

Harlow District Council Sustainability Appraisal Scoping Report

Final Report
February 2010



Photographs courtesy of Harlow District Council

Revision Schedule

Sustainability Appraisal Scoping Report February 2010

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1 Introduction

1.1 This report

- 1.1.1 Scott Wilson has been commissioned by Harlow District Council ('the Council') to carry out the Sustainability Appraisal (SA) of the Harlow Core Strategy. The Core Strategy forms part of the Harlow Local Development Framework (LDF).
- 1.1.2 SA involves identifying and evaluating the impacts of a plan on the economy, the community and the environment – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts. SA is a statutory requirement for Core Strategies and other Development Plan Documents (DPDs) under the Planning and Compulsory Purchase Act 2004.
- 1.1.3 In order to undertake the appraisal of the Core Strategy and other DPDs, it is first necessary to establish a methodology or framework for undertaking the appraisal as well as an evidence base to inform the identification and evaluation of impacts. The framework and evidence base are documented in a Scoping Report.
- 1.1.4 It should be noted that the SA incorporates a Strategic Environmental Assessment (SEA) as required under EU legislation¹.

1.2 Harlow Core Strategy

- 1.2.1 The Council commenced preparing their Core Strategy in September 2007. The Council is now preparing issues and options for consultation. This report provides the framework and evidence base for undertaking the appraisal of the Core Strategy and other DPDs.

1.3 Report structure

- 1.3.1 This report is structured as follows:
- Chapter 2 sets out the approach to preparing the Scoping Report
 - Chapters 3 – 6 set out the evidence base for key spatial areas in Harlow
 - Chapters 7 – 17 set out the evidence base for key sustainability topics
 - Chapter 18 sets out what happens next in the plan-making and SA processes.

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

2 Approach to the SA

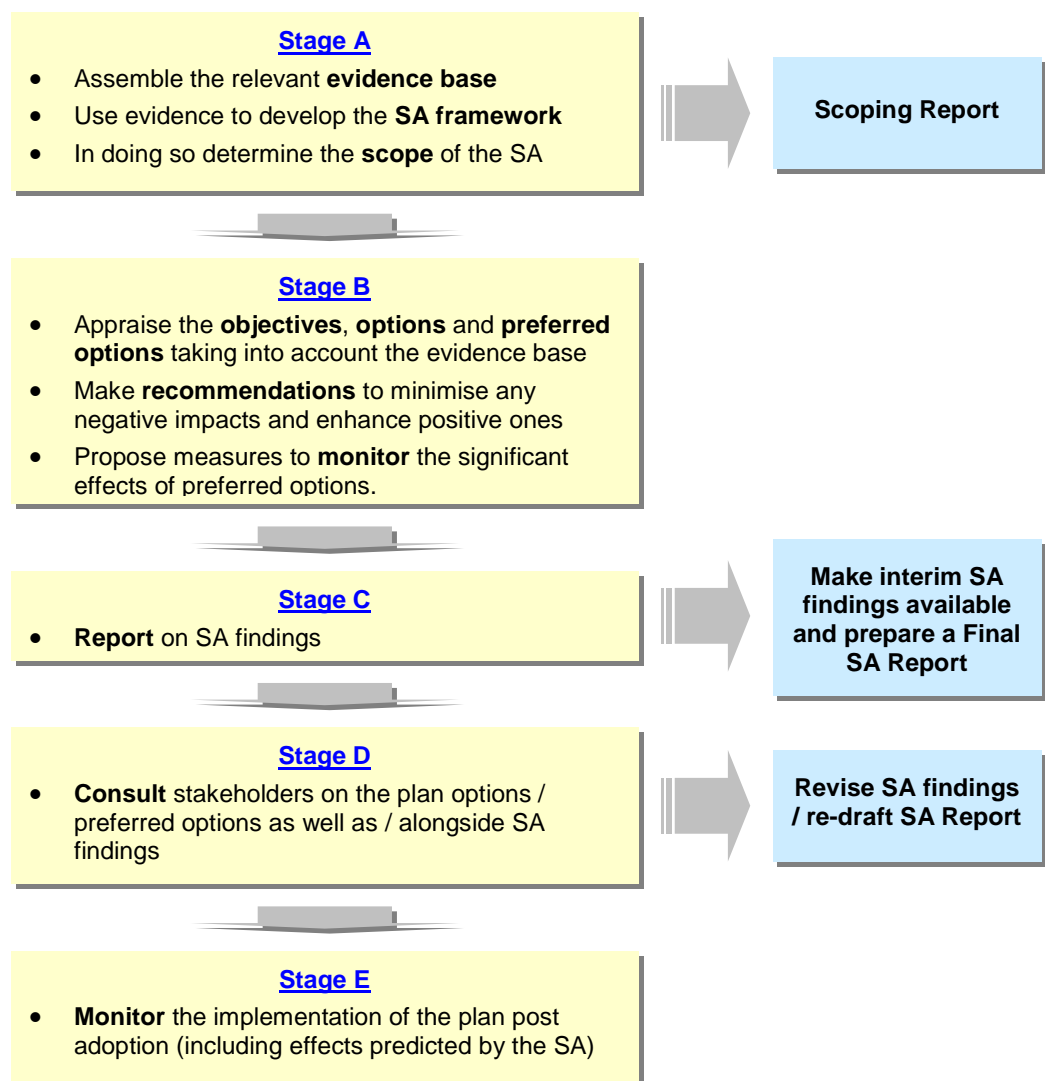
2.1 Introduction

- 2.1.1 This chapter sets out the approach taken in preparing the Scoping Report including the proposed framework around which the appraisal will be organised.

2.2 SA process

- 2.2.1 SA is based on a five-stage approach – see Figure 1.

Figure 1: Five stage approach to SA



Stage A – Framework and evidence base

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

Stage B – Appraisal

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

Stage C – Reporting

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

Stage D – Consultation

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

Stage E – Monitoring

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

2.3 SA methodology

- 2.3.1 This Scoping Report has been structured around a series of spatial areas within Harlow district as well as a series of topics. Together, these spatial areas and topics provide the proposed framework for undertaking the SA.
- 2.3.2 For each spatial area and topic identified, we have asked a series of questions in order to complete the Scoping Report:
- What's the policy context?
 - What are the key sustainability objectives that we need to consider?
 - What's the situation now (including any identified problems)?
 - What will be the situation without the plan?²
 - What issues should be a particular focus for the appraisal?
- 2.3.3 For future rounds of appraisal itself, we will also ask the following questions:
- What will be the situation with the plan?
 - How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?
 - How can we best monitor the plan's impacts?
- 2.3.4 These questions correspond to the key requirements of the SEA Directive, therefore clearly demonstrating compliance with the Directive's requirements – see Table 1.

² Note that the situation without the plan equates to the current plan for the District together with other future changes and trends.

Table 1: Meeting the requirements of the SEA Directive

Key questions	Corresponding requirement of the SEA Directive (the 'environmental report' must include...)
What's the policy context?	<i>"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"</i> (Annex I(a))
What are the key sustainability objectives that we need to consider?	<i>"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"</i> (Annex I(e))
What's the situation now (including any identified problems)?	<p><i>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</i> (Annex I(b))</p> <p><i>"the environmental characteristics of areas likely to be significantly affected"</i> (Annex I(c))</p> <p><i>"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC"</i> [NB problems relating to European sites are addressed through Habitats Regulations Assessment] (Annex I(d))</p>
What will be the situation without the plan?	<i>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</i> (Annex I(b))
What will be the situation with the plan?	<p><i>"the likely significant effects (1) on the environment, including on issues <u>such as</u> biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors</i> [our emphasis]</p> <p><i>(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects"</i> (Annex I(f))</p>
How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?	<i>"the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme"</i> (Annex I(g))
How can we best monitor the plan's impacts?	<i>"a description of the measures envisaged concerning monitoring..."</i> (Annex I(i))

- 2.3.5 In relation to the question 'What are the key sustainability objectives that we need to consider?', we have focused in particular on the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – and the Harlow Sustainability Strategy six key priorities for 2009/10 to 2012/13.³

Table 2: Integrated Regional Sustainability Framework objectives

East of England Integrated Regional Sustainability Framework Objectives	
1	Promote sustainable growth within environmental limits
2	Reduce poverty and inequality and promote social inclusion
3	Reduce greenhouse gas emissions
4	Adapt to the impacts of climate change
5	Promote employment, learning, skills and innovation
6	Increase resource efficiency and reduce resource use and waste
7	Conserve, restore and enhance the region's natural and built environment
8	Move goods and people sustainably
9	Meet the needs of the changing regional demographic
10	Provide decent, affordable and safe homes for all

2.4 Proposed SA framework

- 2.4.1 In identifying the spatial areas and topics that will provide the basis for the appraisal, we have considered:

- The topics addressed in the SA of the East of England Plan⁴
- The topics suggested in the SEA Directive (see Table 1 above)
- The likely significant effects of the Core Strategy
- The views of the Council

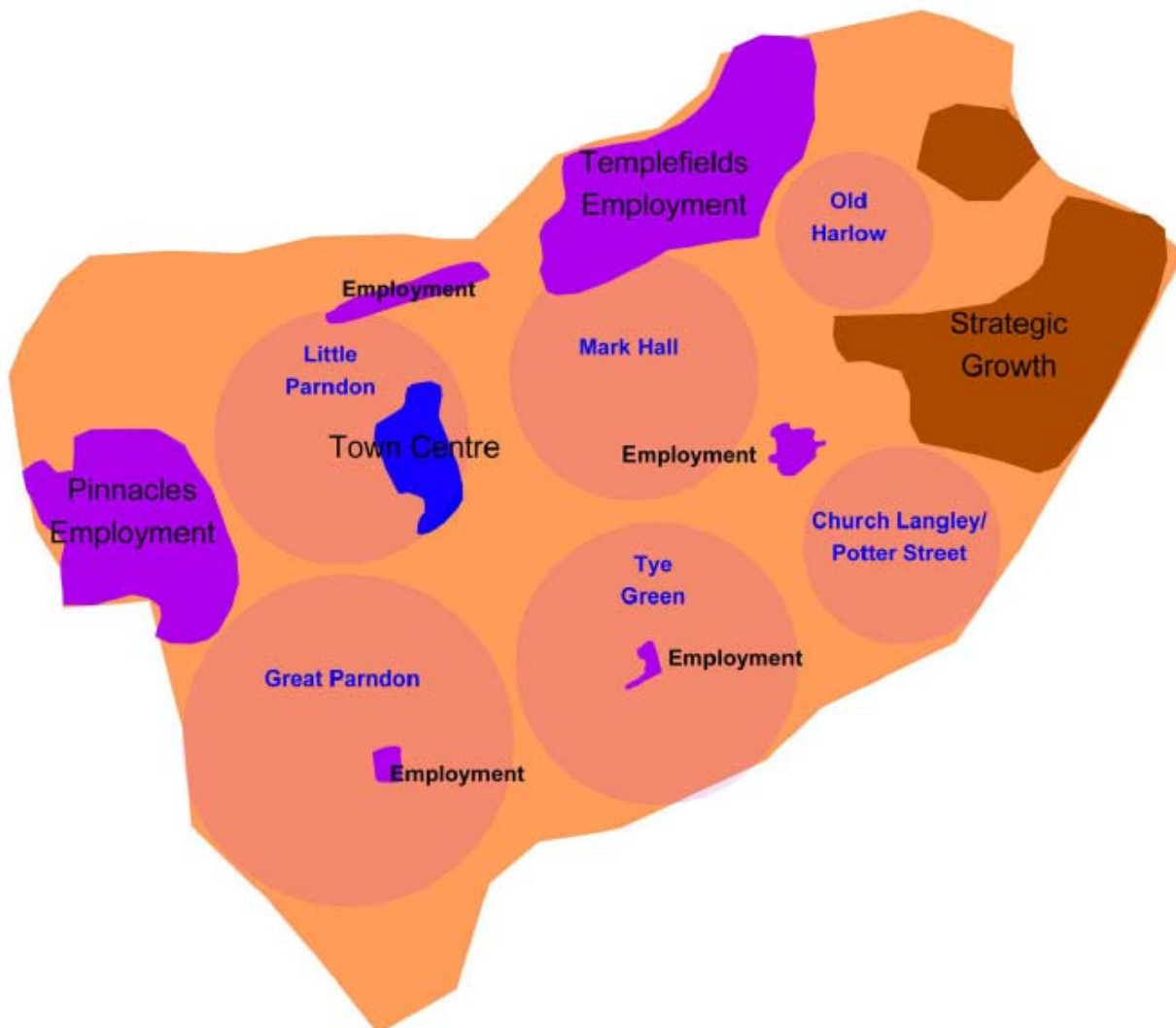
- 2.4.2 As shown in Figure 2 the proposed spatial areas are:

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

³ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

⁴ Scott Wilson and Land Use Consultants (2009) *East of England RSS Review: Integrated Sustainability Appraisal Scoping Report* [online] available at: <http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/east-of-england-plan-review-to-2031-integrated-sustainability-appraisal/> (accessed 2 February 2010).

Figure 2: Harlow District Spatial Function Areas



2.4.3 The proposed topics are:

- Air quality
- Biodiversity and green infrastructure
- Climate change (mitigation and adaptation) (includes flood risk)
- Community and wellbeing
- Economy and employment
- Historic environment
- Housing (includes gypsies and travellers)
- Land (includes waste)
- Landscape

- Transport
 - Water
 - European sites
- 2.4.4 Please note that European sites are covered separately from biodiversity for the purposes of integrating HRA.

2.5 Integration of SA with other assessment and proofing exercises

- 2.5.1 The previous section sets out our approach to undertaking the SA. This section provides the methodology for the integration of SA with other assessment and proofing exercises (which should, as appropriate, include Equality Impact Assessment (EqIA), Health Impact Assessment and Rural Proofing). This section will also describe how this integrated approach will be applied at the Scoping and Assessment stages, as well as describing how the Scoping and SA Reports will be structured.

Habitats Regulations Assessment / Appropriate Assessment (HRA / AA)

- 2.5.2 Our methodology is consistent with the requirements of the *Planning and Compulsory Purchase Act 2004*, the *European Directive 2001/42/EC* (the “SEA Directive”) and the *Conservation (Natural Habitats, &c) (Amendment) (England and Wales) Regulations 2006* (*Habitats Regulations*). In practice there will be little integration between the SA and HRA / AA processes beyond the evidence gathering stage. In this Scoping Report we have included a **European Sites Topic Paper** that provides the methodology, evidence base and scope for the HRA / AA. See Chapter 18: European Sites.

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

- 2.5.3 Methodologies promoted for stand-alone processes of EqIA and HIA tend to be closely comparable to the process set out in government guidance on SA. As a result, these assessment exercises can be relatively easily incorporated into the SA process.
- 2.5.4 The new PPS12 states that: “Where authorities are required by law or encouraged by government policy to undertake assessments of their plans, such assessments should feed into and be summarised in the sustainability appraisal”.
- 2.5.5 Although SA can consider the full range of topics, the premise for integrating topic specific assessment exercises is to ensure that some topics receive the attention and prominence in the appraisal process that they warrant (given the plan context) and are given an appropriate level of consideration.
- 2.5.6 We propose that incorporation of the other assessment exercises, where appropriate, in the SA is through:
- The focus on collecting topic specific evidence, for example, the incorporation of EqIA and HIA evidence base in a **Community and Wellbeing Topic Paper** in this Scoping Report. See Boxes 1 and 2.

Box 1: Equality Impact Assessment (EqIA)

EqIA aims to anticipate the effects of a plan on different groups within the community (equality target groups). A key driver for EqIA is the Equality Act 2006, which places statutory obligations on public sector organisations to ensure that all equality groups are not discriminated against within public sector service delivery and employment. The forthcoming Single Equality Bill 2009, a new streamlined public sector equality duty, is due to replace existing race, disability and gender equality duties and will be extended to cover all strands of discrimination, including measures to tackle socio-economic disadvantage.

Guidance on EqIA suggests a six-stage process of screening, scoping / defining, information gathering, making a judgement, action planning, and publication and review⁵. This very closely matches the SA process, but focuses on the needs of, and impacts on, specific groups and the differential nature and proportionality of impacts. This very closely matches the SA process, but focuses on the needs of, and impacts on, specific groups and the differential nature and proportionality of impacts.

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

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

We will follow the same process for the EqIA as we follow for the SA, i.e. we will prepare a topic paper 'Community and Well-being' that will include equality and diversity for inclusion in the Scoping Report and later ask how the options and preferred options / policies will impact on equality issues. The EqIA component in the topic paper in the Scoping Report will be organised around the eight equality target groups (and any others identified in discussion with the Council). The Council may decide to involve consultees and groups associated with EqIA in the Scoping Report consultation.

⁵ Improvement and Development Agency (2008). *The EqIA process: six-step guide* [online] available at: <http://www.idea.gov.uk/idk/core/page.do?pageId=8017502> (accessed 16 September 2009).

Box 2: Health Impact Assessment (HIA)

Health Impact Assessment (HIA) is an approach that ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects. HIA is a relatively new tool, and although there is no single agreed national approach or methodology, the value of HIA is increasingly being recognised, both nationally and internationally.⁶

Basic sequential steps involved in carrying out HIA can include:

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

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

2.6 Consultation on this Scoping Report

- 2.6.1 Consultation during the SA is a statutory requirement and is an essential part of the SA process. Consultation on the Scoping Report is important as it allows stakeholders to verify that all of the relevant plans, policies and programmes have been reviewed, to check that the most up-to-date baseline information has been included and to ensure the key sustainability issues have been identified.
- 2.6.2 This report was sent to the three Statutory Consultation bodies⁷ (Natural England, English Heritage and the Environment Agency). Other stakeholders representing an interest in the environment were also consulted (for the full list of consultees see Appendix 1). The report was issued for formal consultation for a period of five weeks. This document now incorporates responses to comments received. The comments received and responses to those comments are included in Appendix 2.

⁶ London Health Commission (no date). *Health Impact Assessment* [online] available at: <http://www.london.gov.uk/lhc/hia/> (accessed 4 June 2009).

⁷ As required by Regulation 4(1) of the Environmental Assessment of Plans and Programmes Regulations 2004

3 Town centre

3.1 Introduction

- 3.1.1 This chapter sets out for Harlow town centre the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

3.2 What's the policy context?

- 3.2.1 Planning Policy Statement 6 (**PPS6**): Planning for Town Centres⁸ sets out national policy on planning for town centres and should be taken into account in the preparation of local development documents (LDDs). Main town centre uses addressed by this PPS include: retail; leisure, entertainment facilities and intensive sport and recreation uses; offices, both commercial and those of public bodies, and; arts, culture and tourism. The Government's key objective for town centres is to promote their vitality and viability by planning for the growth and development of existing centres and promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all.
- 3.2.2 **Draft PPS4**: Planning for Prosperous Economies⁹ consultation closed at the end of July 2009 with the government expecting to publish the final PPS and associated guidance before the end of 2009. The draft PPS4 seeks to combine all national planning policy on economic development in urban and rural areas and town centres into one consolidated and streamlined PPS. The new PPS4 seeks to provide planning certainty for businesses and investors by creating a 'positive planning' environment which recognises the importance of different drivers of economic development, from town centres through to rural enterprise. It also retains the sequential test of town centres first. In its final form this PPS will replace a number of existing guidance documents including PPG4: Industrial, Commercial Development and Small Firms, PPG5: Simplified Planning Zones and PPS6: Planning for Town Centres.
- 3.2.3 **Policy E5: Regional Structure of Town Centres** of the East of England Plan¹⁰ identifies Harlow as a major town centre of strategic importance for retail and other town centre purposes. The policy states that major new retail development and complementary town centre uses should be "*consistent in scale with the size and character of the centre and its role in the regional structure*".
- 3.2.4 **Policy SS6: City and Town Centres** of the East of England Plan states that town centres are "*fundamental to the sustainable development of the East of England and should continue to be the focus for investment, environmental enhancement and regeneration*". There is a need to support, enhance and develop their roles; and local authorities are expected to cooperate by

⁸ Communities and Local Government (1996) *Planning Policy Statement 6: Planning for Town Centres* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps6/> (accessed 9 September 2009).

⁹ Communities and Local Government (2009) *Planning Policy Statement – Consultation Paper on a new Planning Policy Statement 4: Planning for Prosperous Economies* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/consultationeconomicpps> (accessed 8 September 2009).

¹⁰ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 8 September 2009).

developing strategies to protect and enhance centres, and by appropriately locating new provision.

- 3.2.5 **Policy SS3: Key Centres for Development and Change** of the East of England Plan identifies Harlow as one of a number of Key Centres for Development and Change (KCDC). The strategy for Harlow, as outlined in **Policy HA1: Harlow Key Centre for Development and Change** includes to “*promote the renaissance of the new town through developing its role as a major regional housing growth point, major town centre and strategic employment location to 2021 and beyond. Regeneration and redevelopment of the existing town and urban extensions will be combined with transport measures and enhancement and conservation of green infrastructure to fulfil this strategy*”. The additional 16,000 dwellings between 2001 and 2021, should in part be provided “*within the existing area of the town through selective renewal and redevelopment, including mixed use development in the town centre*”. The Strategy also states that the town centre and employment areas should be developed to:
- Enhance Harlow’s retail offer and strengthen its position within the regional hierarchy of town centres
 - Enhance the role of Harlow as a key centre for further and higher education and research based institutions
 - Provide for growth of Harlow’s established sectors and clusters
 - Attract employment related to the growth of Stansted Airport, which does not need to be located there
 - Assist the growth of small and medium sized enterprises and attract new economic development and innovation.
- 3.2.6 **Policy SS5: Priority Areas for Regeneration** of the East of England Plan identifies Harlow as a town with significant areas of deprivation and that LDDs and relevant non-statutory plans should set out policies to tackle the problems of economic, social and environmental deprivation.
- 3.2.7 Harlow’s Community Strategy – the Harlow 2020 Vision¹¹ – must be taken into account in preparing the LDF. To deliver the Vision a number of priorities have been set out to address key issues relevant to the Town. In order to deliver ‘Economic Prosperity’, one of the priorities listed is ‘to continue to regenerate the Town Centre’, in order to establish Harlow as a place that can compete with other shopping centres in the area and encourage local people to spend their money within the town. The Vision states that “*The Town Centre has a strong influence on perceptions of Harlow and parts are now tired and outdated. Investment will create more confidence in the Town and encourage companies to stay in the area and others to locate in Harlow*”.
- 3.2.8 Regeneration of the town is a top corporate priority for Harlow Council. The Draft Harlow Regeneration Strategy 2009-2021^{12 13} envisages Harlow as a sub-regional centre and retail destination and lists ‘Driving forward Town Centre Renewal’ amongst seven priority issues in order to achieve the aims and vision of the Regeneration Strategy, “*boosting Harlow’s position as a centre of economic activity, attracting new business and higher income earners to the*

¹¹ Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 18 August 2009).

¹² Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

¹³ It is expected that the Draft Regeneration Strategy will be approved by the Council in November 2009.

town". The current Harlow Regeneration Strategy and Implementation Plan 2007-2009, seeks to achieve a regenerated town centre over a five to 10 year period, including regeneration of the Harvey Centre and implementation of the proposals for Town Centre North and Wych Elm. It also suggests that the Vision for Harlow is supplemented by the statement: *"A sustainable sub regional centre with a vibrant, diverse and high-performing economy, and the infrastructure to support"*.

- 3.2.9 Harlow Town Centre Strategy Supplementary Planning Document (SPD)¹⁴ sets out the following vision for Harlow Town Centre as the destination of choice:

"Harlow town centre is an attractive, people focused place with vibrant, commercially successful, mixed use districts connected by a grid of lively streets and world class squares. Stylish and contemporary, Harlow's New Town heritage engenders a strong sense of place of which Harlow's residents are rightly proud. Within the sub-region Harlow town centre is the natural destination of choice."

- 3.2.10 The Strategy has three aims:

- Establish a strong urban form that delivers both quality and reflects the needs of Harlow today
- Define clearly the role of the Harlow town centre and to describe a range of opportunities that will contribute clearly to that role
- Deliver positive change that revitalises the town centre and accelerates image change.

- 3.2.11 Although the Strategy introduces a new structure for the town centre, it also takes forward elements of Sir Frederick Gibberd's original master plan. The Strategy was adopted as an SPD by Harlow Council and is intended to help:

- Inform development control decisions, guiding and shaping opportunities as they come forward in Harlow Town Centre
- Shape emerging planning policy for the town centre
- Establish a high quality baseline for proposals within the town centre, including design principles and guidance for the public realm and built form.

- 3.2.12 The 2004 redevelopment of the southern part of Harlow town centre into the Water Gardens with supermarkets and high street stores, led to decreased footfalls in the northern end of the town and problems for some businesses. Harlow Town Centre North¹⁵ is undergoing regeneration and this will work towards the transformation of Harlow into a sub-regional shopping centre and, as outlined in the East of England Plan, this is a necessity for Harlow given the proposed growth that it has to deliver. The regeneration plans for 1.3 million square feet of new development will *"re-integrate Harlow Town Centre North with the rest of the town centre and include proposals for new shops, a hotel, businesses and homes alongside transformed public spaces, a new bus interchange, new library and new entertainment*

¹⁴ Harlow Council (undated) *Harlow Town Centre SPD* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/town_centre_spd.aspx (accessed 8 September 2009).

¹⁵ See: http://www.harlow.gov.uk/about_the_council/council_services/growth_and_regeneration/regeneration_unit/growth_regeneration_projects/town_centre_north.aspx (accessed 8 September 2009).

facilities".¹⁶ The target of Harlow Council, major developer Stockland and partners – Harlow Renaissance, Homes and Community Agency, EEDA and Essex County Council – is for Harlow to feature within the top ten sub-regional shopping centres in the country. It is anticipated that a Planning Application will be submitted in 2010 with an aspiration to begin work in 2011, with completion due for 2014 but the opening of the first buildings in 2012.¹⁷

3.3 What are the key sustainability objectives that we need to consider?

3.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Reduce poverty and inequality and promote social inclusion
- Reduce greenhouse gas emissions
- Promote employment, learning, skills and innovation
- Increase resource efficiency and reduce resource use and waste
- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

3.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee. Relevant priorities include:¹⁸

- Regenerating the Town
- Promoting a clean, green, healthy and safe environment
- Tackling housing need
- Improving Harlow for business
- Providing value for money.

3.4 What's the situation now?

3.4.1 Three broad sub areas have been identified in the town centre: Town Centre South, Town Centre Central and Town Centre North. The layout of Harlow town centre is based upon the original Master Plan, with an arrangement of uses to include a 'chief shopping area' in Town

¹⁶ See: <http://www.harlowtowncentrenorth.co.uk/> (accessed 8 September 2009).

¹⁷ See: <http://www.harlowrenaissance.co.uk/projects/harlow-town-centre.aspx> (accessed 8 September 2009).

¹⁸ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

Centre Central, 'civic squares' in Town Centre South, and a mix of locally based activities in Town Centre North and around Market Square. The original Gibberd Master Plan looked to:¹⁹

- Establish close and attractive links between the centre and adjoining housing areas
- Create an inner core of pedestrian focused streets and spaces
- Introduce a diversity of functions that would maintain a lively town centre at all times
- Strengthen the identity of the town centre through the introduction of taller buildings, notably the now demolished Civic Centre tower, with its iconic rooftop observation pavilion, designed by Gibberd
- Allow green wedges to penetrate through to the edge of the town centre.

3.4.2 Strengths of the town centre include its compactness and its location in a prominent position on higher ground, with the potential to expand northwards towards the railway station.²⁰ It contains a good mix of civic, commercial and leisure functions for a town of Harlow's size, in addition to some housing. However, although Broad Walk remains the busiest street in Harlow, much of the original street structure has since been removed and layout has been revisited due to development requirements.²¹ In addition, according to the draft Harlow Regeneration Strategy 2009-2021:²²

The Town Centre has become increasingly polarised between the newer development to the South and the ageing northern end characterised by vacant shops and a vastly diminished outdoor market.

3.4.3 Connectivity, isolation of town uses, underuse, a poor and unattractive physical environment and a struggling evening and night time economy; are all listed as issues for the town centre. There are also several uses (e.g. postal sorting office, petrol filling station, fire station) that do not necessarily require, or suit the building layout of, a town centre location. It has been described as an "urban centre that lacks vitality, viability and has no unique sense of place", with three main design problems causing assorted issues for the town:²³

1. Arrival in Harlow. This is marred by an 'unwelcoming' appearance (e.g. car parks and service yards), the ring road, and poor connectivity and signage, with the route in for pedestrians placed secondary to motor vehicles. The location of the M11 to the east, rather than the west, of Harlow has resulted in heavy peak traffic flows around the city centre that is destined for principal employment areas. The railway station is located a distance to the north from the town centre and the Town Park acts in part as a barrier; however, the Harlow gateway development should aid connectivity between the station and town centre.

¹⁹ Harlow Council (undated) *Harlow Town Centre SPD* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/town_centre_spd.aspx (accessed 9 September 2009).

²⁰ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 9 September 2009).

²¹ Harlow Council (undated) *Harlow Town Centre SPD* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/town_centre_spd.aspx (accessed 9 September 2009).

²² Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

²³ Harlow Council (undated) *Harlow Town Centre SPD* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/town_centre_spd.aspx (accessed 9 September 2009).

2. Severance of the town centre from adjoining residential areas. This is worsened by poor pedestrian accessibility to the town centre, a lack of people living within the town centre, and a limited evening economy focused on a younger age range. The Harvey Centre covered mall is both inwardly focused and presents a barrier at night when it is closed. A lack of housing limits the ability to maintain a vibrant atmosphere.
3. Absence of quality streets and public spaces and landmarks. This has resulted in a lack of identity and character and offers little incentive to explore the town centre. The Water Gardens, Market Square and the Board Walk may be considered exceptions, but they also have issues that need to be addressed.

3.4.4 The Strategy also states that Harlow has become increasingly dependent on its service sector and retail offer. However, according to the Quarter Business Plan & Development Strategy (Dec 2008), Harlow's total catchment market share of Comparison Goods reveals that 91.3% of residents within the centre's total catchment are currently shopping elsewhere. Without further development, it also predicts that Harlow will fall 20 places in the CACI Retail Footprint ranking, from 158 to 178.²⁴ Although one-fifth of all Harlow jobs are located in the town centre, the number has fallen significantly since 1998. In addition, Lakeside and Bluewater are seen as serious accessible competitors for Harlow's town centre.²⁵

3.4.5 According to the Environment Agency the present town centre is very poor in biodiversity. The EA states that within any new scheme biodiversity enhancements should be a key issue, including measures such as the creation of new green spaces rather than concreted areas, native tree planting, Sustainable Drainage Systems, etc.²⁶

3.4.6 Based upon previous research, the Harlow Town Centre SPD identifies four key principles to take forward and reinforce the role and identity of the town centre²⁷:

- Encourage a greater connectivity of the town centre to adjacent housing areas
- Allow comprehensive restructuring of the town centre to address service access, poor edge quality, entry, nature of street space to include the possible reintroduction of through vehicle movement
- Address designation and design of the ring road creating a lively, actively fronted boulevard
- Increase the mix of uses, including residential development, to generate longer activity periods and broaden the town centre's offer.

3.4.7 The SPD²⁸ also identifies key strategic goals for the town centre based on prior research:

- Achieve high quality civic design from overall layout to detail street, space and building

²⁴ According to: PACEC and Halcrow Group Limited (2005) *Harlow District Council Harlow Regeneration Strategy – Evidence Base and Analysis of Needs – Final Report* [online] available at: <http://www.harlow.gov.uk/pdf/Final-Evidence-Base-Analysis-of-Needs-Final-Report-July-2005-full.pdf> (accessed 9 September 2009).

²⁵ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 9 September 2009).

²⁶ See Appendix 1.

²⁷ Harlow Council (undated) *Harlow Town Centre SPD* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/town_centre_spd.aspx (accessed 9 September 2009).

²⁸ Harlow Council (undated) *Harlow Town Centre SPD* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/town_centre_spd.aspx (accessed 9 September 2009).

- Integrate new development and renewal with existing built structures of merit
 - Reinforce natural landscape forms.
- 3.4.8 Harlow Renaissance is a partnership of four members (Harlow District Council, Essex County Council, East of England Development Agency, Homes and Communities Agency) established to support delivery of the regeneration and growth process in Harlow. Activities and priorities for 2009-2011 include: *“To develop an holistic approach to the development of the town centre that delivers a major step change in quality and also to create increased activity in the town centre and neighbourhood centres in the short term”*.²⁹

3.5 What will be the situation without the plan?

- 3.5.1 Intervention through the Core Strategy is likely to focus particular attention on regenerating the town centre. The Town Centre SPD will provide strategic direction and guidance for the development of the town centre, however; without a district-wide plan the development of the town centre may not proceed in the most sustainable manner and will not benefit from joined-up thinking for the District and wider area. In addition, without the plan the regeneration of the northern end of the Town Centre may not proceed in the most suitable manner or in keeping with the needs of the District and regional policy objectives. In the absence of intervention through the Core Strategy the town centre's retail performance, and the town centre urban environment and connectivity with the rest of Harlow, might also suffer.

3.6 What issues should be a particular focus for the appraisal?

- 3.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the town centre include:
- The need to regenerate the town centre to address issues with connectivity, vitality, viability and a lack of a unique sense of place, these include:
 - The need to improve the town centre's physical environment including public realm and landmarks to create character and an identity for the centre
 - The need to improve the town centre's economy and retail performance
 - The need to increase the mix of uses in the town centre, including residential development
 - The need to improve pedestrian access into the town centre
 - The need to consider the development planned for Harlow Town North.

²⁹ Harlow Renaissance (2009) *Business Plan* [online] available at: <http://www.harlowrenaissance.co.uk/about-us/business-plan.aspx> (accessed 10 September 2009).

4 Eastern growth area

4.1 Introduction

- 4.1.1 This chapter sets out for Harlow's eastern growth area the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

4.2 What's the policy context?

- 4.2.1 The Government's housing guidance states that local planning authorities and stakeholders should explore various options for accommodating new housing growth including *"expansion of existing settlements through urban extensions and creation of new freestanding settlements"*³⁰.
- 4.2.2 PPS3 recognises that, although increasing performance targets for development on previously developed land should be a priority over development on greenfield sites; Local Planning Authorities *"will need to assess and manage the risk to housing delivery, to ensure that their approach does not jeopardise delivery against the housing trajectory"*.
- 4.2.3 Harlow is expected to provide a significant number of the region's homes. The East of England Plan³¹ states that 16,000 dwellings need to be delivered between 2001 and 2021 by Harlow, Epping Forest and East Herts District Councils. **Policy HA1: Harlow Key Centre for Development and Change** sets out a strategy for Harlow, stating that housing should be provided: *"through urban extensions to the north, east, and on a smaller scale the south and west"*. The strategy will also *"promote the renaissance of the new town through developing its role as a major regional housing growth point, major town centre and strategic employment location to 2021 and beyond. Regeneration and redevelopment of the existing town and urban extensions will be combined with transport measures and enhancement and conservation of green infrastructure to fulfil this strategy."*
- 4.2.4 The housing spatial distribution between the three Districts will be informed by the options appraisal technical study. According to **Policy HA1**, the DPDs for these Districts will *"determine the appropriate distribution between the existing town and the urban extensions, including the more detailed location and scale of required development. The objective is to put in place a development strategy which promotes Harlow's regeneration, is as sustainable as possible, and can be implemented at the required pace."* Factors to be taken into account include *"making use of urban capacity"*, and *"the differing implementation issues in regard to the urban extensions"*, including transport implications.
- 4.2.5 The Harlow Area Landscape and Environment Study³² was commissioned to inform the options appraisal technical study and in a detailed analysis of the immediate fringes of Harlow,

³⁰ Communities and Local Government (2006) *Planning Policy Statement 3: Housing* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> (accessed 22 July 2009).

³¹ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goee/docs/Planning/Regional_Planing/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 8 September 2009).

³² Chris Blandford Associates (2004) *Harlow Area Landscape and Environment Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/harlow_area_land_scape_study.aspx (accessed 10 September 2009).

identifies that *“the least sensitive area with the highest potential capacity for development is the majority of the Eastern Fringe”*.

- 4.2.6 The Harlow Replacement Local Plan³³ designates Newhall as a Strategic Housing Site and an essential part of the strategy to meet Harlow housing requirements. Under the Plan, land identified for further development of this new neighbourhood will not be released until after 2011, or *“until it is shown as an allocation in the Local Development Document whichever be earlier”*.

4.3 What are the key sustainability objectives that we need to consider?

- 4.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow’s eastern growth area. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Reduce poverty and inequality and promote social inclusion
- Reduce greenhouse gas emissions
- Increase resource efficiency and reduce resource use and waste
- Conserve, restore and enhance the region’s natural and built environment
- Move goods and people sustainably
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

- 4.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council’s Sustainability Strategy and approved in January 2009 by the Environment and Community Committee:³⁴

- Regenerating the Town
- Promoting a clean, green, healthy and safe environment
- Tackling housing need
- Improving Harlow for business
- Providing value for money.

³³ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 10 September 2009).

³⁴ Harlow District Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

4.4 What's the situation now?

4.4.1 The eastern growth area – in addition to Harlow Major Urban Area – is the least sensitive landscape in the Harlow Area, rated as low sensitivity from small-scale urban developments up to very large-scale urban development. Moreover, it has the highest potential capacity for very large-scale and substantial scale urban development. The Land Character Area (LCA) for this land is Area 20b - Jack's Hatch to Church Langley Ridge. It is characterised as follows:³⁵

- Landform - Very gentle undulating valley head
- Landscape pattern - Generally moderate to large-scale and irregular
- Character of skyline - Contained to east by topography; urban to west
- Inter-visibility - Limited by topography and urban areas
- Rare landscape features - Few historic and nature conservation assets
- Settlement pattern/communication routes - Limited settlement
- Sense of enclosure - Contained by urban/transport and topography
- Sense of tranquillity/remoteness - Very limited
- Historic landscape time-depth and stability - Generally limited.

4.4.2 A key characteristic landscape feature of this LCA and the eastern fringe is the slight ridge towards the east and running from the south of Harlow up towards the Stort Valley. This ridge edge is recognisable from many areas within Harlow and therefore plays an important role in the wider landscape; acting as a 'visual screen' between Harlow and the surrounding LCAs.

4.4.3 The tumuli group south of the built up area of Old Harlow is a key feature of historic interest in the eastern fringe area and it is noted that *"this area has a high potential to contain further archaeological deposits"*.³⁶ There are also listed buildings within the location and conservation areas close to the area at Church Street. Other environmental features include county wildlife sites, open space and green belt designations, and also green wedge. A small area of Flood Risk Zone 3 runs through the location at Churchgate Street. It should be noted that, although there is an area of historic open farmland at the eastern growth area, due to intensive farming significant amounts of hedgerows, trees and biodiversity have been lost.

4.4.4 Key traffic routes in and connecting to the eastern fringe include the M11, A1025, A414, B183, Foster Street and Green Lane. However, there are no junctions directly connecting the M11 with these routes.

4.4.5 The growth area is situated predominantly within the ward of Old Harlow. Key statistics relating to this ward include:³⁷

- A predominantly white (94%) population of 5,845 (2,805 male; 3,049 female)

³⁵ Chris Blandford Associates (2004) *Harlow Area Landscape and Environment Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/harlow_area_land_scape_study.aspx (accessed 10 September 2009).

³⁶ Chris Blandford Associates (2004) *Harlow Area Landscape and Environment Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/harlow_area_land_scape_study.aspx (accessed 10 September 2009).

³⁷ Harlow Council (2006) *Harlow Ward Profiles – Old Harlow* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/growth_and_regeneration/regeneration_unit/key_statistics_and_data/harlow_ward_profiles.aspx (accessed 10 September 2009).

- 63% of accommodation is owner occupied and the ward has the highest proportion of properties owned outright (38% of all owned properties). Of the 2,498 inhabited households:
 - 30% pensioner households
 - 30% single person households
 - 48% one family households
 - 37% married couple households
 - 62% of the 16+ population are classified as 'living in a couple' with 52% either married or re-married. The ward has the highest percentage of 'widowed' individuals (10% of the unmarried 38%) in Harlow
 - The ward has a relatively high level of education and qualification based attainment, with an estimated over one-fifth of employed inhabitants with high-level qualifications
 - 71.8% of the working age (16-74) population are economically active with 93% in work; 78% of which are in full-time employment. The largest occupation type is managers and senior officials (17% of jobs) followed by administrative and secretarial positions (15% of jobs). The unemployment rate has consistently been the second lowest in Harlow.
- 4.4.6 Old Harlow and Churchgate Street are major settlements in the area, both of which have important settings and historic value. Newhall is a distinct and new neighbourhood development within the growth area that will require its own setting. Newhall has a planned residential population of 6,000 with mixed uses, to include: employment, shops, services, schools, and community and leisure facilities. The masterplan for Newhall sets aside 40% of land for habitat creation and leisure uses and requires development areas to be built at higher than average densities. Other features include a residents' trust for neighbourhood management, high energy standards, and a number of homes designed for live-work or home-working in addition to small-scale neighbourhood employment developments.

4.5 What will be the situation without the plan?

- 4.5.1 In the absence of intervention through the Core Strategy, further development in the eastern growth area beyond 2011 to support necessary strategic and community infrastructure is unlikely to occur.
- 4.5.2 Without the plan, dependent upon the outcome of the ongoing Harlow area growth options appraisal technical study, development is likely to go ahead in the eastern growth area. However, the development may not proceed in the most sustainable manner and will not provide the joined-up thinking that a Core Strategy provides – taking into account other factors and the wider needs of the District.

4.6 What issues should be a particular focus for the appraisal?

- 4.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the eastern growth area include:
- The low landscape value of the area

- The need to give early consideration to landscape and biodiversity enhancement, recreation provision and access routes
- The need to ensure that the eastern growth area provides access to a range of adequate employment opportunities
- The need to consider environmental and historic constraints in the area, including: green belt, green wedge, open land, county wildlife sites, historic value – a tumulus and listed buildings, and a small area of flood risk
- The need to ensure that the existing historic settlements and distinct settings of Churchgate Street and Old Harlow, and the new settlement of Newhall, retain their distinctive identity
- Scope to extend green wedges between the urban edge of Harlow and new neighbourhoods in the wider countryside, ensuring a continuity of green corridors.

5 Neighbourhoods

5.1 Introduction

- 5.1.1 This chapter sets out for Harlow's neighbourhoods – Little Parndon, Mark Hall, Old Harlow, Great Parndon, Tye Green, Church Langley / Potter Street – the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

5.2 What's the policy context?

- 5.2.1 **PPS6:** Planning for Town Centres³⁸ sets out national policy on planning for town centres and should be taken into account in the preparation of LDDs. **Draft PPS4:** Planning for Prosperous Economies³⁹ in its final form will replace a number of existing guidance documents including PPS6. **PPS6** states that:

"Local planning authorities should adopt a positive and proactive approach to planning for the future of all types of centres within their areas. Having regard to the regional spatial strategy and reflecting their community strategy, local planning authorities should, through the core strategy development plan document, set out a spatial vision and strategy for the network and hierarchy of centres, including local centres, within their area, setting out how the role of different centres will contribute to the overall spatial vision for their area."

- 5.2.2 **Policy E5** of the East of England Plan states that: *"Below the level of the centres of regional strategic importance local development documents will identify a network of more local town centres, district centres, neighbourhood centres and village centres"*. **Policy SS6: City and Town Centres** states that LDDs, local transport plans, sustainable community strategies and relevant economic, environmental and cultural strategies should protect and enhance existing neighbourhood centres and, where the need is established, promote the provision of new centres of an appropriate scale and function to meet local day to day needs.

- 5.2.3 The Essex Local Area Agreement (LAA), published in 2006, aims to prioritise and focus on the needs of identified groups of service users and residents in a way that will lead to a step-change in the collective effectiveness of the whole public sector in Essex. Fourteen priorities for action are set out for the 'Health and Opportunity for the People of Essex', including: *"Improve the quality of life for people in the most disadvantaged neighbourhoods and ensure service providers are more responsive to neighbourhood needs and improve their delivery"*.

- 5.2.4 The Replacement Harlow Local Plan⁴⁰ sets out the neighbourhood centres (in the middle of residential groupings within about a half of a mile of each home) and hatches (meeting daily needs within about a quarter of a mile of most homes) for Harlow and places a high emphasis

³⁸ Communities and Local Government (1996) *Planning Policy Statement 6: Planning for Town Centres* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps6/> (accessed 9 September 2009).

³⁹ Communities and Local Government (2009) *Planning Policy Statement – Consultation Paper on a new Planning Policy Statement 4: Planning for Prosperous Economies* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/consultationeconomicpps> (accessed 8 September 2009).

⁴⁰ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 10 September 2009).

on their *“important role to play in providing local facilities for residents which can help reduce car travel and increase sustainability”* and the need to retain their vitality and viability.

