

ESSENTIAL REFERENCE PAPER 'P': CHAPTER 10 - NORTH OF HARLOW

Q43: North of Harlow

a. Do you agree with the consultants Suggested Approach in respect of growth to the north of Harlow?

b. If not, how would you distribute development in accordance with Policy HA1 of the East of England Plan and why?

- Individuals/residents: Part a = 313; Part b = 165
- Developers/landowners/agents/businesses: Part a = 10; Part b = 16
- Stakeholders/organisations: Part a = 23

- Bishop's Stortford Civic Federation
- Bishop's Stortford College
- Broxbourne Woods Area Conservation Society
- Buntingford Civic Society
- CPRE – The Hertfordshire Society
- East Herts Ramblers
- Environment Agency
- Epping Forest District Council
- Essex County Council – Environment, Sustainability & Highways
- Haileybury School
- Harlow District Council
- Hertford Civic Society
- Hertfordshire Association of Town and Parish Councils
- Hertfordshire Biological Records Centre
- Hertfordshire County Council
- Hertfordshire Gardens Trust
- Highways Agency
- Much Hadham Church Council
- St Margarets Church PCC
- STOP Harlow North
- Stop Stansted Expansion
- The Ramblers' Association
- The Thatching Information Service

- Stakeholders/Organisations: Part b = 9

- Bishop's Stortford Civic Federation
- Buntingford Civic Society
- Epping Forest District Council
- Harlow Renaissance Ltd
- Hertfordshire Gardens Trust
- National Grid
- Parsonage Residents Association
- Ramblers' Association
- Thorley Manor Residents Association

- Town and Parish Councils:

Part a responses = 11

- Bayford
- Eastwick & Gilston
- Hertford
- High Wych
- Hunsdon
- Little Berkhamsted
- Little Hadham
- Much Hadham
- Sawbridgeworth
- Stanstead Abbots
- Widford

Part b responses = 13

- Bayford
- Brickendon Liberty
- Buckland and Chipping
- Eastwick & Gilston
- Great Munden
- High Wych
- Hunsdon
- Little Berkhamsted
- Standon
- Thundridge
- Walkern
- Watton-at-Stone
- Widford

| Q43 - Summary | Q43 - Detailed Comments |
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| Comments on specific directions | <ul style="list-style-type: none"> • Development should be to the south not the north; south is nearer the M11; road links are better to the south; south of Harlow needs regeneration • Develop north of Harlow to leave the Green Belt near Epping Forest • Development should be to the east up to the M11, not the north. Countryside in this direction has already been compromised • Agree with the consultants recommendation of Option C • Land to the north of Harlow was considered to be the most sensitive compared to south, east or west (Colin Buchanan, 2004, paragraph 10.10.4) |
| Alternative strategies | <ul style="list-style-type: none"> • Spread development throughout East Herts, to enhance existing settlements and minimise the impact; gradual 'organic' growth to all settlements; development in villages to meet local needs. • Concentrate development in East Herts towns; concentrate development in larger East Herts towns such as Hertford and Ware • Ease development restrictions in the villages instead • Use Hunsdon airfield site • Develop Great Dunmow/ Braintree instead • Put the development in and around Stevenage rather than north of Harlow • Create small self contained sustainable settlements rather than urban sprawl. Create a sense of place • Use empty homes • Create a single new town for all 8,500 homes, but not north of Harlow. • Overall strategy should be to allow modest infilling, even in Green Belt locations; use infill in towns and villages • Restrict Greenfield development to encourage brownfield redevelopment e.g. Thames Gateway, Edinburgh Way Develop on extensive green spaces within Harlow rather than on the Green Belt; build within Harlow not East Herts villages • Use open spaces within Harlow for development • Build upwards (high rise) within Harlow rather than outwards |
| Support Harlow North | <ul style="list-style-type: none"> • Needed to address unmet housing demand in the region • That the most sustainable option is to the north has been tested through examination in terms of its planning and sustainability credentials (and endorsed by the High Court) • Support the principle of urban extensions to Harlow, Stevenage, and Welwyn Garden City, at no more than 4000 each. • If the district is viewed as a whole, this is probably the least bad option for East Herts to meet its housing need. • Can help to drive economic recovery • Support the principle of growth to the north of Harlow, but suggest the final distribution be decided following input from Harlow and Epping Forest District Councils. Should be a separate policy area. • Harlow North is the most appropriate strategy when considered against the reasonable alternatives; preferable to incremental growth elsewhere which would impact existing (historic) towns and villages. • There are very few physical and environmental constraints to development • Transport modelling suggests that a northern spine road and new motorway junction on the M11 would not be strictly necessary to support the traffic needs of North Harlow • Few on-site residents, compared with other potential growth areas in the district • Economies of scale from a large development: e.g. decentralised energy, water collection and treatment, reducing need for external travel, provision of full mix of housing stock • Masterplanning and design can minimise impacts on villages, biodiversity impact, and historic character in the area of the development; or even enhance them. |

