

## **THE PLAN IS UNSOUND : Matter 1 and or 2**

### **The Plan has not been prepared using strong evidence.**

Trying to calculate both present and future housing need in the area (involving the four Local Authorities who signed the memorandum of understanding) involves shifting circumstances both nationally and locally. Despite this HDC have placed 21 sites on it's list for future development, which in many cases places a 'blight' on home owners, who have no idea of what might happen to open land near their home. Numerous issues have come to light recently because the Harlow Alliance Party have held a number of public meetings since the turn of the year.

**1A1** In the literature sent to residents in a small part of Harlow, the original proposals for Latton Priory, part of the Local Plan for Epping Forest DC (EFDC) which immediately borders Harlow, stated that 2170 jobs would be provided on site by the construction of numerous commercial units. These units no longer form part of the proposals and it therefore stands to reason that many hundreds of new homes are not needed in and around Harlow to house the families of those who would have worked in that area.

**1A2** The loss of office space in Harlow has continued since our original submission, we will come on to the fact that many have been converted to flats in another, separate submission. Changes in working practices such as working from home can only mean a continued decline in the need for new work space. One of the few remaining unused areas in the town is now having 4 warehouses put on it. Such businesses employ very few jobs in relation to the size of the buildings. These two changes alone will have reduced the number of jobs that have been anticipated as being created in the town, reducing the need for so many homes to be built.

**1A3** In our original submission we raised the issue of the changes which are taking place in London. There are many reports now available showing that house prices in London are falling, the drain of jobs leaving for the continent has increased and the population of London fell in 2018 for the first time in decades. The pressure to build more homes in the towns around Harlow is falling and coupled with points 1A1 and 1A2, the need for new homes in such large numbers is likely to fall in the next decade.

The whole Plan makes no mention of the need to make best use of existing housing stock, the rush to build more houses is more to do with getting new homes grants from Central government rather than tackling the "housing crisis" A Freedom of Information Request of HDC reveals that **1500 houses** in Harlow are occupied by just one person, hundreds perhaps thousands more are occupied by just 2 people. Building as proposed is not sustainable in the longer term and more needs to be done by Councils to enable residents to downsize. Having spoken to many residents, one way of doing this is to build more bungalows in the town, something that Frederick Gibberd saw as a way to ensure that houses would become available for future generations of the original residents of the town.

## **THE PLAN IS UNSOUND: Matter 1 and or 2**

### **Insufficient plans for Harlow's housing, infrastructure and employment needs.**

HDC and EFDC used the services of two different consultants to produce Infrastructure Plans for the Harlow and Gilston Garden Town. Both were only made public after the consultation period for each plan had elapsed and there are differences between the two. The cost of the planned busway (recently called a tramway) has two different figures and it is clear that funds to create such a scheme have not been identified. This proposed North to South sustainable transport route will pass through a green finger land that provides essential habitat for wildlife close to the existing residential areas which was a key element to Frederick Gibberds master design for the town. They were used for construction spoil, helping to create an undulating landscape feature. The land is therefore unsuitable for the construction of a tramway and would lead to increased costs to those identified in the Plan. The green finger land also serves to provide a route for the main sewers and land drainage routes for the Thames Water Authority. This would again increase the cost to create this tramway. Existing residents have never been consulted on the idea of a tramway, which in some cases would run very close to their homes.

HAP is not against finding sustainable solutions to transportation in the town but would expect all such schemes to be inclusive to all residents, both existing and those moving into new housing schemes. It is important therefore to choose routes that can provide easy access for all, to alternative transport systems and to get maximum take up by residents. The routes on this Plan do not provide this.

Whilst the Plans of HDC and EFDC both identify the need for essential major infrastructure works, it is clear to those of us living in Harlow that relief from the congestion and the additional traffic from the new developments, need to be provided. Concentrating on making it possible for through traffic to get past the main part of the town without continuous jams at peak times is essential. Yet the proposals by so called experts persist in getting traffic to pass through Harlow to reach main traffic routes on the towns east and west borders. It is therefore essential to give priority to the funding for a bypass, for traffic that is not stopping in the town.