- 5.2.5 Harlow’s Community Strategy – the Harlow 2020 Vision⁴¹ – must be taken into account in preparing the LDF. The Vision notes the importance of *“Adherence to the spirit of the town’s original master plan, which focuses on developments in neighbourhoods, with local facilities within walking distance and access to open spaces or green wedges”*. To deliver the Vision a number of priorities have been set out to address key issues relevant to the Town. Included as part of Homes and Neighbourhoods is *“Improving the local neighbourhood street scene and enhancing the green environment”*. A Homes and Neighbourhoods Action Group has been established.
- 5.2.6 The Harlow Regeneration Strategy and Implementation Plan 2007-2009⁴² sets out six themes that includes ‘Homes, Neighbourhoods and Quality of Life’, for which core objectives have been set (using the Vision as a basis):
- Improving the overall supply of housing and widening choice
 - Increasing the supply of good quality, decent and affordable housing
 - Improving local neighbourhoods and enhancing the green environment
 - Ensuring adequate provision of health and community facilities.
- 5.2.7 Over a five to 10 year period, the Regeneration Strategy seeks to achieve:
- Upgrading of the District Centres and Neighbourhood hatches most in need of renewal
 - Significant progress with neighbourhood renewal.
- 5.2.8 One priority action of the Regeneration Strategy was for neighbourhood developments and the implementation of the approved Growth Area Fund (GAF) II (and subsequently GAF III) Neighbourhood Renewal Projects. In February 2006, Harlow Council secured £10M from the government to spend on a business innovation centre and on improving some of Harlow neighbourhoods. This has resulted in four neighbourhood renewal projects: Clifton Hatch, Old Harlow, Prentice Place and Staple Tye.⁴³ Harlow Renaissance is a partnership of four members (Harlow District Council, Essex County Council, East of England Development Agency, Homes and Communities Agency) established to support delivery of the regeneration and growth process in Harlow. It sets out a vision that includes for Harlow to: *“be recognised as a model for neighbourhood renewal in terms of integrating the old and the new, setting high standards of design, build and environmental quality”*. This is seen as part of the Vision alongside the achievement of sub-regional status. Activities and priorities for 2009-2011 include: *“To develop an holistic approach to the development of the town centre that delivers a*

⁴¹ Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 18 August 2009).

⁴² Harlow Council (2007) *Regeneration Strategy and Implementation Plan 2007-2009* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.aspx (accessed 9 September 2009).

⁴³ See: http://www.harlow.gov.uk/about_the_council/council_services/growth_and_regeneration/regeneration_unit/growth_regeneration_projects/growth_area_fund_round_2.aspx?styletype=LargeFont&styleclass=FontSize (accessed 10 September 2009).

*major step change in quality and also to create increased activity in the town centre and neighbourhood centres in the short term”.*⁴⁴

- 5.2.9 ‘Regenerating the Town’ is a top corporate priority for Harlow Council. The Draft Harlow Regeneration Strategy 2009-2021⁴⁵ has a vision for Harlow as a sub-regional centre and retail destination and lists ‘Renewing neighbourhoods and Neighbourhood Areas’ amongst seven priority issues in order to achieve the aims and vision of the Regeneration Strategy. A change in the physical structure of the town from development and ageing, and a changing way of life, requires Harlow to have a fresh look at its neighbourhoods. The Strategy states that: *“Developing Neighbourhood Plans will provide an opportunity for multi-agency working to produce responses to issues of multiple deprivation”.*
- 5.2.10 The Harlow Area Investment and Renewal Framework (AIRF)⁴⁶ addresses Harlow’s most pressing needs, and recommends the need for renewal in neighbourhood areas.

5.3 What are the key sustainability objectives that we need to consider?

- 5.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow’s neighbourhoods. Particularly relevant objectives include:
- Promote sustainable growth within environmental limits
 - Reduce poverty and inequality and promote social inclusion
 - Promote employment, learning, skills and innovation
 - Increase resource efficiency and reduce resource use and waste
 - Conserve, restore and enhance the region’s natural and built environment
 - Move goods and people sustainably
 - Meet the needs of the changing regional demographic
 - Provide decent, affordable and safe homes for all.
- 5.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council’s Sustainability Strategy and approved in January 2009 by the Environment and Community Committee.⁴⁷ Relevant priorities include:
- Regenerating the Town
 - Promoting a clean, green, healthy and safe environment
 - Tackling housing need

⁴⁴ Harlow Renaissance (2009) *Business Plan* [online] available at: <http://www.harlowrenaissance.co.uk/about-us/business-plan.aspx> (accessed 10 September 2009).

⁴⁵ Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

⁴⁶ Harlow Council (2006) *Harlow Area Investment and Renewal Framework* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=9116> (accessed 10 September 2009).

⁴⁷ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

- Developing good citizenship
- Improving Harlow for business
- Providing value for money.

5.4 What's the situation now?

- 5.4.1 The Gibberd Masterplan for Harlow set out self-providing neighbourhoods with strong local centres. The original residential neighbourhoods were designed to include their own shopping centre, health facilities, community facilities, schools and places of worship and were separated by green wedges. The urban environment of Harlow has developed since the town's establishment and has seen the introduction of a new neighbourhood with the development of Church Langley and other residential areas, however; the green wedges still remain and Harlow can still be divided into neighbourhood areas each with a neighbourhood centre, as outlined in Table 3.

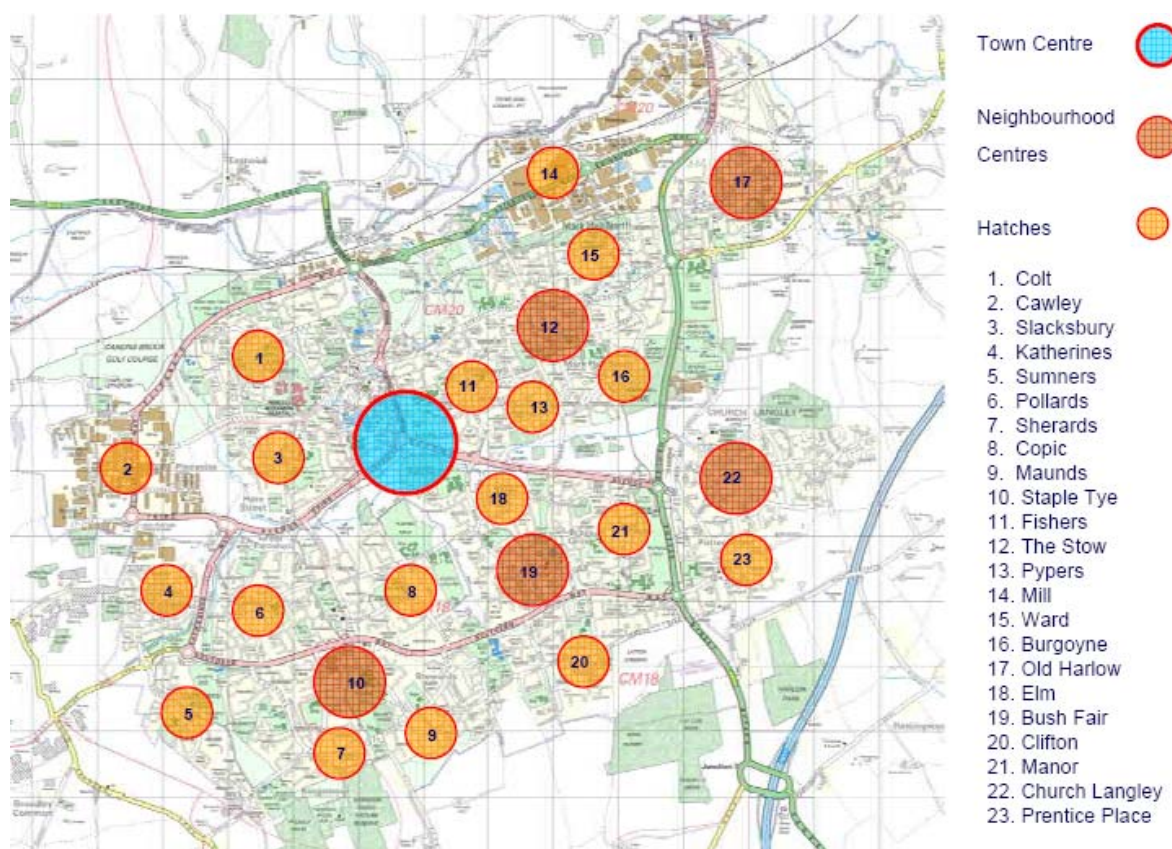
Table 3: The Neighbourhoods and Neighbourhood Centres of Harlow

Neighbourhood	Neighbourhood Centre
Little Parndon	Town Centre
Great Parndon	Staple Tye
Mark Hall	The Stow
Tye Green	Bush Fair
Old Harlow	Old Harlow
Church Langley / Potter Street	Church Langley

- 5.4.2 Harlow was designed with a hierarchy of retail centres; which may now be described as: a town centre; five Neighbourhood Centres: Old Harlow, The Stow, Church Langley, Bush Fair and Staple Tye; and eighteen hatches (see Figure 3).⁴⁸

⁴⁸ GVA Grimley on behalf of Harlow Council (2007) *Retail Study and Town Centre Health Check* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/retail_study.aspx (accessed 10 September 2009).

Figure 3: Neighbourhood Centres and Hatches Location Plan⁴⁹



5.4.3 Neighbourhood centres and hatches have an important role in providing local facilities for residents and minimising car travel. They are of particular importance to Harlow's ageing population and less mobile residents, and local roads were designed to naturally lead traffic towards the neighbourhood centre and provide easy connection between residential areas, the shopping and neighbourhood centres, and the main roads. In reality, however, residents have tended to access amenities elsewhere by using primary routes running past neighbourhood centres.⁵⁰ There is therefore a need to improve the range and quality of facilities offered and to maintain and increase residential accommodation above shops and on previously developed land. According to the Harlow Regeneration Strategy evidence base: *"Neighbourhood centres should also be the foci for redevelopment, regeneration and reinvestment through extension, mixed use and intensification"*.⁵¹

5.4.4 However, the Regeneration Strategy evidence base states that: *"The hierarchy has been undermined over the past decade by local retail parks and other sub-regional shopping centres, but also by changing shopping practices"*. The different areas of the town are not functioning

⁴⁹ See Plan 2: GVA Grimley on behalf of Harlow Council (2007) *Retail Study and Town Centre Health Check* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/retail_study.aspx (accessed 10 September 2009).

⁵⁰ Harlow Council (2006) *Harlow Area Investment and Renewal Framework* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=9116> (accessed 10 September 2009).

⁵¹ PACEC and Halcrow Group Limited (2005) *Harlow District Council Harlow Regeneration Strategy – Evidence Base and Analysis of Needs – Final Report* [online] available at: <http://www.harlow.gov.uk/pdf/Final-Evidence-Base-Analysis-of-Needs-Final-Report-July-2005-full.pdf> (accessed 9 September 2009).

equally well, and some are in need of regeneration, such as Staple Tye, the Town Centre, and parts of Mark Hall (south).⁵²

- 5.4.5 A couple of issues arise in relation to Harlow's green wedges and distinct neighbourhoods. Firstly, that the wedges lower connectivity between neighbourhoods.⁵³ Secondly, the original concept of self-sustaining neighbourhoods – although appropriate for the time and a favoured concept today – is an assumption that does not necessarily fit in with modern behaviour and lifestyle choice. Related to this point is that workers do not live close to industrial areas and increased car use has altered employment patterns and led to centres being bypassed.
- 5.4.6 During the late 1980s and 1990s, in addition to a number of retail developments, the Church Langley neighbourhood centre was developed and the Staple Tye neighbourhood centre was redeveloped. However, Harlow has experienced a long-term retail decline that has caused problems in the town and neighbourhood centres. A limited retail provision has led to residents being more likely to travel to competing town centres, shopping outlets and retail parks located outside of the town centre and neighbourhoods. Moreover, restrictions on change of use and a general dated and run down appearance of Harlow's neighbourhood centres offers little retail reinvestment incentives for the private sector and reinforces a poor internal image for residents.⁵⁴ However, the Local Plan considered that the existing provision of food and drink uses in neighbourhood centres and hatches is adequate and that no further provision is required.⁵⁵
- 5.4.7 Options for Harlow regeneration include proceeding with the development of Harlow Town North; the development of public spaces, street furniture, signage and public art packages; and the development of a neighbourhood centre for New Hall. The Harlow Regeneration Strategy evidence base study proposed a number of questions that address the strategic choices and challenges posed for the improvement of the town centre, retail and local services of Harlow. They are:⁵⁶
- What scale and quality of town centre retail is required to competitively fulfil the sub-regional shopping centre role?
 - A vibrant town centre is significant to other regeneration objectives, including inward investment, new office based activity, use of leisure facilities and the overall quality of life for local residents.
 - Identification of "soft" neighbourhood centres where mixed use redevelopment could provide increased housing and employment densities, and therefore reinvestment opportunities? What criteria should apply?

⁵² PACEC and Halcrow Group Limited (2005) *Harlow District Council Harlow Regeneration Strategy – Evidence Base and Analysis of Needs – Final Report* [online] available at: <http://www.harlow.gov.uk/pdf/Final-Evidence-Base-Analysis-of-Needs-Final-Report-July-2005-full.pdf> (accessed 9 September 2009).

⁵³ Harlow Council (2006) *Harlow Area Investment and Renewal Framework* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=9116> (accessed 10 September 2009).

⁵⁴ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 10 September 2009).

⁵⁵ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 10 September 2009).

⁵⁶ PACEC and Halcrow Group Limited (2005) *Harlow District Council Harlow Regeneration Strategy – Evidence Base and Analysis of Needs – Final Report* [online] available at: <http://www.harlow.gov.uk/pdf/Final-Evidence-Base-Analysis-of-Needs-Final-Report-July-2005-full.pdf> (accessed 9 September 2009).

- Harlow neighbourhoods should be better linked and accessed to allow larger catchment areas to sustain retail provision and the viability of local services?
- Car access is vital for a competitive sub-regional role?

5.5 What will be the situation without the plan?

- 5.5.1 Without the plan, Harlow's neighbourhood centres may continue to appear out-dated and insufficient to meet the requirements of 'self-sufficient' neighbourhoods; and fail to provide essential facilities and services within walking distance for local residents. Issues of connectivity with other Harlow neighbourhoods may be perpetuated and there may be a continuing lack of private investment in retail provision. Regeneration plans for neighbourhood areas may go ahead without the plan, but may not deliver joined-up thinking based upon the original Gibberd concept and town needs. Moreover, neighbourhoods are reliant on numerous inter-relating issues that need to be balanced and considered from a wider strategic viewpoint.

5.6 What issues should be a particular focus for the appraisal?

- 5.6.1 In light of the information above, key issues to take into account in the appraisal in relation to neighbourhoods include:
- Harlow has a characteristic urban structure whereby main neighbourhood areas serve local needs and are divided by green wedges
 - It is desirable to locate schools, community and health centre facilities within each neighbourhood and within walking distance for residents. It can reduce reliance upon car travel and provide for the less mobile of Harlow's residents. However; it is also important to consider the need to access wider facilities and services from the neighbourhoods, such as the town centre and including the provision of alternatives to private cars
 - Issues exist relating to connectivity with other neighbourhoods; the out-migration of residents for services and facilities, and; a poor perception and appearance of centres. This has undermined the hierarchy of retail centres within Harlow
 - Maintenance and viability of local facilities and services
 - Maintenance and enhancement of the local distinctiveness and character of the neighbourhoods.

6 Industrial and employment areas

6.1 Introduction

- 6.1.1 This chapter sets out for Harlow's industrial and employment areas the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

6.2 What's the policy context?

- 6.2.1 National Planning Policy Guidance 4 (PPG4)⁵⁷ addresses the location of new business developments with the key message that *"economic growth and a high-quality environment have to be pursued together"*. It adds that the locational demands of industry should be a key consideration in drawing up plans. Consultation has recently closed on a new PPS4: Planning for Prosperous Economies.⁵⁸ This PPS will consolidate all national planning policy on economic development in urban and rural areas and town centres.
- 6.2.2 **Policy E3: Strategic Employment Sites** of the East of England Plan states that *"Local Development Documents should identify readily-serviceable strategic employment sites of the quality and quantity required to meet the needs of business"*. Harlow is listed as a regionally strategic location at which sites should be provided, in order to assist regeneration and ensure growth. **Policy HA1: Harlow Key Centre for Development and Change** of the Plan sets out a strategy for Harlow as a Key Centre for Development & Change and a Priority Area for Regeneration, developing this role as a *"strategic employment location to 2021 and beyond"*. In addition, Harlow and the surrounding area (Braintree / Brentwood / Chelmsford / Epping Forest / Harlow / Maldon / Uttlesford) has a growth target of 56,000 jobs and will host a proportion of the 68,000 jobs growth envisaged for Hertfordshire.
- 6.2.3 The East of England Plan states that *"the expansion of Harlow provides a major opportunity to address the substantial need for economic and physical regeneration of the post war new town, to meet a significant proportion of the development needs of the London Stansted Cambridge Peterborough growth area to 2021 and beyond, including in regard to employment activities related to the growth of Stansted Airport and housing, and to enhance Harlow's sub-regional status as an important centre for the surrounding areas of Essex and Hertfordshire"*.
- 6.2.4 The Harlow Regeneration Strategy 2006-2009⁵⁹ sets out the following 5-10 year targets in relation to employment and industrial sites:
- New employment opportunities through investment in existing employment areas
 - The creation of new areas such as the Nortel employment area

⁵⁷ Communities and Local Government (1992) *Planning Policy Guidance 4: Industrial, Commercial Development and Small Firms* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicyguidance/ppg4/> (accessed 10 September 2009).

⁵⁸ Communities and Local Government (2009) *Planning Policy Statement – Consultation Paper on a new Planning Policy Statement 4: Planning for Prosperous Economies* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/consultationeconomicpps> (accessed 25 August 2009)

⁵⁹ Harlow Council (2007) *Regeneration Strategy and Implementation Plan 2007-2009* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 10 September 2009).

- Greater diversity of employment with a strong small and medium enterprises (SME) sector and high rates of new business formation and entrepreneurship
 - Recognised clusters of economic specialism in key sectors of importance to the regional economy such as Research and Development (R&D)
 - Regeneration of the older employment areas.
- 6.2.5 The Harlow Replacement Local Plan⁶⁰ proposed an additional 50ha of employment land to be made available for development in Harlow. It released green field land for this purpose, stating that there is no suitable previously developed land (PDL) available for re-use. The plan states that *“allocating employment land near to existing employment land provides synergy for the new development”*. It allocated land adjacent to Nortel (existing employment site) and at Newhall (to achieve a mixed-use development). The sequential approach is to be applied in the determination of development proposals on unallocated sites. The plan also states that the best use should be made of existing employment land, through the reuse and intensification of PDL. Furthermore, land in existing general employment areas is also safeguarded from development for other uses.
- 6.2.6 The Harlow Employment Study (2009) was commissioned to inform options for the LDF Core Strategy and the Regional Spatial Strategy review. Across the Growth Area, within Harlow District and Growth Area locations in neighbouring parts of East Hertfordshire and Epping Forest Districts, this study:
- Identifies and ranks employment sites
 - Identifies primary employment locations
 - Identifies of secondary employment locations
 - Assesses the effect of decline or loss of secondary employment locations
 - Identifies requirements to strengthen secondary employment locations
 - Identifies requirements to allow a change of use
 - Presents a potential strategic hierarchy of employment locations.
- 6.3 What are the key sustainability objectives that we need to consider?
- 6.4 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow’s industrial and employment areas. Particularly relevant objectives include:
- Promote sustainable growth within environmental limits
 - Reduce poverty and inequality and promote social inclusion
 - Promote employment, learning, skills and innovation
 - Increase resource efficiency and reduce resource use and waste

⁶⁰ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 10 September 2009).

- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably
- Meet the needs of the changing regional demographic.

6.4.1 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee:⁶¹

- Regenerating the Town
- Promoting a clean, green, healthy and safe environment
- Improving Harlow for business.

6.5 What's the situation now?

6.5.1 The Gibberd Masterplan for Harlow set out two large industrial estates at the North and the West of the town. These two distinct areas are still used for industrial and employment purposes and are known as, respectively, the Pinnacles and Templefields.

6.5.2 In addition to the major sites of Pinnacles and Templefields, other employment locations identified within the Adopted Replacement Harlow Local Plan within Harlow include:

- Edinburgh Way (adjacent to Templefields)
- The Town Centre
- Land North of Nortel Employment Area
- Railway Station
- Staple Tye
- Bush Fair
- Gilden Way
- Newhall
- Church Langley
- Burnt Mill.

6.5.3 Outside of the main employment areas the neighbourhood centres provide employment opportunities that are more easily accessible to residential areas. However, *"It is considered that the neighbourhood service areas have reached their capacity for retail uses (A1/A2/A3)".*⁶² It should be noted that neighbourhood centres provide employment for residents who are not mobile and/or do not live near industrial and major employment areas.

⁶¹ Harlow District Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 10 September 2009).

⁶² Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 10 September 2009).

- 6.5.4 There are a number of impacts as a result of the allocation of land that should be considered. The allocation of land for employment North of Nortel Networks, for example, will displace a number of sports and recreation facilities.⁶³ There are also likely to be impacts on green field land as a result of lack of PDL for new allocation of employment land, where re-use and regeneration is not an option. According to the Harlow Replacement Plan: *“there are few opportunities for identifying new land for employment in Harlow, due to the separation of housing and employment areas and the constraints on developing Green Wedges and Green Belt”*.⁶⁴
- 6.5.5 Traffic destined for the main employment areas currently causes congestion problems around the centre. This is largely as a result of the M11 being located to the east, rather than the west, of Harlow; as was not envisaged in the original masterplan for the town.
- 6.5.6 The proximity of the M11 and M25 to Harlow also means that residents in the Harlow catchment area for employment are likely to travel to competing town centres, such as Cambridge and Chelmsford. A further consideration for industrial and employment areas includes the quality of environment for employees and whether it is a desirable working location. For example, the retail warehouses at Edinburgh Way are considered to *“dilute the character”* of this area of employment.⁶⁵

6.6 What will be the situation without the plan?

- 6.6.1 Without the plan, not enough land may be taken forward for employment and industrial use, as a result of which Harlow’s employment sector, economy and community more widely will suffer. In addition, land for employment may be poorly allocated – such as on green field land sites or at inaccessible locations – and may not be suitable for purpose. Existing employment land may deteriorate and not receive the necessary investment and support from the District.

6.7 What issues should be a particular focus for the appraisal?

- 6.7.1 In light of the information above, key issues to take into account in the appraisal in relation to industrial and employment areas include:
- The need to appropriately allocate land for employment and industrial use in suitable locations and in the required amount
 - The need to improve the environmental quality of industrial and employment areas
 - The need to re-use employment land and allocate land on PDL where possible.

⁶³ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 10 September 2009).

⁶⁴ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 10 September 2009).

⁶⁵ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 10 September 2009).

7 Air quality

7.1 Introduction

- 7.1.1 The Government has a National Air Quality Strategy⁶⁶ to improve and protect ambient air quality in the UK in the medium-term. Improvements in air quality help meet health and biodiversity objectives, as well as helping to reduce greenhouse gas emissions.

7.2 What's the policy context?

- 7.2.1 At the European level, the Air Quality Framework directive (96/62/EC)⁶⁷ sets a strategic framework for tackling air quality consistently by setting European-wide limit values for twelve air pollutants in a series of daughter directives. The Government's Air Quality Strategy (2000)⁶⁸, required under the Environment Act (1995), sets out plans to improve and protect air quality in the UK. It considers ambient air quality only, leaving other aspects such as occupational, in vehicle and indoor air quality management to be addressed separately. Local authorities such as Harlow have statutory duties for local air quality management (LAQM) under the Environment Act 1995. They are required to carry out regular reviews and assessment against eight of the national objectives. Where it is found that objectives are unlikely to be met, local authorities must designate air quality management areas (AQMAs) to tackle the problem.
- 7.2.2 Harlow district is part of the Essex Air Quality Consortium⁶⁹, formed in 1995 to address air quality issues in Essex. The first round of Air Quality Review and Assessment was completed in 2002 and the second round is due to be completed shortly⁷⁰. Updating and Screening Assessments were completed in 2003 and 2006. Harlow Council has been monitoring nitrogen dioxide and particles since late 2001 and has set up a monitoring station within 50 metres of the A414, but has not declared any air quality management areas.
- 7.2.3 As part of the second Local Transport Plan (LTP2), Essex County Council will be introducing congestion management schemes and corridor improvements along the A414, in order to help reduce congestion and address air quality issues in Harlow.⁷¹
- 7.2.4 Air quality issues should also be tackled by local authorities through spatial planning, local transport and controlling industrial pollution sources. The other two main organisations responsible for managing air quality are the Environment Agency, which is responsible for the regulation of emissions from industrial facilities and processes and the Highways Agency, responsible for managing motorways and trunk roads.

⁶⁶ Defra (2007) *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland* [online] available at: <http://www.defra.gov.uk/environment/airquality/strategy/pdf/air-qualitystrategy-vol1.pdf> (accessed 17 June 2009).

⁶⁷ EU (1996) *Council Directive 96/62/EC of 27 September 1996 on ambient air quality assessment and management* [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31996L0062:EN:HTML> (accessed 17 June 2009).

⁶⁸ Defra (2007) *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland* [online] available at: <http://www.defra.gov.uk/environment/airquality/strategy/pdf/air-qualitystrategy-vol1.pdf> (accessed 16 June 2009).

⁶⁹ See the Essex Air Quality Consortium: <http://www.essexair.org/> (accessed 13 August 2009).

⁷⁰ At time of writing 13 August 2009.

⁷¹ Essex County Council (2009) *Essex Local Transport Plan 2006-2011* [online] available at: <http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/dis/guc.jsp?channelOid=16819&guideContentOid=44746&guideOid=39939> (accessed 13 August 2009).

7.3 What are the key objectives and other decision-making criteria that we need to consider?

7.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Reduce greenhouse gas emissions
- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably.

7.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee.⁷² Relevant priorities include:

- Promoting a clean, green, healthy and safe environment.

7.4 What's the situation now? (including any existing problems)

7.4.1 Harlow District includes about 30 industrial processes, most of which are located in the two main industrial areas in the town: Templefields to the north and the Pinnacles to the northwest. However, during the first round of air quality review, none of these industrial sources was found to be an issue nor as being likely to cause exceedances of air quality objectives.

7.4.2 Traffic emissions are identified as the most significant source of air pollution in Harlow. The main roads in the District are the M11 and the A414 and emissions of NO₂ and PM₁₀ from vehicles on these roads represent the main air quality issues for the District.

7.4.3 Modelling identified the possibility of the nitrogen dioxide air quality objective being exceeded within 50 metres of the A414. The Council has set up a monitoring station at this location, however subsequent monitoring and modelling has shown that the standard has not been exceeded and no air quality management areas have been formally identified in Harlow District.⁷³

7.4.4 Air quality monitoring sites also exist at Old Bank House, East Park, Gardeners, Purford Green and Potters Street; although there is currently insufficient data to comment on significant trends.⁷⁴

Are there any evidence gaps?

7.4.5 Currently it is not possible to comment on significant trends in data at the monitoring sites for NO₂ and PM₁₀ because an insufficient amount of data has been collected. However, the most

⁷² Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

⁷³ Essex County Council (2009) *Air Quality in Harlow* [online] available at: <http://www.essexair.org/> (accessed 13 August 2009).

⁷⁴ Harlow District Council (2005) *LAQM Progress Report 2005* [online] available at: <http://www.essexair.org/> (accessed 13 August 2009).

recently available Progress Report (2005) states that the District Council does not need to carry out any detailed assessment as a result of any findings so far.⁷⁵

7.5 What will be the situation without the plan? (the 'business-as-usual' option)

7.5.1 It is likely that significant new developments in the Harlow area will result in traffic growth within Harlow and will therefore have the potential to impact on air quality.⁷⁶ Construction could potentially also take place on the M11 corridor and the A414, resulting in an increase in traffic movement. As a result of development and increased traffic congestion, air quality objectives may be exceeded and an AQMA declared, potentially near currently monitored sites such as the A414.

7.5.2 Intervention through the Core Strategy may mitigate anticipated reduction in air quality, by complementing plans in the Essex LTP2, and by tackling issues such as transport and air quality in addition to the location of development.

7.6 What issues should be a particular focus for the appraisal?

7.6.1 In light of the information above, key issues to take into account in the appraisal in relation to air quality include:

- The need to ensure that inappropriate levels of development or activities which contribute towards lower levels of air quality are not located within an inappropriate proximity to locations approaching objective limits.

⁷⁵ Harlow District Council (2005) *LAQM Progress Report 2005* [online] available at: <http://www.essexair.org/> (accessed 13 August 2009).

⁷⁶ Harlow District Council (2005) *LAQM Progress Report 2005* [online] available at: <http://www.essexair.org/> (accessed 13 August 2009).

8 Biodiversity and green infrastructure

8.1 Introduction

- 8.1.1 Biodiversity is the term given to the diversity of life on Earth and this includes the plant and animal species that make up our wildlife and the habitats in which they live. As well as being important in its own right, we value biodiversity because of the ecosystem services it provides, such as flood defence and clean water; and the contribution that biodiversity makes to wellbeing and sense of place.
- 8.1.2 Green infrastructure is a network of multifunctional green spaces including formal parks, gardens, woodlands, green corridors, waterways, street trees and open countryside. It can help to make walking and cycling more attractive; promote mental wellbeing; help to establish local identity and a sense of place; help to reduce air pollution; contain flooding; and reduce temperatures at a time of global warming⁷⁷. Green infrastructure also provides corridors which connect areas of open space and allows wildlife to migrate to new habitats as a result of the changing climate.
- 8.1.3 European sites also have biodiversity value and these are listed within Chapter 18 as part of the HRA scoping.

8.2 What's the policy context?

- 8.2.1 The EU Sustainable Development Strategy, adopted in 2006, includes an objective to halt the loss of biodiversity by 2010⁷⁸. The UK is also a Party to the Convention on Biological Diversity (CBD), a principal objective of which is the conservation of biodiversity. Commitment to the CBD led to the preparation of the 1994 UK Biodiversity Action Plan (UK BAP), the overall goal of which is to conserve and enhance biodiversity within the UK and to contribute to efforts to conserve global biodiversity. The UK BAP identifies our most threatened biodiversity assets and includes action plans for the recovery of priority species and habitats⁷⁹. A Biodiversity Strategy for England was subsequently published in 2002⁸⁰ and includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible. PPS9 on Biodiversity and Geological Conservation emphasises that the Government's objectives for planning include ensuring that biodiversity is conserved and enhanced as an integral part of social, environmental and economic development, so that policies and decisions about the development and use of land integrate biodiversity with other considerations⁸¹. Importantly, the Natural Environment and Rural Communities Act 2006 placed a Duty on public authorities to have regard to the conservation of biodiversity in exercising their functions. According to the Government, the

⁷⁷ Davies et al. (2006) *Green Infrastructure Planning Guide* [online] available at: http://www.greeninfrastructure.eu/images/GREEN_INFRASTRUCTURE_PLANNING_GUIDE.pdf (accessed 17 July 2009).

⁷⁸ Council of the European Union (2006) *Renewed EU Sustainable Development Strategy* [online] available at: <http://register.consilium.europa.eu/pdf/en/06/st10/st10917.en06.pdf> (accessed 17 July 2009).

⁷⁹ For further information on the UK BAP see: <http://www.ukbap.org.uk/>

⁸⁰ Defra (2002) *Working with the Grain of Nature: A Biodiversity Strategy for England* [online] available at: <http://www.defra.gov.uk/wildlife-countryside/pdf/biodiversity/biostrategy.pdf> (accessed 17 July 2009).

⁸¹ ODPM (2005) *Planning Policy Statement 9: Biodiversity and Geological Conservation* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/historicenvironment/pps9/> (accessed 17 July 2009).

- Duty aims to raise the profile and visibility of biodiversity, clarify existing commitments with regard to biodiversity, and to make it a natural and integral part of policy and decision-making⁸².
- 8.2.2 The East of England Plan⁸³ contains several policies which provide a context for considering issues of biodiversity and green infrastructure. **Policy ENV1** states that LPAs should seek to secure the effective protection of the environment by considering the nature and location of proposed development as part of a broadly based concern for, and awareness of, biodiversity and other environmental assets. The policy provides specific policy for green infrastructure in which LDDs play an important role in identifying, creating, protecting, enhancing and managing areas and networks of green infrastructure. The policy also states that green infrastructure should be developed in part to maximise its biodiversity value. The Lea Valley Regional Park is identified as an area of landscape, ecological and recreational importance. **Policy ENV3: Biodiversity and Earth Heritage** requires planning authorities to ensure that the region's wider biodiversity, earth heritage and natural resources are protected and enriched through the conservation, restoration and re-establishment of key resources. With reference to the Harlow Area, LDDs should provide for the creation and maintenance of a network of multi-functional greenspaces around the town which take into consideration the principles of the Green Infrastructure Plan for Harlow.⁸⁴ The Stort Valley in particular is highlighted as a major green infrastructure opportunity between Harlow Town Centre and development to the north of Harlow within East Herts.
- 8.2.3 The Harlow Biodiversity Partnership⁸⁵ is an independent group facilitated by Harlow Council. The Partnership takes part in the Essex Biodiversity Action Plan process and helps to guide Harlow Council policies. The Essex Biodiversity Action Plan⁸⁶ sets targets for the protection of species and habitats in Harlow.
- 8.2.4 The Harlow Green Infrastructure Plan⁸⁷ (GIP) provides guidance on how the green areas in the Harlow area should be protected, enhanced and where appropriate extended. Through integration of environmental assets mapping and opportunities analysis, the GIP sets out a Green Infrastructure Network that is intended to be "*reflected in the planning policies of the new Local Development Frameworks to be prepared by Harlow District Council, Epping Forest District Council, East Hertfordshire District Council and Broxbourne Borough Council*". The GIP sets out a vision and proposals for multi-functional green infrastructure in the Harlow Area, and also provides a set of guidelines for developers and planners as to how green infrastructure provision can be integrated into development schemes within the Harlow Area.
- 8.2.5 Harlow district has also carried out a Green Spaces Strategy.⁸⁸ The Strategy addresses the structure, the function, and the amount of provision of the green space areas as well as the individual facilities contained within them. It also considers the provision of 'accessible natural greenspace' and the overall amount of 'internal open space'. The Strategy proposes a long-

⁸² Defra (2007) *Guidance for Public Authorities on Implementing the Biodiversity Duty* [online] available at: <http://www.defra.gov.uk/wildlife-countryside/biodiversity/key-docs.htm> (accessed 17 July 2009).

⁸³ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 4 August 2009).

⁸⁴ Harlow Council (2005). *A green infrastructure plan for the Harlow Area* [online] available at: <http://www.harlow.gov.uk/default.aspx?page=8615> (accessed 4 August 2009).

⁸⁵ Harlow Council (2009) *Harlow Biodiversity Partnership* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/wildlife/harlow_biodiversity_partnershi.aspx (accessed 13 August 2009).

⁸⁶ Essex Biodiversity Partnership (undated) *Essex Biodiversity Action Plan* [online] available at: <http://www.essexbiodiversity.org.uk/Default.aspx?pageid=47> (accessed 13 August 2009).

⁸⁷ Chris Blandford Associates on behalf of Harlow Council (2005) *Green Infrastructure Plan* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=8615> (accessed 13 August 2009).

⁸⁸ Nortoft et al. on behalf of Harlow Council (2004) *Harlow District Council Green Spaces Strategy*. [not available]

term vision for the Green Wedges, and specific Local Standards for each of the 'facilities' or main uses of the green spaces.

8.2.6 The Harlow District Council Open Space, Sport and Recreation SPD⁸⁹ was formally adopted in July 2007. The SPD outlines the Council's approach to the provision of open space in conjunction with new housing development. It includes the objective to *"protect and enhance the character of the town's green spaces"*.

8.2.7 A draft Harlow Regeneration Strategy (2009-2021)⁹⁰ is being developed to deliver the physical, social and environmental regeneration of Harlow. The revised Strategy will build upon the key themes and evidence base identified in the 2007 Strategy to deliver a localised targeted approach in addition to addressing issues of town wide significance. It is considered important that regeneration is in keeping with the town's original design, neighbourhoods, green spaces and community spirit.

8.3 What are the key objectives and other decision-making criteria that we need to consider?

8.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Adapt to the impacts of climate change
- Conserve, restore and enhance the region's natural and built environment.

8.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee.⁹¹ Relevant priorities include:

- Regenerating the Town
- Promoting a clean, green, healthy and safe environment.

8.4 What's the situation now? (including any existing problems)

8.4.1 Harlow District is predominantly an urban environment, but it nevertheless has a number of designated natural areas. Currently eight of its 16 identified County Wildlife Sites (CWSs) achieve PCM (Positive Conservation Management), and a target has been set to raise this to 13 by 2010/11. The district also has three Local Nature Reserves (LNR) at Harlow Marsh (13ha area in north Harlow), Hawkenbury Meadow (2ha in west Harlow) and Parndon Woods

⁸⁹ Harlow Council (2007) *Harlow District Council Open Space, Sport & Recreation Supplementary Planning Document* [online] available at:

<http://www.harlow.gov.uk/pdf/Open%20Space,%20Sport%20and%20Recreation%20Supplementary%20Planning%20Document.pdf> (accessed 13 August 2009).

⁹⁰ Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

⁹¹ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

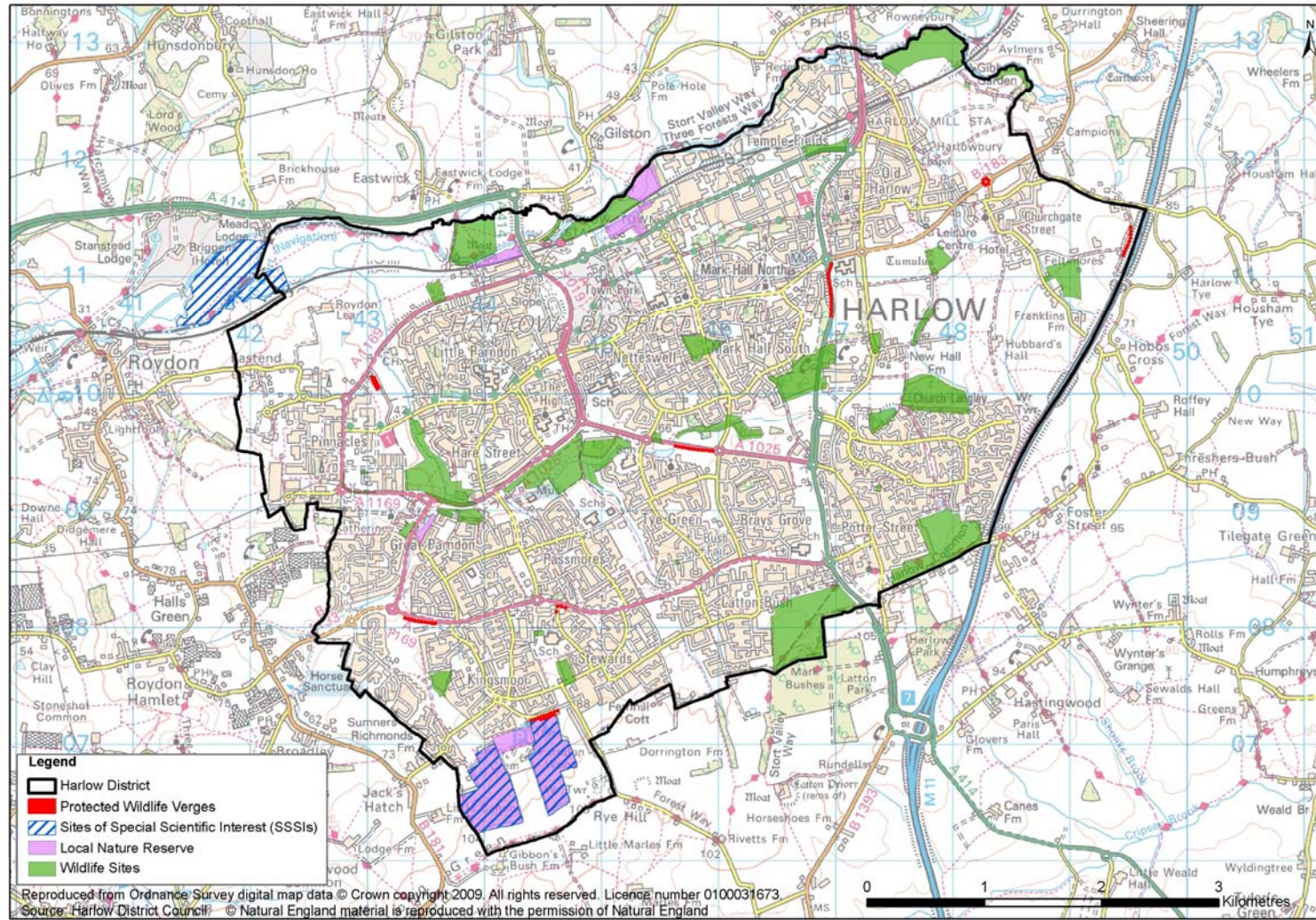
and Common (50ha in south Harlow).⁹² Roadside verges can also contain areas of biodiversity interest, and there are a few roads in Harlow that are in small part designated as Protected Wildlife Verges. See Figure 5 for these designations.

- 8.4.2 The district also includes one Site of Scientific Interest (SSSI). Harlow Woods (45.15ha) until 2007 was described as being in an Unfavourable Declining state by Natural England. The status of SSSI has since changed to Unfavourable Recovering and is thus meeting the Public Service Agreement (PSA) target. The SSSI is situated to the south of Harlow and is made up of two units of a broadleaved, mixed and yew woodland - lowland habitat, comprising three adjacent ancient semi-natural woods: Parndon Wood, Hospital Wood and Ridsden's Wood. Hunsdon Mead SSSI (34.22ha) is located to the northwest on the border of Harlow district, and only 22.06% of this site (one of two units) is meeting the PSA target, being unfavourable recovering, the other unit has been classified as unfavourable no change.⁹³ (See Figure 4).

⁹² Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 13 August 2009).

⁹³ See Natural England's Nature on the Map: <http://www.natureonthemap.org.uk/> (accessed 13 August 2009).

Figure 4: Biodiversity constraints in Harlow



8.4.3 A key habitat within the Harlow area that is of particular relevance to Harlow is the River Stort. It is a key wetland habitat with a wide range of wildlife species, including BAP priority habitats and species.⁹⁴ The Stort Valley is located along the northern border of Harlow district. In the wider Harlow area there are numerous stream tributaries and associate habitats which drain into the major river systems.

8.4.4 The Essex Biodiversity Action Plan (EBAP)⁹⁵ has action plans for 25 species and 10 habitats. Table 4 outlines which of those are identified within Harlow District by the EBAP:

Table 4: Species and habitats identified in Harlow District by the EBAP

Category	Species / habitat
Mammals	Brown hare
	Pipistrelle bat (46kHz)
	Water vole
Birds	Grey partridge
	Skylark
	Song thrush
Other vertebrates	Great crested newt
Plants	Native black poplar
Habitats	Ancient and/or species rich hedgerows and green lanes
	Ancient woodland
	Cereal field margins
	Urban areas

8.4.5 In May 2006 a sub-group review of the EBAP added some new species and habitats for which plans are being drawn up, and the review also set out to include targets and actions at a district level where appropriate.⁹⁶ The five flagship species selected for the wider Harlow area and their associated targets as set out in the EBAP are:⁹⁷

- Sky Lark – maintain and where possible enlarge the population in Essex;
- Bats – maintain existing population and range of pipistrelles;
- Great Crested Newt – ascertain and maintain the range distribution and viability of the existing county population and restore some population to counter past losses;
- Bee Orchid;
- Desmoulin's Whorl Snail – ensure identified populations are protected maintained and enhanced; determine true county distribution.

⁹⁴ Chris Blandford Associates on behalf of Harlow Council (2005) *Green Infrastructure Plan* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=8615> (accessed 13 August 2009).

⁹⁵ Essex Biodiversity Project (undated) *Essex Biodiversity Action Plan* [online] available at: <http://www.essexbiodiversity.org.uk/Default.aspx?pageid=47> (accessed 13 August 2009).

