow. The town centre would also be a focus. This approach would help the case for a new northern bypass linking a new Junction 7a to the urban extensions.
- 10.3.6 All of the broad options with the exception of the fifth option involve two variations in approach, with Options 1 – 4 comprising an ‘Option a’ and an ‘Option b’, whereby the ‘a’ options comprise lower growth strategies and the ‘b’ options comprise higher growth strategies. In light of this the appraisal in Part 3 considers the relative merits of nine alternative spatial growth options for the district. Table 12-1 presents a summary of the key aspects of each of the alternative options.
- 10.4 Consideration of bottom-up (i.e. site specific) options**
- 10.4.1 The Council undertook a detailed appraisal of the sites using a bespoke criteria-based methodology to identify ‘reasonable’ (or ‘potentially suitable’) site options. The criteria was developed to reflect the SA framework (see **Appendix 1** for a discussion of the links between the criteria-based methodology and the SA framework).
- 10.4.2 The first task of the appraisal process involved defining sites / areas for assessment. The survey area was therefore divided into:
- Land within the existing urban envelope of Harlow; and

- Land outside the existing urban envelope of Harlow.

- 10.4.3 Areas within the district were assigned individual site reference numbers based on those included in the Strategic Housing Land Availability Assessment (SHLAA), while areas outside the urban envelope of Harlow were based on Spatial Land Areas (SLAs) identified in previous assessments.
- 10.4.4 The assessment process comprised two key stages: the first involved a sieving process ('Sieve 1 – 3') to assess the **suitability** of the sites, while the second involved an assessment of the **developability** of potentially suitable sites.
- 10.4.5 In terms of determining the **suitability** of the sites, Sieve 1 involved the sites being assessed against a set of 'exclusionary criteria' which was used to eliminate sites on the basis of environmental designations / considerations. Sites affected by these designations were not considered further. Sieve 2 involved the remaining sites being assessed against a set of 'discretionary criteria', which encompassed a range of considerations including: socio-economic, passenger transportation, local facilities and services, other environmental and infrastructure capacity. For some of the considerations different distance criteria was applied between those sites within the urban envelope of Harlow and those outside of it.
- 10.4.6 All sites that were assessed against the Sieve 2 criteria were also assessed against the Sieve 3 ('opportunity') criteria whereby the sites were assessed against considerations relating to: priority areas and on-going regeneration activities; opportunities to revitalise centres; opportunities for local public realm improvements; and open space revitalisation. The purpose of passing the sites through the Discretionary and Opportunity Criteria was to develop further information on the relative performance of the sites against further considerations.
- 10.4.7 The second stage of the assessment process involved the **developability** of the sites being assessed (i.e. where there is a reasonable prospect that the site is available and could be viably developed at the point envisaged). This assessment was taken from the SHLAA. The SHLAA concluded that there is sufficient developable land in Harlow District to accommodate 8,886 dwellings. When dwellings that have planning permission (4,027) and those that have been completed since 2011 (541) are removed from the overall figure, Harlow is identified as having the capacity to accommodate 4,318 new dwellings.
- 10.4.8 For further details of the assessment process, reference should be made to the Council's Technical Report on Generating and Testing Spatial Options, which is available at: <http://www.harlow.gov.uk/local-plan>

10.5 Drawing on 'top-down' and 'bottom-up' understanding to identify spatial strategy alternatives

- 10.5.1 Using the 59 sites identified through the assessment process, the Council generated the **five** broad options set out in Section 10.3.5 for accommodating growth in and around Harlow. The options reflect alternate policy objectives for Harlow and therefore set out different spatial approaches. However, all five options are 'reasonable' in that they would potentially deliver the following key development principles for Harlow:
- Each provides for Harlow's **identified development requirement** of between 12,000 & 15,000 new dwellings; and
 - Each reflects the **Harlow Development Principles**, namely: continuing a compact town; maintaining the neighbourhood and green wedge structure; and sequencing development to maximise previous developed land first, then appropriate open spaces, and finally the green belt.
- 10.5.2 Figure 10-1 to Figure 10-5 overleaf present the alternative spatial options.

Figure 10-1: Priority regeneration area focused (Options 1a and 1b)



Figure 10-2: Environmental / landscape led (Options 2a and 2b)