The HDC Local Plan should not of course be taken in isolation. It's vision is to help with the "regeneration" of the town which includes providing public and leisure services which people will want or have to use. However the Plans of nearby authorities include the building of over 500 homes in Sawbridgeworth, 800 in North Weald, over 1000 at Ware and over 4000 on the border with EFDC will materially affect Harlow. These residents will be encouraged to use services such as schools and the hospital in Harlow. There is little evidence to show how people already move around the town, let alone what might happen when homes are built in nearby towns. As an example, Southern Way is already heavily congested and nothing is being proposed which would make a

substantial difference to this problem, which can only get far worse once all these homes are built.

Businesses looking to expand or relocate to Harlow must surely be put off by the huge problem of traffic congestion, which throws doubt on HDC's ability to attracting business to the town.

The work identified in the Plan, whilst in our view is insufficient, will still mean huge disruption to residents, visitors and commuters whilst work is carried out. The town's fundamental design means trying to cram a quart into a pint pot and because so much space is taken by the built environment it is simply not possible to build an infrastructure capable of dealing with so many resident living in the area.

## **THE PLAN IS UNSOUND: Matter 1 and or 2 and 6**

### **Sufficiently protects environmental assets such as the green wedges and local wildlife sites.**

It is quite clear that this Local Plan does not meet this objective.

In Harlow, 77% of the land is occupied by the built environment. This figure becomes even higher if you exclude the space occupied by the private golf course out of the equation. At the heart of the towns design was the need to create large open spaces in between it's high density estates.

HDC's Local Plan looks to create a busway, the route of which will include running North to South, through what most people would say was the major green open space in the town, changing it forever. In addition, 20 sites, many of which are or have been used as public play spaces have been identified for future house building. By reducing grass cutting and general maintenance, these areas have become less used by residents, which has allowed HDC to say they should be used for other purposes.

We have come across an example of how badly this Plan has been prepared and how communicating with residents is so useful, when we met 25 residents at our first public meeting, to discuss the proposed housing site adjacent to Fennells. We have enclosed a picture, where you will see a sign on the land which says Parndon Wood Nature Reserve. A resident pointed us to Harlow Council's own website ([www.harlow.gov/print/pr16-27](http://www.harlow.gov/print/pr16-27)) where there is an article about the Queens Diamond Jubilee and London 2012 The article states that four playing fields, Ash Tree Field, Harlow Skate Park, Jean McAlpine Park and **Parndon Wood Nature Reserve** all became Queen Elizabeth Fields in Trust in 2012, protecting them as a permanent living legacy for the Queens Diamond Jubilee and London 2012.



We also believe that covenants were placed on many if not all these open spaces by The Harlow Development Corporation as the town was built. These are either being ignored by HDC or have been removed without any consultation with residents.

**As a result of these findings HDC must at the very least remove the Parndon Wood Nature reserve site from it's Local Plan.**

## **Matter 1**

### **Lack of consultation**

We would like to draw your attention to the Statement of Community Involvement, Table 3.2 Possible Planning Policy Consultation Methods, which was adopted by HDC In September 2014..

The following is we believe a good summary of what HDC did (or rather did not) do during the period leading to it's final version of the Plan.

### **Website and Consultation Portal**

A significant proportion of residents do not have access to or use the internet and unless residents were to be informed by other means it begs the question of how people would know that information would be made available on the HDC website. In view of the time taken to produce the Plan, regular updates should have been provided using the other methods of communication. 21% of Harlow residents were not born in the UK, so most would not have English as their first language therefore information should have been made available in other languages.

### **Local Media**

The Harlow Star ceased sending a reporter to HDC meetings a long time ago which meant that unless articles were sent to them by the HDC or members of the public, very little political news was published. The Council made little if any attempt to do this on the subject of the Local Plan. Due to on-going problems at the Harlow Star, residents in many areas in the town did not receive a copy of this newspaper, indeed it has very recently ceased publication.