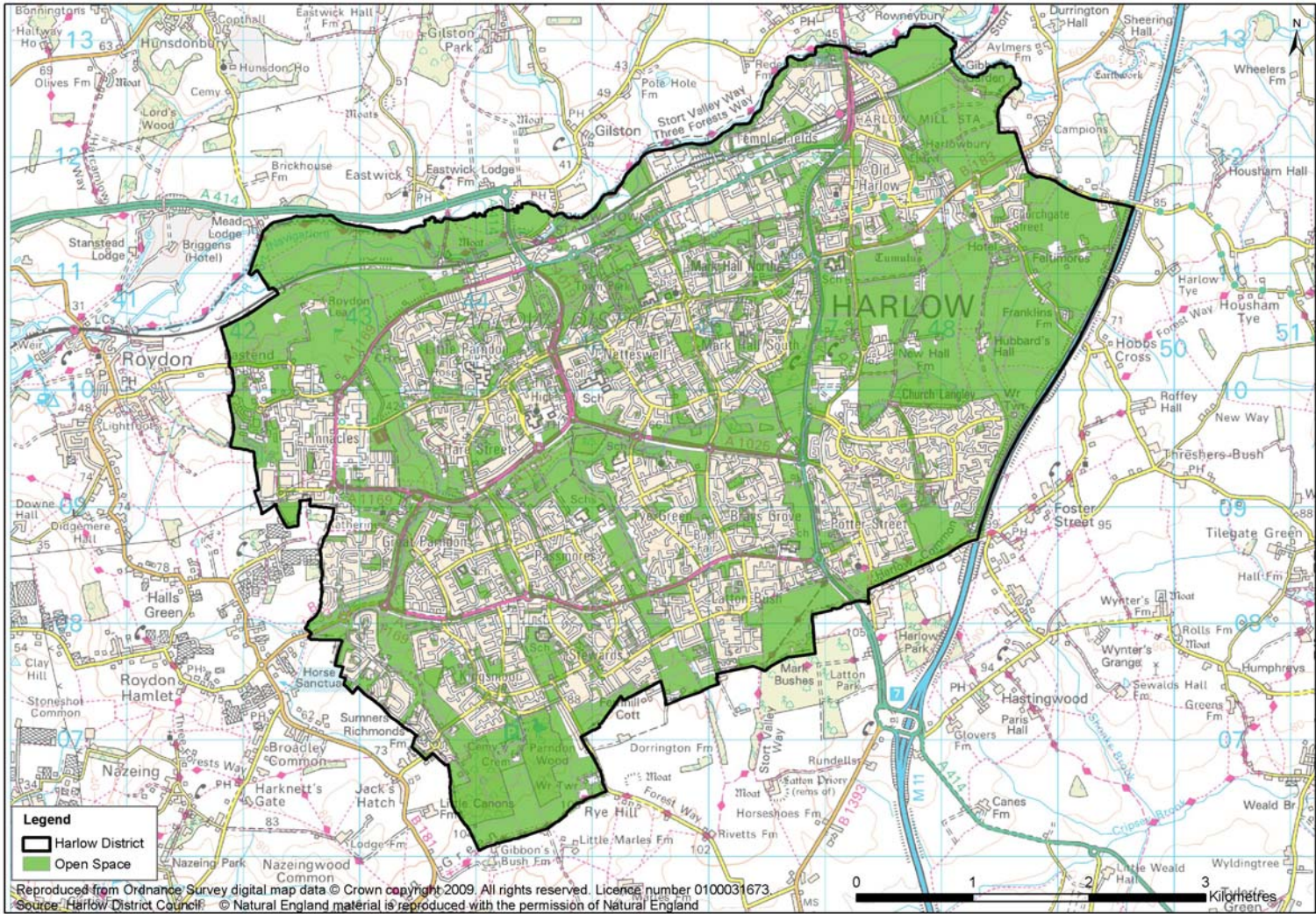
⁹⁶ Essex Biodiversity Project (undated) *Essex Biodiversity Action Plan* [online] available at: <http://www.essexbiodiversity.org.uk/Default.aspx?pageid=47> (accessed 13 August 2009).

⁹⁷ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 13 August 2009).

- 8.4.6 Harlow, although an urban area, contains a number of green spaces of particular importance to community well-being. Figure 5 illustrates the large area of Harlow that is designated as Open Spaces and Figure 6 illustrates that these open spaces have a variable degree of natural status. In addition to Green Wedges and Green Belt (see Chapter 14 Land), the town also contains a Town Park and other smaller green spaces of 'internal open space' exist within the residential and business areas of the town in addition to areas of 'incidental open space'.⁹⁸

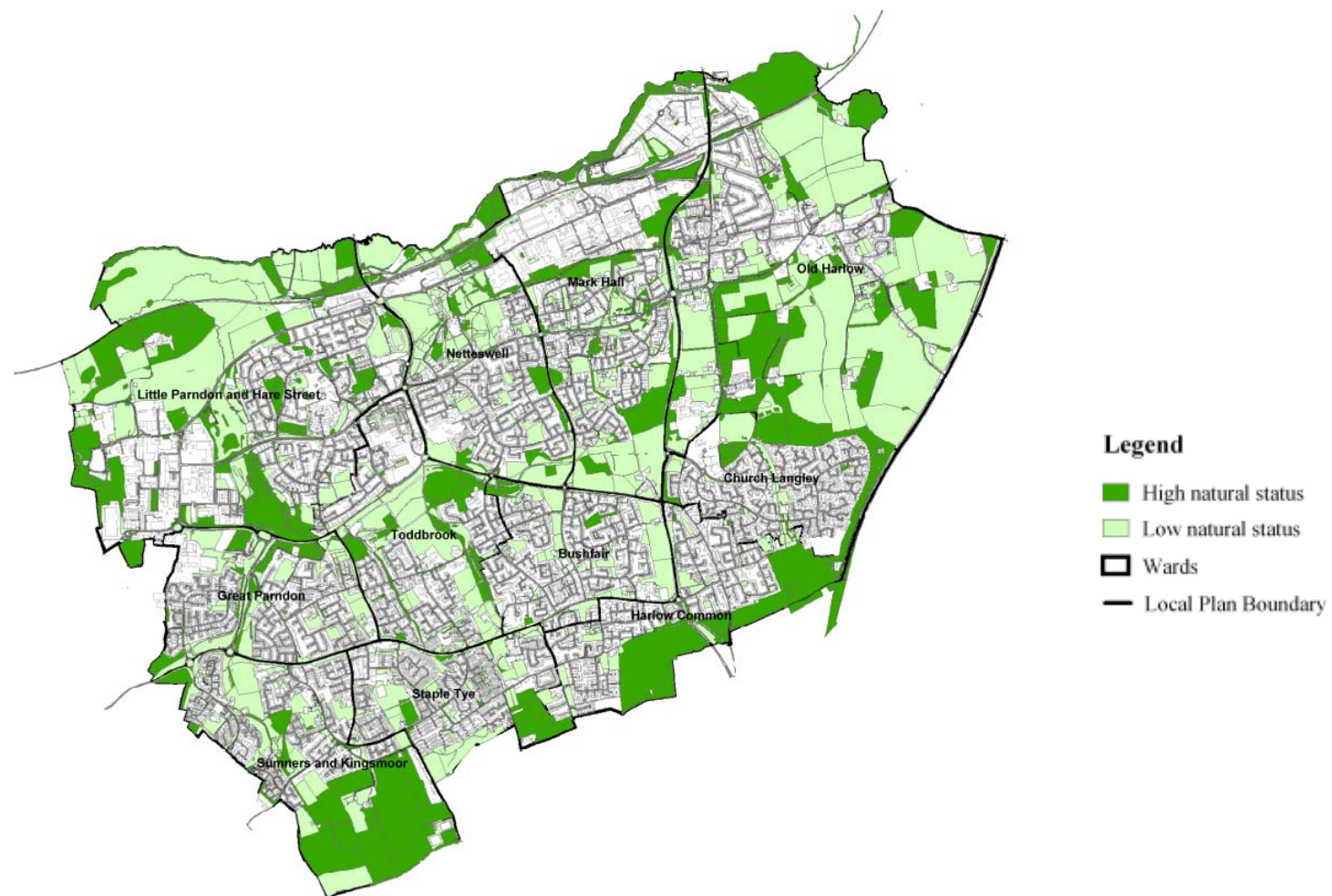
⁹⁸ Nortoft et al. on behalf of Harlow Council (2004) *Harlow District Council Green Spaces Strategy*. [not available]

Figure 5: Open Spaces designation in Harlow



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Figure 6: Natural status of open space⁹⁹



⁹⁹ Provided by Harlow Council from the 2004 'Harlow District Council Green Spaces Strategy'.

Are there any evidence gaps?

8.4.7 Evidence gaps include:

- No monitoring information for change in priority habitats and species (by type) and areas designated for their intrinsic environmental value.
- Harlow has set up a database for Biodiversity to enable the monitoring of biodiversity in the town. This database includes maps for wildlife sites, bee orchids and wildlife verges; and it is in the process of being expanded to include the great crested newt survey and veteran trees.

8.5 What will be the situation without the plan? (the 'business-as-usual' option)

8.5.1 The East of England Biodiversity Delivery Plan 2008 – 2015 recognises that the region is currently at a turning point for the natural environment. Green surroundings are also attributed with improving economy, health and wellbeing.¹⁰⁰ The availability of recreational access to biodiversity is particularly important in terms of health and quality of life, but considerable potential exists for recreation to have significant impacts on biodiversity and habitats. Poor natural environments are characterised by simplified land use, lack of diversity (from habitats and species, to culture and local identity) and fragmented, incoherent patches semi-natural habitats. As well as being ecologically less resilient, a landscape of disconnected fragments is also less likely to be valued by people as it lacks the aesthetic appeal, opportunities for recreation and historical and other features linked to a sense of local identity.¹⁰¹ Careful strategic planning and a Core Strategy for Harlow can help mitigate these impacts and is particularly important where European designated sites or more susceptible habitats are involved.

8.5.2 If housing growth is not considered alongside green infrastructure then it will probably result in a detrimental impact on the natural environment and local community, and the potential for maximal benefits will not be achieved.¹⁰² Moreover, without active intervention through the Core Strategy it is not clear whether the green infrastructure requirements described by the East of England Plan will be met. Meeting targets set by the EBAP for Harlow District (e.g. for the Urban habitat and associated BAP species) may also be more difficult.

8.6 What issues should be a particular focus for the appraisal?

8.6.1 In light of the information above, key issues to take into account in the appraisal in relation to biodiversity and green infrastructure include:

- The need to conserve and enhance biodiversity in Harlow (informed by the Essex BAP)
- The need to consider the incorporation of biodiversity enhancements and green infrastructure through SuDS design

¹⁰⁰ East of England Biodiversity Forum (2008) *East of England Biodiversity Delivery Plan* [not yet available online]

¹⁰¹ Natural England (2008) *State of the Natural Environment 2008* [online] available at: <http://www.naturalengland.org.uk/publications/sona/default.aspx> (accessed 13 August 2009).

¹⁰² Natural England (2008) *Natural England's Green Infrastructure and Housing Growth Policy* [online] available at: http://www.naturalengland.org.uk/Images/Housing%20and%20GI%20policy_tcm6-9324.pdf (accessed 13 August 2009).

- The need to consider the importance of Green Wedges and green infrastructure to the town's aesthetic appeal and sense of community
- The importance of strategic planning to safeguard biodiversity, habitats and European sites placed at risk by recreation and development. (e.g. planning for new recreational resources to buffer increased demand for access to the more sensitive sites)
- The recreational, health and general community well-being advantages that biodiversity and green infrastructure can provide.

9 Climate change (mitigation and adaptation)

9.1 Introduction

9.1.1 Climate change has become a key issue. Lord Nicholas Stern has suggested that, worldwide, climate change could reduce GDP by 20% unless it is actively tackled now¹⁰³. According to the 2009 UK Climate Projections¹⁰⁴:

- All areas of the UK will get warmer (with the warming greater in summer than in winter).
- There is little change in the amount of precipitation (rain, hail, snow etc) that falls annually, but it is likely that more of it will fall in the winter, with drier summers, for much of the UK.
- Sea levels rise (greater in the south of the UK than the north).

9.1.2 As a result, there will be permanent changes in the natural environment and increasingly, substantial challenges to national prosperity and social cohesion at the local level. The Government's principal concern for sustainable development has now filtered down to local authorities and climate change mitigation is being encouraged through promoting measures to reduce greenhouse gas emissions.

9.1.3 Government guidance on flood risk emphasises that although flooding cannot be wholly prevented, its impacts can be avoided and reduced through good planning and management. As a consequence of climate change, the Pitt Review into the 2007 floods emphasised that flood risk is here to stay. Flooding from all sources is expected to increase with climate change.

9.2 What's the policy context?

9.2.1 The Climate Change Act 2008¹⁰⁵ sets targets for green house gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline. The East of England Plan states that to help meet national targets for reducing climate change emissions DPDs should set ambitious proportions of the energy supply that new developments must secure through decentralised and renewable or low-carbon sources. Additionally, until these DPDs are set "new development of more than 10 dwellings or 1000m² of non-residential floorspace should secure at least 10% of their energy from decentralised and renewable or low-carbon sources, unless this is not feasible or viable." By 2010, 10% of the region's energy and by 2020, 17% of the region's energy should come from renewable sources. Essex has set a county-wide target of 11.8% reduction in CO₂ emissions by 2001/12 from the 2005 figure of 6.7 CO₂ tonnes per capita. This target is set under National Indicator (NI) 186, which is concerned with a per capita reduction in CO₂ emissions within the local authority area and includes emissions from all domestic housing, business and public sectors, and road traffic with the exception of motorways. The County Council is also working to reduce the council's carbon footprint, as an LAA target, through the Local Authority Carbon Management Programme. The County Council aims to reduce

¹⁰³ Stern, N. (2006) *Stern Review on the economics of climate change* [online] available at: http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/stern_review_report.cfm (accessed 23 June 2009).

¹⁰⁴ Defra (2009) *UK Climate Projections* [online] available at: <http://ukcp09.defra.gov.uk/> (accessed 16 July 2009).

¹⁰⁵ The Climate Change Act 2008 is available at: <http://www.defra.gov.uk/environment/climatechange/uk/legislation/> (accessed 17 July 2009).

- business miles by 10% and in so doing to annually cut carbon emissions by 3%. NI 185 is concerned with the reduction of CO₂ emissions from local authority operations.¹⁰⁶
- 9.2.2 National Indicator (188) covers planning to adapt to climate change. All local authorities must complete a climate change adaptation plan. This is a new indicator and Harlow has set a level of preparedness target for 2010/11 of 1 and for 2011/12 of 2.¹⁰⁷
- 9.2.3 PPS1 supplement on Planning and Climate Change¹⁰⁸ requires local authorities to mitigate and adapt to climate change through appropriate location and patterns of development, promoting the reduction of the use of the car, conserving and enhancing biodiversity and ensuring that new development is resilient to the effects of climate change. PPS22 on Renewable Energy¹⁰⁹ includes a requirement for local authorities to allocate specific sites for renewable energy and to encourage developers to provide on-site renewable energy generation as appropriate. The Code for Sustainable Homes¹¹⁰ sets out the national standard for sustainable design and construction of new homes. From April 2008, achieving Level 3 of the Code became mandatory for new social housing developments. From 2010 all new residential developments will have to meet the equivalent of Level 3 of the Code for Energy Use under the Building Regulations. The Building Regulations for energy use for new residential development will be progressively tightened requiring buildings to be effectively 'carbon neutral' from 2016 onwards, which is equivalent to Level 5/6 of the Code. In terms of carbon emissions Level 3 equals a 25% energy/carbon improvement relative to current 2006 standards in the Building Regulations. New housing developments will have to comply with Level 4 by 2013 (44% energy/carbon improvement relative to current 2006 standards in the Building Regulations) and Level 5 by 2016 (zero carbon). Harlow Council has set out a Sustainability Strategy High Level Action Plan¹¹¹ with targets to accompany its Sustainability Strategy and Action Plan 2009/2010. Harlow's Plan aims to address the priority indicators of the Government Strategy, including indicator 2 of 4 'climate change and energy'.¹¹² Harlow Council has also signed the Nottingham Declaration on Climate Change – a commitment to work in a way that counteracts climate change.¹¹³
- 9.2.4 The East of England has a target to produce 14% of its electricity needs from renewable sources by 2010. This target is set at 9% for Essex.¹¹⁴

¹⁰⁶ EERA (2009) *Report to the East of England Regional Assembly: Environment & Resources Panel - National Indicators 185 & 186 and Local Area Agreements* [online] available at: <http://www.eera.gov.uk/GetAsset.aspx?id=fAAyADAMAgAwAHwAfABGAGEAbABzAGUAfAB8ADAAfAA1> (accessed 14 August 2009).

¹⁰⁷ Harlow Council (2009) Report to Audit Committee 23 June 2009 – Corporate Performance Indicator [online] available at: <http://www.harlow.gov.uk/pdf/Targets%20for%20A%20and%20I%2023%2006%20091.pdf> (accessed 1 February 2010).

¹⁰⁸ Communities and Local Government (2007) *Planning Policy Statement: Planning and Climate Change* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/ppsclimatechange.pdf> (accessed 16 June 2009).

¹⁰⁹ ODPN (2004) *Planning Policy Statement 22: Renewable Energy* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps22> (accessed 17 June 2009).

¹¹⁰ CLG (2008) *The Code for Sustainable Homes: setting the standard in sustainability for new homes* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/codesustainablehomesstandard.pdf> (accessed 17 June 2009).

¹¹¹ Harlow Council (2009) *Sustainability Strategy High Level Action Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy/achievements_so_far/high_level_action_plan.aspx (accessed 14 August 2009).

¹¹² Harlow Council (2009) *Sustainability Strategy and Action Plan 2009/2010* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy/introduction.aspx (accessed 14 August 2009).

¹¹³ Harlow Council (2009) *Energy Efficiency* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/health/energy_efficiency.aspx (accessed 14 August 2009).

¹¹⁴ Hams, T. et al (2001) *Making Renewable Energy a Reality – Setting a Challenging Target for the Eastern Region: A report to the East of England Sustainable Development Round Table* [online] available at: <http://www.sustainabilityeast.org.uk/pdf/Renewables%20Report.pdf> (accessed 14 August 2009).

9.2.5 The East of England Plan¹¹⁵ includes policies which address both climate change mitigation and adaptation. In terms of energy, one of the Plan's objectives is "*to reduce the region's impact on, and exposure to, the effects of climate change by...maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources.*" **Policy ENG1:** Carbon Dioxide Emissions and Energy Performance highlights the roles played by both location and design to optimise carbon performance and **Policy ENG2:** Renewable Energy Targets supports the development of new facilities for renewable energy power generation.

9.2.6 Water efficiency is also essential for climate change adaptation/mitigation and is covered in Chapter 17: Water.

Flood Risk

9.2.7 Planning Policy Statement 25 (PPS25)¹¹⁶ sets out Government policy on development and flood risk. Its aims are to ensure that flood risk is taken into account at all stages in the planning process, to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk. Where new development is, exceptionally, necessary in such areas, the policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. PPS25 requires a Strategic Flood Risk Assessment (SFRA) to be carried out to inform the sustainability appraisal and preparation of the authority's Local Development Documents (LDDs). A joint SFRA is being undertaken by Harlow and Epping Forest local authorities. The aim of an SFRA is to provide a detailed and robust assessment of the extent and nature of the risk of flooding and its implications for land use planning. In addition, the SFRA sets the criteria with respect to flood risk for the submission of planning applications and for guiding subsequent development control decisions.

9.2.8 **Policy WAT 4:** Flood Risk Management of the East of England Plan¹¹⁷ identifies the significant risk of coastal and river flooding in parts of the East of England and emphasises priorities to defend existing properties from flooding and locate new development where there is little or no risk of flooding. In addition, **Policy ENV1:** Green Infrastructure recognises the contributions of green infrastructure towards flood alleviation, including the Lea Valley Regional Park. **Policy ENV3:** Biodiversity and Earth Heritage promotes the restoration and re-establishment of habitats and wildlife corridors.

9.2.9 The East of England Regional Flood Risk Appraisal (RFRA)¹¹⁸ was commissioned in line with PPS25, to inform the preparation and sustainability appraisal of the East of England Plan. The RFRA provides policy guidance and technical information to include mapping of flood risk. The RFRA states that:

"Climate change is likely to cause a combination of higher peak river flows and higher tide levels increasing the frequency and extent of flooding in the East of England. Approximately 40,000 properties and 86,000 people in the region are expected to be at risk from the future 1% AEP fluvial flood event."

¹¹⁵ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/ (accessed 14 August 2009).

¹¹⁶ Communities and Local Government (2006) *Planning Policy Statement 25: Development and Flood Risk* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps25floodrisk> (accessed 15 July 2009).

¹¹⁷ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/ (accessed 14 August 2009).

¹¹⁸ Capita Symonds on behalf of EERA (2009) *Regional Flood Risk Appraisal* [online] available at: <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/regional-flood-risk-appraisal/> (accessed 14 August 2009).

- 9.2.10 The Thames Catchment Flood Management Plan (CFMP) provides a strategic overview of flood risk management issues for specific river catchments. It is a long-term plan for the next 50-100 years and provides the basis for Flood Risk Management investment plans. Harlow District falls within the Thames CFMP.¹¹⁹ Approximately 5,200 properties are at risk of flooding from the 1% AEP fluvial event in the Thames CFMP area that is within the RFRA boundary.
- 9.2.11 The Middle Lee and Stort policy unit is covered by policy P6 – take action to increase frequency of flooding to deliver benefits locally or elsewhere. The flood risk management approach for this type of catchment includes; maintaining the capacity of the natural floodplain to retain water and maintain the conveyance of watercourses in the towns and villages; refurbishment of buildings and redevelopment of industrial areas in the floodplain offers the opportunity to increase resilience; the importance of individual action. Actions include:
- ML1 – Making space for water
 - ML2 – Efficient and effective targeting of maintenance
 - ML3 – Flood warning, flood awareness and emergency planning
 - ML4 – Short-term land use planning
 - ML5 – Long-term adaptation of the urban environment to be more flood resilience
 - ML6 – Safeguard future opportunities to reduce the probability of flooding in the future
 - ML7 – Water level management
- 9.2.12 As Harlow is a Key Centre for Development and Change (KCDC) identified to concentrate regional growth as identified in the East of England Plan, information on flood risk within each KCDC was used to outline flood risk and inform policies. Harlow has been assigned to CFMP policy 6; *“take action with others to store water or manage run-off in locations that provide overall flood risk reduction or environmental benefits, locally or elsewhere in the catchment”*.¹²⁰

9.3 What are the key objectives and other decision-making criteria that we need to consider?

- 9.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow’s town centre. Particularly relevant objectives include:
- Promote sustainable growth within environmental limits
 - Reduce greenhouse gas emissions
 - Adapt to the impacts of climate change
 - Increase resource efficiency and reduce resource use and waste
 - Move goods and people sustainably
 - Provide decent, affordable and safe homes for all.

¹¹⁹ Environment Agency (2008) *Thames Region Catchment Flood Management Plan (CFMP)* [online] available at: <http://www.environment-agency.gov.uk/research/planning/33592.aspx> (accessed 14 August 2009).

¹²⁰ Capita Symonds on behalf of EERA (2009) *Regional Flood Risk Appraisal* [online] available at: <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/regional-flood-risk-appraisal/> (accessed 14 August 2009).

9.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee:¹²¹ Relevant priorities include:

- Promoting a clean, green, healthy and safe environment
- Developing good citizenship.

9.4 What's the situation now? (including any existing problems)

9.4.1 Harlow District does not generate any renewable energy towards the 9% county target and it is considered to be a poor location for wind-generated power. There is no target in Harlow for the incorporation of renewable energy within new developments, nor were there any applications during the period 2007-8, however; the Annual Monitoring Report (2007-8) states that "*Local Plan Policy actively supports new developments incorporating renewable energy*".¹²²

9.4.2 Harlow produced 597 kt of carbon dioxide in 2005 and again in 2006. This equates to per capita emissions of 7.65 t. The per capita figure is higher than the county average of 7 t and lower than the regional average of, respectively, 8.11 t and 8.09 t. Particularly noticeable for the District is that most (more than half) of the emissions in Harlow come from industry and commercial sources and much less from road transport.¹²³ (See Table 5). In 2005, the highest percentage of total CO₂ emissions in the region by far came from Essex with 27% of the total.¹²⁴

Table 5: CO₂ emissions in 2006¹²⁵

Area	Industry and Commercial (kt CO ₂) 2006	Domestic (kt CO ₂) 2006	Road Transport (kt CO ₂) 2006	Total 2005/2006	Per capita emissions (tonnes of CO ₂) 2006
Harlow District	338 (57%)	178 (30%)	81 (14%)	597	7.65
Essex	3,168 (32%)	3,445 (35%)	3,184 (33%)	9,787	7
East of England	16,902 (37%)	13,912 (31%)	13,966 (31%)	45,372	8.09

9.4.3 Harlow falls within the catchment of the Rye Meads WwTW. The Rye Meads Water Cycle Strategy highlights the potential for water neutrality if enough water resources capacity is unlocked (where demand for water does not increase following development). Demand reduction across all dwellings uses less energy, reduces adverse impacts on water resources

¹²¹ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

¹²² Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 14 August 2009).

¹²³ Defra (2008) *Local government performance framework* [online] available at: <http://www.defra.gov.uk/environment/statistics/globalmos/download/regionalrpt/local-regionalco2-ni186indicator.xls> (accessed 4 August 2009).

¹²⁴ Environment Agency (2009) *State of the Environment - East of England: Climate Change* [online] available at: <http://publications.environment-agency.gov.uk/pdf/GEAN0309BPUC-e-e.pdf> (accessed 14 August 2009).

¹²⁵ Adapted from: Defra (2006) *Local Government Indicators* (data) [online] available at: <http://www.defra.gov.uk/environment/statistics/globalmos/galocalghg.htm> (accessed 13 August 2009). Note: LULUCF emissions form part of the total but are not recorded within this table.

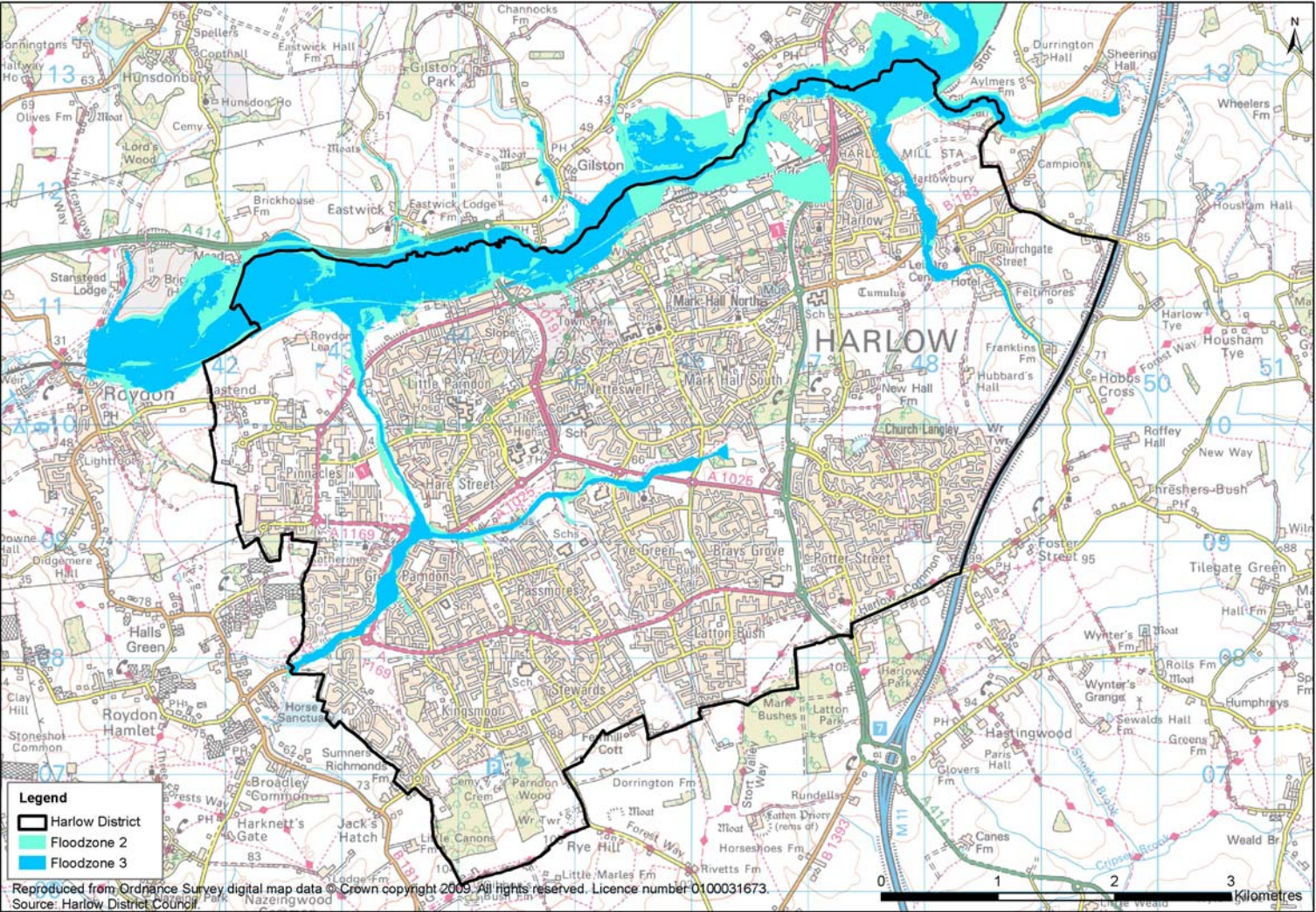
and “provides a greater safety margin against future uncertainties such as climate change and pollution events”.¹²⁶

Flood Risk

9.4.4 Figure 7 depicts areas of flood risk within Harlow.

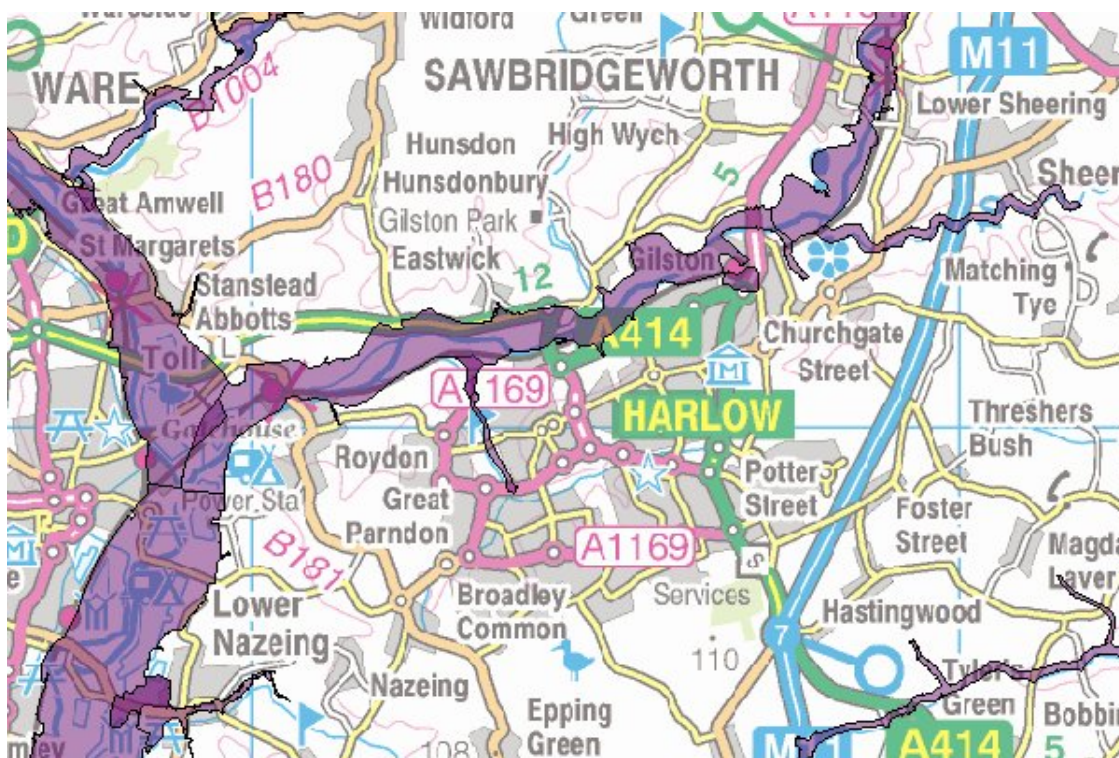
¹²⁶ Hyder Consulting (UK) Limited (2009) *Rye Meads Water Cycle Strategy 2009* [online] available at: <http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/rye%20meads%20water%20cycle%20strategy.aspx> (accessed 1 February 2010).

Figure 7: Harlow flood risk



- 9.4.5 There is no SFRA for Harlow District. The district is located within the Thames River Basin District and, more specifically, within the Upper Lee Water Framework Directive Management Catchment area¹²⁷ and the River Stort catchment area¹²⁸. Although information is not available for Harlow alone, the KCDC of Harlow is located across four policy units within the Thames CFMP: Middle Lee & Stort; Upper Roding, Lower Lee tribs and Lower Lee policy units. 89% of the KCDC area is in Flood Zone 1.¹²⁹
- 9.4.6 The River Stort places the north of Harlow and, within the ward of Hare Street and Little Parndon, the area between the Pinnacles and Little Parndon / Hare Street (Cannons Brook); in an Environment Agency flood warning area.¹³⁰ (See Figure 8). This area corresponds to an area of Flood Risk Zone 3 (high risk of flooding).

Figure 8: Harlow Flood Warning Area¹³¹



- 9.4.7 The River Stort flows through Sawbridgeworth and along the north of Harlow before flowing into the River Lee at Hoddesdon. Harlow benefits from flood defences which offer a standard of protection of between 10% and 1% annual exceedance probability event (AEP). EERA states that, although the River Stort flood extents are fairly wide, “the majority of Harlow is south of current the floodplain”. However: “In the future the area south of the river around Temple Fields will be within Flood Zone 3... A significantly larger proportion of this area [to the west of

¹²⁷ Environment Agency (2008) *Thames Region Catchment Flood Management Plan (CFMP)* [online] available at: <http://www.environment-agency.gov.uk/research/planning/33592.aspx> (accessed 14 August 2009).

¹²⁸ East Herts District Council (2008) *Strategic Flood Risk Assessment* [online] available at: http://80.168.51.108/media/pdf/i/East_Herts_SFRA_16_10_08FINAL.pdf (accessed 13 August 2009).

¹²⁹ Capita Symonds on behalf of EERA (2009) *Regional Flood Risk Appraisal* [online] available at: <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/regional-flood-risk-appraisal/> (accessed 14 August 2009).

¹³⁰ Environment Agency (2009) *Flood Warnings FWA Detail - The River Stort at Harlow including Roydon* [online] available at: <http://www.environment-agency.gov.uk/homeandleisure/floods/34681.aspx?area=062FWF51Harlow> (accessed 14 August 2009).

¹³¹ Source: Crown copyright. All rights reserved. Environment Agency, 100026380, 2008

Harlow at the confluence of the River Stort and River Lee] *will be at risk of flooding due to climate change as the flood extents become wider.*¹³²

- 9.4.8 Previous scoping work for Rye Meads Water Cycle Strategy highlighted that the sewerage network may not have capacity for the proposed development which could result in an increase in flooding and pollution from sewers in the catchment area. Sewerage infrastructure upgrades will be required in Harlow to accommodate planned strategic scale new development. The WCS highlights the need for developers to incorporate SuDS in order to better control surface water run-off and therefore reduce flood risk as well as pollution risk.¹³³

Are there any evidence gaps?

- 9.4.9 Evidence gaps include:

- An SFRA for Harlow District and Epping Forest District is pending.
- There is a lack of data on carbon emissions and both existing and potential renewables (other than wind power) within the District.

9.5 What will be the situation without the plan? (the ‘business-as-usual’ option)

- 9.5.1 The District already has limited existing renewable energy and needs to assess the potential for different forms of renewable energy. Lower carbon emissions and greater use of sustainable forms of energy could be driven by a Core Strategy, without which this may not take place and the District will continue to not contribute towards the county (and regional) target. Assuming that a renewables study is conducted, planning for the use of renewables within new developments and other forms of renewables (e.g. energy from waste) may be overlooked without the guidance of a plan. It may also be anticipated that CO₂ emissions for the District will continue to rise and may not be abated or mitigated to the same extent as under a Core Strategy.
- 9.5.2 Climate change is anticipated to have a major effect on the extent and frequency of future flooding.¹³⁴ Indeed, the RFRA states that: *“Demand for more housing is likely to put increased pressure on surface water and sewer drainage systems. The flooding situation will get worse as sewers reach the limits of their capacity and flood more frequently.”*¹³⁵ Areas of Harlow District that are located within Flood Risk Zone 3 will be particularly at risk from flooding and, without the plan, the effects of climate change may be more severe and the District less well prepared through missed adaptation opportunities and unforeseen mitigation opportunities.

¹³² Capita Symonds on behalf of EERA (2009) *Regional Flood Risk Appraisal* [online] available at: <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/regional-flood-risk-appraisal/> (accessed 14 August 2009).

¹³³ Hyder Consulting (UK) Limited (2009) *Rye Meads Water Cycle Strategy 2009* [online] available at: <http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/rye%20meads%20water%20cycle%20strategy.aspx> (accessed 1 February 2010).

¹³⁴ Environment Agency (2008) *Thames Region Catchment Flood Management Plan (CFMP)* [online] available at: <http://www.environment-agency.gov.uk/research/planning/33592.aspx> (accessed 14 August 2009).

¹³⁵ Capita Symonds on behalf of EERA (2009) *Regional Flood Risk Appraisal* [online] available at: <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/regional-flood-risk-appraisal/> (accessed 14 August 2009).

9.6 What issues should be a particular focus for the appraisal?

9.6.1 In light of the information above, key issues to take into account in the appraisal in relation to climate change and flood risk include:

- The need to lower GHG emissions
- The need to explore alternative ways to increase the amount of energy generated by decentralised or renewable sources and the use of renewable sources of energy by new development
- The impact of development on surface water flooding
- Development within the areas at risk of flooding, adaptation and the mitigation of flood risk, this includes taking into account SFRA findings
- The need to consider SuDS design measures and how they may contribute to climate change adaptation and reducing flood risk.

10 Community and wellbeing

10.1 Introduction

- 10.1.1 The Department for Communities and Local Government (CLG)¹³⁶ has defined sustainable communities as: *“...places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all”*.
- 10.1.2 As such, sustainable communities embody the principles of sustainable development by: *“balancing and integrating the social, economic and environmental components of their community, meeting the needs of existing and future generations and respecting the needs of other communities in the wider region or internationally to make their own communities sustainable”*.
- 10.1.3 Social inclusion is a key aspect of sustainable communities and many interlinked factors are important in ensuring that individuals and areas are able to fully participate in society. Factors such as low income poverty and unemployment can be compounded by poor housing, high crime, discrimination, bad health and family breakdown. A combination of problems can create a vicious cycle and lead to social exclusion. *“Social exclusion can happen as a result of problems that face one person in their life. But it can also start from birth. Being born into poverty or to parents with low skills still has a major influence on future life chances”*.
- 10.1.4 Community wellbeing is therefore influenced by a number of crosscutting factors. This section focuses on many of these, including equalities, health, education, safety, and deprivation.

10.2 What's the policy context?

- 10.2.1 Sustainable Communities: Building for the Future¹³⁷ (the ‘Sustainable Communities Plan’) was launched in 2003 and sets out a long-term programme of action for delivering sustainable communities in urban and rural areas. The main aspects are:
- addressing housing shortage, comprised of accelerating the provision of housing, affordable housing and tackling homelessness;
 - addressing low demand and abandonment;
 - ensuring all social housing is brought up to a decent standard by 2010;
 - improving the local environment of all communities (liveability); and
 - protecting the countryside and using land more effectively.
- 10.2.2 PPS1: Delivering Sustainable Development¹³⁸ sets out the overarching planning policies on the delivery of sustainable development through the planning system; stresses the importance of a

¹³⁶ CLG (2003) *Sustainable Communities: Building for the Future* [online] available at: <http://www.communities.gov.uk/publications/communities/sustainablecommunitiesbuilding> (accessed 18 June 2009).

¹³⁷ CLG (2003) *Sustainable Communities: Building for the Future* [online] available at: <http://www.communities.gov.uk/publications/communities/sustainablecommunitiesbuilding> (accessed 18 June 2009).

¹³⁸ ODPM (2005) *Planning Policy Statement 1: Delivering Sustainable Development* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement1.pdf> (accessed 18 June 2009).

strong, stable and productive economy and requires LPAs to ensure that the necessary infrastructure is provided to support new and existing development and housing. It also states that accessibility to jobs and services should be addressed as a means of achieving social cohesion and inclusion. PPS3: Housing¹³⁹ emphasises that housing developments should be in suitable locations, which offer a good range of community facilities and good access to jobs, services and infrastructure. The Government's White Paper, Strong and Prosperous Communities¹⁴⁰ introduced a new performance framework tailored to the local needs through the Local Area Agreement and encourages councils to develop neighbourhood charters setting out local standards and priorities. The White Paper also calls for more accountable and responsive local government, a greater role for community participation in decision-making and an enhanced role for community groups.

- 10.2.3 The Government's strategy for neighbourhood renewal – A New Commitment to Neighbourhood Renewal (2001) – included a commitment to social inclusion and that within 10 to 20 years no one should be seriously disadvantaged by where they live. This should be done by addressing the underlying problems of declining areas such as high unemployment, weak economies and poor schools and using Local Strategic Partnerships (LSPs) to unite public, private, community and voluntary sector and drive change forward.
- 10.2.4 The overall spatial vision of the East of England Plan¹⁴¹ refers to meeting housing needs in 'sustainable inclusive communities'. Policies with relevance to this Topic include **Policy SS1**: Achieving Sustainable Development which recognises sustainable development incorporates a commitment to a 'strong, healthy and just society'. **Policy ENV7**: Quality in the Built Environment directs new developments to "address crime prevention, community safety and public health". In addition, several policies directly address the challenge of deprivation.
- 10.2.5 **Policy SS3** of the East of England Plan¹⁴² identifies Harlow as a **Key Centre for Development and Change** (KCDC). KCDCs are intended to reflect the "polycentric nature of the East of England" and its arrangement of small and medium sized towns and cities surrounded by more rural areas which look to those towns for employment and higher level services. Harlow is therefore identified as a main driver of economic growth in the region where there is potential to build on existing social infrastructure.¹⁴³ **Policy SS5**: Priority Areas for Regeneration of the Plan identifies Harlow as a town with significant areas of deprivation, stating that LDDs and relevant non-statutory plans should set out policies to tackle the problems of economic, social and environmental deprivation.
- 10.2.6 Harlow's Local Strategic Partnership has developed the District's Community Strategy which must be taken into account when preparing the LDF. The Strategy is known as the Harlow 2020 Vision¹⁴⁴, which aims for Harlow to be:

¹³⁹ ODPM (2000) *Planning Policy Statement 3: Housing* [online] available at:

<http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> (accessed 17 July 2009).

¹⁴⁰ CLG (2006) *Strong and Prosperous Communities - The Local Government White Paper* [online] available at:

<http://www.communities.gov.uk/publications/localgovernment/strongprosperous> (accessed 17 July 2009).

¹⁴¹ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/ (accessed 14 August 2009).

¹⁴² GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/ (accessed 18 August 2009).

¹⁴³ Capita Symonds on behalf of EERA (2009) *Regional Flood Risk Appraisal* [online] available at:

<http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/regional-flood-risk-appraisal/> (accessed 14 August 2009).

¹⁴⁴ Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 18 August 2009).

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

- 10.2.7 To deliver the Vision a number of priorities have been set out to address key issues relevant to the Town:
- Economic Prosperity
 - Education, Learning and Skills
 - Free Time
 - Health and Wellbeing
 - Homes and Neighbourhoods
 - Transport
 - Children and Young People - The Harlow Children and Young People Strategic Partnership (CYPSP)
 - Crime and Community Safety – The Safer Harlow Partnership.
- 10.2.8 It is intended that the Green Infrastructure Plan¹⁴⁵ will be reflected in Community Strategies prepared by Harlow District Council and other surrounding Councils, in order to promote it as a key initiative within local authority community development programmes.
- 10.2.9 Since designation as a New Town in 1947, Harlow – now a former new town – has experienced a gradual urban decay accompanied by a decline in economic fortunes and a rise in social exclusion and deprivation.¹⁴⁶ For this reason, regeneration has been a priority of Harlow Council. The Harlow Regeneration Strategy¹⁴⁷ was developed to ensure that renewal continues to move ahead in Harlow before full implementation the East of England Plan and to allow the District to take full advantage of the Plan. The Strategy sets out three overlapping phases of work within a 'timeline for change' for the period until 2021:
1. Establishing regeneration building blocks
 2. Investing in potential
 3. Delivering the benefits of growth
- 10.2.10 A draft Harlow Regeneration Strategy (2009-2021)¹⁴⁸ is being developed. The revised Strategy will build upon the key themes and evidence base identified in the 2007 Strategy to deliver a geographically targeted approach in addition to addressing issues of town wide significance.
- 10.2.11 Local area agreements (LAAs) are three-year agreements setting out local priorities primarily to deliver *"genuinely sustainable communities through better outcomes for local people"*. Following the 2006 local government white paper 'Strong and Prosperous Communities', LAA

¹⁴⁵ Chris Blandford Associates on behalf of Harlow Council (2005) *Green Infrastructure Plan* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=8615> (accessed 18 August 2009).