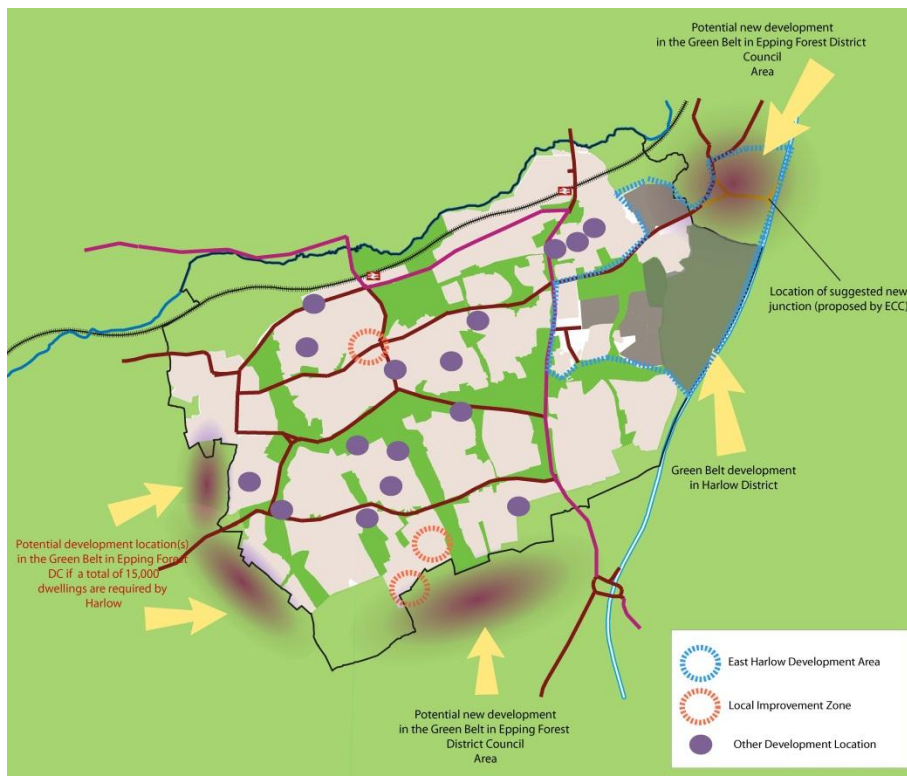


Figure 10-3: Passenger transport led (Options 3a and 3b)



Figure 10-4: Regeneration and landscape led (Options 4a and 4b)



Figure 10-5: Northern bypass led (Option 5)



PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?

11 INTRODUCTION (TO PART 3)

11.1.1 The primary aim of this 'Part' of the SA Report is to present appraisal findings in relation to the nine spatial strategy alternatives introduced above (in Part 2).

12 APPRAISAL OF ALTERNATIVES

12.1 Methodology

12.1.1 For each of the options, the appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability issues and objectives identified through scoping (see Part 1) as a methodological framework.

12.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.¹⁶⁸

12.1.3 Because of the uncertainties involved there is inevitably a need to make assumptions. Assumptions are made cautiously, and explained within the text.¹⁶⁹ The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist.

12.1.4 In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms. This is helpful, as it enables a distinction to be made between alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

12.1.5 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹⁷⁰ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the appraisal as appropriate.

12.2 Appraisal findings

12.2.1 Table 12-1 presents the alternative strategies and Table 12-2 presents the appraisal findings. Table 12-2 ranks the options in terms of each of the sustainability topics and uses shading to classify options in terms of significant effects where appropriate.

¹⁶⁸ The implication being that it is difficult, if not impossible, to identify a 'cause effect relationship' with any certainty.

¹⁶⁹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pageId=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification"

¹⁷⁰ Environmental Assessment of Plans and Programmes Regulations 2004

Table 12-1 Alternative spatial strategies

Alternative spatial strategies	
1a	Focused on Priority Regeneration Areas providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
1b	As per 1a plus additional growth to the west and south of the district and to the north of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
2a	Environmental Constraints Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
2b	As per 2a plus additional growth to the south west and north east of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
3a	Passenger Transport Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
3b	As per 3a plus additional growth to the north of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
4a	Regeneration and Landscape Led providing approximately 12,000 dwellings and 8,000 jobs in and around Harlow
4b	As per 4a plus additional growth to the west and north east of Harlow providing approximately 15,000 dwellings and 12,000 jobs in and around Harlow
5	Northern Bypass Led Option providing approximately 20,000 dwellings and 18,121 jobs in and around Harlow

Table 12-2 Appraisal findings: Alternative spatial strategies

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Air Quality	<p>There are no Air Quality Management Areas designated in Harlow, however traffic emissions are identified as being the most significant source of air pollution in the district. By increasing housing and employment provision in the district, all nine options would put increased pressure on transport routes and would increase energy consumption thus generating increased carbon emissions. All options are therefore expected to result in some negative effects in terms of the objective.</p> <p>In terms of their relative merits, the options that are likely to promote greater use of sustainable modes of transport are expected to have the most positive effects in terms of improving air quality in the district.</p> <p>By directing the majority of new development to urban areas where opportunities for passenger transport uptake are highest (e.g. to the northern and eastern parts of Harlow which have good access to railway stations, as well as the town centre which is a key passenger transport and service hub), Option 3a is expected to have the most significant positive effects in terms of air quality. This is due to this option being considered likely to lead to increases in passenger transport uptake as well as a reduction in the reliance on private car use, thus resulting in less car emissions.</p> <p>Option 5 is likely to lead to the highest level of growth (both in terms of housing and employment) through promoting development in and around the town centre and directing significant levels of growth to greenfield sites within and outside the district. While a bypass is not part of the Local Plan, it is likely that a bypass would be required in the north of the district to deliver this option. This option is considered most likely to increase car use, congestion, and consequently GHG emissions in the district; therefore it is considered to perform least favourably in terms of the air quality objective.</p> <p>Option 2b would direct significant levels of housing development to the southern edges of the district, where public transport accessibility is currently relatively poor. This approach would require significant investment in passenger transport provision in order to ensure the development is linked with the town centre and other passenger transport hubs.</p>	3	4	3	4	1	2	3	4	5