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| | <ul style="list-style-type: none"> • Based on an evaluation of the strategic objectives, North Harlow is the appropriate locations to accommodate district's housing needs to 2031. • Would allow employment, and transport to be provided alongside other support services • North Harlow has the capacity to meet all of E. Herts housing needs to 2031 • North of Harlow could leverage investment to the advantage of E. Herts and Harlow • Creation of high-value jobs • Will enhance the Stort valley as a focus for the town, rebranding it as a 'green' place |
| Support development north of Harlow – benefits to East Herts | <ul style="list-style-type: none"> • Preferably to development other towns and villages, which are over developed. Infrastructure is overloaded in towns and villages. Existing towns and villages cannot cope. • Abolition of RSS targets means that North Harlow can make a significant contribution to E. herts housing needs. • Easier to deliver 600 new homes p.a. on a single site rather than scattered across the district in a collection of small sites. Greater certainty than numerous small developments • Support north Harlow – resources and infrastructure can be concentrated using new methods for building, heating etc rather than being scattered throughout the area. • Support – this location should be used regardless of East of England Plan – makes good use of Harlow Mill, and will improve bus service between 3 major towns • Development at North Harlow would relieve pressure on existing towns and villages; and prevent piecemeal growth there • Support development south of Redericks Lane, which was mistakenly classified as Greenfield in the Harlow Options Appraisal, but is actually historic landfill (brownfield) • Areas north of Harlow in greater proximity to the town and existing employment areas should be considered more favourably than remoter sites. • Development strategy should highlight benefits of jobs and housing growth at Harlow for East Herts residents. • Can enhance the heritage and environmental quality of the area |
| Support development north of Harlow – benefits to Harlow | <ul style="list-style-type: none"> • Support major strategic growth at Harlow which will transform the town • Important sub-regional role of Harlow – London Arc • This scale of development is needed in order to achieve transformational change; critical mass, and sustainability features • High quality/aspirational housing necessary to attract a broader socio-economic mix to the town |
| Oppose Development north of Harlow | <ul style="list-style-type: none"> • Keep Harlow in Essex • Impact on the beautiful countryside/rural area (56) • Object to loss of Green Belt Land (59) • Quality of life/'breathing space', impact on lifestyles (13) • People not profits; developers seek large houses which local people cannot afford; Need low cost rented accommodation, not big detached houses with no regard to infrastructure greed • Object to development north of Harlow • Even allowing 2000 homes north of Harlow would set a precedent for further long-term expansion ambitions of the developers. Would entail a loss of control of development for generations to come. • No natural limits to development before the A120 once the Stort Valley threshold is broken • Scale of development is too big • Aircraft flightpath – noise. Colin Buchanan study (2004) notes that eastern parts are in the 57dB(A) Leq noise contour. • Impact on tranquillity • Pylons crossing the site pose cancer risk |