¹⁴⁶ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁴⁷ Harlow Council (2007) *Regeneration Strategy and Implementation Plan 2007-2009* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁴⁸ Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

delivery will be measured by a single national performance framework of 198 national indicators (NIs). The Local Strategic Partnership for Essex has selected NIs as 'designated targets' that reflect some of the aims set out in the Harlow 2020 Vision 2006-09.¹⁴⁹

EqIA Policy Context

- 10.2.12 The Equality Act (2006) and other equality legislation introduce specific measures to protect equality groups from discrimination and to promote equality of opportunity for them.
- 10.2.13 Legislation on Age Discrimination, which came into effect in October 2006, Employment Equality (Age) Regulations 2006, prohibit unjustified direct and indirect age discrimination, and all harassment and victimisation on grounds of age, of people of any age, young or old in relation to employment and provision of education.
- 10.2.14 From December 2006 The Disability Discrimination Act (DDA) 1995 was amended to place a duty on all public bodies to promote disability equality - the Disability Equality Duty. This legal duty requires all public bodies to actively look at ways of ensuring that disabled people are treated equally.
- 10.2.15 The Equal Pay Act (EPA) 1970 legislates for parity in pay and benefits for individuals, regardless of their sex, in the same employment, where the individual is doing like work.
- 10.2.16 The Sex Discrimination Act (SDA) 1975 prohibits sex discrimination against individuals in areas such as education, employment and in the provision of services, goods and facilities. The SDA applies to women and men of all ages, and children. The Equality Act includes amendments to the SDA.
- 10.2.17 The Race Relations Act 1976, which was amended by the Race Relations (Amendment) Act 2000, forms the legal foundation of protection from racial discrimination in the fields of employment, education, training, housing and the provision of goods, facilities and services. The Race Relations (Amendment) Act 2000 gives public authorities general and specific duties. The general duty is that public authorities must make the promotion of racial equality central to their work.
- 10.2.18 The Employment Equality (Religion or Belief) Regulations 2003, as amended by the Equality Act 2006, make it illegal to discrimination on the grounds of religion or belief in the areas of employment and vocational training.
- 10.2.19 The Employment Equality (Sexual Orientation) Regulations 2003 prohibit discrimination on grounds of sexual orientation in employment and vocational training.
- 10.2.20 The Civil Partnership Act (2004) gives same-sex couples the opportunity to form a civil partnership and gain legal recognition of their relationship. In consequence, the Employment Equality (Sexual Orientation) Regulations 2003 were amended to show that the status of a civil partner is comparable to the status of a spouse.
- 10.2.21 At the regional level the Regional Social Strategy (RSS) and the Regional Economic Strategy (RES) both address equality and diversity. The RSS vision is to achieve social inclusion throughout the East of England. The RSS has more specific objectives to directly tackle issues of equality and diversity, whereas the RES's approach is to treat equality and diversity as an

¹⁴⁹ Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 18 August 2009).

underlying principle informing the overall strategy for the economic and social vitality of the region. There is obviously overlap between the strategies. However, the RSS sets a wider remit and identifies specific priorities more clearly.

- 10.2.22 The East of England Plan contains several key policies on issues that affect community and wellbeing. **Policy SS1:** Achieving Sustainable Development seeks that the plan bring about sustainable development in particular through application of the elements contributing to the creation of sustainable communities such as active, inclusive and safe in terms of community identity and cohesion, social inclusion and leisure opportunities, well run in terms of effective participation, representation and leadership, well connected in terms of good transport services, well served in terms of public, private, community and voluntary services and fair for everyone. **Policy SS2:** Overall Spatial Strategy sets the context for developing policies in LDDs such as requiring that new development contributes to improving quality of life, community cohesion and social inclusion including by making suitable and timely provision for health, social services sectors and education needs.

10.3 What are the key objectives and other decision-making criteria that we need to consider?

- 10.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:

- Reduce poverty and inequality and promote social inclusion
- Promote employment, learning, skills and innovation
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

- 10.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee:¹⁵⁰ Relevant priorities include:

- Regenerating the Town
- Promoting a clean, green, healthy and safe environment
- Tackling housing need
- Developing good citizenship
- Providing value for money.

10.4 What's the situation now? (including any existing problems)

- 10.4.1 This section has been structured according to the six equality streams in line with EqIA advice¹⁵¹. These are then followed by sections on health and a final general community wellbeing section.

¹⁵⁰ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

Population, age and gender

- 10.4.2 Harlow is the most densely populated District in Essex (25.79 persons per hectare), far greater than the regional (2.82) and national (3.77) population densities¹⁵². The mid-2007 population of Harlow was estimated as 78,300, 48% male and 52% female.¹⁵³ For this reason, Harlow may be described as a medium sized town (designed for 60,000 when it was established as a New Town in 1947), but it comprises a relatively small local authority administrative area. It is also important to note that over 400,000 people live in the Harlow sub-region.¹⁵⁴ Harlow has experienced varying levels of migration. Out-migration occurred between 1981 and 1995, followed by in-migration between 1996 and 2000 with the construction of Church Langley and a 1991 – 2001 population increase. Since 2000 the town has been experiencing a period of net out-migration.¹⁵⁵ In 2001 there were 33,185 households in Harlow, comprised primarily of one-person (30%) and married couple (36%) households.¹⁵⁶
- 10.4.3 The wards of Church Langley, Sumners and Kingsmoor and Great Parndon have a closer male-female gender divide (see Table 6), and these wards also have younger age profiles with more young people under the age of 14 than other wards (see Table 7). Church Langley in particular has a noticeably large number of residents in the 30-44 age group and in the 0-4 age group, reflecting the large number of families resident in this ward. The majority of households in Church Langley have children but there is a lesser concentration of lone parent households than in other wards. Staple Tye also has a large number of young people in both the 0-4 and 10-14 age groups and has the largest rate of lone parent households in Harlow. Toddbrook and Little Parndon and Hare Street also have a large proportion of young people. Mark Hall and Old Harlow have older age profiles than the other wards, with less young people and more old people, particularly in the 75-84 age group. Pensioners account for approximately 30% of inhabited households in both Old Harlow and Mark Hall.

Table 6: Gender profile for Harlow's wards¹⁵⁷

Ward	Male – number (%)	Female – number (%)
Staple Tye	3,562 (48)	3,794 (52)
Netteswell	3,401 (48)	3,635 (52)
Toddbrook	3,436 (48)	3,776 (52)
Little Parndon and Hare Street	3,595 (48)	3,890 (52)
Mark Hall	3,333 (48)	3,646 (52)
Bush Fair	3,578 (48)	3,905 (52)

¹⁵¹ Improvement & Development Agency (no date). *Equality Impact Assessments (EqIAs)* [online] available at: <http://www.idea.gov.uk/idk/core/page.do?pageld=8017247> (accessed 17 September 2009).

¹⁵² ONS. *Population Density (UV02)* 2001 data [online] available at: <http://www.neighbourhood.statistics.gov.uk> (accessed 3 September 2009).

¹⁵³ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 18 August 2009).

¹⁵⁴ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁵⁵ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy - Evidence Base and Analysis of Needs – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁵⁶ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 18 August 2009).

¹⁵⁷ Source: Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 18 August 2009).

Ward	Male – number (%)	Female – number (%)
Harlow Common	3,599 (48)	3,835 (52)
Sumners and Kingsmoor	3,754 (50)	3,691 (50)
Great Pardon	3,334 (49)	3,443 (51)
Old Harlow	2,805 (48)	3,049 (52)
Church Langley	3,809 (50)	3,841 (50)
Total	38,206 (48)	40,505 (52)

Table 7: Age profile for Harlow's wards¹⁵⁸

Age group	Staple Tye (%)	Netteswell (%)	Toddbrook (%)	Little Parndon and Hare Street (%)	Mark Hall (%)	Bush Fair (%)	Harlow Common (%)	Sumners and Kingsmoor (%)	Great Parndon (%)	Old Harlow (%)	Church Langley (%)
0-4	8.5	6.0	6.7	6.3	5.8	6.0	5.7	6.8	5.9	4.8	11.5
5-7	5.1	3.4	4.5	4.1	4.1	4.0	4.0	3.6	3.9	1.7	4.4
8-9	3.0	2.5	2.5	2.7	3.1	3.0	2.8	2.4	2.9	2.1	2.2
10-14	7.6	6.5	6.6	7.2	7.0	8.0	7.4	7.4	6.4	6.7	4.3
15	1.3	1.2	1.2	1.3	1.5	1.0	1.3	1.7	1.2	1.4	0.6
16-17	2.7	2.7	2.4	2.8	2.8	2.0	2.5	3.5	2.6	2.6	1.5
18-19	2.4	2.6	2.3	2.3	2.6	2.0	2.2	3.3	2.1	2.5	1.2
20-24	7.0	6.2	6.5	5.8	5.6	5.0	5.2	8.2	6.1	5.2	6.7
25-29	7.4	7.0	7.0	7.4	5.4	6.0	6.1	7.6	6.4	5.6	15.0
30-44	25.0	22.4	23.0	23.5	21.3	24.0	22.9	24.6	22.8	21.2	34.5
45-59	15.8	16.1	15.5	16.7	16.3	16.0	17.4	19.9	21.2	20.7	12.2
60-64	4.6	3.7	5.5	3.6	3.7	5.0	5.4	3.7	5.0	5.2	2.1
65-74	6.8	10.9	10.1	9.9	9.7	11.0	10.3	4.8	7.9	10.1	2.9
75-84	2.4	7.3	4.9	5.5	8.8	6.0	5.3	2.0	4.5	6.8	0.9
85-89	0.4	1.1	0.9	0.8	1.4	1.0	1.0	0.5	1.0	1.6	0.0
90+	0.1	0.4	0.5	0.1	0.9	1.0	0.5	0.1	0.4	0.9	0.1

Race and Ethnicity

10.4.4 The ethnic composition in July 2006 was predominantly White (91.90%) with the largest ethnic minority group Asian in a total population composition of 8.2% ethnic minorities, up from 5.12% in 2001.¹⁵⁹

¹⁵⁸ Source: Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 18 August 2009).

¹⁵⁹ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 18 August 2009).

- 10.4.5 Old Harlow has the largest White population in Harlow and the smallest Mixed, Black or Black British and Chinese or other Ethnic minority population (see Table 8). Sumners and Kingsmoor has the smallest Asian or Asian British population in Harlow. Little Parndon and Hare Street have the smallest White population and notably the largest Asian or Asian British, Black or Black British and Chinese or other Ethnic group population in Harlow. Mark Hall has the largest Mixed population in Harlow.
- 10.4.6 Eligibility for free school meals can be used as an indication of deprivation and health inequalities within a population. In all ethnic groups except White – Mixed, Asian, Black, Chinese/other – significantly less children were eligible for free schools meals in 2008 than for England.¹⁶⁰
- 10.4.7 Data from 2003/4 suggests that 37.07% of residents in Harlow think that being attacked because of their skin colour, ethnic origin or religion is a very big or fairly big problem in their local area, which is significantly higher than the national average (22.42%).¹⁶¹

Table 8: Ethnicity profile for Harlow's wards

Age	Staple Tye (%)	Netteswell (%)	Toddbrook (%)	Little Parndon and Hare Street (%)	Mark Hall (%)	Bush Fair (%)	Harlow Common (%)	Sumners and Kingsmoor (%)	Great Parndon (%)	Old Harlow (%)	Church Langley (%)
White	94.9	95.1	95.0	92.4	95.0	95.9	95.6	95.2	94.5	96.9	93.7
- British	91.8	92.0	91.9	88.8	91.7	92.7	92.6	92.4	91.8	93.7	90.1
- Irish	1.0	1.9	1.6	15	1.6	1.6	1.7	0.9	1.3	1.6	1.0
- Other	2.1	1.2	1.5	2.1	1.6	1.5	1.3	1.8	1.5	1.7	2.6
Mixed	1.2	1.1	1.2	1.3	1.5	1.3	1.1	1.3	1.3	0.9	1.4
- White & Black Caribbean	0.5	0.4	0.3	0.5	0.4	0.5	0.5	0.6	0.4	0.2	0.6
- White & Black African	0.1	0.1	0.4	0.2	0.3	0.2	0.2	0.1	0.1	0.1	0.0
- White & Asian	0.4	0.2	0.3	0.2	0.3	0.4	0.3	0.2	0.4	0.4	0.4
- Other	0.2	0.4	0.2	0.4	0.4	0.2	0.2	0.3	0.3	0.2	0.3
Asian or Asian British	1.2	1.6	1.8	2.9	1.8	0.9	1.2	1.0	1.7	1.2	2.0
- Indian	0.5	0.5	0.6	0.9	0.4	0.4	0.3	0.5	0.9	0.5	0.9
- Pakistani	0.5	0.8	0.9	1.3	0.4	0.2	0.7	0.3	0.6	0.2	0.5
- Bangladeshi	0.0	0.3	0.2	0.3	0.9	0.1	0.1	0.1	0.1	0.1	0.4
- Other	0.2	0.1	0.1	0.3	0.1	0.2	0.1	0.2	0.1	0.4	0.3

¹⁶⁰ The Association of Public Health Observatories (2009) *Harlow Health Profile 2009* [online] available at: http://www.apho.org.uk/default.aspx?QN=P_HEALTH_PROFILES (accessed 10 September 2009).

¹⁶¹ Audit Commission (2004) *Data Profile for Harlow* [online] available at: <http://www.areaprofiles.audit-commission.gov.uk/> (accessed 10 September 2009).

Age	Staple Tye (%)	Netteswell (%)	Toddbrook (%)	Little Parndon and Hare Street (%)	Mark Hall (%)	Bush Fair (%)	Harlow Common (%)	Sumners and Kingsmoor (%)	Great Parndon (%)	Old Harlow (%)	Church Langley (%)
Black or Black British	1.3	0.9	1.0	1.5	0.7	0.7	1.0	1.0	1.0	0.5	1.3
- Caribbean	0.8	0.5	0.5	0.5	0.3	0.4	0.5	0.5	0.4	0.2	0.6
- African	0.5	0.3	0.5	0.9	0.3	0.3	0.3	0.5	0.6	0.3	0.5
- Other	0.0	0.1	0.1	0.1	0.1	0.0	0.2	0.0	0.0	0.0	0.1
Chinese or other Ethnic group	1.3	1.3	1.0	1.9	1.1	1.2	1.0	1.6	1.4	0.5	1.7
- Chinese	1.0	1.2	0.7	0.8	0.7	1.0	0.8	1.3	1.0	0.4	1.3
- Other	0.3	0.1	0.3	1.1	0.4	0.2	0.2	0.3	0.4	0.1	0.4

Social exclusion and deprivation

10.4.8 Recent years have seen a gradual rise in social exclusion and deprivation alongside urban decay in Harlow District.¹⁶² The Indices of Multiple Deprivation (IMD) 2007 measures deprivation for seven sub-domains and also calculates an overall index score. Overall, only 2% of the population of the East of England live in areas that are amongst the most deprived 10% in England, and these areas are all classified as 'urban' or 'town and fringe'. In 2007, Harlow was ranked 121/354 nationally, 9/48 regionally and 2/12 within Essex, where the lowest number is the most deprived. Harlow is not within the 20% least deprived local authorities nationally; however, when compared to the region, Harlow does contain noticeable areas of deprivation, containing pockets at a localised scale (see Figure 9). Given that the design of Harlow is such that it is split into neighbourhoods the easiest way to visualise this is by looking at deprivation between the different wards (see Table 9).

Table 9: IMD for areas of Harlow (2004-not determined for 2007)¹⁶³

Ward	IMD Score	Rank of IMD (most deprived first)
Staple Tye	29.44	8517
Netteswell	23.99	11290
Toddbrook	23.36	11784
Little Parndon and Hare Street	23.3	11818
Mark Hall	23.28	11891
Bush Fair	22.68	12075
Harlow Common	22.17	12517

¹⁶² PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009)

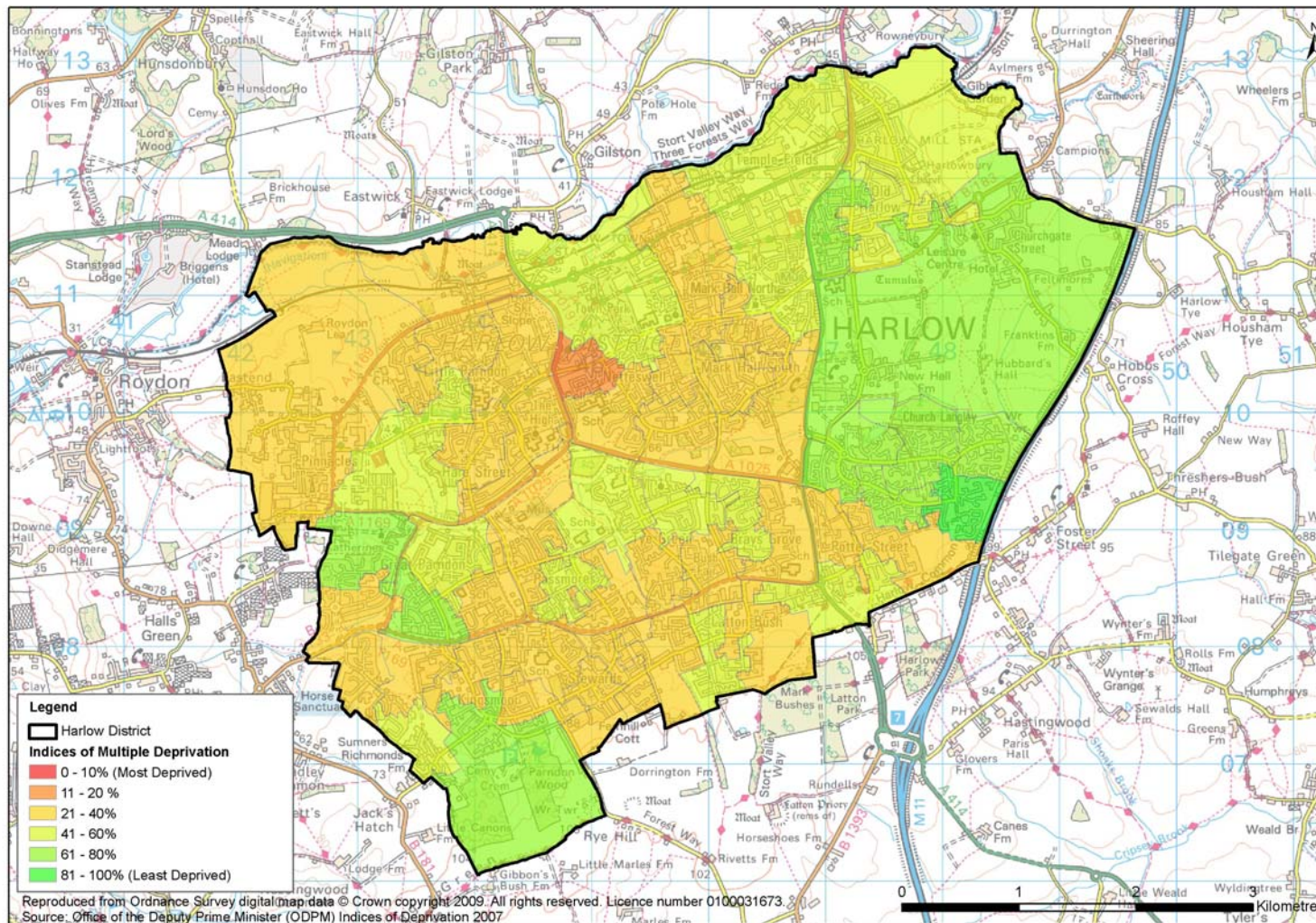
¹⁶³ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 18 August 2009).

Ward	IMD Score	Rank of IMD (most deprived first)
Summers and Kingsmoor	22.58	12772
Great Pardon	18.84	15256
Old Harlow	13.49	19837
Church Langley	10.63	23128

- 10.4.9 Table 9 illustrates that Staple Tye is significantly the most deprived ward within Harlow, whereas Church Langley is the least deprived. However, at a more localised scale, the most deprived area lies within the ward of Netteswell (see Figure 9). Generally speaking, the least deprived areas of Harlow are located on the outskirts of the town; Great Parndon and Sumners and Kingsmoor to the southwest and, least deprived of all; Old Harlow and Church Langley to the northeast/east.
- 10.4.10 Staple Tye has the largest rate of lone parent households in Harlow (15%) and the largest percentage of divorcees in Harlow (8%).¹⁶⁴ Church Langley is one of the newest communities in Harlow and the majority of households in the ward have children.

¹⁶⁴ Harlow Council (2006) *Harlow Ward Profiles – Staple Tye* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/growth_and_regeneration/regeneration_unit/key_statistics_and_data/harlow_ward_profiles.aspx (accessed 18 August 2009).

Figure 9: Indices of Multiple Deprivation (IMD) 2007 for Harlow



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Sexual orientation

- 10.4.11 In the 2001 census, Harlow had a similar percentage of same-sex couples to the region (0.15%), which was slightly below the national percentage of couples (0.20%).¹⁶⁵

Religion and belief

- 10.4.12 Key statistics for religion and belief in Harlow are outlined in Table 10 below. Harlow has a noticeably greater percentage of the population with no religion than in the East of England and nationally. This is reflected in lower percentages of the population for all the religious denominations recorded in the 2001 census, with Buddhism the one exception.

Table 10: Religion and belief (2001) in Harlow¹⁶⁶

Religion stated (% population)	Harlow (%)	East of England (%)	England (%)
Christian	67.3	72.14	71.74
Buddhist	0.32	0.22	0.28
Hindu	0.39	0.58	1.11
Jewish	0.26	0.56	0.52
Muslim	1.31	1.46	3.10
Sikh	0.09	0.25	0.67
Other religions	0.21	0.29	0.29
No religion	22.37	16.74	14.59
Religion not stated	7.74	7.75	7.69

Health and disability

- 10.4.13 Male life expectancy in the East of England is the second highest of any English region and female life expectancy is the third highest of the English regions. In 2007, average life expectancy for males and females was higher in Harlow (77.7 and 82.7 respectively) than for England (77.65 and 81.81 respectively), but regionally only greater for males (78.7 male and 82.6 female).¹⁶⁷ Although female life expectancy is significantly greater than the national average, this is not the case for male life expectancy which remains similar to the average.¹⁶⁸

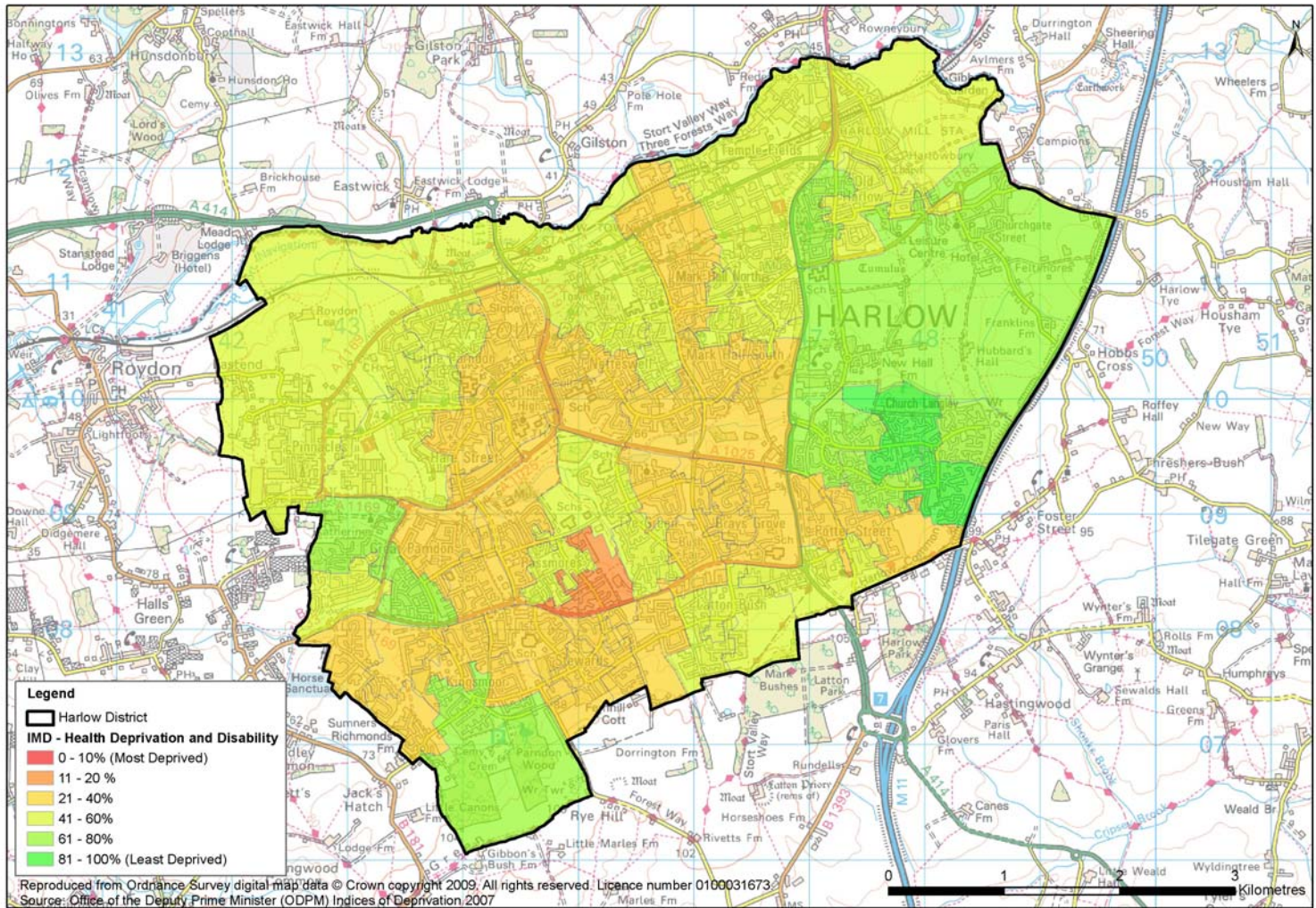
¹⁶⁵ ONS. *Same-sex couples (UV93) 2001* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 10 September 2009).

¹⁶⁶ Source: ONS. *Religion (KS07) 2001* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 10 September 2009).

¹⁶⁷ ONS. *Life Expectancy at Birth, 2005-2007* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 18 August 2009).

¹⁶⁸ The Association of Public Health Observatories (2009) *Harlow Health Profile 2009* [online] available at: http://www.apho.org.uk/default.aspx?QN=P_HEALTH_PROFILES (accessed 10 September 2009).

Figure 10: IMD 2007 for health in Harlow



- 10.4.14 Mapping the Health Deprivation and Disability Domain of the IMD for the region highlights Harlow to be a small pocket of health deprivation within the region, although Harlow (indicative of the region generally) is not within the 20% least deprived nationally. Figure 10 illustrates that Old Harlow, Church Langley, Great Parndon and Sumners and Kingsmoor, are the least deprived wards for health; with the fringes of Harlow in general the least deprived in the District for health. The ward Toddbrook contains a noteworthy pocket of health deprivation within the District.
- 10.4.15 The health of Harlow District is generally worse than the England average. The number of people diagnosed with diabetes is greater in Harlow than England, although levels of children's tooth decay are better. Similarly to the trend and average in England, deaths from all causes, early deaths from cancer and early deaths from heart disease and stroke, have improved for men and women over the last ten years. Levels of physical activity in school children are lower than the nationally average, although it meets the national target and levels of obesity in Reception children are similar to the national average. In adults, the percentage of healthy eaters (23.2%) and the percentage of the population that is obese (26.8%), is significantly worse than nationally (26.3% and 23.6% respectively).¹⁶⁹
- 10.4.16 Table 11 shows that Harlow has a larger percentage of disability living allowance claimants in its population than in the national and, especially, in the regional population. However, the District has comparatively less claimants in the 60-69 year old age bracket. Although nationally and regionally there is no gender divide in number of claimants, in Harlow a higher percentage of females than males make a disability living allowance claim.

Table 11: Disability Living Allowance Claimants (2002-2008)¹⁷⁰

	Harlow (%)	East of England (%)	England (%)
Claimants aged under 16	12	13	11
Claimants aged 16-24	6	7	6
Claimants aged 25-49	27	27	26
Claimants ages 50-59	18	18	19
Claimants aged 60-69	20	23	24
Claimants aged 70 and over	16	12	14
Male	49	50	50
Female	51	50	50
Mobility Award: Lower Rate	32	32	29
Mobility Rate: Higher Rate	54	54	57
Mobility Award: Nil Rate	14	15	14
Care Award: Lower Rate	28	26	28
Care Award: Middle Rate	36	37	34
Care Award: Higher Rate	21	24	24
Care Award: Nil Rate	15	12	14

¹⁶⁹ The Association of Public Health Observatories (2009) *Harlow Health Profile 2009* [online] available at: http://www.apho.org.uk/default.aspx?QN=P_HEALTH_PROFILES (accessed 10 September 2009).

¹⁷⁰ ONS *Disability Living Allowance Claimants, 2002-2008* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 10 September 2009).

Crime

- 10.4.17 Harlow District has significantly worse levels of violent crime (25%) than nationally (17.6%).¹⁷¹ The District also contains areas of deprivation relating to crime (see Figure 11). The ward of Mark Hall, in particular, contains an area of Harlow amongst the 10% most deprived nationally. The west and east fringes of Harlow are generally the least deprived areas for crime, including the wards of: Hare Street and Little Parndon; Great Parndon; Old Harlow, and' Church Langley.
- 10.4.18 Key figures for crime and safety are highlighted in the Annual Monitoring Report (AMR) for Harlow and outlined in Table 12. Crime reported in Harlow generally represents less than 3% of the regional total, however; harassment charges are notably high with 3.5% of the regional total, and theft from a person is notably low constituting only 0.96% of the regional total.¹⁷² Harlow has exceeded the LSP target of an 18.5% reduction in crime. In 2007/2008, the Safer Harlow Partnership funded Papworth Housing Service's Safer Homes Programme, which provided housing security and advice for 164 people. Hate crime is not considered to be a large-scale problem in Harlow, however; the District has set up initiatives to prevent and reduce anti-social behaviour, substance misuse and domestic violence.¹⁷³

Table 12: Crime statistics 2007-2008¹⁷⁴

Crime	Harlow	East of England	England
Violence Against the Person	1,949 (2.64% of regional)	73,727	896,287
Wounding or Other Act Endangering Life	17 (1.60% of regional)	1,064	13,569
Other Wounding	703 (2.16% of regional)	32,600	410,991
Harassment Including Penalty Notices for Disorder	615 (3.5% of regional)	17,384	214,702
Common Assault	499 (2.97% of regional)	16,812	191,362
Robbery	127 (2.85% of regional)	4,450	82,404
Theft from the Person	58 (0.96% of regional)	6,062	89,072
Criminal Damage Including Arson	1,452 (1.53% of regional)	94,892	965,995
Burglary in a Dwelling	327 (1.48% of regional)	22,071	269,400
Burglary other than a Dwelling	688 (2.50% of regional)	27,616	286,875
Theft of a Motor Vehicle	332 (2.32% of regional)	14,323	160,109
Theft from a Motor Vehicle	745 (1.97% of regional)	37,889	407,141

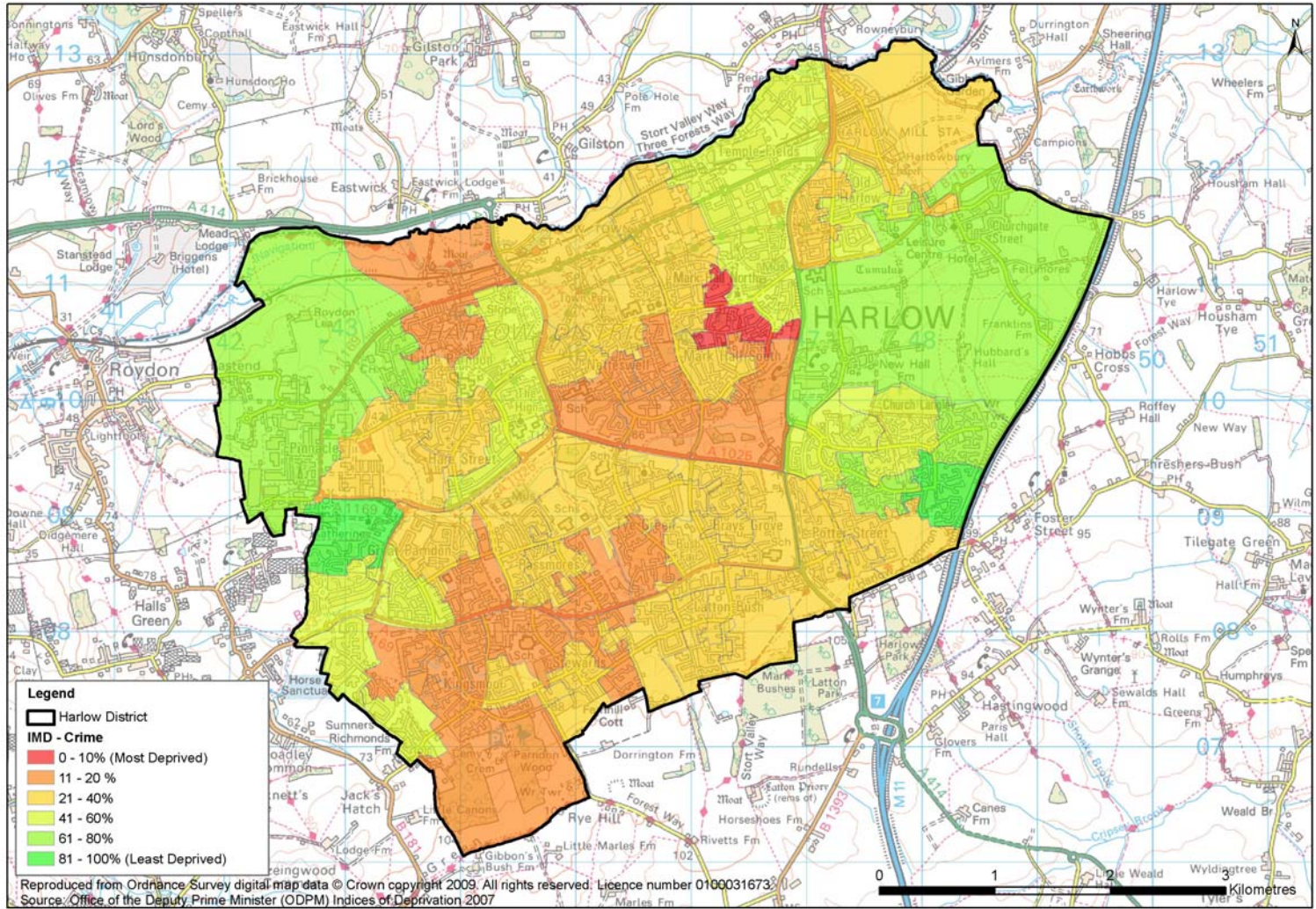
¹⁷¹ Recorded violence against the person crimes crude rate per 1,000 population 2007/08. From: The Association of Public Health Observatories (2009) *Harlow Health Profile 2009* [online] available at: http://www.apho.org.uk/default.aspx?QN=P_HEALTH_PROFILES (accessed 10 September 2009).

¹⁷² Source: ONS. *Key Figures for Crime and Safety, 2007-2008* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 18 August 2009).

¹⁷³ Harlow 2020 Partnership (2008) *Harlow 2020 Vision – Key achievements 2007-08* [online] available at: http://www.harlow2020.org.uk/downloads/key_achievements/harlow_2020_report.pdf (accessed 18 August 2009).

¹⁷⁴ Source: ONS. *Key Figures for Crime and Safety, 2007-2008* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 18 August 2009).

Figure 11: IMD 2007 for crime in Harlow



Other community and wellbeing evidence

- 10.4.19 The level of teenage pregnancy in Harlow is worse than the England average, although key work is being carried out into this issue within the District.¹⁷⁵
- 10.4.20 Harlow has recently formed a Voluntary Sector Forum and research has identified that 1,200 volunteers have been involved with 35 key voluntary sector organisations in Harlow. Harlow Arts Council has also been reformed as the Community Arts umbrella organisation for Harlow. Harlow Cultural Venues is a new community group promoting cultural venues and new arts works and displays in the Town Centre have been set up through Harlow Council, Harlow Renaissance and 'Window Works'. The Sculpture Walks Project Harlow Council and Friends of Harlow Sculpture Collection (FHSC) deliver Summer Sculpture Exhibitions and Sculpture Trails.¹⁷⁶

Are there any evidence gaps?

- 10.4.21 A draft Harlow Regeneration Strategy (2009-2021) is forthcoming.¹⁷⁷ The revised Strategy will build upon the key themes and evidence base identified in the 2007 Strategy to deliver a geographically targeted approach in addition to addressing issues of town wide significance.
- 10.4.22 The Council is also developing a Playing Pitch Strategy and a Sport and Physical Activity strategy for the town.

10.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 10.5.1 The AMR acknowledges that the localised pockets of deprivation within Harlow can lead to increases in crime, child poverty, unemployment and illness.¹⁷⁸ The trend of increasing urban decay and associated social exclusion and deprivation will likely continue. Added to this, national trends – such as an increasingly ageing population – will put additional pressure on health care and other services.
- 10.5.2 In the absence of a plan, Harlow LSP, the Community Strategy and registered charities and the voluntary sector (VCS) will play a vital role in the district's community well-being; but will not be in a position to shape development to the extent possible with a Core Strategy. Without planned development and other supporting policies (e.g. for community, leisure, employment, housing, green and physical infrastructure etc), the disparity between disadvantaged and more prosperous area within the District will likely continue. The vision and plans set out within the Regeneration Strategy will also be harder to attain and implement.

10.6 What issues should be a particular focus for the appraisal?

- 10.6.1 In light of the information above, key issues to take into account in the appraisal in relation to community and wellbeing include:

¹⁷⁵ The Association of Public Health Observatories (2009) *Harlow Health Profile 2009* [online] available at: http://www.apho.org.uk/default.aspx?QN=P_HEALTH_PROFILES (accessed 10 September 2009).

¹⁷⁶ Harlow 2020 Partnership (2008) *Harlow 2020 Vision – Key achievements 2007-08* [online] available at: http://www.harlow2020.org.uk/downloads/key_achievements/harlow_2020_report.pdf (accessed 18 August 2009).

¹⁷⁷ Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

¹⁷⁸ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 18 August 2009).

- The need to take into account pockets of deprivation within Harlow (particularly in the centre compared to the fringes of Harlow) and differences in deprivation, equality and health between different Harlow wards, particularly in light of differing population structures (age, family, ethnicity etc)
- The need to ensure that the equality, health and social care needs of a growing and ageing population are met
- The need to ensure that the needs of the disabled population in the district are met
- The need to consider why female, but not male, life expectancy exceeds the regional average
- The need to address health issues of obesity, diabetes and poor levels of healthy eating
- The need to tackle issues of crime, particularly harassment charges and violent crime
- The need to tackle low levels of physical activity in children and high levels of teenage pregnancy
- To consider design measures that will increase community well-being, such as green infrastructure, landscaping and SuDS.

11 Economy and employment

11.1 Introduction

- 11.1.1 Local economies are open to global, national and regional influences and changes in the wider economy. This presents numerous threats and opportunities. Recognition of local strengths and weaknesses, and through public and private sector partnership, are important in ensuring local preparedness to adapt to change, address threats and respond to opportunities¹⁷⁹. A healthy and prosperous economy is key a healthy society (e.g. town vibrancy, good environments to live and work) and with careful planning it should also enhance environmental well-being.
- 11.1.2 Local economies are characterised by a range of interlinked factors, including housing and transport which within this report are discussed in Chapters 13 and 16. This section focuses on employment, skills and education as key factors that influence the local economy of Harlow.

11.2 What's the policy context?

- 11.2.1 PPS1: Delivering Sustainable Development (2005)¹⁸⁰ stresses the importance of a strong, stable and productive economy and requires planning authorities to ensure that the necessary infrastructure is provided to support new and existing economic development and housing. Accessibility to jobs and services are also addressed as a means of achieving social cohesion and inclusion. The document sets out how authorities can contribute to delivering sustainable economic development including recognising that economic development can deliver environmental and social benefits; recognising the wider benefits of economic development alongside any adverse local impacts; ensuring suitable locations are available for economic sectors; providing infrastructure and services to support new and existing economic development and housing; taking account of the relevant economic strategies in DPDs; and, identifying opportunities for future investment to deliver economic objectives. PPG4: Industrial, commercial development and small firms (1992)¹⁸¹ aims to encourage continued economic development that is compatible with the Government's environmental objectives.
- 11.2.2 Draft PPS4: Planning for Prosperous Economies¹⁸² consultation closed at the end of July 2009 with the government expecting to publish the final PPS and associated guidance before the end of 2009. The draft PPS4 seeks to combine all national planning policy on economic development in urban and rural areas and town centres into one consolidated and streamlined PPS. The new PPS4 seeks to provide planning certainty for businesses and investors by creating a 'positive planning' environment which recognises the importance of different drivers of economic development, from town centres through to rural enterprise. It also retains the sequential test of town centres first. In its final form this PPS will replace a number of existing

¹⁷⁹ Kent CC (2007) *Kent Prospects 2007 - 2012* [online] available at: <http://www.kent.gov.uk/publications/community-and-living/kent-prospects-2007-to-2012.htm> (accessed 21 July 2009).

¹⁸⁰ ODPM (2005) *Planning Policy Statement 1: Delivering Sustainable Development* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1> (accessed 29 June 2009).

¹⁸¹ ODPM (1992) *Planning Policy Guidance 4: Industrial, Commercial Development and Small Firms* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/ppg4> (accessed 29 June 2009).

¹⁸² Communities and Local Government (2009) *Planning Policy Statement – Consultation Paper on a new Planning Policy Statement 4: Planning for Prosperous Economies* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/consultationeconomicpps> (accessed 25 August 2009)

guidance documents including PPG4: Industrial, Commercial Development and Small Firms, PPG5: Simplified Planning Zones and PPS6: Planning for Town Centres.

- 11.2.3 Harlow is part of the London-Stansted-Cambridge-Peterborough Growth Area, one of the four designated growth areas in the Government's Sustainable Communities Plan.¹⁸³ To address the housing pressures in London and the South East, the Government established housing targets for these Growth Areas to be achieved by 2021. However, achieving sustainable growth requires job creation which in turn demands the provision of sufficient employment infrastructure such as land, facilities and transport links.
- 11.2.4 The Regional Economic Strategy for the East of England 2008-2031 sets out an overall vision for the region in 2031, which is based on achieving high levels of international competitiveness, developing a global reputation for innovation and business growth, and attracting and retaining the best talent. The RES identifies the main economic challenges for the East of England as raising rates of productivity growth, increasing entrepreneurship and the need to better manage the impacts of economic success in terms of economic participation and environmental quality. Key to this strategy is the identification of larger urban areas, regional cities and their surrounding rural areas as the drivers of physical growth and economic success. The RES sets headline targets in a number of areas including:
- growth in GVA per employee over 2008-2031 of 2.1% p.a., and in GVA per capita of 2.3% p.a.;
 - employment rate of 80% for the working population and of 70% for the 16-74 population by 2031;
 - NVQ Level 2 or above held by 90% of working-age population by 2020, NVQ 3 or above held by 68%, and NVQ Level 4 or above held by 40%; and
 - Raising the ratio of lower-quartile to average incomes to 60% by 2031.
- 11.2.5 Within the Stansted/Harlow sub-region the RES aims to establish the area as an important regional centre for growth by maximising the opportunities provided by its proximity to London, Stansted Airport and Cambridge. To realise the opportunities major new transport investments are needed to improve access to employment sites, the M11 and Stansted Airport and regional east to west links.
- 11.2.6 **Policy SS3** of the East of England Plan¹⁸⁴ identified Harlow as a **Key Centre for Development and Change** (KCDC). KCDCs are intended to reflect the "*polycentric nature of the East of England*" and its arrangement of small and medium sized towns and cities surrounded by more rural areas which look to those towns for employment and higher level services. Harlow is therefore recognised as a main driver of economic growth in the region. **Policy E1:** Job Growth sets an indicative target for net growth in jobs in 2001-2021 of 56,000 for the Rest of Essex (no specific target is apportioned to Harlow). **Policy E3:** Strategic Employment Sites identifies Harlow as a regionally strategic location to provide sites in order to assist regeneration and ensure growth in key sectors and clusters. **Policy E7:** The Region's Airports states that employment development not directly related to the Airport's operation should be located at Harlow and other nearby towns. **Policy SS5:** Priority Areas for Regeneration of the Plan identifies Harlow as a town with significant areas of deprivation, stating that LDDs and

¹⁸³ See: <http://www.communities.gov.uk/housing/housingsupply/growthareas/growthareasby/londonstanstedcambridge/>

¹⁸⁴ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/ (accessed 18 August 2009).

relevant non-statutory plans should set out policies to tackle the problems of economic, social and environmental deprivation.