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Biodiversity and green infrastructure	<p>In general, the higher the quantum of development, the greater the land take, subject to factors such as design and density. Consequently the options proposing higher levels of development on greenfield land could, in theory, be expected to result in the greatest loss of biodiversity. However, whilst most land has some importance for biodiversity (including gardens, roadside verges and riverside in towns and villages) not all greenfield land has the same importance for biodiversity. Land with biodiversity designations is clearly more important in terms of biodiversity than land without such designations, particularly international (such as the Epping Forest and Broxbourne Woods Special Areas of Conservation (SAC)) and national designations (such as the Harlow Woods and Parndon Wood Sites of Special Scientific Interest (SSSI)). The options that would have most impact on these areas, mainly due to proximity are therefore likely to have the greatest impacts on biodiversity.</p> <p>Option 1a proposes the least amount of growth overall and would focus the majority of new development on previously developed land within the existing urban area. This approach would limit the amount of development on greenfield land, and avoid designated areas, thus helping to conserve and enhance biodiversity. However it should be noted that brownfield sites, particularly those that have been vacant for several years, are often also rich in biodiversity and home to protected species.</p>									
		★ 1	3	2	3	2	3	2	3	3

	<p>By focusing growth within the urban parts of the district as well as to the east of the town where there are fewer local level biodiversity designations and no national or international designations, Options 2a, 3a and 4a are predicted to have fewer effects on the district's biodiversity and are therefore considered to perform more favourably in terms of the biodiversity and green infrastructure objectives after Option 1a.</p> <p>Options 1b and 2b would direct a significant amount of growth to the south and south west of the town, which would be in close proximity to the Harlow Woods SSSI and Mark Bushes Wood LoWS; this is considered to have the potential to lead to increased recreational use at these sites which could result in potentially significant negative effects. In addition Option 1b would direct growth to the north of Harlow which would be in proximity to the Hunsdon Mead SSSI; it is considered that recreational activities in the area could result in damage to important plant species, thereby resulting in further potentially significant negative effects in terms of the biodiversity objectives.</p> <p>Option 3b and 5 propose significant growth to the north of Harlow, some of which falls within Green Belt land. Given that the Hunsdon Mead SSSI falls within this area, these options may potentially result in significant negative effects in terms of biodiversity.</p> <p>Option 4b proposes significant growth to the south west of the town, which would be in close proximity to the Harlow Woods SSSI and Mark Bushes Wood LoWS; this is considered to have the potential to lead to increased recreation on the SSSI and LoWS which could result in potentially significant negative effects.</p>									
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Topic	Discussion	Option / Rank									
		1a	1b	2a	2b	3a	3b	4a	4b	5	
Climate change	<p>The National Planning Policy Framework (NPPF) requires that development should be directed away from areas at highest risk of flooding, but where new development is proposed, it requires that it makes flooding no worse than it currently is. Therefore in relation to flooding, there should in theory be no significant effects for any of the options as it is assumed that new development would be located outside of flood zones or flood risk would be managed in accordance with the NPPF.</p> <p>Areas identified as Zone 1 are those with the lowest probability of flooding, Zone 2 are those with medium probability, Zone 3a are those with high probability and Zone 3b is land within the functional floodplain. Figure 12-1¹⁷¹ below provides a strategic overview of the areas within the district that are at greatest probability of flooding.</p> <p><i>Figure 12-1: Strategic overview of flood risk in Harlow</i></p>	-	-	-	-	-	-	-	-	-	-

¹⁷¹ Epping Forest District Council and Harlow District Council (2011) *Level 1 Strategic Flood Risk Assessment* [online] Available at: <http://www.harlow.gov.uk/content/forward-planning-ldf-evidence-base-strategic-flood-risk-assessment-2011.pdf> (accessed 04/2014)