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| | <ul style="list-style-type: none"> • Not reasonable or sustainable to suggest that all development should go north of Harlow • Unexploded ordnance • Breach of A414/Stort valley • Develop in Harlow rather than the countryside; protect the countryside • Development should help to stabilise and improve existing communities rather than try to introduce large area development which does not encourage communities • New government, new agenda; localism and community wishes; top-down RSS process was undemocratic and lacking in transparency; should be in accordance with locally developed town and parish plans • Harlow North has already been rejected twice, by the Herts Structure Plan and by RPG9. • Development would have serious impact on 16 wildlife sites, 2 scheduled ancient monuments, 6 areas of archaeological significance and a number of historic gardens, especially the Gilston Estate. • Need to reflect future changes in the RSS situation in the Core Strategy. • Despite abolition of RSS, govt is still committed to high house building rates • Object to development in the Green Belt • Will coalesce Harlow and Sawbridgeworth/Bishop's Stortford; will create conurbation joining as far as Hertford and Ware; uncontrolled urban sprawl • 95% of responses to Much Hadham Parish Plan questionnaire object to proposals for any development north of Harlow. • LCA says 'improve and conserve' • Will result in dormitory town • Protect and retain high-quality agricultural land • Impact on the character of the villages. Towns and villages north of Harlow should be treated no differently from other towns and villages of similar size and character in the district; should not be treated as a 'sink' for housing requirement. • Impact on local community • The development would spread existing crime and social problems from Harlow • Inappropriate retail development such as supermarkets • Impact on rural character of East Herts and the quality of life • Too much development already • Need a better not a bigger Harlow • Sustainability Appraisal of the original RSS raised several important doubts about the overall sustainability • No conclusive Appropriate Assessment yet conducted |
| Oppose development north of Harlow – jobs arguments | <ul style="list-style-type: none"> • There are no local jobs to support such a development. Unrealistic economic aspirations. Will be a commuter town. Jobs before houses. Two major pharmaceutical companies have shut down sites • The recent Harlow Infrastructure Study (March 2010) only identifies potential for 1,900 jobs north of Harlow by 2031. Clearly there would be massive out commuting from development in this location. • RSS was housing-led: no evidence for jobs creation assertions. No evidence to support a policy that Harlow will attract such high tech industries as is suggested. |
| Oppose development north of Harlow – EiP arguments | <ul style="list-style-type: none"> • Agree with the EiP panel that development north of Harlow would create a separate town; this is exacerbated by the latest proposals from Places for People. I&O paragraph 3.7.8 states that a new settlement will not be considered on the basis that it will not be deliverable within the plan period. This statement also applies to Harlow north, which would to all intents and purpose be a stand-alone settlement. • North Harlow will never integrate with Harlow as the railway and river will always be a barrier to effective linkages between the two. Stort is a natural boundary. • Latest proposals from Places for People is clearly a separate settlement. This reconfiguration is based on a retrenchment of the proposal onto land controlled by |