11.2.7 Since designation as a New Town in 1947, Harlow – now a former new town – has experienced a gradual urban decay accompanied by a decline in economic fortunes and a rise in social exclusion and deprivation.¹⁸⁵ For this reason, regeneration has been a priority of Harlow Council. The Harlow Regeneration Strategy¹⁸⁶ was developed to ensure that renewal continues to move ahead in Harlow before full implementation the East of England Plan and to allow the District to take full advantage of the Plan. The Strategy sets out three overlapping phases of work within a ‘timeline for change’ for the period until 2021:

1. Establishing regeneration building blocks
2. Investing in potential
3. Delivering the benefits of growth.

11.2.8 The town is identified in Regional Planning Guidance as a Priority Area for Economic Regeneration. A draft Harlow Regeneration Strategy (2009-2021)¹⁸⁷ is being developed to deliver the physical, social and environmental regeneration of Harlow. The revised Strategy will build upon the key themes and evidence base identified in the 2007 Strategy to deliver a localised targeted approach in addition to addressing issues of town wide significance. It is considered important that regeneration is in keeping with the town's original design, neighbourhoods, green spaces and community spirit.

11.2.9 Harlow's LSP has developed the District's Community Strategy which must be taken into account when preparing the LDF. The Strategy is known as the Harlow 2020 Vision¹⁸⁸, which aims for Harlow to be:

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

11.2.10 To deliver the Vision a number of priorities have been set out to address key issues relevant to the Town. Those relevant to the economy are:

- Economic Prosperity
- Education, Learning and Skills.

¹⁸⁵ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁸⁶ Harlow Council (2007) *Regeneration Strategy and Implementation Plan 2007-2009* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁸⁷ Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

¹⁸⁸ Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 18 August 2009).

11.3 What are the key objectives and other decision-making criteria that we need to consider?

11.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Reduce poverty and inequality and promote social inclusion
- Promote employment, learning, skills and innovation.

11.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee.¹⁸⁹ Relevant priorities include:

- Regenerating the Town
- Improving Harlow for business.

11.4 What's the situation now? (including any existing problems)

11.4.1 It should be noted that most of the documents referred to in building up the existing picture for Harlow do not take into account the latest economic recession.

11.4.2 Harlow has experienced gradual urban decay and as a consequence has suffered a decline in economic fortunes and a rise in social exclusion and deprivation. These factors combine to challenge the economic prosperity and level of qualified employees within the district.¹⁹⁰ However, Harlow is geographically very well located to take advantage of economic opportunities. The District has access to the M11 motorway network, rail and Stansted airport (12 miles away); and is situated in close proximity to London and within commuting distance of the Cambridge hi-tech sub-region. It is also located within the London-Stansted-Cambridge-Peterborough growth corridor. For these reasons it has attracted some inward investment.

11.4.3 Harlow's economy was primarily based around manufacturing, but the District has "*some major sectoral strengths and 'flagship' employers*" (including GlaxoSmithKline, Arrow Electronics, Nortel Networks and C-Mac) and the economy has diversified with industrial specialisms as part of a growing knowledge economy to include:¹⁹¹

- Research & development
- Pharmaceuticals
- Manufacture of electronic equipment.

¹⁸⁹ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

¹⁹⁰ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.aspx (accessed 18 August 2009).

¹⁹¹ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.aspx (accessed 18 August 2009).

- 11.4.4 Other growth sectors include retail, construction, professional business services and hotels and restaurants. Utilities, chemical manufacturing and manufacturing have been in decline. The number of VAT Registered Businesses (businesses with sales of over £56K, excluding many in self-employment) per 1,000 economically active for Harlow (38.4) is considerably lower than for the Harlow Sub-Region (78.6), the Eastern Region (65.3) and England and Wales (62.7). The District's economy has in the past been vulnerable owing to a small number of very large employers and thus a narrow business base.¹⁹²
- 11.4.5 The most recent key figures for economic deprivation (2007) are outlined in Table 13, and demonstrate that Harlow fares comparatively well to England, but not as well to the East of England despite a slightly higher employment rate. Harlow, however, has a higher proportion of job seekers and persons claiming a key benefit.¹⁹³ In addition, a higher employment rate in Harlow may be due to there being substantially fewer Harlow residents in full time education.¹⁹⁴

Table 13: Key figures (%) for economic deprivation (2007)¹⁹⁵

	Harlow	East of England	England
Economy Activity Rate	87.9%	81%	78.6%
Employment Rate	80.7%	77.4%	74.4%
Unemployment Rate	4.9%	4.5%	5.4%
All people of working age claiming a key benefit	15%	11%	14%
Job seekers	3%	2%	2%
Incapacity Benefits	6	5	7

- 11.4.6 Harlow is a medium sized town and a comparatively small local authority with 80,000 residents and 44,000 employees, and as such the surrounding catchment area is very important to the District's economy. Harlow's catchment area may be defined as the 'Harlow Sub Region' – Broxbourne, East Hertfordshire, Epping Forest and Uttlesford authorities – and this area includes over 400,000 people and 195,000 jobs. The Harlow Travel to Work Area (TTWA) covers Harlow, Uttlesford, most of East Herts and part of Epping Forest. It adjoins the London TTWA, which has a "strong pull effect". Periods of outmigration, as Harlow has experienced between 1981-2002 (losing 10,900 net residents), usually result in the loss of "younger and more successful residents". Moreover, during the same time period the Harlow Sub Region gained almost 15,000 people (40% via net in-migration). The Regeneration Strategy evidence base study states that:¹⁹⁶

¹⁹² PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy - Evidence Base and Analysis of Needs – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.aspx (accessed 18 August 2009).

¹⁹³ ONS. *Key Figures for Economic Deprivation, 2006-2007* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 18 August 2009).

¹⁹⁴ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy - Evidence Base and Analysis of Needs – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.aspx (accessed 18 August 2009).

¹⁹⁵ Source: ONS. *Key Figures for Economic Deprivation, 2006-2007* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 18 August 2009).

¹⁹⁶ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy - Evidence Base and Analysis of Needs – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.aspx (accessed 18 August 2009).

“In Harlow young people who have left to attend university rarely return to live and work in the town; while at least some successful households have almost certainly sought improved residential accommodation in the surrounding area.”

- 11.4.7 Employment levels have fluctuated over the years. Levels fell to 41,000 in 1981 and remained largely unchanged until the mid 1990's, after which there has been a period of steady growth to 44,400 in 2002 (12% growth 1991-2002). The stability of growth since is questionable, and there have been a significant number of business closures in the 2000's. In contrast, the Harlow Sub Region has experienced steady and substantial growth (22% growth 1991-2002), partly attributed to growth at Stansted airport. Between 1981 and 2005 this was reflected in Harlow's share of the population falling from 18%-16% and employment from 22.5%-18.5%, suggesting increased levels of out-commuting. In addition to this, Harlow is attracting an increasing number of commuters; of the 44,000 jobs in Harlow, 52% are filled by Harlow residents and 48% by non-residents (risen from 37% in 1991). In-commuting to Harlow exceeds out-commuting by just 500, representing 1.2% of Harlow's employment compared to just over 12% in benchmark Southern New Towns. Moreover, in-commuters tend to occupy the high income jobs within Harlow.¹⁹⁷
- 11.4.8 The percentage of Harlow's residents of working age that were economically active in 2001 was greater in Harlow (71.7%) than in the Harlow Sub-Region (71.4%), Eastern England (69.3%) and England and Wales (66.5%). However, Harlow notably has a lower percentage of full-time students and, compared to the Sub-Region, a higher percentage of the population long-term sick (see Table 14 below).¹⁹⁸

Table 14: Labour market participation, education and long term sick (16-74 year olds) 2001

	% Economically Active	% Full Time Student	% Long Term Sick
Harlow	71.7	4.3	5.9
Harlow Sub Region	71.4	5.2	4.0
Hertfordshire and Essex	70.2	5.5	5.1
Eastern England	69.3	5.8	5.6
England and Wales	66.5	7.0	8.3
Southern New Towns	71.2	5.9	6.0

- 11.4.9 The IMD ranks Harlow District amongst all local authorities as 193/354 for income scale and for Employment as 222/354 in 2007.¹⁹⁹ The IMD for employment and income are mapped for Harlow in Figures 12 and 13. This reflects the overall picture of low district-wide employment deprivation, but areas of worse deprivation for income. The least deprived areas tend to be on

¹⁹⁷ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy - Evidence Base and Analysis of Needs – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁹⁸ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy - Evidence Base and Analysis of Needs – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 18 August 2009).

¹⁹⁹ ONS. *Key Figures for Indices of Deprivation and Classification* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 18 August 2009).

the outskirts of the District, particularly in the east and southwest fringes. Noticeable areas of deprivation for income occur in the wards of Mark Hall, Netteswell, Toddbrook and Staple Tye.

Figure 12: IMD for employment Harlow

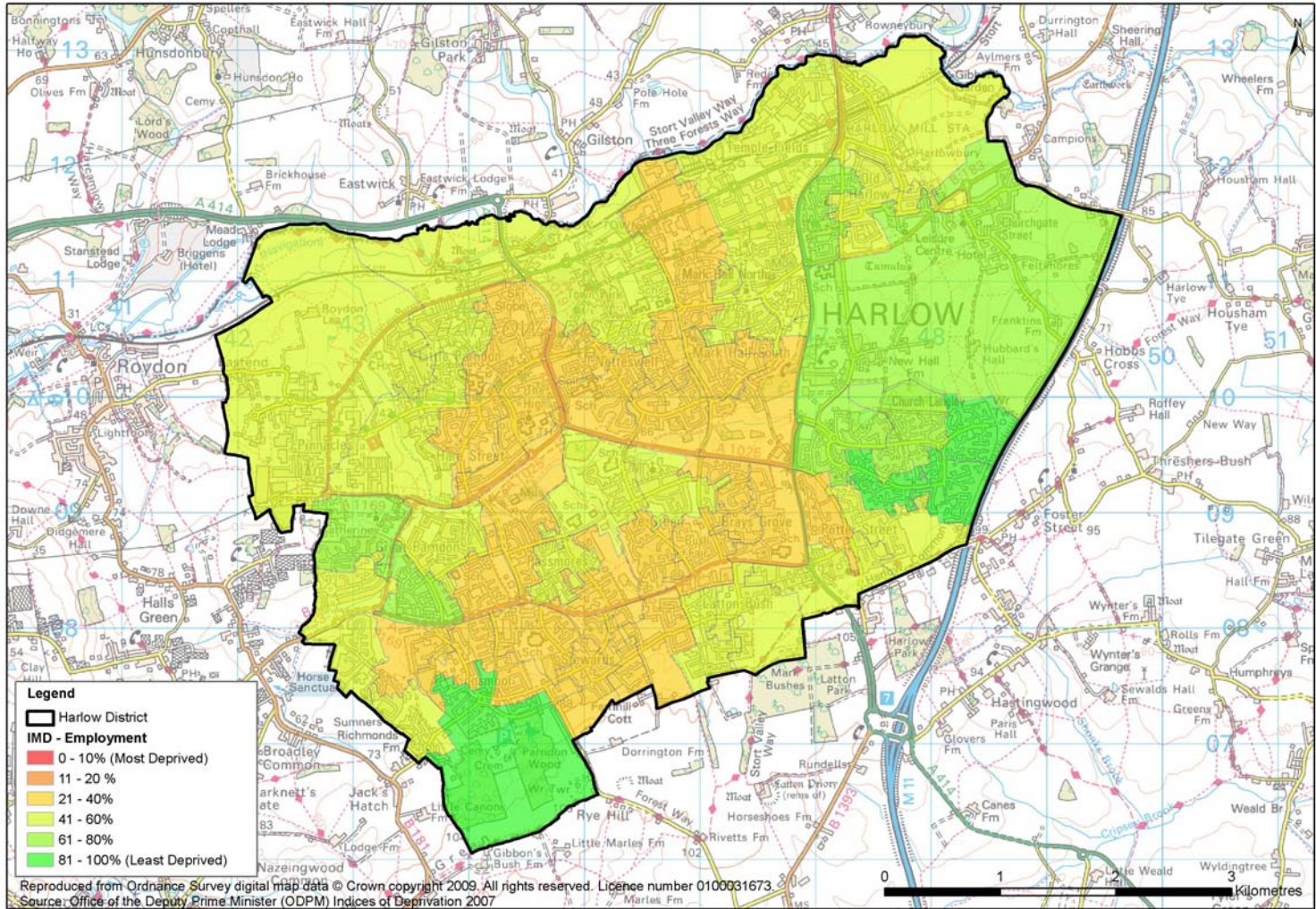
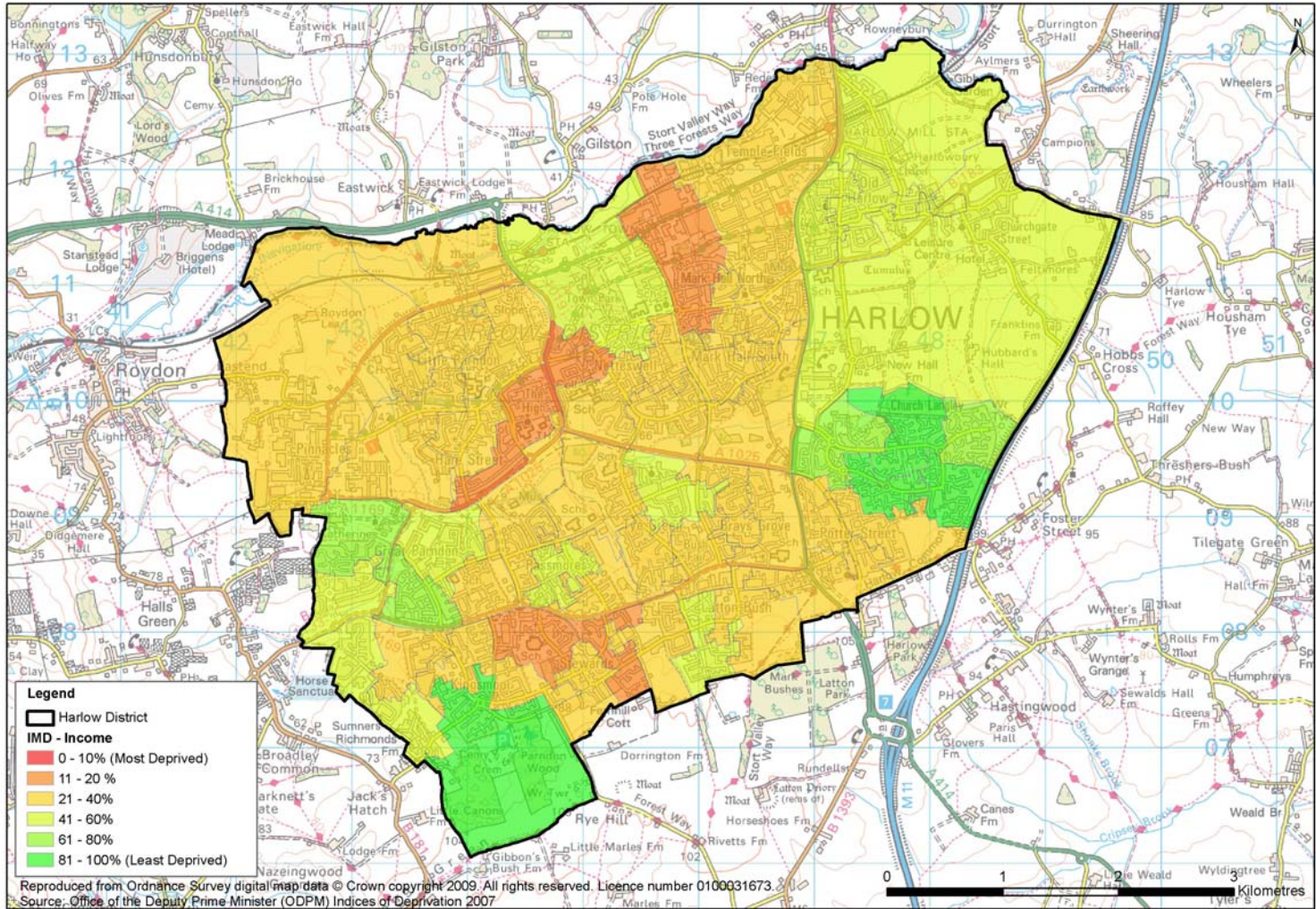


Figure 13: IMD for income in Harlow

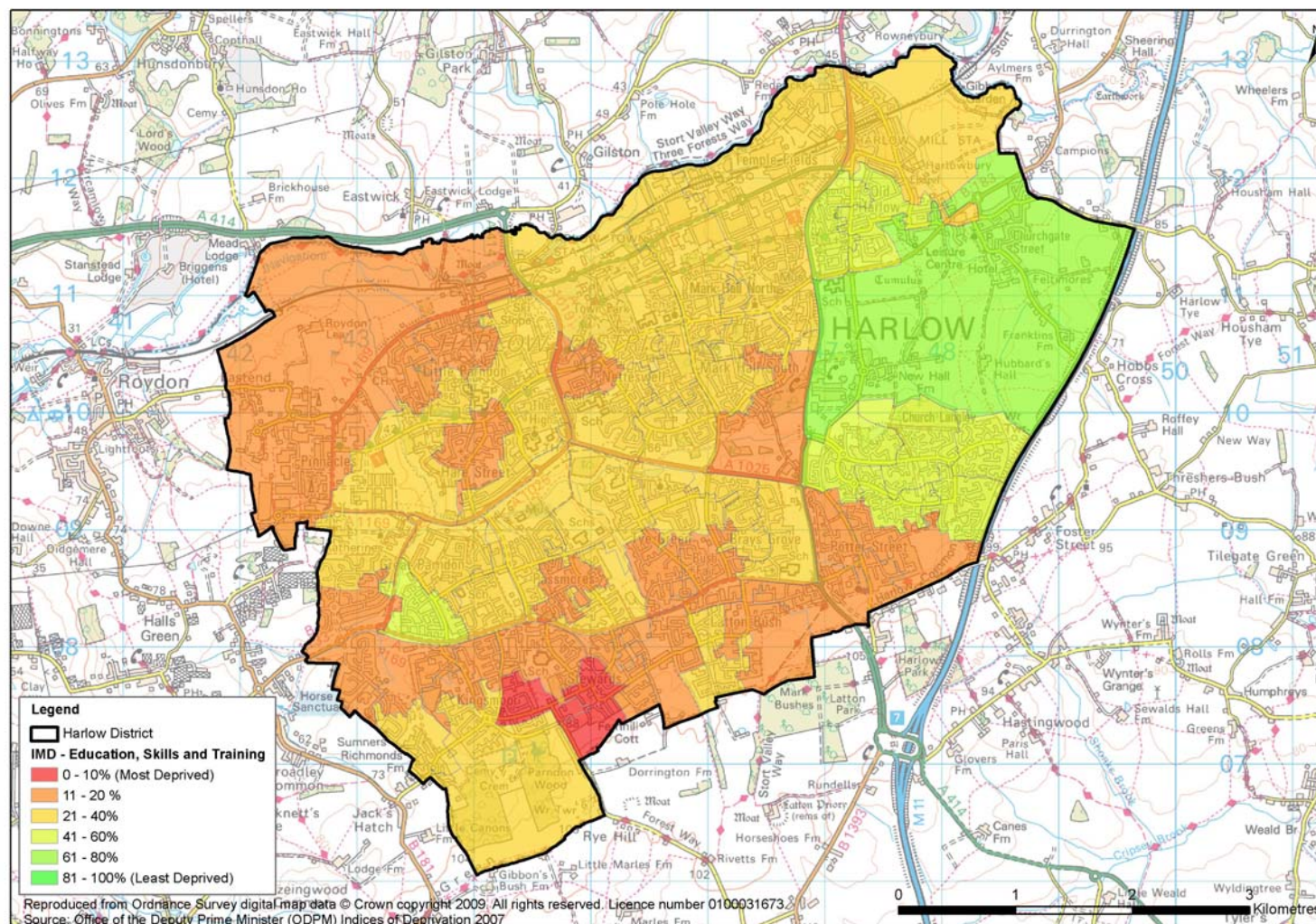


- 11.4.10 Evidence of education, skills and training deprivation exists in Harlow, with areas within the 20% least deprived nationally (see Figure 14). The number of pupils achieving five or more GCSEs graded A* to C in Harlow (60.2%) favours poorly when compared to the region (64.7%) and England (65.6%). In addition, the average Level 3 Qualifications Curriculum Authority (QCA) point score per student aged 16-18 in Harlow (661.8) falls notably below the average for the region (739.8) and nationally (721.3).²⁰⁰ Notable recent improvements include: Harlow's Children Centre network opened in 2008 and provides access to childcare, parent support and early special needs assessment; Anglia Ruskin secured £10m investment in new high education facilities; funding secured for Science Alive for a new facility with the Sports and Leisure facility; county-recognised model established for multi-agency partnership work to support children and young people with complex needs; Harlow Extended Schools programme around community schools; new learning opportunities in society, health and development and IT in the Harlow 14-19 Area Planning Group, and; further development of Harlow Skills for Life community strategy.²⁰¹

²⁰⁰ ONS. *Key Figures for Education, Skills and Training, 2007-2008* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 18 August 2009).

²⁰¹ Harlow 2020 Partnership (2008) *Harlow 2020 Vision – Key achievements 2007-08* [online] available at: http://www.harlow2020.org.uk/downloads/key_achievements/harlow_2020_report.pdf (accessed 18 August 2009).

Figure 14: IMD for education, skills and training deprivation in Harlow



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- 11.4.11 Staple Tye is the most deprived ward in Harlow (see Table 9 in chapter 10 Community). The ward has one of the worst records for its inhabitants having no qualifications or unknown qualifications for national key stage levels 1-4. The unemployment rate (91% in employment) for this ward has consistently been higher than the average unemployment rate in Harlow as a whole; and of those employed in the area, one third have no qualifications or unknown levels of qualification and only 10% have higher level qualifications. The largest occupation type for the ward's residents is in elementary occupations (17%) and this figure is notably higher than for Harlow (14.2%) and Great Britain (11.8%).²⁰²
- 11.4.12 Church Langley is one of the newest communities in Harlow and the least deprived ward in Harlow (see Table 9 in chapter 10 Community). The ward consistently falls within the top bracket for qualifications within the Harlow area and the unemployment rate in the Church Langley area has consistently been the lowest in the whole of Harlow (97% in employment). Church Langley has the largest number (51.3%) of managers and senior officials, professionals, and associate professional and technical employees in the whole of Harlow (33.8%) and favours well when compared to Great Britain (40%).²⁰³

Are there any evidence gaps?

- 11.4.13 The Employment Land Review will need to be finalised before its findings can be utilised in the LDF process.

11.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 11.5.1 Harlow faces several key challenges with regards to its economy. The District has not developed as a 'strong' sub-regional centre: stability of growth is questionable in Harlow, employment levels fluctuate, and in-commuting to Harlow exceeds out-commuting. The locally small labour market has failed to keep up with local labour requirements and the local population is in decline in contrast to the wider area. Harlow is in effect losing out to the Harlow Sub-Region where conditions have been much more favourable and where the opportunities exist for Harlow in terms of a wide catchment area that have not been capitalised upon. This situation would be harder to overturn without a Core Strategy. Plans to regenerate Harlow will also suffer as a result of no Core Strategy and, although the economy is showing signs of diversifying, this may stall in absence of a plan and the District may not continue to attract foreign investment in an increasingly competitive international market.
- 11.5.2 The Employment Land Review identifies employment locations and provides employment advice to feed into the Core Strategy. Without a plan it is unlikely that the findings of this study will be taken up and instead action would occur through the RSS and not in conjunction with localised thinking and planning for example training and transport. It is also noted that all the employment locations identified in this Review will require some form of action to maintain their position and a lack of plan will make this harder to achieve.

²⁰² Harlow Council (2006) *Harlow Ward Profiles – Staple Tye* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/growth_and_regeneration/regeneration_unit/key_statistics_and_data/harlow_ward_profiles.aspx (accessed 18 August 2009).

²⁰³ Harlow Council (2006) *Harlow Ward Profiles – Church Langley* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/growth_and_regeneration/regeneration_unit/key_statistics_and_data/harlow_ward_profiles.aspx (accessed 18 August 2009).

- 11.5.3 Although Harlow has generally an economically active labour force, it suffers in terms of the number of residents in full time education and local residents tend to lose out with higher income jobs going to in-commuters. Local authority efforts to provide higher levels of local employment and job creation and skills development will be hampered without the assistance provided by a local plan.
- 11.5.4 According to the Harlow Regeneration Strategy scoping work: *“it is probably unrealistic to believe that Harlow can, in the short to medium term, once again become a highly self-contained labour market. But building a more sustainable economy and labour market could be achieved in the long term”*. Without a Core Strategy in place, it will be even more difficult to achieve this long term goal.²⁰⁴

11.6 What issues should be a particular focus for the appraisal?

- 11.6.1 In light of the information above, key issues to take into account in the appraisal in relation to economy and employment include:
- The need to support initiatives that capitalise on the wider Harlow Sub-Region catchment area
 - The need to support job creation within Harlow of an appropriate scale and type
 - To encourage a diversified economy and to increase foreign investment within the District
 - To address the low levels of skills, training and qualifications within the District
 - The need to ensure that job creation is matched by the provision of appropriate facilities and infrastructure.

²⁰⁴ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy - Evidence Base and Analysis of Needs – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.aspx (accessed 18 August 2009).

12 Historic environment

12.1 Introduction

- 12.1.1 Conservation of the historic environment involves more than just protection of individual features. Rather, England has a rich historic interest engrained in landscapes and townscapes at a range of scales. This is not something that lends itself easily to objective, evidence based identification of sustainability issues, but is something that cannot be ignored.
- 12.1.2 Spatial planning mechanisms can directly influence the historic environment and also, as a result, have knock on effects on sustainability issues relating to community and wellbeing (see chapter 10) and landscape (see chapter 15) in particular. The historic environment is important to help sustain a sense of local distinctiveness and place and can also make a significant contribution to the local economy.

12.2 What's the policy context?

- 12.2.1 PPS1: on Delivering Sustainable Development²⁰⁵ highlights the need to protect and enhance the historic environment. PPG15: Planning and the historic environment (1994)²⁰⁶ states that planning policies can not only reduce threats to the historic environment but also increase its contribution to local amenity. Heritage can also act as a catalyst for regeneration²⁰⁷. PPG16 highlights the need to reconcile development pressures with the interests of archaeology and historic conservation. It further emphasises the principle of early assessment to ensure that remains are not needlessly destroyed, that development proposals take into account archaeological interest and that important remains are preserved in situ.
- 12.2.2 Draft PPS15: Planning for the Historic Environment consultation closes at the end of October 2009 and will replace PPG15 and PPG16: Archaeology and Planning. It is intended to reflect a more modern, integrated approach which defines the historic environment in terms of heritage assets to be conserved in accordance with a set of principles and in proportion to their significance - it also separates policy from guidance.
- 12.2.3 The issue of the historic environment is a cross-cutting theme within the East of England Plan²⁰⁸ and several policies and their supportive text make reference to its protection and utilisation for purposes such as cultural promotion and tourism. **Policy ENV6:** The Historic Environment provides direct guidance for LPAs and instructs them to identify, protect, conserve, and, where appropriate, enhance the region's historic environment. Clearly it is not the role of the LDF to provide all these functions however, spatial planning will play a key part in the preservation of Harlow's historic environment primarily through the protection of certain key areas through sound, evidence-based studies. The policy also provides a holistic definition of the region's historic environment as its *"archaeology, historic buildings, places and landscapes, including historic parks and gardens and those features and sites (and their*

²⁰⁵ ODPM (2005) *Planning Policy Statement 1: Delivering Sustainable Development* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1> (accessed 21 July 2009).

²⁰⁶ CLG (1994) *Planning Policy Guidance 15: Planning and the Historic Environment* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/pplanningpolicyguidance/historicenvironment/ppg15/> (accessed 23 June 2009).

²⁰⁷ DCMS (2001) *The historic environment: a force for our future* [online] available at: http://www.culture.gov.uk/reference_library/publications/4667.aspx/ (accessed 21 July 2009).

²⁰⁸ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/ (accessed 18 August 2009).

*settings) especially significant in the East of England.” In addition, **Policy ENV7:** Quality in the Built Environment provides criteria that new development should achieve in order to be of high quality and complement the distinctive character and best qualities of the location area it is located and to promote urban renaissance and regeneration.*

- 12.2.4 Harlow – now a former new town – was designated as a New Town in 1947. The now outdated Local Plan set out the intention to plan for Harlow whilst carrying on the aims and objectives forward into the 21st Century as set out in the original Master Plan by Sir Frederick Gibberd. The Draft Regeneration Strategy for Harlow²⁰⁹ aims to “*grasp the opportunity that growth offers to regenerate the town whilst retaining the best of its original design, neighbourhoods, green spaces and community spirit*”.

12.3 What are the key objectives and other decision-making criteria that we need to consider?

- 12.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow’s town centre. Particularly relevant objectives include:

- Conserve, restore and enhance the region’s natural and built environment

- 12.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council’s Sustainability Strategy and approved in January 2009 by the Environment and Community Committee.²¹⁰ The priorities are not particularly relevant to the historic environment however, as part of this topic, it will be important to consider:

- Regenerating the Town

12.4 What’s the situation now? (including any existing problems)

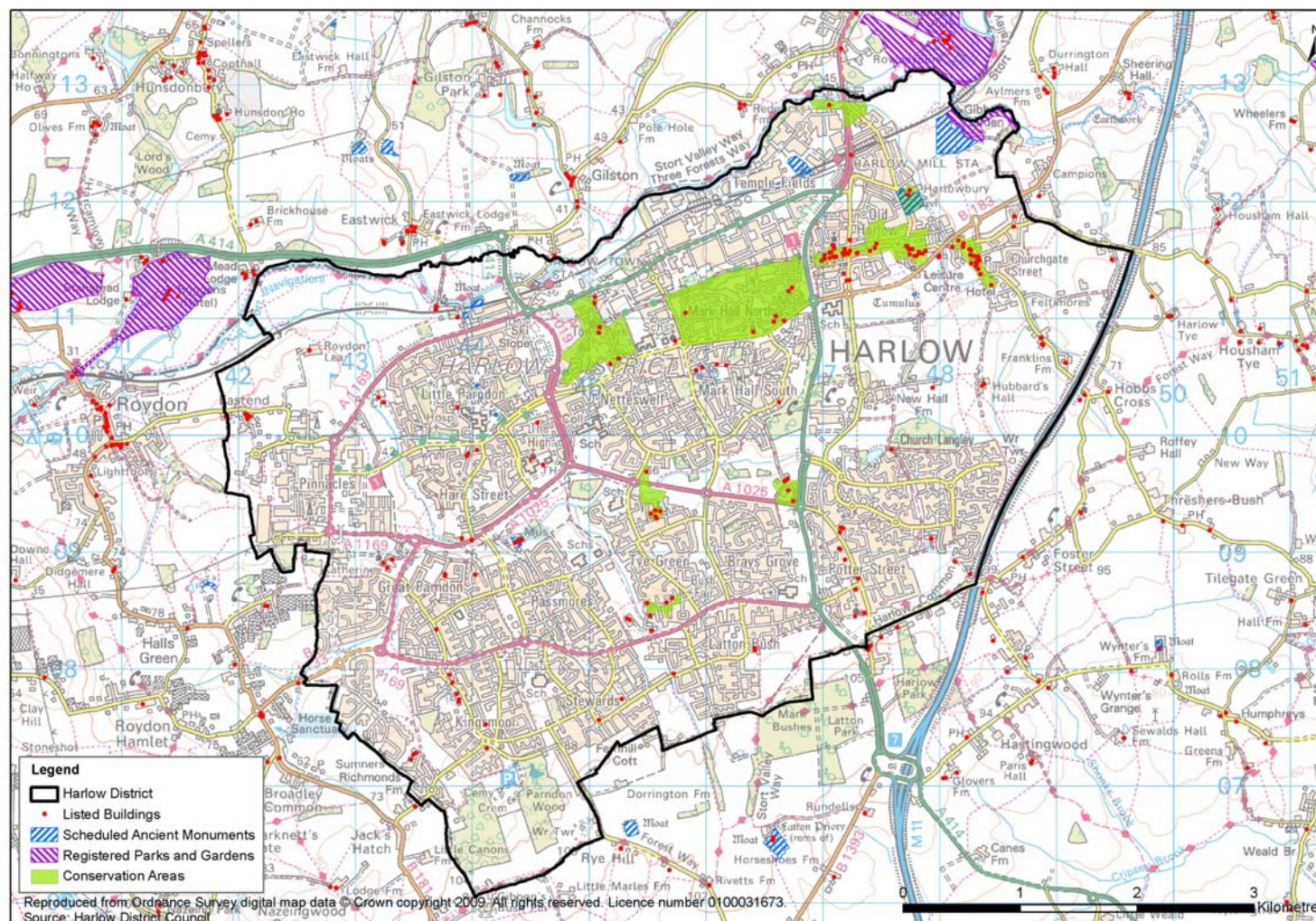
- 12.4.1 Harlow District is largely urban and its historical value is largely reflected in its designation as a New Town in 1947. The layout and architecture of the town is strongly linked to the concepts set out in Sir Frederick Gibberd’s Master Plan.

- 12.4.2 There are a number of historic environment constraints in Harlow and the surrounding area, as shown in Figure 15.

²⁰⁹ Harlow Council (undated) *Harlow (Draft) Regeneration Strategy 2009-2021* [not available online].

²¹⁰ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

Figure 15: Historic environment constraints in Harlow District and surrounding area



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- 12.4.3 Figure 15 illustrates that Harlow has a large number of listed buildings scattered throughout the town and wider area. There are currently 173 listed buildings within Harlow that are of special architectural or historic interest, particularly given Harlow's status as a former New Town. Five of the buildings are classified as Grade I, eight are Grade II* and 160 Grade II.²¹¹
- 12.4.4 A number of Conservation Areas are situated in the centre, north and east of the town. Conservation Areas within Harlow include:²¹²
- Old Harlow
 - Churchgate Street
 - Netteswellbury
 - Mark Hall North
 - Town Park/Netteswell Cross
 - Harlowbury
 - Puffers Green
 - Harlow Mill & Old Road North
 - Tye Green.
- 12.4.5 The map illustrates three large areas within the northeast of the town around Harlow Mill Station Harlow District where Scheduled Ancient Monuments are located. Located outside of the District are three more distinct areas of SAMs to the north and a further two areas to the south. In addition to a number of undesignated sites of existing or potential archaeological importance, Harlow Council recognises a total of 11 SAMs in the District.²¹³
- Chapel at Harlowbury
 - Harlow Roman Temple
 - Netteswellbury Barn, Netteswell
 - Little Parndon moated site
 - Site of Parndon Hall
 - Harlowbury deserted medieval village
 - Bowl barrow; 230m north of Harlow Hospital, 140m north of Harlow Hospital; 110m north-east of Harlow Hospital
 - Cursus, south of Gilden Way
 - Roman villa, 500m north-east of Harlowbury
 - Bowl barrow, 240m north of The Kennels

²¹¹ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 19 August 2009).

²¹² Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 19 August 2009).

²¹³ Harlow Council (2006) *Adopted Replacement Harlow Local Plan* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/harlow_replacement_local_plan.aspx (accessed 19 August 2009).

- Passmores House moated site, immediately south of Todd Brook.

12.4.6 There is a single registered Park and Garden in Harlow (The House, Marsh Lane) deemed by English Heritage to have special landscape or historical interest. It is located in the extreme northeast of the District border (see Figure 15). A similar designation is located nearby but bordering the outside of the District, and also to the north of Roydon northwest of the District.

Are there any evidence gaps?

12.4.7 No evidence gaps have been identified at this stage.

12.5 What will be the situation without the plan? (the 'business-as-usual' option)

12.5.1 High levels of growth are planned and, without a Core Strategy, the numerous designated and non-designated sites of historical importance might be threatened. In addition, Gibberd's Master Plan is important to the design and historic feel of Harlow as a former New Town, and a lack of plan may result in development not in keeping with these concepts or a long-term directional change away from this plan. It is also worth noting that opportunities might be lost for the historic environment to contribute towards sustainable forms of growth and the cultural regeneration of the town.

12.6 What issues should be a particular focus for the appraisal?

12.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the historic environment include:

- The need to protect the district's historic environmental assets from inappropriate development
- That development should respect the character, appearance and features of historical designations, in addition to the setting and views into or out of these areas.
- The need to consider the original concept and design for Harlow as a former New Town.

13 Housing

13.1 Introduction

- 13.1.1 Housing is a key policy theme, high on the agenda of both the Government and the public. Part of the Government's aim to create prosperous, inclusive and sustainable communities is that everyone should have the opportunity of living in a decent home at a price they can afford, in a place in which they want to live now and in the future.
- 13.1.2 Neighbourhood renewal and regeneration is considered in Chapter 5 (neighbourhoods).

13.2 What's the policy context?

- 13.2.1 The Government's key housing policy goal, as set out in PPS3: Housing²¹⁴, is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. In particular, the planning system should deliver a "*sufficient quantity of housing taking into account need and demand and seeking to improve choice*". Both PPS3 and PPS1: Sustainable development highlights the need to provide affordable housing.
- 13.2.2 The East of England Plan²¹⁵ states that at least 508,000 net additional dwellings should be provided by LPAs within the region over the period 2001 to 2021. **Policy H1** sets out the indicative minimum that must be provided within Harlow over this period as 16,000. This figure represents total housing growth at Harlow, including urban extensions in Epping Forest and East Herts Districts, split between the three districts as determined through DPDs. **Policy E7: The Region's Airports** states that housing development related to employment growth at Stansted Airport should be located at Harlow and nearby towns, and the Harlow housing allocation should be sufficient for both airport-related and other housing needs, though this will need to be kept under review as the airport develops.
- 13.2.3 Within this overall housing requirement DPDs should set appropriate targets for affordable housing and provision should be made by local authorities for site/pitches to meet the identified needs of Gypsies and Travellers living within or resorting to their area.
- 13.2.4 Although the Government published the East of England Plan in May 2008, the number of additional Gypsy and Traveller pitches that each district will be required to provide was not established. Therefore, the Government has since undertaken a Single Issue Review to the East of England Plan in respect of gypsies and travellers, **Policy H3** Provision for Gypsies and Travellers. The policy was published on 20 July 2009 and states that Harlow District needs to provide a minimum of 15 additional pitches between 2006 and 2011.²¹⁶
- 13.2.5 The general spatial approach taken by the Plan is to concentrate development in urban areas to reflect the polycentric nature of the East of England. To support this ambition **Policy SS3** of the East of England Plan identifies Harlow as one of a number of **Key Centres for**

²¹⁴ Communities and Local Government (2006) *Planning Policy Statement 3: Housing* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> (accessed 1 July 2009).

²¹⁵ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/ (accessed 20 August 2009).

²¹⁶ GOEE (2009) *Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/687221/?a=42496 (accessed 12 October 2009).

Development and Change (KCDC). KCDCs are intended to reflect the “*polycentric nature of the East of England*” and its arrangement of small and medium sized towns and cities surrounded by more rural areas which look to those towns for employment and higher level services. **Policy HA1: Harlow Key Centre for Development and Change** states that the housing allocation for Harlow should put in place a development strategy which promotes Harlow’s regeneration, is as sustainable as possible and can be implemented at the required pace. It will also require planned delivery of additional waste water treatment capacity.

- 13.2.6 Harlow is located within the London Commuter Belt sub-region. The 2005-2008 London Commuter Belt Sub-region Strategy is currently being updated for 2009 onwards. Key priorities are:
- Maximise the delivery of a range of new affordable homes and make best use of existing housing resources to help those in housing need
 - Improve the condition of the housing stock both public and private
 - Build sustainable and thriving neighbourhoods and communities and ensure that vulnerable people are supported in the community
- 13.2.7 Harlow is working with five other authorities to undertake a SHMA for the M11/East LCB sub-region to inform housing policies in the partners’ LDFs.
- 13.2.8 The Harlow Housing Strategy and Action Plan²¹⁷ provides a framework for housing activity and investment within the District, setting out the vision for housing in the Town, the key housing objectives and the aims and objectives relating to individual issues. Four priorities areas are outlined within the Strategy:
- Maximise the delivery of a range of new affordable homes and make the best use of existing resources to help those in housing need
 - Improve the condition of Harlow’s housing stock across all sectors
 - Help develop sustainable and safe communities
 - Provide an efficient and effective housing service that provides value for money
- 13.2.9 Harlow’s LSP has developed the District’s Community Strategy, known as the Harlow 2020 Vision²¹⁸, which must be taken into account when preparing the LDF. The vision includes “*a variety of homes and jobs to meet local needs*”. The Partnership has identified the delivery of affordable housing as a key issue.
- 13.2.10 The Council’s Affordable Housing Supplementary Planning Document (SPD)²¹⁹ clarifies the Council’s policies on affordable housing for the benefit of informing negotiations between the Council, developers and Registered Social Landlords (RSLs). The document sets the proportion of affordable homes that should be aimed for on new housing schemes, the minimum for which was set by the latest ‘Housing Requirements Survey’. Guidelines are given

²¹⁷ Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²¹⁸ Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 18 August 2009).

²¹⁹ Harlow Council (2007) Harlow District Council Affordable Housing Supplementary Planning Document [online] available at: http://www.harlow.gov.uk/docs/Affordable_Housing_Supplementary_Planning_Documenta.doc (accessed 20 August 2009).

for how the Council will determine the type and tenure of dwellings, as well as their design and layout.

13.2.11 The Harlow Common Guidelines SPD²²⁰ sets out guidelines to provide applicants, members and officers with advice in relation to the assessment of proposed domestic property extensions and alterations to ensure that they:

- strengthen, enhance, protect and create local character
- relate to their setting
- where possible, are sustainable

13.2.12 Harlow has developed a Housing Strategy to address the housing needs of the local Black and Minority Ethnic Community that is aimed at:²²¹

- Improving services – through monitoring and training to ensure that high standards are set and achieved.
- Education – to promote better awareness and understanding of existing services that can help people resolve housing related problems.
- Developing services – such as specific schemes and policies to help fill the gaps that remain.

13.2.13 In addition to the LSP, there are a number of other partnerships relevant to Harlow housing:

- Harlow Renaissance – local delivery agency for regeneration projects
- Harlow Social Housing Partnership – The Council has partnered with selected Registered Social Landlords (RSLs) to deliver affordable housing in way that delivers the wider strategic aims of the community
- Stansted Area Housing Partnership – The District Councils of Harlow, Uttlesford, Braintree, East Herts, are addressing affordable housing within a ten-mile radius of the airport following planning permission to increase passenger throughput to 25 million
- Harlow Homeless Prevention Partnership – Carrying forward the Council's Homelessness Strategy
- Private Sector Landlords Forum
- Service Improvement Teams (SITs) – addressing repairs and maintenance, housing management and home ownership
- London Commuter Belt Sub-Region – Partnership of fifteen local authorities (including Harlow) and over twenty RSLs
- Home Improvement Agency (Papworth) – Helping vulnerable people maintain independence in Harlow by repairing or adapting homes.

²²⁰ Harlow Council (2007) *Harlow Common Guidelines Supplementary Planning Document* [online] available at: <http://www.harlow.gov.uk/pdf/Harlow%20Common%20Guidelines%20Supplementary%20Planning%20Documenta.pdf> (accessed 20 August 2009).

²²¹ Harlow Council (2006) *Housing Strategy for Harlow's Black and Minority Ethnic Community* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/black_minority_ethnic_housing.aspx (accessed 20 August 2009).

13.3 What are the key objectives and other decision-making criteria that we need to consider?

13.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Reduce poverty and inequality and promote social inclusion
- Reduce greenhouse gas emissions
- Adapt to the impacts of climate change
- Increase resource efficiency and reduce resource use and waste
- Conserve, restore and enhance the region's natural and built environment
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

13.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee. Relevant priorities include:²²²

- Regenerating the Town
- Promoting a clean, green, healthy and safe environment
- Tackling housing need
- Providing value for money.

13.4 What's the situation now? (including any existing problems)

13.4.1 Harlow is a relatively small, former New Town. It is one of the most densely populated areas in the East of England and is strategically located within the London Commuter Belt Housing Sub-Region – an area of fast population growth due to ease of commuting to London and Europe. The proximity of London to Harlow has led to rising house prices beyond affordability for many local residents.²²³ The average house price (for all types of dwelling) in Harlow in 2006 was £173,647 – this is below the average regional price (£212,186) and national price (£206,715),²²⁴ and prices in Harlow also compare favourably to other neighbouring districts (see Table 15).

²²² Harlow District Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

²²³ Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²²⁴ ONS. *Key Figures for Housing* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 3 September 2009).