<p>Harlow falls within the River Stort catchment area with the river running along the northern boundary of the district. There have been a number of floods since a major flood in 1947, most of which have been confined to the functional floodplain in the north of the town. The figure above shows that the areas at greatest risk of flooding in the district (i.e. Zones 2 and 3a and 3b) are located along the River Stort</p> <p>The use of greenfield land generally is likely to lead to an increase in impermeable surfaces, which could potentially lead to an increase in flood risk in the district. The impact of the various strategic options will depend on many issues, including their land take, topography, and soil conditions.</p> <p>However, while development of large greenfield sites may increase surface water flood risk, they may include flood mitigation measures such as balancing ponds and / or sustainable urban drainage Systems (SUDS). This has the potential to help to avoid potential impacts in relation to surface water flooding.</p> <p>It is notable that Options 3b and 5 propose significant growth to the north of the district, in areas that are in relatively close proximity to Zones 2 and 3. Provided development falls outside the functional flood plain, these options should not have a negative effect in terms of this objective.</p> <p>In relation to Greenhouse Gas (GHG) emissions, the incorporation of sustainable building technologies, such as district heating systems, are more likely to be achieved in larger developments where these are likely to be more feasible and cost effective, thus rendering them viable. Therefore the options which propose larger scale development, such as Options 1b, 2b, 3b, 4b and 5, offer the greatest potential for supporting opportunities for District Heating, and Biomass.</p> <p>However, sustainable construction only plays a small part in helping to reduce GHG emissions. The ability of the options to support greater use of sustainable modes of transport is also an important consideration. By focusing development within the existing urban area, Options 1a, 2a, 4a and particularly 3a (with development focused around key transport hubs) would provide for compact forms of development which should help to reduce a need to travel, and when travel is required, promote the use of public modes of transport, thereby helping to lower GHG emissions.</p>									
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Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Community and wellbeing	<p>Harlow is a relatively deprived district and this is reflected in its national ranking (95th most deprived out of 326 authorities in England). Some of Harlow's neighbourhoods are experiencing localised deprivation, with deprivation highest in and around the town centre and in the south of the district.</p> <p>Options are assumed to perform better where the effect would be to support provision of new or improved facilities, or facilitate enhancements to existing facilities.</p> <p>Options 1a and 1b would focus the majority of new residential development in and around neighbourhood centres, hatches and priority areas in the south west of the district, where the majority of priority regeneration areas have been identified. These options are more likely to incorporate higher density development at key locations across Harlow to facilitate regeneration. Although these centres would continue to provide key services and facilities they would be upgraded through development to provide an appropriate level of provision for future residents. These options would also seek to use existing vacant or underused employment land as a mechanism for focusing investment and change into identified priority areas. The approach set out in Options 1a and 1b would also seek to build on opportunities to foster quality streets and spaces within Harlow, particularly in those areas identified as priority locations. These options are expected to help revitalise existing centres, renew deprived neighbourhoods, and increase provision of key facilities and services, thereby having a significant positive effect in terms of the Community and wellbeing topic.</p>									
		★ 1	★ 1	3	3	4	4	2	2	4

	<p>Options 2a and 2b seek to provide for a growing Harlow by accommodating the majority of new development to the east of the town through the development of sustainable urban extensions, supplemented by smaller extensions to the south. While these options provide some opportunities for neighbourhood renewal, these are limited to selected locations in Harlow (namely the town centre and hatches), largely through the use of selected open spaces. Therefore while these options are expected to have some positive effects in terms of the community and well-being objectives, they are not expected to be as significant as those created by Options 1a, 1b, 4a and 4b.</p> <p>Options 3a and 3b seek to deliver some renewal of the existing town, particularly in the town centre and in the hatches. The strategy for both options is to focus growth to the east of the existing town, rather than renew priority residential areas in the south of the town. Consequently while it is considered that these options would result in regeneration of the town centre, they would lead to minimal regeneration of the district's most deprived neighbourhoods, particularly those in the south, thereby having limited effects in terms of the baseline with regards to reducing poverty, social exclusion and improving health.</p> <p>A key focus of Options 4a and 4b is to drive the regeneration of the town by focusing new development and change in the areas in greatest need of regeneration. In doing so it is considered that this should result in the provision of new facilities and services which would help to reduce inequalities in these areas; consequently, like Options 1a and 1b, these options are expected to have significant positive effects on the baseline.</p> <p>Under Option 5, growth would be directed to the north of the district and urban renewal would not be a priority; consequently lower densities would be provided on sites within Harlow and new development would be minimised in the south of the town. In addition this option does not provide for the renewal of identified priority residential areas; therefore, like Options 3a and 3b it is considered unlikely that it would result in any significant positive effects in terms of the baseline with regards to reducing poverty and social exclusion in the most deprived parts of the district.</p>									
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Topic	Discussion	Option / Rank									
		1a	1b	2a	2b	3a	3b	4a	4b	5	
Economy & employment	<p>Harlow has experienced weak economic growth in recent years and notably it has performed less well in comparison to comparable towns on a range of measures including GVA per worker, knowledge based businesses, skills base and retail ranking. While Harlow has traditionally been a good location for manufacturing and industrial businesses, it has experienced a decline in the number of such businesses in recent years.</p> <p>In terms of employment, Harlow has a high unemployment rate in comparison to national and regional levels.</p> <p>The options promoting greater overall growth in terms of housing provision seek to create a higher number of new jobs in the district.</p> <p>By promoting a strategy that seeks to provide up to 20,000 new dwellings, Option 5 seeks to create 18,121 new jobs in and around Harlow, through the creation of new employment opportunities in urban extensions to the north and east of the district, as well as by promoting growth on the Enterprise Area sites in the east of the district. As such this option is predicted to have the most significant positive effects in terms of the employment and economy objectives.</p> <p>Options 1b, 2b, 3b and 4b all seek to provide a level of housing growth that has the potential to create up to 12,000 new jobs in the district over the plan period. Consequently these options are all predicted to have a significant positive effect in terms of the economy and employment baseline.</p> <p>Options 1a, 2a, 3a and 4a seek to provide a level of housing growth capable of supporting the creation of 8,000 new jobs in the district over the plan period. The approach would seek to utilise vacant and underused offices in the town centre, whilst promoting industrial and manufacturing in Harlow. The approach would also seek to promote the Enterprise Zone sectors whilst also allowing for some change in employment land to allow forecasted growth sectors to grow. Although this approach is expected to have some positive effects in terms of the baseline by creating new jobs, it is not clear whether these options would meet the identified employment needs in Harlow. The Council will be undertaking further assessment of employment land in Harlow to establish this.</p>										
		3	2	3	2	3	2	3	2	1	