### **Social networking**

HAP are not aware of what HDC did if anything in this respect.

### **Surveys and questionnaires**

HAP have spoken to hundreds of residents since it's formation and have not come across anyone who is aware let alone participated in either of these two methods of communication.

### **Presentations, workshops and focus groups**

HDC only met with 3 residents groups.

### **Leaflets and posters**

HAP are not aware that any were produced.

### **Notifications**

Without using numerous methods of communications, how would residents know that notifications were being made available?

### **3.13 to 3.15 Hard to reach groups**

In view of the above, HAP suspects that very little if anything was done to involve those that it considered “hard to reach groups”.

#### **What should have been done?**

Like EFDC for example, every household in the District should have been sent literature on this subject at the outset. Following this, Harlow Times (which is delivered to every household 4 times a year) should have been used to communicate with residents, giving timely updates, advising them of how they could become involved and the timeline as progress was being made. HDC failed to do this however, no mention of the Local Plan was made in the autumn and winter 2017 or spring 2018 editions, but a two page article appeared in the summer 2018 edition, AFTER the consultation period had ended. This clearly demonstrated that HDC did not want to involve residents in this process.

HDC should have met with it's own tenants and leaseholder groups, the numerous residents associations around the town and the many 'interest' groups such as the U3A which has over 900 members. This should have included exhibitions, which should have been taken to a vacant shop space in the Harvey Centre and to the local libraries and community centres. Providing questionnaires would have given residents the opportunity to make comments throughout the time that the Plan was prepared.

HDC has many of it's own public notice boards around the town which it could have used to publicise meetings with residents (and it's own meetings), as well as exhibitions it was holding.

All of the above should have been available in different languages to mirror those used by the 21% of residents not born in this country.

In the absence of a reporter from the local newspaper, HDC's public relations service should have sent articles to the local press to advertise it's meetings and immediately after they took place, when the local Plan was discussed.

Finally, at the heart of good communication is providing feedback following the consultation. At the end of the process a summary report should have been published and made available to all residents.

## **Matter 1**

### **Windfall sites**

We alluded to the fact in our submission to the Council that there seemed to be a parallel planning process in place neither of which took account of each other.

In the last 2 months, planning permission has been given for 361 new homes in a former carpark, close to Harlow Town railway station, one of the developers at Gilden Way successfully sought planning permission for an extra 150 homes on their part of the site, planning applications have been made to convert other buildings into some 50 homes and an extra 40 homes have been given permission on another site. This totals just over 600 homes and there are many more to come. We believe a similar situation exists in the EFDC area which negates the need for the total housing requirement in the area covered by the joint working arrangements. The simple fact is, if thousands more homes are built in addition to those in the Local Plan, none will have been catered for in terms of the infrastructure requirements, such as school places and doctors surgeries

Evidence of this can already be found, when it was reported that as a result of the many office conversions in Harlow which are being used as temporary homes, over 430 children were living in such properties last Christmas, placing a huge strain on schools and other public services.

**HAP believe that all of the sites we identified in the Local Plan, which attracted over 380 signatories, should be removed from the Local Plan as the number of properties required in the town is quickly being found during the normal on going planning process.**



# HARLOW ALLIANCE PARTY

Preserving our heritage, promoting our future



Andrea Copsey  
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Examination  
PO Box 12607  
Clacton-on-Sea, CO15 9GN

4<sup>th</sup> March 2019

Dear Ms Copsey

## Independent Examination – Harlow Local Development Plan

I write in response to your letter dated 5 February which included the guidance notes for the examination.

I have enclosed eight documents which we wish to be considered by the Inspector. Both I and the Deputy Leader of The Harlow Alliance Party would like to participate in the Hearings.

I have indicated at the top of each submission which matter on the draft hearing timetable it refers to.

I trust these are acceptable in this form. 3 copies of the documents have been sent by first class post.

Should you need to contact me via email my address is

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Yours sincerely,

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Leader of Harlow Alliance Party

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