Table 15: Property price comparison with other London Commuter Belt local authorities (April 2008 average)²²⁵

Local Authority	Detached Average	Semi Detached Average	Terraced Average	Flat / maisonette	Overall
Harlow	£338,300	£235,600	£184,400	£135,200	£193,500
Brentwood	£552,653	£293,036	£220,411	£191,898	£329,075
Epping Forest	£717,900	£346,200	£267,900	£195,100	£389,000
Uttlesford	£496,700	£289,000	£248,500	£155,600	£350,800
Broxbourne	£494,800	£280,700	£232,800	£156,100	£256,600
East Herts	£555,600	£312,500	£252,200	£188,100	£325,500

- 13.4.2 As has been the trend in neighbouring areas, Harlow has experienced a large increase in average house prices in recent years, as shown in Table 16:

Table 16: Rising cost of buying a home in Harlow²²⁶

Type of home	Average price April 2008	Average price Jan-Mar 2003	Cash increase	Approx % price increase
Detached	£338,300	£269,914	£68,386	20.21
Semi-detached	£235,600	£179,789	£55,811	23.69
Terraced	£184,400	£135,360	£49,040	26.59
Flat/maisonette	£135,200	£95,560	£39,640	29.32
Overall average	£193,500	£142,089	£51,411	26.57

- 13.4.3 The social rented sector accounts for approximately 35% of housing stock compared to 18.4% for England.²²⁷ In April 2006, 66.7% of dwellings in Harlow were owner occupied and private rented, compared to 83.7% in the region and 81.8% nationally.²²⁸ The private rented sector in Harlow is relatively small and expensive compared to other tenures and, coupled with high housing prices, this has resulted in a high demand for affordable housing in Harlow with significant growth in demand over the past decade.²²⁹ Table 17 below shows that the average weekly council rent and Private Landlords (PLs) rent is lower in Harlow than for surrounding districts, as is the Registered Social Landlords (RSLs) rent (apart from East Herts).

²²⁵ Source: Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²²⁶ Source: Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²²⁷ Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²²⁸ ONS *Key Figures for Housing* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 3 September 2009).

²²⁹ Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

Table 17: Average weekly rent in Harlow and surrounding areas²³⁰

Local authority	Council rent (weekly rent £)	RSL rent (weekly rent £)	PLs rent (weekly rent £)
Harlow	63.32	77.66	128.82
Brentwood	67.82	89.41	161.97
Epping Forest	69.51	80.69	137.16
Uttlesford	N/A	77.10	139.64
Broxbourne	N/A	79.57	153.74
East Herts	71.27	87.41	155.06

- 13.4.4 The population of Harlow was estimated in mid-2007 to be 78,300 with an approximate 2.21 persons per household.²³¹ Of the 33,185 households in 2001:²³²
- 30% were one-person household
 - 36% were married couple households
 - 10% were cohabiting couple households
 - 11% were lone parent households.
- 13.4.5 Currently almost 20% of the Harlow population is aged over 60 and 37% of the total population of Harlow is projected to be older persons over the next 15 years. Care and support needs will need to be met by new and existing housing provision.
- 13.4.6 Only 0.6% of dwellings are considered to be unfit in Harlow, compared to 3.2% in the East of England and 4.2% in England.²³³ Harlow is in the top 25% of local authorities for its Decent Homes performance.²³⁴ The Council owns approximately 30% of dwellings in Harlow. The percentage not meeting the Decent Home Standard decreased between April 2006 and March 2007 from 18% to 14.4%.²³⁵ The Council's Private Sector Stock Condition Survey found that the percentage of non-decent homes in Harlow is lower than the national average, the main reason for which is thermal comfort failure. The percentage lacking modern facilities and in need of repair is slightly higher than the national average (see Table 18).²³⁶ Construction of

²³⁰ Source: Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²³¹ Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²³² Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 20 August 2009).

²³³ ONS. *Key Figures for Housing* [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 3 September 2009).

²³⁴ Harlow 2020 Partnership (2008) *Harlow 2020 Vision – Key achievements 2007-08* [online] available at: http://www.harlow2020.org.uk/downloads/key_achievements/harlow_2020_report.pdf (accessed 3 September 2009).

²³⁵ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 20 August 2009).

²³⁶ Source: Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

new homes within the last fifty years is a major factor in the good condition of dwellings, but the local BME Housing Strategy notes that significant works may be required in the near future.²³⁷

Table 18: Private Sector Stock Condition Survey²³⁸

	Number dwellings	Percentage of stock	National average
Total non-decent homes	5,800	24.9%	27.1%
Thermal comfort failure	3,300	14.3%	19.8%
Category 1 hazards	1,200	5.3%	U/K
Lacking modern facilities	400	1.9%	1.3%
In need of repair	2,100	9.3%	8.1%

- 13.4.7 The number of households on the housing register for affordable homes has risen annually between 2005 and 2008 (see Table 19). These high numbers has meant that forecasting and delivering suitable affordable housing is a challenge to Harlow. According to the Housing Strategy, the evidence suggests that social housing stock numbers are not going to meet current demand.²³⁹ However, the 2020 Vision Key Achievements 2007-08 report states that Harlow is on course to achieving its target of at least 33% of homes built on eligible housing developments to be affordable.²⁴⁰

Table 19: Number of households on the housing register for affordable homes in Harlow²⁴¹

	2005	2006	2007	2008
Total number	3303	4008	6234	7005
Increase actual	-	705	2226	771
Percentage increase	-	21.34%	55.54%	12.37%

- 13.4.8 The homelessness rates in Harlow are comparatively high, although the total number accepted as homeless and in priority need has fallen annually between 2004/2005 and 2007/2008. The number of households in Temporary Accommodation (TA) also fell annually between 2003/2004 and 2007/2008, however, it is noted that this figure is still relatively high due to a lack of affordable housing in both the public and private sectors.²⁴²

²³⁷ Harlow Council (2006) *Housing Strategy for Harlow's Black and Minority Ethnic Community* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/black_minority_ethnic_housing.aspx (accessed 20 August 2009).

²³⁸ Source: Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²³⁹ Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²⁴⁰ Harlow 2020 Partnership (2008) *Harlow 2020 Vision – Key achievements 2007-08* [online] available at: http://www.harlow2020.org.uk/downloads/key_achievements/harlow_2020_report.pdf (accessed 3 September 2009).

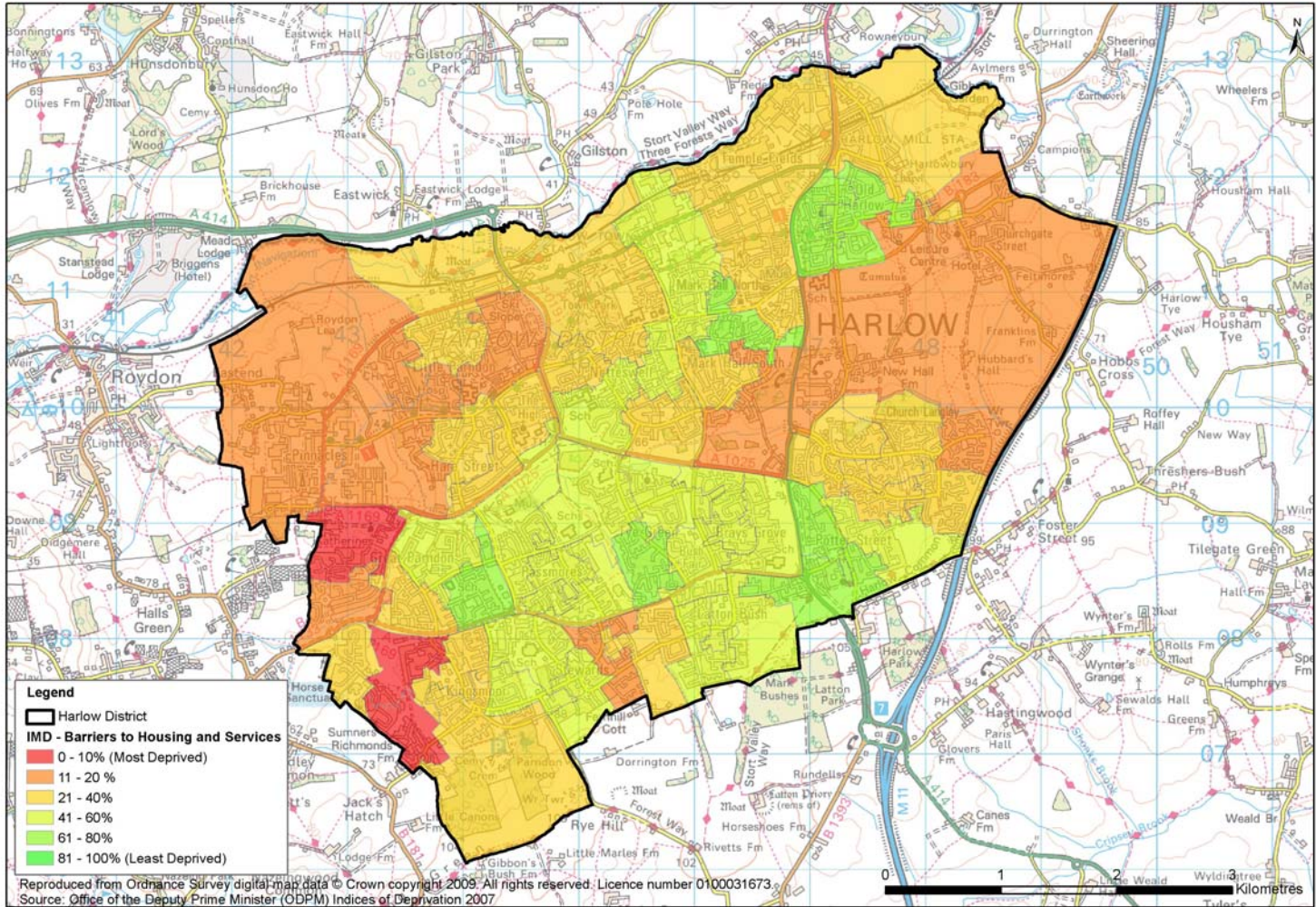
²⁴¹ Source: Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

²⁴² Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

- 13.4.9 There are 36 Gypsy and Traveller pitches in Harlow with a capacity of 72.²⁴³
- 13.4.10 IMD 2007 for Barriers to Housing and Services is mapped in Figure 16. It illustrates that Harlow contains two areas in the west of the District that are in the 10% most deprived nationally (within the wards of Great Parndon and Sumners and Kingsmoor). None of the District contains areas in the 20% least deprived nationally. The western and eastern borders of the District are notably the most deprived in the District.

²⁴³ Harlow Council (2008) *Harlow Housing Strategy and Action Plan 2008-2013* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/housing_services/housing_strategy/harlow_housing_strategy.aspx (accessed 20 August 2009).

Figure 16: IMD 2007 for Housing and Barriers to Services in Harlow



Are there any evidence gaps?

- 13.4.11 The full extent of the impacts from the current recession on housing development and the housing market in Harlow is unknown at this stage.

13.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 13.5.1 The Housing Strategy expects that the current national and international economic recession will have an impact on local housing objectives, given that it is already having a significant effect on the delivery of national housing objectives. A lack of a Core Strategy will make this situation harder to address and the objectives harder to attain.
- 13.5.2 16,000 houses need to be delivered between Harlow, Epping Forest and East Herts; and a lack of a Core Strategy will make this target difficult to achieve and may have a negative impact on the District. Planning for new housing and adequate provision for a growing population, the local community and the local economy is complicated in a District that is primarily a built-up, urban area. Indeed, the town is already beyond the capacity set out in the original Gibberd Master Plan. A plan could assist through a more strategic approach to delivery.
- 13.5.3 Without a Core Strategy, issues such as homelessness and adequate provision of affordable housing may be difficult to address. Moreover, a slowdown in local housing development may reduce the number of developer contributions to the supply of affordable housing. In addition, a lack of a plan may set back the refurbishment of existing housing stock which will likely become an issue in the near future.

13.6 What issues should be a particular focus for the appraisal?

- 13.6.1 In light of the information above, key issues to take into account in the appraisal in relation to housing include:
- To increase the provision of affordable housing
 - To ensure that the appropriate levels of new dwellings are provided over the plan period
 - To ensure that national PDL targets are met
 - To ensure that the housing needs of an ageing (and disabled) population are met
 - The need to provide Gypsy and Traveller pitches, if required
 - The need to ensure that housing delivery contributes to the regeneration of Harlow

14 Land

14.1 Introduction

14.1.1 Harlow is the smallest District in Essex, covering an area of approximately 31 square kilometres. The District is predominantly an urban area – the most densely populated District in Essex and is located in the southwest of the East of England region adjacent to the county of Hertfordshire. Harlow is a former New Town that contains unique Green Wedges (linear open spaces creating discrete neighbourhoods) and also areas of Green Belt on the periphery of the town and District.

14.1.2 Waste has traditionally been seen as an unavoidable by-product of increased prosperity and economic activity. In more recent years the development of new products and materials, and changes in the way they are used has led to a steady growth in the amount and a change in the nature of the waste produced. Disposal of waste has been predominantly to landfill, which has led to environmental problems, including greenhouse gas emissions and liquid pollutants (although modern landfill sites are now much more highly regulated). More recently, increasing concern about the environmental impacts of landfill has led to investigation into alternatives that are more sustainable. Integrated waste management planning is now seen as best practice. Integrated or sustainable waste management attempts to segregate the various components of the waste stream and to manage each in an environmentally sound and economically efficient manner, making use of waste as a resource wherever possible.

14.2 What's the policy context?

Land

14.2.1 PPS3: Housing²⁴⁴ sets a national target that 60% of new dwellings should be built on previously developed land. It also suggests that the density of new residential dwellings should be at least 30 dwellings per hectare to help ensure efficient use of land. The East of England Plan supports this policy and with reference to the phasing of housing development Policy **H3** states that “*the re-use of previously developed land and buildings will be promoted as the first priority*”. Additionally, Policy **SS2** states that 60% of development is to be on previously developed land (this encompasses all development, not just housing). The approach to the location of major development must prioritise the re-use of previously developed land in and around urban areas to the fullest extent possible.

14.2.2 PPG2: Green Belts²⁴⁵ contains a presumption against any development in the green belt that detracts from its purposes which are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and

²⁴⁴ ODPM (2000) *Planning Policy Statement 3: Housing* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> (accessed 17 July 2009).

²⁴⁵ ODPM (1995, amended 2001) *Planning Policy Statement 2: Green Belt* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/ppg2> (accessed 22 July 2009).

- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 14.2.3 In the East of England Plan **Policy SS7: Green Belt** states that the broad extent of green belts in the East of England is appropriate and should be maintained. However, it adds that strategic reviews of green belts are needed in several areas to meet regional development needs at the most sustainable locations. This includes Harlow, involving land in Harlow, East Herts and Epping Forest Districts; and reviews covering more than one local authority should be undertaken through a joint of co-ordinated approach. The Plan adds that the Harlow review should identify compensating strategic extensions to the green belt in East Herts.
- 14.2.4 PPS7 on Sustainable Development in Rural Areas states that new development in the open countryside should be strictly controlled and that priority should be giving to the re-use of previously developed or brownfield land, except in cases where there are no brownfield sites available or these brownfield sites perform poorly in terms of sustainability in comparison with greenfield sites, including accessibility by public transport, walking and cycling, high quality design and inclusiveness. PPS7 also mentions that where significant development of agricultural land is unavoidable, areas of poorer quality should be used in preference to the best and most versatile agricultural land (grades 1, 2 and 3a of the Agricultural Land Classification). Development plans should include policies that identify any major areas of agricultural land planned for developments and may also include policies that protect the best and most versatile areas from development.
- 14.2.5 The 1990 Environmental Protection Act requires local authorities to secure the appropriate remediation of contaminated land and to maintain a register of contaminated land.
- 14.2.6 **Policy ENV4** of the East of England Plan states that agri-environment schemes should be promoted to “*maintain and enhance the quality of soils*”, and that the sustainable use of soil resources should be encouraged, and where soil and land have been degraded, there is the need to maximise opportunities for restoration to beneficial after-uses such as agriculture, woodland, amenity and habitat creation schemes.
- 14.2.7 According to the Environment Agency, derelict brownfield land should not be used where wildlife habitat has evolved.²⁴⁶
- 14.2.8 The Harlow Green Infrastructure Plan²⁴⁷ (GIP) and the Harlow Green Spaces Strategy²⁴⁸ refer to Green Wedges and Green Belt as part of Harlow’s green space. Both of these documents are discussed within the policy context for Chapter 8 Biodiversity and Green Infrastructure.

Waste

- 14.2.9 According to PPS10 Planning for Sustainable Waste Management (2005)²⁴⁹ all planning authorities should, to the extent appropriate to their responsibilities, prepare and deliver planning strategies that:

²⁴⁶ See Appendix 1.

²⁴⁷ Chris Blandford Associates on behalf of Harlow Council (2005) *Green Infrastructure Plan* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=8615> (accessed 13 August 2009).

²⁴⁸ Nortoft et al. on behalf of Harlow Council (2004) *Harlow District Council Green Spaces Strategy*. [not available]

²⁴⁹ CLG (2005) *Planning Policy Statement 10: Planning for Sustainable Waste Management* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/147411.pdf> (accessed 1 July 2009).

- help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for;
 - enable sufficient and timely provision of waste management facilities to meet the needs of their communities;
 - help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations;
 - protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries; and
 - ensure the design and layout of new development supports sustainable waste management.
- 14.2.10 The East of England Plan sets out targets for waste management (**Policy WM2**). The objectives are to eliminate the landfilling of untreated municipal and commercial waste by 2021 and secure at least the following minimum levels of recovery:
- Municipal waste – recovery of 50% at 2010 and 70% at 2015;
 - Commercial and industrial waste – recovery of 72% at 2010 and 75% at 2015.
- 14.2.11 Essex County Council has pledged to increase recycling of waste to over 45% in 2009, over 50% in the next three years, and towards a long term aim of 60% by 2020. Harlow District is a member of the Essex Waste Partnership. The Essex Waste Strategy²⁵⁰ states that Essex authorities will work hard to reduce the amount of waste produced and to increase re-use of waste. The county favours composting technologies for organic wastes, and the introduction of new Mechanical Biological Treatment (MBT) plants to dispose of additional waste. An action plan is in preparation.
- ## 14.3 What are the key objectives and other decision-making criteria that we need to consider?
- 14.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:
- Promote sustainable growth within environmental limits
 - Increase resource efficiency and reduce resource use and waste
 - Conserve, restore and enhance the region's natural and built environment.

²⁵⁰ Essex County Council (undated) *Essex Waste Strategy 2007-2032* [online] available at: http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/content/binaries/documents/Waste_Strategy_-_version_approved_by_ECC_Full_Council_on_15.07.08.pdf?channelOid=null (accessed 3 September 2009).

14.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee.²⁵¹ Relevant priorities include:

- Promoting a clean, green, healthy and safe environment.

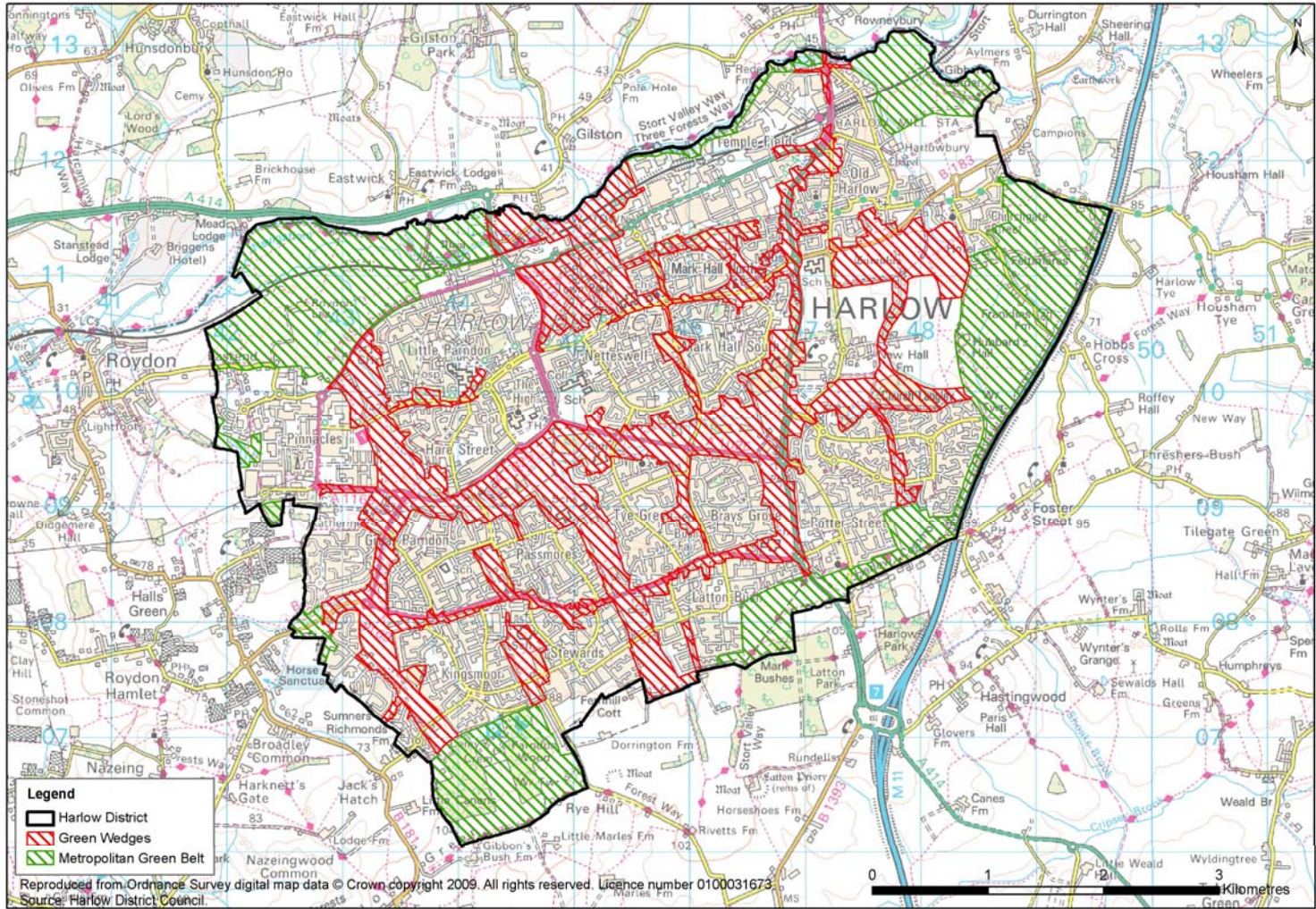
14.4 What's the situation now? (including any existing problems)

14.4.1 Although Harlow is primarily an urban area, Figure 17 illustrates the large areas of Green Belt and Green Wedges in Harlow. These areas prevent neighbourhood coalescence, shaping the unique character of Harlow town and its sense of community, and also shaping development. Green Belt is located on the peripheries of the District, whereas Green Wedges distinguish the neighbourhoods in the centre of the District. The Gibberd plan shaped the development of Harlow and was based on the concept of self-sufficient neighbourhoods. It allowed for the designation of large landscaped areas or 'Green Wedges' to separate out neighbourhoods and compensate for smaller garden spaces; these remain a *"fundamental element of the network of green spaces within Harlow"*. The town also contains a Town Park and other smaller green spaces of 'internal open space' exist within the residential and business areas of the town in addition to areas of 'incidental open space'.²⁵²

²⁵¹ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

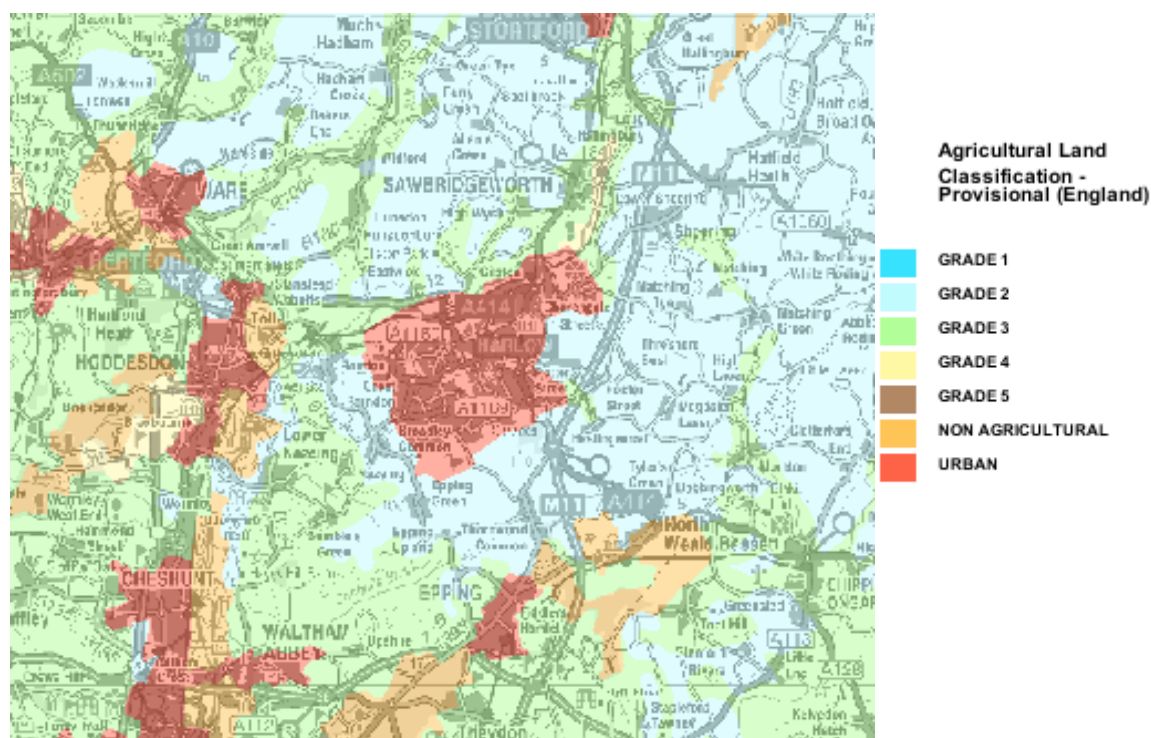
²⁵² Nortoft et al. on behalf of Harlow Council (2004) *Harlow District Council Green Spaces Strategy* [not available online]

Figure 17: Land constraints in Harlow



- 14.4.2 The Agricultural Land Classification for Harlow District is that of an urban area (see Figure 18 below), however; the periphery of the District and the neighbouring areas contain land of a high agricultural quality (Grade 2 and Grade 3) and are of a traditional farmland character. The soil types on the periphery of the District include: surface water gleys to the southwest; pelosols to the south and east, and; water and brown soils to the northwest and northeast.²⁵³

Figure 18: Agricultural Land Classification²⁵⁴



- 14.4.3 The waste and recycling performance of Harlow is compared against other authorities within the county in Table 20, using the National Indicators (NIs) that took effect from April 2008. Although the amount of residual waste per household in Harlow is below the county average, Harlow has the fourth highest value amongst the districts. In terms of household waste sent for reuse, recycling, composting or anaerobic digestion (AD), Harlow (23.88%) is considerably below the county average (38.07%) and sends the second least of the authorities in Essex. Harlow also sends the second most waste to landfill of all the authorities in Essex (76.12%), notably more than the county average (60.24%).

²⁵³ Chris Blandford Associates (2004) *Harlow Area Landscape and Environment Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/harlow_area_land_scape_study.aspx (accessed 3 September 2009).

²⁵⁴ Source: MAGIC (2009) *Agricultural Land Classification* [online] available at: www.magic.gov.uk (accessed 3 September 2009).

Table 20: Waste and Recycling performance of Harlow within Essex 2007/08²⁵⁵

	Residual household waste per household (not recycled, composted, reduced or sent for AD) (kg) – NI191	Household waste sent for reuse, recycling, composting or AD (%) – NI192	Municipal waste landfilled (%) – NI193
Basildon	699	32.23	69.37
Braintree	538	42.79	59.71
Brentwood	529	41.20	62.94
Castle Point	691	27.07	74.21
Chelmsford	703	35.37	66.83
Colchester	567	33.09	67.77
Epping Forest	564	41.67	58.33
Harlow	627	23.88	76.12
Maldon	576	34.89	65.11
Rochford	758	19.39	80.61
Tendring	526	26.90	73.16
Uttlesford	429	54.26	51.32
Essex CC (RCHW only)	117	51.63	42.62
Essex Total (incl. RCHW)	722	38.07	60.24

- 14.4.4 In Harlow, the amount of domestic waste recycled or composted increased (approximately) from 21% in 2006/07 to 24% in 2007/08. Harlow does not operate a full kerbside green waste collection service, as it is considered that this brings extra waste into the waste stream that could be composted at home. This could contribute to poorer performance figures against other authorities and the Harlow 2020 Partnership considers the District's performance to be good overall for dry recycling, given that it operates this system. Another positive trend is that the amount of household waste collected per head of the population reduced by approximately 2.6% for 2007/08.²⁵⁶

Are there any evidence gaps?

- 14.4.5 The location of contaminated land within the district is not currently available.

14.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 14.5.1 Without the Core Strategy Harlow may develop areas of land that are not the most sustainable option and that may not be in keeping with the Green Belt and Green Wedges that characterise

²⁵⁵ Source: Essex County Council (undated) *Joint Municipal Waste Management Strategy for Essex (2007 to 2032)* [online] available at: <http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/dis/gui.jsp?channelOid=16959&guideOid=43565> (accessed 3 September 2009).

²⁵⁶ Harlow 2020 Partnership (2008) *Harlow 2020 Vision – Key achievements 2007-08* [online] available at: http://www.harlow2020.org.uk/downloads/key_achievements/harlow_2020_report.pdf (accessed 3 September 2009).

the District. In addition, the District may not close the gap with the rest of the county in terms of effectively dealing with the waste that it generates.

14.6 What issues should be a particular focus for the appraisal?

14.6.1 In light of the information above, key issues to take into account in the appraisal in relation to land include:

- To ensure that development takes into account the Green Belt and Green Wedges that characterise the District
- The need to identify, avoid and if appropriate remediate contaminated land in the district
- That the District's achievements in reduce, re-use and recycling of waste, are poor in comparison to the county average
- The need to consider the regeneration benefits that may result from the growth of Harlow.

15 Landscape

15.1 Introduction

- 15.1.1 Landscape is more than just a visual backdrop; it is an invaluable natural and socio-economic resource, which allows us to better understand our locality and helps us to define our sense place and who we are. A short but comprehensive description of landscape is:

“an area, as perceived by people, whose character is the result of action and interaction of natural and/or human factors”.

- 15.1.2 Nationally, the most valued landscapes might be found in the countryside, where semi-natural landscapes result from a long interaction of natural and socio-economic factors. However, landscape is a subjective concept that can be used in different situations and at a range of scales. Some landscapes might be of great local importance, even though they would not even be perceived as a distinct landscape by those without local knowledge. This can include landscapes might be distinctive because of the degree to which they have been modified by humans.
- 15.1.3 It is important to consider landscape in its own right, but it can be seen that landscape is closely linked to a number of other topics for which we are seeking to develop and test through this SA.

15.2 What's the policy context?

- 15.2.1 The UK ratified the European Landscape Convention²⁵⁷ in 2006. The Convention aims to encourage public authorities to adopt policies and measures for protecting, managing and planning landscape throughout Europe. PPS7 emphasises that planning authorities should ensure that the quality and character of the wider countryside is protected and, where possible enhanced. This includes the protection of locally valued areas that are undesignated nationally, which can be protected through specific policies included in LDFs.
- 15.2.2 The East of England Plan²⁵⁸ contains a policy dedicated to landscape and many provisions for the consideration of landscape within other policies. **Policy ENV2: Landscape Conservation** emphasises that the highest levels of protection should be afforded to the Region's nationally designated landscapes, and also states that planning authorities and other agencies are advised to implement this policy by developing area-wide strategies, based on Landscape Character Assessments; and to give priority to those areas subject to most growth and change. **Policy ENV2** should be complimented by **Policy ENV1: Green Infrastructure**.

²⁵⁷ More information about the European Landscape Convention is available at:
<http://www.coe.int/t/dg4/cultureheritage/Conventions/Landscape/> (accessed 21 July 2009).

²⁵⁸ GOEE (2008) *East of England Plan* [online] available at:
http://www.gos.gov.uk/goee/docs/Planning/Regional_Planing/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 3 September 2009).

15.2.3 The Harlow Area Landscape and Environment Study²⁵⁹ was intended to provide a key evidence base for strategic planning, identifying constraints and opportunities for growth in areas in and around Harlow.

15.2.4 The Stort Valley Feasibility Study was commissioned by Harlow District Council to explore the recommendation through the Harlow Area Green Infrastructure Plan to create a new strategic park in the Stort Valley, as an extension to the Lee Valley Regional Park. The proposal would provide a *“strategic coordinated approach to the management of ecological, landscape, heritage, access and recreation of the Lea and Stort river corridors, as key components of the green infrastructure network”*.²⁶⁰

15.3 What are the key objectives and other decision-making criteria that we need to consider?

15.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow’s town centre. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Conserve, restore and enhance the region’s natural and built environment

15.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council’s Sustainability Strategy and approved in January 2009 by the Environment and Community Committee. Relevant priorities include:²⁶¹

- Promoting a clean, green, healthy and safe environment

15.4 What’s the situation now? (including any existing problems)

15.4.1 The original Harlow Master Plan utilised a ‘landscape-led’ approach for Harlow, which shaped the town’s urban environment and linked strongly to the surrounding countryside. In addition to Green Wedges – linear open spaces – forming the urban structure of the town’s neighbourhoods, and the Green Belt on the periphery of the District (see Figure 17 in chapter 14 Land), the District contains large amounts of designated open space (see Figure 5 chapter 8 Biodiversity and Green Infrastructure). The Town has numerous physical and visual links from the town centre to the surrounding countryside through these Green Wedges, which *“encapsulate natural features such as valleys, woods, brooks”*. The Stort river corridor separates the town from the undulating and rolling landscape to the north, and there is a

²⁵⁹ Chris Blandford Associates (2004) *Harlow Area Landscape and Environment Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/harlow_area_land_scape_study.aspx (accessed 3 September 2009).

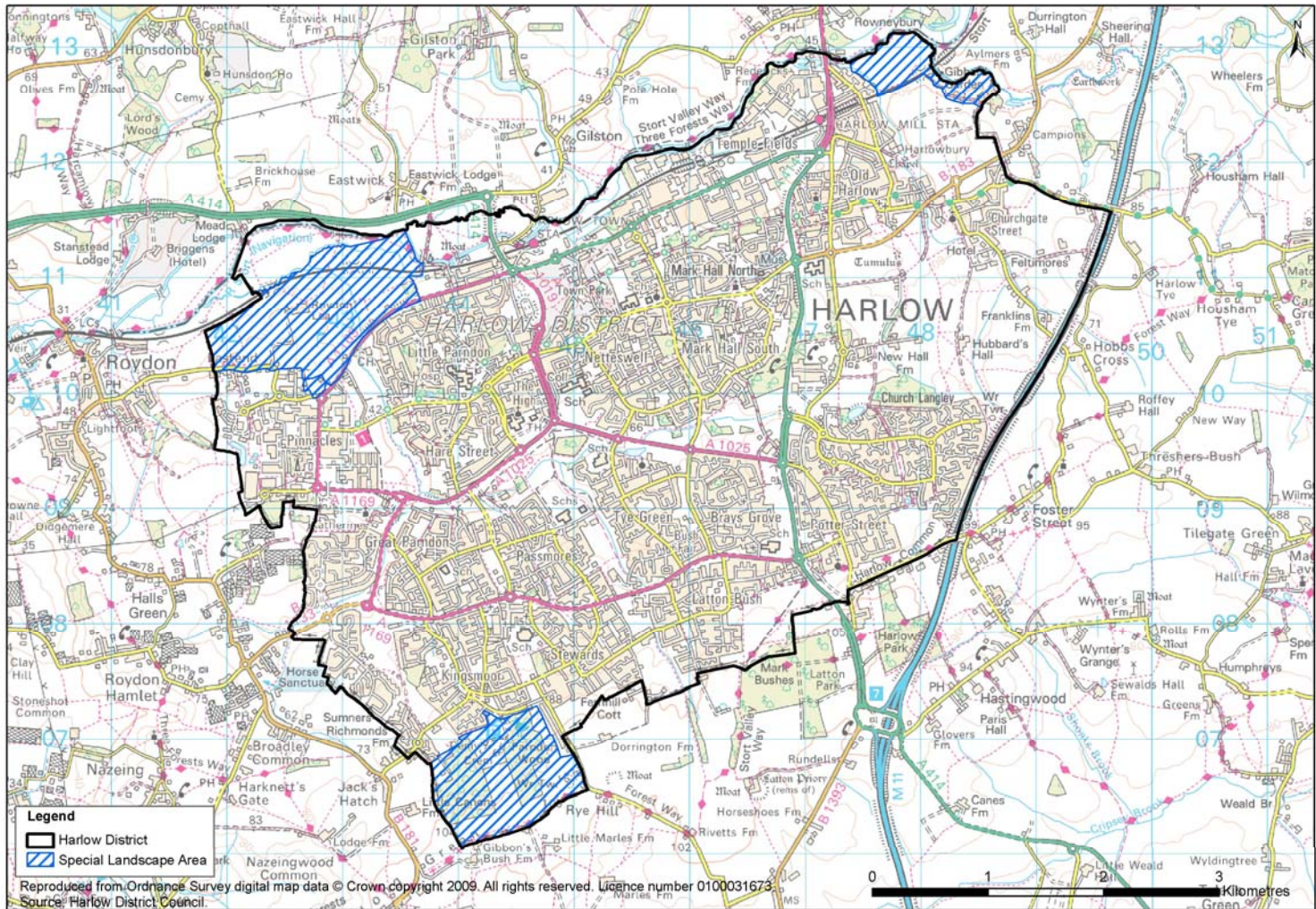
²⁶⁰ The Landscape Partnership (2009) *Stort Valley Feasibility Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/stort_valley_feasibility_study.aspx (accessed 3 September 2009).

²⁶¹ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

pronounced north-facing ridge slope to the south of the town which “*visually and physically contains the urban area from the open countryside to the south*”.²⁶²

²⁶² Chris Blandford Associates on behalf of Harlow Council (2005) *Green Infrastructure Plan* [online] available at: <http://www.harlow.gov.uk/Default.aspx?page=8615> (accessed 3 September 2009).

Figure 19: Landscape constraints in Harlow



- 15.4.2 Harlow District is located within the National Character Area (NCA) 86: South Suffolk and North Essex Clayland. It lies in the south of this area, close to the border with the Northern Thames Basin NCA 111. NCA 86 is “*Broadly flat, chalky, boulder clay plateau dissected by undulating river valley topography, particularly marked in upper valley reaches, which are much smaller in scale*”.²⁶³
- 15.4.3 Although a small, predominantly urban District; Harlow contains a number of diverse Landscape Character Areas of different characteristic types and sensitivities, as outlined in Tables 21 and 22. Elevation of the District increases from north to south.

Table 21: Landscape Character Areas of Harlow District²⁶⁴

Description of LCA
<p>Harlow Major Urban Area (18) Landform - Narrow, flat valley bottom Landscape pattern - Generally small-scale and often discontinuous Character of skyline - Varied rural and urban, but generally immediate Inter-visibility - Limited by vegetation Rare landscape features - Some nature conservation and historic features Settlement pattern/communication routes - Intact historic waterway landscape Sense of enclosure - High Sense of tranquillity/remoteness - Moderate, often influenced by urban areas Historic landscape time-depth and stability - Moderate, generally intact historic landscape</p>
<p>Roydon and Nazeing Plateau (17A) Landform - Sloping valley side Landscape pattern - Medium scale and irregular Character of skyline - Generally open and extensive, particularly to north Inter-visibility - Widely visible Rare landscape features - Limited Settlement pattern/communication routes - Nucleated roadside settlement Sense of enclosure - Generally open outside of urban areas Sense of tranquillity/remoteness - Limited Historic landscape time-depth and stability - Some time depth, urban areas dominate</p>
<p>Jack's Hatch to Church Langley Ridge (20A) Landform - Gentle ridge Landscape pattern - Mixed, but generally moderate to large in scale Character of skyline - Open Inter-visibility - Visible from local areas, key aspect of the setting of areas 18 and 21 Rare landscape features - Dense concentrations of historic and nature conservation assets Settlement pattern/communication routes - Limited settlement Sense of enclosure - Open Sense of tranquillity/remoteness - Limited Historic landscape time-depth and stability - Generally good, but limited in places</p>
<p>Jack's Hatch to Church Langley Ridge (20B) Landform - Very gentle undulating valley head Landscape pattern - Generally moderate to large-scale and irregular Character of skyline - Contained to east by topography; urban to west Inter-visibility - Limited by topography and urban areas Rare landscape features - Few historic and nature conservation assets Settlement pattern/communication routes - Limited settlement</p>

²⁶³ Natural England (undated) *National Character Area 86: South Suffolk and North Essex Clayland* [online] available at: http://www.naturalengland.org.uk/Images/ica086-southsuffolkandnortheessexclayland_tcm2-21188_tcm6-5398.pdf (accessed 3 September 2009).

²⁶⁴ Source: Chris Blandford Associates (2004) *Harlow Area Landscape and Environment Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/harlow_area_land_scape_study.aspx (accessed 3 September 2009).

Description of LCA

Sense of enclosure - Contained by urban/transport and topography

Sense of tranquillity/remoteness - Very limited

Historic landscape time-depth and stability - Generally limited

Little Hallingbury Ridges and Slopes (15)

Landform - Undulating ridge and slope

Landscape pattern - Open and large scale

Character of skyline - Variable dependent on location

Inter-visibility - Moderate, but mixed with some interconnections

Rare landscape features - Some nature conservation and keynote historic features

Settlement pattern/communication routes - Dispersed historic pattern, generally intact

Sense of enclosure - Variable, reflecting topography

Sense of tranquillity/remoteness - Limited

Historic landscape time-depth and stability - Some notable elements, e.g. hill-fort but generally very limited

River Stort (12)

Landform - Narrow, flat valley bottom

Landscape pattern - Generally small-scale and often discontinuous

Character of skyline - Varied rural and urban, but generally immediate

Inter-visibility - Limited by vegetation

Rare landscape features - Some nature conservation and historic features

Settlement pattern/communication routes - Intact historic waterway landscape

Sense of enclosure - High

Sense of tranquillity/remoteness - Moderate, often influenced by urban areas

Historic landscape time-depth and stability - Moderate, generally intact historic landscape

Table 22: Sensitivity of Harlow District's Landscape²⁶⁵

LCA	Landscape Character Type	Sensitivity of LCA
18 Harlow Major Urban Area	Major Urban Areas	Sensitivity to: Very large-scale urban development - High Substantial urban developments - High Small-scale urban developments - Moderate
17A Roydon and Nazeing Plateau	Plateaus	Sensitivity to: Very large-scale urban development - High Substantial urban developments - High Small-scale urban developments - Low
20A Jack's Hatch to Church Langley Ridge	Ridges	Sensitivity to: Very large-scale urban development - High Substantial urban developments - High Small-scale urban developments - Moderate
20B Jack's Hatch to Church Langley Ridge	Ridges	Sensitivity to: Very large-scale urban development - Low Substantial urban developments - Low Small-scale urban developments - Low
15 Little Hallingbury Ridges and Slopes	Ridges and Slopes	Sensitivity to: Very large-scale urban development - Moderate Substantial urban developments - Moderate Small-scale urban developments - Low
12 River Stort	Valley Floodplains	Sensitivity to: Very large-scale urban development - High Substantial urban developments - High Small-scale urban developments - Moderate

Are there any evidence gaps?

15.4.4 No existing evidence gaps have been identified.

15.5 What will be the situation without the plan? (the 'business-as-usual' option)

15.5.1 Although a small, predominantly urban District; Harlow has a number of LCAs of different types and particular sensitivities. Without the Core Strategy the distribution of development is unlikely to proceed in the most sustainable manner sympathetic to these sensitivities.

15.6 What issues should be a particular focus for the appraisal?

15.6.1 In light of the information above, key issues to take into account in the appraisal in relation to landscape include:

- The need to protect the district's landscape assets from inappropriate development

²⁶⁵ Source: Chris Blandford Associates (2004) *Harlow Area Landscape and Environment Study* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/local_development_framework/harlow_area_landscape_study.aspx (accessed 3 September 2009).

- Where develop proceeds, particularly in greenfield areas, there is a need to ensure that landscape assets are protected and integrated to maximise their potential amenity value

16 Transport

16.1 Introduction

- 16.1.1 Transport plays a vital role in supporting sustainable development. In economic terms an efficient and well managed transport network connects localities and regions to national and international markets, secures the localised benefits of agglomeration economies and underpins private sector productivity gains. In social terms good connectivity can stimulate labour market flexibility through improvements in accessibility, allowing a wider range of the population to access employment opportunities. Environmental impacts can be reduced by sustainable transport schemes which may include fast, efficient and affordable public transport as well as the provision of walking and cycling infrastructure. Harlow's Core Strategy should play a key role in encouraging spatial development which leads to sustainable transport patterns in the District and beyond.