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Historic environment	<p>Historic assets such as scheduled monuments and listed buildings can be protected from development through sensitive design and layout regardless of the broad spatial strategy. However, when considering the implications of the spatial strategies on the setting of the distinct areas of Churchgate Street, Old Harlow and Newhall, some differentiation between the options is possible.</p> <p>All of the options propose development to the east of the town centre, however Options 1a and 1b propose significantly less new development on land close to Old Harlow, Churchgate Street and Newhall in comparison to all of the other options. As such Options 1a and 1b are considered to perform most favourably in terms of the historic environment objectives.</p>	★ 1	★ 1	2	2	2	2	2	2	2

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Housing	<p>The Council has identified that between 12,000 and 15,000 (600 and 750 dwellings per annum) new dwellings and 8,000 to 12,000 jobs (400 and 600 new jobs per annum) between 2011 and 2031 are required to meet Harlow’s objectively assessed development needs. The Council’s Strategic Housing Land Availability Assessment (SHLAA) concluded that there is enough land in Harlow to provide approximately 8,900 new dwellings within the district.</p> <p>There is a mismatch between earnings and average house prices in the district, and the disparity between wages and the cost of homes is predicted to grow over the plan period; as such it is considered that there will be an increasing demand for more social-rented accommodation in Harlow over the next twenty years.</p> <p>All nine options provide for additional housing in the district. The issue is the extent to which each option will provide sufficient housing to meet housing need in Harlow. In theory, the higher the number of homes, the better the performance in terms of the housing objective.</p> <p>Options 1a, 2a, 3a and 4a seek to deliver between 7,500 and 8,800 new dwellings in the district over the plan period, with a total of 12,000 new dwellings to be provided within Harlow and in neighbouring districts. This equates to a rate of 600 new dwellings per annum and the lowest level of housing identified as being required to meet the district’s housing needs. While this level of housing provision should help to meet the identified housing shortfall, it would provide a significantly lower level of housing provision overall in comparison to Options 1b, 2b, 3b, 4b and 5, therefore meaning that fewer affordable homes would be built and house prices are likely to continue to rise.</p> <p>Options 1b, 2b, 3b and 4b seek to deliver up to 15,000 new homes in and around the district. This equates to a rate of 750 new dwellings per annum and the highest level of housing identified as being required to meeting the district’s housing needs. In doing so they are expected to deliver the required level of market and affordable housing needed in Harlow. As such these higher growth options are predicted to have significant positive effects in terms of the housing objectives.</p> <p>Option 5 would deliver the greatest number of houses and also contribute to meeting the needs of East Hertfordshire District Council through the creation of a large scale sustainable urban extension to the north of Harlow; as such it is considered to perform the best in terms of this objective.</p>									
		3	2	3	2	3	2	3	2	1

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Land	<p>The amount of developable brownfield land in the district on its own is considered insufficient to meet local housing need, consequently all of the options propose some development on greenfield land, however all options other than Option 1a would also require significant release of land currently designated as Green Belt.</p> <p>Option 1a seeks to focus new development within the existing built up area of Harlow, which is predicted to offer the greatest potential for remediating contaminated land in the district. Furthermore, given that this option would not require release of land within the Green Belt, it is considered to perform the best in terms of the 'Land' objectives.</p> <p>By proposing the greatest level of development during the plan period in the district, in particular on land within East Hertfordshire, and in the north east of Harlow, Option 5 would require the largest release of Green Belt land. As such this option is predicted to have the most significant negative effects in terms of the objectives under the 'Land' topic.</p> <p>All of the other options would require release of Green Belt land for development, however Options 2a, 3a, 4a and 4b would require less development on Green Belt land than Options 1b, 2b and 3b, with Options 4a and 4b directing growth to lesser quality landscape to the east of Newhall up to the M11, therefore these approaches are considered to perform more favourably.</p>		3	2	3	2	3	2	2	4