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| | <p>the developer, i.e. it reflects what they are now able to deliver. Para 3.7.8 notes that E Herts will not consider a new settlement – this also applies to north Harlow.</p> <ul style="list-style-type: none"> • EiP independent Panel opposed it, following lengthy debate, but was over-ridden by the then Secretary of State without justifying the decision. • E. Herts objected to Harlow north at the EiP; East Herts Council previously opposed expansion to the north. • Agree with the EiP panel that there are strong objections on environmental and landscape grounds; Sustainability Statement prepared by EERA for EiP states that “the CBA study concluded that the location was in the highest category of sensitivity to anything more than 50-100 dwellings and was unlikely to accommodate the particular type of change without extensive degradation of character and value. Mitigation measures are unlikely to be able to address potential landscape/environmental issues” • Area used for rambling, bird-watching, horse riding, cycling, boating and other recreation. STOP Harlow North’s proposals for Gilston Great Park aim to build on this existing use. • Support Gilston Great Park. Harlow Green Infrastructure Plan supports the principles in the Gilston Great Park proposal for ‘actively managed countryside’, which are also complemented by the Stort Waterspace Strategy. |
| Oppose north of Harlow – infrastructure cannot cope | <ul style="list-style-type: none"> • Increased traffic congestion, e.g. Much Hadham, Sawbridgeworth, Bishop’s Stortford, A414 roundabout • Congestion on trains • No public money to fund the infrastructure, especially since the Comprehensive Spending Review 2010; Learning and Skills Councils (LSC) funding crisis means Harlow College capital programme cannot proceed. • No significant development should occur without firm funding commitments to provide facilities at the same time as, or before, the development occurs • Link road to M11 would be critical • Scott Wilson’s proposals do not address the existing infrastructure deficit • Development would not resolve existing congestion, which is caused by local and terminating traffic • Infrastructure cannot cope; not deliverable • Concerns about sewage capacity; capacity of Rye Meads sewage treatment works; major network upgrades will be needed, as shown by the Rye Meads Water Cycle Strategy. • Schools full; doctors/hospital at capacity • Water supplies cannot sustain a larger population; local water companies are investigating low water pressures in the Hugh Wych area during the summer months which has stopped some homes and businesses having adequate supplies at peak times. • Damage and destruction to wildlife & habitats: e.g. trees, owls, deer, buzzards • Water Framework Directive is a key risk, as Rye Meads WwTW may be required to produce a discharge with a much higher quality in the future than at present, which may even lead to a possible reduction of current maximum volumetric flow consent if the specified chemical and biological quality improvements are not achievable through improved treatment and financial investment. • No gas supply • Concerns about traffic on B1004 through Much Hadham • Development will cause flooding; no building in a floodplain • Possible detrimental effect on Hunsdon Meads SSSI, which could be affected by flooding caused by surface water run-off from the development. |
| Oppose north of Harlow – disbenefits to Harlow | <ul style="list-style-type: none"> • Will damage the urban form of Harlow; contrary to Gibberd principles. Build to the east first. Stort is a natural boundary between Essex/Harlow and Herts. • Regenerate Harlow first • No regeneration benefits to Harlow – it is a freestanding settlement. Scale of |

| Q43 - Summary | Q43 - Detailed Comments |
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| | <p>development would undermine regeneration efforts. Target regeneration efforts within the existing town. Developers want to make the development separate from Harlow, probably with a different name – do not care about regeneration; increase housing density with Harlow. Green Belt encourages regeneration of Harlow rather than take the easy Greenfield option which allows obsolescence to remain in the town.</p> <ul style="list-style-type: none"> • No prospect of job creation to match housing growth; could harm employment and regeneration within E. Herts |
| No need | <ul style="list-style-type: none"> • No justification for all these new homes; reduce the quantum of development; too many homes planned; scale too large; scale is inappropriate to Hertfordshire • No need for East Herts to accommodate London overspill – London plan allows for that. • Question need for so much housing. • Developing North of Harlow will only encourage more people into the area creating a need for more housing; No need for housing due to lack of demand during the recession; Development creates fresh need; Mass immigration creates need; Homes not needed; There is no need for another faceless Church Langley or Thorley Park; a school in Harlow has just closed due to lack of numbers. • No need since Stansted airport second runway now binned; 2nd runway abandoned therefore fewer job opportunities • Will not meet need for affordable housing as well as smaller sites elsewhere in the district |
| Suggestions for a sustainable development | <ul style="list-style-type: none"> • Should incorporate a truly sustainable drainage system that provides benefits to water quality and improves the environment. • New housing should not be mass produced on ugly estates; no 'brutal' flats; poor quality of residential design on modern developments. • Rivers flowing north-south through the site should be protected by an 8m buffer strip. No development in Stort floodplain. Protect the Stort Valley • Will require appropriate governance arrangements for strategic delivery, e.g. LEP • Any development must be sustainable: including the right infrastructure and the right mix of housing and other land uses. • Any contribution to nationally driven housing targets, such as the growth areas, should no longer form part of the rationale for Harlow growth • Towns and villages should have priority in being allowed to expand in order to meet local need and support existing services; use brownfield sites in existing towns and villages • Do not build on Stort flood plain • Development should not impact the identity of the existing villages e.g. Hunsdon • Planning and sustainability merits have been tested at examination and endorsed by the High Court |
| Miscellaneous | <ul style="list-style-type: none"> • Questionnaires not delivered • Not enough explanation of the Harlow Options Appraisal is provided. • Must know more about the housing mix and needs of people • Population growth is unsustainable • Vested interests – extensive promotion by HNJV may have trumped planning concerns on RSS policy process. Object to HNJV flyer – misleading. Although residents have repeatedly stated their opposition to the principle of major development in the green fields north of Harlow, NHJV has continued to use such feedback in a frantic attempt to demonstrate community engagement to support their scheme. • Develop north of England and Wales instead of the south • Need a review of the evidence base for development north of Harlow • Question consultants' methodology; lacking in site level detail • Strategic Objectives should be more specific to the spatial context e.g. Theme 1 should refer to towns as the best place to minimise transport emissions. Theme 4 |