16.2 What's the policy context?

- 16.2.1 PPG13: Transport (2002)²⁶⁶ states that quality of life depends upon transport and easy access to jobs, shopping, leisure facilities and services. PPG13's objectives include the integration of planning and transport at the national, regional, strategic and local level in order to promote more sustainable transport choices for both people and moving freight; promote accessibility to jobs and services by public transport, walking and cycling; and reduce the need to travel, especially by car. The guidance also recognises the role of walking and cycling in reducing air pollution.
- 16.2.2 Transport 2010: The Ten-Year Plan (July 2000)²⁶⁷ and Progress Report (2003) set out a strategy to tackle congestion and pollution by improving all types of transport (rail, road, public and private). Targets include: a 50% increase in rail use (measured by passenger kilometres); an 80% increase in rail freight; and a 10% increase in bus passenger journeys, and the approach is based on:
- integrated transport;
 - public and private partnership between the government and private sector; and
 - new projects to modernise the transport network.
- 16.2.3 The Future of Transport: A Network for 2030 White Paper (2004)²⁶⁸ updated the 'Transport 2010' policies and examined the factors that will shape travel and transport over the next thirty years. It sets out how the Government will respond to the increasing demand for travel, maximising the benefits of transport while minimising the negative impact on people and the environment. Key objectives include: improving the flow on local roads; improving the reliability of buses; encouraging walking and cycling; better management of road networks; using technology to keep people better informed; promoting school and workplace travel plans and

²⁶⁶ ODPM (2001) *Planning Policy Guidance 13: Transport* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155634.pdf> (accessed 30 June 2009).

²⁶⁷ DfT (2000) *Transport Ten Year Plan 2000* [online] available at: <http://www.dft.gov.uk/pgr/regional/policy/transport2010/transport2010meetingthelocal3735> (accessed 30 June 2009).

²⁶⁸ DfT (2004) *Future of Transport* [online] available at: <http://www.dft.gov.uk/about/strategy/whitepapers/previous/fot> (accessed 30 June 2009).

public transport improvements; more demand responsive transport; and making services more accessible to improve travel choice.

- 16.2.4 The East of England Plan²⁶⁹ contains the Regional Transport Strategy (RTS) to support the spatial development strategy in the plan and provides a framework for the delivery of transport infrastructure and service improvements within the region. This is a two-way process since the Plan should also take account of sub-regional and local strategies and programmes as they evolve. To implement the overall vision of the Plan the RTS gives a clear priority to increasing travel by more sustainable modes, whilst also recognising the importance of the road network. Objectives include:
- managing travel behaviour and the demand for transport with the aim of reducing the rate of road traffic growth;
 - encouraging efficient use of existing transport infrastructure;
 - enabling the provision of the infrastructure and transport services necessary to support both existing development and that proposed in the spatial strategy; and
 - improving access to jobs, services and leisure facilities.
- 16.2.5 **Policy T5** states that *“Improvements to inter-urban public transport should be focussed on the Regional Transport Nodes”*, with Harlow listed as a Node. Improvement will include: facilitating movement between Nodes; facilitating access to London and national networks, and; improving interchange between modes and the integration of strategic and local networks. The Policy objective is to *“enable more inter-urban movements by public transport and to provide links between modes and with local services”*. Measures should include:
- improved access, particularly by sustainable local transport, to main line railway stations;
 - improvements to rail services to enhance capacity and passenger comfort;
 - facilities to support and encourage high quality interurban bus / coach services, particularly east-west links and
 - other situations where rail is not available, co-ordinated with rail and local public transport; and
 - strategic park and ride with the aim of reducing car use.
- 16.2.6 **Policy T15: Transport Investment Priorities**, identifies the London to Stansted corridor, including Harlow and access to Stansted Airport, amongst a number of areas likely to come under increasing transport pressure as a result of underlying traffic growth and the development strategy of the RSS.
- 16.2.7 **Policy HA1: Harlow Key Centre for Development and Change** of the Plan sets out the following transport priorities for Harlow:
- achieving a major increase in the use of public transport, walking and cycling
 - enhancing access between Harlow and London, Stansted and Cambridge

²⁶⁹ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 7 September 2009).

- addressing traffic congestion for movements within and across the town without encouraging an increase in car use
 - measures to support the town's regeneration and growth and improve access to the strategic highway network from key employment sites.
- 16.2.8 The Second Essex Local Transport Plan (LTP2) 2006 to 2011²⁷⁰ concentrates on how the county will deliver 'shared priorities' for transport through a transport strategy. LTP2 has five objectives:
- Tackling Congestion
 - Delivering Accessibility
 - Creating Safer Roads
 - Promoting Better Air Quality
 - Enhancing Maintenance.
- 16.2.9 LTP2 uses an area-based approach to tailor strategies with a regional and local perspective. The Area Transport Delivery Strategy for Harlow and the Stansted/M11 Corridor identifies the wider challenges facing transport in this area, such as from the housing allocation in the Harlow Area, current ongoing development, existing congestion, and possible airport expansion. The Delivery programme for the area is set out in Table 23.

Table 23: Delivery programme for Harlow and the Stanstead/M11 corridor

Proposal	Funding Source	Cost £000	Delivery Body
Major Schemes			
M11 Junction 7 – congestion improvements	LTP HA	50,000	ECC HA
M11 Route Management Strategy	HA TPI	HA Funded	HA
M25 Widening junction 26 to 31	HA TPI	HA Funded	HA
Delivering Accessibility			
Community Transport Interchange Pilot	LTP	500	ECC
Providing Safer and More Accessible Crossings	LTP/Dev	14	ECC
Public Rights of Way	LTP/Dev	739	ECC
Walking and Cycling	LTP/Dev	1,205	ECC
Bus and Rail Interchange Enhancements	LTP/Dev	835	ECC
Rural Transport Hubs	LTP	200	ECC
Tackling Congestion			
Driver Telematics & Incident & Parking Management	LTP/Dev	350	ECC
Providing Safer Crossings	LTP/Dev	1,495	ECC
Quality Bus Partnership	LTP/Dev	2,122	ECC
Short term congestion relief in the RICs and towns	LTP/Dev	500	ECC
Countywide Programme			
Countywide schemes	LTP/Dev	7,130	ECC

²⁷⁰ Essex County Council () *Second Essex Local Transport Plan (LTP2) 2006 to 2011* [online] available at: <http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/dis/guc.jsp?channelOid=16819&guideOid=39939&guideContentOid=44746> (accessed 07 September 2009).

- 16.2.10 Harlow is designated a Key Centre for Development and Change in the Plan. KCDCs are recognised as main drivers of economic growth in the region; where public transport accessibility is at its best and has the most scope for improvement, and where there is the greatest potential to build on existing concentrations of activities and physical and social infrastructure.²⁷¹
- 16.2.11 The Harlow 2020 Vision 2006-09 states that, with regards to transport, the LSP will work towards:²⁷²
- Developing and implementing initiatives that help to make Harlow a safe and convenient place to travel around and visit
 - Ensuring that reliable public transport is accessible to all sections of the Harlow community;
 - Ensuring that Harlow is able to exploit fully its geographical position in relation to major regional economic developments, by developing transport networks in our area.

16.3 What are the key objectives and other decision-making criteria that we need to consider?

- 16.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow's town centre. Particularly relevant objectives include:
- Promote sustainable growth within environmental limits
 - Reduce poverty and inequality and promote social inclusion
 - Reduce greenhouse gas emissions
 - Promote employment, learning, skills and innovation
 - Increase resource efficiency and reduce resource use and waste
 - Conserve, restore and enhance the region's natural and built environment
 - Move goods and people sustainably
 - Meet the needs of the changing regional demographic.
- 16.3.2 Harlow also has a number of key priorities for 2009/10 to 2012/13 as outlined in the Council's Sustainability Strategy and approved in January 2009 by the Environment and Community Committee.²⁷³ Relevant priorities include:
- Regenerating the Town
 - Promoting a clean, green, healthy and safe environment
 - Improving Harlow for business.

²⁷¹ Capita Symonds on behalf of EERA (2009) *Regional Flood Risk Appraisal* [online] available at: <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/regional-flood-risk-appraisal/> (accessed 14 August 2009).

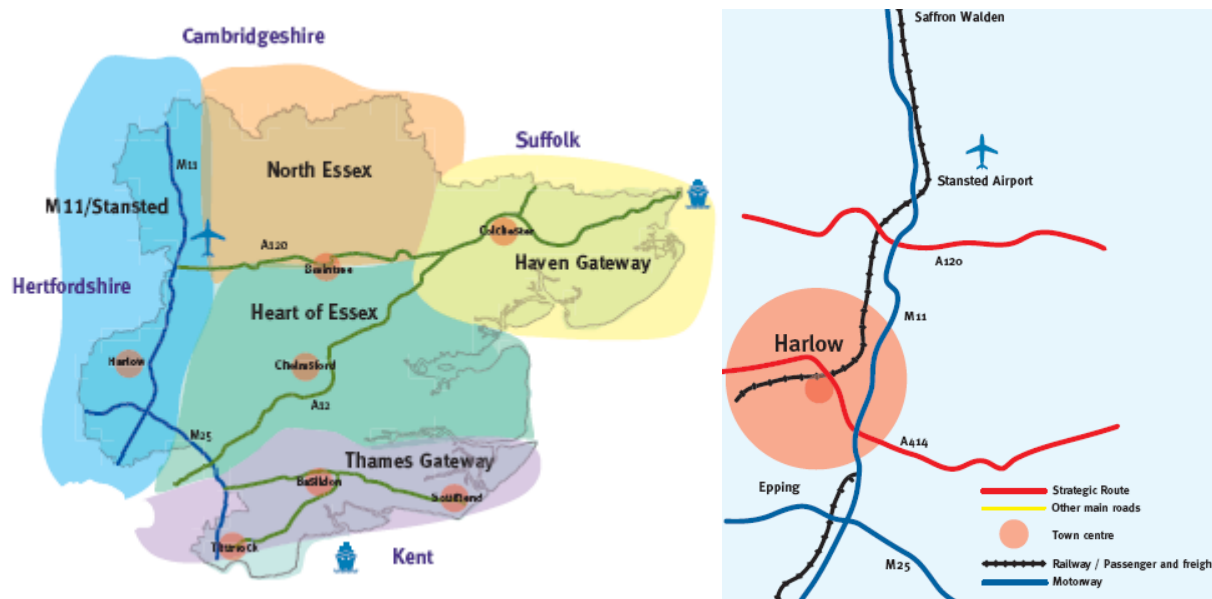
²⁷² Harlow 2020 Local Strategic Partnership Board (2006) *Harlow 2020 Vision 2006-09* [online] available at: <http://www.harlow2020.org.uk> (accessed 7 September 2009).

²⁷³ Harlow Council (2009) *Harlow Sustainability Strategy* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/corporate_services/policy_and_performance/sustainability_strategy.aspx (accessed 13 August 2009).

16.4 What's the situation now? (including any existing problems)

- 16.4.1 Harlow is a regional transport node and is part of the Harlow and Stansted / M11 Corridor strategy area for Essex (see Figure 20).

Figure 20: Harlow and Stansted/M11 Corridor



- 16.4.2 Harlow, located in the south of the East of England close to London, and has excellent access to the major international airport of Stansted (20 minutes away), Cambridge, London, and links to the M25 and the Channel Tunnel. Key transport routes are provided by the M11 and A414, and the local rail provides direct rail links to London via the London Liverpool Street line of the West Anglia Network. This provides direct access to London, Stansted Airport and Cambridge (with onward connections to the East Coast Mainline, Norwich and Kings Lynn).²⁷⁴ Harlow Town and Harlow Mill train stations are located in the north of the district, with the train line running west-east in the District. There is another station located at Roydon to the west of the District. However, *“while Harlow is well located in terms of proximity to Stansted and the M11, the current strategic transport linkages are currently inadequate and compromise the original vision for transport and connectivity by Gibberd”*²⁷⁵.
- 16.4.3 The M11 and the A414 carry large volumes of traffic and have a direct influence upon the daily traffic patterns and conditions in Harlow and on the immediately adjacent highway network. The most notable area of congestion is on the routes and links to Junction 7 of the M11 (Harlow's principal access to the strategic motorway network), but primarily on the A414 (a busy, major intra-regional highway route, serving both local traffic and longer distance through traffic connecting to the motorway network). The main highway links and junctions throughout Harlow regularly experience congestion and delay, and this is likely to get worse as car ownership continues to rise and the delivery of the planned major new housing and employment within and around the town. Furthermore, the reliance on only one junction is

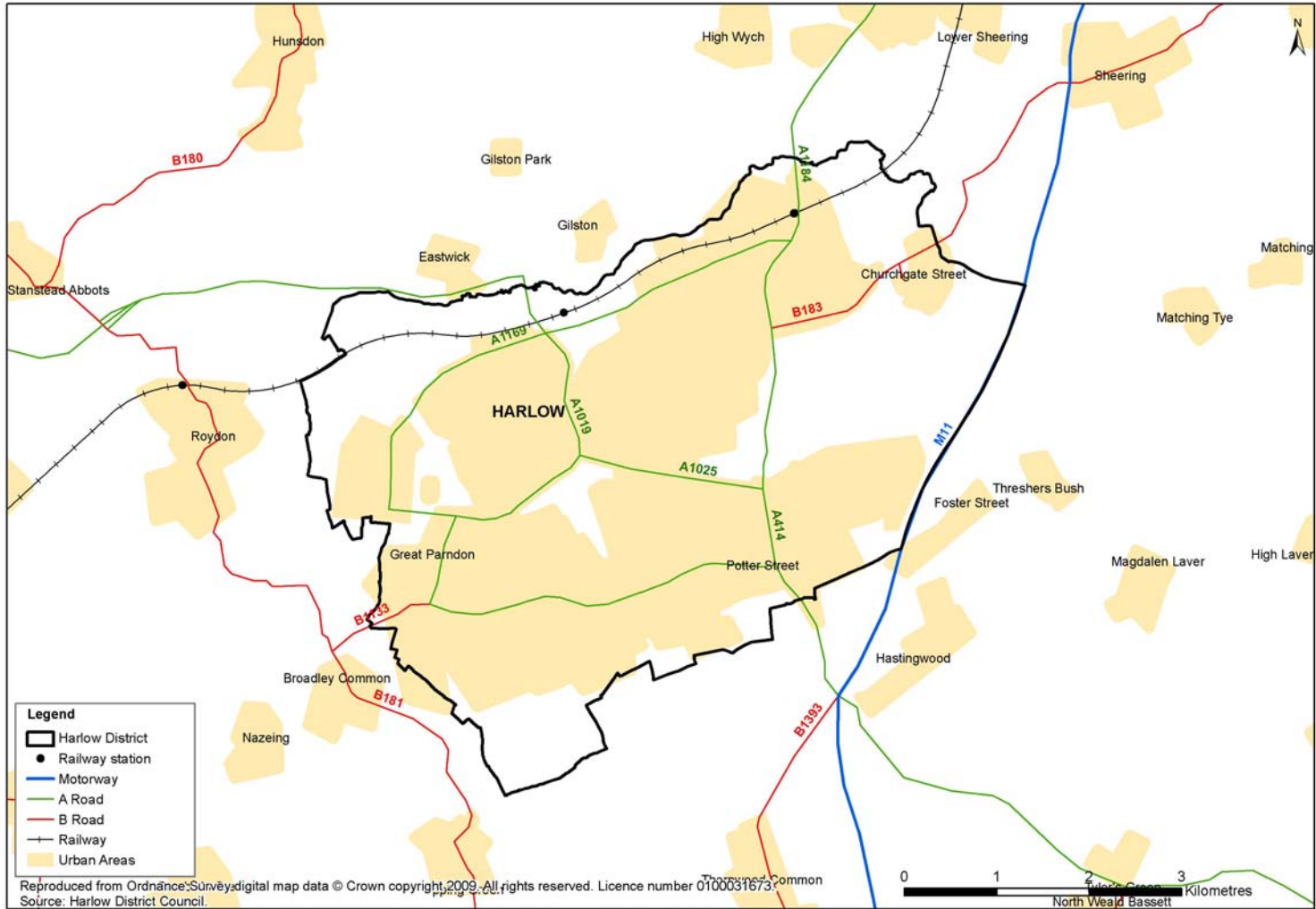
²⁷⁴ Atkins and Roger Tym and Partners (2009) *Harlow Infrastructure Study – Draft Final Report* [not available online]

²⁷⁵ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 7 September 2009).

unusual for a town of the size and character of Harlow.²⁷⁶ Other major roads include: the A1184 – provides access to Harlow and Junction 7 of the M11 (via A414) and Sawbridgeworth to the north; the A1169 – links to the A414; the B181 – runs north-south from Roydon to Epping and provides access to the A414; the B1393 – runs north-south, and; the B180. A map of the key transport routes in and around Harlow District is shown in Figure 21.

²⁷⁶ Atkins and Roger Tym and Partners (2009) *Harlow Infrastructure Study – Draft Final Report* [not available online]

Figure 21: Transport routes in and around Harlow District



- 16.4.4 The Harlow area also has several public footpaths and bridleways, to include Stort Valley Way and Three Forests Way, and National Cycle Route 1 runs through the area.
- 16.4.5 2001 census data shows that, although the average distance travelled to work is higher for the East of England (15.88km) than nationally (13.31km), it is lower in Harlow (11.78km) than for both these spatial areas. A notably smaller percentage of people work from home in Harlow District (6.41%) than regionally (9.44%) and nationally (9.16%). Less people travel to work by train in the District (4.23%) than regionally (6.05%), but more travel to work by bus (5.04% to 3.99%), taxi (1.22% to 0.45%) and as a car or van passenger (8.09% to 5.84%).²⁷⁷
- 16.4.6 The original design of Harlow was for a population of 60,000 people with limited provision for cars. However, the amount of car owners and car dependents has clearly since increased considerably and the population of Harlow has grown to nearly 80,000. For example, the census statistics above show that a comparatively high percentage of people are dependent upon the car and other transport infrastructure to travel to work. Indeed, a report commissioned for the Harlow Regeneration Strategy states that *“the town has reached the position where much of its urban fabric and infrastructure has reached its capacity”*.²⁷⁸ The report notes the following issues in relation to Harlow transport accessibility and connectivity:
- Gibberd's vision for strategic road connections has never been realised – no Northern Radial Road was implemented as originally planned for
 - A lack of links from the south and the west compromise internal traffic circulation
 - Upgrading of routes has compromised the planned district road hierarchy and increased the resilience of private vehicle over other transport modes.
- 16.4.7 The number of killed and seriously injured casualties in Harlow has been below the target line and remains one of the lowest in Essex. Speeding and drink driving also remain low for the area, however; 2007 saw an increase in motorcycle casualties.²⁷⁹
- 16.4.8 In 2007/08, a submission was made for future upgrading of the A414 from the junction with M11 funded from the Community Infrastructure Fund (£9.6m). Phase two of the Harlow First Avenue bus lane £3.4m was also submitted and proposals are being developed for a mass transit system to exploit Harlow's location of West Anglia Mainline.²⁸⁰

Are there any evidence gaps?

- 16.4.9 No existing evidence gaps have been identified.

²⁷⁷ ONS Harlow – KS15 Travel to Work (last updated 02 June 2006) [online] available at: <http://neighbourhood.statistics.gov.uk> (accessed 7 September 2009).

²⁷⁸ PACEC and Halcrow Group Limited (2005) *Harlow Regeneration Strategy – Final Report* [online] available at: http://www.harlow.gov.uk/about_the_council/council_services/business_services/regeneration_unit/harlow_regeneration_strategy.asp (accessed 7 September 2009).

²⁷⁹ Harlow 2020 Partnership (2008) *Harlow 2020 Vision – Key achievements 2007-08* [online] available at: http://www.harlow2020.org.uk/downloads/key_achievements/harlow_2020_report.pdf (accessed 7 September 2009).

²⁸⁰ Harlow Council (2008) *Harlow District Council Annual Monitoring Report 2007-08* [online] available at: <http://www.harlow.gov.uk/pdf/Annual%20Monitoring%20Report%202007-2008.pdf> (accessed 7 September 2009).

16.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 16.5.1 Harlow former New Town's infrastructure was built for a New Town population of 60,000 people that has since been superseded, and travel choices have changed and people have generally become more travel dependent and reliant on the private car. The existing transport infrastructure is currently under great pressure and is in need of updating. Without the plan this situation is likely to worsen and will be more difficult to address.

16.6 What issues should be a particular focus for the appraisal?

- 16.6.1 In light of the information above, key issues to take into account in the appraisal in relation to transport include:
- Harlow is part of a key transport corridor, is a regional transport node and is part of the Harlow and Stansted / M11 Corridor strategy area for Essex – in terms of transport, it is strategically very well located with further potential and benefit for the District
 - The current transport infrastructure is under strain, existing strategic transport linkages are currently inadequate and compromise the original town vision for transport and connectivity
 - The District has a low percentage of home workers and a high percentage of travellers to work. A more sustainable modal shift is required so that levels of private car use for commuting are reduced.

17 Water

17.1 Introduction

- 17.1.1 Water quality is assessed by the percentage of river length that has good chemical and ecological status. Ecological status, in turn, is defined as a combination of physico-chemical elements (e.g. nutrients, pH, and dissolved oxygen), biological elements (e.g. fish, algae), specific pollutants and hydromorphology (e.g. depth, width, flow).
- 17.1.2 Poor water quality is typically due to a combination of agricultural runoff, untreated drainage from built-up areas and roads, and discharge from wastewater treatment works. It can affect people's health, and that of plants and animals.
- 17.1.3 The pressures on our water resources are growing. More houses are being built, our population is increasing and we are all using more water. Climate change will only add to these pressures. UK-wide, roughly 48% of the water abstracted in England and Wales is for household use, 22% for non-domestic use, and 22% is lost due to leakage²⁸¹.

17.2 What's the policy context?

- 17.2.1 The EU Water Framework Directive (WFD)²⁸² requires all inland and coastal waters to achieve at least 'good status' by 2015 or, where this is not possible, by 2021 or 2027. The Environment Agency has prepared draft River Basin Management Plans²⁸³ that show how these requirements will be met by 2025. This includes a final plan for the Thames River Basin District which covers Harlow District and was published in December 2009. According to the Environment Agency, the EU WFD is likely to result in revised consenting measures and therefore could have an impact on the capacity of Sewage Treatment Works (STWs) to discharge to local watercourses²⁸⁴.
- 17.2.2 Ongoing actions with relevance to LPAs include influencing the location of development, developing specific policies for contaminated land, and to comply with published advice (SUDS Code of Practice) for operators on sustainable drainage systems (SUDS) (this is voluntary or optional but driven by the Groundwater Directive). In addition, a number of actions may be taken by the Environment Agency post 2015 and therefore should be considered by the Plan to ensure that it is flexible enough. These actions relevant to LPAs include²⁸⁵:
- Influencing local government policies to ensure building regulations adopt high standards of water efficiency;
 - Seeking inclusion of water efficiency measures and targets with Regional Spatial Strategies and Local Development Framework documents;

²⁸¹ Environment Agency (2007) *Water supply in England and Wales 2000 to 2007* [online] available at:

<http://publications.environment-agency.gov.uk/pdf/GEHO0907BMXP-e-e.pdf?lang=e> (accessed 29 June 2009).

²⁸² European Union (2000) *EU Water Framework Directive* [online] available at: http://ec.europa.eu/environment/water/water-framework/index_en.html (accessed 29 June 2009).

²⁸³ Environment Agency (2008) *Draft River Basin Management Plans* [online] available at: <http://www.environment-agency.gov.uk/research/planning/33106.aspx> (accessed 29 June 2009).

²⁸⁴ See Appendix 1.

²⁸⁵ Environment Agency (2009) *Water for life and livelihoods: annex C – actions to deliver objectives*.

- Ensure the need for appropriate Water Cycle Strategies are included in regional and local plans, particularly in growth or high risk areas;
 - Influence developers and LPA on implications of WFD during preparation of development briefs for major developments;
 - Provide national guidance for spatial planners on integrating development planning and water planning;
 - RSSs to include policy ensuring the delivery of WFD requirements through planning/LDF process
 - Influence the LPA on enforcement of National, Regional and Local Planning Policy relating to pollution prevention, SUDS, land and groundwater contamination and ecological enhancement. Strengthen policy through regular review; and
 - Identify suitable development for high risk areas in this groundwater sensitive area with thin soils over Chalk and fairly rapid fissure flow.
- 17.2.3 Future Water: The Government's water strategy for England (2008)²⁸⁶ sets out the Government's vision for how the water sector will look by 2030 and some of the steps necessary to achieve it. The Strategy requires planning authorities to work closely with the water companies and the Environment Agency on timing and numbers of new households in areas likely to see the greatest growth. The CLG/Defra's report 'Water efficiency in new buildings'²⁸⁷ outlines policies and measures that aim to reduce domestic consumption in new properties to 125 litres per head per day (l/hd/d) through the introduction of new building regulations. Government has also consulted on amending the Building Regulations to include minimum water efficiency standards for new homes²⁸⁸, and will review the Water Supply (Water Fittings) Regulations 1999 later in 2009. However there is uncertainty about when these will be agreed, and associated implementation put in place.
- 17.2.4 The Code for Sustainable Homes²⁸⁹ outlines various target levels for the construction of sustainable homes, one aspect of which is the efficient use of water. From 2010, all affordable housing will have to be constructed to Code Level 3, which sets water consumption at 105 l/p/d for internal use for an average year.
- 17.2.5 The Environment Agency is developing Catchment Abstraction Management Strategies (CAMS)²⁹⁰ which consider how much water can be abstracted from watercourses without damaging the environment within a catchment – the most appropriate scale for planning for water. They recognise the needs of abstractors whilst also fitting in with the requirements of the Water Framework Directive. The Environment Agency is also carrying out research into environmental limits and how they relate to infrastructure provision. Harlow is within the area of the Thames region CAMS and the current published CAMS for Harlow is the Upper Lee CAMS which sets out the following strategy:

²⁸⁶ Defra (2008) *Future Water: The Government's water strategy for England* [online] available at: <http://www.defra.gov.uk/environment/water/strategy/pdf/future-water.pdf> (accessed 22 July 2009).

²⁸⁷ CLG / Defra (2007) *Water efficiency in new buildings* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/WaterEfficiencyNewBuildings.pdf> (accessed 29 June 2009).

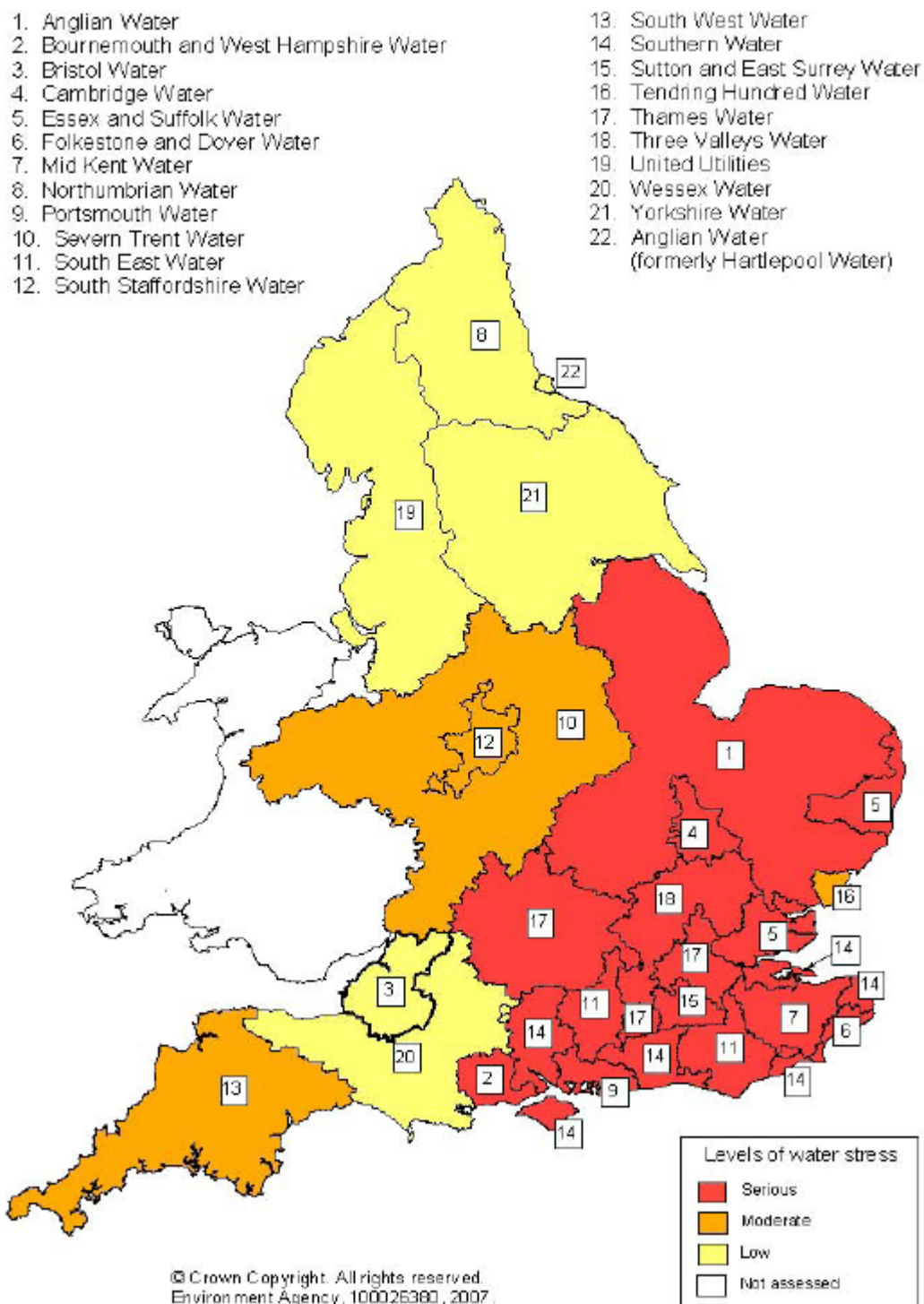
²⁸⁸ CLG (2008) *The Building Act 1984, The Building Regulations 2000. Proposals for amending Part G (Hygiene) of the Building Regulations and Approved Document G: Consultation* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/partgconsultation> (accessed 29 June 2009).

²⁸⁹ CLG (2006) *Code for Sustainable Homes: a step-change in sustainable home building practice* [online] available at: http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf (accessed 29 June 2009).

²⁹⁰ For more information on catchment abstraction management strategies see: <http://www.environment-agency.gov.uk/research/planning/33372.aspx> (accessed 29 June 2009).

- Surface water – No further consumptive licences for the River Mimram and Upper Stort; Licenses only considered at times of very high flow on the Rivers Lee, Beane, Rib, Ash and Lower Stort; Seek to reduce abstractions through the licensing policy, through the Restoring Sustainable Abstraction programme, revoking unused licenses and promoting water efficiency.
 - Groundwater – No further consumptive licenses from the Upper Lee; Continue to encourage all present and future abstractors to employ water-efficient measures; Use the principle of reasonable need when determining licences.
- 17.2.6 The Environment Agency's view on water metering is that the majority of homes in water stressed areas should be metered by 2015. Harlow is currently considered to be under serious water stress as shown in Figure 22.

Figure 22: Areas of water stress²⁹¹



²⁹¹ Source: Environment Agency (2008) *Areas of water stress: final classification* [online] available at: <http://publications.environment-agency.gov.uk/pdf/GEHO1207BNOC-e-e.pdf> (accessed 17 August 2009).

17.2.7 The East of England Plan contains several specific policies to manage water resources within the Region. These include **Policy WAT1: Water Efficiency** which aims to reduce per capita consumption rates and advocates a ‘twin track’ approach to meeting the increasing demand for water in the region. In this demand management and resource development plans are both progressed and supported by additional policies. **Policy WAT2: Water Infrastructure** advises that LDDs should plan to site new development so as to maximise the potential of existing water/waste water treatment infrastructure and minimise the need for new /improved infrastructure. Supportive text for this policy states that a particular challenge for certain parts of the region will be to reconcile growth ambitions with environmental limits. This is the case for the Rye Meads STW catchment area which includes Harlow. Here a strategic review of the options is required which look beyond incremental expansion to new facilities or other possible works to cope with restrictions at Rye Meads. **Policy WAT3: Integrated Water Management** states that LPAs should work with partners to ensure their plans, policies, programmes and proposals take account of relevant water-related plans, studies, and sites of European importance for wildlife.

17.2.8 The Rye Meads Water Cycle Strategy was undertaken in response to the RSS and published in December 2009. This study includes the Rye Meads Wastewater Treatment Works (WwTW) catchment and any surrounding areas that could potentially be pumped to it, taking into account concerns that existing water infrastructure in the area may not have the capacity to handle (or current investment plans do not make provision for) the increased demands from new development proposed in the Plan. It provides an evidence base for the local authorities to ensure that they comply with policy H1 of the RSS. The Strategy found that predicted increases in efficiency and the work already being proposed by the water companies in the study area means that strategic water infrastructure should not constrain the growth proposed up to 2021. However, owing to long-term (post 2021) uncertainties, the study recommends a framework for the completion of further work in parallel with local authority LDF preparation to ensure growth is not constrained in the long term due to water infrastructure and environmental capacity constraints.²⁹²

17.3 What are the key objectives and other decision-making criteria that we need to consider?

17.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 – are relevant in considering future impacts on Harlow’s town centre. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Adapt to the impacts of climate change
- Increase resource efficiency and reduce resource use and waste
- Conserve, restore and enhance the region’s natural and built environment
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

²⁹² Hyder Consulting (UK) Limited (2009) *Rye Meads Water Cycle Strategy 2009* [online] available at: <http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/rye%20meads%20water%20cycle%20strategy.aspx> (accessed 1 February 2010).

- Promoting a clean, green, healthy and safe environment
- Providing value for money.

17.4.1 Harlow District is located within the Thames River Basin District (see Figure 23) and the Thames River Catchment Area.²⁹⁴ The River Stort is a main river in the region and runs east-west on the north boundary of Harlow District.

[illegible]

²⁹⁵ Environment Agency (2008) *River Basin Management Plan for the Thames River Basin District* [online] available at: <http://wfdconsultation.environment.gov.uk/wfdcms/en/thames/Intro.aspx> (accessed 17 August 2009).

aquifer. However, current assessments show that groundwater is fully utilised over much of the Thames River Basin District.²⁹⁶ Harlow is located in area designated as 'serious water stress'.²⁹⁷ The Environment Agency has prepared a Catchment Abstraction Management Strategy for the Upper Lee – an area incorporating the River Stort and the urban area of Harlow.²⁹⁸

- 17.4.3 Public water supply is provided by Veolia Water Central Limited (previously known as Three Valleys Water) and sewerage is supplied by Thames Water. Responsibility for planning and managing water supply in Harlow falls within the Three Valleys Water Northern Resource Zone.²⁹⁹ Harlow District drinking water is sourced from groundwater in the Thames region. The drinking water for the District has been tested and assessed as being of 'good quality', with overall compliance with drinking water standards at the consumers' taps at 99.98% in 2007 and 2008. However, consumer contact rates per 1,000 population for 'discoloured' water (brown, black or orange water), are highest for the region in the area around and including Harlow (see Figure 24). Veolia Water Central Limited is planning improvements to the Roydon treatment works to improve this situation.³⁰⁰

Figure 24: Consumer contact rates per 1,000 population for 'discoloured' water³⁰¹

²⁹⁶ Environment Agency (2008) *River Basin Management Plan for the Thames River Basin District* [online] available at: <http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/thames/Intro.aspx> (accessed 17 August 2009).

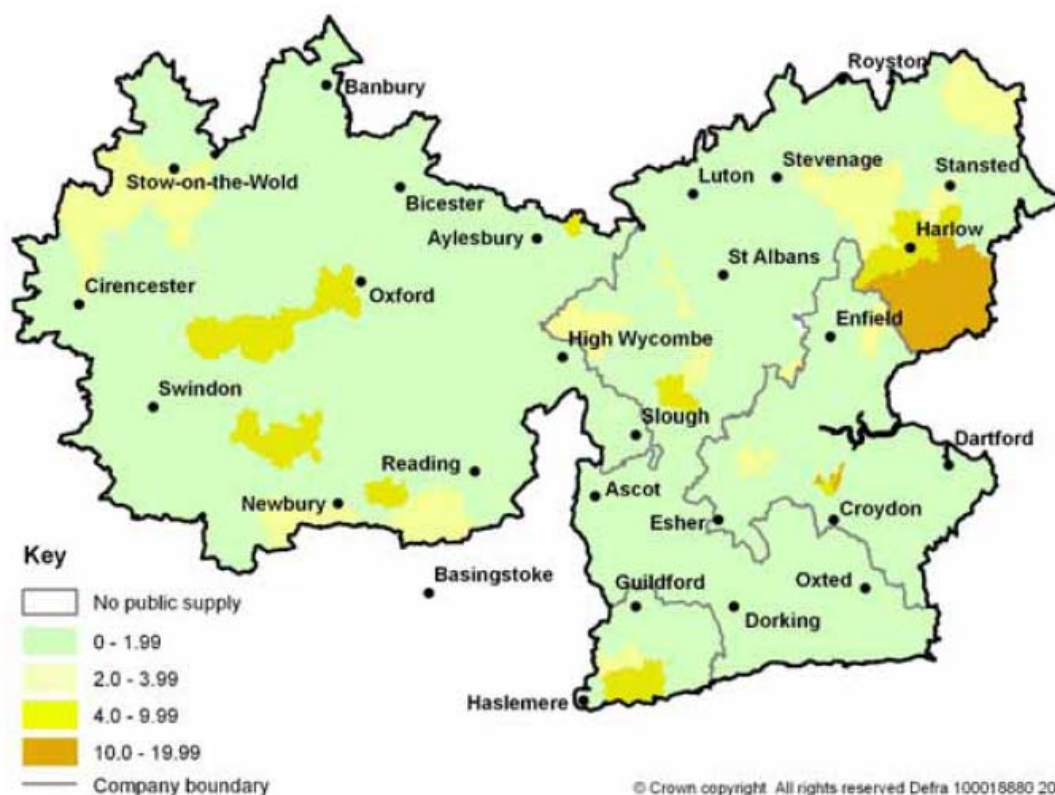
²⁹⁷ Environment Agency (2008) *Areas of water stress: final classification* [online] available at: <http://publications.environment-agency.gov.uk/pdf/GEHO1207BNOC-e-e.pdf> (accessed 17 August 2009).

²⁹⁸ Environment Agency (2006) *Upper Lee CAMS* [online] available at: <http://www.environment-agency.gov.uk/research/planning/33420.aspx> (accessed 17 August 2009).

²⁹⁹ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 17 August 2009).

³⁰⁰ Drinking Water Inspectorate (2008) *Drinking water 2008: Thames region* [online] available at: <http://www.dwi.gov.uk/pubs/annrep08/CIR%2008%20Thames%20Region.pdf> (accessed 17 August 2009).

³⁰¹ Source: Drinking Water Inspectorate (2008) *Drinking water 2008: Thames region* [online] available at: <http://www.dwi.gov.uk/pubs/annrep08/CIR%2008%20Thames%20Region.pdf> (accessed 17 August 2009).



- 17.4.4 Within Harlow the daily domestic water use (per capita consumption, litres) was 181 litres in 2004. This is significantly higher than the national average of 154 litres for that year³⁰² and the sustainable level of consumption advised by the Environment Agency as being 110 litres.
- 17.4.5 The percentage of river length assessed as good biological quality and as good chemical quality was annually assessed as 100% for the period 2002-2005 and is higher than for the District's geographical neighbours.³⁰³ The Environment Agency, however, assessed the waterbodies in the Harlow District as being of moderate ecological quality and has not assessed chemical quality.³⁰⁴ The condition of rivers in the Upper Lee CAMS area have been affected (e.g. flow regime and quality) by factors including: urban run-off; low flows; industrial activity; public water supply abstractions; sewage treatment works discharges; and flood and drought conditions. Ground Water resource availability status for Harlow in this catchment area were assessed as being over abstracted and the water resource management units as over-licensed.³⁰⁵
- 17.4.6 Table 24 shows the percentages of metered properties in the area covered by Veolia Water Central Limited for the period 2000-2007. This percentage has steadily increased and, although historically lower than the England and Wales averages, in 2006/07 it rose above the

³⁰² Audit Commission (2009). *Area profile – Harlow* [online] available at: <http://www.areaprofiles.audit-commission.gov.uk> (accessed 14 August 2009).

³⁰³ Audit Commission (2009). *Area profile – Harlow* [online] available at: <http://www.areaprofiles.audit-commission.gov.uk> (accessed 14 August 2009).

³⁰⁴ See: Environment Agency: *Water Framework Directive – River Basin Management Plans – Rivers* [online] available at: <http://maps.environment-agency.gov.uk> (accessed 14 August 2009).

³⁰⁵ Environment Agency (2006) *Upper Lee CAMS* [online] available at: <http://www.environment-agency.gov.uk/research/planning/33420.aspx> (accessed 17 August 2009).

England and Wales average for the first time. However, it is still far from achieving the 2015 Environment Agency's aspiration for universal water metering in water scarce areas.

Table 24: Household metering (percentage)³⁰⁶

	1999/00	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07
Veolia Water Central Limited	13	15	16	18	21	23	26	30
England & Wales total	17	18	20	22	23	25	27	29

- 17.4.7 Harlow falls within the catchment of the Rye Meads WwTW. The Rye Meads Water Cycle Strategy did not identify any 'overwhelming' technical constraints to planned growth until 2021. Previous scoping work identified that water resources in the study area are either over-abstracted or over-licensed; that rivers within the upper reaches of the catchment are suffering from low flows with adverse impacts upon ecology; that consumers in the study area have the highest per capita consumption rates in England and Wales; a threat of pollution if sewerage capacity is not addressed; and that the majority of rivers within the study area are compliant (2003-2005) with EA quality targets despite excessively high nutrient levels in places.
- 17.4.8 The study identifies the importance of adopting the Code for Sustainable Homes water efficiency targets in new dwellings of 105l/p/d and aiming for Defra's aspirational target of 130 l/p/d by 2030 in existing dwellings. This could result in water neutrality. The sewerage network is known to be close to capacity in certain areas which increases the risk of flooding from sewers, particularly during storm events; and major strategic sewerage upgrade is anticipated for Harlow. SuDS and other surface water drainage methods will be a particularly important consideration for development, because the report highlights that water drainage from new developments should not enter the existing foul sewerage network as it increases the risk of sewer flooding and also pollution risk.³⁰⁷
- 17.4.9 It is anticipated that Rye Meads WwTW should be able to operate within its existing volumetric discharge consent limit past 2021 for wastewater, but that upgrades will be needed to ensure the required chemical and biological standards of the discharged effluent are met and to ensure that the adjacent Rye Meads nature reserve and the Lee Valley Special Protection Area are not significantly affected. The report considers that water quality will not constrain development in the short-medium term, as the Rye Meads WwTW can continue to operate within its current physio-chemical discharge consent limits; although consideration will be needed for the period post-2021. The study notes that a number of schemes to enhance water biodiversity in the catchment area have been carried out, and that SUDS and wastewater treatment solutions will require careful consideration. It notes that there are no environmental 'show-stoppers' to the study recommendations for development of the WwTW for the period until 2021.³⁰⁸

³⁰⁶ Environment Agency (2007) *Water supply in England and Wales 2000 to 2007* [online] available at: <http://publications.environment-agency.gov.uk/pdf/GEHO0907BMXP-e-e.pdf?lang=e> (accessed 14 August 2009).

³⁰⁷ Hyder Consulting (UK) Limited (2009) *Rye Meads Water Cycle Strategy 2009* [online] available at: <http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/rye%20meads%20water%20cycle%20strategy.aspx> (accessed 1 February 2010).

³⁰⁸ Hyder Consulting (UK) Limited (2009) *Rye Meads Water Cycle Strategy 2009* [online] available at: <http://www.harlow.gov.uk/about%20the%20council/council%20services/environment/planning/local%20development%20framework/rye%20meads%20water%20cycle%20strategy.aspx> (accessed 1 February 2010).

Are there any evidence gaps?

- 17.4.10 Clarification of actual watercourse ecological and chemical quality is needed.

17.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 17.5.1 Without the plan, key ambitions within RSS policies may not be achieved including locating new development so as to maximise the potential for existing water/waste water treatment infrastructure.
- 17.5.2 Without intervention of the Core Strategy many of the government targets with respect to water efficiency may not be realised. This is an issue of serious concern given the problem of water stress and the high levels of growth to be provided in the Harlow Area. Combined with the predicted effects of climate change, water quality and quantity would be likely to be adversely affected by new development, particularly in the absence of a plan that sets out the appropriate distribution and phasing of development to take into account infrastructure and environmental constraints.
- 17.5.3 Without the plan process there would not be the opportunity for the strategic interventions by the Environment Agency to ensure that the requirements of the Water Framework Directive are met.