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Landscape	Overall, all of the options seek to revitalise open spaces by increasing activity and surveillance through appropriately cited development. However, all of the options would require the selective use of open space to accommodate new development thereby resulting in some loss of open space in Harlow.									
	<p>The approach set out by Options 1a and 1b would involve the development of a larger number of smaller sites within Harlow coupled with larger urban extensions to the north east of the town. The approach would involve the loss of some open spaces across the district to support development. While these options would result in a net loss in the quantity of open space, it is considered that the town would still have adequate provision in all areas. However Option 1a performs more favourably than Option 1b in terms of this objective as it would not involve release of Green Belt land.</p> <p>Option 2a seeks to focus growth outside Harlow to areas identified as having fewer landscape constraints whilst also maximising the amount development within the existing urban area of Harlow to reduce the need to develop on green field land outside the district.</p> <p>While Options 2b, 3a, 3b, 4a and 4b would involve a small number of losses of open space across Harlow, overall these options seek to minimise the amount of open space lost to development; however all would also require some release of Green Belt land in and outwith the district so perform slightly less favourably than Option 1a. In terms of Options 4a and 4b, it is notable that the approach seeks to direct growth to lesser quality landscape to the east of Newhall up to the M11.</p> <p>Option 5 includes a small number of losses of open space across Harlow but overall these are minimised. This option would have reduced impact on the town's green wedges and open spaces and future employment development would be provided through urban extensions around Harlow. However this option would result in the highest level of development and would require the greatest release of Green Belt land; therefore it is considered to perform least favourably in terms of the landscape objective.</p>	1	2	1	2	2	2	2	2	3

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Transport	<p>Although Harlow is considered to have a reasonable level of infrastructure provision to facilitate travel by sustainable modes, there is still a high dependency on the private car.</p> <p>By increasing housing and employment provision, all nine options would put increased pressure on transport routes. The issue is the extent to which each option will help to promote a sustainable modal shift.</p> <p>By directing the majority of new development to urban areas where opportunities for passenger transport uptake are highest (e.g. to the northern and eastern parts of Harlow which have good access to railway stations, as well as the town centre which is a key passenger transport and service hub), Option 3a is expected to have the most significant positive effects in terms of transport. This is due to this option being considered likely to lead to increases in passenger transport uptake as well as a reduction in the reliance on private car use.</p> <p>Option 5 seeks to create the highest level of growth (both in terms of housing and employment) through promoting development in and around the town centre and directing significant levels of growth to greenfield sites within and outside the district. While a bypass is not part of the Local Plan, it is likely that a bypass would be required in the north of the district to deliver this option. This option is therefore considered most likely to increase car use and demand, as well as congestion; therefore it is considered to perform least favourably and result in significant negative effects in terms of the transport objectives.</p> <p>Option 2b would direct significant levels of housing development to the southern edges of the district, where public transport accessibility is currently relatively poor. This approach would require significant investment in passenger transport provision in order to ensure the development is linked with the town centre and other passenger transport hubs.</p>	3	4	3	4	1	2	3	4	5

Topic	Discussion	Option / Rank								
		1a	1b	2a	2b	3a	3b	4a	4b	5
Water	<p>Harlow falls within an area identified as being in serious 'water stress' and the situation is likely to worsen in the future as a result of climate change.</p> <p>In terms of water efficiency, while additional development would place additional demands on water resources and thus could exacerbate the situation, it is assumed that larger scale developments are more able to viably achieve higher standards of water efficiency. On the basis that larger schemes would be more likely to lead to achieve higher standards of water efficiency through the incorporation of development-wide efficiency measures, the options seeking to create urban extensions (i.e. Options 1b, 2b, 3b, 4b and 5) within and outside the district are considered to perform most favourably.</p>	2	★1	2	★1	2	★1	2	★1	★1

13 CONCLUSIONS AT THIS CURRENT STAGE

- 13.1.1 The appraisal has predicted a number of significant positive and negative effects across the nine alternative options, with all of the options identified as having merit in different regards.
- 13.1.2 The appraisal predicts that the options proposing higher levels of both housing and employment growth, in particular **Option 5**, followed by **Options 1b, 2b, 3b** and **4b**, would result in **significant positive effects** in terms of the housing and economy and employment objectives by providing for a level of growth that should meet the identified housing and employment needs of the district.
- 13.1.3 In terms of the community and well-being objectives, **Options 1a, 1b, 4a** and **4b** are identified as having the greatest potential to revitalise existing centres, renew deprived neighbourhoods, and increase provision of key facilities and services. For these reasons, they are predicted to have **significant positive effects** in this regard.
- 13.1.4 In terms of the air quality and transport objectives, **Option 3a** is identified as the most favourable option, followed by **Option 3b**, and is predicted to have **significant positive effects**.
- 13.1.5 In terms of the environmental topics, **Option 5** performs least favourably and is predicted to result in **significant negative effects** in terms of the air quality, biodiversity, land and transport objectives.

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

15 INTRODUCTION (TO PART 4)

15.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SA.

16 PLAN FINALISATION

16.1.1 Subsequent to the current consultation it is the Council’s intention to prepare a draft plan for consultation. Preparation of the draft plan will be informed by 1) consultation responses made in relation to the ‘Emerging strategy and further options’ document; and 2) the appraisal findings presented in this Interim SA Report.

16.1.2 The SA Report will be presented for consultation alongside the draft plan. It will answer the four SA Questions and in doing so provide all of the information required by the Regulations. Table 16.1 compares the information that will be presented within the SA Report to that which is presented in this Interim SA Report.