| Q43 - Summary | Q43 - Detailed Comments |
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| | <p>should relate design to Gibberd, rather than East Herts</p> <ul style="list-style-type: none"> • Para 10.7.5 - Consultants advised that development to the north of Harlow could undermine regeneration benefits – difficult to see how this work could be achieved. • East of England Plan has been abolished, therefore no development should take place north of Harlow |

Comments received to Q43 in respect of other Chapters

Chapter 1: Background and Context

| Q43 - Summary Comment | Q43 - Detailed Comment |
|---------------------------------|---|
| Sustainability Appraisal | <ul style="list-style-type: none"> The SA has several shortcomings in relation to development north of Harlow: gives no weight to positive cross-boundary impacts at Harlow; fails to recognise that the approach is about the wider housing needs of Hertfordshire, Essex and London; does not give enough weight to social and economic considerations. The SA is superficial. |

Chapter 2: Key Issues and Vision

| Q43 - Summary Comment | Q43 - Detailed Comment |
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| Theme 1: Energy and Climate Change | <ul style="list-style-type: none"> EEC1 should encourage sustainable location in reducing transport emissions |
| Theme 3: Housing | <ul style="list-style-type: none"> The need to increase housing supply in relation to wider area, as set out in the SHMA and RSS evidence base, does not appear to have information the objectives. Govt is still committed to high housebuilding rates, despite abolition of RSS. Significant backlog of unmet housing need Overall housebuilding target is far too high – should be accommodated on brownfield land. |
| Theme 4: Character | <ul style="list-style-type: none"> Fails to assess whether character will best be maintained by a series of Greenfield developments or a single concentrated development – given that there are not enough brownfield sites. 'Green bubble' is inappropriate – a non-planning term. As above, fails to deal with the central policy choice of how to accommodate development on Greenfield sites – through concentration or dispersal |
| Theme 5: Economy, Skills & Prosperity | <ul style="list-style-type: none"> If, as stated in 2.8.4, numerous existing operators are located in premises no longer suitable for their needs, it is important that they relocate within the local area. As such, the Council needs to consider its strategy for improving and enhancing unsuitable premises in conjunction with providing new premises in locations such as North Harlow, to prevent the loss of employers from the district. |

Chapter 3: Development Strategy

| Q43 - Summary Comment | Q43 - Detailed Comment |
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| Q22: Development Strategy | <ul style="list-style-type: none"> The evidence base, including SHMA and RSS, points towards need for more not less housing – contradicts paragraph Question sequential approach to Greenfield land use – paragraph 3.5.10 |
| Q23: Distribution Strategy | <ul style="list-style-type: none"> Fails to recognise option to distribute to a single centre |