17.6 What issues should be a particular focus for the appraisal?

- 17.6.1 In light of the information above, key issues to take into account in the appraisal in relation to water quality and resources include:
- Harlow is located in an area of serious water stress, which will be exacerbated due to climate change and future growth and development
 - The need to maintain and improve the water quality of Harlow's water courses in line with the Water Framework Directive requirements
 - The need to ensure distribution and location of new development takes the water supply and sewerage infrastructure into account
 - The need to reduce per capita consumption of water and maintain high levels of drinking water quality
 - The need to consider Sustainable Drainage Systems (SuDS) and other water saving and water quality enhancing measures.

18 European sites

18.1 Introduction

European Court of Justice ruling

- 18.1.1 It is a requirement of 6 of the EC Habitats Directive 1992 and Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended) (Box 3) that 'land use plans' (including local authority Local Development Frameworks) are subject to an 'Appropriate Assessment' (AA) if it is likely that they will lead to significant adverse effects on a Natura 2000 site (Special Areas of Conservation, SACs, and Special Protection Areas, SPAs). As a matter of UK Government policy Ramsar sites³⁰⁹, candidate Special Areas of Conservation (cSAC) and proposed Special Protection Areas (pSPA) are given equivalent status.

Box 3: The legislative basis for Appropriate Assessment

Habitats Directive 1992

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

Article 6 (3)

Conservation (Natural Habitats &c. Regulations) 1994 (as amended)

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives ... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

Regulation 48

- 18.1.2 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This is in contrast to the Strategic Environmental Assessment (SEA) Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; it simply says that the assessment findings (as documented in the 'environmental report') should be 'taken into account' during preparation of the plan or programme. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network.
- 18.1.3 As assessment of plans has developed, the term Habitats Regulations Assessment (HRA) has come into currency for describing the overall assessment process (including screening to

³⁰⁹ Wetlands of International Importance designated under the Ramsar Convention 1979

determine whether significant adverse effects are likely or not) and this term is used below when necessary to distinguish the process from the 'Appropriate Assessment' stage itself.

18.2 This report

18.2.1 This report is intended to serve three main purposes, all of which seek to define the processes and parameters of the HRA:

- To set out the methodological approach to undertaking the HRA of the Core Strategy DPD;
- To provide details of data sources that have been identified at this initial stage as being available to inform the HRA (the 'evidence base'); and
- To set out the 'scope' of the HRA (subject to agreement with Natural England) - The scope of the HRA will consist of three components:
 - **The physical scope** – the range of European sites that will be considered within the assessment.
 - **The policy scope** – the aspects of the Core Strategy that will need to be subject to HRA.
 - **The 'in combination' scope** – the range of other plans and projects that need to be considered 'in combination' with the Core Strategy. In practice, 'in combination assessment' is of greatest importance when the Core Strategy would otherwise be dismissed because the individual contribution is inconsequential.

18.2.2 This report is particularly intended to stimulate discussion over the scope and we would be very interested in the comments of Natural England concerning the data sources identified and the 'other plans and projects' to be considered in combination with the Core Strategy DPD.

18.3 Proposed methodology

Principles

18.3.1 Scott Wilson has adhered to several key principles in developing the methodology – see Table 25.

Table 25: Key principles underpinning the proposed methodology

Principle	Rationale
Use existing information	We will use existing information to inform the assessment. This will include information gathered as part of the SA of the emerging Local Development Framework and information held by Natural England, the Environment Agency and others.
Consult with Natural England, the Environment Agency and other stakeholders	We will ensure continued consultation with Natural England and the Environment Agency for the duration of the assessment. We will ensure that we utilise information held by them and others and take on board their comments on the assessment process and findings.
Ensure a proportionate assessment	We will ensure that the level of detail addressed in the assessment reflects the level of detail in the Core Strategy (i.e. that the assessment is proportionate). With this in mind, the assessment will focus on information and impacts considered appropriate to the local

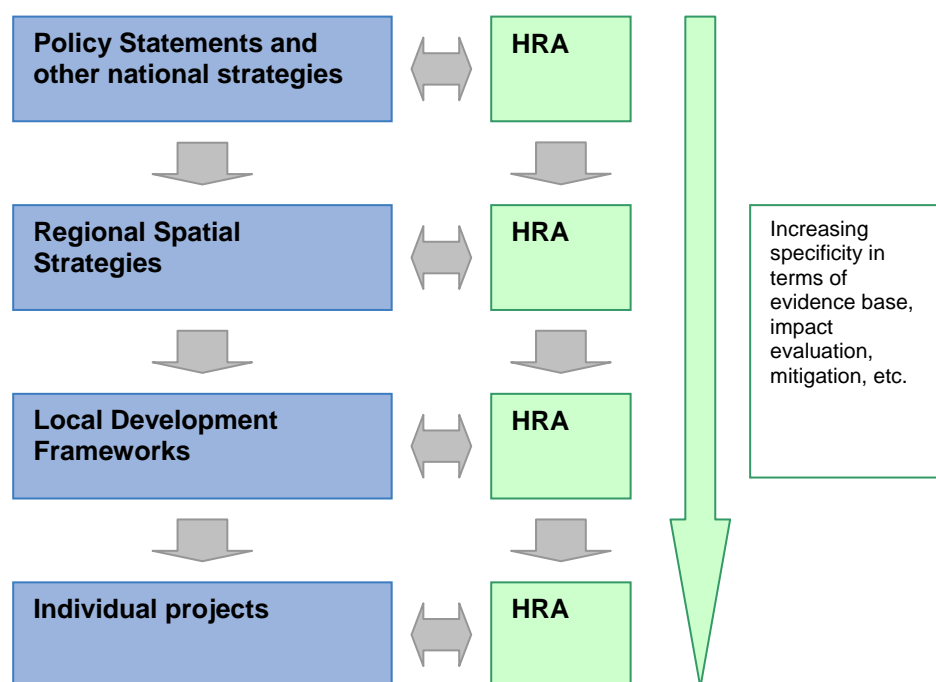
Principle	Rationale
	level.
Keep the process simple as possible	We will endeavour to keep the process as simple as possible while ensuring an objective and rigorous assessment in compliance with the Habitats Directive and emerging best practice.
Ensure a clear audit trail	We will ensure that the AA process and findings are clearly documented in order to ensure a clearly discernible audit trail.
Agree presentational format	We will agree the style of presentation early in the process, considering the audience for the work.
Flexibility	We will maintain a watching brief on all changes to HRA guidance from CLG and Natural England as well as advances in HRA best practice, in order to ensure that we provide the client with the best advice possible.

18.4 A Proportionate Assessment

- 18.4.1 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of adverse effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 18.4.2 However, the draft CLG guidance³¹⁰ makes it clear that when implementing HRA of land-use plans, the AA should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 18.4.3 *“The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.”*
- 18.4.4 In other words, there is a tacit acceptance that appropriate assessment can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers (Figure 25).
- 18.4.5 For an LDF the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning the design of the town, including layout of greenspace and type of development to be delivered in particular locations, yet these data will not be decided until subsequent stages.
- 18.4.6 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt; it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon a European site unless it can be clearly established otherwise.

³¹⁰ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

Figure 25: Tiering in HRA of Land Use Plans

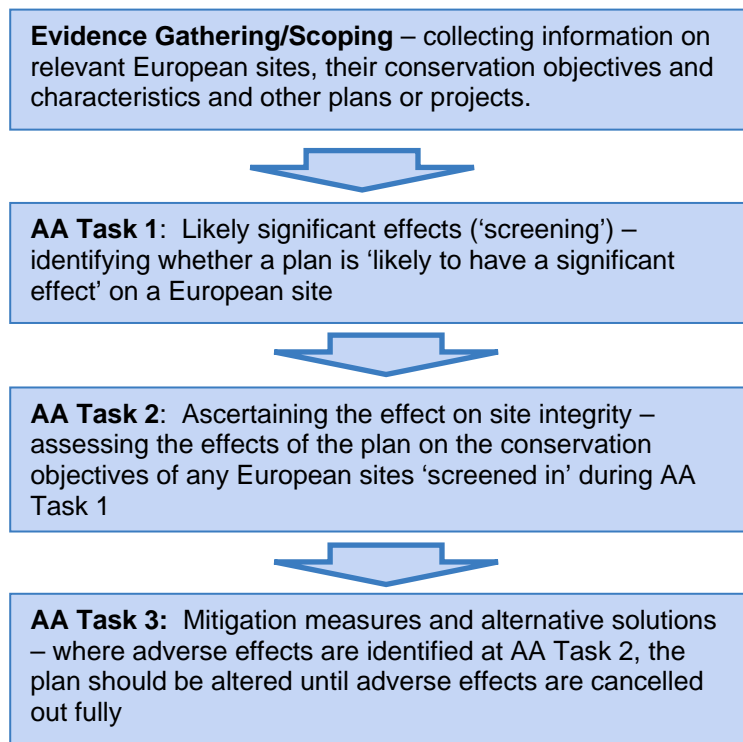


The Process of HRA

- 18.4.7 The HRA is likely to be carried out in the continuing absence of formal Government guidance. CLG released a consultation paper on AA of Plans in 2006³¹¹. As yet, no further formal guidance has emerged.
- 18.4.8 Figure 26 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

³¹¹ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

Figure 26: Four-Stage Approach to Habitat Regulations Assessment



18.4.9 In practice, we and other practitioners have discovered that this broad outline requires some amendment in order to feed into a developing land use plan such as a Core Strategy.

18.4.10 The Evidence Gathering stage is the purpose of the remainder of this document.

18.5 The Scope of the HRA

Introduction

18.5.1 The scope of the HRA has been divided for simplicity into three components. The purpose of this section is to define that scope as far as possible at this stage. We would be interested to receive Natural England's view on the various issues of scope that we raise below.

The physical scope

18.5.2 This defines the range of European sites that will be considered within the assessment. The following are typical of the issues that have to be considered during Appropriate Assessment of spatial development policies (see Table 26).

Table 26: Possible impacts of Local Development Frameworks in Harlow upon European sites

Impact	Comment
Landtake	<ul style="list-style-type: none"> • May cause fragmentation as well as habitat loss. • Land outside European site boundaries may be important for the integrity of the site (e.g. areas outside SPAs that are used by roosting or feeding birds) e.g. around the Lee Valley
Hydrology	<ul style="list-style-type: none"> • Demand for water could result in drawdown of water levels within the Lee Valley. • Development may have hydrological consequences, affecting surface water and/or groundwater flows upon which wetland sites are dependent.
Water quality	<ul style="list-style-type: none"> • Sewage treatment effluent (e.g. pressure on capacity at Rye Meads STW) • Effluent from industrial processes. • Polluted run-off from car parking areas and roads.
Air quality	<ul style="list-style-type: none"> • Industrial emissions. • Domestic heating. • Traffic
Recreational pressure	<ul style="list-style-type: none"> • Disturbance to sensitive species. • Trampling and erosion of sensitive habitats e.g. dunes • Eutrophication from dogs.
Other 'proximity effects' of urbanisation	<ul style="list-style-type: none"> • Introduction of invasive alien species, mainly from tipping of garden waste. • Increased risk of arson. • Effects on behaviour from lighting. • Noise disturbance. • Cat predation

18.5.3 From our knowledge of the Harlow area and the impact pathways identified above, it is our view that the physical scope of the HRA (at least at Screening) would be as follows in Table 27:

Table 27: Physical scope of the HRA

European site	Conceivable pathways identified at this initial stage that may connect European sites to Harlow
Epping Forest SAC	<ul style="list-style-type: none"> Increased population levels could lead to possible recreational pressure causing damage to sensitive habitats. Increased population levels in Harlow could lead to increased traffic levels on the M25 and thus reduced air quality at Epping Forest SAC.
Lee Valley SPA and Ramsar site	<ul style="list-style-type: none"> Increased population levels could lead to possible recreational pressure causing disturbance of bird interest. Possible water quality issues through pressure on STW capacity and through run-off. Possible hydrological issues through increased demand for water.
Wormley-Hoddesdonpark Woods SAC	<ul style="list-style-type: none"> Increased population levels could lead to possible recreational pressure causing damage to nature conservation interest. Possible risk from effects normally associated with urbanisation – i.e. fly-tipping.

18.5.4 Further details regarding the interest features and vulnerabilities of the European sites included within the scope of the HRA are given below.

Epping Forest SAC

18.5.5 Epping Forest SAC is located approximately 5km south of Harlow district. 70% of the 1,600 hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Reasons for Designation

18.5.6 Epping Forest qualifies as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of:

- Beech forests on acid soils: an example of such habitat toward the north-east of its UK range, containing a notable selection of bryophytes, fungi and dead-wood invertebrates;
- Wet heathland with cross-leaved heath; and
- Dry heath

18.5.7 Secondly, the site contains the Habitats Directive Annex II species Stagbeetle *Lucanus cervus*, with widespread and frequent records.

Historic Trends and Current Pressures

18.5.8 Much of the value of Epping Forest stems from a long history of pollarding, and although this ceased at the end of the 19th century, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995. This helped to reverse the decline of the forest's epiphytic bryophyte population. The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act.

- 18.5.9 There is an active policy to leave felled timber on the ground to increase the habitat for stag beetle and other saproxylic insects. This is one of four outstanding localities for the beetle in the UK, and it is reliant on felled timber for development of its larvae, a process that takes several years.
- 18.5.10 In 1988, the Corporation of London, who own and manage the forest, agreed a management strategy with English Nature (now Natural England) to take forward the management. A comprehensive management plan was completed and consented in 1998. The site is subject to the provisions of the Epping Forest Act of 1878.
- 18.5.11 Deteriorating air quality and under-grazing are the two key pressures that currently affect the site.

Table 28: Critical nitrogen loads, actual rates of nitrogen deposition, NOx concentrations³¹² and sulphur dioxide concentrations for Epping Forest SAC. Red shading indicates exceedance of thresholds

Site	Grid reference	Most nitrogen sensitive habitat	Minimum ³¹³ critical loads (Kg N/ha/yr)	Actual nitrogen deposition ³¹⁴ (Kg N/ha/yr)	Actual NOx concentration (µgm ⁻³)	Actual SO ₂ concentration (µgm ⁻³)
Epping Forest SAC	TQ425985	Beech woodland	10	36.4	30	3.7

- 18.5.12 It is clear from Table 28 that nitrogen deposition is already a problem within Epping Forest SAC. According to the APIS website, fully 20% of nitrogen currently deposited within Epping Forest derives from road transport exhaust emissions.
- 18.5.13 While recreational pressure is a considerable impact in some areas, these are localised; however, funding of management on the SAC is governed largely by donation and contributions from the Corporation of London and it is likely that the ability to adequately manage recreation on the SAC will come under increasing pressure as the population of northeast London, Epping Forest and east Hertfordshire increases.
- 18.5.14 The environmental requirements of Epping Forest SAC are mainly:
- The need to continue to manage recreational access so as to minimise damage to the important habitats present.
 - The need to counter negative changes to low-nutrient habitats resulting from atmospheric nutrient deposition. The site is adjacent to the busy M25 and is bisected by numerous 'rat runs.'
 - The need to provide optimal grazing input to manage heathland and grassland habitats.
 - The need to avoid water pollution
 - The need to avoid introduction of non-native species.

³¹² Calculated as NO₂

³¹³ APIS provides a critical load range – on a precautionary basis, this assessment uses the lowest figure in that range

³¹⁴ To a resolution of 5 km

Lee Valley SPA and Ramsar

- 18.5.15 The Lee Valley comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24 km of the valley. These waterbodies support internationally important numbers of wintering gadwall and shoveler, while the reedbeds support a small but internationally important population of bittern. In addition to the ornithological interest, the site also qualifies as a Ramsar site on account on rare and scarce plants and invertebrates present.
- 18.5.16 The Lee Valley SPA/Ramsar consists of four Sites of Special Scientific Interest, of which Turnford and Cheshunt Pits SSSI, Rye Meads SSSI and Amwell Quarry SSSI all lie on the Hertfordshire/Essex border. Walthamstow Reservoirs SSSI lies within London Borough of Waltham Forest. The Special Protection Area is managed by the Lee Valley Regional Park Authority and by Thames Water.

Reasons for Designation

- 18.5.17 The Lee Valley site is designated as an SPA and Ramsar for its Birds Directive Annex I species that over-winter, and these are³¹⁵:
- Bittern *Botaurus stellaris*: 6 individuals = 6% of the wintering population in Great Britain;
 - Gadwall *Anas strepera*: 445 individuals = 2.6% of the wintering population in Great Britain; and
 - Shoveler *Anas clypeata*: 287 individuals = 1.9% of the wintering population in Great Britain.
- 18.5.18 In addition, the site qualifies as a Ramsar under criterion 2 (UN, 2005), by supporting the nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Historic Trends and Current Pressures

- 18.5.19 The Lee Valley is vulnerable to eutrophic water quality; but this is being addressed via AMP4 funding under the Urban Waste Water Treatment Directive and a Water Cycle Study.
- 18.5.20 The other main threat is that of human recreational pressure, although this is regulated through zoning of water bodies within the Lee Valley Regional Park. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority.
- 18.5.21 There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought.
- 18.5.22 Presently, the SPA/Ramsar remains in favourable condition.
- 18.5.23 The environmental requirements of Lee Valley SPA/Ramsar are mainly:
- The need to control recreational impacts so as to avoid bird disturbance.
 - Maintenance of appropriate vegetation management through grazing, mowing and other relevant techniques.

³¹⁵ All bird count data in this document is sourced from the SPA Review site accounts as available on the Joint Nature Conservation Committee website www.jncc.gov.uk/page-1412

- Continued inputs of freshwater at appropriate flow volumes
- The need to avoid further eutrophication of water bodies within the SPA/Ramsar, and to avoid any other pollution events.
- The need to avoid introduction of non-native species.
- The need to provide suitable habitat outside the boundaries of the designated area that can be utilised by key species as supporting habitats.

Wormley-Hoddesdonpark Woods SAC

- 18.5.24 This SAC consists of two SSSIs – Wormley-Hoddesdonpark Woods North and Wormley-Hoddesdonpark Woods South and is situated approximately 5km to the west of Harlow. The semi-natural woodland is of national importance as an example of lowland south-east sessile oak/hornbeam type with the pedunculate oak/hornbeam variant also present. Additionally, small ponds and streams are important habitats for bryophytes.

Reasons for Designation

- 18.5.25 Wormley-Hoddesdonpark Woods qualifies as a SAC through its habitats, containing the Habitats Directive Annex I habitat:
- Oak-hornbeam forests – this is one of only two outstanding locations for such habitat in the UK.

Historic Trends and Current Pressures

- 18.5.26 The majority of the woods in the complex are in sympathetic ownership, with no direct threat (Hoddesdon Park Wood for example, is managed by the Woodland Trust). There is some pressure from informal recreation, and there has been limited damage in the past (for example from four-wheel drive vehicles). However, most recreation is concentrated on well-established paths. Most of the complex is covered by a High Forest Zone Plan (Hertfordshire County Council 1996) which sets out a framework for woodland management across the whole area. It aims to restore a varied age structure and natural stand types through sustainable forestry.
- 18.5.27 There have been some instances of fly-tipping in the recent past, and this does increase the risk on non-native species, such as cherry laurel and privet from garden waste. Coupled with instances of car dumping, this does indicate that the site attracts some urbanisation pressures.
- 18.5.28 The environmental requirements of Wormley-Hoddesdonpark Woods SAC are mainly:
- The need to minimise impacts from vandalism arson, fly-tipping and dumping, and coupled with this, to avoid introduction of non-native species.
 - The need to ensure that recreational levels do not lead to excessive trampling of ground flora, or increased nutrient levels through dog fouling.
 - The need to ensure continued hydrological balance on the site with high-quality streams running eastward along the shallow valleys (Wormleybury Brook and Spital Brook), and several ponds.
 - The need to avoid negative changes to habitats resulting from atmospheric nutrient deposition.

18.6 Principal Other Plans and Projects

- 18.6.1 It is neither practical nor necessary to assess the ‘in combination’ effects of the Core Strategy within the context of all other plans and projects within Hertfordshire and west Essex. In practice therefore, in combination assessment is only really of relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing and commercial/industrial allocations proposed for other Hertfordshire authorities over the lifetime of the Core Strategy.
- 18.6.2 The Regional Spatial Strategy for the East of England provides a good introduction to proposals for Hertfordshire as a whole, and surrounding counties. At this stage, we have identified a range of plans and projects that may act in combination with the Core Strategy.

Table 29: Housing levels to be delivered across Hertfordshire and west Essex under the East of England RSS

Local Authority	Annual housing average	Total housing from 2001 to 2021
Broxbourne	255	5,100
Dacorum	315	6,300
East Hertfordshire	1,040	20,800
Hertsmere	210	4,200
North Hertfordshire	790	15,800
St. Albans	350	7,000
Stevenage	320	6,400
Three Rivers	180	3,600
Watford	230	4,600
Welwyn Hatfield	290	5,800
Epping Forest	150	3,500
Harlow	1,010	16,000

- 18.6.3 There are other plans and projects that are often relevant to the ‘in combination’ assessment, most notably Thames Water’s Water Resource Management Plan (2008) and the Environment Agency’s London Catchment Abstraction Management Strategy. These will all be taken into account in this assessment.
- 18.6.4 The Hertfordshire Waste Development Frameworks are also of some relevance, since this may well contribute to increased vehicle movements on the road network within Harlow (and thereby contribute to air quality impacts). However, the major impact is likely to be that of housing and commercial development within the surrounding boroughs as set out in Local Development Frameworks and these have therefore been the main focus of cumulative ‘in combination’ effects with regard to this HRA. Reference will also been made to the Lee Valley Regional Park Authority Park Development Framework, although it is at an early stage of development.

18.7 Principal Data Sources

- 18.7.1 We would not propose undertaking bespoke survey or modelling for this project. In general, detailed survey/modelling is not proportionate or appropriate for a Core Strategy - the CLG draft guidance states that '*An AA [of a land use plan] need not be done in any more detail, or using more resources, than is useful for its purpose*' and that '*It would be inappropriate and impracticable to assess the effects [of a land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project*'. In other words, the level of detail in the AA should reflect the level of detail in the DPD; AA of land use plans needs to be tiered, just as the plans themselves are tiered, such that the assessment (and the baseline/modelling work that informs it) gains greater specificity as the development(s) covered by the plan gain greater detail, down to the project-level AA where site surveys and detailed modelling are clearly appropriate as impacts can be explored in their fullest detail.
- 18.7.2 The detail contained within the plan is always the main limiting factor regarding the assessment and there is little to be gained from undertaking bespoke surveys if the level of detail within the plan would prevent that additional data from informing a more detailed assessment. A Core Strategy is essentially concerned with the principles (rather than details) of development and in establishing a policy framework; the AA of the plan needs to be pitched at this same level.
- 18.7.3 The most productive assessment can be generated in defining the environmental conditions and criteria that are fundamentally important for the persistence and favourable conservation status of the interest features for which the site was designated (e.g. minimal trampling, low grazing pressure, high water quality etc). By undertaking this short exercise, it is relatively easy to then identify the vulnerabilities of the European site to development.
- 18.7.4 It is our current intention that sources of evidence that we would propose to access in order to determine the relevant pressures for this HRA will primarily consist of:
- The Sustainability Appraisal for the Core Strategy and any data collated to inform it;
 - The East of England Regional Spatial Strategy HRA (2006)
 - The East of England Regional Spatial Strategy: Proposed Changes and Further Proposed Changes HRA (2007)
 - Draft Revision to the East of England Regional Spatial Strategy: HRA Technical Report on Water Quality, Water Resources and Flooding (2007)
 - East of England Plan Review: Scoping Report for HRA (2008)
 - East of England Plan 2001-2021 (2008)
 - London Plan (2004)
 - Essex and Suffolk Water revised draft Water Resource Management Plan (January 2009);
 - Thames Water revised draft Water Resource Management Plan (2008) and Statement of response to consultation (February 2009);
 - Three Valleys Water (Veolia) revised draft Water Resource Management Plan (January 2009);
 - Upper Lee Catchment Abstraction Management Strategy (2006);
 - London Catchment Abstraction Management Strategy (2006);

- Anglian Draft River Basin Management Plan (2008);
- Thames Draft River Basin Management Plan (2008);
- A Water Cycle Study for the Rye Meads catchment is in preparation and will form a key document in the HRA evidence base.
- Local Transport Plans 2006-2011;
- Recreational activity, tourism and European site recreational catchment data – where available we will use data that exists for individual European sites but in many cases these do not exist. In such circumstances we would intend to use appropriate proxy data such as the England Leisure Day Visits Survey data in conjunction with judicious use of the precautionary principle;
- A Green Infrastructure Plan for the Harlow Area (2005);
- East Hertfordshire Parks and Open Spaces Strategy 2007-2012;
- High Forest Zone Plan – Hertfordshire CC (1996)
- Lee Valley Regional Park Authority Site management Plan 2006-2011;
- Epping Forest Management Plan 2004-2010;
- Hoddesdon Park Wood Management Plan 2006-2011;
- European Site Management and Access Management Plans where available
- Stage 3 and 4 of the Environment Agency's Review of Consents process for the European sites covered in this assessment (where available);
- The UK Air Pollution Information System (www.apis.ac.uk);
- Nature on the Map and its links to SSSI citations and the JNCC website (www.natureonthemap.org.uk); and
- The Regional Biodiversity Strategy.

18.7.5 These lists will be updated as the project proceeds but we would appreciate being notified of any additions to this list that Natural England or the steering group believes can be made at this stage.

18.8 References

Department of Transport (2004). *Transport Analysis Guidance: Regional Air Pollution*.
http://www.webtag.org.uk/webdocuments/3_Expert/3_Environment_Objective/3.3.4.htm

EC, 1979 – European Council (1979). *Council Directive of 2 April 1979 on the conservation of wild birds (79/409/EEC)*. http://europa.eu.int/eur-lex/en/consleg/pdf/1979/en_1979L0409_do_001.pdf

EC, 1992 – European Council (1992). *Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora*.
http://ec.europa.eu/environment/nature/nature_conservation/eu_nature_legislation/habitats_directive/index_en.htm

European Commission (2001). *Assessment of plans and projects significantly affecting Natura 2000 sites*.
http://europa.eu.int/comm/environment/nature/nature_conservation/eu_nature_legislation/specific_articles/art6/pdf/natura_2000_assess_en.pdf

19 Next steps

19.1 Consultation on the Scoping Report

- 19.1.1 Task A5 involved consultation on the scope of the SA. The consultation period lasted for five weeks and during this time the Statutory Consultees and others (see Appendix 1) were invited to comment on the report.
- 19.1.2 Following consultation on the Scoping Report, the comments received have been integrated into the report and are also detailed in Appendix 2. The Scoping Report can now be finalised and the next stage of the SA commence. The next stage involves identifying and evaluating the impacts of the Core Strategy and other DPDs.

19.2 SA of the Core Strategy and other DPDs

- 19.2.1 The framework and evidence base presented in the final Scoping Report will provide the basis for undertaking the SA of the Core Strategy and other DPDs. Other evidence (e.g. from studies undertaken by the Council) will also be drawn on where appropriate. However, Harlow District Council will have to update the Scoping Report at the appropriate time for subsequent DPDs and therefore undertake further consultation with the statutory consultees and others as appropriate.
- 19.2.2 In order to complete the appraisal, for each spatial area and topic we will ask:
- What will be the situation with the plan?
 - How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?
 - How can we best monitor the plan's impacts?
- 19.2.3 In this way, the Core Strategy and other DPDs will be comprehensively analysed in terms of their effects on different parts of Harlow and the full range of sustainability issues.

Appendix 1 – Draft SA Scoping Report Consultees

SEA statutory consultees

- Natural England
- The Environment Agency
- English Heritage

Other consultees	
• EERA	• Homes and Communities Agency (HCA)
• GO-East	• Harlow 2020 Partnership
• EEDA	• Harlow Renaissance
• East Herts. D.C	• West Essex PCT
• Epping Forest D.C.	• Princess Alexandra Hospital NHS Trust
• Essex CC	• Harlow Health Centres Trust
• Hertfordshire CC	• British Waterways
• Eastwick and Gilston PC	• Forestry Commission
• Hunsdon PC	• Campaign to Protect Rural England
• Stanstead Abbots PC	• Friends of the Earth
• Nazeing PC	• RSPB
• Epping Upland PC	• Essex Wildlife Trust
• Matching PC	• Harlow Civic Society
• Northweald Bassett PC	• Harlow Biodiversity Partnership
• Roydon PC	• Harlow Conservation Volunteers
• Sheering PC	• Town Park User's Group

Appendix 2 – Consultation Responses

Respondent	Type of Comment (Suggestion, Query, Comment Support, Criticism, Clarification)	Comment	Response to comment (noted, agree, disagree)	How has this been taken into account?
Miller Strategic Land (Mr Andy Evans)	Comment	Draft Sustainability Appraisal Scoping Report: 2.4 Proposed SA framework. The SA needs to appraise against impact of development outside but adjoining Harlow, not just within Harlow.	Noted	This is not a consideration for this Scoping Report. Cumulative impacts will be considered as part of the SA report. Considered as part of the Harlow Area Options Appraisal Study.
Miller Strategic Land (Mr Andy Evans)	Comment	Draft Sustainability Appraisal Scoping Report: 4.6 What issues should be a particular focus for the appraisal? While we agree with the need to consider issues listed under 4.6.1, as indicated elsewhere, constraining the capacity of this area for development by reference to local factors must also be assessed against the implied diversion of growth elsewhere, probably largely to adjoining Districts with particular reference to the landscape boundaries to development to be defined	Noted	Not within the scope of this local authority SA. Considered as part of the Harlow Area Options Appraisal study. This will also be a consideration for the Core Strategy.
Miller Strategic Land (Mr Andy Evans)	Comment	Draft Sustainability Appraisal Scoping Report: 11.6 What issues should be a particular focus for the appraisal? While capable of being considered under the first two bullet points, we wish to emphasise the need for Harlow to consider how to enhance its attraction as a location for Stansted related growth, particularly should proposals for a new northern M11 junction come to fruition. In such circumstances, the eastern growth area could have an enhanced potential for employment related development alongside proposed new residential led new neighbourhoods	Noted	Stansted Airport and the location of Harlow is highlighted within sections 11 (employment), 12 (housing) and 13 (transport). In particular, sections 11.4.2 (employment) and 4.4.4 (eastern growth area) cover these points.
Miller Strategic Land (Mr Andy Evans)	Comment	Draft Sustainability Appraisal Scoping Report: 13.2 What's the policy context? While the DPDs need to distribute Harlow related housing growth between the three Districts, the corresponding SAs need to be capable of assessing impacts of options across District boundaries to inform such distribution.	Noted	This is covered in the draft Harlow Area Options Appraisal study.

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Miller Strategic Land (Mr Andy Evans)	Comment	Draft Sustainability Appraisal Scoping Report: 15.6 What issues should be a particular focus for the appraisal? Protection of local landscape and local ridges needs to be assessed against implications of diverting development elsewhere, potentially outside Harlow District's boundaries when setting precise limits to development proposals. In the broader context, East Harlow (extending northward into Epping Forest District) represents a well contained landscape well related to the urban area where the opportunity to meet Harlow's development needs should be maximised while respecting the need to protect historic assets, and extending the Green Wedge and neighbourhood principles behind the Gibberd masterplan.	Noted	Not within the scope of this local authority SA. Considered as part of the Harlow Area Options Appraisal study. This will also be a consideration for the Core Strategy.
Miller Strategic Land (Mr Andy Evans)	Comment	Draft Sustainability Appraisal Scoping Report: 18.4 A Proportionate Assessment Whilst we agree with the proportionate principle, where taking the precautionary approach implies discounting an otherwise sustainable option, there clearly needs to be some further investigation to clarify whether the alleged impact upon a European Site is likely and if so whether it is capable of mitigation. Until the potential impacts of options are better understood, it is difficult to comment further.	Noted	Subsequent HRA will follow beyond the initial scoping and evidence gathering phase.
Protection of Roydon Area PORA (Mr Alan Burgess)	Comment	Draft Sustainability Appraisal Scoping Report: 3.6 What issues should be a particular focus for the appraisal? In relation to the reference to "public realm", there is a tendency for property companies in new developments to take control of former publicly owned spaces. This has happened with the Water Gardens area without, it seems, the public being aware of loss of rights.	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Comment	Draft Sustainability Appraisal Scoping Report: 4.6 What issues should be a particular focus for the appraisal? Eastern growth area. Comment: Newhall development seems to be exemplary and promises to deliver a sustainable community but transport issues need to be addressed.	Noted	N/A

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Protection of Roydon Area PORA (Mr Alan Burgess)	Comment	Draft Sustainability Appraisal Scoping Report: 5.1 Introduction Neighbourhoods. Comment: Any moves to make neighbourhoods more self-sufficient are to be welcomed so as to decrease the need to travel for shopping or other amenities.	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Support	Draft Sustainability Appraisal Scoping Report: 6.6 What issues should be a particular focus for the appraisal? Industrial and employment areas. Comment: Strongly support bullet point 6.6.1 on suitable location. As mentioned in the text the Pinnacles is not well placed for transport links.	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Support	Draft Sustainability Appraisal Scoping Report: 7.6 What issues should be a particular focus for the appraisal? Air Quality Comment: Strongly support 7.6.1. An important role of planning is to aim to decrease the need for vehicle movements.	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Suggestion	Draft Sustainability Appraisal Scoping Report: 8.6 What issues should be a particular focus for the appraisal? Biodiversity and green infrastructure. Suggest additional bullet point at 8.6.1. "Work with neighbouring local authorities and other bodies to preserve and enhance Harlow's rural setting". This is already happening to an extent. Epping Forest Countrycare, for example, works with Harlow's Biodiversity Officer. Herts CMS has work on the Stort Valley. Both Essex Wildlife Trust and its Hertfordshire equivalent are developing the Stort Valley Living Landscape concept).	Disagree	This is an issue of cross-local authority working and is not considered to be an appraisal issue for particular focus.
Protection of Roydon Area PORA (Mr Alan Burgess)	Comment	Draft Sustainability Appraisal Scoping Report: 9.6 What issues should be a particular focus for the appraisal? Climate Change. Comment: Urban surface flooding often results in litter and pollution affecting the rural environment as is experienced at the point where Canons Brook joins the Stort Navigation	Noted	This is mentioned in paragraph 9.4.6 and will be considered in the appraisal.

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Protection of Roydon Area PORA (Mr Alan Burgess)	Support	Draft Sustainability Appraisal Scoping Report: 14.6 What issues should be a particular focus for the appraisal? Land. Strongly support 14.6.1	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Support	Draft Sustainability Appraisal Scoping Report: 15.6 What issues should be a particular focus for the appraisal? Landscape. Strongly support principles set out. Biodiversity does not recognise boundaries, so protection of species needs to apply across the wider district. Strongly support 15.6.1	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Comment	Draft Sustainability Appraisal Scoping Report: 16.4 What's the situation now? (including any existing problems) Transport. Note point 16.4.6 first bullet point; absence of planning for Northern Bypass	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Comment	Draft Sustainability Appraisal Scoping Report: 17.4 What's the situation now? (including any existing problems) Water. Comment: The current situation at Rye Meads Sewage treatment plant is already unsatisfactory. We understand that EA is concerned that water flowing downstream from the works is hardly meeting EU standards with current levels of housing, This and the acknowledged problem of consumer water provision cast doubts over the practicality of extensive development in the Harlow area	Noted	N/A
Protection of Roydon Area PORA (Mr Alan Burgess)	Comment	Draft Sustainability Appraisal Scoping Report: 18.4 A Proportionate Assessment European Sites. The farmland to the south and west of Harlow has strategic significance because it links two European Sites: Epping Forest and the Lee Valley Regional Park. Development in this area could put pressure on these environmentally important areas.	Noted	A consideration for subsequent HRA.

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East of England Development Agency (Natalie Blaken)	Comment	Draft Sustainability Appraisal Scoping Report: 11. Economy and employment EEDA welcomes the inclusion within the sustainability appraisal of the importance of the RES in relation to the strategic ambitions for Harlow (Chapter 11, Economy and Employment). In particular, the recognition of the opportunities relative to the sub regions proximity to London, Stansted Airport and Cambridge, and the significant role it has to play as a regional centre are welcome. In EEDA's experience, many scoping reports usually provide only limited reference to the 'socio-economic' impacts of the proposed LDF. EEDA considers that they usually need to be expanded to identify the wider socio-economic issues, benefits and costs.	Noted	N/A
Hallam Land Management (Mr David Lewis)	Suggestion	Draft Sustainability Appraisal Scoping Report: 2.4 Proposed SA framework Harlow has a tight administrative boundary that will require land from adjoining districts' if the town to expand in accordance with policy HA1 of the adopted RSS. We consider the SA Scoping Report (SASR) should consider a wider policy area covering the flanks of the town, as identified in policy HA1. Scoping individual authority areas fails to consider reasonable alternatives or recognise the importance of delivery of infrastructure in the context of PPS12. The SASR only considers the eastern flank and is therefore contrary to the advice of PPS12.	Disagree	Not within the scope of this local authority SA. Considered as part of the Harlow Area Options Appraisal study. This will also be a consideration for the Core Strategy.
Epping Forest District Council (Amanda Wintle)	Support	Draft Sustainability Appraisal Scoping Report: 1. Introduction The framework as proposed is considered generally suitable for the purposes of developing the emerging Core Strategy.	Noted	N/A
Epping Forest District Council (Amanda Wintle)	Suggestion	Draft Sustainability Appraisal Scoping Report: 13. Housing The growth agenda for Harlow is predicated on the assumption this will bring about the desired regeneration of the existing town. Whilst this regeneration benefit has been identified as one of the key issues when	Agree	Inserted new paragraph 13.1.2 and new bullet point in 13.6.1.

Respondent	Type of Comment (Suggestion, Query, Comment Support, Criticism, Clarification)	Comment	Response to comment (noted, agree, disagree)	How has this been taken into account?
		considering the future of the Town Centre, it does not seem to be such a strong factor when considering housing. This section should be revisited to ensure the regeneration benefits that may result from the growth of Harlow are fully considered throughout the SA process.		
Epping Forest District Council (Amanda Wintle)	Suggestion	Draft Sustainability Appraisal Scoping Report: 14. Land The growth agenda for Harlow is predicated on the assumption this will bring about the desired regeneration of the existing town. Whilst this regeneration benefit has been identified as one of the key issues when considering the future of the Town Centre, it does not seem to be such a strong factor when considering land matters (Ch 14). This section should be revisited to ensure the regeneration benefits that may result from the growth of Harlow are fully considered throughout the SA process.	Agree	Inserted new bullet point in 14.6.1.
Hallam Land Management (Mr David Lewis)	Comment	Draft Sustainability Appraisal Scoping Report: 11. Economy and employment The narrow scope of the SA Scoping Report (SASR) fails to consider jobs growth and regeneration adjoining the town. Significant inward investment and jobs growth will be required if the core strategy is to meet its economic and regeneration objectives, requiring (we believe) land to the south adjoining the strategic road network, to support inward investment. The SASR must therefore consider the flanks of Harlow outside of it's administrate boundary, if the process is to be found sound.	Disagree	Not within the scope of this local authority SA. Considered as part of the Harlow Area Options Appraisal study. This will also be a consideration for the Core Strategy.
Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 9. Climate change (mitigation and adaptation) We consider that this document deals adequately with flood risk issues, although we found it strange that flood risk issues were in the climate change section rather than the water section. If it were to stay in this section it might be worth considering re-arranging so that there is a flood risk sub-section or re-ordering e.g.: 9.2.6 is confusingly about energy efficiency in the middle of the flood risk paragraphs.	Agree	Section 9.2 has been restructured to reflect these comments.
Environment	Suggestion	Draft Sustainability Appraisal Scoping Report: 9. Climate change	Agree	New bullet points inserted in 8.6.1,

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Agency (Alex Mitchell)		(mitigation and adaptation) There should be more emphasis on Sustainable Drainage Systems (SuDS) throughout this document. Although they are briefly mentioned in the 'Water' section with regard to water quality they offer great potential to meet many of the sustainability objectives across a variety of areas. They therefore can play an important role in shaping Harlow as a sustainable community and should feature more prominently in this document to form part of the proposed solution to many of the issues highlighted such as: biodiversity and green infrastructure, landscape, flood risk, climate change and community well being.		9.6.1, 10.6.1 and 17.6.1.
Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 9.2 What's the policy context? The sentence "Harlow is undertaking a joint SFRA with East Herts and Epping Forest local authorities" should read "a joint SFRA with Epping Forest" as East Herts have done their own.	Agree	Paragraph 9.2.7 amended.
Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 9.2 What's the policy context? This section is ok but could be expanded to reference the Stort Policy Unit of the Thames CFMP and highlight the policies most relevant to Harlow.	Agree	New paragraph 9.2.11 inserted.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 3.6 What issues should be a particular focus for the appraisal? The present town centre is very poor in biodiversity and within any new scheme biodiversity enhancements should be a key issue, with the creation of new green spaces rather than concreted areas, native tree planting, Sustainable Drainage Systems, etc.	Noted	New paragraph 3.4.5 inserted.
Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 15.4 What's the situation now? (including existing problems) Landscape Character Areas are tabulated (Table 21) but it would also be helpful to include a map showing their location.	Noted	Not possible to produce a Landscape Character Areas map for inclusion; however, the Harlow Area Landscape and Environment Study are clearly signposted within the text.

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Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 2.4 Proposed SA framework Chapter titles should be expanded more for easy reference e.g. waste is included in the land chapter. It is assumed that housing will cover sustainable construction and water services infrastructure and that water will cover water resources, water quality and flood risk. European sites should be listed with biodiversity.	Noted	Inserted new paragraphs 2.4.4 and 8.1.3 and amended paragraph 2.4.3.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 8.1 Introduction Green infrastructure also provides corridors which connect areas of open space and allows wildlife to migrate to new habitats as a result of the changing climate.	Agree	Paragraph 8.1.2 amended.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 9.2 What's the policy context? National Indicator (188) covers planning to adapt to climate change. All local authorities must complete a climate change adaptation plan.	Agree	New paragraph 9.2.2 inserted.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 9.2 What's the policy context? Water efficiency is also essential for climate change adaptation/mitigation and is covered in the Code for Sustainable Homes. Most of the South East has been classified as Water Stressed Areas with the greatest water consumption in the country. As the demand for water increases with the rising population, its availability will decrease due to increased evaporation from higher temperatures. A large amount of energy is required to heat water in the home.	Agree	New paragraph 9.2.6 inserted.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 9.3 What are the key objectives and other decision-making criteria that we need to consider? Sustainable construction would contribute to reducing the energy demand e.g. high rated appliances, insulation, sourcing materials locally, Combined Heat and Power Association etc.	Noted	See paragraph 2.3.5 for rationale.
Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 9.4 What's the situation now? (including any existing problems) We would like to see a resource efficiency study which looks at both	Noted	The Scoping Report collates existing and identifies known forthcoming evidence. The

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		energy and water resources and includes retrofitting of existing homes and buildings. Reference also should be made to the Rye Meads Water Cycle Study and the draft Water Cycle Study Scoping study for North Harlow. Most Water Cycle Studies cover water demand management scenarios, flood risk, sustainable drainage, ecology and carbon costing of water services infrastructure.		undertaking of a resource efficiency study is a decision for the Council. Paragraph 9.4.9 amended and paragraph 17.4.7 removed. New paragraphs 9.4.3 and 9.4.8 inserted.
Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 14.2 What's the policy context? Derelict brownfield land should not be used where wildlife habitat has evolved.	Agree	Inserted new paragraph 14.2.7.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 17.2 What's the policy context? The River Basin Management Plan is now published. The EU Water Framework Directive (WFD) is likely to result in revised consenting measures and therefore could have an impact on the capacity of Sewage Treatment Works (STWs) to discharge to local watercourses.	Agree	Paragraph 17.2.1 amended.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 17.2 What's the policy context? The current published Catchment Abstraction Management Strategy for Harlow is the Upper Lee Catchment Abstraction Management Strategy.	Agree	Paragraph 17.2.5 updated.
Environment Agency (Alex Mitchell)	Suggestion	Draft Sustainability Appraisal Scoping Report: 17.2 What's the policy context? The comment about further work required for the Rye Meads Sewage Treatment Works (STW) is a result of the full Water Cycle Study that was published at the end of last year and should be referenced. This study lists further work required in terms of water services infrastructure.	Agree	New paragraph 17.2.8 inserted.
Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 17.4 What's the situation now? (including any existing problems) Three Valleys are now known as Veolia Water Central.	Agree	Paragraphs 17.4.3 and 17.4.6 and Table 24 amended.

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Environment Agency (Alex Mitchell)	Comment	Draft Sustainability Appraisal Scoping Report: 17.4 What's the situation now? (including any existing problems) Rye Meads Water Cycle Study was published at the end of last year, although further work is required.	Noted	Paragraph 9.4.9 amended and paragraph 17.4.7 removed. New paragraphs 17.4.7 – 17.4.9 inserted.