Table 16.1: Information contained within this Interim SA Report Vs. the forthcoming SA Report

Part / SA Question	This Interim SA Report	The SA Report
Part 1 - What’s the scope of the SA?	The Scope of the SA.	
Part 2 - What has plan-making / SA involved up to this point?	Outline reasons for having selected the issues / alternatives that are a focus of SA at the current time.	Outline reasons for having selected the issues / alternatives and site options that were (‘reasonably’) a focus of interim SA, i.e. SA undertaken prior to preparing the draft plan. Outline reasons for having selected the preferred (draft plan) approach subsequent to and in-light of interim appraisal.
Part 3 - What are the SA findings at this stage?	An appraisal of alternative approaches in relation to a key plan issue.	An appraisal of the draft plan approach
Part 4 - What are the next steps?	A general discussion of what happens next.	A general discussion of what happens next, and a section specifying ‘measures envisaged concerning monitoring’

16.1.3 Subsequent to consultation on the draft plan / SA Report the Council will prepare the Proposed Submission Version of the Plan and then Publish this (in-line with Regulation 19 of the Local Planning Regulations, 2012) so that final representations can be made prior to the Plan being ‘Submitted’ to Government, who will then appoint an Independent Planning Inspector to examine the Plan and pass judgement on its soundness.

17 ADOPTION AND MONITORING

17.1.1 Once judged to be ‘Sound’, it will be possible for the Council to formally adopt the Plan. At the time of adoption an ‘SA Statement’ must be published that sets out (amongst other things):

- How SA and consultation responses have been taken into account when finalising the plan (which essentially means updating Part 2 of the SA Report); and
- Measures *decided* concerning monitoring.

APPENDIX 1 – SITE OPTIONS APPRAISAL

As explained in Part 2, as part of the process of identifying spatial strategy alternatives, 369 site options were subjected to criteria-based analysis. The criteria-based methodology was developed in order to reflect the SA framework as best as possible, as demonstrated in Table A below.

Table A: Scope of the site appraisal methodology

SA Topic	SA Objective	Relevant criteria	Comments
Air Quality	<ul style="list-style-type: none"> To ensure that air quality in Harlow remains below objective limits and continues to improve. 	Location in relation to: <ul style="list-style-type: none"> Rail station; Walking and cycling facilities; Bus stop. 	<ul style="list-style-type: none"> It is assumed that proximity to public transport infrastructure could increase the uptake of travel by sustainable modes of transport thereby helping to reduce congestion, a key contributor of air pollution in the district.
Biodiversity and green infrastructure	<ul style="list-style-type: none"> To conserve and enhance biodiversity in Harlow. To promote, enhance and strategically expand the district's network of green infrastructure. 	Location in relation to National and Local nature designations: <ul style="list-style-type: none"> Ramsar Sites; SACs; SPAs; SSSIs; Local Nature Reserves; Local Wildlife Sites; Registered Common Land; and Ancient Woodland. 	<ul style="list-style-type: none"> It is assumed that development on or in very close proximity to environmental designations (given recreational uses) could have negative effects in terms of biodiversity.
Climate change	<ul style="list-style-type: none"> To lower Greenhouse Gas (GHG) emissions. 	Location in relation to:	<ul style="list-style-type: none"> The potential for development to support building integrated renewables - such as solar PV and solar heating - is not locationally dependent; hence it is not possible to appraise site

	<ul style="list-style-type: none"> • To increase the amount of energy generated by decentralised or renewable sources and the use of renewable sources of energy by new development. • To minimise the impact of development on surface water flooding and avoid development within areas of flood risk. 	<ul style="list-style-type: none"> • Rail station; • Walking and cycling facilities; • Bus stop. <p>Location in relation to:</p> <ul style="list-style-type: none"> • Flood Zone 2 and 3. 	<p>options in terms of this objective. Terrain / aspect can have some bearing on the potential for solar gain; however, it has not been possible to analyse site options in this respect.</p>
<p>Community and wellbeing</p>	<ul style="list-style-type: none"> • To reduce poverty and social exclusion. • To meet the health and social care needs of the district's growing and ageing population and its disabled population. • To encourage healthy lifestyles and reduce inequalities in health, particularly through reducing obesity and diabetes. • To renew the district's deprived neighbourhoods and address poor public realm within and around residential areas to ensure that pedestrian routes are integrated with areas of 	<ul style="list-style-type: none"> • Location in relation to: areas of relative (overall) deprivation; employment; and education and training deprivation domains. • Location in relation to: employment areas. • Location in relation to: primary schools; secondary schools; health centres; neighbourhood / town centres. • Assessment of potential for public realm improvements. • Assessment of potential for open space improvements. 	<ul style="list-style-type: none"> • Development in an area of relative deprivation is assumed to be a positive step given that it can lead to developer funding / investment being made available for targeted local schemes / initiatives. Development can also improve the image of an area and help to reduce spatial inequalities in terms of relative deprivation. • Proximity to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly / disabled). • Given the evidence base available, it was not possible to identify how 'opportunity to create safe and inclusive communities' varies spatially within the district (at a resolution that would help to differentiate between site options); hence it was not possible to appraise site options in terms of this objective.

	<p>activity.</p> <ul style="list-style-type: none"> To reduce levels of crime, particularly Criminal Damage and Arson and Vehicle Offence crimes. 		
<p>Economy and employment</p>	<ul style="list-style-type: none"> To reduce a mismatch between jobs and skills by improving levels of skills, training and qualifications within the district. To ensure that job creation is matched by the provision of appropriate facilities and infrastructure. To promote investment, develop an attractive employment base and create a diversified economy within the district through avoiding the dominance of a few large employers and encouraging the ‘clustering’ of businesses within existing locations. To regenerate the town centre through upgrading the level of retail provision, encouraging a broader mix of uses including residential, introducing a high quality public realm 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> No data was available to identify how the potential for development to support the achievement of economic objectives varies spatially within the district (at a resolution that would help to differentiate between site options).

	and restructuring centres to increase passing traffic and overcome accessibility issues.		
Historic environment	<ul style="list-style-type: none"> To protect the district’s historic environmental assets from inappropriate development. To ensure that development respects the character, appearance and features of historical designations, in addition to the setting and views into or out of these areas. 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. To promote the creation of quality streets and spaces whilst protecting the town’s distinctive character and heritage. 	<p>Location in relation to:</p> <ul style="list-style-type: none"> SAMs Listed buildings Conservation Areas Designated parks and gardens. <p>Assessment of whether development of the site would:</p> <ul style="list-style-type: none"> Maintain a compact town; Maintain a broad neighbourhood/Green Wedge structure Maintain a sequencing of development. 	<ul style="list-style-type: none"> SAMs, Listed Buildings, Conservation Areas and Designated parks and gardens are key sensitive ‘receptors’. Ideally, it would be possible to define the spatial extent of the ‘setting’ of heritage assets and then examine whether site options fall within this area; however, data limitations mean that this is not possible.
Housing	<ul style="list-style-type: none"> To increase the provision 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> No data exists to inform the appraisal of housing site options in

	<p>of housing, particularly affordable housing, to ensure that appropriate levels of new dwellings are provided over the plan period.</p> <ul style="list-style-type: none"> • To diversify the housing stock, increase density and address poor public realm within and around residential areas. • To ensure that the housing needs of an ageing (and disabled) population are met. 		<p>terms of contribution to housing objectives. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. This is on the basis that sites will often eventually be brought forward in combination.</p>
Land	<ul style="list-style-type: none"> • To support efficient use of land, including development of previously developed land in the district. • To support the remediation of contaminated land. 	<ul style="list-style-type: none"> • Agricultural land classification 	<ul style="list-style-type: none"> • It has not been possible to identify site options that include contaminated land. However development of contaminated land can be considered a 'positive' on the assumption that remediation will occur.
Landscape	<ul style="list-style-type: none"> • To ensure that development takes into account the Green Belt and Green Wedges that characterise the district. • To ensure that the district's landscape assets are protected and integrated to maximise their potential 	<ul style="list-style-type: none"> • Landscape sensitivity • Green Belt assessment 	<ul style="list-style-type: none"> • A landscape sensitivity analysis was carried out as part of the Harlow Area Landscape and Environment Study. On the basis of the study it was possible to categorise areas of Harlow in terms of 'landscape sensitivity' with a view to understanding more about the capacity to accept development with minimal landscape impacts. It is important to note that the landscape assessment did not examine each and every site option individually. Rather, the assessment was carried out on thirty-one distinctive Landscape Character Areas (identified by the Harlow Area Landscape & Environment Study), some of which

	amenity value, particularly in greenfield areas.		<p>contained numerous sites.</p> <ul style="list-style-type: none"> A high-level Green Belt assessment was undertaken to provide an initial view on the potential suitability or otherwise of land around the town for development. This was undertaken through consideration of the extent to which development of the sites would conflict with the five purposes of the Green Belt.
Transport	<ul style="list-style-type: none"> To promote a more sustainable modal shift so that levels of private car use for commuting are reduced. To promote measures that integrate transport and land use planning in order to provide for the greatest possible increase in passenger transport uptake as well as implementing enhanced access to the M11 through a new junction. 	<p>Location in relation to:</p> <ul style="list-style-type: none"> Rail station; Walking and cycling facilities; Bus stop. 	<ul style="list-style-type: none"> It is assumed that proximity to public transport infrastructure could increase the uptake of travel by sustainable modes of transport thereby helping to decrease reliance on the private car as a means of transport.
Water	<ul style="list-style-type: none"> Given that Harlow is located in an area of serious water stress which will be exacerbated due to climate change and future growth and development, water efficiency measures should be sought, including through the promotion of SuDS. To encourage reduced per 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Consideration of water related objectives need not be a consideration when appraising site options, i.e. data is not available to identify how the potential for development to support the achievement of water related objectives varies spatially within the district (at a resolution that would help to differentiate between site options). Rather, these are issues/objectives that should be a focus at the master-planning and planning application stages of decision-making.

	<p>capita consumption of water and maintain high levels of drinking water quality.</p> <ul style="list-style-type: none"> • To maintain and improve the water quality of Harlow's water courses in line with the Water Framework Directive requirements. • To ensure the distribution and location of new development takes the water supply and sewerage infrastructure into account. 		
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